WRITTEN STATEMENT OF RESPONDENT: MR CHRISTOPHER OWEN IN RESPECT OF M12: TRANSPORT AND ACCESS AND/OR M16: OTHER ISSUES

This statement should be read in conjunction with the documents submitted by me on (i) 26 October 2018 with regard to the Informal Consultation: Draft Policies and Proposed Sites (“2018 Representation”); and (ii) 27 September 2019 with regard to the Publication Draft 2019 of the Doncaster Plan (“2019 Representation”) (together, “My Representations”).

Introduction

I am a layperson with no experience or knowledge of planning issues or examinations such as this. In responding to the Inspector’s questions, I have tried to answer as fully as possible and provide a response to the specific question raised in the context of my objection to the allocation of Site 350/407 as suitable for development in the Plan.

I am mindful that the Inspector has stated that any responses should only be in response to questions that relate to original representations and not introduce new arguments or evidence. In this regard, in order to answer the specific questions from the Inspector or aspects thereof, I have had to expand on arguments or evidence made in my original representations. All responses relate to the questions as they apply to Site 350/407. I trust under the circumstances my approach is acceptable.

Q16.2. Are there any parts of the Plan that have not been addressed by the questions set out above that are unsound?

Access issues as a consideration in the allocation of sites for development

Note: I could not see where this issue was covered in the Inspector’s Questions on Transport on M12 so have included my comments on this issue under Q16.2. I trust this is acceptable.

Nowhere in the Plan are access issues or the impact of a development on the local community arising from access problems factored into the criteria for allocating a site for development. Whilst the Plan does refer to the preparation of transport plans and assessments being required for certain developments, these are only required to be prepared after a site has been allocated for development, i.e. there is a presumption in the Plan that development is appropriate notwithstanding any transport constraints.

The issue of transport constraints and issues should however be a key part of the site selection methodology and factors such as the loss of amenity, disruption, access issues, and other issues that will be caused to the existing local community by development should be considered at an early stage during the site allocation process, rather than matters only to be considered after allocation for development. This should form part of the policies relating to transport in the Plan.
With regard to the Site, there are significant access issues which make it unsuitable for a development of the scale proposed in the Plan:

- The only possible access to or from the Site is by two unclassified roads from the existing quiet residential Rose Hill Estate. The only access to the Rose Hill Estate is through two 5.5 metre-wide roads which service the existing Rose Hill Estate from the A638 dual carriageway. Vehicles can enter the Rose Hill Estate from both roads but can only exit from one. This arrangement is unlikely to be able to be changed due to the proximity of both a zebra crossing and the Cantley traffic lights junction with the B1396 at the second of the two entrances.
- Having said that, although there are two entrances to the Rose Hill Estate, in practice, most vehicles use the Rose Hill Rise entrance (i.e. the one nearest to town on the A638) to access the estate.
- In order to reach the Site, it is necessary for vehicles to negotiate at least one 90 degree turn, either on Rose Hill Rise or the Avenue.
- Residents commonly park their vehicles along Rose Hill Rise and the Avenue, leaving only half the road free for traffic.
- On Rose Hill Rise, the road rises up and over a gradient. The rise is steep enough to reduce visibility for drivers on either side of the peak of the hill from seeing oncoming traffic.
- Traffic leaving the estate is unable to turn right towards Doncaster town centre. Instead traffic must head west for approximately 200 metres and, at the Cantley traffic lights junction with the B1396, enter a small signal-controlled traffic reservoir which permits a U-turn onto the westbound carriageway.

The roads serving the Site will therefore be unable to adequately cope with the traffic generated by an additional 166 dwellings and due to the geography of the Site and the existing Rose Hill Estate, it is unclear how it can possibly be changed to make it able to cope. Development of the Site will inevitably result in a significant loss of amenity and disruption to the existing local community.

No adequate consideration of such issues has therefore been made prior to allocation for development and the allocation of a further 166 dwellings, adding to the existing 175 dwellings in the Rose Hill Estate. Whilst it is accepted that Appendix 2 of the Plan refers to access issues relating to the Site, the approach taken has been to allocate the Site for development and “kick these issues into the long grass” for consideration at planning permission stage rather than make such considerations a key part of the site selection methodology, and enshrine such considerations in policy. The approach taken is inappropriate as it has led to the Site being allocated for development when it is unsuitable to do so.

A policy should be included in the Plan that makes it a requirement that access issues and impact on existing local communities are considered before allocation for development and as part of the site selection methodology. Such a policy should include the minimum criteria that must be met (e.g. in terms of road capacity, traffic safety, loss of amenity to residents caused by additional noise, pollution and disturbance, etc).

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1 The Site is bounded on the other three sides by a Local Wildlife Site, Doncaster racecourse, and a railway line which forms part of a wildlife corridor.
Appendix 2 of the Plan is not sound and in accordance with NPPF and the Policies set out in the Plan because Site 350/407 is allocated for development

As set out in My Representations and as evidenced further in the response to the Inspector’s questions, the allocation of Site 350/407 for development in Appendix 2 is not in accordance with NPPF or with the Plan’s own policies. The reasons for this have been set out in detail in the documents referred to.

