1. Question 1.5 Did the sustainability appraisal consider and compare reasonable alternatives as the plan evolved, including for the broad distribution of housing, economic and other development? Was the plan informed by the findings of the sustainability appraisal?

Did the SA consider and compare reasonable alternatives as the plan evolved?

1.1 An assessment of reasonable alternatives has been carried out by the Council, however we are concerned that this has not been carried out on a rational or consistent basis, and this undermines the justification for selection of proposed employment allocations within the Local Plan.

1.2 At Publication Draft consultation stage our client submitted representations expressing the following concerns (Points 1 to 9 below) about the August 2019 SA’s assessment of employment options (please refer to our representations for further detail):

- **Point 1 - Failure to consider the availability of accessible local labour for employment allocations**

1.3 An essential driver of the attractiveness of an employment site to occupiers, and its overall sustainability, is the availability of labour in the locality. National and local policy seeks to minimise travel to work distances. The SA does not take account of this key factor.

- **Point 2 - Failure to consider the economic, market and growth suitability of the identified employment allocations**

1.4 Policy 2 and 3 as well as Para 4.27 of the Local Plan confirms that the distribution of employment sites in required in market attractive locations. Para 32 of the NPPF states
that SA should consider opportunities for net gains in economic objectives. However, Appendix A3 of the Housing and Employment Site Selection Methodology Report indicates that economic and growth criteria have been removed from the SA process. This is a highly relevant consideration and its absence has the effect of skewing the outcome of the SA work.

- **Point 3 - Unnecessary consideration of accessibility to defined shopping centres for employment allocations**

  1.5 This might be a relevant factor for housing options, but it is not a good guide to the sustainability of an employment site. Larger scale allocations are likely to have ancillary food and drink facilities; many businesses have in-house canteens and/or vending machines; and most industrial estates are visited by mobile catering companies. It is simply not a relevant criteria and has the effect of skewing the outcome of the SA.

- **Point 4 - Arbitrary flood risk threshold (20% or more of a site being in FZ3 equivalent to 100%) for negative flood risk scores**

  1.6 The rationale for a threshold as low as 20% is not justified. It is not a sound way of comparing the relative sensitivity of sites to flood risk or for directing as much development as possible to the lowest zones of flood risk, which is the overriding objective of the sequential test.

  1.7 Furthermore, under our response to Question 1.12 below we refer to Planning Practice Guidance (Reference ID: 7-020-20140306), which states that as some areas at lower flood risk may not be suitable for development for various reasons and therefore out of consideration, the Sequential Test should be applied to the whole local planning authority area to increase the possibilities of accommodating development which is not exposed to flood risk. By arbitrarily excluding certain parts of the Borough that have low flood risk when applying the sequential test for employment site options, the Council has adopted an approach that conflicts with this national guidance. The outcomes of the SA is skewed as a result.
• **Point 5 - Arbitrary exclusion of demonstrable public transport improvements proposed by site promoters**

1.8 The SA Addendum claims that all sites have the ability to improve public transport accessibility and therefore this information has not been used to revise SA scoring. However, the attached note by Sanderson Associates (Appendix 1) explains that this is a simplistic statement that does not take into account the feasibility or viability of such improvements (and which has been properly investigated by our clients in relation to proposed bus service improvements to site 937/1031 West Moor Park East (WMPE)). This is a critical point in respect of employment sites because accessibility to public transport has a bearing on accessibility labour – a key requirement for a successful major employment development.

• **Point 6 - Failure to consider the relative importance of different types of nature conservation sites or the potential for mitigation/enhancement where proposed by site promoters**

1.9 Para 171 of the NPPF states that plans should distinguish between the hierarchy of international, national and locally designated sites and allocate land with least environmental value. However, at present criterion 12A(i) of the SA would award the same score to a site that overlays a local wildlife site (even if that overlay were on a very small area of the site in question) to one that fully overlays a SSSI or SAC, contrary to national policy. There is also no attempt within the SA to differentiate the degree of harm to the designation, taking into account the amount of overlap with the designation.

