Hearing Statement – Matter 5

Doncaster Local Plan

On behalf of Avant Homes

August 2020
1. **Introduction**

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

   **Matter 5: Housing Supply**

1.2. Avant 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 Avant Homes’ comments upon the submission version of the Doncaster Local Plan, dated September 2019.

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

2.2. Avant Homes have concerns relating to the weight attributed to community consultation responses without sufficient regard to the nature of comments and whether they form material planning considerations. Stage 7 of the Site Selection Methodology [SDEB46], indicates that this concluding stage includes feedback from the consultation responses to the 2018 consultation. It is not clear what weight or role this has had in the site selection process. For example, there are a number of sites with significant notable objections, in both context and number, are allocated, whilst sites with only a small number of objections are rejected. There are a number of sites where consultation responses are not referred to. It is therefore not possible to determine the weight attributed to consultation responses.

2.3. It is noteworthy that the Inspector’s Letter in respect of the Doncaster LDF Sites and Policies Development Plan Document [OTH ** Final Letter Stage 1 v2, June 2014] paragraph 51 expressed similar concerns in relation to the Site Selection Methodology at the time.

2.4. For example, Site 165/186, is noted within CSD 10 to have had the most objections, 465 signature petition, 203 standard letters and 27 individual responses, and yet this site is allocated. Site 234 received significantly fewer responses, 20 letters of objection, and is not allocated despite performing better than allocated Site 033 in the Sustainability Appraisal and the Council’s Green Belt assessment, according to the summary within SDEB 46. Avant Homes have reviewed the consultation summary in CSD 10 and the nature of comments
recorded for their Site 234 appear no more or less substantive than those raised in Site 165/186. However the conclusion in the Site Selection Methodology for Site 234 indicates that objections are the reason why the site is not released from the Green Belt.

2.5. Therefore, this would imply in this case greater weight is given to consultation responses, regardless of whether the responses form material considerations, than the sustainability appraisal.

2.6. Avant 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.

2.7. Avant 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’.

2.8. 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 234 Broad Axe, MUA, This performs better than MUA sites 350, 241, 164/430 and 33,

- Site 494, Green Lane, MUA. This performs better than site 836.

2.9. Taking into account the above, Avant 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.
2.10. Avant 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. Avant Homes considers there is an urgent need for a Level 2 SFRA to inform the Plan and site selection process.

2.11. 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.

2.12. 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'. Avant 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. Avant Homes have identified a number of circumstances where other 'omission sites' perform better than the identified 'Reserve Sites'.

2.13. In the Doncaster MUA three Reserve Sites are identified; Site 399, 495 and 497 – all are affected by flood risk. There are sites available in the MUA, which have developer interest, perform better within the Sustainability Appraisal, and pass the first sift of the flood risk sequential test including Site 494 and Site 234.

2.14. The approach to site selection and flood risk is not consistent with the provisions of the NPPF and NPPG.

2.15. Avant 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]

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

2.17. 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?

2.18. As explained in Matter 2, Avant 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

2.19. 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. Avant 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.

2.20. Avant 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 3 for details). This includes larger sites such as Site 544 and Site 569. By the end of the Plan period Avant 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).

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>Avant 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>
</tbody>
</table>
2.22. Avant 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

2.23. 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. Avant 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. Avant Homes consider that this supports a higher non-implementation rate for small sites, and within the defined villages. Avant Homes consider a non-implementation rate of 20% should be introduced, although this is considered conservative.

Part C

2.24. Avant 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.

2.25. Based on this the above list Avant Homes consider it would be appropriate to allow for non-implementation of allocations without permission. Avant 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.
2.26. 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><strong>Expected completions with planning permission at 2018</strong></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><strong>Expected completions on completions not in allocated sites (small sites and in defined villages)</strong></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><strong>Expected completions on allocations without planning permission</strong></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><strong>Total 2015 to 2035</strong></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

2.27. 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. Avant 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. Avant 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.

2.28. 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.

2.29. 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 additional 5 on the sites listed completed in previous years. [SDEB 26].

2.30. **Avant 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**

2.31. Avant 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.

2.32. Avant Homes consider that including 290 dwellings on top of the proposed windfall allowance of 200 dpa would constitute double counting. Avant 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.

2.33. Avant 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

2.34. Avant 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</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

2.35. 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.

2.36. 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.

2.37. 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.

2.38. 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).

2.39. Avant 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?

2.40. Avant 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?

2.41. Avant 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?

2.42. As explained in Matter 2 and Matter 3, Avant 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.

2.43. 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. Avant 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. Avant Homes consider that this will provide greater certainty to all parties.

2.44. 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.

2.45. 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?

2.46. Avant 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. Avant 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.

2.47. In terms of the sites of 10 or more dwellings, with detailed planning permission, Avant 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?

2.48. Avant 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>Council View</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. Avant Homes do not consider this site should be relied on for a source of supply within the Plan.</td>
</tr>
<tr>
<td>Reference</td>
<td>Capacity</td>
<td>Comments</td>
<td></td>
</tr>
<tr>
<td>------------------</td>
<td>----------</td>
<td>------------------------------------------------------------</td>
<td></td>
</tr>
<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>
<td></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>
<td></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>
<td></td>
</tr>
<tr>
<td>14/02462/PIAPA</td>
<td>1</td>
<td>Start recorded in 14/15, however no completions recorded to date.</td>
<td></td>
</tr>
</tbody>
</table>

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

2.50. Avant 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. Avant 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. Avant 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.

2.51. 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.

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

2.52. Avant 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.
2.53. 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.

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

2.55. Avant 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?

2.56. 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, Avant 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 capacity with 10% post lapse rate.</th>
<th>Spawforths</th>
</tr>
</thead>
<tbody>
<tr>
<td>786</td>
<td>707</td>
<td>537 (-249)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>B) Sites of 10 or more with detailed planning permission</th>
<th>Deliverable capacity with 10% post lapse rate.</th>
<th>Spawforths</th>
</tr>
</thead>
<tbody>
<tr>
<td>3,449</td>
<td>3,104</td>
<td>3,209 (-240)</td>
</tr>
</tbody>
</table>
C) Sites of 10 or more dwellings with outline planning permission

<table>
<thead>
<tr>
<th></th>
<th>1,314</th>
<th>1,183</th>
<th>1,029 (-285)</th>
</tr>
</thead>
</table>

D) Sites with a grant of planning permission in principle

<table>
<thead>
<tr>
<th></th>
<th>119</th>
<th>119</th>
<th>114 (-5)</th>
</tr>
</thead>
</table>

E) Allocations without planning permission

<table>
<thead>
<tr>
<th></th>
<th>1,561</th>
<th>1,405</th>
<th>1,405 (-156) (10% non implementation)</th>
</tr>
</thead>
</table>

F) Windfall Allowance

<table>
<thead>
<tr>
<th></th>
<th>1,000</th>
<th>1,000</th>
<th>400 (-600)</th>
</tr>
</thead>
</table>

G) Total

<table>
<thead>
<tr>
<th></th>
<th>8,229</th>
<th>7,518</th>
<th>6,694</th>
</tr>
</thead>
</table>

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

**Site 494, Green Lane, Doncaster MUA**

2.58. Avant Homes suggests that Site 494 at Green Lane, Scawthorpe should be allocated and should be identified as a housing site.

