Hearing Statement – Matter 3

Doncaster Local Plan

On behalf of Harworth

August 2020
1. **Introduction**

1.1. This is a Hearing Statement prepared by Spawforths on behalf of Harworth in respect of:

- Matter 3: Strategic Approach

1.2. Harworth has significant land interests in the area and has made representations to earlier stages of the Local Plan process.

1.3. The Inspector’s Issues and Questions are included in **bold** for ease of reference. The following responses should be read in conjunction with Harworth comments upon the submission version of the Doncaster Local Plan, dated September 2019.

1.4. Harworth has also expressed a desire to attend and participate in Matter 3 of the Examination in Public.
2. **Matter 3 – Strategic Approach**

Q3.1. Is the presumption in favour of sustainable development set out in Policy 1 consistent with national policy and would it be effective in helping decision makers know how to react to development proposals?

2.1. Harworth has no specific comment in relation to this issue.

Q3.2. Is the broad spatial distribution of development proposed in Policies 2 and 3 justified? In particular, the aims to accommodate:

a) At least 50% of new homes in and around the Main Urban Area; approximately 40% at seven Main Towns; and about 10% at ten Service Towns and Villages.

b) The ranges for the number of new homes in and around each of the individual Main Towns and Service Towns and Villages.

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.

d) Retail, leisure, office, cultural and tourist developments in the network of town centres defined in Table 2.

2.2. Harworth has raised significant concerns relating to the overall need for development proposed in Policy 3, as set out in our Matter 2 Participant Statement. Harworth is also concerned with the Plan’s Spatial Strategy and distribution of development and the consistency between the proposed distribution established within Policy 2 and 3 and the proposed allocations for housing and employment in the Plan.
2.3. Policy 2 and 3 focus growth towards Doncaster, followed by the Main Towns and then a smaller element within the Service Towns and Larger Villages.

2.4. Harworth consider that distribution across the Main Towns should not just reflect the current size of the towns but also reflect their location with respect to the wider economic growth aspirations of the Borough.

2.5. Harworth consider that consistent with paragraph 4.31 of the Submission Plan, the target for the level of employment growth in Thorne and Moorends should have regard to its regeneration ambitions, the IMD 2019 indicates that deprivation has worsened within Thorne Moorends since 2015, with the ward containing neighbourhoods which are amongst the 10% and 20% most deprived neighbourhoods in the country. Regard should also be given to its location on the Strategic Road Network, its opportunities for multi modal transport, and the level of facilities available including within the designated town and local centres, and train stations. Given the need for regeneration and investment within Thorne Moorends, as sought within the Plan 16.131, and evidenced in latest IMD data, and in recognition of the location of Thorne Moorends and its connectivity to the transport network it is vital that sufficient land for employment is identified within Thorne Moorends. Harworth consider that within this overall strategic approach, new allocations should be informed by an adequate Level 2 SFRA, ensuring that allocations are appropriate.

2.6. Harworth consider that major/strategic new employment sites, capable of servicing the needs for big box manufacturing and logistics, should be allocated in locations that are accessible from the Main Urban Area and Main Towns in locations that are attractive to the employment market with good access to the Motorway network (M18 and M180) and strategic transport network. Knight Frank (Appendix 1) note that the M18 corridor is an established industrial and logistics corridor that enables access to 75% of the UK population within a 4.5 hour drive time. Harworth consider that the M18 corridor includes locations off Junction 1 the M180. Knight Frank note that Junction 1 of the M180 has direct access to the M18 intersection, and locations off this junction, such as Bradholme Farm (Site 180), should be firmly considered part of the M18 corridor (Appendix 1). Harworth consider that the Local Plan Key diagram should express the spatial strategy for the location of employment uses expressly identifying the M18/M180 corridor as the appropriate location and hence providing a spatial interpretation of the employment strategy / policy approach.
2.7. Harworth also consider that in order to ensure consistency between the Plan [paragraph 4.27, Policy 14 and between Policy 2 and Policy 3] and the Framework [paragraphs 102, 108, 110], the table in Policy 3 in relation to employment uses (logistics and light industry and manufacturing) within the MUA and Main Towns should be revised. Harworth consider that the table should focus strategic large scale employment allocations, i.e those that can accommodate units of over 100,000 sq ft, in “locations that are accessible from the Main Urban Area and Main Towns, with good access to the M18/M180 motorways and can accommodate large buildings”. Harworth consider that this is critical to ensure consistency between Policy 2 as submitted and Policy 3, Policy 14 and national policy. This will ensure that employment development/allocations have strong accessibility and connectivity between residential areas and employment sites via a range of modes, in particular sustainable modes and hence should support safe access for all and active travel. Making this amendment within policy will be more important should Policy 2 be modified in line with the suggestion in response to PQ14 [DMBC 7].

2.8. Harworth considered the need for employment land and the nature of demand in Matter 2. The Employment Land Review by Colliers [SDEB 10] concludes that the industrial market, both nationally and regionally is the strongest performing commercial property sector. Its future prospects are underpinned by the growth in online retailing and also increased take up in manufacturing. SDEB 8 concludes that demand is focused on warehousing (71%), with 56% of demand being for employment land for strategic warehousing [SDEB Table 12]. This confirms continued demand in the M18 / M180 corridor. In Matter 2, we conclude that the Plan should be establishing a minimum requirement of 31.5 ha per annum to meet the evidenced demand. It is therefore vital that there are sufficient allocations capable of accommodating the needs of strategic warehousing and are on locations with accessible to MUA/Main towns within the M18/M180 corridor.

2.9. Harworth consider that there is a need to review the draft employment allocations within Policy 4, Table 4 to ensure that the proposed allocations reflect the Strategy as set out in Policy 2 and 3. There are limited allocations capable of accommodating strategic warehousing / distribution identified within the Plan. These are site 418, site 747 and site 001, the latter of which we have significant concerns relating to its identification. Further as at 2020, there are only two other sites, comprising 12 and 13 hectares of available land, located along the M18 corridor (1099 and 818). Harworth consider that the Plan should make additional employment allocations with good access to the M18 / M180 corridors that are capable of...
meeting the identified need for bog box logistics, and manufacturing, and critically align with the wider aims and ambitions to deliver regeneration in the north of the district, including Thorne Moorends, as expressed in paragraphs 2.18, 3.5, 4.31, 16.130, 16.131, and Policies 2 and 3.

2.10. **Harworth consider that the approach to the spatial distribution of employment sites needs to be reconsidered in order to ensure internal consistency within the Plan policies and approaches.**

Q3.3. **Is the broad spatial distribution of development proposed by the employment and housing allocations in policies 4 and 6 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 this respect?**

2.11. Harworth have noted in response to Q3.2 that modifications are required in the table in Policy 3 in order to ensure consistency between Policy 2, Policy 3, Policy 14 and national policy.

2.12. Harworth have considered the suitability of site 001, against the policy context provided within the Plan, under Matter 8 in response to Q8.4. In summary Harworth do not consider that the allocation of site 001 Thorne North, is consistent with the policy approach within the Plan or national policy and its allocation has arisen as a result of significant flaws in the site selection process, as set out in response to Matter 1 (in response to Q1.5 and Q1.12).

2.13. Site 001 Thorne North is located within the M18 corridor, however it is not considered accessible, in the context of the Framework, to the main town of Thorne – Moorends. Appendix 2, by DPL considers the consistency of the allocation at Thorne North with the Framework and the Submission Plan in the context of accessibility, demonstrating that the allocation of site 001 Thorne North is not consistent with the Framework with regards to accessibility. Harworth do not consider that the allocation is therefore fully consistent with Policy 2 and 3. Harworth maintain (through responses to Matter 1 and Matter 8, and their associated appendices) that Omission Site 160 is consistent with the broad spatial distribution established in Policy 2 and 3. It is firmly located within the M18 / M180 Corridor, and is consistent with the Plan and the Framework’s approach to sustainable transport and access.
(Appendix 2). The site is offers the potential for multi-modal transport, and is accessible from the Main Town of Thorne Moorends via a range of sustainable transport modes, and its allocation would serve to support the regeneration of Thorne Moorends. The Plan should be modified to delete employment allocation site 001, Thorne North, and the employment need should be met by allocating site 160 for employment purposes.

**Q3.4. Is the suggested change to policy 2 set out in the Council’s response to PQ14 necessary to make the Plan sound?**

2.14. Harworth have no specific comment in relation to this issue, subject to the amendment to the table in Policy 3 in relation to strategic employment land ‘locations, that are accessible from the Main Urban Area and Main Towns, with good access to the M18/M180 motorways and can accommodate large buildings’. This is necessary in order to ensure that Policy 3 is consistent with Policy 2 as submitted, and the preceding text on the ‘Spatial Strategy’ as proposed. We have set out in response to Q3.2 and Q3.3 the additional changes that we consider necessary to ensure that the Plan is internally consistent and can be considered ‘sound’. Harworth’s response to Matter 14 sets out suggested amendments to Policy 2 with regards to national policy on Flood Risk.

