Hearing Statement – Matter 5

Doncaster Local Plan

On behalf of Firsure Ltd

August 2020
1. **Introduction**

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

   **Matter 5: Housing Supply**

1.2. Firsure Ltd 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 Firsure Ltd comments upon the submission version of the Doncaster Local Plan, dated September 2019.

1.4. Firsure Ltd 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\(^5\) justified and consistent with national policy and guidance\(^6\)?

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

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

2.4. Taking into account the above, Firsure Ltd 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.
2.5. Firsure Ltd 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. Firsure Ltd considers there is an urgent need for a Level 2 SFRA to inform the Plan and site selection process.

2.6. 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.

2.7. 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’. Firsure Ltd 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. Firsure Ltd have identified a number of circumstances where other ‘omission sites’ perform better than the identified ‘Reserve Sites’.

2.8. The following reserve sites are identified in the Plan, Site 398, 399, 495, 497 and 500, all of which are affected by Flood Risk. There are sites available within Doncaster, in the MUA and other sustainable settlements, which have developer interest, perform better within the Sustainability Appraisal, and pass the first sift of the flood risk sequential test including site 302 and 305.

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

2.10. Firsure Ltd 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]

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

2.12. 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. Firsure
Ltd 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. 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 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 remain 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 081/343** – This is a longstanding allocations, with significant constraints. The site is at risk of flooding and is an area covered by ‘Risk to Life’ warnings. This site should be discounted from supply **[207 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, Firsure Ltd 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. Firsure Ltd 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. Firsure Ltd have assessed the allocations with permission at 2018. Focusing purely on applications that have lapsed, or at the beginning of August 2020, are close to lapsing, sites with no known developer interest, and sites with significant constraints which have stalled, a minimum of 524 dwellings should be discounted from the supply (Refer to Appendix 2 for details). This includes larger sites such as Site 544 and Site 569. By the end of the Plan period Firsure Ltd considers that this figure will be higher and we have significant concerns with the inclusion of Site 838 for 671 dwellings given the evidenced viability concerns identified above. There have been a number of planning applications and proposed schemes over the years but there has been no delivery on site. Countryside PLC submitted a planning application, and there is conflicting evidence in terms of delivery rates. The latest deliverable housing land supply statement confirms that application 19/01982/FULM notes a reduced capacity of 671 dwellings, and this has now been reflected in the Council’s suggested modifications. The Officer report, whilst recommending approval subject to a S106 Agreement states that the scheme is not viable, therefore delivery of affordable housing is subject to grant funding from Homes England. At the time of the report it was noted that this funding had not yet been secured (May 2020).

2.18. Furthermore, there are a number of sites that are included in the list of allocations with permission, which we do not expect to come forward at the rate forecasted within the submission Plan.
### Site Ref | Site Name | No. of Dwellings | Firsure Ltd Comment
--- | --- | --- | ---
843 | Manor Farm, Bessacarr | 1,009 | This is a Persimmon / Charles Church scheme. However, delivery has become frustrated by the need to deliver infrastructure to complete development. Since there is only one developer on the site the development trajectory is likely to be modest and development of the site is unlikely to be achieved during the plan period. The Residential Land Availability Report indicates 39 completed in 17/18, and the 2018/19 RLA indicates 56 units were delivered in 18/19. The delivery rates achieved are below the rates expected in the Local Plan and HELAA, which assumes delivery rates of around 70 dwellings a year. This is not realistic based on current delivery. 908 units remained to be delivered at end of 2018/19 monitoring period. The Deliverable Housing Land Supply Statement does not provide any further update/explanation to support delivery at the site 350 units are indicated to be deliverable in the next 5 years/ years 0-5 of the Plan.

418 | Unity/DN7 Initiative | 1015 | The site has outline planning permission for 3,100 homes and 20/01197/REMM – details of appearance, landscaping, layout and scale for a estate road from Hatfield Links Road into Unity Connect, Awaiting Decision. Discharge of Conditions in relation to drainage submitted on 4th May 2020. The site is in significant multiple ownership and we understand that CPO procedures will be employed to facilitate the delivery of requisite infrastructure. Homes England is also assigning public funding to support the development. Given the presence of multiple landowners, the need for considerable public funding, the likelihood of a protracted timeframe to open up the site for development and the absence of confirmed market interest, the site is unlikely to deliver the Council’s prediction of 1015 homes in the plan period. The Council anticipates delivery of 175 dwellings in years 0-5 of the Plan SDEB 26 confirms that there was no delivery in 2018/19. SDBE27 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.
2.19. Firsure Ltd 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. Firsure Ltd 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. Firsure Ltd consider that this supports a higher non-implementation rate for small sites, and within the defined villages. Firsure Ltd consider a non-implementation rate of 20% should be introduced, although this is considered conservative.