1.10 We are also concerned that there is no consideration of the likely actual impact on designated sites where a site promoter has supplied appropriate mitigation/enhancement information to the Council.

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1 Our client has held discussions with First Bus, who have provided written confirmation of costed measures to provide a bus service extension to Site 937/1031. This would be self-funding after five years.
- **Point 7 - Failure properly to consider highways capacity/ rule sites out without evidence of a capacity problem**

1.11 The Highways Capacity for housing and employment is considered in a separate SA Technical Appendix. However, as explained in our Publication Draft representations, this relates to a very high-level assessment undertaken in 2015 of potential impacts on key junctions on the trunk road network only. No up to date, quantitative or qualitative assessment of the impact of allocations has been undertaken. It is therefore considered that the scoring is inaccurate and unreliable and it provides an insufficient basis upon which to consider operation to the highway network and access to employment sites.

- **Point 8 - Inaccurate SA scores for reasonable alternative 937/1031 (West Moor Park East)**

1.12 Please see comments below in relation to this point.

- **Point 9 - Inaccurate SA scores for proposed allocations 001, 092, 441 and 941**

1.13 Please see comments below in relation to this point.

1.14 A March 2020 Addendum to the SA has been issued by the Council as part of proposed changes to the Publication Draft Local Plan. Within the Addendum a response is provided in relation to our client’s comments on specific sites (see Points 8 to 9 above), however no attempt is made to respond to the fundamental points we raise regarding the methodology of the SA used to assess employment options (see Points 1 to 7 above). These points go to the heart of whether the SA is fit for purpose in terms of assessing the choices between different employment sites. Our concerns regarding the methodology therefore remain and we would ask that the Inspector explores these issues further during the Examination hearing.

1.15 In relation to the responses of the SA Addendum to the comments we have made on specific sites, we respond as follows:
Point 8 - Inaccurate SA scores for reasonable alternative 937/1031 (WMPE)

- **Distance to bus stop** - the SA Addendum claims that all sites have the ability to improve public transport accessibility\(^2\) and therefore this information has not been used to revise SA scoring. However, the attached note by Sanderson Associates (Appendix 1) explains that this is a simplistic statement that does not take into account the feasibility or viability of such improvements (and which has been properly investigated by our clients in relation to proposed bus service improvements to WMPE). This is a critical point in respect of employment sites because accessibility to public transport has a bearing on accessibility labour – a key requirement for a successful major employment development. There is a fundamental difference between general unspecified "mitigation" and specific, deliverable new service provision of high frequency, allowing access from a substantial population that is evidenced as being viable and self-sustaining in the long term. The latter reflects the case for WMPE.

- **Re-use of land and buildings** - the SA Addendum claims that the vast majority of WMPE is greenfield and therefore the current neutral score against this objective is justified. However, as demonstrated by the recent aerial photograph at Appendix 2, a substantial element of the site comprises a motocross facility comprising extensive areas of tarmac roads, hardstanding and engineered earth ramps/features that have resulted in a permanent change to the previous use of the land for agricultural purposes. A significant part of the site is previously-developed. We maintain that this warrants more than a neutral score in respect of the re-use of land.

- **Archaeology** - The SA Addendum claims that the red score (major archaeological objection) attributed to WMPE is justified by the Council’s archaeology evidence base. However, that evidence base is highly questionable, because the Council has granted planning permission for major motorsports facilities on the part of the land that is identified as having a major archaeological constraint, which would permanently disturb any archaeology (see approved masterplan and associated

\(^2\) Our client has held discussions with First Bus, who have provided written confirmation of costed measures to provide a bus service extension to Site 937/1031. This would be self-funding after five years.
decision notice at Appendix 3). A first phase of this development has been built out and thus the permission is extant. We maintain that the red score in respect of archaeology is therefore inappropriate.

