Hearing Statement – Matter 5

Doncaster Local Plan

On behalf of Framecourt Homes

August 2020
1. **Introduction**

1.1. This is a Hearing Statement prepared by Spawforths on behalf of Framecourt Homes in respect of:

   Matter 5: Housing Supply

1.2. Framecourt Homes has significant land interests in the area and has made representations to earlier stages of the Local Plan process.

1.3. The Inspector’s Issues and Questions are included for ease of reference. The following responses should be read in conjunction with Framecourt Homes comments upon the submission version of the Doncaster Local Plan, dated September 2019.

1.4. Framecourt Homes has also expressed a desire to attend and participate in Matter 5 of the Examination in Public.
2. **Matter 5 – Housing Supply**

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. Framecourt Homes has concerns about the approach to site Selection Methodology. In Matter 1 we have raised significant concerns in relation to the Site Selection Process. Framecourt Homes are concerned about the consistency of the approach adopted, and the weight attached to community consultation.

2.2. Framecourt Homes have expressed concerns in relation to the role of the Sustainability Appraisal in the site selection process in Matter 1. With specific regard to housing allocations the site selection methodology sets out a 7 stage process for site selection [SDEB 46]. Stage 4 relates to the Sustainability Appraisal. A summary of each sites performance against each objective is stated within [SDEB46]. There is no conclusion for each site’s performance against the Sustainability Appraisal. There is no conclusion drawn for each settlement within the site selection methodology or Sustainability Appraisal. All sites assessed in Stage 4 are taken to the next stage of the site selection methodology. It is not clear to the reader how the findings of the Sustainability Appraisal has influenced the Plan with reference to the selection of sites or what weight is attributed to the performance within the Sustainability Appraisal as opposed to later stages of the site selection process.

2.3. Framecourt Homes have noted a number of occasions where rejected sites perform as well or better than sites that are proposed to be allocated and sites that are proposed as ‘Reserve Sites’.

2.4. The following list is not exclusive but includes sites which perform better within the Sustainability Appraisal than sites that are proposed to be allocated:

- Site 1019. Tickhill. This is a part brownfield site performs better than site 1028 in the sustainability appraisal.
2.5. Taking into account the above, Framecourt Homes are concerned that the **Sustainability Appraisal and Sustainability Appraisal Addendum do not therefore seem to have consistently informed the Plan**, and SDEB 46 is not sufficiently clear to provide clarity for the role of the Sustainability Appraisal in the site selection process.

2.6. Framecourt Homes have significant concerns that the site selection process and identification of Reserve Sites has been informed by an inadequate evidence base, with particular regards to flood risk. Framecourt Homes considers there is an urgent need for a Level 2 SFRA to inform the Plan and site selection process.

2.7. The site selection methodology [DMC 7, paragraph 7.2.4] relates to the sequential test. It states that sites the Council identify as failing the first sift of the sequential test fall out of the process. However, it subsequently considers that should subsequent stages not identify sufficient sustainable and deliverable/developable sites to meet the settlements housing target requirement, there may be wider sustainability justification to further consider them.

2.8. The Submission Plan identifies a number of ‘Reserve Sites’. The process for identifying these sites is not clear. The sites are not considered to be ‘developable’ and are either affected by significant flood constraints, or are safeguarded for HS2. The Council has not included them in the supply as set out in the Submission Plan. Significantly, within SDEB 46, the Council concludes that there is insufficient detail for SFRA Level 2 to apply the exception test to support the allocation of the sites, but still identifies them as ‘Reserve Sites’. Framecourt Homes do not consider the ‘Reserve Sites’ as identified are appropriate; their identification is not consistent with the Council’s own site selection methodology, and it is contrary to national policy with regards to flood risk in the absence of a Level 2 SFRA. Framecourt Homes have identified a number of circumstances where other ‘omission sites’ perform better than the identified ‘Reserve Sites’.

2.9. The submission Plan identifies a number of reserve sites are identified of which Site 398, 399, 495, 497 and 500 are all affected by Flood Risk. There are sites available within Doncaster which have developer interest, perform better within the Sustainability Appraisal, and pass the first sift of the flood risk sequential test, including Site 1019.

2.10. The approach to site selection and flood risk is not consistent with the provisions of the NPPF and NPPG.
2.11. In Matter 4, in response to Q4.2, Framecourt Homes demonstrate that an inconsistent approach has been taken to Green Belt release. In Tickhill the submission Plan allocates Site 1028. Site 1028 is a greenfield site, with access issues. In order to be consistent with the Framework, Framecourt Homes consider that within Tickhill priority should have been given to the allocation of site 1019, Apy Hill. Site 1019 is a part brownfield site. Further, this site performs better than the allocated site in the sustainability appraisal, including on accessibility criteria (access to cycle network, access to schools). DMBC 3 indicates that site 1019 has access issues. However, access is achievable as demonstrated in the submitted Advocacy Report, which is supported by an Access Appraisal. In this case the approach to site selection has not been consistent with the Framework with regard to Green Belt.

2.12. Framecourt Homes are concerned that there has been an overreliance on extant planning permissions without sufficient regard to the planning history of the site, developer interest, and likely viability. This is including but not limited to the following sites:

- Site 838 – This is a longstanding site that has not been developed. This site was included in the Publication Version of the Plan, with a capacity of 930. It is noted that the capacity has been reduced to 671 in the Minor Modifications [CSD 5]. This is to reflect a current planning application 19/01982/FULM. It is acknowledged that there is a recommendation to grant approval. The Officer’s report notes that the scheme is unviable and is reliant on grant funding from Homes England. However, at the time of writing, the decision notice had not been issued and funding had not been agreed. As a minimum the delivery forecast in the first five years of the plan should be significantly discounted. If there is no evidence that funding is likely to be forthcoming. The site should be discounted from the supply due to significant viability issues [671 units].

- Site 544 - Consent was granted on this site in 2007, a start was recorded in 2011, however the site has since stalled, and units on site that were started do not appear completed. It is understood that there are a number of drainage and technical issues that affect the site and remain unresolved. The site should be discounted from supply [55 units].

- Site 569 – Long standing unimplemented planning permission that has been available but has remained undeveloped. The most recent RLA indicates that a reserved
matters application is pending. There is no developer interest. The site should be discounted from supply [220 units].

- Site 795 – this site had permission which has since lapsed. There appears to be little developer interest in this site. The site is not considered to be deliverable [13 units].

- Site 510 – This is a narrow and constrained infill site, with railway forming the southern boundary of the site. There is little evidence to indicate developer interest in the site. [25 units]

2.13. Reliance on these sites to contribute to the supply is not justified and is not consistent with national policy and guidance.

2.14. It is crucial that the site selection process is undertaken in a consistent and objective way. Our analysis indicates that this has not been the case and thus the site selection process is not justified and is not consistent with national policy, and is considered unsound.

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?

2.15. As explained in Matter 2, Framecourt Homes considers there is a need to revise the strategic aim to reflect a requirement that is consistent with the economic growth in the Plan and a review of the underlying assumptions. Furthermore, we note that there is a need to extend the Plan period by a minimum of an additional year. As a result, we consider that the strategic aim should be to deliver a minimum of 1,100 homes per annum, which would equate to 22,000 homes in the plan period between 2015-2035 and 23,100 dwellings for a plan period between 2015 and 2036.
Part A

2.16. In terms of existing commitments, it appears that the Council assumes 100% delivery and no discount has been applied. Best Practice and Guidance suggests that at least a 10% discount should be applied on sites with extant planning permission but this could vary depending on site specific constraints and complexity. Framecourt Homes supports the discounting of sites with planning permission, but consider it may be beneficial to include a higher level of discount for large sites to take into account unforeseen circumstances and delivery delays.