2.59. The site at Green Lane, Scawthorpe is located on the western edge of Doncaster close to major employment opportunities along the A1(M). The site is therefore in a sustainable and appropriate location for housing growth. New housing should be located on the western side of Doncaster to ensure Doncaster maximises the economic growth potential of these major inward investors.
2.60. The Green Lane, Scawthorpe site should therefore be allocated to deliver housing in the short term. A robust Green Belt boundary can be created utilising Green Lane and the Roman Road along the western boundary. This is a distinctive and long term urban boundary.

2.61. Avant 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.

2.62. The deliverability and benefits of the Green Lane, Scawthorpe site are contained in the attached Advocacy Report.

**Site 871 – Wadworth**

2.63. **Avant Homes suggests that Site 871 at Wadworth Hill, Wadworth be allocated for housing.** Wadworth is a large village with services and facilities located close to the southern edge of Doncaster. The settlement can therefore accommodate some new housing and should also be positioned further up the settlement hierarchy. Furthermore, opportunities for growth at Tickhill from the Site Options currently considered appear limited with sites rejected due to site constraints. Tickhill and Wadworth are in relative close proximity and have good linkages and therefore the settlements work together. Wadworth is also well related to Doncaster Main Urban Area and the Main Urban Area is accessible via a range of sustainable transport modes. Notwithstanding that there should be allocations in smaller settlements which serve a wide hinterland. Particularly where this will enhance or maintain or enhance the vitality of rural communities. Paragraph 78 of the Framework indicates that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. **Avant Homes therefore proposes that their site at Wadworth Hill, Wadworth (HELAA Site 871) be allocated for housing.**

2.64. Avant Homes considers the 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.

2.65. The deliverability and benefits of the Wadworth Hill, Wadworth site are contained within 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?

2.66. Avant Homes has no specific comment in relation to this issue.

Proposed Change

2.67. 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, 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 494, Green Lane, Doncaster MUA
- Allocate Site 871 – Wadworth.
Appendix 1: Green Lane Advocacy Report
Introduction

The land at Green Lane, Scawthorpe presents a sustainable development opportunity to provide new housing for Doncaster. The site is being promoted by Avant Homes as a development opportunity that can deliver approximately 500 dwellings.

Background
This advocacy document has been produced for the site at Green Lane, Scawthorpe.

The site is being advocated to Doncaster Metropolitan Borough Council (DMBC) as part of the Local Plan Review. This document presents information to support the allocation of this site and to underline the site’s deliverability credentials.

The site is located to the north-west of Scawthorpe in an area currently designated as Green Belt. It is circa 20 Ha in area. The site is within 5 mins walk (400m) from Great North Road / York Road with good access to major bus routes. It is also approximately 1 mile from Scawsby local centre.

The site is to the north of a site which is being promoted through the Local Plan and was previously a Draft local Plan allocation. The Green Lane site completes the urban block with this allocation utilising Green Lane and the Roman Ridge to provide a new robust Green Belt boundary.

The site is well con...There is Rosedale Primary School within 5 minutes walk of the site and both Don Valley Academy and Ridgewood School within 0.5 miles offering secondary and sixth form education.

The A638 Great North Road / York Road is close to the site and provides direct routes into Doncaster Town Centre, approximately 2.5 miles to the south-east. Barnsley Road (A630) to the south provides access to the A1(M) Junction 37 less than 2.5 miles from the site to the west. Great North Road (A638) also continues through Adwick le Street to the north before providing access to the A1 Junction 38 just over 3.5 miles from the site. This gives the site easy access to local and regional employment opportunities.

The site is adjacent to existing housing to the south-east. Green Lane forms a strong northern boundary to the site. The Roman Ridge to the west also forms a robust boundary for heritage reasons as well as due to the significant planting alongside it.

The site represents a highly sustainable development opportunity with access to existing facilities and services. It is a logical extension to the urban area of Doncaster and supports the continued housing and economic growth of the town.

Objectives
The key objectives of the scheme are to:
• Bring forward suitable Green Belt land for development.
• Provide new public open space and improve pedestrian and vehicular linkages
• Deliver in the region of 500 new homes to meet the needs of the Borough.
• Support an attractive neighbourhood in Doncaster.

Scope
The scope of this document is to set out the credentials for land at Green Lane, Scawthorpe as a residential development opportunity and to seek its allocation as a housing site through the Local Plan Review. This is set in the context of the opportunity that the site provides to contribute towards delivering new housing for Doncaster and the economic growth aspirations for the wider Borough.
DONCASTER UNITARY DEVELOPMENT PLAN

Key for Map Areas 2 to 9

Key

- Site
- Adjacent Site
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, 2019 (The Framework) states that local authorities should meet their objectively assessed housing needs in full and boost significantly the supply of housing. The Local Plan – Publication Version 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 on a key route between the Region and the east coast ports. Doncaster is an integral part of the Sheffield City Region (SCR) and its ambitious growth aspirations. The SCR Strategic Economic Plan sets out the plan 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 SCR 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 SCR 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 attract and retain a skills base that supports inward investment 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 Framework, Ministerial statements and budgets recognise the importance of housing and significant economic imperative of encouraging new development proposals within appropriate and sustainable locations. The planning system plays a crucial role in this approach to facilitating new development proposals. NPPG recognises that a wide range of settlements should play a role in delivering sustainable development in rural areas, and does not support blanket policies that restrict housing development in some types of settlement without robust evidence.

Doncaster is a sub-regional centre providing a sustainable location comprising a wide variety of housing, commercial and employment opportunities and good rail and road connections to the wider area. Scawthorpe is within the Doncaster Main Urban Area within the emerging Doncaster Local Plan. The Main Urban Area is required to provide 50% of the housing growth (6,805-7,315 homes).

The Green Lane site 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 Doncaster.
DMBC UDP Map 3 1998 with Green Belt highlighted and Site Identified

Key

- Site
- Adjacent Site
Available and Suitable: Green Belt

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. There is opportunity to review the Green Belt in the surrounding area to positively use the Green Belt and meet the housing need for Doncaster.

Available
Avant Homes control the land at Green Lane, Scawthorpe. The land is therefore available in accordance with national guidance. The site and the adjacent site to the south are a logical location to grow Doncaster and Avant Homes have direct frontage onto Green Lane. There are no landownership, legal or other constraints which would restrict the availability of the site for housing use. The site is therefore available and does not rely on third party land to be delivered.

Suitable: Green Belt
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 considers that Green Belt boundaries can change “in exceptional circumstances” as part of a Local Plan review. 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.

The site performs a limited Green Belt function and the release of this site and the adjacent site would help to establish a more appropriate and robust Green Belt boundary utilising Green Lane and the Roman Ridge. The sites development will have limited impact on the openness of the Green Belt. The site and the adjacent site to the south are bounded the urban area.

The proposed Green Belt boundary is would accord with the Framework and ensure the Green Belt is well defined for the long-term. Green Lane and the Roman Ridge are distinct features beyond which the urban edge will not encroach, thus ensuring permanency is maintained.

The Green Lane site is therefore a unique opportunity to meet the housing need and economic growth aspirations whilst delivering significant benefits for the area. When identifying the adjacent site at Draft Local Plan Stage the Council has stated that “The site has been found to have a moderate case for inclusion in further site selection work by the Phase 3 Green Belt Review” and that the Green Lane site (although rejected along with the adjacent site) “has been identified as performing the same through the Green Belt Review Phase 3 as other sites at the settlement which are being proposed for allocation, there are sites that perform slightly better through the Sustainability Appraisal and sufficient allocations now identified”. It is considered that Green Lane and the adjacent site are both appropriate housing sites.

