WRITTEN STATEMENT OF RESPONDENT: MR CHRISTOPHER OWEN IN RESPECT OF M6: HOUSING DEVELOPMENT REQUIREMENTS

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 Local Plan (“2019 Representation”).

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 Local 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.

Q6.1. Are the development requirements for the housing allocations without planning permission set out in Appendix 2 to the Plan justified? Is there sufficient detail to provide clarity to developers, local communities and other interested parties about the nature and scale of development proposed?

As set out in the 2018 and 2019 Representations, Site 350/407 should be removed from Appendix 2 as a site suitable for development.

However if Site 350/407 remains in Appendix 2 as allocated for development, changes to Appendix 2 need to be made to adequately set out the development requirements for this site.

Appendix 2 states “The Site Development Requirements set out various and specific requirements for the development of the allocated sites and identify any necessary additional work or studies that need to be undertaken or where specific developer contributions may be required. [emphasis added].”

The local community are extremely concerned that the Site Development Requirements relating to Site 350/407 set out in Appendix 2:

- do not adequately set out the nature and characteristics of the Site and the constraints on development;
- do not adequately set out the additional work or studies that need to be undertaken; and
do not adequately specify where development contributions may be required.

Such proposed changes that are necessary are set out below. The Inspector should note that many of these proposed changes are simply enshrining requirements set out in the Planning Brief for the Site drafted by DMBC\(^1\) into the Local Plan or including reference to issues noted during DMBC’s own sustainability appraisal/ site selection methodology appraisal.

<table>
<thead>
<tr>
<th>Appendix 2</th>
<th>Rationale for proposed changes</th>
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<td><strong>Archaeology</strong>: This site has a high potential for the survival of significant archaeological remains associated with Roman period pottery production and associated settlement, agriculture and pottery production, and there are major archaeological constraints associated with the suitability of this site for development. Given this evidence, further detailed consideration of the impact on these will be required to establish the site’s suitability for and capacity for development. A programme of archaeological evaluation (expected to be a combination of geophysical survey and trial trenching) will need to be discussed and agreed with the South Yorkshire Archaeology Service at an early stage and prior to any planning permissions being granted. It will be key that this evaluation is completed at the design stage. The evaluation will characterise the nature, extent and state of preservation of the archaeological remains present on the site and provide information to ensure the design minimises any impact upon significant archaeological areas. This evaluation will be fully funded by the developer. A Heritage Statement detailing how the results of the evaluation have informed the design of the scheme can then be submitted alongside any planning application. This Heritage Strategy will also</td>
<td>The Site Development Requirements fail to mention that there are “five monuments within the site .... all associated with Iron Age to Roman activity” and that there are “major archaeological constraints” regarding the “suitability of the site for allocation” of development (Doncaster Local Plan: Archaeological Scoping Assessment(^2)). The report also notes that “remains associated with the Roman pottery industry and associated settlement are part of a wider industrial and agricultural landscape within this area considered to be of Regional archaeological significance.” Further, as noted in my response to Q1.5, “significant negative effects” of development of the Site such that “there may be a major archaeological objection to the allocation of these sites” were noted in the sustainability appraisal/ site selection methodology appraisal.</td>
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\(^1\) [https://www.rightmove.co.uk/commercial-property-for-sale/property-70529618.html](https://www.rightmove.co.uk/commercial-property-for-sale/property-70529618.html)  
\(^2\) [https://dmbcwebstolive01.blob.core.windows.net/media/Default/Planning/Documents/Policy%20Monitoring/SA/Appendix%20-%20Sites%20350-399.pdf](https://dmbcwebstolive01.blob.core.windows.net/media/Default/Planning/Documents/Policy%20Monitoring/SA/Appendix%20-%20Sites%20350-399.pdf)
detail the proposed mitigation measures where less significant archaeological evidence will be impacted by the proposed scheme. The proposed mitigation will be designed to ensure that an understanding of the archaeological evidence affected is gained before that evidence is lost or damaged. Any such costs of mitigation will be fully funded by the developer.