Inaccurate SA scores for proposed allocations 001 Thorne, 092 Balby Carr, 441 Carcroft and 941-RHADS

1.16 The main point raised by our client in relation to the SA scores for these sites was in respect of access to high frequency bus services (Objective 3Aii) and access to a train station (Objective 3Ai). The general response of the SA Addendum is that distances to such facilities have been measured ‘as the crow flies’; and on that basis it is claimed that the scores are appropriate. However, the attached note by Sandersons (Appendix 1) shows that measuring distance as the crow flies is a misleading approach because it does not take into account constraints or barriers to accessing bus stops/services e.g. poor footway provision, and provision for crossing busy roads. The SA approach is therefore not providing a sound basis for comparing the actual public transport accessibility of employment options.

1.17 The Sandersons note also provides additional justification as to why our client maintains that the SA scores in respect of public transport accessibility for certain employment allocations are incorrect and/or flawed. In relation to access to a station, a further point is made; if the station provides little realistic prospect of travel to work by train its relevance needs to be assessed accordingly. In this case, for example the station claimed by the Council to be accessible from site 001 (Thorne) is not only further distant in reality, but is served hourly with limited stops in places of population, requiring for most a journey to central Doncaster first.

Was the plan informed by the findings of the sustainability appraisal?

1.18 The evidence suggests that in relation to employment options, the SA did not have a significant role in informing the selection of sites. Table 7.28 of the SA sets out the reasons for selecting and rejecting sites. The Table shows that in a number of instances sites that have been rejected (including WMPE- 937/1031) score similarly to sites that
have been proposed as allocations (including sites 001 and 441). The table also confirms that these proposed allocations fail the flood risk sequential test. We repeat the same text used in the table for each of Sites 001, 441 and 937/10131 below:

"As with all potential sites, this site fails the flood risk sequential test as it is within Flood Zone 3. It scores similarly to the other sites through the Sustainability Appraisal process." (our emphasis)

1.19 As explained below, this comment is relied upon even though some of these sites are all Flood Zone 3 and WMPE has substantial land that is not.

1.20 Table 7.28 goes on to refer to other factors that have been used to justify the allocation of sites. However, these are not objective criteria that have been consistently applied to each allocation through the SA process. They are more selective reasons that have been subjectively applied. For example, in the case of rejected site at WMPE -937/1013 the reasons include:

- It is currently within the Countryside Policy Area as designated by the UDP Proposals Map. **Our response:** the UDP is out of date, and it is the whole purpose of this Local Plan that it will be superseded. In addition most of the proposed allocations (including 001) utilise such land.

- The site is to the east of the M18 and more isolated than other options available across the Borough. **Our response:** allocation 001 is to the west of the M18, but in a similar location relative to the existing settlement of Thorne. In fact WMPE is the width of the motorway from one of the largest and most successful employment areas in the plan area.

- There are other options that offer better opportunities for sustainable development such as long term public transport access. **Our response:** this claim is unsubstantiated and ignores the information provided by our client in respect of proposed bus service provision.
• There are also concerns over vehicular access from Junction 4. Our response: the source of these concerns is not provided—there is no evidence base and there is comprehensive evidence from WMPE to the contrary.

• The allocation of this site would exceed the supply of employment land for this period. Our response: it is our view that the site is demonstrably preferable to a number of the proposed allocations. There is in addition a strong case for additional employment allocations in any event, as we explain in relation to Matters 2 and 8.

• Sites other than WMPE have been chosen in order to provide a balanced distribution of employment land across the Borough. Our response: Policy 3 of the Local Plan states that for main towns such as Armthorpe the spatial strategy is to locate new logistics employment in locations that can accommodate large buildings with good access to the M18/M180 motorways. Site 937/1031 WMPE fully accords with this. Furthermore, whilst the Council may seek to spread regeneration across the Borough (Para 4.31 of the Local Plan), by providing for employment allocations at Carcroft and Thorne for example, this will not be a successful strategy if those sites are not deliverable and attractive to the market. Such factors have not been taken account of within the SA process. Our Publication Draft representations set out concerns regarding the deliverability of both of these sites.

1.21 In the light of all of the above, we are concerned that the SA process for employment sites simply does not make sense. The Points 1-7 we refer at the start of this Statement are errors in the SA that skew the outcome and suggest that the allocations that are supported by the Council’s desire to see development in the north of the Borough, as confirmed at 4.31 of the Local Plan. The errors appear to support those sites. When those SA matters are considered properly, the support for those allocations is removed, particularly with an objective assessment of suitability and deliverability of those allocations.