2.17. Framecourt Homes have assessed the allocations with permission at 2018. Focusing purely on applications that have lapsed, or at the beginning of August 2020, are close to lapsing, sites with no known developer interest, and sites with significant constraints which have stalled, a minimum of 524 dwellings should be discounted from the supply (Refer to Appendix 2 for details). This includes larger sites such as Site 544 and Site 569. By the end of the Plan period Framecourt Homes considers that this figure will be higher and we have significant concerns with the inclusion of Site 838 for 671 dwellings given the evidenced viability concerns identified above. There have been a number of planning applications and proposed schemes over the years but there has been no delivery on site. Countryside PLC submitted a planning application, and there is conflicting evidence in terms of delivery rates. The latest deliverable housing land supply statement confirms that application 19/01982/FULM notes a reduced capacity of 671 dwellings, and this has now been reflected in the Council’s suggested modifications. The Officer report, whilst recommending approval subject to a S106 Agreement states that the scheme is not viable, therefore delivery of affordable housing is subject to grant funding from Homes England. At the time of the report it was noted that this funding had not yet been secured (May 2020).

2.18. Furthermore, there are a number of sites that are included in the list of allocations with permission, which we do not expect to come forward at the rate forecasted within the submission Plan.
<table>
<thead>
<tr>
<th>Site Ref</th>
<th>Site Name</th>
<th>No. of Dwellings</th>
<th>Framecourt Homes Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>843</td>
<td>Manor Farm, Bessacarr</td>
<td>1,009</td>
<td>This is a Persimmon / Charles Church scheme. However, delivery has become frustrated by the need to deliver infrastructure to complete development. Since there is only one developer on the site the development trajectory is likely to be modest and development of the site is unlikely to be achieved during the plan period. The Residential Land Availability Report indicates 39 completed in 17/18, and the 2018/19 RLA indicates 56 units were delivered in 18/19. The delivery rates achieved are below the rates expected in the Local Plan and HELAA, which assumes delivery rates of around 70 dwellings a year. This is not realistic based on current delivery. 908 units remained to be delivered at end of 2018/19 monitoring period. The Deliverable Housing Land Supply Statement does not provide any further update/explanation to support delivery at the site 350 units are indicated to be deliverable in the next 5 years/ years 0-5 of the Plan.</td>
</tr>
<tr>
<td>418</td>
<td>Unity/DN7 Initiative</td>
<td>1015</td>
<td>The site has outline planning permission for 3,100 homes and 20/01197/REMM – details of appearance, landscaping, layout and scale for a estate road from Hatfield Links Road into Unity Connect, Awaiting Decision. Discharge of Conditions in relation to drainage submitted on 4th May 2020. The site is in significant multiple ownership and we understand that CPO procedures will be employed to facilitate the delivery of requisite infrastructure. Homes England is also assigning public funding to support the development. Given the presence of multiple landowners, the need for considerable public funding, the likelihood of a protracted timeframe to open up the site for development and the absence of confirmed market interest, the site is unlikely to deliver the Council’s prediction of 1015 homes in the plan period. The Council anticipates delivery of 175 dwellings in years 0-5 of the Plan SDEB 26 confirms that there was no delivery in 2018/19. SDDE27 notes that works on Junction 5 M18 Link are underway and due to be complete in summer 2020 Indicated that this should facilitate the delivery of new homes and commercial uses. The road is now understood to be complete by the end of 2020, and open in 2021. As such the rates are overly optimistic especially when compared to annual completions for individual sites recorded in the residential land availability report, As the Reserved matters are awaiting approval, first completions would not be anticipated until 2021/22 reducing the level of supply anticipated in years 0-5 of the Plan.</td>
</tr>
</tbody>
</table>
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<table>
<thead>
<tr>
<th>Site Ref</th>
<th>Site Name</th>
<th>No. of Dwellings</th>
<th>Framecourt Homes Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1057/ANP</td>
<td></td>
<td>400</td>
<td>The latest RLA indicates that there was no delivery in 18/19. A Reserved Matters has been submitted (20/01421/REMM). The decision is pending. There is little evidence to support the delivery of 280 dwellings in the remaining years of years 0 -5 of the Plan.</td>
</tr>
</tbody>
</table>

2.19. Framecourt Homes consider that there is sufficient evidence to justify a minimum of a 10% non-implementation rate, reducing the forecast supply from allocations with permission by 930 dwellings to **8,360**, however this could feasibly be higher given the history and constraints of a number of sites.

**Part B**

2.20. The 585 new homes built on other commitments is based on 83 commitments in defined villages, and 502 units on schemes of up to 4 units across the district. Framecourt Homes have reviewed the supply against information within [SDEB 26]. This indicates that 109 units are on sites that have stalled i.e. a start was recorded, however there has been no recent delivery. A further 57 homes are on sites that are close to lapsing with no start on site recorded. This would support the need to account for non-implementation. Of the permissions within defined villages, SDEB 26 indicates that a potential 55 units will not come forward. This is made up of 39 units associated with planning reference 12/03102/FULM, which is noted to be stalled at August 2020. Of more concern no start has been recorded at planning reference 17/00068/FULM or 16/00916/FUL, which are both close to lapsing. Framecourt Homes consider that this supports a higher non-implementation rate for small sites, and within the defined villages. Framecourt Homes consider a non-implementation rate of 20% should be introduced, although this is considered conservative.

**Part C**

2.21. Framecourt Homes has reviewed the allocations without planning permission. We consider there is insufficient evidence demonstrate that there is a reasonable prospect of the following sites coming forward.
• Site 1028 – This site appears to have no viable access, it requires on the acquisition of garages to facilitate the access, which will impact on viability, along with mitigation associated with noise and air quality issues. Discount 74 dwellings.
• Site 795 – this site has previously had permission which has since lapsed. There is little evidence of developer interest in the site. Discount 13 dwellings.
• Site 510 – this site is a narrow and constrained infill site with little evidence of developer interest. Discount 25 dwellings.
• Site 133 - The RLA has indicated that the site capacity will be reduced by 50% to respond to concerns by Historic England. Discount 12 dwellings.
• Site 835 – this site will not come forward as identified in the Plan, a recent application reduced the capacity of the site. Discount 4 dwellings to reflect latest planning consent.

2.22. Based on this the above list Framecourt Homes consider it would be appropriate to allow for non-implementation of allocations without permission. Framecourt Homes have identified a minimum reduction of 128 dwellings, but given the history and constraints that impact on other sites this could feasibly be higher.

2.23. It is noted that the supply attributed to completions appears to be resultant from gross completions rather than net completions. The Plan indicates that completions between 2015 and 2018 equate to 3,400 homes. However, data in the Residential Land Availability Report indicates that net completions amount to 3,211 dwellings which would serve to increase the residual requirement based on an OAN of 920 dwellings to at least 15,189 dwellings, and reduce the flexibility in the Plan to 866 dwellings (4.7%), which is insufficient for a Borough seeking growth.
<table>
<thead>
<tr>
<th></th>
<th>Council Figures</th>
<th>Spawforths</th>
<th>Comments/justification</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Net Completions 2015-2018</strong></td>
<td>3,400</td>
<td>3,211</td>
<td>Spawforths have used the completions set out in the RLA, based on the ‘net completions RLA methodology’ figures is 3,211 dwellings. The Council have used the figure for net additions to Council tax stock, and not based on the RLA methodology which identifies whether there are other reasons for the new Council tax data. In using this wider data for completions there is an increased likelihood the level of completions has been over inflated in the supply.</td>
</tr>
<tr>
<td>Expected completions with planning permission at 2018</td>
<td>9,289</td>
<td>8,360</td>
<td>Allows for 10% non-implementation rate, in line with evidence on lapsed/stalled sites.</td>
</tr>
<tr>
<td>Expected completions on completions not in allocated sites (small sites and in defined villages)</td>
<td>585</td>
<td>468</td>
<td>Allows for a 20% non-implementation rate, in line with the evidence on lapsed/stalled sites.</td>
</tr>
<tr>
<td>Expected completions on allocations without planning permission</td>
<td>6,630</td>
<td>6,502 / 5,967</td>
<td>Based on a discount of 128 dwellings / 10% non-implementation</td>
</tr>
<tr>
<td>Total 2015 to 2035</td>
<td>19904</td>
<td>18,421 / 18,006</td>
<td>Range dependent on discount on completions on allocations without planning permission.</td>
</tr>
</tbody>
</table>
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?

