1. Question 3.3 Is the broad spatial distribution of development proposed in policies 2 and 3 justified? In particular, the aims to accommodate:

c) major new employment sites in locations accessible from the Main Urban Area and Main Towns in locations attractive to the market with good access to the strategic transport network as well as Doncaster Sheffield Airport.

1.1 We would agree with the broad principle of Policy 2 and Policy 3 that major new employment sites should have good access to the strategic transport network (in particular motorways) and the Main Urban Area/Main Towns, which provide a large potential labour resource. However, we are concerned about the following aspects of these policies and their application through the site selection process:

1.2 Firstly, we consider there is some tension between the employment approach of the two policies. Policy 3 refers to sites that are allocated for regeneration purposes, and Para 4.31 refers to land in the north of the Borough that has been allocated even though it has low values, flood risk issues and poor accessibility. However, these regeneration objectives are not reflected in Policy 2, nor do they feature in a transparent way in the site selection process of the plan.

1.3 Secondly, regeneration might be an objective of the Council, but the allocation choices of the Council are not justified if they conflict with national policy, nor are they effective if there are doubts about their deliverability. In this context our Matter 1 Statement identifies conflicts with national policy in respect of the SA process and flood risk sequential test as applied to employment options in the Local Plan, and concludes that these have been skewed by regeneration objectives of the Council. This was a concern of the Inspector’s Report for the withdrawn Doncaster Sites and Policies DPD, as we refer to within our Matter 1 Statement, particularly in relation to flooding and the sequential test.
1.4 Within our Publication Draft representations we also express concerns regarding the Council’s decision to scope out market/economic criteria within the SA process, and highlight particular concerns regarding the deliverability of employment allocations 001 (Thorne North) and 441 (Carcroft), which are located in the north of the Borough. It is unclear how the Council has tested the market attractiveness of employment options in that regard. The only evidence available appears to be the Colliers Employment Land Review, and we note that document itself identifies some concerns in respect of the deliverability of sites 001 and 441.

1.5 Thirdly, 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.

1.6 The March 2019 Employment Land Availability Assessment (ELNA) indicates that the breakdown of land needed over the plan period is as follows:

- 14 Ha for office development
- 125 Ha for industrial
- 73 Ha for non-strategic warehousing
- 271 Ha for strategic warehousing

1.7 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’. 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. Our
response to Matter 2 (Question 2.1) demonstrates that this is a trend that will be exacerbated by Covid-19/Brexit, which has increased demand for online retailing and storage space to maintain security of supply chain.

1.8 Accordingly, whilst we do not consider that the Plan should adopt rigid targets in relation to different types of employment provision, the location, size and distribution of sites should reflect the balance of the needs identified within the ELNA. This could be achieved by setting out indicative ‘minimum’ targets for each B class category within Policy 3, in accordance with the 2019 ELNA breakdown we refer to above. Furthermore, in respect of B8 uses, the policy should confirm that the greatest need is for large, strategic warehousing sites with good access to junctions on the M18 motorway.
2. Question 3.3 Is the broad distribution of development proposed by the employment allocations in policy 4 justified having regard to the aims set out in policies 2 and 3? Are any main modifications required to ensure that the Plan is unambiguous and internally consistent in his respect?

2.1 No.

2.2 The main point we wish to make in relation to this question, and in terms of the employment land strategy of the plan as a whole, is that the 2019 ELNA demonstrates that a very substantial element of the employment supply needed over the plan period will be for large B8 buildings, and this is exacerbated by Covid-19/Brexit, as we explain in our response to Question 3.2 above and Matter 2 (Question 2.1). Doncaster has an undeniably strong track record in this field, and logistics development has driven much of the take up of employment land in recent years, as shown by Table 7 of the March 2020 ELNA. This is a strength of Doncaster’s proximity to the M18/A1 and the East Coast ports via the M180.

2.3 The key requirements for major B8 developments include:

- By their very nature such developments require large sites, and as recognised by Para 4.28 of the Local Plan it is often the case that they should not be located immediately next to housing in order to avoid amenity conflicts.

- Sites should be located close to the M18/M180 motorway junctions, as recognised by Policy 3.

- Sites should be attractive to the market.

2.4 Sites should be accessible (actually in close proximity to as well as by different modes of travel) to a large working catchment of population, which is a key determinative of a successful B8 scheme.
2.5 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. Three of these 6 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 has poor access to the Doncaster Main Urban Area, that there is a limited working catchment population and it does not have good access to good quality bus services (or good quality train services); and that the site fails the sequential text for flooding given that all of it is located in Flood Zone 3 when there is a large area of Food Zone 1 land available at rejected site 937/1031 (WMPE) than can accommodate nearly all of the allocation. From a market attractiveness point of view our Publication Draft representations explain that Thorne is a ‘second tier’ location for major B8 development and they refer to the previous conclusion of the Council’s 2018 Site Selection Methodology that site 001 should be rejected on the ground of deliverability (this document is no longer available on the Council’s website and so we attach an extract for information at Appendix 1).

