Examination of the Doncaster Local Plan
Council Hearing Statement

Matter 10. Doncaster Sheffield Airport

September 2020
Airport, aviation related, and employment developments

Q10.1. Is the support in policy 7 for growth and investment at Doncaster Sheffield Airport to enable its development and expansion justified and consistent with national policy (subject to the Council’s suggested changes to clarify the geographic areas that the various parts of the policy apply to)? In particular:

a) The broad support for the ambitions set out in the airport’s Growth Plan.

b) The support in part A for aviation uses and infrastructure required for the safe operation and growth of the operational passenger and freight airport uses in the operational area.

c) The support in part B for aviation related development within the airport operational area.

d) The airside employment and operational uses proposed in part C for site 517.

e) The employment uses supported on allocated sites 748 and 941.

f) The support in part E for further employment development in employment policy areas within the airport policy area.

g) The support in part H for aviation heritage and training at land north of Hayfield Lane in the airport operational area as shown as “community facilities: Vulcan hangar and training centre” on the Policies Map.

1. The Council view Doncaster Sheffield Airport (DSA) as a unique economic asset for the Borough and City Region, with the potential to drive jobs growth, diversify the job offer, and help the Borough and City Region deliver an improved and diversified economic offer, significantly boosting the local and regional economy.

2. Its role is not only limited to the airport and surrounding area, but it forms a key part of a wider economic growth corridor, also including the iPort and Rotherham / Sheffield advanced manufacturing centre (close to J33 of the M1). It is part of a wider area where air (DSA), road (M18 and connections to the M1, M62, M180 and A1(M)) and rail freight (iPort) all converge and are further complemented by proximity to the Humber Ports (sea), to offer a unique location for economic growth. Furthermore DSA also provides international connectivity to the Borough and City Region, increasing the international appeal of both allowing direct passenger and freight opportunities for residents and businesses. The airport is acknowledged as an ‘international gateway’ to the Borough and City Region.¹

3. The Sheffield City Region Strategic Economic Plan (SEP) identifies DSA as one of its key spatial and economic priorities,² and the Integrated Infrastructure Plan (IIP) acknowledges the airports important role in providing an international gateway and attracting aero related employment and training acting as a catalyst for business development, inward investment and job creation with regard to logistics, engineering and associated aviation

¹ AE17 - Sheffield City Region, Strategic Economic Plan 2015 – 2025, pp. 16; 49; AE18.1 - Sheffield City Region, Integrated Infrastructure Plan, 2015, pp. 4; 29
² AE17 - Sheffield City Region, Strategic Economic Plan 2015 – 2025, pp. 31
activities. The SEP is currently being updated and is out to consultation, and this is proposed to be supplemented by a specific ‘economic blueprint’ for DSA which will set out how various parties will work together to realise the economic potential of the airport, reaffirming the importance of DSA to the City Region.

4. The Council’s Inclusive Growth Strategy cites supporting Airport Growth as one of the borough’s ‘Game-changing actions’ where the Council will continue to support airport growth, including expanding the enterprise sector, linking to regional growth corridors (such as the aforementioned Advanced Manufacturing Park in Rotherham), and securing support for a rail link between the airport and East Coast Main Line.

5. In short, both the Council and City Region believe that the airport is an important component in the economic growth in the area, and the Council through Policy 7 are encouraging and supporting the growth of the airport and helping to further unlock its associated economic potential.

6. The airport have developed a draft airport masterplan (DSAM), which sets out their vision for the growth and expansion of the airport and land surrounding this site.

7. The support in Policy 7 for the growth and investment at Doncaster Sheffield Airport is in line with NPPF paragraph 104(e) and footnote 42, and the overarching aims and themes of the Aviation Policy Framework (APF).

8. The support in Policy 7 for the growth of DSA is also consistent with the Airports National Policy Statement, which acknowledges the importance of aviation to the UK economy and the National Infrastructure Delivery Plan, which notes “Smaller airports are vital for local economies, opening up opportunities and connecting the UK.”

9. Specifically:

| a) The broad support for the ambitions set out in the airport’s Growth Plan. |

10. The airport operator has completed and consulted on the DSAM as recommended in the APF. The “broad” support for the ambitions set out in this document reflect that the Council is generally supportive of the continued growth and development of the airport and land within the wider Airport Policy Area (as established in and subject to the Council’s suggested activities).
modifications), and the investment and employment opportunities that this can bring, but believes that this must be done in a balanced, sustainable and holistic manner which satisfies various planning requirements and the Borough Council – and reflects the balance that the APF strives to achieve for UK airport growth. This is what Policy 7 aims to achieve.

11. In line with NPPF paragraph 104(e), Policy 7 recognises the contribution the airport makes to the local and regional economy and provides a framework to both support the airports existing and continued operation. It allows for the expansion of the airport and employment opportunities within the wider airport policy area to support its growing economic role in Doncaster.

12. The DSAM is an independently prepared document which reflects the vision and wishes of the airport operator and reflects the requirement of masterplans as set out in the APF.

13. The Council do not believe the role of the Local Plan is to support the contents of the DSAM indiscriminately or verbatim, rather the Council has taken stock of the contents and considered what the Local Authority and Local Plan can support and in what ways. There is “broad support” for the ambitions of the DSAM and the Local Plan generally reflects this through Policy 7, however there are some notable differences:

- Differences in proposed land uses – particularly to the north and west of the airport policy area which the Council has elected to leave as Countryside, whereas the DSAM allocates land for housing;

- The Local Plan supports the aims of a mixed use site through the allocation of sites 940 E1, E2 and E3 in addition to the allocation of existing employment permissions (748 and 941), however the Council believe this should be subject to caveats and mechanism as set out in Policy 7 to ensure the delivery of jobs and housing rather than simply allocating the housing;

- The requirement in Policy 7 for development to be informed by a masterplanning exercise, which the DSAM does not set out but the Council believe to be essential (please see response to 10.6).

14. The APF demonstrates the governments support for aviation sector and recognises its economic role and importance to the country. The growth of the sector is supported at a national level. The APF supports the growth of airports outside of the South East stating that they “are vital to their local and the national economy, and many are growing and creating jobs”.