Part A

2.24. In PQ26 the Council consider that they would anticipate a supply from windfall housing of around 200 dpa. The Council have then calculated the total expected from 1st April 2018 to 31st March 2035 to be 3,400 dwellings. We consider that this figure, if applied in full, would lead to some double counting initially, as ‘known’ windfalls will already be included within the supply and anticipated to contribute towards delivery during the Plan Period. Framecourt Homes do not consider that windfall sites should be included in the early years of the Plan to avoid double counting. Furthermore, permissions on unknown windfalls granted post 1st April 2018 are not likely to result in any completions within the year 2018/19. Framecourt Homes would anticipate a period of 12 to 18 months from permission to start on site, with a further 6 months to the first completion. Equally, any new permissions on windfall sites at the latter end of the plan period, would not be expected to deliver any completions during the Plan Period. This would reduce the level of unknown windfalls that could be considered to realistically make a contribution to the supply of homes during the Plan period to circa 2,600 dwellings.

2.25. With regards to the actual annual average of windfalls being assumed, there is no recent evidence within Doncaster of the level of windfalls with an adopted Plan including allocations in place. The higher annual average windfalls that are pointed to within DMBC 4 over the last 20 years should be considered against a context of an absence of a Development Plan incorporating allocations. The Council, in response to PQ 26, note that there is little way of
evidencing potential future supply and state that ‘it has not been possible to make an allowance from windfalls during the Plan towards the overall housing requirement due to lack of evidence to provide certainty around future supply’. The assumption of 200 dpa against the context of having an up to date Plan in place, in which the trajectory forecasts delivery in the first part of the Plan period as exceeding 1,200 dpa in 6 out of the first 7 years of the Plan, Figure 3 of the Submission Plan, may be overly optimistic.

2.26. It may be reasonable to expect a supply of windfalls arising from the recent changes to Permitted Development Rights. At present, the completions as a result of Prior Notifications contribute a nominal number of completions; 20 dwellings were completed in 18/19, with only and additional 5 on the sites listed completed in previous years. [SDEB 26].

2.27. **Framecourt Homes does not consider that there is enough evidence to support the inclusion of an additional 3,400 dwellings arising from windfalls into Table 5.**

### Part B

2.28. Framecourt Homes is concerned that the Council is identifying a further source of windfalls in Defined Villages on top of the more general windfall allowance discussed in Part A above. It is not considered appropriate to include a further figure for windfalls in Defined Villages. The figure of 290 dwellings is based on the cumulative growth limit for Defined Villages within the Submission Plan (Policy 3). Including this figure on top of a figure for commitments of 5+ in Defined Villages, and commitments between 1-4 dwellings in Defined Villages would amount to double counting, as the existing permissions would contribute towards the cumulative growth limit for their respective Defined Village.

2.29. Framecourt Homes consider that including 290 dwellings on top of the proposed windfall allowance of 200 dpa would constitute double counting. Framecourt Homes consider that these windfalls in Defined Villages would be included in the more general windfall allowance. Furthermore, a number of the Defined Villages with a cumulative growth limit are in locations that are significantly constrained by flood risk, such as Arksey, Blaxton, and Fishlake. This could serve to further limit the viable options in those locations.

2.30. Framecourt Homes would like to highlight that the Council has not put forward any evidence to show that this additional source of supply exists and the additional 290 dwellings arising from the Defined Villages in Table 5 on supply should be removed.
Part C

2.31. Framecourt Homes do not consider that it is appropriate to include a figure for 197 dwellings arising from sites on the Brownfield register which have not been identified as allocations. It is considered that delivery on brownfield sites would have informed the evidence to support an appropriate overall windfall allowance. To include an additional allowance is likely to lead to double counting. This is acknowledged by the Council in their response to PQ27.

<table>
<thead>
<tr>
<th>Windfalls</th>
<th>Doncaster</th>
<th>Spawforths</th>
</tr>
</thead>
<tbody>
<tr>
<td>Windfalls (200 per year 2018-2035)</td>
<td>3,400</td>
<td>2,600 (to reflect delivery arising from unknown windfalls within the plan period)</td>
</tr>
<tr>
<td>Windfalls at Defined Villages (policies 2 and 3)</td>
<td>290</td>
<td>0 (included within windfall allowance, and extant permissions within defined villages will contribute to growth limits)</td>
</tr>
<tr>
<td>Windfalls on sites identified in the brownfield register 2019</td>
<td>197</td>
<td>0 (double counting)</td>
</tr>
<tr>
<td>Total windfalls</td>
<td>3,887</td>
<td>2,600</td>
</tr>
</tbody>
</table>

Part D

2.32. In order to consider whether new homes at Doncaster Sheffield Airport should be included within the supply of housing in Table 5, there is a need to assess how the growth at the airport has been considered as part of the assumptions when determining an appropriate policy on requirement.

2.33. Notwithstanding the concerns set out in Matter 2 with regards to the appropriateness of the requirement, the policy on approach considered by PBA is based on 1% jobs growth. PBA note that the core growth assumed in the draft DSA airport masterplan 2018, amounts to a growth from 1,000 to 5,963 jobs in 2031, an increase of 4,963 jobs. PBA consider that this is consistent with the economic growth forecasts in the policy on scenario (1% growth). The
high growth scenario in the airport would therefore amount to additional jobs growth, which has not been factored into assumptions supporting the jobs led (policy on) scenario, and therefore have not been factored in when calculating the housing requirement.

2.34. Paragraph 4.40 of the PBA report states that the Council could base its uplifted target on the jobs led scenario, it goes on to note that this would not have to be 1,073 resultant from full achievement of the SEP target (1% growth, considered by PBA to be consistent with the core growth airport masterplan scenario), but could adopt a lower number. It is stated that this is because the target is considered as ambitious and the jobs growth and housing demand predicted by the policy might not be realised. The requirement in the Plan is 920 dwellings, thus below the target that reflects the full achievement of SEP ambitions of 1% jobs growth.

2.35. Policy 7 sets out a ratio between jobs growth and housing delivery, establishing the level of jobs growth that would be required to support an additional 1,200 homes at the airport. Based on the Councils methodology 10,910 additional jobs would be required at the airport to support the delivery of 1,200 homes. This level of jobs growth is significantly over and above the core jobs growth assumptions (a growth of 4,963 jobs) that was considered by PBA to be consistent with the 1% jobs growth assumptions that inform the policy on housing growth target. As noted above the housing requirement of 920 dwellings is not based on the full achievement of the SEP growth ambitions (including core growth from the airport).

2.36. Framecourt Homes consider it is inappropriate to include a figure for the new homes at the airport as the jobs growth necessary to deliver an additional 1,200 homes at the airport (10,910 jobs directly related to the airport) does not inform the policy on (jobs growth scenario) requirement.

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?

2.37. Framecourt Homes consider that table 5 should be modified in line with response in Q5.2
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?

2.38. Framecourt Homes has no specific comment in relation to this issue.

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?

2.39. As explained in Matter 2 and Matter 3, Framecourt Homes do not consider that having a range, as currently suggested, is appropriate in Doncaster and will not be effective in helping to ensure housing need can be met and deliver the economic growth ambitions.

2.40. The Plan is seeking to deliver economic growth in line with the SEP ambitions; this is reflected within the employment requirement. As considered under Matter 2 there is sufficient evidence to justify a significant uplift to the standard methodology, in order to reflect the level of economic growth supported in the Plan and past delivery rates. In this context it is not appropriate to have a range where the lower end of that range does not align with the Plan’s economic growth ambitions. Framecourt Homes maintain that it is appropriate to have a single requirement that reflects the economic growth aspirations, supports affordable housing delivery and ensures internal consistency throughout the Plan. Framecourt Homes consider that this will provide greater certainty to all parties.

2.41. The current standard methodology is significantly below the housing requirement which incorporates economic growth. Government guidance is clear that the standard methodology is a starting point to create the housing requirement for the Plan to which you add local factors, such as economic growth. Utilising the standard methodology for calculating the five year housing requirement is neither effective nor appropriate for meeting the economic growth ambitions for the Borough or meeting the local housing need. Ultimately it will
constrain economic growth, and/or lead to unsustainable patterns of development or travel to support jobs growth within the Borough.

