For and on behalf of
Higgins Agriculture Ltd and Bellway Homes (03467)
South Yorkshire Housing Association (05214)

DONCASTER LOCAL PLAN EXAMINATION
STAGE 4 HEARING SESSION REPRESENTATION
MATTER 10 DONCASTER SHEFFIELD AIRPORT

Site Ref: 189 - Higgins Site, Old Bawtry Road, Finningley
Site Ref: 446 - Mosham Road / land east of Hurst Lane, Auckley

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<table>
<thead>
<tr>
<th>CONTENTS</th>
<th>PAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.0 INTRODUCTION</td>
<td>4</td>
</tr>
<tr>
<td>2.0 RESPONSE TO INSPECTORS QUESTIONS</td>
<td>5</td>
</tr>
</tbody>
</table>
1.0 INTRODUCTION

1.1 This representation has been prepared by DLP Planning Ltd on behalf of Higgins Agriculture Ltd* and Bellway Homes, and South Yorkshire Housing Association in response to the Stage 4 Examination Hearing Sessions of the Doncaster Local Plan.

1.2 This representation addresses Matter 10 in relation to the following sites:

- Site Ref: 189 - Higgins Site, Old Bawtry Road, Finningley
- Site Ref: 446 – Mosham Road / land east of Hurst Lane, Auckley

1.3 This document should be read alongside previous representations on the publication version of the Plan, as submitted in September 2019.

*NB – The representor (03467) previously referred to as Higgins Agriculture Ltd is herein referred to as M Higgins Ltd.
2.0 RESPONSE TO INSPECTORS QUESTIONS

Matter 10 – Doncaster Sheffield Airport

**Issue - 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.

2.1 Part a) - As set out in DLP’s previous Regulation 19 representations for sites 189 and 446, the support for Doncaster Sheffield Airport (DSA) outlined in the publication version of the draft Plan is endorsed because this strategically important location is central to the strategic priorities of the Plan area and the delivery of the Local Plan’s objectives. However, there are a number of issues of soundness regarding the relationship between DSA and the Council’s approach to the wider spatial strategy. These concerns should be read in the context of the SPRU commentary provided at Appendix 2 of the Regulation 19 representations regarding the appropriateness and the housing requirement identified in the Pre-Submission Local Plan and the resulting outcomes for scale and distribution of development.

2.2 The Appendix highlights the need to ensure that the number of new homes proposed in Policy 3 adequately reflects the requirement to support economic growth and availability of labour to meet the future potential for growth in the number of jobs in the Borough. The Council must consider a more flexible approach to the scale and distribution of growth to recognise the range of potentially suitable locations to meet development need identified under the Government’s Standard Method plus the component of the requirement necessary to support economic growth and ensure the delivery of affordable housing.

2.3 Policy 7 should be modified to ensure that it is effective, positively prepared and appropriately
justified (in accordance with the criterion for a Plan to be ‘sound’ as set out in paragraph 35 of the NPPF). As set out in DLP’s response to Matter 3 (paragraph 2.17), the residential allocations identified in Policy 7 do not wholly reflect those within the Draft DSA Masterplan, which also identifies site 446 for residential development.

2.4 Part d) - In relation to the potential for job growth at DSA, the draft Plan looks to divorce DSA from its role in the wider spatial strategy, which is significant because it overlooks the existing demand for jobs (and by association the requirement for homes and labour supply) associated with the role of DSA as a growth driver. This raises issues of consistency with national policy due to the ability of DSA to support a prosperous rural economy. Specifically, the spatial strategy fails to recognise that a number of settlements in close proximity to DSA, namely Finningley and Auckley-Hayfield, have significant potential to support sustainable patterns of development associated with the delivery of housing and economic growth (consistent with paragraphs 78 and 83 of the NPPF and achievement of the airport’s objectives). It is therefore not justified that the proposed spatial strategy and the approach to the scale and distribution of housing outlined in Policy 3 does not support any contribution to the economic-led component of housing growth at Service Towns and Larger Villages in close proximity to DSA.

2.5 As such, it is advocated that suitable sites that are sustainably located in relation to Finningley and Auckley-Hayfield, and which complement the strategy for DSA, should be identified to meet the need for jobs-led growth in the overall housing requirement, and it is appropriate that such sites contribute towards the Borough’s identified housing needs without their delivery being directly linked to jobs growth at DSA.

2.6 Further to the above, the significant ‘gap’ between the assumptions for job growth in the DSA Masterplan and the potential for development identified in Policy 7 indicate that this element of the spatial strategy is not positively prepared. Our soundness concern is related to the fact that the relationship to potential jobs growth (and existing levels of employment at DSA) is based on an extremely narrow interpretation of the Masterplan’s explanation of the airport’s contribution towards economic development. The approach to identifying the ‘baseline’ (around 1,000 jobs, see page 6 of the Masterplan) in Policy 7 also wholly fails to acknowledge significant existing planning commitments that complement opportunities for jobs growth outside of the DSA Masterplan (and Local Plan allocation) boundary. This interpretation of
the ‘baseline’ in terms of its relationship with future potential and the economic-led component of housing growth to support necessary growth in the labour force is not justified.

2.7 The allocation and delivery of site 189 would contribute towards the Plan housing requirement and support achieving the economic growth-led component of the housing requirement given its proximity to DSA, thus complementing the potential for economic development at this location.

