Matters 8
Q8.4 Are Employment Allocations suitably located and likely to be developed as assumed in the plan?

Site 001 is not suitably located.
The planning application 16/02136/OUTM on going now for over five years still has unresolved issues with Highways England which state they are working with the developers and local authorities to resolve outstanding issues.

This area of land is an island detached from the main town of Thorne and Moorends, over a mile away from existing employment sites, it can not be classed as an urban extension, development of Site 001 would not be an expansion of a built up area, it is not an employment site that will attract employees on foot / cycle / disabled because of its inaccessibility and situated a distance away from Thorne and Moorends.

This is 183 acres of 3a good agricultural land which will be lost if developed, at a time when it is of the upmost importance to preserve the land we need to feed the growing population needed to sustain the uk.

Consultation reply (Planning Application 16/02136/OUTM) Air Quality September 2016 Lisa Croft states

Additionally, Thorne is sensitive to air quality impacts as concentrations of nitrogen dioxide are already fluctuating around the annual mean objective therefore putting the area at risk of declaration as an Air Quality Management Area (AQMA).

While I appreciate the arguments made in the AQA and the effort to show worst-case assumptions along with the standard methodology I have concerns that at some point over the lifetime of the development air quality will worsen to a point beyond the objectives.

With consideration to the above I cannot support the application on air quality grounds.

Since the above was submitted by Lisa Croft the existing employment site we have in Thorne has seen development of two B8 warehouses, Lidl, Aldi, B&M all generating additional heavy goods vehicles and customers cars all adding to the already poor air quality in this area of Thorne, the development of Site 001 would no doubt increase the already poor air quality we have, and put the area in danger of Air Quality Management Area. Justification needed from Doncaster Council that development in this location will not increase poor air quality, air quality management is their responsibility Doncaster Council has a duty of care to its residents, by allowing development in this location they fail that duty and put members of the community that live, visit this area in danger of nitrogen dioxide inhalation.

Core Strategy Policy 3, states that Countryside will be protected in the east of the borough, it will continue to be protected throughout the Protection Policy Area, proposals which are outside development allocations will only be supported where they

Protect and enhance the countryside

Not create or aggravate highway amenity problems

Preserve the openness of the green belt or Countryside Policy Protection Areas

The proposal to allocate / develop Site 001 is contrary to Core Strategy Policy 3 for the above reasons.

Distribution/ warehouse units of gigantic size and height will overshadow and block out sunlight to all residential properties that neighbour this land, justification needed from the council with regard to employment land they suggest is needed for development of distribution/ warehousing when we have existing employment sites in Thorne where there are two B8 units still not occupied eighteen months after being completed still these two units are advertised To Let, Junction 4 Armthorpe again B8 unit completed yet unoccupied, these buildings are stood empty yet there are plans for more of these units to be built.

Flood Risk.
Site 001 - Thorne North Junction 6 is in flood zone 3 high probability of flooding, vulnerable area. The Councils Topic Paper 2 Flood Risk

2.2 Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future) where development is necessary in such areas the development should be made safe for its lifetime without increasing flood risk.

Where is the justification that DMBC have provided that states the development of this site is necessary? Where is the explanation and guarantee from DMBC how they plan to make this development safe for its lifetime without increasing flood risk?

National Policy makes it very clear that flood risk in the plan must be managed through a sequential risk based approach to make sure all new developments are in areas at the lowest risk of flooding where this is not possible then a Level 2 Strategic Flood Risk Assessment must be carried out. The Councils Topic Paper 2 Flood Risk states:

The council acknowledges that in order to assess the likelihood of potential sites passing the exemption test and therefore being compliant with the NPPF we must produce a Level 2 Strategic Flood Risk Assessment once the Environment Agency models are completed in order to be consistent with National Policy. By allocating Sites without a Level 2 SFRA in an area with such complex flood issues is inappropriate.

The plan has been prepared without a Level 2 SFRA, this is a crucial important element with regard to the site selection process and consistent with the requirements of National Policy.

The council are proposing this site for major development 180 acres of land in flood zone 3 high probability of flooding without the mandatory tests as stated above.

This is an area at high risk of flooding, although it does benefit from flood defences where as alternative sites don’t the reason being is because this is the only vulnerable area/site in danger of flooding from a main river, alternative sites are not at high risk of flooding from main rivers so do not need flood defences to prevent flooding. Why have the council proposed the most vulnerable site at risk of flooding for employment land? The distance from the banks of the River Don to the proposed entrance (Lands End Road) to Site 001 is 50m (correct measurement) Jubilee Bridge which is a low point was in danger of overtopping in November 2019 and March 2020 resulting in flood warnings in force in this area with the travellers camp having to be quickly evacuated, information received from the EA to myself states that there were concerns that water was sleeping through the flood embankment adjacent to Jubilee Bridge, as it was going to take a while to get an engineer to the site to inspect it the decision was taken to evacuate the travellers camp, if overtopped this land would have acted as a floodplain potentially saving existing properties from flooding, the devastation the flooding left homes and business in the nearby village of Fishlake in November 2019 should not be ignored, these are very important facts and should be taken into account, due to climate change river levels are expected to rise, we are to expect increased flooding in vulnerable areas, this and the surrounding areas are at real risk of flooding, the land should be left as agricultural farm land to be used if required as a natural flood plain. Development in this area is not sustainable, in the long term development should be located at an alternative site, to a more sustainable location less chance of flooding/harm to homes and businesses.

