HEARING STATEMENT

MATTER 4: GREEN BELT

ON BEHALF OF THE GASCOINE GROUP LTD (Ref: 04430)

Word count (excluding Inspector’s questions) – 1,611

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)  
PLANNING AND COMPULSORY PURCHASE ACT 2004

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1.0 Introduction

1.1 This hearing statement is provided on behalf of our client The Gascoine Group. It is made in respect of 'Matter 4: Green Belt. Responses are provided solely to questions which are directly relevant to our client's site and previous submissions made on their behalf.

1.2 The Gascoine Group is promoting one site through this Local Plan. This being, Land West of Bawtry Hall, Bawtry (site reference: 966).

1.3 Our Client is an important stakeholder in the plan making process and wishes to ensure that the Doncaster Local Plan is prepared in a robust manner that passes the tests of soundness contained in the National Planning Policy Framework (NPPF) (para. 35), namely that the plan is:

- Positively Prepared;
- Justified;
- Effective; and
- Consistent with national policy.

1.4 Our client supports many of the policies within the Local Plan and believes with modifications the plan should be found sound. We welcome the opportunity to comment on the Inspector's Matters, Issues and Questions and provide the following responses to selected questions in so far as they relate to our previous representations.
2.0 Inspectors Questions

2.1 The omission of a response to a specific question should not be construed as our client having nothing further to add. Our client reserves the right to respond not only to the questions identified in this hearing statement but others as relevant and deemed necessary during the hearing session(s).

2.2 The questions are taken in order of publication within the Matters, Issues and Questions document (ref: INSP4).

Accommodating development in non Green Belt locations

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?

2.3 Across the plan area the majority of the largest and most sustainable settlements are either fully or partially surrounded by tightly drawn Green Belt boundaries. To ensure the sustainability and continued vitality of these settlements it is imperative that they are allowed to grow, inevitably in some instances this will require amendments to the Green Belt boundary.

2.4 In the case of Bawtry, which is identified as a Service Town and Village required to accommodate 110 homes over the plan period, the settlement has been allocated for only 90 dwellings within development limits. There would, therefore, be a shortfall of 20 dwellings over the plan period.

2.5 The Council have recognised (DMBC7, Appendix to PQ8) that Bawtry is a sustainable settlement and that the housing requirement cannot be met without changes to the Green Belt. Site 141 (20 dwellings) is the only site within Bawtry proposed to be removed from the Green Belt.

2.6 To meet the 20-dwelling shortfall, any additional housing allocations would require further Green Belt release. Our client is concerned with any reduction or limitation on the housing target for a settlement purely on the basis that it is in a Green Belt location. The housing target for a settlement should be
focused on the need to ensure the settlement can grow in a sustainable manner to support the local community and its population. Housing allocations, and Green Belt release, should then be made according to meeting that need.

2.7 Accordingly, it is considered, in the case of Bawtry, that the potential for meeting identified development needs in non-Green Belt locations in not wholly possible, and that further Green Belt release is required to ensure identified development needs for the settlement can be met.

**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?**

2.8 Site density needs to be appropriate for the character and setting. The submitted plan (para. 16.22) notes that high density development is likely to come forward within the ‘Urban Centre Masterplan’. It is also noted that many of the Local Plans urban sites already have planning permission and as such the density is already set, leaving little room to manoeuvre (ref: DMBC3, para. 2.3.72).

2.9 Our client agrees with the evidence provided within the Council’s Green Belt Topic Paper (ref: DMBC3) that due to the requirements for family housing, the need to provide attractive deliverable sites, discussions with members of the HBF, the aspirations of Neighbourhood Plans in the area and need to balance density requirements against character and setting that there is no justification to increase site densities above those recently experienced.

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

2.10 This would have a significant and detrimental effect upon many of the settlements surrounded by Green Belt in terms of sustainability and vitality. It would also place undue pressure upon other areas of the borough to deliver the housing requirement. This could have significant consequences in terms of traffic movement, infrastructure and the provision of services and facilities.

