1. Question 8.2 Are each of the employment allocations with planning permission listed in Tables E1 to E8 likely to be developed during the Plan period as assumed in the Plan?

1.1 Employment allocations with planning permission comprise by far the largest single element of the employment supply of the Local Plan, some 42%, and therefore the adequacy of this source warrants careful consideration. In this context we are concerned that: a) there is evidence to suggest that in practice a significant element of these sites will not be delivered during the plan period; b) a substantial element of this source is no longer truly available having been developed or sold/let and not available to meet future demand in the true sense; and c) in any event, these sites do not tend to fully address the predominant type of employment land need identified over the plan period.

a) Deliverability/Developability Issues

1.2 Our Publication Draft Local Plan representations in respect of Policy 3 of the Local Plan stated that a 10% discount (20 hectares) should be applied to the planning permission sites to allow for unforeseen constraints in respect of their deliverability/developability.

1.3 This position remains as a starting point, but in addition, since submission of those representations we have carried out further research in relation to these sites, which is set out in the attached note by industrial agents, Dove Haigh Phillips (DHP) (Appendix 1). The note shows that:

- Some sites are likely to have deliverability issues associated with low values/viability because they are in marginal market locations;

- Some sites are reliant on other uses producing higher return and anchoring of kick starting the development, such as retail that are of questionable future viability themselves.

- Some sites have ownership constraints.
1.4 DHP estimate that in the light of these known constraints approximately 14 hectares of sites with planning permission will not come forward within the plan period. Given that further unforeseen constraints may occur over the plan period this supports the application of the 10% discount we sought in our Publication Draft representations.

b) Availability Issues

1.5 A concern we identify in our Matter 2 Statement is that a significant element of the employment land supply within the Local Plan is already either built or committed to a particular occupier. This is particularly the case in relation to Iport (Site 747) and Unity (Site 418). The note by DHP at Appendix 1 demonstrates that of the 158 hectares of land at Iport with planning permission only 42 hectares remains available. Similarly, of the 33.6 hectares allocated with planning permission within the plan period at Unity, only 1.6 hectares is available. In total DHP estimate that of sites with planning permission, only 117 hectares remains available, which is considerably less that the 201 hectares refered to at Para 4.61 of the Local Plan.

1.6 Para 8 of the NPPF states that one of the economic objectives of the planning system is to ensure that sufficient land of the right type is available in the right places and at the right time. In quantitative terms our Matter 2 Statement identifies a trend of high levels of take-up of employment land in Doncaster since the beginning of the plan period (at a rate above that currently provided for in the employment supply of the plan), and we have provided evidence within that statement that indicates that take-up has been exacerbated by Covid-19/Brexit factors.

1.7 Whilst it is is positive that Doncaster is proving to be an attractive location for industrial investment, we are concerned that we are only a quarter of the way through the plan period yet a substantial proportion of the supply (over 40%), of which the largest component is sites with permission, is already taken up and/or committed. This considerably reduces the quantum of land that is available to potential occupiers over the remaining 15 years of the plan period, and increases the risk that Doncaster will miss out on investment and job creation that could otherwise occur if the plan provided for more employment land, as sought in our Publication Draft representations in respect of Policy 4.

1.8 Availability of employment land supply will be negatively impacted further if the plan period is extended by a year to provide for a 15 year supply on adoption of the plan as we recommend in our Matter 1 Statement.
c) Employment type required

1.9 Our Matter 2 Statement shows that over 70% of employment land expected to be required over the plan period will be for B8 development, and of this a very large proportion (271 hectares) will be needed for strategic warehousing i.e. large sites close to motorway junctions. However, it can be seen that a large number of the employment sites with planning permission are either too small and/or in the wrong locations for warehouse development.

1.10 Furthermore, there are very limited opportunities available to provide for occupiers that require strategic warehousing facilities - since the plan period started a significant element of Unity (Site 418) has already been taken up by Home Bargains (32 Ha) and is no longer available, and land available at Iport (Site 747) has been substantially diminished. We therefore consider that employment planning permissions will make an inadequate contribution to the ‘type’ of employment land most needed over the remainder of the plan period. We estimate that land available, suitable and deliverable for strategic warehousing development (Sites 818/1099/418/747/733/836) with planning permission amounts to only 96 hectares.
2. Question 8.4 Are each of the employment allocations without planning permission listed in Table 4 suitably located and likely to be developed during the plan period as assumed in the Plan?

2.1 No.

2.2 At Publication Draft stage we submitted comments in respect of a number of proposed allocations in the Local Plan. We summarise our position on these sites taking into account the note by DHP attached at Appendix 1 and the note by Sandersons at Appendix 2.

Site 001 – Thorne North

2.3 When properly applied Thorne North fails the flood risk sequential test given the availability of a significant amount of suitable land in FZ1 at West Moor Park East (Site 937/1031). Approximately half of the West Moor Park East site, split along a line parallel with the motorway is FZ1 and capable of development on its own in practical terms. We also attach at Appendix 3 representations sent to the Environment Agency expressing concern about the allocation of Thorne North site, and highlighting the fact that it was subject to widespread flooding in the November 2019 floods. In our Matter 3 Statement we also note that failure to properly apply the flood risk sequential test was a concern identified by the withdrawn Doncaster Sites and Policies DPD Inspectors Report.

2.4 As explained in our Matter 1 Statement, Thorne North has poor bus (and train) accessibility and no detailed proposals have been provided by the promoters of the site as to how public transport will be improved and funded. The site is is over 800m from a bus stop in a remote location and bus services are infrequent. Highways England comments on the application require public transport improvements and details of funding, but the Transport Assessment does not provide this information. In the absence of such details the site is unsuitable for an employment allocation in respect of accessibility.

2.5 Para 4.31 of the Local Plan indicates that Thorne North has been selected as part of a strategy to ensure regeneration is spread across the Borough. However, this is not an effective or justified strategy if selected allocations do not comply with national policy on flood risk or they are not deliverable. In this context Thorne is not a first tier location for strategic warehousing compared to M18 Juncions 3 and 4. It is also not well related to Doncaster or a large local labour force. Furthermore, Highways England comments on the planning application for Thorne North limit
the quantum that can be brought forward pending a review of traffic capacity at Junction 5 of the M18 – the outcome of which is not presently known.

2.6 Given the constraints it is considered that at best a lesser amount of land (approximately 37 hectares) could be developed at Thorne North during the plan period than anticipated by the Plan. There are good reasons for not allocating the site at all. This is consistent with the delivery concerns expressed within the Council’s 2018 Housing and Employment Site Selection Methodology and Results Report about the deliverability of this site, and also identified within the Colliers Employment Land Review.

Site 441 - Carcroft Common

2.7 When properly applied Carcroft Common fails the flood risk sequential test given the availability of a significant amount of suitable land in FZ1 at West Moor Park East (Site 937/1031). Approximately half of the West Moor Park East site, split along a line parallel with the motorway is FZ1 and capable of development on its own in practical terms. We also attach at Appendix 3 representations sent to the Environment Agency expressing concern about the allocation of Carcroft Common, and highlighting the fact that it was subject to widespread flooding in the November 2019 floods. In our Matter 3 Statement we also note that failure to properly apply the flood risk sequential test was a concern identified by the withdrawn Doncaster Sites and Policies DPD Inspectors Report.

2.8 Carcroft Common is a former UDP employment allocation from the mid 1990s (UDP adopted 1998) which has been carried over into the Local Plan for somewhat inchoate regeneration reasons as we refer to in our Matter 3 Statement. Para 4.31 of the Local Plan confirms that land in the north of the Borough tends to have low values, poor accessibility and flood risk issues. Regeneration might be an objective of the Council, but allocation choices are not justified if they conflict with national policy on flood risk, nor are they effective if there are significant doubts about their deliverability, as is the case here.

