Examination of the Doncaster Local Plan

Harworth Group Plc
Rossington (Site Ref 247) (Representor Ref 05205)
Conisbrough and Denaby (Site Ref 1035) (Representor Ref 05205)

Hearing Statement
in relation to
Matter 2 – Quantity of Development needed in the Borough

September 2020
Introduction / Context

1. This Statement is submitted on behalf of Harworth Group Plc (‘Harworth’), specifically in relation to land in which it has an interest at Rossington Colliery and Denaby Main.

2. This Statement provides Harworth’s response to the Inspector’s Matters, Issues and Questions (INSP4) for consideration during the forthcoming hearing sessions. Harworth does not intend to participate in the hearing session in relation to Matter 2 and understands that these written comments will carry the same weight as any comments made orally.

3. This Statement relates to Matter 2 regarding ‘Quantity of Development needed in the Borough’ in particular, the following questions which are replicated ahead of Harworth’s response.

Question 2.1

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

Harworth Response

4. Harworth supports the strategic aim of the Plan to provide a substantial quantum of land for business (B1), general industry (B2) and storage and distribution (B8) uses. The case made by Harworth in relation to its Bradholme Farm site is supported here, which is that up-to-date evidence on employment land take-up and demand indicates that a greater quantum of land should be allocated, which is suggested to be a minimum annual requirement of 31.5ha, and that the M18/M180 corridor should be the principle location for regionally significant employment sites able to accommodate large floorplate (‘big box’) premises for logistics and manufacturing use.

5. In relation to Harworth’s site at Denaby Main, the primary concern relates to the distribution of the employment land across the Borough (which is addressed under Matter 3) and the lack of provision of smaller employment sites to meet local need. However, this is inter-related with the strategic aim and the quantum of land to be allocated for employment uses.

6. Harworth’s position is that besides the allocation of new large-scale employment sites located on the motorway network, an allowance also needs to be made for the allocation of smaller sites for employment uses at the Main Towns, particularly to the west of the Borough.

7. The provision of sufficient employment land to allow allocation in such locations is essential to achieve inclusive economic growth and to contribute to the regeneration.

8. In relation to the Main Towns, Harworth considers the strategic aim of Policy 3 not to be justified and positively prepared. The policy wording indicates that ‘the identified land will... meet future employment needs that are attractive to market investment and can be accessed via a range of transport modes’, yet development for logistics, light industry and manufacturing is directed only to sites with ‘good access to the M18/M180 motorways and strategic road network’ irrespective of scale and nature of the development able to be accommodated and the local need or benefits.

9. The implication of this strategic approach is that there are no allocations made to accommodate relatively small-scale development for logistics, light industry and manufacturing use at the Main Towns, particularly in the west of the Borough. This approach is not justified when considered against reasonable alternatives and is not
positively prepared insofar as it does not meet the need for local employment and regeneration in the Main Towns to the west of the Borough.

10. Harworth therefore considers that Policy 3 is not sound. As per our preceding representations, the strategic aim and detail of Policy 3 needs to be changed to allow allocation of sites at the Main Towns for light industry and manufacturing use (including ‘small scale distribution’) specifically in location that are within and accessible to the existing town. Our suggested change is underlined in the Policy 3 table extract below:

<table>
<thead>
<tr>
<th>Location</th>
<th>Employment</th>
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<tbody>
<tr>
<td></td>
<td>Light Industry &amp; Manufacturing</td>
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<tr>
<td></td>
<td>Rail and manufacturing, particularly</td>
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<tr>
<td></td>
<td>advanced manufacturing</td>
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<tr>
<td></td>
<td>Local employment (including small scale distribution).</td>
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<tr>
<td></td>
<td>Low carbon and “green industries”</td>
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<tr>
<td></td>
<td>(including renewable energy)</td>
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<tr>
<td>Main Towns</td>
<td>As Doncaster Main Urban Area.</td>
</tr>
<tr>
<td></td>
<td>Locations within and accessible to the existing town</td>
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<tr>
<td></td>
<td>Unity (Hatfield Power Park and associated business parks)</td>
</tr>
</tbody>
</table>

11. As indicated above, Harworth has made the case (in relation to its Bradholme Farm site) that up-to-date evidence justifies the allocation of a greater quantum of employment land, and is required to make the policy sound.

12. Harworth also considers that changes to the use classes order and associated permitted development rights that will take effect in September 2020 may increase the loss of floorspace in employment use to other uses, and that this is most likely to be premises of smaller sizes and located within or accessible to existing towns. Accordingly, it is in these locations where additional employment allocations of an appropriate scale and nature should be made.

13. On the basis of such a strategic change being made and there being a requirement to identify additional/alternative sites, Harworth suggests that Site 1035 be favourably considered given the positive contribution its development will make to local employment and regeneration at the Main Town of Conisbrough and Denaby.

14. For reference, Site 1035 is promoted by Harworth for employment (in part) and housing (in part) given its location adjacent to both existing employment and housing areas.

**Question 2.6**

Is the strategic aim in Policy 3 to facilitate the delivery of 18,400 new homes in the period 2015 to 2035 (920 dwellings per year) justified and positively prepared? In particular:

a) Is it appropriate to plan for a higher figure than the standard method indicates (585 homes per year)?

b) Are the economic growth assumptions upon which the strategic aim of 18,400 new homes is based aspirational but deliverable between 2015 and 2035?
c) If such economic growth were to materialise, would it be likely to affect demographic behaviour to the extent that an additional 335 homes are needed every year between 2015 and 2035 (on top of the 585 per year that the standard method indicates are needed)?

d) Do previous levels of housing delivery in the Borough indicate a need for more than 585 homes per year?

e) Should the Plan aim to deliver more than 585 homes per year in order to help meet the need for affordable homes?

Harworth Response

15. Harworth supports the strategic aim of the Plan to deliver 18,400 new homes over the period 2015-2035 and considers that the Council is justified in planning for a relatively high level of housing growth on the basis of economic growth.

16. As per our comments in response to Question 2.1 (above), Harworth advocates a change to the quantum and strategic distribution of land allocated for employment uses to facilitate development at the Main Towns, particularly those to the west of the Borough, and with that achieve local employment and regeneration.

17. On this basis it is appropriate for the housing growth directed to the Main Towns, and in particular Conisbrough and Denaby, to be at the higher end of the range indicated in Policy 3.

18. Should additional or alternative housing sites be required to achieve this (following examination of those proposed to be allocated by the Council), then Harworth suggests that Site 1035 be favourably considered given the positive contribution its development will make to meeting housing need and facilitating economic growth and regeneration.

19. For reference, Site 1035 is promoted by Harworth for employment (in part) and housing (in part) given its location adjacent to both existing employment and housing areas.