2.42. Furthermore, calculating the five year requirement based on a figure which is resultant from a methodology that is noted to be flawed does not represent a sound approach. This would not be consistent with the Government’s aims of significantly boosting the supply of homes, which has been reiterated in the ‘Planning for the future’ policy paper (August 2020) and the consultation ‘Changes to the current Planning System (August 2020). The Government is committed to delivering 300,000 homes per year, and 1 million homes by the end of parliament. As such, it has proposed a revised approach to the standard methodology. Applying this revised methodology results in a requirement figure of 960dpa, which is significantly higher than the current standard methodology, and also higher than the policy on requirement of 920 dpa. There is concern that the revised methodology does not reflect the Northern Powerhouse ambitions and deliver the anticipated rebalancing proposed. It is therefore reasonable to conceive that there may be further revisions to the proposed methodology to support the aims of the Northern Powerhouse.

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?

2.43. Framecourt Homes has reviewed the permissions included within the five year supply at 1st April 2019 in SDEB 27, based on their position at the beginning of August 2020. Of the sites under 10 dwellings, 82 units are on sites that are very close to lapsing or have lapsed and there appears to be no sign of a start on site. 167 units are on stalled sites. Framecourt Homes consider that the supply within category A should be reduced by 249 dwellings. This would suggest a higher non-implementation rate than the assumed 10% in SDEB 27 and in response to PQ29.

2.44. In terms of the sites of 10 or more dwellings, with detailed planning permission, Framecourt Homes consider 240 units should be discounted from the category B supply. Of these, 20 have lapsed and other sites have stalled, or there is limited developer interest.
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?

Framecourt Homes have reviewed the details of sites with outline planning permission of 10 dwellings or more at 1st April 2019. We consider there is insufficient evidence to demonstrate that the following sites will contribute to the supply as forecast within SDEB 27.

<table>
<thead>
<tr>
<th>Reference</th>
<th>5 year capacity</th>
<th>Spawforths</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>15/01278/OUTM</td>
<td>280</td>
<td>210</td>
<td>Optimistic delivery rates: Discharge of conditions sought at the end of November 2019/Pending decision at July 2020.</td>
</tr>
<tr>
<td>12/00188/OUTM</td>
<td>280</td>
<td>210</td>
<td>A reserved matters has been submitted 20/01421/REMM. Decision Pending</td>
</tr>
<tr>
<td>14/00484/OUT</td>
<td>5</td>
<td>0</td>
<td>Permission has expired</td>
</tr>
<tr>
<td>08/01077/OUTA</td>
<td>140</td>
<td>0</td>
<td>History of planning, lack of developer interest in this site. Framecourt Homes do not consider this site should be relied on for a source of supply within the Plan.</td>
</tr>
</tbody>
</table>
In relation to sites with planning permissions in principle, Framecourt Homes has reviewed the information within SDEB 27, which indicates that development has stalled on four of these sites - this amounts to 5 dwellings. This indicates that whilst only sites with starts have been included, it remains appropriate to include a non-implementation rate of circa 5%.

<table>
<thead>
<tr>
<th>Reference</th>
<th>Capacity</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>16/01087/PRIOR</td>
<td>3</td>
<td>Start was recorded in 16/17, only 1 unit completed, no completions during 18/19</td>
</tr>
<tr>
<td>15/00221/P3JPA</td>
<td>2</td>
<td>Start recorded in 15/16, 1 completion recorded, no completions in 18/19.</td>
</tr>
<tr>
<td>15/01806/PIAPA</td>
<td>2</td>
<td>Start recorded in 16/17, 1 completion recorded, no completions recorded in 18/19</td>
</tr>
<tr>
<td>14/02462/PIAPA</td>
<td>1</td>
<td>Start recorded in 14/15, however no completions recorded to date.</td>
</tr>
</tbody>
</table>
Framecourt Homes considers that there is a need to adjust the windfall allowance that is included within the five year supply from 1st April 2019. The windfall allowance of 1,000 dwellings in the five year supply is based on an annual allowance of 200 dwellings. The five year supply arising from sites with full or outline planning permission will include supply from ‘known’ windfalls (windfall sites with permission). It is unrealistic to assume that permission(s) for 200 dwellings on an unknown windfall site(s) in Year 1 will result in 200 additional completions in Year 1. Framecourt Homes would expect a minimum of 12-18 months from planning permission to start on site, and a further 6 months until the first completion. Framecourt Homes consider that no windfalls can really make a difference to supply in the first two years. Equally, permissions granted on unknown windfall sites in years 4 and 5 are unlikely to make any contribution to completions within the five year supply.

As a result, the impact on five year supply of an additional 1,000 dwellings, based on 200 windfall dpa being granted on unknown windfall site(s) should be significantly reduced.

Framecourt Homes is concerned that the housing trajectory demonstrates that the Council will struggle to maintain a continuous supply of housing, particularly in the later phases of the Plan period, with only four sites capable of delivering sites towards the end of the Plan period and only two sites capable of delivering beyond the Plan period. There are a number of settlements where there is no forecast supply of housing from year 11, including the Main Towns of Adwick and Woodlands, Armthorpe, Coinsbrough and Denaby, Mexborough, Thorne- Moorends.
2.50. The trajectory indicates that from year 2028/29, delivery is anticipated to fall below the standard methodology (at 2019), at less than 500 dwellings, and by 2031/32 onwards delivery will be below 200 dwellings per annum.

2.51. Framecourt Homes have reviewed the housing supply and trajectory and have identified a significant number of permissions that will not come forward as anticipated. Framecourt Homes consider that the supply excluding windfalls will be a maximum of 18,541 / 18,006 dwellings (dependent on non-implementation discount).

2.52. Framecourt Homes consider that the trajectory as set out in Figure 3 should be reviewed, and based on realistic assumptions of expected delivery.

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?

2.53. Figure 3 indicates that there will be a sufficient supply of housing in the five years following adoption, however as indicated above, we consider that this may have been based on unrealistic assumptions regarding anticipated delivery rates and thus should be reviewed. For simplicity, Framecourt Homes have summarised their view of five year supply in the table below.

<table>
<thead>
<tr>
<th>A) Sites of fewer than 10 dwellings with permission</th>
<th>Deliverable Supply 1st April 2019 to 31st March 2024 (Doncaster)</th>
<th>Deliverable capacity with 10% post lapse rate.</th>
<th>Spawforths</th>
</tr>
</thead>
<tbody>
<tr>
<td>786</td>
<td>707</td>
<td>537 (-249)</td>
<td></td>
</tr>
</tbody>
</table>
### Table

<table>
<thead>
<tr>
<th></th>
<th>B) Sites of 10 or more with detailed planning permission</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>3,449</td>
<td>3,104</td>
<td>3,209 (-240)</td>
</tr>
<tr>
<td></td>
<td>C) Sites of 10 or more dwellings with outline planning permission</td>
<td>1,314</td>
<td>1,183</td>
</tr>
<tr>
<td></td>
<td>D) Sites with a grant of planning permission in principle</td>
<td>119</td>
<td>119</td>
</tr>
<tr>
<td></td>
<td>E) Allocations without planning permission</td>
<td>1,561</td>
<td>1,405</td>
</tr>
<tr>
<td></td>
<td>F) Windfall Allowance</td>
<td>1,000</td>
<td>1,000</td>
</tr>
<tr>
<td></td>
<td>G) Total</td>
<td>8,229</td>
<td>7,518</td>
</tr>
</tbody>
</table>

2.54. Therefore, further sites need to be identified in the Borough. Framecourt Homes suggest the following available, suitable and achievable sites:

**Site 1019, Apy Hill, Tickhill**

2.55. Framecourt Homes suggests that **Site 1019 at Apy Hill, Tickhill should be allocated and should be identified as a housing site.**
2.56. The site at Apy Hill, Tickhill is a part brownfield site located on the edge of an established residential area and benefits from easy access to the full range of services and facilities located within Tickhill. The site is part brownfield and includes an employment park. The proposed scheme would re-configure and upgrade the current industrial estate and provide new housing alongside it. The site is therefore in a sustainable and appropriate location for housing growth. New housing should be located within Tickhill to that identified needs can be met.

