Hearing Statement – Matter 5

**Doncaster Local Plan**

On behalf of Priority Space

August 2020
1. **Introduction**

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

    Matter 5: Housing Supply

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

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

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

2.2. Priority Space 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. Priority Space 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. Priority Space are concerned that the SA and SA Addendum do not seem to have consistently informed the Plan, and SDEB 46 is not sufficiently clear to provide clarity for the role of the SA in the site selection process.
2.5. Priority Space have significant concerns that the site selection process and identification of Reserve Sites have been informed by an inadequate evidence base, with particular regards to Flood Risk. Priority Space set out in Matter 1 that there is an urgent need for a Level 2 SFRA to inform the Plan and site selection process.

2.6. In Carcroft the Sustainability Appraisal indicates that site 165/186 performs well in terms of access to bus services and the cycle network. Priority Space note that it is relatively distant from the train station and employment opportunities. Site 273 however performs better than the allocated site in terms of access to services, access to primary and secondary school and GP services, and performs as well as the allocated site in terms of access to the bus network and cycle network. It is well located in relation to existing employment provision in Carcroft. Priority Space consider that the allocation of site 273 instead of or in addition site 165/186 (with a reduced capacity) will support the regeneration of Carcroft as well as promoting sustainable patterns of development. The allocation of additional land in Carcroft should be informed by a Level 2 SFRA. In the absence of this a site specific SFRA including a Sequential Assessment has been prepared and carried out for site 273, as summarised in Priority Space original representations, which demonstrates that the development of 273 will not result in flood risk to existing property. Furthermore Priority Space have engaged with the Environment Agency in relation to Flood Risk and the preparation of the Flood Risk Assessment. The Environment Agency have confirmed that they do no object to the allocation of site 273.

2.7. Priority Space 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. Priority Space considers there is an urgent need for a Level 2 SFRA to inform the Plan and site selection process.

2.8. 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.

2.9. 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’. Priority Space 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. Priority Space have identified a number of circumstances where other ‘omission sites’ perform better than the identified ‘Reserve Sites’.

2.10. In the Doncaster MUA three Reserve Sites are identified; Site 399, 495 and 497 – all are affected by flood risk. There are sites available in the MUA, which have developer interest, perform better within the Sustainability Appraisal, and pass the first sift of the flood risk sequential test including Site 494 and Site 234. In Carcroft Site 273 has developer interest and performs well in the SA with particular regard to accessibility.

2.11. Priority Space 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]

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

2.13. 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?

2.14. As explained in Matter 2, Priority Space 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

2.15. 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. Priority Space 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.

2.16. Priority Space 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 Priority Space 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).

2.17. 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 | Priority Space 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 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.
2.18. Priority Space 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

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

Part C

2.20. Priority Space 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.

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

2.22. It is noted that the supply attributed to completions appears to be resultant from gross completions rather than net completions. The Plan indicates that completions between 2015 and 2018 equate to 3,400 homes. However, data in the Residential Land Availability Report indicates that net completions amount to 3,211 dwellings which would serve to increase the residual requirement based on an OAN of 920 dwellings to at least 15,189 dwellings, and reduce the flexibility in the Plan to 866 dwellings (4.7%), which is insufficient for a Borough seeking growth.
<table>
<thead>
<tr>
<th></th>
<th>Council Figures</th>
<th>Spawforths</th>
<th>Comments/justification</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Net Completions 2015-2018</strong></td>
<td>3,400</td>
<td>3,211</td>
<td>Spawforths have used the completions set out in the RLA, based on the ‘net completions RLA methodology’ figures is 3,211 dwellings. The Council have used the figure for net additions to Council tax stock, and not based on the RLA methodology which identifies whether there are other reasons for the new Council tax data. In using this wider data for completions there is an increased likelihood the level of completions has been over inflated in the supply.</td>
</tr>
<tr>
<td><strong>Expected completions with planning permission at 2018</strong></td>
<td>9,289</td>
<td>8,360</td>
<td>Allows for 10% non-implementation rate, in line with evidence on lapsed/stalled sites.</td>
</tr>
<tr>
<td><strong>Expected completions on completions not in allocated sites (small sites and in defined villages)</strong></td>
<td>585</td>
<td>468</td>
<td>Allows for a 20% non-implementation rate, in line with the evidence on lapsed/stalled sites.</td>
</tr>
<tr>
<td><strong>Expected completions on allocations without planning permission</strong></td>
<td>6,630</td>
<td>6,502 / 5,967</td>
<td>Based on a discount of 128 dwellings / 10% non-implementation</td>
</tr>
<tr>
<td><strong>Total 2015 to 2035</strong></td>
<td>19904</td>
<td>18,421 / 18,006</td>
<td>Range dependent on discount on completions on allocations without planning permission.</td>
</tr>
</tbody>
</table>
Q5.3. Should Table 5 of the Plan be modified to include the following, having regard to policies 2, 3 and 11 relating to development on unallocated sites and policy 7 relating to Doncaster Sheffield Airport:

a) a windfall allowance of 3,400 new homes, or some other figure?
b) 290 windfalls at Defined Villages?
c) 197 new homes on windfalls on sites identified in the brownfield register 2019?
d) New homes at Doncaster Sheffield Airport? Should any such housing completions count towards achieving the aim of delivering 18,400 new homes in the Plan period?

Part A

2.23. 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. Priority Space 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. Priority Space 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.

2.24. 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.

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

2.26. Priority Space 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

2.27. Priority Space 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.

2.28. Priority Space consider that including 290 dwellings on top of the proposed windfall allowance of 200 dpa would constitute double counting. Priority Space 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.

2.29. Priority Space 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

2.30. Priority Space 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

2.31. 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.

2.32. 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.

2.33. 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.

2.34. 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).

2.35. Priority Space 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?

2.36. Priority Space 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?

2.37. Priority Space 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?

2.38. As explained in Matter 2 and Matter 3, Priority Space 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.

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

2.40. 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
2.41. 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?

2.42. Priority Space 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. Priority Space 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.

2.43. In terms of the sites of 10 or more dwellings, with detailed planning permission, Priority Space 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?

2.44. Priority Space 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>Council View</td>
<td></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>
</tr>
<tr>
<td>14/00484/OUT</td>
<td>5</td>
<td>0</td>
<td>Permission has expired</td>
</tr>
<tr>
<td>08/01077/OUTA</td>
<td>140</td>
<td>0</td>
<td>History of planning, lack of developer interest in this site. Priority Space do not consider this site should be relied on for a source of supply within the Plan.</td>
</tr>
</tbody>
</table>
2.45. In relation to sites with planning permissions in principle, Priority Space 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?**

2.46. Priority Space 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. Priority Space would expect a minimum of 12-18 months from planning permission to start on site, and a further 6 months until the first completion. Priority Space 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.

2.47. 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?**

2.48. Priority Space 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.
2.49. 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.

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

2.51. Priority Space consider that the trajectory as set out in Figure 3 should be reviewed, and based on realistic assumptions of expected deliver.

**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?**

2.52. 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, Priority Space have summarised their view of five year supply in the table below.

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

| B) Sites of 10 or more with detailed planning permission | |
|---|---|---|
| 3,449 | 3,104 | 3,209 (-240) |
| C) | Sites of 10 or more dwellings with outline planning permission | 1,314 | 1,183 | 1,029 (-285) |
| D) | Sites with a grant of planning permission in principle | 119 | 119 | 114 (-5) |
| E) | Allocations without planning permission | 1,561 | 1,405 | 1,405 (10% non implementation) |
| F) | Windfall Allowance | 1,000 | 1,000 | 400 (-600) |
| G) | Total | 8,229 | 7,518 | 6,694 |

2.53. Therefore, further sites need to be identified in the Borough. Priority Space suggest the following available, suitable and achievable sites:

**Site 273, Askern Road, Carcroft**

2.54. Priority Space **suggests that Site 273, Askern Road, Carcroft should be allocated and should be identified as a housing site.**

2.55. The site at Askern Road Carcroft is located within a mixed use area with employment uses to the south, and residential areas to the north and west of the site. It is within walking distance of bus and train services, local services, including a school and community facilities and a wide range of shops. The site is therefore in a sustainable and appropriate location for housing growth. New housing should be located in Carcroft to secure its renewal and regeneration.
2.56. The Askern Road site should therefore be allocated to deliver housing in the short term. A robust Green Belt boundary can be created following the well defined drainage, ensuring that the Green Belt is defined using readily recognisable features to ensure permanency and providing a robust boundary.