**Q3.5. Is the approach to deciding development proposals based on the figures for new homes set out in policy 3 for Doncaster Main Urban Area, the Main Towns and the Service Towns and Larger Villages justified, and is it sufficiently clear to be effective?**

2.15. Harworth has no specific comment in relation to this issue.

**Proposed Change**

2.16. To overcome the objection and address soundness matters, the following changes are proposed:
• Review and amend text within Policy 3 to ensure that the Plan is internally consistent.

• Amend the Key diagram to aid interpretation of Policy 2 and 3.

• Ensure that allocations align with the spatial strategy.

• Review employment allocation site 001 at Thorne North, and replace it with Omission site 160, Bradholme Farm to ensure that the allocations align with the spatial strategy, market demand, accessible by a range of sustainable transport modes and identified need for regeneration in Thorne Moorends identified within the Plan.
Appendix I – Employment Land – Supply and Demand, Knight Frank, August 2020
Dear Joanne

**Gateway 180 at Bradholme Farm**

**Introduction**

Following the Employment Land Need and Demand Assessment Report which was prepared in September 2019 in relation to the promotion of Gateway 180 at Bradholme Farm, Thorne, Junction 1 M180 as an employment site, Knight Frank LLP have been asked by Harworth Group to provide a market update. The purpose of the update is to consider the impact of Covid-19 on the market both at a National and Regional level.

The report is focused on the strategic employment sites capable of accommodation units of 100,000 sq ft plus which we feel are comparable to Gateway 180.

The report will consider the following:

- National Market Overview
- Regional and Local Market Overview
- Update on current Supply
- Conclusion

**Location**

Gateway 180 at Bradholme Farm extends to approximately 256 acres (104ha) and is being promoted for B1 (c), B2 and B8 uses. From the masterplan provided, we understand that the site can accommodate up to 2.6m sq ft in a variety of building sizes.

Gateway 180 located at Junction 1 of the M180 close to the M18 intersection, easily accessible to the national motorway network forming part of the M18 corridor.

**National Market Overview**

The outlook for industrial and logistics accommodation across the UK remains positive. Whilst by no means immune from the impact of Covid-19, arguably it is one of the few sectors that is benefiting from our changes in habits following the lockdown.
The end of 2019 was dominated by Brexit and the uncertainty across the market. The general election result in December 2019, brought a degree of certainty to the Brexit issues, albeit with arguably the most difficult negotiations still to come and brought a close to a stop/start year for all sectors of the market.

The impact on the logistics & industrial market was immediate with a flurry of large investment and some occupational deals being completed ahead of year end. No one was prepared for what was to come during the first quarter of 2020 when Covid-19 hit resulting in unprecedented personal and professional challenges for everyone with the focus on staying safe.

As we all adapted to our new normal of staying home and the resultant closure of the high street, we all turned to online retail to source basic needs and to fulfil shopping habits.

We have seen the transfer of billions of pounds of retail sales to online and away from the lockdown hit physical retail sector with many retailers rationalising their high street offering and unfortunately some occupiers have not survived. This has included the likes of Laura Ashley, Warehouse and Oasis where interestingly their on-line presence has been acquired by other retailers.

Turning to the impact on the Industrial and logistics sector, the large box logistics market has remained active since lockdown, with an initial flurry of short term Covid-19 related requirements from the supermarkets and food suppliers as well as emergency requirements to support the NHS. We also saw an increase in short term requirements emanating from retailers looking to house excess stock for anything from 4 to 12 months.

Following the easing of lockdown, Knight Frank have seen the corporate sector looking to the future and the eventual exit from lockdown, assessing their strategic needs whilst prioritising projects. Since lockdown, we have also seen businesses adopting to a new “normal” in terms of their operations and routes to market.

Knight Frank registered close to 7 million ft² of short term requirements following lockdown, and whilst many have been absorbed into existing Third Party Logistics (3PL) networks, there is very little “grey space” left unaccounted for and we are starting to see a significant increase in demand from 3PL enquiries as a result. It is reported that the 3PL sector is running at over 90% capacity which is beyond Christmas peak.

In addition, Amazon have continued to take more space throughout the lockdown, with deals on over 4 million sq ft of existing and bespoke design and build space, accounting for about 25% of the year’s long term take up to date.

H1 2020 take up totals c 17 million sq ft of completed deals, with 12 million sq ft concluded post lockdown.
Whilst the logistics and industrial markets have not been immune to the impact of Covid-19, the sector has bounced back, and enquiry levels are back to the levels prior to lockdown and in some cases ahead.

The lockdown has expedited the move to online/home delivery, especially within the grocery market. It is anticipated, that if a fraction of new online shoppers remains using the services post lockdown – anticipated growth from 5% to 8% - then this will require a significant amount of additional warehouse space. There continues to be a shortage of good quality well located sites for warehousing/industrial development, whilst recent letting activity has accounted for a significant element of standing stock.

As ever in such tumultuous times, there are clear winners and losers – with increased sales for online and food delivery together with the 3PL’s servicing these sectors. Whilst the lockdown as adversely impacted automotive, fashion and high street retail, the full impact of which is still to be felt in terms of business failures and rationalisations.

In addition, Knight Frank are starting to see the first signs of the impact of social distancing on large scale fulfilment operations, where order processing capacities have been reduced. Operators are of the view that social distancing measures are likely to remain in force for the medium term – years not months – or until a vaccine is developed. As a result, we are starting to see the first enquiries for additional space to address these issues.

Longer term, we expect the impact of social distancing to result in changes to warehouse design and a possible move to campus type operations (adjacent units, capable of being run by a single management team) rather than single large box operations, as well as a continued move to increased automation and robotics.

Automation is dependent upon creating economies of scale and as a consequence is only really viable on a large scale, with most automated facilities being in excess of 400,000 sq ft and is also capital intensive, which means it may remain beyond the reach of many retailers. Increased automation does not necessarily significantly impact headcount, but rather increases productivity. Consequently, it will not be the sole answer to lessening the impact of social distancing on existing operations.

The UK is the most developed online retail market in Europe, with the highest penetration rates. Occupier demand for UK logistics property is being driven by a confluence of macro trends, which include the growth of e-commerce, globalisation of trade, technological advancements and the drive for supply-chain optimisation.
The need for large scale fulfilment and ‘near-urban’ warehousing has been the primary driver of take-up in recent years. The Covid-19 crisis has meant a forced acceleration of the shift to everything online.

Online sales as a proportion of all retailing was 41% in July, this was a deceleration on the 3-month average achieved during lockdown which was at approximately 50%. The slowdown is influenced by the high street reopening although less than half of all stores have re-opened and consumer confidence relating to visiting shops is down. We anticipate that this will rebalance over time but will not go back to the previous levels. The growth is remarkable in such a short space of time. Projections before Covid-19 indicated reaching the current level by 2025 and will undoubtedly lead to a significant increase in demand, in the short term, in an already tight and under supplied market.

It is estimated that if online sales remain at close to these Covid levels, then up to 65 million sq ft of additional storage and distribution space will be required to support this increased consumer demand.

Grocery sales continue to perform well but have dipped slightly following the reopening of hospitality outlets as we would expect. Supermarket and online grocery delivery businesses do not carry any significant spare capacity and the short-term measures they have taken to scale up through store picking are not believed to be financially sustainable in the longer term. So, if only a small percentage of their new customers remained shopping online, then they will need to significantly increase order processing capacity, again resulting in the need for additional space.

A further consequence of the combined impact of Covid-19 and Brexit is the focus on ‘Reshoring’, with the UK government setting up Project Defend, which is looking to draw up a strategy to reduce our reliance on China for key imported goods. Over reliance on China for critical goods has been highlighted by the pandemic and comes at a time when the government are actively looking to diversify the country’s trading relationships. Our reliance on China – UK’s 2nd largest import market - is a concern for many businesses, who have found it difficult to turn on/off their supply chains due to the longer delivery time scales associated with goods manufactured in the Far East.

Linked to post Brexit Free Trade Agreements and concerns over disruptions of existing supply chains, by border/customs checks, occupiers are looking at the need to hold increased domestic inventory and Covid has added an unforeseen urgency to this planning.

**Regional and Local Market Overview**

The Yorkshire region is considered an established logistics location given its proximity to the national road network and immediate access to the M62, M18, M1 and A1(M) motorway corridors allowing occupiers to reach on average 75% of the UK population within a 4.5 hour drive.

As at August 2020 West Yorkshire and the Humber had a supply of approximately 1.9 million sq ft of units 50,000 sq ft across the region with 940,000 sq ft sq ft under construction.

