

Section 3c General

Id No Respondent

166 Banks Development Division

Section 3c General comments

Policy Omission: Clay Extraction

There is a pressing reason for a regional clay policy concerning common clay in the same way that there is a regional policy for aggregates provision. The Government has consulted on a draft annex to MPS1 which constitutes emerging national policy for clay. Background Paper 8 suggests that the lack of government policy justified the RSS approach of laissez faire. This argument has been completely overtaken by events and there is now no justification for placing clay as a lower priority than aggregates.

In the North East Region there is a special need for a clay policy. At present two county and ten unitary councils make local clay policies in an un-strategic vacuum. In the former county of Tyne & Wear there is not even a sub-regional strategy in place other than the Tyne & Wear Minerals Local Plan. This plan was adopted in late 1980s but is still a relevant consideration in drawing up local policies in the absence of anything more recent! This would not be a problem if there were no need for clay to cross council boundaries to supply existing factories. However, this is a particular problem at Throckley Brickworks in Newcastle City which is reliant upon Red Barns Quarry in South Tyneside. The quarry will need to be extended or replaced within the time frame of RSS.

40 Blyth Valley Council

Built environment, heritage and culture

The RSS contains a suite of policies aimed at protecting the natural environment, landscape and resources of the region and promoting renewable energy as an alternative to traditional energy sources.

The policies in this section are generally supported with no specific issues arising for Blyth Valley

Page 98 Support the Key environmental objectives

Page 101 Welcome the inclusion of the Ashington, Blyth and Tyne Line in the list of schemes, although the timescale for the delivery of the scheme appears to have been put back

409 Culture North East

View: Shaping The North East – Regional Spatial Strategy succeeds in recognising and prioritising the value of culture to the sustainable, spatial development of the region and the quality of life of its citizens. The identification of ‘conserving, enhancing and capitalising upon the region’s diverse natural and built environment, heritage and culture’ as one of four main themes is to be applauded.

This theme is treated in most detail in section 3C but it is most encouraging that the theme is also apparent throughout the document, rightly reflecting its cross-cutting nature.

There is one aspect of the importance of culture to the spatial development of North East England that could be emphasised even more – understanding of and respect for regional distinctiveness.

It is often said that regional distinctiveness is difficult to define but easy to lose. Parts of the country that have enjoyed more economic prosperity than this region have sometimes paid the price of losing their distinctiveness in characterless developments. Intelligent spatial development in North East England should embrace change and economic progress without compromising the authenticity or distinctiveness of our built and natural environment. It is important that North East England continues to look and feel different and distinct from other regions, as it is for those other regions too, our regional distinctiveness is an asset.

Another useful way of looking at regional distinctiveness is as a counterpart to bio-diversity, variation that is a good in itself.

Page 98 of the draft Regional Spatial Strategy identifies key objectives under theme 3C. The addition of an objective that refers specifically to

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		valuing development that reflects architectural and cultural authenticity and distinctiveness would further strengthen the Regional Spatial Strategy.
		Culture North East supports ‘View – Shaping The North East’ as a plan that recognises the significant role culture plays in regional, spatial development and looks forward to working closely with the North East Assembly on further development and implementation of the Regional Spatial Strategy.
202	Durham County Council	Key Objectives Para 3.86 should include a clause such as: "ensure that landscape character and local distinctiveness, biodiversity and geodiversity are conserved and enhanced, and, where appropriate, restored".
172	Durham Heritage Coast	Importantly we draw your attention to the inaccuracy of the position of the Durham Heritage Coast on the maps included on P101. The Countryside Agency can supply accurate maps of the defined area.
98	English Heritage	Para 3.82 Object Reference should be made overtly to the region's heritage and historic environment.
95	English Nature,	Para 3.86 Object - The Key objectives should make specific reference not only to World Heritage Sites, but to the whole range of heritage assets and elements of the historic environment. Para 3.86 Propose amend 6th bullet point to read: "ensure the decisions on proposed development affecting nationally and internationally designated sites and areas, such as National Parks, AONBs, World Heritage Sites, Ramsar Sites, Special Protection Areas, Special areas of Conservation and sites of Special Scientific Interest do not compromise their statutory purposes.
200	Environment Agency	Reason: impacts may not simply affect natural beauty of these sites or areas 3.82 We support this paragraph and are pleased that the RSS appreciates that the environment has a finite limit to development that it can sustainably support and states: “Economic and social development must take place within the framework of respecting regional and global environmental limits.” However, environmental policies in RSS say ‘should’. What is the value of this statement if the policy wording is weaker? 3.83 – 3.85 We strongly support this text, but as above, we are disappointed that policy backing is more limited. 3.84 We are pleased to see that water resources and minimisation of water consumption are included in climate change initiatives. We suggest “and to reduce levels of waste generated and deal with its disposal appropriately” be changed to: “and deal with the waste generated in accordance to the principles of the waste hierarchy”. 3.85 Suggested change “Delivery of the region’s economic, regeneration and population aspirations is therefore only sustainable where conservation and enhancement are