2.57. The Apy Hill, Tickhill site should therefore be allocated to deliver housing in the short term. A robust Green Belt boundary can be created utilising Apy Hill Lane, the railway line and the northern boundary of the current employment site and tree belt which is clear and well defined. This is a distinctive and long term urban boundary.

2.58. Framecourt Homes considers the proposed site is available, suitable and achievable and is therefore in accordance with the Framework a deliverable site able to come forward in the short term. Technical studies have been undertaken and are ongoing that demonstrate the site’s deliverability.

2.59. The deliverability and benefits of the Apy Hill, Tickhill site are contained in the attached Advocacy Report.

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?

2.60. Framecourt Homes has no specific comment in relation to this issue.

Proposed Change

2.61. To overcome the objection and address soundness matters, the following changes are proposed:
• Review the allocations resultant from the site selection process as set out in response to Q5.1 and make appropriate allocations in order to meet the required supply.

• Allocate additional sites to make up for the shortfall in supply in supply, against minimum requirement 1,100. NB there is a shortfall in supply when considered against the requirement of 920 d.pa over an extended plan period.

• Allocate site 1019, Apy Hill, Tickhill.
Appendix 1 – Site 1019 Apy Hill, Tickhill, Advocacy.
Tickhill

APY HILL LANE

FRAMECOURT HOMES & BROOKS PROPERTIES
Introduction

The land at Apy Hill Lane, Tickhill, presents a sustainable development opportunity to provide new housing for Doncaster. The site is being promoted by Framecourt Homes and Brooks Properties and Brooks Properties as a development opportunity that can deliver circa 70 dwellings and commercial development.

This advocacy document has been produced for the site at Apy Hill Lane, Tickhill. The site is being advocated to Doncaster Metropolitan Borough Council as part of the Local Plan Review. This document presents information to support the site’s release from the Green Belt and allocation for residential development by assessing its credentials against the five greenbelt tests and demonstration of sustainability, suitability and critically deliverability whilst retaining a valuable employment facility currently in need of modernisation.

The Site

The site is located to the north of Apy Hill Lane, Tickhill in an area currently designated as Green Belt. It is circa 3 Ha in area. The site is in an area on the western edge of Tickhill within 10 mins walk (800m) of the Centre of the village and to bus routes.

The site is adjacent to existing housing to the east and utilises some previously developed land. The disused railway line forms a strong western boundary to the site (former Maltby Colliery Line).

The site represents a highly sustainable development opportunity with access to existing facilities and services. It is a logical extension to Tickhill for circa 70 new homes alongside an upgraded employment site and supports the continued housing and economic growth of the town.

The site is part brownfield and includes a current employment park. The proposed scheme would re-configure and upgrade the current industrial estate and provide new housing alongside.

Scope

This Advocacy Report will set out the context and ambitions for the site at Apy Hill Lane, Tickhill before analysing and explaining the site’s availability, suitability and achievability and therefore deliverability in the context of the National Planning Policy Framework (the Framework).

An indicative masterplan for the site will show the potential for the site including green and blue infrastructure, movement and connectivity. The masterplan shows a scheme based on a number of technical assessments including highways, ecology and flood risk. The proposal provides significant benefits which are explained throughout the report including the provision of a range and choice of house types and tenure, job creation and economic growth.
Planning and Housing Need

There is a significant and recognised housing crisis within the UK. The country needs to provide around 300,000 homes per year to keep up with population growth and to start to tackle years of undersupply. Within Yorkshire significant stresses on housing supply also exist. The Local Authorities in Doncaster, Wakefield, Barnsley, Rotherham, Sheffield, Selby and Leeds need to provide at least 11,670 new homes per year cumulatively.

The Revised National Planning Policy Framework 2018 (the Framework) states that local authorities should meet their objectively assessed housing needs in full and to boost significantly the supply of housing. The current Core Strategy also recognises the need to deliver a sufficient supply of housing and support economic development and growth now to create sustainable communities.

The Borough of Doncaster is located on the crossroads of the main arterial routes of the A1(M) and M18 Motorways as well as being a major station on the East Coast Mainline and is located on a key route between the Region and the east coast ports. Doncaster is an integral part of the Sheffield City Region and the ambitious growth aspirations. The Strategic Economic Plan sets out the Sheffield City Region’s plans to transform the local economy over the next decade. At the heart of the plan is the creation of 70,000 new private sector jobs and 6,000 new businesses.

Therefore, to achieve the aspired growth that the City Region is seeking to achieve and is securing Government funding for the level of new housing needs to reflect the ambitions of the Strategic Economic Plan.

Furthermore, the Sheffield City Region Integrated Infrastructure Plan states:

A quality housing offer has a crucial role to play in the future economic growth of the City Region. It is essential to attracting and retaining a skills base that supports inward investment as we as meeting existing and future community needs and retention of Sheffield City Region (SCR) talent.

It has been identified that between 70,000 and 100,000 additional homes are needed in SCR to support the proposed economic growth over the next 10 years. These will have the dual benefit of providing accommodation that underpins the proposed increase in employment (70,000 jobs), as well as the wider economic benefits that housing investment brings.

The current wider economic context in the country is also relevant. The economic decline and associated recovery, its impact on the housing market and increasing housing crisis means schemes that assist economic and housing growth, are high on the Government’s priorities. The Localism Act, the Revised Framework, ministerial statements and budgets recognise the importance of housing and the significant economic imperative of encouraging new development proposals within appropriate and sustainable locations. Within this context, the planning system plays a crucial role in this approach to facilitating new development proposals.

Tickhill is a sustainable settlement to the south of Doncaster, which serves a wide hinterland. Tickhill in the emerging Local Plan should be accommodating 165 new homes. However, no allocations have been identified with all options having been rejected. Therefore, there is a significant under provision of housing in Tickhill. Given the need for housing this should be addressed.

The Apy Hill Lane site, which is part brownfield, therefore represents an opportunity to provide quality housing in a sustainable location to go towards meeting the housing needs of delivering much needed new homes within Tickhill and Doncaster.
Available and Suitable

The land at Apy Hill Lane, Tickhill provides a residential development opportunity in a sustainable location close to shops, services and community facilities to meet the needs of Tickhill and the Borough of Doncaster. The site is currently located within the Green Belt and is available, suitable and achievable in accordance with the Framework.

Availability
The land is being promoted by Framecourt Homes and Brooks Properties as promoter. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG).

Suitability
The Council has established the need for a Green Belt Review and has undertaken the work supporting the release of Green Belt sites. This site provides a vitally important opportunity to make a significant contribution to the identified housing needs of Tickhill, it does not effectively perform any Green Belt Function, would provide a suitable site for housing whilst retaining a valuable employment site and strengthen the boundary of the larger area of Green Belt to the west thus providing the exceptional circumstances to justify the release of the site from the Green Belt.

The site is located in a highly sustainable location and has residential development to the east and includes the remodelling and upgrading an existing industrial estate.

The site is within easy walking distance to the centre of Tickhill with a range of facilities provided there, as well as greater facilities. There are a number of primary schools in the vicinity of the site. The site is well served by buses providing opportunities for sustainable travel to work in Doncaster.

The development will provide additional quality development that will benefit Tickhill and the wider district with economic, environmental and social benefits.

The site lies on the edge of Tickhill with residential development located to the east, a railway line to the west and includes an employment site.

Achievable
A range of technical work has been undertaken and is set out elsewhere in this document. The assessments indicate that there are no technical issues that would prevent development or are insurmountable. The site is therefore considered to be achievable.

The indicative masterplan shows how a mix of housing can be accommodated within the site, alongside connectivity, landscaping and drainage features.

Economics
The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance of housing in an area is necessary for economic growth. The development of the Apy Hill Lane scheme can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population of Tickhill which will create sustainable local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity in Tickhill.