South Yorkshire accounted for approximately 1.8m sq ft supply of units of all qualities 50,000 sq ft plus with a further 880,120 sq ft under construction, representing a vacancy rate of 2.4%

Yorkshire wide (including the Humber) take-up of units 50,000 sq ft totalled 3.3m sq ft in 2019. In 2020 H1 take-up is already at 3.65m sq ft, influenced by Amazons acquisition at Gateway 45 and there has been a strong start to H2 take-up.

The table below details specific transactions over 100,000 sq ft in the Yorkshire area during 2019 and 2020 for modern warehouse facilities. We have not included any take up of tertiary properties.
<table>
<thead>
<tr>
<th>LOCATION</th>
<th>SIZE (sq ft)</th>
<th>DEVELOPER / OWNER</th>
<th>OCCUPIER</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Doncaster South (Harworth)</td>
<td>150,000</td>
<td>Tritax Symmetry</td>
<td>Butternut Box</td>
</tr>
<tr>
<td>Markham Vale</td>
<td>102,000</td>
<td>Devonshire Group</td>
<td>X-Bite</td>
</tr>
<tr>
<td>Sheffield 336</td>
<td>336,000</td>
<td>Exeter Property Group</td>
<td>Royal Mail</td>
</tr>
<tr>
<td>Gilcar 31, Wakefield Europort</td>
<td>111,600</td>
<td>Private landlord</td>
<td>Hermes</td>
</tr>
<tr>
<td>Brookfields 200, Rotherham</td>
<td>197,245</td>
<td>Capital Land</td>
<td>Pricecheck Toiletries</td>
</tr>
<tr>
<td>Gateway 45, Leeds</td>
<td>2,000,000</td>
<td>PLP</td>
<td>Amazon</td>
</tr>
<tr>
<td>Premier Way North, Normanton</td>
<td>546,790</td>
<td>Exeter Property Group</td>
<td>The Range</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2019</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bessemer Park, Sheffield</td>
<td>134,000</td>
<td>PLP</td>
<td>TM Power</td>
</tr>
<tr>
<td>Gole 36, Goole</td>
<td>232,000</td>
<td>DB Symmetry</td>
<td>Croda Chemicals</td>
</tr>
<tr>
<td>Super G, Glasshoughton</td>
<td>259,236</td>
<td>Barwood Capital / Tungten Properties</td>
<td>Puma</td>
</tr>
<tr>
<td>iPort, Doncaster</td>
<td>731,000</td>
<td>Verdion / HOOPP</td>
<td>Amazon</td>
</tr>
<tr>
<td>TriLink 140, Wakefield Europort</td>
<td>142,388</td>
<td>Keir / Yorvale</td>
<td>CMS Distribution</td>
</tr>
<tr>
<td>West Moor Park, Doncaster</td>
<td>120,000</td>
<td>Clearbell</td>
<td>MH Star</td>
</tr>
<tr>
<td>Wakefield 31, Castleford</td>
<td>176,000</td>
<td>Broadland Properties</td>
<td>Torque Logistics</td>
</tr>
<tr>
<td>Brunel Road, Wakefield 41 Ind Est</td>
<td>134,000</td>
<td>Mayfair Capital</td>
<td>Card Factory</td>
</tr>
</tbody>
</table>

In addition to the above it is reported that contracts have been exchanged with a major national retailer on a 79-acre plot at Unity that will accommodate an 800,000 sq. ft. unit. This would be an addition to the above, but not yet recorded as a completed transaction.

Supply levels of existing buildings across the region continue to tighten. We are seeing a developer response to the reduction in supply with further speculative development being considered with the focus on sites which are readily available for development along key motorway corridors across the region.

Looking at demand, we are continuing to see good levels of enquiries and following easing of lockdown we have seen levels improve and are now actually ahead of 2019. Figures Below shows enquiries received for South Yorkshire by the Knight Frank Sheffield office.

![Image of graph showing enquiries by months](image-url)
In terms of active requirements at the larger end of the market, we highlight the following:

<table>
<thead>
<tr>
<th>ENQUIRY</th>
<th>SIZE REQUIREMENT</th>
<th>LOCATION</th>
<th>COMMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agent Led Requirement</td>
<td>12 – 20 acres</td>
<td>Doncaster</td>
<td>Specifically looking around the Doncaster area for land, ideally with planning consent. Timing Flexible.</td>
</tr>
<tr>
<td>Agent Led Requirement</td>
<td>100,000</td>
<td>Doncaster – Harrogate</td>
<td>Requirement for cold store facility. Looking at build to suit opportunities.</td>
</tr>
<tr>
<td>Agent Led Requirement</td>
<td>300 – 350,000 sq ft</td>
<td>Yorkshire</td>
<td>Project Flag – Yorkshire focussed requirement on behalf of pharmaceutical company. Existing or D&amp;B considered with delivery 2022.</td>
</tr>
<tr>
<td>Agent Led Requirement</td>
<td>400 – 600,000 sq ft</td>
<td>Watford to York</td>
<td>Requirement on behalf of ecommerce client – preferably looking for existing facility but will consider design and build.</td>
</tr>
<tr>
<td>Agent Led Requirement</td>
<td>300 – 400,000 sq ft</td>
<td>Yorkshire</td>
<td>Requirement on behalf of client for B8 use. Preference for existing accommodation where possible.</td>
</tr>
<tr>
<td>Leisure Company</td>
<td>200 – 300,000 sq ft</td>
<td>Doncaster</td>
<td>Longstanding Doncaster based occupier. Considering relocation and expansion.</td>
</tr>
<tr>
<td>Agent Led Requirement</td>
<td>45 acres</td>
<td>Doncaster / Goole</td>
<td>Footloose enquiry – looking for B2 manufacturer. Ideally looking for accommodation and able to offer up to 32 MW power capacity. Need good connectivity to East Coast Ports from Motorway Network.</td>
</tr>
<tr>
<td>Agent Led Requirement</td>
<td>300 – 500,000 sq ft</td>
<td>Yorkshire</td>
<td>Online retailer – preference for existing buildings but will also consider design and build.</td>
</tr>
<tr>
<td>Agent Led Requirement</td>
<td>250 – 350,000 sq ft</td>
<td>South Yorkshire</td>
<td>On behalf of occupier related to the food and beverage industry. Looking for distribution facility.</td>
</tr>
<tr>
<td>Agent Led Requirement</td>
<td>7 – 12 acres / 150,000 sq ft</td>
<td>South Yorkshire – Midlands</td>
<td>Project El Sala – requirement for freehold land or build to suit opportunities. Require 12m eaves. On behalf of plastic manufacturing company.</td>
</tr>
<tr>
<td>Undisclosed Clothing Manufacturer</td>
<td>150 – 300,000 sq ft</td>
<td>South Yorkshire</td>
<td>Currently based in South Yorkshire and looking at expansion opportunities.</td>
</tr>
</tbody>
</table>
As you can see there are a good number of active requirements. Many of the larger requirements are footloose in terms of location and may consider a wide geographical area which could include the whole of the region and wider areas in some cases.

Key drivers for attracting such occupational requirements include sites with deliverability to include an employment allocation and ideally outline planning consent within a location that is easily accessible to the motorway network and has good access to labour. Developer track record is also important.

We consider Gateway 180 to be a well-located site situated along the M18 corridor given its immediate access from the M180. Should the site be allocated, and outline planning consent secured, this coupled with Harworth’s track record and reputation, would present as a good opportunity to attract occupational interest.

### Update on current Supply

Reviewing the sites considered in the previous report which are available allocated sites in the borough with existing B1/B2/B8 planning consent and able to accommodate 100,000 sq ft + we provide the following updates:

<table>
<thead>
<tr>
<th>Agent Led Requirement</th>
<th>300 – 400,000 sq ft</th>
<th>Yorkshire</th>
<th>On behalf of food retailer, looking for low-density development for distribution of food products.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Confidential Garden Product Manufacturer</td>
<td>200,000 sq ft +</td>
<td>Doncaster – Goole</td>
<td>Possible consolidation of several sites. Would prefer Doncaster to Goole as a location.</td>
</tr>
<tr>
<td>Agent Led Requirement</td>
<td>25 – 35 acres</td>
<td>Yorkshire</td>
<td>On behalf of national retailer for consolidation of online fulfilment. Have five requirements nationwide and currently looking at options.</td>
</tr>
<tr>
<td>Manufacturing Company</td>
<td>170 – 300,000 sq ft</td>
<td>Nottinghamshire / Bassetlaw / Doncaster</td>
<td>Manufacturing company looking for additional space. Early stages linked with contract.</td>
</tr>
<tr>
<td>Civils Company</td>
<td>10 acres</td>
<td>South Yorkshire</td>
<td>Requirement around the South Yorkshire area – footloose in terms of location.</td>
</tr>
<tr>
<td>Aggregate Company</td>
<td>20 acres</td>
<td>Doncaster / South Yorkshire</td>
<td>Looking around the Doncaster / South Yorkshire area – need low site coverage.</td>
</tr>
<tr>
<td>Agent Led Requirement</td>
<td>500,000 – 1,000,000 sq ft</td>
<td>Midlands / Yorkshire</td>
<td>Early stage requirement for B2 use. Likely to progress late 2020 and consider options.</td>
</tr>
<tr>
<td>Manufacturing Occupier</td>
<td>150,000</td>
<td>Doncaster – East Coast</td>
<td>Manufacturer looking for presence in the area with a focus along the M18 as want proximity to the East Coast.</td>
</tr>
</tbody>
</table>
### IPort Doncaster, J3 M18 - (747)

**Overview**
IPort is a major and highly successful 334 acre (135 ha) intermodal logistics park developed by Verdion with funding backed by HOOPP, (Healthcare of Ontario Pension Plan). The scheme is well located off Junction 3 of the M18 motorway and has consent for over 6m sq ft of B1/B2/B8 industrial and distribution accommodation. The site benefits from direct access to the new Great Yorkshire Way which links the site to the M18 as well as to Robin Hood Doncaster Sheffield Airport, which lies approximately 4 miles away.

