Hearing Statement – Matter 5

Doncaster Local Plan

On behalf of Strata Homes

August 2020
1. Introduction

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

   Matter 5: Housing Supply

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

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

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

Q5.1. Was the approach to determining which sites to include as housing allocations in the Plan described in the Site Selection Methodology and Results Report justified and consistent with national policy and guidance?

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

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

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

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

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

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

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

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

- Site 234 Broad Axe, MUA. This site was a previous draft allocation and performs better in the sustainability appraisal than Doncaster MUA sites 350, 241, 164/430 and 33,

2.9. Taking into account the above, Strata Homes are concerned that the Sustainability Appraisal and Sustainability Appraisal Addendum do not therefore seem to have consistently informed the Plan, and SDEB 46 is not sufficiently clear to provide clarity for the role of the Sustainability Appraisal in the site selection process.
2.10. Strata Homes have significant concerns that the site selection process and identification of Reserve Sites has been informed by an inadequate evidence base, with particular regards to flood risk. Strata Homes considers there is an urgent need for a Level 2 SFRA to inform the Plan and site selection process.

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

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

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

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

2.15. Strata Homes are concerned that there has been an overreliance on extant planning permissions without sufficient regard to the planning history of the site, developer interest, and likely viability. This is including but not limited to the following sites:
• Site 838 – This is a longstanding site that has not been developed. This site was included in the Publication Version of the Plan, with a capacity of 930. It is noted that the capacity has been reduced to 671 in the Minor Modifications [CSD 5]. This is to reflect a current planning application 19/01982/FULM. It is acknowledged that there is a recommendation to grant approval. The Officer’s report notes that the scheme is unviable and is reliant on grant funding from Homes England. However, at the time of writing, the decision notice had not been issued and funding had not been agreed. As a minimum the delivery forecast in the first five years of the plan should be significantly discounted. If there is no evidence that funding is likely to be forthcoming, the site should be discounted from the supply due to significant viability issues [671 units].

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

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

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

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

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

2.17. It is crucial that the site selection process is undertaken in a consistent and objective way. Our analysis indicates that this has not been the case and thus the site selection process is not justified and is not consistent with national policy, and is considered unsound.
Q5.2. Assuming it is modified to include the figures in CSD6, does the Plan identify sufficient land to ensure that the strategic aim of delivering 18,400 new homes in the Plan period 2015 to 2035 can be achieved? In particular, is there a reasonable prospect of:

a) 9,289 new homes being built on allocations with planning permission at 2018?
b) 585 new homes being built on other commitments at 2018?
c) 6,630 new homes being built on allocations without planning permission at 2018?

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

Part A

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

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

2.21. Furthermore, there are a number of sites that are included in the list of allocations with permission, which we do not expect to come forward at the rate forecasted within the submission Plan.

<table>
<thead>
<tr>
<th>Site Ref</th>
<th>Site Name</th>
<th>No. of Dwellings</th>
<th>Strata Homes Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>843</td>
<td>Manor Farm, Bessacarr</td>
<td>1,009</td>
<td>This is a Persimmon / Charles Church scheme. However, delivery has become frustrated by the need to deliver infrastructure to complete development. Since there is only one developer on the site the development trajectory is likely to be modest and development of the site is unlikely to be achieved during the plan period. The Residential Land Availability Report indicates 39 completed in 17/18, and the 2018/19 RLA indicates 56 units were delivered in 18/19. The delivery rates achieved are below the rates expected in the Local Plan and HELAA, which assumes delivery rates of around 70 dwellings a year. This is not realistic based on current delivery. 908 units remained to be delivered at end of 2018/19 monitoring period. The Deliverable Housing Land Supply Statement does not provide any further update/explanation to support delivery at the site 350 units are indicated to be deliverable in the next 5 years/ years 0-5 of the Plan</td>
</tr>
<tr>
<td>Site Ref</td>
<td>Site Name</td>
<td>No. of Dwellings</td>
<td>Strata Homes Comment</td>
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<td>---------</td>
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<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>418</td>
<td>Unity/DN7 Initiative</td>
<td>1015</td>
<td>The site has outline planning permission for 3,100 homes and 20/01197/REMM – details of appearance, landscaping, layout and scale for a estate road from Hatfield Links Road into Unity Connect, Awaiting Decision. Discharge of Conditions in relation to drainage submitted on 4th May 2020. The site is in significant multiple ownership and we understand that CPO procedures will be employed to facilitate the delivery of requisite infrastructure. Homes England is also assigning public funding to support the development. Given the presence of multiple landowners, the need for considerable public funding, the likelihood of a protracted timeframe to open up the site for development and the absence of confirmed market interest, the site is unlikely to deliver the Council’s prediction of 1015 homes in the plan period. The Council anticipates delivery of 175 dwellings in years 0-5 of the Plan SDEB 26 confirms that there was no delivery in 2018/19. 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.</td>
</tr>
<tr>
<td>1057/ANP</td>
<td></td>
<td>400</td>
<td>The latest RLA indicates that there was no delivery in 18/19. A Reserved Matters has been submitted (20/01421/REMM). The decision is pending. There is little evidence to support the delivery of 280 dwellings in the remaining years of years 0 -5 of the Plan.</td>
</tr>
</tbody>
</table>

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

Part B

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

Part C

2.24. Strata Homes has reviewed the allocations without planning permission. We consider there is insufficient evidence demonstrate that there is a reasonable prospect of the following sites coming forward.

