Written Statement for Inspector on the Local Plan for Doncaster.

The Joint Rural Parishes (JRP) have contributed to all Consultation stages of the Local Plan for Doncaster and request that our contribution via these written statements be included for consideration by the Inspector at this stage of the consultation.

The JRP directly refers to the Visions and Objectives, as listed below, in the body of our Written Statements on Matters relating to the Local Plan.

Vision

DMBC has defined the Vision and ‘How the vision will be achieved’ in the Local Plan on page 15, 3.5 ...‘To help achieve this vision and inform the Local Plan’s policies, a series of objectives have been developed in parallel with the Sustainability Appraisal process’ and it goes on to list these objectives:

2. Supporting the conditions for attracting jobs and growth - ‘create and improve access to high quality employment and training opportunities for everyone in Doncaster’

8. Transport and Accessibility - ‘Improve the travel choice within the Borough and beyond to improve access to services and jobs, between communities and along key transport corridors, reducing the need to travel by car and ensuring new development is accessible to everyone’


20. Natural Resources – ‘Protect and enhance the quality of our water and soil resources (including high grade agricultural land).

Page 16, 3.8 ‘How will success against the vision and objectives be measured?’ it states ‘The success of the Local Plan will be monitored against indicators – see Chapter 15: Implementation and Monitoring for more detail’.

Matter 8. Economic Development

The JRP continue to promote, support and encourage DMBC in its efforts to deliver a commercially robust economic strategy which will deliver both genuine uplift and improvement in valuable and sustainable employment across the borough.
Previous iterations of the Local Plan have stated ambitious targets for growth and much need inward investment and development and all – including the current submission - have stressed the need for employment uses which are defined in paragraph 4.62 as B1a (offices, other than those with A2); B1b (research and development); B1c (light industry); B2 (general industry); and B8 (storage and distribution).

However, whilst several high-profile schemes have been delivered to date, particularly in regard to B8 categorisation, it is our view that the Council have not provided or demonstrated that sufficient opportunity exists to achieve the aspirational targets outlined in the Local Plan submitted.

The Council’s main evidence for the employment land need identified in the Plan includes the Economic Forecasts and Housing Needs Assessment (EFHNA Peter Brett Associates 2018, with amendments 2019) and Housing and Employment Land Availability Assessment (2018).

Interrogation of both these reports has identified the significant gap between external market-based data driven analysis of Doncaster’s economic potential and DMBC’s desired ambition to deliver a local plan which exceeds past and current performance targets.

The EFHNA study was commissioned by Doncaster Council to provide part of the evidence base to inform targets and requirements of the emerging Local Plan. It considered the needs and targets for employment land and housing for the plan period 2015-32, applying two alternative economic futures: ‘a business-as-usual scenario’, and ‘a policy-led scenario’ in which job growth fulfils and exceeds the ambitions of Sheffield City Region (SCR).

Both scenarios were based on specific localised economic forecasts provided by Experian.

The ‘business-as-usual’ scenario is Experian’s baseline forecast and represents an assessment of the most likely economic future for the borough.

The ‘policy-led’ scenario assumes ambitious potential for both employment and housing, including job growth of 1% p.a. based on emerging SCR targets.

The ‘policy led’ scenario is the basis on which DMBC has determined the economic potential and thus, the employment need and demand for employment land and housing, stated in the submitted Local Plan.

The forecasts stated in both scenarios predict the future number of jobs in Doncaster, from which an estimation of the demand for employment land that the plan will require has been assessed.

In addition to the above, DMBC has also justified the validity of the employment growth assumptions based on the fact that growth of 1%+ has been historically achieved prior to 2017/18. Beyond this date however, and potentially in reaction to post Brexit consolidation and market uncertainty, actual growth, together with demand and enquiries for employment land has fallen, even prior to the current COVID 19 crisis.
Clearly, the robustness of the number of future jobs is absolutely vital to support an assessment of the need for sustainable and deliverable employment land and DMBC must be challenged to demonstrate that this has indeed been achieved.

We do not believe this has been demonstrated.

Furthermore, whilst DMBC has made ambitious assumptions in line with stated SCR growth aspirations, the level of employment opportunity and employment land requirement is significantly greater than that of any of its SCR counterparts. The basis on which DMBC has assessed these targets is not demonstrated and no evidence exists to support such exceptional performance levels. Issues we raised in Matters 5.