IPort also offers occupiers access to a dedicated 30-acre rail freight terminal on site allowing direct access to the UK rail network.

**Commentary**
Since the first phase of construction in 2016, there has been a total of approximately 2.4m sq ft let or sold with a further 731,000 sq ft committed within phase 2 representing over 50% of the total availability now transacted in only 4 years.

There are currently two speculatively developed units available extending to 195,000 sq ft and 119,060 sq ft respectively. Occupiers included Amazon, Lidl, Fellowes, Ceva, Kingsbury Press and Maritime Transport.

Over 50% of the site has been developed on over 4 years which is significantly faster than anticipated. In our view this is as a result of the sites strategic location, multi-modal offering, the developers track record and the fact that the site has been presented to the market fully serviced able to respond to occupational requirements swiftly.

**Update** - Whilst we understand that there have been good levels of interest in the site over recent months, there has been no change in availability.

**Total Site Area: 334 acres (135ha)**
**Maximum Building: 817,000 sq ft**
**Land Remaining: Approximately 144 acres (58ha)**
**Total Sq Ft Remaining: Approximately 2,796,960 sq ft**

### Aero Centre, Doncaster Sheffield Airport, J3 M18 - (748)

**Overview**
A large-scale mixed-use business park owned by Peel and offers industrial as well as offices and leisure opportunities on a design and build basis. The Business Park extends to 164 acre (66 hectare) with planning permission for buildings up to 250,000 sq ft suitable for manufacturing and distribution use. The Park also has Enterprise Zone status to help enable the economic potential in the site.

The Business Park is already home to occupiers such as BAE Systems, Marshall Aerospace, Europcar, APB Connect and Redline Aviation.

Trebor Developments acquired 5.66 acres in 2019 and were granted detailed planning consent for a speculative warehouse scheme consisting of two units existing to 58,159 sq ft and 45,876 sq ft. The build process is well underway and practical completion is due Q3 2020.

**Commentary**
Now under the banner of PLP (Peel Logistics Properties), the business park has the USP of being situated adjacent to the airport, it is located over 4 miles from Junction 3 of the M18. Whilst the Great North Road has improved access, from a logistics perspective, it is realistic to assume that an occupier would most likely take build to suit space at IPort as it is more established business park and is closer to junction 3 of the M18 motorway.
The area has historically secured companies looking for small to medium sized commercial premises, and we feel that this is where demand will continue. Policy 7 of the Local Plan envisages that the available allocated employment land will be of aimed at manufacturing and engineering sectors and specifically at aerospace and automotive industries and aviation related office uses.

Furthermore, some of the land previously earmarked for employment use has been promoted through the call for sites for housing (ref 940) and is designated as 940 E1/E2/E3 ‘proposed Housing-led mixed-use allocation within the Local Plan Policies Map 2015-2035.

Update - There is no change in availability here.

| Total Site Area: Approximately 164 acres (66ha) |
| Maximum Building: 250,000 sq ft |
| Land Available: 35 acres (14ha) (Gross) part of which is due to be developed out by Trebor. |
| Total Sq Ft Available: 613,000 sq ft |

| G Park, West Moor Park Extension, Armthorpe, J4 M18 - (1099) |
| Overview |
| GPark Doncaster is a Logistics Park owned by Gazeley (GLP) and consists of a new speculatively developed warehouse unit of 278,852 sq ft with a further 32 acres (13 ha) of fully levelled and plateaued land on Plot B which can accommodate up to a further 606,000 sq ft. The original site extended to approximately 126 acre (gross) with the first phase consisting of a single 915,848 sq ft warehouse developed for Next plc. |
| The site is well positioned with close links to Junction 4 of the M18 motorway as well as the main urban area of Doncaster and is the last remaining development opportunity within West Moor Park. |
| Commentary |
| West Moor Park is a well-established business park location and has attracted local, national and international occupiers over the years, namely IKEA, ASOS, ABP, Evergreen and Next Plc who took 916,000 sq ft from Gazeley in 2014. |
| Update - The developer completed the speculative development of 278,000 sq ft April 2019 which is being marketed to let. The remaining plot has simultaneously been plateaued and is now ready for immediate development capable of accommodating a single building of up to 606,000 sq ft. Optional layouts for Plot B are being reviewed. |

| Total Site Area: Approximately 50 acres (20ha) |
| Maximum Building: 606,000 sq ft |
| Land Remaining: 32 acres (13 ha) |
| Total Sq Ft Remaining: Approximately 884,000 sq ft |

| Land off Hatfield Lane (Gateway 4), Armthorpe - (818) |
| Overview |
| Gateway 4 is a well located prominent 30-acre (12ha) (gross) development site situated alongside the A630 and linking directly with Junction 4 of the M18 motorway. The site was acquired by Trebor Developments (backed with funding from Hillwood) in April 2019. Gateway 4 occupies a strategic distribution location situated within a mile of the M18 and Doncaster town centre is within 5 miles to the south west via the A630 Wheatley Hall Road. |
| Commentary |
| Detailed planning consent was obtained in November 2019 for the speculative development of a 409,000 sq. ft. unit. The unit benefits from 38 loading doors, 83 HGV spaces, 55m deep yard and 1MVA of power. |
Update - The developer has commenced speculative development and the unit is now at an advanced construction stage and is due for completion in late 2020.

<table>
<thead>
<tr>
<th>Total Site Area: Approximately 30.11 acres (12ha) (Gross)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum Building: Speculative development of a 408,916 sq ft warehouse</td>
</tr>
<tr>
<td>Land Remaining: 0 acres</td>
</tr>
<tr>
<td>Total Sq Ft Remaining: 408,916 sq ft</td>
</tr>
</tbody>
</table>

Riverdale Park, Wheatley Hall Road, J37 A1 (M) - (984)

Overview
112-acre (45ha) mixed use site owned by Harworth Group and situated in a prominent and established business park location, fronting directly on to Wheatley Hall Road (A630). The mixed-use site has outline consent to deliver employment, retail, leisure and roadside uses available on a build to suit basis.
Junction 4 of the M18 motorway is approximately 5 miles to the east, while the A1(M) is accessed, via the A635 to Junction 37, 4 miles to the west.

The site is situated directly opposite the established Wheatley Retail Park. In 2018, 6 acres (2.4ha) was sold to Arnold Clark for a 30,000 sq ft car supermarket. In 2019, 11.4 acres (4.6ha) of land was sold to Barratt Homes for 114 homes. Further residential land is to be released.

Commentary
As part of the wider mixed-use development totalling 112 acres (45 ha), there was approximately 25 acres (10ha) of employment land available.

7 acres (2.8ha) is fully remediated and ready for development and has secured occupier interest.
The remaining 18 acres (7.3ha) requires remediation which is proposed on a phased basis, of which the sites splits into parcels of 0.97 - 5.68 acres.

Due to its urban location and proximity to housing and roadside / retail uses, we anticipate that whilst the site could accommodate up to 200,000 sq ft in a single building, the employment allocation will be focussed on small to mid-size industrial development. This is likely to be driven by demand from the local and regional market given its location approximately 5 miles from the motorway network.

Update - There has been interest in smaller plots at Riverdale Park with discussions ongoing with occupier including Arnold Clark and two drive-thru operators. Furthermore, part of the site is now zoned for an alternative use, leaving small plots available up to 5.68 acres.
We do not consider this site a large scale industrial and logistics park and is likely to be developed out as small to medium sized units or plot sales.