---

9 As set out in DMBC8 – Doncaster Council Response to Further Preliminary Questions, 4th June 2020
10 OTH53 - Doncaster Sheffield Airport Masterplan 2018 – 2037, Table 7, pp. 123
11 CS04 - Doncaster Local Plan 2015 – 2035 Regulation 19 Publication Version policies Map
12 OTH52 - Aviation Policy Framework, paragraph 5 and Section 1, pp. 9 & 16 - 39
listing a number of local airports and their wider economic role.\(^{13}\) The importance of aviation to the UK economy is also reiterated in the Airports National Policy Statement.\(^{14}\)

15. However, the APF is also clear on the need for balance – that aviation growth can have social and environmental consequences, and that there must be consideration of the impacts of aviation and not just the economic gains an airport and wider airport related development can bring. This is set out from the outset of the APF, in the foreword and in the first section of the executive summary: “A balanced approach to securing the benefits of aviation”,\(^ {15}\) and follows on throughout in the need to balance the benefits (section 1) and the impacts (climate change, noise, and other environmental – Sections 2 & 3).

16. The Council therefore sees the statement of “broad support” within Policy 7 as consistent with national policy – both in terms of supporting the growth of the airport and related development in Doncaster (as per NPPF 104 (e) and in line with the APF), but doing so in the balanced and considered manner, being the overall approach promoted in the APF – which is reflected in Policy 7.

b) The support in part A for aviation uses and infrastructure required for the safe operation and growth of the operational passenger and freight airport uses in the operational area.

17. Chapter 5 of the Local Plan acknowledges that the primary function of the airport is as a passenger and freight terminal.\(^ {16}\) As such, within the airport operational area (airside, where public access is strictly controlled), certain development is necessary for the Local Plan to support to ensure the growth of the airport in this regard.

18. The airport operational area, as shown on the policies map,\(^ {17}\) represents the proposed expanded operational area, which has yet to be formally designated. The existing operational area excludes land to the south west and south east of the runway, as well as some land to the south of the terminal. The airport operator believes that the airport operational area needs to expand to accommodate the growth of the airport and the Local Plan reflects this proposal.

19. Certain operational development benefits from permitted development rights under the General Permitted Development Order (GPDO) (2015) on operational land in connection with the provision of services and facilities at

---

\(^{13}\) OTH52 - Aviation Policy Framework, pp. 21

\(^{14}\) OTH68 – Airports National Policy Statement, 2018, para 2.1 – 2.9, pp. 13 - 14

\(^{15}\) OTH52 - Aviation Policy Framework pp. 5 & 8

\(^{16}\) CSSD3 - Doncaster Local Plan 2015 – 2035 Regulation 19 Publication Version, para. 5.10, pp. 51

\(^{17}\) CSSD4 - Doncaster Local Plan 2015-2035 Regulation 19 Publication Version Policies Map
airports. These include matters such as terminal expansion (within limits set out), and air traffic services. Policy 7, part A lists the types of developments that are deemed necessary to support the function of the airport and its operation, and thus which are justified as being located within the airport operational boundary. Land not currently within the existing airport operational area does not benefit from permitted development rights, however the Council is supportive of the expansion of the operational area boundary and therefore the uses listed is part A are supported in this location regardless of whether they benefit from permitted development or require planning permission prior to the expanded operational area being designated (or if they exceed limits set out in the GPDO).

20. In the view of the Council, the developments listed in Policy 7 part A are all related to the continued growth of the airport and its passenger and freight operation and necessary to be located airside or within the operational area. Although A6, A7 and A8 (car parking, public transport facilities and airline training facilities) do not strictly have to be located within the operational area of an airport, the Council are supportive of these airport related uses in this location should they come forward, and these reflect uses proposed for this location within the DSAM.

21. As infrastructure developments that support the continued growth of the airport, their inclusion within the policy is consistent with NPPF paragraph 104(e). Such development allows the airport to grow its passenger and freight function, which in turn is key to the growth, function and success of the wider Airport Policy Area, which centres around the airport itself. This aligns with the aims of the APF to develop and grow airports outside of the south east and take pressure off London’s airports, manage capacity challenges at other airports and help rebalance the economy. This also increases the opportunities for, and chances of, better connectivity by improving the airports function – which the APF states is key to the continued economic success of the country.

22. Part B is designed to cover aviation related uses not specifically listed in Part A, but still proven necessary to be needed within the airport operational area (and linked to the role and function of the airport as a passenger and freight terminal). As per the answer to question 10.1b, the Council views the support for aviation related development within the airport operational area as consistent with the aims of the APF and NPPF para. 104(e) in providing for the growth and expansion of the airport function and providing flexibility to

c) The support in part B for aviation related development within the airport operational area.

---

18 OTH66 – General Permitted Development Order (2015), Schedule 2, Part 8, Class F - M
19 OTH52 - Aviation Policy Framework, paras 1.20 – 1.24; 1.109, pp. 20 – 22 & pp. 39
20 Ibid. para. 1.46, pp. 28
allow for the infrastructure required to allow the airport to grow in its operation, for the reasons stated in the answer to question 10.1b.

d) The airside employment and operational uses proposed in part C for site 517.

23. Part C formally allocates land within the proposed operational area for airside operational and employment uses. The aim of this is to specifically earmark this land (site 517) for the stated purposes, and differentiate between this area and the wider airfield area also contained within the airport operational area, where more generalised aviation uses and infrastructure development may occur.

24. As per the answer to questions 10.1b and 10.1c, the Council views support for they types listed as consistent with the aims of the APF and NPPF para. 104(e). Specifically, the uses listed include air cargo transit sheds and an MRO campus / advanced manufacturing research centre. Both freight and manufacturing are listed within the APF as aviation related contributors to the UK economy. The proposed uses are necessary to locate here and benefit from, or are necessary to locate in proximity to, the airport / with direct access to the airports “airside” operation. This will contribute to the growth of the airports operation and function, and its wider contribution to the economy.

25. Furthermore, an MRO campus and advanced manufacturing centre will help diversify the job offer in the borough, providing specialised industry, higher skilled jobs and potential links with the University of Sheffield. This is in line with the Borough’s Inclusive Growth Strategy, which includes in its mission amongst its “six drivers of growth” industry specialisms, education & skills, and better work and jobs.

e) The employment uses supported on allocated sites 748 and 941.

