

Policy 3

Id No Respondent

97 Alnwick District Council

Policy 3

The preamble to policy 3 defines "urban areas" as including only the 2rural service centres" in the rural areas of the region. On the basis of the sequential approach set out, greenfield land adjoining Alnwick town should be developed before Brownfield site in the centre of Rothbury. This is fundamentally unsustainable and runs contrary to PPG3.

The definition of "urban areas" must be wider.

177 Berwick-upon-Tweed Borough

The sequential approach to development as set out in Policy 3 uses the definition of urban areas as being conurbations, main towns, towns in regeneration areas and the rural services centres as identified in policies 5, 6, 7 and 8. For the Borough of Berwick -upon-Tweed the only settlement within this definition is the town of Beriwck. Whilst it is acknowledged that this policy applies to all development, if the development of housing is taken as an example, when applying the sequential approach of Policy 3 it could result in increased pressure for the development of peripheral greenfield sites adjoining Berwick ahead of available previously developed sites in other sustainable rural service centres within the Borough such as Belford, Seahouses and Wooler that have been identified through the Urban Capacity study. In accordance with paragraph 30 of PPG3. The policy advocates the use of other suitable sites within and adjoining the 'urban areas' before considering previously developed land and buildings in other settlements. The low housing allocation for the Borough detailed in Policy 30 is likely to render the need for additional land outwith the settlement of Beriwck to meet the housing allocation unnecessary if this if this sequential approach is applied. This would not fit with the approach proposed in Policy 8 and paragraph 2.148 under Rural Areas, "Local Development Frameworks should identify an appropriate settlement hierarchy, incorporating the secondary settlements and villages below main rural service centres, to determine where further smaller scale development is required to support sustainable communities," or Policy 12 where criterion (e) encourages new economic activity "in the rural service centres, and to a lesser degree in the other local rural centres to provide a framework for integrated rural development of an appropriate to support sustainable, rural communities and diversified economies." Local Development Frameworks should not be constrained by the narrow definition of 'urban areas' associated with this policy. The emphasis on the sequential approach should be previously developed land or buildings before greenfield, across a sustainable settlement hierarchy as defined by the Local Development Framework. This would support the principles of sustainable rural communities as set out in paragraph 2.25 of the RSS submission.

141 Brethren's Gospel Trusts

We support Policy 3 - The sequential approach to development, especially noting criteria (c) and (d) which recognise the contribution which can be made by urban fringe sites and PDL sites outside urban areas where no other sites can be identified higher in the priority order.

14 Brian Cazaly Ltd

Object to Submission Draft losing the Consultation Draft's reference to "executive housing" previously in para 2.9 before the wording of Policy 1. This should be re-instated.

Id No	Respondent	Policy 3
248	CABE	<p>The aim of the approach is to prioritise and regulate the market with regard to sites with similar attributes across adjacent local planning authorities within each of the identified conurbations / city regions.</p> <p>There is a need for additional details [category a) p19] regarding the definition of sustainable locations for development and consideration should be given to addressing the highly accessible brownfield locations with additional categories. Several operational frameworks for such an approach are possible [including Transport Development Areas and Transit Orientated Development] that relate the sustainability of development locations against their level of pedestrian accessibility to key public transit nodes and existing community and social infrastructure provision. These in turn are reinforced by broader urban restructuring policies including the setting of minimum densities, maximum car parking provision [and pricing of car parking spaces], mix of uses and variety [achieved through the division of larger development sites into smaller plots]. CABE would support the revision of this policy to establish a framework for urban restructuring according to sustainable development principles.</p>
428	Campaign To Protect Rural England	Very welcome policy. There is perhaps a need to justify the apparent or total exemption of the portfolio of Prestige Employment Services (Policy 19) from this sequential approach.
352	Church Commissioners for England	Supported
335	Derwentside District Council	The words " towns in regeneration areas " should be replaced with 2 regeneration centre" for consistency with policy 6 and Tyne & Wear City Region Map
102	Durham Tees Valley Airport	<p>The prioritisation of previously developed land is welcomed. The policy should however, acknowledge that there may be circumstances where the need for economic development in a particular location may justify exceptions to this approach. DTVA objects to this omission and requests the addition of the following paragraph after Policy 3d.</p> <p>“Development on previously undeveloped land will be allowed where it complies with the other policies of RSS and where no suitable previously developed land is available</p>
200	Environment Agency	Why not ‘shall’ or ‘must’? The policy should also refer to the regeneration of rural areas. The final sentence “All sites...etc.” should be moved to before “Locations should be selected....”.

