Hearing Statement – Matter 8

Doncaster Local Plan

On behalf of Harworth

August 2020
1. **Introduction**

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

   Matter 8: Economic Development

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

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

1.4. Harworth has also expressed a desire to attend and participate in Matter 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. Harworth have no particular comments 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. Harworth have reviewed the sites within tables E1 to E8 against take up within SDEB 7. Consistent with the evidence on demand a number of the sites within E1 to E8 are or have come forward. Further an update to the detailed analysis of sites by Knight Frank which accompanied Harworth’s representations, can be found in Appendix 1. There are two sites in within the MUA (sites 1096 and 1098) that are unlikely to come forward within the Plan period or at least the first half of the Plan period and should not be relied on to contribute towards the strategic requirement to deliver 481 ha of employment land. This indicates a need for further allocations of employment land to meet this shortfall to ensure that there is a supply of readily available employment sites in locations to suitable to meet the identified needs.

2.3. Harworth note that there are only limited sites that are capable of accommodating Strategic Warehousing / Distribution facilities within Doncaster, having regard to their location and the scale and nature (Site 418, 747, 818 and 1099). The take up at these sites evidences the demand for readily available employment land in locations with good access to the Motorway network (M18/M180) and benefiting from multi modal transport connections. As noted within Matter 2, Warehousing / Distribution represents the majority of take up, and future demand.
Further Allocations through Policy 4 are required that are capable of meeting demand for strategic Warehousing / Distribution.

<table>
<thead>
<tr>
<th>Site</th>
<th>Size (ha)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>1096</td>
<td>2.4</td>
<td>Part of this site has temporary permission for use as a car park until 2024 (18/02976/FUL). <strong>Do not rely on to contribute towards meeting the requirement of 481 ha.</strong></td>
</tr>
<tr>
<td>1098</td>
<td>2.53</td>
<td>This is a long standing, undeveloped UDP allocation. This raises doubts about its market attractiveness and deliverability. <strong>Do not rely on to contribute towards meeting the requirement of 481 ha.</strong></td>
</tr>
<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. 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.</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, enhancing multi modal access to the site. Knight Frank (appendix 1) indicate that current availability is circa 58 hectares.</td>
</tr>
<tr>
<td>736</td>
<td>7.28</td>
<td>This remaining allocation in Thorne has now been taken up.</td>
</tr>
<tr>
<td>818</td>
<td>12.61</td>
<td>Development is underway resulting in take up of the whole site.</td>
</tr>
<tr>
<td>1099</td>
<td>30.43</td>
<td>SDEB 7 indicates that there is 12.84 hectares remaining</td>
</tr>
</tbody>
</table>
2.4. Harworth consider that there is a need to review the allocations within Table E1 to E8, removing sites that are not considered developable for employment uses within the Plan Period and making additional allocations in Policy 4 in appropriate locations to meet as a minimum the requirement for employment land having regard to the nature of current demand and likely nature of future demand.

2.5. The limited availability of sites capable of accommodating strategic Warehousing / Distribution, within the existing supply, combined with a regional shortage of supply of such sites (Matter 2), highlights the need to allocate additional sites to accommodate strategic Warehousing / Distribution.

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?

2.6. Harworth have no specific comment in relation to this matter.

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)
2.7. As indicated in Matter 1, Harworth is extremely concerned that the Allocations in Table 4 have been informed by an inadequate evidence base and hence as a result, some of the allocations are not justified or consistent with National Policy.

2.8. It is against this context that Harworth have significant concerns with regards to the suitability of site 001.

2.9. Harworth establish in Matter 1 that it is clear that the SA has not properly informed the site selection process. This is particularly evident when reviewing the performance in the SA as amended in CSD 7. The image below compares the amended assessment of site 160 in comparison to the proposed allocation site 001.

<table>
<thead>
<tr>
<th>Site No.</th>
<th>Criteria 1</th>
<th>Criteria 2</th>
<th>Criteria 3</th>
<th>Criteria 4</th>
<th>Criteria 5</th>
<th>Criteria 6</th>
<th>Criteria 7</th>
<th>Criteria 8</th>
<th>Criteria 9</th>
<th>Criteria 10</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site 001</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
</tr>
<tr>
<td>Site 160</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
</tr>
</tbody>
</table>

2.10. Site 160 performs better than site 001 against 7 of the criteria, with particular regards to accessibility criteria. However despite the changes in performance the SA concludes that this does not affect the overall conclusions for site 160.

2.11. We also express significant concerns in relation SA objective 11A in relation to the scoring framework for ‘areas benefiting from flood defences’. It is wholly inappropriate to suggest that a low lying site located immediately adjacent to a flood defence where there is a risk of breach or overtopping is regarded as more sustainable than a site some considerable distance away from the river. Nor is it appropriate to regard such a site as equally sustainable as a site in Flood Zone 1. Harworth consider that this approach has misinformed the Plan and led to the allocation of site 001 over site 160 a more sustainable and available option in Thorne Moorends.

2.12. Harworth has raised significant concerns with regards to the approach to flood risk in the site selection process. National Policy is clear that flood risk in Plan making should be managed through, among other things, the application of a sequential risk based approach, steering new development to areas with the lowest risk of flooding and that development sites should not be allocated if there are reasonably available sites appropriate for the proposed development with lower risk of flooding. National Policy considers that the strategic flood risk assessment provides the basis for applying the test (NPPF, paragraphs 157 and 158).
2.13. NPPG makes it clear that if all development cannot be allocated on land at low risk of flooding, a Level 2 Strategic Flood Risk Assessment should inform the subsequent stages of the Sequential Test (Diagram 2 – Application of the Sequential Test for Local Plan Preparation). Due to the complex nature of flooding in the Doncaster area, the Flood Maps for Planning and the Level 1 SFRA are inadequate tools for informing the sequential test. Harworth are aware that there are inaccuracies in the Flood Zones in particular around Thorne/Moorends. These are detailed in the enclosed BWB Flood Risk Sequential Report. Appendix 2.

2.14. Doncaster Councils Topic Paper 2 [DMBC2] states that “The council acknowledges that, in order to assess the likelihood of potential sites passing the exception test, and therefore being compliant with the NPPF, we must produce a Level 2 SFRA once the EA models are completed”. This is a clear acknowledgement of the requirement for a Level 2 SFRA in order to be consistent with National Policy. However rather than adopting a precautionary approach to delay the Plan to ensure that site selection can be informed by a Level 2 SFRA, the Council are proceeding with the Local Plan. Further we consider that whilst the EA modelling is not yet complete we are advised by flood risk specialists (BWB) that there is additional information available now which would support the undertaking of a Level 2 SFRA. Doncaster Metropolitan Borough contains some of the most complex flood issues in the country and a Plan which does not fully reflect this complexity and is knowingly inconsistent with national policy should not be regarded as sound. We consider that knowingly allocating sites prior to the production of a Level 2 SFRA assessment in such a complex area is inappropriate. This issue has not been addressed in the Councils response to the preliminary questions [DMBC 7].

2.15. The Submission Local Plan attempts to satisfy the requirements of NPPF Flood Risk Sequential Test and Exception Test, using the Level 1 Strategic Flood Risk Assessment November 2015 [SDEB 13] and the Doncaster Sustainability Appraisal [CSD 7].

2.16. Harworth are concerned that some evidence to support the Sequential Test and Site Selection Process has been retrofitted and does not provide a logical basis for site selection with specific regard to Employment Sites nor is it consistent with the approach supported in Strategic Policy – Policy 3: Level and Distribution of Growth.