26. Site 748 benefits from an outline planning permission, and is allocated as an ‘allocation with planning permission’ in table E7 of the Local Plan.

27. The permission does permit office uses, but is conditioned to limit these to airport related offices and lists what falls into this category on this site. This is to ensure that general office uses are directed to the town centre.

21 OTH52 - Aviation Policy Framework, para. 1.6 – 1.8, pp. 17
22 Ibid. para. 1.9 – 1.11, pp. 17 - 18
23 OTH53 - Doncaster Sheffield Airport Masterplan 2018 – 2037, pp. 22
26 CSD3 - Doncaster Local Plan 2015-2035 Regulation 19 Publication Version, Table E7, pp. 235
27 AE21 - Decision Notice for Planning Application 17-02733-OUTM - Business Park adj. Doncaster Sheffield Airport (Site 748) (2018), Condition 22
However, research and development, industrial processes, general industrial and storage and distribution uses are not restricted to airport related uses in the outline permission and therefore general employment development in line with the aforementioned uses are acceptable on this site.

28. In granting the permission, the case officer acknowledged they could see no reason in national policy that research and development, industrial processes, general industrial and storage and distribution uses on this site had to be tied to airport related uses. Site 748 therefore offers the opportunity for businesses who wish to locate close to the airport and take advantage of this sites close relationship to the airport and its functions, but does not necessarily compel them to be airport related.

29. Site 941 is a site allocation as per Table 4 of the Local Plan,28 which latterly now also benefits from an outline planning permission for research and development of products and processes, industrial processes, general industrial and storage or distribution.29 As with Site 748, there is nothing in the decision notice stating that these must be aviation related developments, but the site provide the opportunity for businesses to situate themselves close to the airport and to take advantage of this location.

30. Although both sites benefit from outline planning permission, they also form key components of the wider concept of the associated mixed use site adjacent to the airport in the DSAM, and within the proposed Airport Policy Area. The APF notes that airports “are in some ways cities themselves”,30 and that “many airports act as focal points for business and employment”,31 citing examples of how airports outside of the South East are growing and creating jobs both directly linked to the airport operation and wider airport areas.32 This shows governmental support for wider economic development around airports. The Airports National Policy Statement also notes that “International connectivity attracts businesses to cluster round airports, and helps to improve the productivity of the wider UK economy”.33 Transport for the Norths Independent International Connectivity Commission Report also recognises the potential of airports to act as economic clusters, noting that “by acting as regional growth magnets, airports can use land around their core facilities to support the attraction of other activities which value proximity to an airport or seek to benefit from the high quality surface access links”.34

28 CSD3 - Doncaster Local Plan 2015-2035 Regulation 19 Publication Version, Table 4, pp. 37
29 AE22 - Decision Notice for Planning Application 18-02759-OUTA - Land To The West Of Doncaster Sheffield Airport (Site 941) (2020)
30 OTH52 - Aviation Policy Framework, para. 1.20, pp. 20
31 Ibid. para. 1.22, pp. 20
32 Ibid. para. 1.22, pp. 20 and the table on pp. 21 – 22
33 OTH68 – Airports National Policy Statement, para 2.2, pp. 13
34 OTH70 – Transport for the North - Independent International Connectivity Report, pp. 20
31. Through the DSAM, DSA is seeking to emulate these models. Support for the employment uses in on sites in 7D means the Local Plan supports economic growth around the airport in addition to the growth of the airport itself. It gives the permitted employment development status’ linked to the airport itself, and focusses economic growth around this key infrastructure asset. The airport acts as an anchor to drive wider economic growth around it.

32. As with answers to 10.1a, b, c and d, the allocated sites are meeting the requirements of NPPF para. 104(e) by supporting wider development required to support the airports contribution to the wider economy, and facilitating potential opportunities for employment development linked to and benefitting from proximity to the airport.

33. Please note that it is proposed that part D will be modified to reflect changes to use classes. Please see the response to Q10.1.A (below) and the Main Modifications.

f) The support in part E for further employment development in employment policy areas within the airport policy area.

34. As per the answer to 10.1(e), supporting the uses specified on employment policy areas which fall within the airport policy area, is part of the notion of a wider concept of a mixed use area adjacent to the airport and reflects how airports can act as an anchor for business and employment, in the ways acknowledged in the APF. This policy supports the co-location of employment uses close to DSA, which can benefit from, or need to be located close to the airport itself.

35. As above, the APF supports the notion of wider airport sites delivering jobs and services in relation to the airport function, and NPPF 104(e) supports wider development to “to support their operation, expansion and contribution to the wider economy”. However, as with the allocations, whilst these uses are desirable, the land is allocated as ‘employment policy area’, and therefore whilst Policy 7 links these areas to the airport and lists desirable uses for this location and for sites proximity to the airport, the employment policy area is also subject to policy requirements set out in Local Plan Policy 5.

g) The support in part H for aviation heritage and training at land north of Hayfield Lane in the airport operational area as shown as “community facilities: Vulcan hangar and training centre” on the Policies Map.

36. This site benefits from a planning permission for an aircraft hanger with ancillary retail, cafe, bar, education, conference, office, kitchen and assembly areas. The hangar will house Vulcan Bomber XH558 which is based at the airport, and function as a tourist attraction and conference centre. The Vulcan

---

35 AE23 - Decision Notice for Planning Application 17-02280-FULM - Vulcan Hangar, Doncaster Sheffield Airport (2017)
requires access to the airfield therefore the hangar needs to be within the airport operational area.

37. This provides a link to the airports former role as an RAF base during the cold war, and is consistent with the aims of Chapter 16 of the NPPF in conserving and enhancing the historic environment and paragraphs 184 and 185 more specifically.