<table>
<thead>
<tr>
<th>Total Site Area: Approximately 112 acres (45ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum Building: 100,000 sq ft</td>
</tr>
<tr>
<td>Land Remaining: 13.62</td>
</tr>
</tbody>
</table>

Unity Doncaster, J5 M18 - (418)

Overview
Unity Doncaster is a large-scale mixed-use regeneration project located off Junction 5 of the M18 owned by JV partners Waystone and Hargreaves Land. Work commenced on the construction of the new Hatfield Link Road in April 2019, which will release approximately 148 acres (60 ha) of employment land on a phased basis, called Unity Connect. Bespoke design and build warehouse and industrial space can be accommodated ranging from 30,000 sq ft up to 1m sq ft.

The wider Unity Project will provide 3,100 new homes, a new offline marina, school, transport hub and 80 hectares of open spaces.
Commentary
Unity Connect offers excellent access to the region's motorways via the M18 / M62 /M180 as well as the East Coast ports at Immingham, Hull and Grimsby. The site is also in close proximity to Doncaster Airport which is 10 miles to the South.

The completion of the new Hatfield link road will open the site and we understand that the developer will start to prepare development platforms, the extent of which is to be confirmed. The park will appeal to both B8 and B2 occupiers with the opportunity for significant power to site offering a USP to the market. The Hatfield link road is on site due for completion late 2020 which will open the site.

Update - Contracts have been exchanged with a major national retailer on a 79-acre plot that will accommodate an 800,000 sq. ft. unit. The largest building that can be accommodated following the land sale is 850,000 sq. ft.

Total Site Area: Approximately 160 acres (66ha)
Maximum Building: 850,000 sq ft
Land Remaining: 81 acres (32ha)
Total Sq Ft Remaining: Approximately 1.9m sq ft (in a various areas)

Nimbus Park, Phase II, Thorne, J6 M18 - (736)

Overview
Nimbus Park is a speculative development by Sladen Estates and AIG consisting of two logistics units extending to 164,366 and 106,509 sq ft. The site is well located prominently fronting the M18 and accessed via junction 6 at Thorne. The site also benefits from excellent connectivity to the region's wider motorway network via the M62 / A1((M) and M180, as well as access to the east coast ports. Nearby occupiers include The Range and BMW and Omega.

Notably the 23-acre (9ha) mixed use Henry Boot scheme (Thorne Park) located close the site was completed and fully let /sold recently consisting of around 160,000 sq ft of small and mid-size units as well as pub / retail and restaurant offering including Marstons, McDonalds, B&M and Aldi.

Commentary
The units were completed in April 2019 and have been marketed to let / for sale. There is no further development land available at Nimbus Park following the speculative development which has recently reached completion.

Update - It is widely reported that the 106,000 sq. ft. unit is under offer to Mosaic Tiles / Verona Group which is due to complete shortly which would leave a single unit of 164,336 sq ft available.

Total Site Area: Approximately 16 acres (6.5ha)
Maximum Building: 164,366 sq ft
Land Remaining: 0 acres (0ha)
Total Sq Ft Remaining: 164,336 sq ft

DHL, High Common Lane, Bawtry

Overview
A 27 acre site located off the A631 between Bawtry and Tickhill is home to c 615,000 sq. ft of existing accommodation occupied DHL Supply Chain as a distribution facility.

It is reported that DHL plan to vacate these premises as part of their relocation to a facility at Manton Wood, Worksop and the site is due to be marketed shortly or in part.

Commentary
The facility totalling c 615,000 is split across various buildings from 95,000 sq ft upwards.
The site is located off High Common Lane, which is in essence a single track back road with the sole purpose of serving the facility. Access to the A1(M) is a little convoluted with the nearest junction being Blyth at J34 which is some 4.5 miles south through the village of Harworth.

The accommodation here is of varying quality and is considered secondary in nature and is likely to be offered in part.

Land Remaining: 0 acres (0 ha)
Total Sq Ft Remaining: Approximately 615,000 sq ft

Conclusion

Having regard to the above, in our opinion, Gateway180 remains a good opportunity for a major employment site, under the control of established developer, Harworth Group who have an enviable track record in bringing forward strategic sites.

The industrial and logistics market has continued to perform well throughout the Covid-19 pandemic and in fact some of the structural changes we have seen across markets have indeed benefited the sector.

Whilst we acknowledge that sectors including automotive and aerospace are effectively in a deep freeze and we are yet to see the true impact of the pandemic on some businesses, the continued move to online retail is not going to be fully reversed.

As a result of COVID-19 we have seen years of growth condensed into a matter of months and we are confident that this will continue. Occupiers will need to adapt their supply chains and whilst there is a demise in the High Street, which will influence warehouse requirements, online retail typically requires significantly more warehousing space.

As highlighted above, if online sales remain close to COVID-19 levels, then a further 65,000,000 sq ft of additional storage and distribution space is anticipated to be required to support the increased consumer demand.

Having reviewed recent changes in supply and take up over recent months, we have calculated current available supply (able to accommodate 100,000 sq ft plus) as follows:

<table>
<thead>
<tr>
<th>Reference</th>
<th>Scheme</th>
<th>Total Sq Ft Remaining</th>
</tr>
</thead>
<tbody>
<tr>
<td>747</td>
<td>iPort, Rossington</td>
<td>2,796,960</td>
</tr>
<tr>
<td>418</td>
<td>Unity</td>
<td>1,900,000</td>
</tr>
<tr>
<td>818</td>
<td>Gateway 4</td>
<td>408,912</td>
</tr>
<tr>
<td>736</td>
<td>Nimbus Park, Thorne</td>
<td>164,336</td>
</tr>
<tr>
<td>1099</td>
<td>G Park, Doncaster</td>
<td>884,000</td>
</tr>
<tr>
<td>748</td>
<td>Aero Centre</td>
<td>250,000</td>
</tr>
<tr>
<td>984</td>
<td>Riverdale Park</td>
<td>200,000</td>
</tr>
<tr>
<td>984</td>
<td>High Common Lane</td>
<td>615,000</td>
</tr>
</tbody>
</table>

The above shows that based on the 2018 Colliers Employment Land Review figure, assuming the annual take up of approximately 70 acres (28 hectares) per annum or 1,200,000 sq ft, there is circa 6 year's supply of existing buildings and land allocated to accommodate units of 100,000 sq ft plus.
The schedule includes 1,775,000 sq ft of accommodation which is readily available for occupation or under advanced construction, which accounts for 1.48 years of supply. This is influenced by the availability at High Common Lane which has recently come to the market (615,000 sq ft). This is secondary / tertiary space and if this was to be disregarded as it is not Grade A, this results in there being less than 12 months’ supply of built Grade A accommodation available.

The gross developable area of both Aero Centre and Riverdale Park suggest much larger areas, but due to the size and configuration are limited to a maximum size building of just over 100,000 sq ft. Riverdale Park is more targeted towards the smaller and more medium end of the market, therefore we do not feel they compete directly with Gateway 180 and therefore the land supply is arguably less.

Only Gateway 4, which is being developed out speculatively (completion December 2020), Unity, G Park and iPort offer the opportunity to accommodate units of scale at present.

It is widely recognised that requirements linked with on-line retail often look for lower density sites to allow for additional car parking and loading which could put further pressure on land supply going forward, especially given the acceleration of online retail following the Covid-19 pandemic.

Following Covid-19 it is conceivable that annual take up could be greater going forward than that suggested in the Colliers Employment Land Review due to the acceleration in the move to online retail during the pandemic.

Retail figures have suggested that Covid-19 has accelerated the move to online, with levels during lockdown hitting those which were anticipated to be hit by 2025. Furthermore, the amount of space required to fulfil online retail sales is greater than that required to fulfil high street retail, typically 3 or 4 times greater predominantly due to the picking and packing and the handling of returns.

The increase in on-line retail has also had a positive influence on closely related companies such as the parcel carriers and packaging suppliers and manufacturers due to the resultant increase in the need.

Changes in market dynamics and requirements have also led to an increase in occupier land acquisitions (often to retain control) and design and build pre-lets at the larger end of the market to accommodate bespoke facilities. The latter is often only achievable once planning permission is granted, and a commitment made to service the site.

Gateway 180 is ideally located at Junction 1 of the M180 given its proximity and direct access to the M18 intersection. Whilst the site falls outside the boundary of the area which has been defined to apply the sequential test for B8 warehousing and distribution uses in the M18 corridor, given the direct access to the M18, occupiers considering the M18 corridor would not discount it on this basis. It is our opinion that it should firmly be considered part of the M18 corridor, which is an established industrial and logistics corridor within the South Yorkshire region.

Furthermore, the site is easily accessible to the M62 corridor where there has been a shortage of employment opportunities and also has direct motorway access to the East Coast ports unlike other employment sites which could result in the attracting inward investment from neighbouring North East Lincolnshire and East Riding.

Doncaster Metropolitan Borough Council are pro-active and understand the importance of B8 along with other uses for economic growth. It is widely recognised that the B8 sector provide a significant number of jobs across varying levels and skill bases.

It is important to allocate deliverable land which offers choice to the occupier market to accommodate growth from within the region and attract inward investment as take-up going forward will be directly influenced by availability and choice for the occupier.

