Dear Sir/Madam

Development Management
Pre-Application Enquiry Response

Thank you for taking advantage of our Pre-Application Enquiry Service. We aim to give you some initial feedback on your development proposal, highlight any major concerns that Doncaster Metropolitan Borough Council may have and point you towards further details that may be required before submitting a planning application in the future (if applicable).

From our understanding the details of your enquiry were as follows:

**Location**  
Land South Of West Moor Farm  West Moor Lane  Armthorpe  Doncaster  DN3 3EA

**Proposal**  
Proposed mixed use employment site

Advice relating to specific issues surrounding your enquiry will be stored for future reference and are as follows

The enquiry seeks advice over a proposal to develop land to the north of West Moor Park to provide an employment site on approximately 80ha of existing agricultural land. It is envisaged that the site would provide a mix of B8 (70%) and B2 (30%), as well as proposing a solar farm to the west of West Moor Lane to service the development. 2 layout options have been provided for consideration, one showing 3 units, the other 5.

The Doncaster Council Core Strategy 2011-2028 is the adopted local policy document, replacing the Unitary Development Plan except for certain saved policies. In terms of land allocations, the inset maps within the UDP are still applicable until the formal adoption of the forthcoming Local Plan.

The site lies within an area identified as Countryside Policy Area as defined within the 1998 Unitary Development Plan inset maps, whereby saved Policies ENV2 and ENV4 are applicable. These policies set out the reasons for the designation of the Countryside Policy Areas, as well as setting out which forms of development are normally acceptable in such locations.
Core Strategy Policy CS3 (Countryside) makes clear that the East of the borough will continue to be protected through Countryside Protection Policy Area, however it accepts that land currently designated as countryside policy area in the UDP may need to be removed to provide the allocations to deliver the Growth and Regeneration Strategy.

Policy CS5 (Employment Strategy) of the Core Strategy includes a phasing policy to limit growth of distribution warehousing to within 5 years of the adoption of the Core Strategy to a maximum of 62ha (including planning permissions) to provide priority to the Inland Port located at Rossington. Policy CS2: Growth and Regeneration Strategy, states that "within the M18/M180 corridors a number of opportunities exist associated with the strategic transport network at the junctions near to Armthorpe and Thorne." This is reiterated in Table 2 of the policy, which sets out the broad located for Employment across the Borough. Distribution warehousing is proposed for the M18 / M180 corridor at junctions close to Armthorpe, Stainforth / Hatfield and/or Thorne and the Strategic Rail Freight Interchange at Rossington.

However, the Core Strategy does not define which sites should be allocated. The site is currently located within the Countryside Policy Area as defined by saved policies within the existing UDP, and is therefore subject to saved UDP policies ENV2 and ENV4. Although the UDP precedes the NPPF, together with the adopted Core Strategy and Joint Waste Plan, the saved UDP policies do remain part of the statutory development plan. Therefore, although the site complies with the broad strategic direction set out by the Core Strategy, it is a still a departure from the development plan.

As you are aware, the authority is currently preparing its Local Plan, and has received numerous representations for land to be allocated for employment uses, including obviously this site. Given the timescales involved with the Local Plan, seeking to submit for examination towards the end of the year, it would be considered that any submission in advance of this would be deemed premature. Should an application be submitted in advance of this, the proposal will be treated as a departure, and arguments considered in the planning balance in the normal way.

Design and visual impact

In terms of design issues and the visual impact upon the surrounding area, whilst the site is within the Countryside Policy Area and is currently agricultural, it is located to the north of the existing West Moor Park employment area, which is characterised by large-scale employment buildings and warehouse sheds, most notably the Ikea warehouse opposite the site.

Policy and guidance

The main relevant design policies include CS14 design and sustainable construction, CS16 valuing the natural environment, CS17 providing green infrastructure. These policies are supplemented by the Council's adopted SPD Development Guidance and requirements which contains detailed guidance for these types of developments in
order to meet the relevant policies. The following sections of the SPD are particularly relevant in developing the proposals, and will be used by the council in the appraisal of any scheme (2.1, 2.24, 4.0, 5.4, 8.2-8.9, 8.11, 8.12). The SPD can be found via the following link:
www.doncaster.gov.uk/spd
Also of consideration is the Armthorpe Neighbourhood Plan, although the site falls just outside the Parish boundary.

Preliminary design review

Landscape and green infrastructure
One of the most important considerations for this form of development is the impact upon the wider landscape character and the quality of the landscape proposals. Therefore the proposals would have to be subject to a robust landscape and visual impact assessment (LVIA), which assess the impact of the development from a number of viewpoints agreed by the Council and which is likely to include a requirement for 3d photo-realistic visualisations from key viewpoints. This needs to consider the cumulative impact of adjacent developments and the proposed mitigation strategy and inform appropriate building heights. It is therefore a key starting point in the design process and should be used to inform the layout (as opposed to retrofitting the LVIA to a pre-determined layout).