Part C

2.21. Firsure Ltd 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 Firsure Ltd consider it would be appropriate to allow for non-implementation of allocations without permission. Firsure Ltd 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>Description</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>
<tr>
<td>Expected completions on completions not in allocated sites (small sites and in defined villages)</td>
<td>585</td>
<td>468</td>
<td>Allows for a 20% non-implementation rate, in line with the evidence on lapsed/stalled sites.</td>
</tr>
<tr>
<td>Expected completions on allocations without planning permission</td>
<td>6,630</td>
<td>6,502 / 5,967</td>
<td>Based on a discount of 128 dwellings / 10% non-implementation</td>
</tr>
<tr>
<td>Total 2015 to 2035</td>
<td>19904</td>
<td>18,421 / 18,006</td>
<td>Range dependent on discount on completions on allocations without planning permission.</td>
</tr>
</tbody>
</table>
Q5.3. Should Table 5 of the Plan be modified to include the following, having regard to policies 2, 3 and 11 relating to development on unallocated sites and policy 7 relating to Doncaster Sheffield Airport:

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

b) 290 windfalls at Defined Villages?

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

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

Part A

2.24. In PQ26 the Council consider that they would anticipate a supply from windfall housing of around 200 dpa. The Council have then calculated the total expected from 1st April 2018 to 31st March 2035 to be 3,400 dwellings. We consider that this figure, if applied in full, would lead to some double counting initially, as ‘known’ windfalls will already be included within the supply and anticipated to contribute towards delivery during the Plan Period. Firsure Ltd 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. Firsure Ltd 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
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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. **Firsure Ltd 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. Firsure Ltd 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. Firsure Ltd consider that including 290 dwellings on top of the proposed windfall allowance of 200 dpa would constitute double counting. Firsure Ltd 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. Firsure Ltd 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. Firsure Ltd do not consider that it is appropriate to include a figure for 197 dwellings arising from sites on the Brownfield register which have not been identified as allocations. It is considered that delivery on brownfield sites would have informed the evidence to support an appropriate overall windfall allowance. To include an additional allowance is likely to lead to double counting. This is acknowledged by the Council in their response to PQ27.

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

**Part D**

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

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

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

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

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

Q5.4. To be effective, should Table 5 of the Plan and/or other parts of the reasoned justification for policy 6 be modified to set out explicitly what the total housing supply is for the Plan period 2015 to 2035?

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

<table>
<thead>
<tr>
<th>Reference</th>
<th>5 year capacity</th>
<th>Spawforths</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Council View</td>
<td></td>
<td></td>
</tr>
<tr>
<td>15/01278/OUTM</td>
<td>280</td>
<td>210</td>
<td>Optimistic delivery rates: Discharge of conditions sought at the end of November 2019/Pending decision at July 2020.</td>
</tr>
<tr>
<td>12/00188/OUTM</td>
<td>280</td>
<td>210</td>
<td>A reserved matters has been submitted 20/01421/REMM. Decision Pending</td>
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<tr>
<td>14/00484/OUT</td>
<td>5</td>
<td>0</td>
<td>Permission has expired</td>
</tr>
<tr>
<td>08/01077/OUTA</td>
<td>140</td>
<td>0</td>
<td>History of planning, lack of developer interest in this site. Firsure Ltd do not consider this site should be relied on for a source of supply within the Plan.</td>
</tr>
</tbody>
</table>
Hearing Statement: Matter 5– Doncaster Local Plan, Firsure Ltd, August 2020

Sub Total  
<table>
<thead>
<tr>
<th>705</th>
<th>420</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total to be discounted</td>
<td>285</td>
</tr>
</tbody>
</table>

2.46. In relation to sites with planning permissions in principle, Firsure Ltd 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. Firsure Ltd 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. Firsure Ltd would expect a minimum of 12-18 months from planning permission to start on site, and a further 6 months until the first completion. Firsure Ltd 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. Firsure Ltd 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. Firsure Ltd have reviewed the housing supply and trajectory and have identified a significant number of permissions that will not come forward as anticipated. Firsure Ltd consider that the supply excluding windfalls will be a maximum of 18,541 / 18,006 dwellings (dependent on non-implementation discount).

2.52. Firsure Ltd 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, Firsure Ltd have summarised their view of five year supply in the table below.

<table>
<thead>
<tr>
<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><strong>A</strong> Sites of fewer than 10 dwellings with permission</td>
<td>786</td>
<td>707</td>
</tr>
<tr>
<td><strong>B</strong> Sites of 10 or more with detailed planning permission</td>
<td>3,449</td>
<td>3,104</td>
</tr>
</tbody>
</table>
### Table

<table>
<thead>
<tr>
<th></th>
<th>C) Sites of 10 or more dwellings with outline planning permission</th>
<th>D) Sites with a grant of planning permission in principle</th>
<th>E) Allocations without planning permission</th>
<th>F) Windfall Allowance</th>
<th>G) Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1,314</td>
<td>1,183</td>
<td>1,029 (-285)</td>
<td>1,000</td>
<td>8,229</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1,405</td>
<td>7,518</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1,405 (156) (10% non implementation)</td>
<td>6,694</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1,000</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>400 (-600)</td>
<td></td>
</tr>
</tbody>
</table>

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

**Site 302 and 305, The Stripe, Rossington**

2.55. Firsure Ltd suggests that Site 302 and 305 at The Stripe, Rossington should be allocated and should be identified as a housing site.