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

2.25. Based on this the above list Strata Homes consider it would be appropriate to allow for non-implementation of allocations without permission. Strata Homes have identified a minimum reduction of 128 dwellings, but given the history and constraints that impact on other sites this could feasibly be higher.
2.26. It is noted that the supply attributed to completions appears to be resultant from gross completions rather than net completions. The Plan indicates that completions between 2015 and 2018 equate to 3,400 homes. However, data in the Residential Land Availability Report indicates that net completions amount to 3,211 dwellings which would serve to increase the residual requirement based on an OAN of 920 dwellings to at least 15,189 dwellings, and reduce the flexibility in the Plan to 866 dwellings (4.7%), which is insufficient for a Borough seeking growth.

<table>
<thead>
<tr>
<th></th>
<th>Council Figures</th>
<th>Spawforths</th>
<th>Comments/justification</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Net Completions 2015-2018</strong></td>
<td></td>
<td>3,400</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</strong></td>
<td></td>
<td>3,211</td>
<td></td>
</tr>
<tr>
<td>with planning permission at 2018</td>
<td></td>
<td>9,289</td>
<td>Allows for 10% non-implementation rate, in line with evidence on lapsed/stalled sites.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>8,360</td>
<td></td>
</tr>
<tr>
<td><strong>Expected completions on</strong></td>
<td></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>completions not in allocated sites (small sites and in defined villages)</td>
<td>585</td>
<td>468</td>
<td></td>
</tr>
<tr>
<td><strong>Expected completions on</strong></td>
<td></td>
<td>5,967</td>
<td>Based on a discount of 128 dwellings / 10% non-implementation</td>
</tr>
<tr>
<td>allocations without planning permission</td>
<td></td>
<td>6,502</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>6,630</td>
<td></td>
</tr>
<tr>
<td><strong>Total 2015 to 2035</strong></td>
<td></td>
<td>19904</td>
<td>Range dependent on discount on completions on allocations without planning permission.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>18,006</td>
<td></td>
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<td></td>
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<td>18,421</td>
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</tbody>
</table>
Q5.3. Should Table 5 of the Plan be modified to include the following, having regard to policies 2, 3 and 11 relating to development on unallocated sites and policy 7 relating to Doncaster Sheffield Airport:

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

Part A

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

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

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

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

**Part B**

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

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

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

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

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

Part D

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

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

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

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

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

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

2.40. Strata Homes consider that table 5 should be modified in line with response in Q5.2
Q5.5. Will the Plan be effective in helping to ensure that at least 10% of the housing requirement is met on sites no larger than one hectare? Is it necessary to modify paragraph 4.81 of the Plan as set out in the Council’s response to PQ31?

2.41. Strata Homes has no specific comment in relation to this issue.

Q5.6. Is the proposal in policy 3 to have a variable figure for the five year requirement consistent with national policy? Would it be effective in helping to ensure that the need for homes identified in the Plan can be met? If not, how should the five year requirement be calculated?

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

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

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

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

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

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

2.47. In terms of the sites of 10 or more dwellings, with detailed planning permission, Strata Homes consider 240 units should be discounted from the category B supply. Of these, 20 have lapsed and other sites have stalled, or there is limited developer interest.
Q5.8. Has the Council provided clear evidence that a total of 2,833 dwellings will be completed on sites of 10 or more dwellings with outline planning permission, sites with a grant of planning permission in principle, and allocations without planning permission by 31 March 2024?

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

<table>
<thead>
<tr>
<th>Reference</th>
<th>5 year capacity</th>
<th>Spawforths</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></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>
</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. Strata Homes do not consider this site should be relied on for a source of supply within the Plan.</td>
</tr>
</tbody>
</table>
2.49. In relation to sites with planning permissions in principle, Strata Homes has reviewed the information within SDEB 27, which indicates that development has stalled on four of these sites - this amounts to 5 dwellings. This indicates that whilst only sites with starts have been included, it remains appropriate to include a non-implementation rate of circa 5%.

<table>
<thead>
<tr>
<th>Reference</th>
<th>Capacity</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>16/01087/PRIOR</td>
<td>3</td>
<td>Start was recorded in 16/17, only 1 unit completed, no completions during 18/19.</td>
</tr>
<tr>
<td>15/00221/P3JPA</td>
<td>2</td>
<td>Start recorded in 15/16, 1 completion recorded, no completions in 18/19.</td>
</tr>
<tr>
<td>15/01806/PIAPA</td>
<td>2</td>
<td>Start recorded in 16/17, 1 completion recorded, no completions recorded in 18/19.</td>
</tr>
<tr>
<td>14/02462/PIAPA</td>
<td>1</td>
<td>Start recorded in 14/15, however no completions recorded to date.</td>
</tr>
</tbody>
</table>
Q5.9. Is the inclusion of a windfall allowance of 1,000 dwellings in the five year supply from 1 April 2019 justified? Would there be “double counting” with some of the 4,886 dwellings on sites with full or outline planning permission on 1 April 2019?

