Hearing Statement – Matter 4

Doncaster Local Plan

On behalf of Firsure Ltd

August 2020
1. **Introduction**

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

- Matter 4: Green Belt

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

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

1.4. Firsure Ltd has also expressed a desire to attend and participate in Matter 4 of the Examination in Public.
2. **Matter 4 – Green Belt**

Q4.1. Were all reasonable options for meeting identified development needs in non Green Belt locations fully examined during the preparation of the Plan? In particular:

a) Does the Plan make as much use as possible of suitable brownfield sites and underutilised land?

b) Would the Plan be effective in optimising the density of development and making effective use of land in line with chapter 11 of the NPPF?

c) What would the consequences be for sustainable development of accommodating all development needed during the Plan period in non Green Belt locations?

d) Was the Plan informed by discussions with neighbouring authorities about whether they could accommodate some of the Borough’s identified need for development?

Part A

2.1. Firsure Ltd have no specific comment to make in response to this matter.

Part B

2.2. Firsure Ltd have no specific comment to make in response to this matter.

Part C

2.3. Paragraph 59 of the Framework is clear that to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.

2.4. The relative needs of settlements have been assessed. Firsure Ltd have identified a number of settlements (Matter 3 and original representations) where the identified need, is not met by the proposed distribution. This includes Doncaster MUA, which is the focus for growth and
employment. Doncaster MUA it is constrained to the north by flood risk and to the west by Green Belt. It is necessary to release some Green Belt land to ensure that the identified needs and the long term economic growth of the Borough can be met. Not reviewing or releasing Green Belt land around Doncaster MUA would have placed additional pressure on land liable to flooding, contrary to the Framework, or serve to push development out to the few relatively unconstrained settlements, leading to unsustainable patterns of development. Exceptional circumstances exist within Doncaster to support the review of Green Belt and subsequent release of Green Belt sites.

2.5. Firsure Ltd consider that further land should be released from the Green Belt to ensure that the identified needs can be met and that there is a sufficient supply of deliverable sites in Doncaster.

2.6. Within Firsure Ltd original representations, and in response to Matter 3, we consider that Policy 3 should be revised to support additional growth at Rossington, reflecting the scale and the location of the settlement with regards to existing and future employment opportunities. Firsure Ltd maintain in their earlier representations and the Role and Growth of Rossington document, that Rossingtons role in delivering housing growth to support economic growth should be revisited. There is significant investment in and around Rossington, including at IPORT, Airport, PGL golf course and improved accessibility. Firsure Ltd maintain that there is a need for additional allocations within Rossington to support the level of economic growth in this location and support more sustainable travel patterns. Firsure Ltd maintain that the following site should be allocated.

- Site 302 and 305, Stripe Road, Rossington

2.7. The presumption in favour of Sustainable Development is at the heart of the Framework. The Framework is clear that this means meeting the development needs of an area and ensuring that Plans are flexible. Without a considered release of Green Belt land within Doncaster, the ability to meet the identified housing needs would be hindered, and this would have significant implications on the delivery of the Plans wider objectives and in particular economic growth of the Borough.

Part D

2.8. Firsure Ltd has no specific comment in relation to this point.
Q4.2. Assuming it is necessary to remove land from the Green Belt, did the approach taken in the Plan give first consideration to land which has been previously developed and/or is well served by public transport?

Firsure Ltd have no specific comments on this issue.

Q4.3. Would development on each of the eight housing allocations removed from the Green Belt promote sustainable patterns of development?

Firsure Ltd considers that the identified need for housing cannot be met within Doncaster without the release of Green Belt sites.

Firsure Ltd consider that Rossington is a sustainable settlement within the Borough and its location, as stated in matter 3, means that it is capable of providing housing growth to support the economic growth associated with the Airport, IPort and PGA golf course. Firsure Ltd consider that the role of and housing requirement for Rossington should be revised having regard to its locational advantages.

Firsure Ltd consider there is a need for additional allocations within Rossington to deliver sustainable patterns of development.

Firsure Ltd consider that this Site 302 and 305 should be allocated.

Q4.4. How would development on each of the eight housing allocations removed from the Green Belt affect the purposes of including land in the Green Belt?

Firsure Ltd have considered the performance of Site 302 and 305 against the Framework within the Advocacy submitted alongside our representations. Firsure Ltd considers that the
site performs a limited Green Belt function, and that the new strengthened Green Belt boundaries can be drawn to provide a robust long term boundary. Firsure Ltd considers that the site forms a logical housing allocation in Rossington and will support the strategic aims of the Plan.

Q4.5. Are the suggested changes in the Council’s response to PQ10 necessary to make the Plan sound, and would they ensure that the proposed boundaries around each of the eight housing allocations removed from the Green Belt are clearly defined using physical features that are readily recognisable and likely to be permanent?

2.15. Firsure Ltd has no specific comment in relation to this issue.

Q4.6. Will the proposed Green Belt boundaries around each of the eight allocations removed from the Green Belt need to be altered again at the end of the Plan period?

2.16. Firsure Ltd has no specific comment in relation to this issue.

Q4.7. Are the suggested changes set out in the Council’s responses to PQ9 and PQ10 necessary to make the Plan sound, and would they be effective in securing compensatory improvements to the environmental quality and accessibility of remaining Green Belt land that would offset the impact of removing the eight housing allocations from the Green Belt?

2.17. In response to PQ10, the Council propose the following modification to all Green Belt Allocations:
As the site allocation results in the loss of Green Belt land, this must be compensated for by contributing to improving the environmental quality and accessibility of remaining Green Belt land within the vicinity of the site. Details of specific sites and projects will be established in discussion with the Council.