2.9 There are considerable doubts about the deliverability of Site 441 due to its poor accessibility and very poor accessibility to the road and particularly the motorway network – a matter that the plan acknowledges the allocation is effectively contingent upon. Para 4.31 of the Local Plan confirms that the prospects of the site are dependent on the delivery of a new link road between the A1M and A19. However, the note by Sandersons at Appendix 2 shows that there is little or no evidence of progress for the A1/A19 scheme. There is no clarity of corridor identification,
environmental assessment, land ownership constraints and more importantly funding mechanisms – each of which are critical stages to the provision of a major piece of infrastructure such as a link road with a motorway. There is therefore no evidence of a reasonable prospect that the scheme can be delivered during the plan period and hence we have no confidence that Carcroft Common can be brought forward. The allocation of this site is not likely to be effective.

Site 092 – Balby Carr Bank

2.10 The main challenge to the delivery of Site 092 is considered to be the poor access to and approach via the Balby Carr Road/Bolton Road junction. In any event, this site is too small and too remote from the motorway network to help address the considerable need for B8 warehousing development we identify in our Matter 2 Statement, in particular for strategic warehousing.

Site 258 - Lakeside, Potteric Car Road/Middle Bank

2.11 The availability of this site is not known. Regardless, the site is too small and too remote from the motorway network to help address the considerable need for B8 warehousing development we identify in our Matter 2 Statement, in particular for strategic warehousing. The allocation may be suitable for small scale industrial use however.

Site 878/1032 – East of Bankwood Lane, Rossington

2.12 This site is already occupied by an existing and longstanding business named Tanks and Vessels. It is not a new employment site and its development for Class B uses will require relocation of the existing business which itself will take up other employment land elsewhere if it were ever to happen – details of how this will be achieved are not provided within the Local Plan or the evidence base. The site should more properly be designated as an Employment Policy Area where existing uses can be protected rather than an allocation. It will not deliver a new gain in employment land for Doncaster.

Site 941 – Land East of Poplars Farm, Hurst Lane, Auckley

2.13 The contribution of Site 941 to economic activity in Doncaster will be closely linked to the airport and its fortunes, which are currently facing an uncertain future due to the impact of Covid-19. The site is located adjacent to another site (44 hectares) which has been reserved for airport-
related business and is recognised not to contribute to the Bouroughs general employment land needs, but in practical terms it is difficult to distinguish it from this site.

2.14 Site 941 is not in a prime motorway location and it does not have good access to labour. It is not a first tier location for strategic warehousing compared to M18 Junctions 3 and 4.

2.15 Given these factors, we consider that Site 941 will only deliver 50% of the output which has been identified within the Local Plan and even this is as likely to be airport related (and not count to general needs) as not.

2.16 Having regard to the above, our Matter 2 Statement shows that over 70% of employment land expected to be required over the plan period will be for B8 development, and of this a very large proportion (271 hectares) will be needed for strategic warehousing i.e. large sites close to motorway junctions. However, we consider that employment allocations will make an inadequate contribution to the ‘type’ of employment land most needed over the remainder of the plan period. We estimate that allocations available, suitable and deliverable for strategic warehousing development (Site 001) amount to only 36.80 hectares.
3. **Question 8.5** – Collectively, will the employment allocations and employment policy areas be sufficient to meet anticipated needs over the Plan period and provide enough flexibility to accommodate needs not anticipated?

**Will employment allocations and employment policy areas be sufficient to meet needs?**

3.1 No.

3.2 In our Matter 2 Statement we identity a need to increase the employment requirement of the Local Plan due to the following factors:

- The national policy requirement to provide a ‘minimum’ 15 year supply of employment on adoption of the Local Plan. This increases the requirement from 481 to 505 hectares.

- The trend of greater take-up of land than provided for by the employment requirement figure of the Local Plan.

- The effect of Covid-19 and Brexit, which are driving higher levels of demand for Class B8 space, which in turn takes up large sites and greater amounts of land, relative to other B class uses. Our Matter 2 Statement proposes a 10% buffer to the land requirement to take account of these factors. This is conservative as an approach.

3.3 In the light of the above our Matter 2 Statement states that the employment land requirement of the Local Plan should be increased to 555 hectares\(^1\), which provides for an annual figure that is more in line with the long term average take up rate in Doncaster.

3.4 The table set out at Para 4.61 of the Local Plan shows that as presently drafted the plan provides for 482 hectares of land (just 1 hectare more than the requirement). Even assuming that all of the employment allocations are deliverable (which we do not - please refer to our response to Question 8.5) it is therefore clear that employment allocations will be insufficient to meet the needs of the Plan. Whilst the Council refers to an additional supply of smaller sites within employment policy areas within its Employment Land Supply Buffer Note, most of these sites are very small in size (as small as 0.26 hectares) and their developability is unknown because they have not been assessed as part of the Local Plan process.

\(^1\) This takes account of the need to provide for an extra year in the requirement to deliver a 15 year supply, and reflects the 10% buffer we propose in light of Covid-19/Brexit factors.
3.5 Given the above, we consider that there is likely to be a considerable quantitative deficit in land that is deliverable over the plan period against needs. The employment supply of the plan is not justified or effective in that regard.

3.6 Furthermore, the issue is not just a ‘quantitative’ one. In our responses to Question 8.2/8.4 and in our Matter 2/3 Statements we explain that that a significant priority for employment land needed over the plan period is for B8 warehousing, in particular strategic warehousing with good access to the motorway network. However, the type of employment land provided by the Local Plan is inadequate to meet this specific need and therefore fails to accord with the economic objective of the planning system that sufficient land of the right type is available in the right places and at the right time. The Local Plan provides for very limited opportunity for strategic warehousing sites close to the motorway network that are available, and hence it will not meet the need in ‘qualitative’ terms in addition to the quantitative issue we refer to above. The sites that are promoted are in Flood Zone 3. The simple solution is to allocate at least the FZ1 part of the West Moor Park East site, that is partly previously developed, on a motorway junction, accessible to a significant population likely to work there and in a well established location in terms of market attractiveness.

**Will the plan provide enough flexibility to accommodate needs not anticipated?**

3.7 In our Publication Draft representations we object to the omission of an employment land supply buffer or any reserve employment sites within the Local Plan to reduce the risk that the ‘minimum’ 481 hectare target is not met, and to ensure that the plan is sufficiently flexible to adapt to unforeseen circumstances. Given our response to the first part of Question 8.5 above regarding the inadequacy of the base supply in quantitative and qualitative terms, our concerns about the lack of flexibility in the employment land supply are magnified.

3.8 The Local Plan does not provide for a clear deliverable buffer of employment land to take account of unforeseen economic circumstances, the evidence of which we are living through now. It only aims to allocate sufficient (we say it fails even in this aim) sites to just meet the requirement of 481 hectares, which we consider to be an inadequate starting point in any event (please refer to the reasoning above). Whilst the UDP provided for reserve employment sites, and the Local Plan provides for reserve ‘housing’ sites, no such reserve provision is made for employment land in the plan. We consider this to be a significant and unjustified omission.
3.9 Whilst the Council have attempted to respond to representations regarding the lack of flexibility within the Employment Land Supply Buffer Note, our Matter 2 Statement considers each of the claimed buffer sources. Our assessment of these sources can be summarized as follows:

- **Flexibility in-built within 481 hectare employment requirement** - the adjustments made within the requirement calculation in relation to churn/vacancy competition and choice/losses are perfectly normal and necessary adjustments when calculating an employment requirement. None of this obviates the need for a buffer for unexpected events.

