

Doncaster Metropolitan Borough
Council

**Reviewing the Success of the
Countryside Protection Policy
Area**

Technical Supporting Note to
Doncaster Green Belt Review

Issue | 10 December 2015

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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1 Introduction

1.1 Overview

Ove Arup and Partners Limited ('Arup') were commissioned in Autumn 2015 by Doncaster Metropolitan Borough Council ('Doncaster MBC') to undertake a review of the Green Belt within the Local Authority area.

Doncaster MBC are currently preparing a Local Plan which will replace the adopted Unitary Development Plan and Local Development Framework (adopted Core Strategy). The new Local Plan is in the early stages of production with an *Issues and Options Consultation* undertaken during summer 2015. The consultation requested views on three different options on the distribution of development. Whilst all options prioritise Doncaster, as the main urban area, with the greatest proportion of the housing requirement, there is recognition that options may result in the release of Green Belt land for development or as safeguarded land.

1.2 Purpose of this Technical Supporting Note

The Outer Boundary of the Green Belt within Doncaster is currently defined by the East Coast Main Line; a boundary which has remained since the adoption of the South Yorkshire Structure Plan in 1979. There has been historic debate at subsequent Plan reviews about whether the designation should be extended eastwards, including to the eastern Doncaster Local Authority Boundary. The land to the east of the Green Belt is currently designated as Countryside and development has been limited by a succession of Countryside Protection Policies.

Paragraph 83 of the National Planning Policy Framework stipulates that 'once established, Green Belt boundaries should only be altered in exceptional circumstances and through the preparation of review of the Local Plan'. Through the production of the new Local Plan, it is prudent that Doncaster MBC consider the success of the countryside policy, and whether there would be an 'exceptional circumstances' case for extending the Green Belt.

Therefore, this Technical Note reviews how the Countryside Protection Policy Area has performed in protecting the countryside to the east of Doncaster from inappropriate development, if its performance could be further strengthened or supported by other development management policies, or (if there are no appropriate alternatives) considers whether there is sufficient justification to extend the Green Belt.

1.3 Structure

The structure of this Note is as follows:

- Review of the use and success of the Countryside Policy in Doncaster;
- Review of history of the Green Belt around Doncaster and previous challenges to the existing Green Belt Boundary;

- Review of Best Practice Guidance and comparative examples for extending the Green Belt Designation;
- Recommendations for protecting Doncaster's Countryside from inappropriate development in the future;
- Consider 'exceptional circumstances' for change.

2 Performance of the Countryside Policy in Doncaster

2.1 Overview

To determine whether there are ‘exceptional circumstances’ for extending the Green Belt further east, it is necessary to first analyse the success of the Countryside Protection Policy Area designation and policy in protecting the countryside from inappropriate development. The following chapter sets out the national and local policy context for protection of the countryside, followed by a review of recently appealed development and approved major development within the Countryside Area.

2.2 National Planning Policy Context

The National Planning Policy Framework (2012) confirms that the planning system should ‘contribute to and enhance the natural local environment by protecting and enhancing valued landscapes’ (paragraph 109) and recognise the ‘intrinsic character and beauty of the countryside’ (paragraph 17), but offers little guidance on policies to restrict development within the countryside. The NPPF does however set out how planning policies should encourage effective use of land by re-using land that has been previously developed which is not of high environmental value (Paragraph 111) and policies which take into account the economic and other benefits of the best and most versatile agricultural land (Paragraph 112).

Similarly, the Planning Practice Guidance offers limited additional advice on methods to protect the countryside. Paragraph 1 of the Natural Environment chapter, does however state that ‘*one of the core principles in the National Planning Policy Framework is that planning should recognise the intrinsic character and beauty of the countryside. Local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes but also the wider countryside*’ (Paragraph: 001 Reference ID: 8-001-20140306).

Given the relatively limited reference to ‘Countryside’ or ‘Rural Protection’ within current national policy guidance, it is prudent to analyse the role of the ‘Countryside’ within national guidance at the time of the Unitary Development Plan and Core Strategy Production (which took place pre-2012):

- Planning Practice Guidance 7 (1997) informed the production of the Unitary Development Plan (1998). It stated that the planning system helps to ‘integrate the development necessary to sustain economic and social activity in rural communities with protection of the countryside for the sake of its beauty, the diversity of the landscape and historic character, the wealth of its natural resources and its ecological, agricultural, recreational and agricultural value’.
- Planning Policy Statement 7 (2004) and revisions within the updated Planning Policy Statement 4 (2009), which informed the preparation of DMBC Core

Strategy, stated that there is a need to ‘raise the quality of life and the environment in rural areas by promoting thriving inclusive and locally distinctive rural communities whilst continuing to protect the open countryside for the benefit of all’.

2.3 Local Planning Context

2.3.1 Doncaster Core Strategy

The Doncaster Council Core Strategy, which was adopted in 2012, contained policies to protect and enhance Doncaster’s countryside. Part B of Policy CS3 *Countryside* highlights that the countryside to the east of the Borough will continue to be protected through the **Countryside Protection Policy Area**. The Policy mandates support for minor amendments to settlement boundaries, confinement of urban extension allocations to those necessary to deliver the Growth and Regeneration Strategy and restriction of development proposals to those appropriate in a countryside location. Part C of the Policy stipulates that proposals outside development limits will only be supported where these would protect and enhance the countryside, preserve the openness of the Green Belt and not be visually detrimental.

Policy CS3: Countryside

Doncaster’s countryside will be protected and enhanced, having regard to the principles set out below.

A) The general extent of the Green Belt will be retained (as indicated on the Key Diagram). The key considerations for land within this area are:

1. national policy will be applied, including a presumption against inappropriate development other than in very special circumstances; and;
2. land will only be taken out of the Green Belt for development allocations in exceptional circumstances for example where necessary to sustainably deliver the Growth and Regeneration Strategy.

B) The countryside in the east of the borough will continue to be protected through a Countryside Protection Policy Area (as indicated on the Key Diagram). The key considerations for land within this area are:

1. new urban extension development allocations will be confined to those necessary to deliver the Growth and Regeneration Strategy;
2. minor amendments to settlement boundaries will be supported where existing boundaries are indefensible;
3. proposals will be supported where they would be appropriate to a countryside location and would protect and enhance the countryside for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources and to ensure it may be enjoyed by all; and;
4. proposals that would generally be acceptable include agriculture, forestry, outdoor sport and recreation, habitat creation, flood storage and management, essential infrastructure, mineral extraction, some forms of stand alone renewable energy, suitable farm diversification schemes, limited extension, alteration or replacement of existing dwellings and re-use of suitable buildings for uses appropriate in the countryside.

C) Proposals which are outside development allocations will only be supported where they would:

1. protect and enhance the countryside, including the retention and improvement of key green wedges where areas of countryside fulfil a variety of key functions;
2. not be visually detrimental by reason of siting, materials or design;
3. not create or aggravate highway or amenity problems; and;
4. preserve the openness of the Green Belt and Countryside Protection Policy Area and not conflict with the purposes of including land within them.

D) Although not required to deliver the Growth and Regeneration Strategy set out in Policy CS2, the extent of the Green Belt will be reviewed to inform future versions of the Core Strategy.

The supporting policy explanation indicates that the countryside in the eastern half of Doncaster does not meet the purposes of the South Yorkshire Green Belt but is otherwise just as valuable, which is reflected in the Countryside Protection Policy Area designation.

Figure 1 Core Strategy (adopted 2012) Policy CS3 Insert

2.3.2 ‘Saved Policies’ within the Unitary Development Plan

Until such a time when the emerging Local Plan is adopted, there are a number of policies within the Unitary Development Plan (1998) which remain indefinitely saved.

The UDP supporting text indicates that the countryside has been subject to change. Indeed, it suggests that a lessening emphasis on the importance of agricultural production, pressure from recreational developments and leisure facilities in the countryside and continuing development pressure has resulted in the Countryside Designation within the Borough continuing to perform a balancing act between competing interests.

Detailed development management policies relating to the protection of the countryside have therefore been ‘saved’. A list of saved and replaced policies is set out within Figure 2. Of most relevance is Policy ENV2, which resolves that the Council will maintain a **Countryside Policy Area** in the Eastern part of the Borough. The purposes of the Countryside Policy area are:

- To assist in safeguarding the countryside from encroachment;
- To provide an attractive setting for towns and villages;
- To prevent settlements from coalescing;
- To provide opportunities for outdoor sport and recreation near urban areas;
- To retain land in agriculture, forestry and nature conservation uses;
- To protect other non-renewable resources;
- To assist regeneration by directing development towards urban areas and strategic allocations; and,
- To help sustain rural communities and a diverse rural economy.