In this respect landscape buffering of the development is likely to be a key issue. Both the submitted plans appear to show areas of landscape buffering and open space at the edges of and running through the development, which in principle is positive. It will be important to ensure these strips are generous enough to provide a decent dense visual buffer and offer opportunities for habitat network creation. Likewise the solar farm element may require screening to be determined through the LVIA process. There seems an opportunity, and space available, to create a circuitous GI corridor around the site periphery to afford landscape buffering and GI networks linking into the surrounding areas. This could include a footpath to provide recreational opportunities for workers and the wider community, delivering public health and well-being benefits as well as ecological. It would link into a finer grain network of linear landscape habitats running between the individual plots to create a ‘green grid’. The central part of the site with the SUD’s basin represents a real opportunity to create a distinctive ‘green heart’ to the development. The SPD provides guidance in this respect and suggests for major developments the edge screening strips should be between 10-30m wide. The southern edge of the site along West Moor Link Road is a key edge that should be planted to a similar or better standard than that on the opposite side of the road, as this will link into the Armthorpe Green Wedge further westward.

It is imperative the applicants develop a green infrastructure concept plan to guide the layout of the development and provide a quality green framework in which the new buildings will sit. It is likely to be a market led development do the plots / building sizes shown on the plan will change over time (as different market requirements come along). So it will be important to fix this green framework to a degree as part of any application through an agreed parameters plan.
The parking areas will require good levels of landscaping around them and tree planting along runs of bays to break up expansive areas of tarmac.

Building layout and design

The SPD sets out key design principles for these types of buildings at section 2.1. Some of the proposed units are sited with service yards and parking areas to the front of the buildings which will result in poor enclosure of the principal routes and a lack of activation from the office elements which should benefit from higher design standards and be orientated towards these public streets. Narrow landscape strips to the edges of the plots would reduce the scope to provide enclosure through tree planting. There is an area of land outside the site boundary in the south-east corner which would not be able to be developed if the layouts as shown were developed. The applicants may wish to consider retaining the potential to access this area in the layout, as future development could possibly take place here if the proposals were approved.

In terms of building design, section 2.1 of the SPD sets out key design principles. The units located closest to the motorway are important to provide a positive architectural impression from the motorway and provide a landmark at the junction. The Ikea warehouse was a missed opportunity in this respect. It is a large, tall, bulky building which is difficult to disguise / screen and therefore could have been celebrated more through a bespoke, memorable and interesting architectural treatment at a key gateway into the town.

Any new development would have to meet the sustainable construction standards of policy CS14. Specifically for major developments this includes BREEAM very good plus 10% of operational energy use from renewables. These requirements are worth considering at the site planning stage as credits for BREEAM relate to the wider layout and context. Further information can be found at: http://www.doncaster.gov.uk/urbandesign

Transportation

The Council's Transportation team have been consulted, and advised that a scheme of this size will require a full transport assessment, to include the following elements;

Traffic counts are to be undertaken to establish baseline transport data and to properly assess the impact of this development.

Once the trip generation and distribution exercise has been undertaken, any junction with an impact of 30 or more (2-way) vehicles in the peak hours is to be capacity assessed.

Committed developments to be taken into account.

The most recent 5 years collision data to be reviewed.

Any future year assessment to be +10 years.
Lorry parking facilities to be provided on site to prevent HGVs parking/waiting on local roads.

Cycle parking to be provided.

Due to the sites proximity to the M18 Junction 4, Highways England are to be consulted.

It is advised that the applicant discuss and agree the scope of the Transport Assessment with the Councils' Transportation Unit prior to undertaking the Assessment in order to avoid any abortive or unnecessary work. The Travel Plan should include Monitoring and a Bond as per DMBC requirements (see below).

Travel Plan

Travel Plan Co-ordinator to be named and in post at least 3 months prior to first occupation.

Targets

The DMBC requirement is for a 10% reduction in single occupancy car journeys to be demonstrated over a 5 year period.

Travel Plan Monitoring

The DMBC requirement for monitoring (as per section 3 of the Returnable Transport Mitigation Bond Guidance) is twice yearly counts at each vehicular entrance point of the site, annually if Automatic Traffic Count (ATC), undertaken in a neutral month, by an independent consultant for a period of 5 years. The parameters of any monitoring need to be agreed with DMBC prior to being undertaken.

Monitoring can be undertaken by DMBC at a cost of £5,000 per entrance/exit point, this will be secured by the Section 106 agreement.