Following Covid-19 it is conceivable that annual take up could be greater going forward than that suggested in the Colliers Employment Land Review due to the acceleration in the move to online retail during the pandemic.
The site presents an opportunity for a large-scale allocation immediately adjacent to the motorway network able to accommodate up to 2,600,000 sq ft, resulting in it being of national significance in terms of attracting both local and regional occupiers as well as footloose national requirements. Whilst there is land allocated in the borough for employment uses there are limited sites available that can offer a range of size units and units of such scale. It is equally apparent that there are limited sites capable of offering a single unit of 1,000,000 sq ft in the wider regional market.

Harworth Group are an established industrial and commercial developer, and should the accommodation be allocated employment and serviced and plateaued ready for development, we anticipate that the site would prove attractive to the market.

Yours sincerely

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Note: Any indication of value provided regarding indicative rents or achievable prices is provided for discussion purposes only. It is not, and is not intended to be, a valuation. We would be pleased to undertake the additional necessary research and provide a formal valuation, if required, on the basis of a separate instruction.
Appendix 2: DPL National Policy and Access
REPRESENTATION
TRANSPORT
GATEWAY 180
HARWORTH
<table>
<thead>
<tr>
<th>DOCUMENT QUALITY CONTROL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Number</td>
</tr>
<tr>
<td>Report Title</td>
</tr>
<tr>
<td>Issue</td>
</tr>
<tr>
<td>-</td>
</tr>
</tbody>
</table>

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FOR THE PLANET AND FOR THE FUTURE
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Appendices

None
1. **BACKGROUND**

1.1 **INTRODUCTION**

1.1.1 In considering the soundness of the Doncaster Local Plan – Submission Version 2015-2035 with regard to transport, it is important to first consider the relevant national policies which apply.

1.1.2 Within this section, highlighting of relevant paragraphs of policy with the use of a bold typeface is our own highlighting and not part of the original drafting of the policies.

1.2 **NATIONAL POLICY**

1.2.1 At the very core of national planning policy is achieving sustainable development. With regard to transport, the Framework dedicates Chapter 9 to ‘Promoting Sustainable Transport’.

1.2.2 Paragraph 102 of the Framework states:

> Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

a) the potential impacts of development on transport networks can be addressed;

b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;

c) opportunities to promote walking, cycling and public transport use are identified and pursued;

d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

1.2.3 When considering development proposals, Paragraph 108 of the Framework goes on to state that:

> In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users; and

c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

1.2.4 The context of the transport hierarchy is set out in Paragraph 110 as:

> Within this context, applications for development should:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating
access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;

c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;

d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and

e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

1.2.5 The Framework goes on to state in Paragraph 111 that:

All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

1.2.6 It is clear from Paragraphs 102, 108 and 110 that the transport hierarchy gives priority to vulnerable and active travellers and require that safe and suitable access to a site can be achieved for all users. Any proposals should provide a Travel Plan, in line with Paragraph 111.
2. LOCAL POLICY

2.1 BACKGROUND
2.1.1 The soundness of the plan requires consistency of local policies with national policy. As such, this section considers the pertinent local policies which are to be applied to development.

2.2 CORE STRATEGY
2.2.1 The adopted Core Strategy follows the requirements of national planning policy through Policy CS1: Quality of Life;

As a means to securing and improving economic prosperity, enhancing the quality of place, and the quality of life in Doncaster, proposals will be supported which contribute to the Core Strategy objectives, and in particular:

A) Provide opportunity for people to get jobs, learn new skills, and have access to good quality housing, local services, sport, leisure, religious and cultural facilities.

B) Strengthen communities and enhance their well-being by providing a benefit to the area in which they are located, and ensuring healthy, safe places where existing amenities are protected.

C) Are place-specific in their design and which work with their surroundings protecting and enhancing the built and natural environment, including green spaces, buildings, heritage assets, trees, waterways and public spaces.

D) Are accessible by a range of transport modes which offer choice, and are open and inclusive to all.

E) Protect local amenity and are well-designed, being: attractive; fit for purpose; locally distinctive; and: capable of achieving nationally recognised environmental, anti-crime and design standards.

Proposals should aim to follow all criteria, demonstrate how each objective has been considered and balanced against any other priorities, and is in accordance with all other relevant development plan policies.

2.2.2 Policy CS2B requires that distribution warehousing is located on the M18/ M180 corridor, however this is a broad requirement and does not override the core requirements of Policy CS1.

2.2.3 The principles set out in Policy CS1 are also reflected in Policy CS14, which requires development to be assessed to ensure that:

…the development proposed is robustly designed, works functionally, is attractive, and will make a positive contribution to achieving the following qualities of a successful place:

1. character – an attractive, welcoming place with its own identity appropriate to the area;
2. continuity and enclosure of streets and spaces by buildings;
3. quality, stability, safety and security of private property, public areas and the highway;
4. permeability – ease of pedestrian movement with good access to local facilities and public transport services;
5. legibility – a development that is easy to navigate;
6. adaptability – flexible buildings capable of changing over time;
7. inclusive – accessible development that meets the needs of as much of the population as possible;
8. vitality – creating vibrant, busy places with a mix of uses where appropriate; and;
9. sustainability – proposals are environmentally responsible and well managed.

**Existing Land Use**

2.2.4 The Core Strategy policies follow national policy in requiring that development is accessible by a range of transport modes which offer choice and are open and inclusive to all.

**LOCAL PLAN SUBMISSION**

2.3.1 With regard to the Local Plan as submission, the objective with regard to Transport and Accessibility is to:

> improve travel choice within the Borough and beyond to improve access to services and jobs, between communities and along key transport corridors, reducing the need to travel by car and ensuring new development is accessible to everyone.

2.3.2 Policy 2 of the Submission Plan goes on to confirm that:

> Major new employment sites will be focused in locations accessible from the ‘Main Urban Area’ and ‘Main Towns’ at locations attractive to the market with good access to the Strategic Transport Network as well as Doncaster Sheffield Airport.

2.3.3 With Policy 3 stating:

> at least 481 hectares of employment land over the plan period (2015-2035) to help grow and diversify the Sheffield City Region economy, increase productivity and widen access to learning and training opportunities. The identified land will accommodate business, light industry and manufacturing and distribution and warehouse uses to meet future employment needs on sites that are attractive to market investment and can be accessed via a range of transport modes. A number of sites are allocated which help meet the regeneration needs of the Borough;…

2.3.4 The requirements of Policy 3 are explained in Paragraph 4.27 as:

> The distribution of employment sites is required in market attractive locations but also ensuring that there is strong accessibility and connectivity between where people live and the employment opportunities. This is particularly important for the communities across the borough that have high levels of deprivation. Policy 13 sets out in more detail transport proposals with an emphasis on public transport and road improvements to improve access to jobs.

2.3.5 With the detailed requirements for transport set out in the Strategic Policy 14:

> Proposals are required to meet the following requirements:

**A) New development shall make appropriate provision for access by sustainable modes of transport to protect the highway network from residual vehicular impact.**

> 1. access to the development can be made by a wide choice of transport modes, including walking, cycling, and the private car, and public transport where appropriate;
> 2. site layouts and the street environment are designed to control traffic speed through an appropriate network and street hierarchy that promotes road safety for all;
> 3. walking and cycling are encouraged within the development and beyond, through the design of facilities and infrastructure within the site and provision of linkages to the wider network;
> 4. appropriate levels of parking provision are made in accordance with the standards contained within Appendix 6; and developments include provision for electric vehicle charging points, with fast charging infrastructure provided for use by short stay users where appropriate; and
5. development does not result in unacceptable impact on highway safety, or the severe residual cumulative impacts on the road network. Developers must consider the impact of new development on the existing highway and transport infrastructure. Where necessary, developers will be required to mitigate (or contribute towards) any predicted adverse effects on the highway and the wider transport network.

**B) New developments will need to** provide, as appropriate, Transport Statements, Transport Assessments and Travel Plans to **ensure the delivery of travel choice and sustainable opportunities for travel in line with the latest government guidance and best practice.** Thresholds for when these documents are required are set out in Appendix 7.

New developments that are predicted to have an adverse impact on the transport network will be expected to contribute towards capacity and mitigation measures. Proposals that require new projects will be required to make a proportionate financial contribution.

In addition, proposals should include details of post-development monitoring of traffic and mitigation measures in the event that traffic levels agreed through the original permission are later exceeded.

2.3.6 The policies set out above and which underline the submission Local Plan are considered to be consistent with national policy.
3. **SUSTAINABILITY APPRAISAL**

3.1 **INTRODUCTION**
3.1.1 This section considers the Sustainability Appraisal of the submission Local Plan against national policy and, accordingly, relevant Local Plan policies.

