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Matter 3 – Strategic Approach

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

c) 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.

1.1 We fundamentally disagree with the different approaches adopted for the strategic aims for housing and employment in the Plan. The different strategies result in an unsound plan that conflicts with the vision and aims of the spatial strategy.

1.2 As set out in our representation statement we generally support the strategic vision for major new employment sites and growth in accessible locations on the motorway corridors as well as Doncaster Sheffield Airport.

1.3 However, the focus of distributing major new employment sites in the east of the Borough fails to recognise the existing functions and deprivation of communities in the west as referred to in the Employment Land Needs Assessment (ELNA 2020) (SDEB8).

1.4 Paragraph 4.60 onwards of our representation, discusses sections of the plan which refer to the importance of communities, accessibility to local employment opportunities and current live/ work patterns.

1.5 The proposed housing distribution seeks to deliver sustainable growth across the borough on a proportional basis amongst the settlements. This distribution results in new housing allocations in the main towns and service towns and villages in the west of the Borough. However this housing growth is not complemented by any employment allocations (with the exception of a small site 743 in Edlington).

1.6 The disparity in the housing and employment allocations fail to deliver a strategy to serve the existing population and live work patterns as shown in the evidence base. The allocations also fail to deliver flexibility and a choice of sites for employers in the Borough. In particular the distribution of employment allocations will not support the growth or expansion of existing employment operations based in employment policy areas.
ID Planning on behalf of Polypipe Building Products
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1.7 The lack of growth opportunities for existing businesses in the west of the Borough fails to deliver the aim of policy 2 to deliver sustainable growth and maintain sustainable and cohesive communities.

1.8 As referred to in paragraph 4.35 -4.38 and part 5 of our representation statement, the plan should allocate an employment site at Edlington to enable future flexibility and choice for existing business in the area.

(344 words)

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?

1.9 As referred in paragraphs 4.18 onward of the statement submitted with our representations, we consider the separate strategy approaches to housing and employment growth in the borough is flawed and will lead to unsustainable development and increased travel.

1.10 The failure of the Plan to take into account the evidence of existing live/ work patterns will lead to unsustainable communities and will not help to address identified deprivation in the west.

1.11 Policy 2 seeks to deliver sustainable growth and to create and maintain strong, sustainable, cohesive and inclusive communities. The proposed employment allocations focus heavily on the delivery of modern/ new businesses and investment and do not complement existing live work patterns or provide growth opportunities for existing businesses.

1.12 Proposed housing growth in the west of the borough is not supported by any opportunities for employment growth in these areas, despite a number of existing businesses operating from employment policies areas, including Polypipe at Edlington, one of the boroughs largest employers.

1.13 As referred to in our Statement (para 4.30), the failure of the employment and housing strategies to overlap leads to ineffective policies to deliver the vision of the plan for sustainable growth.
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1.14 The proposed employment allocations will fail to deliver the aims of policy in 2 for the following reasons;

- The proposed employment allocations will not help to maintain strong, sustainable and cohesive and inclusive communities as existing and proposed residents will not be able to access jobs locally
- The proposed employment allocations will not maintain strong communities as there are currently no opportunities for existing businesses in the west to grow and expand (other than within existing policy areas)
- The proposed allocations do not provide a mix or choice of sites which is likely to impede delivery of existing businesses to grow.

1.15 Paragraph 2.6.8 of the Green Belt Topic Paper acknowledges that employment delivery is limited to the east of the Borough. The Plan seeks to redress this through the reallocation of Carcroft Common (site 441) located in the north of the Borough.

1.16 This site was allocated for employment use in the 1998 UDP and has not come forward for development and delivery of the site remains constrained and unlikely to come forward until the end of the plan period. The Doncaster Employment Land Review (Feb 2018) (SDEB10) states that the site relies on the A1(M)-A19 link road being built which isn’t yet programmed/ funded. The site is mainly in Flood Zone 3 and is affected by powerlines.

1.17 It is not considered that the inclusion of a single constrained site is sufficient to address the skewed distribution of employment land or provide a suitable mix or choice of sites to meet the aims of policy 2.

1.18 A main modification is required to provide additional employment allocations in the west of the Borough. As referred to in paragraph 4.70 and section 5 of our representation statement it is considered that additional new employment allocations are required at Broomhouse Lane on land adjoining the existing employment policy area in the west of Borough. This will ensure that sustainable new communities are created in the west of the borough through the delivery and growth of new homes and opportunities for existing businesses to expand and remain in the area.

