

**Erection of residential development and public open space with associated infrastructure, landscaping and drainage: Land North of the Railway Line, Rose Hill Rise, Rose Hill, Doncaster**

**Ref No: 22/01710/4FULM**

**OBJECTION FROM: Mr Christopher Owen, 14A Kestrel Drive, Adwick Le Street, Doncaster DN6 7UW**

I apologise for the length of this representation but this is because there are so many aspects of the proposal which are contrary to the policies in the Local Plan or other Council policies, and therefore are grounds for objection. Any one of the breaches of, or failure to follow, relevant policies or initiatives should be sufficient to reject this proposal but the combination of all these breaches and failures clearly shows that Rose Hill is unsuitable for development, and that this development proposal is totally inappropriate.

### **Summary**

The application to build 121 houses on Rose Hill is not in accordance with planning policy as stated in NPPF, nor is it in accordance with the policies set out in the Doncaster Local Plan and other Council strategies and policies. A planning application should not be accepted if there are “material considerations” that indicate it should not be. As shown below, with regard to Rose Hill, there are material considerations weighted against development in many key aspects of the proposal. These material considerations demonstrate that not only is the proposal contrary to many policies in the Local Plan and other Council strategies and policies, but that the harm that this development will cause far outweighs any potential benefits.

To summarise, as shown in this document, this proposed development will result in:

- unacceptable and inappropriate detrimental impact on neighbouring properties;
- harm to existing residents on Rose Hill estate;
- harm to the local character of the area;
- significant loss of amenity to existing residents;
- significant, unacceptable and inappropriate loss of open space;
- breach of the Council’s policies to protect open space and resist developments which result in its loss;
- significant negative impact on green infrastructure, and in particular upon a designated wildlife corridor;
- significant negative impact on biodiversity;
- loss of habitat used for breeding by red and amber-listed birds (as well as many other bird species);
- loss of habitat used by bats;
- loss of habitat used by protected species;
- significant loss of valuable rewilded habitat and wildflower areas used by wildlife (such as insects, invertebrates and other fauna), and which forms part of a designated wildlife corridor;
- loss of habitat which is expanding the adjacent Local Wildlife Sites;
- deterioration of an adjacent Local Wildlife Site caused by the proximity of the development;
- significant loss of trees and/or woodland;
- the loss of trees whose retention the developer’s own tree survey (which is out of date and is therefore not valid) says is desirable, along with many other trees that could and should be retained, and therefore a design layout which has not been informed by a valid tree survey;

- breach of the Council's policy of a presumption against developments which result in the loss of trees/woodland;
- worsening of the Climate and Biodiversity Emergency declared by the Council in 2019;
- loss of an area that should be designated as countryside;
- loss of an area that should be designated as an Open Space Policy area;
- loss of an area that should be designated as a Local Green Space;
- loss of a "green heart" of the type that the Council had said it will create and/or protect;
- development on a site of significant archaeological importance in the area, and one which has "major archaeological constraints";
- significant loss of amenity in relation to traffic and access issues for existing residents of the Rose Hill estate;
- significant risk to road-users and pedestrians caused by the additional traffic arising from the development;
- detrimental impact on the existing road network;
- additional noise, pollution and a reduction in air quality;
- creation of a housing development which will increase and encourage car usage (as evidenced by the extent of parking spaces in the proposal's layout) and which cannot be adequately served by sustainable transport;
- creation of a large housing development which is out of character with the surrounding area (open space, woodland and bungalows/ single-storey dwellings) in both design and location, with consequent impact on the amenity of residents living in the Rose Hill estate, and more generally the overall character and appearance of the area;
- significant and unacceptable disruption, noise, traffic issues and loss of amenity caused to existing residents during the proposed 10-year construction period;
- degrading of the existing public rights of way/bridle paths on the site;
- inability of residents of the new development to obtain important services such as schools, doctors, dentists, etc locally and/or in a sustainable manner;
- likely inability to get adequate utilities to the new development due to site constraints;
- the capacity of the existing foul water sewage system being overloaded as it will likely be unable to cope with the proposed additional housing; and
- a non-sustainable and unnecessary development on an existing green natural space at a time of a Climate and Biodiversity Emergency during which the Council states that (i) action is urgently needed to protect green spaces, existing habitat and biodiversity and (ii) tackling climate change is no.1 of its "8 Great Priorities".

Specifically and in addition, the proposal is contrary to the following policies in the Local Plan:

- Policy 19 (Access, Design and Layout of Public Rights of Way);
- Policy 26 (Green Infrastructure);
- Policy 27 (Protecting Open Space and Non Designated Open Space);
- Policy 29 (Ecological Networks);
- Policy 30 (Valuing Biodiversity and Geodiversity);
- Policy 31 (Local Wildlife and Geological Sites);
- Policy 32 (Trees, Woodlands and Hedgerows);
- Policy 35 (Development Affecting Archaeology);
- Policy 41 (Character and Local Distinctiveness); and
- Policy 44 (Residential Design)

The proposed development is also contrary to the following Doncaster Council strategies and policies:

- Doncaster Green Infrastructure Strategy;

- Doncaster Environment and Sustainability Strategy;
- Doncaster Climate Commission Report;
- Doncaster Delivering Together; and
- Doncaster Central Locality Plan 2022.

The development of Rose Hill is also contrary to the Council's public statements on the environment, biodiversity and tackling climate change, and its claims to listen to communities in making decisions.

All the above factors mean **the proposed development should be rejected**.

### **Other introductory comments**

It seems that the application has been made without all the necessary documentation being provided, and in some instances without the necessary work having being performed.

The application was submitted in mid-July 2022. At that time, the Planning Summary contained some yellow-highlighted paragraphs and two paragraphs contains a reference to information "TBC" [to be confirmed]. Further a number of documents and/or the work/findings contained in them appear to have been produced over a year ago (e.g. the tree survey work was performed in March 2021; the preliminary ecology report work was performed in April 2021; the traffic assessment was performed in June 2021) and are therefore not up to date and/or out of date.

A number of important documents (e.g. all necessary ecological reports; the Ecological Impact Statement) do not appear to have been prepared as at the time of writing. Missing or incomplete documents are referred to as necessary in the detailed comments following. Further objections or comments may therefore be necessary once all necessary reports and documents are available.

It should also be noted that Doncaster Council has a significant conflict of interest with regard to Rose Hill, being both the planning authority responsible for granting planning permission and the owner of the site. The Council therefore has a financial interest in the sale going ahead, which will only occur if planning permission is granted. In an email to local Councillors on 14 July 2022, the applicant Miller Homes stated that *"our submitted scheme is the product of comprehensive partnership working with Doncaster Council Officers"*. Normally one would not expect a planning authority to enter in a "partnership" with a developer to help them submit a development scheme. We would therefore be grateful if a full explanation regarding the nature of this "partnership" could be provided by Doncaster Council.

### **Description of Rose Hill**

Rose Hill is a 16.67 acre area of green open space owned by Doncaster Council. Rose Hill is bordered on two sides by Local Wildlife Sites/ protected open space and countryside, namely Red House Plantation and Doncaster Common/ the Racecourse. On one other side of the site is a railway line which is part of a wildlife corridor across the borough. The remaining side is bordered by bungalows in the existing quiet residential Rose Hill estate.

Up until 1997, Rose Hill was used for agricultural purposes. In or around 1997, the Council withdrew permission for the tenant farmer to continue to farm the site and since then, the site has remained fallow. Over the following 25 years, this ex-agricultural field on Rose Hill has rewilded or naturalised. It is now therefore in a completely different condition and is used for completely different purposes than was the case in 1997.

Over the past 25 years, through naturalisation, Rose Hill has become a biodiverse mixed habitat containing areas of young woodland, grassland and scrubland which supports trees, wildflowers, and much wildlife, including protected species. In particular, Rose Hill supports a significant number of trees, many of which are semi-mature having grown naturally on the site for the past 20-25 years. A number of trees on the boundaries of the site are subject to Tree Preservation Orders, and there are extensive hedgerows bordering the site.

Rose Hill also forms part of a designated green infrastructure/wildlife corridor which allows wildlife to move across Doncaster. Through naturalisation, Rose Hill is also expanding the adjacent Local Wildlife Sites and providing further habitat for the wildlife that occupies these areas. It also falls within a Sites of Special Scientific Interest Impact Risk Zone associated with the Sandal Beat SSSI to the north-east.

Rose Hill is a much-valued community asset and green open space widely used by the public for recreation and to connect with nature. There are, for example, three designated bridle paths on the site. It is common to see walkers, cyclists, dog-walkers and horse-riders on the paths crossing Rose Hill, and for cars to be parked at the entrances to the site by people who have driven from outside the immediate vicinity to visit the site for recreational purposes.

Rose Hill is also the site of significant archaeological remains associated with Roman period pottery production and associated settlement, agriculture and pottery production. The Local Plan noted that there were “significant archaeological constraints” associated with its development.

In addition due to its location – being bounded on two sides by Local Wildlife Sites and on another by the wildlife corridor and railway line – the only way in and out of the proposed development is through the existing quiet estate roads. There are only two roads into the existing Rose Hill estate, only one of which can be used as an exit. Local residents are concerned not only that the existing estate roads will be unable to adequately cope with the additional traffic but that there will also be a detrimental impact on the wider road network, specifically the A638 Bawtry Road.

In summary, Rose Hill is a biodiverse rewilded habitat which is expanding the adjacent Local Wildlife Sites, which supports biodiversity and significant numbers of trees, is allowing wildlife to recover and flourish, and is a green open space and “green heart” widely used by the local community. It is therefore exactly the sort of place the Council says must be protected to tackle climate change, stop biodiversity loss and create greener communities. Given this, it is shocking that the Council is working with a developer to destroy Rose Hill forever, rather than protecting and enhancing it for both wildlife and future generations.

It should be noted that Rose Hill appears to have been misdescribed in certain documents produced by Miller Homes and its consultants. For example, the Planning Report states it comprises “unmanaged grassland” when in fact it comprises grassland, scrubland and areas of young woodland. The photographs used in the Planning Report and in consultants’ reports are also out of date and fail to show the extent of trees and vegetation now growing on the site.

The local community urges the Planning Committee (and indeed Council officers) to visit Rose Hill to see this beautiful place for themselves and what will be destroyed by this development if it goes ahead.

## **Lack of Sustainability**

The proposed development is not sustainable for the following reasons:



- The proposal is not socially sustainable. For the reasons set out later in this document, it will have a significant negative impact on the amenity of existing residents and the local area (including in relation to loss of open space and traffic issues).
- The proposal is not environmentally sustainable. For the reasons set out later in this document, it will have a significant negative impact on biodiversity, will result in a significant loss of trees (including young woodland), will degrade/ destroy an existing wildlife corridor, and will result in the deterioration of an adjacent Local Wildlife Site. It will also have a detrimental impact on the borough's efforts to combat climate change and rewild areas of Doncaster. In addition, the proposal will lead to increased car usage (with the consequent increase in noise and pollution and decrease in air quality) and due to the development's location and transport constraints, it will not lead to any appreciable increase in the use of sustainable transport.

Further the development is not sustainable because it is not required in order to meet projected housing need in Doncaster:

- The Local Plan was prepared as at April 2018. Since then, there have been a number of significant events which mean that the allocations for development set out therein urgently need to be revisited and revised. For example, the Council has declared a Climate and Biodiversity Emergency in 2019 which has worsened over subsequent years with, for example, Doncaster experiencing heatwaves and wildfires in the summer of 2022. The urgent need to protect our natural environment, and in particular areas which support biodiversity and substantial numbers of trees, is now greater than ever, and the Local Plan should be revised to reflect these rapidly changing circumstances.
- Further, economic circumstances have significantly changed since the Local Plan was prepared which mean that the Council's projections of housing need are out of date and likely to be overstated. In addition the potential closure of Doncaster Airport, if it occurs, will mean that population projections and the number of employment opportunities used to support housing need in the borough will likely be overstated.
- Notwithstanding the above, the projected housing need set out in the Local Plan is in any event overstated:
  - UK Government projections stated at the time that Doncaster required 553 new houses building per annum in the period to 2035 to meet housing need.
  - The Local Plan however states that 15,640 (i.e. 920 p.a.) new houses are needed in the period to 2035, a significant increase (66%) over and above government projections.
  - The total supply actually allocated in the Local Plan is 19,492 houses, i.e. around 3,852 (25%) more houses than the Council believes are actually needed, and around 115% more houses than UK Government projections of housing need.

In a Climate and Biodiversity Emergency and therefore the urgent need to protect wildlife, habitat and green spaces, it is simply not necessary or sustainable to build on a rewilded biodiverse green open space, particularly given the Council's own supply figures will result in 3,852 more houses than are needed being built during the Plan Period.

- It should also be noted that according to the Council's own Residential Housing Survey, there are currently over 12,000 houses with planning permission not yet built, i.e. around 76% of the projected total need to 2035 has already been secured. The Council should therefore stop releasing more green fields for developers to build on and focus on making developers build

those that they already have permission for, and focus any further development on brownfield sites. Given that over three-quarters of the alleged total housing need to 2035 has already been secured, it is not necessary or sustainable, particularly during a Climate and Biodiversity Emergency, to allow a developer to build on a pristine greenfield site like Rose Hill which has rewilded, and which supports wildlife and biodiversity when there are other allocated sites in Doncaster which are more suitable.

