Hearing Statement – Matter 5

Doncaster Local Plan

On behalf of H. Burtwistle & Son

August 2020
I. **Introduction**

1.1. This is a Hearing Statement prepared by Spawforths on behalf of H. Burtwistle & Son in respect of:

   Matter 5: Housing Supply

1.2. H. Burtwistle & Son 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 in **bold** for ease of reference. The following responses should be read in conjunction with H. Burtwistle & Son comments upon the submission version of the Doncaster Local Plan, dated September 2019.

1.4. H. Burtwistle & Son 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. H. Burtwistle & Son have concerns about the approach to site Selection Methodology. In Matter 1 we have raised significant concerns in relation to the Site Selection Process.

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

2.3. Burtwistle & Son has noted a number of occasions where rejected sites perform as well as or better than sites that are proposed to be allocated and sites that are proposed as ‘Reserve Sites’.

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

- **Site 244//331, Coulman Road, Thorne. This performs better than site 81/343 and 396.**
2.5. Taking into account the above, H. Burtwistle & Son are concerned that the Sustainability Appraisal and Sustainability Appraisal Addendum do not therefore seem to have consistently informed the Plan, and SDEB 46 is not sufficiently clear to provide clarity for the role of the Sustainability Appraisal in the site selection process.

2.6. H. Burtwistle & Son 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. H. Burtwistle & Son considers there is an urgent need for a Level 2 SFRA to inform the Plan and site selection process.

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

2.8. This appears to be the view in Thorne-Moorends, where a site that has failed the first sift of the sequential test, and therefore should have fallen out of the process, has been reconsidered and allocated (Site 396). Significantly other sites which perform better than Site 396 in the Sustainability Appraisal but also have failed the first sift of the sequential test have not been reconsidered (such as Site 244/331). It appears Site 396 has only been reconsidered due to its consideration in the Neighbourhood Plan, rather than adopting a consistent approach to the site selection for Thorne and reviewing all sites that perform well in the Sustainability Appraisal and allocation should be informed by Level 2 SFRA.

2.9. Site 081/343, is located within Flood Zone 3, and indeed has been subject to flood warnings, including danger to life alerts. A review of the Site Selection methodology indicates that this site has not been subject to the Flood Risk Sequential Test within the Plan, it is stated that this is due to a post base date planning application. H. Burtwistle & Son note that there is now a resolution to grant permission, however, at the point of submission this planning application had not been determined. A site specific Flood Risk Assessment had been undertaken, however the sequential test therein only includes a limited range of sites within Thorne. It is noted that policy response expressed concerns with the Sequential Test. If the test as set out in the Councils Site Selection methodology was applied this site would fail the first sift, as the adjacent site has. The Response to PQ11 confirms that an exception test would be required.
It is clear that a Level 2 SFRA is critical to ensuring that a consistent approach to site selection is taken in Thorne.

2.10. 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’. H. Burtwistle & Son 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. H. Burtwistle & Son have identified a number of circumstances where other ‘omission sites’ perform better than the identified ‘Reserve Sites’.

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

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

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

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

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

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

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

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

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

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

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

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

c) 6,630 new homes being built on allocations without planning permission at 2018?
2.15. As explained in Matter 2, H. Burtwistle & Son considers there is a need to revise the strategic aim to reflect a requirement that is consistent with the economic growth in the Plan and a review of the underlying assumptions. Furthermore, we note that there is a need to extend the Plan period by a minimum of an additional year. As a result, we consider that the strategic aim should be to deliver a minimum of \(1,100\) homes per annum, which would equate to 22,000 homes in the plan period between 2015-2035 and \(23,100\) dwellings for a plan period between 2015 and 2036.

Part A

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

2.17. H. Burtwistle & Son 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 H. Burtwistle & Son 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>H. Burtwistle &amp; Son 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/ 0-5 of the Plan.</td>
</tr>
<tr>
<td>418</td>
<td>Unity/DN7 Initiative</td>
<td>1015</td>
<td>The site has outline planning permission for 3,100 homes and 20/01197/REMM – details of appearance, landscaping, layout and scale for a estate road from Hatfield Links Road into Unity Connect, Awaiting Decision. Discharge of Conditions in relation to drainage submitted on 4th May 2020. The site is in significant multiple ownership and we understand that CPO procedures will be employed to facilitate the delivery of requisite infrastructure. Homes England is also assigning public funding to support the development. Given the presence of multiple landowners, the need for considerable public funding, the likelihood of a protracted timeframe to open up the site for development and the absence of confirmed market interest, the site is unlikely to deliver the Council’s prediction of 1015 homes in the plan period. The Council anticipates delivery of 175 dwellings in years 0-5 of the Plan SDEB26 confirms that there was no delivery in 2018/19. SDEB27 notes that works on Junction 5 M18 Link are underway and due to be complete in summer 2020 Indicated that this should facilitate the delivery of new homes and commercial uses. The road is now understood to be complete by the end of 2020, and open in 2021. As such the rates are overly optimistic especially when compared to annual completions for individual sites recorded in the residential land availability report. As the Reserved matters are awaiting approval, first completions would not be anticipated until 2021/22 reducing the level of supply anticipated in years 0-5 of the Plan.</td>
</tr>
<tr>
<td>1057/ANP</td>
<td></td>
<td>400</td>
<td>The latest RLA indicates that there was no delivery in 18/19. A Reserved Matters has been submitted (20/01421/REMM). The decision is pending. There is little evidence to support the delivery of 280 dwellings in the remaining years of years 0-5 of the Plan.</td>
</tr>
</tbody>
</table>
2.19. H. Burtwistle & Son consider that there is sufficient evidence to justify a minimum of a 10% non-implementation rate, reducing the forecast supply from allocations with permission by 930 dwellings to 8,360, however this could feasibly be higher given the history and constraints of a number of sites.

Part B

2.20. The 585 new homes built on other commitments is based on 83 commitments in defined villages, and 502 units on schemes of up to 4 units across the district. H. Burtwistle & Son 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. H. Burtwistle & Son consider that this supports a higher non-implementation rate for small sites, and within the defined villages. H. Burtwistle & Son consider a non-implementation rate of 20% should be introduced, although this is considered conservative.

Part C

2.21. H. Burtwistle & Son has reviewed the allocations without planning permission. We consider there is insufficient evidence demonstrate that there is a reasonable prospect of the following sites coming forward.

- Site 1028 – This site appears to have no viable access, it requires on the acquisition of garages to facilitate the access, which will impact on viability, along with mitigation associated with noise and air quality issues. Discount 74 dwellings.
- Site 795 – this site has previously had permission which has since lapsed. There is little evidence of developer interest in the site. Discount 13 dwellings.
- Site 510 – this site is a narrow and constrained infill site with little evidence of developer interest. Discount 25 dwellings.
- Site 133 - The RLA has indicated that the site capacity will be reduced by 50% to respond to concerns by Historic England. Discount 12 dwellings.
- Site 835 – this site will not come forward as identified in the Plan, a recent application reduced the capacity of the site. Discount 4 dwellings to reflect latest planning consent.

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

2.23. It is noted that the supply attributed to completions appears to be resultant from gross completions rather than net completions. The Plan indicates that completions between 2015 and 2018 equate to 3,400 homes. However, data in the Residential Land Availability Report indicates that net completions amount to 3,211 dwellings which would serve to increase the residual requirement based on an OAN of 920 dwellings to at least 15,189 dwellings, and reduce the flexibility in the Plan to 866 dwellings (4.7%), which is insufficient for a Borough seeking growth.