<table>
<thead>
<tr>
<th>Q10.1.A. Does policy 7, or associated reasoned justification, need to be modified to reflect the changes to the Use Classes Order that will come into effect on 1 September 2020?</th>
</tr>
</thead>
</table>

38. Following changes to use classes on 1\textsuperscript{st} September 2020, and in response to Question 10.1.A of INSP6, both Policy 7 and its accompanying text have been amended to remove reference to the former use classes, however the Council expects the sites to deliver the specific uses set out in the permission and has included the development types within the Policy and its accompanying text. Amendments to reflect these changes are set out in the Main Modifications, and shown below:

<table>
<thead>
<tr>
<th>Policy 7: Doncaster Sheffield Airport Policy Area Part D (as amended in the response to further preliminary questions 04/06/2020)</th>
<th>Employment (B1 a–(airport related offices only, research and development of products and processes, industrial processes, general industrial and storage or distribution), b/c, B2 and B8) uses will be supported on allocated site 748 &amp; B1 b/c, B2 and B8, research and development of products and processes, industrial processes, general industrial and storage or distribution on allocated site 941 subject to the requirements of Policy 4.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paragraph 5.32 (as amended in the response to further preliminary questions 04/06/2020)</td>
<td>In the delivery of expanding the airport and nearby residential development at the scale envisaged, the provision of a central plaza to provide new services and community facilities will be supported. This area should accommodate appropriate small scale retail, related services, and community facilities (in the interests of creating a mixed use community) leisure uses (as defined in the Use Classes A1 to A3 and D2) whereby they will be permitted in order to serve the needs primarily of existing and future residents, employees in the area and visitors. Other suitable uses such as hotels (Use Class C1) will help meet the demand for development by the expanding airport. Within any such development there should be opportunities to link the area to the wider network to ensure good public transport links and a safe and secure walking and cycling routes are integrated where</td>
</tr>
</tbody>
</table>
it would not lead to unsustainable trip generation for users and help develop a thriving community.

Q10.2. Is the identification of 105.5 hectares for a housing-led mixed use urban extension on land to the south west of Hayfield Green and the approach to its release set out in policy 7 parts F and G justified and will it be effective in achieving sustainable development? In particular:

a) 10 hectares (site 940 E1) for a central area of retail, food and drink, hotel and other commercial and community uses.

b) 11 hectares (site 940 E2) for up to 280 dwellings to support initial phases of airport expansion and employment growth.

c) An additional area of approximately 70 hectares (site 940 E3) for a reserve site for up to 920 houses conditional strictly tied to the delivery of jobs (on the airport site or elsewhere in the Borough if specifically and clearly related to the airport) as set out in part G and Appendix 3.

d) Should any housing completions on allocated sites 940 E2 and E3 be counted towards achieving the strategic aim of delivering 18,400 new homes in the Plan period?

39. The primary role of the airport is a passenger and freight terminal. The Council is supportive of the growth and development of the airport and recognises the economic importance of the airport and the unique opportunity this asset presents the Borough and City Region. The Local Plan supports the airport and the DSAM through the allocation of employment land and support for the growth of the airport operation itself, as set out in the above response to Q10.1.

40. The DSAM also envisages as part of the overall wider airport concept that a mixed use development will be located on land to the west of DSA, including retail and housing in addition to the aforementioned employment development and the airport itself. This forms part of the DSAMs overall vision that DSA can become a sustainable location for jobs and housing in its own right, with significant job growth in and around DSA to justify the co-location of new housing here.

41. The Local Plan settlement strategy has identified Auckley – Hayfield Green (where the airport is located) as a Service Town and Village, with a level of housing allocated appropriate to its size and service provision, as established through the Settlement Audit and explained in the Housing Topic Paper. Two allocations have been identified to meet this need based on permissions (site 837 had permission as at 2018, site 223 latterly benefits from permission) and therefore no further housing land is required to meet the identified housing need of 125 new dwellings in this location as per the

36 SDEB2.2 - Settlement Audit (2020 Update), pp. 11 & 16
37 DMBC4, Housing Topic Paper, pp. 36 - 41
Settlement Strategy. The service provision in the settlement, as established in the Settlement Audit is suitable to support the allocations proposed (sites 837 and 223).

42. The Council believe that given the importance of DSA to the Borough and City Region economically and strategically; and given it presents a unique opportunity to both; and in the interests of supporting the sustainable growth of the airport and realising the ambitions of the DSAM, that a special case exists to support housing and retail / commercial development on sites 940 E1, E2 and E3.

43. The Council support the principle of housing in this location on sites 940 E2 and 940 E3, however strongly believe that the airport first and foremost has an economic function, and therefore the Council wish to see the delivery of significant jobs growth as outlined in the DSAM before permitting the scale of housing that is conditionally allocated in Policy 7. Therefore, the support for housing is only justifiable if linked to the proven delivery of jobs at the airport.

44. The Council acknowledges that housing:

1 – Provides the opportunity for existing or future employees of the airport or associated employment sites to live close to their work – with increasing importance given the growth in jobs projected at the airport and within the Airport Policy Area, and the lack of alternative local options currently to accommodate this. (The policy mechanism includes a ratio in acknowledgement that not every employee will want or need to live next to the airport);

2 – Can help create an attractive and rounded proposition to potential businesses and their employees looking to locate close to the airport and take advantage of the location – further boosted by links to iPort, the motorway network and the Humber ports;

3 – Provides an opportunity to create sustainable development by co-locating jobs, housing and retail opportunities together – but the mechanism prevents a large housing development coming forward in this location without nearby employment opportunities first to support it;

4 – In combination with improved retail opportunities and new jobs alongside infrastructure improvements including the Great Yorkshire Way and the proposed ECML station at the airport, can form part of a sustainable package of growth;

5 – Provides an incentive to deliver the jobs growth envisaged in the DSAM which is important to the Borough and City Region, as housing development relies on the proven creation of jobs;

38 OTH53 - Doncaster Sheffield Airport Masterplan 2018 – 2037, pp. 89 - 97
6 – Increases the viability of the plaza proposal which will benefit new and existing residents (especially on the adjacent Hurst Lane site (Site 837) and noting that the existing local offer can be improved), local employees and users of DSA; and

7 – Will help provide capital to the airport operator to continue their investment in DSA and support the economic development of the airport and help the airport deliver its wider developmental aims and ambitions.

45. The DSAM envisages that the airport could deliver upwards of 10,000 new jobs. This would be a significant level of new employment for the Borough as well as the City Region. Policy 7 ensures that the delivery of jobs is a primary aim for the airport, but it supports housing linked to the delivery of the jobs the DSAM projects the airport can deliver.