3.2 **SUSTAINABILITY APPRAISAL FRAMEWORK**
3.2.1 The Sustainability Appraisal Framework sets out the Objectives and how they will be achieved, with regard to transport in Table 4.1. These are set out under sub-objective Accessibility to Places, which requires:

- Ensure places can be accessed via public transport
- Encourage a modal shift
- Minimise travel to work distance
- Has footpath access where possible
- Has cycle paths where possible
- Has adequate parking facilities
- Has road access where possible
- Facilitate links between urban and rural areas

3.2.2 The objective for Accessibility includes significant disconnect between the Framework Policy 108B, 110A, 110B and 110C. National policy requires that priority is given to pedestrians and cyclists, the needs of people with disabilities and reduced mobility are addressed, safe and suitable access can be achieved for all users and that conflicts between vulnerable road users and vehicles are minimised.

3.2.3 In applying the Table 4.1 criteria, consideration must be given to safe and suitable access for all in order that the objectives can be consistent with national policy.

3.2.4 Table 4.5 sets out the Compatibility Matrices which are applied to the Scoring System for the Preferred Options. These can be summarised as:

- Compatible (positive);
- Incompatible (negative);
- Neutral; and
- Unrelated.

3.2.5 The Sustainability Appraisal forms Stage 4 of the Site Selection Methodology, which requires:

*All sites that have passed Stage 3 have been appraised using objective (where possible) criteria. This stage identifies any significant positive or negative effects (including cumulative effects) as well as the appropriate mitigation that would need to be addressed if a site is subsequently put forward for allocation.*

3.2.6 When considering sites, the Summary Sustainability Appraisal Findings assess each site in relation to transport using a limited number of criteria, those pertinent to employment are:

- Distance to a Train Station;
- Distance to Bus Stop (SYPTTE Core Network); and
- Access to Cycle Network.

3.2.7 The criteria are inconsistent with national policy, which requires priority for pedestrians and cyclists and the needs of people with disabilities and reduced mobility to be addressed.
3.2.8 Furthermore, the criteria give no consideration to whether distances are safe and suitable for all users which is, again, inconsistent with national policy.
4. SITE SELECTION

4.1 INTRODUCTION
4.1.1 Housing and Employment Site Selection Methodology & Results Report sets out how sites are selected, including utilising the Sustainability Appraisal, as discussed in the previous section.

4.2 MITIGATION
4.2.1 Paragraph 6.2.4 of the Site Selection Methodology states that:

*There are some sites where the Sustainability Appraisal process has still identified potential negative effects. Where it may be possible to mitigate the effects, then appropriate measures will need to be identified. Where a site with any negative effects has been taken forward as an allocation then these measures also form the basis of the site-specific development requirements and mitigation measures that will inform the future design and scale of the development within the Local Plan…*

4.2.2 There is a clear requirement for site-specific development requirements and mitigation measures to be identified and taken forward as measures to form the basis of site-specific requirements. As such, any site-specific policy wording must include those measures.

4.2.3 As the site selection methodology does not include a review of access for those with disabilities, reduced mobility or pedestrians, measures for these modes would not be included within the site-specific policy. As such, mitigation measures for these priority user groups do not form part of the Methodology and result in the methodology being inconsistent with the Framework policies 102, 108 and 110.

4.2.4 In addition, utilising only distances to assess the potential mitigation measures for a site excludes any measures which could be required to deliver safe and suitable access for all users. Again, this approach is inconsistent with the Framework policies 102, 108 and 110.

4.3 DETAILED ASSESSMENT CRITERIA
4.3.1 Appendix A3 of the Methodology sets out the Accessibility to Places criteria which are stated as having been applied in assessing Site Selection. For employment sites, these are set out below:

**Table 4.1 – Summary of Appendix A3 Accessibility Criteria**

<table>
<thead>
<tr>
<th>Mode</th>
<th>Notation</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rail</td>
<td>+</td>
<td>Site is within 800m of a train station</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>Site is located between 800m and 1.2km of a train station</td>
</tr>
<tr>
<td></td>
<td>-</td>
<td>Site is located over 1.2km from a train station</td>
</tr>
<tr>
<td>Bus</td>
<td>+</td>
<td>Site is within 400m of a bus stop on the high frequency bus network</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>Site is located 400m to 800m from a bus stop on the high frequency bus network</td>
</tr>
<tr>
<td></td>
<td>Site details</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Site is located over 800m from a bus stop on the high frequency bus network</td>
<td></td>
</tr>
<tr>
<td>Cycle</td>
<td>Site is within 100m of an identified cycle network</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Site is located beyond 100m of the identified cycle network</td>
<td></td>
</tr>
</tbody>
</table>

4.3.2 Despite the Framework requiring priority first to pedestrians and cyclists the Site Selection Methodology does not include pedestrians, nor does it consider a negative option for sites which are not reasonably accessible by cycle.

4.3.3 The Methodology only considers distance and not whether the safe and suitable access can be achieved. Manual for Streets provides a helpful context for interpreting distances. Manual for Streets states that:

4.3.4 The propensity to walk is influenced not only by distance, but also by the quality of the walking experience. A 20-minute walk alongside a busy highway can seem endless, yet in a rich and stimulating street, such as in a town centre, it can pass without noticing. Residential areas can offer a pleasant walking experience if good quality landscaping, gardens or interesting architecture are present.

4.3.5 A Methodology based upon distance alone results in an accessibility score being equal, whether the walk route is via a rich and stimulating street, or a busy highway.

4.3.6 This approach is inconsistent with the Framework policies 102, 108 and 110
5. THORNE NORTH

5.1 INTRODUCTION
5.1.1 This section considers the proposed allocation of Thorne North.

5.2 REASON FOR ALLOCATION
5.2.1 In relation to transport Thorne North site is proposed for allocation on the basis of:

... It provides an excellent job creation opportunity in the north of the borough and it will complement the successful existing industrial estates to the north of Thorne...

5.2.2 This statement ignores the significant severance caused between this site and the existing industrial estates to the north of Thorne by the M18 Motorway and its associated interchange to the south of the Thorne North.

5.2.3 The allocation has been made on the assumption that the Sustainability Appraisal and Site Selection Methodology are sound. The soundness of the criteria which have been utilised have been discussed above.

5.2.4 Table 6.36 of the Site Selection Methodology summarises the assessment of access to employment sites and is considered in more detail below.

5.3 RAIL ACCESS
5.3.1 Thorne North has been scored as a ‘0’ for rail access, which is the criteria for a train station to be within 800m and 1.2km of a site.

5.3.2 Thorne North sits at the boundary of the 1.2km walk distance from the boundary of the site, therefore falls at the very boundary of a scoring of ‘0’ for rail access. The actual walk route should be considered before the ‘0’ could reasonably be allocated.

5.3.3 The walk route between the site and the Thorne North train station and the site is described below. This assumes that the development proposals provide a footway around the northern section of the motorway interchange:

- Cross two high-speed unlit lanes of traffic on Selby Road to access an inadequate width footway;
- Travel for around 7 minutes (600m) on a substandard unlit footway with no separation between themselves and high-speed heavy vehicles on this unlit route;
- Cross three lanes of Selby Road at the high-speed motorway interchange with no priority proposed at all, waiting for gaps in high speed vehicles;
- Cross two high speed exit lanes from the roundabout across the motorway on-slip, with no priority given, waiting for gaps in high speed vehicles;
- Cross two high speed entry lanes forming the motorway off-slips, with no priority given, waiting for gaps in high speed vehicles;
- Cross two lanes of Paddock Lane, with no priority given, across the access route to a major industrial estate with significant heavy vehicle flows, waiting for gaps in the traffic, with restricted views up Paddock Lane, which is particularly detrimental for those with reduced mobility who may not be able to cross at the speed of an ambulant person.

5.3.4 Based upon the actual walk route between the site and the train station it is clear that there are a number of high-risk, high-speed conflicts that are present between a pedestrian and vehicles. The crossing of seven high-speed traffic lanes and motorway slip roads is unlikely to be attractive to most people and potential puts rail users in harm’s way.
5.3.5 Whilst a 1.2km distance could be considered accurate, the walking experience is of such poor quality and potential risk that allocating a ‘0’ is not considered to realistically reflect the accessibility of the site by rail.

5.3.6 Given the walking experience between the site and Thorne North railway station, the allocation of ‘0’ is considered to be flawed and not consistent with the Framework, most notably paragraphs 102C, 102E, 110B and 110C.

5.3.7 There are no mitigation measures which could materially improve the walking experience between the site and Thorne North railway station.

5.3.8 Based upon a true evaluation of the accessibility of the site and Thorne North railway station, the experience is a negative ‘-’ one and the Sustainability Appraisal is not considered to be either reasonable or robust.

5.4 DISTANCE TO A BUS STOP

5.4.1 Thorne North has been scored as a ‘-’ with regard to distance to a bus stop. As a result, it is expected that the site-specific policy for the site would require this negative to be addressed.

