Doncaster Local Plan Examination
Mr Don Parkinson, Mr Kim Parkinson and Wilton (Thorne) Ltd (ID 05293)
Matter 3 Statement – Strategic Approach

Issued September 2020

1.1 This Hearing Statement has been prepared on behalf of Mr Donald Parkinson, Mr Kim Parkinson and Wilton (Thorne) Ltd (ID 05293). The Statement responds to Questions Q3.2c, Q3.3 and Q3.4 only.

1.2 Donald and Kim Parkinson are the majority landowners of draft employment allocation 001: J6 M18, Thorne North and Wilton (Thorne) Ltd are their development partner. Wilton (Thorne) Ltd is part of Wilton Developments Ltd, who has a long established track record of delivering employment sites in the region.

1.3 The Thorne North site comprises 73.63ha of land and is located off Selby Road to the north west of Thorne, to the west of the M18 and to the north of M18 Junction 6.

1.4 The site also is the subject of a pending outline planning application (ref. 16/02136/OUTM) for the development of employment uses. A comprehensive suite of updated plans and documents was submitted to DMBC in April 2020. This information is currently undergoing assessment and the application remains before DMBC for consideration.

Matter 3: Strategic Approach

Q3.2c: Is the broad spatial distribution of development proposed in policies 2 and 3 justified? In particular, the aims to accommodate:

Major new employment sites in locations accessible from the Main Urban Area and Main Towns in locations attractive to the market with good access to the strategic transport network as well as Doncaster Sheffield Airport.

1.5 Our client is supportive of the broad spatial distribution of employment development proposed in policies 2 and 3 and this is a justified and indeed logical approach. This approach seeks to distribute major new employment sites across the Borough, with a focus on locations accessible from the Main Urban Area alongside defined ‘Main Towns’, such as Thorne and Moorends, that are attractive to the market and with good access to the strategic transport network.

1.6 As paragraphs 4.28 and 4.31 of the reasoned justification to policy 3 state, it is important that the Local Plan identifies employment allocations across not just the Main Urban Area, but also the Main Towns, in order to ensure that regeneration benefits are spread across the Borough. It is appropriate that Thorne and Moorends is identified as a Main Town, being one of the larger settlements outwith the urban area with a significant population, available workforce and a wide range of existing services. Paragraph 16.130 of the Local Plan confirms that Thorne and Moorends has a combined population of 17,295 and is one of only three settlements in the Borough to have a town centre (together with the Main Urban Area and Mexborough). The Settlement Strategy 2020 [SDEB3] specifically establishes that Thorne and Moorends:
Has one of only three town centres in the Borough, and this serves a wider catchment than just the town itself (paragraph 4.9.2);

• Is a highly sustainable location (paragraph 4.9.9);

• Is one of the largest and best performing settlements in the Borough. It has five primary schools, a secondary school, two doctors, four pharmacies and three dentists (paragraph 4.9.5);

• Is served by the A614 and the M18 with a junction (6) immediately next to the town (paragraph 4.9.3); and

• Is served by two railway stations (the best provision in Doncaster aside from the Main Urban Area) with services to Doncaster, Goole and Scunthorpe (paragraph 4.9.3).

On this basis, it is entirely appropriate that Thorne and Moorends is identified as a Main Town in the Local Plan settlement hierarchy.

General Approach

The approach undertaken by DMBC in determining the broad spatial distribution of employment development proposed in policies 2 and 3 is justified and has clearly been derived following an extensive evidence gathering and public consultation exercise which commenced in 2015.

Initial consultation on Issues and Options for the broad spatial distribution of employment land over the plan period took place in 2015 [AE01]. This stage also included a Sustainability Appraisal (July 2015) [AE06]. Three development strategies were initially considered:

• Option 1: Core Strategy approach

• Option 2: Doncaster and Main Town Focus

• Option 3: Greater Dispersal Strategy

Consideration was also given as to whether employment sites should be co-located with housing, or whether these could be better accommodated in locations less suitable for new homes, provided that they are well-placed with regards to transport links. Feedback from the consultation exercise indicated that major employment development did not need to be located close to major residential areas and that residents would be prepared to travel to work providing that good transport links were in place.

Subsequently, a new “hybrid option – urban concentration and dispersal” (Option 4) was introduced as the preferred option. This includes a combination of the earlier options with a focus on the Main Urban Area and with development also apportioned to Main Towns and Service Towns/Villages which provide good access to infrastructure and services, such as public transport links.