With regard to the issue of sustainability, paragraph 7 of NPPF states that *“at a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.”* Given (i) the number of housing allocations is higher than projected housing need; (ii) there are a significant number of houses with planning permission not yet built; (iii) the changing economic circumstances (with its consequent impact upon likely population growth in the borough); and (iv) the worsening Climate and Biodiversity Emergency which means it is vital that biodiversity, habitat and wildlife are protected in order to prevent catastrophic climate change impacting future generations, the proposal to develop Rose Hill is not sustainable under this definition.

## Conclusions

The proposal is not socially or environmentally sustainable and should be rejected.

## Detrimental impact on green infrastructure - The development is contrary to Policy 26 (Green infrastructure)

### Introduction

Policy 26 states that it is a key strategic objective for the Council to *“protect, maintain, enhance and, where possible, extend or create Doncaster’s green infrastructure (GI), including landscapes, ecological networks, natural environment, open spaces, public rights of way, geodiversity, biodiversity, navigable river and waterway assets.”*

Rose Hill forms part of Doncaster’s existing green infrastructure, being a biodiverse rewilded habitat connected to other nearby green spaces (the Local Wildlife Sites at Red House Plantation and Doncaster Common), and to other green spaces in the borough through one of the Council’s Green Infrastructure corridors, namely the Sandall Beat Loversall Link. That this is the case is recognised in both the Local Plan and the developer’s ecology report:

- *“The site has biodiversity value and forms part of a wider network of connected and biodiverse greenspace.”* (p282, Local Plan);
- *“Wildlife Corridors. The most significant corridor is the railway which runs immediately adjacent to the Site, linking it to areas of potentially higher value habitat such as Sandall Beat woodland to the north-east, and Potteric Carr wetlands to the south-west.”* (paragraph 13, Preliminary Ecological Appraisal Report). Through the use of the term “most significant corridor”, the ecology report recognises that Rose Hill also acts as a wildlife corridor between other green assets such as the Local Wildlife Sites at Red House Plantation and Doncaster Common.

Rose Hill is also an important open space for the local community (see comments on Policy 27 below) and contains three bridlepaths, and is therefore also part of the green infrastructure relating to open spaces and public rights of way.

## Details of non-compliance with the policies set out in the Local Plan

Since Rose Hill forms part of the borough's green infrastructure assets and the specific criteria set out in Policy 26 for protecting such assets and/or permitting development have not been met, the application should be refused for the following reasons:

***"The Council will protect, maintain, enhance and, where possible, extend or create Doncaster's green infrastructure (GI), including landscapes, ecological networks, natural environment, open spaces, public rights of way, geodiversity, biodiversity ....."***

As noted above, Rose Hill is part of Doncaster's green infrastructure corridors, most importantly being part of the Sandall Beat Loversall Link, a wildlife corridor which allows wildlife to move freely across the borough. Accordingly development of Rose Hill will **not** protect, maintain, enhance or extend Doncaster's green infrastructure: it will instead degrade and/or destroy part of it.

In this regard, it should also be noted that the Local Plan's "vision for the future" is to make Doncaster "a place where nature flourishes and wildlife can move easily across the Borough, through a network of well-connected green infrastructure". This is unlikely to occur if the Council allows an area such as Rose Hill (which forms part of the borough's existing network of well-connected green infrastructure) to be degraded and/or destroyed.

***"Proposals will be supported which contribute toward green infrastructure and have regard to the latest Council GI audits and strategies"***

As noted above, the proposal does not contribute toward green infrastructure. On the contrary, it has a detrimental impact upon it.

As shown later in this document, the development is also not in accordance with the Council's GI audits and strategies.

***All major development proposals of 1 hectare or more will be required to demonstrate how the development: ... 2. creates or enhances green corridors, including rights of way; 3. provides specific and dedicated spaces for wildlife to encourage a more robust and connected network of habitats; 4. considers tranquillity and provide for generous biodiversity rich open spaces; ... 6. avoids loss or damage or deterioration to green infrastructure assets; ... 9. helps people and wildlife adapt to the impacts of climate change by including naturalised forms of flood storage and/or incorporating additional tree planting within developments ..."***

Policy 26 requires that the proposal demonstrates the above requirements. The planning application contains no such demonstration and therefore should be rejected.

- The proposal does not "create or enhance green corridors, including rights of way". As noted above, the proposal degrades and/or destroys an existing green corridor rather than creating or enhancing it. Further as shown later, the proposal does not create or enhance existing rights of way (e.g. bridlepaths) across the site, but instead degrades them (since post-development, the bridle paths will run through a busy housing estate instead of through a pleasant quiet natural environment of grassland, scrubland and trees).
- The proposal does not "provide specific and dedicated spaces for wildlife to encourage a more robust and connected network of habitats". The proposal destroys an area of existing dedicated habitat for wildlife. Any such spaces that are retained are small and totally inadequate for wildlife, will have existing habitat largely if not entirely removed from them, and will not

encourage a more robust and connected network of habitats as required by the policy (as the proposal will degrade and/or destroy the existing habitat and wildlife corridor).

- The proposal does not *“consider tranquillity and provide for generous biodiversity rich open spaces”*. On the contrary, the proposal destroys an existing biodiversity-rich open space. Further, the site is currently a tranquil green open space with a quiet residential area on one side, has existing Local Wildlife Sites on two other sides, and a quiet railway line on the other. This proposal will destroy the site’s tranquillity by replacing it with 121 houses with all the consequent traffic and noise, and disturbance that will cause.
- The proposal does not *“avoid loss or damage or deterioration to green infrastructure assets”*. As noted above, on the contrary it results in the loss, damage and/or deterioration of the existing green infrastructure/wildlife corridor.
- The proposal does not *“help people and wildlife adapt to the impacts of climate change by ... incorporating additional tree planting within developments”*. In fact it does the opposite. The proposal results in the destruction of existing wildlife habitat and significant numbers of trees which are already sequestering carbon and helping to tackle climate change. The trees which are to remain on site post-development are broadly only those which border the site: all trees on the site itself will be removed. Further the new trees which it is stated will be planted on site are significantly less in number than those existing there already (see comments on Policy 32) and are totally inadequate as a replacement for the existing trees on site which will be lost as a result of the development. There is therefore no *“additional tree planting”* resulting from this proposal as required by the policy, and certainly none which helps people or wildlife adapt to the impacts of climate change. The proposal therefore makes the impact of climate change worse.

***“The impacts of climate change are far reaching, with one of the simplest solutions being the incorporation of additional tree planting within new developments to alleviate temperature fluctuations and improve flood storage capacity. The additional tree planting will contribute toward achieving a low carbon borough by aspiring toward a tree canopy cover of 20% from 12.2% in 2018.”***

The proposal will reduce the number of trees in the borough since any tree planting will not compensate for the significant number of trees lost as a result of the development. There is therefore no *“additional tree planting”* occurring as a result of this development, and therefore the development will actually reduce tree canopy cover than increase it.

## **Conclusions**

The development of Rose Hill is contrary to Policy 26 of the Local Plan and therefore the Council should not support the development.

## **Loss of public open space - The development is contrary to Policy 27 (Protecting Open Space and Non Designated Open Space)**

### **Introduction**

Policy 27 of the Local Plan is clear that open space (including non-designated open space and informal open spaces) should be protected and that developments on such open space will only be supported providing certain specific criteria are met.

Given all its characteristics and the use by the local community as an open space, Rose Hill should have either been designated as an open space policy area or a Local Green Space during the preparation of the Local Plan.

If it should be the case (incorrectly) that Rose Hill is not deemed to be a open space policy area or a designated Local Green Space, then Rose Hill falls under the definition of a “non-designated open space” and/or informal open space as it is a green open space used for public recreation which provides amenity to the local community.

### **Details of non-compliance with the policies set out in the Local Plan**

Since Rose Hill is an open space and/or a non-designated or informal open space and the specific criteria set out in Policy 27 for development have not been met, the application should be refused for the following reasons:

***“The Council will protect open spaces which provide important opportunities for formal and informal recreation as well as those which provide a social, cultural and ecological role”.***

Rose Hill clearly falls under the definition of open space set out in Policy 27. The land at Rose Hill is a green open space and community asset which provides important opportunities to the local community for recreation and to connect with nature (It should be noted that people also drive to Rose Hill from elsewhere in Doncaster to enjoy this local beauty spot). There are three public rights of way/bridleways on the site. Rose Hill is therefore an open space which provides an important opportunity for informal recreation.

The open space at Rose Hill also has an ecological role due to the wildlife, trees and wildflowers on site, as well as being part of a green infrastructure asset. It also has a cultural role in Doncaster’s history being the site of major archaeological remains relating to the Roman period.

Policy 27 therefore requires that the open space at Rose Hill must be protected.

***“Within non-designated open space, development proposals will only be supported where: ... 3. visual amenity is retained and enhanced; 4. nature conservation improvements are the key driver; 5. green infrastructure connections are retained.”***

It is clear that none of the existing visual amenity will be retained by the development of Rose Hill. The development will completely destroy a visually appealing and beautiful green open space (which has been referred to in the Doncaster Free Press as a “beauty spot”). The visual amenity enjoyed by residents of the existing Rose Hill estate and the Cantley residents with houses on the other side of the railway line which overlook the site will also be destroyed by this development.

The development of Rose Hill does not have nature conservation improvements as a “key driver”. The key driver seems to be the developer’s wish to make substantial profits by building houses on a greenfield site next to the Racecourse. The impact of the proposed development will instead be the

destruction of existing habitat, the loss of significant numbers of trees, and the displacement of wildlife, including red and amber listed birds and protected species. The construction of such a large development directly next to the Local Wildlife Site at Red House Plantation will also result in degradation and deterioration of that site.

As noted earlier, Rose Hill forms part of an existing wildlife corridor/ green infrastructure asset. Development of this site means that green infrastructure connections on the site will be destroyed and/or degraded and will not be retained.

Accordingly it is clear that there is no nature conservation improvement associated with development of this open space, and that nature conservation is not a “key driver” as required under the policy. Under Policy 27 therefore, the development cannot, and should not, be supported.

***“Proposals involving the loss of ... non-designated open space, such as playing fields, will only be supported: 1. in accordance with national policy, and 2. where community support can be demonstrated through public consultation”.***

The development of Rose Hill is not in accordance with national policy regarding open spaces (see comments below).

In addition, community support for the development of Rose Hill (and therefore the loss of this open space) does not exist. As evidenced by the number of objections to this proposal, the local community do not support this development. Further, there has been no meaningful public consultation by either the Council when deciding to sell the land (in fact, local councillors were forbidden from informing the local community about the intention to sell until it had been decided) or the developer, Miller Homes. Such limited consultation as has been performed by Miller Homes has not demonstrated community support.

Accordingly under Policy 37, the proposal to develop Rose Hill should not be supported.

***“National planning policy states that ‘existing open space, sports and recreational buildings and land, including playing fields, should not be built on, without prior consideration. Development proposals resulting in the permanent loss of the open space will therefore be required to: (i) demonstrate the land provides no benefit to the community and the local community supports alternative proposals; (ii) demonstrate through an independent assessment that the land or buildings are surplus to requirement; (iii) ensure the need for and benefits of the development outweighs the loss; and (iv) provide compensation for loss of facilities.”***

The above quote from NPPF included in the Local Plan is clear: existing open space should not be built on without prior consideration of certain specific matters. In this instance, no prior consideration appears to have been given to the proposal to build on the existing open space at Rose Hill (or indeed by the Council in selling this site) and whether or not it is appropriate under the circumstances.

The proposal to develop Rose Hill (resulting in its permanent loss) does not demonstrate the specified requirements under NPPF for the following reasons:

- As noted earlier, the land provides significant benefits to the local community. Further, the local community does not support the proposal to build houses on Rose Hill.

- No “independent assessment” has been performed to demonstrate the land is “surplus to requirement”.
- The (alleged) need for and benefits of the proposed development do not outweigh the loss of the open space that will result from the development for the reasons set out in this section.
- No compensation is being provided to the local community for the loss of this precious green open space and community asset.

***“The Council will resist any development proposals resulting in the permanent loss of open space, especially in deficient areas. However, we also acknowledge that not all open space is of value to the local community - in such cases community consultation will be carried out and an assessment will be required to identify whether the site is suitable for a different type of open space use in the first instance or a beneficial local community use in the second instance. Permanent loss of open space will require careful consideration as this can result in increased pressure on remaining facilities.”***

Rather than resisting the development proposal to destroy Rose Hill, the Council has actively marketed this site to developers and is working with them to build on Rose Hill. Since the proposal to develop Rose Hill will permanently reduce the amount of open space, the Council should apply its own policy relating to developments on open space and therefore resist/oppose this proposal.

As previously noted, the open space at Rose Hill is of value to the local community and no community consultation and no assessment of the nature referred to has been performed.

Further, it does not appear that “careful consideration” of the permanent loss of this open space has been performed. The Council has consistently ignored requests from the local community to stop the sale of Rose Hill to a developer and to protect Rose Hill from development. In fact, the only option considered by the Council appears to be Rose Hill’s sale for development.

***“Visual amenity, environmental and ecological value of the open space should also be retained and where possible enhanced through the protection of existing trees and other important habitats and through appropriate landscaping of important areas, vistas and frontages and careful attention to detailed design and layout”.***

The current visual amenity, environmental and ecological value of the existing open space at Rose Hill will not be retained but will instead be destroyed by the development of 121 houses, and clearly, such amenity and value will not be enhanced by this development.

Further, existing trees will not be protected. Whilst some trees around the site will be retained, the majority of trees will be cut down and will not be replaced (see comments on Policy 32).