It is clear that development of the site would not have a material impact on the Green Belt. The development of this site will not have a significant impact on any of the reasons for the Green Belt designation in the area. The new Green Belt boundaries will be drawn to provide a long term robust boundary. The development will not result in the coalescence of neighbouring towns, and will not encroach on the countryside nor affect the setting and special character of an historic town. Therefore, although the site is in the Green Belt it is a logical scheme with significant major benefits.

Green Lane, Scawthorpe is a site that does not perform any of the five Green Belt functions and as such is an appropriate site for release to deliver additional housing allocations for the Borough and the Doncaster Main Urban Area.
Comprehensive Settlement Analysis Plan 1:5,000

SITE

Adjacent Potential Housing Site

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 (Grade II)
- Public Open Space (Informal)
Suitable: Settlement Analysis

The Green Lane site is located to the west of Scawthorpe in Doncaster borough. The site is within walking distance to Great North Road which leads directly to Doncaster city centre. Along the Great North Road there are a number of community facilities. There are also numerous bus services which pass close to the site connecting the area with central Doncaster.

The proposed site is located on the north-west edge of Scawthorpe adjacent to the urban area and a number of existing facilities.

The Great North Road / York Road (A638) and Barnsley Road (A635) provides a number of services and facilities including convenience and retail shopping. There are also medical facilities at Amersall Road, employment opportunities within and around Danum Retail Park, along Pipering Lane and Barnsley Road. There are also regular buses to Doncaster Town Centre and a Park and Ride facility within walking distance of the site.

There is number of primary schools to the south of the site within the walking distance: Stone Hill School (0.8 miles), Rosedale Primary School (0.8 miles), Scawthorpe Sunnyfields Primary School (1.2 miles). The Castle Hills Primary School (0.9 mile) to the east of the site is approximately 20 minutes walk from the site.

The closest secondary school is Don Valley Academy (0.4 mile) to the east and Ridgewood School (1.2 mile) to the south which are located approximately 10 minutes to 24 minutes walk.

The bus services along York Road, close to the site providing up to five buses in half an hour into Doncaster Town Centre in morning hours.

Doncaster Railway Station is 3.5 miles from the site and can be reached following a 23 minute bus ride from York Road. Bentley Railway Station is 1.6 miles from the site and can be reached following a 7 minute car drive from Green Lane.

Doncaster station is extremely well connected by the East Coast Mainline with services to London (2 hrs), Leeds (33 mins), Newcastle (1:30 hrs), Manchester Airport (1:44 hrs), York (20 mins), Sheffield (26 mins), Penzance (7:45 hrs) and Hull (50 mins) among other places. The ease of access to the station from the site using public transport adds to the sustainability of the site.

<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>1 mile</td>
<td>10 mins Bus</td>
<td>Barnsley Road</td>
</tr>
<tr>
<td>Local Shop(s)</td>
<td>1 mile</td>
<td>10 mins Bus</td>
<td>Barnsley Road</td>
</tr>
<tr>
<td>Post Office</td>
<td>3 miles</td>
<td>28 mins Bus</td>
<td>Nether Hall</td>
</tr>
<tr>
<td>Library</td>
<td>1 mile</td>
<td>20 mins Walk</td>
<td>Amersall Road</td>
</tr>
<tr>
<td>Town Centre</td>
<td>2.5 miles</td>
<td>23 mins Bus</td>
<td>Doncaster</td>
</tr>
<tr>
<td>GP Surgery</td>
<td>1 mile</td>
<td>20 mins Bus</td>
<td>Amersall Road</td>
</tr>
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</tr>
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<td>1.8 miles</td>
<td>15 mins Bus</td>
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<td>5 mins Walk</td>
<td>Rosedale Primary</td>
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<tr>
<td>Secondary School</td>
<td>0.4 miles</td>
<td>5 mins Walk</td>
<td>Don Valley Academy</td>
</tr>
<tr>
<td>Park / Playground</td>
<td>1.3 miles</td>
<td>15 mins Bus</td>
<td>Roman Ridge</td>
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<td>Sports Pitches</td>
<td>1.3 miles</td>
<td>13 mins Bus</td>
<td>Langdale Drive</td>
</tr>
<tr>
<td>Bus Stop</td>
<td>0.2 miles</td>
<td>4 mins Walk</td>
<td>Tickhill Road</td>
</tr>
<tr>
<td>Train Station</td>
<td>2.5 miles</td>
<td>23 mins Bus</td>
<td>Doncaster</td>
</tr>
</tbody>
</table>
Site Photograph Location Plan
View from the Green Lane looking towards the eastern boundary of the site. The image shows on the left the existing housing stock and open views of the site with the hedge on horizon identifying the southern boundary of the site.

The existing housing stock off Green Lane dominated by the feature of water tower.

Western boundary of the site is framed by Roman Ridge.

View from the site Roman Ridge towards the site.

View of the site from Sycamores Drive.

View from the site off Green Street toward the nearby agricultural land.
Site Photographs

1. New housing development accommodating predominately bungalows at the boundary with the site.

2. Site view off Roman Ridge towards the southern boundary defined by hedge seen on the horizon.

3. View along the hedgerow crossing the site towards the housing off Charter Drive.

4. Image of the housing stock at Charter Drive.

5. Distant view of the site off Barnsley Road.

6. Typical housing stock located between York Road and Barnsley Road.

7. Large detached dwellings at Charter Drive.

8. York Road with the mature tree line and large detached residential properties along it.
Site Issues & Opportunities Plan 1:2,500

KEY
- Opportunity for Vehicular Access
- Public Right Of Way-Roman Ridge
- Existing Residential Units
- Employment Uses
- Footpath
- Opportunity for connection to Public Right of Way
- Landmark Feature
- Closest Existing Bus Stops
- Existing Green Spaces and Routes
- Obscured Views
- Desirable views from site
- Hedge

1. Opportunity for Vehicular Access
2. Public Right Of Way-Roman Ridge
3. Existing Residential Units
4. Employment Uses
5. Footpath
6. Opportunity for connection to Public Right of Way
7. Landmark Feature
8. Closest Existing Bus Stops
9. Existing Green Spaces and Routes
10. Obscured Views
11. Desirable views from site
12. Hedge
Achievable: Site Issues & Opportunities

The Green Lane Site at Scawthorpe is provides a number of opportunities which any proposed development can utilise in order to add to the Scawthorpe neighbourhood and to integrate the development into Doncaster.

The Site
The total site is approximately 20ha located to the north west of Scawthorpe.

Topography
The site slopes gently from the high point on the northern boundary to the low point in the south-western corner. The southern boundary is defined by a matured hedge separating the site from the potentially future developable land. The Roman Ridge along the western boundary with the existing vegetation screens the views to the adjacent farm land.

The site abuts to the established housing development on the east.

From the northern boundary of the site there are long distance views north

Access
There is opportunity for vehicular access from Green Lane on the northern boundary of the site. There is also opportunity for the site to be accessed through the adjacent land to the south to deliver a comprehensive development for the area.

The Roman Ridge on the western boundary of the site provides opportunity for pedestrian and cycle connections into Doncaster from the site.

