Thank you for the opportunity to comment on the Plan. I have attempted to answer the Inspectors questions, suggested alternatives and commented on the proposed developments in Skellow and Carcroft (Sites 165 and 186) where the Plan is unsound. An annotated satellite map for Skellow and Carcroft is attached to assist in the understanding of the comments made. I am available to the Inspector if he requires clarification on these comments.

The majority of submissions are from professional planners appointed by those who have significant financial interest in the development of Green Belt plots. I contribute as a local resident who wishes to minimise destruction of the environment so it is available for future generations. The proposed changes to the planning process will limit the ability to object and it is essential that individuals are heard at this time. I trust my written comments will be equally considered as those from commercial entities.

Q4.1a. No. Suggested underused sites in Skellow and Carcroft are:

- The waste tip of Bullcroft Colliery. This area has been recontoured, grassed and sparsely planted. The area is currently used as open space but not heavily used by the residents. Recontouring of this site would provide land for up to 100 houses and leave a significant area of green space.
- Site 398 off Owston Road, Carcroft. Included in the Plan as a reserve development for 93 houses. This area is currently scrub land. It was listed as a reserve site because of potential flood risk. If flood risk can be resolved to allow inclusion as reserve site there is little reason why it cannot be a priority site, allowing Grade 2 agricultural land to be retained at Plots 165 and 186. Flood risk can be mitigated by building design. This questions why the adjacent Site 273 was rejected at planning stage. These two sites could accommodate the proposed 300 houses for Skellow and Carcroft.
- Following the development of football pitches on land adjacent to Owston School; those at Bullcroft Memorial Park and off Crossfield Lane are no longer used. These green spaces, owned by DMBC, are currently underused. Small scale road front infill could be carried out providing land for up to 40 houses leaving sufficient green space.
- Sites for potential small-scale infill developments are available at:
  - Junction of Skellow Road and High Street, previously site of the Moon Inn.
  - Junction of Skellow Road and High Street, previously site of Tudor Auction Rooms.
  - Land adjacent to Central Garage, High Street.
  - Land opposite The Redmond Centre, High Street.
  - Derelict land off Lodge Road, previously occupied by a care home.
  - Road front at Chestnut Avenue, Bullcroft Memorial Park.
  - Sunneyfields View and Repton Road.
  - Mill lane. Unused barn and storage area.
  - Mill Lane, Bellerby Place and Bellerby Road, infill to road frontage of green space.
  - Saint Georges Catholic Church. Closed currently for sale.
Previous Methodist Chapel, Skellow Road.

It is possible some of these sites have permission for development.

The advantages of the above sites are outlined in answers to the Inspectors questions. These sites are less attractive to developers who want “easy” green field sites (Sites 165 and 186 for example) with minimal build cost. It is these sites they have financially committed to and have promoted during Plan consultation.

Q4.1b. The Plan does not make effective use of land in the Skellow and Carcroft Area. It does not make use of previously developed and underused sites (NPPF, Section 11, Paragraphs 117 and 118c and d), see Q4.1a above. DMBC have not considered the use of sites in public ownership (NPPF, Section 11, Paragraph 119), see Q4.1a. The proposed development of Sites 165 and 186 will not maintain the areas prevailing character (NPPF Section 11, Paragraph 122d). These sites fall within National Character Area 30 - Southern Magnesium Limestone. The development of these sites would be detrimental to the views of the protected Magnesium Limestone landscape and would cause harm to the green belt (NPPF Section 13 Paragraph 144). Sites 165 and 186 are adjacent to the A1 and noise and exhaust pollution will have a detrimental effect on the health of residents (NPPF Section 11, Paragraph 122e). Other rejected sites (398, 273, 185) and alternative sites suggested in Q4.1a are away from the A1 minimising pollution health effects. The existing infrastructure at sites 165 and 186 (especially roads) are insufficient to accommodate an additional 300 houses and the locations do not promote sustainable travel that limit the use of cars (NPPF Section 11, Paragraph 122c). Though buses are available, most journeys would be made by car to access services, schools and medical facilities which are up to a 30-minute walk. Rejected Sites 398, 275 and 185 are all within 5 minutes walking time of local primary schools. The alternative sites suggested in Q4.1a, especially the ex Bullcroft Colliery, and Sites 273 and 398, are close to the local shops, services, and employment areas are within easy walking distance. The Plan proposes to construct a Link Road from A1M Redhouse to the A19 Bentley Moor Lane. The development of the Bullcroft Colliery site could be serviced by construction of a short access road into this link. This would give direct access from the majority of areas listed in Q4.1a above, reducing the impact of increased traffic volumes on Skellow Road and the surrounding areas. Development of Sites 273 and 398 would give access to the A19 again reducing traffic on Skellow Road.

The proposed alternative developments (see Q4.1a) are within 10 minutes walking distance of Adwick station which gives direct access to Doncaster, Sheffield and Leeds. Sites 165 and 186 are 35 minutes’ walk to this railway link.

