Matters 1 Public Consultation and Involvement / Neighbourhood Plans

The public consultation process is unsound; it has not attained enough of the Doncaster community, the involvement of the public was sparse, in the October 2019 consultation approximately 1200 people responded out of the whole borough of Doncaster (approx 300,000) in October 2018 responses from 1600 people submitted, that is a meager amount of interest.

From the start to present the whole procedure has not been publicised nearly enough, hasn’t reached enough people, if I didn't have an interest (objecting to a major employment development straight opposite my home) then I too would know nothing of the plan and would warrant that many members of the community would be of the same opinion.

In order for the plan to reflect what members of the Doncaster public want then the first instance is to make sure they are aware of it, if they are aware of how certain aspects could potentially affect them either in a positive or a negative way then they should have the opportunity from the start of the process to comment, it seems as if it’s easier to keep it quiet so Doncaster Council can create a plan to suit them rather than its
residents. The Council should have done much more in the way of making the public aware and interested in the future of Doncaster the very few responses received from the public goes to prove this point.

Council examination documents, DMBC10 Appendix PQ11 Flood Risk Allocations - councils response to the inspectors questions DMBC2 Topic Paper 2 Flood Risk, see attached

The council state site 001 the site “has some support from the community of Thorne” why did the council feel the need to add this comment when the question is in relation to flood risk?

I emailed the council to request evidence of this support from the community of Thorne, this is the response:
By undertaking a search in Appendix 1 with the phrase ‘Junction 6’, you will be able to see that there are a number of representations supporting Site 001 over Site 160 Bradholme. These representations are listed below in numerical order:

- 02106 – Simon Trotter
- 02107 – Annette Trotter
- 03073 – John Coxon
Out of the above names only three specifically stated site 001, the remainders stated
"Junction 6 where there is already an employment site " or similar wording, the existing employment site they refer to is over a mile away with a barrier which is the M18 motorway in between.

Three representations does not warrant support from the community of Thorne, why have the council totally disregarded the two petitions submitted with a total of 499 signatures plus 286 letters submitted in October 2019 all objecting to Site 001 as Employment Land? Why have they totally disregarded and chose not to include this information in their reply to the Inspectors question? This is not the first time when a request for information / evidence where they have stated site 001 is the preferred site / support of the community that they have not been able to provide the information / evidence or what they have provided is as inaccurate as above or they simply ignore the request.

In October 2018 local plan consultation the council received objections to Site 160 Bradholme a petition with 60 signatures and a total of 151 objection letters this is the reason why Site 160 is now an omission site and Site 001 is now proposed, where is the Councils justification to now propose Site 001 when as I stated above in Local Plan Consultation period October 2019 the council received more objections for Site 001 than Site 160 received in 2018?

Colliers International Land Review 2018 awards the original proposed site, Site 160 a far better more positive assessment than it awards Site 001.

The local plan takes data from Neighbourhood Plans and supports its conclusions,
Thorne and Moorends Neighbourhood Plan, the plan has been with Doncaster council in a stagnant state since March 2017, still in draft form it is Regulation 14 so therefore with regards to planning it is “moderate weight” important information has just been submitted to the local plan offices with regards the consultation summaries and the fraudulent use of a map and the answers to questions the local community submitted this is the response:

Please find below the response to your email that was sent on the 13th August.

Many thanks
Sennette

To whom it may concern,

The Planning Policy and Environment Team have put together the response below.

We would like to advise that the inspector has published his Matters Issues and Questions for the Local Plan. You now have the opportunity to submit a written statement in response to the inspectors questions. We would advise that this is now the most appropriate forum to raise the concerns you have about the Local Plan process.

We do not intend to comment or respond to any of the points raised in your email and would advise that in relation to the Local Plan, this is now a matter for the inspector to
consider, should you wish to raise these points in a written response.

With regard to the above information and the advice from them that I should include it in a written statement to the inspector as they are not going comment, these are the concerns raised in the email to them:

“Dear Ms Stimpson
An inquiry was submitted to Thorne and Moorends Town Council requesting the evidence from the Neighbourhood Plan summaries that show that Site 001 which borders Selby Road / North Common Road was specifically selected for proposed allocation to Employment Land by the local community.

I attach part of an email from the Clerk with his response

1. Of the 58 people that completed the question on specific employment allocation policy 58 people agreed that employment sites should be in line with the proposed allocations at the time. Those allocations included Selby Road and North Common Road as well as other sites and are shown on the attached map.