Travel Plan Bond

A Bond is required to mitigate any traffic in the event that targets are not met. The purpose of the TP Bond is to ensure that the targets within the Travel Plan towards sustainable travel (bus, walk, cycle etc.) can be met, and if not met the Council would step in with sustainable measures using the Bond. The Council needs to be assured that the Travel Plan is effective and has reasonable targets that can be met.

The formula for calculating the bond is as follows:–

No. of dwellings/No. of employees x the current cost of a 28 day SY Connect+ ticket (currently £111.40) x 1.1
Full Travel Plans to be submitted within 3 months of full occupation for each individual unit. Employment only.

EV Charging

Prior to the occupation of the development hereby approved, details of electric vehicle charging provision shall be submitted to and approved in writing by the local planning authority. Installation shall comply with current guidance/advice. The first dwelling/development shall not be occupied until the approved connection has been installed and is operational and shall be retained for the lifetime of the development. The development shall be carried out in accordance with the approved details.

REASON To contribute towards a reduction in emissions in accordance with air quality objectives and providing sustainable travel choice in accordance with policies CS9 and CS18 of the Doncaster Council Core Strategy.

Developer Contribution

Core Strategy Policy CS9 – Providing Travel Choice details the requirements for contributions towards major highway schemes which the Council is progressing for implementation through the Sheffield City Region Investment Fund and proposals will be supported which improve the efficiency of, and key connections to, the internal road, strategic road and motorway networks. The Council has assessed the cumulative impact of all development sites (AECOM Report) and developed a methodology for determining the level of funding that is required from each site. A contribution will be sought towards the West Moor Link Improvement Scheme using this methodology.

Public Rights of Way

West Moor Lane is a public bridleway for use by the public on foot, horse or cycle. It appears from the plan that vehicle access to the proposed development is along the public bridleway, therefore my first concern is to question if the applicant has a private vehicle access to the site and does that right extend to inviting others. I doubt the industrial units will be able to function without vehicle access, therefore my second concern is that if the applicant can prove there is a private vehicle access that he may extend to users of the proposed units, there will be an issue with the safety of bridleway users. There is already a conflict between bridleway users and vehicles accessing West Moor Farm, therefore should the right to take vehicles along the bridleway be demonstrated I would request that the vehicle access and the bridleway access is segregated in the interest of safety.

Air Quality

Air quality screening will be required. The assessment should be carried out (as a minimum) in line with the Doncaster Council Air Quality Technical Planning Guidance http://www.doncaster.gov.uk/services/environmental/air-quality-reports-available-to-the-public. Mitigation in the form of building design shall be incorporated to reduce the
impacts on future residents. The Pollution Control section will have regard to Local Air Quality Management Technical Guidance LAQM.TG(16) in reviewing any assessment.

Dust from demolition and construction should be assessed using the latest IAQM guidance (2014), to assess any potential for particulate matter objectives (Air Quality Regulations 2015) to be exceeded.

The reason for this is to ensure the development does not render parts of the Action Plan for Air Quality Management Area unworkable and to protect human health (CS18).

**Ecology and Trees / Hedgerows**

An application on this site would need to be supported by an ecological impact assessment in line with the guidelines by CIEEM and BS42020. This should map the habitats present on site, be informed by a data search from the Local Records Centre and include the relevant protected species surveys. With features such as hedgerows, ditches and farmland surveys such as bats, water vole, badger, breeding/wintering bird surveys may be of particular relevance but following the initial site visit then surveys for any protected species with the potential to be using the site should be carried out.

In line with the NPPF a development on this site should demonstrate how it will deliver a net gain in biodiversity. The habitats present on site should be assessed with the Defra Biodiversity Offsetting Metric. Habitat losses and gains can then be quantified in order to demonstrate a net gain is being delivered by the development proposal.

Whilst largely open, arable land, there are remnant hedgerows that date back as far as the 1774 Armthorpe Enclosure Award (the southern boundary). The smaller field at the SW apex of the site is bordered by hedgerows that were present at the time of the 1843 Hatfield Thorne tithe map, as are the longer two roughly running N-S in the eastern part of the site. The remaining hedgerow remnants derive from the Hatfield Thorne Fishlake Stainforth & Sykehouse Enclose Award of 1825.
Appropriate arboricultural and hedgerow surveys will be required, the findings of which should inform the design process.

**Drainage / Flood Risk**

The information below is required when an application is made.

The development hereby if granted shall not be begun until details of the foul, surface water and land drainage systems and all related works necessary to drain the site have been submitted to and approved by the Local Planning Authority. These works shall be carried out concurrently with the development and the drainage system shall be operating to the satisfaction of the Local Planning Authority prior to the occupation of the development.

REASON: To ensure that the site is connected to suitable drainage systems and to ensure that full details thereof are approved by the Local Planning Authority before any works begin.