<table>
<thead>
<tr>
<th></th>
<th>Council Figures</th>
<th>Spawforths</th>
<th>Comments/justification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Net Completions 2015-2018</td>
<td>3,400</td>
<td>3,211</td>
<td>Spawforths have used the completions set out in the RLA, based on the 'net completions RLA methodology' figures is 3,211 dwellings. The Council have used the figure for net additions to Council tax stock, and not based on the RLA methodology which identifies whether there are other reasons for the new Council tax data. In using this wider data for completions there is an increased likelihood the level of completions has been over inflated in the supply.</td>
</tr>
<tr>
<td>Expected completions with planning permission at 2018</td>
<td>9,289</td>
<td>8,360</td>
<td>Allows for 10% non-implementation rate, in line with evidence on lapsed/stalled sites.</td>
</tr>
</tbody>
</table>
**Hearing Statement: Matter 5 – Doncaster Local Plan, H. Burtwistle & Son, August 2020**

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

a) a windfall allowance of 3,400 new homes, or some other figure?

b) 290 windfalls at Defined Villages?

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

d) New homes at Doncaster Sheffield Airport? Should any such housing completions count towards achieving the aim of delivering 18,400 new homes in the Plan period?

### Part A

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

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

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

2.27. H. Burtwistle & Son does not consider that there is enough evidence to support the inclusion of an additional 3,400 dwellings arising from windfalls into Table 5.

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

2.29. H. Burtwistle & Son consider that including 290 dwellings on top of the proposed windfall allowance of 200 dpa would constitute double counting. H. Burtwistle & Son 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 Arksley, Blaxton, and Fishlake. This could serve to further limit the viable options in those locations.

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

Part C

2.31. H. Burtwistle & Son 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>
</tbody>
</table>
Windfalls at Defined Villages (policies 2 and 3) & 290 & 0 (included within windfall allowance, and extant permissions within defined villages will contribute to growth limits)

Windfalls on sites identified in the brownfield register 2019 & 197 & 0 (double counting)

Total windfalls & 3,887 & 2,600

**Part D**

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

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

2.34. Paragraph 4.40 of the PBA report states that the Council could base its uplifted target on the jobs led scenario, it goes on to note that this would not have to be 1,073 resultant from full achievement of the SEP target (1% growth, considered by PBA to be consistent with the core growth airport masterplan scenario), but could adopt a lower number. It is stated that this is because the target is considered as ambitious and the jobs growth and housing demand predicted by the policy might not be realised. The requirement in the Plan is 920 dwellings, thus below the target that reflects the full achievement of SEP ambitions of 1% jobs growth.
2.35. Policy 7 sets out a ratio between jobs growth and housing delivery, establishing the level of jobs growth that would be required to support an additional 1,200 homes at the airport. Based on the Council’s methodology, 10,910 additional jobs would be required at the airport to support the delivery of 1,200 homes. This level of jobs growth is significantly over and above the core jobs growth assumptions (a growth of 4,963 jobs) that was considered by PBA to be consistent with the 1% jobs growth assumptions that inform the policy on housing growth target. As noted above the housing requirement of 920 dwellings is not based on the full achievement of the SEP growth ambitions (including core growth from the airport).

2.36. H. Burtwistle & Son 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?

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?

2.37. H. Burtwistle & Son consider that table 5 should be modified in line with response in Q5.2

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

2.38. H. Burtwistle & Son has no specific comment in relation to this issue.
Q5.6. Is the proposal in policy 3 to have a variable figure for the five year requirement consistent with national policy? Would it be effective in helping to ensure that the need for homes identified in the Plan can be met? If not, how should the five year requirement be calculated?

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

2.40. The Plan is seeking to deliver economic growth in line with the SEP ambitions; this is reflected within the employment requirement. As considered under Matter 2 there is sufficient evidence to justify a significant uplift to the standard methodology, in order to reflect the level of economic growth supported in the Plan and past delivery rates. In this context it is not appropriate to have a range where the lower end of that range does not align with the Plans economic growth ambitions. H. Burtwistle & Son 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. H. Burtwistle & Son consider that this will provide greater certainty to all parties.

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

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

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

2.43. H. Burtwistle & Son 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. H. Burtwistle & Son consider that the supply within category A should be reduced by 249 dwellings. This would suggest a higher non-implementation rate than the assumed 10% in SDEB 27 and in response to PQ29.

2.44. In terms of the sites of 10 or more dwellings, with detailed planning permission, H. Burtwistle & Son 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?
2.45. H. Burtwistle & Son has reviewed the details of sites with outline planning permission of 10 dwellings or more at 1st April 2019. We consider there is insufficient evidence to demonstrate that the following sites will contribute to the supply as forecast within SDEB 27.

<table>
<thead>
<tr>
<th>Reference</th>
<th>5 year capacity</th>
<th>Spawforths</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Council View</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15/01278/OUTM 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>
<td></td>
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<tr>
<td>12/00188/OUTM 280</td>
<td>210</td>
<td>A reserved matters has been submitted 20/01421/REMM. Decision Pending</td>
<td></td>
</tr>
<tr>
<td>14/00484/OUT 5 0</td>
<td>0</td>
<td>Permission has expired</td>
<td></td>
</tr>
<tr>
<td>08/01077/OUTA 140</td>
<td>0</td>
<td>History of planning, lack of developer interest in this site. H. Burtwistle &amp; Son do not consider this site should be relied on for a source of supply within the Plan.</td>
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</tbody>
</table>

**Sub Total** 705 420

**Total to be discounted** 285
2.46. In relation to sites with planning permissions in principle, H. Burtwistle & Son has reviewed the information within SDEB 27, which indicates that development has stalled on four of these sites - this amounts to 5 dwellings. This indicates that whilst only sites with starts have been included, it remains appropriate to include a non-implementation rate of circa 5%.

<table>
<thead>
<tr>
<th>Reference</th>
<th>Capacity</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>16/01087/PRIOR</td>
<td>3</td>
<td>Start was recorded in 16/17, only 1 unit completed, no completions during 18/19</td>
</tr>
<tr>
<td>15/00221/P3JPA</td>
<td>2</td>
<td>Start recorded in 15/16, 1 completion recorded, no completions in 18/19.</td>
</tr>
<tr>
<td>15/01806/PIAPA</td>
<td>2</td>
<td>Start recorded in 16/17, 1 completion recorded, no completions recorded in 18/19.</td>
</tr>
<tr>
<td>14/02462/PIAPA</td>
<td>1</td>
<td>Start recorded in 14/15, however no completions recorded to date.</td>
</tr>
</tbody>
</table>

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?

2.47. H. Burtwistle & Son 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. H. Burtwistle & Son would expect a minimum of 12-18 months from planning permission to start on site, and a further 6 months until the first completion. H. Burtwistle & Son 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.

2.48. 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?

2.49. H. Burtwistle & Son is concerned that the housing trajectory demonstrates that the Council will struggle to maintain a continuous supply of housing, particularly in the later phases of the Plan period, with only four sites capable of delivering sites towards the end of the Plan period and only two sites capable of delivering beyond the Plan period. There are a number of settlements where there is no forecast supply of housing from year 11, including the Main Towns of Adwick and Woodlands, Armthorpe, Coinsbrough and Denaby, Mexborough, Thorne- Moorends.

2.50. The trajectory indicates that from year 2028/29, delivery is anticipated to fall below the standard methodology (at 2019), at less than 500 dwellings, and by 2031/32 onwards delivery will be below 200 dwellings per annum.