2.56. The site at The Stripe, Rossington is located on the edge of an established residential area and benefits from easy access to the full range of services and facilities located within Rossington. The site is therefore in a sustainable and appropriate location for housing growth. Additional housing should be located in Rossington, recognising its strategic location and economic growth potential.
2.57. The Stripe, Rossington site should therefore be allocated to deliver housing in the short term. A robust Green Belt boundary can be created utilising Stripe Road, Common Lane and the East Coast Main Line which is clear and well defined and would be a rounding off of Rossington. This is a distinctive and long term urban boundary.

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

2.59. The deliverability and benefits of the Stripe Road, Rossington site are contained in the attached Advocacy Report.

Proposed Change

2.60. To overcome the objection and address soundness matters, the following changes are proposed:

- Review the allocations resultant from the site selection process as set out in response to Q5.1 and make appropriate allocations in order to meet the required supply
- Allocate additional sites to make up for the shortfall in supply in supply, against minimum requirement 1,100. NB there is a shortfall in supply when considered against the requirement of 920 d.pa over an extended plan period.
- Allocate site 302 and 305, The Stripe, Rossington
Appendix 1: The Stripe, Rossington (Site 302 and 305), Advocacy Report
Rossington

STRIPE ROAD, ROSSINGTON
Introduction

The land at Stripe Road, Rossington presents a sustainable development opportunity to provide new housing for Doncaster. The site is being promoted by Firsure Ltd as a development opportunity that can deliver circa 500 dwellings.

Background
This advocacy document has been produced for the site at Stripe Road, Rossington.

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

The site is located to the south of Rossington in a triangle of land between existing housing areas and adjacent to the East Coast Mainline in an area currently designated as Green Belt. It is circa 18.5 Ha in area. The site is in an area on the southern edge of Rossington.

Stripe Road is within 10 mins walk (800m) of the Gattison Lane Local Centres with good access to major bus routes.

The site is a protrusion of Green Belt within an existing residential area of Rossington.

Rossington All Saints Academy is within 300m of the site providing secondary school education and Torsedale Infant School and St Joseph’s Catholic Primary School are within 700m offering primary education.

The site is located 1 mile from the Great Yorkshire Way which provides access to the M18 (Junction 3) within approximately 10 minutes drive (3.8 miles).

The site is adjacent to existing housing to the north, east and west with the East Coast Mainline separating the site from residential development to the east.

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

Objectives
The key objectives of the scheme are to:

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

Scope
The scope of this document is to set out the credentials for land at Stripe road, Rossington as a residential development opportunity and to seek its allocation as a housing site through the Local Plan Review. This is set in the context of the opportunity that the site provides to contribute towards delivering new housing for Doncaster and the economic growth aspirations for the wider Borough.
Planning and Regeneration Need

The land at Stripe Road, Rossington 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 Rossington that has begun with the reclamation of the former mining site to the west of the town.

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

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.

The role of Rossington should be the focus for growth and regeneration, given its strategic location next to the M18 with new infrastructure in the form of the Great Yorkshire Way, provision of major employment opportunities at i-Port and the airport, which are adjacent to the settlement. Furthermore, the proposed new PGA golf course is adjacent to Rossington. With major expansion plans at Doncaster Airport ‘Aetropolis’, Rossington is in a prime strategic location to benefit from such plans and associated housing should be provided to ensure Doncaster benefits from such inward investment. Firsure proposes that their site at Stripe Road can accommodate new housing to meet that need.

The Stripe Road site in Rossington therefore 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 District Centre. The site is in a sustainable location, encompassed on three sides by 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.
Green Belt

The housing needs of Doncaster will require Doncaster Metropolitan District Council to review the Green Belt Boundaries within the district. The land at Stripe Road, Rossington is an opportunity to positively adjust the Green Belt boundary and form a new robust and long lasting boundary.

In the Borough of Doncaster approximately 46% of the area is designated as Green Belt. This is the western part of the Borough which forms part of the South Yorkshire Green Belt surrounding urban areas. Despite Green Belt Review as part of the current Local Plan, Green Belt will continue to place a significant pressure and obstacle to housing delivery in the emerging plan. Paragraph 83 of the Framework considers that Green Belt boundaries can change “in exceptional circumstances”. Such a circumstance exists through the significant need to provide housing in Doncaster. To meet the housing need and economic growth aspirations DMBC will need to revise the Green Belt boundaries for the emerging Local Plan and beyond to provide the new boundaries with some permanence.