2.18. Firsure Ltd is concerned that at present this is not sufficiently clear to implement. Firsure Ltd is concerned about the lack of clarity and evidence to support the proposed policy approach, which provides uncertainty. There is insufficient detail to understand what the specific compensatory improvements will be, how they will be secured and on what terms and therefore what the implications will be on delivery.

Q4.8. Have exceptional circumstances to justify removing each of the eight housing allocations from the Green Belt been fully evidenced and justified?

2.19. The Framework is clear that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to respond to change. As a minimum strategic policies should provide for objectively assessed need for housing (paragraph 11), and that ‘a sufficient amount and variety of land can come forward where it is needed’ (Paragraph 59).

2.20. Firsure Ltd have identified in response to Matter 2 that the Submission Plan underestimates the need for housing across the Borough, and that consistent with the level of growth being promoted within the Plan the requirement should be higher. A lower requirement/range of requirements risk constraining the economic growth of Doncaster.

2.21. Notwithstanding the view that the requirement should be higher, Firsure Ltd set out in response to Matter 3 and within earlier representations that the proposed allocations do not deliver the strategy proposed in Policy 2 (as submitted) and Policy 3. The proposed distribution against the Council’s own targets shows a deficiency and significant under provision in Doncaster, Adwick, Consibrough – Debaby, Mexborough, Thorne – Moorends, Sprotbrough, Tickhill and Bawtry. There would be significant under provision in Carcroft without any Green Belt release. Further, we consider that the proposed distribution does not reflect the growth potential of Rossington and does not support the long term sustainability. Firsure Ltd consider additional allocations are required in Rossington.
2.22. We also consider under Matter 5 that not all sites identified within the supply are capable of delivery or at least delivery at the rate forecast by the Council. As such there is a need to ensure additional allocations to meet the need for housing within the District.

2.23. Firsure Ltd consider that exceptional circumstances to support the release of sites from the Green Belt has been demonstrated. However, Firsure Ltd considers that justification extends towards additional Green Belt sites being required to deliver the strategy. Firsure Ltd consider the Plan should support a greater role for Rossington in accommodating housing growth in order to align the distribution of housing growth with current and proposed locations for future economic growth, and the Plan’s wider aims to deliver regeneration.

Q4.9. Have exceptional circumstances to justify making the other changes to the Green Belt referred to in the Council’s response to PQ8 been fully evidenced and justified?

2.24. Firsure Ltd has no specific comment in relation to this issue.

Q4.10. Assuming that I conclude that the Plan identifies sufficient land to ensure that justified development needs can be met in suitable locations throughout the Plan period, would there be exceptional circumstances to justify taking additional land out of the Green Belt at the present time, for example to try to ensure that Green Belt boundaries will not need to be altered again at the end of the Plan period?

2.25. Firsure Ltd consider that ‘safeguarded sites’ should be identified, to ensure that the Plan is sufficiently flexible consistent with the requirements of the Framework, and to ensure that the Green Belt boundaries will not need to be altered again at the end of the Plan period – or in advance.
2.26. Firsure Ltd have set out concerns with the requirement under Matter 2. Firsure Ltd are concerned that in a number of locations as identified herein, the allocations do not align with the proposed distribution leading to significant under provision in key settlements, including Doncaster MUA.

2.27. Firsure Ltd have reviewed the supply (Matter 5) and consider that there are risks to delivery of sites, which serve to reduce the supply further in Doncaster MUA and within key settlements constrained by the Green Belt.

2.28. Firsure Ltd is concerned that the Reserve Development Sites identified are not sufficient or capable to provide this role, as they are impacted upon by significant constraints such as flood risk, and HS2 Safeguarding. The identification of Reserve Development Sites, which are not necessarily developable is not consistent with the Framework. The identification of Reserve Development Sites which are acknowledged to have failed the sequential test, where other sites are available and fundamentally when a Level 2 SFRA has not been produced, is not consistent with the framework with regards to flood risk and is unsound.

2.29. It is concerning that all Reserve Development Sites in Doncaster are subject to flood risk when sites exist that are available and less constrained. For example, Firsure Ltd’ Site 302 and 305 performs well against the Sustainability Appraisal, is located in a sustainable settlement and is not constrained by flood risk. Firsure Ltd has submitted an advocacy report, which demonstrates that the site is available, suitable and achievable and therefore deliverable in accordance with the Framework.

2.30. With regards to other sources of supply, we have noted significant non implementation which has not been accounted for. We do not consider that windfalls should form a significant role in supply in the context of an up to date Plan incorporating allocations.

2.31. Firsure Ltd do not consider the potential supply of housing as set out in the Local Plan will be able to provide sufficient flexibility. Firsure Ltd consider that this flexibility is vital to deliver the growth ambitions of the Council and City Region. In that context and the ambitions of Government as set out in the recent Planning White Paper and the current consultation on the new standard methodology which increases the base position to higher than the housing requirement in the Plan, there needs to be greater flexibility in the Plan. Notwithstanding the need for flexibility during the current Plan period. Doncaster is significantly constrained by flood risk, therefore there will be a need for Green Belt release in order to meet longer term
needs stretching beyond the Plan period. Firsure Ltd therefore consider it is necessary to identify safeguarded land immediately to plan for the longer term.

Q4.11. Is policy 2 part 6 justified and consistent with national policy relating to development in the Green Belt, in particular that related to “limited infilling in villages”?

2.32. Firsure Ltd has no specific comment to make in relation to this issue.

Proposed Change

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

- Allocate additional Green Belt Sites to meet the identified deficiencies within the Plan, including Site 302 and 305.
- Identify suitable safeguarded sites
- Remove/deallocate the identified Reserved Development Sites.
- Provide greater clarity with reference to compensatory measures sought for individual sites.