2.17. DMBC2 Topic paper 2 – Flood Risk prepared in support of the Submission Plan attempts to present further parameters to the Sequential Test for the selection of B8 warehouse sites. These provide preferential selection to sites within the M18 Corridor, which is defined as being within 1km of an M18 junction. Further search criteria are used which acknowledge the
ability to access the motorway by other major road links giving a 500m search radius from the roundabout furthest from the motorway, this is applied to Junction 1 of the M180. The parameters appear to be retrospective as they are not referred to in other relevant sections of the evidence base such as CSD7 or SDEB45. There is little justification for the distances used, Knight Frank consider that locations off Junction 1 of the M180, such as site 160, are firmly within the M18 corridor (Appendix 1). The criteria are not consistent with Policy 3 of the Submission Local Plan which clearly states that for Doncaster Main Urban Area and Main Towns, Logistics related employment sites should have good access to the M18 and M180, not solely the M18. The criteria within Policy 3 are supported by Harworth as they are reasonable and logical in relation to the employment market requirements and regeneration benefits for Thorne/Moorends, whereas the criteria within Topic paper 2 are inconsistent with Policy 3 and are overly restrictive and limit a thorough and reasoned consideration of alternative sites, which have a lower risk of flooding as required (NPPG ID 7-022).

2.18. Based on this information, the Submission Local Plan promotes the allocation of site 001 – junction 6 M18, Thorne North, as a future employment site, in preference to site 160 – Thorne South Urban Extension, Bradholme Farm. In previous draft version of the Local Plan, it was site 160 Bradholme Farm that was the preferred draft employment allocation. On the basis of our review the only new evidence to justify the change from the Regulation 18 Plan to the Submission Plan is the flawed Topic paper 2, and the emphasis on public comments (Q1.3 and Matter 16). The allocation of site 001 ahead of site 160 is contrary to the evidence within the SA Addendum.

2.19. A review of the two above sites has been provided in the attached Flood Risk Sequential Status Technical Note (BWB, 2020) Appendix 2. It is clear that the allocation of site 001 is founded upon inadequate information and this has led to a site selection conclusion which undermines the ‘soundness’ of the Plan.

2.20. As stated the Plan has been submitted for examination with the minimum amount of supporting evidence on flooding comprising the Level 1 SFRA 2015, which is based wholly on EA Flood Zones. These Flood Zones are very precautionary in places and should not be regarded as a definitive picture of risk, as their representation is too simplistic for a complex area. The inclusion of a Level 2 SFRA is regarded as an essential part of the evidence base which is lacking.
2.21. Appendix 2 provides an analysis of the two employment sites, and clearly illustrates the need for a Level 2 SFRA and confirms the inadequacy of the allocation process to satisfy the Sequential Test requirements within the NPPF (paragraphs 156-161). Based on a more detailed review of flood risk beyond that which is provided within the Level 1 SFRA, and the latest available flood information, it is clear that site 160 should be regarded as sequentially preferable compared to site 001.

2.22. Site 001 is reliant on flood defences including flood warning and closure of a flood gate. It is at risk of sudden inundation in the event of defence failure. Whilst isolated parts of site 160 could in theory be at risk from backing up of fluvial sources, the resulting potential for flooding would be gradual with relatively shallow depths of flooding and would be regarded as being of low hazard with no risk of sudden inundation. The allocation of Site 001 would not be consistent with NPPF, paragraph 158.

2.23. Site 001 is fully within Flood Zone 3a. The latest EA modelling information demonstrates that site 160 is largely outside the 1 in 100 year flood envelope. BWB are making a formal application to the EA to amend the flood zones in this location. The allocation of site 001 is not consistent with the framework, paragraph 158.

2.24. Site 001 has a history of flooding and has been subject to 10 flood warnings/alerts over the last decade. Site 160 has no history of flooding and has only been subject to one flood warning.

2.25. Flood risk in relation to site 160 can be managed without any impacts on third party land. Development can be delivered in a manner that ensures that buildings remain safe for the lifetime of the development, consistent with the framework (paragraph 160). There is no requirement to import earthwork fill material to site 160 to raise levels. By comparison to mitigate flood risk at site 001, earthwork analysis indicates that significant amounts of fill material will be needed, equating to around 100,000 lorry movements. This is not consistent with the sustainability requirements of the flood risk exception test. The SA only makes reference to the simplified Flood Zone information presented in the Level 1 SFRA, and hence the allocation of site 001 has not been informed by a sufficiently accurate and robust evidence base.

2.26. Having regard to the above and Appendix 2 it is clear that the allocation of site 001 in preference to site 160 would not be consistent with the Framework, paragraphs 155 to 160.
2.27. Policy 3 of the Plan states that future employment needs will be accommodated on sites that are attractive to market investment and can be accessed via a range of transport modes. Paragraph 4.27 is clear that whilst sites are required in locations attractive to the market that there is a need to ensure that there is strong accessibility and connectivity between where people live and the employment opportunities. Further it considers that this is particularly important for communities across the borough that display high levels of deprivation. Thorne is recognised within the Plan as a place that is need of regeneration (paragraph 16.130), and we have noted neighbourhoods within Thorne and Moorends now rank more highly in terms of deprivation than they did in 2015 (Matter 3). The identification of site 001 is not consistent with Policy 3 with regards to accessibility. DPL Appendix 3 raises significant concerns with regards to the accessibility of site 001. This demonstrates that site 001 is not consistent with the provisions of the NPPF, and the Submission Plan (Policies, 2, 3, and Policy 14).

2.28. DLP have reviewed the SA and Site Selection Methodology with respect to access and have established that it is not consistent with the 2019 Framework paragraphs 102, 108 and 110, with specific regards to the needs of pedestrians, cyclists, and those with a disability and reduced mobility. This is detailed in Appendix 2. DLP conclude that the SA scoring ignores high speed and high risk conflicts that those with disabilities, reduced mobility, pedestrians, cyclists, and rail users would be required to endure in order to access site 001. The application of this flawed process has led to the selection of site 001.

2.29. Site 001 is located to the north of Thorne and there are significant physical barriers, (substandard footways and a high speed motorway interchange) that impact on the potential for active travel to it from the urban areas of Thorne. DLP concludes pedestrian access to site 001 by people with disabilities or reduced mobility is prevented by these constraints and as such site 001 is not consistent with the NPPF paragraphs 102E, 108 and 110.

2.30. Similarly, the route for pedestrians to access site 001 would involve crossing nine lanes of traffic, seven of which are on a high speed route, and two of which have restricted visibility. With respect to pedestrian access, site 001 is not consistent with NPPF paragraphs 102C, 102E, 108A, 108B, 110A and 110C. DLP note that the current Application (Ref 16/02136/OUTM) for site 001 proposes no enhancements to the existing cycle route network, as there is limited potential for enhancement to the east of Selby Road as this would require 3rd Party Land. As a result there is not a safe route for cyclists which does not involve crossing the high speed motorway interchange and high speed routes. The allocation at site
001 would not therefore be consistent with the NPPF paragraphs 102C, 102E, 108A, 108B, 110A and 110C.

2.31. DPL also set out significant concerns regarding the potential for bus provision. Site 001 is not currently served by a bus route, and the feasibility of extending existing services at this location is not likely to be economically viable. DLP also note that rail users would be faced with the same challenges as pedestrians due to the location of the Thorne North Rail Station in relation to site 001.