Q4.1c. NPPF Section 2, Paragraph 7 states the objective of sustainable development is not to compromise the ability of future generations to meet their own needs. The development of land within the green belt compromises the choice of future generations whose views may be very different from the current generation. NPPF Section 2, paragraph 8 gives three objectives of sustainable development and comments on whether the proposed Plan meet these objectives in non-Green Belt locations are given below:

- Economic. See Q4.1b about the development of the site at the ex Bullcroft Colliery which would coordinate with the proposed A1/A19 link road.
- Social Objectives. See Q4.1b about pollution of Sites 165 and 186 from the A1 which will not promote healthy communities. Alternatives sites with lower health risks are suggested in Q4.1a and Q4.1b. These alternative sites are also within walking distance of services which
promote healthier living. The selection of Sites 165 and 186 would require driving to most services.

- Environmental objective. The development of Sites 165 and 186 does not contribute to protecting and enhancing our natural environment, improve biodiversity, mitigate and adapt to climate change including adapting to a low carbon economy. The alternative sites listed in Q4.1a are more able to satisfy this objective for the reasons given in Q4.1b.

Q4.1d. Unable to comment.

Q4.2. No. All Sites considered during Plan development for Skellow and Carcroft are equally served by buses. Rejected sites 273 and 398 are within a 10-minute walk of Adwick Station compared to 35 minutes for selected sites 165 and 186. Alternative sites, see Q4.1a, for example Bullcroft Colliery, are much better served by public transport, see Q4.1b above.

Q4.3. No. See Q4.1b and c. DMBC have failed to consider the environmental, social and economic sustainability of the proposed 8 developments and failed to channel them into the current urban areas inside the green belt boundary (NPPF Section 13, 138). Demise of retail outlets and office-based work has accelerated due to Covid 19 and Doncaster town center will be increasing irrelevant as a shopping area with out of town shopping providing free parking. DMBC should see the Plan as an opportunity to redefine the town center as a residential area with service shops and support amenities. Significant development space is available on upper floors of buildings which are used for retail at ground level. This space could be utilised for singletons or couples without children who want town center living. Street level car parks in the town center should be used for residential development. Town center car parking should be minimised to encourage use of the Park and Ride facilities. The above would meet the requirements of NPPF Section 2 Paragraph 8c and in addition protect the green belt for future generations (NPPF Section 2 Paragraph 7).

Q4.4. The use of sites in the Green Belt causes encroachment of urban development on land which has never been developed. If these Sites are selected it questions the principle of Green Belt and whether the countryside is protected by legislation and whether the Green Belt will be at risk when this Plan expires. As discussed in Q4.1 the inclusion of Green Belt sites within the Plan does not address the issue of recycling previously used land, underused land and small-scale infill developments. The development sites proposed in the Plan have been selected on minimal cost, attractiveness to developers and the financial commitments of landbank speculators.

Q4.5 and Q4.6. DMBCs response to PQ10 contains no substance. Regarding Sites 165 and 186 the surrounding Green Belt is agricultural with minimal public access. Compensatory improvements at Rossington would have no effect on the quality of life of local residents who will be significantly affected by development of Sites 165 and 186. The compensatory requirements should be detailed for each Green Belt site. Suggestions for Sites 165 and 186 are:

- Public Rights of Way to be established at Ea Beck and Skel Brook to provide circular walks with the construction of bridges over water courses. This area is used for walking without access rights.
- Footbridge across the existing A1 from Sites 165 and 186 to link into the footpath on the west side of the A1.
- Establish Public Right of Way north from Sites 165 and 186 through agricultural land to Robin Hoods Well and construct a footbridge across the existing A1 to link into the footpath to Skelbrooke.
The Plan and the DMBC Doncaster Green Belt Review, Stage 3 state the A1, on the western boundary of Sites 165 and 186, will form a permanent and fixed boundary to a revised Green Belt. This is incorrect. It does not consider the proposed improvement of the A1 to motorway standard which will be located about 200m to the west of the existing A1. Once construction is approved land speculators will purchase sites and DMBC will request further changes to the Green Belt boundary to permit development up to the realigned A1/A1M.

Q4.7. The Councils response to PQ 9 and 10 is formulaic and vague on the compensatory actions if Green Belt sites are developed at Conisborough, Harlington, and Skellow and Carcroft. DMBC contend that that NPPF Section 13 (Paragraph 138) does not state that improvements to the Green Belt should be local to the land removed. This contradicts the objectives of NPPF Section 2, Paragraph 8b. What use is compensatory land at Rossington, some 10 miles away, to the residents of Skellow and Carcroft. This is environmentally unsustainable as it encourages driving rather than walking or cycling in the immediate vicinity (NPPF, Section 2 Paragraph 8c).