1.22 It is difficult to avoid the conclusion that the SA has been an afterthought rather than forming an integral part of the site selection process to ensure that the most sustainable sites are proposed for allocation. It is therefore unsound.
2. Question 1.8 Is the Plan consistent with national policy that expects strategic policies to look ahead over a minimum period from adoption, or is it otherwise justified?

2.1 Para 22 of the NPPF is quite clear that strategic policies should look ahead over a ‘minimum’ 15 year period from adoption. If the plan is adopted in 2021, then a plan period of 2035 is not compliant and therefore unsound. A fourteen year period is not providing a sufficiently long term planning framework for Doncaster over which decisions on infrastructure and major investment can be properly planned. This undermines the purpose of the Local Plan process.

2.2 The NPPF also emphasises the need for up to date plans with an up to date evidence base (Paras 15 and 31). In respect of employment matters we have the following specific concerns in that regard:

- The Employment Land Needs Assessment (ELNA), which is based on job forecasts of up to 2032, has already been rolled forward by 3 years to 2035 to take account of a previous extension to the plan period. If adoption of the Local Plan is now expected in 2021 rather than 2020, then we would be concerned about a further roll forward of the ELNA without a more comprehensive update. By way of example, our client’s response to Matter 2 provides evidence that Covid-19 has increased demand for logistics space as a result of greater use of online retailing – take-up for Yorkshire and Humber in the first half of 2020 was more than double that for the whole of 2019 and there is an expectation of a material increase on the pre Covid position.

- If the Local Plan is going to be adopted a year later than anticipated, then it is likely that more employment land will have been taken up without a corresponding increase in the supply. This reduces the quantum of uncommitted land available for potential investors in Doncaster. An employment land supply that is substantially taken up or committed by the time the plan is adopted is not ensuring sufficient land of the right type is available in the right place in accordance with the economic objective of sustainable development (Para 8 of the NPPF).
• The Council’s response to PQ7 states that there are a number of employment allocations that have sufficient capacity to meet needs to at least 2036. However, it has not provided evidence as to how individual sites would be able to do this, and we set out a commentary on aspects of the Buffer Note in our client’s response to Matter 2.

2.3 In the light of the above we consider that it is imperative than there is a minimum of a 15 year plan period on adoption; sufficient deliverable/developable sites to meet needs over that period are provided within the plan with a realistic margin of flexibility to allow for unforeseen economic circumstances (Para 81 d of the NPPF); and the evidence that supports the plan is up to date in relation to the plan period on adoption.
3. Question 1.12 Are the spatial strategy and allocations in the Plan, including those listed above, consistent with national policy relating to development and flood risk?

3.1 As explained in our Publication Draft Local Plan representations in respect of the site selection process for employment options and employment allocations, sites 001-Thorne and 441-Carcroft, we have major concerns in relation to the application of the flood risk sequential test. These concerns are best articulated by reference to the Council’s approach towards our client’s rejected employment option 937/1031 (WMPE). In our Publication Draft Local Plan representations we confirmed that:

- 55% of the site (48.6 hectares) is located in Flood Zone 1;
- 41% of the site (36.5 hectares) is located is Flood Zone 3a.

3.2 For comparison, proposed employment allocations 001 (Thorne North) and 441 (Carcroft Common) are entirely in Zone 3a. Nearly all of the plan period component of Thorne North could be accommodated within the Zone 1 area of WMPE. All of the Carcroft site could be accommodated as an alternative.

3.3 Para 157 of the NPPF states that all plans should apply a sequential, risk-based approach to the location of development. This is to avoid "where possible" flood risk. Para 158 states that the aim of the sequential test is to steer development to areas within the lowest risk of flooding. Para 159 makes it clear "If it is not possible to locate development to areas with the lowest risk of flooding" (our emphasis) then the exception test may have to be applied to look at how sites can be made safe from flooding. Planning Practice Guidance (PPG) explains that the sequential test is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. The aim should be to keep development out of medium and high flood risk areas (Flood Zones 2 and 3) and other areas affected by other sources of flooding where possible.