The Clerk was then asked as to which question had been asked on the questionnaire where 58 people had responded with regards proposed Site allocations? His response was :-
"Do you agree with Policy GE1' which is protecting existing employment sites and those proposed for allocation by DMBC which is the sites coloured purple on the plan that was with the questionnaire".

An email response was sent to him with regards the procedure of the plan:-

The map (plan as the Clerk refers to it) which you attached to the email was taken from page 2 of the Document entitled Thorne Moorends Neighbourhood Plan Consultation on Policy Areas October 2014 and was named as the 'THORNE & MOORENDS SITE MAP' and was included in the document as guidance for local residents to refer to when completing the associated questionnaire form on policies.

With regard to the above named map which the Thorne Moorends Neighbourhood Plan Working Group included in the document we make the following points:-

A) The area in purple which borders North Common Road and Selby Road (Site 001 Junction 6 M18) was proposed as employment allocation in the former Sites and Policies DPD this was withdrawn by Doncaster Council on the 25th September 2014. In October 2014 Doncaster Council had instigated a new 'Call for Sites'.

In October 2014, at the time of this public consultation Site 001 Junction 6 M18 North Common Road /Selby Road was not proposed for allocation for employment land no sites were. This area should not have been included on this map for the public to comment on. The inclusion of this area is deliberately misleading.

B) If the map was valid at the time of the public consultation in October 2014 the areas showing a proposed employment site and an existing employment site should have
been defined by using different colours, the areas in purple along the right hand side of the M18 are all existing employment sites (not proposed sites) Capitol Park, Omega Boulevarde, BMW, Nimbus Park. There is nothing that distinguishes between a proposed site and an existing employment site. It should be made absolutely crystal clear which areas are 'proposed' and which are “existing” sites so members of the public have 100% clear understanding of the information they are provided with and so able to answer the questions correctly.

On page 6 of the Thorne Moorends Neighbourhood Plan Consultation on Policy Areas October 2014 Document, Policy GE1 is set out as below:

POLICY GE1: PROTECTION OF EXISTING SITES
Policy will complement Doncaster Local Plan policy in seeking to ensure that employment sites allocated and in existing use are safeguarded for future employment use.

The public were asked in the Consultation on Policy Areas October 2014 Questionnaire to respond to 'Do you agree with the General Employment Policy GE1?' and 58 people said yes.

The 58 people were agreeing to safeguarding allocated and existing employment sites as set out in the policy above and not the proposed allocation of new ones.

The question is worded quite clear, it does not mention or is asking about the safeguarding of proposed employment allocations.

The map named as the 'THORNE & MOORENDS SITE MAP' in its form presented on page 2 of the Consultation on Policy Areas October 2014 Document should not have
been included as it was invalid, totally inaccurate, disingenuous information submitted to the public who took an interest in the plan.

It should not be documented anywhere in the plan that 58 people agreed that employment sites should be in line with the proposed allocations at the time. North Common Road / Selby Road was not proposed for allocation for employment land use at the time of the public consultation in October 2014 so no reference should be made that this area is the 'preferred site for employment by the local community'.

The process and information with regards to the above collated by Thorne Moorends Neighbourhood Plan Group is unsound, totally inaccurate and most definitely a misrepresentation of the public and that is wrong.

What is the point of a plan of this importance when information gathered at the consultation period is falsely recorded.

The above information has been brought to your attention previously yet for some reason you seem to disagree with the facts stated above and just disregard the concerns that members of the public have with regards the preparation of the Thorne and Moorends Neighbourhood Plan. The above are true facts which should not be ignored or totally disregarded by you.

The plan has been with you since March 2017 it has been prepared with incorrect information, information that does not represent the local community and their views, the community has in fact been fooled, deceived with the questions asked in relation to the
policy and more importantly the fraudulent map, a vast amount of tax payers money spent on its preparation, this document will be used to support the Doncaster Local Plan and the information included in it is inaccurate and fraudulent in the way it has been obtained, who ever monitors the process whether it’s yourself or other parties needs to stop any further process with regards the plan, acknowledge the information we have provided is correct and submit statements refuting information recorded which is contrary to our findings, as it stands it is not fit for purpose, it should be scrapped, most definitely not passed to the final stage / adopted. Please do not ignore our email and the extremely important information we have included in it. We look forward to receiving a prompt response addressing our concerns.

Thorne and Moorends Councillors will preach at every given opportunity with regard how comprehensive the consultation was carried out, Jane Stimson Local Plan Officer described it as “the most comprehensive consultation she has seen” according to Councillor Joe Blackham and Councillor Mark Holbrook “concurs with that.” The information collected from the community with regard the preference of sites for employment and housing is contrary to what has been included in the draft plan, what’s been published is not the preference of the very few members of Thorne and Moorends community that were interested / bothered to take the time to complete the questionnaires and that is unacceptable practice.
For reasons above the local plan is not sound or justified.