2.57. Priority Space 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.

The deliverability and benefits of the Askern Road, Carcroft site are contained in the attached Advocacy Report

Q5.12. Is the approach set out in policy 2 part 5 to allowing development adjacent to the Development Limits of the Main Urban Area, Main Towns, and Service Towns and Villages if a five year borough-wide supply of housing land cannot be demonstrated justified and consistent with national policy?

2.58. Priority Space has no specific comment in relation to this issue.

Proposed Change

2.59. 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 273
Appendix 1: Site 273 Askern Road, Carcroft.
Carcroft

ASKERN ROAD

Priority Space
Introduction

The land at Askern Road presents a sustainable development opportunity to provide new housing for the Borough of Doncaster. The site is being promoted by Priority Space as a development opportunity that can deliver circa 200 dwellings.

This advocacy document has been produced for the site at Askern Road, Carcroft. The site is being advocated to Doncaster Metropolitan Borough Council as part of the Local Plan Review. This document presents information to support the allocation of this site and to underline the site’s suitability and deliverability credentials.

The Site

The site is located to the east of Carcroft in an area currently designated as Green Belt despite being enclosed on three sides by existing development. It is circa 9.27 Ha in area. The site is in an area on the eastern edge of Carcroft within 10 mins walk (800m) of Carcroft High Street which functions as a Local Centre with a variety of Centres as well as 15 mins walk from Askern Railway Station and Carcroft Industrial Estate.

Within 5 minutes walk of the site major bus routes offering buses to Doncaster Town Centre every 10 minutes There is Carcroft Primary School within 700m of the site providing primary school education and Outwood Academy Adwick within 1.6 miles offering secondary education.

The site is located close to the A19 Doncaster Road which provides direct routes into Doncaster Town Centre, approximately 5 miles to the south. Great North Road which passes through Adwick le Street links to the A1 with a junction less than 2 miles from the site. This gives the site easy access to local and regional employment opportunities.

The site is adjacent to existing housing to the north and west - with employment to the south of Askern Road. The site represents a highly sustainable development opportunity with access to existing facilities and services. It is a logical extension to Carcroft for circa 200 new homes and supports the continued housing and economic growth of the Borough.

Scope

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

An indicative masterplan for the site will show the potential for the site including green and blue infrastructure, movement and connectivity. The masterplan shows a scheme based on a number of technical assessments including highways, ecology, flood risk and ground. 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.
Green Belt land to be re-designated
Planning and Regeneration Need

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

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

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

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

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.

There should be a regeneration focus in Carcroft-Skellow which should elevate the status of the settlement commensurate to its role and function. Carcroft-Skellow is a highly sustainable settlement, but is only identified as a Service Town and Village which is proposed to accommodate 255 dwellings. However, the Settlement Audit (May 2015) demonstrates that the settlement sits within the top 10 settlements within the Borough based on primary services and facilities.

Carcroft-Skellow has a primary school and a high street with a range of shops including an Asda Superstore and a number of local shops and services offering a range of services. The proximity of these services and a number of businesses to the Askern Road site creates employment opportunities to any potential incoming residents into the locality. The settlement is therefore able to and should accommodate more development, which would assist the regeneration and renewal of the settlement and assist in the economic and housing growth aspirations of the Borough and Region.

Carcroft-Skellow is in a prime strategic location near to significant existing and proposed employment parks and further housing provided in the settlement would ensure Doncaster benefits from such inward investment.

The single proposed allocation in Carcroft-Skellow (Site 165/186) is located off-centre and will not benefit in relation to regeneration and economic growth to the same extent a site adjacent to the centre of the settlement.