The Framework establishes five purposes for including land within the Green Belt. Reviewing the site at Stripe Road against the purposes of Green Belt it can be demonstrated that the allocation of the site for housing will not undermine the integrity of the Green Belt:

1. **To check unrestricted sprawl**
   The allocation of the site will create a new robust Green Belt boundary utilising the East Coast Mainline on the eastern edge and a tree belt to the southern edge.

2. **To prevent neighbouring towns from merging**
   To the east of the East Coast Mainline there are proposals for a European Tour Golf Course on land not designated as Green Belt. The planning application is awaiting determination. The closest settlement to the south of Rossington is Bawtry which is over 2km away. The allocation of the site for housing will therefore not merge neighbouring towns.

3. **To assist in safeguarding the countryside from encroachment**
   An isolated area of the countryside will be encroached into with the allocation of the site however the nature of the site and its separation from wider countryside to the south will prevent further encroachment beyond this area.

4. **To preserve the setting of historic towns**
   Rossington is are not considered to be a historic town and therefore the Green Belt in this area does not protect a setting of a Historic Town.

5. **To assist in urban regeneration**
   Whilst areas of the Doncaster Borough and Rossington do require urban regeneration there will be a need for additional housing sites beyond the regeneration sites requiring Green Belt release.

   The impact on the openness of the Green Belt will also be limited. The site is bounded by the urban area to the north, and partially to the east and west. To the south is an established track from Stripe Road to a level crossing with a tree belt to the south of it. This track and tree belt form a robust new urban boundary. The tree belt will prevent views between the remainder of the Green Belt and the site.

   It can therefore be demonstrated that the site will not undermine the integrity of the Green Belt to the south of Rossington.
Settlement Analysis

The Stripe Road site is located to the south of Rossington in a triangle of land between the existing urban area and the East Coast Mainline. The site is within walking distance of local facilities on Garrison Lane (under 800m). There are also numerous bus services which pass adjacent or close to the site connecting the area with Doncaster Town Centre, the centre of Rossington and Tickhill.

The proposed site is located on the southern edge of Rossington adjacent to the urban area and close to a number of existing facilities.

Rossington provides a number of services and facilities including convenience and retail shopping as well as medical facilities, library and schools. There are also regular buses to Doncaster and Tickhill.

St Joseph’s Catholic Primary School and Tornedale Infant School are within 10 minutes walk of the site and Rossington All Saints Academy provides secondary education within 5 minutes walk.

The bus services 55 and 56 travels along Clay Flat Lane and Stripe Road providing up to four times hourly buses into Doncaster in each direction. With journey times of approximately half an hour this services connects the site well with Doncaster Town Centre and the facilities and services provided there.

Furthermore there are numerous other buses which travel close to the site on Clay Flat Lane and Bond Street which provide irregular services to Tickhill and Harworth.

The excellent bus services within the area create opportunity for employment within urban Doncaster accessed by public transport.
Site Photographs

1. Stripe Road looking north to the bridge over the East Coast Mainline.

2. View from the north of the site looking south down Stripe Road.

3. View from the Bond Street/Stripe Road junction looking east across the site and the East Coast Mainline railway.

4. View looking north from the site adjacent to the railway footbridge.

5. View from the footbridge over the railway looking south.

6. View from railway footbridge looking east over neighbouring countryside.

7. View from Hall View Road/Stripe Road junction looking south.
Site Photographs

View from the track adjacent to the railway line on the eastern boundary of the site, looking south-west towards Stripe Road.

View from the track on the southern boundary of the site looking north across the site. The East Coast Mainline is visible on the right.

Fly-tipping on the track to the level crossing on the southern boundary of the site.

View north along Stripe Road with the site on the right.

A panoramic view looking west from Stripe Road at the south-western corner of the site.
Wildlife corridors

The railway line on the Site's eastern boundary provides a minor wildlife corridor; though where adjacent to the Site it is poorly vegetated, limiting its function as a corridor. The railway line links areas of woodland to the north and south of Rossington but interaction with the site is minimal due to the uniform nature of the arable habitat.

Figure 2 Analysis of wildlife corridors and higher value habitat in relation to the Site.

Water bodies

There are no standing water bodies on Site or within 500m of its boundaries.

Analysis of potential Wildlife Corridors and Higher Value Habitat
Brooks Ecological consultants were commissioned to carry out an ecological appraisal at land at Stripe Road, Rossington in September 2018. The site is entirely occupied by arable land and associated margins, these habitats are species poor and of limited ecological value. Their presence should not pose any constraint on development. It is concluded that development of the site is highly unlikely to impact on any protected or notable species, or designated site’s.

The site is entirely occupied by arable land and its associated margins. While retaining all existing trees is desirable and should always be the first option, the value of any specimens removed in this case can easily be replaced and exceeded through the planting of new native specimens elsewhere on site. Habitats on site should pose no constraint to development.