**Biodiversity:** The woodland / Local Wildlife Site to the northern part of the site should be protected with a buffer zone of planting the existing habitat. Similarly the corridor along the railway line should be protected with a buffer zone of the existing habitat, could be enhanced with additional planting. The site has biodiversity value and forms part of a wider network of connected and biodiverse greenspaces. The design should maintain a significant proportion of the existing habitat to allow integration with the woodland/ Local Wildlife Site and the wildlife corridor running through the site. Any habitat which supports endangered, protected or at risk species should be maintained. Any habitat losses would need to be accounted for and would require full compensation from the developer and which should contribute to the quality of the ecological network. This could potentially be delivered via a biodiversity net gain approach, subject to assessment of the habitats being lost and availability of suitable receptor sites although given the biodiversity on the site, a detailed assessment and fully funded plan should be prepared to explain how the biodiversity net gain will be achieved and how lost habitats will be replaced.

A detailed wildlife assessment of the site must be performed at the design stage and prior to any planning permission being granted. This assessment will characterise the nature and extent of the wildlife on the site and will explain the impact on the wildlife, particularly in relation to endangered, protected or at risk species, and the biodiversity of the site should development take place, and

| Please see attached photographs at Appendix A which show the current habitat on the Site. |
| No explanation is given as to how practically “habitat losses would need to be accounted for and would require compensation, which should contribute to the quality of the ecological network.” It is totally unrealistic to destroy this site and then compensate for the habitat loss via a “biodiversity net gain approach, subject to assessment of the habitats being lost and availability of suitable receptor sites”. No explanation is given as to how it is at all feasible for there to be a “biodiversity net gain” from destroying the Site (which is adjacent to a LNR/SSSI and part of a Green Infrastructure corridor) and from how this “biodiversity net gain” will be achieved. |
| Should development on the site be potentially permitted, a detailed explanation of how the specified criteria will be achieved should be provided and independently reviewed prior to any development starting: this should be an absolute requirement of any development. |
| In addition, prior to any permission to develop the Site is granted, a detailed wildlife assessment of the Site should be performed to assess whether the Site is home to endangered or protected flora and fauna. Given the rich eco-diversity of the site and its location next to a LNR/SSSI, and the number of birds and animals living on the site, together with a host of wildflowers, it is highly likely that endangered or protected species are resident on the Site. |
how such impact will be compensated for. This assessment will also consider the impact on the adjacent Local Wildlife Site and the wildlife corridor running through the site, and how any such impact will be compensated. This wildlife assessment will be fully funded by the developer.

Any costs associated with protecting the adjacent Local Wildlife Sites and/or SSSI improvements and/or Wildlife Corridors, together with any improvements or protections necessary in relation to Red House Plantation will be fully funded by the developer.

**Design:** New development should connect to the Avenue. Existing informal footpath routes, desire lines and connections should be incorporated into the layout.

It will be a requirement that the three bridleways which serve the site are enhanced. There is currently a bridleway going diagonally from the junction with The Avenue and the bridleway between Rose Hill Rise and the plantation. The existing bridleway connecting the racecourse from the end of Rose Hill Rise (to the side of existing houses) will also need to be retained and improved.

Buildings should front toward the racecourse set back behind a soft landscaped edge. Sufficient separation should be maintained from the northern boundary to reduce overshadowing and impact on existing trees and to protect Red House Plantation, and from the eastern / southern boundary to minimise noise from the railway.

**Transport:** The site is potentially accessed through the existing Rose Hill Rise and The Avenue cul-de-sacs. A Transport Assessment & Travel Plan will be required. The existing local community should be fully involved and consulted regarding any such assessment and plan. Any such plan will be required to be produced and agreed prior to development commencing.

The Site contains existing bridle paths which are not mentioned in Appendix 2. These should be retained as part of any design.

The existing development adjacent to the site comprises around 180 dwellings. The access to the Site is via this development with only one exit, and two access roads in (due to one access road being one way). The existing road system will be totally unable to cope with an additional 166 dwellings, thereby effectively doubling the size of the development serviced by these roads. Given the location of the site (bounded on the
Section 6.6 of the disposal brief states that the concentration of outbound traffic at peak times is likely to result in excessive queuing on Rose Hill and potential unacceptable queuing and delays for motorists. The Transport Assessment will assess the operational capacity of the network and identify any measures required to mitigate against this. If the Transport Assessment and Travel Plan is unable to adequately mitigate the significant increase in traffic, pollution and noise, and the associated loss of amenity for the existing local residents, then development will not be permitted.