The Askern Road site therefore represents an opportunity to provide quality housing in a sustainable location to go towards meeting the housing needs of delivering much needed new homes within Carcroft-Skellow.
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 site is being promoted by Priority Space which further demonstrates the site’s deliverability.

Availability
The land is being promoted by Priority Space. The site is therefore available in accordance with the Framework and the National Planning Practice Guidance (PPG).

Suitability
A site is suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable mixed communities.

The site is adjacent to a partially underdeveloped UDP housing allocation (PH3/15 – Owston Road, Carcroft – 86 homes). It is considered the UDP allocation will be brought forward through the emerging Local Plan and therefore there is potential for any future housing allocation to include the site as part of a larger housing allocation for sustainable growth in Carcroft and Skellow.

The land at Carcroft is a highly appropriate site to assist with the housing need in Doncaster. The site is capable of delivering a residential scheme in a sustainable location with significant regeneration, infrastructure, and economic, environmental and recreational benefits.

The site is within the settlement of Carcroft and Skellow which is a highly sustainable area as evidenced by the findings from the Settlement Audit prepared in May 2015 by Doncaster Council as part of the preparation of the Doncaster Local Plan. The site is well connected, within walking distance of bus and train service, local services including a school, community facilities and a wide range of shops. The site is accessible by a variety of modes of transport and is therefore suitable for development.

With reference to the Environment Agency’s flood risk maps, the site is within Flood Zone 3a, although it has not flooded in recent years. Furthermore, in the wider context the majority of Carcroft-Skellow is within Flood Zone 3 and as such these areas will need to be fully considered for new housing to further the regeneration potential of the settlement.

Walker Ingram have undertaken a Flood Risk and Drainage Appraisal. Consultations with the Environment Agency demonstrate that the site has not flooded for over 70 years and did not flood in 2007 with defences containing the flood water. The site satisfies the Sequential and Exception Tests and the development provides wider sustainable benefits to the community that outweigh any indications of potential flood risk. In relation to development of the site the drainage report concludes that solutions are available and the site is capable of being developed for housing.

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

Key

- Site
- Green Belt land to be re-designated
Green Belt

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

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

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

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

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

Contextually, the site is “contained” by development and activity being a “tongue” of land which protrudes into the urban area of Carcroft-Skellow surrounded by residential properties, a housing allocation and the employment land. Within this context the release of the site from the Green Belt has limited impact on “openness” and that redevelopment of the site would have low impact on the purposes of including land within the Green Belt.

The Framework states that Green Belt boundaries should be drawn so as not to include land which it is unnecessary to keep permanently open. The impact on the openness of the Green Belt will be limited. The site is bounded by the urban area to the north, east and south. To the south is Askern Road with employment uses beyond, to the north is housing and to the west is a housing allocation and Owston Road, which has housing and a primary school and some local businesses.

The site is therefore “contained” and will not lead to unrestricted sprawl or encroachment. It is clear from the site location plans and analysis that development of the site would not have a material impact on the Green Belt. The development of this site will not have a significant impact on any of the reasons for the Green Belt designation in the area. The new Green Belt boundaries will be drawn to provide a long term robust boundary. The development will therefore not result in the coalescence of neighbouring towns, and will not encroach on the countryside nor affect the setting and special character of an historic town.

The new Green Belt boundary would “round off” Carcroft-Skellow and follow the defined drainage which is clear and well defined. This boundary would accord with the Framework and ensure that the Green Belt is clearly defined using readily recognisable features to ensure permanency reinforcing the urban context whilst providing a robust boundary for the future.

All the boundaries have the potential to be further reinforced within the site through additional planting to ensure an effective transition between the development and the countryside beyond.
The Askern Road site is located on the eastern boundary of Carcroft, a settlement to the North West of Doncaster. The site is within walking distance of Carcroft Centre (under 800m) and there is a regular bus and rail service which is close to the site connecting the area with central Doncaster and beyond.

The proposed site is located on the eastern edge of Carcroft adjacent to the urban area and a number of existing facilities.