**Rose Hill fulfils all the criteria to qualify as a Local Green Space and should have been so designated during the Local Plan process**

Rose Hill should have been designated as a Local Green Space during the preparation of the Local Plan in accordance with national policy and guidance. A request was made during the review of the Local Plan for this designation to be applied but this request was ignored by the Council.

The fact that Rose Hill meets all the criteria for a Local Green Space demonstrates its value to the community and as a green open space, and which therefore should not be built on and should instead be protected for future generations.

Paragraph 102 of NPPF states that the designation of Local Green Space is appropriate:

- *“Where the green space is in reasonably close proximity to the community it serves”.* Rose Hill is directly next to part of the community it serves and is widely used by residents of Bessacarr, Cantley and Lakeside.
- *“Where the green area is demonstrably special to a local community ...”* The local community has formed a residents’ group called the Rose Hill Residents’ Association (“RHRA”) to fight the proposals to build on Rose Hill. The RHRA has campaigned for many years to prevent this development. 83 objections to the allocation of Rose Hill for development during the Local Plan process were received, a number which was described as “notable” in the analysis of objections. An on-line petition of over 1,350 signatures protesting the development of Rose Hill has been produced. A petition containing over 110 signatures was presented to the Full Doncaster Council meeting on 14 July 2022 asking the Council to stop the sale and development of Rose Hill. A significant number of objections to the present planning application have also been made. Rose Hill is therefore demonstrably special to the local community.
- *“... and holds a particular local significance, for example because of its beauty...”* Rose Hill is a beautiful diverse habitat containing trees, wildflowers, and paths which run between the trees and across the grassland and scrubland. It is also in a pleasant and attractive location next to Doncaster Common and Red House Plantation, both Local Wildlife Sites. As noted earlier, the Doncaster Free Press has referred to Rose Hill as a “beauty spot”. No-one visiting Rose Hill can fail to notice its beauty. Its significance to the local community is also evident from the number of objections to its proposed development, and the number of press articles which have appeared in both the Doncaster Free Press and the Yorkshire Post over the years.
- *“... historic significance...”* As is evident from the archaeological assessment, Rose Hill contains significant archaeological remains from the Roman period of significance to Doncaster’s history and heritage.
- *“... recreational value ...”*, Rose Hill is widely used by local residents for recreation. It is common to see people walking on Rose Hill, dog-walkers and cyclists using the site. Birdwatchers also visit because of the birdlife there. Rose Hill contains three designated public rights of way/bridle paths and is used by horse riders from the nearby Sandall Beat stables.
- *“... tranquillity ...”* Rose Hill is in a peaceful setting, situated between two Local Wildlife Sites, a quiet railway line, and a quiet housing estate. No-one visiting Rose Hill can fail to notice how peaceful it is, being situated some distance from busy roads or other sources of noise or disturbance.
- *“... or richness of its wildlife...”* Rose Hill is a diverse mixed habitat supporting many trees, wildflowers, insects and birds (including red and amber-listed species, and protected species).
- *“Where the green area concerned is local in character and is not an extensive tract of land.”* Rose Hill is a self-contained 16.67 acre area of land which is clearly local in character.

Given the above, Rose Hill should therefore be designated as a Local Green Space and protected from development. In the interim, the proposal should therefore be rejected and Rose Hill protected from development until such time as the formal designation is made.



## Other comments

Rose Hill should have been designated as open space and/or “countryside” in the Local Policies Map and/or considered as countryside for the purposes of this proposal. As recognised in the Planning Report, the surrounding areas of Doncaster Common and Red House Plantation are both allocated as protected open space and/or countryside (under Policies 25 and 27). Rose Hill meets all the criteria for open space and countryside (see earlier comments) and in terms of its location and character, is no different from the open space and/or countryside that are adjacent to it. This development proposal is therefore to all intents and purposes destroying a rare extension of countryside into the main urban area of Doncaster, and a “green heart” of the type that the Council says it wants to create and/or protect.

## Conclusions

The development of Rose Hill is contrary to Policy 27 of the Local Plan and therefore the Council should not support the development and resist it as is required under the Local Plan.

## Detrimental Impact on Ecological Networks - The development is contrary to Policy 29 (Ecological Networks)

### Introduction

As noted earlier, it is accepted by both the Council and the proposed developer that Rose Hill forms part of the ecological network within the borough (the so-called wildlife corridors) that links habitats together and perform a valuable role in protecting, maintaining and enhancing biodiversity.

Policy 29 states that proposals will only be supported where they “*protect, create, maintain and enhance the Borough’s ecological networks*”. Building 121 houses on part of an ecological network clearly does none of those things. The proposal should therefore be rejected on that basis.

### Details of non-compliance with the policies set out in the Local Plan

#### ***“Proposals will only be supported which deliver a net gain for biodiversity ...”***

The proposal will not deliver a net gain for biodiversity. No attempt appears to have been made by the developer to follow the BNG hierarchy by seeking to avoid damage, provide on-site mitigation, or provide off-site mitigation. No evidence of the provision of a net gain for biodiversity arising from this proposal has been provided to date.

***“Proposals will only be supported which ... protect, create, maintain and enhance the Borough’s ecological networks by: A) being of an appropriate size, scale and type in relation to their location within and impact on the ecological network; B) maintaining, strengthening and bridging gaps in existing habitat networks; C) planting native species and creating new, or restoring existing, national and local priority habitats and/or species; and D) working with strategic partnerships to deliver conservation projects at a landscape scale where appropriate”.***

As shown earlier, this proposal will not “*protect, create, maintain and enhance the Borough’s ecological networks*”. On the contrary, it will degrade and/or destroy an existing wildlife corridor. Further:

- The proposal is not of an appropriate size, scale or type in relation to its location within, and impact on, the ecological network. Building 121 houses surrounded by fences, tarmac and concrete, together with the busy roads associated with such infrastructure, on a wildlife corridor will result in a significant detrimental impact.
- Clearly building 121 houses on a wildlife corridor will not “*maintain, strengthen or bridge gaps*” in the existing habitat network. On the contrary, it will create a gap in the network and degrade/ weaken it.
- The proposal will do nothing with regard to “*planting native species and creating new, or restoring existing, national and local priority habitats and/or species*”. It will however result in the loss of native species and the loss of existing habitat and species, several of which currently live on Rose Hill (see comments on Policy 30).
- There is no evidence that the developer has sought to “*work with strategic partnerships to deliver conservation projects at a landscape scale where appropriate*”.

### Details of non-compliance with the Environmental Strategy

***“The impact on nature includes loss of habitat and degradation of its quality, character, distinctiveness and connectivity; in-turn resulting in a loss of species diversity – our biological communities are becoming more similar to each other and in turn less resilient .... We must work to a principle of ‘bigger, better and more joined-up’ areas of nature. This means thinking about ecosystem functions at a landscape-scale.”***

We aim to create “***bigger areas for nature, and better quality habitats, that are more joined up at all scales***”.

The above quotes come from section 2 “Biodiversity” of Doncaster’s Environmental Strategy. These quotes make it clear that a key element of the borough’s environmental strategy is to protect habitat and the connections between them. Building 121 houses on a habitat which itself connects other habitats will result in smaller areas for nature and less connectivity. In fact, development of Rose Hill will lead to the very thing the strategy warns about: loss of habitat and degradation of its quality, character, distinctiveness and connectivity, resulting in a loss of species diversity. The proposal to develop Rose Hill does not lead to “*bigger, better and more joined-up*” areas of nature. Rather it will lead to the exact opposite.

The Environmental Strategy also notes that “*green infrastructure contributes significantly to local climate regulation. Trees absorb carbon dioxide, converting it to oxygen through natural processes. Tree canopies create shade and shelter, and they help prevent or reduce the risk of flooding by absorbing water, intercepting it and slowing down the rate that it flows into rivers. Trees also help protect soil erosion and surface run off and provide a pleasant, natural landscape and cover for/contrast within the built environment. Our parks, green spaces, and woodland enhance our settlements, providing places for us to relax and exercise, while at the same time providing areas where nature can flourish. Through diversification of grassland management, we can support ecosystems and reduce our carbon footprint.*”

The above paragraph illustrates how important Doncaster’s green infrastructure assets are, not just to tackling climate change and to nature, but to people. And yet at Rose Hill the Council is apparently ignoring its own environmental advice regarding the importance of green infrastructure (and in particular trees) by allowing a developer to destroy the very thing it says significantly contributes to its environmental aims.

## Other relevant comments

The Local Plan states that *“the emphasis of nature conservation is shifting from protecting wildlife solely within discrete sites to establishing a network of core areas of habitat that are robustly linked together through habitat corridors resilient to environmental change and human pressure.”* As noted earlier, this proposal will have a detrimental impact upon the existing network of habitats in the borough.

The Local Plan further notes that *“an independent review of England’s wildlife sites and ecological network made five key recommendations”* as follows:

- *“to improve management of existing wildlife sites”*: The presence of a large housing estate directly next to an existing Local Wildlife Site will only serve to degrade that site rather than improve it;
- *“to increase the size of existing wildlife sites”*: Rose Hill is a rewilded biodiverse habitat which is turning into woodland. Given its location next to Red House Plantation (an existing woodland and Local Wildlife Site) and Doncaster Common, it is therefore ideally suited to increase the size of these existing sites.
- *“to improve the connections between sites”*: As noted above, the proposal will degrade/destroy the connection between sites.
- *“to create new sites”*: As noted above, Rose Hill is ideally situated, and contains potential (if not there already) to be made into a new Local Wildlife Site;
- *“to reduce the pressure on wildlife by improving the wider environment”*. Development of this site will only increase the pressure on wildlife and lead to deterioration of the wider environment.

***“To assist with the vision of having a coherent ecological network the Council has identified a series of Biodiversity Opportunity Areas. Development proposals within these areas can deliver the most for the ecological network by directing compensation or enhancement measures towards the creation or restoration of habitats that are particularly important for that part of the ecological network”***

Rose Hill falls within the Finningley Cover Sands Biodiversity Opportunity Area. Given that the Council wishes to create “coherent ecological networks” in these areas, it should not be permitting development on a habitat on a wildlife corridor in one of those areas. Further as a rewilded biodiverse habitat next to existing Local Wildlife Sites and on a wildlife corridor, Rose Hill is ideally placed to be a site for creation, enhancement or restoration of the habitats that are particularly important for that part of the ecological network. In this regard, parts of Rose Hill (such as areas across the middle of the site) consist of young regenerating woodland and therefore should be protected, not destroyed by development. Woodland is a specified habitat in the Finningley Cover Sands area.

In addition, it should be noted that a visit to the site by members of the Doncaster Naturalist Society in February 2022 noted that *“Interestingly areas of finer grasses including Red Fescue (Festuca rubra) and Common Bent (Agrostis capillaris) with Sorrel (Rumex acetosa) were developing into what may ultimately be classified as NVC U1 Lowland dry acid grassland”* which is one of the specified habitats important to Finningley Cover Sands.

## Conclusions

The development of Rose Hill is contrary to Policy 29 of the Local Plan (since it will degrade/destroy an existing ecological corridor). The Council should not therefore support this development.

## **Significant loss and deterioration of biodiversity - The development is contrary to Policy 30 (Valuing biodiversity and geodiversity)**

### **Introduction**

At the time of writing, no Ecological Impact Statement has been prepared and therefore additional comments will be necessary in the light of its contents in due course.

It should also be noted that the existing preliminary ecology report recommends that further specific surveys be performed, none of which appear to have been done. For example, the report notes that *“the survey was carried out in early Spring [2021] when many floral species are not yet in growth. Further survey within the summer growing season is recommended to ensure more important grassland habitats have not been overlooked.”* No additional survey of this nature has been produced as yet.

Notwithstanding the above however, on the basis of the information currently available, it is clear that this proposal does not value biodiversity and will result in a significant loss and deterioration of wildlife and nature, and does nothing to help wildlife flourish in the borough, which is part of the Council’s vision for Doncaster set out in the Local Plan.

### **Details of non-compliance with policies set out in the Local Plan**

***“All proposals shall be considered in light of the mitigation hierarchy in accordance with National Policy”.***

There is no evidence that this proposal has considered the mitigation hierarchy required by national policy. No attempt has been made to avoid the loss or provide on or off-site mitigation.

***“Proposals which may harm designated Local Wildlife Sites ... Priority Species, protected species or non-designated sites or features of biodiversity interest, will only be supported where:***

***“1. they use the DEFRA biodiversity metric to demonstrate that a proposal will deliver a minimum 10% net gain for biodiversity”;*** No such demonstration has been provided at the time of writing.

***“2. they protect, restore, enhance and provide appropriate buffers around wildlife and geological features and bridge gaps to link these to the wider ecological network”;*** As noted earlier, the proposal degrades and/or destroys an existing wildlife corridor and instead of bridging gaps in the ecological network, creates a gap.

***“3. they produce and deliver appropriate long term management plans for local wildlife and geological sites as well as newly created or restored habitats”;*** The proposed development is directly next to the Local Wildlife Site at Red House Plantation. The Planning Brief relating to Rose Hill states:

- *“There will need to be commitment to managing the woodland in the long term in order to offset the damage caused by additional visitor pressure from people living on the adjacent site.”*
- *“An Ecological Assessment of Redhouse Plantation prior to development commencing will be required in order to assess the impact of development on the LWS and to guide the refurbishment works/management regime.”*
- *“As well as dealing with protected species issues, the Council would expect an application to demonstrate how it will provide compensation for the loss of the habitats present on site”.*

- *“The development of a large housing development alongside will require a much more comprehensive management programme if the environmental quality, amenity and recreation potential of the Plantation is to be protected and enhanced”.*

None of the above steps appear to have been taken by the developer as required by the Local Plan and the Planning Brief. The application is therefore deficient in respect of these areas and should be rejected.

