

Doncaster Local Plan

Informal Consultation: Draft Policies and Proposed Sites

RESPONSE FORM

Doncaster

ouncil

Please respond by **5pm Friday 26th October 2018**.

We would prefer you to **email your completed form to us at** <u>localplan@doncaster.gov.uk</u> If you can't use email, hard copies can be sent to: Local Plans Team, Planning, Regeneration and Environment Services, Doncaster Council, Civic Office, Waterdale, Doncaster, DN1 3BU.

All of the consultation documents (including this form) are available at: <u>http://www.doncaster.gov.uk/localplan</u>

This form has two parts: Part A – Personal Details and Part B – Your Comments

Part A

Please complete in full. Please see the Privacy Statement at end of form.

	1. Personal Details	2. Agent's Details (if applicable)
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Part B

A separate consultation booklet summarises what we are consulting on. It includes frequently asked questions.

Please comment in response to as many of the following questions as you want. Please be as brief as possible to help us analyse and respond to your comments.

If you are a Planning Agent, you DO NOT need to resubmit previously submitted information and please DO NOT submit duplicate statements on behalf of different clients.

Local Plan Vision and Objectives

Q1	Do you agree with the Vision and the Objectives? If not, how should they be amended?
	We would appreciate the consideration of the addition of an aim to 'halt biodiversity loss' within the next 15 years and to 'strengthen and enhance ecological networks.'
	We are encouraged by the inclusion of point 7. and 15 within the vision and objectives to 'protect and enhance our green and blue infrastructure' and 'diversify and support the rural economy whilst protecting and enhancing the character and appearance of the countryside and natural environment, including areas of landscape and biodiversity value' however feel these could be strengthened to ensure clarity with NPPF by including 'by providing net gain in biodiversity'.
	Furthermore, point 18. 'ensure that Doncaster adapts to the effects of climate change through careful planning and design of developments' we feel could incorporate the encouragement of use of ecosystem services including SUDs and natural flood management.

Policies and Proposals

Q2	Do you agree with the policies? If not how should they be amended? (Please quote policy number(s) when commenting).
	Overall we are pleased to see that the policies provide a strong foundation for the protection of biodiversity within Doncaster. However, there are a few considerations we feel could be had to further strengthen them in order to future proof the ecological functionally of the region.
	Policy 7 We would encourage the inclusion of support for developments within this locality which aim to create an ecologically coherent network and achieve net gain in biodiversity (through DEFRA metrics) across the Doncaster Sheffield Airport Site as a whole.
	Policy 27

A) 2. creates or enhances green corridors, including rights of way; 3. provides specific and dedicated spaces for wildlife to encourage a more robust and connected network of habitats;

This statement could also include reference to protect and enhance areas to create an ecologically coherent network across Doncaster. This should include mention of the Nature Improvement Area's (NIA's) which extend across Doncaster, including Dearne Valley Green Heart and Humberhead Levels.

4. considers tranquillity and provide for generous biodiversity rich open spaces;

This statement could benefit from the inclusion of '*providing a net gain for biodiversity*' through the usage of DEFRA metrics.

9. helps people and wildlife adapt to the impacts of climate change by including naturalised forms of flood storage and/or incorporating additional tree planting within developments,

This statement could include mention of encouragement of the use of ecosystem services and designs such as SUD's and natural flood management.

B) 3. Enhance the local environment

This section could be further strengthened by including mention of improving water quality and functionality/connectivity of ecological networks.

Policy 28

We feel this policy could be further strengthened by including mention that development not being supported in areas likely to harm biodiversity value unless in exceptional circumstances.

Policy 30

B. Maintaining, strengthening and bridging gaps in existing habitat networks; This policy could be strengthened to include mention of how developments which fragment or impact on priority habitats or ecological networks will not be permitted unless in exceptional circumstances and not without the provision of a net gain in biodiversity. Particular reference to the NIA's across Doncaster should be made.

Policy 31

A) 2. They use a biodiversity offsetting metric to demonstrate that a proposal will deliver a net gain for biodiversity;

We are encouraged by the inclusion of Local Wildlife Sites (LWS) in this policy and the inclusion of metrics for net gain for biodiversity, however feel this should be expanded to include all developments, not just those which will impact designated sites. We would also like to see this with reference to the use of DEFRA metrics.

3. they protect, restore, enhance and provide appropriate buffers around wildlife and geological features;

This could also include the mention of connectivity for ecological networks.