2.50. Strata Homes considers that there is a need to adjust the windfall allowance that is included within the five year supply from 1st April 2019. The windfall allowance of 1,000 dwellings in the five year supply is based on an annual allowance of 200 dwellings. The five year supply arising from sites with full or outline planning permission will include supply from ‘known’ windfalls (windfall sites with permission). It is unrealistic to assume that permission(s) for 200 dwellings on an unknown windfall site(s) in Year 1 will result in 200 additional completions in Year 1. Strata Homes would expect a minimum of 12-18 months from planning permission to start on site, and a further 6 months until the first completion. Strata Homes consider that no windfalls can really make a difference to supply in the first two years. Equally, permissions granted on unknown windfall sites in years 4 and 5 are unlikely to make any contribution to completions within the five year supply.

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

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

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

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

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

Q5.11. Does the trajectory demonstrate that the Plan will be effective in ensuring that there will be a supply of specific deliverable sites sufficient to meet an appropriately calculated five year requirement when the Plan is adopted and thereafter?

2.56. Figure 3 indicates that there will be a sufficient supply of housing in the five years following adoption, however as indicated above, we consider that this may have been based on unrealistic assumptions regarding anticipated delivery rates and thus should be reviewed. For simplicity, Strata Homes 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>A) Sites of fewer than 10 dwellings with permission</td>
<td>786</td>
<td>707</td>
</tr>
<tr>
<td>B) Sites of 10 or more with detailed planning permission</td>
<td>3,449</td>
<td>3,104</td>
</tr>
</tbody>
</table>
2.57. Therefore, further sites need to be identified in the Borough. Strata Homes suggest the following available, suitable and achievable sites:

**Site 234, Broad Axe, Scawthorpe, Doncaster MUA**

2.58. Strata Homes suggests that Site 234 at Broad Axe, Scawthorpe, which was previously identified as a draft allocation, should be reinstated as an allocation and should be identified as a housing site.

2.59. The site at Broad Axe, Scawthorpe is located on the edge of Scawthorpe with established residential area on three sites. It has easy access to a full range of services and facilities located within Scawthorpe/Skawsby/Bentley Rise, as well as Doncaster itself. The site is therefore in a sustainable and appropriate location for housing growth. New housing should
be located on the western side of Doncaster to ensure Doncaster maximises the economic
growth potential of these major inward investors.

2.60. Site 234 Broad Axe, Scawthorpe should therefore be allocated to deliver housing in the short
term. A robust defensible Green Belt boundary can be created that respects the topography
and wider landscape.

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

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

**Proposed Change**

2.63. 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.
Appendix 1: Site 234, Broad Axe, MUA
Advocacy
Introduction

The land at Broad Axe Field, Scawthorpe presents a sustainable development opportunity to provide much needed new housing for the Doncaster Main Urban Area and the wider borough. The site is being promoted by local developer Strata Homes and presents an opportunity that can deliver circa 500 dwellings.

This delivery statement has been produced for the site at Broad Axe Field, Scawthorpe.

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

The site is located to the north-west of Scawthorpe in an area currently designated as Green Belt. It is circa 21 Ha in area. The site is within 5 mins walk (400m) from Great North Road / York Road with good access to major bus routes. It is also approximately 1 mile from Scawsby local centre.

The site has been promoted for inclusion in previous development plans and was previously a Draft Local Plan allocation. Broad Axe Field creates a logical in-fill between two elements of the existing urban area (Scawthorpe and Scawsby). The proposed site boundary follows the line of an existing hedgerow. The site completes the urban block with this allocation utilising Green Lane and the Roman Ridge to provide a new robust Green Belt boundary.

The site is well connected. There is Rosedale Primary School on the boundary of the site, Don Valley Academy on the other side of York Road and Ridgewood School within 0.5 miles. The latter of these schools offer secondary and sixth form education.

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

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

Objectives

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

Scope

The scope of this document is to set out the credentials for land at Broad Axe Field, Scawthorpe as a residential development opportunity and to seek its allocation as a housing site through the Local Plan Review. This is set in the context of the opportunity that the site provides to contribute towards delivering new housing for Doncaster and the economic growth aspirations for the wider Borough.
Who are Strata Homes?

Based at Quay Point at Doncaster Lakeside, Strata Homes are a local house builder committed to delivering innovative housing. As a Doncaster firm Strata Homes are always looking for opportunities to support the growth of their home town through the delivery of new homes and the creation of jobs.

A design led housing developer based in Doncaster and operating across the whole of Yorkshire and the Midlands. Strata Homes are seeking to expand the area of operation to allow growth of the business.

In this industry, it’s unusual for a company of Strata’s size to have just one office, but it makes perfect sense. Strata have made Quay Point a very special building that plays a key role in everything Strata do.

The Quay Point building is where the team, partners and customers come together to plan, collaborate and share ideas. In order to fulfil Strata’s purpose, strata have created a space that reflects our spirit; a different kind of working environment; a place that would embody Strata’s values and allow their unique culture to flourish.
DMBC UDP Map 3 Combined 1998: Doncaster North
Housing Need

There is a significant and recognised housing crisis within the UK. The country needs to provide around 300,000 homes per year to keep up with population growth and to start to tackle years of undersupply. Strata believe Doncaster’s housing need over the plan period should be between 1,100 and 1,300 dwellings per annum to support planned future economic growth.

The revised National Planning Policy Framework, 2019 (The Framework) states that local authorities should meet their objectively assessed housing needs in full and seeks to boost significantly the supply of housing. The Local Plan - Publication Version recognises the need to deliver a sufficient supply of housing and support economic development and growth to create sustainable communities.