**“4. they can demonstrate that the need for a proposal outweighs the value of any features to be lost”.** Given the Council’s declaration of a Climate and Biodiversity Emergency, its statements about the urgent need to protect wildlife and nature, its policies about protecting habitats and trees, it is clear that the value of the features that will be lost (i.e. biodiverse rewilded habitat; red and amber listed bird species; protected species; numerous trees, wildflowers, invertebrates, birds and animals; part of a wildlife corridor, etc) outweigh the “need” for the proposal. For example:

- Loss of a rewilded habitat that has naturalised over the past 25 years. Rewilded habitat and trees planted naturally are recognised to be of more value to biodiversity and wildlife than artificial tree-planting or habitat-creation schemes. The loss of Rose Hill is therefore unlikely to be replaced - and if it is somehow replaced, this will not occur for at least 25 years. Similarly, it is unlikely that any biodiversity net gain, let alone a gain of 10% or over, will be able to be achieved to replace Rose Hill.
- The loss of breeding territories for red and amber-listed birds, as well as many other more common birds. The ecology report states that *“red and amber listed bird species of conservation concern were spread across the Site, with **all areas of the Site offering valuable habitat** [emphasis added]. Green listed species, not currently of conservation concern, were widespread, again with **all areas of the Site offering value for these species.**”* The ecology report further notes that the reason for the long-term declines of the specific red-listed (50% for song thrush and 55% for linnet) and amber-listed (29% for dunnoek and 44% for willow warbler) birds found on site is due to *“loss of breeding and foraging habitat”*, i.e. exactly what the proposed development at Rose Hill will do.

It should be noted that as well as the red-listed birds noted in the developer’s preliminary ecology report, a pair of grey partridge (also red-listed) have been seen on the site and reported to the Doncaster Records Centre. A further bird breeding survey performed during the breeding season (which may well identify further red and amber listed species) was recommended in the ecology report, but none appears to have been performed.

The ecology report also highlighted the value of the habitat on Rose Hill to birds: *“The high proportion of species noted exhibiting breeding behaviour, with a variety of different nesting styles (cavity, constructed in trees and constructed amongst ground vegetation/scrub) shows the value of the [habitat on the site]”.* NB: The paragraph in the ecology report itself is incomplete but its meaning is clear.

- The loss of a significant area of habitat for animals, butterflies and insects. It should be noted that no invertebrate study appears to have been carried out by the developer to assess the species on site, and the loss that will be caused by development. In this regard, the Doncaster Naturalist Society has visited Rose Hill and noted that *“across the established grassland were numbers of large ant nests, possibly the work of the Yellow Meadow Ant (*Lasius flavus*)”.*

*Interestingly these structures had developed a vegetation of their own ... They may also host a range of specialist invertebrates which depend on the ants".*

- The loss of significant numbers of trees and areas of young regenerating woodland (see also comments on Policy 32 below).
- The loss of wildflowers and other flora (including orchids and bluebells). In this regard, as stated in the ecology survey, *"the survey was carried out in early Spring when many floral species are not yet in growth. Further survey within the summer growing season is recommended to ensure more important grassland habitats have not been overlooked."* No such further survey appears to have been performed and the ecology survey is therefore deficient.
- Loss of hunting territory and insects for bats. Replacing nearly 17 acres of habitat with 121 houses, concrete and tarmac will clearly result in a significant reduction in the number of insects, and therefore food for bats which presently use the site as hunting territory (as evidenced by the preliminary ecology survey).
- Loss/degradation of part of a wildlife corridor with consequent impact on biodiversity across the borough (see comments on Policy 29).
- Degradation of the nearby Local Wildlife Site at Red House Plantation from having a housing estate built right next to it.

#### **Details of non-compliance with the Environmental Strategy**

A stated priority for the natural environment set out in the Environmental Strategy is to *"protect and enhance **WOODLAND** and **GREEN SPACES**, plant more **TREES**" and "protect and enhance **BIODIVERSITY** to support resilient ecosystems."* The proposal to destroy Rose Hill does none of these things since it results in the loss of woodland, green spaces and trees, and does nothing to protect and enhance biodiversity or support the environment (rather it does the opposite).

The Environmental Strategy also states:

- there is an ambition to *"increase the proportion of land given over to woodland, wood pasture, wildflower grassland and thus support greater biodiversity"*. Given that Rose Hill contains areas of young regenerating woodland and wildflower grassland, the proposal to build on Rose Hill works against this ambition.
- there is *"a presumption against developments that result in loss or deterioration of woodland/trees."* Application of this policy means that the proposal to develop Rose Hill should be rejected on these grounds alone.
- there is an aim to *"enhance the biodiversity value of all public open spaces, as key connecting components of ecological networks and sites supporting access to nature"*. As noted earlier, the proposal will destroy the biodiversity value of this public open space and destroy/degrade a component of an ecological network and a site supporting access to nature.
- there is an aim to *"connect more people with the natural environment and improve access to nature"*. The proposal does the opposite by destroying a natural environment already used by people to connect with nature, and therefore reduces their access to nature instead of improving it.

## Other comments

Doncaster Council has stated that *“In the past 50 years the UK has experienced declines in two thirds of its plant and animal species. Whilst there are a range of reasons for this, a loss of habitat is a significant factor. Through rewilding certain areas across Doncaster, we hope that we can provide new habitats to protect the many species that are native to our borough. Not only that, but the 'rewilded' areas have allowed for the growth of hundreds of plants and wildflowers.”*

The Council therefore recognises that loss of habitat is a significant factor in the decline of biodiversity. It therefore makes no sense to destroy an already naturalised area of habitat (which already supports native species and hundreds of plants and wildflowers) when it is recognised that such an action will lead to a significant impact on biodiversity.

The ecology report also makes reference to Rose Hill being “scrubland” as if this is some lower grade habitat of no ecological value. On the contrary, scrub is a valuable habitat, often being a transition stage between open grassland and woodland (which is exactly what is happening at Rose Hill).

The following quotes regarding the value of scrubland are from the following website:

<https://www.suffolkwildlifetrust.org/conservationadvice/meadows-and-grassland/grassland-and-scrub>

*“Scrub can be very valuable for a wide range of wildlife, providing a continued source of nectar, fruits, seeds, shelter, breeding and roosting sites. A stand of scrub with varied plant species, age and structure will support a great variety of species. By ensuring that scrub – the transitory stage between open habitats such as grassland and closed canopy woodland - is part of your habitat mosaic you will be providing food and shelter for invertebrates, amphibians, reptiles, mammals and birds.*

### ***“Importance of scrub for wildlife***

*“Invertebrates - Some tall herbs, often associated with scrub edge, are vital to many grassland invertebrates that need nectar-rich shrubs to complete their lifecycles. Species such as blackthorn, hawthorn, bramble and herbs provide early pollen and nectar [All these plants grow on Rose Hill], as well as foraging habitat for herbivorous and predatory invertebrates in both adult and larval stages. Standing and fallen dead timber is valuable habitat for fungi and wood-boring insects.*

*“Amphibians and reptiles - Amphibians and reptiles prefer south facing areas of scrub for basking and hibernation sites, for example south facing heathland gorse scrub edges provide basking for adders. Scrub can also be used as a wildlife corridor to link habitats such as wetland areas for amphibians.*

*“Birds and mammals - Scrub is commonly used by birds such as bullfinch, yellowhammer, linnet, willow warbler, wren, blackbird, dunnoek, long-tailed tit and turtle dove [Most of these birds have been seen on Rose Hill. For example, the ecology report notes that the amber-listed species “Willow warbler Phylloscopus trochilus (4 territories) was recorded across the Site, with the mix of scrub and long, unmanaged grassland providing ideal habitat for this species.] ... Fruits and seeds are a particularly important feature of scrub which provides autumn and winter food for resident and migrant birds and mammals.*

*“Certain species will show preferences for certain structures of scrub for example yellowhammer and linnet nest in low, dense scrub edges that are thick at the base; whereas song thrush nest in*

*thick cover, preferring mature scrub, and feed in short marginal vegetation.* [Linnet and song thrush, both red-listed birds, are reported by the ecology survey to be nesting on Rose Hill]

*“Raptors will often use scrub for roosting in winter and hunting small birds and mammals [Raptors such as kestrels have been seen on Rose Hill]. Long-eared owl will utilise the old nests of magpie in denser scrub areas ....”.*

The development of Rose Hill is therefore destroying a valuable habitat, and one which is transitioning in parts to woodland, and therefore expanding the adjacent Local Wildlife Site at Red House Plantation. Destroying an area where nature has recovered and has already flourished, and where it continues to recover and flourish, is contrary to the Council’s environmental policies and the actions needed to address the Climate and Biodiversity Emergency.

## Conclusions

The proposal will lead to a significant loss and/or deterioration of biodiversity and is contrary to many of the Council’s policies set out in the Local Plan and its Environmental Strategy. The proposal should therefore be rejected.

## Impact on adjacent Local Wildlife Sites - Policy 31 (Local Wildlife and Geological Sites)

The Planning Brief recognises that building on Rose Hill will adversely impact the Local Wildlife Site at Red House Plantation. The Planning Brief requires that *“an Ecological Assessment of Redhouse Plantation prior to development commencing will be required in order to assess the impact of development on the LWS and to guide the refurbishment works/management regime.”* No such assessment has however been performed.

Policy 31 and the Environmental Strategy both also state that the conservation value of non-designated sites may change over time and it is expected that new sites will come forward for designation, and that it is an objective of the Council to increase and expand the number of, and size of, Local Wildlife Sites. The Council should therefore carry out the appropriate surveys to determine whether or not Rose Hill fulfils the criteria to be designated as a Local Wildlife Site. It would be foolish – and indeed negligent - to destroy a site which if not already fulfilling the relevant criteria has the capacity to become a Local Wildlife Site in the foreseeable future.

Given the above, the Council should not permit development on Rose Hill and should instead preserve and protect the site, and work towards turning it into an extension of, or a new, Local Wildlife Site.

## Significant loss of trees and/or woodland - The development is contrary to Policy 32 (Trees, hedgerows and woodland)

### Introduction

It is clear from a visit to Rose Hill that it supports a significant number of trees. Most areas of Rose Hill support individual or small areas of trees, although across the centre of the site, there is a significant area of trees/young woodland. The trees on Rose Hill are particularly significant in terms of biodiversity and supporting nature since:



- a) they have naturally rewilded on the site over the past 25 years or so, and are therefore native trees which are naturally helping to create and support biodiversity on the site;
- b) they are located on a wildlife corridor and therefore support wildlife as it moves across the borough; and
- c) are part of a natural habitat and ecosystem that is supporting a wide range of wildlife, including providing nesting sites for red and amber-listed birds, as well as many other bird species.

There are few, if any, similar locations in Doncaster that have naturally created such habitat on a wildlife corridor, which are next to two existing Local Wildlife Sites, and that are so tree-rich.

In addition, given that many trees on site are now well-developed (with new ones appearing all the time due to the natural rewilding of the site), Rose Hill is playing its part in combatting climate change by sequestering carbon and providing all the other benefits that trees provide to nature and people, which the Council sets out in its Local Plan and various environmental strategies.

As shown below, the development of Rose Hill will result in the destruction of all trees in the main area of the site, contrary to the policies in the Local Plan, and the Council's Green Infrastructure and Environmental Strategies regarding the protection of trees. In particular, the Council's Environmental Strategy states that there is "*a presumption against developments that result in loss or deterioration of woodland/trees.*" This policy means that the proposal to develop Rose Hill should be rejected on these grounds alone.

#### **Details of non-compliance with the policies set out in the Local Plan**

***"Proposals will be supported where it can be demonstrated that woodlands, trees and hedgerows have been adequately considered during the design process, so that a significant adverse impact upon public amenity or ecological interest has been avoided".***

No adequate consideration has been given to the impact of the proposal on the developing woodland and/or trees on Rose Hill. Rose Hill supports a significant number of trees spread across the main area of the site, all of which will be removed as part of the proposed development. There will therefore be a significant adverse impact upon public amenity (as a result of the destruction of trees and young woodland in a green open space widely used by the public) and upon ecology (see earlier comments and further comments below).

#### **The tree survey**

The development proposal is accompanied by a tree survey. The tree survey was performed in March 2021, i.e. around 18 months ago at the time of writing. In this regard it should be noted that paragraph 4.10 of the tree survey states "*the data gained during the original survey provides an indication of the health of the trees. However, it does not enable a comprehensive assessment of their condition over time. Trees are living organisms which are affected by many factors including weather conditions, diseases/ disorders, light levels and human activities. Due to this, the report is only valid for a period of 1 year from the date of issuing.*" There is no evidence that any further survey work has been performed since March 2021. It therefore appears that according to the tree survey itself, the report is based on out-of-date information, and is therefore invalid.

Notwithstanding the above, the tree survey appears to underplay the amenity and environmental value of the trees on the main area of the site and does not adequately assess the impact of this development on public amenity or ecological interest. Further the findings of the tree survey have not been considered in the design process. In this regard, the conclusions of the tree survey can be

summarised as follows: if a tree is anywhere except on the boundaries of the site, it is to be “*remove[d] to facilitate the development*”. Not one tree in the main area of the site is to be retained, even if its retention is stated to be “desirable” in the tree survey.

