Hearing Statement – Matter 8

Doncaster Local Plan

On behalf of Firsure Ltd

August 2020
I. **Introduction**

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

   Matter 8: Economic Development

1.2. Firsure Ltd 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 for ease of reference. The following responses should be read in conjunction with Firsure Ltd comments upon the submission version of the Doncaster Local Plan, dated September 2019.

1.4. Firsure Ltd has also expressed a desire to attend and participate in Matter 8 of the Examination in Public.
2. **Matter 8 – Economic Development**

**Q8.1. Is policy 5 relating to employment policy areas defined on the Policies Map justified and consistent with national policy? Are the Council’s suggested changes to paragraphs 16.127 and 16.158 necessary to make the Plan sound?**

2.1. Firsure Ltd has no particular comment in relation to this issue.

**Q8.2. 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?**

2.2. Firsure Ltd has reviewed the sites within Tables E1 to E8 against the information within SDEB 7, following the significant changes to site areas indicated as being available within the Plan Period identified within the Council's Suggested changes [CSD 6 and DMC 15].

2.3. The Submission Plan Tables E1 to E8 indicated that 284.79 hectares were capable of coming forward within the Plan Period. As a result of amendments in CSD 6, the Council consider that 201.03 hectares are now capable of coming forward in the Plan period. This is predominantly due to a reduction in the amount of land considered available at 1st April 2018 on Site 747. As indicated in the table below, the SDEB 7 indicates that further land may be available within the area allocated as 747, than suggested in the suggested changes.

2.4. Consistent with the evidence on demand, a number of the sites within E1 to E8 are or have come forward. We note that recent take up at Site 418 Unity, indicates that over the Plan period more of the site is likely to come forward than anticipated within the Plan. This reflects the recent investment in the location, particularly noting that the Policies Map allocates the entire site. There are no mechanisms within the Policy 4 to limit the remaining 33 hectares of the site available for employment coming forward during the Plan period.
Therefore, Firsure Ltd consider that there is further land likely to come forward, on allocated sites, as illustrated on the Policies Map, than indicated to be in Tables E1 to E8 (Plan period total). As Firsure Ltd consider in Matter 2 it is crucial that housing growth aligns with the level of employment growth supported through the Plan, in order to not constrain economic growth.

<table>
<thead>
<tr>
<th>Site</th>
<th>Size (ha)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>418</td>
<td>66.6 (33.6 within the Plan Period)</td>
<td>The allocation indicates that 33.6 hectares are identified as being able to come forward within the plan period with the remaining land (33 hectares) likely to come forward beyond the Plan Period. Post the publication of SDEB 7, a significant deal has been agreed at Unity for a regional distribution centre and training facility, a take up of 79 acres (circa 32 hectares), leaving circa 1.6 hectares of the element of the allocation proposed to come forward within the Plan Period. There is no policy mechanisms to prevent the remaining 33 hectares, forecast to come forward beyond the Plan Period, from coming forward within the Plan Period. In line with the level of investment at this location. Firsure Ltd would expect further take up during the Plan Period. As indicated in response to Q8.3 there is a need to clarify the amount of land being allocated in table E1 – E 8 within the Plan Period</td>
</tr>
<tr>
<td>747</td>
<td>158 ha/79ha</td>
<td>SDEB 7 evidence on take up indicates that the site is capable of coming forward as anticipated within the Plan period, having regard to level of take up to date, the recent infrastructure improvements, including the availability of a rail freight terminal, and enhancing multi modal access to the site. As indicated in response to Q8.3 there is a need to clarify the amount of land being allocated in table E1 – E 8 within the Plan period. SDEB 7 refers to a different quantum of land available in the area identified on the Policies Map for site 474. ELR Site</td>
</tr>
</tbody>
</table>
Reference 389 refers to 80 hectares, Site 372 is noted to be 2.54 ha, and Site 301 is noted to have 21 hectares, a total availability of 101.54 hectares at 1st April 2019 and not 79 hectares as indicated within the Plan.

2.6. Firsure Ltd consider that there is a need to review the allocations within Table E1 to E8, to ensure that it reflects the likely potential for economic growth within the Plan Period.

