Submissions to Matter 13 Natural and Built Environment

on behalf of

Mssrs Cooper of Manor Farm Braithwell
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We act for Mr Cooper who is the landowner of the land at Manor Farm Braithwell.

We are instructed to attend the examination on his behalf and to comment on the issues that affect the development of this land and the associated matters that have been set out in our original submissions to the Doncaster Local Plan.

We have addressed the relevant questions in this Matter 13 and set out our comments below.

In response to the Inspectors questions :-

Q13.1. Is policy 28 justified and consistent with national policy and will it be effective in ensuring access to high quality open spaces and opportunities for sport and physical activity? In particular:

   a) The approach to open spaces defined on the Policies Map and open space policy areas in parts A and D.

   b) The approach to non-designated open spaces in part B, and the Council’s suggested changes relating to conservation areas and the setting of designated heritage assets.

   c) The Local Green Spaces defined on the Policies Map and the Council’s suggested change to list them in paragraph 10.17.
The Councils response in PQ 41 does not address the fundamental problem with the allocation of the land at Cardwell Court, Braithwell as Local Green Space.

PQ 41 summarises the reasons for the designation of this land which include tranquillity, setting to the listed buildings, character of the conservation area, protection of the mature trees and local views into the Conservation Area and designation supported for historic and aesthetic reasons.

This site already lies within the Conservations Area, that designation already protects the trees on the site, and the setting of the listed buildings that lie within the Conservation Area.

The evidence base document SDEB20 identifies the local green spaces that have been put forward and assesses them against a combined methodology of Doncaster’s own interpretation [Part A] and the NPPF [Part B]. Sites were required to pass A before proceeding to B.

The answers given in PQ 41 are a repetition of the site summaries in that document.

We do not consider that these documents are convincing that this site should become Local Green Space, and this is effectively a back door way of treating the site as green belt.

The situation at the site is as follows

- The site is part of an active farm holding run from Manor Farm at Braithwell immediately north of the site. It is currently down as grazing land but is used as part of the rotation of crops and animals raised on the farm.
- The site still remains allocated for housing in the UDP as part of a larger site known as PH 1 4/19, a site which included the subject site and the area now
developed as Cardwell Court and Maltkiln Farm Court. The site is shown on the Braithwell inset of the UDP and is one of two allocations in Braithwell.

- The landowner knew nothing of the proposed designation until the publication of the Draft Plan in 2018 to which he made objection.
- The land lies within the Area of the Braithwell Conservation Area and a TPO covers Trees on the site. The St James Church, Manor Farm and Dovecote are Listed Buildings.
- A Pre application submission in 2018 indicated a proposal that respected the heritage assets nearby, the trees on the site and the overall context.
- The proposal consisted of a development of new dwellings and conversions of the exiting farm buildings. New dwellings were kept to the south of the area and adjacent to Cardwell Court. The new dwellings were proposed in a sympathetic footprint and layout to respect the character of the area, and to improve the impact on the area of the estate type new dwellings in Cardwell Court and Maltkiln Farm Court. The proposals submitted are attached to demonstrate how this development could take place and preserve the essential important characteristics of the site. See Appendix 1.
- The inclusion of the site as Local Green Space will prohibit this proposal or any Development proposal that would have ensure the future of the Listed Buildings in and around the Manor House and in our view would have made a positive contribution to the village and the locality and achieved the aspirations of the Council.

**The Proposed Allocation as Green Space.**

The NPPF sets out at para 99- 101 policies about the designation of Green Space.

It is summarised from the background Documents SDEB20 that the concluding
reason for designation is “historical importance and beauty“

We do not consider that it is necessary to designate the site as Local Green Space to retain the historical importance of the site and its beauty, as our scheme or a similar proposal can retain the elements that contribute to both the heritage asset and attractive character [beauty]. Land could be dedicated in such a proposal for community access or as previously requested by the local church for an extension to the burial ground. The proposed designation will simply lock up the site, where there is no public access, and where changing farming practices could lead to a loss of tranquillity, outlook and amenity value.

In summary there is no need to allocate this site as Local Green Space to protect the historical importance of the area or its beauty. The area is already protected as a Conservation Area and the NPPG Paragraph: 011 Reference ID: 37-011-20140306 indicates that where land is already protected by a designation, consideration should be given to any additional local benefit that would be gained by designation as Local Green Space. It is not considered that there is any additional local benefit as the area’s historic importance is protected by the Conservation Area designation, and the presence of the listed buildings. The beauty of the area derives from the trees and is also protected both by the Conservation Area designation and by tree preservation orders. It is quite clear therefore that the matters that the proposed designation wishes to protect are already protected and another layer of designation is not justified.

We are therefore seeking the removal of the Local Green Space designation from the proposals map, and from any policy wording on the basis that it
unnecessary and does not achieve any additional local benefit. We are seeking the reinstatement of the land within development boundary at Braithwell to include the subject land which remains excluded from the green belt.