This statement relates specifically to Inspector’s Question 1.11: *Is the Plan consistent with national planning policy relating to the mitigation of, adaptation to, climate change?*

1.1 In CPRE’s view, the Plan is neither consistent with national policy, nor legally compliant, with specific regard to the Climate Act 2008 as amended by Statutory Instrument 1056, and NPPF2019 Para 148.

1.2 CPRE’s position is that all Local Plans must embed a comprehensive, net-gain approach to addressing the climate, ecological and resilience challenges facing us all. Specifically, we contend that Plans should set out a high-level, strategic commitment, that all new development (residential/commercial/mixed-use) should provide five key outcomes:
- net zero/negative carbon;
- net gain for biodiversity;
- net gain for walking and cycling as modal share;
- net improvement to flood risk;
- net gain for access to green/open space.

1.3 NPPF2019 para 148 states that the planning system should “help to shape places in ways that contribute to radical reductions in greenhouse gas emissions..” The crucial phrase here is ‘shaping places’, because this highlights the need for the interventions to be spatial and designed to transform the pattern of development and movement within Doncaster Borough to make it better equipped for a low-carbon future. Since shaping places is what a Local Plan sets out to do, then compliance with NPPF requires that it *should* act, and it must do so measurably.

1.4 The Plan does not do this at present. Its place-shaping policies instead reinforce the tendency of development in the Borough – especially employment development – to become more dispersed, lower density and more dependent on carbon intensive activities, namely new and existing roads, and the airport.

1.5 The TCPA & RTPI document *Planning for Climate Change* (2018) (para 2.2.1) sets out the legal position succinctly, as referenced in our representations:

“Local planning authorities are bound by the legal duty set out in Section 19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, to ensure that, taken as whole, plan policy contributes to the mitigation of, and adaptation to, climate change. This powerful outcome-focused duty on local planning clearly signals the priority to be given to climate change in plan-making. In discharging this duty, local authorities should consider paragraph 94 of the NPPF [note this refers to NPPF2012, para 94 being equivalent to NPPF2019 para 148] and ensure that policies and decisions are in line with the objectives and provisions of the Climate Change Act 2008 (Section 1) (discussed below) and support the National Adaptation Programme. For the sake of clarity, this means that local plans should
be able to demonstrate how policy contributes to the Climate Change Act target regime, and this, in turn, means understanding both the baseline carbon dioxide emissions and then the actions needed to reduce emissions over time – which, in turn, means that annual monitoring reports should contain ongoing assessments of carbon performance against the Climate Change Act target.’’

1.6 Any reasonable interpretation of this combination of legal and policy requirements would lead to a Local Plan that, as a minimum, committed to:

- Commitment to a quantified carbon reduction target for the Borough;
- A high-level strategic policy outlining how the Plan will contribute to delivering that target;
- Suitable monitoring arrangements.

1.7 These minimum provisions are all conspicuously absent from the Doncaster Plan.

1.8 It is worth emphasising that these minimum requirements are not only CPRE’s interpretation, and are supported across the highest level of the planning profession. TCPA, RTPI and ClientEarth together produced a Law and Policy Briefing in September 2019 (appended to this statement), which states:

“Plan policies must be ‘designed to secure’ the outcomes in question, which requires a number things in practice. In respect of emissions (‘mitigation’), these include:

- A robust assessment of the potential for local policy to achieve local emissions reductions over the plan period, taking into account the UK’s net zero commitment under the Climate Change Act;
- A local target set in accordance with that potential;
- An assessment of proposed policies’ consistency with that target; and
- A monitoring framework using relevant indicators to track the performance of adopted policies…’’


1.9 It is alarming that there is not even a strategic policy for climate change. There is plenty of precedent for such policies in Local Plans: for example the adopted Bradford Core Strategy has a commendable one, as the second strategic policy in the whole Plan (Policy SC2) and the partial review of that strategy further strengthens it (section 3.8 of this linked document is appended to this statement):

1.10 One specific modification to the Bradford Core Strategy SC2 (part 7) in the partial review is as follows: “Reduce emissions and improve air quality by working with partners to make walking, cycling and the use of public transport a first choice for all, as well as ensuring that road transport emissions reductions are integrated into decision-making. Requiring new development to be located and/or position in sustainable, well-connection locations in a way that minimises emissions as well as limits its occupants’ exposure to poor air quality.”

1.11 Such a policy may be challenging, but it is nevertheless a necessary policy for both climate response and public health. There is no credible reason for Doncaster not to make high-level commitments of this kind.

1.12 We note from Topic Paper 1 that Doncaster’s Climate Emergency declaration was made since the submission of the draft Local Plan. This raises an obvious question as to whether the Council envisages modifications to the Plan in light of its recognition of the imperative for climate response. For example, Calderdale Council has inserted a 60% carbon reduction target commitment as a modification its Submission Draft Local Plan, following the declaration of a Climate Emergency (relevant page appended to this statement) https://www.calderdale.gov.uk/v2/sites/default/files/CC57-List-of-Proposed-Modifications.pdf

1.13 Topic Paper 1 makes a huge and startling omission in relation to the potential of the Local Plan to shape places for climate response: it offers no analysis of the spatial strategy. The key issues we have consistently identified with Doncaster’s spatial strategy, regarding climate impact, are as follows:

- An economic growth strategy that is very heavily skewed towards logistics and distribution, meaning large volumes of road traffic;
- An employment land strategy that is explicitly linked to peripheral, motorway-junction sites with negligible opportunity for employees to access new jobs by means other than private car;
- A heavy reliance on the airport both as a source of economic growth and as a strategic development location.

1.14 The matrix appended to Topic Paper 1 makes a frankly derisory assessment of the Plan’s consistency with NPPF para 148. It acknowledges the important roles of green infrastructure, ecological networks etc, but totally ignores the key place-shaping policies of spatial strategy, settlement hierarchy and location of development.

1.15 No evidence is provided to show that development aspirations for Doncaster based on alternative, less transport-intensive spatial options have been evaluated. In this context it is also important to note that nationwide reductions in transport emissions, arising from take-up of ultra-low-emission vehicles, will deliver the majority of their carbon impact beyond the
plan period, and do not in any case qualify as plan-related – ie spatial – mitigation measures. Any meaningful transport emission reductions achieved within the plan period can only arise from reductions in car traffic and take-up of walking and cycling.

1.16 Sheffield City Region’s Draft Energy Strategy includes, amongst other goals to achieve net zero by 2040:

- a transport goal of 10% reduction in car miles by 2030, rising to a 25% reduction by 2040;

- a built environment goal for all new homes to be built close to PassivHaus standard from 2030.


1.17 It is inexplicable and inexcusable that the Local Plan makes no attempt to support these goals, and proposes a spatial strategy that is explicitly, unashamedly road-infrastructure orientated.

1.18 Whilst it just might be technically possible to implement the proposed spatial strategy whilst also meeting a high-level carbon reduction target, there are three fundamental flaws in the Plan that rule out that possibility:

- No carbon reduction target commitment against which to measure implementation;
- No recognition in the Plan of the carbon implications of the spatial strategy;
- No high-level policy in the Plan that specifically seek to address these implications.

1.19 In conclusion, no carbon reduction target is put forward, no attempt has been evidenced to shape places to achieve radical reductions in emissions, and there is no demonstration that spatial strategy is informed by any ambition to mitigate climate change. Therefore, the draft Plan is at odds with the Climate Change Act and inconsistent with NPPF2019 para 148.