Policy 32

This policy should include mention that proposals will not be supported which will impact upon a LWS unless in exceptional circumstances.

Policy 33

D) sufficient provision of appropriate replacement planting where it is intended to remove trees and hedgerows; and

This statement could include the mention that replacement planting should favour native species of local provenance.

Where suitable mitigation measure are not achievable on site, then development should provide appropriate compensation off site.
mpensation should be made clear that it must achieve a net gain in biodivers courage the connectivity of ecologically coherent networks.
could encourage the incorporation of natural flood management.
could encourage the usage of ecosystem services.
velopment has no significant adverse impacts, including cumulative
on the built and natural environment and ecology;
nent could include reference to achieving a net gain in biodiversity and
ion of impacts of flight paths for species such as bats and birds.
encourage this policy to support the restoration of sites to achieve a net gain y.

Q3	Are any there any missing policies?
	N/A

Q4 Can you suggest issues that must be explained by explanatory text to aid interpretation and implementation of the policies? (Please quote policy number(s) when commenting)

Policy 7

We would encourage the inclusion of support for developments within this locality which aim to create an ecologically coherent network and achieve net gain in biodiversity across the Doncaster Sheffield Airport Site as a whole.

Due to the large size scale of the development there is a great opportunity to enhance the biodiversity and ecological quality of Doncaster through provision of wildlife networks and the creation of new habitat. This would be in line with NPPF by making effective use of the land and creating access to nature. Proposals in this area should be subject to the same conditions as the rest of the district and expected to achieve a net gain in biodiversity. This should be encouraged by retaining buffers along boundaries of sites to create and maintain connective corridors for wildlife whilst preserving the functionality of the site and adjacent local wildlife sites. Areas should be subject to planting of native species of local provenance and appropriate management plans such as relaxed mowing regimes. This would aid the construction of a '*bigger, better, more joined up*' ecological network as recommended by the Lawton Review (Making Space for Nature).

Policy 27

The aim of these policies should be to halt biodiversity loss and create an ecologically coherent network across Doncaster, as well as enhance the current NIA's.

Encouragement should be given to the retention of trees, woodlands and notable habitats across the district, along with planting of new habitats and connective corridors as appropriate to that area. This would aid the construction of a '*bigger, better, more joined up*' ecological network as recommended by the Lawton Review (Making Space for Nature).

The text should be expanded to explain the requirement for the provision of a net gain in biodiversity to bring it in line with NPPF (paragraph 170 and 174).

'170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;'

'174. To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.'

Net gain for biodiversity could be achieved through the usage of DEFRA metrics (see comments on Policy 31 below for more detail).

All proposals which will impact upon green and blue infrastructure should therefore undertake appropriate ecological assessments prior to the commencement of any works on site (including site clearance) in order to achieve a suitable baseline and identify areas for retention and enhancement.

The text should also explain the importance of ecosystem services and how they can help Doncaster achieve a '*low carbon borough'* through well planned design. Features to achieve this should be incorporated within proposals for example through the design of SUD's and the use of natural flood management. SUD's should incorporate features of value to the local ecology to also provide a net gain in biodiversity.

Policy 28

It should be made clear within the text of this policy that development will not be supported if it is viewed to result in a net loss to biodiversity for example, impact upon notable or rare habitats/species for that locality or fragment ecological networks.

Policy 30

The text for this policy should include mention of how developments will not be supported should they fragment or impact upon notable or rare local habitats/species or current NIA's; and how there should be a provision in net gain for biodiversity (see Policy 31 below) across the district. This should aim to create an ecologically coherent network across Doncaster as is in accordance with NPPF (paragraph 170).

The text should mention how developments which fragment or impact on priority habitats or ecological networks will not be permitted without the provision of a net gain in biodiversity. There should be an aim across the county to protect and enhance corridors and stepping stones of habitat which allow species to move between core areas of important habitat; along with buffer zones to protect particularly sensitive core areas (as detailed within the government produced document: The Natural Choice). These features are generally of high importance for bird species (such as those found at Potteric Carr) which can be highly sensitive to disturbance through loss of habitat, noise, footfall and lighting. We would therefore strongly encourage the inclusion of protective buffer zones around notable habitats, in particular sites such as Potteric Carr.



