



Our Ref: General 40b – Planning Conformity/final responses/Doncaster, 750 Homes,
Auckley, Nov 09

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Dear John

Planning Application Number: 09/02048/OUTM

Outline planning application for erection of 750 homes, roads, footpaths and cycle routes, carparking, landscape, open areas and play facilities on approx. 18.6ha of land (being resubmission of application 08/03481/OUTM, withdrawn on 10.02.09) at Land Off Hurst Lane Adjoining Airport Hayfield Lane Auckley Doncaster.

The Regional Planning Body (RPB) submitted a response to this application on 21 October 2009 which was the same response as that submitted to the previous application. At that stage we had not had an opportunity to consider the additional information that the applicant had made available. Notwithstanding a lack of agreement to formally extend the consultation period for this current application, we thought it would be helpful to submit a further response that makes it clear that the additional information supplied had been considered. This response therefore supersedes the one given on 21 Oct 2009.

The RPB is grateful for the opportunity to comment on this proposed development. The RPB 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 - The Yorkshire and Humber Plan was issued by the Secretary of State in May 2008. 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.

Previous Comments

The Regional Planning Body (RPB) and the Regional Development Agency (RDA) both submitted comments on the previous proposal. Both raised serious concerns over the proposed development. The RPB in its previous comments felt that the scale of this development is inappropriate for Auckley and should be directed towards the Sub Regional Town of Doncaster or Principal Towns in the District such as Mexborough or Thorne. The RDA raised concerns that the proposed development could potentially undermine the renaissance objectives outlined within the Regional Economic Strategy (RES).

Airport Master Plan

Earlier this year RHADS prepared a draft Master Plan for the Airport for consultation. This included the provision for significant residential development. In its response in March 2009, the Assembly raised concerns in regards to the provision of residential development, based on the objection to the previous planning application that had been raised. The response to the Master Plan consultation made it clear that when the important economic role of the airport was discussed (and supported by the Regional Planning Board) during the development of RSS, it was never anticipated that large-scale housing would form part of the longer-term development of the asset.

In its response to the draft Master Plan, Doncaster MBC also raised concerns about the proposed level of housing at the Airport. The Council felt that the employment benefits of the Airport should be spread around the Borough and not focussed on the Airport and that such a focus on housing would not help to fulfil the objectives of the Airport's growth as benefiting the renaissance of the Borough more widely. They pointed out that the emerging LDF, Unitary Development Plan and Regional Spatial Strategy do not support the housing development around the airport at the scale proposed.

Accompanying Information

The applicant has produced a report entitled 'Delivering Housing and Economic Growth at Robin Hood Airport Doncaster Sheffield (RHADS)' to address specific concerns that were raised by Doncaster MBC, Yorkshire Forward, the RPB and other consultees in relation to the previous application.

The report makes a case for the development based on the growth of RHADS and the need for housing to be co-located with these job opportunities. It argues that there has been a restrictive interpretation of the RSS and that the RSS is based on a settlement study that did not take into account the growth of RHADS. They state that current low levels of housing delivery point to the need for this site to be developed, that residential futures work for the Northern Way points to the need for the kind of housing proposed and that the development helps the business case for the delivery of the Finningley and Rossington Regeneration Route Scheme (FARRRS).

Regional Planning Body Response

This response focuses on: (i) the scale and location of the proposed development (ii) the role of the Airport and (iii) the delivery of housing and transport. There are other issues that the local planning authority will need to consider if it is minded to approve the application (such as mix of housing types, levels of affordable housing provision and onsite renewable energy generation).

Scale and Location

Policies in RSS (2008) seek to focus development on the region's town and city centres. The Core Approach (Policies YH1-YH9) makes it clear that most new development, and high trip generating uses, should be focussed on Regional Cities and Sub-Regional Cities and Towns and that away from these sufficient development should be permitted in Principal Towns to enable them to fulfil their role as service centres.

These policies are designed to transform the urban centres into 'attractive, cohesive and safe places where people will want to live, work, invest and spend time in' (Policy YH4) and to strengthen their roles as 'accessible and vibrant places' (Policy YH5).

RSS (2008) establishes Doncaster as a Sub-Regional City and identifies Principal Towns in the Doncaster district as Thorne and Mexborough. Policy YH5 allows for further Principal Towns to be identified in particular circumstances ie. where they will support the delivery of the Core Approach; will provide employment, community facilities and services for local and supporting populations; and will have good accessibility by public transport to Regional Cities and Sub-Regional Cities and Towns.

Policy YH6 states that outside of Principal Towns, rural areas should focus on development that meets locally generated housing needs. Given the current population of Auckley (just under 5,500 in 2005), it is likely that a development of this scale is far greater than that needed to meet local need in Auckley.

Further Principal Towns and identification of local service centres and villages as part of the Borough's settlement network will come through the preparation of the LDF. In Doncaster's emerging LDF and settlement network, Auckley would not be proposed as a Principal Town but would continue to fulfil its current role.