The proposed plan makes much of the connectivity of the region and in particular, the transport infrastructure and network connecting Doncaster not only to its regional neighbours, but also national and international hubs. However, DMBC’s counterparts are also exploiting this potential in their drive to attract and maintain key employers and inward investment. This is particularly evident in both the stated ambitions of both BMBC and SCC who have secured significant investment in, and development of, available and potential employment and residential sites adjacent to key arterial routes and strategic development corridors.

The race to secure inward investment, development and employers to Doncaster and the competition it faces from both SCR counterparts and beyond, also applies to DMBC’s ability to attract, develop and retain a workforce skilled and appropriate for each of the sectors identified within the plan.

As well as rebalancing the commercial sectors allocated to identified employment land, it is also essential to rebalance the demographics and skills sets of both current and future workforce. This is particularly crucial in order to meet and exceed employer demand for increased output and productivity – a key area of underperformance across the Borough.

Within the plan DMBC has made strong statements regarding its intention to secure such a workforce to support employment land sites allocated to the market sectors identified as critical to the growth of the Borough and its commercially sustainable future.

However, it is not clear how this ambition will be realised, nor is it clear how Doncaster will attract, develop and retain such a workforce when compared once again to its SCR counterparts.

Indeed, the much-publicised launch of the National College for High Speed Rail – recently rebranded as the National College for Advanced Transport and Infrastructure (NCATI) – has failed to enrol the level of apprenticeships expected and indeed needed to ensure its commercial viability and after just three years, it has required an £5m government cash injection to maintain operations.

Furthermore, a damning Ofsted report rating the college as INADEQUATE was published in February 2020 and reported that at the time of inspection; just 167 apprentices were enrolled against a target of 1200 per year by 2022.
Jobs growth and the subsequent employment land requirement and housing need targets identified within the plan must be grounded by validated data, robust evidence and a balanced and realistic view of the challenges that must be addressed beyond economic performance indicators. We contend it does not.

The latest iteration of the plan, together with amendments submitted by DMBC during the examination stage, has led to a number of inconsistencies in sites identified as Employment Policy Areas and Employment Land Allocations with/without planning permission.

As a result, clarity is required to establish a definitive assessment and categorisation of the identified areas and land allocations.

This is particularly important to ensure all potential sites contributing to the aspirational target of 481 hectares are included, without duplication and without the risk of including surplus land being brought forward and developed earlier than anticipated within the plan period.

As the plan does not currently state the total area of land designated as Employment Policy areas, it is essential that DMBC provides an accurate assessment of operational/occupied land versus vacant/available sites within each of the policy areas.

It is also crucial that an assessment of occupancy and lease terms of current employers within each of the Employment policy areas is undertaken.

This is crucial for two reasons: firstly, to determine the sustainability of jobs and employment opportunities which will impact directly on the ability to achieve DMBC’s aspirational jobs target; and secondly, to assess employment sites likely to become vacant during the plan period and therefore able to contribute to the aspirational employment land target, reducing the need for further employment land development and minimising the risk of oversupply.

With particular reference to Employment Policy Areas, Policy 5\(^1\) states: ‘*that employment policy areas, as defined on the Policies Map, will continue to be supported primarily for employment uses*’. Further, the policy states ‘*that other uses will be supported, provided that a number of criteria are met*’.

This is of particular concern to the JRP. Any such criteria to support change of use applications must be an integral part of the public planning application process and subject to the same stringent public engagement requirements.

The plan does not provide sufficient detail to provide clarity with regard to the issue of change of use within Employment Policy Areas.

This concern is also strongly expressed with regard to the planning process and community engagement strategies in relation to the identified Employment Allocations without Planning Permission.

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\(^1\) Local Plan: Policy 5: Employment Policy Areas (Strategic Policy)
If these sites are included in the overall employment land targets then DMBC has made the assumption that planning permission will be granted without regard to national planning policy and public engagement.

If these sites have not been included within the overall target for employment land then these sites are surplus to the stated employment land required to deliver the plan and should be removed.