It is concluded that development of this site is highly unlikely to impact on any protected or notable species, or designated sites. Further survey work is not considered necessary in support of this conclusion.

**Wildlife Corridors**

The railway line on the site’s eastern boundary provides a minor wildlife corridor; though where adjacent to the site it is poorly vegetated, limiting its function as a corridor. The railway line links areas of woodland to the north and south of Rossington but interaction with the site is minimal due to the uniform nature of the arable habitat.

**Designated Sites**

The site lies within the 3km IRZ for Potteric Carr SSSI and 5km IRZ for River Idle Washlands SSSI. The Local Planning Authority may consult Natural England on any potential impacts on these sites, however the separation between the proposed development site and these two SSSI’s suggest they would not be negatively affected by residential development at this site.

**Local Wildlife Sites (LWS)**

Nine and Sixteen Acre Plantation LWS (site 2.56 a&b) is found a short distance from the site but to the east of the railway line. In turn this links White Mires Wood LWS and Bawtry Forest LWS further south along the railway line. Despite the proximity of these sites, the railway line will prevent any increase in direct access which could have arisen from any new development at this site.

**Early Design Considerations**

The NPPF makes it imperative that sites are designed according to the ‘mitigation hierarchy’: Avoid - Mitigate - Compensate. Avoidance is the key first stage and designs must show that they have avoided important receptors if possible. Mitigation, and as a last resort, Compensation will only be appropriate where there are clearly no alternatives and a strong planning argument will be needed in these cases.

At this stage in the project a proposed site layout has not been finalised. Based on the surrounding habitat the provision of a strip of native tree and hedge planting along the length of the eastern boundary would support the existing railway corridor, providing a meaningful enhancement through the provision of new native planting and by bolstering this potential wildlife corridor.
Historical Mapping

1893 OS Map

1982 OS Map

2006 OS Map

1931 OS Map

The historical maps shown were reproduced from maps predominantly held includes county, unitary authority, district, civil parish and constituency. Boundary information depiction includes relevant road number and classification. Road names are also included together with the historical maps were produced from the Ordnance Survey`s 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940`s, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The historical maps shown were produced from the Ordnance Survey`s 1:10,000 colour raster mapping. These maps are derived from Landplan Source map scale - 1:10,000.
Curtins has prepared a Phase 1 Desk Study Ground Invetigation which explores the historic land use and highlights potential risk associated with these uses. The Desk Study did not identify any geoenvironmental constraints which would prevent the development of the site.

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
<th>Potential Sources of Contamination</th>
</tr>
</thead>
<tbody>
<tr>
<td>1850s to 1930s</td>
<td>From the earliest available mapping (1850s) the site is predominately</td>
<td>Localised deposition of Made Ground in the form of sub-base to form Middle Lane.</td>
</tr>
<tr>
<td></td>
<td>within its current configuration and with the small track (noted as Middle</td>
<td>Potential leakage/spillages of fuels/hydrocarbons associated with adjacent railway line.</td>
</tr>
<tr>
<td></td>
<td>Lane) running east to west within the northern portion. A small plantation</td>
<td>Localised minor inclusions of Made Ground associated with minimal development of the surrounding area.</td>
</tr>
<tr>
<td></td>
<td>is present in the south-western corner of the site.</td>
<td>Uncontrolled deposition of Made Ground within former gravel pits serving as a potential ground gas source.</td>
</tr>
<tr>
<td></td>
<td>The surrounding land, similarly to the site, was dominated by agricultural</td>
<td></td>
</tr>
<tr>
<td></td>
<td>farm land, plantations and farm buildings until the early/mid 1930s. The</td>
<td></td>
</tr>
<tr>
<td></td>
<td>salient feature in the area is railway line that forms the eastern border</td>
<td></td>
</tr>
<tr>
<td></td>
<td>of the site and was present from earliest available mapping. By the end</td>
<td></td>
</tr>
<tr>
<td></td>
<td>of the 1930s, residential developments had started to be constructed to the</td>
<td></td>
</tr>
<tr>
<td></td>
<td>north west of the site.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>A number of gravel pits are present 500m west of the development site and</td>
<td></td>
</tr>
<tr>
<td></td>
<td>listed as mineral sites. In later mapping, these pits have been infilled.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
<th>Potential Sources of Contamination</th>
</tr>
</thead>
<tbody>
<tr>
<td>1930s to present day</td>
<td>By the 1960s the plantation is no longer present, with</td>
<td>Potential leakage/spillages of fuels/hydrocarbons associated with adjacent railway line.</td>
</tr>
<tr>
<td></td>
<td>this area, likely cleared to form the off-site R.O.C Monitoring Post in the</td>
<td></td>
</tr>
<tr>
<td></td>
<td>south-western corner.</td>
<td>Localised minor inclusions of Made Ground associated with minimal development of the surrounding area.</td>
</tr>
<tr>
<td></td>
<td>From the 1930s onwards, the area to the west, south and east of the site</td>
<td>Uncontrolled deposition of Made Ground within former gravel pits serving as a potential ground gas source.</td>
</tr>
<tr>
<td></td>
<td>remain undeveloped and used for agricultural purposes. An Royal Observer</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Corps Monitoring post is located immediately off site to the south west.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>This is anticipated to have been decommissioned by 1991 at the latest.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Extensive residential development has continued to take place to the north</td>
<td></td>
</tr>
<tr>
<td></td>
<td>west, north and north east of the site.</td>
<td></td>
</tr>
</tbody>
</table>
Existing Bus Stops on Clay Flat Lane to potentially be upgraded