Remaining saved policies ENV4 to ENV14 (except ENV9 which was not saved) set out the development control requirements within the Countryside Policy Area. Policies indicate that development will not normally be permitted, for purposes other than: agriculture and forestry, ‘predominantly outdoor’ recreation and leisure uses, infilling development within settlements or washed over villages, conversion or the re-use of existing buildings, small scale extensions of employment uses and minor retail development. Policies also set out guidelines for the development of sites for touring caravans and camping facilities, where these would not create a visual intrusion in the countryside or lead to the physical or visual coalescence of settlements. Finally, saved policy ENV15 states that development proposals on the urban edge, adjacent to the Green Belt or the Countryside Policy area should have regard to their visual impact on the countryside.

UDP Environmental Policies	'Saved Policy' within the UDP (1998)	Replaced by Core Strategy (2012)
SENV1 Protection of the Countryside from inappropriate development		✓ Policy CS3 Countryside
ENV1 Green Belt Designation	✓	
ENV2 Countryside Policy Area Designation	✓	
ENV3 General Development Control Policy: Development in the Green Belt	✓	
ENV4 General Development Control Policy: Development in the Countryside	✓	
ENV5: Agricultural Dwellings	✓	
ENV6: Agricultural Buildings	✓	
ENV7: Recreation and Leisure Developments within the Green Belt or Countryside	✓	
ENV8: Sites for Touring Caravans and Camping Facilities	✓	
ENV9 Infill Development within the Green Belt or the Countryside Policy Area		✓ Policy not saved
ENV10 Conversion of Existing Buildings	✓	
ENV11 Extension or Expansion of an existing source of employment	✓	
ENV12 Retail Development within the Countryside	✓	
ENV13 Replacement Dwellings within the Green Belt or Countryside Policy Area	✓	
ENV14 Extensions and Alterations to Dwellings within the Green Belt or Countryside Policy Area.	✓	
ENV15 Development Proposals on the Urban Edge		✓ Policy CS16 Valuing Our Natural Environment

Figure 2 List of Saved and Replaced UDP policies

In summary, these saved policies seek to limit the types of uses considered appropriate in the countryside, minimise the scale of any potential development and reduce the impact of potential development on the character of the countryside.

2.4 Review of the Success of Countryside Protection Policy Area

The historic national and local policy for the Countryside Area sought to limit the amount, scale, impact and types of uses permissible in the countryside. In order to determine if the policies had a degree of success, this note examines: applications

for development in the Countryside awarded on appeal and major applications granted planning permission between 1st May 2012 and October 2015.

2.4.1 Evaluating Recent Planning Appeals

This section provides an analysis of applications for housing and employment development within the Countryside Protection Policy Area which were appealed, between October 2010 and October 2015. The analysis did not consider applications which were determined at appeal for less than 5 dwellings. The data was sourced using the Planning Inspectorate search of completed appeals¹.

Table 1 Outcomes of recent appeal cases within the Countryside

Appeal Reference and Details	Description of Appeal	Commentary of Role of Countryside Protection Policy Area
Reference: 10/01725/OUTM Date of Decision: 6 December 2012 Outcome: Permission refused, appeal dismissed.	Land East of Hatfield Lane, Armthorpe: Appealed refusal of an application for residential and commercial/employment development (B1, B2 and B8).	The impact of the development on the countryside, alongside the character and appearance of the development, were two of the main concerns expressed by the Inspector. Secretary of State considered that the appeal proposals would conflict with policies CS3 'Countryside' and Policy ENV4 'Development within the Countryside'. The Inspector concluded that the appeal proposals would extend urban development and result in a reduction in openness. However proposals would relate well to the existing urban form, and therefore the Secretary of State considered that the development is 'premature'
	Role of the Countryside Protection Policy	Successful in preventing inappropriate development in the Countryside.
Reference: APP/F4410/A/ 11/2160658 Date of Decision: 25 January 2012 Outcome: Permission granted, appeal allowed.	Whiphill Lane, Armthorpe, Doncaster: Appeal the refusal of an application for 8 No. detached dwellings with 200% parking provision.	The site exists between existing built form and consent for the West Moor Employment Park. The Key Diagram of the Doncaster Core Strategy indicates an urban extension between Armthorpe and the M18 as a Strategic Distribution Employment Location. The emerging policy position and the outline planning permission, indicate clearly that the area between the existing urban edge of this part of Armthorpe and the M18 Motorway would not be retained as open countryside. Development would also therefore not represent an extension to the existing built-up area of Armthorpe, and therefore would not intrude or visually encroach upon the open countryside beyond the urban edge of Armthorpe. The Secretary of State therefore considered that, whilst the proposal is sited in open countryside, the site forms part of a larger development area than the evolving Core Strategy.
	Role of the Countryside Protection Policy	Unsuccessful in preventing development in the Countryside, however site was identified as part of a larger emerging allocation and would

¹ This analysis therefore does not include appeals in progress in October 2015.

		therefore not lead to the loss of open countryside.
Reference: APP/F4410/A/ 14/2214370 Date of Decision: 7 th August 2014 Outcome: Permission Refused, Appeal dismissed	Rimmington Farm, Low Levels Bank, Hatfield, Doncaster: Appeal the refusal of a calf-rearing unit and log cabin for temporary use as farm manager's accommodation.	The proposal would entail the construction of an open sided, steel framed calf-rearing unit within the farm area. Rimmington Farm is a strip of open flat land amongst the fen-like levels to the north east of Doncaster. Doncaster MBC are concerned that the erection of a log cabin for temporary use as a farm manager's dwelling would be contrary to policy ENV5 of the UDP, which seeks to prevent isolated dwellings in the countryside unless required for an agricultural worker needing to live nearby. The Inspector concluded that there were no special circumstances to warrant a new isolated dwelling in the countryside here and the proposal would be contrary to the requirements of policies ENV5 and ENV2 of the UDP.
	Role of the Countryside Protection Policy	Successful in preventing inappropriate development in the countryside.

Analysis of recently appealed decisions for larger employment and residential development indicates that, firstly, there have been relatively few appeal cases within the past five years and, secondly, the strength of the existing Countryside Policy has been recognised across all. Whilst the second appeal was allowed, this was as a result of emerging policy objectives for the area, and not wholly based on the strength of the Countryside Designation.

In addition to Housing and Employment development, there have also been applications for Gypsy and Traveller Accommodation in the countryside, which have been determined at appeal. There are different policy parameters for the provision of sites for travellers with guidance on plan-making and decision-taking provided within Planning Policy for Traveller Sites² (August 2015)

Table 2 Appealed Gypsy and Traveller Accommodation Applications

Appeal Reference and Details	Description of Appeal	Commentary of Role of Countryside Protection Policy Area
Reference: APP/F4410/A/ 12/2168993 Date of Decision: 12 September 2013 Outcome: Permission temporarily granted, appeal allowed.	Land to south-east side of Flashley Carr Lane Appeal refusal for 'change of use of land to a gypsy site comprising 10 residential pitches, a transit area for 9 caravans, the erection of 6 amenity blocks and access'.	The appeal site lies within the countryside, however part B of Policy CS3 does not include gypsy sites as a proposal which would generally be acceptable. In combination with Policy CS13 'Gypsies and Travellers', the Inspector identified that whilst the site would dominate the nearest settled community, the site is within open countryside and therefore a location where the development of gypsy and traveller sites should be strictly limited. The Inspector confirmed that the proposed development would cause considerable harm to the character and appearance of the area.

² Department for Communities and Local Government (2015) Planning Policy for Travellers

		On balance, the Inspector considered that the proposal would accord with several wider sustainability considerations and significant weight has been attached to reducing the need for long-distance travelling. The generally need for both permanent and transit accommodation also carries significant weight.
	Role of the Countryside Protection Policy	CS13 permits gypsy and traveller sites within Countryside Policy Area provided they meet the terms of that policy. Whilst the Inspector agreed that the proposed development was not in a sustainable location and so did not meet that aspect of CS13, the needs of the occupants was considered to be more significant. The importance of the Countryside Protection Policy Area is therefore recognised (in both the inspector's report and in his decision to grant only temporary permission). However, on balance, the appeal valued the welfare of the proposed occupants.
Reference: APP/F4410/C/ 15/3002126 Date of Decision: 28 April 2015 Outcome: The appeal is dismissed.	Thorninghurst Farm, Sour Lane, Fishlake, Doncaster, South Yorkshire DN8 4JN Appeal for a 'retrospective planning application for siting for mobile park home.'	Thorninghurst Farm is located within flat, open countryside. There is a farmyard with a number of large farm buildings. A bungalow is located next to the farmyard. The mobile home stands slightly separately, a short distance from the bungalow. The inspector raised the issue of the mobile home being prominently located in the countryside landscape and highlighted Policy CS3 which seeks to enhance and protect the countryside, and ENV4 from the Unitary Development Plan, which has similar aims.
	Role of the Countryside Protection Policy	In summary, Policy CS3 and ENV4 performed strongly in the dismissal of a mobile home appeal in the countryside.