- **Certain allocations have the capacity for additional land after the plan period** - the Thorne North planning application indicates that development on this site will be limited until a wider assessment of traffic capacity at Junction 5 is carried out, thus casting uncertainty on how much land this proposed allocation can deliver. Carcroft Common is fundamentally constrained by the need for a link between the A1M and A19. It is unclear what land is available for future development at Unity following the announcement that Home Bargains will acquire a very significant element of this site. The reality is that the beyond the plan period land will have to be accelerated, just to stand still in terms of truly available supply. The Askern Saw Mills site is very small in size and constrained in relation to land ownership.

- **Supply available from employment policy areas** - most of these sites are very small in size (as small as 0.26 hectares) and their developability is unknown because they have not been assessed as part of the Local Plan process.

3.10 In short, we do not consider that the Employment Land Supply Buffer Note provides clear or compelling reasons why the Local Plan should not provide for greater flexibility in the employment land supply. Our client’s proposed employment allocation at West Moor Park East (937/1031) can help provide for this additional flexibility.
APPENDIX 1

NOTE BY DOVE HAIGH PHILLIPS
West Moor Park East

Local Plan Examination Draft Hearing

Question 8.2 – Are each of the employment allocations with planning permission listed in Tables E1 to E8 likely to be developed during the Plan period as assumed in the plan?

We address each of the sites in table E1 to E8 and make comments as appropriate below;

Table E1 – Main Urban Area

1.1 **984 - Former McCormick Tractors**, now known as Riverdale Park. This is a recent outline consent subject to reserved matters. It is very much a mixed scheme and the commercial element of the site is being promoted for 200,000 sq ft of commercial space to be built out by 2026. It is therefore likely to make some contribution of small scale commercial units (not large scale manufacturing or distribution). The current promotional literature for this site is attached at Appendix 1.

1.2 Assuming plot density of 50% for the 200,000 sq ft being promoted (to allow for some 2 storey element), we would expect a land requirement of 3.71 ha, not 9.50 ha. It is therefore unlikely that 9.50 ha will be developed in the plan period, because this would deliver a significantly larger amount of commercial floorspace (circa 500,000 sq ft), than the amount being stated of 200,000 sq ft. We therefore anticipate that there may be some shift in proposed uses from employment to roadside / residential uses due to the micro location in a mixed use / residential area (these uses will deliver higher value to the developer).

1.3 **1096 – Land at Marshgate.** A mixed use scheme with only a small amount of employment land identified. A dated permission and as there has been no activity and this site is also reliant on retail development, it is considered is likely to be unviable (as retail development at present would be regarded as economically unviable) and therefore unlikely to deliver 2.40 ha.

1.4 **1098 – Land off Little Lane.** A recent permission and only small scale development. No obvious reason why this should not be developed
1.5 **1101 – Parkside Industrial Estate.** Developed by St Modwen, it is our understanding that this has been fully developed and therefore the 4.91ha has already been committed and is not available as new supply for the future.

1.6 **1110 – Marshgate Depot.** A site owned by the Council. Poor location, no sensible demand for employment uses in this location and we consider it unviable and not capable of delivering 1.45ha throughout the plan period.

**Table E2 – Armthorpe Area**

2.1 **818 - Land off Hatfield Lane.** A recent permission in an established employment location and reasonable prospects for development.

2.2 **1099 - Land South of Holme Wood Lane** – As above although a slightly more dated permission.

**Table E3 – Duncroft Dunsville and Hatfield Area**

3.1 **418 – Unity.** It has been confirmed that a sale has been agreed for 79 acres / 32 ha of land to a national retailer (understood to be Home Bargains and to be used for distribution purposes) – see Appendix 2. This land is therefore committed already which only leaves 1.60 ha out of the 33.60 ha stated for future development in the plan period (and even this may not be possible – it may just be some buffer land associated with the agreed sale). It is acknowledged that there is additional land identified for employment development on this site, although it is unknown whether this is reliant on different infrastructure which may be contingent on other events in the longer term.

3.2 Irrespective of the potential for additional employment land on this site, it is evident that almost all of the stated supply for the Local Plan contribution has been committed at a much quicker pace than anticipated. This therefore also contributes to a reduction in choice for potential occupiers in the market.
Table E4 – Rossington Area

4.1 **747 – Land West of West End Land, Rossington (iPort).** There are currently 2 buildings available to let at i-port; one extending to 195,000 sq ft and another extending to 119,000 sq ft. According to the website, the masterplan (April 2020) has capacity for an additional 2,502,900 sq ft of built development. Assuming a ground floor footprint of 50%, this would indicate that 115 acres / 41.93 ha of land remains available for development. This is a significant difference from the 158 ha stated in the Plan. As with site 418 above, it indicates that the majority has gone and there is only a small amount remaining for the remainder of the duration of the Plan period. This is shown in Appendix 3.

Table E5 – Thorne Area

5.1 **733 – Capitol Park, Omega Boulevard, Thorne.** No reason why the 2.20 ha should not be developed throughout the plan period.

5.2 **736 – Land and Buildings on the north side of Lands End Road, Thorne.** No reason why the 7.28 ha should not be developed throughout the plan period.

Table E6 – Askern Area

6.1 **569 – Askern Saw Mills, High Street, Askern.** A heavily contaminated site which we also understand is subject to a long running family dispute. It has been on and off the market for around the last 20 years. It is a poor location with very limited demand in this location. It is considered very unlikely that 2.27ha would be developed for industrial use throughout the plan period.

Table E7 – Auckley and Hayfield Area

7.1 **748 – Doncaster Sheffield Airport.** Speculative development has commenced on at least 2.3 ha. No reason why the remainder of the site should be developed throughout the plan period. However the available area is now therefore 10.87 ha due to the sale of land from Peel to Trebor which is currently being developed out on a speculative basis. (There may also be potentially a shift in consent from employment to residential use although this is not confirmed at present)
7.2 **1100 – Blaxton Quarry.** This is a former quarry which we understand has been on and off the market for the past 10 years. It is a former quarry which has a number of site constraints, however a recent planning application submitted in November 2019 indicates that there is intent to develop / use part of the site for employment purposes and it is therefore likely to deliver 3.00ha of employment land within the Plan period.

Table E8 – Edlington Area

8.1 **743 – Broomhouse Lane Industrial Estate, Edlington.** A dated original consent from 2012 but with an amendment granted in April 2017. A small amount of land extending to 0.74 ha. This should be available for employment use throughout the plan period.

Summary

9.1 The table below summarises the analysis of the sites we have undertaken with planning permission. We set out where we have identified land is either unviable or unavailable and also analysis of available land from the sites stated in Tables E1 to E8.

<table>
<thead>
<tr>
<th>Site</th>
<th>Unviable / Unavailable (ha)</th>
<th>Available or Deliverable in Plan period (ha)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>984</td>
<td>5.79</td>
<td>3.71</td>
<td>Mixed use scheme including residential and roadside uses. Suitable for small / medium sized units, not distribution warehousing. Suburban location not motorway corridor.</td>
</tr>
<tr>
<td>1096</td>
<td>2.40</td>
<td>0.00</td>
<td>Dated permission and reliant on retail. Highly unlikely to be viable and therefore not capable of delivering the stated area in the plan period.</td>
</tr>
<tr>
<td>1098</td>
<td>0.00</td>
<td>2.53</td>
<td>Small scale development and not motorway corridor</td>
</tr>
<tr>
<td>1101</td>
<td>0.00</td>
<td>0.00</td>
<td>Area already developed and therefore no further supply in the Plan period</td>
</tr>
<tr>
<td>1110</td>
<td>1.45</td>
<td>0.00</td>
<td>Council owned, a poor location and no sensible demand for employment development in this location. Site is considered unviable for employment development.</td>
</tr>
<tr>
<td>818</td>
<td>0.00</td>
<td>12.61</td>
<td>No reason why this site will not be developed throughout the Plan period.</td>
</tr>
<tr>
<td>1099</td>
<td>0.00</td>
<td>30.43</td>
<td>No reason why this site will not be developed throughout the Plan period.</td>
</tr>
<tr>
<td>418</td>
<td>0.00</td>
<td>1.60</td>
<td>Significant amount of land already sold and committed leaving very little (if any at all throughout the plan period).</td>
</tr>
<tr>
<td>747</td>
<td>0.00</td>
<td>41.93</td>
<td>Current marketing material indicates that capacity remains for just over 2.5m sq ft on site which we calculate equates to 41.93ha of land</td>
</tr>
<tr>
<td>733</td>
<td>0.00</td>
<td>2.20</td>
<td>No reason why this should not be developed in the plan period.</td>
</tr>
</tbody>
</table>
9.2 The Doncaster Local Plan Publication Draft dated June 2019 states that from sites with planning permission (data as at 1st April 2018), the anticipated land supply is 201 ha (4.61).

