Matter 4. Green Belt

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?

Whilst we support the use of brownfield sites, there is a great need for greenfield sites to be developed to achieve the Plan Strategy as it is important to acknowledge that the remaining previously developed / brownfield sites are limited and can have viability implications (e.g. costs linked with remedial works associated with contamination etc.). To meet the housing requirement proposed it was, and still is, considered vital to undertake the Green Belt Review to help meet development needs.

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

Our clients are longstanding landowners in Tickhill (identified as a Service Town and Village) and therefore our comments relate to the proposed allocation at Sunderland Street, Tickhill which is proposed to be removed from the Green Belt and allocated for 74 dwellings. Whilst we do not object in its entirety to this allocation, it is not considered that the Council have identified the most sustainable site to be deleted from the Green Belt for housing development.

As part of our response to the Doncaster Local Plan Regulation 19 Consultation, we prepared additional evidence in the form of a ‘Comparative Landscape and Green Belt Assessment’ which compares our client’s site at Wong Lane to the Regulation 19 Local Plan preferred site (Sunderland Street) in terms of Green Belt purposes. Please see Appendix A for ease of reference.

Tickhill has a housing requirement target of 165 units to meet its local housing need target as set out in Draft Policy 3. As stressed in our comments to Matter 2, these targets are minimums, not capped figures and therefore the Council should be seeking to strive for higher numbers to those identified in Policy 3 to ensure need and demand is met throughout the entire Borough over the full Plan period (and where Green Belt release is involved, endure beyond the Plan period in conformity with paragraph 136 of the NPPF).

As the Draft Plan currently stands, the target figure of 165 dwellings in Tickhill is proposed to be addressed by allocating a single site at ‘Sunderland Street’ for 74 units. As there are no commitments in the village, the Local Plan therefore proposes a shortfall of 91 units.

The Draft Local Plan (paragraph 16.237) states that: “As at 1st April 2018, there are no permissions large enough to allocate towards the town’s housing requirement (5+ units remaining) and only a single site, equating to 74 units, has been assessed through the Local Plan site selection methodology as being supportable for allocation. Other
sites were dismissed either due to importance to Green Belt purposes or problems with creating a safe and viable access, from a Highways Development Management perspective, given the very rural nature of some of the road network around the settlement. Some sites are ruled out for both of these reasons. The remainder of the settlement’s housing requirement of 165 new dwellings (91 units) has therefore been made good through allocated supply at the Doncaster Main Urban Area and some of the Main Towns in line with Policy 3, which adds any unmet local housing need from settlements to the economic-led housing growth uplift”.

We fundamentally disagree with the findings of the Local Plan and consider that it is unjustified and therefore unsound. Our client’s site at Wong Lane (HELAA Site 357) is preferable to the proposed site at Sunderland Street (HELAA site 1028). Our justification for this objection is based on work by landscape architects FPCR (Appendix A).

FPCR were commissioned to undertake an Appraisal of the site known as ‘Land at Wong Lane’, to consider its contribution to the five Purposes of Green Belt, as set out in the NPPF and, to assess what the implications would be on the new Green Belt boundary should the site be removed from the Green Belt. This Appraisal provides a commentary on the Doncaster Green Belt Review (ARUP), and undertakes a ‘sense check’ of the published results, using professional judgement to reach conclusions on the suitability of this site for Green Belt release. The appraisal also provides a comparison between Sunderland Street and Land at Wong Lane, in terms of their contribution to the Green Belt Purposes, and the strength of the resultant Green Belt boundary (should these sites be removed from Green Belt).

Whilst ARUP conclude that both sites have moderate strength in terms of Purposes, it is important to acknowledge that Sunderland Street scores higher in terms of its contribution to the five Purposes of Green Belt. The combined scores for Sunderland Street are 20 (with 2 purposes scoring 4 or above), while the combined score for Wong Lane is only 14 (with 1 purpose scoring 4 or above). This also goes against the conclusion of the Stage 1 Assessment, in which General Area ‘Tickhill 7’ (in which Sunderland Street is located) scored significantly higher than ‘Tickhill 2’ (in which Land off Wong Lane’ is located).

Development of Land off Wong Lane would not result in extending the existing settlement further north or west than currently defined by the development limits (or settlement boundary). As such, the development of this site would not lead to a reduction in the gap between Tickhill-Stainton and Tickhill-Wadworth, and would not therefore contribute to coalescence of settlements. In contrast, the development of Sunderland Street would result in a 5.38% reduction in the gap between Tickhill and Harworth.