In the case of appealed Gypsy and Traveller development within the countryside, the overall identified need and the needs of the individual occupants of the site, and sustainability benefits of not having to travel long distances for facilities, outweighed the impact on the openness of the countryside. It is therefore possible to conclude that, again, the strength of the Countryside Protection Policy Area was not disputed, but other policy and material considerations carried weight.

Conclusion: The Countryside Protection Policy Area covers the eastern area of Doncaster and has a role of safeguarding the countryside from encroachment, protecting an attractive setting for towns and villages and preventing settlements from merging, alongside maintaining support for rural land uses.

Whilst national policy does not explicitly state the role of the Countryside, it does emphasise a 'Brownfield first' rationale. Historically, superseded PPG 7 'Countryside' (1997), which informed the production of Unitary Development Plan, and PPS 7 'Sustainable Development in Rural Areas' (2004), which informed the production of the Core Strategy, focussed on the 'continued protection of open countryside for the benefit of all'. Analysis of recent appeals

cases within the countryside confirms that, to an extent, the Countryside Policy Protection Area has performed relatively strongly against the ‘inappropriate development’. Where in the very limited number of cases in the past 5 years, development has been allowed on appeal, this is generally as a result of meeting the needs of occupants or to align with an emerging policy direction of an area.

2.4.2 Changes within the Countryside

Appendix A sets out recent applications for development within the countryside. Research comprised a review of Major Outline, Major Full and Major Reserved Matters Applications (County, Environmental Assessment, DMBC Reg 3 and Reg 4) between 1st May 2012 and mid-October 2015. It is appropriate to use this date range as the Core Strategy was adopted in May 2012, and therefore these search criteria represent a threshold for when the Countryside Protection Policy Area was ‘refreshed’. Broad conclusions from this analysis confirm the following:

- There are several very large developments that have been consented, or reserved matters approved, within the Countryside in the past three years. Key large developments comprise the FARRRS link road and a number of 100 units or more development schemes.
- Spatially, few developments in the countryside are isolated from the built form. Broad conclusions highlight concentrations of development in the countryside around Auckley and Armthorpe. There were fewer applications surrounding Hatfield and Stainforth.
- Developments within rural, isolated areas of the Countryside are almost exclusively for rural land uses and exceptions set out within the ‘saved policies’ of the UDP. These include extension of the Yorkshire Wildlife Park and an animal rescue facility near Branton.
- Although a number of Decision Notices did not explicitly contain an officer commentary for their rationale to grant permission, development within the Countryside generally focussed on locational advantages and connections to a wider policy drivers (such as the airport). Assessing sites where no reason for the development was offered highlights that sites which were well-contained by the built form or hard infrastructure were generally granted permission.
- Core Strategy Policy CS3 and UDP Policy ENV4 Countryside was used to refuse application which would represent inappropriate development in the Countryside.

This review highlights that DMBC has resolved to grant planning permission for development in the countryside, but the Council has been satisfied by the overriding reasons provided for the development and the location of this development. (see Figure 3).

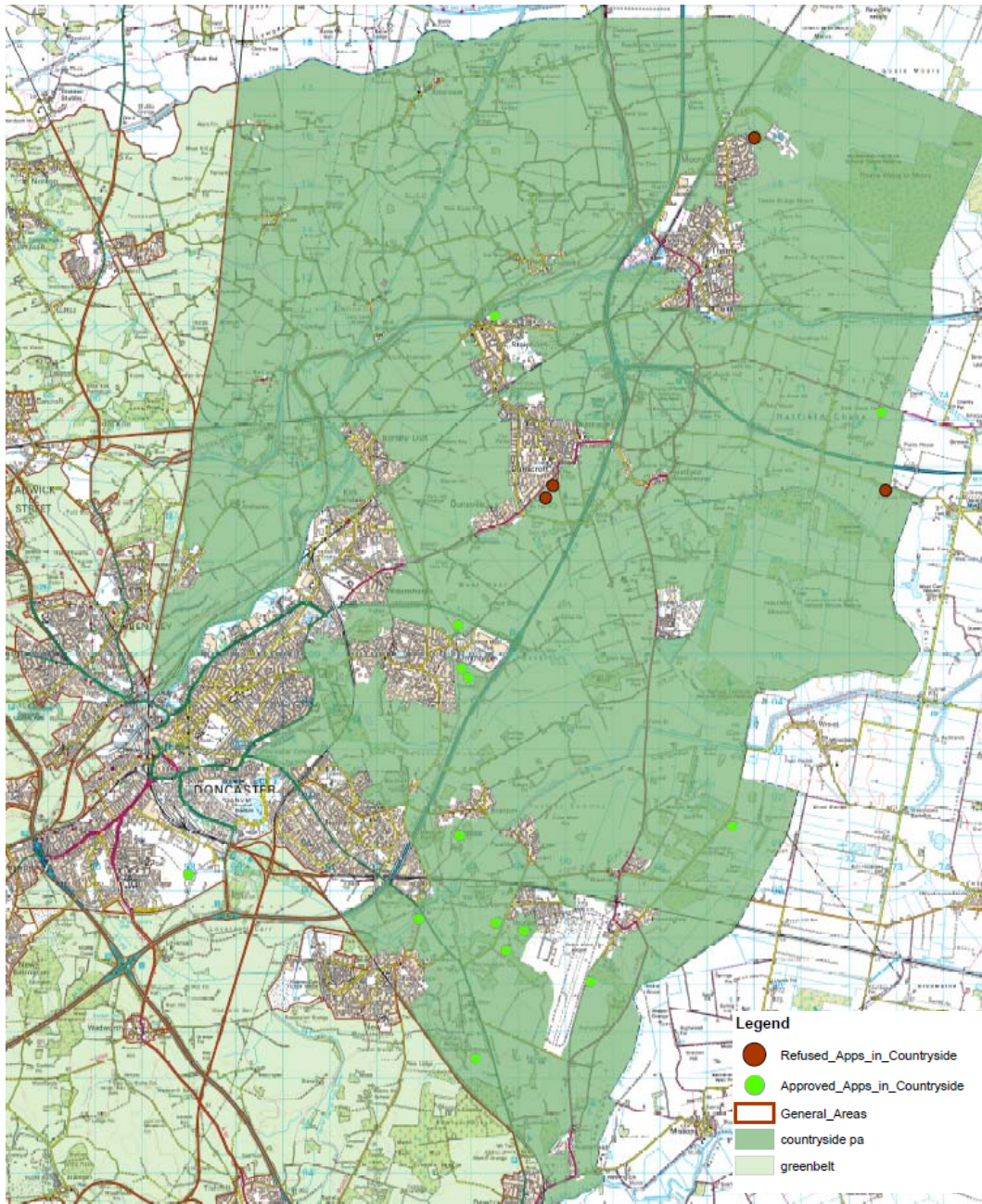


Figure 3 Consented and Refused Major Planning Applications, within the Countryside (2012-2015)

2.4.3 Anticipated Changes to the Countryside

Further to the research undertaken of planning applications within the Countryside, it is pertinent to note anticipated ‘future changes’ to the Countryside which may arise during the next Plan Period. There are two areas in the eastern countryside of the Borough of ‘city region’ significance, where proposals for employment and housing growth are likely to be put forward as part of the plan preparation process. These comprise land around the Robin Hood Airport and the Unity area near Junction 5 of the M18:

- Core Strategy Policy CS6: Robin Hood Airport and Business Park states that growth and investment at Robin Hood Airport will be sported in accordance with certain principles. The airport will become a multi-modal transport interchange, with improved access through the FARRRS link road and railway station, and will be supported by westward expansion of the business park. The Countryside area surrounding the airport is therefore likely to be subject to additional development pressures during the next plan period.
- The area surrounding Junction 5 of the M18 is being promoted by Marcol Waystone as the Unity Masterplan. The Unity/ DN7 initiative was allocated as Policy SP18 within the now-withdrawn Submission Version of the Sites and Policies DPD. In addition, the SCR Strategic Economic Plan (2014) identified DN7 initiative as one of its 7 Growth Areas (for delivery of job and housing growth in the next 10 years). It is a ‘mixed-use growth corridor which will include a cluster of green businesses and hi-tech companies with new direct access to ports and the motorway’. The area is therefore likely to experience additional development pressures during the next Plan Period.