2.32. DPL consider that site 001 is poorly located with regard to opportunities for active travel and that the route both to Thorne urban area and the Thorne North Rail Station contains significant physical barriers which will preclude its use by pedestrians and cyclists. Site 001 is therefore fundamentally a car borne scheme with little direct linkage to Thorne (or its train station) for future employees. Site 001 is therefore not consistent with the NPPF in respect of sustainable travel choices (paragraphs 102, 108, 110 and 111), or existing Development Plan and Submitted Local Plan policies. In comparison Site 160 benefits from access via a range of non car modes, the site incorporates active travel links to and routes within the site, the site is served by bus, please refer to the original representations, and Appendix 4 for further details.

2.33. Harworth have fundamental concerns with the site selection methodology with particular regards to consistency with the 2019 Framework in relation to flood risk and access. It is evident that the flawed process has led to the allocation of site 001 which is not consistent with the framework and the strategic aims of the submission Plan. Site 001 is not suitable in the context of the Framework, and its allocation is not justified. Omission Site 160 performs better in the Sustainability Appraisal, despite flaws in this document relating to flood risk. Site 160 is in a location that is accessible to the residents of Thorne (appendix 4) and consistent with the accessibility approach of the Framework, and therefore capable of supporting the wider regeneration ambitions for Thorne, as expressed throughout the Plan (paragraphs 16.130 and 4.31 in respect of the need for regeneration in the North, and investment in Thorne; and paragraphs 2.18, 2.20 and Policy 2 and 3 in support of the regeneration of the Main Towns, including Thorne). BWB also conclude that site 160 is in a sequentially preferable location with regards to Flood Risk when compared to site 001. Site 160 should therefore be re-instated as the preferred strategic employment allocation serving Thorne.
2.34. In relation to the remaining allocations in Table 4. We make the following comments:

<table>
<thead>
<tr>
<th>Site Ref</th>
<th>Size</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>441</td>
<td>24.64</td>
<td>This is a longstanding allocation that has remained undeveloped due to significant constraints. The ability for the site to come forward is dependent on the delivery of significant infrastructure improvements, including capacity improvements on the A1(M) and the delivery of A1/A19 link. There are no clear proposals or funding arrangements for improving access to the A1(M) and delivering the A1/A19 link, as acknowledged in the Plan (4.31 and 4.58) which states that a mixture of public and private investment would be needed over the long term to improve accessibility to new potential employment areas. There is insufficient evidence at this point to demonstrate that the site can be delivered within the Plan Period and hence it should not be relied on to contribute towards meeting the identified need. It would be more appropriate to safeguard/reserve the site for future development. <strong>Do not allocate. Identify as a reserve development site.</strong></td>
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2.35. Harworth considered the need for employment land, and nature of demand in Matter 2. The Employment Land Review 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 / M180 corridor. It is therefore vital that there are sufficient employment allocations capable of accommodating the needs of strategic warehousing which are in locations that are accessible to MUA/Main towns within the M18/M180 corridor.

2.36. Harworth is concerned, in the light of conclusions in relation to site 001, that none of the allocations within Table 4 are suitable for accommodating the needs for strategic warehousing.
On review of SDEB 10, and Harworths representations, sites 92, 258, 441, 941, and 1032 are more suited to B2/B8 (general employment need use) and mid box distribution rather than strategic distribution. Harworth do not consider that site 441 should be relied on to contribute towards the supply within the Plan period. Therefore there is a need for additional allocations to meet the identified needs for employment land.

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?

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

2.38. Harworth are concerned that there are only four sites identified within the Plan, Table 4 and Tables E1- E8 that are located within the M18/M180 corridor that are of sufficient scale to accommodate part of the identified needs for strategic distribution. Based on the Submission Plan target for employment land need of 481 ha, and the proportionate split of the requirement based on the evidence in SDEB 6, at least 56% of sites should be capable of meeting the needs for strategic distribution. This equates to 269.36 hectares of land. Sites 001, 481 and 747 are identified as contributing 164.14 hectares of land within the Plan period and hence there is a shortfall of 105 ha of land that is suitable for strategic distribution. We have already raised significant concerns with site 001. We also note that there are only another two sites available on the M18 corridor that are capable of meeting need for mid box
distribution facilities and manufacturing needs, Site 1099 with circa 13 hectares remaining, and Site 818 with circa 12 hectares remaining, albeit now built out speculatively. There is therefore a clear need to identify more land within the M18/M180 corridor to meet the anticipated demand for logistics within Doncaster.

2.39. SDEB 9 identifies other sources of supply. This consists of 21 sites generally within existing employment locations. The average size of these sites is below 2 hectares, with only 1 site over 6 hectares. None of the sites are suitable to accommodate strategic distribution due to their site size and they are more suitable for localised employment needs or expansion of existing businesses, rather than for general employment needs and specifically for large footplate warehousing and distribution.

2.40. In response to Q8.2 and 8.4, we note that just over 17 hectares of the identified land should not be relied on to contribute towards the identified need, although it is feasible that this could be higher. In Matter 1 we consider that due to the timing of submission, the Plan period should be extended by at least a year to ensure that the Plan is consistent with the Framework.

The implications of reducing the supply by a minimum of 17 ha, and uplifts to the requirement to reflect the need for the Plan to cover a period of 15 years post adoption is demonstrated below. This assumes that all of the additional land available at the following sites would be capable of coming forward by 2036: sites 001, 092, 418 and 569. If site 001 is removed as we advocate, there is an even greater shortfall in supply. There is however a significant shortfall in supply even when assuming all sites can come forward by 2036 as intended by the Council, and where the requirement is based on a need for 24 ha per annum.

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<tbody>
<tr>
<td>Requirement 2015-2035</td>
<td>481</td>
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<td>540</td>
<td>630</td>
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<td>Requirement 2035-2036</td>
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<td>31.5</td>
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<tr>
<td>Total Need</td>
<td>505</td>
<td>505</td>
<td>567</td>
<td>661.5</td>
</tr>
<tr>
<td>Completions (2015-2035)</td>
<td>117</td>
<td>117</td>
<td>117</td>
<td>117</td>
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</tbody>
</table>
2.41. Harworth have reviewed the likely demand for employment land going forward, and in particular the demand for warehousing / distribution, and have concluded that the demand and take up is likely to be significantly higher than 24 ha per annum. Harworth have also highlighted that there is a shortage in supply across the region. Having reviewed the supply within Doncaster, Harworth consider that the identified supply will not be sufficient to meet the identified needs or to ensure that there is sufficient flexibility to respond to market changes, particularly when considering the needs of different e-commerce sectors. Further we consider that site 001 is not suitable and that its allocation is not justified within the context of the 2019 Framework. Harworth consider that there is a clear need to identify additional allocations to meet the anticipated shortfall and that such sites should be able to accommodate large scale / strategic distribution / warehousing units, in locations that are attractive to the market within the M18 / M180 corridors and that are accessible to the Main Town or Urban area that will support the need for regeneration in the north of the borough.

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?
2.42. Refer to our Participant Statements for Matter 2 and Matter 16, with regards to the implications on the supply of land in response to the introduction of Class E and changes to Permitted Development rights.

**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? 98

2.43. Harworth 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?

2.44. Harworth 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?

2.45. Harworth 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?

2.46. Harworth 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?

2.47. Harworth 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?

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

Proposed Change

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

- Identify additional employment land to meet the anticipated shortfall.