Figure 1. The components of Ecological Networks (see The Natural Choice³ for more details)

Policy 31

We are encouraged by the inclusion of Local Wildlife Sites (LWS) in this policy and the inclusion of metrics for net gain for biodiversity, however feel this should be expanded to include all developments, not just those which will impact designated sites as is detailed by NPPF (174).

We would highly regard DEFRA metrics to be utilised as these have been adopted, and proven to work efficiently, by other local councils including Lichfield (who adopt a 20% net gain protocol for all development) and East Hertfordshire:

Excerpts from East Hertfordshire Local Plan:

'20.2.10 In order to objectively assess net ecological impacts and therefore achieve net gains in biodiversity, as required by NPPF, it is vital that a fair, robust mechanism for measuring these impacts is applied. To ensure they are consistently quantified, the application of the DEFRA and NE endorsed Biodiversity Impact Assessment Calculator (Warwickshire County Council v18 2014 or as updated) will be required for all development with negative impacts on biodiversity. Proposals will be expected to show a net gain in ecological units following development.

20.2.11 It is important that a consistent, acceptable standard of supporting ecological information is supplied with planning applications. In order to ensure this, it will be expected that ecological information is presented in accordance with the British Standard on Planning and Biodiversity – BS42020 2013 Biodiversity – Code of practice for planning and development.

Policy NE1 International, National and Locally Designated Nature Conservation Sites

IV. Ecological impacts will be quantified by utilising the Biodiversity Impact Assessment Calculator (BIAC). Development must demonstrate a net gain in ecological units. Ecological information must be supplied in accordance with BS 42020 2013.

Policy NE2 Sites of Nature Conservation Interest (Non-Designated)

I. All proposals should achieve a net gain in biodiversity, as measured by using the BIAC, and avoid harm to, or the loss of features that contribute to the local and wider ecological network.

II. Proposals will be expected to apply the mitigation hierarchy of avoidance, mitigation and compensation, and integrate ecologically beneficial planting and landscaping into the overall design.'

The text should also mention the requirement for a suitable level of ecological survey to be conducted by a professional prior to the commencement of any works (including site clearance) to ensure an appropriate baseline condition can be established.

As mentioned above within Policy 30, buffer zones should be included around all designated sites in order to retain and potentially enhance their functionality. For example, at Potteric Carr SSSI, the inclusion of a buffer (such as the current arable land) will protect high tide roosting habitats during flood events and notable species from additional disturbance.

Policy 32

This text should include mention that proposals will not be supported which will impact upon a LWS unless in exceptional circumstances. Any proposals within proximity to the LWS should incorporate a sufficient buffer to protect the site from increased disturbance and 'edge effects'; and be conducted through a suitably designed masterplan, achieving a net gain in biodiversity and enhancing connectivity to the LWS.

Policy 33

The text should make it clear that all trees, woodlands and hedgerows should be retained where possible. There should be clarity of the requirement of both arboricultural and ecological professional assessments of such features and developments should be encouraged to incorporate tree and hedgerow planting of native species of local provenance, with suitable consideration made for their usage as boundary treatments.

Policy 34

The text should make the requirement for the incorporation of sensitive landscape plans (with respects to ecology) which achieve a net gain in biodiversity based on DEFRA metrics and encourage the connectivity of ecologically coherent networks both across the site and wider landscape. Any off site compensation should be focussed in areas where networks can be enhanced and afforded long term protection.

Any landscaping or mitigation should include appropriate management plans and protection from harm such as vandalism and future development.

Policy 58

The text of this policy should make clear the benefits and encouragement afforded to the use of natural flood management schemes.

Policy 59

The text of this policy should make clear the benefits and encouragement afforded to the use of ecosystem services to achieve a 'low carbon borough'.

Policy 60

As with all other developments, there will be an expectation for the proposals to achieve a net gain in biodiversity as evidenced by DERFRA metrics. Detailed ecological surveys must also be undertaken, in particular with reference to likely impacts upon flight paths for species such as birds and bats.

Policy 64

Mineral sites are often of little value as farmland when restored back to arable land; however can provide a diverse range of notable and rare habitats within the landscape due to the nature of the works undertaken. There are therefore great opportunities to enhance the local ecological value by restoring these sites to achieve a net gain in biodiversity through the creation, protection and enhancement of habitats (such as wetlands or notable grassland). The sites often offer suitable access to nature sites.

New Sites for Housing, Employment and Minerals

Q5 Do you agree with our selection of potential Site Allocations?