3.4 The sequential test was an issue considered at depth by the Inspector for the previous withdrawn Doncaster Sites and Policies DPD (flood risk policy being a key reason for
withdrawal of the plan). The Inspector’s Report found that the Council had not justified its regeneration objectives over the correct and proper application of the sequential test:

Para 44 IR: “From the evidence before me, it is difficult to avoid the conclusion that the Council has chosen for allocation a number of sites to which it has a long-term commitment for the delivery of its regeneration efforts and has simply decided that these sites are so important to its efforts that this, by itself, is sufficient to provide the wider sustainability objectives and benefits required by the NPPF tests. I do not consider that this can be assumed. The NPPF tests ‘set a high bar’. It is only where it is ‘not possible’ to direct development to areas of lower flood risk that the Council can move on to apply the Exceptions Test. The test is not that it would be preferable to locate development in the areas of highest risk of flooding but that it should be impossible to do otherwise.” (emphasis added)

3.5 A proper and policy compliant application of the sequential test should therefore result in the Zone 1 element of Site 937/1031 being preferred over sites in higher zones of flood risk such as sites 001 and 441. However, the Council has not adopted this approach in the Local Plan, thus repeating the errors of the previous withdrawn Sites and Policies DPD by placing unjustified regeneration aspirations over the correct application of national policy (we express similar concerns over the SA process). Key aspects of the Council’s application of the sequential test which in our view are flawed are:

- The use of an arbitrary threshold of 20% of site area in Flood Zone 3 or more to award employment site options a negative SA score on flood risk. This means that sites that are 100% in Zone 3 or 20% are ranked the same regardless of the potential for some site options (such as WMPE- 937/1031) to provide the capacity to accommodate significant amounts of employment development in Zone 1. The Zone 1 element of WMPE is almost 50 hectares. Nearly all of the plan period component of Thorne North could be accommodated within the Zone 1 area of WMPE. All of the Carcroft plan period element (plus most of the post plan period quota) could be accommodated as an alternative.
Para 5.8 of the Flood Risk Topic Paper confirms that the Council has used an arbitrary threshold of 500m (defined as a desirable walking distance) from the existing urban area to determine an area of search for Class B2 uses when applying the sequential test. The effect of this is to exclude land within lower zones of flood risk that could accommodate such development – for example at rejected site 937/1031. The Council’s approach adopts a very conservative assumption that most people live close to the edge of the urban area; and disregards the possibility that people will commute longer distances using public transport or cycle. It also conflicts with the objective of Policy 3 of the Local Plan that industrial development should be located where it has good access to the M18/180 motorway because in many cases available land for major employment development close to the motorway junctions is outside the 500m search area (as shown by Map A of the Flood Risk Topic Paper – see Appendix 4).

Para 5.16 of the Flood Risk Topic Paper confirms that the Council has developed an area of search for B8 uses based on a 1km travel distance from motorway junctions along the M18. However, it has excluded land to the east of the M18 between Junctions 3 and 5 from this area of search. This has artificially excluded WMPE from assessment- scoped it out- in such a way that it is difficult to avoid the conclusion that this was designed specifically to ensure that our client’s land (WMPE - 937/1031), a substantial proportion of which is in Zone 1, as explained above never got a look in.

The Topic Paper’s justification for exclusion of B8 land to the east of the M18 between Junctions 3 and 5 from this area of search is because access is required to urban areas and its public transport accessibility. However, WMPE is only the width of the motorway from one of the most successful employment areas in the Borough and as part of the Publication Draft Local Plan representations we provided to the Council evidence to demonstrate that a development of site 937/1031-WMPE would have good access to a large amount of labour within the Armthorpe and Doncaster Main Urban Areas (and significantly in excess of proposed allocation 001). In addition, details of costed bus improvements that can be delivered by First Bus that would provide for an extension of an existing good quality bus service into a
development of site 937/1031 were provided as part of these representations. There is therefore no justification for the Council’s exclusion of our client’s land from the area of search for B8 uses.

