Doncaster Local Plan 2015-2035: Examination in Public

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

Matter 5: Housing Supply

2 September 2020
1. **Introduction**

1.1 This Statement is prepared by Turley on behalf of The Peel Group and Doncaster Sheffield Airport Limited (hereafter referred to as “Peel” and “DSA” respectively) in respect of the examination of the Doncaster Local Plan 2015-2035 (“DLP”). It provides Peel’s and DSA’s response to the Issues and Questions identified by the Inspector in respect of Matter 5: Housing Supply, 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 these 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 5: Housing Supply

Overall supply for the Plan period 2015 to 2035

Q5.3. Should Table 5 of the Plan be modified to include the following, having regard to policies 2, 3 and 11 relating to development on unallocated sites and policy 7 relating to Doncaster Sheffield Airport:

a) A windfall allowance of 3,400 new homes, or some other figure?

b) 290 windfalls at Defined Villages?

c) 197 new homes on windfalls on sites identified in the brownfield register 2019?

d) New homes at Doncaster Sheffield Airport?

Should any such housing completions count towards achieving the aim of delivering 18,400 new homes in the Plan Period?

2.1 Peel’s / DSAL’s specific interest relates to Doncaster Sheffield Airport (DSA) – part (d). Peel / DSAL agree with the approach taken in the Plan, reconfirmed by the Council in its response to PQ27, that any completions of the allocated sites at DSA will not be counted towards achieving the aim of delivering the identified requirement for the provision of 18,400 homes or be included in Table 5.

2.2 Policy 7 of the DLP (as drafted) reflects a relationship between the co-location of employment-generating development and housing at DSA. This is reflected in the policy link between the creation of new jobs and the justification for the delivery of new housing\(^3\), which will assist in ensuring that the development of DSA is being undertaken in a truly sustainable manner.

2.3 The Council is correct to exclude related housing, given that the trigger point or phasing mechanism is outside of the usual tests of deliverability i.e. it is dependent upon jobs being created in future years. Delivery at DSA is therefore additional to the identified supply to meet the housing requirement of 18,400.

2.4 Should, however, the Plan’s identified supply fail (in an early phase of the Plan) to deliver sufficient housing to either maintain a 5-Year housing land supply (5YHLS) and/or to deliver the housing requirement over the Plan period, housing at DSA could be brought

\(^{3}\) Set out at criterion F) of Policy 7 and at Annex 3 of the DLP.
forward more quickly as a sustainable means of meeting the identified housing requirement, without the policy link to employment provision (see response to Q5.12 below).

2.5 The Inspector has correctly identified [INSP4] that the growth of DSA is understood to play a key role in driving local and regional growth and that the Council’s justification for the provision of the upper end of its housing requirement range (920 dpa) responds to this positive growth agenda. Peel / DSAL agree that the development of DSA will form an integral part of the borough’s intended success in achieving its aspiration to maintain a strong level of job growth (1.0% per annum), and also recognises the importance of DSA at the regional level as a key gateway to international connectivity, travel and trade, and a catalyst for attracting Foreign Direct and other significant investment. In reviewing the Council’s evidence underpinning its housing requirement, principally in the Council’s Economic Forecasts and Housing Needs Assessment (EFHNA)⁴, Peel /DSAL observe that:

- It is not disputed, as stated by the Council in its Local Plan Topic Paper 4: Housing⁵ that job delivery related to the growth of DSA is to an extent factored into the jobs’ projections in the EFHNA. However, based on evidence previously submitted in Peel’s representations⁶, the forecast does not fully capture the impact of the level of job growth assumed at DSA under Policy 7. Policy 7 is predicated on 10,910 jobs being provided during the plan period for the full housing capacity of the two allocations (1,200 dwellings) to be ‘unlocked’. Whilst these are ‘net’ new jobs to the airport, it is recognised that there will be a degree of displacement from elsewhere within the borough, but it is of note that this represents a significant share of the total 27,100 jobs across the borough for the provision of only 1,200 homes;

- It is apparent that other projects and locations will contribute significant levels of additional job growth, alongside what is forecast to be a comparatively strong level of baseline job growth. Indeed, this is recognised in the EFHNA which acknowledges that iPort and DSA “...would deliver the bulk of the 12,800 additional