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

2.52. H. Burtwistle & Son consider that the trajectory as set out in Figure 3 should be reviewed, and based on realistic assumptions of expected delivery.
**Q5.11. Does the trajectory demonstrate that the Plan will be effective in ensuring that there will be a supply of specific deliverable sites sufficient to meet an appropriately calculated five year requirement when the Plan is adopted and thereafter?**

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

<table>
<thead>
<tr>
<th>A) Sites of fewer than 10 dwellings with permission</th>
<th>Deliverable Supply 1st April 2019 to 31st March 2024 (Doncaster)</th>
<th>Deliverable capacity with 10% post lapse rate</th>
<th>Spawforths</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>786</td>
<td>707</td>
<td>537 (-249)</td>
</tr>
<tr>
<td>B) Sites of 10 or more with detailed planning permission</td>
<td>3449</td>
<td>3104</td>
<td>3209 (-240)</td>
</tr>
<tr>
<td>C) Sites of 10 or more dwellings with outline planning permission</td>
<td>1314</td>
<td>1183</td>
<td>1029 (-285)</td>
</tr>
</tbody>
</table>
2.54. Therefore, further sites need to be identified in the Borough. H. Burtwistle & Son suggest the following available, suitable and achievable sites:

**Site 244/331 Coulman Road, Thorne**

2.55. H. Burtwistle & Son suggests that Site 244/332 at Coulman Road, Thorne should be allocated and should be identified as a housing site.

2.56. The site at Coulman Road, Thorne is located on the edge of an established residential area in Thorne-Moorends and benefits from easy access to the full range of services and facilities located within Thorne-Moorends. The site is therefore in a sustainable and appropriate location for housing growth. H. Burtwistle & Son consider that the allocation of the site would support the regeneration and renewal of the settlement and assist in the economic and housing growth aspirations of the Borough.

2.57. The Coulman Road, Thorne site should therefore be allocated to deliver housing in the short term. H. Burtwistle & Son 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, including a site specific Flood Risk and
Drainage Assessment (incorporating a Sequential Assessment), and are ongoing that demonstrate the site’s deliverability.

2.58. The deliverability and benefits of the Coulman Road, Thorne site are contained in the previous representations and the attached Advocacy Report (Appendix 1).

**Site 313/245, Northgate, Thorne**

2.59. H. Burtwistle & Son suggests that Site 313/245 at Northgate, Thorne should be allocated and should be identified as a housing site.

2.60. The site at Northgate Thorne is located on the edge of Thorne, and benefits from easy access to the full range of services and facilities located within Thorne-Moorends. The site is therefore in a sustainable and appropriate location for housing growth. Additional new housing should be located within Thorne-Moorends to support the regeneration and economic growth aspirations of the Town.

2.61. The site should therefore be allocated to deliver housing in the short term. H. Burtwistle & Son 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, including a site specific Flood Risk and Drainage Assessment (incorporating a Sequential Assessment), and are ongoing that demonstrate the site’s deliverability.

2.62. The deliverability and benefits of the Northgate, Thorne site are contained in the previous representations and the attached Advocacy Report (Appendix 2)

**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?**

2.63. H. Burtwistle & Son has no specific comment in relation to this issue.
Proposed Change

2.64. 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 244/331, Coulman Road, Thorne.
Appendix 1: Advocacy Coulman Road
Thorne
COULMAN ROAD

H. BURTWISTLE AND SON
The land at Coulman Road, Thorne presents a sustainable development opportunity to provide new housing for Thorne. The site is being promoted by H. Burtwistle and Son as a development opportunity that can deliver circa 170 dwellings.

**Background**
This advocacy document has been produced for the site at Coulman Road, Thorne. The site is being advocated to Doncaster Metropolitan Borough Council as part of the Local Plan Review. This document presents information to support the site’s allocation for residential development by demonstrating its sustainability, suitability and deliverability.

**The Site**
The site is located to the north of Coulman Road, and south of Broadbent Gate Road close to King Edward Road. The site is currently designated as Countryside adjacent to the main urban area. The adjacent land is allocated for employment (south) and housing (west), both of which have been built out and established.

The site is c. 6.2Ha with access available from both Coulman Road to the south and Broadbent Gate Road which forms its northern boundary. The site is close to a range of services and facilities including Thorne King Edward Primary School which lies to the south-west.

The site is close to main bus routes on Marshland Road and King Edward Road linking to Thorne and the main Doncaster Urban Area, with bus stops in close proximity to the site. The site is c.1.5 miles from Junction 6 of the M18.

The site is adjacent to existing housing to the west and south-west, with housing a little further to the north as part of Moorends. To the south is employment development in the form of Coulman Road Industrial Estate. To the east is countryside with the site boundary defined by a culvert/drain that also forms the boundary of the Industrial Estate.

The site therefore represents a highly sustainable development opportunity with access to existing facilities and services. It is a logical extension to Thorne and supports the continued housing and regeneration of the town.

**Scope**
This Advocacy Report will set out the context and ambitions for the site at Coulman Road, Thorne before analysing and explaining the site’s justification for allocation by identifying its sustainability, availability, suitability, achievability and deliverability in the context of the National Planning Policy Framework (the Framework).

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

The land at Coulman Road, Thorne is being promoted in the context for the need for housing and economic growth in Doncaster. This will further stimulate growth and investment in the Doncaster Borough and the Sheffield City Region as well as continue the regeneration of Thorne and Moorends connected with the growth of the logistics and employment parks.

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

Doncaster is an integral part of the Sheffield City Region and the ambitious growth aspirations. The Strategic Economic Plan sets out the Sheffield City Region’s plans to transform the local economy over the next decade. At the heart of the plan is the creation of 70,000 new private sector jobs and 6,000 new businesses.

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

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

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

The current wider economic context in the country is also relevant. The economic decline and associated recovery, its impact on the housing market and increasing housing crisis means schemes that assist economic and housing growth, are high on the Government’s priorities.

Thorne and Moorends is a sustainable location comprising a wide variety of housing, commercial and employment opportunities along with a broad mix of leisure, retail and service facilities provided in a Town Centre and health, community and recreational facilities in the wider settlement. Thorne and Moorends is defined as a ‘Main Town’ within the emerging Doncaster Local Plan.

The role of Thorne and Moorends should be a focus for growth and regeneration as a Main Town linked to growth of the logistics and employment parks, given its strategic location next to the M18. There is a need for an uplift in housing for Thorne and Moorends. There is currently a significant underprovision of housing in the settlement which cannot be met through allocations in other settlements.

The Coulman Road site in Thorne represents an opportunity to provide quality housing in a sustainable location to go towards meeting the housing needs of Doncaster within a ‘Main Town’ with a Town Centre. The site is in a sustainable location, on the edge of the existing urban area. The proposed scheme would provide the opportunity for new housing to be located within an existing residential area in the vicinity of jobs, leisure, retail and public transport facilities.
Available and Suitable

The site is available, suitable and achievable and is deliverable in accordance with the Framework and represents a sustainable residential opportunity on the edge of an established residential area. The landowner H. Burtwistle & Son is promoting the site.

Availability
The land at Coulman Road, Thorne is being promoted by H. Burtwistle & Son as landowner. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG).

Suitability
The Council has established the need for new housing land to serve the needs of the district. The Council has acknowledged a need to release Green Belt land to meet the needs through a Green Belt Review. The site at Thorne is not in Green Belt and therefore should be considered favourably in this context as an appropriate release of land to meet the housing needs of the district. The site is located on the edge of the urban area adjacent to existing development including employment operations to the south and housing to the west/south west and further to the north.

The development of the site will be an efficient use of land to provide quality development and new homes for the urban area of Thorne and Moorends. The site is located in a highly sustainable location and has residential development to the north and west. The site is within easy walking distance to Thorne Town Centre with a range of facilities provided there as well as good linkage by means other than the private car including buses and trains to a greater range of facilities within Doncaster Town Centre.

There are primary and secondary schools in easy walking distance of the site. The site is well served by buses providing opportunities for sustainable travel to work in Thorne and Doncaster and beyond with access to Thorne Railway Station. The technical work that underpins the masterplan confirms that there are no known constraints to development. The development will provide additional quality development that will benefit Thorne and Moorends and the wider district with economic, environmental and social benefits. It is therefore considered that the development is suitable. It is therefore considered that the proposed allocation of the site at land at Coulman Road, Thorne is suitable, in accordance with national guidance.
Settlement Analysis

The Coulman Road site is located to the north of Thorne, a town to the north-east of Doncaster. The site is equidistant between Thorne Town Centre and Moorend Local Centre (1.5km) allowing access to a variety of shops and services. There are regular bus services that pass close to the site, providing connections to destinations including Moorend, Thorne, and Doncaster.