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163 Friends of the Earth North East

Policy 3

“...climate change represents a potentially catastrophic threat, but it is within our control to address it- and address it we must.” (Tony Blair, UK Sustainable Development Strategy, P.3)

The UK Government has made tackling climate change one of its key objectives, both at an international level through the EU and G8, and through the UK Sustainable Development Strategy where it is one of the four shared priorities for UK action. The UK has made a commitment to reducing its greenhouse gas emissions under the Kyoto Protocol, and has set itself additional targets for carbon dioxide reduction of 20% below 1990 levels by 2010, and 60% by 2050. Friends of the Earth believes these targets represent the absolute minimum that the UK needs to achieve if global average temperatures are to be kept below the 2 degrees necessary to avoid catastrophic climate change. These UK targets will only be achieved if all regions and nations of the UK embrace them and put in place a robust policy and delivery framework to ensure they are met. Concerned as it is with the future development of the North East, the policies contained in the RSS have massive climate change implications. Unless climate change is explicitly factored into the policies on economic development, locational strategy, housing, retail, transport, waste and the natural environment, the RSS will result in increased greenhouse gas emissions. Not only will the North East therefore fail to contribute to meeting the UK's targets, it will actually be working against their achievement. Other parts of the UK will have to exceed their targets in order to compensate for the North East's failure. The only way to avoid this scenario is to include an overarching climate change policy in the RSS as part of a robust framework to ensure delivery of the UK's climate change objectives and targets.

The North East Assembly has so far rejected calls for the inclusion of such a policy, arguing that to have one would be to merely duplicate national policy. A climate change policy in RSS would in fact take Government targets and place them in a regionally-specific delivery context. This is essential if they are to be delivered. The existing RSS policy on renewable energy generation makes explicit reference to the Government's targets for 10% generation by 2010, and provides a regional framework for this to be delivered. The proposed climate change policy would be no different. Furthermore, PPS1 makes clear that, 'Regional planning bodies and local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change- through policies which reduce energy use, reducing emissions (for example, by encouraging patterns of development which reduce the need to travel by private car or reduce the impact of moving freight), promote the development of renewable energy resources, and take Climate Change impacts into account in the location and design of development' (para 13 ii).

Para 2.157 of the RSS states that, 'The IRF underpins all regional strategies by identifying broad objectives to ensure that activities are sustainable and future generations are fully considered. Objective 7 of the IRF is "to reduce the causes of climate change". The targets related to this objective are to: reduce emissions of the basket of 6 greenhouse gases by 12.5% relative to the 1990 level over the period 2008-10; cut carbon emissions by 20% below 1990 levels by 2010; and increase renewable energy generating capacity in the North East to 240-416MW by 2010. RSS supports, and provides a positive framework for the achievement of these targets.'

We would agree that the RSS provides a positive framework for the achievement of the renewable energy target because it contains policies explicitly designed to deliver this. However, without a policy on climate change (or indeed any policy on meeting these greenhouse gas and CO2 targets), the RSS is not providing any kind of framework for the achievement of the first two targets in Objective 7 of the IRF.

The RSS also accepts that, 'The challenge therefore is for the region to reduce emissions in line with national targets and adapt to the impacts that will take place. The North East region, like the UK as a whole, will have to meet the targets for reducing the six main greenhouse gases as set out in the Kyoto Protocol.' This can only be done through inclusion of a policy.