Conclusion: DMBC has permitted development in the Countryside which has demonstrated overriding economic and connectivity benefits to the Borough, or where local need or exceptional circumstances has been demonstrated. Generally, permitted development has been contained to the periphery of settlements or neighbouring areas of growth. It is, however, worth highlighting that development in the general countryside (away from settlement boundaries) has been limited.

Historically, housing development within the countryside has not been permitted, the exception being residential development at Auckley which has enabled the development of FARRRS and therefore concluded by the Council to outweigh potential development plan conflict. Whilst a small number of residential developments have been approved within the countryside within the past year, this can be attributed to the withdrawal of the Sites and Policies Development Plan Document. As an interim position, whilst awaiting the progression of the Local Plan, the Settlement Hierarchy as defined by the adopted Core Strategy is a material consideration in decision making for applications in the Countryside Policy Area.

Looking forward, there are two areas in the countryside, which will have jobs and economic growth potential, which the Local Plan preparation process will need to consider together with protecting the countryside.

3 History of the Green Belt within Doncaster

3.1 Overview

As set out in the introduction, the performance of the Countryside Protection Policy Area cannot be considered purely in isolation from historic arguments for extending the Green Belt further east. This section therefore examines the original role of the South Yorkshire Green Belt and the wider case for extending the designation.

3.2 Original Designation of Green Belt

Role of the Green Belt within National Policy

Paragraph 80 of the National Planning Policy Framework sets out the role and fundamental purpose of the Green Belt in England, as being ‘to prevent urban sprawl by keeping land permanently open’ with the essential characteristics of Green Belts being their ‘openness and permanence’. This Paragraph also sets out the five national purposes of the Green Belt:

- *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 specialist character of historic towns; and*
- *To assist in urban regeneration by encouraging the recycling of derelict and other urban land.*

The NPPF endorses the permanence of Green Belts as an essential characteristic (paragraph 79) and stipulates that ‘once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan’ (paragraph 83).

In addition, Paragraph 82 states that ‘new Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.’ (Paragraph 82).

Original Designation of Doncaster Green Belt

The Green Belt was established for the first time through the West Riding County Development Plan First Review (1966) and associated Town Maps. The Review set out the extent of the Green Belt in broad terms; the designation covered the countryside in the west of the Borough extending eastwards as far as the A1 (M) and a small distance beyond (near Bughwallis and Campsall) where the minerals railway line was used.

Although the West Riding County Development Plan First Review (1966) is no longer available in written or digital form, the original Purpose of the Green Belt centres on preventing the coalescence of settlements within South Yorkshire. Supporting Text (Paragraph 5.15) within the Doncaster MBC Unitary

Development Plan (1998) set out that the land to the west of the Doncaster is sandwiched between the adjacent urban centres of Wakefield, Barnsley, Rotherham and Doncaster and is therefore particularly sensitive to urban expansion and settlement coalescence. Indeed, the Inspectors Report³ supporting the Core Strategy echoes the RSS purpose, which states, ‘the South Yorkshire Green Belt serves to prevent the merging of the large urban areas of Doncaster, Rotherham, Sheffield, Barnsley and Wakefield’ (Paragraph 33).

3.3 Local History of Green Belt Change

Following the original designation of the Green Belt within the West Riding County Development Plan First Review (1966), there has been considerably limited change to the overall spatial extent and nature of the Green Belt. The following sets out the historic changes to the Green Belt boundary, categorised into strategic changes and localised amendments to the boundary:

Strategic Changes to the Green Belt Boundary

- **South Yorkshire Structure Plan (1979)** formalised the general extent of the Green Belt within Doncaster, and extended the outer boundary from the A1(M) to the East Coast Mainline. This Plan resulted in arguably the most substantial change in the Green Belt in the history of the designation.
- **Local Plans and Interim Policy Statements:** Following the adoption of the Structure Plan, statutorily-defined detailed Green Belt boundaries were confirmed through the Mexborough and Conisbrough District Plan (adopted 1982), Adwick/ Bentley and Sprotbrough Local Plan (adopted 1989) and Balby/ Hexthorpe Local Plan (adopted 1989). Interim Policy Statements were prepared for those areas not covered by the detailed Local Plans.

Localised Reviews of the Green Belt Boundary

- The **Doncaster Unitary Development Plan** (July 1998) established for the first time a detailed statutory boundary for all Green Belt within the Borough. Statutory boundaries were defended by a line approximating to that of the East Coast Main Line and detailed boundaries. Where detailed statutory Green Belt Boundaries were defined for the first time, the Borough Council had regard to development requirements, environmental and other planning considerations and was satisfied that development allocations were made and boundaries drawn which obviated the need for Green Belt boundary review for as far as envisaged.
- Although partially revoked in 2013, the **Regional Spatial Strategy for Yorkshire and Humber (2008)** stated that the Green Belts in South Yorkshire have a valuable role in supporting urban renaissance, transformation and concentration as well as conserving the countryside. The General Extent of the designation should not be changed, however localised

³ Doncaster Metropolitan Borough Council Core Strategy 2011-2026 DPD, Inspector’s Report March 2012

reviews may be necessary in some places to deliver the overall premise of the Strategy.

- The **Core Strategy (2012)** highlights that the general extent of the Green Belt will be retained. Policy CS3 states that although amendments to the Green Belt are not necessary to deliver the Growth and Regeneration Strategy, the extent of the Green Belt may need to be reviewed to inform the future versions of the Core Strategy.

Through the production of the emerging Local Plan, there is a recognition that options may result in the release of Green Belt land for development or as safeguarded land. This is likely to result in changes to the internal Green Belt boundary; the extent of these changes will evolve through the Local Plan process.

3.4 Previous Challenges to the Green Belt Boundary

Debate relating to extension of the Green Belt was most apparent during the preparation and adoption of the South Yorkshire Structure Plan (1979) and the UDP (1998). Subsequent Development Plans have reiterated the importance of the Countryside, but have continued to determine that the ‘designation’ does not replicate the role of the South Yorkshire Green Belt.

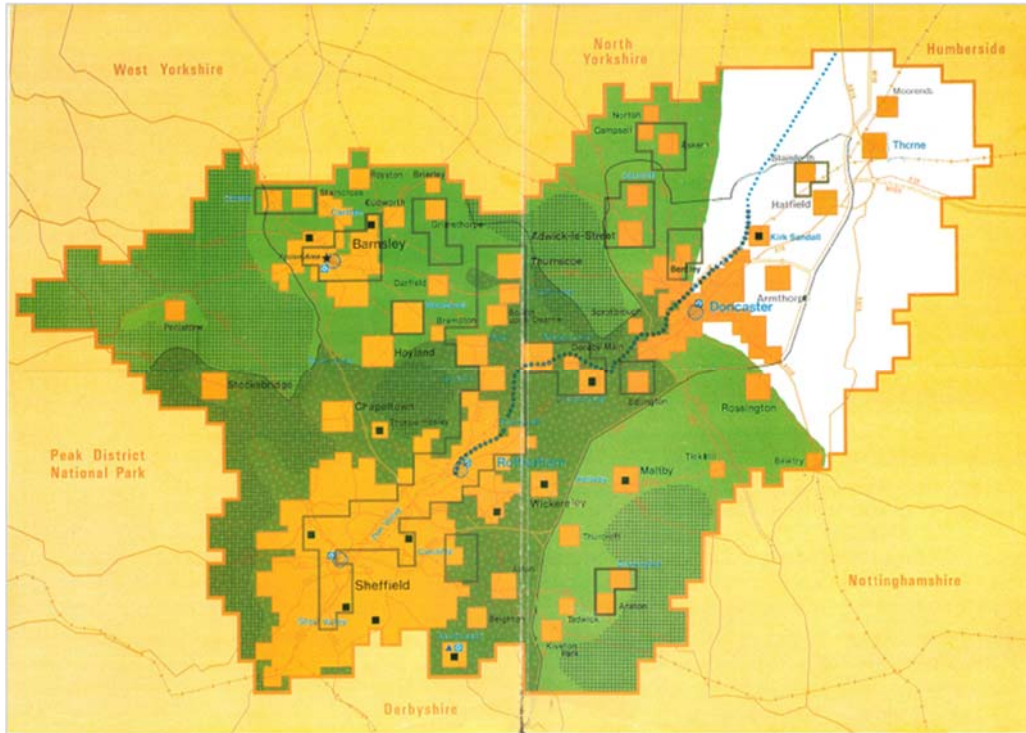
South Yorkshire Structure Plan Examination (adopted 1979)

During the examination of the Green Belt, North Yorkshire County Council sought to extend the existing Green Belt in the County to the County Planning Authority’s boundaries, which were broadly to the east of the existing Selby-Doncaster-Retford Railway. In summary, the Secretary of State considered that the proposal to extend the designation to the east would represent:

- A restriction of new industrial development, and designation would tend to work against the high priority which the Government has given to encouraging such development.
- Indiscriminate application of the Green Belt designation. Green Belt should not be used where other means of development control in rural areas would more appropriately serve the required purpose.
- The Inspector considered that the South Yorkshire Green Belt, as defined below, will stand on its own and that its approval will not therefore prejudice considerations of proposals by neighbours.

