HEARING STATEMENT

MATTER 4: GREEN BELT

ON BEHALF OF METACRE LIMITED (REF: 05173 / 05174)

Word count (excluding Inspector’s questions) – 1,942

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 Metacre Limited. 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 Metacre Limited are promoting two sites through this Local Plan. These being:

- Land at Crabgate Lane, Skellow (site reference: 186) – this is part of the proposed site allocation Land north of A1, Skellow in combination with site reference 165, and
- Land at Mill Lane, Skellow (site reference: 185)

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 the 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 The Council is clear that it has undertaken a thorough assessment of all opportunities within existing development limits to identify suitable and deliverable sites. The Council’s site assessment methodology provides a detailed assessment of this. Our client is broadly supportive of the Council’s assessment methodology but does query whether some site in the lower value areas will be delivered, due to viability issues. On this basis it is our considered opinion that the Council may actually have placed too great an emphasis upon suitable brownfield and underutilised sites in these areas at the expense of sustainable deliverable sites on the settlement edge.

*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?*
2.5 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).

2.6 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.

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

2.7 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.

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

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

**Sustainable patterns of development**

\textit{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?}

2.9 The allocation at Land north of A1, Skellow (ref: 165 /186) of which our client’s site forms part is served by bus services in both directions abutting the site.
along Crabgate Lane. The services provide a regular service to Doncaster.

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

2.10 Yes, our client’s site is in a sustainable location with easy access to public transport (as discussed above). The site also has excellent access to the cycle network. The site scores well across most of the assessment criteria within the sustainability appraisal (table 8.21 ref: CSD7.1).

2.11 The site is one of the few within Carcroft - Skellow within flood zone 1 and scores relatively well in relation to access to services these being within a 15 to 20-minute walkable distance of the site on Skellow Road.

2.12 It is also notable that our client’s other site Land at Mill Lane, Skellow (site reference: 185) also scores well against the sustainability appraisal criteria.

2.13 Carcroft and Skellow has an array of local services and facilities offering its population shopping, eating and drinking, healthcare, employment and education (primary) and leisure and sports opportunities. The town is served by good, frequent public transport service – there are numerous bus services operating from the town, linking to nearby villages and larger urban areas including Doncaster City Centre. Train services are accessible in the nearby town of Adwick le Street. Both sites have easy access to all of these services as identified on the sustainability maps below.
Map 1: Land north of A1, Skellow (ref: 165 /186)

Map 2: Land at Mill Lane, Skellow (site reference: 185)
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?

2.14 No, our client’s site Land north of A1 (ref: 165 /186), Skellow does not provide any strong Green Belt function. Within its Green Belt assessment (ref: DMBC3) the Council notes that the case for removal is moderately strong noting:

“The site would deliver a strong, well defined and likely to be permanent Green Belt boundary which would also round off the built form in this location. The site scores moderately strong for safeguarding the countryside from encroachment, moderately for assisting urban regeneration, but less strongly against other purposes”

It further goes on to conclude that:

“A number of sites have been submitted in the settlement, all of which are constrained by flood risk with the exception of site 165 / 186, which is also coincidentally the site most suitable for release in Green Belt terms. On balance, it is deemed that exceptional circumstances exist which justify the release of this site from the Green Belt, and in doing so, the settlement can deliver its housing requirement and local need locally on a site which will help round off the settlements built form, provide a strong Green Belt boundary and not be overly impactful in its removal on the purposes of the Green Belt. There is no alternative submitted to meeting the settlements housing target within Carcroft – Skellow, and furthermore, given the fact Green Belt surrounds the settlement and flood risk also covers much of the area, including land to the south, there are limited alternatives to the allocation of this site within Carcroft – Skellow.”

2.15 Our client broadly agrees with this analysis, however, it is worth noting that our client’s other interests at Land at Mill Lane, Skellow (site reference: 185) also performs well and is only excluded due to elements of the site being within flood risk zones 2/3. As demonstrated within the site promotion document¹ the

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¹ Appended to Matter 1 statement
majority of the site is located within Flood Zone 1 as identified by the Environment Agency Flood Map for Planning and is therefore considered to be at lowest risk of flooding. A small section of the southern part of the site is located within Flood Zones 2 and 3. Preliminary flood risk and drainage technical work for this site has found that there are drainage mechanisms and/or engineering solutions which would reduce or remove the risk of flood, alongside a sequential approach to steer residential development to the areas of lowest flood risk within the site. The site promotion document clearly demonstrates that all development can be accommodated in flood zone 1 on this site.

**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?**

2.16 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?**

2.17 The proposed allocation at Land north of A1, Skellow (ref: 186 /165) provides a natural extension to the settlement with a clear, robust and defensible boundary on all sides formed by the A1, Crabgate Lane, Green Lane and existing residential properties. There will be no need for further changes to the Green Belt boundary at this site.

2.18 The above is confirmed by the Council’s Green Belt assessment, which identifies the site has a strong boundary (DMBC3, page 63).

**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?

2.19 Whilst our client is willing to offset any negative impacts arising from the development this must be in accordance with paragraph 56 of the NPPF:

a) necessary to make the development acceptable in planning terms;
b) directly related to the development; and
c) fairly and reasonably related in scale and kind to the development.

2.20 The proposed changes to the plan are unclear as to the scope and scale of such mitigation and as such it is unclear if they would fulfil the above tests. Furthermore, given that there was a strong case for removing this site from the Green Belt mitigation is not considered necessary.

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?

2.21 Our client only wishes to respond in respect of Land north of A1, Skellow (ref: 186 /165). It is, however, clear given the Council’s assessment this is the most appropriate site within Carcroft – Skellow for development. Without this site the largest of the ‘Service Towns and Villages’ would not have any form of development over the plan period. This would have significant implications not only for the sustainability and vitality of the settlement but also neighbouring smaller settlements which rely upon Carcroft – Skellow for services and facilities.

2.22 Appendix PQ8 identifies the exceptional circumstances, our client agrees with the Council’s position in this respect.

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  The NPPF, para. 139 identifies that:

“...where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period”

2.25  The Council’s evidence in relation to the Green Belt Review (ref: SDEB15) whilst discussing safeguarded land does not provide any clear evidence that Green Belt boundaries will be retained in the long-term.

2.26  The Council’s Green Belt Topic Paper (section 3.3) highlights a number of potential reasons why it cannot be assured that future Green Belt releases will be necessary. Whilst these are noted the simple fact is that the majority of the larger settlements are sited within the Green Belt. There is, therefore, a high probability that safeguarded land will be required to preserve the longevity of Green Belt boundaries.

2.27  Given the high probability that changes to Green Belt boundaries will be required at the end of the plan period it is not considered justified to exclude such designations. Indeed, it is considered contrary to the NPPF and does not provide long-term certainty.

2.28  It is recommended that the Council seek to allocate safeguarded land in conformity with paragraph 139 of the NPPF. This should be provided in sustainable locations such as our clients site at Mill Lane, Skellow.