1. **Question 13.2**

1.1 In our original representation we proposed that policies 30 and 31 should be combined into one coherent policy in order to reinforce that key sites and habitats are seen within the wider context of an ecological network that links the rare and the common. We maintain that stance. We believed that Policy 31 is weak and did not comply with NPPF paras 175-176.

1.2 13.2 a). Policy 30 is consistent with national policy. NPPF 170 d) requires planning policies to contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. The Government’s 25 Year Environment Plan, 2018, embeds an ‘environmental net gain’ principle for development, including housing and infrastructure. This is likely to become mandatory as the Environment Bill contains a commitment to net gain for biodiversity which has been specified as 10% in Schedule 14 of the Bill as of March 2020.

1.3 How net gain is applied will be crucial to its effectiveness in enhancing biodiversity. A full understanding of the biodiversity value of the site, an up to date and comprehensive biodiversity gain site register, the design of the development, strong standards for green infrastructure, appropriate tools and guidance, and developer contributions are all essential to realise environmental improvements through net gain and create more sustainable places in which to live and work.

1.4 13.2 b) NPPF para 175 contains the mitigation hierarchy to prevent harm to biodiversity. ‘If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;’ Policy 31A) 1, as written, makes the mitigation hierarchy into a process to be applied by the developer after which proposals would be supported whatever the outcome, not a process that limits harm. The changes to para 10.40 clarify what the policy intends but do not make the plan sound as it is the policy itself that is the legal entity.

1.5 13.2c) DMBC has produced a comprehensive biodiversity map but no reference to this is made within the Local Plan. As there is a limit to the information that the Policies Map can present, the biodiversity map should be referenced in the accompanying text.

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1 [https://www.doncaster.gov.uk/services/planning/local-wildlife-and-geological-sites](https://www.doncaster.gov.uk/services/planning/local-wildlife-and-geological-sites); [http://dmbc.maps.arcgis.com/apps/webappviewer/index.html?id=dca3a769db3d4e40b5f00f6cc40b2b9e](http://dmbc.maps.arcgis.com/apps/webappviewer/index.html?id=dca3a769db3d4e40b5f00f6cc40b2b9e)
1.6 13.2d) The proposed changes to Policy 31 C are ‘Proposals should seek to protect and enhance Sites of Special Scientific interest wherever possible and maintain, strengthen, and bridge gaps to link them to the wider ecological network wherever possible. This is welcome but it should also apply to all designated and non-designated sites to provide one coherent ecological network and to avoid sites becoming islands with little opportunity for species to seek more hospitable habitats.

1.7 The changes to para 10.40 do not make the plan sound as we have explained above.

2. Question 13.4

2.1 Our original representation proposed a revision of Policy 34 to take account of the European Landscape Convention\(^2\), to which Government committed in 2007, and to recognise landscape as the canvas on which people and place interact.

2.2 Whilst the Council’s proposed change in the paragraph before criterion F brings cumulative impact into the policy it does not address our other concerns which we believe made the plan unsound and inconsistent with national policy.

2.3 Q13.4 As written the policy requires proposals to ‘take account of… landscape character’ rather than to use it to shape design and reinforce the intrinsic character and beauty of landscapes, and the wider benefits from natural capital and ecosystem services. The policy has no sense of landscape scale be it small or large, and focuses sensitivity to change on distinctive landscapes (Thorne and Hatfield Moors are mentioned) when all landscapes are sensitive to change. The Doncaster Landscape Character Assessment is only mentioned in the text. As a key interpreter of how and where development should respond to the Natural Character Areas in the Borough it should be in the policy. Policy 34 proposes to mitigate for landscape loss off-site but this is not possible since landscape embodies the sense of place for those people who live in it.

2.4 Policy 34 is inconsistent with national policy as embodied in the ELC framework, NPPF and the 25yr Environment Plan. The ELC framework requires ‘all England’s diverse landscapes to be valued and well looked after,...all landscapes will be more effectively planned, well-designed and sensitively managed with people in mind.’ Landscape provides a framework for spatial integration and interaction of functions, such as climate regulation, management of flooding, recreation and sense of place, in a positive and planned way. It is the context and consequence for all decisions. Therefore in spatial planning a landscape policy should not be something ‘to be taken into account’ but should provide the integrating element for

environmental attributes such as biodiversity or cultural heritage and should recognise the ‘ordinary’, ‘everyday’ and even ‘degraded’ landscapes. It is these landscapes – suburban, peri-urban and urban areas - where the majority of people live and work, and they are often highly valued locally. The ELC recognises that landscape is part of everybody’s quality of life.

2.5 NPPF policies (20d, 127c, 149, 151, 170 a & b, 171) also seek to integrate landscape into strategic policies which are sympathetic to local character and history, including the built environment, and that take a proactive approach to mitigating and adapting to climate change. Cumulative landscape and visual impacts must be addressed. Planning policies should contribute to the intrinsic character and beauty of the countryside, and to the wider benefits from natural capital and ecosystem services by planning for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. All that is embodied in NPPF 148 occurs within a landscape or townscape. Topic Paper 1 Climate Change indicates the limited approach the plan has taken towards landscape’s role in climate mitigation and adaptation and natural capital enhancement, perceiving it to be mainly embodied in biodiversity.

2.6 The 25-yr environment plan had a whole chapter devoted to ‘Recovering nature and enhancing the beauty of landscapes ’ and promoted landscape scale attention when scoping a Nature Recovery Network or improving landscapes for people, places and nature.