Photo received from EA, November 2019, Area proposed on planning application for Site Entrance issued a Flood Warning

Site 001 is outlined in black, the EA stated “the area at risk from water seeping through the embankment is the blue warning area” which as shown on the map is the part of site 001 and proposed entrance, other areas shown included in this flood are across the M18 motorway, areas of Thorne and Moorends including the railway line.

Site 001 fails the sequential test “the aim of the sequential test is to steer new development to areas with the lowest risk of flooding, development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding” there are other sites of similar size in less vulnerable areas with a lower risk of flooding, Site 160 to the south of Thorne is of similar size it is less vulnerable it is of significant distance from the River Don and River Trent with motorway and railway barriers in between the rivers and site, the Environment Agency and Internal Drainage Board have confirmed Site 160 is located outside of the area of risk of flooding from main rivers and that the main source of flood risk would be due to potential failure of a
pumping station, so therefore a flood defence is not needed to protect it. With regard to flood risk Site 160 is much less vulnerable than Site 001, what justification can the council give for proposing Site 001 which fails the sequential test over an alternative site that is less vulnerable and in danger of flooding?

The map from the EA shows areas of the site and opposite the site flooding in June 2007 (green areas) also areas directly opposite the site flooding in November 2019 (purple areas)
This EA map shows the “breach location” on the banks of the River Don.
Because of the breach at this lower point on the River Don embankment the field next door to my property and also a vast area of my land flooded, the field and my land are directly opposite site 001 this land remained flooded for over two weeks, this area of land again flooded in March 2020.
The Environment Agency have not completed the Hydraulic Modelling for this area, the evidence and information provided by this is crucial to the allocation of sites for employment and housing and needs to be acknowledged, yet the council have stated in the draft plan that “the modelling is complete and that it’s given a better understanding of the area “ to state this is incompetent and erroneous of the council.

Because this area North of Thorne is a vulnerable area situated so close to the River Don, the council needs to justify developing Site 001 will provide wider sustainability to the community that outweigh the flood risks, the development will be safe for its lifetime taking into account vulnerability of its users without increasing flood risk elsewhere and where possible reduce flood risk overall?

Justification is required from the council that local community’s homes and businesses get a guarantee that by major development of Site 001 homes and businesses will not flood, the council has to be accountable, these policies are put in place for a reason and should be adhered to.

Site 001 is not suitably located
Accessibility for pedestrians/ cyclists/ disabled
Site 001 Thorne North is not easily accessible from the main urban areas and the main town of Thorne and Moorends, it is located outside the main town away from the main urban area by over a mile, not easily accessible, the landowners agents admits that “the site is relatively isolated from main residential areas of Thorne and Moorends and the railway line and M18 are barriers “

To access the site from Thorne and Moorends or from Thorne North and Thorne South railway station employees would have to travel on foot/ cycle, after five years a safe cycle/ pedestrian footpath has not yet been identified, in order to get to Site an employee would have to cross two uncontrolled crossings on the slip roads of the M18 motorway at Junction 6 twice a day, travel along the A614 Selby Road a busy A road, 60mph, high speed users of heavy goods vehicles, partly unlit narrow footpaths (not wide enough to support a cycle path) which narrows considerable as you nearer the site, they would then cross the A614 at an uncontrolled crossing with limited views left and right to enter the site. Employees from Moorends travelling by foot/ cycle would by human nature take the shortest/ quickest route this would mean additional danger to their journey by them having to cross one of the unmanned level crossings between Thorne / Moorends and Site 001, they quote in a consultation reply to planning application 16/02136/OUTM “we would appreciate clarity and assurance from the developer that there is no intention to establish pedestrian links between the site and this area that may lead to an increase in usage of these crossings.”

We are all encouraged to walk/ cycle to places of work more now than ever because of climate change, Increased footfall of this route from Thorne to Site is likely to increase high risk situations, danger to the users both Road and pedestrians. Thorne North proposes 2000 - 3700 jobs the potential for high increase in footfall crossing busy motorway slip roads put many lives in serious danger.

Because of the proximity of the site and the undesirable dangerous pedestrian/ cycle route proposed by the landowners development on this site would very much be road dependent because of its detached position situated some distance away from Thorne and Moorends on the wrong side of the motorway, I understand a small percentage of jobs will be “offered” to the local community but travelling on foot/ cycle would not make it inviting/ desirable for the local community because of the unsafe dangerous access to it, the jobs it creates will be for whoever can get to work on time irrespective of where they live, the ongoing regeneration and the economic growth needed in this area still trying to be achieved will once again not be achieved because Site 001 can not be considered sustainable as there is limited opportunity to access it other than by car. Employees will totally bypass the main town of Thorne, employees wages will not be spent in this community, the regeneration and economic growth failed to achieve once again.