Matters 1 Floodrisk

Q1.12. Are the spatial strategy and allocations in the Plan, including those listed above, consistent with national planning policy relating to development and flood risk?

Site 001 - Thorne North Junction 6 is in flood zone 3 high probability of flooding, vulnerable area.

The Councils Topic Paper 2 Flood Risk

2.2 Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future) where development is necessary in such areas the development should be made safe for its lifetime without increasing flood risk.

Where is the justification that DMBC have provided that states the development of this
Where is the explanation and guarantee from DMBC how they plan to make this development safe for its lifetime without increasing flood risk?

National Policy makes it very clear that flood risk in the plan must be managed through a sequential risk based approach to make sure all new developments are in areas at the lowest risk of flooding where this is not possible then a Level 2 Strategic Flood Risk Assessment must be carried out. The Councils Topic Paper 2 Flood Risk states:

The council acknowledges that in order to assess the likelihood of potential sites passing the exemption test and therefore being compliant with the NPPF we must produce a Level 2 Strategic Flood Risk Assessment once the Environment Agency models are completed in order to be consistent with National Policy. By allocating Sites without a Level 2 SFRA in an area with such complex flood issues is inappropriate.

The plan has been prepared without a Level 2 SFRA, this is a crucial important element with regard to the site selection process and consistent with the requirements of National Policy. The council are proposing this site for major development 180 acres of land in flood zone 3 high probability of flooding without the mandatory tests as stated above.

This is an area at high risk of flooding, although it does benefit from flood defences...
where as alternative sites don’t the reason being is because this is the only vulnerable area / site in danger of flooding from a main river, alternative sites are not at high risk of flooding from main rivers so do not need flood defences to prevent flooding. Why have the council proposed the most vulnerable site at risk of flooding for employment land?

The distance from the banks of the River Don to the proposed entrance (Lands End Road) to Site 001 is 50m (correct measurement) Jubilee Bridge which is a low point was in danger of overtopping in November 2019 and March 2020 resulting in flood warnings in force in this area with the travellers camp having to be quickly evacuated, information received from the EA to myself states that there were concerns that water was sleeping through the flood embankment adjacent to Jubilee Bridge, as it was going to take a while to get an engineer to the site to inspect it the decision was taken to evacuate the travellers camp, if overtopped this land would have acted as a floodplain potentially saving existing properties from flooding, the devastation the flooding left homes and business in the nearby village of Fishlake in November 2019 should not be ignored, these are very important facts and should be taken into account, due to climate change river levels are expected to rise, we are to expect increased flooding in vulnerable areas, this and the surrounding areas are at real risk of flooding, the land should be left as agricultural farm land to be used if required as a natural flood plain. Development in this area is not sustainable, in the long term development should be located at an alternative site, to a more sustainable location less chance of flooding / harm to homes and businesses.
Site 001 fails the sequential test “the aim of the sequential test is to steer new development to areas with the lowest risk of flooding, development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding” there are other sites of similar size in less vulnerable areas with a lower risk of flooding, Site 160 to the south of Thorne is of similar size it is less vulnerable it is of significant distance from the River Don and River Trent with motorway and railway barriers in between the rivers and site, the Environment Agency and Internal Drainage Board have confirmed Site 160 is located outside of the area of risk of flooding from main rivers and that the main source of flood risk would be due to potential failure of a pumping station, so therefore a flood defence is not needed to protect it. With regard to flood risk Site 160 is much less vulnerable than Site 001, what justification can the council give for proposing Site 001 which fails the sequential test over an alternative site that is less vulnerable and in danger of flooding?

The Environment Agency have not completed the Hydraulic Modelling for this area, the evidence and information provided by this is crucial to the allocation of sites for employment and housing and needs to be acknowledged, yet the council have stated in the draft plan that “the modelling is complete and that it’s given a better understanding of the area” to state this is incompetent and erroneous of the council.
Because this area North of Thorne is a vulnerable area situated so close to the River Don, the council needs to justify developing Site 001 will provide wider sustainability to the community that outweigh the flood risks, the development will be safe for its lifetime taking into account vulnerability of its users without increasing flood risk elsewhere and where possible reduce flood risk overall?

Justification is required from the council that local community’s homes and businesses get a guarantee that by major development of Site 001 homes and businesses will not flood, the council has to be accountable, these policies are put in place for a reason and should be adhered to.

For the above reasons the plan is not sound or justified.