**Education/Apprenticeships.**

The JRP support and admire the vision and objective² ‘create and improve access to high quality employment and training opportunities for everyone in Doncaster.’ The LP, to a significant degree, is based on delivering 27,100 new quality high skilled jobs to produce an increase in Economic Growth to support the projection for the additional new homes target. Creation and delivery of these quality, highly skilled jobs are therefore crucial and very reliant on two basic principles: the first is education, training and apprenticeships; the second is attracting new businesses that bring with them a need for higher skilled roles. A symbiotic relationship between these two principles may create the foundations and introduce an opportunity to create new higher skilled jobs. However, the JRP have major concerns that this can or will be delivered in reality.

Listed in the updated version on page 19, the *(DIS)* Doncaster Infrastructure Strategy 2020 Report: Meeting our Long-Term Investment Needs Annex. Chapter 2 Education and Learning, 2.22 - It lists High Melton College as ‘the Hub’s sister campus to Doncaster College (known as the Hub)’, stating ‘The campus is home to many of the college’s higher education courses, and houses the Doncaster Business School, Faculty of Arts, Stables Conference Centre and Britain’s first centre of excellence for relationship studies – the Relate Institute’. As previously highlighted in Matter 2, the High Melton College no longer exists as an educational centre, having closed its doors to the last students in July 2016.

(See attached - Appendix 1)

As mentioned earlier, the National College for Advanced Transport and Infrastructure is also listed within DMBC’s evidence of its Learning and Education facilities, which it promotes as a key vehicle for student and Apprenticeships.

Unfortunately, in July 2020 it has been reported that the college was late submitting its Financial Statement of Accounts for 2018 – 2019 and is at risk of insolvency. The FE Commissioner found it would not be able to sign off its 2018 -2019 Accounts as an on-going concern and he instructed the board on how to operate while facing ‘potential insolvency’. The National College also based its 2019 -2020 Budget on having 761 apprentices and 263 full-time learners, whereas in Dec 2019 it only had 216 apprentices and 94 other full-time students.

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² Local Plan: Ch3, 3.5 (2)
Originally when it opened in 2017 it was named the High-Speed Rail College; it may still be trying to get established but these signs indicate that it has not been a success, especially as it is only one out of two, college choices available in Doncaster.

Furthermore, the DIS report 2.20 states: ‘Doncaster has one of the lowest higher education participation rates in the Yorkshire and Humber region and lies within the bottom 12 local authorities in England, with only 1% of graduates from Doncaster returning after graduation’ and goes on to state ‘Between 1-in-5 and 1-in-4 of Doncaster’s young people are not in jobs or formal education and training’.

In addition, as we highlighted in Matter 6, - changing demographics and population numbers expected, predict an increase from 19% to rise to 23.22% in the overall population of people over 65 by 2030. While conversely, ‘estimates suggest that the working age population (18-64) will decrease by 3% up to 2030’ as reflected in the Sustainability Appraisal.

DMBC have a plan set for opening a new third college in September 2020 - Advanced Engineering & Design University Technical College which, although it ‘does not provide courses in higher education’, proposes to offer full-time technical courses at both GCSE and A level to equip young people with the skills and qualifications required to enter higher education and employment.

How do we hope to manifest and produce a highly skilled workforce?

On the evidence provided, which is intended to support and promote Higher Education and Apprenticeships as a vehicle to create a skilled workforce that will be needed to fill the newly created allocation of ‘higher skilled jobs’ one might be forgiven to believe this vision is possible.

However, based on the combined stated details: - on younger demographics and education

- Demographics predict a reduction in the number of younger & working age people in the Borough
- Low Higher Education uptake
- Negligible Graduates returning to Doncaster
- Closure of the Hub’s ‘sister’ Higher Education campus at High Melton
- The only other Higher Education College available in Doncaster has failed to attract the necessary number of students and is currently operating while facing potential insolvency.

We consider, is very misleading and is unlikely to be realistically delivered.

The JRP raise valid concerns on the new jobs target. Based on the evidence presented, we cannot see how the new jobs target can be delivered or how these jobs are to be filled, and as such, we consider the target is ‘not justified’.
Overall employment land supply

DMBC has stated that 481ha of land will be needed to deliver its 27,100 new jobs target, while Sheffield Council have stated in their LP they need 152ha of employment land to deliver its 25,550 new jobs in the SCR Strategic Economic Plan (SEP) over the same 2015 – 2035 time period.

The JRP have already raised its many concerns in various Matters that the new job target for Doncaster is unrealistic. Of equal concern is our belief that the majority of new jobs that will be delivered will not be of the ‘highly skilled’ variety. We maintain, if DMBC requires three times more Employment Land than Sheffield to deliver a similar number of new jobs, then it is more likely that Doncaster will deliver more warehousing, thus facilitating the creation of more low-paid, unskilled jobs.