The current wider economic context in the country is also relevant. The economic decline and associated recovery, its impact on the housing market and increasing housing crisis means schemes that assist economic and housing growth, are high on the Governments priorities. The Localism Act, The Framework, Ministerial statements and budgets recognise the importance of housing and significant economic imperative of encouraging new development proposals.

The Borough of Doncaster is located on the crossroads of the main arterial routes of the A1(M) and M18 Motorways as well as being a major station on the East Coast Mainline and on a key route between the Region and the east coast ports.

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

A quality housing offer has a crucial role to play in the achieving this goal. It is essential to attracting and retaining a skills base that supports inward investment, meeting existing and future community needs and retention of Sheffield City Region (SCR) talent. Doncaster has been one of the fastest growing economies in Yorkshire and Humber. The district has created around 21,000 jobs between 2000 and 2016, representing a growth rate of 1% per annum.

Whilst this economic growth is to be applauded it is not matched by the required housing growth. It has been identified that between 70,000 and 100,000 additional homes are needed in SCR, to support the proposed economic growth over the next 10 years. These will have the dual benefit of providing accommodation that underpins the proposed increase in employment (70,000 jobs), as well as the wider economic benefits that housing investment brings.

The Publication version of the Local Plan has set a proposed housing target of 920 dwellings per annum. Regeneris have been commissioned by Strata Homes to review the OAN and the Economic Forecasts and Housing Needs Assessment (2018). Regeneris consider that Doncaster’s housing need over the plan period should be 1,100 dpa to support future economic growth. Regeneris consider that the target of 920 dpa would risk constraining the future economic growth of Doncaster.

Strata have also questioned the housing and employment balance in the Publication Plan and consider that that the housing requirement could be even higher.

The Broad Axe Field site is located just beyond the Doncaster Main Urban Area in Scawthorpe. The Main Urban Area is required to provide 50% of the housing growth (c. 6,615 homes over the plan period). The Broad Axe Field site represents an opportunity to provide quality housing in a sustainable location to go towards meeting the housing needs of Doncaster.
Housing Distribution

The spatial strategy and distribution should provide an appropriate development pattern and support economic growth and sustainable development within all market areas. It is important that the Council plans for new jobs and associated new homes in accordance with appropriate planned for economic growth aspirations.

To appropriately distribute the housing growth within the Borough, Strata consider the Local Plan should:

- Focus the majority of development upon Doncaster Main Urban Area but review the likely housing yield from existing sites with planning permission and proposed allocations to ensure that they can all be delivered within the Plan Period.
- Focus growth and regeneration on the Main Towns of appropriate scale for their needs and the economic growth aspirations of the Borough.
- Provision should be made in the Service Towns and Larger Villages to reflect their scale and function.
- These are sustainable towns and villages which serve a hinterland.

Doncaster is the main focus of development in the borough and will accommodate at least 50% of housing growth over the plan period. Doncaster main urban area provides services for the whole Borough.

The Main Urban Area is defined as the contiguous built-up area of Doncaster comprising a number of distinct but connected districts arranged around the town-centre, including Doncaster town centre, Balby/Woodfield, Belle Vue, Bentley, Bessacarr, Cantley, Clay Lane, Cusworth, Edenthorpe, Hexthorpe, Hyde Park, Kirk Sandall, Intake, Richmond Hill, Scawsby, Scawthorpe, Warmsworth and Wheatley.

The approach to Distribution of growth in the Publication Local Plan establishes the strategic approach to the Green Belt within Doncaster and states that the general extent of the Green Belt will be retained. Green Belt boundaries have been drawn tightly around settlements and proposed allocations and as such do not have regard to the intended permanence in the long term so that the boundaries can endure beyond the Plan period.

The work undertaken by Regeneris on housing and economic growth in Doncaster concluded that the publication plan target of 920 dwellings per annum will not meet the growth requirements of the borough. Regeneris recommend a housing target of circa 1,100 dwellings per annum to meet the economic growth aspirations of the borough. Furthermore, with housing and employment imbalance it could be potentially higher. It follows then, that the Council will need to allocate more housing sites to accommodate the required growth rate. In particular, more housing sites should be allocated in the main urban area.

The Broad Axe Field site is located at the edge of the main urban area of Doncaster which is the main focus for growth in the district. As such the site is located in a demonstrably suitable location for growth. Re-instating the land at Broad Axe Field as a housing allocation will assist the Borough to meet its stated aims of meeting half of the planned housing growth through allocations in the main urban area.
Available and Suitable

The proposed housing development at Broad Axe Field will benefit Doncaster and the wider Borough with economic, environmental and social benefits. The site is extremely well located within the Main Urban Area with a large number of existing facilities and services close by. Broad Axe Field is therefore considered to be suitable for development.

Available

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

Suitable

The core objectives of the National Planning Policy Framework are to promote sustainable development and growth. The Framework sets out to boost significantly the supply of homes. It states that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change. The key focus is to create the conditions to allow for sustainable development.

Broad Axe Field is adjoining to the main urban area of Doncaster. The main urban area is identified as the focus for economic and housing growth and should be accommodating more housing. The Publication version of the local plan states that at least 50% of new homes will go to the main urban area. An Allocation in this location supports the spatial approach set out within the local plan.