The proposed t Rossington Colliery Park was agreed in 2012 when waste tip reworking commenced. DMBC gave permission for the development of the Park in 2017, this is therefore not new compensatory land. The proposed Rossington compensatory area is sandwiched between the village of Rossington, the M18 and the Amazon development to the west. It is convenient to designate as Green belt but it is not preserving land untouched by previous development and natural landscapes and is not a direct replacement for the eight sites to be removed from the Green Belt.

In DMBC’s response to PQ9 the last sentence of the next to last paragraph states “initial work has been undertaken to identify potential sites and interventions which might form compensatory improvements, and further details can be provided”. The sites identified and the proposed improvements should be detailed in the Plan so the Inspector can assess if proper local compensatory improvements are to be made or whether these are just empty words. See suggestion in Q4.5 and 6 above.

Q4.8. No. See answer to Q4.1 above. In addition, the Doncaster Green Belt, Stage 3 Appraisal which reviewed all proposed sites at the Plan development stage appers to have been prepared so that predetermined sites have received favourable scores. The scoring is partially based on the suitability of a site to provide smoothing to the existing urban development. For example, Sites 165 and 186 at Skellow and Carcroft have been selected over Sites 185 and 398 on the ability of these sites to infill and smooth out the lines of the current development. Why do we need smooth lines to urban development? Site 185 has also been rejected on flood risk, however only about 15% of the area has a low flood risk which can be mitigated by leaving these as green spaces. Green space would also be required at Sites 165 and 186 to provide noise and pollution barrier from the adjacent A1. Sites 273 and 398 are also rejected on flood risk but Site 398 is a reserve site, see comments made against Q4.1a. Sites 185, 273 and 398 are more environmentally sustainable than Sites 165 and 186 being within easy walking distance of the local primary schools and other services. The conclusion is that commercial interests have contributed to the selection of Sites 165 and 186. It is noted that the commercial body which has recently purchased Site 186 also owns Site 185 and is lobbying to include this site in the Plan. No such lobbying is occurring to elevate Site 398 to a full development site from reserve status or to include adjacent Site 273 in the Plan.

Q4.9. No. DMBC have not answered PQ8 asked by the Inspector. They have not provided the bullet point summary of the exceptional circumstance’s requested. The inability of DMBC to provide a bullet point list for the eight sites indicates they have insufficient evidence to justify exceptional circumstances for removing these sites from the Green Belt. As stated in the answer to other questions
it is considered the site selection process, backup surveys and appraisals have been skewed so that sites which are of low development cost, backed by large commercial entities, and land bank speculators have been chosen with little regard for environmental sustainability or the effects on local residents, communities, traffic volumes and educational and medical services (required by NPPF Section 2, Paragraph 8). DMBC should provide the information in the format requested by the Inspector, justify the exceptional circumstances and explain, in detail, why these sites have been chosen over others which would minimize green belt impact.

The table provided by DMBC in PQ8 may contain an error. The Plan includes Site 165 and the adjacent Site 186 development in the Skellow and Carcroft area.

Q4.10. No. The removal of land from the Green Belt begs the question why bother with a Green Belt Policy if we are just going to remove land from its protection every 15 or 20 years when a review of future development is carried out by the Local Authority. Nobody knows what the economic and environmental climate will be in 15 years. For example, the demise of the retail sector could result in additional town center sites becoming available for development and out of town shopping centers may decline and close making these sites available. Similar arguments apply to industrial areas which may become derelict. If additional Green Belt land is released by this Plan the temptation for DMBC will be to develop these areas within the 15 year period requiring further virgin land to be released in 2035. The release of additional land will also only encourage land bank speculators to purchase these areas at a premium leading to pressure exerted on DMBC to approve development before 2035 so the speculators can liquidate their asset value.

Q4.11. Policy 2 gives a list of “Service Towns and Villages” and “Defined Villages”. Does policy 2 Part 6 apply to Defined Villages only or to the Service Towns and Villages as well? Infill development has no formal planning definition however it is widely considered as “the infilling of a small gap within an otherwise built up frontage or group of houses”. The maximum width of the gaps should be less than 20m. Section 13 of NPPF (Paragraph 145e) states limited infilling in villages is appropriate in the Green Belt. The use of the word Villages in those development areas defined as Service Towns and Villages questions whether the proposed large-scale residential developments in the 8 sites in the green belt are appropriate under Paragraph 145e. I would suggest that these 8 residential developments are not appropriate under Policy 2 Part 6 and therefore they should be removed from the Plan.

Additional Comment. An objection at Draft Plan stage was whether the number of additional residential properties at Skellow and Carcroft could be justified by predicted population growth. Table 6 of Policy 6 states 13235 additional properties are required between 2018 and 2033. The Plan states that 10 % (1324) will be in the Service Towns and Villages. The Table in PQ8 shows Skellow and Carcroft taking 300 (23%) of 1324. The 1324 should be spread equally between all the Service Towns and Villages with some adjustment for the population of each. This system of allocation would distribute the burden on local medical, school and transport services (both public and private) equally around the borough, reflect the housing needs of local populations and minimise development in Green Belt.


Word Count 2959.