We maintain, the vision and objectives were the bases on which the LP was to be determined. They are not reflected within the Policies relating to Employment and Employment Land. They are contrary to the vision and objectives of the Borough stated within the Local Plan.

We strongly advocate, that as part of the Annual Review of the Local Plan, that the number of new jobs created must include a separate count for the number of ‘highly skilled’ jobs delivered. Without doing so, the LP cannot be considered ‘effective’ if it is unable to measure delivery against its own visions and objectives.

Rural Economic Development

Policy 9: Removal of Occupancy Conditions – In principle and in most cases, we believe this to be practical. However, the JRP believe this Policy could be open to abuse as evidenced by recent planning applications eg: - where the Landowner evicted a long-standing, rural tenant farmer with a viable business, allowed the site to remain vacant in order to demonstrate that there was no longer a need for this dwelling in the Green Belt with the intended purpose of seeking a condition change in order to submit a planning application to develop the site. We do not believe this ethically portrays the intended need for the inclusion of this policy. As such, we would like to have an additional caveat included in this Policy in which the owner must first provide evidence that no eviction of a viable tenant has taken place.

Matter 12. Transport and Access

Proposed road improvements

Green Belt Topic Paper 3 2020, para 2.6.13. states there are no exceptional circumstances to warrant release of Green Belt land for employment purposes in Doncaster as there is demonstrably sufficient land to deliver its employment targets on the 481ha identified.

Policies also propose that the majority of employment sites are directed to maximise locations along strategic transport road networks and corridors, similar to its SCR counterparts.
We consider these proposals, in principle, are reasonably thought out in relation to the Borough’s *existing* arterial road transport corridors.

We are supportive of the widening of the A1(M) and welcome proposals for the inclusion of a the much-needed By-pass for the A635 to alleviate congestion, improve the air quality and reduce accidents and fatalities in the AQMA’s of Hickleton and Marr. Nevertheless, we strongly maintain that these new road transport developments should not open up further employment sites for warehousing along the strategic road network in these locations in the west of Doncaster which would encroach, not only on Green Belt, but also on Prime Agricultural Land. DMBC has demonstrated that no Green Belt is required during the Plan period to deliver its new employment creation target.

Housing & Employment Site Selection Methodology & Results Report (June 2019) -Paras 7.6.20, 21 states ‘*On balance, there is enough suitable non-Green Belt employment land options in the Borough to satisfy the employment requirement and market demand at this time.*’ and ‘*With these matters considered, there are not deemed to be any exceptional circumstances which justify the release of Green Belt for employment purposes in the Local Plan*.’

We advocate that this Policy should not extend to include *new* transport infrastructure, arterial routes where these will/can only be delivered in Green belt.

To address the contradiction in these two Policies and to ensure clear and unambiguous planning direction, the Policy should be amended to state ‘*current alignment of existing road transport corridors*’.

**Promoting sustainable transport in new development**

The JRP endorses the statements in Policy 14 in addition to Policy 18, para 7.51 Walking in Doncaster, in which it states that making walking an easy choice in accessing employment and other important services is central to creating sustainable communities. Policy 17 promotes the safe and sustainable use of cycling as a mode of transport. If employment (B8) continues to be developed along the strategic road network in the west of the Borough along with residential development close by, then it is crucial that safe walking and cycling routes are implemented along the rural roads. There is little evidence so far that high quality walking and cycling networks have been integral to developments since the plan inception in 2015. Therefore, in answer to **Q12.6**: the plan is **not sound**.

All proposed residential, business and employment sites must have access to sufficient and accessible public transport or they cannot be considered sustainable. Historic bus routes and services may not meet the needs of residents and employees in large, new developments especially in rural areas

**Appendix 7** includes monitoring of transport plans/assessments in subsequent years after developments are completed, based on collected data. As in our previous submissions, we remain to be convinced that robust monitoring and evaluation has taken place in large new

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3 LP: Para 7.21, 7.22, 7.23.
developments, otherwise mitigation measures might have been implemented. New
development providing access to all modes of transport is integral for sustainable
development.

We maintain, for the LP to deliver the vision and objective\(^4\) to ‘\textit{Improve the travel choice within the Borough}’, monitoring and assessment of transport plans need to be carried out annually to \textbf{ensure the Plan is ‘effective’}.

