Doncaster Local Plan 2015-2035: Examination in Public

Hearing Statement by Peel L&P / Doncaster Sheffield Airport Limited

Matter 3: Strategic Approach

2 September 2020
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1. Introduction

1.1 This Statement is prepared by Turley on behalf of Peel L&P and Doncaster Sheffield Airport Limited (hereafter referred to as “Peel” and “DSAL” respectively) in respect of the examination of the Doncaster Local Plan 2015-2035 (“DLP”). It provides Peel’s and DSAL’s response to the Issues and Questions identified by the Inspector in respect of Matter 3: Strategic Approach, as set out in Inspector’s Note 4.1.

1.2 In overall terms, Peel and DSAL are fully supportive of the emerging DLP and consider that it is imperative the plan proceeds to adoption to ensure that Doncaster has an up-to-date Local Plan as required by national planning policy, and one which provides the policy tools for the planning system to support sustainable growth, including aviation growth, in accordance with national planning and aviation policy. Notwithstanding such general support, Peel / DSAL have identified a number of specific issues and concerns relating to the soundness of specific policies. Amendments to the relevant policies are suggested, without which those policies are not considered sound. The representations2 and the comments set out in this Statement demonstrate how such concerns can be readily addressed through Modifications to the policies such that the DLP can be found sound.

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1 Inspector’s Note No. 4: Matters, Issues and Questions, 11 June 2020 [INSP4]
2 Doncaster Local Plan (Regulation 19) Proposed Submission Version: Representations on behalf of the Peel Group (September 2019) [ref. 04288]
2. **Matter 3: Strategic Approach**

**Spatial Strategy**

Q3.2. Is the broad spatial distribution of development proposed in policies 2 and 3 justified? In particular, the aims to accommodate:

a) At least 50% of new homes in and around the Main Urban Area; approximately 40% at seven Main Towns; and about 10% at ten Service Towns and Villages.

b) The ranges for the number of new homes in and around each of the individual Main Towns and Service Towns and Villages.

c) Major new employment sites in locations accessible from the Main Urban Area and Main Towns in locations attractive to the market with good access to the strategic transport network as well as Doncaster Sheffield Airport.

d) Retail, leisure, office, cultural and tourist developments in the network of town centres defined in Table 2.

2.1 It is evident that Polices 2 and 3 aim to locate new development principally in the Borough’s main settlements and in close proximity to other key drivers of growth, including DSA. This is a sustainable approach which will mean that new residential and economic development is located in close proximity to existing and planned services, facilities and supporting infrastructure.

2.2 Policy 2 states that new employment sites will be located in areas which are accessible to, *inter alia*, DSA. This statement is welcomed and supported by Peel / DSAL. However, DSA is otherwise excluded from the policy. It is not identified within the settlement hierarchy or spatial strategy. Peel considers that the DLP is not justified or effective in this regard given both the importance of DSA within the spatial profile of the Borough and the scale of growth which is planned there.

2.3 Airports are important drivers of economic growth and are commercial locations in their own right. They are recognised by the Independent International Connectivity Commission Report 2017³ (page 20) as locations which can act as economic lynchpins,

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supporting the attraction of Foreign Direct Investment (FDI) from a wide range of businesses which may wish to benefit from a location immediately adjacent to – and directly accessible from – an airport.

2.4 DSA itself has long been identified as an area suitable for significant growth as an economic-led mixed-use cluster, including in the previous Doncaster Core Strategy. Its attractiveness and accessibility has recently been enhanced through the opening of Great Yorkshire Way, which now presents a direct road connection into the DSA estate from the M18 motorway and beyond. DSA is therefore identified as a key economic driver and major growth opportunity in the Strategic Economic Plan (SEP) for the Sheffield City Region (SCR). Indeed, the SEP sets out that the growth of DSA is one of seven key spatial priorities for the SCR noting that:

“This and surrounding areas to be recognised as a catalyst for business development, inward investment and job creation with regard to logistics, engineering and associated aviation activities.”

2.5 It is therefore clear that the DSA estate is a key part of Doncaster Borough’s spatial profile and significant mixed-use growth is planned there (see draft Policy 7). Indeed, a key part of the masterplan proposals for the growth of DSA – the delivery of new employment floorspace for logistics and advanced manufacturing uses associated with and on land west of the Airport (referred to as Site 941 ‘Land East of Poplars Farm’ in the DLP) – has now secured planning permission. However, DSA is not currently included within the settlement hierarchy or spatial strategy of the DLP. This omission is easily rectified, but in its current form, has the effect that the Policies 2 and 3 are not fully consistent with the requirement set out in the Framework for strategic policies to “...set out an overall strategy for the pattern, scale and quality of development...” (paragraph 20).

