Reference Number 03259 and 03453

Matter 4  Green Belt

Submissions on behalf of

Mr G Turnbull
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We act for Mr W Turnbull of Skellow Grange, who is part landowner of the following sites

- Site ref 164/130 Warning Tongue Lane Doncaster
- Site ref 165/186 Skellow/Carcroft

We are instructed to attend the examination on his behalf and to comment on the issues that affect the development of these sites and associated matters, that have been set out in our original submissions to the Doncaster Local Plan.

Our client supports the allocation of both of the above sites and wishes us to contribute at the examination to assist in finding the plan sound with relevant modifications.

We have addressed the relevant questions in this Matter 4 and set out our comments below.

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:
   a) Does the Plan make as much use as possible of suitable brownfield sites and underutilised land?

The green belt topic paper explains that the Council have through the site selection methodology allocated all suitable urban brownfield sites, before turning to the green belt. The green belt occupies the western part of the Borough and is closely drawn around the settlements within it. The UDP did not safeguard any land and this is the first review of the Green Belt since that plan was adopted over 22 years ago.
b) Would the Plan be effective in optimising the density of development and making effective use of land in line with chapter 11 of the NPPF?

The density of sites that are being released from the green belt have to take account of their character and surroundings and the fact that that they will be the new urban edge. Para 4.29 of the submitted plan sets out that the site capacities are indicative only and that where a different density can support a better design solution this will be supported. The Plan is promoting a flexible approach to density based on site characteristics and design and this is supported.

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

The Council have explained that large parts of the Bough are constrained by flood risk being in FZ 2 and 3. If development were not to take place in green belt locations then the housing requirement could not be met in a sustainable manner.

d) Was the Plan informed by discussions with neighbouring authorities about whether they could accommodate some of the Borough’s identified need for 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?

Site 165/186 at Skellow/ Carcroft is served by public transport and bus stops are available just outside the site boundary on Crabgate Lane.

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

The site at Skellow/ Carcroft is site ref 165/186. The Council have set out in the Appendix to PQ8 the details of this site. The site allocated is the only available site at this settlement
which is surrounded by the green belt. The other sites considered all failed on flood risk.

The summary of the site selection is on pages 144 and 145 of SDE47 which shows all the considered sites and reviews them.

Carcroft Skellow is the largest settlement in this tier with good service provision and an established employment base at Carcroft Industrial Estate. The plan allocates a further 12 hectares of employment land at Carcroft Common. The location is therefore a sustainable one which builds on a settlement with an established service and employment base.

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?

The effect of releasing the site 165/186 from the green belt has been tested through the Green Belt review documents and is summarised in Appendix PQ8.

In terms of the green belt purposes:

- To check the sprawl of large built up areas.

The development of this site is not a sprawl but a planned extension to the existing built up area, it is a planned extension that will take account of the new boundaries to the urban area and the green belt beyond those boundaries to ensure an appropriate built form/green belt interface.

- To prevent neighbouring towns from merging into one another

There is no threat from the development of this site that towns will merge. There is a large area of green belt to the north of Carcroft/Selllow and the nearest town is Askern some miles to the north east.
• To assist the countryside from encroachment

Any release of land on the edge of a settlement to some extent encroaches into the adjacent Countryside, but the planned release of land mitigates against unauthorised encroachments by well-designed developments and considered landscape schemes.

• To preserve the special character of historic towns

This does not apply in this case.

• To assist in urban regeneration by encouraging the recycling of derelict and urban land

The Council have been clear that maximum opportunity has been taken to allocate brownfield sites and minimise the use of green field and green belt land. The Council have summarised in Appendix PQ8 that the site is serving only moderate green belt purposes and we agree with that analysis and on that basis and considered against the tests above the site can be released from the green belt without harm to the essential green belt purposes.

Q4.5. Are the suggested changes in the Council’s response to PQ10 necessary to make the Plan sound, and would they ensure that the proposed boundaries around each of the eight housing allocations removed from the Green Belt are clearly defined using physical features that are readily recognisable and likely to be permanent?

The site boundaries to sites 165/186 are already well defined by the A1 to the west, by Green Lane to the north and Crabgate Lane to the east and existing residential development to the south. The Council acknowledge that this existing infrastructure already clearly defines the site boundaries in their answer to PQ10. It is proposed to introduce a main modification for this site for text to be included in the developer requirements by contributing to improving environmental quality and accessibility of remaining green belt land within the
vicinity of the site. This is aiming to achieve compensatory green belt improvements.

The proposed modification is somewhat vague and it is not clearly understood what is required by this modification and if it is necessary for soundness. Unknown compensatory requirements outside of the site confines and boundaries may not be within the same land ownerships and it is not clear how this could be implemented. If the boundaries of a site are well defined, the site is well planned and landscaped then it is unclear how the modification will assist the green belt and its objectives and therefore would be unnecessary.

**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?**

Site 165/186 has clear and defined boundaries on all sides which represent long term defensible boundaries. There will be no need for these boundaries to be altered in the future.

**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? Exceptional circumstances for changes to the Green Belt Having regard to the above, and any other material considerations …**

In the Councils answer to PQ9 and 10 it is proposed to introduce a main modification for this site 165/186. The developer requirements will be modified to assist in improving environmental quality and accessibility of remaining green belt land within the vicinity of the site. This is aiming to achieve compensatory green belt improvements.

The proposed modification is somewhat vague and it is not clearly understood what is required by this modification and if it is necessary for soundness. Unknown compensatory requirements outside of the site confines and boundaries may not be within the same land ownerships and it is not clear how this could be implemented. If the boundaries of a site are well defined, the site is well planned and landscaped then it is unclear how the modification will assist the green belt and its objectives and therefore would be unnecessary.
Q4.8. Have exceptional circumstances to justify removing each of the eight housing allocations from the Green Belt been fully evidenced and justified?

In respect of site 165/186 Skellow, the Council have set out the summary of the exceptional circumstances in their Appendix to PQ8. We agree with that analysis, which is based upon the detailed green belt review work which has taken place over a number of years.

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?

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?