The site is within walking distance to the Carcroft Asda Superstore as well as a number of services and facilities including convenience and retail shopping along High Street.

The Carcroft Health Centre off Chestnut Avenue is the closest GP practice and there is a pharmacy close by along High Street. The nearest major hospital is the Doncaster Royal Infirmary which is 6.6 miles away and would provide employment opportunities within and around Doncaster.

Owston Park Primary and Carcroft Primary School, to the north west of the site provide primary education. Both of these schools are approximately 20 minutes walk (1 mile) from the site. The closest secondary school is Outwood Academy Adwick which is located approximately 11 mins on a bus. This service is regular running every 10 mins along the B1220.

The nearest bus stop is a 4 min walk west of the site and runs along the B1220 connecting Carcroft with Woodlands and Doncaster central. It takes approximately 30 mins to get to the centre of Doncaster and the service runs every 10 mins.

The nearest station is Adwick Interchange. This is 0.8 miles from the site and the rail line runs from Adwick to Doncaster running south and Wakefield Westgate and Leeds running North.

Doncaster, Leeds and Wakefield Westgate stations are extremely well connected by the East Coast Mainline with services to London, Newcastle, Manchester Airport, York, Sheffield, Penzance and Hull among other places. The ease of access to the station from the site using public transport adds to the sustainability of the site.

### ACCESS TO FACILITIES

<table>
<thead>
<tr>
<th>Facility</th>
<th>Distance to closest (miles)</th>
<th>Approx. journey time (mins)</th>
<th>Location</th>
</tr>
</thead>
<tbody>
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<td>Supermarket</td>
<td>0.3 miles</td>
<td>7 mins walk</td>
<td>High Street</td>
</tr>
<tr>
<td>Post Office</td>
<td>0.5 miles</td>
<td>10 mins walk</td>
<td>Sandford Road</td>
</tr>
<tr>
<td>Library</td>
<td>1.7 miles</td>
<td>11 mins walk/bus</td>
<td>Windmill Balk Lane</td>
</tr>
<tr>
<td>Village Centre</td>
<td>0.4 miles</td>
<td>9 mins walk</td>
<td>High Street</td>
</tr>
<tr>
<td>GP Surgery</td>
<td>0.5 miles</td>
<td>11 mins walk</td>
<td>Chestnut Ave</td>
</tr>
<tr>
<td>Hospital</td>
<td>6.6 miles</td>
<td>21 mins car</td>
<td>Thorne Road</td>
</tr>
<tr>
<td>Dentist</td>
<td>0.9 miles</td>
<td>17 mins walk</td>
<td>Skellow Road</td>
</tr>
<tr>
<td>Nursery</td>
<td>0.5 miles</td>
<td>9 mins walk</td>
<td>Owston Road</td>
</tr>
<tr>
<td>Primary School</td>
<td>0.4 miles</td>
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<td>Owston Road</td>
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<tr>
<td>Secondary School</td>
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<td>11 mins walk/bus</td>
<td>Windmill Balk Lane</td>
</tr>
<tr>
<td>Playground</td>
<td>0.3 miles</td>
<td>7 mins walk</td>
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<td>0.8 miles</td>
<td>8 mins walk/bus</td>
<td>Adwick Interchange</td>
</tr>
</tbody>
</table>
View from the north-eastern corner of the site looking downhill towards the disused Askern Road.

View from Askern Road looking towards the settlement of Carcroft.

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

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

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

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

View from the south west corner looking north.

View east along Askern Road along southern site boundaries.
A SWOT analysis has been undertaken with the conclusions used to inform the design process. Detailed technical reports have also been undertaken and are summarised in the following sections of this Advocacy Report. In addition, Priority Space is promoting the site and will ensure the site would be delivered expediently.

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

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

The site at Askern Road provides a number of opportunities which any proposed development can utilise in order to add to the area neighbourhood and to integrate the development into Carcroft.

The Site
The total site is approximately 9.27ha located to the north of Askern Road.

Topography
The site is flat with deep drains along the boundary and within the site. To the south east of the site is a mound which is a Veolia landfill site.