- Planning Practice Guidance states at Reference ID: 7-020-20140306) that some areas at lower flood risk may not be suitable for development for various reasons and therefore out of consideration, but the Sequential Test should be applied to the whole local planning authority area to increase the possibilities of accommodating development which is not exposed to flood risk. By arbitrarily excluding certain parts of the Borough that has low flood risk when applying the sequential test for employment site options, the Council has adopted an approach that conflicts with this national guidance.

3.6 In the light of all of the above, we would ask that the Inspector carefully reviews the Council’s application of the sequential test for employment options. In our view it is not policy compliant, rational or sound.
APPENDIX 1

NOTE BY SANDERSONS ASSOCIATES
MATTER 1 – Sanderson Associates

Q1.5. Did the sustainability appraisal consider and compare reasonable alternatives as the Plan evolved, including for the broad spatial distribution of housing, economic and other development? Was the Plan informed by the findings of the sustainability appraisal?

Sanderson Associates (primary inputs on Sustainability Appraisal in addition to P+S)

Overview

- The key argument here is the position taken by the Council with regards to SA Criteria 3A (ii) Distance to Bus Stops and the methodology adopted in establishing the distance in question.

- The adopted methodology for this criteria is, in the Council's own words, “clear that it is based on SYPTEx’s high frequency bus network (actual bus stops shown in GIS) from which sites have been assessed using straight line as the crow flies distances using the closest site boundary”.

- It is considered that the Council has adopted an “over-simplistic” approach in its Sustainability Assessment particularly with regards to Employment Allocation Sites. It is considered that the approach should have been extended to cover additional criteria as indicated below:-

<table>
<thead>
<tr>
<th>Train Accessibility</th>
<th>Bus Accessibility</th>
<th>Cycle Accessibility</th>
<th>Road Access</th>
<th>Ability to minimise travel to work distances</th>
</tr>
</thead>
</table>

- Representations have been made, and are reiterated in this Examination process, that set out both the fundamental flaw in the approach taken and the resultant inconsistencies in the scoring against this criteria for a number of the employment sites under consideration.

Adopted Methodology

- It appears that the Council have adopted the following criteria for establishing the distance to bus stops for potential allocation sites:-

  + Site is within 400m of a bus stop on the high frequency network;
  0 Site is located 400m - 800m of a bus stop on the high frequency network;
  - Site is located over 800m of a bus stop on the high frequency network;

- High frequency service classed as "4 services per hour" - however, the quality and extent of that service, in terms of the number of community areas (population) to which it gives access and hence the ability to minimise travel to work distances, has not been considered.
• **Stops within 400m of the closest boundary of the site** - A number of the potential employment sites, by their very nature, are large areas of land and the methodology of assessing accessibility to the closest boundary does not accurately represent the extent to which a site can be considered as meeting the criteria. Should the majority of an employment site be outside of this criteria then the SA score should be adjusted accordingly.

• **Straight line distances** - whilst measuring a walking distance to a bus stop is considered an essential aspect of determining a site’s suitability for allocation, the methodology of using an ‘as the crow flies’ distance from the site boundary for walking journeys to a bus stop is again considered to be misleading as it does not take into account any constraints or barriers to accessing the bus stops/services in question. For example poor footway provision in terms of width, alignment, lighting etc.; barriers such as strategic road links with sub-standard crossing provision; high speed roads etc.

• The above approach and subsequent decisions are, therefore, considered to be flawed in many respects:-
  o As an example, Carcroft Common (Site 441) does not currently benefit from access to 4 services per hour for much of the day yet is being promoted for allocation; yet the Council state that it ‘…scores similarly to the other sites through the Sustainability Appraisal process.’
  o Similarly only a small proportion of the Carcroft Common Site (441) is within 400m of the Doncaster Road bus stops.