- Delete the allocation site 001, Thorne North, and replace it with an appropriate alternative capable of contributing to the regeneration of Thorne and meeting the spatial strategy. Omission site 160 is the most suitable site to meet this shortfall.
Appendix 1: Knight Frank update letter, August 2020
Dear Joanne

Gateway 180 at Bradholme Farm

Introduction

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

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

The report will consider the following:

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

Location

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

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

National Market Overview

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Regional and Local Market Overview

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

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

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

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

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

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

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

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

![Knights Frank Sheffield L&I Enquiries](image-url)

Source: Knight Frank
In terms of active requirements at the larger end of the market, we highlight the following:

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

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

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

### Update on current Supply

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

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

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

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

**Commentary**

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

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

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

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

<table>
<thead>
<tr>
<th>Total Site Area: 334 acres (135ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum Building: 817,000 sq ft</td>
</tr>
<tr>
<td>Land Remaining: Approximately 144 acres (58ha)</td>
</tr>
<tr>
<td>Total Sq Ft Remaining: Approximately 2,796,960 sq ft</td>
</tr>
</tbody>
</table>

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

**Overview**

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

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

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

**Commentary**

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

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

Update - There is no change in availability here.

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

### G Park, West Moor Park Extension, Armthorpe, J4 M18 - (1099)

#### Overview

G Park Doncaster is a Logistics Park owned by Gazeley (GLP) and consists of a new speculatively developed warehouse unit of 278,852 sq ft with a further 32 acres (13 ha) of fully levelled and plateaued land on Plot B which can accommodate up to a further 606,000 sq ft. The original site extended to approximately 126 acre (gross) with the first phase consisting of a single 915,848 sq ft warehouse developed for Next plc.

The site is well positioned with close links to Junction 4 of the M18 motorway as well as the main urban area of Doncaster and is the last remaining development opportunity within West Moor Park.

#### Commentary

West Moor Park is a well-established business park location and has attracted local, national and international occupiers over the years, namely IKEA, ASOS, ABP, Evergreen and Next Plc who took 916,000 sq ft from Gazeley in 2014.

Update - The developer completed the speculative development of 278,000 sq ft April 2019 which is being marketed to let. The remaining plot has simultaneously been plateaued and is now ready for immediate development capable of accommodating a single building of up to 606,000 sq ft. Optional layouts for Plot B are being reviewed.

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

### Land off Hatfield Lane (Gateway 4), Armthorpe - (818)

#### Overview

Gateway 4 is a well located prominent 30-acre (12ha) (gross) development site situated alongside the A630 and linking directly with Junction 4 of the M18 motorway. The site was acquired by Trebor Developments (backed with funding from Hillwood) in April 2019. Gateway 4 occupies a strategic distribution location situated within a mile of the M18 and Doncaster town centre is within 5 miles to the south west via the A630 Wheatley Hall Road.

#### Commentary

Detailed planning consent was obtained in November 2019 for the speculative development of a 409,000 sq. ft. unit. The unit benefits from 38 loading doors, 83 HGV spaces, 55m deep yard and 1MVA of power.
Update - The developer has commenced speculative development and the unit is now at an advanced construction stage and is due for completion in late 2020.

**Total Site Area:** Approximately 30.11 acres (12ha) (Gross)
**Maximum Building:** Speculative development of a 408,916 sq ft warehouse
**Land Remaining:** 0 acres
**Total Sq Ft Remaining:** 408,916 sq ft

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

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

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

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

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

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

Update - There has been interest in smaller plots at Riverdale Park with discussions ongoing with occupier including Arnold Clark and two drive-thru operators. Furthermore, part of the site is now zoned for an alternative use, leaving small plots available up to 5.68 acres.

We do not consider this site a large scale industrial and logistics park and is likely to be developed out as small to medium sized units or plot sales

**Total Site Area:** Approximately 112 acres (45ha)
**Maximum Building:** 100,000 sq ft
**Land Remaining:** 13.62

**Unity Doncaster, J5 M18 - (418)**

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

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

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

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

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

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

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

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

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

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

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

DHL, High Common Lane, Bawtry

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

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

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

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

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

Conclusion

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

It is important to allocate deliverable land which offers choice to the occupier market to accommodate growth from within the region and attract inward investment as take-up going forward will be directly influenced by availability and choice for the occupier.
The site presents an opportunity for a large-scale allocation immediately adjacent to the motorway network able to accommodate up to 2,600,000 sq ft, resulting in it being of national significance in terms of attracting both local and regional occupiers as well as footloose national requirements. Whilst there is land allocated in the borough for employment uses there are limited sites available that can offer a range of size units and units of such scale. It is equally apparent that there are limited sites capable of offering a single unit of 1,000,000 sq ft in the wider regional market.

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

Yours sincerely

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Iain McPhail
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Note: Any indication of value provided regarding indicative rents or achievable prices is provided for discussion purposes only. It is not, and is not intended to be, a valuation. We would be pleased to undertake the additional necessary research and provide a formal valuation, if required, on the basis of a separate instruction.
Appendix 2: BWB Flood Risk Status
Technical Report, 2020
Notice

All comments and proposals contained in this report, including any conclusions, are based on information available to BWB Consulting during investigations. The conclusions drawn by BWB Consulting could therefore differ if the information is found to be inaccurate or misleading. BWB Consulting accepts no liability should this be the case, nor if additional information exists or becomes available with respect to this scheme.

Except as otherwise requested by the client, BWB Consulting is not obliged to and disclaims any obligation to update the report for events taking place after:

(i) The date on which this assessment was undertaken, and
(ii) The date on which the final report is delivered

BWB Consulting makes no representation whatsoever concerning the legal significance of its findings or the legal matters referred to in the following report. All Environment Agency mapping data is used under special license. Data is current as of February 2020 and is subject to change.

The information presented, and conclusions drawn, are based on statistical data and are for guidance purposes only. The study provides no guarantee against flooding of the study site or elsewhere, nor of the absolute accuracy of water levels, flow rates and associated probabilities. This document has been prepared for the sole use of the client in accordance with the terms of the appointment under which it was produced. BWB Consulting Limited accepts no responsibility for any use of or reliance on the contents of this document by any third party. No part of this document shall be copied or reproduced in any form without the prior written permission of BWB.
1. INTRODUCTION

This document has been produced by BWB Consulting Ltd on behalf of Harworth Estates and presents our observations of the relative flood risk characteristics at the proposed Gateway 180 development at Bradholme Farm, compared to that associated with the Thorne North draft allocation.

The draft Doncaster Local Plan (2015 – 2035) attempts to satisfy the requirements of the NPPF flood risk Sequential Test and Exception Test (paragraphs 156-161), using the Level 1 Doncaster Strategic Flood Risk Assessment Nov 2015 (EIP ref. SDEB13) and the Doncaster Sustainability Appraisal (EIP ref. CSD7). Based on this information the draft Local Plan promotes the allocation of site ref. 001 “Junction 6 M18, Thorne North", as a future employment site, in preference to site ref. 160 “Thorne South Urban Extension, Bradholme Farm”.

On review of flood risk at the two sites it is evident that the basis of the proposed allocation is founded on inadequate information, which has drawn a questionable conclusion and places doubt on the soundness of the Local Plan.