Access
Askern Road is a long road abutting the edge of the site providing multiple opportunities for highways access. There is no existing footway along the site frontage so a new footway construction to link in to the existing footway on Askern Road would be delivered as part of the development to create a direct link for pedestrians and cyclists.

Ecology
The site is of low ecological value, however the Wellsyke Drain and Morley Well Drain should be buffered to maintain a connective function for wildlife and be the focus of ecological enhancement.

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

Drainage
There will be a requirement to introduce some mitigation measures to ensure that the development will be safe, without increasing flood risk elsewhere, which include raising finished floor levels and flood resilient construction and design.
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 little fauna interest on the site with the site of limited value to foraging bats and no recordings of Otters, amphibians, badgers or water vole. Furthermore, the site is unlikely to be of significance for birds.

**Drains**

Two large drains interact with the Site, these being Wellsyke Drain and Morley Well Drain. Both look to support a permanent source of flowing water and merge towards the centre of the eastern boundary. The drain then continues south, passing through the centre of the site, under the name of Morley Well Drain.

Wellsyke Drain enters the site from the north-west, before passing along parts of the west and east boundaries and intersecting the Site to the north (delineating the northern and western most fields). Where it first enters the Site, the drain is c.3m wide (from the top of each bank), with a channel c.1.5m wide by 0.4m deep. The banks are steep and c.1.5m high.

Morley Well Drain enters the Site from the north-east and passes along part of the eastern boundary. Where it enters the Site, the drain is c.5m wide (from the top of each bank), with a channel c.2m wide by 0.5m deep. The banks are again around 1.5m high and very steep. The drain's profile remains fairly uniform as it progresses through the Site, and where it meets the southern boundary, the channel is closer to 4m wide. At the boundary, the drain is directed under Askern Road via a series of small concrete culverts.

The southern hedgerow and mature boundary trees should be retained where feasible. Where the loss of hedgerow or tree cover is required a suitable mitigation strategy will need to be designed into the Masterplan.

**Summary**

The site is of low ecological value owing to its 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 trees/hedges and wildlife corridors within the scheme.
Site Access

Figure 2 - Askern Road

Figure 3 - Existing Field Access Point Off Askern Road

Figure 5 - Bus Stops on Owston Road

Figure 6 - Proposed Site Access
Highways and Access

Curtins has undertaken an Access Strategy, which concludes that a single point of access should be provided from Askern Road. The site is in an accessible and sustainable location and the proposed scheme can be accommodated on the local highway network.

Highways
The main highway access will be taken from Askern Road. The main highway access will be around 40m to the east of the opposing access to the industrial estate. The location currently sits within the 50mph limit. However, the introduction of a new junction and the adjacent housing would extend the built up area of Carcroft and naturally suggest the introduction of a reduced speed limit as part of the development proposals.

Therefore a new section of 40mph limit is recommended that encompasses the new junction and the industrial estate junctions. This new speed limit will link in to the settlements existing 30mph limit and the rural section of 50mph speed limit on Askern Road.

Pedestrian and Cycle Infrastructure and Accessibility
The site is located in a sustainable location within walking distance of the settlement of Carcroft with its associated shops, schools and bus stops. There is no existing footway along the site frontage so a new footway construction to link in to the existing footway on Askern Road would be delivered as part of the development to create a direct link for pedestrians and cyclists.

The flat topography surrounding the site makes cycling an attractive mode of travel for potential residents. Cycling into Carcroft and Skellow along the wide and lightly used footways surrounding the site would be safe for all users. Residents could potentially cycle towards Woodlands and on to the North Doncaster Greenway (off highways and tarmacked) for trips in to Doncaster Town Centre and onwards south of the town for further leisure opportunities such as the Doncaster Dome.

Summary
Therefore, the site is in a sustainable location, with existing bus stops in close proximity to the site. Therefore, there are no substantial highways issues associated with the site and it is suitable for advocating for residential development within the local plan.
Flood Risk and Drainage

A Flood Risk and Drainage Appraisal was undertaken by Walker Ingram Associates in Sept 2018. The Environment Agency identifies the site as being in Flood Zone 3a but the site has not flooded for over 70 years.