The Secretary of State therefore modified the proposed policy to include only those areas where it is necessary to regulate the growth of existing built-up areas and to preserve easy access to open countryside.

Figure 4 South Yorkshire Structure Plan Key Diagram.



Doncaster Unitary Development Plan (adopted July 1998)

The Doncaster Unitary Development Plan (July 1998) proposed no change to the General Extent of the Green Belt. Whilst this decision was based in part on a lack of exceptional circumstances to justify change, it was also based on the inability of the countryside to the east of the Borough in meeting the purposes of the Green Belt. The supporting text stated:

- The countryside in the eastern half of the Borough is considered less appropriate for Green Belt designation than that in the west, which is sandwiched between the adjacent urban centres of Wakefield, Barnsley, Rotherham and Doncaster and is therefore particularly sensitive to urban expansion and settlement coalescence’.
- The countryside in the eastern half of the Borough is in a number of ways more suitable for planned urban expansion than that in the west being generally of a lower landscape and agricultural quality.

Conclusions: The original designation of the South Yorkshire Green Belt was to prevent the merging of the large urban areas of Doncaster, Rotherham, Sheffield, Barnsley and Wakefield. Its current role furthers this original designation and serves to meet the five purposes set out within the National Planning Policy Framework.

Both the Structure Plan and Unitary Development Plan received representations which sought to extend the Green Belt Boundary further east within Doncaster. Doncaster MBC successfully rebutted these representations by arguing that the eastern ‘half’ of Doncaster did not support the original designation of the Green Belt and was in some ways more suitable for planned urban expansions.

4 Extending the Green Belt: Best Practice Guidance and Comparative Examples

4.1 Overview

NPPF Paragraphs 82 and 83 stipulate that Green Belt boundaries can only be reviewed through the production of a new Local Plan and only where exceptional circumstances can be demonstrated. It is therefore prudent to examine best practice examples and understand the exceptional circumstances provided in each case to change the general extent of Green Belt boundaries.

4.2 National Planning Policy Context

The National Planning Policy Framework states: “New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.” (Paragraph 82). The policy furthers, that if proposing a new Green Belt, taken to include both completely new and extension of existing, Local Planning Authorities should:

- *‘demonstrate why normal planning and development management policies would not be adequate;*
- *set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;*
- *show what the consequences of the proposal would be for sustainable development;*
- *demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and*
- *show how the Green Belt would meet the other objectives of the Framework’ (paragraph 82).*

There is no direct reference made National Planning Practice Guidance (NPPG) to New Green Belt Policy. The NPPG does, however, emphasise the degree of protection afforded to Green Belt once designations have been established. Paragraph 44 reconfirms the guidelines set out the NPPF “...local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against policies in the Framework..., or specific policies in the Framework indicate development should be restricted. Such policies include land designated as Green Belt.”⁴

NPPG paragraph 44 also refers to the NPPF and the importance of Green Belt boundaries only being altered in exceptional circumstances. Paragraph 34 also refers to “very special circumstances” needed to justify inappropriate development

⁴ NPPG (2014) Paragraph: 044 Reference ID: 3-044-20141006

on a site within the Green Belt. The benefits of Green Belt designation therefore relate to the extension of very special circumstances within the area.

4.3 Best Practice Guidance

The Planning Advisory Service ‘Planning on the Doorstep: The Big Issues – Green Belt’ guidance confirms land can only be included in Green Belt to achieve the five purposes as set out in Paragraph 80. Therefore, land proposed for inclusion in the Green Belt should be assessed against the five purposes to identify the level of contribution made and whether the land contributes to the overall aim of the Green Belt. Paragraph 79 of the NPPF states that ‘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’.

4.4 Comparative Examples

A brief review of best practice from other local authorities with recently adopted Local Plans (such as the Gloucester, Cheltenham and Tewksbury Joint Core Strategy and the Royal Borough of Windsor and Maidenhead Core Strategy) shows that new Green Belt has been introduced through Local Plans as a result of minor boundary modifications and, generally, no significant areas of Green Belt have been proposed. Northumberland County Council (Submission Draft Local Plan) and Cheshire East Council (at Examination) have both proposed, and subsequently rejected (in the case of Cheshire East Council), policies to extend the Green Belt designation.

Cheshire East Council Local Plan Examination

Cheshire East Council identified through their ‘New Green Belt and Strategic Open Gap Study’ (2014) that the land gap between Crewe and Nantwich is narrow and is mostly occupied by highways infrastructure and is rarely so wide that development cannot be perceived on the opposite side. This evidence resulted in the designation of new Green belt adjacent to Crewe within Policy PG3 of the Local Plan Strategy (2014), with a policy justification of maintaining ‘strategic openness of the gap between Crewe and the Potteries’.

The Inspector published his interim views on the Legal Compliance and Soundness of the submitted Cheshire East Local Plan on 12th November 2014 and provided subsequent clarification in a letter dated 28th November 2014. With regard to the proposed new area of Green Belt, the Inspector commented:

“...there seems to be insufficient justification for establishing a new Green Belt in the south of the district.” (Section A, paragraph 4).

In particular, the Inspector highlighted the following points needed to be addressed in relation to proposals to establish new Green Belt (in paragraphs 91 and 92 of his interim views and paragraph 2vi of his clarification letter):

- Identify exceptional circumstances needed to established proposed new Green Belt;

- Provide evidence to support the likely extent of the new Green Belt;
- Set out implications of proposed development within the new Green Belt search area;
- Demonstrate the other policy is insufficient and new Green Belt is therefore required; and
- Include proposed detailed boundaries of new Green Belt.

When reviewed against National Planning Policy Framework requirements for the extension of Green Belt, such as an ability to demonstrate exceptional circumstances and a consideration of whether other development management policies are inadequate, it was considered that alternative policy options may be more appropriate. A Strategic Gap Policy was proposed, with the purpose of protecting the setting and separate identity of settlements, retaining the existing settlement patterns and retaining benefits of open land near to where people live.

Northumberland County Council Local Plan

Although currently untested at examination, the Northumberland Local Plan Core Strategy – Pre-Submission Draft (October 2015) proposes a Green Belt extension around the Morpeth area. An extension to the Green Belt was originally identified within the Regional Planning Guidance in 2002, and defined generally within the text of the Northumberland Structure Plan (2005). Extension proposals also recognise a need to identify sufficient land to meet the growth requirements and therefore additionally includes a review of the inner Green Belt boundary.

The rationale for the extension links to the original purposes of the Green Belt, and specifically, will seek to preserve the special setting and character of Morpeth, prevent Morpeth from merging with neighbouring settlements, assist regeneration of villages in South Northumberland and safeguard the countryside from encroachment. Using textual references within the Structure Plan, the proposed outer boundary has been defined using strong infrastructure and natural features.

Conclusion: There are relatively few instances within recent years where Local Authorities have sought to extend their Green Belt designation. Whilst Northumberland CC Local Plan has progressed the extension of the Green Belt in their Publication Draft, this connects to a historic justification to extend the Green Belt within the Structure Plan policies. Cheshire East have decided against progressing a Green Belt extension during their Local Plan Examination as it was not sufficiently demonstrated that ‘exceptional circumstances’ exist for extension, or that development management policies were not performing well.

It is therefore prudent to use the five tests within the National Planning Policy Framework to determine whether ‘exceptional circumstances’ could exist for extending the Green Belt to the east. Section 5 represents the outputs of this evaluation.

5 Evaluating Evidence of Success of Countryside Protection Policy

5.1 Overview

Based on the evidence within Chapters 2 to 4, the following section seeks to evaluate the strength of the Countryside Protection Policy Area in preventing inappropriate development, followed by a review of whether ‘exceptional circumstances’ case could be made for extending the Green Belt designation further to the east or whether an alternative development management tool would be more acceptable for preventing inappropriate development in the countryside.

