Doncaster Local Plan 2015-2035: Examination in Public

Peel L&P / Doncaster Sheffield Airport Limited

Supplementary Questions 10.1-3

13 October 2020
1. Supplementary Questions 10.1-3

SQ10.1. Is aviation growth, additional road links and provision of car parking to meet demand consistent with current national, sub regional and local policies relating to climate change?

1.1 The growth and expansion of DSA is consistent with current national, sub-regional and local policies relating to climate change. The Inspector is invited to consider the following points:

- It is important to note that the airport operates within an existing and extant planning permission which was granted in 1999\(^1\). The planning permission facilitates the “redevelopment of Finningley Airfield for the purposes of a commercial airport with airport related business, leisure and hotel activities.” Amongst other matters, planning condition no.5 attached to the permission limits the overall number of aircraft movements\(^2\) and within that overall number, certain categories of movements. The proposed policy 7 does not seek to address or alter the number of consented aircraft movements allowed at DSA. The growth in passenger and cargo throughput by 2037 which is forecast under the airport masterplan (core growth scenario) can be accommodated within both the terms of the existing consent and runway infrastructure capacity.

- Our previous submissions\(^3\) have set out that national policy sets a priority of making better use of runways at UK airports and supports the continued growth of UK airports outside the South East to, inter alia, ensure a balanced economy and to reduce the need for air passengers and freight to travel long distances to reach larger UK airports. In March 2020, the Government\(^4\) reaffirmed, in the light of its commitments to address the issue of climate change, that airport expansion is still a core part of boosting the nation’s global connectivity and levelling up across the UK.

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\(^1\) Planning Permission Ref: 01/1000266

\(^2\) The permission sets out an overall limit of aircraft movements of 59,026 per annum of which 27,799 per annum are passenger movements and 4,140 per annum are cargo movements

\(^3\) See Matter Statement 10: DSA

National and local policy relating to climate change continues to evolve on this matter, in response to the UK’s commitments as set out in the Paris Agreement and the Climate Change Act. In aviation terms, the policy framework also continues to evolve. The Government set out its initial thinking in the Aviation Strategy\(^5\) and Decarbonising Transport (2020) which are precursors to the development of a net zero aviation strategy, expected in Autumn 2020, which will propose how the Government plan for aviation to play its part in delivering the UK’s net zero ambitions. Accordingly, the national policy which will provide the pathway for aviation to meet the Government’s targets on climate change has yet to be publicised. Such policy and the changes to the aviation industry which may be required is absent and currently outside the scope of the Local Plan because it must be addressed by Government at the national and international industry level, as the CCC have previously advised. When developed, it will be for the aviation sector and individual airports to react to and conform to what is proposed.

There is, however, already a sector wide commitment to achieving net zero emissions. UK aviation has committed to achieving net-zero emissions by 2050, through an international approach, working with governments around the world. A decarbonisation roadmap\(^6\) has been produced which shows how the industry can accommodate a 70% growth in passengers by 2050 whilst reducing net carbon emissions levels from just over 30 million tonnes of CO\(_2\) per year down to zero through smarter flight operations, new aircraft and engine technology, modernising our airspace, the use of sustainable aviation fuels and significant investment in carbon reductions through smart market-based policy measures.

In 2016, the International Civil Aviation Organization (ICAO) adopted CORSIA to address rising carbon emissions from civil aviation, with the aim of limiting net carbon emissions from international aviation to 2020 levels. It is important to note that DSA has no direct control over aircraft emissions and it is anticipated that a significant proportion of international aviation emissions from DSA will be offset by airlines as part of their obligations under CORSIA. However, since CORSIA


applies only to international flights and a small number of destinations are exempt, for example flights to small island states and some of the world’s least developed countries, there is a small gap in emissions not covered by CORSIA which will need to be addressed.

- Notwithstanding its inability to control or influence aircraft emissions, there is a strong commitment from DSA to play its part towards the UK’s net zero target as required by regional policy and emerging local policies. It welcomes the report by the Doncaster Climate Change and Biodiversity Commission which, amongst other areas, highlights the significant role that the airport should play in helping to tackle the climate change emergency. DSA is committed to reducing GHG emissions associated with its four key activities (construction, airport operations, surface access journeys and air traffic movements) and is commissioning a full sustainability review and will publish a new sustainability statement in due course. DSA is progressing a number of GHG emissions reduction measures which will include a solar farm to the northern end of the airfield; promoting a new rail connection and; and securing growth with airline operators such as Wizz Air, Europe’s greenest airline, who have the lowest carbon footprint per passenger with 56.5g CO₂ per passenger/km.