The proposed site is located on the northern edge of Thorne adjacent to the urban area and bounded by existing residential development. Local facilities and convenience stores are located within the existing residential areas.

The Thorne Town Centre and Moorend Local Centre provide a wide range of services and facilities, including convenience and retail shopping. Facilities include Thorne Leisure Centre, Northfield Medical Surgery, pubs and restaurants, and a number of social clubs and places of worship.

Thorne and surrounding areas offer a range of employment opportunities including the Coulman Street Industrial Estate neighbouring the site, Capitol Park retail park, and Thorne Enterprise Park. Bus routes pass by the site that operate regular services to Doncaster and to the nearby rail stations for onward connections.

King Edward Primary School and Thorne Brooke Primary School, both located to the south of the site, provide primary education. Both are situated within a 15 minute walk (1 mile) from the site. The closest secondary school is Trinity Academy, approximately 10 minute’s walk (0.6 miles) from the site.

Bus services operate along King Edward Road and Coulman Street, with the nearest bus stop approx. 550m from the site. Services operate up to three buses an hour into Doncaster Town Centre, and serve both Thorne South and Thorne North railway stations.

Thorne South Station is approx. 1.5 miles to the south of the site, while Thorne North Station is approx. 1.3 miles to the west. Thorne North operates regular services to Hull (approx. 50 mins) and Sheffield (1:07 hr). Thorne South operates regular services to Scunthorpe (23 mins) and Doncaster (20 mins).

<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>0.8 miles</td>
<td>6 mins Bus</td>
<td>Field Road</td>
</tr>
<tr>
<td>Local Shop(s)</td>
<td>0.6 miles</td>
<td>12 mins Walk</td>
<td>Marshland Road</td>
</tr>
<tr>
<td>Post Office</td>
<td>0.6 miles</td>
<td>12 mins Walk</td>
<td>Marshland Road</td>
</tr>
<tr>
<td>Library</td>
<td>0.6 miles</td>
<td>10 mins Walk</td>
<td>Marshland Road</td>
</tr>
<tr>
<td>Town Centre</td>
<td>1 mile</td>
<td>10 mins Walk</td>
<td>Thorne</td>
</tr>
<tr>
<td>GP Surgery</td>
<td>0.4 miles</td>
<td>8 mins Walk</td>
<td>Marshland Road</td>
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<tr>
<td>Hospital</td>
<td>10.3 miles</td>
<td>44 mins Bus</td>
<td>Doncaster</td>
</tr>
<tr>
<td>Dentist</td>
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<td>8 mins Bus</td>
<td>Field Side</td>
</tr>
<tr>
<td>Nursery</td>
<td>0.7 miles</td>
<td>14 mins Walk</td>
<td>Marshland Road</td>
</tr>
<tr>
<td>Primary School</td>
<td>0.5 miles</td>
<td>10 mins Walk</td>
<td>West Road</td>
</tr>
<tr>
<td>Secondary School</td>
<td>0.7 miles</td>
<td>14 mins Walk</td>
<td>Church Balk</td>
</tr>
<tr>
<td>Park / Playground</td>
<td>0.8 miles</td>
<td>16 mins Walk</td>
<td>Broomhill Court</td>
</tr>
<tr>
<td>Sports Pitches</td>
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<td>Goole Road</td>
</tr>
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<td>3 mins Walk</td>
<td>King Edward Rd</td>
</tr>
<tr>
<td>Train Station</td>
<td>1.2 miles</td>
<td>24 mins Walk</td>
<td>Thorne North</td>
</tr>
</tbody>
</table>
View from junction of King Edward Road and Broadbent Gate Road looking west towards a new housing development.

- View towards the site entrance from Coulman Road (current construction compound).
- New properties face onto Coulman Road with factory to rear.
- View north up Coulman Street.

- Broadbent Gate Road forms the northern edge of the site passed a new housing scheme.
- View showing the pylons crossing the site and factory to the southern edge of the fields.
- View from northern end of the eastern drain showing pylon within the site.
View looking west along Broadbent Gate Road showing the site and the rear of existing neighbouring housing.

View from the eastern drain which separates the neighbouring field from the site. This image shows the rear of the existing housing and the rear of the industrial buildings.

The entrance to the neighbouring industrial building

The current shrub which is in the area identified as the southern access opportunity

A bund on the northern edge of the employment land with the site beyond
BUILDINGS FACE ONTO BROADBENT GATE GATE ROAD

ACCESS OPPORTUNITY

PUBLIC OPEN SPACE

SURFACE WATER STORAGE BENEATH POS

BUFFER ALONGSIDE DRAIN

KING EDWARD ROAD
Deliverable

Consideration has been given to the constraints and opportunities with the conclusions used to inform the design process. Detailed technical reports have also been undertaken and are summarised in the following sections of this Advocacy Report.

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

The landowner H. Burtwistle and Son is actively promoting the site for development and is deliverable in accordance with the Framework and can be relied upon to deliver new homes within the emerging Local Plan.
Site Issues & Opportunities

The Site at Coulman Road provides a number of opportunities which any proposed development can utilise in order to add to the neighbourhood and to integrate the development into Thorne and Moorends.

The Site
The total site is approximately 6.29 Ha located to the east of Thorne.

Topography
The site is broadly flat with a drain cut to run east-west separating the fields being promoted and also along the eastern edge forming the site boundary on this side.

Access
Access can be achieved from Coulman Road between the new housing being constructed by Keepmoat and the existing employment building. Opportunity for vehicular access from Broadbent Gate Road at the northern edge of the site may also be possible.

No footpaths pass through the site or in the immediate vicinity of the site. There is opportunity for Broadbent Gate Road to provide direct pedestrian access to the site from King Edward Road.

Ecology
The site is of low ecological value due to its history of agricultural use.

Transport
The site is well served by existing bus services with regular services on King Edward Road.

Drainage
It is considered that Sustainable Drainage Systems or infiltration drainage techniques are unlikely to perform on the site due to the geological parameters of the natural soils. However, it will be necessary to carry out appropriate infiltration tests in line with BRE guidance.

Utilities
A large pylon is located on the eastern edge of the site with the overhead cables passing diagonally through the site. An offset will be required along the length of the run of these cables.

A surface water sewer pipe runs east-west through the site linking some existing housing to the west of the site to the drain on the eastern boundary.

Views
The flat nature of the site and the surrounding land to the east affords views into the countryside from the eastern boundary.

It is considered that connections to the local surface water sewer systems along with surface water storage will be the most appropriate solution for the site.
Analysis of potential Wildlife Corridors and Higher Value Habitat
Brooks Ecological were commissioned to carry out an ecological appraisal at land at Coulman Road, Thorne in November 2018. The site is of low ecological value owing largely to its history of agricultural use.

The site is occupied by habitats much affected by agricultural management, which are considered to be of low ecological value, and their presence should not pose a constraint to development.

The site is bordered by agricultural land to the north and east, with industrial units to the south and residential housing to the west.

Most of the site is given over to arable land which is of low ecological value and would not pose a constraint to development. The site does however lie within the 2km impact risk zone of Thorne, Crowle and Goole Moors SSSI, which will require further assessment, but there is no direct connectivity between the site and the SSSI.

The hedges present on the site’s boundaries could be retained, however any loss that is required should be compensated for through planting of new native trees and hedges elsewhere within the proposed scheme. There is likely to be buffering on the eastern edge of the site.

**Wildlife Corridors**

The M18 to the west is a significant barrier to wildlife. The major wildlife corridor through the landscape is the River Don, however this is not connected to the site and is separated from it by the M18.

Furthermore, the site is separated by arable land from Thorne, Crowle and Goole Moors SSSI/SAC/SPA, and designated local wildlife sites at Jones’ Cable and alongside the Thorne Delves railway line.