The Assembly has also stated that climate change is a cross-cutting theme throughout the RSS, and the policies within it are designed to meet the UK Government and the IRF targets. As the Sustainability Appraisal of the RSS notes, '...the rate of development proposed by the RSS for the North East will inevitably cause some environmental problems. In particular, the following problems are set to increase energy use and emissions of greenhouse gases' (p.4-5). This clearly demonstrates that the current status of climate change within the RSS is woefully inadequate.

Finally, the Assembly has said that a climate change policy cannot be included because the region does not have reliable estimates of its own greenhouse gas emissions, and that further work on the causes and impacts of climate change is needed before a policy can be put in place. Firstly, some regional data on emissions is already available. The Government's 'Regional quality of life counts- 2003' document states that, for the North East, total emissions of carbon dioxide were 9 million tonnes, or 3,400kg per head in 2001. The 'State of the Region Report 2003' published by the North East Regional Information Partnership contains further data on greenhouse gas emissions on page 122. These provide a baseline from which further work can be done. However, comprehensive information is not necessary for a policy to be included. The purpose of a climate change policy in RSS is to ensure that all development decisions both regionally and locally contribute to reducing emissions of greenhouse gases, but particularly CO₂, to a certain level. The only requirement for this is a baseline figure on emissions (above), and the target which you are seeking to reduce emissions to (as provided by the Government and IRF). Both the Yorkshire & the Humber RSS and the draft South East Plan contain a climate change policy embracing the UK Government's emissions reductions targets. Neither of these regions obtained comprehensive climate change or emissions data prior to including a policy, instead making the collection and collation of such information an immediate priority as part of further work on the issue. In its climate change policy, the Yorkshire & Humber RSS has made a commitment to producing a regional action plan to help ensure that the policy's targets are delivered, a commitment which has already been met.

Friends of the Earth therefore contends that the lack of a climate change policy in the draft North East RSS is a fundamental and totally unjustified omission which must be rectified prior to the Strategy's approval.

We recommend the following policy for inclusion as a new policy 3 to highlight its prominence as a key, overarching issue for the region:

Policy 3- Climate Change

Regional and local authorities, agencies and others will include policies and proposals in their plans, strategies and investment programmes to help reduce the region's carbon dioxide emissions by at least 20% below 1990 levels by 2010, 30% by 2015 and 35% by 2021. Plans should be made for a minimum 60% reduction by 2050. Where possible, annual reductions of 3% per year should be aimed for. Targets will be reviewed annually to ensure compliance with those set at the national and international level, and revised upwards wherever possible.

Regional and local authorities will produce a climate change action plan to deliver emissions reductions within 12 months of the adoption of this Strategy. This will include an emissions inventory to monitor and model past and present CO₂ emissions by sector, as well as projected future emissions.

All development and redevelopment proposals will be assessed for their climate change impacts to ensure their consistency with meeting emissions reductions targets. There will be a presumption against any new development which results in a net increase in carbon emissions

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over the Plan period.

In order to ensure a consistent approach to tackling climate change, strategies, plans and programmes will ensure that the issue is fully addressed in each of the following policy areas in the manner specified:

- Transport- reducing the need to travel by unsustainable modes, modal shift from unsustainable to sustainable modes and a reduction in traffic levels.
- Sustainable Communities- reducing energy, water and natural resource consumption in all new development and redevelopment. Incorporating sustainable drainage measures. Ensuring good, accessible, local provision of jobs, shops and services for all communities.
- Locational Strategy- locating development so as to minimise travel by unsustainable modes and at minimal risk from flooding, erosion, water shortages and subsidence. Minimising the flood risk to existing development, heritage and biodiversity.
- Energy- ensuring all new grid energy generation is from renewable sources, and harnessing the potential for small-scale renewables embedded within new developments and redevelopments. Seeking ways to minimise energy consumption and maximise efficiency. Promoting renewable sources of heat and alternative transport fuels.
- Natural environment- harnessing the potential for biodiversity in floodplain areas, protecting key biodiversity sites from climate change effects, promoting land use that acts as carbon sinks and maximising tree cover.
- Waste management- minimising waste generation, and avoidance of disposal through landfill and incineration.