9.3 The analysis above demonstrates that we have identified that of the sites with permission, 14.21 ha is unviable or undeliverable, however of significant importance, the analysis shows that as at September 2020, only 116.90 ha remain available from this supply for employment development.

9.4 This analysis therefore demonstrates that 42% of this land has been taken up within circa 28 months, and leaves only 58% of the supply from this source for the next 15 years of the life of the Plan.

9.5 In particular, there is very little well located land remaining available from the above supply which leaves very limited choice for prime large scale sites on motorway corridors adjacent to existing and established junctions. These are the type of sites which are most attractive to the market and sought after by occupiers and investors.

<table>
<thead>
<tr>
<th>Site</th>
<th>Available</th>
<th>Committed</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>736</td>
<td>0.00</td>
<td>7.28</td>
<td>No reason why this should not be developed in the plan period.</td>
</tr>
<tr>
<td>569</td>
<td>2.27</td>
<td>0.00</td>
<td>Poor location, contaminated site and long running family dispute, hence highly unlikely this site will be available for development in the Plan period.</td>
</tr>
<tr>
<td>748</td>
<td>2.30</td>
<td>10.87</td>
<td>2.30ha already committed</td>
</tr>
<tr>
<td>1100</td>
<td>0.00</td>
<td>3.00</td>
<td>A recent planning application indicates this will be developed for employment but this is not a motorway location and the planning application relates to use as a crane storage yard.</td>
</tr>
<tr>
<td>743</td>
<td>0.00</td>
<td>0.74</td>
<td>A small area of land suitable for small units only.</td>
</tr>
<tr>
<td>Total</td>
<td>14.21</td>
<td>116.90</td>
<td></td>
</tr>
</tbody>
</table>
Question 8.4 – Are each of the employment allocations without planning permission listed in Table 4 suitably located and likely to be developed during the Plan period as assumed in the Plan?

Table 4

10.1 **001 Thorne North, M18 Junction 6.** Existing buildings close to this location have been developed slowly over a 20 year period and this reflects a modest pace of investment and occupier commitment. This is dramatically different to the pace of development recently achieved at West Moor Park and iPort. The site is not well located to the main urban area of Doncaster, and has a limited catchment population to provide a local labour force to support such a large scale opportunity. Thorne is a very modest settlement in itself.

10.2 The site is in single ownership and a planning application has been submitted. The application has been undetermined for a significant number of years. The site is not being actively promoted at present and objections have been submitted to the planning application on grounds including transport, accessibility, flood risk and also the sequential approach.

10.3 Since the application was lodged over 4 year ago, in August 2016, Highways England have consistently recommended that planning permission should not be granted owing to concerns relating to traffic modelling methods and the capacity of the Strategic Road Network. Network Rail also have highways-related concerns in relation to potential impact on nearby level crossings. Recent consultation responses also highlight that the Council hold landscape impact concerns, especially given the height of buildings and their proximity to neighbouring residents. Yorkshire Wildlife Trust also have issues with the scheme relating to potential impacts upon protected and priority species at the Thorne and Hatfield Moors SPA. From a market perspective, the site would be regarded as unattractive.

10.4 We refer to the comments made in our report dated 30 September 2019 (pages 15-16); “Thorne cannot be regarded as an established distribution hub” and “The Colliers Employment Land Report also confirms (Page 22, Section 4.1 – para 5) that the site is ‘more remote’ location from the main urban area of Doncaster that some of the other LP review sites’. Colliers also state that they would anticipate only 50% of the entire site (which equates to 73.63ha) could be developed out within the Plan period, thus equating to a net contribution of 36.8ha. This is at odds with the stated contribution towards the Local Plan Requirement of 51.54 hectares. In particular, we note that in the ‘Doncaster Employment Land Review – amendments to be made in
light of the Local Plan Informal Consultation Stage undertaken in September-October 2018’, Colliers state again that they only anticipate 36.8ha is likely to be developed out in the plan period (this is despite some negative commentary being deleted from the site description).”

10.5 For the reasons set out above, it should not be assumed that the Thorne North site could supply the amount of land (51.54 ha) identified within the plan period and we concur with Colliers that a much more realistic amount is ‘at best’ 36.8ha leaving a shortfall of 14.74ha from this site.

11.1 **092 Balby Carr Bank, Balby.** This site is located 1½ miles south of Doncaster town centre. It is served by Balby Carr Bank and several side roads. This provides direct egress to A630 within 500 m however this is a one way junction. Access to the site from Doncaster town centre therefore involves a 3 mile circular route.

11.2 To the south of the site is an operational sewage works. To the west and south west are extensive residential areas which are sensitive to industrial uses but do not have direct access to the site and do not allow direct access to local labour.

11.3 The site is within the ownership and control of a major industrial occupier and experienced developer. The main challenge on delivery is expected to be the poor access to the surrounding residential areas at the Balby Carr Road/Bolton Road junction,

11.4 Delivery of the site will be dependent on achieving better access to Balby Carr Road and enhancing access from surrounding residential areas, and will be of very modest scale in any event.

12.1 **258 Plot 1, Lakeside, ‘Potteric Carr Road’ / Middle Bank.** This site is located 1 mile south of Doncaster town centre and is served by the A6182 and A18. However it is not on Potteric Carr Road but is situated to the north of the intersection of Stadium Way and Middle Bank. The surrounding area is a mixed business environment and nearest motorway access is Junction 3 of the M18 approximately 2 miles to the south.

12.2 Lakeside is a well-established area of Doncaster, and this site may be suitable for smaller B1/B2 style buildings. However it is highly unlikely that offices will be developed on the site in the short term as it will not be economically viable. It is a modest site with a stated contribution of 5.00ha.
12.3 It is understood that this site is owned by Doncaster Metropolitan Borough Council (as part of a much wider ownership). There does not appear to be any pro-active promotion of the site. According to the DMBC website, the site is ‘part under offer / part available’ but this may refer to land already sold and details are vague.

13.1 **441 Carcroft Common, Carcroft.** The site is located 6 miles from Doncaster town centre via the A19 and then following an extended route over 2 miles via the B1220 through a residential area. It is stated as having a gross area of 49.28ha, with a Local Plan contribution of 12.32 ha.

13.2 The site is situated to the east of the Bentley Moor Industrial Estate area. It is not a large format location, due to its remote position from the motorway network. The main occupier on the estate is a vehicle dismantler and it has access to small local labour force only.

13.3 The Doncaster ELR states that ‘the site requires major road infrastructure investment to open it up for development and, in particular, the A1M to A19 link road’. Therefore, a viable access to this site simply does not exist, and it is also likely to require a shift to higher value uses or development funding in order to justify the cost of development due to the cost of initial infrastructure work.

13.4 As a consequence of the issues identified above, the site would not be attractive to the market and also in practical terms it cannot be considered suitable to contribute towards the Local Plan requirement. Therefore the stated area of 12.32 ha should be discounted.