The information used to inform this comparison assessment is that provided from recent consultations with the Environment Agency and Isle of Axholme Drainage Board.
2. **Basis of Current Draft Allocation**

2.1 With respect to the proposed Examination of the draft Local Plan and flood risk Sequential Test considerations, there are 4 key points of reference:

- NPPF/NPPG
- Level 1 Strategic Flood Risk Assessment 2015 (SDEB13)
- Sustainability Appraisal (CSD7)
- Doncaster Draft Local Plan 2015-2035
- Doncaster Council Topic Paper 2: Flood Risk (DMBC2)

**NPPF/NPPG**

2.2 NPPF (2019), sets out the requirements of the Flood Risk Sequential and Exception Test and are clearly presented in paragraphs 156 to 161 of the Framework, and in the context of the production of Local Plans, these paragraphs can be summarised as follows:

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>Statement</th>
</tr>
</thead>
<tbody>
<tr>
<td>156</td>
<td>Policies should be informed by Strategic Flood Risk Assessments</td>
</tr>
<tr>
<td>157</td>
<td>All plans should apply a sequential risk-based approach to the location of development (applying the Sequential Test)</td>
</tr>
<tr>
<td>158</td>
<td>Steer new development to areas with lowest risk of flooding</td>
</tr>
<tr>
<td>159</td>
<td>If it is not possible to locate development to low risk areas then Exception Test may apply</td>
</tr>
</tbody>
</table>
Exception test should be informed by a Strategic Flood Risk Assessment when applied to Plan production. To pass the Exception Test need to demonstrate:

- Wider sustainability benefits which outweigh flood risk
- Development will be safe, not increase flood risk and where possible reduce flood risk.

Both element of Exception Test should be satisfied for development to be allocated.

The application of the Exception Test is further clarified in NPPG (Paragraph: 027 Reference ID: 7-027-20140306) which reinforces the requirement for development to pass both parts of the Exception Test, or to come to the sole conclusion that “Development is not appropriate and should not be allocated”. Our interpretation of this is clear and unambiguous, that the plan should not be allocating development sites if the evidence base is inadequate to prove the sites a) provide wider sustainability benefits; and b) are safe, do not increase flood risk and where possible reduce flood risk.

Level 1 SFRA

In applying the Sequential Test the Plan is informed by the Level 1 Strategic Flood Risk Assessment Nov 2015 (ref.SDEB13). This assessment provides a high-level overview of flood risk within the authority boundary, which is reflecting the Environment Agency's own Flood Zone mapping for the area. This illustrates large areas of Flood Zone 3 (theoretical high risk zone) in the north-eastern quarter of the authority area, representing a combination of the theoretical floodplains of the River Trent, River Don, River Torne and their tributaries. It should be stated that these Flood Zones, as confirmed by the Environment Agency, are precautionary and in certain areas such as south of Thorne, (area maintained by Doncaster East IDB), it is acknowledged by the EA and IDB that the Flood Zone 3 designation does not reflect reality. The SFRA places both sites 001 and 160 as being within Flood Zone 3a.

Sustainability Appraisal

In further applying the sequential approach to site allocations and to satisfy part (a) of the Exception Test, a Sustainability Appraisal has been carried out (August 2019 CSD7.1, followed by Addendum March 2020 CSD7). Flood Risk considerations do feature within the wider SA within category 11A, with scoring attributed to the following items.
Main River Flooding
Surface Water Flooding
Areas Benefiting from Flood Defences
EA Flood Warning or Alert Area

2.6 The Sustainability Appraisal simply incorporates the findings of the Level 1 SFRA for these 4 categories, as part of the scoring within the wider assessment, but does not improve upon the accuracy or ambiguity of the Level 1 baseline flooding information. Therefore, it continues to refer to information which is known to be inaccurate. In addition, it should be noted that scoring applied to the category of “Areas Benefiting from Flood Defences” has been incorrectly interpreted within the SA as contributing positively towards the wider sustainability credentials of a site. It is wholly inappropriate to suggest a low-lying site located immediately adjacent to a flood defence structure, where the consequence of a breach or overtopping is high, should be somehow regarded as being more sustainable than a site on the edge of the floodplain with a relatively slow speed of onset and shallow flood depths.

Draft Local Plan

2.7 Paragraph 14.8 of the Draft Local Plan, which underpins the proposed Policy 58 on Flood Risk Management, states in the context of Sequential Tests for new development the following:

“Any sites identified in the same flood risk zone should also be considered further as there could still be instances where the site(s) identified may be sequentially preferable to the application site, for example speed of onset, duration, velocity, or depths.”

2.8 This clearly suggests the use of flood risk metrics such as depth and velocity of flood as being a way of considering sequential preferability of development sites. This is a reasonable approach, but due to the absence of a Level 2 SFRA within the supporting evidence informing the allocation process, then insufficient consideration has been made to the detailed flood risk characteristics of the various sites considered and instead broad assumptions have been made, wholly based on the Flood Zones.

Doncaster Council Topic Paper 2

2.9 This paper has been produced by Doncaster Council, to assist the Inspector’s examination of the draft Plan and it provides a useful summary of Sequential Test and Exception Test requirements. It sets out the limitations of the current baseline flood risk information in para 2.6, which states that the Level 1 SFRA “does not provide detailed information to comply with part 2 of the exception test”. In other words, there is
insufficient information within the supporting evidence-base to understand whether allocated sites are a) safe, b) able to be developed without increasing flood risk elsewhere or c) able to deliver reduction in flood risk for the wider area. This is a significant hole within the evidence-base which places a material doubt on the suitability and deliverability of the allocations.

2.10 This observed position warrants the urgent need for Level 2 SFRA to address the deficiency in the evidence-base. This is acknowledged in para 3.4 of the Topic Paper, but also highlights the difficulty in completing a Level 2 assessment now due to the extended EA programme for producing new river models for the area. It is evident that the Environment Agency would seek to produce new models for catchments to improve upon their resolution and accuracy. That said, the council are still wishing to proceed with the adoption of the Plan irrespective of their awareness of the forthcoming critical information which will supersede the current evidence-base and possibly alter the outcome of the allocation process. In para 3.4 the council commit to doing a Level 2 SFRA at the earliest opportunity, but that is likely to be after adoption of the Plan when allocations are fixed irrespective of the findings in the new SFRA, which may contradict previous findings in flood sensitive areas. The Council have stated a clear understanding of the modelling work currently being undertaken by the Environment Agency in the Topic Paper and are therefore knowingly wishing to proceed with inadequate information which has been material in the site allocation process.

2.11 Using output from the flood risk comparison assessment presented in Section 3 below, this further reinforces the view that in using inadequate information the Council have drawn an incorrect conclusion as to the allocation of Site 001 in preference to Site 160, as the latest flood risk data contradicts the findings of the draft Plan.
3. COMPARISON ASSESSMENT

3.1 The following table provides a sequential approach to assessing severity of flood risk based on severity of risk. All sites in the Thorne area are subject to a complex range of flood mechanisms.

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Thorne North (Site 001)</th>
<th>Gateway 180, Bradholme Farm (Site 160)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Flood Zone</td>
<td>Site 001 is situated in Flood Zone 3a at risk of flooding from the River Don. The whole of the site is affected by this flood zone designation (see figure 1 below).</td>
<td>The site is predominately shown to be in Flood Zone 3a, with a proportion through the centre of the site being Flood Zone 2 (see figure 2 below).</td>
</tr>
</tbody>
</table>

![Figure 1 - Site 001 Flood Zone](image1)

The Flood Zone mapping places the site in an “Area Benefitting from Defences”. This is correct as the River Don is immediately adjacent to the site and is situated.

