M4. 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?

Whilst we do not have specific comments to make regarding sustainable patterns of development on the eight housing sites proposed to be removed from the Green Belt, we do have concerns that not enough land has been identified to be removed from the Green Belt as part of the preparation of this Local Plan.

Please see our comments to Question Q4.6 below for further reference.

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 GB boundary, the Council has accepted that exceptional circumstances exist. We therefore support the Councils 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 Councils response to the Preliminary Questions, even with Green Belt release, the allocations for the Main Urban Area is still under the housing target of 7,315 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:

<table>
<thead>
<tr>
<th>Green Belt Site Ref</th>
<th>Capacity</th>
<th>Location</th>
<th>Housing target</th>
<th>Without Green Belt allocation</th>
<th>With Green Belt allocation(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>033</td>
<td>110</td>
<td>Main Urban Area</td>
<td>6,805 - 7,315</td>
<td>6,780</td>
<td>7,042</td>
</tr>
<tr>
<td>115</td>
<td>150</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>040</td>
<td>200</td>
<td>Conisbrough - Denaby</td>
<td>465 - 975</td>
<td>328</td>
<td>528</td>
</tr>
<tr>
<td>141</td>
<td>110</td>
<td>Bawtry</td>
<td></td>
<td>70</td>
<td>90</td>
</tr>
<tr>
<td>165</td>
<td>300</td>
<td>Carcroft - Skellow</td>
<td>300</td>
<td>7</td>
<td>307</td>
</tr>
<tr>
<td>777</td>
<td>66</td>
<td>Barnburgh - Harlington</td>
<td>60</td>
<td>0</td>
<td>66</td>
</tr>
<tr>
<td>929</td>
<td>80</td>
<td>Sprotborough</td>
<td>95</td>
<td>0</td>
<td>80</td>
</tr>
<tr>
<td>1028</td>
<td>74</td>
<td>Tickhill</td>
<td>165</td>
<td>0</td>
<td>74</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1,002</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</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 these 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. This would add flexibility to the Local Plan as safeguarded / reserve sites could be released at the five-yearly plan review stage to ensure greater certainty in delivering the housing requirement across the next plan period and beyond.
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.

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), and that 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 shows 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 the Main Urban Area is still under the housing target of 7,315 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?

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

Furthermore, in respect of the smaller settlement located throughout the Borough which have significant constraints associated with regard to any future development, there is also concern over providing appropriate sustainable development against strong Green Belt boundary constraints in the longer term. For example, if settlements are tightly constrained by Development Limits and Green Belt, (we refer to the village of Clayton which has limited infill opportunities and village expansions are not supported due to the Green Belt being drawn tightly around the existing built up area therefore restricting any future growth), then settlements risk future demise if the community cannot grow to support the existing services and facilities.

Clayton, for example, is a village where there is support for some growth, but such aspirations cannot be met due to the policy restrictions associated with the Green Belt. It is our understanding that the community would like to prepare a Neighbourhood Plan to allow some flexibility regarding new development going forward, however, with the current restrictions, such development is extremely limited. As such, to support the vitality of the smaller settlements and, to ensure that future Neighbourhood Plans have the ability to support small scale development but in line with the Local Plan, Green Belt boundaries and development limits should be amended around smaller settlements too (or perhaps identify reserve sites to allow growth in the future) to ensure that the Green Belt amendments, which are justified at this time, can endure beyond the plan period including future Local Plan Reviews without the need to undertake another Green Belt Review in the short term.

Development in the Green Belt

Q4.11. Is policy 2 part 6 justified and consistent with national policy relating to development in the Green Belt, in particular that related to “limited infilling in villages”?

We have some concerns over how the description regarding infill development in villages in the Green Belt is defined: “the filling of a small gap in an otherwise built up frontage – a small gap is defined as a gap which fronts onto a highway and has a width less than 20 metres between existing buildings”. It is considered that this is too prescriptive. The NPPF does not define limited infilling in villages but it does, at paragraph 145(e), state that limited infilling in villages is an exception to inappropriate development in the Green Belt.

It is our view that each application should be considered on its own merit in the context of the settlement is it located rather than specifying a width of a site. We therefore propose that policy 2 part 6 is amended so that it is in line with national policy, removing the unnecessary additional restrictions which are currently proposed. If deference can be given to the NPPF, perhaps the proposed Local Plan policy text is not required at all.