Existing Bus Stops on Stripe Road to be for school bus services only

Potential for new bus stops in this area

Indicative site access measuring at around 6.0m carriageway with 2.0m footway tying into the existing. Localised widening at the junction bellmouth

Indicative access location to the site
Highways and Access

The Highways Strategy prepared by Curtins considers how the site is to be accessed and identified a primary point of access to the site but also that numerous other locations along the length of Stripe Road would also be suitable. Furthermore the site is well located for sustainable transport connections.

Bus Accessibility
Guidance from the Chartered Institution of Highways and Transportation (CIHT) document ‘Guidelines for Planning for Public Transport in Development’ indicates that ideally, a bus stop should be located within 400m from a new development. There are multiple bus stops within 400m of the site.

Two bus stops are located on Stripe Road, just south of Clay Flat Lane. Both these bus stops have just a flag and a pole. A further northbound bus stop located south of Common Lane.

Two bus stops are located on Clay Flat Lane, with the eastbound and westbound bus stop having a flag, clearway markings, shelter with bench, timetable information, raised kerbs and tactile paving.

A further two bus stops are located on Bond Street, to the west of the site. These two bus stops have a shelter with bench, flag pole and timetable information.

The existing buses routes, close to the development site, currently travel on Stripe Road, but loop around the New Rossington residential area via Bond Street and Clay Flat Lane.

Cycle Infrastructure and Accessibility
There are no cycle facilities on the roads in the close vicinity of the site as shown in Figure 6, but the flat topography makes cycling an attractive mode of travel for potential residents of the development site, with residents potentially cycling to Doncaster or Rotherham.

It was observed during the site visit that the wide existing footways, in the immediate vicinity of the development site, were in good condition and could potentially be used by cyclists to travel further afield.

Rail
The site is 9.6km from Doncaster Station, located within Doncaster town centre, which equates to a 40 – 45min bus journey.

Conclusion
The development can be accessed from the 30mph or 40mph section of Stripe Road and would have no significant adverse impact on the local highway network. The site access is acceptable in geometric terms and will allow the safe passage of all road users into the site including cyclists and pedestrians.

The key conclusions found are:
• The site is in a sustainable location;
• The long straight frontage allows many different potential access junction locations;
• Public Right of Ways pass through the site;

Therefore, the site has been shown to be in a sustainable location, with existing bus stops in close proximity of the development site. Furthermore, Doncaster and central Rossington can be accessed via sustainable modes of transport.
Flood Risk and Drainage

A preliminary Drainage Appraisal and Flood Risk Assessment was undertaken by Walker Ingram Associates in Sept 2018. The Environment Agency identifies the site as being in Flood Zone 1 with a low risk of flooding for rivers or the sea. The site is also identified as having a low or very low probability of surface water flooding.

**Flood Risk**
- The site is not located near enough to a River to cause a problem of flooding from this source and this is also evident on the Environment Agency flood map.
- Although no watercourses are recorded within the immediate vicinity of the site, the chance of flooding from this source has been considered and concluded that the flood risk is low. The topography of the site and surrounding area is in a north easterly direction with the railway cutting preventing any surface water from entering the proposed development. The topography of land to the south and west also breaks its back just beyond the boundary, with land falling away from the proposed development.
- Flooding from Land (Surface Water) - The Environment Agency surface water flood maps shows the majority of the proposed development to be within a very low risk area, with no potential surface water flood routes affecting the site. It was concluded that the medium to high risk areas are low points within the site that would be affected from runoff from the site only. However, it was noted during the site walkover that although a highway drainage system was present within Stripe Road, this was limited adjacent to the southern third of the site, with only a single gully on either side of the highway taken a substantial length of carriageway. Furthermore, no kerbs were present, and although the grassed verge appeared to be higher than the carriageway itself, directing the water along the carriageway edge and into the gullies, there is the potential risk for surface water runoff to enter the proposed development. Therefore, flooding from this source will need to be considered as part of the proposed development.
- Flooding from Groundwater - Although the geology may allow the emergence of groundwater, due to the topography of the site and surrounding area, flooding from this source is considered to be low risk.

