For and on behalf of
Minerals Investments Ltd (Mr Ian Brealey) (03116)

DONCASTER LOCAL PLAN EXAMINATION
STAGE 4 HEARING SESSION REPRESENTATION
MATTER 8 ECONOMIC DEVELOPMENT

HELAA Site Ref: 184 - Brodsworth Quarry, Green Lane, Doncaster

Prepared by
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September 2020
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| Date:                  | September 2020 |

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Local Plan Hearing Statement – Stage 4 – Matter 8
September 2020
1.0 INTRODUCTION

1.1 This representation has been prepared by DLP Planning Ltd on behalf Minerals Investments Ltd (Mr Ian Brealey) in response to the Stage 4 Examination Hearing Sessions of the Doncaster Local Plan.

1.2 This representation addresses Matter 8 in relation to the following sites:

- HELAA Site Ref: 184 - Brodsworth Quarry, Green Lane, Doncaster

1.3 This document should be read alongside previous representations on the publication version of the Plan, as submitted in September 2019.
2.0 RESPONSE TO INSPECTORS QUESTIONS

Matter 8 – Economic Development

Issue - Employment Policy Areas

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?

Is policy 5 relating to employment policy areas defined on the Policies Map justified and consistent with national policy?

2.1 The criteria set out in Policy 5, to be addressed in the case that other uses are proposed in Employment Policy Areas, are unduly restrictive and not in accordance with the NPPF. Paragraph 120 of the NPPF is supportive of alternative uses:

Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

a) they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and

b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area. (DLP author’s emphasis)

2.2 Policy 5 does not require the proposed alternative use to contribute to meeting an unmet need for development in the area. The second part of the policy requires the alternative use to meet a range of criteria that are overly restrictive within the context of NPPF paragraph 120 b.

2.3 The intentions of the Policy as explained in the supporting text are not reflected in the wording of the Policy and lack the clarity necessary to ensure that applicants are clear what evidence is required for compliance. The requirement in part F to demonstrate that the site is ‘no longer viable for employment use’ is unduly onerous and does not reflect the intention set out in paragraph 4.68 that a lack of market interest in the use of the site for employment should be demonstrated.

2.4 As set out elsewhere in this statement, the approach taken by the Council is to allocate employment land and housing land separately and the opportunities to co-locate housing and employment have been missed. This is an issue of soundness as Paragraph 72 of the NPPF highlights the potential for larger sites to deliver sustainable development.
Are the Council’s suggested changes to paragraphs 16.127 and 16.158 necessary to make the Plan sound?

2.5 No further comment.

**Issue - Employment Allocations with Planning Permission**

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?

2.6 No further comment.

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

2.7 Policy 4 should be amended to make clear whether or not the criteria A-C within the policy apply also to development proposals that may come forward during the Plan period on employment allocations that had planning permission in 2018 i.e. those listed in tables E1-8.

2.8 Policy 4 should be amended as opposed to providing an additional policy to ensure that all employment allocations are treated consistently.

**Issue - Employment Allocations without Planning Permission**

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)

2.9 There are no objections to these allocations however they will not necessarily be delivered in the Plan period as employment development will be depend on the locational requirements for both home grown and incoming employment expansion. It is important therefore that there is a wide choice of employment sites including those which would allow for people to reside close to their place of work.

**Issue - Overall Employment Land Supply**

Q8.5. Collectively, will the employment allocations and employment policy areas be sufficient to meet anticipated development needs over the Plan period and provide
**Minerals Investments Ltd (Mr Ian Brealey)**

**Local Plan Hearing Statement – Stage 4 – Matter 8**

**September 2020**

enough flexibility to accommodate needs not anticipated?

2.10 As set out by other representors in their response to Matter 2, there is compelling evidence that the plan will not provide for a 15 year housing land supply. This is based on evidence presented on previous take up of employment land, future aspirations for growth and loss of employment land due to changes to the Use Classes Order and Permitted Development Rights.

2.11 For the reasons set out in paragraph 2.8 of DLP’s response on Matter 4, site 184 (Brodsworth Quarry) has a number of characteristics that supports its reuse as a mixed use housing and employment site, including that it is at low risk of flooding (Flood Zone 1). It is brownfield land in close proximity to existing settlements and the motorway network and differs in character to the surrounding Green Belt. Also, the nearby residential development, the A1 (M) and the former colliery to the north create a strong boundary for the site, and it is not considered that development of the site would be visually intrusive in the landscape. The site offers a flexibility of uses and has been demonstrated through the *Sustainability Appraisal* (CSD7.1) to perform better than other sites selected for allocation. If our assessment is incorrect then at the very least the site should be identified as a Reserve Site, to come forward in the event that other employment sites fail to deliver development.

2.12 It is noted that Policy 4 specifically seeks to secure specified employment related uses on employment land including “only business (B1 b/c), general industry (B2) and storage and distribution (B8) uses”.

2.13 Notwithstanding the changes required to bring this Policy in line with the recent changes to the Use Classes Order, this range of proposed uses is considered to be too restrictive and there is insufficient flexibility within the policy to accommodate other uses, particularly as Paragraph 2.18 of the draft Plan states that “overall, Doncaster’s economy remains relatively more sensitive to the impact of economic downturns” which could lead to a need to further diversify the employment offerings in the Borough.

2.14 The Council’s *Employment Land Needs Assessment* (ELNA) (March 2020) (SDEB8) further highlights the need for diversity in the employment offerings in the Borough.

>“Whilst it is accepted that warehousing/logistics has helped boost the economy over the last few years, there is now a recognition at the regional and local level that there is a need to diversify the economic offer in the borough such as ensuring that high value jobs
are created in areas such as engineering, digital and creative, and advanced materials. This will require other employment uses being provided in the borough so the right sites need to be delivered at the right time as stated in national guidance.”

2.15 Policy 4 should be amended to support a greater range of employment generating uses.

**Issue - Offices**

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?

2.16 No further comment.

**Issue - Requirements and Standards relating to Economic Development**

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

2.17 No further comment.

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

2.18 No further comment.

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?

2.19 No further comment.

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?

2.20 No. These requirements are overly complicated and should be simplified to require compliance with the relevant industry standards unless justification can be provided to support a departure.

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?
2.21 No further comment.

**Issue - Rural Economic Development**

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?

2.22 No further comment.

**Inspector’s Note No. 6 – Additional Question for Matter 8**

Q8.1.A. Do policies 4 or 5, or associated reasoned justification, need to be modified to reflect the changes to the Use Classes Order that will come into effect on 1 September 2020?

2.23 Yes. Reference to Use Class E should be included in Policies 4 and 5 where appropriate because Use Classes B1a, B1b and B1c now all fall under Use Class E. The Local Planning Authority will also need to consider what the implications of referencing Class E will be for the strategic aims of the employment policies (Policies 4 and 5) because several other uses now also fall under Class E such as (but not limited to) shops, cafes and restaurants, creches and gymnasiums.