Specifically, the tree survey states that four trees, and six “groups” (comprising five complete “groups” and part of one other “group”) of trees spread across the site, totalling “*approximately 115 trees that lie within the centre of the site*” require removal “*to accommodate the proposals*”. The Planning Summary reiterates this stating that “*An Arboricultural Impact Assessment has been prepared in support of this application and identifies four trees, five groups of trees and a part of one group of trees require removal in order to facilitate the development*”.

However as shown below, there are more than “four trees” and five or six “groups of trees”, comprising 115 trees in total, on the main area of the site. This means that more than 115 trees will be removed as a result of the development, contrary to what is stated in the tree survey.

With regard to the 115 trees which are referred to in the tree survey, it is stated that “*the majority of these are smaller self-set trees that have been given a category grading of ‘C’.*” This comment refers to the category gradings set out in Appendix 2 and Appendix 6 of the tree survey:

- “Category B: Retention desirable” and “trees of moderate quality and value with a reasonable life expectancy...”; and
- “Category C: Tree which could be retained” and “trees of low quality and value but which are in adequate condition to remain or are young trees...”

The following image shows the location of the 32 trees (i.e. around 28% of the 115 trees the survey claims grow on Rose Hill) in Category B (Retention desirable) marked in blue/ purple on Appendix 7 of the tree survey, and which are to be “remove[d] to facilitate the development” according to Appendix 1 of the tree survey:



According to Appendix 1 of the tree survey, of the four trees (T46, T49, T51 and T53) to be removed, all but T46 have a category grading of B (“retention desirable”). Of these trees, one (T53) lies on the edge of the open space at the top of the development but because this tree slightly impinges on a pavement, it is to be “*remove[d] to facilitate the development*”. A similar situation exists with T49 which is situated on a verge between road and pavement, but slightly impinges on the pavement and therefore must be removed. These instances show that no attempt whatsoever has made to inform the layout of the development from the results of the tree survey, as these trees could easily be retained by a small adjustment to the design.

Of the “groups” of trees which are to be removed, G50 (which appears to consist of 29 trees according to Appendix 6) is also designated as Category B and comprises not a single of group of trees in one location but instead consists of “*birch trees scattered across the site. Single-stemmed and multiple-stemmed specimens all well-established and displaying good form*”. All these Category B trees are however to be removed “*to facilitate the development*”. No attempt appears to have been made in the design layout to preserve any of these trees whose retention, according to the tree survey, is “desirable”. In this regard, one tree within G50 is located in a landscaped area near one of the bridle paths and does not appear to impinge on any proposed house, garden or road, but nevertheless it is still to be “*remove[d] to facilitate the development*”, presumably solely because it is growing in the main area of the site.

With regard to the “groups” of trees categorised as C (defined as “*tree which could be retained*” – although none are) and which are also to be removed:

- G9 is described as “*downy birch and a single Goat Willow, which provide some screening.*” This group forms part of the trees growing along the boundary with the railway line. Unfortunately for these trees, they are growing a little way into the site itself and would therefore impinge upon the gardens of the houses planned to be built here. Accordingly, they therefore need to be “*remove[d] to facilitate the development.*”
- G48 is described as “*a small group of probably self-set [young sycamore] trees. No major visible defects.*” No explanation is given as to why these trees have not been designated B like others with “no major visible defects” situated elsewhere on the site. These trees are located at the Avenue entrance to the site and so could easily be retained.
- G52 appears to comprise 6 trees and is described as “*semi-mature English Oak: single scattered Oaks. No major visible defects. Good future potential*”. Given this description, it is unclear why these trees in the main area of the site have been categorised as “C” instead of as “B”, particularly when the following trees (which lie on the boundary of the site) are being preserved and have similar descriptions:
  - G35: semi-mature English oak. “*A boundary group of smaller Oak providing screening. Good future potential and succession. No major visible defects. B1.*”
  - T37: semi-mature English oak. “*Twin-stemmed at ground level with a slightly unbalanced crown. Minor deadwood throughout. B2.*”

The probable reason for the different categorisation is that the trees in G52 are situated in the main area of the site and would therefore impact on the layout of the development if retained.

- The majority of the trees to be removed fall into the group G54: “*Young to semi-mature: Scattered trees across the site. Species include Sycamore, Oak, Rowan, Hawthorn and Birch.*” As

can be seen from Appendix 6, this is not a single “group” of trees as such but instead consists of a large number of individual trees or groups of trees of different species which are located in disparate locations all across the site. It is unclear why these trees or groups were not considered individually in the tree survey, or in smaller groups of the same species, as other trees have been.

It should be noted that a few trees included in G54 are however to be retained. There is no explanation in the tree survey why these trees are being singled out for retention out of all the trees in G54. A review of the layout of the development in Appendix 6 however provides the answer: it is because they are situated in the planned open space of the development. It therefore appears that trees within G54 are suitable for retention so long as they don’t get in the way of the proposed layout of the development (i.e. the layout is informing the results of the tree survey, and not the other way around as should be the case).

Having said the above, there are two trees within G54 which are located in a landscaped area near one of the bridle paths/estate roads and do not appear to impinge on any proposed house, garden, or road but which are still to be “*remove[d] to facilitate the development*”, presumably because they are growing in the main area of the site.

In addition no adequate description of the trees in G54 is given in the tree survey (e.g. their “future potential”, whether there are any “major visible defects”; any other relevant information such as descriptions of the crowns, etc). These trees of different ages, species and location appear to have been grouped together in a “catch-all” categorisation of “C” with a statement that they should be removed. There is however insufficient information in the tree survey to determine whether this assessment is correct, and whether some or all of these individual trees should in fact fall into category B and/or should be retained.

It should also be noted that trees categorised as category C in the tree survey are described as trees which “could be retained”, i.e. these trees are of sufficient age, quality and/or condition, or are young growing trees, such that they do have some “value” under the approach taken in the tree survey. As is the case with category B trees in the main area of the site however, no attempt has been made in the design layout to preserve any of these trees.

In summary therefore, the tree survey appears to have ignored its own categorisations by saying that many trees and groups of trees whose retention is desirable or which could be retained should instead be cut down “*to facilitate the development*”.

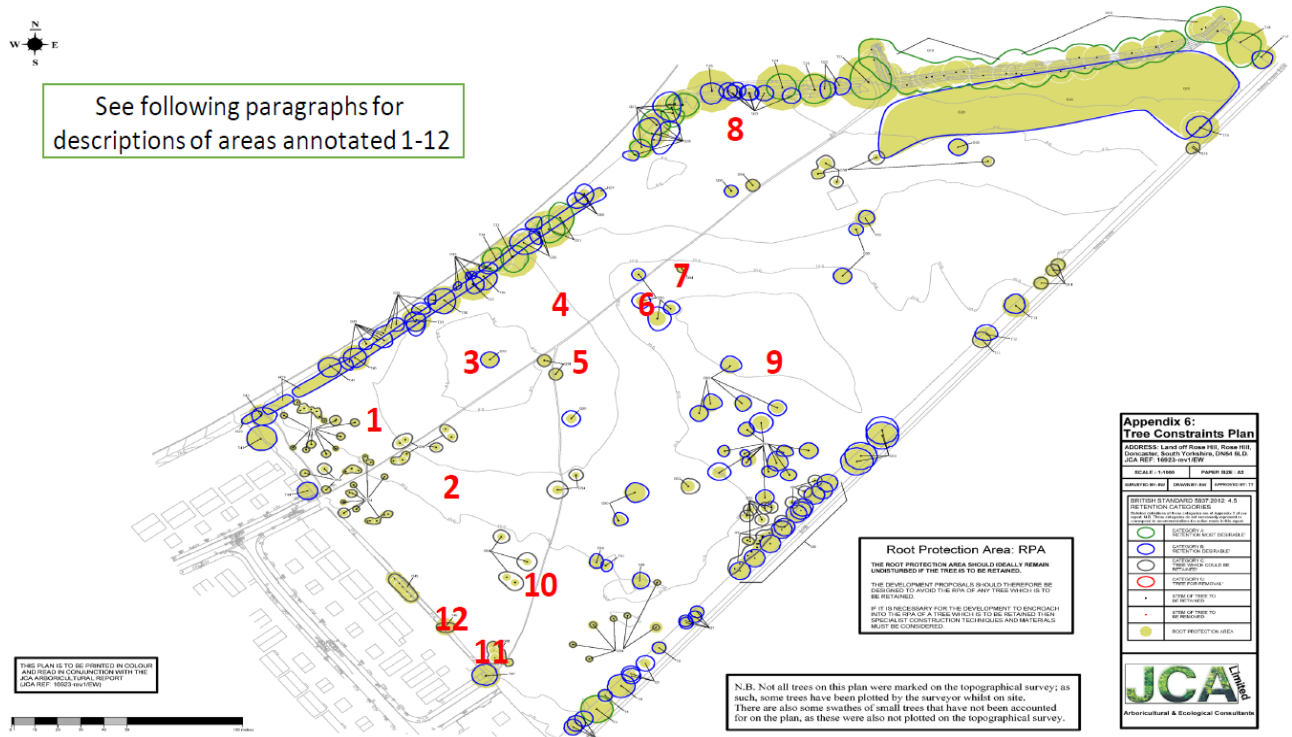
The Local Plan states that “*the layout [of any development on Rose Hill] should be informed by a tree survey*”. It appears however that the tree survey has not in fact informed the layout of the development as required by the Local Plan, but rather the layout of the development has informed the findings of the tree survey (i.e. if a tree is in the way of the development, no matter what its condition or characteristics, it needs to be removed).

#### *Further information regarding the extent of trees on Rose Hill*

As noted above, the tree survey states that only 115 trees are being removed from the site for the purposes of the development. This however is an underestimate of the trees on site that will in fact be destroyed by the development.

The images below are:

- a satellite image of Rose Hill. The date of this image is unknown but a recent visit to the site shows that there has been further tree growth on Rose Hill since this picture was taken; and
- the map of trees included in Appendix 6 of the tree survey, annotated with red numbers which refer to subsequent comments and accompanying photographs set out below.





It appears from a comparison of the satellite image and the map included in the tree survey that a number of trees, particularly across the centre of the site and between the racecourse boundary and bridle path, do not appear to be mentioned in the tree survey, or are incompletely described therein.

Some examples are set out below (all photographs taken in August/September 2022). All the trees in the photographs below are ones which are either specifically stated as needing to be removed “*to facilitate the development*” in the tree survey, or do not appear to be referred to therein.

**Area 1:** An area of trees situated to the north, a short way along the bridlepath as it enters the site from Rose Hill Rise, either do not appear to be referred to in the tree survey or are stated to be removed (It is difficult to tell from the map). These trees can be seen on the satellite image and in the photo below.





**Area 2:** The tree survey map at Appendix 1 gives the impression that there are hardly any trees in the triangular area between the bridle path leading from Rose Hill Rise and the bridlepath leading from the Avenue which diagonally crosses the site. There are however a number of trees in this area (see satellite image and photo below).



There are also groups of trees, shrubs and vegetation in this area, adjacent to the bungalows in the existing estate, again not mentioned in the tree survey (see photographs below).





**Area 3:** There is an area of trees to the north/ north-west of the bridle path leading off Rose Hill Rise, just below the junction with the diagonal bridle path across the site. These seem to be represented by a small group of trees (part of G50) in the tree survey. This however does not give a complete representation of the extent of trees in this area.





**Area 4:** The trees referred to above in Area 3 form part of a larger wooded area on the north-west of the site running from the junction of the two bridle paths to halfway up the bridle path which leads into Red House Plantation, and which forms an extension of the north-west boundary of the site. The ecology report refers to this area as follows: *“Along the north-west boundary is a dense area of birch woodland, with occasional oak and bramble . In association with adjacent bracken and laying on an acid substrate, this has the potential to succeed into an area of Lowland Mixed ( Birch/ Oak) Deciduous Woodland”*. The tree survey seems not to refer to the trees in this area. The satellite photo and the photos below show that this area appears to be young woodland (which aligns with the comments in the ecology report). Given the Council’s policies about the importance of protecting trees and woodland, this area should be therefore be protected and retained. It is clearly contrary to these policies to destroy such an area for development.

NB: A number of trees in this area were cut down in order to facilitate the archaeological survey. None of these trees have been replaced by the developer, either on or off-site.





**Area 5:** There is an area to the east of the junction of the two bridle paths, consisting of a compact group of well-established trees. No mention of this area seems to be made in either the tree survey or the ecology report.



Note that in the photograph above, in this one small area, at least 13 separate trees can be seen, i.e. over 10% of the trees which the tree survey says exist on Rose Hill.



**Areas 6 and 7:** There is a further wooded area/ group of trees on the eastern side of the bridle path as it runs from the bridle path junction up to Red House Plantation. Part of this area may be the small group of trees referred to as being part of G50 and/or G54. G50 is described as comprising *“single-stemmed and multiple-stemmed specimens all well-established and displaying good form.”* and are stated as needing to be removed *“to facilitate the development”*.





**Area 8:** A patch of grass and scrubland which contains some individual trees separates Area 4 referred to above from a further area of trees adjacent to the bridle path and which forms an extension of the Local Wildlife Site at Red House Plantation along the top of the site to the north/north-west of the bridle path as it enters Red House Plantation. None of these trees or the extensive vegetation in this area appear to be referred to in the tree survey. This area appears to be an extension of existing woodland and the boundary trees and hedgerows between Rose Hill and the Racecourse.