![Figure 2 - Site 160 Flood Zones](image2)

Consultations with the Environment Agency and Isle of Axholme Drainage Board have placed doubt on the
adjacent to the defence embankment. The extent of Flood Zone 3a designation (area at risk in the 1 in 100 year event) across the site is also correct as ground levels within the site are circa 3.5m below the top water level within the River Don channel, meaning that without the defence line the site would be wholly inundated in a 1 in 100 year event.

The presence of a 4m high defence line and the site being located near to the toe of the defence structure, does mean that the consequence of breach or overtopping is likely to be significant and a danger to life.

The Environment Agency state that the embankment defences are in a fair condition. However, the defences protecting the Thorne North site have a discontinuity at Ferry Road, in which is located a manual flood gate to allow the road to be closed and defences to be completed in the event of flood warning.

Figure 3 - Photograph of Flood Gate at Ferry Road

accuracy of the Flood Zones, which appear to unrealistically project flood levels from the River Trent some 15km away. As confirmed in our discussions with the Environment Agency, The Trent would not be a source of flooding to this site due to its remoteness and the finite volume of flood water generated by the catchment.

In addition, the flood zones make no consideration to the extensive IDB system network of drains and pumping stations in the area. Feedback from the Drainage Board on the key drainage assets near to the site are that they have been recently improved and are well maintained.

The main source of fluvial risk to the site is from a gradual backing up of the River Torne and its tributaries into isolated parts of the site, but with the majority of the site being above predicted flood levels. Risk from this mechanism is described in the next section.

Therefore, these consultations together with the latest modelling output presented in the next section confirm the flood zones are not a reasonable representation of the true risk in this location and therefore relying on a level 1 SFRA to inform a sequential test between two Flood Zone 3a sites, is not appropriate. This reinforces the view that flooding is highly complex in the Doncaster Council area and therefore, as a minimum, the draft Local Plan should be informed by a Level 2 SFRA.

Based on these findings, BWB are in the process of submitting a formal Flood Zone challenge to the
The presence of this gate requires an intervention in advance of a flood (in response to flood warning) to ensure the continuity of defences and protection of the Thorne North site. The consequence of a failure in structure or procedure during a flood is explored in the next section.

Environment Agency, for the flood zones to be updated in this location to better reflect the latest flood predictions.

| Flood Model Prediction | From our consultations with the Environment Agency we have established that, for the Thorne North site, the most appropriate and up to date model predictions come from the Environment Agency’s 2016 Upper Humber study which includes the relevant reach of the River Don. This confirms in normal operating conditions with the manual flood gate closed at Ferry Road, that the site and surrounding areas are defended to a 1 in 200 year standard. As part of this EA study some breach analysis was undertaken to understand the residual risk associated with a failure of the defence line. Results from this breach analysis are included as Appendix A and confirm flood depths in the order of 2m and velocities of circa 1m/s across the site, which would be categorised under standard flood hazard methodology as “Danger to All”. Figure 4 below provides an extract of the flood breach results associated with an event of Ferry Road Bridge flood gate failing to be shut prior to a flood event; i.e a failure in procedure. An actual structural failure of the flood gate or embankment during the peak of a flood event would cause a more instantaneous wave of flooding across the site which would further increase flow velocities and the hazard rating. | From our consultations with the Environment Agency we have established that, for Bradholme Gateway site the most appropriate model to refer to is the Environment Agency’s River Torne Hazard Mapping Study 2018. This model includes a representation of the South Soak Drain which passes through the site. The latest flood predictions places the western portion of the site in 1 in 100 year floodplain, a portion to the south within the 1 in 1000 year floodplain and the remained (majority of the site) outside the 1 in 1000 year floodplain. Figure 5 below provides a summary of these current model predictions. As can be seen on Figure 5 the perception of risk is much less when reviewing the latest available data compared with relying on the current Flood Zones, as is the case with the Level 1 SFRA, which are considered overly precautionary for this location. |
Figure 4 – Ferry Road Bridge gate left open.

Again this places some doubt on the approach taken within the Doncaster Council Sustainability Appraisal, to give points and greater weighting to a site that is in an area benefiting from defences over a site which may not be defended but where the consequence of flooding (depths, velocities etc) is not going to impose the same risk to life.

Figure 5 – Output from Latest EA model
### Sustainability and Viability

To mitigate risk to the site, the SFRA states a recommended planning obligation for this area to raise FFLs of new buildings to 4.4mAOD. This level is reflected in the scheme proposals currently being determined in a standalone planning application (ref. 16/02136/OUTM). It should be noted that the updated breach level predictions for the site of 4.53mAOD are above this historic recommended FFL. That said even with the lower FFL requirement, with existing ground levels being between 2.3 and 2.8mAOD there is a requirement for a significant import of earth material to the site to raise levels sufficiently. This would necessitate the import of circa 2 million tonnes of fill material, which equates to circa 100,000 construction phase lorry movements.

There is significant doubt placed on such a need in terms of its sustainability and viability. Such considerations do not feature in the Sustainability Appraisal or site allocations.

With respect to delivering a Sustainable Drainage Strategy, Figure 6 below shows the masterplan for site 001 associated with the planning application currently being determined. This clearly illustrated a density of development which provides minimal sacrificial landscaping area to deliver SuDS features such as ponds and swales. This does not embrace the opportunity to contribute to a reduction flood risk elsewhere and deliver a sustainable scheme in line with NPPF para 160 and in line with assumptions made in the Sustainability Appraisal.

The reduced concern over flood risk at the site, as a result of the output from the EA’s latest model shown in figure 5, is illustrated by the EA’s view on recommended FFLs at the site. Although the SFRA makes reference to FFLs in the order of 4.4mAOD, from pre-app consultations with the EA and Drainage Board they would not propose to enforce this requirement in this area and would be instead content with FFLs 600mm above the latest flood predictions (FFLs at circa 2.6mAOD). This means that due to the amount of land located outside the latest floodplain prediction it is achievable to deliver the correct FFLs, sufficient floodplain compensation to ensure no net loss of floodplain volume, and remove any unsustainable requirement to import significant volumes of material by balancing the earthworks cut and fill operation.

Clearly this is a more sustainable approach to the delivery of development, which again does not feature in the scoring system within the Sustainability Appraisal, which renders the supporting evidence to the allocation process within the draft Local Plan as being unsound.

In terms of Sustainable Drainage, Figure 7 below provides the current masterplan for site 160, and highlights the significant proportion of the site dedicated to SuDS and wet landscaping. This amount of land given up to the Water Environment demonstrates what is possible in maximising the potential of a site’s environmental and sustainability credentials whilst delivering on employment needs. This should be a key consideration in any Sustainability Appraisal, but is unfortunately omitted from the Council’s appraisal.
Flood Risk - Sequential Status Comparison Technical Note, May 2020

BGT-BWB-ZZ-XX-RP-YE-0005_FRTN

Figure 6 – Current masterplan for Site 001

Figure 7 – Current Masterplan for Site 160

Flood History

The Thorne North site is recognised to have flooded historically as recently as 2007.

The site has the following warning codes on the EA Flood Warning Service:

“123WAT979” which is “Tidal River Ouse, Don and the Dutch River catchment”. There are 10 instances of a flood alerts being raised for this site over the last 8 years; on the dates below.

> 27/11/11

The Gateway 180 Bradholme Farm site has no history of flooding.

The site has the following warning codes on the EA Flood Warning Service:

> “123FWB058” which is “River Don and Dutch River from Moorends to Rawcliffe Bridge”. There are no instances of a flood warning being raised for this site.
The site is clearly subject to frequent risk from the River Don as evidenced by the history of flood warnings.