Summary
The site at Apy Hill Lane provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by Framecourt Homes and Brooks Properties and is deliverable within the plan period.
DMBC UDP Map 4 and Tickhill Inset Map 1998 with Green Belt highlighted and Site Identified
Green Belt Justification

The housing needs of Doncaster are putting severe pressure on the local authority to review the Green Belt. To meet the housing requirement Doncaster Council recognises that some Green Belt land will need to be released for new housing land. Apy Hill Lane, Tickhill is a unique opportunity to positively use the Green Belt and meet the housing need for the area.

In the Borough of Doncaster approximately 46% of the area is designated as Green Belt. This is the western part of the Borough which forms part of the South Yorkshire Green Belt surrounding urban areas.

The Framework explains that there are five purposes of including land within the Green Belt, which is:

- To check the unrestricted sprawl of large built up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land

The Framework considers that Green Belt boundaries can change “in exceptional circumstances”. Such a circumstance exists through the significant need to provide housing in Doncaster. To meet the housing need and economic growth aspirations the Council has stated it will need to revise the Green Belt boundaries for the emerging Local Plan and beyond to provide the new boundaries with some permanence.

Contextually, the site is “contained” by development and activity being part brownfield/employment site and adjacent to residential properties and lying adjacent to a railway line to the west. Within this context the release of the site from the Green Belt has limited impact on “openness” and that redevelopment of the site would have low impact on the purposes of including land within the Green Belt.

The Framework states that Green Belt boundaries should be drawn so as not to include land which it is unnecessary to keep permanently open. The site lies on the edge of Tickhill with residential development located to the east, a railway line to the west and includes an employment site.

The site is therefore “contained” and will not lead to unrestricted sprawl or encroachment. The site is located on the edge of Tickhill and is contained within its setting. The site would not therefore lead to the coalescence of towns. Whilst the development would result in development of some countryside the degree of encroachment into the countryside would be minimised. The site has no impact upon the setting of a historic town.

The new Green Belt boundary follows Apy Hill Lane and the railway line and northern boundary of the current employment site and tree belt which is clear and well defined. This boundary would accord with the Framework and ensure that the Green Belt is clearly defined using readily recognisable features to ensure permanency reinforcing the urban context whilst providing a robust boundary for the future.

All the boundaries have the potential to be further reinforced within the site through additional planting to ensure an effective transition between the development and the countryside beyond.
Comprehensive Settlement Analysis Plan

The Site

Sprinwell Lane Local Centre

To Doncaster Town Centre

To Bawtry

To A1(M) Junction

Key:
- Education
- Healthcare
- Community (Churches, Sports, etc)
- Retail
- Industrial/Commercial
- Public Open Space (Formal eg Sports)
- Commercial Facilities
- Pubs/ Restaurants
- Local or District Centre
- Bus route and stops
- Public Footpaths
- Listed Building
- Public Open Space (Informal)
- Scheduled Monument
- Main (A) category highways routes
- Railway Line
- Conservation Area
Settlement Analysis

The Apy Hill Lane site is located to the west of Tickhill, a market town located in the borough of Doncaster. Tickhill lies eight miles south of Doncaster, between Maltby and Harworth, on the junction of the A631 and A60 roads, and adjacent to the A1(M) motorway. The site is within walking distance (under 800m) of Tickhill high street. Market Place and Castle Gate are the main streets offering a range of specialist and independent shops.

Tickhill is an old market town dating back to the 11th century. The existing ruins of Tickhill Castle (a scheduled monument) and St Marys Church are a reminder of the historic importance and status of this town.

The proposed site is located on the western edge of Tickhill in close proximity to the urban area, the town centre and a number of existing facilities. To the west of the site is a railway line which separates Tickhill from the countryside situated to the south of the town. The railway line is used by freight trains only.

Tickhill is a settlement with a wide range of facilities that provide a good level of sustainability. Primary education is provided by Tickhill St Mary’s Primary School (off St Mary’s Road) and Tickhill Estfeld Primary School (off Common Lane). Both of these schools are approximately 13-20 minutes walk (1 mile) from the site. The closest secondary school is Serlby Park Academy in Bircoates (in Bassetlaw) which is located approximately 12 minutes drive (4.3 miles) to the east of the site.

There are numerous bus services which pass close to the site connecting the area with central Doncaster. The bus services along the A60 (Doncaster Road) and A631 (Tickhill Road) adjacent to the site provide up to four buses an hour into Doncaster Town Centre.

Doncaster Railway Station is 8 miles from the site and can be reached following a 35 minute bus ride.

<table>
<thead>
<tr>
<th>Facility</th>
<th>Distance to closest (miles)</th>
<th>Approx. journey time (mins)</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supermarket</td>
<td>3.2</td>
<td>21 mins Bus</td>
<td>Harworth</td>
</tr>
<tr>
<td>Local Shop(s)</td>
<td>0.6</td>
<td>10 mins Walk</td>
<td>Marketplace</td>
</tr>
<tr>
<td>Post Office</td>
<td>0.6</td>
<td>10 mins Walk</td>
<td>Marketplace</td>
</tr>
<tr>
<td>Library</td>
<td>0.6</td>
<td>10 mins Walk</td>
<td>Marketplace</td>
</tr>
<tr>
<td>Town Centre</td>
<td>0.6</td>
<td>10 mins Walk</td>
<td>Marketplace</td>
</tr>
<tr>
<td>GP Surgery</td>
<td>0.6</td>
<td>10 mins Walk</td>
<td>St Mary’s Road</td>
</tr>
<tr>
<td>Hospital</td>
<td>5.5</td>
<td>25 mins Bus</td>
<td>Tickhill Road, Donc.</td>
</tr>
<tr>
<td>Dentist</td>
<td>0.7</td>
<td>13 mins Walk</td>
<td>North Gate</td>
</tr>
<tr>
<td>Nursery</td>
<td>0.6</td>
<td>10 mins Walk</td>
<td>St Mary’s Road</td>
</tr>
<tr>
<td>Primary School</td>
<td>0.6</td>
<td>10 mins Walk</td>
<td>St Mary’s Road</td>
</tr>
<tr>
<td>Secondary School</td>
<td>4.3</td>
<td>12 mins Drive</td>
<td>Serlby Park Academy</td>
</tr>
<tr>
<td>Park / Playground</td>
<td>0.6</td>
<td>10 mins Walk</td>
<td>St Mary’s Road</td>
</tr>
<tr>
<td>Sports Pitches</td>
<td>1 mile</td>
<td>20 mins Walk</td>
<td>Sunderland Road</td>
</tr>
<tr>
<td>Bus Stop</td>
<td>0.2</td>
<td>5 mins Walk</td>
<td>Wong Lane</td>
</tr>
<tr>
<td>Train Station</td>
<td>8 miles</td>
<td>45 mins Bus</td>
<td>Doncaster</td>
</tr>
</tbody>
</table>
Site Photographs

Pedestrian link between the car park off St Mary's Road and the Market Place.

Street view down the Market Place showing specialist and independent shops.

Access to Tickhill Castle through the gate at Castle Gate.

View of the Market Place towards the junction with Sunderland Street showing The Lighthouse.

View towards St Mary's Church off Church Lane.

Pinfold Lane with typical housing stock including predominately semidetached houses.

View down Pinfold Lane with St Mary's Church at the vista.
Site Photographs

8. The neighbouring site along Pinfold Lane.

9. Access to the site off Pinfold Lane at the point where the road splits.

10. View towards the site boundary highlighted by mature trees off the access road.

11. Public Right of Way along the southern boundary of the site.

12. Image showing the outbuildings of the existing commercial enterprise.

13. View towards the field adjacent to the northern boundary of the site.

14. Northern boundary of the site defined by mature hedges.

15. View towards the site along the railway track.

16. View towards the railway bridge at Apy Hill Lane.
Illustrative Masterplan within Tickhill and the Southern Borough
A SWOT analysis has been undertaken with the conclusions used to inform the design process. Detailed technical reports have also been undertaken and are summarised in the following sections of this Advocacy Report. In addition, Framecourt Homes and Brooks Properties is promoting the site and will ensure the site would be delivered expediently.