5.4.2 The development proposals for Thorne North could include mitigation to overcome the bus stop distance through the diversion of existing bus services to that site. This has one or more of four potential consequences:

- An additional bus is required to maintain the same frequency;
- The bus frequency reduces overall, potentially leading to reduced patronage along the route and/ or people choosing to travel by less sustainable modes;
- Travel time between Doncaster and Moorends and/ or Thorne increases for existing users, on what is already a long route. This could reduce the attractiveness of the route and lead to people choosing to travel by less sustainable modes; and/ or
- Areas currently served by Route 87 would no longer benefit from the service, requiring either other routes to also be amended and/ or people choosing to travel by less sustainable modes.

5.4.3 It is reasonable to conclude, therefore, that the issue of extending a bus service is potentially much farther reaching than simply paying a contribution towards such an extension as there could be a material impact on the existing users of the service, and other services, including additional delays and/ or areas which are currently served losing a service.

5.4.4 In order to consider the level of viability of diverting the service into the site, a review has been undertaken of the site promoter’s mode share information from their current planning submission. The applicant forecasts that the ‘adjusted’ mode share by bus from the site could be in the region of 4% of employees.

5.4.5 In order to forecast the potential revenues from bus patrons at the site, it has been assumed that the site is built out over approximately 10 years and a 10% build out per annum. The site is likely to be built out over a longer period, therefore this is an optimistic scenario. It has further been assumed that each passenger purchases 13 separate 28-day bus passes at a cost of £56 for 28 days (based upon the First4Week Doncaster ticket).

5.4.6 The low and high forecasts of 2,000 overall employees to 3,700 overall employees, as provided by the applicant, have been tested.

5.4.7 The forecast income can reasonably assessed against the approximate annual cost of running a single bus of £180,000, which allows consideration of the shortfall by year and cumulatively.
Table 5.1 Forecast Bus Patronage – Thorne North

<table>
<thead>
<tr>
<th>Year</th>
<th>Employees</th>
<th>Bus Patrons (4%)</th>
<th>Revenue (£)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Low</td>
<td>High</td>
<td>Low</td>
</tr>
<tr>
<td>1</td>
<td>200</td>
<td>370</td>
<td>8</td>
</tr>
<tr>
<td>2</td>
<td>400</td>
<td>740</td>
<td>16</td>
</tr>
<tr>
<td>3</td>
<td>600</td>
<td>1110</td>
<td>24</td>
</tr>
<tr>
<td>4</td>
<td>800</td>
<td>1480</td>
<td>32</td>
</tr>
<tr>
<td>5</td>
<td>1000</td>
<td>1850</td>
<td>40</td>
</tr>
<tr>
<td>6</td>
<td>1200</td>
<td>2220</td>
<td>48</td>
</tr>
<tr>
<td>7</td>
<td>1400</td>
<td>2590</td>
<td>56</td>
</tr>
<tr>
<td>8</td>
<td>1600</td>
<td>2960</td>
<td>64</td>
</tr>
<tr>
<td>9</td>
<td>1800</td>
<td>3330</td>
<td>72</td>
</tr>
<tr>
<td>10</td>
<td>2000</td>
<td>3700</td>
<td>80</td>
</tr>
</tbody>
</table>

5.4.8 If the full development were to be built out within 10 years, the cumulative shortfall in operating a single additional bus during the build-out could be in the region of £1.2M to £1.5M. This shortfall could be significantly higher if the development is built out over a period of more than 10 years.

5.4.9 There could be a residual shortfall of between £120,000 and £70,000 per annum with the development fully built-out.

5.4.10 With almost no safe access to the site on foot, by cycle or for those with a disability, a bus service would be critical for accessing the site by sustainable modes and, even then, could result in just 4% of all employees accessing the site by sustainable modes.

5.4.11 It is not clear how a viable service which does not materially affect existing bus users could access the site.

5.4.12 There appears to be no viable measures to deliver a bus service to Thorne North, which is inconsistent with the requirements of the Framework paragraphs 102C, 108A, 108B, 110A, 110B and 110C.

5.4.13 In addition, no site-specific policy could appear to reasonably overcome the issue of access by bus, which would be a requirement of Paragraph 6.2.4 of the Site Selection Methodology.

5.5 ACCESS BY CYCLE

5.5.1 Thorne North has been scored as a ‘+’ with regard to access to Cycle Network. This allocation relates to a site within 100m of an identified cycle route network.

5.5.2 When considering an identified cycle route network it must surely be the case that the cycle route provides access to reasonable and local destination and that cyclists could be expected to cycle along that route. These are basic criteria which must be met, otherwise access to the ‘cycle’ route network cannot reasonably be considered to be achieved.
5.5.3 The Doncaster cycle map is interactive and can be accessed via the council’s website. In the text accompanying the document it states:

*Every route shown on the map has been cycled and evaluated and many of the advisory routes marked have been suggested by local cyclists.*

5.5.4 An extract from the ‘cycle’ route network for Thorne is shown below:

*Extract 5.1 ‘Cycle’ Route Network*

5.5.5 In order to interpret the cycle route network, the network key is shown in the extract below:

*Extract 5.2*

5.5.6 It can be seen that Selby Road and the motorway interchange are highlighted as green dashed which is “path or footway where you should walk your bike”. Whilst there is no description to explain why a cycle should be ‘walked’, it is reasonable to consider the high speed of vehicles on this route, combined with the high proportion of heavy vehicles has been evaluated as unsafe for cyclists to use the carriageway.
5.5.7 On the basis of cycles needing to be ‘walked’ for around 1km to the south of the site there is considered to be no safe cycle access to Thorne or Moorends from the site. As such, the positive site appraisal for cycles is considered to be incorrect and should be amended to a negative.

5.5.8 For completeness, there are ‘advisory’ routes shown to the west of Selby Road. These can be seen to provide access to no significant conurbation within a reasonable cycling distance.

5.5.9 There are no mitigation measures which could materially improve the cycling experience between the site and Thorne or Moorends.

5.5.10 Based upon a true evaluation of the cycle accessibility of the site, the experience is a negative one and the Sustainability Appraisal is not considered to be either reasonable or robust.

5.6 THORNE NORTH SUMMARY

5.6.1 The Site Selection Methodology has been shown to be inconsistent with the Framework for those with a disability, reduced mobility and pedestrians. Even if these were included within the Methodology, the score for Thorne North should be negative as it would require pedestrians to cross nine traffic lanes, of which seven are on high speed routes.

5.6.2 There is considered to be no safe access to Thorne North by these user groups.

5.6.3 The positive scoring for access to a train station within the Site Selection Methodology ignores the walking experience described above and, as a result, is considered to be inconsistent with the Framework and the appropriate score would be negative.

5.6.4 The negative scoring for access to a bus stop within the Site Selection Methodology is correct. A review of the potential bus patronage from Thorne North suggests that the long-term guarantee of a bus service to the site may be unviable.

5.6.5 The positive scoring for access to the cycle route network is considered to be either incorrect or inappropriate. The cycle route map shows that for Selby Road and the motorway interchange cyclists should ‘walk’ their cycle, i.e. that using the carriageway is unsafe. The scoring should be amended to negative, in light of the unsafe cycle access which is available.

5.6.6 Overall, the selection of Thorne North based upon the Site Selection Methodology is flawed and inconsistent with national policy as the accessibility ratings ignore the high-speed and high-risk conflicts that those with disabilities, reduced mobility, pedestrians, cyclists and rail users would be required to endure to access the site.
6. CONCLUSION

6.1 SOUNDNESS OF TRANSPORT ACCESS

6.1.1 Harworth consider that the Evidence in the Local Plan are not justified and does not provide an appropriate strategy. The Plan in its present form could fail to deliver sustainable development in accordance with the policies in the Framework and is not consistent with national policy.

6.1.2 In these circumstances, Harworth do not consider that the Doncaster Local Plan in its Submitted form is sound.

6.1.3 However, Harworth consider that the plan can be made sound subject to the proposed changes as set out in the following sub section. Harworth will continue to work with the Council to develop appropriate modifications to the Local Plan.

6.2 PROPOSED CHANGE

6.2.1 To overcome the objection and address the soundness matters raised herein, Harworth consider that the following modifications should be made in respect of transport.

- The Site Selection Methodology for employment sites should include access by those with disabilities, reduced mobility and pedestrians, in line with national policy and Local Plan policies CS1, CS2B, CS14 and the overarching Local Plan objective with regard to Transport and Accessibility;
- Actual user experiences should be assessed within the Site Selection Methodology, including severance and the safe and suitable access by the assessed mode;
- The positive scoring for Thorne North in respect of rail and cycle access should be amended to a negative scoring in light of the evidence provided; and
- Alternative employment sites with safe and suitable access for all should be reassessed and the Site Selection updated to reflect these changes.
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