Ecology
As part of an active farm the site has very little ecological value across the majority. However there are areas, at the edges where hedgerows and trees provide opportunity for habitat.

Transport
The site is well served by existing bus services with regular services on Great North Road linking the site with central Doncaster.

Facilities
The site is extremely well located to allow for the new residents to live sustainably. There is easy access to schools, shops, libraries, etc within 10 mins walk of the site. Connections to these facilities will be facilitated within the development.
Illustrative Masterplan - not to scale

- Housing overlooking Roman Ridge
- Opportunities for pedestrian and cycle connections to the Roman Ridge
- Public Open Space forms a focus for the new and existing residents
- SUDS at lowest point of site
- Housing overlooking Green Lane and fields to the north
- Housing overlooking public open space with views into Doncaster
- ADJACENT DEVELOPMENT SITE
The land at Green Lane, Scawthorpe provides a residential development opportunity in a sustainable location close to shops, services and community facilities to meet the needs of urban 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 Avant Homes, as developer. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG).

**Suitability**
The proposed site utilises a distinct element of the existing Green Belt which forms a wedge between the urban neighbourhood areas of Scawthorpe and Scawsby. The allocation of this site along with the site to the south, being advocated by Strata Homes forms a logical “rounding” of the urban area in an area of Doncaster where new homes are attractive to the market. Green Lane and the Roman Ridge Road form robust boundaries to contain the growth of Doncaster in this area and maintain separation from Highfields, to the north. The development of the site will be an efficient use of land to provide quality development and new homes for the Doncaster Main Urban Area.

The site is located in a highly sustainable location and has residential development to the south, east and west. The site is within easy walking distance to local facilities at Barnsley Road and Amersall Road with a range of facilities provided in these locations. There are also greater facilities within Doncaster Town Centre, a short bus ride away. There are a large number of primary and a secondary schools in the vicinity of the site.

The site is well served by buses providing opportunities for sustainable travel to work in Doncaster and beyond with access to Doncaster Railway Station.

The development will provide additional quality development that will benefit the Doncaster and wider district with economic, environmental and social benefits. It is therefore considered that the development is suitable.

**Achievable**
The technical assessments undertaken to date 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 Green 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 which will create sustainable local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity in Doncaster.

**Summary**
The site at Green 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 Avant Homes and is deliverable within the plan period.
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. The Roman Ridge to the east of the site will be reinforced and providing a buffer separating the development from the disused railway embankment. These elements of the masterplan will help to integrate the extended urban edge into Scawthorpe.

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

**Highways Layout**
The main vehicular site accesses will be located on Green Lane with internal loop roads within the proposed development.

**Drainage**
It is proposed that the Sustainable Urban Drainage solution be at the lowest point of the site and stored within swales.

**Ecology**
The proposed development seeks to reinforce the existing habitat routes through the site along the edges with additional hedge and tree planting.

**Public Open Space**
The main public open space (POS) within the development lies on the southern edge of the site. This will enable the public open space to function as a resource for the wider community and support the integration of the two development sites into the existing neighbourhoods. Being alongside the Roman Ridge pedestrian and cycle route will enable connections between the development and the Roman Ridge.

**Access**
The masterplan allows for pedestrian/cycle linkages through the site to the Roman Ridge on the western boundary. This route will provide opportunity for the new residents to walk or cycle to the Local facilities and into Doncaster.

**Residential Design**
Creation of a high quality residential extension to Scawthorpe 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 Green Lane provides an opportunity to deliver new housing in a sustainable location to meet the needs of the Doncaster Main Urban Area 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 proposes the allocation of the site and 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.

Avant Homes control the site and are promoting it for inclusion in the Local Plan. The site is therefore available for development within the plan period along with the adjacent site to the south. The sites are 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 is being promoted by Avant Homes and will go towards meeting the housing requirement/need in the area.

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 Green 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 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 Green Lane 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 promoted by a national house builder (Avant Homes) and 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

- Optimum location to assist in the continued growth of the Doncaster Main Urban Area
- The delivery of circa 500 new homes in a range of house types, sizes and tenure
- Circa 1,750 new jobs (direct and in-direct) from the construction of the residential scheme alone
- Gross Value Added of around £35.61 million
- Circa £12.38 million Annual Household Expenditure
- At least £2.5 million of first occupation expenditure
Appendix 2: Wadworth Advocacy Report
Doncaster

WADWORTH HILL, WADWORTH

DELIVERY STATEMENT - SEPT 2019
The land at Wadworth Hill, Wadworth presents a sustainable development opportunity to provide much needed new housing for Wadworth and Doncaster. The site is being promoted by Avant Homes as an opportunity that can deliver circa 225 dwellings.

The site is to the southwest of Doncaster, on the north eastern fringe of the village of Wadworth in an area currently designated as Green Belt. It is physically separated from the wider Green Belt by the A1(M). The site is circa 7.9 hectares and can accommodate in the region of 240 dwellings across the whole site.

Immediate to the east/north east is the A1(M) and to the west is the A60. Existing residential development is located to the south west with fields and allotments to the south east. The A60 provides access to Doncaster and Tickhill, and has good access to bus routes serving Doncaster.

Within Wadsworth the site approximately 280m to Wadworth Village centre, and just over 630m to Wadworth primary school.

The site comprises five pasture fields, which are delineated by mature hedgerows, some with mature trees within them, particularly the fields to the north. The site slope from south to north.

**Objectives**
The key objectives of the scheme are to:
- Bring forward suitable Green Belt land for development
- Deliver in the region of 225 new homes to meet the needs of the Borough.
- Support an attractive extension to the village of Wadsworth
- Provide new public open space.
- Support existing facilities

**Scope**
This Advocacy Report will set out the context and ambitions for the site at Wadworth Hill, Wadworth.

Before analysing and explaining the sites justification for Green Belt release, demonstrating that the site is sustainable, available, suitable, achievable and therefore deliverable in the context of the National Planning Policy Framework (the Framework).

An indicative masterplan for the site shows the potential for the site including green infrastructure, movement and connectivity. The masterplan shows a scheme based on the number of technical assessments including highways, ecology, flood risk and drainage, noise, air quality and heritage. 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 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, 2019 (The Framework) states that local authorities should meet their objectively assessed housing needs in full and boost significantly the supply of housing. The Local Plan – Publication Version 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 on a key route between the Region and the east coast ports. Doncaster is an integral part of the Sheffield City Region (SCR) and its ambitious growth aspirations. The SCR Strategic Economic Plan sets out the plan 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 SCR 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 SCR 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 attract and retain a skills base that supports inward investment 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 Governments priorities. The Localism Act, The Framework, Ministerial statements and budgets recognise the importance of housing and significant economic imperative of encouraging new development proposals within appropriate and sustainable locations. The planning system plays a crucial role in this approach to facilitating new development proposals. NPPG recognises that a wide range of settlements should play a role in delivering sustainable development in rural areas, and does not support blanket policies that restrict housing development in some types of settlement without robust evidence.

Doncaster is a sub-regional centre providing a sustainable location comprising a wide variety of housing, commercial and employment opportunities and good rail and road connections to the wider area. Wadworth is located just beyond the Doncaster Main Urban Area within the emerging Doncaster Local Plan. The Main Urban Area is required to provide 50% of the housing growth (6,805-7,315 homes). Wadworth is identified as a defined village, and noted as being one of the highest scoring settlements in the Settlement Background Paper and is well connected to the Main Urban Area via a range of sustainable transport options. Wadworth has the potential to support the delivery of housing in the Borough, providing choice.