**Drainage**
In order to comply with the requirements of NPPF, it will be necessary to consider aspects of Sustainable Drainage techniques for the new development. The Geological Survey Maps of Great Britain indicates that the site is underlain by the Chester Formation-Sandstone, Pebble (gravelly), which contains particles ranging in size from coarse to fine grained. Considering the geology beneath the site, it is anticipated that the site may be suitable for the disposal of surface water using infiltration techniques. However, due to the railway cutting adjacent to the site, the potential impact of infiltrating water re-emerging within the cutting will need to be investigated and could potentially prevent the use of infiltration techniques. It is a requirement to ensure that surface water run-off from any proposed development has negligible consequence on downstream areas either in sewer capacity or discharge to watercourse.

Consideration of the proposed drainage should firstly be given to infiltration techniques (to ground).
Site Issues & Opportunities Plan

KEY
- Opportunity for Vehicular Access
- Public Right Of Way
- Views into Countryside
- Opportunity for connection to Public Right of Way
- Noise Source
- Existing Bus Stops
- Low Point within site

FUTURE INTERNATIONAL GOLF COURSE

Views possible

Nursery and Pre-school
Rossington All Saints Academy
Clay Flat Lane
Rossington All Saints Academy Mast
Stone Hills
Hunister Lodge
Skelton Cumbria
Gravel Hill Plantation
Path

Bond Street
Clay Flat Lane
Bridge Meadow
Rooks Nest Road
Stiffne Road
Track
Common Lane
21m
22m
26m
15m
11m

Site Issues & Opportunities Plan
The Site at Stripe Road provides a number of opportunities which any proposed development can utilise in order to create a unique place and to continue the regeneration of Rossington.

**The Site**
The total site is a triangle of land of approximately 18.54ha located to the south of Rossington.

**Topography**
The site slopes gently from the high point in the south-western corner to the low point in the northern corner.

**Access**
The site is encompassed by public rights of way as well as a route passing through the site along the route of middle lane, leading to the bridge over the East Coast Mainline Railway.

**Ecology**
The site has little ecological value due to the nature of its current agricultural use.

**Transport**
The site is well served by existing bus services with regular services on Bond Street and Clay Flat Lane providing connections to central Rossington and Doncaster.

**Noise**
The adjacent East Coast Mainline is likely to be a cause of noise which may affect the proposed properties. A buffer separating the new properties from the railway is likely to be required.
Development Principles

The approach of the masterplan is to provide housing which integrates with the surrounding area making the most of the surrounding landscape and the pedestrian links. The a buffer will be provided alongside the railway separating the development from the noise of the passing trains whilst also improving the opportunity for this area to act as a wildlife corridor. Pedestrian routes through the site will be reinforced to integrate the proposal into Rossington.

A number of principle 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 from two points on Stripe Road with internal loop roads within the proposed development.

Drainage
It is proposed that the Sustainable Urban Drainage solution be provided to allow infiltration into the ground.

Trees and Public Open Space
The main public open space (POS) within the development lies on the eastern edge of the site separating the new homes from the existing railway and avoiding development within a dip within the site. This POS will be connected to the existing homes by a green route from Stripe Road.

Trees will be used within the scheme to identify key pedestrian routes.

Ecology
The illustrative masterplan has sought to support the integration of wildlife within the site, particularly in the landscape buffer on the eastern edge.

Access
The masterplan allows for the existing pedestrian linkages through the site to be maintained. Further routes will also be provided to fully connect the proposal with the existing neighbourhood and encourage sustainable movement in the local area.

Phasing
It is possible for the delivery of the site to be phased to deliver some of the new homes within the short term and some within the medium term. This will allow the site to continue to deliver over an extended period.

Residential Design
Creation of a high quality residential extension to Rossington 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
Annotated Illustrative Masterplan

- **FEATURE**
- **OPEN SPACE**
- **FOCAL SPACE**
- **FOOTPATH**
- **GREEN ROUTE**
- **FRONTAGE ONTO STRIPED ROAD**
- **TREE BELT RETAINED**
- **ACCESS TO LEVEL CROSSING MAINTAINED**

Locations and Points of Interest:
- **Bond Street**
- **Clay Flat Lane**
- **Striped Road**
- **East Coast Mainline**
- **Saints Academy Nursery and Pre-school**
- **Rossington All Saints Academy**
- **Sports Centre**
- **Stone Hills**
- **Hunster Lodge**
- **Hunster Grange**
- **Gravel Hill Plantation**
The land at Stripe Road, Rossington provides a residential development opportunity in a sustainable location close to shops, services and community facilities to meet the needs of the District and support the continued regeneration of Rossington. The site is currently located within the Green Belt and is available, suitable and achievable in accordance with the Framework.

**Availability**
The land is being promoted by Firsure Ltd as landowner. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG).

