DONCASTER LOCAL PLAN EXAMINATION

Matter 8 – Economic Development

In respect of
Inland Port (iPort), Rossington

on behalf of
Troy Verdion
Representor ID: 05177
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1 INTRODUCTION

1.1 This statement seeks to address the Inspector’s questions on Matter 8 Economic Development that relate to the representations made previously by RPS on behalf of Troy Verdion to the Regulation 19 Pre-submission Local Plan, in relation to the Inland Port site in Rossington, known as iPort.

1.2 The Inland Port site benefits from outline planning permission (LPA ref: 09/00190/OUTA) for a rail freight terminal served by rail and road, 562,000m² of warehouses and over 100 hectares of ecological enhancements. Verdion commenced construction in 2015 and to date eight major buildings have been built together with the rail terminal that has been operational since September 2018. The site access roads, drainage infrastructure and building plateaux for the remaining proposed buildings have all been constructed.

1.3 iPort is a Strategic Rail Freight Interchange (SRFI) connected to the rail network via the line of the former South Yorkshire Joint Railway. At footnote 42, the National Policy Statement For National Networks (NPSNN) defines an SRFI as: “a large multi-purpose rail freight interchange and distribution centre linked into both the rail and trunk road system. It has rail-served warehousing and container handling facilities and may also include manufacturing and processing activities”.

1.4 The implementation of the SRFI at iPort enables the diversion of freight from road to rail and plays a vital role in achieving the Government's commitment to sustainable development. The transfer of freight from road to rail has a vital role to play in a low carbon economy and helps to address climate change thus contributing to the Government’s economic, strategic and environmental objectives.

1.5 This statement specifically responds to the following matters and issues raised by the Inspector set out in the Schedule of Matters, Issues and Question for the Examination (Inspector’s Note 4, 11th June 2020). These are:

**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?**

**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?**

**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?**

**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?**

1.6 Our response to the above issue and questions will be set out in the following section.
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 The proposed modification to paragraph 16.127 is not necessary and the Council should retain the following bullet-point from paragraph 16.127 of the draft Local Plan, “iPort one of the UK’s largest logistics developments including a rail freight intermodal container facility. This is of regional importance and provides services to all UK ports and the Channel Tunnel”. This should be inserted at the end of Para 16.126. In addition, the planning permission status in Table E4 for iPort should be corrected to read Full/Outline.

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?

2.2 The Inspector’s question queries whether the Plan provides a clear indication on how to determine any future planning applications for the development on employment allocations with planning permission.

2.3 In relation to our client's site, iPort, Rossington, benefits from outline planning permission (LPA ref: 09/00190/OUTA) for a rail freight terminal served by rail and road and 562,000m² of B8 and ancillary floorspace. iPort is a major multi-modal transport hub and includes warehousing and ancillary floorspace. The implementation of the SRFI at iPort, Rossington, has strengthened Doncaster’s role as a logistics centre of national significance and plays a key role in promoting the sustainable distribution of goods. Doncaster is keen to support its role as a logistic hub and the Council recognise this at paragraph 7.18 of the draft Local Plan

2.4 Verdion commenced construction in 2015 and to date eight major buildings have been built together with the rail terminal that has been operational since September 2018. As set out in our Hearing Statement for Matter 2, there is 52 ha of serviced land remaining at iPort to accommodate additional units for logistics and warehousing and alternative B uses.

2.5 Giving priority to the location of strategic warehousing at iPort, would continue the approach in the current adopted Doncaster Core Strategy 2011-2028, where policy CS5 states, “in releasing new land for strategic warehousing, priority will be given to the proposed Strategic Rail Freight Interchange at Rossington which will be served by rail freight and will operate as an intermodal terminal”.

2.6 The broad spatial distribution of employment development proposed within policies 2 and 3 of the plan are not fully justified as they do not take into account the land currently available at iPort. The Council should ensure development is directed towards existing logistic and warehouse centres such as iPort, instead of allocating additional sites for employment.

2.7 National guidance states that planning policies should create the conditions in which businesses can invest, expand and adapt and plans should recognise and address the specific locational requirements off different sectors. It is important to point out that the iPort masterplan has changed several times to take account of the needs of the logistic development sector.