The Wadworth site represents an opportunity to provide a range of housing in a suitable and sustainable location to go towards delivering the much needed new homes in the Borough and supporting the long term viability and vitality of Wadworth.
Available

Avant Homes control the land at Wadworth Hill, Wadworth. The land is therefore available in accordance with national guidance. The site is a logical location to grow Wadworth and Avant Homes have direct frontage onto the A60. There are no landownership, legal or other constraints which would restrict the availability of the site for housing use. The site is therefore available and does not rely on third party land to be delivered.
Suitable: Green Belt

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. The proposed housing allocation to the northern fringe of Wadworth is an opportunity to review the Green Belt and positively use the Green Belt to meet the housing needs for the area.

The site at Wadworth performs a limited Green Belt Function and its release would help to establish a more appropriate and robust green belt boundary utilising the existing natural and manmade features including the A1(M) and A60. The site will have limited impact on the openness of the Green Belt, due to the topography of the area and significant tree and hedgerows to the boundaries.

The proposed Green Belt boundary would accord with the Framework and ensure the Green Belt is well defined for the long-term. The A60 and A1(M) are distinct features beyond which the settlement edge will not encroach, thus ensuring permanency is maintained.

It is an opportunity to meet the housing need and economic growth aspirations whilst delivering significant benefits for the area and the village.

It is clear from the site location plans and analysis that the development of the site would not have a material impact on the Green Belt. The development would not have an impact on any of the reasons for Green Belt designation.

In the Borough of Doncaster approximately 46% of the area is presently designated as Green Belt. The Framework considers that Green Belt boundaries can be changed in 'exceptional circumstances' as part of Local Plan review. Exceptional circumstances exist through the significant need to provide housing to meet the housing need and economic growth aspirations. The council has stated it will revise the Green Belt boundaries for the emerging Local Plan and beyond to provide new boundaries with some permanence.

The new Green Belt boundary will be drawn to provide a long term robust boundary. The development will not result in the coalescence of neighbouring towns, and will not encroach on the countryside. It will not affect the setting and special character of a historic town.

The Wadworth site does not perform any of the five Green Belt functions, and the boundaries are clearly defined using physical features that are readily recognisable. The site is contained and further landscaping and careful consideration of the building heights, mass, and siting will further limit any potential visual impact of the development. As such is an appropriate site for release to deliver additional housing allocations for the Borough.
Comprehensive Settlement Analysis Plan 1:7,500

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 Buildings
- Conservation Area
- Parks and Gardens of Special or Local Historic Interest
Suitable: Settlement Analysis

The Wadworth Hill site is located to the north east of Wadworth a large village in Doncaster Borough. The site abuts Wadworth Hill (A60) which leads to Doncaster to the north and Tickhill to the south. Along the A60 there are a number of community facilities and bus services.

Wadworth is a large elevated village and civil parish in the Metropolitan Borough of Doncaster. It is organised around the Church of St. John the Baptist, which has medieval origins, and the mid-18th century Wadworth Hall (both Grade I listed).

The elevated position of the village means that the church spire is visible across a wide area and there are views out of the conservation area to the north and east towards Doncaster.

The site abuts Wadworth Hill (A60) which leads to Doncaster to the north and Tickhill to the south. Along the A60 there are a number of community facilities and bus services.

The proposed site is located to the north of Wadworth. The site is contained between the A1 (M) to the north-east, the A60 to the west and housing to the south. It does not impinge on Wadworth Conservation Area. A Public Right of Way crosses the site, passing under the A1(M) before connecting to Sewage Works at Burn Hill.

Wadworth has a small range of local shops including a Foodstore, Chinese Takeaway, Butchers shop, Coffee shop and a Pub. They also have a local community centre and local church all of which are in easy walking distance of the site. Slightly further afield lies New Edlington to the Northwest and Balby to the north which offer a wider range of facilities including Doctors, Dentists, Opticians and Hospital.

Primary education is provided by Wadworth Primary School which lies to the south of the village and is approximately 7 - 10 minutes walk (500m) from the site. The closest secondary school is the Sir Thomas Wharton Academy in Edlington which lies to the west of the site approximately 20 - 25 minutes cycle.

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 Wadworth Hill, adjacent to the site, provide bus services every 12 minutes throughout the day into Doncaster Town Centre.

Doncaster Railway Station is approximately 4.5 miles from the site and can be reached following a 15 minute bus ride.

### ACCESS TO FACILITIES

<table>
<thead>
<tr>
<th>Facility</th>
<th>Distance to closest (miles)</th>
<th>Approx. journey time (mins)</th>
<th>Location</th>
</tr>
</thead>
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<tr>
<td>Local Shop</td>
<td>0.19 miles</td>
<td>4 mins walk</td>
<td>Wadworth</td>
</tr>
<tr>
<td>Supermarket</td>
<td>1.98 miles</td>
<td>3 mins drive</td>
<td>Woodfield Way, Doncaster</td>
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<tr>
<td>Post office</td>
<td>4 miles</td>
<td>8 mins drive</td>
<td>Edlington</td>
</tr>
<tr>
<td>Library</td>
<td>4 miles</td>
<td>8 mins drive</td>
<td>Edlington</td>
</tr>
<tr>
<td>GP</td>
<td>4 miles</td>
<td>8 mins drive</td>
<td>Edlington</td>
</tr>
<tr>
<td>Hospital</td>
<td>2 Miles/ 4 miles</td>
<td>4 / 8 mins drive</td>
<td>Tickhill Road Hospital/ Doncaster Royal infirmary</td>
</tr>
<tr>
<td>Dentist</td>
<td>4 miles</td>
<td>8 mins drive</td>
<td>Edlington</td>
</tr>
<tr>
<td>Nursery</td>
<td>0.8 miles</td>
<td>16 mins walk</td>
<td>Loversall</td>
</tr>
<tr>
<td>Primary School</td>
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<td>9 mins walk</td>
<td>Wadworth</td>
</tr>
<tr>
<td>Secondary School</td>
<td>1.6 miles</td>
<td>9 mins drive</td>
<td>Edlington</td>
</tr>
<tr>
<td>Park/ Playground</td>
<td>0.37 miles</td>
<td>6 mins walk</td>
<td>Osberton Street/ Wadworth Hall Lane</td>
</tr>
<tr>
<td>Sports Pitches</td>
<td>0.35 miles</td>
<td>6 mins walk</td>
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</tr>
<tr>
<td>Bus Stop</td>
<td>0</td>
<td>Next to the site</td>
<td>A60 Wadworth Hill, Site entrance.</td>
</tr>
<tr>
<td>Train Station</td>
<td>3.7m</td>
<td>15 mins bus</td>
<td>Doncaster</td>
</tr>
</tbody>
</table>
Site Photographs

1. View across the site towards the northern boundary.

2. View along Wadworth Hill Road.

3. Panoramic view of the site towards the northern boundary from public right of way.

4. View east, towards the A1(M) from the site.

5. View from the eastern boundary looking north.

6. View alongside the A1(M).

7. View of the site from within the site looking south towards the public right of way.
Site Photographs

View of A60 along the western site boundary at the junction with White Cross Lane.

View of the site towards the northern boundary.

View of the hedge defined pasture field and woodland lining the A60.