The site is located within land which is designated as Green Belt encroachment. However, the site is surrounded by development on three sides. The site does not perform any of the Green Belt purposes, as explored further in the greenbelt section of this document. Development of this site as a sustainable residential site will not have a significant negative impact upon the Green Belt land beyond its natural boundaries.

The site is located within the Main Urban Area of Doncaster, which is less than 3km away. There are a number of primary and secondary schools within the vicinity of the site.

The land at Broad Axe Field was allocated for housing development in a previous iteration of the Local Plan. This demonstrates that the Council believes, it is a suitable location for new residential development. Strata Homes’ contention is that the site should be reinstated as an allocation for residential development.

The land at Broad Axe Field is in a suitable location for new housing development, it is surrounded by existing residential development and represents an infill site. It is located immediately to the west of York Road. It is currently an arable field which is being used for agricultural purposes. A Roman Ridge provides the western boundary of the site, which is now used as a pedestrian and cycle path. Beyond the Roman Ridge there is a Primary School (Scawsby Rosedale) and existing housing developments. Existing housing developments adjoin the southern boundary on Stanley Road. To the east beyond York Road is the Don Valley Academy. To the north there is existing housing development and the open countryside.

The site is located in a highly sustainable location. It is within easy walking distance to local centres with a range of facilities provided, as well as having good connections to Doncaster Town Centre.

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 Scawthorpe and the wider district, Doncaster, with economic, environmental and social benefits. It is therefore considered that the proposed development is suitable.
The Council previously identified the site as a proposed housing allocation and concluded that the site was required to meet the housing needs of Doncaster and is a suitable, sustainable site to meet the housing growth of the area. The land at Broad Axe Field serves no Green Belt Purpose.

The Council have accepted that some Green Belt land will have to be utilised for housing land. This is due to the exceptional circumstances which are the national housing crisis and the requirement to adequately meet the housing needs of the Borough.

The ‘fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.’

The allocation of this site for subsequent residential development will:
• Strengthen the Green Belt boundary in this location by ‘rounding off’ the urban area to create a new Green Belt boundary;
• It will neither encroach in to the open countryside, affect openness nor set a precedence for further incursions in the open countryside;
• Its development would not have any significant impact on the openness of the wider Green Belt.

The site does not achieve any of the five purposes for including land in the Green Belt:
• The site at present does not check unrestricted sprawl of large built-up areas;
• It does not prevent neighbouring towns from merging;
• It does not assist in safeguarding the countryside from encroachment;
• The current site does not preserve the setting or special character of a historic town;
• The site does not assist in urban regeneration.

The site is currently in agricultural use and as such does not provide any opportunities for access to the open countryside or for outdoor sport or recreation. The site does not have any particular landscape benefit or secure any significant natural conservation interests.

The site is predominantly Grade 3b agricultural land and hence does not constitute the best and most versatile farm land. In addition, the site does not have any role in improving damaged and derelict buildings or structures worthy of retention.

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 area of Green Belt the Broad Axe Field site is within does not stop the coalescence of neighbouring towns, encroach on the countryside nor affect the setting and special character of a historic town and as such serves no Green Belt purpose. Therefore, a change in the Green Belt boundary, particularly given the unmet housing need, would be appropriate and would not undermine its principle purpose.

The new Green Belt boundary, follows an existing hedge line along the north western boundary of the site. This forms a suitable Green Belt boundary for the coming plan period.

The removal of this site from the Green Belt at this time would be appropriate and would not undermine any of the key objectives and aims of Green Belt policy.
View from the Roman Ridge across towards homes accessed from Green Lane

View along northern boundary of the site towards adjacent housing

View from Roman Ridge towards York Road and the rear of properties on Stanley Road

View across the site to the local feature of the water tower

Housing on Stanley Road which backs onto the site

View over hedge from York Road

York Road looking north

Housing on The Sycamores
Site Issues and Opportunities Plan

KEY:
- Opportunity for Vehicular Access
- Cycle Route
- Opportunity for connection to Public Right of Way
- Closest Existing Bus Stops
- Desirable views from site
- Hedge
- Sewer Route

FILE REF: FIGURE No: REV: TITLE: APPENDIX H
ITY15314 Y:\PROJECTS\15314ITY Broad Axe Farm, Doncaster\Tech\Acad\i-Transport Drawings\Working Drawings\FIG\Potential Site Access.dwg

BROAD AXE FARM, DONCASTER
STRATA HOMES
POTENTIAL SITE ACCESS
Tel: 0113 357 1360
www.i-transport.co.uk
Park House, Park Square West
Leeds, LS1 2PW

SCALE BAR @ 1:1000
INSET SCALE @ A3 1:10,000

Roman Ridge
Green Lane
A638 York Road
Green Lane
Don Valley Academy
Stanley Road
Jossey Lane
Rosedale Primary School

30m AOD
35m AOD
25m AOD
20m AOD

Broad Axe Field, Doncaster - Delivery Statement
Spawforths, Oct 2019 on behalf of Strata Homes
P0-MP-SFA-RP-PIQ232-0101-0001
Achievable: Issues and Opportunities

The total site is approximately 21ha located to the north of Doncaster. The site is bounded by the A638 on the eastern side, the Roman Ridge on the western side and a hedgerow on the northern boundary. Existing development bounds the site on all but the northern sides.

