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Our ref: General/40b – Planning Conformity/Final Response/Doncaster 189 dwellings Mexborough Jul 07

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Elaine Ward
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Dear Elaine

Application reference: 07/01996/FULA

Erection of 189 dwellings with associated remedial work including importation of inert fill materials on approximately 5.13 ha of land at Mexborough Power Station, Doncaster Road, Mexborough, South Yorkshire.

Thank you for consulting the Assembly on the above. I am pleased to forward the following officer comments to you, based on the current and draft RSS.

The Assembly, as the Regional Planning Body, has been asked to comment on this development as its nature and location mean that it could have an effect on the implementation of the Regional Spatial Strategy (RSS). The current RSS for Yorkshire and Humber (based on the Selective Review of RPG12) was issued by the Secretary of State in December 2004. The RSS has the status of a Development Plan Document and forms part of the framework for decisions taken under section 38 of the Planning and Compulsory Purchase Act (2004), which means that decisions on all applications have to be taken in accordance with the Development Plan unless other material considerations indicate otherwise.

The Planning and Compulsory Purchase Act (2004) and Circular 08/2005 make it clear that a draft RSS submitted to the Secretary of State is a relevant regional policy against which strategic applications can be considered. This Assembly response therefore also highlights relevant issues that arise from the Yorkshire and Humber Plan (draft RSS) December 2005 – the RSS submitted to the Secretary of State.

The Panel Report of the Examination in Public of the Yorkshire and Humber Plan has now been published (May 2007). This contains recommendations to Government that may or may not be reflected in the Proposed Changes to the Plan that are due to be published for consultation in the summer. The Panel Report backs the Plan's overall approach and strategy. It also includes recommendations for changes or additions to policies. Any points from the Panel Report that are particularly relevant to the Assembly's comments on this application are noted in this response. The Yorkshire and Humber Plan should be published in early 2008.

The proposed development does raise a number of issues in relation to the implementation of the RSS that need to be considered. The most significant of these are in relation to the proposed scale, nature and location of the development.

Location

Policies in the current RSS (December 2004) seek to focus development on the region's town and city centres, reduce the need to travel, ensure that development is accessible by a range of transport modes and support the renaissance and regeneration of the region's urban centres by promoting high quality developments that reflect the scale and character of the centres to which they relate (see, for example, policies P1, S4, E1, SOC3, T1, T2).

Policy YH8A of Draft RSS specifically states that the majority of new development and redevelopment should be concentrated within Regional and Sub Regional Centres, with sufficient development in both Principal and Local Service Centres to fulfil their respective service roles. Mexborough is identified under Policy YH6 as a Principle Service Centre. Policy YH6 states that Principal Service Centres will be the main local focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities.

The proposed development is on the edge of the urban area of Mexborough, Policies P1 and E4 of current RSS and YH8 of draft RSS provide for an urban-focussed, transport-orientated approach to development. Policies P1 (b) and E4 (a) of current RSS state that, wherever possible, in considering development proposals preference should be given to land within urban areas.

Policy P1 in current RSS (December 2004) requires a sequential approach to site selection. YH8B of draft RSS (December 2005) also makes it clear that a sequential approach should be taken in determining applications to ensure that developments are either reusing land or buildings within centres, infilling sites within centres or are sites that are well connected on public transport routes and that can maximise accessibility by public transport, walking and cycling. Policy YH8C requires a transport orientated approach to ensure that development makes the best use of transport infrastructure, is focussed along existing or planned public transport corridors and maximises accessibility by public transport, walking and cycling. The Panel Report (May 2007) supports this sequential approach.

The Assembly has not seen any evidence of a sequential approach to site selection by the applicant. The application therefore raises concerns for the implementation of the RSS by virtue of its location in relation to Mexborough.

Accessibility

Ensuring the accessibility of development by non-car modes is a key principle of regional planning policy. The proposal is a high-trip generating development and it is essential that access by non-car modes to the site is a reality. Accessibility criteria are set out in both the current and draft RSS (Table 7.1 and 7.2 of current RSS and Table 16.8 and 16.9 of draft RSS). These tables include acceptable walking and overall journey times for the population that would be travelling to the site. The Panel Report (May 2007) does not suggest changes to these criteria.

It is not clear from the application whether or not an assessment against the accessibility criteria has been carried out.

Flood Risk

The site lies within Flood Risk Zone 3. Current RSS (Policy R2) states that a sequential risk-based approach to planning for flood risk should be taken and that development in high flood risk areas should be avoided. Draft RSS policy (Policy ENV1) states that development in high flood risk areas should be avoided where possible. It should be noted that the Panel Report (May 2007) recommends changes to Policy ENV1 (see pages 104 – 107 and recommendation 6.6) and reinforces the approach set out in draft RSS.

The application therefore raises concerns for the implementation of the RSS in relation to its location in a high flood risk zone.

Loss of Employment Land

The site is allocated for industrial or leisure uses in the Doncaster Unitary Development Plan (adopted in July 1998). In the absence of an up-to-date, published Employment Land Review it is difficult to state whether or not this loss is a problem. The local authority needs to be confident that there will be an appropriate mix of sites for employment uses in Mexborough if this site were to be used for housing. This is essential if it is to play its role as a Principle Service Centre in the district.

Housing Mix

The proposal consists of approximately 189 dwellings. Housing mix will need to be a key consideration in this development. Existing RSS encourages local authorities to set targets for the provision of affordable housing based on housing needs assessments (Policy H4). Draft RSS identifies Doncaster as an area of 'low need' for affordable housing (based on the Regional Housing Strategy, 2005). Policy H3A of the draft RSS suggests that in areas of 'low need' (including Doncaster) up to 29% of homes (on sites of 15 homes or more) need to be affordable. Policy H4 in draft RSS (December 2005) emphasises the need for the current mix of housing in the Region to change so that it better supports the creation of more sustainable communities.

It should be noted that the Panel Report (May 2007) recommends changes to Policy H3 and Policy H4 (see pages 80 – 85 and recommendations 5.9, 5.10 and 5.11).

Given this context, the local authority would be encouraged to consider what would be the appropriate mix of housing in this development if it were minded to approve the application.

Energy

The sustainable use of resources is a key theme of both current and draft RSS. Policy P6 of current RSS encourages new development to maximise energy efficiency and minimise resource demand. Policies in draft RSS build on this and state that at least 10% of the energy to be used in sizeable new development should come from on-site renewable energy sources. The Panel Report (May 2007) recommends that this policy should be applied to developments of 10 houses or more (see pages 102 – 103 and recommendation 6.5).

Therefore if the local authority were to approve the application, this requirement should be stated.

The Assembly has concerns about the application on the basis of its location both in relation to Mexborough and being in a high flood risk area. If the local authority were to approve the application:

- It should be supported by evidence of a sequential approach to site selection.
- It would need to be confident that an appropriate mix of employment sites remained in Mexborough, in order for it to fulfil its role as a Principle Service Centre.
- The housing mix should reflect a local needs assessment and the need for an appropriate housing mix.
- There should be a requirement for a least 10% of the energy to be used to come from on-site renewable energy sources.
- It would need to ensure that there is adequate public transport provision and provision for walking and cycling to meet the accessibility criteria of current and draft RSS.
- It would need to be confident that adequate flood alleviation measures were in place.

If you have any queries about this response, please do not hesitate to contact me.

Yours sincerely



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