- As is set out in our previous submissions, existing evidence demonstrates substantial levels of leakage of air passengers from SCR to other distant UK airports, resulting in c80 million net additional road miles every year. Increasing the number and frequency of routes and destinations from DSA would encourage a greater number of passengers living within SCR and the wider DSA catchment to fly from DSA rather than continuing to travel to airports further afield. There is therefore a strong likelihood of a reduction in surface miles travelled, entirely

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7 See Appendix D Aviation, Doncaster Climate Change Commission, Final Report To Team Doncaster, September 2020
9 Yorkshire and the Humber is one of the most under-served UK regions in terms of departing aircraft seats, at only 1.2 seats per head of population annually. This compares to a figure in the North West of 5.29 and a UK average of 5.18 (Source: IATA PaxIS, 2018); In terms of the catchment population within 60 minutes drive of regional airports, DSA ranks fifth outside London with 5.3million people; that is a larger catchment population than Bristol Airport which carries 9million passengers per year and Edinburgh Airport which carries over 14million passengers per year (Source: CACI, 2017); and Doncaster and SCR currently suffer high levels of ‘leakage’ of air passenger journeys to more distant airports. In 2017, residents of SCR made 3.58million air passenger journeys. Of these, only 0.25million/7% flew via DSA, whilst 2.3million/64% (over 6,300 every day) flew from airports in London, Birmingham and the North West (eg Heathrow, Gatwick and Manchester airports). (Source: CAA, 2018)
consistent with national aviation policy. This has the potential to reduce carbon emissions.

**SQ10.2a. (i) How many square metres of different types of main town centre use floorspace is expected to be built on the 10 hectare site 940 E1?**

1.2 A schedule of floorspace proposed at the Plaza is provided below:

<table>
<thead>
<tr>
<th>Land Use</th>
<th>Maximum Floorspace</th>
<th>Development Cell</th>
</tr>
</thead>
<tbody>
<tr>
<td>E(a) / SG (retail / petrol filling station);</td>
<td>473 sqm</td>
<td>A</td>
</tr>
<tr>
<td>E(b) / SG(r) (restaurant / café / hot food takeaway)</td>
<td>919 sqm</td>
<td>A, B</td>
</tr>
<tr>
<td>E(b) / SG(e) (f) (public house)</td>
<td>314 sqm</td>
<td>C</td>
</tr>
<tr>
<td>C1 (up to 3 hotels);</td>
<td>8,826 sqm</td>
<td>D, H</td>
</tr>
<tr>
<td>E(a) (food-retail)</td>
<td>1,700 sqm</td>
<td>E</td>
</tr>
<tr>
<td>E(a)/E(c)/E(b)/ SG (p) or (q) /SG (r)/ E(e) or E(f) / SG - (retail / financial and professional services / restaurant / café / drinking establishment / hot food takeaway and community facilities such as medical facilities or c crèche)</td>
<td>2,833 sqm</td>
<td>F</td>
</tr>
<tr>
<td>E(g) (offices)</td>
<td>13,572 sqm</td>
<td>G</td>
</tr>
<tr>
<td>E(a) / SG (r) (retail / restaurant / café / hot food takeaway);</td>
<td>3,529 sqm</td>
<td>G</td>
</tr>
<tr>
<td>C3 (dwellings)</td>
<td>12,143 sqm</td>
<td>F</td>
</tr>
<tr>
<td>TOTAL FLOORSPACE</td>
<td>42,689</td>
<td>-</td>
</tr>
</tbody>
</table>

**(ii) How do those amounts of floorspace compare in scale to that in the town, district and local centres identified in policy 2 table 2?**

1.3 Peel L&P and DSA consider that the Plaza would be a small town centre in terms of scale, with a floorspace (discounting residential element and upper floor office) slightly smaller than Thorne.