- 441 (Carcroft) – our Publication Draft representations state that we do not consider that this is an attractive strategic warehouse location, as it is too remote from major transport infrastructure. As Policy 3 points out, logistics sites should be on the M18/M180 corridor and only light industry and manufacturing on the A1/A19 corridor in relation to Service Towns and Larger Villages like Carcroft. The site requires major road infrastructure investment to open it up for development in any event. 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. Our Publication Draft representations also state that the site fails the sequential text for flooding given that all of it is located in Flood Zone 3 when there is a large area of Food Zone 1 land available at rejected site 937/1031 (WMPE) than can accommodate all of the allocation.
• 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 related to a Service Town/Larger Village, so low on the Policy 2 hierarchy. Our Publication Draft representations express the view that from a market perspective development of this site will be contingent on the growth of the airport and airport related businesses. Our Publication Draft representations also express concerns as to whether the site will have convenient access to high frequency bus services and the SA public transport score that has been awarded in that regard.

2.6 In summary, we do not consider that the distribution of allocations is justified, because the Council has not allocated sufficient land that is suitable and attractive for major strategic warehousing development – which is the priority need over the plan period. Such developments require large sites close to motorway junctions and with good access to a large population for labour, but we are concerned that the Council’s proposed allocation of sites 001 and 441 appears to have been skewed by the regeneration objectives referred to at 4.31 of the Local Plan. In contrast, our client’s proposed allocation at West Moor Park East (937/1031) meets all these requirements, as set out in Publication Draft Local Plan representations.

2.7 We comment on the proposed employment land supply of the Local Plan further (including sites with planning permission) under Matter 8.
Doncaster Local Plan

Housing & Employment
Site Selection
Methodology & Results
Report

September 2018

Please note, this document includes a number of pages which contain large volumes of data, detailed maps, and supporting information. As such, if this document is to be printed for reference purposes, it is strongly advised that some of these pages are printed at A3 size, sometimes in landscape orientation, and in colour in order for print/tables/maps to be clear and legible.
<table>
<thead>
<tr>
<th>Site Ref</th>
<th>Site Name</th>
<th>Gross Site Area (ha)</th>
<th>Reason for site being rejected</th>
</tr>
</thead>
<tbody>
<tr>
<td>001</td>
<td>Junction 6 M18, Thorne North</td>
<td>73.63</td>
<td>As with all the potential sites in the M18 Corridor, this site fails the flood risk sequential test as it is within Flood Zone 3. It also scores similar to the other sites through the Sustainability Appraisal process. It is currently within Countryside Policy Area as designated by the UDP. Although there are successful existing industrial estates to the north of Thorne which this site could complement and there is an outline planning application pending, there are concerns over the site’s deliverability as there are more deliverable sites elsewhere. The Doncaster Employment Land Review suggests that if allocated 50% of the site could be developed in the plan period (36.8ha). The majority of development could be for B8 and some for B2 (85/25% split). The allocation of this site would exceed the supply of employment land.</td>
</tr>
<tr>
<td>013</td>
<td>West Moor Park North</td>
<td>79.29</td>
<td>As with all the potential sites, this site fails the flood risk sequential test as it is within Flood Zone 3. It scores similar to the other sites through the Sustainability Process. It is currently within Countryside Policy Area as designated in the UDP. This site could build upon the success of the existing West Moor Park to the south. Locating sites close together benefits employers through improved public transport links and road connectivity such as the proposed widening of West Moor Link. It is considered that 50% of the site will be developed in the plan period (39.6ha). The majority of development will be for B8 and some for B2 (85/25% split). However the site is within multiple ownerships and there are doubts over deliverability particularly since there are more deliverable site elsewhere in the borough. The allocation of this site would exceed the supply of employment land.</td>
</tr>
<tr>
<td>041</td>
<td>Askern Industrial Estate</td>
<td>2.98</td>
<td>This site is classified as ‘reserve’ in HELAA – attractive to the market after other sites have been developed. The land owner has submitted the site for residential use. The site is currently split with good and poor quality units. The site is considered to be better suited to residential use.</td>
</tr>
<tr>
<td>091</td>
<td>Land adj to Fishlake Commercial Motors, Selby Road, Thorne</td>
<td>0.61</td>
<td>Without allocating site reference 001, this site is small and isolated from Thorne. It also fails the flood risk sequential test and is within the Countryside Policy Area as designated by the UDP.</td>
</tr>
<tr>
<td>101</td>
<td>Land North of A614/M18 Junction, Thorne</td>
<td>6.87</td>
<td>Without allocating site reference 001, this site is small and isolated from Thorne. It also fails the flood risk sequential test. It is currently designated as Countryside Policy Area in the UDP.</td>
</tr>
<tr>
<td>159</td>
<td>Land around Wadworth</td>
<td>495.40</td>
<td>Classified as ‘Reserve’ in HELAA – attractive to the market after other sites have been developed. The Green Belt Review Phase 3 states that there is a weak case for including the</td>
</tr>
</tbody>
</table>