\textbf{Matter 13. Natural and Built Environment}

\textbf{Historic Environment}

It is important that we preserve heritage significance and setting of heritage assets of the Borough and Policies 35 to 41 are needed to offer some protection from inappropriate development at heritage sites.

\textbf{Policy 39 - 11.35} goes on to state: \textit{‘This policy applies to all development within national and locally designated historic parks and gardens. Ensuring that alterations to historic parks and gardens retain the character of these landscapes will continue to retaining the distinctive local character of the Borough’}.

In any planning application, there must be a balance, understanding the impact of proposals on heritage significance should be considered as a material consideration when determining development in heritage sites, most especially, as they are irreplaceable.

We would advocate for the inclusion of Policies 35 to 41 and for these to remain within the Plan ensuring a sound and justified Plan is delivered.

\textbf{Agricultural Land and soil and water resources}

\textbf{Policy 61: Protecting and enhancing Doncaster’s Soil and Water Resources}

The Council has explained that over two-thirds of the Borough is in agricultural use, mainly in the east, while much of the west of the Borough is designated Green Belt. Nevertheless, agricultural land in the west is categorised by DEFRA as Grade 2 or 3. These gradings include some of the best and most versatile (BMV) agricultural land in Doncaster.

Balancing the need for development for housing or employment is always going to be challenging. However, it is not sustainable to remove some of the BMV agricultural land in the west for development, which would be a permanent loss.

The Council has suggested, in response to PQ46, that Part A of Policy 61 should be deleted. \textbf{We suggest that it remains}. Part A would require developers to establish ‘overriding need’ for any development if there were to be a loss of BMV agricultural land. This is crucial.

\[^4\] Local Plan: Ch3, 3.5 (8)
However, it still remains that it rests with developers to establish the actual gradings of agricultural land through on-site assessment for ‘significant’ developments.\(^5\) Is the adjective ‘significant’ a quantifiable measure in the Local Plan? We contend, it is not.

Natural England stated in response to the 2018 consultation\(^6\) that Agricultural Land Classification Surveys should be undertaken or requested from site promoters.

There has been limited assessments of land quality in the Defined Villages, with no detailed agricultural assessment of sites proposed for housing in the Green Belt to establish if they are the most suitable. Nor has there been assessments of any of the other identified and discarded sites to ascertain whether they are of a lower agricultural grade, hence better alternatives.

Currently, Landowners and/or Developers are being tasked with assessment of agricultural land to establish classification. If the client doing the assessment has most to gain financially should the land be downgraded in favour of development, the perception could be that there is no objectivity in that assessment. The JRP advocates that an independent body should do the assessment. Impartiality is crucial in order to deliver a transparent and sound plan. We do not consider this to be a sound policy.

The Local Plan\(^7\) states ‘Doncaster’s high-quality agricultural land needs to be protected from inappropriate development so that we can maximise its economic benefits such as local food production, …’. The JRP maintains that housing targets are too ambitious. Realistic, evidence-based housing targets can be met without using high quality agricultural land.

**Policy 61 is not sound**, if Part A is deleted. **Part B is not sound** because it implies that assessment of agricultural land would not be required if development was less than ‘significant’. We contend, any loss of BMV agricultural land is significant.

We feel that the Council’s suggested changes to Policy 61 are clearly not necessary and would make the policy less effective. The requirement to demonstrate ‘overriding need’ for development on Agricultural Land is, in our opinion, very well justified.

Please consider in conjunction with comments made on Matter 4 and Matter 8.

**Water resources**

The Local Plan\(^8\) states- ‘Proposals will not be supported which would have an adverse impact on the ecological status or recreational value of rivers and other water bodies, such as Flood Storage Areas’.