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equal and integrated elements of the proposed use of the environment.”

3.86 – Key Objectives

We generally support the key objectives, although we have some detailed suggestions below that will enhance their effectiveness:

1st bullet - pleased to see the top bullet refers to the assessment for positive and negative impacts on the environment.

2nd and 12th objectives are nearly the same – they could be integrated as follows: “promote (high quality) sustainable design and construction techniques for all developments and redevelopments”.

4th bullet -“ensure that development does not cause significant environmental harm.” - How is significant defined? By EIA/SEA or something else?

5th bullet – suggested rewording “...ensure that the region optimises the broad range of benefits presented by a quality, accessible environment, without leading to their deterioration”

7th bullet - suggested rewording - “measure and record the biodiversity heritage of the Region to ensure effective management decisions on enhancing and protecting the natural resource”

There should be a further bullet on ‘future proofing’ for new legislation that will be implemented during the plan period.

MAPS: ENVIRONMENT 1 & 2

Fully support the inclusion of these maps. We are, however, puzzled by inclusion of the ‘Magnesian Limestone Core Zone’ on Map 1 when there is no reference to it elsewhere in the RSS

Between Policy 45 and 3.152

There needs to be reference to the potential for mine water breakout in the region

163 Friends of the Earth North East

Friends of the Earth strongly supports paragraphs 3.82-3.85, and in particular, the following statements:

‘The natural environment is the support system within which all life exists. Its resources, such as air, water, land and soil, have a limit to the amount of activity they can support. Breaching these limits will lead to a reduction in quality of life, particularly for future generations. Economic and social development must take place within the framework of respecting regional and global environmental limits.’ (paragraph 3.82)

This supports our comments on airports (policy 21), connectivity and accessibility (policy 11), chemical and steel industries (policy 23), the need for a stronger sustainable development policy, and for new policies on climate change and sustainable consumption and construction.

‘A high-quality, attractive natural and built environment is important to people’s quality of life and sense of well-being...Some parts of the region suffer from poor environmental quality, often as a result of former industrial activity and associated dereliction. The right of everyone

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to live in a clean, healthy, attractive environment is a central principle of the RSS.’ (paragraph 3.83)

This supports our comments on the need for a stronger sustainable development policy and for a revised policy 23 on the chemical and steel industries.

‘Moving towards a sustainable future will involve a range of actions to mitigate greenhouse gas emissions, meeting national and international objectives, and adapting to climate change impacts. There is a need to change attitudes and behaviours to energy use; to move people and goods in ways which minimise emissions; to reduce energy consumption; to generate energy from renewable resources; to minimise water consumption....’ (paragraph 3.84)

This supports our comments on the need for a climate change policy.

‘Delivery of the region’s economic, regeneration and population aspirations is therefore only sustainable where conservation and enhancement are equal elements of the proposed use of the environment.’ (paragraph 3.85)

This supports our call for a stronger sustainable development policy, as well as our comments on prestige employment and reserve sites, city regions, airports and connectivity/accessibility.

In the interests of sustainable development, we strongly recommend that these paragraphs be retained, and that elements of the RSS (such as those outlined above) which are inconsistent with these statements are amended accordingly.

