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:

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

Yes, it is considered that non-Green Belt locations were fully examined.

The consequences for sustainable development of not releasing Green Belt land to meet housing requirements would be damaging, as it would either deliver growth in unsustainable locations, that are not meeting local needs or it would not be delivering the growth that is required to meet the identified housing requirement of the Borough as a whole and that would be unsustainable and contrary to national policy.

**Housing Needs**

First and foremost, it is crucial for the Local Plan to meet the identified housing needs. This is clear in paragraph 59 of the NPPF 'To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed'. The Council has identified the Housing requirement and that will be tested at the EiP. The Council has also explored all brownfield sites for development and that will also be tested at the EiP. This case is set out in the Council’s Green Belt Topic Paper and, subject to these being ratified, this is the first exceptional circumstance to release Green Belt land.

The second consideration is to identify a sustainable strategy for providing new homes. The final consideration is to identify whether there is suitable land, within accord with the spatial strategy, in the Green Belt that could be released having regard to the five purposes of Green Belt. These are addressed below.

**Spatial Strategy**

When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

As stated under Matter 3, it is considered that the broad spatial distribution approach is Justified as, for sustainability reasons, it is appropriate to seek to accommodate significant proportion of growth in and around the main urban areas and towns where there is good access to public transport and services. However, in addition, it is also important to seek to support the service towns and villages where a housing need has been identified and they can accommodate the growth that would support and bolster local services, many of which are in decline in rural areas. These Service Towns and Villages have been selected by the Council because:
“These settlements serve as important local centres, with a sustainable level of provision to support themselves and other small settlements which are close by, and therefore can accommodate a small amount of housing growth within them”.

Paragraph 59 of the NPPF confirms that to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount of land can come forward where it is needed. The Council has identified a need to deliver new homes at the service towns and villages and the Plan can only be Sound if the Local Plan achieves that, by identifying sufficient sites.

Further, paragraph 77 of the NPPF is clear that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. This is not achieved at Tickhill.

In paragraph 1.2.8 of the Housing Topic Paper, the Council identify that ‘a challenge for the Local Plan is to ensure there is a good spread of housing across the Borough and to the places it is needed, in a way which is in-keeping with, and proportionate to, the settlements themselves’. The Topic Paper (4.3.4) goes on to recognise that the Local Plan has sought to allocate as much land as possible in the places it is required by utilising as many brownfield and urban opportunities as possible (see section 7). ‘In a number of locations, this has failed to deliver a suitable amount of housing to help meet respective settlement housing requirements, given how tightly drawn the Green Belt is’.

The significance and necessity of Green Belt land release is correctly recognised by the Council in paragraph 7.9.4 of the Housing Topic Paper where it is stated that:

“In these settlements, supply via permissions is either more limited or there are no permissions to count towards the allocated supply (Sprotbrough and Tickhill), which makes finding new site allocations imperative if housing is to be delivered in the locations set out in the settlement hierarchy, in the interest of meeting local needs and providing a balanced spatial approach”.

Green Belt Assessment
The Council has undertaken an extensive Green Belt assessment to assess how sites meet the five purposes of the Green Belt and the relative strength of proposed boundaries. However, it is considered that undue weight has been given to existing boundaries when these could be strengthened, if appropriate, prior to and during development.

By way of an example, the Council have ruled out sites at Tickhill, a settlement where there are insufficient allocations to the meet the proposed spatial strategy and local housing needs, when there is land that is identified as performing ‘weakly’ in terms of the Green Belt purposes, but with a ‘weak’ boundary. This is contested but, in any event, it could be strengthened which is agreed by the Council where they confirm, in the response to the Inspector’s preliminary questions: “The Council agrees that creating more readily recognisable Green Belt boundaries should be more strongly set out within the developer requirements”.

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?

Yes, there are reasons why further land should be released from the Green Belt. Paragraph 136 of the NPPF is clear that 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. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

As changes are being made to the Green belt boundaries, this should be a far-ranging exercise. For reasons outlined above, land around Tickhill should be released from the Green Belt to allow the settlement to grow and be sustained now and in the future. The Council acknowledge that there is a local housing requirement that should be met and that this is a sustainable location to accommodate growth.

To completely lock Tickhill into a future with no growth opportunities would be, as the Local plan recognises, an unsustainable outcome. The Council clearly state in paragraph 7.9.4 of the Housing Topic Paper:

“In these settlements, supply via permissions is either more limited or there are no permissions to count towards the allocated supply (Sprotbrough and Tickhill), which makes finding new site allocations imperative if housing is to be delivered in the locations set out in the settlement hierarchy, in the interest of meeting local needs and providing a balanced spatial approach”.

To achieve this, land must be released from the Green Belt around Tickhill. However, a number of sites (to the south of Tickhill) identified in the Green Belt Assessment as being suitable for Green Belt release, as they perform weakly in terms of the five purposes (Green Belt Topic Paper, page 87), have been dismissed on ‘access’ grounds. There is no evidence to justify this, no evidence of the testing of options and alternatives and no liaison with the land owners to seek to find a solution to meet the ‘imperative’ of finding new allocations to meet the housing needs of Tickhill.

It is considered that there are very sound reasons why Tickhill should be given the scope to expand at locations where there is not considered to be harm to the purposes of including the land within the Green Belt. Any forthcoming development proposals would clearly need to demonstrate, at the detailed application stage, that there was a safe access and that boundaries could be strengthened. In the Council’s response to the Inspector’s preliminary questions it is confirmed that: “The Council agrees that creating more readily recognisable Green Belt boundaries should be more strongly set out within the developer requirements”.

Further, in paragraph 3.3.41 of the Green Belt Topic Paper it is noted that “The Council feel these would be otherwise suitable sites, and therefore have allocated these as ‘Reserve Development Sites’ to give them a status as sites that are preferred for development subject to constraints being overcome”. It is considered that a solution to an access ‘problem’ is more like to be found for a site in the vicinity of a sustainable settlement than, potentially, a site that floods. The approach of the Local Plan is not consistent in relation to why other sites in similar circumstances (with a constraint) could not be ‘Reserve Development Sites’, particularly, for example, close to settlements where a real need for more housing has been identified and cannot be found (eg Tickhill).