View of northern boundary of the site along A1(M).

View of A1(M) towards north.

View off Wadworth Hill Road towards the sites current access point.

View of the playground located at the southern boundary with the site.

Panoramic view across the farming fields of the site from the southern corner.
Opportunity for Vehicular Access
Footpath
Existing Bus Stops
Existing Green Spaces and Routes
Tree Belt
Hedgerow
A1(M) Noise Source
Sewage Works and Pumping Station
Sewage pipe (approx. route)
Conservation Area
Listed Building
Historic Park and Garden
Public House
Shops
Church
Achievable: Site Issues & Opportunities

The total site is approximately 7.5 hectares located on the northern edge of Wadworth. The site is bounded by the A60 on the west, and to the north/north-west by the A1(M), existing residential development bounds the site to the west/south-west with further arable land to the east. There are established hedgerows and trees to the site boundaries particularly the boundary with the A1(M) and A60.

**Topography**
The site slopes from the south/south west to north with the southern boundary being approximately 43m dropping to approximately 22m at the northern most corner of the site. The A60 Wadworth Hill Road rises in relation to the site levels towards the northern corner of the site where it crosses over the A1(M) on an over bridge.

**Access**
The A60 is a long road abutting the edge of the site to the west providing opportunities for highway access. There are opportunities to provide further pedestrian access to Ratten Row and or Osberton Street.

**Ecology**
The main ecology/habitats are within hedgerows surrounding the site and bounding individual fields. Hedgerows will be maintained where practicable.

**Transport**
The site is well served by existing bus services with regular services along the A60 linking the site with Doncaster, Tickhill and Worksop.

**Ground conditions**
Current investigations do not highlight any areas of concern regarding ground conditions.

**Drainage**
Infiltration drainage techniques are unlikely to be successful on the site due to the underlying ground conditions. Connections to the local surface water sewer system along with attenuation will be the most appropriate solution for the site.

**Noise**
Mitigation will be provided along the boundary of the site with the A1(M) to minimise the impact of noise on the residential development.

**Air Quality**
Mitigation will be provided the A1(M) and the sewerage pumping station and wastewater treatment works to minimise the impact of air quality concerns.

**Heritage**
Wadworth Conservation Area and St John the Baptist Church (Grade I listed building) are located within the vicinity of the site. However, visibility to the church from the site will be limited due to the intervening, existing buildings and trees. Where possible views to the church tower will be created.
Ecology

The site comprises a number of grassland fields separated by hedgerows and fence lines. The grasslands did not show signs of recent management and had become relatively diverse. The hedgerows were dominated by native species. Scattered scrub and trees present around the site.

There was no evidence of protected species found during the survey.

The hedgerows comprised of over 80% native species and would therefore be classed as a Priority Habitat. Trees, scrub and hedgerows provide potential for nesting birds and nesting birds could use the grassland. The report notes that hedgerows should be retained where possible and replacement planting should be considered. Two trees at the site were noted to contain features potentially suitable for roosting bats and should be retained if practical.

Use of native species in any proposed landscaping, incorporation of bat and bird boxes into new buildings. The site will need to consider the net gain in biodiversity for the site.

There are no ecological constraints which would prevent the development of the site.

Flood Risk and Drainage

The site is not at risk of flooding, it is located within Flood Zone 1 by the Environment Agency.

The site falls south to north and the government flood mapping shows that the south-western boundary to have a low risk of surface water flooding however the risk of this is low.

As the site is greenfield, surface water runoff shall be restricted to the existing greenfield runoff rate for the site.

A Severn Trent Foul Sewer crosses the site, and this will be either incorporated into the proposed site layout or diverted.

Sustainable Drainage Systems of Infiltration drainage is unlikely to be viable for this site based on the borehole logs, the presence of watercourses and the evidence of overland surface water flows. This does not preclude the use of preamble surface, conveyance swales, and rain gardens to improve water quality prior to attenuation and subsequent discharge to a watercourse/public sewer.

Based on the information currently available the site is suitable for development.
Air Quality

The site is not located within, or in the vicinity of an existing Air Quality Management Area (AQMA). Being in a rural area background pollutant concentrations are likely to be well below the current air quality standards. However the site is adjacent to two major roads the A1(M) and A60, which are likely to be the main sources of pollution locally.

The development should be shaped to mitigate the impacts of air pollution of residents.

Odour

There is a sewerage pumping station located at the southern boundary of the site and a wastewater treatment works circa 200m to the east of the site. Which could potentially lead to odour impacts on future residents.

The careful design and layout of the site will mitigate the impacts of any odour for future residents.

Noise

Noise monitoring was undertaken at two locations, one to the western boundary of the site and one at the eastern corner of the site. To the western boundary the dominant sources of noise was the road traffic from the A60 and A1(M). To the east the dominant source of noise was road traffic on the A1(M).

Careful consideration will need to be given to the design of the site together with appropriate boundary mitigation, glazing and ventilation. With a suitable mitigation in place internal daytime and night time noise level criteria could be met across the entire site.

The following mitigation may provide suitable solutions to noise concerns:

To the west of the site: the installation of acoustic barrier either around the site perimeter or garden areas, through careful consideration of siting of dwellings with proposed gardens on the screened side of dwellings and the introduction of a buffer zone between the road and proposed dwellings, A buffer from the A1(M) and the installation of an acoustic barrier along the boundary of the A1(M).
Site Access

Access Location Plan

Viewport 1

Viewport 1 (NTS)

1. Do not scale this drawing. All dimensions must be checked/verified on site. If in doubt ask.

2. This drawing is to be read in conjunction with all relevant architects, engineers and specialists drawings and specifications.

3. All dimensions in millimetres unless noted otherwise. All levels in metres unless noted otherwise.

4. Any discrepancies noted on site are to be reported to the engineer immediately.

Notes Key Plan

U:\LDP\LDP2312_Wadworth Hill, Doncaster\02. Project Delivery\01. WIP\Drawings\WDH-BWB-GEN-XX-DR-TR-100_Access Arrangements_S2_P2.dwg
Achievable: Highways and Access

The Access Strategy considers how the site is to be accessed and identified that a single point of access can be provided from Wadworth Hill (A60). This access can be designed to align with local design guidance, South Yorkshire Residential Design Guide (July 2015) and manual for roads and bridges. The overall strategy will provide the site with pedestrian and cycle connectivity in order to integrate the development with Wadworth.

Pedestrian Infrastructure and Accessibility
There is an established network of footways on the residential streets surrounding the site. There is a continuous footway along the western side of the A60 towards Loversall. The footway on the eastern side of the A60 is approximately 1.3m wide and ends near the bus stop opposite Rockcliffe Drive.

A review of the Council’s definitive map shows that there is a public right of way through the site. The will be incorporated into the layout or diverted.

Cycle Infrastructure and Accessibility
The Doncaster cycling map shows that there are a network of cycle routes in the vicinity of the site, consisting of a mix of advisory routes and traffic free paths, connecting Wadworth with Rossington, New Edlington and Doncaster. Presenting opportunities for future residents to access local amenities by cycling.

Highways
The A60 to the west of the site is a two way single carriageway with a 60 mph speed limit which reduces to 30 mph to the south of the site towards the village. Access is proposed to be 30m north of Rockcliffe Drive Junction this maintains sufficient stagger distance away from the junction to avoid potential road safety issues.