46. Specifically:

| a) 10 hectares (site 940 E1) for a central area of retail, food and drink, hotel and other commercial and community uses. |

47. The intention of the ‘central plaza’ is to provide shops and services to both support the future residents on site 940 E2 and E3, employees of the airport and the surrounding employment areas, and furthermore to provide services which also support the airport function such as a hotel. The housing, employment and airport development envisaged require new services to support them and the central plaza will deliver this. In turn, this will help deliver sustainable development through the co-location of new shops and services with other planned development.

48. The Settlement Audit found that Auckley – Hayfield Green has a level of services and is of a size which would place it in the Service Towns and Villages within the Local Plan, which will provide new housing to meet its assessed local housing needs. Whilst the service provision identified is sufficient for a settlement the size of Auckley – Hayfield Green and the new housing allocated within Policy 16 / Chapter 16 of the Local Plan, it is insufficient in both amount, provision and location to support the potential housing growth envisaged in total on sites 940 E2 and E3 and wider airport growth. The settlement especially lacks a significant retail offer.

49. Therefore, in order to support the scale of potential housing and employment growth at the airport, as well as the general growth of the airport operation, Policy 7 allocates land for a ‘central plaza’ of retail, food and drink, hotel and other commercial and community uses.

---

39 OTH53 - Doncaster Sheffield Airport Masterplan 2018 – 2037, pp. 89 - 97
40 SDEB2.2 - Settlement Audit 2020 update, pp. 11; 16
50. The site will be sustainably located in relation to the newly proposed housing, as well as adjacent to existing recent housing development at Hurst Lane (site 837, to the north of 940 E1). The masterplan exercise set out within Policy 7 will help to ensure good links between the residential areas and the plaza for future residents.

51. This meets with the requirement of NPPF paragraph 72 that when planning for large numbers of new homes, these should be supported by “the necessary infrastructure and facilities”. Given existing service levels in Auckley – Hayfield Green, this is a key component to ensuring that a sustainable community can grow here.

52. Furthermore, the plaza will be used by airport staff and customers, as well as employees on the various employment sites. The plaza therefore also more widely supports the airport and wider non-housing development, again in line with NPPF para. 104(e).

53. Increasing demand from people working and living in the area and using the airport will drive demand for this site and increase its viability. This in turn will create new jobs of different types to those that will come forward on the employment sites.

b) 11 hectares (site 940 E2) for up to 280 dwellings to support initial phases of airport expansion and employment growth.

54. DSA is not waiting on the Local Plan to progress its growth aspirations, and has secured outline permission on sites 748 and 941. Employment provisions which make up the proposed airport policy area (and will count towards the delivery of housing in the mechanism) are therefore advancing.

55. The Council is supportive of the co-location of jobs, housing and retail/commercial elements close to the airport for the reasons stated above, but wants to ensure that job creation is what ultimately drives the demand and justifies the need for housing in this location. If jobs are delivered, then the housing is justified in line with the mechanism set out in Policy 7 and Appendix 3, which will in turn mean that development is more sustainable due to the co-location of jobs and housing. The onus is on the airport operator and landholder to facilitate jobs growth.

56. The 280 houses permitted “up front” in Policy 7 is the only time housing will be permitted before jobs have been delivered. The remaining 920 houses will be subject to the proven delivery of jobs within the airport policy area or clearly related to the airport. Crucially, the initial 280 dwellings are in lieu of jobs, and the jobs which are related to this must be factored in to and

41 AE21 - Decision Notice for Planning Application 17-02733-OUTM - Business Park adj. Doncaster Sheffield Airport (Site 748) (2018) & AE22 - Decision Notice for Planning Application 18-02759-OUTA - Land To The West Of Doncaster Sheffield Airport (Site 941) (2020)
accounted for in future applications for housing, as set out in Appendix 3 of the Local Plan. Therefore the 280 "up front" houses allocated in Policy 7 are effectively a loan, with the related jobs needing to be ‘paid back’ or accounted for as DSA grows and develops. The Council view the up-front housing allocation of 280 dwellings as a recoupable housing allowance in lieu of job delivery, which the planning applications on sites 748 and 941 show are advancing.

57. The Council is justified in taking this approach as:

- The housing allows the concept of a sustainable mixed use site to have all the ingredients to grow from the outset. It means that employment, commercial / retail (plaza) areas and housing can come forward together, and therefore the potential employees can choose to live close to their work, and shop / spend leisure time near their home;

- The housing will ‘kick-start’ the wider residential development, allowing for one time only housing to come forward first to ensure there are residential elements available more promptly to support initial development, and not subject to waiting for proven job delivery and applications to advance through the planning and construction phases at a later date;

- 280 up front houses provides for an opportunity for some of the initial employees on the employment sites or of the airport to live there should they choose, and supports initial job growth;

- New residents will support the retail and commercial elements as customers, which will encourage perspective businesses to locate here where burgeoning population (alongside growing employees and airport customers) will create service demand and encourage the development of the plaza;

- It can provide capital to support further development of the airport, and so housing can therefore act as a catalyst for further growth and development of the airport and the wider Airport Policy Area. It supports the airport to deliver the wider goals of the DSAM;

- Development can provide confidence to investors and potential businesses that the airport is an attractive place to locate themselves and business at, and that it has the potential to grow in a variety of ways; and

- As per the answer to 10.2c below, the Council believe jobs should justify the need for housing, and that without this check there is a risk that an unsustainable housing development could come forward for 1,200 houses without necessarily having the jobs growth to support it. Therefore, by releasing 280 of these houses up front and requiring the
jobs related to these to be delivered before further housing is justified, the Council is proposing a more careful approach, balancing the need to support the initial phases of development against the need to ensure job delivery is achieved here in the longer term.

58. The allocation of 280 houses 'up front' is a form of catalytic development, which will help support wider airport growth and development, support employment and retail plaza development at the airport and kick-start the wider concept of a sustainable mixed use urban extension – with employment, commercial / retail and housing all co-located and interlinked.

59. Site 940 E2 provides a logical starting point for housing delivery on the overall site (sites 940 E2 and E3), and is the parcel of land most closely related to the proposed plaza, airport access road and the settlement of Hayfield Green (including housing site 837 to the north). It is capable of delivering 280 houses and so this amount will be permitted as the initial allocation, with the jobs linked to this delivered in lieu, with the wider site 940 E3 only supporting housing following the proven delivery of jobs (as below).

c) An additional area of approximately 70 hectares (site 940 E3) for a reserve site for up to 920 houses conditional strictly tied to the delivery of jobs (on the airport site or elsewhere in the Borough if specifically and clearly related to the airport) as set out in part G and Appendix 3.

