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Our ref: 40b – Planning Conformity/Final Responses/Doncaster, Mixed Use Development, Askern, Doncaster May 08

16 May 2008

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Dear Diane

Planning Application Number: 08/01077/OUTM

Outline application for mixed use redevelopment of land at and to the south of Askern Saw Mill comprising the erection of up to 220 dwellings, up to 310 sqm of Class A4 use, up to 5670 sqm of Class B1, up to 11520 sqm of Class B2 use, 4460 sqm of Class B8 use and setting out of Public Open Space on approx 15.17ha of land at Askern, Doncaster

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.

Please note that the Secretary of State's Proposed Changes to Draft RSS have now been published (September 2007). Government guidance (paragraph 4.19 in PPS12) states: "Where the regional spatial strategy...has been through an Examination in Public, and the proposed changes have been published, considerable weight may be attached to that strategy because of the strong possibility that it will be published in that form by the Secretary of State".

Assembly responses to consultations on strategic applications will therefore have to make it clear how the Proposed Changes impact on the policies quoted and to point out to local authorities that 'considerable weight' will need to be attached to them by the decision-making body and by Inspectors at Examinations of DPDs and application Inquiries. At the same time, it should be noted that the Assembly itself has made comments on the Proposed Changes and that the final version of the new RSS is expected in spring 2008.

Both the existing and draft regional spatial strategies aim to achieve a more sustainable pattern and form of development, investment and activity across the region, putting a greater emphasis on matching needs across the region with opportunities and managing the environment as a key resource. There is a particular emphasis on achieving the regeneration and renaissance of the region's city and town centres by making them the focus for housing, employment, shopping, leisure, education, health and cultural activities and facilities in the region (for example Policy P1, existing RSS, December 2004 and Policy YH5, Draft RSS, December 2005).

In seeking the implementation of these policies across the region, the Assembly therefore offers the following comments on the proposed mixed use development in Askern in Doncaster.

Regional Policy Context

The proposed development does raise a number of issues for the implementation of RSS that need to be considered, primarily by virtue of its nature, scale and 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).

Policies in draft RSS (December 2005) build on these principles. The Core Approach (Policies YH1 – YH9) makes it clear that most new development, and high trip generating uses, should be focused on Regional and Sub-Regional Centres and that

away from these sufficient development should be permitted in Principal Service Centres to enable them to fulfil their role as service centres (Policy YH8 building on policies YH5, YH6 and YH7 and Policies E2 and T1).

Both current and draft RSS discourage development of Greenfield land, and state that priority should in fact be given to the re-use of Brownfield sites within settlements. Second priority should be given to other suitable infill opportunities, and thirdly, to planned growth areas.

It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) replaces the terms "Regional Centres" with "Regional Cities", "Sub Regional Centres" with "Sub Regional Cities and Towns" and "Principal Service Centres" with "Principal Towns". The Core Approach of draft RSS is not changed by the Proposed Changes.

Location of development

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 YH8A of draft RSS specifically states that the majority of new development 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. Proposed Changes to Draft RSS maintains the overall spirit of these policies but changes the detail of the approach. To that end, Policy YH5 on Regional Cities and Sub Regional Cities and Towns specifies that these should be the prime focus for development and that, in accordance with Policy YH6, Principal Towns should be the main local focus for development. Policy YH7 notes that Local Service Centres should support the needs of people living in the surrounding rural areas and that development should be accessible to them. Policy SY1 A supports the development of Doncaster as a Sub Regional Centre and supports the role of Mexborough and Thorne as Principal Towns.

The Regional Spatial Strategy: Settlement Study identified Askern as Local Service Centre. Policy YH8 of draft RSS (2005) provides for limited development to take place in Local service centres with a focus on meeting local needs for affordable housing and economic diversification.

Policy P1 in current RSS (2004) requires a sequential approach to site selection. YH8B of draft RSS (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. It is not clear that a sequential approach to alternative site selection has been carried out.

It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) recommends changes to Policy YH8. These do not alter the Core Approach or change the site selection/accessibility orientated approach set out above.

Scale of Development

The application states that the proposed development will provide approximately 220 dwellings. Draft RSS (December 2005) sets an average annual net completion rate of 855 dwellings for Doncaster between 2004-2011 and 2011-2016 and 1080 dwellings between 2011-2016. The Secretary of State's Proposed Changes to Draft RSS (2007) sets Doncaster a target of 855 average annual net additions of 855 dwellings between 2004-08 and 1230 dwellings between 2008-2026. Therefore this proposal would make a significant contribution to delivering housing in the Doncaster district. However the Assembly would expect this scale of development to be directed towards Doncaster as a Sub Regional Centre or to the Principal Towns of Mexborough and Thorne. Policy YH7 states that Local Service Centres (of which Askern is one) should only allow development that meets locally generated housing need. This scale of housing is clearly much greater than that required to meet local needs in Askern.

The application also states that the proposed development will include up to 5, 670 sqm of B1 Use and 11, 520 sqm of B2 Use. Policy YH7 and YH8 both states that development in Local Service Centres should support economic diversification. Policy E3 of Draft RSS states that local authorities should undertake a rigorous assessment of the amount of employment land that is needed. Proposed Changes to Draft RSS Policy E3B require that the pattern and scale of allocated employment land should be determined by local employment land reviews, which take account of the forecasts and spatial guidelines set out in draft RSS. Table 14.7A in Proposed Changes to Draft RSS suggests the potential annual job growth from 2006 for B1b/c & B2 uses is 780 in Doncaster. Therefore it will be up to the local authority to decide in the context of the local Employment Land Review if this development is of an appropriate scale to support the role of a Local Service Centre.

Accessibility

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. It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) makes no recommendations with regard to these criteria.

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

Car Parking

Policy T2 of the draft RSS states that the maximum parking standards for new developments must be in line with Table 16.5. There is not sufficient detail provided with the application to assess whether this be the case.

It should be noted that the Secretary of State's Proposed Changes to draft RSS (2007) makes no recommendations with regard to these criteria.

Renewable Energy

The sustainable use of resources is a key theme in both current and draft RSS. Policy P6 of current RSS (2004) encourages new development to maximise energy efficiency and minimise resource demand. Policy ENV5 of draft RSS (2005) requires at least 10% of energy to be used in sizable new development is to come from on-site renewable energy sources. The Secretary of State's Proposed Changes to draft RSS (2007) removes this threshold, recommending that local authorities set their own proportions of the amount of energy to come from local renewable sources. Doncaster Metropolitan Borough Council should ensure that renewable energy is promoted and secured in the proposed development.

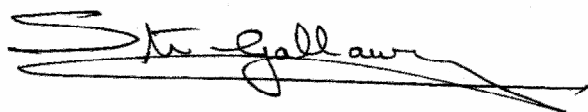
Conclusion

Given the issues set out above, the Assembly offers the following comments that:

- The foregoing analysis shows that the nature and scale of this development is inappropriate for a Local Service Centre. Should it be permitted it will undermine a key locational principle of the RSS. Consequently there is a significant risk of harm to the Regional Spatial Strategy. In these circumstances the Assembly objects to this development.

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

Yours sincerely



Stephen Galloway
Chair, Regional Planning Board
Yorkshire and Humber Assembly