A suitable vehicular access to the site can be achieved. This will tie in with the existing footway along the A60 and future secondary/emergency access to the north. The appropriate visibility splays can be achieved within the extent of the adopted highway. It may be necessary to relocate the existing south bound bus stop.
### Designated Heritage Assets

**Listed Assets**

<table>
<thead>
<tr>
<th>No.</th>
<th>National Heritage List No.</th>
<th>Description</th>
<th>Designation Status</th>
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<tbody>
<tr>
<td>1</td>
<td>1151504</td>
<td>St John the Baptist Church</td>
<td>Grade I</td>
</tr>
<tr>
<td>2</td>
<td>1151505</td>
<td>Long Farmhouse</td>
<td>Grade II</td>
</tr>
<tr>
<td>3</td>
<td>1151506</td>
<td>West Lodge (now dwelling), Wadworth Hall</td>
<td>Grade II*</td>
</tr>
<tr>
<td>4</td>
<td>1151508</td>
<td>White Cross Farmhouse, White Cross Lane</td>
<td>Grade II</td>
</tr>
<tr>
<td>5</td>
<td>1151512</td>
<td>Two barns south west of Long Farmhouse, Carr Lane</td>
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<tr>
<td>6</td>
<td>1193411</td>
<td>New Farmhouse, Carr Lane</td>
<td>Grade II</td>
</tr>
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<td>Sundial 20m S of Wadworth Hall</td>
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<td>8</td>
<td>1193428</td>
<td>East Lodge (now dwelling), Wadworth Hall</td>
<td>Grade II*</td>
</tr>
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<td>9</td>
<td>1193466</td>
<td>White Cross Farm buildings, White Cross Lane</td>
<td>Grade II</td>
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<td>1240138</td>
<td>Former wagon shed to southwest of Long Farmhouse, Carr Lane</td>
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<td>11</td>
<td>1314832</td>
<td>Pigsty south of Long Farmhouse, Carr Lane</td>
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<td>1314863</td>
<td>Wadworth Hall</td>
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<tr>
<td>13</td>
<td>1314864</td>
<td>Gate Piers and Walls, Wadworth Hall</td>
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**Scheduled Assets**

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<td>Scheduled</td>
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<tr>
<td>15</td>
<td>1004834</td>
<td>Edlington Wood Double Dyke</td>
<td>Scheduled</td>
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</table>
Achievable: Heritage

Wadworth is a historic village with an extensive Conservation Area and a number of listed buildings within it. The site is separated from the Conservation area by more recent development and the location at the bottom of the hill limits the opportunities for views to the historic buildings.

The village of Wadsworth lies to the south west of the site. The historic core has retained its early post medieval character, and is a designated conservation area. New housing estates have been formed along the southern, western boundaries of the site, between the site and the historic core of Wadworth. Development will not directly impact upon the significance of any designated heritage asset.

The proposed site is in an area which has some evidence of early prehistoric activity, including evidence for occupation found at Edlington Woods which lies to the northwest. There have been a number of crop marks found within the wider area, dating to the Iron age and Romano British period.

By the medieval period the site was in agricultural use. This use continues to today. Other than the enclosure of the field little activity has occurred within the site other than the construction of the Doncaster Bypass in the late 1950’s and early 60's. Stripping activities associated within this may have some localised impact on the potential archaeological deposits/features.

St John the Baptist Church
Whilst not within the immediate setting of the Grade I listed church of St John the Baptist the site is close to the church and the eastern arm of the Conservation Area of Wadsworth and forms part of the extended historic landscape setting to it. The main body of the church is screened from views within the site. There are some views of the very upper section of the church tower from within the site, but these are interrupted by intervening landscape form and tree cover.

The proposed development will not impact upon the building or diminish the values attributable to the immediate setting of the Church.

Any impacts on the wider historic openness to the setting of the church and views of the upper sections of the tower will be mitigated through careful consideration of the siting, building orientation and building scale in order to maintain views to the church tower were possible.

Wadworth Conservation Area
The site holds limited prominence in the context of the conservation area given the intervening landscape form.

Open space will be utilised to maintain views into the eastern arm of the conservation area.
Key Design Principles Plan 1:2,500

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

Buffer to A1(M) provides screening and SUDS.

Buffer to A60 provided by existing tree belt.

Buildings face onto open space and look into conservation area.

Connection to public right of way.

POS provides continuation with existing green space.

Connection to public right of way.
Development Principles

The approach to the masterplan is to provide housing that integrates with the surroundings and makes the most of the surrounding landscape, heritage assets and pedestrian links. The existing green buffer to the A1(M) and the A60 will be enhanced. These elements of the masterplan will help to integrate the development with the village of Wadsworth.

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

Highways Layout
The main vehicular access will be on A60, with internal loop, with secondary access on A60 proposed to support the development of the whole site.

Drainage
It is proposed that the sustainable drainage solution include permeable surfaces, conveyance swales, rain gardens prior to attenuation and discharge to the nearby watercourse, where possible, and public sewers.

Trees and Public Open Space
The main public open space will be to the south of the site, supporting visual links to be made with the conservation area. Trees will be used within the scheme to identify key pedestrian routes, and will be used to enhance the buffers to the A1(M) and A60. Open spaces through the site will be created through the careful orientation of buildings to open up views to the tower of St John the Baptist Church, which will serve to enhance legibility within the scheme itself and to its surroundings.

Ecology
The masterplan has sought to enhance the existing boundary treatment. Retaining hedgerows where appropriate and where enhancement is necessary this can be planted with appropriate native species. The hedgerows to the open space at the south of the site will be retained.

Access
The masterplan allows for pedestrian/cycle linkages through the site to existing residential streets, and the wider footpath and cycle network, encouraging sustainable movement in the area.

Noise and Air Quality
The masterplan creates a buffer area alongside the A1(M) and around the sewerage pumping station to mitigate against potential noise, air quality and odour impacts.

Residential Design
Creation of a high quality residential extension to Wadworth with 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 area
- Ease of Movement – a place that is easy to move through
- Legibility – a place that is easy to navigate
- Diversity – a place that offers variety and choice
Indicative Phasing Plan 1:2,500

- Phase 1
- Phase 2

KEY
- Phase 1
- Phase 2
Viability and Phasing

Avant Homes pride themselves on delivering high quality homes and places where people want to live. Avant Homes have an excellent track record of delivery and have ambitious plans to deliver 4000 homes/per annum for sale in the UK. Wadworth Hill, Wadworth can be phased to deliver 110 homes initially with a further 115 in a later phase.

Avant Homes intend to dovetail the planning application and site development with the Local Plan timetable this will enable the delivery of housing within the local plan period. Avant Homes will submit a planning application early Autumn 2020. Planning permission including section 106 would be expected in April 2021. On site groundworks would be expected to commence in May 2021 with the first legal completion to follow in autumn 2022. Delivery is expected to be through a single outlet on site delivering in the region of 30-35 dwellings a year. The scheme can therefore be delivered within the first half of the plan period.

There are no anticipated infrastructure delivery requirements that will impact on the timescales for delivery. Whilst the whole site is capable of being delivered within the Plan period, the indicative masterplan, demonstrates that the site can also be logically phased. Avant Homes consider that the first phase of around 100 dwellings can come forward early in the Plan period, and if the whole site is not allocated, the remainder of the site should be safeguarded or reserved. The phase 2 site is deliverable and therefore can be released within the Plan period to ensure a sufficient supply of housing is maintained.