2.11 As discussed in Q4.1, in the case of Bawtry, the identified housing need of 110
dwellings over the plan period cannot be met without further Green Belt release. Relying solely on delivering identified housing needs in non-Green Belt locations would detrimentally impact the vitality and sustainability of existing settlements and as such is not appropriate. Indeed, it is client’s view that additional Green Belt releases are required within Bawtry to ensure that the plan is sustainable to meet its own strategic priorities.

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

2.12 This is considered a matter for the Council to address.

**Sustainable patterns of development**

**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?**

2.13 The Council’s response to PQ8 states that using Green Belt to meet identified housing requirements is only proposed as a ‘last option’ then no other suitable sites exist in settlements which have allocations to help areas meet the spatial strategy. In the case of Bawtry, as alluded to previously, there is a shortfall of 20 dwellings which cannot be met in the settlement without further Green Belt release.

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

2.14 Our client does not wish to comment upon the appropriateness of the eight allocations proposed to be removed from the Green Belt. We do, however, consider it appropriate that sites are removed and indeed it is considered further Green Belt release is required to meet identified housing needs. I refer to the answer given in respect of Q4.1.

2.15 Bawtry is a high performing settlement and provides many primary services. It is well served by a district centre containing local services and amenities,
including a primary school and health care provision. It also has excellent public transport connections to higher level centres such as Doncaster, Worksop, Retford and Gainsborough through regular bus services. Bawtry is, therefore, considered a sustainable settlement suitable for new growth. Further Green Belt release in this settlement would meet identified housing requirements and promote sustainable patterns of development.

2.16 Our clients site is well-related to the current urban area of Bawtry and is in a sustainable location, as demonstrated by appendix 2 to our matter 3 hearing statement.

### Green Belt purposes

**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?**

2.17 Our client does not wish to comment upon the proposed allocations.

2.18 It is worth noting that our client’s interests at Land West of Bawtry Hall, Bawtry (site reference: 996) is not considered to perform strongly against the five purposes of Green Belt. It is considered that due to the isolated nature of this parcel of land in relation to the wider Green Belt, the site does not make an important contribution to the open character of the village or to the wider openness of the Green Belt and should not be ruled out for removal from the Green Belt to meet identified housing requirements in Bawtry.

### Green Belt boundaries

**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?**

2.19 Our client does not wish to comment upon 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?

2.20 Our client does not wish to comment upon the proposed allocations. I do, however, refer the inspector to our response to Q4.1 above and the fact that there are insufficient releases to meet identified need within Bawtry. On this basis the Green Belt boundary within Bawtry will need to be reconsidered at the end of the plan period.

Compensatory improvements to the Green Belt

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?

2.21 Our client does not wish to comment upon this issue.

Exceptional circumstances for changes to the Green Belt

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

2.22 Our client does not wish to comment upon this issue.

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?

2.23 Our client has no comments upon this question at this stage.

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?**

2.24 I refer to the answer given in respect of Q4.1. The Plan does not identify sufficient land to meet identified housing requirements in certain locations over the plan period. Indeed, our matter 2 statement is clear that the need for housing within the plan area is greater than identified in the submitted plan. It is therefore our view that additional land will need to be identified for development. Given the need to promote sustainable growth a proportion of this will need to be identified within Green Belt locations.

2.25 In the case of Bawtry, there is already a 20-dwelling shortfall. The Council identifies a reluctance to identify further housing allocations as this would require the release of further Green Belt land. Our client is concerned with any reduction or limitation on the housing target for a settlement purely on the basis that it is in a Green Belt location. The housing target for a settlement should be focused on the need to ensure the settlement can grow in a sustainable manner to support the local community and its population. Housing allocations, and Green Belt release, should then be made according to meeting that need.

2.26 In order to identify sufficient land and to ensure that justified development needs can be met in suitable locations throughout the Plan period, in the case of Bawtry, further Green Belt release needs to occur to meet identified needs. Accordingly, Green Belt boundaries will need to be altered before the end of the Plan period.