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Our Ref: CM/EK/DoncasterLocalDevelopmentFrameworkCoreStrategy: Preferred Options

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Dear Jeremy

### **Doncaster Local Development Framework Core Strategy: Preferred Options**

I refer to our telephone conversation of 9 March 2006 in relation to the above. As discussed, the Assembly has a number of officer comments on the emerging strategy work on the Doncaster LDF.

In summary, the Assembly welcomes the broad approach of the Strategy, which sets out a compelling vision of Doncaster's future based on a prosperous, inclusive economy. However, there are concerns that elements of the Strategy could lead to dispersed patterns of development and declining demand elsewhere. This runs counter to the Regional Spatial Strategy and the Vision for South Yorkshire as agreed by leaders of the four authorities in November 2004. The LDF approach could undermine their delivery, in particular the revitalisation of urban areas across South Yorkshire.

In order for the Core Strategy to more clearly reflect the regional spatial strategy set out in both current RSS (December 2004) and Draft RSS (Yorkshire and Humber Plan - December 2005), it is suggested that the following issues should be taken into account in the next stages of the Strategy's development:

#### **General Issue**

The **definition of sustainability** used in the document is inconsistent. Uses of the term seem to relate to either sustainability in the conventional sense (i.e. the best balance between long-term social, environmental and economic interests) or it relates to "economic sustainability" (i.e. the extent to which the market will support a given activity in a particular location over time). This is potentially confusing, and makes it difficult to unpick the relationship between draft policy and the RSS.

## **Specific thematic issues**

**Theme 1 "Sustainable Settlements"** needs to be examined within the context of messages on settlement hierarchy of current RSS (Dec 2004) and those emerging from draft RSS (Dec 2005). In addition to specific matters arising from the guidance on the South Yorkshire sub area within the emerging RSS, work will be needed to make sure that the proposals are in general accordance with the "Core Approach" of emerging RSS. In this regard policies SY1 (particularly the specific settlement hierarchy) and YH1-8 are most significant.

Specifically, Draft RSS Policy SY1 sets out Doncaster as a "Sub regional centre" and Mexborough and Thorne as "Main Towns". These are given special emphasis as the location for development to strengthen their important roles. Policy CS-S6 of the LDF gives "Principal Outlying Settlements" status to Mexborough and Thorne, but also includes Aldwick-le-Street, Armthorp, Askern and Conisborough. Giving these settlements this status may put at risk the RSS strategy to focus development upon, and revitalise the sub regional centre and main towns.

**Theme 2 "Population & Housing"** sets out a sequential approach that implies the possibility of significant growth in smaller settlements. This does not accord with P1 and H2 of approved RSS, nor the emerging RSS (discussed above) both of which require a focus of development on fewer and larger settlements to achieve a more broadly sustainable pattern of development and to foster regeneration/inclusion. The policy justification in the LDF refers to commitments at Bentley, Brodsworth, Cadeby and Askern. If these are not extant permissions they should be reviewed in accordance with Policy P3 of current RSS.

In terms of accommodation for travellers, there will need to be a reflection of the regional level work that has just been commissioned by the Assembly and GOYH.

Elements of **Theme 3 "Economy and Employment"** are potentially out of alignment with current RSS, draft RSS and the agreed South Yorkshire Spatial Vision. Paragraph three on page 36 of the LDF sets the entire tone for this section of the document. While the message is obviously intended to be a statement of promotion/confidence, it is also the justification for the approach to employment sites which flows throughout the document. As such there should be a review of the broad approach to establish stronger coherence with RSS and the South Yorkshire Spatial Vision.

A key concern is the spatial approach towards the retention of extant, draft and proposed employment allocations. These are focussed on areas such as the M18 and A19 corridors. Site locational criteria appear to be driven less by strategic concerns expressed in the current RSS sequential test (Policy P1), the Core Approach & Sub Area Guidance of Draft RSS (Policy YH6 and SY1) and more by what is perceived to be attractive to the market. This purely market-led approach was used to justify the original Objective One SEZ designations. However, the lack of a coherent spatial strategy underpinning the SEZs was one of the prime drivers for work on the South Yorkshire Spatial Vision.

The Core Strategy Preferred Options document appears to return to an approach more consistent with the original SEZ concept. Current and Draft RSS are in keeping with the South Yorkshire

Vision in that they do not support focussing development outside the main urban areas and key settlements.

It is acknowledged that site-specific proposals will eventually emerge via an employment DPD. However, loose policy wording like "proximate to settlements" could lead to unsustainable, dispersed patterns of development and declining demand elsewhere in the sub region.

While there are some welcome messages about the approach to employment land, including provision at/near Robin Hood Airport, these are not transparently translated upwards into policy. Draft Policy CS-E2 of the Core Strategy sets out priorities for new strategic employment land. It's primarily based around the M18 corridor, and "attractive to the market" is the first consideration. The agreed South Yorkshire Vision seeks a fundamental transformation of the economy and the urban environment. This requires that the spatial, historic and structural economic problems of South Yorkshire be addressed. Some of the strategic choices needed to underpin this transformation will be difficult, but we believe that decisions should be made strategically, and that the South Yorkshire economy is now strong enough to deal with these choices.

It is therefore suggested that Policy CS-E2 be re-examined in the context of Draft RSS Policy E3 "The Supply of land and premises for economic development", including specific messages about the role of the Robin Hood Airport Masterplanning exercise.

**Theme 4 "Accessibility & Transport"** is heavily predicated upon a series of significant transport investments. Elements of the strategy look unaffordable in the context of current regional funding allocations and the document does not discuss an alternative, more affordable, programme of transport improvements. There should be an element of low cost measures, such as making best use of existing assets.

Some of the investment timescales seem optimistic about the change that can be achieved by 2010. The 2021 Vision proposes a large number of expensive transport projects. If Regional Funding Allocations continue on the present trajectory this programme will probably not be achieved. While the transport aspirations are not unreasonable for the opportunities/problems that Doncaster faces, DfT funding is unlikely to make it all achievable. A key question must be - if these major investments are not forthcoming, are the aspirations of the strategy robust and realistic?

Policy CS-A2 and CS-A3 may understate the problems which the Highways Agency consider that FARRRS may cause on the M18. While Policy CS-A5 in part addresses this, there should still be a recognition that the M18 improvements will need to come out of the same investment pot as the other regional-scale transport proposals.

Policy CS-A7 should refer to the parking standards in Draft RSS. They are essentially unchanged from those in current RSS. Consideration should be given to further supporting the RSS policies intended to achieve modal shift.

The Habitats Directive is now a significant issue. ODPM has written to the Assembly and to all local authorities indicating that all land use plans are subject to "Appropriate Assessment" of their implications for European sites. The SA/SEA report for draft RSS identified the Thorne and Hatfield Moors as an area where such an Assessment should be undertaken and the Assembly is now undertaking steps to address this. Given that a similar requirement may also apply in relation to the Doncaster LDF it would be useful to have further discussions about this matter.

If you have any queries about any of these points, please do not hesitate to contact Rob Murfin on 01924 331592.

Yours sincerely

A handwritten signature in black ink that reads "Chris Martin". The signature is written in a cursive style with a horizontal line underneath the name.

Chris Martin  
Director of Planning and Transport