14.1 **878/1032 Site A, East of Bankwood Lane, Rossington.** The site is 4 miles south west of Doncaster town centre and served via Junction 3 of the M18 although then has awkward access through a mixed residential and commercial area. The area identified for Local Plan contribution is 17.68ha.

14.2 It is adjacent to a scrap metal recycling yard and close to a local authority recycling centre and various other secondary mixed industrial units.

14.3 The site has been in the market ‘on and off’ for at least 10 years and is currently occupied by Tanks and Vessels (and has been for around 40 years). It comprises an existing industrial building and storage land with an existing Rateable Value of £221,000. Part of the site is within Flood Zones 2 and 3 and the north eastern part of the site is vulnerable to flooding.
14.4 The vast majority of the site was identified in the adopted 1998 UDP and has not been developed further since this allocation. Any new development on the site would necessitate existing business relocation of a long standing operation incurring significant cost and disruption.

14.5 For the reasons stated above, this site cannot be considered to deliver any new net gain and the stated area of 17.68ha towards the Local Plan allocation should be discounted.

15.1 941 – Site 2, Land East of Poplars Farm, Hurst Lane, Auckley. The site is just under 8 miles via primary road to the south east of Doncaster town centre and is bound by the Great north Road (A638) and High Common Lane. The stated area for the Local Plan contribution is 68.54ha.

15.2 This has now obtained outline permission, granted in May 2020, giving a little more certainty that the site will progress, although we still question the amount of land in this location which will contribute towards the supply of employment land in this location.

15.3 The site forms part of the masterplan for Doncaster Airport and will be reliant on the growth of airport business. It is also adjacent to another site (44.05ha) which has been reserved for airport related business (which is not identified as a contribution to the Local Plan requirement). Although the site is close to the airport it is quite remote from labour.

15.4 Although part of the airport masterplan, this is a significant additional area of land in this location which has been identified for employment uses and it is considered that this is an excessive amount compared to realistic market absorption in this area, due to the availability of land with an existing permission, the micro location, proximity to labour and also the uncertainty and difficulties facing the aviation industry as a result of Covid-19. Its future contribution is likely to be very closely linked to the airport and its fortunes. It is difficult to distinguish it in practical terms from the adjacent site that is formally reserved for airport uses and not part of employment land supply.

15.5 Given the scale of this site, and the factors stated above, we anticipate that there will be a shift of uses away from employment, and therefore a more realistic amount to consider is 50% of the total which has been identified (34.23 ha).
16.1 The table below summarises the analysis of the sites with employment allocations (and also including site 941 which now has an outline permission).

<table>
<thead>
<tr>
<th>Site</th>
<th>Stated Area (ha)</th>
<th>Available or Deliverable in Plan period (ha)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>001</td>
<td>51.54</td>
<td>36.80</td>
<td>This site cannot be regarded as a distribution hub and has consistently received a number of concerns. Colliers Employment Land Report also consistently states that a reduced amount of land would be more suitable and therefore, this is the area which has been adopted in the table as deliverable in the Plan period. The area of 36.8ha must also be considered as an 'at best' figure.</td>
</tr>
<tr>
<td>092</td>
<td>8.60</td>
<td>8.60</td>
<td>Established industrial area, although development of the site will be reliant on better road access. Suitable for smaller scale development and not a motorway location.</td>
</tr>
<tr>
<td>258</td>
<td>5.00</td>
<td>5.00</td>
<td>Established employment area, although this site is not being actively promoted. Any development on here will be relatively small scale and not large format distribution. Not a motorway corridor location.</td>
</tr>
<tr>
<td>441</td>
<td>12.32</td>
<td>0.00</td>
<td>Site requires major road infrastructure. Remote location and access via a tortuous route, and proximity only to local labour force. The site cannot be considered as viable for employment supply for the Plan period.</td>
</tr>
<tr>
<td>871/1032</td>
<td>17.68</td>
<td>0.00</td>
<td>The site is already in use by a local business and has been for 40 years. It represents no new supply towards the Plan allocation.</td>
</tr>
<tr>
<td>941</td>
<td>68.54</td>
<td>34.23</td>
<td>The site has now gained an outline permission (May 2020), but nevertheless the amount of land identified in this location for contribution towards the local plan supply has to be challenged. It is difficult to distinguish this site from an adjacent site which has been reserved for airport related businesses (44.05ha on that site) and although identified as an employment area it is likely to also be reliant on the fortunes of the airport. It is not a prime motorway location.</td>
</tr>
</tbody>
</table>
corridor location and for this and the other reasons stated, a contribution of 50% of the stated area is considered much more reasonable.

| Total  | 163.68 | 84.63 | 79.05ha shortfall |

16.2 Analysis of the sites from the table above therefore demonstrates that there will be a shortfall in supply of 79.05ha, from the sites with employment allocations (and including site 941 now with an outline planning permission). Again this confirms that there is very limited choice for prime large scale sites on motorway corridors adjacent to existing and established junctions sought after by occupiers and investors.
Question 8.5 – Collectively, will the employment allocations and employment policy areas be sufficient to meet anticipated development needs over the Plan period and provide enough flexibility to accommodate needs not anticipated?

17.1 There will be a shortage of sites with employment allocations and planning permission capable of delivering the amount of land identified for employment use within the remainder of the Local Plan period. In particular there will be a shortage of prime land and therefore insufficient land within the plan period for large sites adjacent to motorway junctions which are the most attractive to developers and investors in the region. There certainly will not be any buffer for unknown eventualities and there should be.

17.2 A recent sale of 32ha of land at site 418 (Unity) to a national retailer has committed a significant amount of land at this location, and based on the stated contribution of 33.6ha from this site, suggests that only 1.36ha (out of the Local Plan total) is available for contribution to the Local Plan total. It is acknowledged that there may be potential for additional land to come forward at this location, however this may be contingent on third party factors which may be unachievable in the medium term. It should however be noted that the commitment to this site from a national retailer for distribution purposes does confirm without question the market attractiveness of the M18 corridor as one of the prime locations for employment land this region.

17.3 In a similar manner, according to the current promotional website for i-port, the masterplan (April 2020) has capacity for an additional 2,502,900 sq ft of built development. Assuming a ground floor footprint of 50% for built development, this would indicate that 114.92 acres / 41.93 ha are available. This demonstrates that a significant amount of land at this location has already been committed and again a very limited supply for the remaining 15 years of the Local Plan period.

17.4 We have also identified a number of sites where land is considered unviable or undeliverable throughout the Plan period.

17.5 In summary, our analysis indicates that only 116.90ha remain available from the sites with planning permission for the remainder of the plan period. As at April 2018, the amount of land identified from this source was stated to be 201ha. Therefore, 42% of this land is committed just two years later and only 58% remains available for the next 15 years of the plan. This is likely to prove inadequate.

17.6 It is also highly unlikely that all the sites with a draft allocation will be capable of delivering the amount of land identified for employment use within the Local Plan.
17.7 Site 001 (Thorne North) is the subject of a 4 year old planning application, the site has constraints and may also be subject to highway concerns over the capacity of development it can deliver. The stated area of 51.54 ha cannot be relied upon as a robust figure for supply of employment land from this site, and at best, a figure of 36.8ha is more realistic. This is repeatedly stated by Colliers, on behalf of the Council, in the Employment Land Reports.

17.8 Site 441 Carcroft Common is reliant upon a very uncertain major infrastructure scheme and otherwise has tertiary access and is not an attractive location to the market. It is considered highly unlikely that the stated area of 12.32 ha will be delivered in the Local Plan period.

17.9 Site 878 / 1132 is already in use by Tanks and Vessels. It does not therefore contribute any net gain and the stated area of 17.68 ha should be discounted.