**Water Bodies**

No water bodies are visible on mapping or aerial photographs within 500m of the Site, however during the survey a SuDS pond created in the last few years was noted immediately south of the Site. There is a ditch running to the east of the site.

**Summary**

The appraisal has concluded that site is of low ecological value owing largely to its history of agricultural use. Therefore, through the site’s residential development there is the potential opportunity to enhance ecology in the area through planting of new native species.
1.0 Site Appraisal - Transport

1.1 Introduction

This Technical Note (TN) has been prepared by Curtins to support the proposed development of land for residential use, off Coulman Road in Thorne, Doncaster. The site is being advocated for new residential dwellings. This Technical Note assesses how the site will be accessed by sustainable means, demonstrating suitability and presenting an achievable highway and transport access solution.

Doncaster Council (DC) is The Local Planning and Highway Authority.

A detailed site visit was undertaken by Curtins staff on Monday 29th of October 2018. The observations and measurements taken from this visit have been used to inform this note. The site is shown in Figure 1 below.

Figure 1 – Site Location Plan

Potential to improve existing junction and visibility by widening and removing vegetation

Potential development access to studied site

Access road to be 5.5m through the removal

2m wide footways

Existing junction bell-mouth to be adopted

Viewport 1 (NTS)

Viewport 2 (NTS)
Highways and Access

Curtins have undertaken an Access Strategy for the site which concludes that the development would work with a single point of access and there are two options available. The site is seen as being in a sustainable location with access to an existing network and in reasonable proximity to the Thorne railway stations.

Highways
The main highway access will either be taken off the frontage with Coulman Road, or Broadbent Gate Road. Both of which offer good access with clear visibility.

It has been noted that both options are constrained and sub-optimal and are reliant on third-party land.

The development of the site for up to 170 properties would require either the adoption of an existing bellmouth junction to facilitate access to an existing sub-station, or, an upgrade to the existing build-up of Broadbent Gate Road to accommodate the required access to the site for vehicles, cycles and pedestrians.

Pedestrian and Cycle Infrastructure and Accessibility
Although there are no cycle facilities on the roads surrounding the site, the flat topography makes cycling an attractive mode of travel for potential residents of the development site, and residents could potentially cycle into Thorne, the schools and leisure facilities as well as cycling to the two rail stations.

The existing pedestrian infrastructure is seen to be of a good quality, though an update adjacent to the proposed highway access will be required in each case.

Summary
The site has been shown to be in a sustainable location, with existing bus stops in close proximity of the development site, as well as good access to the two rail stations in Thorne.
Flood Risk and Drainage

A preliminary Drainage Appraisal and Flood Risk Assessment was undertaken by Walker Ingram Associates in November 2018. The Environment Agency identifies the site as being in Flood Zone 3 protected by defences in an area that has had recent housebuilding. The site is also identified as having a low or very low probability of surface water flooding.

The site has no obvious fall in any direction, and surrounding area is predominantly flat. Vegetation on the site is minimal and is purely crops. However, several mature trees, extensive hedge rows and shrubs are located along all boundaries with the exception of the eastern boundary which is open onto the adjacent field.

Surface water run-off clearly discharges into the watercourse located running along the full extent of the eastern boundary of the site (Moor Drain). The nearest river is The River Don, located approximately 2.0km to the west, with the River Ouse located approximately 9.3km to the north east and the River Trent located approximately 15.3km to the east. The North Soak Drain is also located approximately 1.4km in a south westerly direction.

Defra’s Magic map website shows that the site does not lie within a Groundwater Source Protection Zone.

The Environment Agency flood map for planning shows the site is located within Flood Zone 3 and benefits from flood defences. Therefore, the site has a high risk of flooding.

The proposed development is shown to be within a very low risk area for surface water flooding, with low points along existing watercourses or depressions within the site itself shown as having low to high risk.

The Environment Agency have been consulted. It was confirmed that the risk of flooding in the area is now reduced by the presence of flood defences that the Environment Agency maintain, but there is still a residual risk of flooding if these were to breach or be overtopped by a flood greater than that for which they were designed. The site is covered by a Flood Warning.

Yorkshire Water has indicated that there is a 375mm diameter public surface water sewer crossing the site. No buildings or other obstructions are to be erected within three metres, nor trees planted within five meters of these public sewers/mains. There is a need for separate systems with foul water domestic waste to be discharged to the 450/525mm diameter public combined sewer recorded in Marshland Road, at a point to the north west of the site and it is proposed to discharge surface water to watercourse, if SuDS are not viable.

The LLFA indicated that they have no reported incidents of flooding to properties within the vicinity of the site. It was confirmed that a watercourse runs through the site and Moor Drain along the eastern boundary under the remit of the IDB (Doncaster East).

As the site is Greenfield, surface water runoff shall be restricted to the existing greenfield runoff rate for the site, calculated in accordance with IH124. On site surface water attenuation shall be incorporated into the design to accommodate all storms up to the 1 in 100 year plus 30% climate change storm duration. DMBC is not currently adopting SuDS features, although this is a policy that they are looking to implement in the future. It was confirmed that they would adopt features that solely form part of the highway drainage network.

Summary

The site in relation to flood risk and drainage matters is developable.
Development Principles

The approach of the masterplan is to provide housing which integrates with the surrounding area while making the most of the surrounding landscape and existing pedestrian links. The masterplan respects the future development of the proposed residential development to the North of the site.

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 access will be located on either Broadbent Gate Road or Coulman Road with internal loop roads within the proposed development.

Drainage
It is proposed that the Sustainable Urban Drainage solution be provided as a storage tank beneath the public open space.

Trees and Public Open Space
The main public open space (POS) within the development lies in the North-Eastern corner of the site and links into the wildlife buffer separating the new homes from the existing local wildlife site. Trees will be used within the scheme to identify key pedestrian routes.

Ecology
The illustrative masterplan has sought to provide a buffer along the eastern boundary. This buffer can be planted with appropriate native species to further enhance habitats within the area.

Access
The masterplan allows for pedestrian/cycle linkages through the site following the line of the proposed highway. Additional pedestrian links would run through the POS and connect to the countryside beyond.

Residential Design
Creation of a high quality residential extension to Thorne 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
The land at Coulman Road, Thorne is demonstrated to be a justified release from countryside policy area for allocation for residential uses and is available, suitable achievable and deliverable in accordance with the Framework. It represents a sustainable residential development opportunity to deliver new housing to meet the needs of Thorne and Moorends and the wider Borough.

The land at Coulman Road, Thorne is a site that is in countryside on the edge of the urban area of Thorne. Doncaster Council are reviewing their Green Belt boundaries in order to meet the identified housing need in the district. Sites that are not in Green Belt should be given due consideration and be considered favourably in this context. Thorne is identified as a Main Town and is a sustainable location with numerous services and facilities. The development will effectively round off the settlement in its north-east.

This Advocacy Report confirms that allocation of the site is justified to meet the urgent need for Doncaster’s housing need and ambitions for growth. H Burtwistle & Son own the site, which is therefore available for development within the plan period. The site is in a sustainable area close to a range of services and facilities and public transport routes. The site is therefore suitable for residential development.

The technical work undertaken to date has influenced the indicative masterplan. It has 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:

- The highway work confirms the suitability of the site access and highway network to accommodate the proposed development.
- The site is in an area at risk of flooding (this affects much of the eastern area of the Borough) and is subject to defences. The drainage work has identified a drainage strategy for the site. Certain measures and mitigation can be undertaken to allow delivery of housing on the site.
- Ecological survey work has confirmed there are no ecological constraints to the development of the site.

The indicative masterplan shows how a mix of housing can be accommodated within the site, alongside connectivity, landscaping and drainage features. As such, the development of the site, as shown within the indicative masterplan, is considered achievable and deliverable.