The masterplan design proposal seeks to maximise the opportunities this sustainable site provides. The technical assessments demonstrate there are no known constraints that could not be suitably mitigated satisfactorily or that would prevent this site from coming forward within the plan period. They also identify positive opportunities for enhancement and betterment. The site is therefore achievable in accordance with the Framework.

Framecourt Homes and Brooks Properties has commissioned technical analysis of the site will ensure this site is deliverable in accordance with the Framework and can be relied upon to deliver new homes within the emerging Plan.
Site Issues & Opportunities

KEY
- Opportunity for Vehicular Access
- Public Right Of Way
- Existing Farm Buildings
- Employment Uses
- Existing Residential Units
- Opportunity for connection to Public Right of Way
- Existing Vegetation
- Rail Line
- Existing Green Spaces and Routes
- Telecommunications Mast
- Improved Access Road

Potential Additional Allocation

Tickhill - Wadworth railway line

Apy Hill Lane

Masts

Depot

Mast

Path

Friars' Hill

32m

35m AOD

30m AOD

26m

Junction

Friary Farm

Track

CROWN ROU
Site Issues & Opportunities

A number of site constraints and opportunities have been identified through the assessment process and used to inform the design process.

The Site
The site is approximately 3ha in size and is part brownfield. It is located approximately 800m to the west of Tickhill. Residential housing lies to the east of the site. To the north and south lies agricultural land. To the west a railway line serving freight trains separates the site from the landscape beyond. To the south of the site beyond a triangular piece of agricultural land lies an informal track that provides site access and Apy Hill Lane which connects the site to the A 631. Two Public Rights of Way run across the site, one on the northern boundary the other through the middle of the site. The western part of the site includes an existing employment site which will be reconfigured and upgraded as part of the proposed scheme.

Access into the industrial plot is via an informal track that runs along the railway line.

The site slopes gently from west to east and views into it are restricted by housing development and mature vegetation that dominates site boundaries.

Ecology
The site is considered to have limited ecological value for flora and fauna. Therefore, through the proposed scheme there is potential to enhance ecology in the area through planting of new native trees/hedges and wildlife corridors within the scheme.

Access
Apy Hill Lane lies adjacent to the southern boundary of the site indirectly connecting to the A631. There is a significant level difference between the site and Apy Hill Lane which has a 60 m/h speed limit. Site access is provided via a steeply rising access road off Apy Hill Lane that serves the existing commercial units before continuing along the railway line as an informal track.

Drainage
The site is located within Flood Risk Zone 1 and is therefore acceptable for development in flood risk terms.

There are no public sewers either crossing or within the site, with the nearest public sewers located in Saffron Close. There are no watercourses near or adjacent to the site.

The geological map for the area would indicate that soakaways are appropriate in this area for the discharge of surface water, subject to satisfactory percolation tests. Foul water would need to discharge to a public sewer.
Analysis of potential Wildlife Corridors and Higher Value Habitat

Key
- Scattered scrub
- Hardstanding
- Semi-improved grassland
- Fencing
- Tall ruderals
- Earth bank

Species-rich intact hedgerow
Defunct hedgerow
Intact hedgerow
Scattered trees
Black poplar
Site boundary

Target Notes
- TN1 Breeding bird potential
- TN2 Moderate bat potential
- TN3 Potential to fall under Important Hedgerows Regulations 1997

Map showing locations such as Track, Firbeck Junction, Masts, Depot, Mast, Path, and SAFFRX.
Estrada Ecology were commissioned to carry out an ecological appraisal at land at Apy Hill Lane, Tickhill in September 2018. The site is of low ecological value owing largely to its history of agricultural and industrial use.

The site comprising two fields of species-poor, semi-improved grassland bordered by intact and defunct hedges, scattered trees, tall ruderals and scrub communities, along with industrial buildings and hardstanding on the north and western elevations of the site.

The site is considered currently to have limited ecological value for ground flora. Species recorded during the survey were common and uniform in distribution. The site has a tall sward height which is dominated by coarse grass species likely to outcompete herb species.

There is little fauna interest on the site. There are no water bodies within the site boundary, and none were recorded to feed into the site. Therefore there are no impacts predicted in respect of riparian and aquatic species. As such, no impacts are predicted in respect of amphibians and no further surveys recommended at this time. The site recorded sub-optimal conditions for use by reptiles and no further surveys are recommended at this time. Furthermore, there was no evidence to suggest the use of the site by badgers and no impacts are predicted. Similarly, no signs of breeding birds were recorded in the trees or vegetation at the time of survey.

There are several buildings within the site boundary. All of these, excepting one building on the northern area of the site, lack suitable features and therefore possess negligible potential for use by bats as a roost or a place of shelter.

A number of mature ash and poplar trees on the southern, northern and western boundary’s are of an age and size which could support roosting bats. However, because these trees have a dense covering of ivy, which could obscure suitable fissures that bats could utilise these trees have only moderate potential for use by bats.

The network of hedgerows provides an ideal opportunity for biodiversity enhancement. The southern hedgerow and mature boundary trees should be retained where feasible. Where the loss of hedgerow or tree cover is required a suitable mitigation strategy will need to be designed into the proposed scheme.

Post development, the site would benefit from a sensitive planting scheme to include native broadleaved tree and wildflower species, in order to increase invertebrate species, and enhance the attractiveness of the site for birds, bats and other fauna.

Summary
The site is of low ecological value owing to its agricultural use. Therefore, through the site’s residential development and reconfigured employment there is the potential opportunity to enhance ecology in the area through planting of new native trees/hedges and wildlife corridors within the scheme.
Highways and Access

The Highways Strategy prepared by MET Consultants considers how the site is to be accessed and identifies that a single point of access should be provided from Apy Hill Lane. This access can be designed in accordance with the Council’s Street Design Guide.

Pedestrian and Cycle Infrastructure and Accessibility

Whilst there are no cycle facilities on Apy Hill Lane there is the potential for residents of the development to cycle into Tickhill Town Centre along Pinfold Lane.

Highways Infrastructure

The main highway access will be taken from Apy Hill Lane and will provide access to both the residential and commercial developments.

A draft access junction is being progressed in accordance with the Council’s Street Design Guide. This access will necessitate a widening of part of Apy Hill Lane to approximately 5.5m.

The new access road will rise steeply into the site before running its full length at level. There is the potential for an internal road hierarchy through the use of shared surface and private drives.

The location of the proposed access is deemed to be in the best location for access to the new residential area. New footways will be required on the access road to enable pedestrians to gain access into the new development.

The development of the site for up to 70 properties with access from the straight 60mph section of Apy Hill Lane would have no significant adverse impact on the local highway network. The site access is acceptable in geometric terms and will allow the safe passage of all road users into the site including cyclists and pedestrians.

Summary

The site is in a sustainable location with numerous bus services which pass close to the site connecting the area with central Doncaster. Doncaster Railway Station is 8 miles from the site and can be reached following a 35 minute bus ride.
Option 1
One Soakaway 1000m³

Option II
Two Soakaways 350m² 450m²

Fluvial Flood Risk

EA Flood Mapping

Sustainable Drainage Options
Flood Risk and Drainage

A preliminary drainage feasibility study was undertaken by Met Associates in Nov 2018. The Environment Agency identifies the site as being in Flood Zone 1 with a low risk of flooding for rivers or the sea.

Drainage
To comply with the requirements of NPPF, it is necessary to consider aspects of Sustainable Drainage for the new development.

The geological map for the area would indicate that soakaways are appropriate in this area for the discharge of surface water, subject to satisfactory percolation tests.

For the purpose of this report, low ground permeability has been assumed, and a dry pond (1000m²/1m depth) is considered sufficient for mitigation of surface water run-off. This is located close to Eastern boundary. Alternatively two soakaways; one in commercial development (350m²) and one in residential development (450m²) can be accommodated and would provide sufficient mitigation.

