1. **Question 2.1** Is the strategic aim to facilitate the delivery of at least 481 hectares of land for business (B1), general industry (B2) and storage and distribution uses over the plan period (2015 to 2035) justified and positively prepared?

1.1 Although we note that the target of 481 hectares is consistent with the Sheffield City Region job growth aspirations, we consider that there is a compelling case to increase this requirement, with a particular focus on B8 development. The reasons why are as follows:

1.2 **Firstly**, the plan as drafted will not provide for a 15 year employment land supply on adoption, as we explain in our statement in relation to Matter 1 (Question 1.8). Given that the plan is likely to be adopted in 2021 at the latest, there is a need to increase the requirement by a minimum of one additional year to provide the 15 year plan period from adoption as required by the NPPF. Taking the existing employment requirement (24 hectares/annum) at face value, this means that it should be increased to 505 hectares (i.e. + 24 hectares) at the very least with a corresponding uplift in the supply.

1.3 **Secondly**, Policy 3 refers to the need to deliver **at least** 481 hectares of employment land over the plan period, but no part of the policy (or any other policy within the plan) sets out the ‘type’ of employment land that is required. This does not accord with Para 8 a) of the NPPF, which states that an economic objective of the planning system is to ensure that sufficient land of the right type is available in the right places.

1.4 The March 2019 Employment Land Availability Assessment (ELNA) indicates that the breakdown of the 481 hectares, over the plan period is as follows:

- 14 Ha for office development
- 125 Ha for industrial
- 73 Ha for non-strategic warehousing
1.5 It can therefore be seen that the reality of the situation is that over 70% of employment land expected to be required over the plan period will comprise B8 development, and of this, a very large proportion will be needed for 'strategic warehousing' i.e. large sites close to motorway junctions. This reflects Doncaster’s success as a location for major logistics occupiers, as evidenced by the developments at Iport, West Moor Park and the recent announcement that a large proportion of Unity is to be taken up by the distribution arm of a major retailer (as confirmed in the News section of the Unity website). At present Policy 3 does not reflect this balance of need, nor are sufficient sites of the right type and kind allocated to meet the B8 requirement.

1.6 Policy 4 confirms that there are only 6 employment allocations in the Local Plan, with much of the remainder of the supply either taken up or subject to a grant of planning permission. Sites 092 (Balby Carr), 258 (Middle Bank) and 1032 (Rossington) are too small to accommodate large, strategic warehousing developments - which is the type of B8 development that the ELNA expects to be required in greatest quantity over the plan period. Of the remaining three sites, we comment as follows:

- **001 (Thorne North)** - our Publication Draft representations express concern that Thorne is not an established location for warehousing development in market attractiveness terms, and there is a limited catchment population. From a market attractiveness point of view it is a ‘second tier’ location for major B8 development.

- **441 (Carcroft)** - our Publication Draft representations state that we do not consider that this is a strategic warehouse location, as it is too remote from major transport infrastructure. The site requires major road infrastructure investment to open it up for development. Delivery of the A1-A19 link road cannot be relied on and there are significant barriers to the delivery of the scheme during the Local Plan Period.

- **941 (RHADS, Phase 4)** - this site is situated in the south west quadrant of the airport area and is only proximate to a single carriageway road and is remote from a
motorway junction. It is our opinion from a market perspective that development of this site will be contingent on the growth of the airport and airport related businesses.

1.7 **Thirdly**, consideration should be given to whether the employment requirement for the plan period of 24 hectares/annum is sufficient based on actual levels of take up of land. The Council’s 2019 Employment Land Availability Report states that the average take-up from 2005 to 2019 was 27 hectares/annum - 3 hectares in excess of that provided for by the plan. The Council’s Employment Land Review (ELR) provides a similar average figure over the period 2000 to 2017 (26.84 hectares/annum) and states that there is a general view that projections for online retailing will support increased take-up in the future (see Section 2.5 of ELR). Para 4.6.1 of the Local Plan confirms that over the period 2015 to 2018 take up was actually 117 hectares, which equates to 39 hectares/annum. Whilst this is a relatively short period, it suggests that the trend is for higher levels of take-up than the longer term average – not the lower than trend rate provided for by the plan.

1.8 **Fourthly**, the attached note by Hatch Regeneris ([Appendix 1](#)) states that there are strong grounds to revisit the employment land requirement in light of Covid-19, which has increased demand for warehouse space, but which could not have been taken into account by the Council’s Employment Land Need Assessment (ELNA). Hatch Regeneris refer to CBRE data on the logistics market and state that there have been record levels of take-up in Yorkshire in the first half of 2020 compared to the previous year. This has been driven by a surge in demand for online shopping (a trend which is expected to become permanent) and greater demand for storage space as companies manage the risks of supply chain disruption through Covid-19 and Brexit. Hatch Regeneris consider that it would be prudent to include a buffer of 10% in the employment land requirement to take account of these factors, however a figure greater than this is suggested by recent events.