There are a number of site allocations which we object to on the basis of overlaps of the sites boundaries within sites designated for nature conservation. These are listed below. Please note those sites shown as having planning permission, or highlighted as rejected sites, have not all been included at this stage although issues may still be present. Any previous comments made on the sites independent of this consultation must still be considered to be valid.

Map 7: Lakeside & Woodfield

Housing Allocation 836: The site lies within close Proximity to Potteric Carr SSSI and Local Nature Reserve, the increase of housing and transport within this area is likely to have significant impacts upon nitrogen deposition for the local area which has been noted to significantly influence the plant communities present at the SSSI site. Allocation of this site is also likely to influence the functionality of the SSSI site for bird populations. As detailed above (Q5), there is a requirement for buffers to protect the functionality of notable sites (high tide roosts for notable bird species in flood events). Furthermore, the allocation encompasses/lie immediately adjacent to and thus likely to have significant impacts upon St Catherines Railway Embankment, Delves and Cuttings LWS; Littlewoods Plantation LWS.

Auckley-Hayfield Green

Housing Allocation 940: This site encompasses and will have significant impacts upon a number of LWS through habitat destruction, fragmentation and isolation. Furthermore, any habitat retention which can be obtained will likely still be highly effected by factors such as fragmentation and nitrogen deposition due to the increase of transport within this area. These sites include:

• Finningley Big Wood and Gravel Pits LWS

- Hurts Wood LWS
- Hammonds Elders LWS
- Tinkers Pond LWS

In addition the site lies immediately adjacent to and is likely to impact upon:

- Hurst Plantation, Savage Brooks and Marr Flatts Wood LWS
- Rossington Hall Grounds LWS
- Rossington Hall Brickponds and Plantations LWS
- Whinney Lane Plantation LWS
- Gravel Pit Plantation, Lake and Gypsy Plantation LWS
- Parkland Plantations cLWS

Conisborough

Housing Allocation 383: This site encompasses North Cliff LWS.

Employment Allocations 734, 817: These sites encompass Warmsworth Plantation cLWS and lie immediately adjacent to Edlington Pit Wood cLWS.

Impacts for all sites are likely to remove notable habitats and connective corridors.

Thorne

Employment Allocation 418: This site encompasses Hopyard Hay Meadow LWS, Thorne Ashfields LWS (including Poltontoft LWS) and lies adjacent to Thorne Watersides, Oxbows and Ings LWS. Any development within this area is likely to result in significant impacts to the designated sites, in particular due to the proximity to open water.

Amthorpe

Employment Allocations 227, 745: These sites encompass and would have significant impacts through loss of habitat, isolation and fragmentation upon New Close Wood LWS

Rossington

Employment Allocation 747 and Employment Potential Site 159: The allocation of these sites would remove habitat which is functionality linked to Potteric Carr SSSI and have previously been utilised as high tide roosting locations for a number of notable species during flood events. The removal of this habitat would have a potentially significant impact upon the species for which the site is designated. These sites encompass and would have significant impacts through loss of habitat, isolation and fragmentation upon Holme Plantation LWS and Wadworth Carr Railway Sidings LWS.

Kirk Sandall:

Employment Allocation 984: this site encompasses part of Wheatley Park and Old Don Oxbows LWS and will potentially have significant impacts through habitat loss and fragmentation.

Mineral Sites:

035, 1011: These sites encompass, or lie immediately adjacent to a number of LWS including Pickle Hill, Pickle Wood, Ash Holt, Blaxton Common and Finningley Gravel Pit.

Further additional sites are considered in Q7 which are also likely to impact upon sites designated for nature conservation in the absence of precautions or mitigation.

Q6	Are there any potential Site Allocations that you think we have missed?
Q7	Do you have any comments on individual sites as shown in the following location maps and schedule of sites? (Please quote reference number(s) when commenting).
	The following sites proposed for allocation lie either adjacent to or within a LWS, YWT Living Landscape corridor (an area identified by the Trust as important for wildlife and with the potential to be enhanced for biodiversity) or other designated site and as such must not impact upon the site but retain a suitable buffer in order to retain the ecological functionality and achieve an ecologically coherent network across Doncaster, as is included within the local policies and NPPF. Please note those sites shown as having planning permission, or highlighted as rejected sites, have not all been included at this stage although issues may still be present. Any previous comments made on the sites independent of this consultation must still be considered to be valid.