The JRP, as previously noted in Matter 4, site 777 at Harlington/Barnburgh has a boundary next to a Flood Zone 2, as well as being adjacent to a Flood Storage area from the River Dearne

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\(^5\) Local Plan, Policy 61, Part B.  
\(^6\) Doncaster Local Plan 2018 Draft Policies and Proposed Sites Consultation Summary, Qu33.  
\(^7\) Local Plan, Policy 61, 14.24  
\(^8\) Policy 61, Part E,1
Environmental Agency Map 2020). As such, we maintain this site should not be supported for development within the Local Plan as it is contrary to DMBC’s own vision and objectives\(^9\) and is contrary to Policy 61 as stated. We advocate the site be removed from the LP as it breaches policy. **It is neither justified or sound.**

**Air Quality**

Doncaster Infrastructure Strategy 2020 update Report 1.22, Transportation in Chapter 1, under Planned Projects page 6, states: ‘**The A635 corridor is one of the most congested corridors in the city region and reflects the fact that it is the only east-west route between Barnsley and Doncaster and there are no direct rail services between the two centres**’ and 1.25 goes on to say: ‘**The A635, which passes through the villages of Hickleton and Marr is currently a low capacity, single carriageway road. The high volumes of traffic experienced along the road causes severance issues in both villages, as well as significant air quality challenges. Both villages are conservation areas and Hickleton is designated as an Air Quality Management Area**’.

Although the Report has been updated it does not include the most recent data: The village of Marr was designated the 8\(^{th}\) Air Quality Management Area in the Borough, in March 2020.

Doncaster annually produces an Air Quality Action Plan, however these action plans are very generic to reduce pollutants across the Borough. It is well documented in Policy 55 how harmful air pollutants are to health and well-being: -

13.18 States: - ‘**National planning policy in the NPPF aims to minimise pollution and other adverse effects on the local and natural environment. It seeks to prevent unacceptable risks from pollution …. Taking into account direct and cumulative effects on health**…’

13.21 States: - ‘**The quality of the air we breathe is affected by many factors. These include emissions from exhaust gases from traffic. Poor air quality is a serious public health risk and locally is a major factor in the reduction of life expectancy. National and local planning policy seek to sustain compliance with, and contributions towards meeting, EU limit values or national objectives for pollutants. AQMA’s are declared locally where particular action needs to be taken to improve air quality objectives and standards**’.

Along the A635, traffic volume has increased and resulting congestion is exacerbating already dangerous high levels of Air Pollution. Fumes from road vehicles have created poor Air Quality through both Marr and Hickleton, with NO\(_x\) levels consistently above and in excess of 150% of the maximum permitted levels set by DEFRA.

Air Quality levels at Hickleton are the **highest** recorded in Doncaster, with *Friends of the Earth* stating they are **2 of the Top 10 worst places in England** in their 2020 National Air Pollution Survey.

\(^9\) Local Plan, Ch 3, Climate change and Natural resources.
We advocate that the Policy includes more focused Action Plans that are specific to each of the designated AQMA’s to reduce air pollution in these locations.

We believe, with a growing number of AQMA’s in the Borough, it is reasonable to adopt and promote a more focused approach to reduce traffic emissions and pollutants, aligning with the Vision and Objective\(^{10}\). We strongly advocate that the Policy be amended to reflect this. Further, it demonstrates commitment to EU and National regulations, is compliant with Policy 55 and contributes to a more effective, sound and justified Local Plan, consistent with National Policy.

**Public Benefit/Interest**

The Local Plan Policy document is peppered with statements regarding public benefit/interest as reason to support development, for example in Policy 38\(^{11}\) it ‘describes in detail the criteria by which proposals will be assessed in determining applications in or affecting conservations areas. The policy also explains exceptional circumstances where harm may be accepted. Harm may be localised to a part of the conservation area or (particularly in small conservation areas) may be substantial. Public benefits may be anything that delivers economic, social or environmental progress but should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit’.

National Policy makes only one reference to ‘Public Interest’ in regard to National Parks, the Broads and Areas of Outstanding Natural Beauty, where the NPPF guidelines 172. state ‘Planning permission should be refused for major developments other than in exceptional circumstances, and then only where it can be demonstrated that the development is in the public interest’.

The NPPF is clear on where a ‘Public Interest’ determination should be applied, with this being specific and relates only to outweighing development being proposed in areas afforded the highest status of protection, as listed.

In all other cases, National Planning Policy is clear, development is decided where ‘exceptional circumstances’ or overriding need can be determined.

Although DMBC has stated what it considers to be a Public Benefit/Interest to be, we contest that this rider could mean that any/all development could be approved in any/every area, in every eventuality, since any proposed development in principle, is likely to deliver at least one of the benefits listed.

Inclusion, means that potentially all NPPF- afforded protection of Green Belt and Agricultural Land will/can be outweighed regardless of whether ‘exceptional circumstances’ or ‘overriding need’ can be demonstrated. As a consequence, it reduces nationally-recognised protection of Green Belt and BMV Agricultural Land.