**(iii) Is that amount of main town centre use development needed to serve an additional 1,200 homes, or fill a current gap in provision?**

1.4 The Plaza proposals are driven by three considerations:
(1) *It is intended to meet the needs of existing nearby residents and businesses.*

There has been significant development within the DSA Masterplan area in recent years (including 550 new homes, over 450,000sqft of commercial space and other related uses such as school and day nursery provision). During this time existing settlements and villages such as Auckley and Finningley have also continued to grow with the introduction of additional housing without any appreciable increase in retail, food and drink and other supporting uses. There are over 8,000 residents within the settlements of Auckley, Finningley, Branton, Blaxton and Hayfield Green\(^\text{10}\) served by only a small number of very small scale convenience stores (such as Auckley Co-op on Hayfield Lane) which provide a predominantly ‘top-up’ shopping function, together with a few take-aways and public houses. To access main foodstores, residents must travel north of the M18 to stores in the main Doncaster urban area, resulting in highly unsustainable shopping patterns and much longer travel distances. As such, early delivery of a significant element of the Plaza would assist in meeting existing demand and create significantly more sustainable patterns of development.

(2) *It is intended to meet the existing needs of DSA passengers and staff*

There is a clear lack of sufficient landside facilities to meet the needs of existing workers and passengers. This places DSA at a competitive disadvantage to other regional airports which have expanding land-side offers which includes multiple hotel options, office space, retail and food provision, and other associated uses.

(3) *It is intended to meet the needs of future residents, workers and passengers arising from planned further growth and development at DSA and within the Masterplan area.*

The DSA Masterplan proposes a significant quantum of new development. Failure to provide sufficient facilities of the correct quantum, quality and blend will likely undermine the sustainability of future growth. Indeed, the lack of sufficient provision would likely hinder the ability to deliver a sustainable

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\(^{10}\) See SDEB2.1-2 Doncaster Settlement Study
community, attract new businesses and fulfil the objectives of the Strategic Economic Plan, Core Strategy and emerging Local Plan.

1.5 A Town Centre Impact Assessment has been prepared for the forthcoming planning application. This shows the Plaza can sustainably meet an existing gap in provision while accommodating future growth (directly at DSA and on adjoining land), and would not significantly affect other centres.

(iv) Is the intention for the area to eventually become a town centre?

1.6 The Plaza would be of a scale, size and function which would define it as a town centre and the Local Plan should define it as such.

(v) If so, would the draft layout attached to Turley’s statement achieve that?

1.7 The intention is to create a location which has a strong sense of “place” and which fulfils the dual function of providing every-day facilities for both the nearby existing, emerging and planned residential and business communities and DSA staff and passengers.

1.8 The parameters of the proposed development have been carefully set to ensure that the centre has a clear character and sense of place with through a defined “high street” with active frontages and streets and spaces which benefit from natural surveillance and alongside a significant green space.

(vi) If the proposal is justified, should the Plan be modified so that it is linked in some way to employment growth at the airport and associated housing development in order to achieve sustainable development?

1.9 No. It would be inappropriate for the Plaza proposals to be linked to employment and housing growth. It is important to note that employment growth is derived from the entirety of the Airport Policy Area, including the Plaza. A mechanism which effectively removes employment growth arising from the Plaza would have knock on effects for successful operation of the proposed housing release mechanism.

1.10 A further mechanism introduced into Policy 7 would complicate the policy and undermine its effectiveness. The plaza is made up of a number of different proposals, and defining which of these are released and under what conditions would prove a difficult task to calculate a justified release mechanism for.
SQ10.3. Is the aim in policy 7 part I for additional car parking to be provided to “meet demand” consistent with national policy? The Council’s statement refers to the Aviation Policy Framework 2013 (OTH52) expecting a reducing ratio of car parking spaces to passengers to reflect increase in sustainable modes. Should policy 7 be modified to incorporate a mechanism to achieve that, rather than meet demand?

1.11 As articulated in our Matter 10 Statement, the provision of additional car parking will be required as the airport’s passenger throughput increases however, this new supply will be based on a reducing ratio of car parking spaces to passengers, to reflect the expected increase in travel to the airport by sustainable modes. Challenging targets for future year sustainable travel, and the mechanisms that seek to achieve these, are set out in the ASAS which is due to be updated in consultation with the Council and other stakeholders to reflect the updated airport masterplan. This form of strategy and arrangement is common practice at all airports.