Although the site is identified in Flood Zone 3a, the site has not flooded in recent years. The Environment Agency has provided historical flood information for the site. The flood map indicates that the last time the site was affected by floods was in 1932 & 1947, however, the flooding of June 2007 was retained behind the flood defences adjacent to the Old Ea Beck.

Furthermore, an asset location plan showing all Agency and non-Agency maintained flood defences within the vicinity of the site and a description of these defences and structures indicates that the Old Ea Beck has flood defences in place, consisting of a mixture of embankments, walls and bridge abutments.

Sequential Test
The Environment Agency Flood Map shows that the majority of Carcroft and surrounding areas as being located within Flood Zone 3. It would therefore, be very difficult to re-locate this size of development in a lower Flood Zone (i.e. 1 or 2).

Given that there are likely to be no alternative sites available at a lower risk of flooding within Carcroft, it is concluded that compliance with the Sequential Test has been demonstrated.

Exception Test
There are two parts to the Exception Test and both need to be passed in order for a development to be considered acceptable. The two parts of the Test require the proposed development to show that it will provide wider sustainability benefits to the community that outweigh flood risk and that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible, reduce flood risk overall. The site specific benefits which should be considered are as follows:

• Flood defences are in place to protect the site and surrounding areas. This is reflected in the Flood History Map showing that no flooding has occurred since 1947. Subsequent flood events were retained by the Flood Defences along the Old Ea Beck or restricted to land south of the railway line.
• The development is located adjacent to other residential areas and is a natural infill site and complies with the requirements of the relevant UDP policies.
• The proposed scheme includes for the provision of affordable housing.
• The development creates no unacceptable environmental, amenity, traffic, safety or other issues.
• The site is located within easy walking distance of the local bus stop and local services.
• The site and all its surroundings will be sterilised for new development if the Exception Test is not applicable in this instance.
• The drainage strategy will be introduced, reducing the overall surface water discharge rate to the existing greenfield runoff rate for all storm events up to the 1 in 100 year plus climate change event.

The site is therefore considered to satisfy the Exception Test and the development provides wider sustainable benefits to the community that outweigh any indications of potential flood risk. However, there will be a requirement to introduce some mitigation measures to ensure that the development will be safe, without increasing flood risk elsewhere, which include raising finished floor levels and flood resilient construction and design.
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. These elements of the masterplan will help to integrate the extended urban edge into Carcroft-Skellow.

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 Askern Road with internal loop roads within the proposed development. The scheme can also create a potential access into the adjacent housing allocation.

**Ecology**
There is potential within the illustrative masterplan within the open space to enhance local habitats.

**Access**
The masterplan allows for pedestrian/cycle linkages through the site which will allow residence to walk or cycle to facilities within the centre of Carcroft, which encourages sustainable movement in the local area.

**Residential Design**
Creation of a high quality residential extension to Carcroft-Skellow 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
Illustrative Masterplan

- POS with Underground Drainage Tank
- Embankment Buffer
- Spring Bog Plan
- Allot Gdns
The site at Askern Road, Carcroft 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, close to the centre of Carcroft which provides an opportunity to deliver new housing to meet the needs of Carcroft-Skellow and 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. There should be a regeneration focus in Carcroft-Skellow which should elevate the status of the settlement commensurate to its role and function. Carcroft-Skellow is a highly sustainable settlement and is in a prime strategic location near to significant existing and proposed employment parks and further housing provided in the settlement would ensure Doncaster benefits from such inward investment.

The Askern Road site therefore represents an opportunity to provide quality housing in a sustainable location to go towards meeting the housing needs of delivering much needed new homes within Carcroft-Skellow.

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. The site is being promoted by Priority Space, 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:

- The highway work confirms the suitability of the site access and highway network to accommodate the proposed development.
- Ecological survey work has confirmed there are no ecological constraints to the development of the site.
- Although the site is identified in Flood Zone 3a, the site has not flooded in recent years. The site satisfies the Sequential and Exception Tests and the development provides wider sustainable benefits to the community that outweigh any indications of potential flood risk.

