



DATE 20/09/2022

BY EMAIL ONLY: tsi@doncaster.gov.uk

22/01710/4FULM (Erection of residential development and public open space with associated infrastructure, landscaping and drainage | Land North Of The Railway Line Rose Hill Rise Rose Hill Doncaster DN4 5LE

We OBJECT to the planning application due to insufficient ecological information to determine the application.

1. We have reviewed the ecological information submitted with the application. A Preliminary Ecological Appraisal Report (PEAR) has been submitted. This document recommended that protected species surveys were undertaken. The protected species survey requirements were considered to be required:
 - Seasonal bat activity
 - Breeding birds
 - Environmental DNA for great crested newt
 - Vegetation surveys (grasslands)
 - Reptile surveys
2. However, only bat, breeding bird and reptile surveys appear to have been completed. Further eDNA and vegetation surveys are therefore required, or detailed justification why they are not considered to be required must be provided. In line with case law (see [here](#)) and [ODPM circular 06/2005](#) (Para 99), the LPA has a duty to consider impacts upon protected species prior to determination. Only when all of the ecological information has been collected than the full impacts of the scheme be determined.
3. The protected species reports which have been submitted have been provided as stand-alone documents, rather than being considered together in an Ecological Impact Assessment (EclA), which assesses the specific impacts of the proposed scheme. The requirement for an EclA is detailed in the Conclusions and Recommendation table on Page 21/22 of the PEA.
4. The EclA should detail how the scheme designed has incorporated the recommendations of the PEA. This should include how habitat connectivity across the landscape has been incorporated, along with appropriate buffers for nearby sites of importance for nature





conservation, taking into consideration the significant number of protected wildlife sites in the local area.

5. In addition, the recently enacted Environment Act which, when fully implemented, will put a requirement for all proposals to achieve a 10% net gain in biodiversity. This level is already being implemented as good practice across the country and the application needs to demonstrate that the development can deliver Biodiversity Net Gain.
6. The requirement for planning applications to deliver a net gain in biodiversity is set out in the National Planning Policy Framework (NPPF – July 2021). Paragraph 174 d requires that planning decisions 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*'.
7. We would therefore wish to see the usage of a biodiversity metric to demonstrate how net gains for biodiversity can be achieved on site. We would welcome the implementation of Defra v3.1 metric as industry standard, with sufficient justification for habitat classifications and conditions, pre and post development made clear. The initial calculations provided within the PEA indicate significant biodiversity loss under the current proposal, which is not acceptable.
8. One of The Wildlife Trusts' strategic aims is to make it normal practice for all residential, commercial and infrastructure development to contribute positively to nature's recovery on land and at sea. Biodiversity Net Gain, implemented in the right way, is therefore an important mechanism to help achieve The Wildlife Trusts' ambition.

Should you need any further information, please feel free to contact us on the email below, or via our website www.ywt.org.uk.

Kind regards,

**The Planning Team
Yorkshire Wildlife Trust**

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