Allocation proposals should remove any overlap with these sites and distance the allocations as far away as possible. Those identified as taking designated land have been objected to at this stage due to the potential significant impacts development is likely to have. Those sites adjacent to designations, should they remain within allocations, must retain a buffer which incorporates sensitive landscaping plans to support the designation and connect it to other suitable habitats where possible. In accordance with NPPF, the proposals should provide a net gain in biodiversity; we would recommended that this is evidenced through the use of DEFRA metrics.

Plans should provide a sufficient buffer (minimum 10m) to protect the site from disturbance and lighting (shown through sensitive lighting plans). Sensitive sites should have a substantially larger buffer in order to protect it, for example those which rely upon functionally linked land. These should be advised upon by the production of a suitable standard ecological report prepared by a professional ecologist. Development should be phased, where appropriate, in order to maintain the functionality of the designation and ensure minimal impact during and post development.

The list below demonstrates those sites which we would like to see removed from the proximity of designations, or alternatively to incorporate suitable level of precautionary measures (as above) to protect the site and its connectivity during and post development. Please note as thorough ecological assessments have not been conducted or provided for the sites at this time, this list is not exhaustive and other notable areas for nature conservation may become apparent during the policy development and submission of

applications. YWT reserves the right to comment and object on any allocation or application submitted in the future.

Wheatley Hills and Intake

Housing Allocations 391, 432: Adjacent to Wheatley Golf Course LWS, Shaw Lane Hedgerows LWS

Housing Allocations 350, 407: Adjacent to Redhouse Plantation LWS, Doncaster Common LWS

Kirk Sandall and Edenthorpe Housing Allocation 309: Adjacent to Wyndthorpe Hall LWS

Bessacar and Cantley

Housing Allocations 164, 430: Within YWT Living Landscapes, adjacent to Black Carr Plantation LWS and Cantley Hall Park LWS

Lakeside and Woodfield

Housing Allocations 261, 262: Adjacent to Potteric Carr SSSI and Local Nature Reserve, Lakeside cLWS

OBJECTION: Housing Allocation 836: Adjacent to Potteric Carr SSSI and Local Nature Reserve, St Catherines Railway Embankment, Delves and Cuttings LWS; Littlewoods Plantation LWS and Carr Lodge Plantation LWS, Littlewoods Plantation LWS and Carr Lodge Plantation LWS

Bauby and Warmsworth

Housing Allocation 115: Adjacent to St Catherines Railway LWS and St Catherines Plantation LWS. There would be potential for these LWS to be connected through the provision of an ecologically coherent corridor through the site should it not be removed from allocation

Housing Allocation 148: Adjacent to St Catherines Railway LWS

Richmond Hill, Balby and Hexthorpe

Housing Allocation 929: Adjacent to Scabba Wood LWS

Scawsby and Scawthorpe

Housing Allocation 234, 389: Adjacent to Roman Ridge North and South LWS

Conisborough

OBJECTION: Housing Allocation 383: This site encompasses North Cliff LWS. **OBJECTION: Employment Allocations 734, 817:** These sites encompass Warmsworth Plantation cLWS and lie immediately adjacent to Edlington Pit Wood cLWS. Impacts for all sites are likely to remove notable habitats and connective corridors.

Mexborough

Housing Allocation 155: Within YWT Living Landscapes and adjacent to a watercourse

Thorne

Housing Allocation 510: Adjacent to a railway line with potential to connect site to Thorne Railway Kirton Lane Area cLWS

Housing Allocation 396: Adjacent to Thorne Railway LWS

OBJECTION: Employment Allocation 418: encompasses Hopyard Hay Meadow LWS, Thorne Ashfields LWS (including Poltontoft LWS) and lies adjacent to Thorne Watersides, Oxbows and Ings LWS

Askern

Housing Allocations 041, 374: Within YWT Living Landscapes

Auckley – Hayfield Green

OBJECTION: Housing Allocation 940, Employment Allocation 222, 941, 517, 753, 748: This site lies within YWT Living Landscapes and encompasses a number of LWS including:

- Finningley Big Wood and Gravel Pits LWS
- Hurts Wood LWS
- Hammonds Elders LWS
- Tinkers Pond LWS

In addition the site lies immediately adjacent to and is likely to impact upon:

- Hurst Plantation, Savage Brooks and Marr Flatts Wood LWS
- Rossington Hall Grounds LWS
- Rossington Hall Brickponds and Plantations LWS
- Whinney Lane Plantation LWS
- Gravel Pit Plantation, Lake and Gypsy Plantation LWS
- Parkland Plantations cLWS