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.

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 Askern Road, Carcroft 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 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 Carcrot and Skellow
- The delivery of circa 200 new homes in a range of house types, sizes and tenure
- Circa 700 new (direct and in-direct) jobs from the construction of the residential scheme alone
- Gross Value Added of around £14.25 million
- Circa 4.95 million Annual Household Expenditure
- At least £1 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. Discount from Supply</td>
</tr>
<tr>
<td>792</td>
<td>9</td>
<td>Stalled site, not considered likely to come forward. Discount from Supply</td>
</tr>
<tr>
<td>855</td>
<td>5</td>
<td>Stalled over a significant period, should not be relied on to contribute towards supply. Discount from Supply</td>
</tr>
<tr>
<td>959</td>
<td>9</td>
<td>Permission has expired. Discount from Supply</td>
</tr>
<tr>
<td>972</td>
<td>10</td>
<td>Permission has expired. Discount from supply.</td>
</tr>
<tr>
<td>979</td>
<td>5</td>
<td>No start, permission has expired. Discount from supply.</td>
</tr>
<tr>
<td>1071</td>
<td>10</td>
<td>No start recorded. Expired in 19/20 monitoring period. Discount from supply.</td>
</tr>
<tr>
<td>1077</td>
<td>9</td>
<td>Industrial units remain in place, pre start conditions have not been discharged. Permission expires August 2020. Discount from supply</td>
</tr>
<tr>
<td>977</td>
<td>10</td>
<td>Not available for residential development. Discount from supply.</td>
</tr>
<tr>
<td>1062</td>
<td>5</td>
<td>Potential viability issues. Should not be relied on to contribute towards supply. Discount from supply.</td>
</tr>
<tr>
<td>946</td>
<td>5</td>
<td>Permission has expired. Discount from supply</td>
</tr>
<tr>
<td>992</td>
<td>6</td>
<td>Permission has expired. Discount from supply</td>
</tr>
<tr>
<td>No.</td>
<td>Value</td>
<td>Description</td>
</tr>
<tr>
<td>-----</td>
<td>-------</td>
<td>-------------</td>
</tr>
<tr>
<td>960</td>
<td>13</td>
<td>No sign of start, permission has lapsed. <strong>Discount from supply</strong></td>
</tr>
<tr>
<td>856</td>
<td>6</td>
<td>Site appears to have stalled. Should not be relied upon to contribute towards supply. <strong>Discount from Supply</strong></td>
</tr>
<tr>
<td>951</td>
<td>28</td>
<td>No start recorded, permission expired in 18/19. <strong>Discount from supply.</strong></td>
</tr>
<tr>
<td>958</td>
<td>79</td>
<td>Outline consent in 2015, no delivery on site in 18/19. <strong>Discount from supply.</strong></td>
</tr>
<tr>
<td>569</td>
<td>220</td>
<td>Long standing and unimplemented permission that has been available and remains undeveloped. Lack of developer interest. The site should not be relied upon to contribute towards the supply. <strong>Discount from supply.</strong></td>
</tr>
<tr>
<td>628</td>
<td>7</td>
<td>A start was recorded in 2013/14, no delivery has been recorded on site. The site has stalled. <strong>Discount from supply.</strong></td>
</tr>
<tr>
<td>955</td>
<td>16 (10)</td>
<td>The capacity of this site should be reduced from 16 to 6 to reflect application 19/02787/FUL). <strong>Discount 10 units from the supply</strong></td>
</tr>
<tr>
<td>956</td>
<td>16</td>
<td>No evidence that the site can be delivered. The council have discounted this site within their latest five year supply assessment. This should not be relied on to contribute to the supply within the Plan. <strong>Discount from the supply.</strong></td>
</tr>
<tr>
<td>1076</td>
<td>7</td>
<td>No start, recorded permission expires in September. Should not be relied upon to contribute towards the supply. <strong>Discount from the supply.</strong></td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>524</td>
<td></td>
</tr>
</tbody>
</table>