The same sub standard unsafe route from Thorne North and Thorne South railway station would also have to accommodate people with disabilities getting to Site, the Disability Discrimination Act requires that their is fair treatment for those with disabilities, this is most definitely not the case.
No bus service to Site 001 is in place.
The agent states an alternative route which is along the Northern Boundary, along North Common Road, just to clarify there is no pedestrian / cycle path along this route neither is there space either side to construct one, the road is narrow, national speed limit applies (60mph) this is a busy vehicle heavy trafficked road, a through road from the M18 to Moorends and further. This road is unlit with deep ditches either side which has seen numerous accidents from vehicles crashing into them. This route is again unsafe for both able bodied and disabled employees of the development.

Site 160 is in a significantly more accessible location that is easily accessible from the main urban area and main town and can be reached by train, Thorne South and Thorne North stations, already continuous footpaths and cycle routes in place to the site for all users with out having to cross uncontrolled busy slip roads of a motorway or unmanned level crossings, a high frequency hourly bus service is already established that travels past the site, Site 160 is already easily accessible for the able bodied and also people with disabilities.

National Planning Policy Framework With regard to developments states:
Safe and suitable access can be achieved by all users.
Give priority first to pedestrians and cycle movements.
Address the needs of people with disabilities and reduced mobility in relation to all modes of transport.

Site 001 fails the above NPPF policies.

How can the council justify the proposal of Site 001 for employment use when the facts state it is not easily accessible for employees to travel to and from the site, it would be putting the lives in danger of employees using these routes, it is evidently clear Site 160 is significantly more accessible with safe footpaths / cycle paths, bus routes already in place, so therefore Site 160 is sustainable, once again justification is needed as to why the council has proposed site 001 a much inferior site over Site 160? Justification from the council required proving site 001 is the more sustainable site and chosen for employment allocation?
Pedestrian / cycle paths / crossings are the responsibility of the local authority, Doncaster Council should assess all future schemes, proposals on crossings for sustainable travel for this development, where is this assessment by a Doncaster council.

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 community and other interested parties about the nature and scale of the development.

Appendix 2 states very little detail of the nature and scale of proposed development Site 001, it gives no detail of the design of the buildings, materials, warehouses and distribution units placed or the height they will be. A master plan hasn’t been published in order that the local community can view the intentions the council has for this area of the Borough. For the scale of this development and the people it will affect on a day to day basis plus interested parties the information they have provided is shoddy, no clarity has been provided.

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

Policy 47

All non-residential and commercial developments, including extensions and alterations to existing properties, must be designed to be high quality, attractive, and make a positive contribution to the area in which they are located by meeting the following requirements:
A)
Proposals will be supported where they are designed to:
1. be sympathetic to local character and/or the host property in terms of their layout, sitting, height, massing, form, scale, detailing, materials, landscaping or, where appropriate, their heritage significance;

Development of this size and scale will not be sympathetic to the local character in any of the terms above. It would most certainly be out of character and destroy the unspoiled landscape that it is now.

2. have no unacceptable negative effects upon the amenity of neighbouring land uses or the environment;

A very negative affect would exist if this land is developed, it could potentially cause a risk of flooding to neighbouring properties and further, a depressing outlook, enduring noise, pollution, night light disturbance, increase in rubbish, all on a daily basis, harmful to the mental health of neighbours to the site, a unattractive approach along the A614 for visitors travelling in this area to Thorne to what is classed as a Historic Market Town, the wildlife would cease to exist, totally destroyed, hunting grounds destroyed if this land was covered in hard standing.

3. promote accessibility and way-finding for all travel modes through the layout of the movement network, landscape strategy and building design;

Reiterate all travel modes can not be achieved no safe route identified for pedestrians / cyclists / disabled.

4. meet functional requirements, whilst being architecturally appropriate, with interesting and visually attractive elevations which convey a sense of permanence;

The site of warehouses and distribution centres on this land will not have visually attractive elevations nor convey a sense of performance. It will convey architectural ugly buildings these types of buildings are not visually attractive in any form.

5. reduce the scale of bulky buildings and bland elevations by breaking down building mass and using better quality human scale materials and detailing for prominent and heavily used parts of the building;

The development will be extremely high huge bulky sheds, the elevations should be bland so they don’t look more prominent, seriously it doesn’t matter what materials are used they will look unsightly in this area.

6. locating parking, servicing and storage areas unobtrusively and reducing their visual impact through landscaping and boundary treatments;

On this scale of development many areas will still be obtrusive, landscaping will take time to establish, areas will not be screened for many years these areas will be seen by neighbouring properties.

For the above reasons sufficient detail / clarity has not been provided.

Development of Site 001 unsustainable.