Topography

The topography is relatively level however there is a gentle slope down from the north-western corner to the south eastern corner.

Access

There is opportunity for the site to be accessed by foot and cycle from the Roman Ridge as well as from York Road.

York Road creates the opportunity for vehicular access. It is proposed to provide a signalised highway junction to allow access from this road.

Ecology

The trees and hedges around the edge of the site create the greatest opportunity for ecology. However, the majority of the site lacks significant ecological value due to the nature of the agriculture which currently takes place in the field.

The development of the site creates opportunity to provide improved habitat on site.

Transport

The site benefits from frequent and regular bus services along York Road from the Park and Ride (in the north) to the Town Centre (in the south).

Ground Conditions

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

Drainage

Connections to the local surface water sewer system along with attenuation will be the most appropriate solution for the site.

A foul sewer and two surface water sewers run across the edges of the site.

Utilities

A number of utilities run along the eastern edge of the site. This creates opportunities for connections. Some of these utilities may require diversion to create the access, this is not considered to negatively affect the viability of the site.

Heritage

The Roman Ridge Road is a Scheduled Monument. The development will seek to create an off-set from this road in order to minimise the impact on the monument.
Archaeological and Cultural Heritage Plan

Broad Axe Field, Doncaster - Delivery Statement
Spawforths, Oct 2019 on behalf of Strata Homes
P0-MP-SPA-RP-P4232-0101-0001
Achievable: Archaeology

SKM Enviros were appointed by Strata to undertake an archaeological desk-based assessment of the Broad Axe Field Site. A series of recommendations have been provided to mitigate the impacts of the proposed development upon the sites’ archaeological assets. This has allowed a scheme to be developed which is sensitive to and protects the assets of the site.

It is important to note that the land is in agricultural use and has been for a long time. It is therefore possible that any potential archaeological assets on site may have been destroyed or damaged by ploughing.

This desk-based assessment has established archaeological and historical features. The majority of the features date to the prehistoric, Iron Age and Romano-British periods. Within the site there is a recorded enclosure (possibly Iron Age or Romano-British), identified through cropmark evidence, and the western boundary is formed by the Roman Ridge Roman Road. Sections of the Roman Ridge Roman Road and associated agger (which is an earthwork embankment on which Roman roads were built) survive along the western boundary of the site.

A series of recommendations have been incorporated within the masterplan to avoid impacts on heritage features including a buffer provided between the Roman Road and the built environment.

Consultation with Doncaster Metropolitan Borough Council (DMBC), English Heritage and South Yorkshire Archaeology Service (SYAS) will be undertaken to ensure sympathetic design and appropriate mitigation measures are undertaken to minimise the indirect effects of the development upon the Scheduled Monument (Roman Ridge Roman Road).

The Masterplan proposals will be tailored to minimise any indirect impacts there may be on the surrounding archaeology and cultural heritage resources identified in this assessment.

The site can be developed for housing whilst responding appropriately to the archaeological assets which are present on and around the site.
Achievable: Flood Risk and Drainage

Walker Ingram Associates prepared a flood risk and drainage assessment of the land at Broad Axe Field. The site falls within Flood Zone 1 and the sequential test is satisfied. The proposed development can satisfy the requirements of the National Planning Policy Framework and the Planning Practice Guidance in relation to Flood Risk.

Surface water run-off discharges into an existing watercourse located along the western site boundary. The watercourse is un-named and follows the full extent of the western boundary. The watercourse flows in a south-easterly direction and is likely to become culverted at the boundary extents.

The nearest river is the River Don, located approximately 2.4km in a south easterly direction.

The Environment Agency flood map for planning shows that the site is located within Flood Zone 1 and the site, therefore, has a low risk of fluvial flooding. The proposed development is shown to be within a very low risk area for surface water flooding, with no flow routes from third party land affecting the site.

There are a number of surface water and foul sewers crossing the site. Easements to these should be accommodated within proposals or the routes diverted, if practicable.

Foul water for the development will discharge to the public foul sewer network. Subject to the submission of a Formal Planning Application Yorkshire Water will carry out a feasibility study to determine suitable foul connection points, any available capacity in the public sewer network, together with timescales for any potential upgrading works.

In respect of surface water, consideration should firstly be given to discharge to soakaways, infiltration and watercourse, in that priority order, before connection to sewer will be considered.

It is understood that there are watercourses located through the eastern part of the site. This appears to be the obvious place for surface water disposal, if drainage through soakaway is not feasible.

On site surface water attenuation shall be incorporated into the design to accommodate all storms up to the 1 in 100 year plus 30% climate change storm duration. A 10% increase in impermeable areas shall be utilised to accommodate urban creep.

No special mitigation measures are required for emergency egress during times of flood.

The proposed development can satisfy the requirements of the National Planning Policy Framework and the Planning Practice Guidance in relation to flood risk.
Achievable: Ground

Lithos were commissioned by Strata Homes to carry out a preliminary investigation of land at Broad Axe Field, Doncaster. The site is considered to be suitable for its proposed use for residential development.

An inspection of historical and geological maps and information has been carried out by Lithos. The site appears to have been in its current use since 1851 or earlier, there have been no significant changes to the use of the land over the period from 1851 until present day.

The site is not believed to be affected by sources of hazardous gas generation nor located in an area considered susceptible to mines gas emissions. It is not underlain by a significant thickness of made ground. It is not underlain by peat or shallow chalk deposits.