Sustainability Appraisal has been conducted at every stage of the Plan with the most recent version being that published in August 2019 [CSD7.1] along with an Addendum which was issued in March 2020 [CSD7]. The Sustainability Appraisal sets out how the various development options, vision and objectives of the Plan have been robustly considered. This

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1 Vision, Aims and Objectives and Issues and Options Summer Consultation 2015 Responses and Summaries (Feb 2016) [AE02]
Further evidence gathering, independent Sustainability Appraisal and consultation determined the final approach to the settlement hierarchy and spatial distribution of employment development in the Borough. This directs employment growth to the largest and most sustainable locations in the Borough, including Main Towns such as Thorne and Moorends, which have the largest population and best access to services, employment provision and excellent accessibility via wider transport networks. This is considered to be a robust process for formulating the overarching strategic approach to the distribution of employment allocations.

The Local Plan’s spatial approach to employment allocations is to locate such development in accessible locations that are easily accessible for residents via the strategic road network, rather than co-locating new employment development within existing housing locations. Employment sites will therefore be directed to locations attractive to the market, rather than necessarily directly adjacent to centres of population. This approach is supported.

The approach set out in policies 2 and 3 to focus logistics, light industry and manufacturing in locations that can accommodate large buildings with good access to the M18/M180 motorways and the strategic road network is also supported. These are the areas where commercial advice, including that set out within the accompanying report provided by leading commercial agents CPP, based in Sheffield and appended to our Hearing Statement for Matter 2, confirms where market demand lies. This is discussed further in our response to Q3.3 below.

Site 001: Junction 6 M18 Thorne North constitutes a large scale site which can accommodate buildings of significant footprints in close proximity and accessible to the local population of the Main Town of Thorne and Moorends and its associated population/workforce, whilst also comprising a well located site with excellent and direct access to the strategic transport network and in a location that is attractive to the market. The presence of Site 001 therefore demonstrates that the strategic approach set out within Policies 2 and 3 is justified and is capable of being delivered.

In summary, as set out above, a number of reasonable alternatives have been taken into account in determining the final broad spatial distribution of employment development set out in policies 2 and 3 and the most appropriate strategy has been selected. This is consistent with achieving sustainable development in accordance with the NPPF. It is based on a robust and proportionate evidence base, providing a sound basis for the strategic approach chosen. Employment development will be located in the places which robust evidence demonstrates are best placed to accommodate such growth. The approach to the broad spatial distribution of employment development proposed in Policies 2 and 3 is therefore justified and is supported.

**Q3.3: Is the broad spatial distribution of development proposed by the employment and housing allocations in policies 4 and 6 justified having regard to the aims set out in policies 2 and 3? Are any main modifications required to ensure that the Plan is unambiguous and internally consistent in this respect?**

In order to accord with the strategic employment aims of the Local Plan spatial strategy, it is appropriate for employment allocations to be identified in the Thorne and Moorends area for the reasons set out in our answer to question 3.2c above.
1.19 We consider that the broad spatial distribution of employment allocations including site 001: Junction 6, M18, Thorne North (as allocated by policy 4) is consistent with and will deliver the Local Plan’s strategic employment objectives and the aims set out in policies 2 and 3 in full and is therefore justified and supported.

1.20 The allocation of site 001: Junction 6, M18, Thorne North accords with the spatial strategy set by Local Plan strategic policies 2 and 3 in proposing major employment development suitable for logistics, manufacturing and light industrial uses adjoining the Main Town of Thorne and Moorends and its resident population/workforce, in an area which is attractive to the market, can accommodate large buildings, and has direct access to and visibility from the M18 at Junction 6. No other available site provides such locational benefits.

1.21 The allocation, therefore, directly contributes to the delivery of the strategic requirements established by Local Plan Policies 2 and 3, and in particular the sustainability and regeneration benefits of locating strategic employment land accessible to the available workforce within the north of the Borough.