Viability

The Framework places great emphasis upon the importance of viability (para 67) and considers that policies should “take into account availability, suitability, and likely economic viability”.

With regards to viability and plan making the Guidance states that: “…Policy requirements should be informed by…a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, transparent and publicly available.” It is therefore important then that requests from the Local Authority are proportionate considering the stage of Local Plan production and potential costs in terms of commissioning technical reports associated with demonstrating viability.

Avant Homes do not consider from the information presently available that there are any insurmountable viability issues on this site which will prevent its development for much needed housing.
Illustrative Masterplan 1:2,500

- WADWORTH HILL (A60)
- SUDS at lowest point of site
- New tree planting within buffer from A1(M)
- Public Open Space connects into existing routes and playground
- Terraced properties provide acoustic screening
- POS provides separation from sewerage pumping station
- Housing looking over POs towards conservation area
- Vehicular entrance
- Emergency Access Opportunity
- POS provides separation from sewerage pumping station
- Housing looking over POs towards conservation area
- Public Open Space connects into existing routes and playground
Deliverable

The land at Wadworth Hill, Wadworth provides a residential development opportunity in a sustainable location close to shops, services and community facilities to meet the needs of urban Wakefield. 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 Metroland Ltd as landowner. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG).

**Suitability**
The proposed site utilises a distinct element of the existing Green Belt which is separated from the wider Green Belt by the disused railway line to the south which provides a topographic feature separating the site from the wider Green Belt as well as screening views between the site and the wider Green Belt. The development of the site will be an efficient use of land to provide quality development and new homes for the Doncaster Main Urban Area. The site is identified for development within the Draft Doncaster Local Plan.

The site is located in a highly sustainable location and has residential development to the north, east and west. The site is within easy walking distance to Springwell Lane Local Centre with a range of facilities provided there as well as greater facilities within Doncaster Town Centre, a short bus ride away. There are a large number of primary and a secondary schools in the vicinity of the site.

The site is well served by buses providing opportunities for sustainable travel to work in Doncaster and beyond with access to Doncaster Railway Station.

The development will provide additional quality development that will benefit the Doncaster and wider district with economic, environmental and social benefits. It is therefore considered that the development is suitable.

**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. The site has interest from Persimmon Homes and Ongo (Registered Provider).

**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 Alverley 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 which will create sustainable local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity in Doncaster.

**Summary**
The site at Alverley 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 Metroland Ltd with interest in development from Persimmon Homes and Ongo and is deliverable within the plan period.
Conclusion

The land at Wadworth Hill provides an opportunity to deliver new housing in Wadworth to meet the needs of Wadworth supporting its long term vitality and viability and meet the needs of the wider Borough. The site is available, suitable and achievable in accordance with the Framework. It presents a deliverable residential opportunity on the edge of an existing village.

There is a need for Doncaster council to review their Green Belt boundaries to meet housing need and demand in the area. This advocacy supports the allocation of the site and agrees and considers that there are exceptional circumstances supporting the release of the site from the Green Belt due to the need to meet Doncaster’s housing need and ambitions for growth. No robust reason to restrict the development of Large Villages such as Wadworth. Support Vitality and viability.

Avant Homes are promoting the site for inclusion in the Local Plan. The site is therefore available for residential development within the Plan period. The site is in a suitable location, close to a range of facilities and services and public transport routes and is suitable for residential development.

The technical work undertaken to date has influenced the indicative masterplan. It has shown that there are no known constraints, that could not be suitably mitigated or that would prevent this site coming forward within the plan period. As such the development of the site as shown in 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 is being promoted by Avant and will go towards meeting the housing requirement/need in the area.

The development 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 Wadworth Hill scheme can support local economic growth through both direct job growth through the construction phase but also through increased population which will create sustainable local jobs from the increased demand for goods and services. This provides important sustainable development in the Borough but importantly support the long term vitality and viability of Wadworth including the viability of the Primary School (capacity 210, current no. of pupils 149 (July 19)).

It has therefore been shown that the site at Wadworth Hill provides a development opportunity that is available, suitable, and achievable and it is considered deliverable, in accordance with the national planning policy and guidance. It is promoted by Avant homes, the fastest growing house builder in the UK and is deliverable within the plan period. The scheme has significant housing and economic benefits for the area and therefore suitable for allocation.
Key Benefits

- Optimum location to assist in the continued growth of the Doncaster Borough

- The delivery of circa 225 new homes in a range of house types, sizes and tenure

- Circa 790 new jobs (direct and in-direct) from the construction of the residential scheme alone

- Gross Value Added of around £16.03 million

- Circa £5.57 million Annual Household Expenditure

- At least £1.13 million of first occupation expenditure
**Appendix 3: 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. <strong>Discount from Supply</strong></td>
</tr>
<tr>
<td>792</td>
<td>9</td>
<td>Stalled site, not considered likely to come forward. <strong>Discount from Supply</strong></td>
</tr>
<tr>
<td>855</td>
<td>5</td>
<td>Stalled over a significant period, should not be relied on to contribute towards supply. <strong>Discount from Supply</strong></td>
</tr>
<tr>
<td>959</td>
<td>9</td>
<td>Permission has expired. <strong>Discount from Supply</strong></td>
</tr>
<tr>
<td>972</td>
<td>10</td>
<td>Permission has expired. <strong>Discount from supply</strong>.</td>
</tr>
<tr>
<td>979</td>
<td>5</td>
<td>No start, permission has expired. <strong>Discount from supply</strong>.</td>
</tr>
<tr>
<td>1071</td>
<td>10</td>
<td>No start recorded. Expired in 19/20 monitoring period. <strong>Discount from supply</strong>.</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. <strong>Discount from supply</strong></td>
</tr>
<tr>
<td>977</td>
<td>10</td>
<td>Not available for residential development. <strong>Discount from supply</strong>.</td>
</tr>
<tr>
<td>1062</td>
<td>5</td>
<td>Potential viability issues. Should not be relied on to contribute towards supply. <strong>Discount from supply</strong>.</td>
</tr>
<tr>
<td>946</td>
<td>5</td>
<td>Permission has expired. <strong>Discount from supply</strong></td>
</tr>
<tr>
<td>Code</td>
<td>No.</td>
<td>Description</td>
</tr>
<tr>
<td>------</td>
<td>-----</td>
<td>-------------</td>
</tr>
<tr>
<td>992</td>
<td>6</td>
<td>Permission has expired. Discount from supply</td>
</tr>
<tr>
<td>960</td>
<td>13</td>
<td>No sign of start, permission has lapsed. Discount from supply</td>
</tr>
<tr>
<td>856</td>
<td>6</td>
<td>Site appears to have stalled. Should not be relied upon to contribute towards supply. Discount from Supply</td>
</tr>
<tr>
<td>951</td>
<td>28</td>
<td>No start recorded, permission expired in 18/19. Discount from supply.</td>
</tr>
<tr>
<td>958</td>
<td>79</td>
<td>Outline consent in 2015, no delivery on site in 18/19. Discount from supply</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. Discount from supply.</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. Discount from supply.</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). Discount 10 units from the supply</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. Discount from the supply.</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. Discount from the supply.</td>
</tr>
<tr>
<td>TOTAL</td>
<td>524</td>
<td></td>
</tr>
</tbody>
</table>