60. The Council supports the delivery of 1,200 houses on sites 940 E2 and E3, with caveats, for the reasons stated above. However, the Council consider that phasing the delivery of further housing of up to 920 units in addition to the initial 280 is necessary to ensure that, firstly, the airport function remains predominantly economic and that economic development is the key objective and focus of the airport and wider airport policy area; and secondly, that sustainable development is achieved in this location.

61. NPPF paragraph 72(b) states that when planning for large numbers of new housing, as is the case here, there should be sufficient access to services and employment opportunities. Therefore, the Council wish to ensure that employment growth at the DSA (or elsewhere in the Borough if clearly related to the airport) in line with that promoted in the DSAM is delivered, prior to the widespread release of further housing on site 940 E3. Without the levels of employment development proposed being delivered in this location, the justification for the necessity of a large housing site of this nature is significantly weakened.

62. Were housing not linked to the proven delivery of jobs, the Council is concerned that housing would be able to come forward without associated job delivery which justifies it, which would risk creating a large, unsustainable urban extension and not deliver a sustainable mixed use development of housing, jobs and retail / commercial development at the airport as is
63. As it stands, there is not currently the level of employment at the airport, nor the wider service provisions in the local area to support or justify the scales of new housing proposed. The Council are strongly of the opinion that housing on site 940 E3 is only justifiable once the employment growth is delivered to warrant it, as set out in Policy 7.

64. However, should the airport begin to realise the rate of jobs growth that is envisaged, the Council believe the delivery of up to 920 additional homes becomes more justifiable in the interests of co-locating jobs and housing and realising the concept of a sustainable mixed use area centred around the airport. To this end, the mechanism for housing release includes a sliding scale where the number of jobs delivered releases a certain number of houses – with the two in balance (as set out Appendix 3 of the Local Plan).

65. Furthermore, the prospect of housing development acts as an incentive to deliver the jobs growth projected at the airport. More jobs leads to more housing, which supports and increases the viability of the retail element and will create a sustainable mixed use scheme. However, the Council believe that the economic elements must be provided first, and that job delivery and economic growth should be the focus of the airport, after its operation.

66. Given the scale of development, the site can also deliver wider benefits, including supporting the plaza development and encouraging businesses to locate here, new open spaces, and potentially a new school.

67. The Council believe the allocation of this site with a phased delivery linked to job creation strikes the right balance between supporting the ambitions of the DSAM and the wider airport offer, and ensuring that the economic ambitions and new jobs are delivered and secured for the Borough first and foremost.

68. Ultimately, if the airport can deliver the number of jobs the DSAM forecasts it can, then the large amount of housing (up to 1,200 new homes) will be justified and a sustainable community will develop as envisaged in the DSAM. The onus is on the airport operator to deliver the kind of growth envisaged in the DSAM, and should it do so, then the levels of economic growth will support and justify the release of land for housing on site 940 E3 and see the growth of a sustainable mixed use site around, and linked to, the airport.

d) Should any housing completions on allocated sites 940 E2 and E3 be counted towards achieving the strategic aim of delivering 18,400 new homes in the Plan period?
69. As set out in the Housing Topic Paper, the Council is strongly of the opinion that the housing opportunity presented here is a unique case which reflects a specific circumstance and opportunity at the airport. The Council therefore believes that housing development proposed on sites 940 E2 and E3 sits apart from the wider spatial strategy. As such, we do not believe that housing delivered on this site should count towards the strategic aim of delivering 18,400 new homes in the plan period, which will and can otherwise be met through housing allocations in line with the spatial strategy.

70. Instead, housing on sites 940 E2 and E3 are a special case which justify a separate approach. They exist to support the economic growth and wider development of the airport and the aspiration of a sustainable mixed use jobs led development as opposed to the wider strategic aims of the Local Plan, which have been established separately and have enough housing allocated across the Borough to meet the requirements of. This includes the settlement of Auckley – Hayfield Green, which can meet its housing requirements on two housing sites outside of the airport policy area. Through the settlement strategy, local areas will receive a share of housing to meet their local needs, with larger settlements receiving more housing to deliver housing related to the Borough’s economic ambitions. The housing proposals at the airport do not accord with this strategy for distributing housing and therefore sit aside from it, and the Council believe the proposals and scale of economic opportunity and potential at the airport justify this separation.

71. Additionally, housing which comes forward on site 940 E3 is conditional and linked to the proven delivery of jobs at the airport. Unlike other allocations which do not have such conditions, there is no guarantee that these houses in particularly can be counted on as a certain source of housing, nor can there be certainty about timeframes given the conditions that must be met to justify release.

72. Therefore, as the housing proposals sit outside of the settlement strategy and are linked specifically to the growth of the airport and the opportunity the airport presents for the Borough and the City Region, the Council believe any housing delivered on sites 940 E2 and E3 should remain as additional to that delivered through allocations to meet the requirement for 18,400 new homes in the plan period, and that including them within calculations would impact on the delivery of houses within the wider Borough and the implementation of the wider Borough strategy through risking decreasing housing delivery needed in other locations in the Borough where it has been assessed as being necessary for housing to be directed towards through the settlement strategy.

73. Please also see the Council response to Matter 5.3d.

---

42 DMBC4 - Housing Topic Paper, para. 4.8.13., pp. 49
43 SDEB3 - Settlement Strategy, para. 3.1 – 3.4; 4.1 – 4.7 & section 4.11
44 Council Hearing Statement - M5, pp. 7
Q10.3. Is the approach in policy 7 part I to the provision of additional car parking at the airport, and the presumption against off-site car parking, justified and will it be effective in helping to promote sustainable transport?

74. As the airport grows and expands, there will be an inevitable rise in passenger numbers. There is already a bus connection between DSA and both Doncaster and Sheffield (via Wickersley and Bramley) respectively (from Doncaster Interchange and Sheffield Interchange, both adjacent to train stations) which provides passengers with an alternative to driving to the airport. It is also envisaged that improved rail links to the airport (please see question 10.5) can help to deliver a sustainable alternative to car journeys.