1.22 Advice provided by leading commercial agents CPP, based in Sheffield, appended to our Hearing Statement for Matter 2, confirms that there is demand for the type and scale of employment development proposed in this location, and that site 001 Junction 6 M18 Thorne North provides a number of significant and site-specific advantages. Specifically:

i  The level nature, size and regular shape of the site provides flexibility to cater for a wide range of occupier requirements;

ii  Its direct access from junction 6 of the M18 which is not heavily used and therefore comparatively congestion free which would enable occupiers to have fast and unfettered access to the Motorway.

iii  Proximity to a critical mass of existing large occupiers along the M18 and A1(M) corridors.

iv  The site is also located close to an attractive labour offering and has access to a good supply of skilled labour.

v  Visibility, and associated signage opportunities, from the M18, that will help to ensure the timely delivery of Site 001 and the associated investment, job creation and regeneration.

1.23 Overall the commercial report clearly demonstrates that the site will be attractive to the market and comprises a well accessed and sought-after location capable of delivering major employment development without delay.

1.24 Additionally, the Indicative Masterplan in our outline planning application shows that the site can accommodate a range of unit sizes. In addition to the “big box” units in demand from distributors, there are also “mid box” units that appeal to both distributors and local manufacturers. There are also “small box” units aimed at local SME and start-up businesses, most of which will be local to Thorne and Moorends.

1.25 The allocation is also well located relative to the strategic road network in the “triangle” of the M18/M62/A1, all of which give tachograph single trip access to approximately 80% of the UK population.
The location of the allocation adjacent to Junction 6 of the M18 will also help to segregate commercial traffic accessing the site from the everyday vehicular trips that most residents of Thorne and Moorends will make.

Whilst detailed site specific matters relating to the suitability and deliverability of Site 001 are addressed in our response to Matter 8, it is nevertheless clear that DMBC has applied a robust and detailed approach in selecting site 001 as a draft employment allocation to meet the strategic employment aims of policies 2 and 3. This included extensive evidence gathering, public consultation and Sustainability Appraisal as summarised below.

The **Doncaster Housing and Economic Land Availability Assessment** (2018, published July 2019) [SDEB45] independently assessed the potential of site 001 (and other options) to meet DMBC’s identified employment requirement. Site 001 was robustly considered as part of this process and it passed the preliminary tests and was found to be suitable, available and deliverable to accommodate strategic employment development over the plan period.

The **Employment Land Review** (June 2019 addendum²) [SDEB10.1] independently assessed site 001 (along with other sites) and concluded:

- The site represents a good distribution based development opportunity;
- The site is well located relative to the strategic road network;
- The site is able to draw on the employment catchment of Thorne and Moorends;
- Thorne North train station is nearby as are restaurants, hotels and supermarkets;
- Thorne is an established distribution location;
- The site would represent a new large-scale distribution location, closer to the Humber Ports than most of the other sites under consideration, and with good proximity to the West Yorkshire conurbation;
- The site is in a single ownership and the landowner wishes to sell and has had expressions of interest³;
- There is a planning application for B2/B8 development pending;
- The landowner expects the site to be available for development in 0-5 years; and
- There are no known specific constraints other than drainage (site is in Flood Zone 3).

Site 001 was subject to independent **Sustainability Appraisal** (2019 and addendum 2020) [CSD7 and 7.1] (along with others) to identify any significant positive or negative effects as well as appropriate mitigation that would need to be addressed if it was subsequently put forward for allocation. Following this independent assessment, the site progressed for further consideration.

DMBC undertook a robust flood risk sequential assessment of potential employment sites as part of the site selection process. This robust assessment process is set out in the Housing and Employment Site Selection Methodology and Results Report [SDEB46] and this demonstrates that the sequential test is passed and site 001 should be allocated for employment use in the Doncaster Local Plan.

² The original document was published in February 2018 and is subject to a 2019 amendment following public consultation that resulted in some amended conclusions in respect of site 001 Thorne North following the provision of further information.

³ All 3 landowners have subsequently appointed Wilton (Thorne) Ltd
1.32 As the draft employment allocation proposes ‘less vulnerable’ uses, there is no requirement to demonstrate accordance with the Exception Test in relation to the site.

1.33 **Whole plan viability testing** (2016 and 2019) [SDEB48.1 and 49] has been undertaken and no viability issues have been identified in relation to the delivery of strategic warehouse schemes or site 001.

1.34 DMBC’s Highway Team has undertaken a **Technical Assessment of Highway and Access Issues** and has not identified the site as having any unsurmountable technical issues associated with creating a safe and satisfactory access into the site.