17.10 The land at Site 941, East of Poplars Farm is stated has been identified as a contribution of 68.54 ha. Although this site now has an outline planning permission, given the proximity of adjacent land with consent and the reliance on aviation associated industries, this is a particularly ambitious target in this location. A much more realistic amount of land to come forward from this site is around 50% (34.23 ha).

17.11 In summary, there must be significant doubt over reliance on the amount of land identified from the sites identified with draft allocations. Analysis of the sites with an employment allocation and site 941 demonstrates that the aggregate total of the land from sites 441, 878/1132 and 941 which is available / deliverable in the Plan period is 84.63 ha, resulting in a shortfall of 79.05ha from this supply during the Plan period.

17.12 Therefore, the cumulative total of land which remains available for the next 15 years supply is only 201.53 ha (116.90ha; Table at 9.1 above + 84.63 ha; Table at 16.1 above).

17.13 The 20 year plan requirement is 481hectares (or approximately 24.05ha per annum). Therefore based on the analysis above, the remaining amount of land represents just over 8 years supply. This demonstrates a clear shortage of employment land for the remainder of the Plan period which is 15 years. We therefore calculate that an additional amount of good quality employment land would be required to satisfy demand over remaining life of the Plan.
17.14 This is compounded by the lack of prime large scale motorway corridor sites which are the most attractive to occupiers in the region for a very significant proportion of the land requirement. The smaller suburban sites satisfy local / small business needs, but major investors in the region require prime land, in order to satisfy occupational, logistical and funding requirements.

17.15 It must also be relevant to highlight the change in market dynamics which has been influenced by the Coronavirus pandemic. This has accelerated the decline of the traditional retail sector and whilst a ‘bounce back’ may be forthcoming for parts of the retail property market, it is now acknowledged that the sector will contract due to the popularity of e-tailing.

17.16 This will lead to greater demand for traditional distribution hubs and ‘last mile’ hubs; the most popular locations for the former being prime high profile motorway junctions which are well established and popular with existing occupiers. This determines market attractiveness and these locations will be those which are successful in enticing occupiers / employers to a particular site.

17.17 Sites / land which are located in areas which are in need of investment or regeneration will not succeed for major large scale investment if they are unattractive to occupiers or developers, because market forces will prevail above political desire. For these reasons, the Local Plan must identify more land which is suitable for modern and future employment requirements and adapt to be flexible to accommodate sites which are most appropriate for the required use.
Appendix 1 – Site 984 Current Promotional Material
Regeneration of major site with waterside location

Riverdale Park

KEY HIGHLIGHTS

Location
Doncaster, South Yorkshire

Development Size
112 Acres

Planning Consent Received
2016

Housing Plots Consented
600

Commercial Space Consented
200,000 sq ft
Overview & Vision

The regeneration of the former McCormick Tractor site into a mixed-use major development will create a range of opportunities for residential, retail and employment alongside the riverbank and Wheatley Hall Road.

Home of the former McCormick Tractor factory, Harworth purchased the 112-acre industrial site in December 2015 and later secured outline consent to deliver a mixed-use scheme that will comprise 600 new homes and 200,000 sq ft of commercial space to be built out by 2026.

The masterplan capitalises on the site’s prime road frontage where the proposed commercial and retail uses will be focussed, in addition to positioning the residential plots alongside the river frontage to create a desirable waterside living location.

Development Progress

Following acquisition, all buildings and structures that remained on site have now been demolished and a programme of extensive remediation and earthworks has been ongoing to create the first parcels of serviced land for sale. These works also include installing utilities, drainage and infrastructure to the site.

At the start of 2018, the first parcel of land (around 6-acres) was sold to Arnold Clark to build a new 30,000 sq ft car showroom with construction starting on-site shortly.

Just 12 months later, in 2019, a second plot of land – the site’s first residential plot – was sold to Barratt Homes to build 191 homes over 11.4 acres with construction currently ongoing.
At the start of 2020, a second retail plot was sold to Costa Coffee for the build out of a Drive-Thru unit at the site’s main entrance, with work starting in June and expected to complete towards the end of the year.

**Development Gallery**

First Phase of New Homes Under Construction

_Barratt Homes are currently on-site building out the first 191 family homes, named 'Park Edge'. _
Opportunities & Enquiries

Further parcels of land identified in the masterplan for residential development will be marketed for sale as the wider scheme progresses. Commercial plots are available for employment, trade, roadside, retail and community uses on either a freehold land sale or leasehold design and build basis and can accommodate units of up to 135,000 sq ft. Please contact the Development Manager with all enquiries.
Appendix 2 – Site 418 Press Release
CPP secures sale of significant plot at South Yorkshire development site.

Leading property consultants Commercial Property Partners (CPP) has secured the sale of a 79-acre plot at a major mixed-use regeneration scheme in South Yorkshire to an unnamed national retailer.

CPP represented clients Hargreaves Land, the property development business of Hargreaves Services, and developer Waystone on the first major commercial contract at joint venture Unity: the mixed-use regeneration project, located at Hatfield, adjacent to junction 5 of the M18.
The deal will see the development of a 800,000 sq. ft distribution and training centre located on Unity’s Connect zone - and is expected to create more than 1,000 jobs as part of the occupier’s acquisition programme.

The sale will also realise approx. £25m of revenue for the joint venture on legal completion. This is expected in the middle of 2021 and is conditional upon the grant of planning permission and construction of a new access road, which will provide direct access to junction 5 of the M18.

Unity comprises 618 acres of land, 148 of which is allocated for employment and commercial uses, with the remainder for residential development.

In total, Unity is set to comprise more than two million sq. ft of employment space, 3,100 new homes, a new marina, school, transport hub and about 200 acres of open spaces.

David Anderson, Hargreaves’ Group property director, said: “We are delighted to exchange contracts with this leading national retailer on the first major commercial transaction at the Unity scheme. The decision to base one of their key distribution hubs at Unity underlines the quality of the location from a logistical perspective.

“In addition to the 190,000 sq. metres (2m sq. ft) of commercial and industrial consents, we also have planning permission for 3,100 residential units at the site. We are encouraged by the ongoing level of interest in the scheme and look forward to building on this momentum over the coming year and beyond.

Toby Vernon, Partner at CPP added: “This extremely positive news for Doncaster and the wider region. The proposed development will deliver an 800,000 sq ft warehouse and lead to over 1,000 new jobs.

“We are delighted to have supported this deal, not least in the current climate, delivering major economic growth for south Yorkshire, and reflective of the strength of this new business park. Unity is located in a prime position with immediate access from Junction 5 of the M18. A further 70 acres of land is available for commercial development.”

Over the next 20 years the development is expected to inject more than £900m into the region's economy and create up to 7,000 jobs.

CPP acted as joint agents with Knight Frank.
Appendix 3 – Site 747 Current Promotional Material
Immediate availability

iP2e (195,000 sq ft) and iP2g (119,060 sq ft) are immediately available. Both units comprise steel portal framed warehouses with 55m deep secure yards, separate car parking with clear internal headroom of 15m and 12.5m respectively.

Build-to-suit opportunities

Verdion is ready to deliver technically–complex, bespoke facilities of up to 817,000 sq ft on sites already prepared for development. The unit sizes and layouts shown here are indicative and can be updated to suit occupier requirements.