Employment Allocations 518, 942: adjacent to Crow Wood, Great Wood and Spen Close Plantation LWS

Barnby Dun

Housing Allocation 147: Adjacent to Barnby Dun Station LWS with potential to connect to The Haggs cLWS

Bawtry

Housing Allocation 141: within YWT Living Landscapes and adjacent to Bawtry Hall Park and Lake LWS

Skellow

Housing Allocations 186, 165: adjacent to Skelbrooke Rein and Harry Wood LWS

Spotborough

Housing Allocation 929: Adjacent to Scabba Wood LWS

Ardwick-le-Street

Employment Allocations 515, 516: adjacent to Roman Ridge LWS Employment Allocation 461: adjacent to Size Ings cLWS Employment Allocation 462: adjacent Ardwick-le-Street Sweage Works LWs Employment Allocation 44: adjacent to Duck Holt LWS

Amthorpe

OBJECTION: Employment Allocations 227, 745: encompasses New Close Wood LWS Employment Allocations 932, 933, 934: adjacent to Hatfield Lings LWS Employment Allocations 937: adjacent to Holme Wood cLWS

Doncaster

Employment Allocation 767: in close proximity to Potteric Carr SSSI and adjacent to Decoy Bank Area LWS **Employment Allocations 259, 260:** Within close proximity to Potteric Carr SSSI **Employment Allocation 258:** adjacent to Lakeside cLWS

Rossington OBJECTION Employment Allocation 747: allocation lies immediately adjacent to Potteric Carr SSSI in close proximity to Holmes Carr LWS. Further development in this area is likely to impact upon the functionality of Potteric Carr SSSI. OBJECTION: Employment Allocation 159: encompasses Reedy Holme Plantation LWS and Wadworth Carr Railway Sidings cLWS	
Kirk Sandall OBJECTION: Employment Allocation 984: site encompasses part of Wheatley Park and Old Don Oxbows LWS Employment Allocation 183: adjacent to Wheatley Park and Old Don Oxbows LWS	
Mineral Sites: OBJECTION: 035, 1011: these sites encompass, or lie immediately adjacent to a number of LWS including Pickle Hill, Pickle Wood, Ash Holt, Blaxton Common and Finningley Gravel Pit.	

Q 8	Do you agree with the proposed boundary of the Site?
	As above, there are a number of sites which we would like to see the boundary changed to ensure the allocation does not result in a loss of (part of) a site designated for nature conservation. These include:
	Employment Allocations: 159, 222, 227, 418, 517, 734, 745, 747, 748, 753, 817, 941, 984 Housing Allocation: 383, 836 and 940 Mineral Sites: 035 and 1011
	In addition, we would ideally like to see the amendment of boundaries of sites listed in Q7 to avoid proximity to sites designated for nature conservation. Where this is not possible, precautions must be put in place to ensure compliance with national legislation and protection of the sites.
	Please note those sites shown as having planning permission, or highlighted as rejected sites, have not all been included at this stage although issues may still be present.

Q 9	Do you agree with the identified proposed use(s) on the Site?

Q10 Are there any special local issues or problems that could affect future development of the site that should be identified?

All sites designated for nature conservation should be protected from development. Any site which developed mitigation, compensation or enhancement due to habitat loss must also be protected from future development.

Q11 Are there any restrictions that should be put on future development of the site, for example, in terms of use or buildings?

Those sites identified within close proximity to a site designated for nature conservation must undertake an ecological survey conducted by a professional ecologist. This survey will advise on notable areas on site which should be retained and enhanced. Development proposals should be designed with this in mind, creating sensitive landscape schemes which enhance the biodiversity of the site and aid to create an ecologically coherent network across the local landscape. This is in accordance with NPPF. DEFRA metrics should be utilised to show a net gain in biodiversity on site. Any buffers or habitat created for mitigation must be adequately managed in the long term and protected from future development pressures and disturbance (e.g. from public usage, lighting).

Development should be phased, where necessary in order to minimise the impact upon any local species or habitats.

As thorough ecological assessments have not been conducted or provided for the sites at this time, further precautions and restrictions may become apparent depending on the presence of habitats and protected species. YWT reserves the right to comment and object on any allocation or application submitted in the future and to make suitable recommendations to protect biodiversity.