5.2 Evaluating the Success of the Countryside Protection Policy Area

Analysis of planning applications, planning appeals and planned future areas of growth shows that development has occurred within the eastern half of the countryside. The analysis indicates that:

- The Countryside Protection Policy Area (Core Strategy Policy CS3, supported by Unitary Development Plan Policy ENV2 and ENV4) has generally performed strongly when rejected applications for development in the countryside have been considered at appeal.
- Analysis of applications for development within the countryside highlighted that the majority of applications had been approved. There was an apparent concentration of development adjacent to, or within relatively close proximity of the existing settlements within the countryside.
- The perception of development pressure on the countryside is furthered by proposed future growth surrounding the airport and the DN7/ Unity site.

On balance, whilst there has been an apparently large number of applications for development within the countryside, these have been approved by Doncaster MBC and therefore considered to represent appropriate development within the countryside. The combination of current and saved policies CS3 and ENV4 is also performing relatively strongly at appeal.

5.3 Green Belt Extension: Evaluation against NPPF Paragraph 82

Paragraph 82 of the National Planning Policy Framework sets out criteria which a Local Planning Authority should demonstrate where new Green Belt is proposed. The following summarises the outcomes of the analysis of the ‘eastern half’ of Doncaster, the Countryside Protection Policy Area, against the requirements set out within Paragraph 82.

Demonstrate why normal planning and development management policies would not be adequate

This note has shown that in the past 5 years, the Countryside Policy has a) ensured that development in the heart of the countryside has been limited b) enabled (to the satisfaction of the LPA) a modest number of developments which provide wider benefits (and are aligned with the Core Strategy Settlement Hierarchy) to be permitted. In addition the role of the policy has been recognised and understood by Inspector's considering planning appeals, of which there have generally been very few.

Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary; and, Show what the consequences of the proposal would be for sustainable development.

The identification of 'major changes in circumstances' will need to be determined through the emerging Local Plan, particularly once a housing requirement has been determined. Currently the Issues and Options Local Plan draft sets out a settlement hierarchy similar to that of the Core Strategy and three options for growth and change. It is likely that change around Unity / Junction 5 of the M18 and around Robin Hood Airport as known likely changes will be a consideration in the preparation of the Local Plan, including an appropriate response to third party aspirations to grow and expand these locations. The next draft of the Local Plan (which will be consulted upon) will examine the appropriate scale and quantum of these new activities, balancing the potential change with achieving sustainable patterns of development. It will be important in preparing this draft plan that all potential changes are captured and considered, as it is an unforeseen major development proposal that may pose a consequence for sustainable development.

In addition, the Unitary Development Plan (1998) considered that 'the countryside in the eastern half of the Borough is in a number of ways more suitable for planned urban expansion than that in the west being generally of a lower landscape and agricultural quality'.

Conclusion: As the emerging Local Plan is only at Issues and Options stage, it is not possible to understand whether an actualised or perceived 'major change in circumstances' will develop as the plan arises. To allow for comparison of development within the Green Belt against the Countryside and whether this would achieve principles of sustainable development, it may be prudent to include this within the Sustainability Assessment.

Demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas

To demonstrate whether the eastern countryside of Doncaster is appropriate for designation of Green Belt, it is necessary to assess whether this area could meet the original purpose of the South Yorkshire Green Belt, the five purposes of Green Belt and how this aligns with neighbouring authorities:

Meeting the original purpose of the South Yorkshire Green Belt

The original role of the South Yorkshire Green Belt was to 'prevent the merging of the large urban areas of Doncaster, Rotherham, Sheffield, Barnsley and Wakefield'. The Growth Strategy for the North (1966) sets out how the

designation of Green Belt was intended as a positive policy feature, to ‘check the further growth of urban areas, prevent their coalescence, preserve the special character of towns and preventing the spoliation of urban fringes’.

Whilst development has occurred in the Countryside Area of the Local Authority, the eastern area does not form part of the sandwiched gap between the named large built up areas within South Yorkshire.

Conclusion: The eastern area of Doncaster does not meet the original purposes of the Green Belt.

Meeting the Five Purposes of the Green Belt

Unitary Development Plan Policy ENV 4 sets out the purposes of the Countryside Policy Area. Similar to the five Purposes of the Green Belt as set out within NPPF, ENV2 states that the countryside will:

- ‘Preventing settlements from coalescing’ (similar to Purpose 2 within NPPF)
- ‘Assist in safeguarding the countryside from encroachment’ and to ‘provide opportunities for outdoor sport and recreation’ (equal to Purpose 3 within NPPF)
- ‘To provide an attractive setting for towns and villages’ (similar to the emphasis within Purpose 4 of the NPPF)
- ‘To assist in regeneration by directing development towards urban areas and strategic allocations’ and ‘to help sustain rural communities and a diverse rural economy’ (similar emphasis to that of Purpose 5 within the NPPF).

The ‘Purposes of the Countryside’ as established within UDP (1998) Policy ENV2 therefore do not seek to achieve NPPF Purpose 1 of the Green Belt, ‘to check the unrestricted sprawl of large built up areas’. Sprawl is defined as ‘spreading out of built form over a large area in an untidy or irregular way’ (Oxford English Dictionary). However, given the original designation of the South Yorkshire Green Belt, the potential of the Green Belt to sprawl ‘towards’ another large built up area is inferred.

Conclusion: The eastern Countryside area of Doncaster does not achieve NPPF Purpose 1 of the Green Belt, as there are no large built up areas to the east of Doncaster for built form to sprawl towards.

Designation within Neighbouring Local Authorities

Selby District Council contains portions of both the York and Leeds Green Belt areas, whilst North Lincolnshire and Bassetlaw do not contain any land designated as Green Belt. Whilst the Selby Green Belt does extend beyond the East Coast Mainline, near Balne, this area is more characteristic of an area of countryside (as set out within the Selby Green Belt Review Stage 1). Extending the Green Belt beyond the East Coast Main Line would therefore be discordant with the General Extent of the South Yorkshire Green Belt.

Conclusion: Generally speaking, areas within neighbouring Local Authorities which adjoin the Countryside Protection Policy Area within Doncaster are not identified as Green Belt. Although the Selby Green Belt to the north extends in

part beyond the East Coast Mainline, this area is generally considered to be more characteristics of the countryside.

Show how the Green Belt would meet the other objectives of the Framework

For the Countryside Protection Policy Area to meet the requirements set out within Paragraph 82, it would be necessary to demonstrate how designation of the Green Belt in the east would meet other objectives within the National Planning Policy Framework. The ethos of the NPPF is to achieve positive growth and deliver sustainable development through the planning system⁵. Rolling-out a restrictive policy tool across the eastern area of Countryside, which the UDP (1998) argues is more suitable for development, is unlikely to achieve positive growth within the Local Authority.

Conclusion: Analysis against the requirements set out in Paragraph 83 of the NPPF indicates, the eastern area of the countryside does not meet the five tests of the Green Belt or align with the original designation for South Yorkshire. Although ‘major changes in circumstances’ will evolve through the production of the new Local Plan, the Unitary Development Plan (1998) considered that ‘the countryside in the eastern half of the Borough is in a number of ways more suitable for planned urban expansion than that in the west being generally of a lower landscape and agricultural quality’. Finally, it has not been demonstrated through previous planning decisions that the Countryside Protection Policy Area is permitting inappropriate development within the Countryside, or that it has performed inadequately.

It is therefore prudent to consider that the eastern countryside area of the Borough does not meet the five tests set out within Paragraph 82 of the NPPF, and that alternative development management functions may be more appropriate. This could address concerns of extensive development pressures within the Countryside.

Evaluating against NPPF Paragraph 82: Overall Conclusion

Whilst the detail within Paragraph 82 is not explicitly clear as to whether Local Planning Authorities should seek to demonstrate all exceptional circumstances listed to establish new Green Belt, as there is no ‘large built up area’ to the east of Doncaster it is not possible to demonstrate the ‘necessity of the Green Belt’ extension further eastwards. Equally, even if there is a perception of a ‘major change of circumstances’ within Doncaster, there is currently no demonstration as to why normal planning and development management policies to deliver positive, planned and aspirational growth would not be adequate.

5.4 Evaluation of Alternative Development Management Tools

The following section considers potential alternative development management tools which could be applied, in isolation or in combination with each other, within the eastern portion of the Local Authorities. The risk and benefits of

⁵ NPPF (2012) Ministerial Foreword

extending the Green Belt have been included within this assessment for comparison.