<table>
<thead>
<tr>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>27/11/11</td>
</tr>
<tr>
<td>04/12/13</td>
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<td>04/01/14</td>
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<td>31/01/14</td>
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<td>02/02/14</td>
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<tr>
<td>13/08/14</td>
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<tr>
<td>12/01/17</td>
</tr>
<tr>
<td>01/02/18</td>
</tr>
<tr>
<td>28/09/19</td>
</tr>
</tbody>
</table>

- “123FWT057” which is “River Don at Moorends and Thorne”. There are no instances of a flood warning being raised here.
- “034WAB421” which is “Tidal Trent wider floodplain from Gainsborough to the Humber confluence”. There are no instances of a flood alert being raised for this site.

There is no history in the records of flood alerts/warnings being raised for the site.
4. **SUMMARY**

4.1 With the interaction of the various tidal/fluvial rivers and Drainage Board network, flood risk is a highly complex issue within the Doncaster borough, and far more complex than most other areas of the country. Therefore, it should be a key consideration within the draft Local Plan for the allocation of future development sites to be well informed by flood risk constraints. Unfortunately this is not the case and the Draft Plan has been put forward for examination with the minimum amount of supporting evidence on flooding, comprising a 2015 Level 1 SFRA. This SFRA is wholly based on the EA flood zones, which are very precautionary in places and should not be regarded as a definitive picture of the risk, as their representation is too simplistic for an area where flooding is known to be so complex.

4.2 To ensure that the Local Plan and the site allocation process are robust, we would regard the inclusion of a Level 2 SFRA as being essential part of the evidence base.

4.3 To illustrate why this should be the case, this technical note highlights the flood risk characteristics between site 001 (which has been allocated for employment within the draft plan) and site 160 (which failed to be allocated). It clearly compares certain flood risk characteristics between the 2 sites and places significant doubt on the adequacy of the allocation process to satisfy the Sequential Test requirements within NPPF (para 156-161). Based on a more detailed review of flood risk, beyond that presented in the Level 1 SFRA, we would conclude that site 160 should be regarded as sequential preferable compared with site 001 for the following reasons:

1. Site 001 is reliant on flood defences including flood warning and closure of a flood gate at Ferry Road for prevention of flooding from the River Don. It is therefore at risk of sudden inundation in the event of defence failure. Isolated parts of site 160 are at risk from backing up of local fluvial sources. The resulting flooding mechanism is gradual with relatively shallow depths of flooding, and would be regarded as being of low hazard and no risk of sudden inundation of the site.

2. Site 001 is fully within flood zone 3a and this is validated by its low lying ground levels (circa 2m AOD) relative to the flood levels within the River Don directly adjacent to the site (flood level circa 6m AOD). However, based on the latest Environment Agency modelling information site 160 is largely outside the 1 in 1000 year flood envelope. BWB are in the process of making a formal application to the Environment Agency to amend the flood zones at this location to better reflect the latest flood model data.

3. Site 001 has a history of flooding and has been subject to 10 flood warnings/alerts over the last decade, whereas Site 160 has no history of flooding and no history of flood warnings/alerts.
4.4 The proportion of flooding affecting Site 160 is manageable within the masterplan and can be suitably compensated for, thereby ensuring that the flood risk can be managed on site without any adverse impacts on third party land. The site can also be delivered in a manner that will ensure that buildings remain safe for the lifetime of the development by delivering building floor levels with a 600mm freeboard to the 100 year + climate change level (approximately 2.6m AOD). An earthworks analysis has been undertaken to check that this can be delivered sustainably at Site 160 with an earthworks balance and no need to import any earthworks fill materials to raise levels.

4.5 The flood risk assessment submitted in respect of the planning application for Site 001 suggests mitigating flood risk by delivering finished floor levels of buildings at 4.4m AOD. An earthworks analysis has identified that this will require the import to the site, by road, of around five hundred thousand cubic metres (around 2 million tonnes) of earthworks fill. This will lead to around 100,000 lorry movements and will not be compliant with the sustainability requirements of the exceptions test.

4.6 The Sustainability Appraisal used to inform the allocation process does not make reference to construction related sustainability as a consideration of the merits of a site which needs significant upfilling to make it safe compared with another which does not. Because the Sustainability Appraisal only makes reference to the simplified Flood Zone information presented in the Level 1 SFRA then it is evident that the allocation process has not been informed by a sufficiently accurate and robust evidence base.

4.7 The application for Site 001 provides minimal compliance with Sustainable Drainage guidance and fails to maximise the opportunity to deliver environmental enhancement and a reduction in flood risk elsewhere (NPPF para 160). The provision of SuDS and environmental enhancement should be a key metric of the sustainability credentials of a site. Unfortunately, the potential for delivering sustainable drainage at each site is not considered within the Sustainability Appraisal metrics.
APPENDIX A

EA RIVER DON BREACH MODELLING OUTPUT FOR THORNE NORTH AREA
Appendix 3: DLP Report (2020)
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Contents

1. Background .................................................................................................................. 1
2. Local Policy ................................................................................................................ 3
3. Sustainability Appraisal ............................................................................................. 6
4. Site Selection ............................................................................................................. 8
5. Thorne North ............................................................................................................. 10
6. Conclusion .................................................................................................................. 15

Appendices

None
1. BACKGROUND

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

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

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

1.2.2 Paragraph 102 of the Framework states:

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

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

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

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

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

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

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

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

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

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

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

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

Within this context, applications for development should:

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

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

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

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

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

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

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

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

2.1 BACKGROUND

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

2.2 CORE STRATEGY

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

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

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

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

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

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

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

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

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

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

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

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

Existing Land Use

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

2.3 LOCAL PLAN SUBMISSION

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

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

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

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

2.3.3 With Policy 3 stating:

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

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

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

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

- Proposals are required to meet the following requirements:

  A) New development shall make appropriate provision for access by sustainable modes of transport to protect the highway network from residual vehicular impact. The Council will work with developers to ensure that:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Table 4.1 – Summary of Appendix A3 Accessibility Criteria

<table>
<thead>
<tr>
<th>Mode</th>
<th>Notation</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rail</td>
<td>+</td>
<td>Site is within 800m of a train station</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>Site is located between 800m and 1.2km of a train station</td>
</tr>
<tr>
<td></td>
<td>-</td>
<td>Site is located over 1.2km from a train station</td>
</tr>
<tr>
<td>Bus</td>
<td>+</td>
<td>Site is within 400m of a bus stop on the high frequency bus network</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>Site is located 400m to 800m from a bus stop on the high frequency bus network</td>
</tr>
</tbody>
</table>
4.3.2 Despite the Framework requiring priority first to pedestrians and cyclists the Site Selection Methodology does not include pedestrians, nor does it consider a negative option for sites which are not reasonably accessible by cycle.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

5.4 DISTANCE TO A BUS STOP

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

5.5 ACCESS BY CYCLE

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

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

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

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

**Extract 5.1 ‘Cycle’ Route Network**

![Map of Thorne showing cycle routes and key](image)

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

**Extract 5.2**

![Network key for Thorne cycle routes](image)

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

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

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

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

5.6 THORNE NORTH SUMMARY

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

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

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

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

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

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

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

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

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

6.2 PROPOSED CHANGE

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

- The Site Selection Methodology for employment sites should include access by those with disabilities, reduced mobility and pedestrians, in line with national policy and Local Plan policies CS1, CS2B, CS14 and the overarching Local Plan objective with regard to Transport and Accessibility;
- Actual user experiences should be assessed within the Site Selection Methodology, including severance and the safe and suitable access by the assessed mode;
- The positive scoring for Thorne North in respect of rail and cycle access should be amended to a negative scoring in light of the evidence provided; and
- Alternative employment sites with safe and suitable access for all should be reassessed and the Site Selection updated to reflect these changes.
A CARBON NEUTRAL COMPANY
FOR THE PLANET AND FOR THE FUTURE
Appendix 4: Site 160, Bradholme Pre Application.
Melvyn Roberts
Doncaster Council
Development Management
Civic Office
Waterdale
Doncaster
DN1 3BU

18th June 2020

Dear Mr Roberts,

BRADHOLME FARM/ GATEWAY 180 – UPDATED PRE-APPLICATION ENQUIRY

Further to our pre-application enquiry in May 2019, we would like to update our enquiry with an amended masterplan and updated Flood Risk Assessment for our proposed development at Bradholme Farm, Thorne, Doncaster, DN8 5SB.