(547 words)
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Matter 4 – Green Belt

Q4.10 Assuming that I conclude that the Plan identifies sufficient land to ensure that justified development needs can be met in suitable locations throughout the plan period, would there be exceptional circumstances to justify taking additional land out of the Green Belt at the present time, for example to try to ensure that Green Belt boundaries will not need to be altered again at the end of the plan period?

1.19 As set out in paragraphs 4.19 to 4.38 of our representations we consider that a further review of the Green Belt is required to address the need for employment allocations in the west of the Borough particularly Edlington.

1.20 The Green Belt Topic Paper 3 DMBC3 refers to the different strategy’s for identifying employment and housing sites. We have raised our concerns with this approach in response to matter 3 and in our representation document. DMBC3 states that due to the locational approach to employment sites there are no exceptional circumstances for releasing Green Belt land for employment purposes. We disagree with this statement, as referred to in matter 3 we do not consider this approach will be effective in delivering the aims of the plan for sustainable growth.

1.21 Having regard to paragraph 2.2.7 of the Green Belt Topic Paper, we consider that exceptional circumstances exist for employment allocations at Edlington.

1.22 As referred to in Paragraphs Part 5 of our Representation statement we consider there is an opportunity for land adjoining the Broomhouse Lane Employment Policy Area to be removed from the Green Belt and allocated for employment.

1.23 The proposed amendment would provide an opportunity for growth of an existing employment area, the majority of which is occupied by our client Polypipe, a major employer in the Borough. The provision of an employment allocation would provide the opportunity for employment growth to support the large housing allocations with permission (sites 646 and 638).

1.24 Paragraph 134 of the NPPF confirms the Green Belt purposes. The site adjoins the settlement boundary on two sides and is therefore not in an isolated location but on the edge of the existing development limit and the proposed allocation would bring the settlement boundary in line with the southern extent of the boundary to the west.

1.25 Strong defensible boundaries are provided by the existing Edlington woodland to the south and east so that the proposal would not result in the unrestricted sprawl of large built up areas.
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1.26 Edlington wood to the east and south of the site and the existing development limits forming the northern and western boundary ensure that the proposed allocation will not result in neighbouring towns merging into one another.

1.27 The proposed allocation will not encroach into the open countryside as the site is currently open space and is bounded by woodland and the existing development limits.

1.28 The proposed allocation will not harm the setting or character of historic towns.

1.29 Finally the proposed allocation assist in urban regeneration by providing an opportunity for sustainable growth and regeneration of an existing service town in the west of the Borough.

1.30 Further information on the site is provided in our Representation document.

(457 words)
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Matter 8 – Economic Development

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 need not anticipated.

1.31 No, as referred to in our response to Matter 3 Q3.3 we do not consider the proposed employment allocations provide sufficient flexibility or choice to meet anticipated development needs over the plan period.

1.32 The proposed allocations are skewed to the east of the Borough due to the locational strategy adopted (which we consider is flawed as referred to in our response to matter 3). However, it is clear that the locational strategy and subsequent allocations focus on the major new employment sites, catering for the growth strategy which focuses on higher skilled jobs (referred to in paragraph 4.55 of the plan). We generally support the allocation of the sites to support this strategy, although as referred to in paragraph 4.82 of our statement, we do not consider the proposed allocations are sufficient to meet the needs of, in particular, existing businesses.

1.33 The proposed allocations fail to provide opportunities for existing businesses to expand, particularly those in the west of the Borough. Paragraph 4.59 onwards of our statement highlights the disparity between the existing employment policy areas and lack of new allocations which restrict the options for growth of existing businesses.

1.34 The existing employment policy areas provide a large number of local job opportunities and play a key role in the sustainability of the communities and settlements in the west of the Borough.

1.35 Despite the evidence base which highlights current local live work patterns and the importance of existing business, the proposed allocations fail to provide for, or anticipate the development needs of these businesses over the plan period.

1.36 As referred to in our response to Matter 3 Q3.3 we do not consider that the provision of a single constrained site in the north of the Borough (site 441) is sufficient to redress the balance of allocations that, with the exception of site 441, is limited to the east of the Borough.
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1.37 We consider that additional employment allocations should be made in the west of borough to provide a more sustainable distribution of sites and to provide greater choice and flexibility particularly for existing businesses.

1.38 Section 5 of our representation provides details of two sites which adjoin the existing Broomhouse Lane policy area that we consider should be allocated for employment use to provide an opportunity for growth and expansion of existing businesses over the plan period.

(392 words)