A residential travel plan will be required, and a routing agreement will be required during construction.

Any costs relating to any such assessments, plans or agreements, and any costs relating to changes required to the road system will be fully funded by the developer. In particular, any costs associated with changes required to the junctions of Rose Hill Rise and the Avenue with the A638 and any costs relating to changes required to other adjacent road systems will be fully funded by the developer.

To the extent that following development, any issues relating to traffic, loss of amenity, disruption, noise and pollution arise as a result of the development and which require further assessment and correction/changes to the road system or compensation will be fully funded by the developer.

**Trees and hedgerows:** The existing site boundaries include mixed species hedgerows with numerous mature trees within them. It will be a requirement of the development that these hedgerows and trees are retained and enhanced through additional and appropriate planting. Boundary oaks should be designed as per the design brief. Layout should be informed by a tree and full survey of the trees.
shrubs and other flora on the site. Any endangered, protected or at risk species will be protected in any development.

The woodland that borders the site will need to be protected and enhanced by the development. There will need to be a binding commitment to managing the woodland in the long term in order to offset the damage caused by additional visitor pressure from people living on the adjacent site, such commitment to be fully funded on an on-going basis by the developer.

**Other:** The site is located within 10m of a surface water body so there is potential for significant negative effects unless good practice construction techniques are employed to mitigate this, such as collection of site wastewater and appropriate choice for storage of construction materials/chemicals etc. on site for example. The means by which the potential significant negative effects will be mitigated will need to be discussed and agreed as part of the planning application before development starts.

As identified in the sustainability appraisal for the Site.

**Q6.12. Are the requirements in policies 27, 29 and 49 relating to the provision of green infrastructure and open space and the landscaping of housing developments justified and would they be effective?**

Policy 27 is justified and would be effective if it were appropriately applied – which it has not been in relation to the allocation of Site 350/407 for development.

Contrary to Policy 27 and NPP – which requires new development to protect, restore, maintain, create, enhance and extend green infrastructure and improve connectivity within the network - development of the Site will not achieve any of these policy aims since the Site is adjacent to an LNR/SSSI and is on and/or adjacent to the Sandal Beat/ Loversall Green and Bawtry Forest Infrastructure Corridors. Development of this Site will destroy rather than “protect, restore, maintain, create, enhance and extend” the green infrastructure network and will have an adverse impact on connectivity within the network.
Further, development on this Site will clearly not be sustainable as the destruction of the diverse natural environment on this Site cannot be compensated for by creation of open spaces elsewhere, or within the proposed development of the Site. The damage to the environment caused by development of this Site is severe and irreparable, especially given the site’s location.

With regard to other particular elements of the Inspector’s question:

a) The requirement in policy 27 part A for all major developments of 30 or more family dwellings to provide a green infrastructure masterplan which demonstrates how ten specified criteria will be met. Is the Council’s suggested change to apply the requirement to all sites of one hectare or more necessary to make the Plan sound and, if so, is it justified?

Development of Site 350/407 will not contribute toward green infrastructure and will breach the following criteria set out in Policy 27 part A:

2. creates or enhances green corridors, including rights of way. Development of the Site (which is on a wildlife corridor) will clearly not enhance the green corridor
3. provides specific and dedicated spaces for wildlife to encourage a more robust and connected network of habitats. Development of the Site will destroy a area rich in biodiversity and will not encourage a more robust or connected network of habitats for the reason noted in 2. Above.
4. considers tranquillity and provide for generous biodiversity rich open spaces. Development of the Site will reduce the current tranquillity of the Rose Hill Estate and destroy a biodiverse rich open space.
6. avoids loss or damage or deterioration to green infrastructure assets. As noted above, the opposite will be the case.
9. helps people and wildlife adapt to the impacts of climate change by including naturalised forms of flood storage and/or incorporating additional tree planting within developments. Development of the Site will do nothing to help people or wildlife adapt to the impact of climate change and will result in the destruction of many trees currently on the Site and which will not be replaced by additional tree planting.