The site lies in an area where 3% to 5% of homes are estimated to be above the action level. Therefore basic measures are required for new homes. In accordance with building regulations, basic radon measures simply comprise a barrier (membrane laid within the floor construction, which is linked to a damp-proof course (DPC) within the walls of the building.

The site is underlain by limestone bedrock. The British Geological Survey report suggests that there are no significant natural geological hazards on this site. Therefore no action is required in relation to natural ground stability.

The published geological data suggests that the site is underlain at shallow depth by the Brotherton Formation Limestone; likely completely weathered to a clayey gravel (Residual Soil) near surface. Shallow Residual Soils should provide sufficient bearing capacity to enable the adoption of strip footings two storey housing. It is unlikely that significant abnormal foundations will be necessary.

Given the relatively level nature of the site, there should be no requirement for retaining walls, underbuild, tanking etc. Natural soils underlyng this site should yield a CBR of at least 3%. This value should be verified prior to or during construction.

Achievable: Utilities

TDS (Northern) Ltd were appointed by Strata Homes to identify the impact of the proposed development site on existing utility infrastructure. The development site can be adequately served by existing services in the locality.

There is a gas network within the vicinity of the site. This is located within the existing residential development to the south of the proposed site. There is also a small section of infrastructure to the west, within Layden Drive. This is to the south of the proposed development on the opposite side of the Roman Road. It is not expected that any of these assets will be affected by the development proposals.

Yorkshire Water indicate two sections of above 4 inch mains apparatus within the site side verge/carriageway of the A638 York Road. Two legs of private mains are then shown crossing the road and supplying the secondary school in this area. It is anticipated that the distribution main will require lowering to facilitate the works. The costs of this diversion is not expected to be prohibitive to the development of the site.

Several Telecoms companies have infrastructure located within the vicinity of the site including Virgin Media, Zayo Group, City Fibre and BT Openreach. BT Openreach and Zayo Group indicate an underground network and associated joint boxes within the site side verge of the A638 York Road to the east of the site. These assets will have to be lowered or diverted to enable the site accesses to be formulated. The costs associated with this work will not prohibit development of the site.

There is a mobile phone mast to the north east of the site within the parcel of land between Green Lane and the Great North Road.

There is an 11kV overhead line and associated wooden poles routed along the south western site boundary. In addition, Low voltage mains apparatus is shown routed within the site side verge of York Road. It is anticipated that the infrastructure will need to be diverted to facilitate the proposed new site entrance. The costs associated with this work will not prohibit the development of the site.

There are points of connection for all of the major utilities suppliers in the locality.
Extended Phase 1 Habitat Plan
Achievable: Ecology

Brooks Ecological were appointed by Strata Homes to provide a report to inform them of the potential ecological constraints associated with the proposed development site. The site is largely made up of arable land of minimal ecological value and not considered a constraint to development.

The site does not occupy any key locations within any landscape scale wildlife corridors. The well-established hedgerows surrounding the site, connected to adjacent hedgerows will help to facilitate wildlife movements however ultimately the site is flanked by development on three sides limiting its value as a corridor.

There are no internationally designated sites within 10km or nationally designated sites within 2km. The site lies within the IRZ for Sprotbrough Gorge Site of Special Scientific Interest (SSSI), but is unlikely to fall into one of the highlighted categories which requires consultation between the Local Planning Authority (LPA) and Natural England (NE), these being aviation or livestock related.

The site is currently in use as an arable field, with well maintained hedgerows. Most of the site comprises disturbed soil with minimal boundary vegetation.

The vast majority of the site is of very limited ecological value. The hedgerows and trees present on site are of some value to local ecology. The most important of these is the hedgerow which runs along the Roman Ridge.

Due to the lack of nearby ponds and lack of connectivity to the locations of records of Great Crested Newts, a likely absence of GCN from the site has been concluded.

With regards to Bats, a total of 35 records have been returned for the area. None of the records are from within the site.

Trees on or immediately adjacent to site did not appear to support features suitable for roosting bats with only occasional broken branches noted. These trees do not offer crevices suited to roosting. The hedgerows and trees of the site may be used to a limited extent for foraging and commuting purposes but are unlikely to be of any higher value to this group.

Habitats on site will support a typical assemblage of common garden birds during the main nesting season. Given the site’s current land use, relatively disturbed location with poor site lines and simple habitats present, full Breeding Bird Surveys are not considered necessary.

No records of badger have been returned for the area and no evidence of this species was noted. The site presents habitat of limited value to this species and given a lack of recorded evidence; a likely absence of this species has been concluded.

The site is mostly of minimal value to reptiles. The boundaries may offer some suitable habitat however given the lack of adjacent higher value habitat and adjacent development this is still of limited value to this group.

Suitable standard precautions should be put in place to ensure Hedgehogs are not impacted by the proposals.

This site appears largely unconstrained by ecology and biodiversity issues.
Potential Highways Access
Achievable: Highways

i-Transport has been appointed to conduct a transport appraisal of the potential development opportunity at Broad Axe Field. The site is accessible and in a sustainable location; satisfactory access can be provided; and off-site traffic impacts will not be severe. Thus the development accords fully with the transport ‘tests’ of the NPPF and is suitable for allocation.