Q8.3. Should the Plan include a policy to make clear how a decision maker should react to development proposals that may come forward during the Plan period on employment allocations that had planning permission in 2018?

2.7. Firsure Ltd consider that as presently written Policy 4 and the associated Tables E1–E8 is not sufficiently clear or justified.

2.8. Policy 4 states that the sites shown in Table 4 and on the Policies Map will be allocated for employment uses. The Policies Map identifies the employment allocations. The area of land identified for employment in the Policies Map is greater than the amount of land identified for employment during the Plan Period within Table 4 and Table E1-E8, and reflects the total amount of land available for employment at each site, an additional 37.06 hectares under Table 4, and an additional 34.5 hectares under Table E1-E8.

2.9. Site 418 has 66 hectares available for employment land, though only 33.6 hectares are stated ‘to be developed in the plan period’. In May 2020 a significant deal amounting to the take up of 79 acres (circa 32 hectares) was agreed, leaving 1.6 hectares available for the remaining plan period. There is no mechanism to prevent the remaining land coming forward, and based on take up at August 2020, Firsure Ltd consider it would be unreasonable for the Plan to seek to do so.

2.10. Policy 4 and Tables E1-E8 should be revised so that the Policies Map, Policy 4 and associated tables are all consistent, and reflect the amount of land that is available to come forward within the Plan period, and support effective monitoring through the ELR.
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)

2.11. Firsure Ltd has no specific comment to make on this issue, other than to indicate that the area of land identified for employment in the Policies Map is greater than the amount of land identified for employment during the Plan Period within Table 4 and reflects the total amount of land available for employment at each site, an additional 37.06 hectares under Table 4. Firsure Ltd do not consider that it is appropriate for the Plan to seek to constrain the level of growth that will come forward on sites during the Plan period, in the light of the evidence of take up of future demand discussed in Matter 2.

Q8.5. 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?

2.12. Firsure Ltd consider that employment and housing growth should align. 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% demand for employment land for strategic warehousing [SDEB Table 12] which confirms the continued demand in the M18 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 which are in locations that are accessible to MUA/Main towns on the M18/M180 corridor.

Q8.6. Does the Plan identify sufficient opportunities to ensure that the identified need for additional office floorspace can be accommodated over the Plan period?

2.13. Firsure Ltd has no specific comment in relation to this issue.

Q8.7. Are the site specific requirements for employment allocations set out in Appendix 2 justified? Is there sufficient detail in the Plan to provide clarity to developers, local communities and other interested parties about the nature and scale of development proposed on all employment allocations?

2.14. Firsure Ltd has no specific comment in relation to this issue.

Q8.8. Are the design requirements for all non-residential, commercial and employment development set out in policy 47 justified?

2.15. Firsure Ltd has no specific comment in relation to this issue.

Q8.9. Is the Council’s suggested change to policy 27 part A requiring all non-residential development on sites of one hectare or more to provide green infrastructure masterplans necessary to make the Plan sound and is it justified?

2.16. Firsure Ltd has no specific comment in relation to this issue.
Q8.10. Are the requirements in policy 55 for mitigation measures relating to noise, air quality, water and artificial lighting justified in so far as they relate to employment development? In particular, are the noise standards in appendix 11 justified, and is the change suggested by the Council needed to ensure that the Plan is clear about how they are intended to be taken into account by decision makers?

2.17. Firsure Ltd has no specific comment in relation to this issue.

Q8.11. Is the suggestion in policy 4 part C that for developments that propose 20 or more direct jobs the Council will seek to enter into local labour agreements with the developer/applicant compliant with relevant legal requirements and national policy?

2.18. Firsure Ltd has no specific comment in relation to this issue.

Q8.12. Would policy 26 parts 1 and 4 be effective in enabling the sustainable growth and expansion of all types of business in rural areas through the conversion of existing buildings and well-designed new buildings?

2.19. Firsure Ltd has no specific comment in relation to this issue.
Proposed Change

2.20. To overcome the objection and address soundness matters, the following changes are proposed:

- Revise the table 4 and Tables E1 to E8, to ensure that the level of land identified reflects the extent of the allocation and the amount of employment land that could come forward within the Plan Period/extended Plan Period.