75. However, it is also the case that the growth of DSA will see an increase in car trips to the airport. The airport now has excellent access to the M18 J3 via the Great Yorkshire Way, which has opened up opportunities for the airport to expand its passenger and freight operation. For some, driving will remain the most convenient and preferable option, and therefore Policy 7 seeks to support increased car parking provision at the airport in order to accommodate the growth in demand and acknowledge that the inevitable increase in passenger numbers will result in an increase in trips by car.

76. The APF acknowledges that "high quality, efficient and reliable road and rail access to airports contributes greatly to the experience of passengers, freight operators and people working at the airport".\(^\text{45}\) It goes on to specifically list £18 million which was awarded to Doncaster Council to improve road accessibility and help to fund what is now the Great Yorkshire Way.\(^\text{46}\) The APF therefore acknowledges and supports better road connectivity and car access to airports, and improvements to accommodate this. This improved connectivity, along with the improving aviation offer from the airport, will result in more car trips which will need car parking to accommodate them.

77. Providing on site car parking is in line with NPPF 102(e) which states that transport issues such as car parking should be considered from the earliest stages of plan making and development proposals to ensure they are integral to design and make high quality places, which Policy 7 allows; and NPPF 104(e) which requires planning policies to provide the infrastructure required to support their expansion, operation and contribution to the wider economy – in this case facilitating the increase in passenger numbers and the associated economic benefits of this increase.

78. It is considered that the most sustainable way to do this is to accommodate this within the Airport Policy Area and in locations walkable to the airport terminal, and therefore prevent less sustainable locations or speculative

\(^{45}\) OTH52 - Aviation Policy Framework, para. 1.96, pp. 37
\(^{46}\) Ibid. para. 1.97, pp. 37
informal car park alternatives (such as nearby fields or streets close by) from being used for airport related car parking. The DSAM, in line with guidance in the APF explains how increased car parking will be accommodated.\textsuperscript{47} \textsuperscript{48} It also sets out that car parking is expected to be on a “reducing ratio of car parking spaces to passengers, to reflect the expected increase in travel to the airport by sustainable modes”.\textsuperscript{49}

79. Furthermore, the DSAM highlights that there is an issue with “leakage” of passengers from local areas to other airports, which in turn leads to unnecessary car journey’s and less sustainable trips.\textsuperscript{50} An improved airport offer (including suitable car parking opportunities) can help prevent passengers undertaking longer journeys to other airports and instead undertake comparatively shorter and more sustainable road journeys to DSA.

Q10.4. Is the support in policy 7 part J.2 (and policy 13 part A.9) for road access from the M18 to the airport justified and consistent with national policy?

80. The APF supports improved road accessibility to airports and specifically uses the Great Yorkshire Way connection between the airport and Junction 3 of the M18 as an example of how this can be achieved.\textsuperscript{51} The APF states that “We are committed to working with airport operators, transport operators, local authorities and LEPs to improve surface access to airports across the country, whilst taking into account the associated environmental impacts. We are already contributing funding to make this happen”.\textsuperscript{52}

81. Improved access to the South East of Doncaster from M18 Junction 4 would look to support connections to key housing and employment sites. A connection at this point would reduce journey length for journeys using the M18 corridor from the North and would also offer significant accessibility to housing and employment without the need to use the Strategic Road Network. Currently this is conceptual and is looking at potential delivery towards the end of the proposed plan period as a precursor to the next local plan to help facilitate future potential development.

Q10.5. Is the support in policy 7 part J.1 (and policy 13 part B.1) for a new railway station at the airport and electrified main line rail connection to the East Coast Main Line (as indicated on the key diagram) justified and consistent with national policy?

\textsuperscript{47} OTH53 - Doncaster Sheffield Airport Masterplan 2018 – 2037, pp. 66
\textsuperscript{48} OTH52 - Aviation Policy Framework, Annex B, B4, pp. 81
\textsuperscript{49} OTH53 - Doncaster Sheffield Airport Masterplan 2018 – 2037, pp. 77
\textsuperscript{50} OTH53 - Doncaster Sheffield Airport Masterplan 2018 – 2037, pp. 18
\textsuperscript{51} OTH53 - Doncaster Sheffield Airport Masterplan 2018 – 2037, pp. 18
\textsuperscript{52} Ibid.
82. Yes. NPPF 102 is clear that transport issues should be considered from the earliest stages of plan-making and development proposals, including opportunities to promote public transport use being identified and taken forward. Paragraph 103 also goes on to state that significant development should be focussed on locations which are, or can be made, sustainable through offering choice of transport modes to reduce congestion and emissions and improve air quality. Paragraph 104(e) is clear policies should provide for any large-scale transport facilities alongside the infrastructure and wider development required to support their operation.

83. The Aviation Policy Framework is clear on its support for integrating airports into the wider transport network, including rail access. In tune with NPPF paragraphs 102 and 103, it states that rail offers opportunities for efficient and environmentally friendly connections to airports helping to reduce CO₂ emissions and congestion, whilst improving air quality. It also commits the Department for Transport to work with airport operators, the rail industry, local authorities, Local Enterprise Partnerships, and other Stakeholders to improve rail access to airports in the future. This includes longer-term options for enhancing rail services to airports looking at route-based studies relating to individual airports alongside the needs of rail passengers and freight operators as a whole.⁵³

84. The Doncaster Sheffield Airport East Coast Main Line (ECML) station involves providing a new rail connection from the North and South of the Airport and would support the housing growth that has been seen in the area already, alongside further housing provision during the plan period. Work has been undertaken to demonstrate the benefits not only to the airport but to the wider community through the provision of a park and ride facility that would reduce the need for commuters to access the rail network through Doncaster Station. The ECML connectivity would provide journeys to London, Leeds and York as well as providing a local rail connection with Doncaster.

85. The station will serve as a park and ride facility with no other rail stations located in the South of the Borough. The station would provide access to employment via sustainable modes both to employees at, and in and around the Airport. As well as this, it will allow residents in the local area(s) to access employment and services both in Doncaster and cities such as Sheffield and Leeds via train where currently the journey is likely to be by car. Journeys to London and the South would not require travel into Doncaster. Currently rail connectivity to the airport is only achieved via bus services to either Doncaster or Sheffield interchanges.