2.8 It should also be noted that the outline permission for iPort predates current national policy on the role and purpose of SRFI. It only permits ancillary B1/B2, whereas as noted above, the NPSNN states that SRFI may also include manufacturing and processing activities, not just warehousing and container handling facilities. In 2019, Verdion did obtain planning permission to change the use of one of the small units from B8 use to B2 to take account of the demand for new industrial space, but this was only permitted by the Council on the basis that it was considered a limited breach of policy.
2.9 We consider that the current draft Local Plan does not provide a clear framework to guide the Council in decision making and is not “effective” as per paragraph 182 of the NPPF. Given iPort is a strategic site with a significant role within the Borough, we consider there needs to be a site-specific policy in order to allow a degree of flexibility in completing the site in order to take account of both the needs of the logistics sector and the demands for industrial space in accordance with the NPSNN. A site-specific policy will ensure it is fully completed and delivered to its full potential.

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?

2.10 National guidance makes clear that plans should contribute to the achievement of sustainable development and that sufficient land should be available to support growth, innovation and improved productivity.

2.11 The employment allocations within the draft Local Plan without planning permission, particularly Carcroft Common, are located in locations that would be primarily appropriate for warehousing and logistic uses (Class B8). Furthermore, a number of sites within the borough have been granted planning permission outside the town centre and are likely to be marketed for B8 uses.

2.12 The land allocated for employment uses in the current draft of the Local Plan may be unviable for Doncaster’s long-term economic growth and will not contribute to planning’s national economic role in creating a competitive economy. This is because if supply is too far above demand, individual sites may not have a reasonable prospect of being taken up, therefore it is important to avoid excessive oversupply.

2.13 The Council’s Employment Land Availability studies show that there is already a significant amount of land potentially available for purely road-based distribution facilities. Additional land releases for such facilities in the short to medium term are unnecessary and would harm the completion of the Inland Port project, which has 52 hectares of employment land available.

2.14 We consider that the employment allocations without planning permission are unlikely to be fully developed given the scale and quantity of designated employment land proposed within the plan along with land available at existing sites such as iPort.

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?

2.15 Policy 3 refers to the need to deliver at least 481 hectares of employment land over the plan period, but no part of the policy (or any other policy within the plan) sets out the ‘type’ of employment land that is required, such as warehousing, industrial or general office space. This does not accord with Para 8 a) of the NPPF, which states that an economic objective of the planning system is to ensure that sufficient land of the right type is available in the right places.

2.16 Verdion has raised significant concerns relating to the overall need for development proposed in policy 3 and these are raised within our Hearing Statement for Matter 2. We are concerned with the Spatial Strategy and the consistency between the proposed distribution within Policy 2 and 3 and the proposed allocations for employment.

2.17 There is minimal evidence that Doncaster’s aspirations for a diverse economy has guided the employment land allocations. At present the designated employment allocations follow a pattern of development that is based on the site requirements of the logistics and warehousing industry.
3 CONCLUSION

3.1 To conclude, Verdion supports the ambitions of Doncaster to become a "more important economic hub with a stronger, more balanced and productive economy", however this can only be achieved through a deliverable and sustainable plan that allocates employment land appropriately, delivers it in a phased manner and prioritises the SRFI at iPort.

3.2 Rail freight is of strategic importance and is an increasingly important driver of economic growth, therefore the Council should safeguard the delivery of the SRFI by avoiding an excessive, unsustainable development, through additional employment allocations within the plan. SRFIs can provide considerable benefits for the local economy as rail freight interchanges are not only locations for freight access to the railway but also locations for businesses, capable now or in the future, of supporting their commercial activities by rail, and by accommodating manufacturing and processing activities, not just warehousing and container handling facilities.

3.3 The National Policy Statement for National Networks makes clear that SRFIs should be developed in a form that can accommodate both rail and non-rail activities, and manufacturing and processing activities, not just warehousing and container handling facilities.

3.4 We consider that the Local Plan can be made sound through:

- providing a mechanism for phasing the release of further land for strategic warehousing to give priority to rail-served sites, such as iPort, and

- through a site-specific policy for iPort, in line with National Policy.