In addition, the development of the site will bring forward 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 Coulman Road, Thorne 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.

It has therefore been demonstrated that the site is a justified residential allocation and is available, suitable, achievable and deliverable for the provision of much needed housing in full accordance with national planning policy and guidance.
Key Benefits

- Optimum location to assist in the growth of and regeneration of Thorne and Moorend
- The delivery of circa 170 new homes in a range of house types, sizes and tenure
- Circa 595 new jobs (direct and in-direct) from the construction of the residential scheme alone
- Gross Value Added of around £39 million
- Circa £4.2 million Annual Household Expenditure
- Circa £0.9 million of first occupation expenditure
Appendix 2: Advocacy Northgate, Thorne
Introduction

The land at Northgate, Moorends presents a sustainable development opportunity to provide new housing for Moorends. The site is being promoted by H. Burtwistle and Son as a development opportunity that can deliver circa 400 dwellings.

Background
This advocacy document has been produced for the site at Northgate, Moorends. The site is being advocated to Doncaster Metropolitan Borough Council as part of the Local Plan Review. This document presents information to support the site’s allocation for residential development by demonstrating its sustainability, suitability and deliverability.

The Site
The site is located to the north of Northgate, and east of Marshland Road. The site is currently designated as Countryside adjacent to the main urban area.

The site is c.15.79Ha with access available from both Northgate and Chadwick Road from the south and Marshland Road to the west. The site is in an area on the northern edge of Moorends within 15 mins walk (1,100m) of Marshlands Road Local Centre with good access to major bus routes on Marshland Road to Thorne Town Centre and the main Doncaster Urban Area, with bus stops in close proximity to the site. The site is c.2.5 miles from Junction 6 of the M18.

The site is adjacent to existing housing to the south and south-west. To the east is the former Thorne Colliery with its access road forming the northern and eastern boundaries. The north-eastern boundary is defined by a railway. The site is well contained and can be further buffered.

The site therefore represents a highly sustainable development opportunity with access to existing facilities and services. It is a logical extension to Moorends and supports the continued housing and regeneration of the settlement.

Scope
This Advocacy Report will set out the context and ambitions for the site at Northgate, Moorends before analysing and explaining the site’s justification for allocation by identifying its sustainability, availability, suitability, achievability and deliverability in the context of the National Planning Policy Framework (the Framework).

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

The land at Northgate, Moorends is being promoted in the context for the need for housing and economic growth in Doncaster. This will further stimulate growth and investment in the Doncaster Borough and the Sheffield City Region as well as continue the regeneration of Thorne and Moorends connected with the growth of the logistics and employment parks in the area.

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

Doncaster is an integral part of the Sheffield City Region and the ambitious growth aspirations. The Strategic Economic Plan sets out the Sheffield City Region’s plans to transform the local economy over the next decade. At the heart of the plan is the creation of 70,000 new private sector jobs and 6,000 new businesses.

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

Furthermore, the Sheffield City Region Integrated Infrastructure Plan states: A quality housing offer has a crucial role to play in the future economic growth of the City Region.

It is essential to attracting and retaining a skills base that supports inward investment as we as meeting existing and future community needs and retention of Sheffield City Region (SCR) talent.

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

The current wider economic context in the country is also relevant. The economic decline and associated recovery, its impact on the housing market and increasing housing crisis means schemes that assist economic and housing growth, are high on the Government’s priorities. Within this context, the planning system plays a crucial role in this approach to facilitating new development proposals. Thorne and Moorends is a sustainable location comprising a wide variety of housing, commercial and employment opportunities along with a broad mix of leisure, retail and service facilities provided in a Town Centre and health, community and recreational facilities in the wider settlement. Thorne and Moorends is defined as a ‘Main Town’ within the emerging Doncaster Local Plan.

The role of Thorne and Moorends should be a focus for growth and regeneration as a Main Town linked to growth of the logistics and employment parks, given its strategic location next to the M18. There is a need for an uplift in housing for Thorne and Moorends. There is currently a significant underprovision of housing in the settlement which cannot be met through allocations in other settlements. The site at Northgate, Moorends can accommodate new housing to meet that need.

The site represents an opportunity to provide quality housing in a sustainable location to go towards meeting the housing needs of Doncaster. The site is in a sustainable location, on the edge of an existing urban area. The proposed scheme would provide the opportunity for new housing to be located within an existing residential area in the vicinity of jobs, leisure, retail and public transport facilities.
Available and Suitable

The site is available, suitable and achievable and is deliverable in accordance with the Framework and represents a sustainable residential opportunity on the edge of an established residential area. The landowner H. Burtwistle & Son is promoting the site.

Availability
The land at Northgate, Moorends is being promoted by H. Burtwistle & Son as landowner. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG).

Suitability
The Council has established the need for new housing land to serve the needs of the district. The Council has acknowledged a need to release Green Belt land to meet the needs through a Green Belt Review. The site at Moorends is not in Green Belt and therefore should be considered favourably in this context as an appropriate release of land to meet the housing needs of the district. The site is located on the edge of the urban area adjacent to existing development and is well contained by existing infrastructure including the former colliery, road, railway and landscaping.

The development of the site will be an efficient use of land to provide quality development and new homes for the urban area of Thorne and Moorends. The site is located in a highly sustainable location and has residential development to the north and west. The site is within easy walking distance to Marshlands Road Local centre and close or easily accessible by bus to Thorne Town Centre which has a decent range of facilities. There is good linkage by means other than the private car including buses and trains to a greater range of facilities within Doncaster Town Centre.

There are primary and secondary schools in easy walking distance of the site. The site is well served by buses providing opportunities for sustainable travel to work in Thorne and Doncaster and beyond with access to Thorne Railway Station. The technical work that underpins the masterplan confirms that there are no known constraints to development. The development will provide additional quality development that will benefit Thorne and Moorends and the wider district with economic, environmental and social benefits. It is therefore considered that the development is suitable. It is therefore considered that the proposed allocation of the site at land at Northgate, Moorends is suitable, in accordance with national guidance.
Settlement Analysis

The Northgate site is located on the northern boundary of Thorne and Moorends, a settlement to the north-east of Doncaster. The site is within walking distance of Moorends Local Centre (under 800m). There are also regular bus services which pass close to the site connecting the area with Thorne Town Centre and central Doncaster.

The proposed site is located on the northern edge of Moorends adjacent to the existing residential area and within walking distance of a number of existing facilities.

Moorends Local Centre on Marshland Road provides a number of services and facilities including convenience shopping, Post Office, personal services, and food outlets. In addition, Moorends has a GP surgery/pharmacy, a number of social clubs and places of worship, and a community library. Opportunities for outdoor recreation exist close to the site at Thorne Colliery Recreation Ground, and the Thorne Moors nature reserve.

Nearby Thorne offers a range of employment opportunities at the Coulman Street Industrial Estate and Capitol Park retail park, accessible via regular bus services from Moorends. Bus services also operate regularly to Doncaster Town Centre.

West Road Primary School and Thorne Moorends Marshland Primary School, both located to the south of the site, provide primary education. Both schools are within a 10 minute walk (0.5 miles) and 15 minute walk (0.7 miles) from the site respectively. The closest secondary school is Trinity Academy in Thorne, located approximately 35 minute’s walk (1.7 miles) to the south of the site, and on the main bus routes from Moorends.

The bus services along Marshland Road and Northgate, within 300m of the site, operate up to three buses an hour into Thorne Town Centre and Doncaster Town Centre as well as Thorne Retail Park, Thorne Market Place, Thorne North and South Rail Stations, Stainforth, and Doncaster centre.

Thorne North Station and Thorne South Station can each be reached by bus services within 20 minutes being 2.5 miles from the site. Thorne North Station operates regular services to Hull (approx. 50 mins) and Sheffield, (1:07 hr) while Thorne South operates regular services to Scunthorpe (23 mins) and Doncaster (20 mins).