• Yet, the current accessibility scoring undertaken by the Council for the Carcroft site is shown in the following table:

<table>
<thead>
<tr>
<th>Site Reference</th>
<th>3A(i) Distance to Train Station</th>
<th>3A(ii) Distance to Bus Stop (SYPTED Core Network)</th>
<th>3A(iii) Distance to Cycle Network</th>
</tr>
</thead>
<tbody>
<tr>
<td>441</td>
<td>0</td>
<td>+</td>
<td>+</td>
</tr>
</tbody>
</table>

• A further Employment Allocation site, Land East of Poplars Farm, Auckley, similarly does not currently benefit from 4 frequent bus service per hour. Therefore, our earlier representation is still considered valid as we believe that this site should have scored orange rather than green in terms of Bus Accessibility (see summary table below).

<table>
<thead>
<tr>
<th>Site Reference</th>
<th>3A(i) Distance to Train Station</th>
<th>3A(ii) Distance to Bus Stop (SYPTED Core Network)</th>
<th>3A(iii) Distance to Cycle Network</th>
</tr>
</thead>
<tbody>
<tr>
<td>941</td>
<td>-</td>
<td>+</td>
<td>0</td>
</tr>
</tbody>
</table>

• With regards to the Thorne North site this is located over 800m from a bus stop. Therefore, the - score currently provided for bus accessibility (see summary table below) is considered to be correct. However, the site is still being brought forward for allocation in preference to WMPE.

<table>
<thead>
<tr>
<th>Site Reference</th>
<th>3A(i) Distance to Train Station</th>
<th>3A(ii) Distance to Bus Stop (SYPTED Core Network)</th>
<th>3A(iii) Distance to Cycle Network</th>
</tr>
</thead>
<tbody>
<tr>
<td>001</td>
<td>0</td>
<td>-</td>
<td>+</td>
</tr>
</tbody>
</table>
Had the more detailed analysis approach been adopted by the Council (as indicated in the Overview section), in what is after all a key decision process that will govern the planning system in Doncaster until 2035, it is considered that the following results would have been achieved:

<table>
<thead>
<tr>
<th>Site</th>
<th>Train Accessibility</th>
<th>Bus Accessibility</th>
<th>Cycle Accessibility</th>
<th>Road Access</th>
<th>Ability to minimise travel to work distances</th>
</tr>
</thead>
<tbody>
<tr>
<td>937/1031 West Moor Park East</td>
<td>-</td>
<td>+</td>
<td>0</td>
<td>+</td>
<td>+</td>
</tr>
<tr>
<td>001 Thorn North</td>
<td>-</td>
<td>-</td>
<td>0</td>
<td>+</td>
<td>-</td>
</tr>
<tr>
<td>092 Balby Carr Bank</td>
<td>-</td>
<td>0/+</td>
<td>0</td>
<td>0</td>
<td>+</td>
</tr>
<tr>
<td>441 Carcroft Common</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>+</td>
</tr>
<tr>
<td>878/1032 Rossington</td>
<td>-</td>
<td>+</td>
<td>0</td>
<td>0</td>
<td>+</td>
</tr>
<tr>
<td>941 Poplars Farm</td>
<td>-</td>
<td>0</td>
<td>0</td>
<td>0/+</td>
<td>0</td>
</tr>
</tbody>
</table>

Potential Accessibility Improvements – Bus Service Provision

- Evidence has been submitted that an existing frequent bus route (Service 15) can be extended into the WMPE site and that this service could become viable after five years without subsidy.

- The extension of the 15 Service frequent bus route into the site should, therefore, result in a light green score in relation to 'distance to bus stop (3A(ii))' as this would result in a stop within the proposed development, but West Moor Park East is currently awarded a pink (negative) score.

- However, the Council’s position is that any employment site is capable of funding diverted or new services. Whilst this is feasible the quality of provision that could potentially be achieved and the long term viability should, we believe, be a fundamental consideration in such a key long-term development plan decision.

- This is considered to be a significant failing in the Councils approach to the SA in terms of public transport.

- Whilst the WMPE developers have demonstrated that a sustainable bus service can be achieved, which is believed will be viable in the long-term, the promotors of other employment sites have not (e.g. Thorne North).