Para 3.86

Friends of the Earth strongly objects to the fourth bullet point in the ‘Key Objectives’ which says, ‘ensure that development does not cause significant environmental harm.’ We request that the word, ‘significant’ is removed so that the statement is unambiguous and consistent with sustainable development (which requires integration not trading-off of environmental, economic and social objectives

329 Friends of the Earth South Tyneside

3.82-3.85 South Tyneside Friends of the Earth strongly supports paragraphs 3.82-3.85, and in particular, the following statements:

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‘A high-quality, attractive natural and built environment is important to people’s quality of life and sense of wellbeing... Some parts of the region suffer from poor environmental quality, often as a result of former industrial activity and associated dereliction. The right of everyone to live in a clean, healthy, attractive environment is a central principle of the RSS.’ (paragraph 3.83)

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Key Objectives South Tyneside Friends of the Earth strongly objects to the fourth bullet point in the 'Key Objectives' which says, 'ensure that development does not cause significant environmental harm.' We request that the word, 'significant' is removed so that the statement is unambiguous and consistent with sustainable development (which requires integration not trading-off of environmental, economic and social objectives).

453 Member of Public

Para 3.86

object to fourth bullet point in key objectives. The word "significant" is open to interpretation and should be removed

273 Member of Public

TECHNICAL PAPER EIGHT

I originally came across this document whilst researching background material for a project and was informed by a Mineral Planner they had not seen it so the question of full consultation over the RSS I am concerned with. I am delighted to see reference to the National Policy context that MPG3 sets out a presumption against development for coal and that of the six tests one also covers the green belt. In view of the applications now made by opencast operators and the put cry over these it is essential the RSS restates this and supports this established policy, not devolve it to the local councils who the have to take on public enquiry after public enquiry due to the huge financial gain these operators can make. You mention supply and demand for coal and give Alcan Power Station mention as a main market for coal. I am uneasy about this as it gives some justification for mining to continue without the counter argument of environmental degradation and sustainability being stated. It is unclear from the technical report what volume of coal Fox Covert will produce and why in a technical paper we see words like UK Coal and H J Banks would like to see continuity of supply. Is that not a matter for the Planning Bodies and the democratic process to determine, not a vested commercial interest to have in a public document? The coal section also does not restate the opencast coal constraint areas in the approved Minerals Plan and this should be so. It seems to give on balance more credence to the mining operators than the reasons why the presumption against developments to continue. These may be mere words but the commercial interests will drive a coach and horses through the policy given any indication of relaxation. Finally the coal section talks about rail transport and the operators even have the audacity to say rail link can only be justified if they get a grant. Why should the taxpayer support such commercial vested interest that pays no real heed to sustainability? The comments that there is no policy in RPG1 for brick making minerals further alarms me that this "demand" for material is inherent in the justification for opencast but it appears the volume available exceeds demand anyway. So should this point not be made in the RSS and that there is no requirement for the planning authority thus to make allocation. Indeed with the shift in construction process the demand for bricks may well continue to decline as we move to more sustainable and more fabricated forms of construction which is not even touched upon in the paper. Finally your opt out of using the RSS to cover Minerals is awful and if the RSS is to be the high level strategy it needs to be saying what Minerals have to do. Not delegating that entire role to others.

449 National Trust North East

Para 3.84

The National Trust supports the recognition of the importance of climate change and its impacts on the region in this paragraph. However, it needs to be substantiated through a specific policy on Climate Change, as stated in previous representations on this matter.

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The Trust would like to see the word “uncertain” deleted and replaced with “certain” in the first line of paragraph 3.84. The risks are clear, and are being felt now. There is no uncertainty about it. Also delete “potential” from the third sentence. The threats are real, and are happening now. The Trust has experience of this which it is happy to share with the Assembly. The Trust recently produced a report on Climate Change, and the impacts that are being felt already all over the country at various properties, through flooding, sea level rise, changes in growing seasons, changes to habitats and species, etc.

The paragraph states: “Moving towards a sustainable future will involve a range of actions to mitigate greenhouse gas emissions, meeting national and international objectives, and adapting to climate change impacts.”

Unless this statement is made into Policy within the RSS, it is meaningless, and merely rhetorical. If the RSS really wants to implement Objective 7 of the IRF, it needs to have a specific policy on climate change. A suggested policy wording has been included in an earlier statement by the NT at the beginning of the RSS.

Para 3.86

The Trust strongly supports the list of objectives shown in paragraph 3.86. However, these objectives should ALL be reflected in the various policy areas, and unfortunately they are not. Again, unless these are translated into policy, they remain nothing but supporting text within the RSS.

There therefore need to be separate policies on Climate Change, Air Quality, and Soil Protection contained within the RSS.

The fourth bullet point should delete the word “significant”. The word is too vague, and implies that certain levels of environmental damage are acceptable, but these levels are not defined.