### ACCESS TO FACILITIES

<table>
<thead>
<tr>
<th>Facility</th>
<th>Distance to closest (miles)</th>
<th>Approx journey time (mins)</th>
<th>Location</th>
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<tr>
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<td>8 mins Walk</td>
<td>The Circle</td>
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<tr>
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<td>Train Station</td>
<td>2.4</td>
<td>18 mins Bus</td>
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View looking north from the northern end of Northgate towards the Grade II listed Micklethwaite Farmhouse (not included in the site).

View from the junction of Chadwick Road and Haig Road looking north across the site.

View along Chadwick Road looking towards the site.

View east along The Avenue showing the access to the adjacent farmland.

View north-east from the level crossing on Marshland Road.
Site Photographs

6. View north on Oakmoor Road, looking towards the site.

7. View north from the farm buildings showing the railway and old colliery road passing over the railway.

8. View from the north-eastern corner of the site looking downhill towards the disused

9. View from the eastern edge of the site looking towards the railway.

10. View from north of site, where track passes under the old colliery road, looking south back towards Moorends.
Consideration has been given to the constraints and opportunities with the conclusions used to inform the design process. Detailed technical reports have also been undertaken and are summarised in the following sections of this Advocacy Report.

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

The landowner H. Burtwistle and Son is actively promoting the site for development and is deliverable in accordance with the Framework and can be relied upon to deliver new homes within the emerging Local Plan.
Site Issues & Opportunities

The Site at Northgate provides a number of opportunities which any proposed development can utilise in order to add to the Moorends neighbourhood and to integrate the development into Thorne and Moorends.

**The Site**
The total site is approximately 15.79Ha located to the north of Moorends.

**Topography**
The site is broadly flat with drains cut into the ground within and around some edges of the site. To the north the railway sits on a small embankment above the site level. A road (Goole Road) which is to the north of the site is also raised to allow it to bridge over the railway and the track which links the site to the land to the north.

**Access**
There are a number of access opportunities from the existing Moorends neighbourhood from Marshlands Road, Northgate, Chadwick road and Oakmoor Road.

No footpaths pass through the site and none are officially recorded around the site however it is known that tracks within the former colliery are utilised for walking.

**Ecology**
The site is of low ecological value owing to its history of agricultural use.

**Transport**
The site is well served by existing bus services with regular services along Northgate and Micklethwaite Road.

**Utilities**
A large pylon is located in the south-eastern corner of the site. From this pylon the electricity cables split and utilise timber pylons to traverse across the site to the north and west. An offset will be required from the large pylon. It is likely that the smaller pylons could be removed and the cables buried underground as part of the site works.

In addition a gas pipeline runs diagonally across the site from the south-eastern corner to pass beneath the railway on the north-western edge. An offset will be required to either side of this to maintain access for improvements/repairs to the pipeline.
11. Areas of higher value habitat close to the Site include an extensive tract of peat wetlands incorporating the Thorne, Crowle and Goole Moors SSSI. Designated Local Wildlife Sites on the site of a former colliery and alongside the railway line additionally lie close to the Site – these are described in more detail in the following section. The are no barriers to the movement of species between the Site and these reserves.

12. The landscape is criss-crossed by numerous drains which may be used by riparian mammals.

13. The railway line running immediately west of the Site provides a linear feature that may assist some species to commute and disperse across the landscape.

14. The M18 motorway forms a major barrier to the west of the Site.

15. The major wildlife corridor through the landscape is the River Don. Whilst this is separated from the Site by 2km of arable land and the motorway, Durham’s Warping Drain provides some link to this, passing under the major roads.

Figure 2 Analysis of wildlife corridors and higher value habitat in relation to the Site.
Brooks Ecological were commissioned to carry out an ecological appraisal at land at Northgate, Moorends in November 2018. The site is of low ecological value owing largely to its history of agricultural use.

The site is occupied by habitats much affected by agricultural management, which are considered to be of low ecological value, and their presence should not pose a constraint to development. There is a drain running through the site east to west.

The site is bordered by agricultural land to the north and east, with industrial units to the south and residential housing to the west.

Most of the site is given over to arable land which is of low ecological value and would not pose a constraint to development. The site does however lie adjacent to Thorne, Crowle and Goole Moors SSSI, which will require further assessment. The existing farm buildings will need further consideration but have been assessed as having low bat roosting potential.

The hedges present on the site’s boundaries could be retained, however any loss that is required should be compensated for through planting of new native trees and hedges elsewhere within the proposed scheme. There is likely to be buffering on the eastern edge of the site.

**Wildlife Corridors**

The M18 to the west is a significant barrier to wildlife. Designated Local Wildlife Sites on the site of a former colliery and alongside the railway line running immediately west of the site which provides a linear feature that may assist some species to commute and disperse across the landscape.

The major wildlife corridor through the landscape is the River Don. Whilst this is separated from the Site by 2km of arable land and the motorway, Durham’s Warping Drain provides some linkage to this, passing under the major roads.

**Water Bodies**

A series of water bodies are found within 500m of the Site, these being situated at Inkle Moors along either side of the railway. The closest of these lies c.70m north of the Site. Although separated from the Site by Goole Road, there is connectivity between the ponds and the Site by the railway and its wooded embankment which runs underneath the road. A series of field drains provide further connectivity across the landscape.

**Summary**

The appraisal has concluded that site is of low ecological value owing largely to its history of agricultural use. Therefore, through the site’s residential development there is the potential opportunity to enhance ecology in the area through planting of new native species.
**Access Location Plan**

- **PROPOSED WORKS**
  - 2.4m x 43.0m VISIBILITY SPLAY
  - See Detail

- **EXISTING VEGETATION TO BE REMOVED**
- **HARDENED 1m STRIP**
- **NEW 2m FOOTWAY**
- **DONCASTER - HULL LINE**

**Proposed Access (NTS)**
Highways and Access

The Highways Strategy considers how the site is to be accessed and identified that a principal point of access could be provided from Marshlands Road. Access can also be provided via Oakmoor Road and Chadwick Road to the South to allow for a potential bus loop. The overall strategy will provide the site with more than one access, which will result in greater permeability through the site and more sustainable links.

Pedestrian and Cycle Infrastructure and Accessibility

Although there are no cycle facilities on the roads surrounding the site, the flat topography of the area makes cycling an attractive mode of travel for potential residents of the development site, and residents could potentially cycle into Moorends and Thorne, the local schools and leisure facilities.

It was observed during the site visit that the existing footways, in the immediate vicinity of the development site, were in good condition and of sufficient width to allow for shared cycle and pedestrian use.

Highways

The main highway access may be taken from Marshlands Road using land adjacent to The Avenue. The proposed access would offer visibility of 43m which aligns with the requirements for the speed limit of this road.

New footways will be required on the east side of Marshlands Road for pedestrians to gain access into the new development. This would tie in with the existing footway at The Avenue.

The site has also been shown to be in a sustainable location, with existing bus stops in close proximity of the development site, although it should be noted that off-site highway works are likely to be required. Doncaster Town Centre is available via sustainable modes of transport.

Bus and Rail Service Accessibility

The site sits to the north of Moorends which is well served by local buses. The services operate on a loop with travel to Thorne and Doncaster town centre. The frequency of the service is good with buses every twelve minutes at peak times.

Access to rail services is also seen as realistic for the site with the possibility of residents taking the bus, park and ride (using on-street parking), or cycling to Thorne rail station which gives access to Doncaster, Sheffield and Hull.