Table 3 Alternative Policy Tools

Options		Comments
Extend Green Belt across eastern 'half' of Doncaster		<p>This option would include the extension of the Green Belt around the eastern area of Doncaster.</p> <p>Risks: Eastern area of the Countryside does not meet the five purposes of the Green Belt, as outlined in the NPPF, or support the original designation of the South Yorkshire Green Belt. It is therefore questionable as to whether 'exceptional circumstances' case for new Green Belt could be sufficient demonstrated.</p> <p>A review of recent comparative cases indicates complexity in extending this Green Belt and Local Plan production delays. Procedurally, this could require the definition of large areas of safeguarded land which could represent a less positive planning and less certain designation than the Countryside Policy Area.</p> <p>Benefits: As set out within the NPPF, Green Belt designation affords the greatest degree of protection and development can only occur if permitted by the NPPF or if 'very special circumstances' are demonstrated.</p>
Retain Core Strategy Policy CS3 and saved policies within the UDP Environment Chapter into emerging Local Plan	Direct Translation of Existing Policies	<p>This option would result in a direct translation of policy CS3 in the Core Strategy and the saved policies from the UDP into the emerging Local Plan.</p> <p>Risks: Does not address future development pressures arising within the Countryside.</p> <p>Benefits: Evidence that the policies have performed strongly at recent appeal and have resisted inappropriate development. This option would therefore represent a robust and tested option.</p>
	New Policy: Identify clear Development Limits surrounding settlements and growth areas	<p>This option would result in a direct translation of policy CS3 in the Core Strategy and the saved policies from the UDP into the emerging Local Plan. However, this would also include the introduction of clear development limits around settlements and growth areas, as opposed to current development limits defined indirectly by the extent of UDP allocations. Types of developments that are considered acceptable on the edge of settlements would need to be clearly defined, and consultation would be necessary as to how loose or tightly boundaries should be defined.</p> <p>Risks: Debate in the definition of flexible or rigid development limits.</p> <p>Benefits: This would allow a clear definition of areas of strict control and those areas where development is 'in principle' likely to be appropriate.</p>
	New Policy: Identify Development Limits surrounding settlements and growth areas, and buffers for	<p>This option would result in a direct translation of policy CS3 in the Core Strategy and the saved policies from the UDP into the emerging Local Plan. However development management policies would also set out flexibility about types of appropriate development which may be acceptable within the countryside based on specific buffers around defined development limits. This would require consultation with stakeholders to determine whether flexibility of development would support growth, and would need to be progressed in accordance with wider</p>

	<p>different types of appropriate development</p>	<p>initiatives, including the protection of landscapes, within the Local Plan.</p> <p>Risks: Perception that the strength of the countryside policy is being undermined by offering additional flexibility to the types of ‘appropriate development’. There is also a risk in that this represents an ‘untested’ development management tool for accommodating growth.</p> <p>Benefits: This approach would support economic development and may be more aligned to principles of sustainable development. This approach would also allow a definition of areas of strict control and those areas where development is ‘in principle’ more likely to be appropriate, whilst maintaining an element of discretion.</p>
<p>New Policy: Strategic Countryside Gaps or Green Gaps</p>	<p>As implemented within Selby District Council, this option could be applied where there is a need to protect the separation between settlements or where there are particularly sensitive areas of the countryside.</p> <p>Risks: Not identified as a widely used tool and do not have a national policy counterpart. This does mean that any definition of strategic countryside gaps or green gaps would need to be particularly clear and specific to Doncaster, and subject to an individual evidence base documents.</p> <p>Benefits: This policy could be used in combination with other policy tools.</p>	

The analysis table highlights a varied range of policy options which can be taken forward and combined with other options. The following section recommends which policy tool is likely to be most appropriate for use within Doncaster and suggests potential next steps for taking the policy forward.

6 Recommendations and Conclusion

6.1 Conclusions

There has been historic debate about whether the designation of Green Belt should be extended eastwards to the edge of the Doncaster Local Authority Boundary. This technical note has sought to review how the Countryside Protection Policy Area has performed in protecting the countryside to the east of Doncaster from inappropriate development, or (if there are no appropriate alternatives) considers whether there is sufficient justification to extend the Green Belt. In conclusion:

- The Countryside Protection Policy Area has performed relatively well in protecting the countryside to the east of Doncaster from inappropriate development. Specifically, where development has taken place, this has generally been to enable strategic infrastructure, to meet local need where it exists or where exceptional circumstances have been demonstrated. More recently, residential development has been permitted where this could support the settlement hierarchy identified within the Core Strategy. There are very few instances where development has been permitted in isolated rural locations and the Policy has performed relatively strongly at appeal.
- Section 5 considers whether the extension of the Green Belt boundary could demonstrate the exceptional circumstances set out within Paragraph 82 of the National Planning Policy Framework. Whilst the guidance is not explicitly clear about whether extension of Green Belt would need to demonstrate all requirements within Paragraph 82, there is no demonstration of why existing development management tools are not adequate or the necessity of the Green Belt to the east. In addition, it is not clear whether the combination of planned housing and employment growth and City Region Growth Areas at RHADS and DN7 will represent an actualised or perceived major change in circumstances. On the basis that the majority of these requirements for exceptional circumstances cannot be demonstrated, or are unlikely to be demonstrated as the Plan progresses, it is considered that the proposal to extend the Green Belt eastwards is unlikely to demonstrate exceptional circumstances.

6.2 Recommendations

Based on the conclusions that the existing Countryside Protection Policy Area is performing relatively strongly and that there are unlikely to be instances where extension of the Green Belt designation is likely to demonstrate all requirements within Paragraph 82 of the NPPF, it is worth considering whether the existing Policy wording could be further strengthened or supported by other development management policies. This would have the dual purpose of reducing the perception of growth resulting in inappropriate development, without actually reducing opportunities to deliver positive and planned growth.

Although it may be necessary to explore additional development management policies and tools as the plan progresses, the first key recommendation will be to

define clear ‘settlement limits’. Whilst these may physically remain as defined within the Unitary Development Plan, it would represent a clearer and more accessible response to the public to ensure limits are well-defined as opposed to formation of development limits by the extent of individual allocations.

Secondly, it would be prudent to reference Growth Areas within future policy-wording of the Countryside Policy Protection Area. Indeed, this may include liaison with DMBC Officers, developers for each Growth Area and technical experts to determine key landscape features or descriptive ‘buffers’ of features which it would be important for future-iterations of the Countryside Policy Protection Area to protect.

Appendix 1: Recent Planning Applications in the Countryside Area

Table 4 Recent Planning Applications within the Countryside Area

Type	Application Details	Description	Commentary
Outline Major Application	Reference: 13/00435/OUTM Address: Land east of Poplars Farm, Hurst Lane, Auckley, Doncaster, DN9 3NW Decision Date: 3 rd Oct 2013 APPROVED	Outline application for the erection of business park comprising public house (Class A4), office and light industrial floorspace (Class B1), light and general industrial floorspace (Class B2), storage and warehouse floorspace (Class B8) and education and training floorspace (Class D1) with associated vehicular and pedestrian accesses on approx. 10.9ha of land (approval being sought for access)	The officer confirms that core strategy policies support the western expansion of employment uses along the airport access road, and the site was shown for employment uses within the draft Sites and Policies document as well as the Airport Masterplan (Policy CS6). The officer concluded that the proposed development is acceptable.
	Conclusion	The proposal aligns with the direction within the Core Strategy Policy CS6 and the site was allocated for employment uses within the draft Sites and Policies document. The principle that the site was acceptable within the countryside had already been agreed.	
Outline Major Application	Reference: 13/00796/OUTM Address: Land Off Hatfield Lane Armthorpe Doncaster Decision Date: 20 th June 2014 APPROVED	Outline application for Commercial/Employment development (Class B1, B2 and B8) on approx 12.83ha of land (Approval being sought for access)	There is no mention of the Countryside Protection Policy Area within the Case Officers report.
	Conclusion	There is no mention of the Countryside Protection Policy Area within the Officers Report.	
Outline Major Application	Reference: 14/01789/OUTM Address: Land Off Doncaster Road Armthorpe Doncaster Decision Date: 2 nd October 2015 REFUSED	Outline application for residential development (Class C3) with open space, landscaping and associated access on approx 17.72 ha of land.	The proposed development site comprised a very open, uncontained field to the south of Doncaster Road. The proposal was refused as it represents inappropriate development within the countryside and is therefore contrary to Policy CS3 of the Core Strategy and Policy ENV4 of the UDP.
	Conclusion	The Countryside Protection Policy Area and ENV4 of the UDP was sufficiently strong enough to refuse development within the Green Belt.	