**Suitability**
The proposed site utilises a distinct element of the existing Green Belt within the urban area. To the east of the East Coast Mainline railway line is countryside, not designated as Green Belt and where proposals for an international golf course are planned. The development of the site will be an efficient use of land to provide quality development and new homes for Rossington.

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

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

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

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

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

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

**Summary**
The site at Stripe Road provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance.
**Conclusion**

The site at Stripe Road, Rossington is available, suitable and achievable and therefore deliverable in accordance with the Framework. The site represents a sustainable residential opportunity on the edge of an established residential area and provides an opportunity to the continued regeneration of Rossington and continue the growth of the wider Borough.

There is a need for Doncaster Council to review their Green Belt boundaries to meet the housing need and demand in the area. Within this context Rossington is a sustainable location and should accommodate additional housing growth to reflect its status in the Borough and proximity to employment opportunities.

This Advocacy Report confirms there are exceptional circumstances supporting the release of the site from the Green Belt due to the urgent need to meet Doncaster’s housing need and ambitions for growth.

Firsure Ltd 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 also shown that there are no known constraints, that could not be suitably mitigated, that would prevent this site coming forward within the plan period.

As such, the development of the site, as shown within the indicative masterplan, is considered achievable and will support the economic growth which has already begun in Rossington as well as the wider vision for the settlement and surroundings.

The indicative masterplan shows how a mix of housing can be accommodated within the site, alongside connectivity, landscaping and drainage features. The scheme is being promoted by the landowner and will go towards meeting the housing requirement and need in the area.

The highway work has included initial modelling to confirm the suitability of the site access and highway network to accommodate the proposed development.

The site is not in an area at risk of flooding. The drainage work has identified a drainage strategy for the site. It has confirmed the attenuation required on site and demonstrated the suitability of the area identified on the masterplan.

Ecological survey work has confirmed there are no ecological constraints to the development of the site and recommended how habitats can be enhanced and created.

Ground investigation has confirmed the suitability of the site to accommodate future development and the type of foundations that would be required.

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

It has therefore been shown that the site is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is also attractive to the market and is deliverable within the plan period.
Key Benefits

- Optimum location to assist in the continued growth and regeneration of Rossington
- The delivery of circa 500 new homes in a range of house types, sizes and tenure
- Circa 1,750 new jobs (direct and indirect) from the construction of the residential scheme alone
- Gross Value Added of around £75 million
- Circa £12 million Annual Household Expenditure
- At least £2.5 million of first occupation expenditure
### Appendix 2: Sites with Planning Permission at April 2018

<table>
<thead>
<tr>
<th>Site Reference</th>
<th>Capacity</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>544</td>
<td>55</td>
<td>Development has stalled, there are significant constraints.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Discount from Supply</strong></td>
</tr>
<tr>
<td>792</td>
<td>9</td>
<td>Stalled site, not considered likely to come forward.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><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.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><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>Reference</td>
<td>Number</td>
<td>Description</td>
</tr>
<tr>
<td>-----------</td>
<td>--------</td>
<td>-------------</td>
</tr>
<tr>
<td>960</td>
<td>13</td>
<td>No sign of start, permission has lapsed. <strong>Discount from supply</strong></td>
</tr>
<tr>
<td>856</td>
<td>6</td>
<td>Site appears to have stalled. Should not be relied upon to contribute towards supply. <strong>Discount from Supply</strong></td>
</tr>
<tr>
<td>951</td>
<td>28</td>
<td>No start recorded, permission expired in 18/19. <strong>Discount from supply.</strong></td>
</tr>
<tr>
<td>958</td>
<td>79</td>
<td>Outline consent in 2015, no delivery on site in 18/19. <strong>Discount from supply.</strong></td>
</tr>
<tr>
<td>569</td>
<td>220</td>
<td>Long standing and unimplemented permission that has been available and remains undeveloped. Lack of developer interest. The site should not be relied upon to contribute towards the supply. <strong>Discount from supply.</strong></td>
</tr>
<tr>
<td>628</td>
<td>7</td>
<td>A start was recorded in 2013/14, no delivery has been recorded on site. The site has stalled. <strong>Discount from supply.</strong></td>
</tr>
<tr>
<td>955</td>
<td>16 (10)</td>
<td>The capacity of this site should be reduced from 16 to 6 to reflect application 19/02787/FUL). <strong>Discount 10 units from the supply.</strong></td>
</tr>
<tr>
<td>956</td>
<td>16</td>
<td>No evidence that the site can be delivered. The council have discounted this site within their latest five year supply assessment. This should not be relied on to contribute to the supply within the Plan. <strong>Discount from the supply.</strong></td>
</tr>
<tr>
<td>1076</td>
<td>7</td>
<td>No start, recorded permission expires in September. Should not be relied upon to contribute towards the supply. <strong>Discount from the supply.</strong></td>
</tr>
</tbody>
</table>