The main highways access will be provided off York Road. If necessary, an additional emergency or secondary access could also be provided off York Road.

The design and layout of transport corridors within the site and the connections off it will focus on creating places and high quality connections between the residential dwellings on the site and key destinations off it. Street and place design will start with pedestrians and cyclists having priority with managed car access.

The site is close to many local facilities and services and follows the ‘Walkable Neighbourhood’ principles – there are a range of facilities within walking distance of the proposed residential area which residents could access comfortably on foot.

The sites lies immediately adjacent to the existing built development within Scawthorpe and Scawsby thus affording the opportunity to make direct and high quality connections. The adjacent streets, including York Road, have footways and the site can connect to these. A cycle lane runs along the site frontage and cyclists can use the bus lane on the southbound carriageway of York Road.

The accessibility of the site and proximity to many every-day facilities with the short-distances involved affords a real opportunity to focus movement on slow and active modes of travel and thereby reduce car use.

Preliminary capacity analysis set out below identifies that the site can be accessed by a single junction with this able to accommodate the generated traffic flows. A loop road will be provided within the site. Given the significant length of frontage available, an additional emergency or secondary access could be provided off York Road with its location determined through detailed masterplanning.

Taking account of the above and other constraints, it is proposed that the site access to Broad Axe Field should take the form of a traffic signal controlled junction.

A range of facilities and services will be available locally within walking or cycling distance of the site. These include several primary schools, two secondary schools, health facilities including doctors, dentist and pharmacies and a range of shops and leisure facilities. The site is well connected to Doncaster town centre via frequent bus routes that run along the site frontage and a cycle route. It is therefore concluded that the site is sustainable and accessible by a range of travel modes.

Satisfactory access can be provided from the York Road frontage and an indicative access design has been produced with capacity assessments demonstrating it will operate satisfactorily.

The traffic flows generated by the site will be spread around the adjoining highway network and, as well as being within typical daily variations, are not anticipated to result in adverse impacts on road safety or severe traffic impacts.

Overall, it is therefore concluded that the proposals accord with the transport aspects of the Framework and Local Policy and that the site is suitable for allocation in the Council’s emerging Local Plan.
Deliverable

The land at Broad Axe Field is deliverable in accordance with national policy. It is available, suitable and achievable (viable and deliverable). The land is in a sustainable location for a residential development. The land is controlled by and will be developed by Strata Homes.

Available

Strata Homes control the site at Broad Axe Field and have unencumbered access to it. The site is therefore available in accordance with national guidance.

Suitable

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

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

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

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

Achievable

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

The indicative masterplan shows how a mix of housing can be accommodated within the site, alongside connectivity, landscaping and drainage features. The site is controlled by a house builder and therefore can be considered achievable.

Viability

Strata Homes has commissioned and undertaken a range of technical assessments and further work is ongoing. The current proportionate information available for the site has informed an appraisal which demonstrates that the proposed scheme is viable and creates a positive land value and developer profit. The proposed scheme therefore fully accords with the Framework.

Summary

The site at Broad Axe Field provides a development opportunity that is available, suitable and achievable and therefore it is considered that the site is deliverable, in accordance with national planning policy and guidance. It is promoted by Strata Homes and will be developed by them also. It is deliverable within the plan period.
Illustrative Masterplan

Broad Axe Field, Doncaster - Delivery Statement
Spawforths, Oct 2019 on behalf of Strata Homes
PG-MP-SFA-RP-PK212-0101-0001
There is a need for Doncaster Council to review their Green Belt boundaries to meet housing need and demand in the area. This advocacy supports the allocation of the site and agrees and considers that there are exceptional circumstances supporting the release of the site from the Green Belt due to the need to meet Doncaster’s housing need and ambitions for growth.

Strata Homes are a local business, promoting the site for inclusion in the Local Plan. The site is therefore available for residential development within the Plan period. The site is in a suitable and sustainable location, close to a range of facilities and services and public transport routes and is suitable for residential development on the edge of the urban area.

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

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

The development will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex but having the right quantity, quality, and balance of housing in an area is necessary for economic growth. The development of the Broad Axe Field scheme can support local economic growth through both direct job growth through the construction phase but also through increased population which will create sustainable local jobs from the increased demand for goods and services. This provides important sustainable development in the Borough but importantly support the long term vitality of Doncaster.
Key Benefits

- Optimum location to assist in the continued growth of the Doncaster Main Urban Area
- The delivery of circa 500 new homes in a range of house types, sizes and tenure
- Circa 1,750 new jobs (direct and in-direct) from the construction of the residential scheme alone
- Gross Value Added of around £35.61 million
- Circa £12.38 million Annual Household Expenditure
- At least £2.5 million of first occupation expenditure
## Appendix 2: 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></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td><strong>960</strong></td>
<td>13</td>
<td>No sign of start, permission has lapsed. <strong>Discount from supply</strong></td>
</tr>
<tr>
<td><strong>856</strong></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><strong>951</strong></td>
<td>28</td>
<td>No start recorded, permission expired in 18/19. <strong>Discount from supply.</strong></td>
</tr>
<tr>
<td><strong>958</strong></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><strong>569</strong></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><strong>628</strong></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><strong>955</strong></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><strong>956</strong></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><strong>1076</strong></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><strong>524</strong></td>
<td></td>
</tr>
</tbody>
</table>