\(^{10}\) Local Plan, Ch3, 14.
\(^{11}\) Conservation Areas, Part B. 11.24
In our very strong view, this terminology needs to be removed from evidence and Policy documents, as applying ‘Public Interest/Benefit’ within its Policies renders the LP, unsound, unjustified and inconsistent with National Policy.

Matter 16. Other Issues

The JRP believe Issues of Omission—what is missing, is of equal importance, as the proposed content submitted for review on the emerging Local Plan for Doncaster.

Enforcement and the Local Plan

Core to the Local Plan should be robust and effective enforcement - a clear policy and unambiguous implementation. The NPPF\(^\text{12}\) states that ‘**effective enforcement is important to maintain public confidence in the planning system...**’. In our view the cornerstone of an effective and sound plan is effective enforcement.

The Local Plan makes three references to enforcement:

- in the context of how it may be used in HMO's (to ensure that the negative impacts are managed)
- mineral extraction (to ensure that conditions that mitigate negative impacts are complied with)
- gypsy/traveller sites which are immune from enforcement.

There is no overarching reference to enforcement in the Local Plan and its key and integrated role in ensuring that plan objectives are met.

Also, there are no references to enforcement in key areas such as: unauthorised developments in Green Belt, Conservation Areas nor to Listed Buildings.

DMBC drew up an Enforcement Policy in 2015, but the implementation of this policy has been totally ineffective. The planned holistic and proactive approach has not been put in place and in our experience, there has been little actual enforcement, even in key areas such as unauthorised development in Green Belt. The lack of effective enforcement has historically been blamed by Enforcement Officers on lack of resources "**severely affected by the long-term sickness of two staff members along with a reduced officer capacity - this has been a borough wide issue and in reality, it leaves only two principal planning Officers to 'fire fight' the case work.... Every day you plan your case work only for something of a far worse impact disrupts the best laid plans of mice and men"**.

Also, the 2015 Enforcement Policy only refers to 'old' plans such as Doncaster’s Corporate Plan 2014-2017, Doncaster’s Core Strategy 2011-2028 and saved UDP policies; no updates have been made and no reference is made to the Local Plan.

\(^{12}\) NPPF para 58
We believe, with such ambitious targets for employment and housing development, this must equally be accompanied, by a robust ‘checks and balance’ system. Enforcement plays a vital role to ensure this balance is maintained, by ensuring all development is compliant and delivers to the high standards as well as, the requisite, specified planning conditions.

Until these issues of ineffective enforcement are addressed and until enforcement is integrated into the Local Plan, then in our very strong view, the Local Plan can neither be regarded as ‘effective’ nor ‘sound’.

Community Interests

The LP states and the JRP have mentioned in previous Matters: Developments should be in the interests of the communities and of the villages.

Parish Councils, on behalf of residents, have objected strongly to some of the proposed developments which they believe do not comply with the guidelines, are contrary to the NPPF and the Council’s own Policies on this issue.

Nowhere in the Local Plan does it show how interests of the community have been, or will be, measured and assessed, nor is this included in the Annual monitoring review.

We maintain, that this is an omission and is lacking in the LP. It needs to contain and include a Community Involvement Policy – a Policy where communities’ interests, engagement and involvement are equally represented and valid. For Council transparency, and to ensure the LP is effective and can be justified, these must also be included and reviewed annually.

Monitoring

LP Policies, Page 182 – ‘The Council will produce an Annual Monitoring Report...’ and Part A states: ‘The ‘Annual Monitoring Report will monitor progress of the Local Plan against indicators’. And 15.12 states: ‘that this will assess the progress of the Local Plan against the milestones set out in the “Local Development Scheme”’ and the extent to which the polices are being achieved and targets met’.

15.13 states: ‘It is likely that during the course of the LP circumstances that have a bearing on development will change. .... The economy will evolve ....’ and ‘...the Annual Monitoring Report will track the progress of the LP in meeting the Plan’s objectives and the implementation of its policies’.

15.14 states; ‘The Local Plan’s monitoring indicators are set out in Appendix 12 have been developed to conform with national guidance and local relevance’.

The JRP note that most indicators are to be monitored annually, however we note that obscurely, Mineral Extraction (Matter 15) is only planned to be reviewed every 5 years.