Outline Major Application	Reference: 15/00806/OUTM Address: Land Between Doncaster Road And Lings Lane Hatfield Doncaster DN7 6AB Decision Date: 5 th August 2015 REFUSED	Outline application for residential development on approx 2ha of land (Approval being sought for access) (being resubmission of application 13/02059/OUTM, refused on 22/01/2015).	The proposed development site comprised a partially contained area between Lings Lane and the A18. The proposal was refused as it represents inappropriate development within the countryside and is therefore contrary to Policy CS3 of the Core Strategy and Policy ENV4 of the UDP.
	Conclusion	The Countryside Protection Policy Area and ENV4 of the UDP was sufficiently strong enough to refuse development within the Green Belt.	
Full Major Application	Reference: 12/00313/FULM Address: Rimmington Farm Low Levels Bank Hatfield Doncaster DN8 5TG Decision Date: 9 th October 2013 REFUSED	Erection of calf rearing unit (21.07m x 49.12m approx) including erection of log cabin for temporary use as farm manager's accommodation with landscaping and formation of new access on approx 0.93 ha of land	The proposed development was taken to an informal hearing appeal in 2014, with applicants appealing against refusal. The appeal was dismissed on 7 th August 2014, with the Inspector's report stating that there were considered to be no 'special circumstances' to warrant a new isolated dwelling in the countryside. The Inspector concluded that the proposed development would be contrary to the requirements of ENV2 of the UDP, amongst others.
	Conclusion	Appealed: 14/00005/REM	
Full Major Application	Reference: 13/00355/FULM Address: Land Off Grange Road Moorends Doncaster DN8 4NA Decision Date: 6th January 2014 WITHDRAWN	Erection of 152 dwellings on approx 4.12 ha of land	The proposed development site exists to the north east of Moorends, within the Countryside area. The application was withdrawn prior to determination.
	Conclusion	The application was withdrawn prior to determination.	
Full Major Application	Reference: 13/01907/FULM Address: Yorkshire Wildlife Park Brockholes Lane Branton, Doncaster Decision Date: 2nd December 2013 APPROVED	Erection of new main entrance incorporating new shop, glass canopies over doors and walkway to side, feature curved wall to entrance, five shop units and formation of new ticketing and entry points in main courtyard, erection of slide barn following demolition of some existing buildings including creation of "African Village" walk through enclosure incorporating meerkat house, and timber fencing	The proposed development site exists within the countryside to the south of Branton. There is no mention of the Countryside Protection Policy Area within the Officers Report, however as the development comprised an extension to an existing wildlife park this could be considered to be an open recreational use.
	Conclusion	This application was approved, however as it relates to the extension of an existing wildlife park and is a recreational use, this could be considered to be appropriate development in the Countryside.	
Full Major Application	Reference: 13/02115/FULM	Erection of all-weather equestrian ménage arena (50.0m x 33.5m).	The proposed development site exists to the south Rossington Hall. There is no mention of the Countryside

	Address: Northern Racing College The Stables Bawtry Road Rossington Decision Date: 10.01.2014 APPROVED		Protection Policy Area within the Officers Report, however as the development comprised a new ménage area this could be considered to be an open recreational use.
	Conclusion	This application was approved, however as it relates to the extension of an existing stables and is a recreational use, this could be considered to be appropriate development in the Countryside.	
Full Major Application	Reference: 14/02125/FULM Address: Land South Of Holme Wood Lane Armthorpe Doncaster Decision Date: 13.11.2014 APPROVED	Erection of warehouse for Class B8 use with ancillary offices, new access road, link bridge, landscaping and parking on approx. 15.7ha of land.	The proposed development is situated within the Countryside Area to the south of the existing employment area in Armthorpe. There is no mention of the Countryside Protection Policy Area within the Officers Report, however the site is relatively well contained by residential built form on one side and the M18 on the east.
	Conclusion	The application was approved, however the site is relatively well contained by the built form.	
Full Major Application	Reference: 14/02726/FULM Address: Orchard Farm Hurst Lane Auckley Doncaster Decision Date: 10.02.2015 APPROVED	Construction of a new showroom for agricultural equipment with workshop and storage, training area and ancillary offices, landscaping and other works including new vehicular access following demolition of existing buildings	The proposed development is situated within the Countryside Area to the north west of the airport. There is no mention of the Countryside Protection Policy Area within the Officers Report.
	Conclusion	The application was approved,	
Full Major Application	Reference: 14/02713/FULM Address: Mill Race Farm Wroot Road Finningley Doncaster DN9 3DY Decision Date: 28.09.2015 APPROVED	Redevelopment of former rural pursuit and gun centre to new animal rescue and visitor centre with overnight staff accommodation, including café, shop, kennels, stables, outdoor equestrian arena, building for storage and ancillary use for food preparation, treatment and administration	The proposed development is situated within the Countryside Area, and whilst there is no mention within the Officers Report, an animal rescue centre could reasonably be considered an appropriate use in the countryside.
	Conclusion	The application was approved, however, an animal rescue centre could be reasonable considered as an appropriate use in the countryside.	
Full Major County Matters application	Reference: 12/02729/FULMC Address: Finningley Quarry Croft Road Finningley Doncaster DN9 3DW Decision Date: 09.06.2013 APPROVED	Change of use of vacant land to waste recycling facility, use of existing building as a site office and establishment of site infrastructure (Sui generis)	The Decision Notice states that, against the policy background, the proposed waste treatment facility is acceptable.
	Conclusion	The application was approved, however the officer considered that this was a balanced policy justification.	
Full Major County	Reference: 12/02729/FULMC Address: Finningley Quarry Croft Road Finningley Doncaster DN9 3DW	Installation of anaerobic digestion plant to include digester, two silage clamps, combined	The Decision Notice did not refer to the Countryside Protection Policy Area.

Matters application	Decision Date: 09.06.2013 APPROVED	heat and power unit and associated works ancillary to dairy farm	
	Conclusion	The application was approved, however this was to support the development of Bank House Farm.	
Full Major Application with Environmental Assessment	Reference: 12/00947/FULA Address: Land From Junction 3 M18 To A638 Bawtry Road At Parrotts Corner And To West End Lane, Rossington Doncaster Decision Date: 10.07.2012 APPROVED	Construction of the Finningley and Rossington Regeneration Route Scheme (FARRRS) comprising a new part dual carriageway, part single carriageway highway; together with bridges, embankments, subways and associated works, from Junction 3 of M18 Motorway to Parrots Corner junction of A638, including a link to West End Lane, Rossington.	The Decision Notice states that, against the policy background, the proposed development of the link road is acceptable. The Decision Notice stipulated that the proposed mitigation measure will not have any materially adverse impacts upon the surroundings and the scheme has been designed to minimise adverse visual amenity and impact on landscape. The Notice further states that ‘The scheme is recognised as essential for securing regeneration and economic growth, in particular for Rossington and the area to the south of Doncaster. Beyond that, it is envisaged that FARRRS will underpin the growth aspirations for Doncaster and the wider South Yorkshire area, as well as Robin Hood Airport’.
	Conclusion	The application was approved within the Countryside Protection Policy area, however it was considered to be a balanced planning judgement.	
Reserved Matters Application Approved	Reference: 08/02201/OUTA Address: Holme Wood Lane, Armthorpe, Doncaster Decision Date: 24.12.2009 Reference: 12/02445/REMM Decision Date: 6.02.2013 APPROVED	Details of appearance, landscaping and scale for Unit C of an employment park comprising buildings for use within Classes B1(c), B2 and /or B8 , construction of roads and ancillary facilities, and landscaping on approx. 46.52ha of land (being amendment to maximum size and height of the Class B1 units (P, Q and R)) (being matters reserved in outline application previously granted permission under ref 08/02201/OUTA on 24.12.2009)	The Decision Notice states that against the policy background referred, the application represents acceptable development.
	Conclusion	The application was approved, however the decision notice considers that this was a balanced policy justification.	
Reserved Matters Application Approved	Reference: 09/02048/OUTM Address: Land Off Hurst Lane Adjoining Airport Hayfield Lane Auckley Doncaster Decision Date: 21.11.2011	Details of access, appearance, landscaping, layout and scale for the erection of 352 dwellings on approx 18.6ha of land (Being matters reserved in outline application previously granted under ref: 09/02048/OUTM on 21.11.2011)	The decision notice states that: ‘Having taken into account all the planning considerations raised in the consultations and representations, against the policy background referred to above, it has been concluded that the proposal is acceptable’.

	<p>Reference: 12/02925/REMM Decision Date: 8th April 2013 APPROVED</p>		
	<p>Conclusion</p>	<p>The application was approved, however the decision notice considers that this was a balanced policy justification.</p>	