Q12	Are there any conditions that should be met before development of the Site?
	Ecological surveys (including all necessary protected species or habitat surveys) are a material consideration and must be undertaken for all sites prior to the commencement of any works (including site clearance) and appropriate mitigation developed prior to the loss of any habitat on site.
	This is site specific and must be dealt with on an individual site basis.

Evidence Base

Development Limits – Identification Methodology

 13 Do you agree with the proposed methodology?	Q13

Economic Forecasts & Housing Needs Assessment

Q14	Do you have any comments on the Report?

Employment Land Needs Assessment

Q15	Do you have any comments on the Assessment?

Green Belt Review

Γ

Q16	Do you agree with the Green Belt Review methodology and results? (Please quote reference number(s) if commenting on individual sites).
	We would encourage the retention and extension of green belt areas with policies incorporated to support its enhancement to achieve an ecologically coherent network across Doncaster.

Local Green Space Selection Methodology

Q17	Do you agree with the Methodology and proposed sites?

Housing and Economic Land Availability Assessment (HELAA)

Q18 Do you have any comments on the HELAA?

Infrastructure Plan

Q19	Do you have any comments on the Infrastructure Plan?

Local Plan Viability Testing

Q20	Do you have any comments on the Local Plan Viability Testing Report?

Q21	Do you have any comments on the Minerals requirements evidence?

Settlement Background Paper

Q22	Is the proposed spatial strategy sufficiently clear and coherently explained?

Q23	Do you agree that we should use the figure of 407 hectares for the amount of employment land rather than the 2015 figure which was 474 hectares?

Q24	Do you agree with the proposed means of deciding broadly where new housing and employment sites should be located?

Do you have any alternative proposals for how housing and employment sites could be distributed?

Q26	Do you agree with the approach to retail provision?

Q27	Are you satisfied that this approach will see the borough grow in the correct way over the plan period?

Do you agree with the revised approach to Defined Villages?

Wind Energy Development Background Paper

Q29	Do you agree that areas of search within which sites may be potentially suitable for wind energy development should be identified within Doncaster

Q30	Do you have any views on the methodology identified for establishing areas of search within which sites may be potentially suitable for wind energy development?

Do you have any views on the proposed area of search for wind energy

Q31

developments? The area of search covers a corridor which comprises a significant number of sites of interest to local biodiversity. This includes over 30 local wildlife sites which are primarily designated for the presence of notable grassland, woodland, standing water, fen and mire. Consideration therefore needs to be given to the adherence of the area of search with other local policies and the retention of an ecologically coherent network across Doncaster. As detailed above (Q5) and within Policy 31, development will only be permitted where it impacts on local wildlife sites when: 1. the mitigation hierarchy is applied so that firstly harm is avoided wherever possible, then appropriate mitigation is provided to lessen the impact of any unavoidable harm, and as a last resort compensation is delivered to offset any residual damage to biodiversity: 2. they use a biodiversity offsetting metric to demonstrate that a proposal will deliver a net gain for biodiversity; 3. they protect, restore, enhance and provide appropriate buffers around wildlife and geological features; 4. they produce and deliver appropriate long term management plans for local wildlife and geological sites as well as newly created or restored habitats; and; 5. they can demonstrate that the need for a proposal outweighs the value of any features to be lost. Local wildlife sites within the area of search include: Bentley Common, Arksey Ings, Bentley Bank, Pilkingtons Bungy Banks, Long Sandall Ings, Bentley Tilts and Course of Old EA Beck, Thorpe In Balne/Kirk Bramwith Area, Wrancarr Drain and Braithwate Delves, Thorpe Marsh Area, Barnby Dun Old Don Oxbow, Old Ings and Chequer Lane and West Ings; among others.

Q32	Do you have any comments on the draft Wind Energy developments policy (Policy 60)?
	E could go further to ensure there is no net loss of biodiversity, but to ensure a net gain and retention/enhancement of ecological networks, as in accordance with other policies and NPPF.

Sustainability Appraisal

Q33	Do you have any comments on the Sustainability Appraisal?

Privacy Notice

The Council is committed to meeting its data protection obligations and handling your information securely. You should make sure you read and understand the Planning Services privacy notice, which sets out what you need to know about how Doncaster Council will use your information in the course of our work as a Local Planning Authority.

http://www.doncaster.gov.uk/services/the-council-democracy/planning-service-privacy-notice

The Council reserves the right not to publish or take into account any representations which are openly offensive or defamatory.