**Area 9:** As is evident from the satellite image of Rose Hill, there is a wooded area running across the centre of the site consisting of groups of trees and glades which extends from north-west to south-east/ from the bridle paths to the railway line. The tree survey comments on a certain number of trees and “groups” of trees (which include some Category B “retention desirable” trees) in this area, stating that they should be *“remove[d] to facilitate the development”*. In relation to this area, the ecology report states that *“the centre of the Site contains a large area of denser scrub with some open areas and glades. This is dominated by birch and oak, with other species such as ash, hawthorn and broom also present.”* This area contains many trees/young woodland which include some well-established trees (see photographs below).





**Area 10:** There are also areas of trees which are situated to the west of the bridlepath running diagonally across the site from the Avenue.





**Area 11:** G48 is described as “a small group of probably self-set trees. No major visible defects”. These trees are stated as needing to be removed “to facilitate the development” although they could easily be retained as they are right on the edge of the site at the Avenue entrance next to the bridlepath.



And just across from these trees on the eastern/other side of the path is this area, not referred to in the tree survey.





**Area 12:** T46 is described as needing to be removed “to facilitate the development” despite being a substantial tree on one of the boundaries of the site. As the photograph below shows, this is a reasonably mature and large tree which should, and easily could, be retained. This photograph also shows a number of trees to the west/right of T46 situated further into the site which do not appear to be mentioned in the tree survey.



It should also be noted that the satellite image shows a number of trees which are located in the planned open space at the north-eastern end/ top of the development. A number of these trees do not appear to be referred to in the tree survey and so it is unclear whether these will be retained or removed.



The above areas are just some examples of the individual trees and groups of trees on Rose Hill which appear to be either not referred to in the tree survey or are stated as needing to be removed *“to facilitate the development”*.

The tree survey further states *“it should be noted that a planting scheme is included within the proposals. This will act to mitigate tree losses”*. The proposal says that 78 trees will replace the (under-estimate of) 115 trees which it states are being removed, i.e. there will be a decrease in the number of trees (under the tree survey’s inaccurate assessment of the number of trees to be removed) of 32%. It is therefore clear that even under the proposal’s tree-count, the trees being removed are not being replaced, and that this development will lead to a reduction in trees, contrary to the Council’s tree policies. As shown above, given the actual number of trees on Rose Hill, the loss of trees caused by this development will be more than is stated in the development proposals.

The survey further claims that *“most trees within the site have limited arboricultural amenity and can be removed without considerably affecting the amenity of the site”*. Firstly, nowhere in the Council’s policies or strategies regarding trees does it make mention of *“arboricultural amenity”* as to whether or not trees should be protected or preserved. In fact, it is clear from the Council’s policies that all trees, no matter what their size, significance, species or age, should be protected. In this regard, it is worth noting that the Council considers newly-planted saplings to be *“trees”* in recording numbers for its *“Million Tree Target”*, and yet at Rose Hill no value seems to be attached to well-established healthy trees already making an impact against climate change, and providing biodiversity value and habitat for wildlife. The comments in the tree survey about certain trees having *“no arboricultural amenity”* are therefore not relevant. And as noted earlier, the tree survey states that trees, which under its own categorisations should be retained and therefore presumably have *“arboricultural amenity”*, are in any event to be removed.

It should also be borne in mind that any *“replacement”* trees will be saplings/very young trees and therefore presumably also of *“limited arboricultural amenity”*. Such trees are hardly a replacement for existing young, semi-mature and/or well-established trees, and therefore provide little or no *“mitigation”* for the losses of such existing trees which will be caused by this development.

Secondly, the comment that by the tree survey’s own count, 115 trees can be removed without *“considerably affecting the amenity of the site”* is without foundation. The current *“amenity”* associated with the site is that of a biodiverse green open space and habitat containing many trees and which is enjoyed by the local community as a place for recreation and to connect with nature. How does the removal of a key aspect of the site’s present amenity not result in a considerable impact on the amenity of the site?

### Conclusions on the tree survey

Given the above, this proposal does not comply with Policy 32, i.e. no adequate consideration of woodlands and trees has been performed in the tree survey and/or during the design process, and there will be a significant impact on public amenity and ecological interest caused by this proposal.

***“Proposals will need to include: A) the submission of survey information of woodland, trees and hedgerows, as appropriate, to a recognised professional and fit for purpose standard which is able to demonstrate evaluation of these features for realistic long-term retention, and how this has positively informed the design process;”***

As shown above, the tree survey is out of date and does not appear to adequately survey the woodland and trees on Rose Hill. The trees and woodland on site have not been considered for

long-term retention and have not positively informed the design process. On the contrary, where trees and woodland would impact the proposal, they are simply to be removed.

In fact rather than woodlands, trees and hedgerows “positively” informing the design process, the reverse seems to be the case: the design has informed the results of the tree survey. In relation to trees on the main area of the site, the tree survey seems to serve no purpose as all trees are to be removed “to facilitate the development”.

***“D) sufficient provision of appropriate replacement planting where it is intended to remove trees and hedgerows”***

The trees which are to be destroyed by the development are not being replaced. The number of new trees it is proposed to plant will lead to a significant reduction of trees and will not go anywhere close to replacing those lost. Even given the underestimate of 115 trees being removed per the tree survey, this results in around a third of the alleged trees on site not being replaced. The development proposal does not therefore provide “sufficient provision” of “replacement planting” as is required under the policy.

***E) avoidance of the loss or deterioration of woodland***

As noted earlier, areas of Rose Hill comprise young woodland, or are well on the way to becoming woodland. These areas are being lost as a result of the proposed development. In addition, the Local Wildlife Site at Red House Plantation which consists of woodland is directly adjacent to the proposed development and will deteriorate as the result of its close proximity.

The development will also likely ultimately result in the loss or deterioration of the trees that are being retained. For example, the trees and hedgerows forming the boundary between the Racecourse and the development will block the view of the racecourse from the “executive homes” that are planned to be built along this boundary. How long will it be before these trees and hedgerows adjacent to the racecourse are “pruned” or removed entirely to provide a view for householders?

***“A pleasant and attractive environment including woodlands, trees, shrubs and other green assets contributes to maintaining and improving the quality of life for people living and working in Doncaster ...”.***

The existing “pleasant and attractive environment” at Rose Hill of “woodlands, trees, shrubs and other green assets” is being completely destroyed by this proposal. It will not maintain or improve the quality of life of the people in the borough who use this area for recreation and to connect with nature.

***“The evaluation of these existing assets is an important part of the design process for development proposals.”***

As noted earlier, there has been no proper evaluation of the existing green assets at Rose Hill as part of the design process.

***“Retaining positive green infrastructure assets wherever possible ensures the environment is not damaged and that these assets are available for the benefit of future generations. This is particularly important for woodlands ....”.***

The proposal does not (i) retain positive green infrastructure assets (e.g. trees, woodland, the wildlife corridor); (ii) damages the environment; (iii) destroys green assets; and (iv) will destroy and/or damage woodland.

***“Trees can also confer economic benefits to Doncaster through the provision of ‘ecosystem services’. Such services include the production of oxygen, the capture and storage of carbon, the removal of pollutants from the air and the slowing of storm water run-off. Trees are an essential component of urban biodiversity providing food and shelter to many important native and migratory birds and animals and provide a vital resource of deadwood for many invertebrates”.***

All the benefits of the trees on Rose Hill referred to above are being destroyed by this proposal despite these trees being “an essential component of urban biodiversity” and providing a habitat for nesting territories for red and amber-listed birds, and a wide variety of other birds, insects and mammals.

Further the tree survey refers in many instances to there being deadwood on site and/or forming parts of existing trees. Any such deadwood/trees which lie anywhere other than the site boundaries is however to be removed, thereby destroying the “vital resource of deadwood” referred to in the quote above.

***“The retention of trees and hedgerows that are present on or adjacent to a site is a consideration whether or not they are protected”.***

As noted earlier, no consideration has been given to retaining the trees growing all across Rose Hill.

#### **The development is contrary to the Council’s many other policies regarding trees**

Listed below are some areas of the Council’s policies regarding trees.

##### Environmental Strategy

***“Our parks, green spaces, and woodland enhance our settlements, providing places for us to relax and exercise, while at the same time providing areas where nature can flourish.”***

This proposal will destroy green space and woodland and adversely impact not just the estate immediately next to Rose Hill, but the wider area of Bessacarr, Cantley and Lakeside whose residents use the area for recreation. It will also destroy an area where nature is already flourishing.

***“Aim – Protect and enhance existing woodland and green space; Increase overall tree cover and woodland cover”. “Outcome – improved green space provision and increased tree coverage.”***

This proposal does the exact opposite of the above, namely destroy and degrade existing woodland and green space, and reduce overall tree and woodland cover. It also leads to reduced green space provision and reduced tree coverage.

***“Ensure that open space, woodland, trees and hedgerows are adequately considered in new developments, with a presumption against developments that result in loss or deterioration of woodland/trees.”*** [emphasis added]

The development of Rose Hill will result in the loss and/or deterioration of trees and areas of woodland contrary to this specific policy. The Council should therefore apply its stated presumption against such development and reject the proposal.

Further as noted earlier, open space, woodland and trees have not been adequately considered in relation to this proposal as all trees located anywhere other than on the site boundaries are to be chopped down.

### Green Infrastructure Strategy

Paragraph 3.22 states *“Increasing the area of woodland with open access and attractively landscaped open spaces close to our urban areas is an important way of promoting exercise and a healthier lifestyle. Research has also shown a link between high quality natural environments and improved sense of wellbeing and reduced stress”*.

This proposal will reduce the area of woodland and open spaces close to an urban area.

Paragraph 3.23 states *“Trees make a major contribution to the appearance of the borough. They are one of the main ‘architectural’ elements in many of the most important townscapes and landscapes and an essential component of its biodiversity. They provide food and shelter to many important native and migratory birds and animals and provide a vital resource of deadwood for many invertebrates, with large, mature, native species, veteran trees and woodland having the greatest value. Increasing tree coverage can help improve both the amount of habitat and connectivity between habitats to assist wildlife movement.”*

The proposal will decrease tree cover and the benefits trees provide to biodiversity.

Paragraph 3.24 states *“The perceived value of trees varies greatly amongst Doncaster’s residents and communities and the tree resource is being placed under increasing pressure as a reaction to real or perceived problems, increased contact with human activity and through the demand for land for development and economic growth. As space within the borough becomes ever more constrained and valuable it becomes more difficult to find the room to plant and sustain the trees that deliver the most significant benefits- those which are the biggest and the most long-lived. Integrating trees and woodland into an interconnected network of green spaces across the borough is being seen as an increasingly valuable part of urban growth to create liveable neighbourhoods and offset the impacts of climate change”*.

Given this, the Council should not be allowing the destruction of an area of trees and woodland already on “an interconnected network of green spaces” and a significant element in making a “liveable neighbourhood” and which is already acting to combat climate change.

*“Every opportunity will be taken to establish new trees and expand our woodland estate on appropriate sites within the Borough”*.

There is clearly an opportunity to allow nature to continue to plant new trees on Rose Hill (as well as for the Council to plant new ones there), and to expand the woodland estate by allowing Rose Hill to expand the woodland at adjacent Red House Plantation.

### Statements about the value of trees as set out in the Council’s Tree Policy

Given the proposed development will result in the loss of significant numbers of trees and the loss of woodland/ emerging woodland, the proposal is contrary to many objectives set out in the Council’s Tree Policy (emphases added where necessary). For example:

*“To safeguard the borough’s existing tree and woodland resource ....*

*“To establish more trees and expand and develop woodland across the borough ....*

*“To protect wildlife and enhance the ecological value of the borough’s trees, woodlands and non-woodland habitats and improve their resilience to climate change*

*“To protect and enhance WOODLAND and GREEN SPACES ...”*

This proposal does none of the above – and in fact, does the opposite.

*“Trees, wherever they stand, make a valuable contribution to the quality of life for Doncaster’s residents. The urban forest is one of the most visible parts of the green infrastructure network and provides a multitude of benefits for society. The research establishing that trees are a cost-effective way of bringing a wide range of benefits to the environment, individuals and society as a whole also shows clearly that benefits are strongly related to size, with the largest trees providing the greatest benefits. It is important, therefore, that trees, particularly large canopied species, are not unnecessarily lost from the landscape.”*

Any benefits to the environment, individuals and society of the trees on Rose Hill are being lost as a result of this proposal.

*“Trees, particularly mixed native trees and woodland, can provide the conditions to support a wide range of other plant, insect and animal life. It needs recognising that individual trees are part of a local natural landscape: birds and insects will travel and forage across local environments between trees, hedges, shrubs and bushes irrespective of the ownership of the land on which these grow. Biodiversity is enhanced by having connecting habitats ....”*

This proposal destroys mixed native trees and woodland which is part of a local natural landscape, and part of connections between habitats.

*“Tree canopy cover is “the layer of leaves, branches and tree stems that cover the ground when viewed from above”. Its measurement can be used as a proxy for the benefits provided by the urban forest - the greater the area of canopy cover the greater the environmental benefits provided by trees. Doncaster’s tree canopy cover (including both municipal and private trees) has been estimated at 12.62%. However, this is the lowest canopy cover in South Yorkshire (average of 16.4%) and below the average for England (16% - based on 283 towns and cities) and ranges across the borough from 7.2% to 23.5%. The Urban Forestry and Woodland Advisory Committee Network recommend that a minimum standard for tree canopy cover is set for a local area, with evidence showing that 20% is a good aspiration for a borough like Doncaster”.*

This proposal will reduce Doncaster’s tree canopy cover, not increase it.