2.6 Whilst the mixed-use growth area proposed, committed and supported at DSA by draft Policy 7 sits outside the economic and housing delivery strategy (see Peel’s / DSAL’s

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4 Doncaster Council Core Strategy 2011-2028 [OTH3]
5 Strategic Economic Plan: A focused 10 Year Plan for Private Sector Growth 2015-2025, Sheffield City Region Local Enterprise Partnership (March 2014)
6 On 31 October 2018 Peel submitted an outline planning application (ref. 18/02759/OUTA) which proposed the development of land to the west of Doncaster Sheffield Airport – referred to as Site 941 ‘Land East of Poplars Farm’ by the DLP – for B1c/B2/B8 and ancillary uses. The application was approved by the Council on 7 May 2020.
Statement in respect of Matter 2, it is nevertheless an integral part of the Plan in terms of development needs, economic growth ambitions and plans, and the spatial distribution of growth on a Borough and sub-regional basis. In simple terms, it forms part of the overall “pattern” and scale of development which will be delivered across the Borough within the plan period. As such, for clarity, consistency and completeness, draft Policy 2 (including Table 2 – network and hierarchy of town centres – see below) and draft Policy 3 (including the growth distribution table presented in the policy) ought to refer to the full development proposition at DSA. Suggested modifications to Policies 2 and 3 in this respect are set out at Appendices 1 and 2 respectively.

2.7 The amended wording to the policy will ensure that the strategy is:

- Consistent with the requirement at paragraph 20 of the NPPF (referred to above);
- Effective⁷ - in that it identifies and explains the full scale, location and pattern of growth to be provided across the Borough within the plan period, irrespective of the extent to which that growth is contributing towards development needs.

2.8 Moreover, Policy 2 of the DLP sets out a network and hierarchy of centres across the Borough within which retail, leisure, office, cultural and tourist developments will be located. The network/hierarchy of centres is identified in Table 2. However, Table 2 does not include the proposed allocation for the new Central Plaza at DSA for such uses, which is set out within Policy 7 and which will in effect create a new centre within the Borough⁸. The Table should therefore be updated to recognise the proposals for Central Plaza. This is required to ensure that the Policy is effective in:

- Identifying the locations of both existing and planned town centre development growth across the Borough.
- Making clear that applications which accord with the allocation set out at Policy 7 will not be subject to the town centre sequential and impact tests set out in the Framework [OTH39] for proposals for town centre uses on sites in non-town centre locations. Such an approach would be in line with the expectation in the

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⁷ In accordance with paragraph 35 of the Framework [OTH39].
⁸ The proposals for the Central Plaza are described and explained in Peel’s representations to the Regulation 19 DLP [ref. 04288].
Framework that policies set out “...how a decision maker should react to development proposals...” (paragraph 16).
Appendix 1: Suggested modification to Policy 2

Peel’s / DSAL’s suggested modification to Policy 2 is set out below in red and underlined text as follows:

“1) Doncaster Main Urban Area, and airport policy area at Doncaster Sheffield Airport

Doncaster Main Urban Area provides services for the whole Borough and beyond. To strengthen this role and to meet its growth objectives and regeneration needs, Doncaster Main Urban Area will be the main focus for development in the Borough, including housing, retail, leisure, cultural, office and other employment development.

As a ‘Sub-Regional Centre’, Doncaster Town Centre will continue to provide the main focus for most new retail, offices, leisure, cultural and tourist facilities with the defined ‘District’ and ‘Local Centres’ serving more day-to-day needs.

Growth and investment at Doncaster Sheffield Airport, will be supported to enable its development and expansion in line with the principles set out by Policy 7. The Airport Policy Area at Doncaster Sheffield Airport (defined on the Policies Map) will be a focus for sustainable growth, including the delivery of new homes, employment floorspace and a new centre.

Additional growth on non-allocated sites in appropriate* locations within the Development Limits of the Doncaster Main Urban Area will also be considered favourably.”
Appendix 2: Suggested modification to Policy 3

Peel’s / DSAL’s suggested modification to Policy 3 is set out below in red and underlined text as follows. Similar amendments would also be required to the Table included within the Policy.

“The Local Plan’s strategic aim is to facilitate the delivery of:

- at least 481 hectares of employment land over the plan period (2015-2035) to help grow and diversify the Sheffield City Region economy, increase productivity and widen access to learning and training opportunities. The identified land will accommodate business, light industry and manufacturing and distribution and warehouse uses to meet future employment needs on sites that are attractive to market investment and can be accessed via a range of transport modes. A number of sites are allocated which help meet the regeneration needs of the Borough;

- 18,400 new homes in the period 2015 – 2035 (920 per annum), with sufficient land allocated to deliver 15 years’ supply of housing (13,230, or 882 dwellings per annum, once supply in the years 2015 – 2018 is deducted from the overall requirement). For the purposes of calculating 5-year housing land supply, the requirement will be based on the Local Housing Need figure, as derived from the Standard Methodology, which will be reviewed and revised throughout the plan period in line with the latest household projections and affordability ratio. As such, the housing requirement is expressed as a range with the bottom of the range being the Local Housing Need figure and the top of the range being 920 dwellings per annum;

- new retail, leisure, office, cultural and tourist developments in accordance with the defined Network of Centres. Doncaster Town Centre will be the main location for offices and commercial uses, further education, regional retailing centre, transport hub, civic uses and range of leisure uses.

Additional development will be accommodated at Doncaster Sheffield Airport. The Airport Policy Area at Doncaster Sheffield Airport (defined on the Policies Map) will be a focus for sustainable growth, including the delivery of new homes, employment floorspace and a new centre, as set out by Policy 7.

To meet the Local Plan’s Spatial Strategy and Settlement Hierarchy, this the growth requirements referred to above will be is distributed as follows:”