1. Please note that the site sits within Flood Zone 3a, A Flood Risk Assessment (FRA) should be provided for the proposed development site, in accordance with the NPPF (including Technical guidance and DMBC Supplementary Planning Guidance Document). Where the site is at risk of flooding (Fluvial and Pluvial), details of place of refuge/evacuation should be considered and also sign up to the Environment Agency Flood Warning Service.
2. As the site falls within our IOA (Isle of Axholme) Residual Flood Zone there are regulations regarding finished floor levels, a potential floor level of up to 4.1m AOD should be used for planning purposes with finished floor levels 300 mm above this level (i.e. at 4.4 m AOD). Due to residual flood risk, finished floor levels should aim to be 4.4 m AOD as a starting point. However, it is acknowledged that viability issues and existing AOD may result in lower finished floor levels which will need to be confirmed through a site-specific flood risk assessment and subject to agreement with DMBC and the EA. For any further information please see our Strategic Flood Risk Assessment at www.doncaster.gov.uk.

3. Records indicate that this area may be susceptible to surface water flooding please see Environment Agency indicative SW Flood Maps. Therefore flood resilience should be duly considered in the design of the new building/s or renovation. Guidance may be found in BRE Digest 532 Parts 1 and 2, 2012 and BRE Good Building Guide 84.

4. The applicant should provide a Flood Evacuation Plan which outlines:

- The flood warning procedure.
- A safe point of extraction.
- How users can safely evacuate the site upon receipt of a flood warning.
- The areas of responsibility for those participating in the plan.
- The procedures for implementing the Plan.
- How users will be made aware of the flood risk.
- How users will be made aware of flood resilience.
- Who will update the flood evacuation plan?

Further advice can be obtained with regards to how to prepare a flood plan and what the EA flood warnings mean at https://flood-warning-information.service.gov.uk/warnings

5. Surface water drainage plans should include the following:
   - Rainwater pipes, gullies and drainage channels including cover levels.
   - Inspection chambers, manholes and silt traps including cover and invert levels.
   - Pipe sizes, pipe materials, gradients and flow directions.
   - Soakaways, including size and material.
   - Typical inspection chamber / soakaway / silt trap and SW attenuation details.
   - Site ground levels and finished floor levels.

6. Surface Water Discharge From Greenfield Site
   The total surface water discharge from greenfield sites should be limited to green field run-off rates - up to 1 in 100 years storm + climate change. On site surface water attenuation will be required. If the greenfield run-off for a site is calculated at less than 2 l/s then a minimum of 2 l/s can be used (subject to approval from the LPA)

7. On Site Surface Water Management
   The site is required to accommodate rainfall volumes up to 1 in 100 year return period (plus climate change) whilst ensuring no flooding to buildings or adjacent land. The applicant will need to provide details and calculations including any below ground storage, overflow paths (flood routes), surface detention and infiltration areas etc to
demonstrate how the 100 year + 30% CC rainfall volumes will be controlled and accommodated.

Where cellular storage is proposed and is within areas where it may be susceptible to damage by excavation by other utility contractors, warning signage should be provided to inform of its presence. Cellular storage and infiltration systems should not be positioned within highway. Guidance on flood pathways can be found in BS EN 752.

8. Watercourse consent may be required by the applicant from the Local Internal Drainage Board (Doncaster East) for any works on the watercourses adjacent to / crossing the site.
9. The proposed development is within the operating boundary of Doncaster East Internal Drainage Board, who should be consulted with regard to land drainage matters.

**Environmental Health**

This section has no objection in principle to the proposed mixed use development. However this is subject to the submission and agreement of a satisfactory noise impact assessment, which identifies sensitive noise sources and puts forward mitigation measures where appropriate.

The scope and of the noise survey and the assessment methodology should be agreed in advance with the LPA.

As the historic maps indicate that this development is not located on any previous industrial land and the development is not classed as a sensitive end use, contaminated land risk assessment would not be required.

External consultations have not been carried out as part of this process. It is recommended that the views of the Environment Agency, Highways England, South Yorkshire Archaeology Service and statutory undertakers are sought prior to lodging a planning application.

I hope the above advice is of assistance; should you feel you require further assistance regarding this matter, please don’t hesitate to contact me.

You should be aware that in the course of processing your application we might require further specific details to be supplied by you to enable us to give your proposal proper consideration and to avoid delays.

Any comments made during pre-application or application meetings by a Council Officer are informal and intended as guidance. Any such comments are made entirely without prejudice to any such decision that Doncaster Metropolitan Borough Council may make.

Please note all information relating to this Pre Application will be deleted 7 years after the Pre Application decision date.
Yours faithfully

Principal Planning Officer