## **Conclusions**

This proposal results in a significant loss and/or deterioration of trees and/or woodland which is contrary to the Council’s policies set out in the Local Plan and in its Environmental and Green Infrastructure Strategies – and in particular the specific policy which states that the Council will apply “a presumption against developments that result in loss or deterioration of woodland/trees”.

Further, the layout of the development has not been informed by a tree survey. On the contrary, the development results in the removal of all trees in the main area of the site and there is no indication that any consideration whatsoever had been given to retaining such trees in the design. In addition, the tree survey does not identify all trees on site and is in any event invalid given the date on which it was prepared.

Accordingly, this proposal should be rejected.

## **Material negative impact of development on the local community/ loss of amenity**

The proposed development will lead to a material negative impact and loss of amenity to the local community for the following reasons:

- Loss of local green open space (as per earlier comments).
- Loss of area used for recreation and to enjoy and connect with nature (as per earlier comments).
- Additional traffic caused by the development (see later comments).
- The proposal will destroy the quiet nature of the area. The additional 121 houses will lead to further traffic on the quiet estate roads, and noise and disturbance to the residents whose homes are directly adjacent to the field.
- The existing estate contains an area of bungalows, a number of which are adjacent to the area of the proposed development. The plan is to build two-storey houses behind the bungalows resulting in them being overlooked in an unacceptable manner.
- Since the vast majority of the development consists of two-storey dwellings – and the adjacent existing houses consist of bungalows – the design of the new development is not of a character which fits in with the existing area. The introduction of a development of 121 houses with floor levels higher than adjacent properties is bound to have an impact on the character and appearance of the area.
- The site and its surrounding area is a relatively flat landscape consisting of the open area of the Racecourse and the woodland at Red House Plantation. Residents on the Rose Hill estate and on the adjacent Cantley estate on the other side of the railway line currently enjoy a pleasant open aspect and view across a natural landscape of trees and green open space. This will be destroyed by the development which will have a significant detrimental impact on the character and appearance of the area.
- It is also evident from the plans that garages are to be built within an unacceptably short distance from the curtilage of existing bungalows.
- The development is out of character for the area. The existing Rose Hill estate has a high proportion of elderly and retired people who live in the area due to its peacefulness and tranquillity. This character will be destroyed by the new development, which principally consists of large two-storey houses, and will result in additional traffic and noise.
- The Planning Report states that a benefit of the scheme is that *“a strong connection with Doncaster Common will be delivered which will offer attractive views for residents, particularly along the northern boundary.”* Firstly, it is clear from the plans that only 14 houses (the so-called “executive homes”) will likely have views of Doncaster Common. No consideration seems to be given to the “attractive views” over Rose Hill towards Red House Plantation and Doncaster Common enjoyed by existing residents and users of the site which will be destroyed by this development. Only the promotional selling points desired by the developers for their new estate seem to have been given any consideration.
- The proposed development will result in additional air pollution and decrease in air quality as it is not located in a position which will allow an appreciable level of sustainable transport to be used. Instead it will encourage and increase car usage.

## Policy 41 of the Local Plan

Policy 41 of the Local Plan (Character and Local Distinctiveness) states that development proposals will be supported where they:

*“1. recognise and reinforce the character of local landscapes and building traditions”*. The proposed development does not recognise or reinforce the local landscape. Quite the opposite – it destroys a green open space that serves as a pleasant area for recreation and a buffer to existing Local Wildlife Sites.

*“2. are of a high quality design that contributes to local distinctiveness”*. The proposal by Miller Homes is to place standard modern houses with no distinctiveness and no connection to the existing local area on a greenfield site.

*“3. respond positively to their context, setting and existing site features, respecting and enhancing the character of the locality”*. Any existing site features are being destroyed and the development does not respect or enhance the character of the existing locality: on the contrary, it destroys the very things that make this area a pleasant place to live.

*“4. integrate visually and functionally with the immediate and surrounding area at a settlement, neighbourhood, street and plot scale”*. As noted above, the proposed development is completely different in appearance and function to the existing estate and will not integrate in any way with the adjacent neighbourhood.

The proposal is therefore contrary to Policy 41.

## Policy 44 of the Local Plan

Policy 44 of the Local Plan (Residential Design) states that *“developments must protect existing amenity and not significantly impact on the living conditions or privacy of neighbours or the host property (including their private gardens), be over-bearing, or result in an unacceptable loss of garden space”*. As noted above, since the vast majority of the development consists of two-storey dwellings – and the adjacent existing houses consist of bungalows – the design of the new development is not of a character which fits in with the existing area. The introduction of a development of 121 houses with floor levels higher than adjacent existing properties is bound to have an impact on the character and appearance of the area. The proposed development will not protect existing amenity and will significantly impact upon the living conditions and privacy of those living on the existing adjacent residential estate.

The proposal is therefore contrary to Policy 44 of the Local Plan.

## NPPF

Paragraph 130 of NPPF states that *“planning decisions should ensure developments will function well and add to the overall quality of the area, are visually attractive and optimise the potential of the site”*. This proposal does not *“function well and add to the overall quality of the area”* for the reasons stated above and as set out in the section of this document relating to transport issues.

Further the development is not *“visually attractive”* (as it places a significant development next to two Local Wildlife Sites and within what is basically countryside) and does not *“optimise the potential for the site”* (since it destroys a site with great potential to protect and increase biodiversity in the area). It also clearly does not add to the *“overall quality of the area”* as it will

destroy a green open space widely used by the local community for recreation, and will destroy the peaceful and nature-rich qualities of the area forever. The proposal is therefore contrary to NPPF.

### **Conclusions**

The proposal will lead to a material negative impact on the local community and a significant loss of amenity and should therefore be rejected.

### **The bridlepaths**

There are three bridlepaths on Rose Hill. The present design retains these bridlepaths but these now, instead of being pleasant paths through open grass, scrub and trees and a beautiful natural setting, will run through a housing estate and/or alongside busy estate roads and traffic. As it runs into Red House Plantation at the top of the site, the bridlepath will also cross the estate loop road which runs round the perimeter of the site.

The amenity of the bridlepaths is therefore being destroyed by this development. The value of the bridlepaths to horse-riders is that they are natural paths that pass through a pleasant natural environment consisting of trees, scrubland and grassland. Replacing that environment with a path through a housing estate next to a busy estate road destroys the amenity or value associated with the bridlepath.

In this regard, Policy 19 (Access, Design and Layout of Public Rights of Way) states that “*any existing or alternative route alignments through development sites should run through open, landscaped areas and should avoid the use of estate roads ....*” For example, no attempt has been made to run the bridleway leading from Rose Hill Rise through “open, landscaped areas”. Instead it runs next to the main estate roads across the estate. The proposed design is therefore contrary to Policy 19 and if the proposal proceeds, a redesign to comply with this policy should be made.

### **Conclusions**

The proposal destroys the amenity associated with the bridlepaths and in any event, is contrary to Policy 19. The proposal should therefore be rejected.

### **The development will lead to significant loss of amenity/ issues relating to traffic**

The site is bordered on three sides by the Racecourse, Red House Plantation and a railway line. The only access to the site is therefore through the existing Rose Hill estate.

The Rose Hill estate currently consists of around 170 homes. The addition of a further 121 houses will therefore increase the size of the estate by around 70% thereby creating what will effectively be one of the, if not the, biggest cul-de-sacs in Doncaster.

The only access to the Rose Hill estate – and therefore to the site – is through two entrance points on the A638 Bawtry Road. These roads (Rose Hill Rise and the Avenue) can only be accessed from the outbound side of the Bawtry Road dual carriageway heading out of town, which means all traffic entering the estate has to come from the direction of the town centre. Traffic heading into town can only access Rose Hill by using a traffic-light controlled U-turn on the dual carriageway and then heading a short distance out of town before turning into the estate off Bawtry Road.

There is only one exit point from the Rose Hill estate – Rose Hill Rise, which is the access point nearest town. The other access point (the Avenue) cannot be used as an exit as it is too close to a



pedestrian crossing and the Cantley traffic lights. In order to head towards town, traffic has to exit Rose Hill Rise by turning left onto Bawtry Road, cross to the inside lane of the dual carriageway within a relatively short distance, and then take a U-turn at the traffic-light controlled junction at Cantley lights.

Bawtry Road is a busy dual carriageway and 'A' road (A638) and is the primary route from Doncaster to Cantley, Bessacarr, Rossington, Auckley, and other areas to the east of the centre. Traffic wishing to leave the estate already often has to wait a considerable period of time before it can exit Rose Hill Rise onto the dual carriageway. Given the additional traffic that will be caused by the development, this will likely result in queues of vehicles waiting to exit the estate at certain times (especially at peak hours), something which is recognised in the Local Plan which states *"the concentration of outbound traffic at peak times is likely to result in excessive queuing on Rose Hill and potential unacceptable queuing and delays for motorists."*

It is also likely that the additional traffic from the estate will cause queues on Bawtry Road, particularly at peak times. The slip road in which traffic must wait before making a U-turn at Cantley Lights will become full and the queue of cars will lead back onto the dual carriageway, particularly during term time when large numbers of cars use the U-turn to drop off/ pick children up from Hall Cross Lower School.

In addition, the existing estate roads will become more dangerous and congested. The estate roads are not particularly wide and there is much parking on the road by residents, visitors or tradesmen. In this regard, it should be noted that the Avenue has smaller paving areas and grass verges (and no grass verges at all in places) and therefore vehicles are commonly parked on the road. To access the site from the Rose Hill Rise entrance involves negotiating a blind 90-degree right-hand bend, whilst to access it from the Avenue involves turning off Bawtry Road into a short winding section of road on which cars are commonly parked (by those visiting the hairdressing salons, shop, or estate agent) and later involves driving round a 90-degree left-hand bend, followed shortly thereafter by a 90 degree right-hand turn at a junction.

Given the width of the estate roads and the parking of vehicles on the road or on verges, often cars have to wait for others to pass before continuing on their way. The increase of the size of the estate will therefore lead to increased risk for pedestrians, cyclists, horse riders (coming from the bridle path) and motorists.

The design of the development also means there will effectively be the creation of a long straight "racetrack" running from the top of the site next to Red House Plantation (which at one point runs over a hill) before it approaches the 90-degree bend on Rose Hill Rise. This is a dangerous design/ layout and will create even more issues and risk, primarily for residents of the existing estate.

No thought or consideration appears to have been given to how cars will likely use the various access points and roads within the estate post-development. It is likely that most cars will enter the estate at the Rose Hill Rise entrance (the one nearest town). Those who live on the eastern side of the proposed development will likely cut across to the eastern entrance to the site from Rose Hill Rise by using either Moorland Grove or part of the Avenue running parallel to the site boundary, turning what are now quiet residential streets into commonly used roads. Similarly when exiting the estate, motorists will also likely use these same streets as "rat runs" across the estate to get to the exit on Rose Hill Rise.

In addition, no consideration has been given to how these roads – or indeed the junctions on Bawtry Road - will cope with the construction traffic during development. The development is proposed to

last 10 years – 10 years that will see, not just increased traffic from the development, but construction lorries attempting to negotiate narrow estate roads and 90 degree turns, manoeuvre past parked cars, and waiting at the Rose Hill Rise exit to turn onto Bawtry Road, and causing queues at the U-turns on Bawtry Road. 10 years of such disruption will lead to significant loss of amenity and disturbance to existing residents and make their lives a misery.

The traffic from the development and the construction traffic will also lead to a reduction in air quality in the area, and dilapidation of the existing roads.

Further the Transport Assessment prepared on behalf of the developer and used to support the view that there are no reasons on highways or transport grounds why the development should be refused appears to contain many errors or inappropriate assumptions. For example:

- The junction count surveys at Table 2.1 were carried out on 9 June 2021. At this time, there were still some Covid restrictions in place (i.e. Step 3 of the lockdown measures was in place) and there was still an extensive amount of working from home. Accordingly it is unlikely that traffic levels were “back to normal” as stated in the assessment, particularly since school traffic travelling to Hall Cross School would still be lower than normal at this time.
- There is a similar issue with the traffic counts on Bawtry Road performed between 9 and 15 June 2021.
- The TA seems to assume that all people using Doncaster railway station who live in the new development will either cycle there or use the bus. It is more likely that the majority of people using the train station will drive there, given the distance involved and the convenience of using a car rather than public transport.
- The parking provision set out in section 3.5 makes it clear that a high number of vehicles are expected to be owned by new residents in the development. Each 2-bed unit has 1.5 spaces allocated, and each 3-bed and over unit has 2 spaces, plus a further 1 space for visitors for every 4 houses. There are also garages for many of the developments in which additional vehicles will be kept. Accordingly for 121 houses, this means a significant number of vehicles (250+ at least), a significant proportion of which are likely to be using the estate roads at peak times for getting to work, dropping children at school, etc. The number of vehicles for which parking is being provided makes it clear that the expectation is that vehicle usage will be high, with little sustainable transport being used.
- Paragraph 5.1.5 states that “*all [existing] dwellings are provided with ample off street car parking*”. This comment fails to recognise the reality that cars and vans are commonly parked on Rose Hill Rise and the Avenue, effectively blocking one side of the estate roads. It is common for vehicles to have to manoeuvre around vehicles to drive through the existing estate.
- The proposed “multi modal trip generator” tables at Tables 5.6 and 5.7 include trips by train and tram, and bus. There are no train or bus services which can access the existing estate or the new development.
- The traffic flow analysis at Section 6 states that the weekday peak in the afternoon is 16:30 to 17:30. This fails to take into account the additional peak earlier in the afternoon caused by trips to Hall Cross School, and other schools in the wider area.
- The base traffic flow analysis has included two developments at Lakeside. It however fails to include the additional traffic flows that will be generated from on-going or further developments in Bessacarr and Cantley which will add significant amounts of traffic to Bawtry Road and/or Cantley Lane. The site at Warning Tongue Lane (MUA50) will contain 275 houses and the site at Manor Farm (MUA08) in Bessacarr is stated in the Local Plan to have 965 houses not yet built. The majority of vehicles from developments on these sites will use Bawtry Road and/or Cantley

Lane and yet no account seems to have been taken of the significant traffic movements which will arise from them.

