Doncaster Local Plan Examination
Theakston Estates Limited (ID 01937)
Matter 4 Statement - Green Belt

Issued September 2020

1.1 This Hearing Statement has been prepared on behalf of our client (Theakston Estates Limited) (ID 01937). Our client responds to Questions Q4.2, Q4.7 and Q4.10 only.

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?

1.2 This question relates to the requirements of NPPF paragraph 138 which sets out the need to promote sustainable patterns of development. Paragraph 138 also requires policy-making authorities to consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards town and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

1.3 The Plan clearly establishes that the Main Urban Area (inside the Green Belt boundary) is the most sustainable location for development so it is unclear why only two out of the eight proposed Green Belt released allocations relate to the Main Urban Area (MUA). As the Plan currently fails to identify enough land within the MUA to meet the requirement to deliver at least 50% of housing growth in this area of the Borough, exceptional circumstances are justified to remove additional land from the Green Belt in the MUA in order to deliver the spatial strategy.

1.4 It is considered that additional land should be removed inner boundary of the Green Belt, in the MUA, in order to satisfy the requirements of NPPF paragraph 138.

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?

1.5 Whilst this is a question for the Council to respond to, it should be recognised that our client has control of land immediately to the west of the site being promoted for release from the Green Belt (ref. 436). The additional land within our client’s control extends to around 33 hectares and forms part of the proposed development in that it would comprise a new community parkland providing new planting to enhance biodiversity whilst also incorporate opportunities for sport.

1 Please refer to our response to Q3.2 (Matter 3 Statement)
and recreation. An indicative masterplan for the site (ref. 436) and adjoining land was attached to our representations at the Regulation 19 stages although enclose a copy for ease of reference.

1.6 If the Inspector agrees with us that additional land is needed in the MUA to deliver the Plan’s distribution of development on suitable sites, the land within our client’s control could offset the impact of removing the site (ref. 436) from the Green Belt and secure compensatory improvements to the environmental quality and accessibility of remaining Green Belt land, in line with NPPF paragraph 138.

**Exceptional circumstances for changes to the Green Belt**

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?

1.7 As set out in our Matter 3 statement (Q3.2), sufficient land has not been identified in the Main Urban Area to achieve at least 50% of new homes in this area of the Borough. It is essential that this is met in order to deliver the spatial strategy, support the economic strategy and deliver sustainable development.

1.8 In terms of the spatial distribution development it is recognised that the Council’s housing land supply is predominantly comprised by sites with planning permission. Table 1 below shows the completions over the last 5 years and proportion of this supply being delivering in the MUA.

<table>
<thead>
<tr>
<th>Year</th>
<th>Borough Total</th>
<th>MUA Total</th>
<th>MUA %</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015/16</td>
<td>1,025</td>
<td>459</td>
<td>44.8%</td>
</tr>
<tr>
<td>2016/17</td>
<td>1,049</td>
<td>555</td>
<td>52.9%</td>
</tr>
<tr>
<td>2017/18</td>
<td>1,137</td>
<td>426</td>
<td>37.5%</td>
</tr>
<tr>
<td>2018/19</td>
<td>1,189</td>
<td>368</td>
<td>31.0%</td>
</tr>
<tr>
<td>Total</td>
<td>4,400</td>
<td>1,808</td>
<td>41.1%</td>
</tr>
</tbody>
</table>

Source: DMBC Residential Land Availability Reports

1.9 Table 1 shows that there has been a substantial shortfall of completions in the MUA with an average of 41.1% being in this area. Indeed, the proportion of completions in the MUA exceeded 50% in just one of the years (2016/17) and in the most recent year of monitoring, the proportion was just 31.0%.

1.10 There is currently an imbalance in delivery when compared with where the Plan is looking to direct development towards. This is also resulting in a pattern of development which is less sustainable than the one intended with knock on implications such as greater travel requirements.

1.11 There is an identified need to achieve a step change and allocate more homes in the MUA to avoid the Plan failing to achieve its objection and policy requirement to deliver the majority of new homes in this area.
Furthermore, and as detailed in our Matter 1 and 5 Statements, there is significant concern for the over reliance on sites located within Flood Zones and specific concerns for the deliverability of certain sites.

The NPPF requires development to be directed away from areas at highest risk of flooding (paragraph 155) and it also requires plans to fully consider the future impacts of climate change so as to avoid flood risk to people and property (paragraph 157).

Around 44% of land within the local authority boundary falls within Flood Zones 2 and/or 3 and a similar amount (circa 41%) of the Borough is covered by the Green Belt designation. Whilst both designations present constraints to development it must be recognised that the Green Belt designation is a planning policy designation rather than a physical constraint whereby directing development towards areas at a higher risk of flooding poses serious safety issues.

It is relevant context that the former Doncaster LPD Sites and Policies DPD (June 2014) was withdrawn following the Inspector’s conclusions relating to an over reliance on sites at risk of flooding.

Following the examination of the Doncaster LDP Site and Policies DPD, the Inspector stated:

“46. In my opinion the Council’s approach to the selection of sites in areas of higher probability of flooding has been too inflexible. It has not given due consideration to the alternatives of developing in the countryside or even in the Green Belt in order to avoid making allocations in areas of flood risk. Overall, I do not consider that the Council has made a proper and thorough examination of the issue of flooding before deciding that the risks involved are outweighed.”

As currently drafted, it is considered that the Plan repeats similar mistakes as those made with the DPD.

In summary, we consider that exceptional circumstances are justified to release additional land from the Green Belt for the following reasons:

- To ensure the Plan’s objective to direct the majority of new homes to the MUA is achieved.
- To deliver the economic strategy is realised which is based on the premise of directing development to the MUA.
- To direct development to areas at a lower risk of flooding as required by national planning policy (NPPF paragraphs 155 and 158).

Word Count: 1,021