2.8 Site 446 would represent an appropriate contribution to the scale and distribution of growth as part of the spatial strategy, which would ensure a positively prepared response to local demand for growth. Allocation of the site would be consistent with the objectives of the DSA Masterplan and would overcome soundness concerns regarding the Council’s proposed approach to restrict housing growth directly related to an increase in jobs at DSA. Delivery of this site would also support achievement of the economic growth-led component of the housing requirement given the proximity to DSA, and it would thus complement the potential for economic development at this location.

2.9 Both sites are partially or entirely brownfield land and for ease of reference for the Inspector, Figures 1 and 2 indicate the proximity of sites 189 and 446 to the DSA Policy Area.

Figure 1: Aerial view image of site 189 (Source: Google Maps)
2.10 No further comment.

**Issue - Housing-Led Mixed Use Urban Extension**

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?

2.11 Part a) - No further comment.

2.12 Parts b and c) - As discussed in comprehensive detail in DLP’s Matter 1 and 3 Hearing Statements, site 940 (Site 1 Land east of Poplars) scores worse than both site 189 and 446, both of which are partly or wholly brownfield land, at paragraph 3.1 and summary tables 8.17 and 8.23 in the Sustainability Appraisal assessment of the sites (CSD7.1). The approach is
therefore unsound. It is not considered appropriate that such limited housing allocations have been identified in reasonably sized settlements such as Finningley and Auckley, with the only justification being that extant permissions will deliver a suitable amount of housing. Notwithstanding the points raised above, that the airport acts as an economic driver indicating that surrounding settlements should be the focus for higher levels of growth, the extant permissions cited by the Council have not commenced and may suffer from issues preventing their delivery.

2.13 Table 7.26 of the Sustainability Appraisal (CSD7.1) simply sets out the Council’s reasons for selecting and rejecting potential housing sites, and it appears that rather than being a tool for planning sustainable plan-making, the Sustainability Appraisal (CSD7.1) has been retrofitted to support certain site selections. In the case of site 940, it does not justify an allocation of this size and impact, given the more sustainable reasonable alternatives with a similar spatial relationship to the airport, as is the case with sites 189 and 446. Indeed, site 446 is identified within the DSA Masterplan as an area for future housing delivery (as set out in the previous Regulation 19 representations that DLP prepared for site 446).

2.14 It would appear that reducing the size of the allocation at Poplars (site 940) to less than the 1,200 dwellings proposed and a redistribution of these units to other more sustainable sites would deliver not only the sustainability benefits identified in the Sustainability Appraisal (CSD7.1) but also reduce the harmful impact of site 940 and assist in the general rate of delivery by expanding the choice of location and developers as recommended by the Letwin Report.

2.15 Part d) - Policy 6 in the publication version of the draft Plan sets out that tables H3 (A-E) identify sites that are designated as reserved development sites. Policy 6 then states the following:

“They are suitable for housing (or mixed-use including housing) development but are not currently considered developable in the plan period. Housing (or mixed-use including housing) development will be supported in accordance with the policies of the Local Plan and will be additional to the allocated land supply.”

2.16 Site 940 E2 and E3 are reserved sites (‘Potential Housing-led Mixed Use Allocations’) and their delivery is expressly linked to employment growth. Therefore, they cannot be relied upon within the context of paragraph 16 of the NPPF, and they should not be counted towards achieving the strategic aim of delivering 18,400 new homes in the Plan period.
**Issue - Access to and Car Parking Serving the Airport**

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?

2.17 No further comment.

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?

2.18 No further comment.

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?

2.19 The reference in Policy 7 advocating a new station at Doncaster Sheffield Airport is strongly supported because such infrastructure provision would support the sustainable development of the DSA Policy Area.

2.20 However, whilst the aspiration to cite the railway station adjacent to the airport terminal is understood, this approach requires new lines to be delivered to connect the site into the existing terminal. The delivery of this infrastructure is anticipated to be very costly and will have implications for the flexibility of use of other land within the DSA policy area (working around the track route) and could increase the cost of delivering other infrastructure within the site.

2.21 As set out in DLP’s Regulation 19 submissions, the DSA Masterplan has previously advocated the provision of a community railway station between Hayfield-Green and Auckley on the existing Doncaster to Lincoln line and indeed planning permission was previously granted for a station in this location. Policy 7 should make provision for this opportunity to be pursued should the airport station be unviable, particularly as the community station would be more cost-effective and would offer wider benefits to the existing community.

2.22 The delivery of the site would be supported by the allocation of site 446, which includes land to form the northern station platforms. The delivery of housing in this location could contribute to the delivery costs of the station and would link the village of Auckley to the station.

2.23 Policy 7 should be amended on this basis to also ensure that it is consistent with Paragraph
118d of the NPPF which promotes the effective use of land through the development of underutilised land, especially if this would help to meet identified needs for housing.

**Issue - Masterplanning and Development Requirements**

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?

2.24 No further comment.

**Inspector’s Note No. 6 – Additional Question for Matter 10**

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?

2.25 Yes. Reference to Use Class E should be included in Policy 7 because Use Classes B1a, B1b and B1c now all fall under Use Class E. The Local Planning Authority will also need to consider what the implications of referencing Class E will be for the strategic aims of the employment part of the policy (part c) because several other uses now also fall under Class E such as (but not limited to) shops, cafes and restaurants, creches and gymnasiums.