We have taken the decision to amend our masterplan following the feedback that we received from our public consultation event in October 2019 and the technical responses to our Environmental Statement (ES) Scoping Opinion.

In parallel with our involvement with the progression of the draft Local Plan’s Examination in Public, we aim to undertake additional pre-application discussions with Officers in relation to the scheme specifics.

Updated Masterplan

Following comments at the public consultation event and technical responses to the ES Scoping Opinion we have taken the decision to update our illustrative masterplan. I attach the amended masterplan for your information. In summary, the key amendments include:

- Amended red line/ site area – takes into account the River Torne flood model
- Creation of Northern and Southern development areas
- Northern area, located in closer proximity to settlement of Thorne includes opportunities for smaller commercial buildings, creating opportunities for local businesses to expand and the opportunities for more advanced manufacturing occupiers
- Southern area, creates opportunities for larger scale buildings further away from the residential areas of Thorne and retains attractiveness of site to large scale commercial operators
- Creation of a green/ blue corridor 1km in length x 200m wide. This creates multiple opportunities for leisure, recreation, visual amenity and biodiversity
• Retention of existing vegetation where possible to create screening and mitigation for the proposals

The proposal is for the erection of 2,632,000 sq ft (244,555 sq m) of employment space (a mix of B1(c), B2 and B8 uses with ancillary office space, including necessary earthworks, construction of access roads, landscaping, and flood risk and drainage works.

The proposals show there will be two linked vehicular access points into the site, one from the A18 (HighLevels Bank) and another from Tudworth Road.

The updated illustrative masterplan has been informed by technical assessments by BWB Consulting, meetings with the Internal Drainage Board (IDB) and comments from the Environment Agency (EA).

The masterplan retains the existing ‘blue/ green’ corridor through the site and the on-site drainage attenuation is placed within this large corridor, creating a visual amenity value and biodiversity and habitat creation opportunities.

Sustainability and Active Travel

Since the public consultation event, further assessment work has been undertaken to further enhance the accessibility of the site by all modes of transport. Additional measures have been incorporated to promote sustainable transport modes to and within the site. The active travel access points have been supplemented by a sustainable travel link between the northern and southern phases. Initially it is envisaged that this will incorporate a walking and cycling route, with provision of a bus link once the site reaches a critical mass to support a service into the site. In the intervening period, new bus stops are proposed on Tudworth Road which link to the active travel routes that run through the site. The provision for public transport services will be discussed and agreed with SYPTE.

We are at the cusp of significant changes in the manner in which we travel, which include enhanced vehicle technologies using the 5G networks and a commitment by Government to ban petrol, diesel and hybrid cars by 2035. As the development proposals are built out they will incorporate appropriate infrastructure to support the changing face of our transport networks.

Traffic analysis has been undertaken which suggests that the southern parcel could require a roundabout site access. The roundabout site access has been sized to operate with significant spare traffic capacity with the development fully built-out, thereby minimising delays to vehicles on the A18. The northern access is proposed to be a ghost-island priority T-junction, which similarly is forecast to operate with significant spare traffic capacity with the development fully built out, thereby minimising delays to vehicles on Tudworth Road.

Offsite junction assessments are to be undertaken to assess the cumulative impacts of the development and other committed developments nearby. A package of offsite highway works will be proposed to mitigate the traffic impacts to an acceptable degree.

Overall, the proposals will seek to ensure that safe and suitable access to the site can be achieved for all users.

Flood Risk and Drainage

Extensive modelling analysis has been carried out on our behalf by BWB to understand the risk to the site and to inform the illustrative masterplan. An updated Flood Risk Assessment has been prepared by BWB and is attached to this letter.

We have established that the Flood Zones in this area have been derived from unrealistic precautionary information associated with projecting the top water level in the River Trent circa
15km away and localised failures of IDB pumping stations. From positive consultations with the Environment Agency and Doncaster East IDB, we have established a much lower risk to the site to that suggested by the flood zones, with the Environment Agency's 2018 model of the River Torne considered to be the most realistic reflection of risk for the area, output from which is shown in the figure below:

As described above, we have amended the redline for the application site to avoid encroachment on the area at most risk at the northern extremity of the site. In delivering a development solution and raising development plots above predicted flood levels, the principle of volumetric floodplain compensation is acceptable and sufficient area has been sacrificed within the masterplan to provide a lowered compensation area to ensure no loss of floodplain storage, which also provides the potential for reducing flood risk in the area, as per the requirements of NPPF.

Other features of the masterplan which are informed by the hydrology is the provision of a 9m maintenance exclusion zone from both banks of the watercourses passing through the site, as per the requirements of the IDB, which also contribute to the added benefit of providing uninterrupted green corridors through the site and maximising ecological potential. In addition, the proposed surface water drainage within the site will comprise localised SUDS solutions from the plots terminating into large balancing ponds to hold back runoff from the site and discharge into the watercourses at lower peak rate to that of the undeveloped greenfield site. Thereby contributing to a net reduction in flood risk as well as the opportunity to maximise their habitat potential through appropriate design and planting.

Our analysis concludes that the Bradholme Farm site should be regarded as sequentially preferable compared to Site 001 (Thorne North) for the following reasons:

• Site 001 is reliant on flood defences including flood warning and closure of a flood gate. It is therefore at risk of sudden inundation in the event of defence failure. Whilst isolated parts of Bradholme Farm could be at risk from backing up of fluvial sources, the resulting potential for flooding would be gradual with relatively shallow depths of flooding and would be regarded as being of low hazard with no risk of sudden inundation of the site.

• Site 001 Thorne North is fully within Flood Zone 3a. The latest Environment Agency modelling information demonstrates that Bradholme Farm is largely outside the 1 in 100 year flood envelope. BWB are in the process of making a formal application to the Environment Agency to amend the flood zones in this location to reflect the latest flood model data.

• Site 001 has a history of flooding and has been subject to 10 flood warnings/alerts over the last decade. Bradholme Farm has no history of flooding and a single flood warning.
Flood risk in relation to Bradholme Farm can be managed on site without any impacts on third party land. Development can be delivered in a manner that ensures that buildings remain safe for the lifetime of the development. There is no requirement to import any earthwork fill material to site to raise levels.

The updated masterplan further strengthens our case that the site is the most deliverable site in this part of the M18/ M180 Corridor. We would be happy to meet to discuss our updated illustrative masterplan and receive your written feedback.

Yours sincerely

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