Summary

The site is therefore in a sustainable and accessible location and is therefore appropriate for development.
Likelihood of flooding from Surface Water

- **Very Low**: Less than 0.1% (1 in 1,000) chance in any given year
- **Low**: Less than 1% (1 in 100) but greater than or equal to 0.1% (1 in 1,000) chance in any given year
- **Medium**: Less than 3.3% (1 in 30) but greater than or equal to 1% (1 in 100) chance in any given year
- **High**: Greater than or equal to 3.3% (1 in 30) chance in any given year

This information is shown on the Risk of Flooding from Surface Water map on our website.
Flood Risk and Drainage

A preliminary Drainage Appraisal and Flood Risk Assessment was undertaken by Walker Ingram Associates in November 2018. The Environment Agency identifies the site as being in Flood Zone 3 protected by defences in an area that has had recent housebuilding. The site is also identified as having a low or very low probability of surface water flooding.

The site and surrounding area is very flat, however, there is a slight fall to the east of the site.

Vegetation on the site is minimal and is purely crops. However, several mature trees, extensive hedge rows and shrubs are located along boundaries.

Several watercourses are located within the site, located along all boundary edges and one that crosses centrally across the site. The watercourse along the southern boundary is classified as Chadwick Dike. The nearest river is The River Don, located approximately 2.1km in a westerly direction, with the River Ouse located approximately 7.8km to the north east and the River Trent located approximately 15.1km to the east.

Defra’s Magic map website shows that the site does not lie within a Groundwater Source Protection Zone.

The Environment Agency flood map for planning shows the site is located within Flood Zone 3 and benefits from flood defences and the site, therefore, has a high risk of flooding.

The proposed development is shown to be within a very low risk area for surface water flooding, with low points along existing watercourses or depressions within the site itself shown as having low to high risk. Surface water run-off would clearly discharge into the watercourse located running through the site.

The Environment Agency have been consulted. It was confirmed that the risk of flooding in the area is now reduced by the presence of flood defences that the Environment Agency maintain, but there is still a residual risk of flooding if these were to breach or be overtopped by a flood greater than that for which they were designed. The site is covered by a Flood Warning.

Yorkshire Water has indicated that Foul water domestic waste should discharge to the 375/600mm diameter public combined sewer recorded in Northgate, at a point to the south of the site. In respect of surface water, Yorkshire Water acknowledge that it is proposed to discharge surface water to watercourse, if SuDS are not viable.

The LLFA indicated that they have no reported incidents of flooding within the vicinity of the site. It was confirmed that a watercourse runs through the site and one along the southern boundary known as Chadwick Dike under the remit of the IDB (Black Drain).

As the site is Greenfield, surface water runoff shall be restricted to the existing greenfield runoff rate for the site, calculated in accordance with IH124. On site surface water attenuation shall be incorporated into the design to accommodate all storms up to the 1 in 100 year plus 30% climate change storm duration. DMBC is not currently adopting SuDS features, although this is a policy that they are looking to implement in the future. It was confirmed that they would adopt features that solely form part of the highway drainage network.

Summary

The site in relation to flood risk and drainage matters is developable for residential use.
RAILWAY EMBANKMENT FORMS NEW URBAN EDGE

MOORENDS ROAD

KEY
• Main Access Road
• Ke Key Pedestrian Route
• Public Open Space
• Wildlife Buffer
• Vehicular Access

POTENTIAL BUFFER AREA
CONNECTION TO PUBLIC RIGHT OF WAY

ACCESS OPPORTUNITY
PUBLIC OPEN SPACE

CONNECTION TO PUBLIC RIGHT OF WAY

ACCESS OPPORTUNITY
PUBLIC OPEN SPACE
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 existing pedestrian links. A potential buffer area can be created along the eastern boundary and alongside the railway embankment, which can enhance habitats in the area. These elements of the masterplan will help to integrate the extended urban edge into Northgate.

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**
A site access will be located on Marshlands Road with internal loop roads within the proposed development. Additional access points will feed into the existing Moorends housing.

**Drainage**
It is proposed that the Sustainable Urban Drainage solution be provided as a storage tank beneath part of the public open space.

**Trees and Public Open Space**
The main public open space (POS) within the development lies in the centre of the site running along the line of the existing surface drain. Trees will be used within the scheme to identify key pedestrian routes.

**Ecology**
The illustrative masterplan has sought to provide a buffer along its eastern boundary. This buffer can be planted with appropriate native species to enhance the local ecology. A green zone to the south of the masterplan acts as a subsidiary POS and provides an additional ecological buffer adjacent to the existing Chadwick Dyke.

**Access**
The masterplan allows for pedestrian/cycle linkages through the site to the existing PROW to the north. The new links are designed to supplement the existing pathways and footpaths through the site encouraging sustainable movement in the local area.

**Residential Design**
Creation of a high quality residential extension to Northgate 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 Northgate, Moorends is demonstrated to be a justified release from countryside policy area for allocation for residential uses and is available, suitable achievable and deliverable in accordance with the Framework. It represents a sustainable residential development opportunity to deliver new housing to meet the needs of Thorne and Moorends and the wider Borough.

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:

- The highway work confirms the suitability of the site access and highway network to accommodate the proposed development.
- The site is in an area at risk of flooding (this affects much of the eastern area of the Borough) and is subject to defences. The drainage work has identified a drainage strategy for the site. Certain measures and mitigation can be undertaken to allow delivery of housing on the site.
- Ecological survey work has confirmed there are no ecological constraints to the development of the site.

The indicative masterplan shows how a mix of housing can be accommodated within the site, alongside connectivity, landscaping and drainage features. As such, the development of the site, as shown within the indicative masterplan, is considered achievable and deliverable.

In addition, the development of the site will bring forward 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 Northgate, Moorends 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.

It has therefore been demonstrated that the site is a justified residential allocation and is available, suitable, achievable and deliverable for the provision of much needed housing in full accordance with national planning policy and guidance.
Key Benefits

- Optimum location to assist in the growth and regeneration of Thorne and Moorend
- The delivery of circa 400 new homes in a range of house types, sizes and tenure
- Circa 1400 new jobs (direct and in-direct) from the construction of the residential scheme alone
- Gross Value Added of around £92 million
- Circa £10 million Annual Household Expenditure
- At least £2 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>992</td>
<td>6</td>
<td>Permission has expired. <strong>Discount from supply</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>-----------------------------------------------------------------</td>
</tr>
<tr>
<td>960</td>
<td>13</td>
<td>No sign of start, permission has lapsed. <strong>Discount from supply</strong></td>
</tr>
<tr>
<td>856</td>
<td>6</td>
<td>Site appears to have stalled. Should not be relied upon to contribute towards supply. <strong>Discount from Supply</strong></td>
</tr>
<tr>
<td>951</td>
<td>28</td>
<td>No start recorded, permission expired in 18/19. <strong>Discount from supply</strong></td>
</tr>
<tr>
<td>958</td>
<td>79</td>
<td>Outline consent in 2015, no delivery on site in 18/19. <strong>Discount from supply</strong></td>
</tr>
<tr>
<td>569</td>
<td>220</td>
<td>Long standing and unimplemented permission that has been available and remains undeveloped. Lack of developer interest. The site should not be relied upon to contribute towards the supply. <strong>Discount from supply</strong></td>
</tr>
<tr>
<td>628</td>
<td>7</td>
<td>A start was recorded in 2013/14, no delivery has been recorded on site. The site has stalled. <strong>Discount from supply</strong></td>
</tr>
<tr>
<td>955</td>
<td>16 (10)</td>
<td>The capacity of this site should be reduced from 16 to 6 to reflect application 19/02787/FUL. <strong>Discount 10 units from the supply</strong></td>
</tr>
<tr>
<td>956</td>
<td>16</td>
<td>No evidence that the site can be delivered. The council have discounted this site within their latest five year supply assessment. This should not be relied on to contribute to the supply within the Plan. <strong>Discount from the supply</strong></td>
</tr>
<tr>
<td>1076</td>
<td>7</td>
<td>No start, recorded permission expires in September. Should not be relied upon to contribute towards the supply. <strong>Discount from the supply</strong></td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td><strong>524</strong></td>
</tr>
</tbody>
</table>