We strongly recommend, to ensure there is consistency across the LP that it should also be necessary for Mineral Extraction to be included within the annual review.
In Matter 8, we strongly advocate, that as part of the Annual Review of the Local Plan, that the number of new jobs created are calculated and that this monitoring must include a separate count for the number of ‘highly skilled’ jobs delivered. Without doing so, the LP cannot be considered ‘effective’ if it is unable to measure delivery against its own visions and objectives.

In addition, the LP plan contains numerical evidence on new house delivery, however, we have found no evidence in any report or document which relates to, or data which states - the actual number of new jobs created in the first 5-years of the LP, nor how many of these were considered highly-skilled?

Projected housing targets have to some degree been supported by delivery evidence and the number of new houses built over the last 3-years, however there is NO NUMERICAL EVIDENCE to demonstrate that the new jobs target is in line with the target trajectory.

We consider this data needs to be provided. It is an essential and a very necessary milestone to ascertain if the emerging Local Plan can be considered sound, justified or effective.

Additionally, the JRP note that although Monitoring is mentioned in the Local Plan, NO POLICY has been designated. In view of the issues we raise, the JRP overwhelmingly believe Monitoring should be assigned as a Policy within the emerging Local Plan.

Balancing housing development delivery, Job creation and Community Involvement along with Economic Growth is integral to delivering a sound and justified Plan. As such, all criteria need to be measured annually against the set targets to ensure the Local Plan is delivering on its key Visions and Objectives.

The JRP welcomed the opportunity to participate in the Examination of the Local Plan for Doncaster.

And, on behalf of the JRP and the residents that we represent, I would like to thank the Inspector in advance, for reading our Written Statements and for considering the issues we raise, in his deliberations.

Rhonda Job
Chairperson - Joint Rural Parishes

Grove Farm Bungalow
Church Lane
Marr Doncaster
DN5 7AU
APPENDIX 1 to Matter 8.

High Melton

However, contrary to statements already made in the DIS report, on page 35, under Planned Projects 6.14, it lists Film and Television studio High Melton, stating: ‘Grant funding of £4.1m of Local Growth Fund (LGF) from the SCR for a new film and television studio on the site of the former High Melton campus for Doncaster College has been secured. The scheme headed by 360 Degree Media incorporates film and TV studios, a visual effects production facility, a film and TV training academy and a hotel and events business’.

As previously raised in Matter 2 - We are informed, that 360 Degree Media has subsequently lost this grant funding as the time period has now expired but is now seeking to designate this site as a Special Policy Area or a Major Development Site in the Green Belt.

New proposals appear to include housing development on the 23ha (50 acre) site as well as massive construction of tall sound studios. The purported 6,700 new jobs can only be considered a fabrication if it is indeed to be retained as an education facility. Alternatively, if there are intentions for this to be a vast commercial business development venture, this would account for the projected new jobs estimation. As a result, it is still very unclear what is actually being proposed on this site.

At no time during the Consultation stages for the emerging LP for Doncaster has the site been considered for any type of development either for new homes or as a commercial employment site, with the only reference made to it as a higher education facility.

The location has not been assessed in the Green Belt Reviews, it is not included in the list of sites recommended to be removed from Green Belt for new home development, nor is it listed in HELAA as a potential site for new homes.

Further, the Housing and Employment Land Availability Assessment (2018) - Does not list this village as an employment, regeneration location nor does it include this site within the list of Employment Land earmarked for employment.

We are at a loss to understand why this Heritage Park and Garden site in Green Belt, which is within a Smaller Defined Conservation Village is only now under consideration for development when the evidence and Policies in the LP already state that no sustainable development is/can be expected or delivered from these villages. The Plan already identifies what sites are being proposed for housing & employment as well as stating that there is an availability of employment land which can be easily met outside the Green Belt for the purpose of new employment.
We strongly maintain, that since there has been no community engagement on either proposal, both are in breach of the Localism Act and that both development scenarios are contrary to DMBC’s own Policies and the NPPF Green Belt regulations.

We strongly advocate that this site retains its status and remains an Educational Centre.

We maintain, there is no evidence or Policies in the LP to support an Employment Policy Area type be adopted for this site.

We strongly recommend this site be excluded as a Special Policy Area or Major Development Site in Green Belt for Employment or as Housing development, as neither options are sound nor can it be justified.