For all enquiries please contact:

Mike Baugh
T: +44 (0)113 394 8844
mike.baugh@cbre.com

Dave Cato
T: +44 (0)113 394 8821
dave.cato@cbre.com

Robert Whatmuff
T: +44 (0)113 200 1819
robert.whatmuff@colliers.com

Len Rosso
T: +44 (0)20 7487 1765
len.rosso@colliers.com

Andrew Gent
T: +44 (0)113 200 3981
andrew.gent@gentvisick.com

Paul Mack
T: +44 (0)113 200 3987
paul.mack@gentvisick.com

52 MVA POWER

STRONG LOCAL WORKFORCE WITH AMPLE CAPACITY FOR FUTURE GROWTH
APPENDIX 2

NOTE BY SANDERSONS
Matter 8 - Sanderson Associates

Q8.4. Are each of the employment allocations without planning permission listed in Table 4 suitably located and likely to be developed during the Plan period as assumed in the Plan?

- Thorne North, M18 junction 6 (001)
- RHADS site 1, Phase 4 Business Park (941)
- Carcroft Common (441)
- Bankwood Lane, Rossington (1032)
- Balby Carr (092)
- Middle Bank, Balby (258)

A1-A19 Link Road (Pan Northern Route) (PNR)


“As well as supporting the M18 corridor, it is necessary that land in the north of Doncaster is allocated to ensure regeneration is spread across the Borough. Land in the north of Doncaster tends to have low value and poor accessibility as well as flood risk issues. Proposals for an A1 to A19 link road will unlock this potential by providing improved access to the A1(M). However, this will be towards the end of the plan period when there are clearer proposals for A1 improvements and funding for an A1-A19 link. Once these highway links are in place there are considerable prospects for the north of Doncaster including land at Carcroft Common of 54ha.”

Extract from Local Plan Publication Version - Table 7: Major Road Network Enhancement Priorities

“It is envisaged that the proposed PNR will form part of a series of interlinking routes, between Manchester and the Humber Ports (via Barnsley and Doncaster). The PNR will deliver two key projects for Doncaster; the Hickleton and Marr bypass and the A1-A19 link road. It will also enable connection between the A19 and the M18. The PNR is subject to funding being approved and the precise route is yet to be finalised. If funding is not forthcoming the A1-A19 and the Hickleton and Marr bypasses will be delivered as stand-alone schemes.”

- Local Plan Policy 13: Strategic Transport Network (Strategic Policy) Part A – 2 refers to the construction of the North Doncaster A1-A19 Link. This is further referred to in Table 7.

- Local Plan Paragraphs 7.2 and 7.3 make reference to the Sheffield City Region Transport Strategy (SCRTS) “The Local Plan and the Transport Strategy will mutually seek to alleviate existing transport issues, implement new road infrastructure (where required to support economic objectives).”
• SCRTS March 2019 Section 5.2.3 does not list the A1-A19 Link to the north of Doncaster as one of its intervention schemes.

• Southern Pennines: Strategic Development Corridor SPOC (March 2019) (Table 8 - Appraisal of Strategic Outline Programme of Road Interventions) lists the A1-A19 Link as one of the “Road Interventions Appraised within the Economic Dimension”.

• Southern Pennines: Strategic Development Corridor SPOC (March 2019) (Figure 25 page 85) shows an indicative line for the A1-A19 link. However, there is very little additional information about the proposal (which forms part of the ‘Southern Pennines SDC Road Reference Case and SOP Proposals’) other than the general information contained at paragraphs 6.19-6.20, which states:
  o ‘6.19 - The transport interventions shown are indicative at this stage. They are based on the level of evidence currently available at this very early stage of assessment. For many of the Reference Case schemes there remains a critical requirement to continue with the development of cases and to secure funding and TfN will work with partners to try and achieve that. It should also be pointed out that many of these interventions require further development and a positive funding decision before they can be delivered.’
  o 6.20 - Delivery of these draft transport interventions should not be relied upon for planning and development purposes.’

• In light of the above, it is clear that the delivery of the new A1-A19 cannot be relied upon; and there are significant barriers to the delivery of the scheme during the Local Plan period, as the proposal has not yet reached the Strategic Road Study stage, unlike the ‘The Trans Pennine Tunnel Study’ that is currently being developed. It is noted that there is no subsequent information superseding the above. There is no evidence that further consideration of this scheme has taken place.

• The Southern Pennines: Strategic Development Corridor SPOC clearly states that the full programme of schemes has a programme life of 2050 which is well beyond the 2035 end of the Local Plan in question.

• There is no evidence that any environmental appraisal has been undertaken on the corridor for this A1-A19 Link and neither is it clear what land ownership constraints may be encountered.

• Therefore, although this scheme is named in many strategic transport documents there is little or no evidence of how far the scheme has been progressed in terms of corridor identification, environmental assessment, land ownership constraints and more importantly funding mechanisms.

• There is, therefore, a case here against the Carcroft Common employment allocation as this site simply cannot come forward for development without the benefit of the A1/A19 Link Road.

• The Council, have, clearly stated in the Local Plan that “Once these highway links are in place there are considerable prospects for the north of Doncaster including land at Carcroft Common of 54ha.”
That implies that without the highway works the prospects for north Doncaster sites including Carcroft Common remain limited.

The Local Plan proposes limited housing allocations in the Carcroft area which would generally assist in bringing such strategic schemes forward e.g. funding streams for the A630 dualling scheme will likely become available from the major housing allocations at Edlington, Armthorpe and Doncaster MUA.

The Council does not provide any clarity or confidence in any of its Local Plan documents with regards to the proposes to fund the A1-A19 Link Road and it is clear that cumulative developer funding from other sites is unlikely to be available.

WMPE will require off-site highway improvements. However, the core local network and connections to the strategic network already exist and there are considered to be much better opportunities e.g. housing allocations within Armthorpe and Edlington as well as Doncaster MUA, for the cumulative funding of the works necessary.

**A630 West Moor Link**

- The A630 West Moor Link is a scheme that will enhance the location of development on Junction 4 of the M18. It is not necessary for the development of the employment site promoted on the eastern side of that junction, but it is clearly good planning for development to take advantage of and be coordinated with new infrastructure.

- In partnership with the Sheffield City Region, Doncaster Council have plans to upgrade the A630 to dual carriageway standard between Edenthorpe and M18 Junction 4.

- Funding has been secured from various sources £8.3 million of funding is (provisionally) allocated through the Sheffield City Region Investment Fund. Total scheme cost is £10.65m. A full business case was submitted to the SCR in June 2019 to secure funding. Sign off is expected early 2020 (suspect COVID-19 delay).

- There are also proposals in place to upgrade the various roundabouts along this route as part of a package of improvements (West Moor Link Improvements) that have been designed to accommodate future traffic growth.
APPENDIX 3

LETTER SENT TO ENVIRONMENT AGENCY REGARDING SITES 001 AND 441
Our Ref: 126941/LI/JA/L24
Date: 4th February 2020

Paul Goldsmith
Environment Agency
paul.goldsmith@environment-agency.gov.uk

Doncaster Council’s Local Plan and Flood Risk – Our Concerns Regarding the Council’s Approach to the Selection of Employment Allocations

Dear Paul,

Job No. 126941

Fairhurst have been appointed by Blue Anchor Leisure Ltd to assess flood risk in relation to Doncaster Council’s selection of employment allocations for future development.

Our client is promoting West Moor Park East (site 1031), which is not currently proposed for allocation.

Our assessment has been undertaken with regard to non-allocated site West Moor Park East and six proposed allocations (sites 001, 092, 258, 441, 878/1032 and 941; refer to site location plans enclosed within Appendix A).

Of these six proposed allocations, two sites stand out as being subject to flood risk issues from Flood Zone 3a; Thorne North (site 001) and Land at Carcroft Common (site 441), respectively.

Fairhurst have reason to believe that the Council’s approach to the selection of employment allocations does not fully accord with the flood risk sequential approach and risks putting people and property at a greater risk of flooding than is necessary. This has been demonstrated by the November 2019 floods, in which widespread flooding impacted to some of the proposed employment allocations, but did not impact to West Moor Park East.