Foul water would need to discharge to a public sewer, which will necessitate requisition procedures by Severn Trent Water.
Key Design Principles Plan

- Main Access Road
- Key Pedestrian Route
- Public Open Space
- Wildlife Buffer
- Vehicular Access
- Proposed Attenuation

CONNECTION TO PUBLIC RIGHT OF WAY

EXISTING LANDSCAPE BUFFER

COMMERCIAL AREA

EXISTING HEDGEROW

POTENTIAL ADDITIONAL ALLOCATION

CONNECTION TO ADOPTED HIGHWAYS

CONNECTION TO PUBLIC RIGHT OF WAY

N

Friars' Hill

32m

Firbeck Junction

32m

Track

Path

SAFFRON CL

CROWN ROAD

32m

26m
Development Principles

The approach of the masterplan is to provide housing which integrates with the surrounding area making the most of the surrounding landscape and the pedestrian links. It provides improved access to existing industrial units and forms a natural extension to the existing housing development.

A number of principles have been identified as a result of the baseline assessment. The following key design principles inform the design concept and are present in the final scheme. Design principles are illustrated on the plan opposite:

Highways Layout
The main vehicular site access will be located on Apy Hill Lane. An access road with pavement either side is proposed to run the full length of the site and provide safe vehicular and pedestrian access. The use of shared surface and private drives create an internal road hierarchy.

Drainage
A Sustainable Urban Drainage solution will be provided through the incorporation of two attenuation ponds; one sited in greenspace adjacent to the commercial site the other sited in the greenspace situated at the heart of the residential development.

Public Open Space
The main public open space (POS) with the attenuation basin for the commercial development is linked by public footpaths with the second attenuation basin set within a green space and serving the residential development. Trees will be used within the scheme to identify this key pedestrian and vehicular route.

Ecology
The illustrative masterplan has sought to retain the existing boundary hedges and trees.

Connectivity
The illustrative masterplan has sought to connect to the existing Public Rights of Way creating positive pedestrian/cycle linkages from the development into Tickhill.

Residential Design
Creation of a high quality residential extension to Tickhill having its own distinct identity of appropriate scale and character for the site. More generic design principles which will be applied to the scheme are as follows:

- Character - a place with its own identity
- Continuity and enclosure - where public and private spaces are clearly distinguished
- Quality of the public realm - a place with attractive outdoor areas
- Ease of movement - a place that is easy to get to and move through
- Legibility - a place that is easy to navigate
- Diversity - a place that offers variety and choice
Conclusion

The land at Apy Hill, Tickhill provides an opportunity to deliver new housing in a sustainable location to meet the needs of the village and the wider Borough. The site is available, suitable and achievable in accordance with the Framework and represents a sustainable residential opportunity on the edge of an established residential area.

There is a need for Doncaster Council to review their Green Belt boundaries to meet the housing need and demand in the area. This Advocacy Report supports the Draft allocation of the site and agrees that there are exceptional circumstances supporting the release of the site from the Green Belt due to the urgent need to meet Doncaster’s housing need and ambitions for growth.

Framecourt Homes and Brooks Properties are promoting the site for inclusion in the Local Plan. The site is therefore available for development within the plan period. The site is in a sustainable area close to a range of services and facilities and public transport routes. The site is therefore suitable for residential development.

The technical work undertaken to date has influenced the indicative masterplan. It has also shown that there are no known constraints, that could not be suitably mitigated, that would prevent this site coming forward within the plan period. As such, the development of the site, as shown within the indicative masterplan, is considered achievable.

The indicative masterplan shows how a mix of housing can be accommodated within the site, alongside connectivity, landscaping and drainage features. The scheme will go towards meeting the housing requirement/need in the village.

Furthermore, the development of the site will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance of housing in an area is necessary for economic growth. The development of the Apy Hill scheme can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity in the Doncaster Borough.

It has therefore been shown that the site at Apy Hill provides a development opportunity that is available, suitable and achievable and that it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is deliverable within the plan period. The scheme has significant housing and economic benefits for the area and is therefore eminently suitable for allocation.
Key Benefits

Opportunity to distribute housing growth to a village within the Borough and support the sustainability of Tickhill

The delivery of circa 70 new homes in a range of house types, sizes and tenure

Circa 245 new jobs (direct and in-direct) from the construction of the residential scheme alone

Gross Value Added of around £5 million

Circa £1.7 million Annual Household Expenditure

At least £350,000 of first occupation expenditure
### Appendix 2: Sites with planning permission at April 2018.

<table>
<thead>
<tr>
<th>Site Reference</th>
<th>Capacity</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>544</td>
<td>55</td>
<td>Development has stalled, there are significant constraints. Discount from Supply</td>
</tr>
<tr>
<td>792</td>
<td>9</td>
<td>Stalled site, not considered likely to come forward. Discount from Supply</td>
</tr>
<tr>
<td>855</td>
<td>5</td>
<td>Stalled over a significant period, should not be relied on to contribute towards supply. Discount from Supply</td>
</tr>
<tr>
<td>959</td>
<td>9</td>
<td>Permission has expired. Discount from Supply</td>
</tr>
<tr>
<td>972</td>
<td>10</td>
<td>Permission has expired. Discount from supply.</td>
</tr>
<tr>
<td>979</td>
<td>5</td>
<td>No start, permission has expired. Discount from supply.</td>
</tr>
<tr>
<td>1071</td>
<td>10</td>
<td>No start recorded. Expired in 19/20 monitoring period. Discount from supply.</td>
</tr>
<tr>
<td>1077</td>
<td>9</td>
<td>Industrial units remain in place, pre start conditions have not been discharged. Permission expires August 2020. Discount from supply</td>
</tr>
<tr>
<td>977</td>
<td>10</td>
<td>Not available for residential development. Discount from supply.</td>
</tr>
<tr>
<td>1062</td>
<td>5</td>
<td>Potential viability issues. Should not be relied on to contribute towards supply. Discount from supply.</td>
</tr>
<tr>
<td>946</td>
<td>5</td>
<td>Permission has expired. Discount from supply</td>
</tr>
<tr>
<td>992</td>
<td>6</td>
<td>Permission has expired. Discount from supply</td>
</tr>
<tr>
<td>Site No.</td>
<td>Total</td>
<td>Description</td>
</tr>
<tr>
<td>---------</td>
<td>-------</td>
<td>-------------</td>
</tr>
<tr>
<td>960</td>
<td>13</td>
<td>No sign of start, permission has lapsed. <strong>Discount from supply</strong></td>
</tr>
<tr>
<td>856</td>
<td>6</td>
<td>Site appears to have stalled. Should not be relied upon to contribute towards supply. <strong>Discount from Supply</strong></td>
</tr>
<tr>
<td>951</td>
<td>28</td>
<td>No start recorded, permission expired in 18/19. <strong>Discount from supply</strong></td>
</tr>
<tr>
<td>958</td>
<td>79</td>
<td>Outline consent in 2015, no delivery on site in 18/19. <strong>Discount from supply</strong></td>
</tr>
<tr>
<td>569</td>
<td>220</td>
<td>Long standing and unimplemented permission that has been available and remains undeveloped. Lack of developer interest. The site should not be relied upon to contribute towards the supply. <strong>Discount from supply</strong></td>
</tr>
<tr>
<td>628</td>
<td>7</td>
<td>A start was recorded in 2013/14, no delivery has been recorded on site. The site has stalled. <strong>Discount from supply</strong></td>
</tr>
<tr>
<td>955</td>
<td>16 (10)</td>
<td>The capacity of this site should be reduced from 16 to 6 to reflect application 19/02787/FUL). <strong>Discount 10 units from the supply</strong></td>
</tr>
<tr>
<td>956</td>
<td>16</td>
<td>No evidence that the site can be delivered. The council have discounted this site within their latest five year supply assessment. This should not be relied on to contribute to the supply within the Plan. <strong>Discount from the supply</strong></td>
</tr>
<tr>
<td>1076</td>
<td>7</td>
<td>No start, recorded permission expires in September. Should not be relied upon to contribute towards the supply. <strong>Discount from the supply</strong></td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>524</td>
<td></td>
</tr>
</tbody>
</table>