1.9 **Finally**, we note that the Council published an Employment Land Supply Buffer Note in March. This seeks to respond to representations by our client (and others) that there is
insufficient flexibility in the supply of the Local Plan. We summarise our response to the Buffer Note as follows:

1.10 **Council claim:** The Peter Brett Associates forecasts identify that 193 ha is required over the plan period (originally 2015 to 2032). The total employment land figure in the plan of 481 ha includes additional land to take account of churn/frictional vacancy, competition and choice and potential losses to other uses. Furthermore, a jobs led scenario has been selected as the employment land requirement. This is in line with Sheffield City Region aspirations and is ambitious but realistic.

1.11 **P+S response:** Although the City Region job target may be claimed to be ambitious, it is accepted as realistic and matches actual take up. It starts from a legacy of industrial job losses in the area and past under performance compared to the rest of the UK. The allowances made for churn/frictional vacancy, competition, choice and losses to other uses are perfectly normal adjustments when calculating an employment land requirement. None of this obviates the need for a buffer for unexpected events. Furthermore, the Peter Brett forecasts pre-date the Brexit/Covid-19 factors we refer to above, which are increasing the demand for B8 floorspace.

1.12 **Council claim:** Three allocations have the capacity to provide for additional land after the plan period and therefore this land can be brought forward sooner if there is demand.

1.13 **P+S response:** In respect of Thorne North, we have objected to both the proposed allocation and the current planning application for a number of reasons including transport, accessibility, flood risk and the sequential approach. Until such time as all consultees have confirmed that they are happy with the application it is premature to conclude that it will deliver the quantities of land anticipated by the Local Plan allocation. Indeed the Council’s own consultants (Colliers) suggest it will not. It is understood that Highways England will only agree to a certain proportion of development taking place (20%) before a future review of J5/J6 of the M18 that takes into account traffic created by the DN7/Unity development, and this review will be secured by condition. This casts some doubt as to the legitimacy of this approach, and
whether the future review of J5/J6 and agreement on any mitigation required, could delay and constrain delivery of Thorne North.

1.14 Regarding Carcroft Common, this site was identified as a reserve site as part of the Doncaster UDP, but it has not been taken up for over 20 years, which casts doubt on its developability. We have objected to this allocation in the Publication Draft representations. The primary reason for this is that the site has poor accessibility to the motorway network and the plan acknowledges that it is dependant on a new link between the A19 and A1M. There is no timetable or funding for this infrastructure and therefore no certainty as to when Carcroft will be delivered.

1.15 In relation to Balby Carr, this is modest in size, unsuitable for strategic warehousing and we have expressed doubt about access to the site in our Publication Draft representations.

1.16 Council claim: There are 2 sites with permission in the Local Plan that have the capacity or additional land to come forward after the plan period. This totals 34.52 ha:

- 418 Unity – within plan period 33.6 ha, post plan period 33 ha
- 569 Askern Saw Mills – within plan period 2.27 ha, post plan period 1.51 ha

1.17 The Council also states that there are also 6 small sites totalling 5.2 ha with permission that are not included as part of the employment land supply. Details of these sites are not included.

1.18 P+S response: An announcement has recently been made that the promoter of Unity, Hargreaves Land, has agreed terms with a national retailer for approximately half of the 66.6 ha of employment land proposed (please refer to News section of Unity website). This is an indicator of strong demand for sites with good accessibility to the M18, and underlines the need for a greater choice of sites to meet this demand over and above the ‘minimum’ requirement, if Doncaster is to capture occupiers looking for locations of this kind. There is no buffer at Unity.
1.19 Regarding Askern Saw Mills, we understand that the site is in two ownerships and there is a disagreement on land value. Reserved matters (16/01651/REMM) pursuant to an outline consent were submitted in 2016 and this application is still pending. It is in any event an insignificantly small site.

1.20 Council claim: There is an additional supply of smaller sites which comprises available land within existing employment sites that are washed over as Employment Policy Areas. This amounts to 35 ha.

1.21 P+S response: Most of these sites are very small in size (as small as 0.26 ha) and therefore this casts doubt on their ability to meet the type of needs anticipated by the Peter Brett assessment (or unforeseen needs) i.e. B8 warehouses close to motorway junctions are by far the largest component of the need and they typically will have a large land take. The developability of the sites for employment is not known because they have not been assessed as part of the Local Plan process.

1.22 In the light of all of the above, we do not consider that the employment land requirement is justified or positively prepared. Long term and short term take up trends indicate that the requirement will not provide sufficient land to meet demands; it will not be flexible enough to accommodate needs not anticipated in the plan (such as those identified by Hatch Regeneris); and it will not allow a rapid response to changes in economic circumstances (such as those that may emerge as result of Covid-19). In this context the 10% buffer proposed by Hatch Regeneris is a pragmatic and prudent response to these factors.