In terms of Purpose 4 (preserving the setting and special character of historic towns), the contribution of Sunderland Street is slightly greater than Land off Wong Lane, given its proximity to Tickhill Castle, and potential for glimpsed views of the motte from the southern extent of the site.

Overall, Sunderland Street performs better than Land at Wong Lane in terms of contribution to Purposes of the Green Belt and as such the latter site should be considered first in terms of further site selection work. To ensure that the Local Plan is sound it needs to be compliant with the NPPF. The NPPF states at paragraph 133 that “the
**Government attaches great importance to Green Belts**. It is of great importance therefore that any amendments to the Green Belt are based on the best information/evidence and the proposed amendments are the best option available. As we have demonstrated above, this is not currently the case in respect of comparing our clients’ land to that of the proposed allocation. Furthermore, paragraph 138 states that the Local Planning Authority should also set out ways in which the “impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”. With this being the case, it should be incumbent on the Council to ensure that any release of land from the Green Belt has the least impact on the Green Belt to start with. Our client site is manifestly better in all these respects and the ARUP work and FPCR work undertaken confirms this.

Additionally, it is considered that the Local Plan’s proposal to under-allocate sites in Tickhill and to “make good” through the allocated supply in other towns is not an effective policy choice. It does not ensure that the vitality of Tickhill is maintained (as required by NPPF paragraph 78) and risks undermining local services such as the primary school and shops in the Tickhill. Either of our clients sites, as set out below, could accommodate more dwellings (circa 90 or 150 dwellings per site respectively) if allocated than that of the Sunderland Street allocation (74 dwellings) and would therefore serve to address the objectively assessed housing need of the Service Town and Village better than is currently proposed.

When considering the overall housing need for Tickhill it is considered that our client’s land at Wong Lane could be allocated alongside the current proposed allocation to meet the overall minimum need for the Service Town and Village of 165 dwellings over the plan period.

Please note that our client has the following sites in Tickhill which are suitable, available and achievable and should be allocated for housing as part of the Doncaster emerging Local Plan:

1. “Land off Wong Lane, Tickhill” – HELAA Site 357 - it is considered that the site could accommodate circa 90 new dwellings over the Plan period;
2. “Land off Lindrick Lane, Tickhill” – HELAA Site 356 - it is considered that the site could accommodate circa 150 new dwellings.

In conclusion, to ensure that the Draft Local Plan can be found sound, further consideration needed to be given to housing allocations in Tickhill to ensure that housing allocations meet the identified housing need (positively prepared) as well as any land deleted from the Green Belt needs to comply with the requirements set out in the NPPF to ensure that the Plan is ‘consistent with national policy’.

**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?

Please see our comments to Question Q.4.3 above for details on this matter.
**Green Belt boundaries**

**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?**

By preparing a plan which seeks to revise the Green Belt boundary, the Council has accepted that exceptional circumstances exist. We therefore support the Council's decision to review the Green Belt and make necessary amendments as part of the Plan making process.

Referring back to our comments to Matters 2 and 3, it is essential the Council seek to meet (if not exceed) the identified objectively assessed housing need of 920 dwellings per annum. As there is a need to remove land from the Green Belt to meet the identified need (which appears to be based on a range of housing requirements (i.e. (20 x 585) to 18,400 (20 x 920) dwellings as highlighted by the Inspector in respect of question 2.4), it could lead to the Council not being able to exceed the bottom of the range housing requirements due to existing development restrictions associated with Green Belt which has led to the Green Belt Review and the release of eight sites in the first place.

As set out in the Council’s response to the Preliminary Questions, even with Green Belt release, the allocations for Tickhill is still under the housing target of 165 dwellings by at least 91 dwellings if the Council were to remove the cap from the target as set out to our comments to Matter 2.

In short, we question whether the Council has allocated enough sites to ensure that housing need and demand is met over the plan period and has enough land been deleted from the Green Belt to assist this? We do not think so based on the below table:
Given that the above listed areas are already having their housing requirements in this plan period ‘constrained’ to take account Green Belt, it is clear that this Local Plan is unsound in its approach to assessing the long-term demographic and social needs of these areas.