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⁴ Stantec (June 2018) Economic Forecasts and Housing Needs Assessment [SDEB44]
⁵ DMBC4
⁶ Representations to the Regulation 19 Proposed Submission Version Plan made by Turley on behalf of the Peel Group, Appendix 3 Section 6
jobs that are shown our job-led scenario, over and above the baseline forecast...”. The Council’s more recently published Employment Land Needs Assessment (ELNA, March 2020)\(^8\) observes that iPort is anticipated to deliver 4,500 jobs with approximately 50% of the warehousing space complete as of 2018. It is noted also that jobs associated with Unity (formerly DN7) will also be an important employment generator given the 66 hectares of employment land that it includes. In also considering the range of planned infrastructure investments documented in the ELNA\(^9\), it is reasonable to anticipate that these will elevate the market attractiveness of other identified sites, not least the urban centre and the strategic transport corridors, for investment and therefore job generation alongside the more strategic projects. Indeed, the EFHNA is clear to caveat in this context that: “It is possible that there will be considerable demand for strategic warehousing over and above the scenario, because this demand is footloose...”\(^10\);

- The 1.0% growth job forecast presented in the EFHNA whilst projecting growth in the order of 6,700 jobs in the land transport, storage and post sector, projects only 100 additional jobs in the air transport sector by 2032. Whilst the EFHNA notes that much of the operation of DSA is classified as land transport, rather than air transport, further analysis reveals that a significant proportion (74%) of jobs of this broad sector in Doncaster are warehousing, road freight and land transportation. Projects such as iPort and Unity are evidently oriented towards these sectors but anticipated job growth at DSA covers a much broader range of employment activity across a wider range of sectors. As such, a significant proportion of the jobs forecast through an expanded DSA are not captured in the forecast underpinning the 18,400 homes thereby suggesting that the arising demand for labour associated with the airport related jobs will create additional demand for new homes. This further reinforces the justification for a position whereby the new homes associated with significant growth in jobs at DSA are retained as distinct from the overall supply of homes in the borough; and

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7 PBA (2018) Economic Forecasts and Housing Needs Assessment, paragraph 2.50
8 SDEB8, paragraph 2.54
9 SDEB8 Section 2
10 EFHNA (2018), paragraph 2.52
Finally, it is important to recognise that the DSA Masterplan (DSAM) is not predicated on potential investment in a rail connection to the East Coast Mainline (ECML). If this was delivered this would place 9 million people in the area east of the Pennines and north and east of London within 90 minutes travel time of the DSA terminal. The Council confirms in its Topic Paper 4: Housing with regard to this infrastructure investment that it is: “...starting to gain momentum...and could be operational as early as 2024, but is not yet funded...”\(^\text{11}\). It is reasonable to assume that this enhanced accessibility would further accelerate and dramatically increase economic growth and development around the airport, to levels even greater than those envisaged under Policy 7. Indeed, the DLP recognises this is one of the scenarios that may result in a Local Plan review\(^\text{12}\).

2.6 In the context of the above it is both justified and appropriate for the Council to identify the potential for homes to be provided through the allocated sites at DSA as separate to its housing trajectory and planned supply to meet the 18,400 homes requirement.

**Policy 2 part 5: if a five year supply cannot be demonstrated**

Q5.12. Is the approach set out in policy 2 part 5 to allowing development adjacent to the Development Limits of the Main Urban Area, Main Towns, and Service Towns and Villages if a five year borough-wide supply of housing land cannot be demonstrated justified and consistent with national policy?

2.7 Criterion 5) of Policy 2 sets out the approach to be taken by the Council in the event that it there is a shortfall in the 5-year housing land supply (5-YHLS). It sets out the circumstances in which proposals to develop land for housing in the Countryside around its Level 1-3 settlements will be considered. Whilst the policy seeks to ensure that sustainable housing development is delivered in appropriate locations in the event of a 5-YHLS shortfall, the effect of the policy will inevitably be to enable the delivery of unplanned, sporadically located and speculative residential developments across the majority of its towns and villages. Such developments are (unlike the location of proposed housing at DSA as an integral element of a sustainable, mixed use proposition)

\^\text{11} \text{DMBC4, paragraph 4.8.3}
\^\text{12} \text{Paragraph 1.11, Doncaster Local Plan Submission Version}
as yet unidentified and unidentifiable, and the approach will not therefore be effective at delivering development according to the spatial strategy established in the DLP.