As an overarching point, it is relevant that the Site is owned by DMBC and is currently up for sale to developers. DMBC therefore has a vested interest in the Site being allocated for development. The local community is therefore concerned (as it appears are others objecting to the Plan, e.g. the representation from Mr Tomlinson [04457]) that the development stage of the Plan appears to have been prepared so that pre-determined sites have received favourable scores to allow development.

As shown in My Representations and in my response to the Inspector’s Questions, a balanced and independent appraisal of the Site would show that the Site is unsuitable for development on a wide number of specific grounds, many of which in and of themselves on a stand-alone basis would make the Site unsuitable for development. Taken together however, these issues make it clear that the Site should not be allocated for development and should instead be considered a local green open space and/or part of the adjacent Local Wildlife Site and wildlife corridor.

In summary, the proposed development of the Site will:

- Ignore the local community’s objections and fail to take into account their views;
- Have an adverse effect on the residential amenity of the local residents and community;
- Result in an unacceptably high density / over-development of the site;
- Have a detrimental visual impact of the development and effect on the character of the neighbourhood;
- Have an adverse impact on highway safety with a lack of ability of the existing road system to cope with additional development;
- Have an adverse impact on the existing infrastructure (e.g. drainage, etc) with no ability for it to be improved;
- Cause significant adverse environmental impact and loss of biodiversity;
- Degrade and significantly impact upon the adjacent Local Wildlife Site and the wildlife corridor which runs through/ adjacent to the Site;
- Be unable to be compensated for through a biodiversity net gain; and
- Develop a site with “major archaeological constraints”, includes five monuments and is a site that has a high potential for the survival of significant archaeological remains according to DMBC’s own analysis.

Specifically the proposed development of the Site is not consistent with:

- NPPF as development of the Site is not sustainable (involving the total destruction of a diverse and rich open space used by the community and valued for its proximity to the community, beauty, tranquility, the richness of wildlife, recreational value and the significant impact it adds to the local character of the area), as well as the other more specific aspects of NPPF which are referred to in the Policies set out in the Plan referred to below.
• DMBC’s objectives and policies set out in Chapter 10 of the Plan, namely “to maintain, protect, enhance and extend all assets in the green infrastructure network in Doncaster” and Policy 27 – Green Infrastructure which requires DMBC to “protect, maintain, enhance and, where possible, extend or create Doncaster’s green infrastructure”. Development of the Site will not protect, maintain, enhance or extend the green infrastructure in the Borough.

• Policy 28 - Protecting Open Space and Non-Designated Open Space: “The Council will protect open spaces which provide important opportunities for formal and informal recreation as well as those which provide a social, cultural and ecological role”. Development will destroy a local open space which provides an important opportunity for informal recreation in an area deficient in open space and which provides a social and ecological role.

• Policy 30 - Ecological Networks (Strategic Policy): “Proposals will only be supported which deliver a net gain for biodiversity and protect, create, maintain and enhance the Borough’s ecological networks.” The proposal to develop the Site will not deliver a net gain for biodiversity and will not protect, create, maintain or enhance the ecological network.

• Policy 31 - Valuing biodiversity and geodiversity: “Proposals which may harm designated Local Wildlife Sites, Local Geological Sites, Priority Habitats, Priority Species, protected species or non-designated sites or features of biodiversity interest, will only be supported where ... the mitigation hierarchy is applied so that firstly harm is avoided wherever possible, then appropriate mitigation is provided to lessen the impact of any unavoidable harm, and as a last resort compensation is delivered to offset any residual damage to biodiversity; they use the DEFRA biodiversity metric to demonstrate that a proposal will deliver a minimum 10% net gain for biodiversity; they protect, restore, enhance and provide appropriate buffers around wildlife and geological features and aim to link these to the wider ecological network ....; they can demonstrate that the need for a proposal outweighs the value of any features to be lost ....” This development allocation will likely result in damage to the adjacent Local Wildlife Site. Development of the Site will be unable to meet any of the metrics set out in the Policy necessary for development to be supported.

• Policy 32 – Local Wildlife Sites. The Policy says that such sites should be extended where possible. The Site is adjacent to Red House Plantation which is a Local Wildlife Site and is basically contiguous with that site. Being a rich biodiverse habitat and part of/adjacent to a wildlife corridor, the Local Wildlife Site should be extended to encompass the Site.

• Policy 33: Woodlands, Trees and Hedgerows. “Proposals will be supported where it can be demonstrated that woodlands, trees and hedgerows have been adequately considered during the design process, so that a significant adverse impact upon public amenity or ecological interest has been avoided.” Development of the Site will result in a significant adverse impact upon current public amenity/use of the Site and the ecological environment.

• Policy 40: Development Affecting Archaeology. “Development affecting other archaeological assets will need to demonstrate how any benefits will outweigh harm to the site.” According to DMBC’s own archaeological survey, the Site has “major archaeological constraints” regarding the “suitability of the site for allocation” and a “high potential for the survival of significant archaeological remains associated with Roman settlement, agriculture and pottery production”.

The allocation of the Site for development is a source of much worry, concern and upset for the local community as evidenced by the local petitions and submissions to DMBC and the process for preparation of the Plan regarding this matter. We trust that the Inspector will give these concerns and the evidence submitted the necessary weight in his deliberations regarding the treatment of the Site in the Plan and rule that Site 350/407 should be removed as a site suitable for development in the Plan. Thank you.