- Paragraph 7.17 states that there are predicted to be 62 vehicle departures in the morning peak arising from the new development. These vehicles have, it appears, been modelled to leave at one minute intervals, and according to the TA, will not add to the queues from existing vehicles using the estate. As noted earlier, the Local Plan states *“the concentration of outbound traffic at peak times is likely to result in excessive queuing on Rose Hill and potential unacceptable queuing and delays for motorists.”* No explanation has been provided in the TA as to why the assessment in the Local Plan is incorrect.
- Paragraph 7.18 states that there is “excellent visibility” at the junction between Rose Hill Rise and Bawtry Road. There is in fact a wall and a fence to the right of the junction which blocks visibility, and a cycle lane from which commonly cyclists ride straight across the junction without being able to see traffic approaching on Rose Hill Rise.
- The conclusions in section 7.3 are unclear. The initial paragraphs suggest the roads will be over-capacity but then it is concluded that there will be no significant harm to the road network.

## Conclusions

A visit to the Rose Hill estate will show the significant traffic constraints and the issues that will be caused by the proposed development, both in terms of the on-going traffic and loss of amenity to existing residents, and the significant and unacceptable disruption, traffic and loss of amenity that will be caused by construction traffic for a period of 10 years.

Accordingly, the proposal should be rejected on the basis of the transport issues that will arise from the development.

## Access to facilities

The Planning Report contains statements regarding the site being *“highly accessible by all modes of transport”* and that there are facilities *“within a reasonable walking distance to the Site”*.

It is clear however that the vast majority of people on the new development will use their cars to drive children to school and to go shopping (as well as, of course, for going to work). To imply, for example, that people will walk or cycle to the Asda superstore on the other side of Bawtry Road (which is around 0.7 miles/ 1.1 km walking distance from the nearest entrance to the site according to Google Maps) by the Dome to do their weekly shopping is tendentious. Some further observations are as follows:

- It is stated that bus stops are situated 0.5km from the centre of the site. According to Google Maps, the Avenue entrance to the site is 0.3 miles/ 0.5 km and the Rose Hill Rise entrance is 0.4 miles/ 0.65 km from the nearest bus stops, so the centre of the site is further than 0.5km away. Notwithstanding the precise distance, it nevertheless seems unlikely that a significant number of new residents will walk to this bus stop to go to work (assuming of course they work in the centre of town) or to go shopping. The bus stops on Bawtry Road are infrequently used at present (except by school children at peak times) and to suggest that residents of the new development (which is even further away from the bus stop than existing houses) will use the bus services in great numbers does not appear to be a credible assumption.
- Given the site’s location and the estate roads, it is not feasible for bus routes to run to the new estate. As noted above, it is likely that the majority of people will use cars to access facilities,

something that is recognised by developers given the high number of parking spaces and garages being provided as part of the development.

- It is also likely that the majority of children on the new estate will likely be driven to whatever schools they attend rather than either walking or catching the bus.
- The nearest doctor's surgery is (according to Google Maps) around 1.8 miles from the nearest new house on the development. No account is taken of the availability of spaces at surgeries to accommodate the influx of people caused by this development.
- We further understand that the nearest schools to the development are at or near capacity and will have insufficient spaces to accommodate children from the development.

It seems therefore that the majority of any access to facilities (and indeed workplaces) will be by motor vehicle and not by any "sustainable" mode of transport. The development will therefore increase road traffic when Council policies are aimed at shifting people away from car use.

Policy 13 (Promoting Sustainable Transport in New Developments) states that "*new development shall make appropriate provision for access by sustainable modes of transport to protect the highway network from residual vehicle impact.*" The location of the development (at least 0.5km from the nearest bus stop) and its characteristics (i.e. it will not be possible for a bus route to run to the estate) means that for all practical purposes, there is no provision for access by "sustainable modes of transport". In fact, the location and characteristics of the site (such as the large number of car parking spaces being provided) mean it is to all intents and purposes designed to increase car usage.

The proposed development should therefore be rejected.

## Utilities

As noted earlier, the site is bordered on 3 sides by the racecourse, a Local Wildlife Site and a railway line. The only practical access route for utilities infrastructure is therefore through the existing estate. There are likely to be significant problems with this:

- Water: The sewage system for the existing estate has no capacity (as stated by Yorkshire Water in its report: "*capacity is at maximum for public sewer*") and several residents have reported problems with sewage leaking from drains due to the system being unable to deal with existing usage. It is therefore unfeasible to add a further 121 homes to this system and expect it to be able to cope. Given that there does not appear to be an adequate means of foul sewage disposal and treatment, or that capacity can be made available to serve the development, the proposal is contrary to Policy 56 (Drainage) of the Local Plan.
- Electricity: I understand that the current sub-station for Rose Hill may not be able to cope with extra capacity and if so, a new one will be needed. If this is the case, this will result in considerable work and disruption (assuming any issues can be dealt with).
- Gas – as with electricity, further capacity and works will likely be needed.

The proposed development does not therefore appear practicable given the issues with utilities, particularly in relation to water and sewage.

## Pollution to Surface Water Bodies

The Sustainability Appraisal prepared during the preparation of the Local Plan noted Rose Hill was "*located within 10m of a surface water body so potential for significant negative effects against this Objective (14Bii) unless good practice construction techniques are employed to mitigate this, such as collection of site wastewater and appropriate choice for storage of construction materials/chemicals*

*etc. on site for example."* It is unclear from the documents submitted so far how these issues are to be dealt with.

## Archaeology

It is recognised that Rose Hill has a high potential for the survival of significant archaeological remains associated with Roman period pottery production and associated settlement, agriculture and pottery production. Following the archaeological surveys performed, the archaeological report stated that *"further work on the site has a high potential to add to our knowledge of Roman pottery production in South Yorkshire and add to the growing picture of rural settlement across the region"* whilst the Planning Report states that *"the site has high potential for buried archaeological remains"*.

This proposal will clearly have a significant impact upon archaeological remains in an important area for Roman pottery production in Doncaster. No explanation has been provided as to how this development is in accordance with Policy 35 (Development Affecting Archaeology) and specifically no demonstration has been provided to show how *"any benefits will outweigh harm to the site"*.

Further no attempt seems to have been made to comply with the requirement of Policy 35 that *"developments should be located or designed to avoid archaeological remains, to ensure that these remains are preserved in situ"*. The proposed development more or less covers the entire site without attempting to avoid any important archaeological remains or features (although it is accepted that archaeological surveys have been performed and that some artefacts have been identified and preserved, although not in situ).

The proposal is therefore contrary to Policy 35 and should be rejected.

## Climate Commission Report

The proposal is contrary to the aims, objectives and recommendations set out in the Council's Climate Commission Report which contains the following statements:

*"Protecting and restoring nature in gardens, parks, towns and urban areas as well as countryside woodland, wilder areas and peatland"*. This proposed development does not protect or restore nature (rather it does the opposite).

*"This emergency is about carbon emissions, but it is also about biodiversity and our ecosystem. We need to protect and enhance nature for future generations"*. The proposed development does not protect and enhance nature for future generations and results in a decrease in biodiversity and damage to the local ecosystem.

*"There will be a greater proportion of the borough's land given over to woodland, wood pasture and wildflower grassland, supporting greater biodiversity and connecting important wildlife sites together."* This proposal reduces the proportion of the borough's land given over to woodland and wildflower grassland. It also results in less biodiversity and damage/deterioration of connections between wildlife sites (as the development is being built on an existing wildlife corridor).

*"Town centres and urban areas will benefit from more street trees, shrubs, bushes, borders and green spaces"*. This proposal results in a loss of green space in an urban area.

*"Wilder areas of public open space .... should be promoted for the biodiversity of wild flowers, grasses, insects, pollinators, soil health and for public enjoyment"*. This proposal results in the destruction of a re-wilded/ naturalised area of public open space which supports a biodiverse range of wildflowers, grasses, insects and pollinators. This proposal does not therefore "promote" any of

these things, but rather results in the destruction of the type of area the Council says it wants to protect and promote.

*“Species-rich grasslands and other wild areas – one estimation is that each hectare of grassland can lock away 1 tonne of carbon a year, though this can vary considerably depending on the nature and quality of the habitat”.* Rose Hill covers an area of 6.79 hectares and consists of species-rich grassland, scrubland and trees. Each hectare is therefore likely to be “locking away” over 1 tonne of carbon per annum. It therefore has value in tackling climate change and is exactly the place the Climate Commission says should be preserved and protected.

## Doncaster Delivering Together

Number 1 of the “8 Great Priorities” in the Doncaster Delivering Together initiative is “Tackling Climate Change”. The actions set out under this priority include the following:

- *“Deliver the Environmental and Sustainability 2030 Strategy”.* As noted earlier, the proposed development is contrary to many aims, objectives and policies set out in this Strategy.
- *“Devote more land to greenspace and nature”.* The proposal reduces the amount of land devoted to greenspace and nature.
- *“Create ‘Green Hearts’ in our town centres”.* Rose Hill is located in the Main Urban Area of Doncaster and in an area deficient in green space. The proposed development results in the destruction of an existing ‘Green Heart’.
- The video accompanying this priority states *“it’s important for everyone ... to help nature recover”* and states that residents have told the Council that *“climate has to be no.1 priority. Without our natural resources and a viable environment/climate, all else is lost”*, and to *“encourage wildlife to thrive and stop destroying habitats.”* This proposed development will destroy an area where nature has recovered and wildlife is thriving, and will destroy a valuable habitat supporting, for example, red and amber-listed bird species.
- The video also states that the Council will *“create more green spaces”*. How will this be achieved if existing green space is built on?

## Doncaster Central Locality Plan 2022

In May 2022, the Council published locality plans for Doncaster. The introduction to the Central Locality Plan (which covers Bessacarr) states that *“at the core of this approach is the commitment to hear the voices of local people.”* In this regard, the following statements in the plan should be noted:

- Page 5: Residents said *“Green space and protecting wildlife is important to us”* and that the Council should *“improve environment and green space”*.
- Page 9, Bessacarr & Cantley. Bessacarr & Cantley residents specifically told the Council that they should improve environment and green space and *“protect green space from development”*.
- Page 13 states that *“environment and green spaces”* is a priority for the area, and that the Council will *“protect and enhance green space”*, supported by the Environment Strategy under which the Council will *“protect, maintain and enhance our natural areas, and access to and within them.”* It is also stated that under the Local Plan, the Council will *“protect, increase and enhance the local environment.”*

It is clear from the number of objections to this proposal that local people do not want the development at Rose Hill. It is also clear that the residents of Bessacarr and Cantley – and indeed the borough as a whole – want the Council to protect green space and wildlife, and specifically

protect green space from development. Further, the Council has stated that it will do this and that under its Environmental Strategy, it will protect and enhance natural areas.

Accordingly the proposal to develop Rose Hill is contrary to the commitments set out by the Council in its Locality Plan.

## **Statements by Mayor Jones and Ed Miliband MP**

### Mayor Jones

*"I call on all Doncaster residents, businesses and organisations to put the environment at the forefront of their thinking in the way they live their lives and manage their organisations".* (Introduction to Environmental Strategy).

*"If Doncaster is going to make its contribution to this national and international effort, then we need to act now".* (Ibid)

*"We must act now [to tackle climate change] – the planet is telling us to tackle this head on."* (As reported in the Doncaster Free Press, 8 October 2021)

### Ed Miliband MP (Shadow Minister for Climate Change)

*"Planting trees and rewilding will help tackle climate change, promote biodiversity and improve the quality of life in our communities"* (Introduction to Climate Commission Report).

*"This shows why we've got to tackle the climate crisis and the people who say let's not go too far and what's all the fuss about are completely wrong. We've got to tackle the climate crisis .... The climate crisis is now just not a future reality, it is here now and we can't shy away from it."* (Doncaster Free Press, 1 August 2022 commenting on the wildfires that hit Doncaster)

*"... Our biggest enemy is no longer climate denial but climate delay. The most dangerous opponents of change are no longer the shrinking minority who deny the need for action, but the supposed supporters of change who refuse to act at the pace the science demands .... Nothing is more dangerous than the mirage of action shrouding the truth of inaction, because it breeds either false confidence that we will be OK or cynicism and despair about meaningless political promises".* (Article in the Guardian, 30 July 2021)

## **Conclusions**

The application to build 121 houses at Rose Hill is not in accordance with the policies set out in the Doncaster Local Plan or its other associated environmental policies, strategies and initiatives. As shown above, there are material considerations weighted against development at Rose Hill in practically every key aspect of the proposal, but particularly in relation to those policies relating to biodiversity, trees, green spaces and transport issues. These material considerations demonstrate that not only is the proposal contrary to many policies in the Local Plan, but that the harm that this development will cause far outweighs any potential benefits.

**Accordingly this proposal should be rejected.**