Fairhurst consider this to be an important matter that the Environment Agency should be aware of, and a matter that the Agency should be making representations to the Council and the forthcoming Local Plan Examination about.

The Publication Draft was consulted upon in September 2019. Submission to the Planning Inspectorate is expected shortly. Examination of the Council’s Local Plan by the Planning Inspectorate is due to take place later on in the year.

This submission has been prepared in light of the recent widespread flooding at Thorne North and Land at Carcroft Common, and the site visits undertaken to assess the impact of this flooding at each site.

Our aim is to provide as much information as we can to support the allocation of West Moor Park East ahead of Thorne North and Land at Carcroft Common.

We have provided below a summary of our concerns regarding the Council’s approach to the selection of employment allocations. We would appreciate the Environment Agency’s comments with regard to this information.

The Sequential Approach

The following key issues have been raised within our Flood Risk Assessment Report for Land Allocation (Ref. 1):

- West Moor Park East is >50% in Flood Zone 1, with the remainder in Flood Zone 2 and 3a.
- Thorne North and Land at Carcroft Common are both subject to flood risk issues from Flood Zone 3a.
- The total area of West Moor Park East is 88.54Ha. The allocation of this site would provide 48.6Ha of future development in Flood Zone 1, with the remainder in Flood Zone 2 and 3a.
- The total area of Thorne North is 73.63Ha. The allocation of this site would provide 71.41Ha of future development in Flood Zone 3a. West Moor Park East could provide around 60% of this development in Flood Zone 1.
The total area of Land at Carcroft Common is 48.7Ha. The allocation of this site would provide 48.57Ha of future development in Flood Zone 3a. West Moor Park East could provide all of this development in Flood Zone 1.

Thorne North and Land at Carcroft Common are both shown to benefit from flood defences. In the Site Appraisal Criteria for Appraising Site Options/Proposals (Ref. 2), the Council state that “if the defences were not there, these areas would be flooded”.

The Council accept that flood mitigation can be provided to Thorne North and Land at Carcroft Common, allowing both sites to be taken forward albeit failing the flood risk sequential test.

The draft plan makes no allowance for flood mitigation that can equally be provided to West Moor Park East for the 36.5Ha in Flood Zone 3a. No flood mitigation measures would be required for the 48.6Ha in Flood Zone 1.

**Provision of Flood Mitigation to West Moor Park East**

Discussions have previously been held with the Environment Agency with regard to flood mitigation that can equally be provided to West Moor Park East. These have demonstrated that future development at this site would be readily capable of meeting any onsite flood risk issues as follows:

- In an email response dated 24th January 2019, the Environment Agency stated they have “no major issues” with the proposal if FFLs in the region of 3.5mAOD can be achieved with further resilience built in (i.e. raised electrical sockets).

- The land in the east and west of the site, which is in Flood Zone 3a, already has an elevation of 3m to 4mAOD or higher. A nominal 0.5m increase in site levels in this area is achievable within the site and is not likely to significantly impact in flood terms to the wider area. The remaining land in Flood Zone 1 has an elevation of >5mAOD.

**Provision of Flood Mitigation to Thorne North and Land at Carcroft Common**

The provision of flood mitigation to Thorne North and Land at Carcroft Common has been assessed as follows:

- As detailed within the Council’s ‘Development Site Assessment Spreadsheet – Residual Risk’ (Ref. 3), any future development at Thorne North and Land at Carcroft Common would require FFLs to be set at a minimum of 5mAOD.

- Site levels at Thorne North are in the region of 3mAOD, and at Land at Carcroft Common in the region of 4mAOD. As such, a potential 1m to 2m increase in site levels would be required in some areas and may result in a significant loss of flood storage capacity; it is difficult to see how this would not impact in flood terms to the wider area.

- A caravan park is present in the south of Thorne North and a residential estate to the south of Land at Carcroft Common. An increase in site levels risks putting these adjacent vulnerable land uses at a greater risk of flooding than is necessary, with associated additional costs.

**November 2019 Floods**

Severe and widespread flooding impacted to the general area following a period of prolonged and heavy rainfall in November 2019. In order to assess the impact of this flooding at each site, a series of site visits were undertaken between 8th and 18th November 2019. Photos were taken at street level and by drone (enclosed within Appendix B).

The following observations were made:

**West Moor Park East**

- Small area of standing water in the field adjacent to the M18, likely attributed to the short-term saturation of the ground (Fig. 1).

- Dry throughout the rest of the site, with the exception of localised areas of boggy ground (Fig. 2).

**Thorne North**

- Widespread flooding across the whole site (Fig. 3 and 4) and land adjacent to the river channel (Fig. 5).
Land at Carcroft Common

- Widespread flooding across the whole site (Fig. 6, 7, 8 and 9).

Thorne North and Land at Carcroft Common are both shown to benefit from flood defences, which may have been a contributing factor in the Council’s initial decision to accept their allocation. However, both sites flooded extensively during the recent flood event, which suggests that the Council’s approach to the selection of employment allocations may be flawed.

Discussion

The following key points are raised in relation to the viability of the Council’s selection of employment allocations for future development, and to support the allocation of West Moor Park East ahead of Thorne North and Land at Carcroft Common:

- Thorne North and Land at Carcroft Common are both subject to flood risk issues from Flood Zone 3a and both flooded extensively during the recent flood event.
- Thorne North and Land at Carcroft Common are both fully in Flood Zone 3a.
- Thorne North and Land at Carcroft Common are both shown to benefit from flood defences, which may have been a contributing factor in the Council’s initial decision to accept their allocation. However, both sites flooded extensively during the recent flood event, which suggests that the Council’s approach to the selection of employment allocations may be flawed.
- West Moor Park East is >50% in Flood Zone 1, with the remainder in Flood Zone 2 and 3a and did not flood during the recent flood event.
- The Council accept that flood mitigation can be provided to Thorne North and Land at Carcroft Common, allowing both sites to be taken forward albeit failing the flood risk sequential test.
- However, any future development at Thorne North and Land at Carcroft Common would require FFLs to be set at a minimum of 5mAOD, which may result in a loss of flood storage capacity that could impact the wider area.
- The draft plan makes no allowance for flood mitigation that can equally be provided to West Moor Park East in the form of minimum levels with resilience built in.
- In our view, as West Moor Park East is >50% in Flood Zone 1, this site is sequentially preferable to Thorne North and Land at Carcroft Common.

We believe that it is crucial that the Environment Agency looks into the Council’s approach to the selection of employment allocations further and takes an active part in the forthcoming Local Plan Examination. As matters stand, we do not believe the Council’s approach to the selection of employment allocations is sound.

We look forward to receiving the Environment Agency’s response.

Yours sincerely

Anthony Simmons
Partner
Fairhurst
Email: anthony.simmons@fairhurst.co.uk

References:

Enc.
Appendix A: Site Location Plans
Appendix B: Site Photos

CC:
Mark Eagland (Peacock and Smith): mark.eagland@peacockandsmith.co.uk
Lorna Indriks (Fairhurst): lorna.indriks@fairhurst.co.uk
Appendix A

Site Location Plans
Appendix B

Site Photographs

Figure 1. West Moor Park East 13/10/2019, looking west.

Figure 2. West Moor Park East 13/10/2019, looking east (note: lakes in the far south east are pre-existing features within a landscaped holiday lodge site).
Figure 3. Thorne North 08/10/2019, looking north west.

Figure 4. Thorne North 13/10/2019, looking south west.
Figure 5. Thorne North 13/10/2019, looking west.

Figure 6. Land at Carcroft Common 08/10/2019, looking south.
Figure 7. Land at Carcroft Common 13/10/2019, looking north.

Figure 8. Land at Carcroft Common 13/10/2019, looking north east.
Figure 9. Land at Carcroft Common 13/10/2019, looking south east.