1. **Question 10.1**

1.1 In our original representation we argued that DSA’s plans for growth and investment must be made within the context of a carbon reduction pathway to Net Zero Greenhouse gases by 2050. The draft masterplan’s aims for increases in passenger numbers appeared unrealistic based on historical data and on the Committee on Climate Change’s advice to Government to include international aviation in UK carbon budgets. Surface transport creates the majority of transport’s carbon emissions and therefore DSA requires a robust surface access strategy for the airport. Even with a shift to electric vehicles a 20-60% reduction in car mileage is required which will depend on demand management of road capacity and modal shift to sustainable modes. In order to ensure development is sustainable we suggested the application of the Institute of Mechanical Engineers’ Transport Hierarchy and the Transport for New Homes checklist, and supported a new rail station on the Lincoln line.

1.2 In addition to our comments on Matter 3 paras 3.3.1-3.3.3 - At present the future of aviation is uncertain. The Aviation Policy Framework 2013 was ambivalent about aviation expansion but required the aviation sector to make a significant and cost-effective contribution towards reducing global emissions (para 12).

1.3 In the more recent Airports NPS 2018 para 1.39 the Government ‘confirmed that it is supportive of airports beyond Heathrow making best use of their existing runways. However, we recognise that the development of airports can have positive and negative impacts, including on noise levels. We consider that any proposals should be judged on their individual merits by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts.’

1.4 In para 2.18 ‘the Government also acknowledges the local and national environmental impacts of airports and aviation, for example noise and emissions, and believes that capacity expansion should take place in a way that satisfactorily mitigates these impacts wherever possible. Expansion must be deliverable within national targets on greenhouse gas emissions and in accordance with legal obligations on air quality.’

1.5 With respect to the airport the SA of the local plan identified that development and growth of the airport will not be carbon or resource-use neutral and would impact negatively on climate change. It believed this impact would be mitigated in accordance with the broader sustainable design and construction requirements of the local plan. We find no evidence of this. Topic Paper 1 Climate change makes no reference to the airport or its negative impacts. The overall spatial strategy is not founded in reducing carbon emissions through land use.
and access. Policy 43 (Urban design) refers to reduction of carbon emissions during construction and operation but not through the layout or planning of individual developments. Policy 14 which is concerned with layout does not refer to it. Para 12.33 refers to:

‘Attempts to secure or exceed an equal equivalent reduction in carbon dioxide emissions (over the current Building Regulations Target Emission Rates) through other measures should be made’ but does not mandate such an excedance in Policy 47. The Local Plan paras 5.21-5.24 regarding design at the airport have not used it to reduce carbon emissions. All these omissions and the approach towards airport growth are inconsistent with NPPF para 148 which requires ‘the planning system to shape places in ways that contribute to radical reductions in greenhouse gas emissions minimise vulnerability and improve resilience’ (our emphasis).

1.6 Transport for the North’s 2017 International Connectivity Commission Report promotes aviation to levels that exceed DfT passenger forecasts, which themselves result in an increase in carbon emissions. Hence the proposed growth in TfN’s report is incompatible with the Climate Change Act and UK carbon budgets.

1.7 We conclude that the proposed expansion of the airport is compatible with the UK’s Net Zero carbon commitments, air quality requirements or noise levels and therefore consider the proposals for development and expansion are not justified or consistent with national policy.

2. **Question 10.2: Mixed-use Urban Extension**

2.1 CPRE has objected to the site allocations E2 and E3 on the grounds that they would create an urban extension which is incompatible with the settlement hierarchy and further increases the dispersed, car-dependent pattern of development in the Borough.

2.2 We note in the pre-amble to the Inspector’s question that “nearly 11,000 jobs would have to be created at or clearly related to the airport for all of the 1,200 homes to be permitted.” This does rather expose an obvious flaw in the allocation of housing here, that it would only play a very marginal role in enabling co-location of homes and employment.