86. The Council’s response to Matter 12 (Transport & Access), and in particular Question 12.3,⁵⁴ sets out some of the above already, including further details

---

⁵³ OTH52 - Aviation Policy Framework, para 1.92 – 1.95 & 1.99, pp. 36 - 38
⁵⁴ Council Hearing Statement - M12 pp 5
Q10.6. Are the requirements in policy 7 relating to a comprehensive airport-wide masterplan exercise (part K); specific development guidelines about safeguarding areas (part L.1) and a strategic delivery plan (part L.2); and green infrastructure (part M) justified and consistent with national policy?

K) Masterplan exercise

87. The airport has developed and published the DSAM. The Aviation Policy Framework sets out how airports should create master plans for airport development, suggested content and the reasons why they should do this.\(^{55}\) However, these masterplans differ in content and purpose from masterplans or design codes and guides that are used more specifically to guide development and design of large new housing development within the Borough.

88. Policy 43 part C of the Local Plan (Good Urban Design) requires that major applications and multi-phase developments use urban design ‘tools’ such as masterplans, design guides and design codes to provide certainty over design intentions and secure development quality.\(^{56}\) Such methods have previously been successfully employed in the Borough, in areas such as Woodfield and Carr Lodge\(^{57}\) to ensure the holistic development and delivery of large sites.

89. Given the scale of proposals at the airport, the multiple uses promoted (retail, commercial, general employment and housing), and the way Policy 7 is structured to support the phased the release of housing linked to job delivery which could, if not managed carefully, result in piecemeal development, the Council believe it is important that Policy 7 ensures that a masterplan exercise is undertaken to guarantee a holistic approach to development, and in doing so, sets out from the outset what the development and design expectations are across the site.

90. As aforementioned, such master planning differs from the intentions of master planning as set out in the APF and the subsequent draft airport masterplan for the airport. NPPF Chapter 12 promotes the creation of well-designed places, and sets out how this can be achieved.

91. NPPF paragraph 124 notes that “good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations...is essential for achieving this”. It also promotes effective

\(^{55}\) OTH52 - Aviation Policy Framework, para. 4.11 – 4.15, pp. 69 – 70 & Annex B, B1 – B7, pp. 80 - 81
\(^{56}\) CSD3 - Doncaster Local Plan 2015-2035 Regulation 19 Publication Version, pp. 133 - 134
\(^{57}\) For an example, please refer to OTH9 - Carr Lodge Design Code SPD
engagement between applicants, communities, local planning authorities and others. NPPF paragraph 126 goes on to promote the use of tools such as design guides and codes “to provide maximum clarity about design expectations at an early stage”.

92. In Policy 7 setting out the expectations that development proposals should be informed by comprehensive area wide masterplanning, and setting out in the supporting text (5.15 – 5.37) how this should be undertaken, Policy 7 and Chapter 5 meets with NPPF paragraphs 124 – 126, and will ensure therefore that the overall site will accord with NPPF paragraphs 127 – 129, as well as Local Plan Policy 43. This is justified in the interests of creating a well-designed place informed by a holistic approach to development, which is necessary to tie in the various elements set out in Policy 7 and ensure the different elements and phasing does not lead to piecemeal and fragmented development in this area.

**L1) Safeguarding Areas**

93. The Aviation Policy Framework requires airport operators to maintain safeguarding maps to ensure that the airport operator is consulted over planning applications which might conflict with the safe operation of the airport. The ways in which areas should be safeguarded are set out in DfT Circular 01/2003, and reflected in Local Plan Policy 7 Part L1. The inclusion of this within Policy 7 and on the Policies map ensures that this matter is clear from the outset for the avoidance of doubt, and provides absolute clarity as to where safeguarded areas refer to, and subsequently when and under what circumstances consultation with the airport will be needed.

**L2) Strategic Delivery Plan**

94. The DSAM and the growth envisaged at the airport will result in an increase in the various forms of transport linked to the airport and the wider area. This includes the likely increase in car / lorry road usage (passenger, employee, resident and freight); bus usage (passenger, employees, residents); and potentially a rail link to the ECML.

95. The growth of the airport will have impacts on all forms of transport and transport infrastructure, and therefore the policy requires a strategic delivery plan to assess the implications of growth and to identify interventions necessary to support the masterplan. This allows the Council to be informed of the cumulative impact of the masterplan.

---

58 OTH52 - Aviation Policy Framework, para. 5.10, pp. 74
59 OTH67 - Safeguarding aerodromes, technical sites and military explosives storage areas (DfT Circular 01/2003), Annex 2
96. This is in line with NPPF paragraph 102(a), which requires that transport issues should be considered from the earliest stages of plan – making and development proposals, to ensure that the potential impacts of development on transport networks can be addressed. A strategic delivery plan will provide the means to assess the impact on transport networks and plan for how these will be managed and mitigated. It also ensures that proposals at the airport accord with NPPF paragraph 102(b) in that transport opportunities can be realised, and NPPF paragraph 103 in ensuring that development at the airport can be made sustainable.

97. Improved rail and road links to airports are also promoted through the APF.  

M) Green Infrastructure

98. Development proposals within the airport policy area involve a significant land take, which will result in significant habitat losses and impacts on ecological networks. The Airport Policy Area includes the Local Wildlife Sites of Hurst Wood and Finningley Big Wood. The impacts need to be measured, understood, and mitigated against. The DSAM alludes to the fact that a comprehensive green infrastructure plan may be required.

99. The Council believe that for development of this nature and scale a green infrastructure strategy must be produced in order to ensure that the matter of ecological impact is measured, understood, mitigated and enhanced by the development. The justification for this is set out in the supporting text of the Local Plan (para. 5.25 – 5.27), which explains how this should be undertaken, and why.

100. This requirement is in line with NPPF paragraphs 170d; NPPF paragraph 171, which requires plans to “...take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure...”; and NPPF paragraph 174a. The APF also advises that airport masterplans such as the DSAM should cover the impact on the natural environment, proposals to minimise and mitigate impacts, and address landscape and biodiversity impacts. The Council would like to ensure this is addressed appropriately within the masterplan exercise proposed within Policy 7.

---

60 OTH52 - Aviation Policy Framework, para. 1.92 – 1.108, pp. 36 - 39
61 OTH53 - Doncaster Sheffield Airport Masterplan 2018 – 2037, pp. 85