### Overall Conclusions

1.35 In conclusion, it is considered that the allocation of site 001 in Thorne, plays an integral role in delivering the spatial distribution of employment allocations required by policies 2 and 3.

1.36 Following the above robust process and taking into account feedback received from the 2018 Local Plan consultation, site 001 has been selected as an employment allocation.

1.37 On this basis, site 001 is an appropriate location to meet the strategic employment objectives set out in the Local Plan including to:

- provide at least 481 ha of employment land within the Borough over the plan period\(^5\);
- accommodate growth in the logistics, light industry and manufacturing sectors in locations that can accommodate large buildings with good access to the M18/M180 motorways and strategic road network (policy 2), with large scale employment sites focused along the M18\(^6\);
- distribute growth to the Main Towns, including Thorne and Moorends in the north, to ensure that regeneration benefits are spread across the Borough\(^7\); and
- Provide employment opportunities close to a local workforce\(^8\).

1.38 The location of employment allocation 001: Junction 6, M18, Thorne North (as proposed by policy 4) is consistent with and will deliver the Local Plan’s strategic employment objectives and the aims set out in policies 2 and 3 in full. This allocation has been derived from extensive consultation with stakeholders and residents and is located where robust evidence demonstrates the aims of policies 2 and 3 can best be met.

1.39 DMBC has also taken a number of other alternative site options into account as part of the robust assessment process described above in reaching a decision on its proposed employment allocations, none of which were concluded to better meet the strategic aims set out in policies 2 and 3 than site 001: Junction 6, M18, Thorne North.

1.40 The approach adopted by DMBC to the selection of site 001 as an employment allocation is justified, effective, positively prepared and consistent with national policy, and is therefore sound.

1.41 The location of employment allocation 001: Junction 6, M18, Thorne North (as proposed by policy 4) is an appropriate strategy to achieve the broad spatial distribution of employment

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\(^4\) Set out in the Housing and Employment Site Selection Methodology and Results Report [SDEB46]

\(^5\) Policy 3

\(^6\) paragraph 4.29 of the reasoned justification to policy 3

\(^7\) paragraphs 4.28 and 4.31 of the reasoned justification to policy 3

\(^8\) paragraph 4.27 of the reasoned justification to policy 3
development proposed in Policies 2 and 3, it is consistent with achieving sustainable development in accordance with the NPPF and is based on a robust and proportionate evidence base. The allocation will deliver the Local Plan’s strategic employment objectives and the aims set out in policies 2 and 3 in full and is therefore justified and supported.

1.42 On this basis, no main modifications are required to ensure that the Plan is unambiguous and internally consistent in respect of allocation 001 Junction 6 M18 Thorne North.

**Question 3.4: Is the suggested change to policy 2 set out in the Council’s response to PQ14 necessary to make the Plan sound?**

1.43 PQ14 [DON INSP2] asked:
- Which parts of policy 2 make clear how a decision maker should react to a development proposal?
- What is the purpose of other parts of policy 2?

1.44 DMBC’s response [DMBC7] confirmed that policy 2 is intended to encapsulate the Plan’s overall Spatial Strategy and Settlement Hierarchy. It is not wholly a development management policy but is part provided to explain the context for the Plan’s overall approach to how growth is to be provided for in the Borough. It gives the strategic context for how decisions have been made on where to locate development through site allocations. However, where considered key to implementation of the spatial strategy, and necessary to guide determination of individual development proposals, development management policy is also given.

1.45 DMBC has suggested that if the Inspector is of the opinion that the clarity of Policy 2 should be improved to highlight the specific parts that a decision maker should use to react to a development proposal, the following Main Modifications should be made:
- Most of the initial section of policy 2 relating to the ‘overall strategy’ should be removed from policy 2 and placed in the preceding policy text (following paragraph 4.5).
- Policy 2 should then be retitled ‘Settlement Hierarchy (Strategic Policy)’ and just set out largely unaltered text relating to the settlement hierarchy.

1.46 The representations previously prepared by Lichfields on behalf of Mr Donald Parkinson, Mr Kim Parkinson and Wilton (Thorne) Ltd provided support for the approach to the spatial strategy set out in Policy 2 and concluded that policy 2 was justified, effective (deliverable), positively prepared and sound in its current form. On this basis, the suggested change to policy 2 set out in the Council’s response to PQ14 is not necessary in order to make the Plan sound.