1.23 Application of this 10% buffer increases the requirement to 529 hectares and produces an annual figure of 26.5 hectares, which is more in line with the long term average take up rate in Doncaster. Provision of an extra year to ensure a 15 year requirement on adoption of the plan further increases this to 555 hectares.

1.24 We are also concerned that the plan does not reflect the balance of the ‘type’ of employment land needed over the plan period. For the reasons explained above, over
70% of employment land expected to be required over the plan period will comprise B8 development, and of this, a very large proportion will be needed for ‘strategic warehousing’ i.e. large sites close to motorway junctions.

1.25 Our client’s proposed employment allocation at West Moor Park East (937/1031) can help provide for the additional supply implied by the revised requirement we refer to above in respect of quantity and type
1. **Response to Q2.1**

Is the strategic aim in policy 3 to facilitate the delivery of at least 481 hectares of land for business (B1), general industry (B2) and storage and distribution (B8) uses over the plan period (2015 to 2035) justified and positively prepared?

1.1 The target of 481 ha set out in the Publication Local Plan was calculated in the 2019 Employment Land Need Assessment (ELNA). This used employment forecasts produced by Experian to derive future employment land requirements, based on a number of assumptions about the relationship between sector growth and floor space requirements. This is a commonly used method for estimating employment land requirements, and is one of a number of methods recommended by PPG.

1.2 The target of 481 Ha was based on a scenario in which the number of jobs grows by around 1% p.a. This is consistent with past trends in jobs growth in Doncaster and the Sheffield City Region’s growth aspirations. The target is also broadly consistent with past trends in the take-up of employment land in Doncaster. On this basis we agree that the target was justified and positively prepared based on the evidence available at the time.

1.3 However, we believe there are strong grounds to revisit the assessment in light of the Covid-19 pandemic which is likely to increase the demand for employment land, but which was not taken in to account in the original assessment.

1.4 There is now clear evidence that warehouse and logistics operators have experienced a marked increase in demand since the start of the pandemic. CBRE reported in July that the UK logistics market recorded the highest quarterly take-up figures on record in Q2 2020, achieving total take-up of 12.78m sq ft compared to 7.83m sq ft in Q2 2019. CBRE’s report also showed record levels of take-up in the Yorkshire and North East region, in which Doncaster is located. Take-up in the first half of 2020 was 6.6m sq ft which is more than double that of the whole of 2019 and only 90,000 sq ft less than for the whole of 2018, the region’s previous record year.

1.5 This surge in demand has been driven by a large increase in online shopping since the start of the pandemic. This has been growing for many years but has accelerated in 2020, increasing by over 10 percentage points between February and April 2020 (see Figure 1.1). CBRE estimate that 44% of the take-up this year has been from online retail and attribute the increase to national occupiers reshaping their warehouse and supply chain strategies in response to the shift in shopping habits.

1.6 Although the percentage of retail sales online has since fallen from its lockdown high, this is still well above its pre-lockdown level, with agencies such as Colliers expecting it to settle at around 28% of total retail sales. The RetailX attitudes survey also suggests that some of the recent rise is likely to become permanent, with 24% of respondents reporting that they will carry on shopping as they are now after the Covid-19 health issue is over. This means that demand for warehouse space is also likely to be higher than it was before the start of the pandemic, which was not taken in to account in the 2019 ELNA.

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1.7 In addition to the growth in online shopping, the Covid-19 pandemic is also likely to increase the need for storage space across a range of industries as firms seek to manage the risks of supply chain disruption from the global pandemic. This is likely to exacerbate other risks such as Brexit and heightened global trade tensions which also threaten supply chains as a result of increased barriers to trade. According to JLL's research report Covid-19 Global Real Estate Implications "the outbreak is likely to elevate the issue of supply chain risk mitigation and resilience" which could lead to:

- increasing numbers of businesses looking to re-shore their supply chains which would increase demand for industrial facilities and associated logistics
- firms deciding to increase their inventory levels to manage uncertainty and disruption, which would increase demand for warehouse space.

1.8 Again, these factors were not factored into the employment land assessment which was based on employment forecasts produced in December 2017. This was before the pandemic and before the change in Prime Minister and General Election in 2019. This has resulted in a UK Government more favourable to a “hard” Brexit and increased the risk of future trade barriers.

1.9 We therefore believe there have been a number of structural changes in the economy since the 2019 ELNA which are likely to increase the need for warehouse space in Doncaster over and above pre-pandemic levels, and which were not taken into account when calculating the target of 481 Ha. While it is too early to carry out a robust quantitative assessment of the increased need for warehouse and logistics space, we believe it would be prudent to include a buffer of 10% to take account of this.