2.3 We would also ask, once these sites are allocated, what policies in the Plan can genuinely enable the Council to refuse a residential application if the envisaged jobs have not materialised?
2.4 In seeking an answer to this question, we refer the Inspector to Doncaster planning application 12/02925/REMM: 352 dwellings, being matters reserved in outline application granted under ref 09/02048/OUTM, at land off Hurst lane adjoining Airport, Hayfield Lane. The outline application claimed the housing was needed to supply homes for those finding jobs in the new, airport-related development. Accordingly, when the outline application was granted, a key feature of the S106 agreement strictly linked completion of dwellings to the phased delivery of a retail and business park in the vicinity. Yet, at the reserved matters stage, the applicant argued the business space could not currently be delivered due to low demand for business floorspace, and that application was granted in contradiction of the S106 on the outline approval.

2.5 In short, the Plan gives no confidence that sites E2 and E3 will be developed as claimed, and the allocations will be easily manipulated by applicants to produce primarily residential schemes that are neither tied to, nor relevant to, job creation in the area. Since DMBC already contends that the sites are not needed to meet the housing requirement, they should not be allocated.

3. **Question 10.3**

3.1 In our original representation we set out how the surface access strategy was inadequate to address the carbon emissions from surface transport. We promoted modal shift based on application of the transport hierarchy that mirrors the carbon footprint of the different modes of travel – active travel first, followed by public transport with car travel last – and demand management of road space.

3.2 The approach in Policy 7 is neither justified nor effective. The provision of additional car parking as public transport use increases is antithetical. Making private vehicle use more expensive or inconvenient is essential to driving a modal shift. Demand management of car parking space is an effective tool to limit car use and increase use of public transport as Nottingham’s workplace parking levy has shown. The policy should limit car parking as the public transport offer improves (waiting for increased use will not work) and prioritise the movement of people, rather than cars, using sustainable transport modes in order to reduce carbon emissions. By contrast the presumption against car parking outside the airport policy area would help to limit car use.

4. **Question 10.4**

4.1 This is unjustified as it would create additional road capacity that would generate more traffic and increase carbon emissions, as shown by our submitted summary of CPRE research ‘End of the road?’. New access over and above the new airport link road, The Great
Yorkshire Way, which opened in early 2016 and gave the airport access to the M18 is not required. National policy for airports and surface access is behind the curve on climate change policy. All the relevant documents regarding surface access were published before the UK committed in 2019 to net zero greenhouse gas emissions by 2050. However, the Government’s approach to surface access in the Airport NPS para 5.5, which is to ensure that access to the airport is delivered in a way that minimises congestion and environmental impacts, supports our view. Policy 7 J2 is also inconsistent with NPPF para 148 which requires ‘the planning system to shape places in ways that contribute to radical reductions in greenhouse gas emissions minimise vulnerability and improve resilience’ (our emphasis).

5. **Question 10.5**

5.1 A new rail station on the Lincoln line is currently unjustified, as is recognised by DMBC’s Infrastructure Strategy Appendix 1 Delivery Schedule. ‘Delivery dates will depend on passenger growth. A minimum of 5 million passengers per annum are required to deliver commercial viability of an airport rail service,’ a level DSA falls well short of. However, it would however offer a cost effective opportunity for modal shift and could become commercially viable as development of the airport policy area progresses.

5.2 A new ECML connection and railway station at the airport is also unjustified. Investment in major rail infrastructure has to be proportional to potential demand. At present the future of aviation is uncertain and planning for an expansion of DSA to a size where it would support a link to the ECML is unsustainable. Plans for development of the link are in the early stages and scheme delivery would be beyond the timescale of the Local Plan. The route would also cut through the employment allocations and, despite DMBC’s claim that the Local Plan has inbuilt flexibility e.g. to accommodate the outcomes of the Covid pandemic, such infrastructure would have a substantial impact on these allocated sites. There is also a danger that the station would become a parkway station, attracting car journeys for drivers avoiding the centre of Doncaster and having no business within the airport policy area, unless it had extremely restrictive car parking.

5.3 However, both the station on the Lincoln line and the link to the ECML would meet with the Airports NPS para 5.5 which seeks access to the airport by road, rail and public transport that is high quality, efficient and reliable for passengers, freight operators and airport workers who use transport on a daily basis, and that maximises the number of journeys made to airports by sustainable modes. They would also meet with the National Policy Statement for National Networks para 2.8 requirement for improved integration between the transport modes to airports.