341 Newcastle City Council

The Council strongly supports policy 39 and point (c) in policy 40. These policies and supporting text seek to improve energy efficiency and promote the use of renewable energy sources, especially in new development. They back up key elements of policy 2. The supporting text includes reference to Building in Sustainability: a Guide to Sustainable Construction and Development in the North East. This reference would have added strength if it was within a policy and the Council suggests this, preferably as part of a reconfigured policy or group of policies on sustainable development or construction, as suggested above at 2.2.

Draft RSS acknowledges the effects of CO2 production in terms of its impact on climate change and suggests ways in which it might be reduced in relation to ground based transport and to energy use within buildings. It does not deal with the contribution of air travel to carbon emissions, though it is mentioned in the sustainability appraisal report as an area that might benefit from further consideration. The City Council believes that this issue should have been dealt with in more depth and reference made to it in section or sections dealing with climate change.

Draft RSS refers only in passing to other forms of atmospheric emissions and to air quality issues. The Council believes that air quality issues will become increasingly important, especially in city centre locations, and that RSS should give more of a lead on this issue.

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256	North East Wildlife Trust	<p>North East Wildlife Trusts feel it is disappointing and a missed opportunity that the proposed landscape scale environmental and socio-economic opportunities across the region are not centrally a part of the RSS.</p> <p>The North East Wildlife Trusts wish to express their support for the developing concept of green infrastructure as the integral context for all major development in the region, ensuring biodiversity is promoted alongside development. Though in its formative stages, the concept of a City region Park linking landscape scale projects across the region, should be recognised in the RSS as this too might also have far reaching strategic biodiversity importance. However, the North East Wildlife Trusts would be concerned to be involved in the detailed development of green infrastructure proposals and in the design of any specific such schemes in order to optimise wildlife and biodiversity opportunities.</p> <p>- The diagram on page 8, figure 2 and the maps on pages 99 and 101 are misleading and incomplete/inaccurate in presenting biodiversity indicators. The strategy diagram should include the Regional Biodiversity Strategy specifically. The representation of biodiversity strategic opportunities as 'points' on the maps, though indicative only, will mislead potential developers and others into thinking these are the key sites or areas whereas in reality the Biodiversity Strategy is area wide in its character. We strongly recommend these be amended.</p> <p>- In making these comments the NEWT would like to formally register their continued willingness to work with the RSS authors to improve the representation of biodiversity in the document as a whole and in the specific ways highlighted.</p>
217	Northumberland & Newcastle Society	support key objectives
42	Redcar & Cleveland Borough Council	<p>Para 3.86 Themes 3B Sustainable Communities and 3C Environment should recognise the importance of promoting a high quality of design in all new development and this should be embedded into the RSS policies as well as the objectives. Well designed buildings, streetscapes and landscapes are vital in helping to create the new image the region will require if it is to succeed economically. Better designed buildings, landscapes and streetscapes will help in the programme of regeneration, building sustainable communities, social inclusion and environmental enhancement. The concept of high quality building and landscape designs should be embedded in policy as well as the subsidiary design principles of sustainable construction and designing out crime. The policy should be supported by the requirement to submit Design Statements with planning applications</p>
348	Royal Town Planning Institute	<p>Natural and Built Environment, Heritage and Culture Waste and minerals</p> <p>32. The Institute would argue that the Submission Draft does not satisfy the requirements of PPS 10 - there is insufficient guidance on sub-regional allocations, as required by the Government's PPS.</p> <p>Climate change</p> <p>33. We welcome the inclusion of references to climate change in the Submission Draft, though we note that these were introduced late in the process. We believe that climate change is still not adequately represented in the Submission Draft, and suggest that consideration of its implications should be more fundamental to the RSS as a whole. As the sustainability report indicates, there is an obvious tension between the economic growth aspirations of the RSS and the need to reduce greenhouse gas emissions significantly. The need to "decouple" economic growth and climate change is not a central policy principle of the Submission Draft.</p>

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34. In contrast, the Submission Draft is very positive about reducing energy use in development and construction, and very supportive of renewable energy. This is welcomed. The Institute believes some of the proposals – for example, introducing policies requiring 10% of energy use in buildings to be from embedded renewable sources – are challenging. It is essential that the clear requirement in the Submission Draft to cascade these provisions down to LDFs is maintained consistently, so as to provide a “level playing field” across the region.