Only limited account has been taken of future market or affordable housing needs in these areas or how affordable housing will be delivered without market subsidy by the very limited number of ‘Reserve Development Sites’ set out in Policy 6. Even then, the Council acknowledge at paragraph 4.82 of the Draft Plan that the Reserve Sites are not guaranteed to be deliverable. The Draft Plan states that “these are sites where there is currently doubt about whether they could be developed in the plan period, due to HS2 Safeguarding Route, and/or where allocation cannot be justified in accordance with a sequential approach to addressing flood risk”. As such, if an early Review is needed then these Reserve Site may not be able to address any potential shortfall meaning that the Plan (including Green Belt Review) will need to be altered again to address these shortfalls.

As such, the Council’s Local Plan would be inconsistent with national policy (paragraph 139 of the NPPF) and therefore unsound without additional allocations or safeguarded / reserve sites to protect the permanence of the Green Belt and ensure the viability of main settlements and village in the future. Additional allocations and / or reserve sites would add flexibility to the Local Plan as reserve sites could be released at the five-yearly plan review stage (or earlier if needed through appropriate Plan monitoring such as the 5 year housing land supply exercises) to ensure greater certainty in delivering the housing requirement across the next plan period and beyond.

Please see our comments to Q4.10 for further details on this matter.

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?

As per our comments to Question Q4.3, it is our view that the proposed allocation at Tickhill (Sunderland Street) performs better than Land at Wong Lane in terms of contribution to Purposes of the Green Belt and as such the latter site should be considered first in terms of further site selection work regarding deletion from the Green Belt and allocations.

To ensure that the Local Plan is sound it needs to be compliant with the NPPF. The NPPF states at paragraph 133 that “the Government attaches great importance to Green Belts”. It is of great importance therefore that any amendments to the Green Belt are based on the best information / evidence provided and the proposed amendments are the best option available.

As we have demonstrated above, this is not currently the case in respect of comparing our clients land to that of the proposed Tickhill allocation. Paragraph 138 states that the Local Planning Authority should also set out ways in
which the “impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”. With this being the case, it should be incumbent on the Council to ensure that any release of land from the Green Belt has the least impact on the Green Belt to start with. Our client site is manifestly better in all these respects and the ARUP work and FPCR work undertaken confirms this.

As our client is a longstanding major landowner in the Borough, they are in a position to offset any Green Belt deletions through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land in their ownership.

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?

As set out above, it is considered that Table PQ8 from the Doncaster Council Response to Preliminary Questions - 2nd June 2020 (page 12) shows that without allocating Green Belt sites, some settlements cannot meet their housing targets. Allocating Green Belt land helps a number of areas reach targets but it is our view that not enough has been done to meet all needs across the Borough – particularly in Tickhill.

As per paragraph 136 of the NPPF, once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. It is not considered that the proposed changes to the Green Belt boundary will endure beyond the plan period based on the identified housing land requirement (especially when taking into consideration that this should be a minimum – not a cap).

Additionally, the MHCLG consultation paper ‘Changes to the current planning system’ proposes a revised Standard Method for calculating Local Housing Need which sets out that Doncaster should have a revised figure of 961 dpa as the minimum LHN need (higher than the currently proposed 920 dpa as currently proposed in the Draft Plan). We appreciate the planning reforms are yet to take full effect but this is another example that illustrates the proposed need and demand across the Borough which would require further amendments to the Green Belt boundary to ensure it will endure beyond the plan period.

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?

As previously stated, even with Green Belt release, the allocations for Service Town and Village of Tickhill is still under the minimum housing target of 165 dwellings if we were to remove the cap from the target as set out to our comments to Matter 2.
Whilst we therefore consider that exceptional circumstances to justify making the changes to the Green Belt referred to in the Council’s response to PQ8 been fully evidenced and justified, our concern is that the Council has not gone far enough with the Green Belt changes.

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?

As per our comments to Questions Q4.6, Q4.8 and Q4.9, our concern is that the Council has not gone far enough with regard to the changes proposed to the Green Belt. It is not considered that the proposed changes to the Green Belt boundary will endure beyond the plan period based on the identified housing land requirement (especially when taking into consideration that this should be a minimum – not a cap).

As per paragraph 136 of the NPPF, any changes to Green Belt boundaries need to have regard to their intended permanence in the long term, so they can endure beyond the plan period.

Based on our comments above and the appended justification (Appendix A), it is proposed further allocations are needed at Tickhill to help meet the OAHN proposed for the Service Town and Village of Tickhill. We therefore propose to ensure the strategic objectives of the Draft Plan are met, our client’s land at Tickhill is allocated for housing as part of the Draft Local Plan. We would be happy to discuss details associated with the proposed additional allocation at Tickhill with the Inspector and Council if deemed necessary.
Matter 4 - Appendix A – FPCR Landscape Report