2.8 The DSA Masterplan\textsuperscript{13} articulates that the development therein is a significant, well planned, mixed-use sustainable growth opportunity and has the potential to deliver up to 3,000 dwellings across sites 940 E2 and E3. There is also an additional site on the east side of Gate House Lane, which could be identified as an additional residential development opportunity at DSA (see Peel’s / DSAL’s response to Matter 10). DSA therefore has sufficient capacity to deliver further homes over and above the 1,200 units already identified in the DLP (as currently drafted).

2.9 Peel / DSAL have set out that DSA should be recognised within the overall settlement hierarchy and spatial strategy presented by the DLP in policies 2 and 3 (see Peel’s / DSAL’s Statement in respect of Matter 3). Mindful of the above, Peel / DSAL also consider that Criterion 5 of Policy 2 should be modified to trigger further housing delivery at the DSA allocations in the event of and to help address a 5-YHLS shortfall, ahead of any sporadic, unplanned and likely less sustainable incursion into the open Countryside. A suggested modification to Criterion 5 of Policy 2 in this regard is provided at Appendix 1. This modification would make the policy effective at:

(a) directing housing towards the allocated residential development land at DSA in the first instance and ahead of speculative development, including in the Countryside, elsewhere in the Borough; and in doing so

(b) protecting the settlement hierarchy and spatial strategy established in the DLP, by guarding against the unplanned and sporadic growth of various towns and villages and related incursions into the Countryside. In doing so it would maintain the integrity of the plan-led approach favoured by – and consistent with – national planning policy\textsuperscript{14}.

2.10 It is acknowledged that enabling residential development at DSA to come forward early in the event of a 5-YHLS shortfall would depart from the “policy link” set out in Criterion F) of Policy 7. However, any adverse land use planning impacts would be limited if any (in the light of the absence of a 5YHLS) considering:

- DSA is evidently an economic-led growth opportunity. The delivery of some phases of housing earlier than envisaged would not preclude or stall the delivery

\textsuperscript{13} DSA Masterplan 2018-2037, Draft Consultation Report, March 2018
\textsuperscript{14} NPPF, paragraph 15.
of employment floorspace, given that this is itself the key driver of the project. Rather, it would simply enable a larger potential labour force to be ‘pooled’ in close proximity to the planned delivery of employment floorspace at the Airport. This itself could further enhance the economic attractiveness of the Airport and the surrounding planned commercial developments thereby incentivising business investment, potentially boosting its potential success as a driver of future growth;

- It would not alter the masterplan for the project, such that the planned co-location of and relationship between job and housing growth will still be achieved, albeit via a different approach to phasing;

- This is (in effect) simply a change to the timing of housing provision. It would also be consistent with the “policy link” being out of date as a timing/phasing provision as a result of the absence of a SYHLS and the operation of the tilted balance (see NPPF 11); and

- As discussed in response to Q5.3, the evidence base already identifies that a higher level of housing delivery than planned for by the DLP may be necessary to support the full amount of job growth planned at DSA.

2.11 It is therefore considered that the modification of Policy 2 to enable DSA to play a role in addressing a 5-YHLS shortfall (see Appendix 1) would be justified, positively prepared and consistent with national planning policy.
Appendix 1: Suggested modification to Policy 2, Criterion 5

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

“Residential development will also be supported:

(1) in the Countryside if adjacent to a Development Limit of a settlement in levels 1-3 above, where:

A) it is consistent with the role and service function of the settlement in the settlement hierarchy set out above;

B) the site is well related to the existing built form of the settlement and would represent a logical extension to the built up area or is of a scale and nature that is in keeping with the core shape, form and size of the settlement;

C) it will not cause significant adverse harm to a settlement’s character, setting and appearance (including partial or total coalescence with another settlement) or to the intrinsic character of the surrounding countryside;

D) it accords with other policies in the Local Plan; and

E) a five year borough-wide supply of housing land cannot be demonstrated and the development would make a significant positive contribution to housing land supply.

and

(2) at Doncaster Sheffield Airport, within the defined area established by Criterion E of Policy 7 and in advance of the mechanism set out at Criterion F of that policy, where:

A) a five year borough-wide supply of housing land cannot be demonstrated and the development would make a significant positive contribution to housing land supply;

B) it is informed by a comprehensive airport area-wide masterplanning exercise, as required by Criterion J) of Policy 7; and

C) it accords with other policies in the Local Plan.”

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