The RSS Core Approach and the policies that set out a broad spatial strategy and settlement network were based on a number of studies, other related strategy work and consultations. These included the Regional Settlement Study (2004), the South Yorkshire Settlement Study (2005) and the South Yorkshire Spatial Vision and Strategy. The Regional Settlement Study identified 19 local service centres in the Doncaster district but Auckley was not one of them. The South Yorkshire Study looked at settlements at a much finer level of detail than the region-wide study and concluded that Auckley was a small village, low order settlement and that 'further change would not benefit the settlement'. The South Yorkshire Spatial Vision and Strategy did not envisage Auckley being a focus for growth. More recent work for the Doncaster LDF has reinforced these conclusions.

Role of RHADS

The RSS (May 2008) provides a clear policy framework for the development of RHADS and the role that it should play in developing the economy of the Borough and the sub-region. Its growth was anticipated by the RSS, with policies that state that its importance to the South Yorkshire economy should be reflected, that transport policies should provide for operational and related development and that investment priorities should allow for operational and related development at the Airport and development in appropriate locations arising from the airport's importance to the wider South Yorkshire economy (Policy SY1 and paragraph 4.9).

The growth of the Airport was, and is still seen as, a catalyst for economic investment across the Borough and the wider South Yorkshire area. It was not anticipated as being, and has not been planned as, the basis for the growth of a 'new town' that would result from the scale of residential development as proposed by the applicant.

Delivery of Housing and Transport

This proposal is for 750 dwellings. The RSS (2008) sets Doncaster an average annual net completion rate of 1230 dwellings between 2008-2026. The proposal would therefore make a significant contribution to housing delivery in the District. Under current market conditions, housing completion rates have fallen dramatically (an estimated drop of between 25 and 50% across the region compared to figures for 2007-08), placing increased pressure on future housing trajectories to meet housing need across the region including the Doncaster district.

However, as has been outlined above, a single housing development of this scale and in this location would not help to implement the overall development strategy for the area. Current policy does not support the growth of residential development at the Airport on this scale. Support for the development of RHADS was not predicated on such residential development on the site and the delivery of the spatial strategy and vision for the District should not be distracted by a proposal for this scale of residential development in this location. In current market conditions, local authorities need to focus on how they can bring forward sites whose development would meet a number of objectives, including the regeneration of brownfield sites.

The applicant makes the case that the development will help finance the Finningley and Rossington Regeneration Route Scheme (FARRRS). This Scheme will be important to the future regeneration of the wider area and is supported by the emerging LDF. The applicant also makes the case that the site is a sustainable location for housing given its relatively high levels of accessibility by public transport. Indeed such levels of public transport accessibility were considered a vital part of the growth of RHADS and its associated business parks to ensure their accessibility from residential areas around the Borough rather than as providing a case for housing to be developed on the site itself.

Mix of Housing and Affordable Housing Delivery

The application states that a mix of housing will be provided within the development. There will be a mix of house types of 2-3 storeys in height, including town houses and traditional 2 storey family homes. Policy H5 in RSS (2008) 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. The Policy recommends that plans, strategies, investment decisions and programmes should ensure the provision of homes for a mix that reflects the needs of the area, including homes for families with children, single persons, and older persons, to create sustainable communities. Should the local authority decide to accept housing development on this site it will be important ensure that there is an appropriate housing mix.

The applicant states that there will be 195 affordable homes (which equates to 26%) provided within the development. Policy H4A of RSS (2008) states that the region needs to increase its provision of affordable housing. Plans, strategies, programmes and investment decisions should ensure the provision of affordable housing to address the needs of local communities. RSS (2008) identifies South Yorkshire as an area of 'lower need' for affordable housing (based on the Regional Housing Strategy, 2005).

Policy H4B of the RSS suggests that in areas of 'lower need' (including Doncaster) up to 30% of homes need to be affordable. Again should the local authority decide to accept housing development, this site provides a significant opportunity to deliver much needed affordable homes.

Renewable Energy

The sustainable use of resources is a key theme in RSS (2008). Policy ENV5 states that in advance of local targets being set in DPDs, new developments of more than 10 dwellings should secure at least 10% of their energy from decentralised and renewable or low carbon sources. It will be important for such issues to be agreed if planning permission is granted for housing of this scale on this site.

Conclusion

Given the issues set out above, it is concluded that: the scale and location of this development would be contrary to the Core Approach, Spatial Strategy and sub-regional policies of the RSS. The RPB is of the opinion that if it were permitted it would undermine a key locational principle of the RSS and does not reflect the role of RHADS as supported in the RSS. Consequently there is a significant risk of harm to the implementation of the Regional Spatial Strategy. As a result, the RPB objects to this development.

If you have any queries about these points, please do not hesitate to contact Jenny Poxon on 01924 331601.



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Please note: from 1 April 2009 officers supporting the work of the Joint Regional Board, the new Regional Planning Body, will work in LGYH; please amend your contact databases accordingly.