- Therefore, we do not consider that the score for WMPE, should be lower than other sites.

- We do not consider that the Thorne North site would be able to deliver a comparable level and quality of service to that which WMPE has demonstrated.

- There are a number of important factors in play the most important ones being the availability and suitability of services to divert to serve the employment allocation sites.
- WMPE has already demonstrated to the Council that an “in principle agreement” is in place with First Bus to divert services to serve the site. Despite the fact that the Thorne North application has been lodged for many months no such agreement has been demonstrated.

- Indeed no evidence has been put forward at all by the Thorne North developers that any negotiations have even taken place with any bus operators.

- In terms of suitability of available services it is also considered that WMPE is better placed than Thorne North in that the services provide connections to a wider community.

**Population Catchment**

- By extending the 15 service to the WMPE site, a substantial population catchment within the Doncaster district (including areas south west of the town centre) will be within a convenient walking distance of a bus stop that will provide direct bus services to WMPE.

- Based on initial estimates, an existing population of approximately 15,294 people across the borough would be served by a direct public transport service to the WMPE site.

- In addition, approximately 1,374 future residents from nearby planned and committed developments, could also be served by the extended 15 bus service; representing a potential future population of 16,668 combined.

- This represents a significant geographic area across Doncaster; in addition to Wheatley, residents of areas south west of the town centre including Balby, Hexthorpe and Edlington who would be able to directly access new employment opportunities at the WMPE site by sustainable modes of transport, without reliance on a car.

**Summary – Thorne North**

- To reiterate points already made and submitted to the Council, the Thorne North applicant has previously suggested that they could divert the No. 87 bus service to the site; and that this improvement could be delivered through the Framework Travel Plan.

- However, the updated Transport Statement submitted in support of Thorne North actually states that as the proposals are at outline stage, it is not possible for them to agree to the exact provision at this stage.

- This approach is considered to be totally unacceptable. The site is proposed for allocation and is the subject of a current planning application. If the developers of the WMPE site are able to demonstrate the deliverability and future viability of significant public transport improvements it is incomprehensible that the Thorne North developer is unable to do so.
• This gives no reassurance to what, if any, bus service improvements may be provided in association with the Thorne North site. This is considered to be an essential aspect of any major employment allocation/development but is particularly important in this instance given that the site is currently totally inaccessible by public transport given its remote location.

• It is noted that Highways England have also made the above point in their original consultation response, stating that “The development of the site should be absolutely contingent on these improvements to public transport coming forward, with details provided of the anticipated funding and where this funding will come from.”

• The nearest bus services to the Thorne North development are the 86 and 87 services. The Table below indicates the existing service frequencies:-

<table>
<thead>
<tr>
<th>No</th>
<th>Route</th>
<th>Approximate peak frequency</th>
<th>Mon-Sat Daytime</th>
<th>Mon-Sat Evening</th>
<th>Sunday</th>
</tr>
</thead>
<tbody>
<tr>
<td>86</td>
<td>Thorne - Moorends</td>
<td></td>
<td>90 mins</td>
<td>No service</td>
<td>No service</td>
</tr>
<tr>
<td>86a</td>
<td>Thorne circular</td>
<td></td>
<td>90 mins</td>
<td>No service</td>
<td>No service</td>
</tr>
<tr>
<td>87/87a/87b</td>
<td>Doncaster – Moorends</td>
<td>10-25 mins</td>
<td>60 mins</td>
<td>30 mins</td>
<td></td>
</tr>
</tbody>
</table>

• Without confirmation that all Service 87 (or to a lesser extent Service 86) journeys are to be extended (or if less how many) and how attractive the resulting public transport service is likely to be it is considered that the WMPE site is preferable to Thorne North in allocation terms.
APPENDIX 2

AERIAL PHOTOGRAPH OF WMPE (937/1031)
APPENDIX 3

MASTERPLAN FOR EXTANT PERMISION AT WMPE (937/1031)
APPENDIX 4

MAP EXTRACT FROM FLOOD RISK TOPIC PAPER
Map A: Employment Areas of Search for Offices, Business and General Industrial and Storage and Distribution