Air quality and pollution to air

35. Air quality and pollution to air get very little mention in the Submission Draft, perhaps because the Assembly does not see any regionally specific issues to address. While the RSS should not simply repeat national policy for the sake of it, there are emerging problems of poor air quality, especially in the larger towns and city centres, and the RSS ought to give a clearer lead to local authorities in taking air quality seriously, both in planning policy and in development control.

Flooding

36. The Institute welcomes the comprehensive treatment of flooding in the Submission Draft, and is particularly supportive of the clear lead being given to the adoption of more sustainable forms of drainage and water management.

Open space

37. The Submission Draft deals effectively with strategic open space, but does not mention the need to protect and enhance “ordinary” open spaces in urban areas. These seem to have fallen into a gap between policies for green belt and open areas (Section 2) and those for protecting landscape character and trees, woodland and forests (Section 3C). The Institute recognises that there is recent national guidance, and that it might be difficult to demonstrate regional specificity on this issue, but most other forms of environmental asset do get a mention in the RSS, even if only fleetingly.

124 South Tyneside Council

Para 3.82 Should refer to Sustaine work on climate change: “And the Weather Today Is ..”

151 Sunderland ARC

Maps Page 99/101 One of the maps should show boundaries of the region’s 15 Countryside Character Areas

The key objectives set out in 3.86 are supported.

Although the title of the section is overarching and refers to the region’s Built Environment, there is no general policy designed to enhance the built environment outside special designations and historic areas. Sunderland arc considers that this should be addressed and recognition given to e.g. the role of appropriate infrastructure improvements in alleviating environmental degradation and improving environmental conditions for disadvantaged urban communities, as well as areas of historic interest.

Environment Diagrams (pp99/101)

The distinction/rationale between Environment 1 & 2 is not clear.

254 UK Coal Mining Ltd

Para 3.150 - Other Minerals - Fireclay

The support for the recovery of fireclay concurrent with surface coal mine sites is welcomed. However, taking into account guidance at paragraph 8 of MPG3 we suggest that the last sentence should be amended as follows:-

‘Therefore, where opencast coal working is environmentally acceptable or the local or community benefits outweigh the likely impacts, the concurrent extraction of marketable fireclay should be encouraged.’ (our inserted text is underlined).

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431 Woodland Trust

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The Woodland Trust supports the addition of areas of ancient woodland concentration to Environment Map 2. Ancient woodland is not only our richest habitat for wildlife but also irreplaceable as this habitat has evolved over centuries.

However the key for Environment Map 2 is inaccurate as it describes the areas of ancient woodland shown as simply 'Ancient Woodland'. The areas depicted are ancient woodland concentrations, as generated from our Space for Nature mapping work which was submitted to the Regional Assembly. Ancient woodland is distributed across the whole of the North East but the shaded areas on the map simply show the areas in where the concentration of ancient woodland is highest.

Recommendation:

Amend the key to Environment Map 2 to state 'Ancient Woodland Concentrations'

161 World Wild Life Fund UK

Under theme 3C WWF welcomes commitment that "Economic and social development must take place within framework of respecting regional and global environmental limits". However we would stress the need to use an aggregate indicator such as Ecological Footprint to ensure this is achieved.

The greatest environmental challenge facing English regions is over consumption and wasteful use of resources. Demand on natural resources exceeds the planet's capacity to provide. We have overshoot our global carrying capacity by 30% effectively destroying our life support system. Natural resources are often extracted in one country, transferred into products in another and consumed in a third. Thus significant proportion of the natural resource use that supports national and regional economic activity often takes place outside national borders. In UK this is around 50% - half the resources that drive our economy are extracted elsewhere on the planet. The impact of this is not accounted for. It is essential we develop and adopt indicators that quantify the global impacts of our economic activity.

WWF believe it is essential that the North East takes the wider global dimension into account to achieve progress towards sustainability.

We would like to see:

1. Commitment to adopt Ecological Footprint as a regional headline indicator for sustainable development
2. Stabilization of the regions Footprint by 2012 and reduction of Footprint thereafter

187 Yuill Homes

Theme 3c: Conserving, Enhancing and Capitalising upon the Region's Diverse Natural and Built Environment, Heritage and Culture
We would like to strongly reiterate and support all comments from the HBF with regards to the above sections of the document