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329 Friends of the Earth South Tyneside

New policy 3- climate change

“...climate change represents a potentially catastrophic threat, but it is within our control to address it- and address it we must.” (Tony Blair, UK Sustainable Development Strategy, P.3)

The UK Government has made tackling climate change one of its key objectives, both at an international level through the EU and G8, and through the UK Sustainable Development Strategy where it is one of the four shared priorities for UK action. The UK has made a commitment to reducing its greenhouse gas emissions under the Kyoto Protocol, and has set itself additional targets for carbon dioxide reduction of 20% below 1990 levels by 2010, and 60% by 2050. South Tyneside Friends of the Earth believes these targets represent the absolute minimum that the UK needs to achieve if global average temperatures are to be kept below the 2 degrees necessary to avoid catastrophic climate change. These UK targets will only be achieved if all regions and nations of the UK embrace them and put in place a robust policy and delivery framework to ensure they are met. Concerned as it is with the future development of the North East, the policies contained in the RSS have massive climate change implications. Unless climate change is explicitly factored into the policies on economic development, locational strategy, housing, retail, transport, waste and the natural environment, the RSS will result in increased greenhouse gas emissions. Not only will the North East therefore fail to contribute to meeting the UK’s targets, it will actually be working against their achievement. Other parts of the UK will have to exceed their targets in order to compensate for the North East’s failure. The only way to avoid this scenario is to include an overarching climate change policy in the RSS as part of a robust framework to ensure delivery of the UK’s climate change objectives and targets.

The North East Assembly has so far rejected calls for the inclusion of such a policy, arguing that to have one would be to merely duplicate national policy. A climate change policy in RSS would in fact take Government targets and place them in a regionally-specific delivery context. This is essential if they are to be delivered. The existing RSS policy on renewable energy generation makes explicit reference to the Government’s targets for 10% generation by 2010, and provides a regional framework for this to be delivered. The proposed climate change policy would be no different. Furthermore, PPS1 makes clear that, ‘Regional planning bodies and local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change’ (para 13 ii).

Para 2.157 of the RSS states that, ‘The IRF underpins all regional strategies by identifying broad objectives to ensure that activities are sustainable and future generations are fully considered. Objective 7 of the IRF is “to reduce the causes of climate change”. The targets related to this objective are to: reduce emissions of the basket of 6 greenhouse gases by 12.5% relative to the 1990 level over the period 2008-10; cut carbon emissions by 20% below 1990 levels by 2010; and increase renewable energy generating capacity in the North East to 240-416MW by 2010. RSS supports, and provides a positive framework for the achievement of these targets.’

We would agree that the RSS provides a positive framework for the achievement of the renewable energy target because it contains policies explicitly designed to deliver this. However, without a policy on climate change (or indeed any policy on meeting these greenhouse gas and CO2 targets), the RSS is not providing any kind of framework for the achievement of the first two targets in Objective 7 of the IRF.

The RSS also accepts that, ‘The challenge therefore is for the region to reduce emissions in line with national targets and adapt to the impacts that will take place. The North East region, like the UK as a whole, will have to meet the targets for reducing the six main greenhouse gases as set out in the Kyoto Protocol.’ This can only be done through inclusion of a policy. The Assembly has also stated that climate change is a cross-cutting theme throughout the RSS, and the policies within it are designed to meet the UK Government and the IRF targets. As the Sustainability Appraisal of the RSS notes, ‘...the

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rate of development proposed by the RSS for the North East will inevitably cause some environmental problems. In particular, the following problems are set to increase...energy use and emissions of greenhouse gases' (p.4-5). This clearly demonstrates that the current status of climate change within the RSS is woefully inadequate. Finally, the Assembly has said that a climate change policy cannot be included because the region does not have reliable estimates of its own greenhouse gas emissions, and that further work on the causes and impacts of climate change is needed before a policy can be put in place. Firstly, some regional data on emissions is already available. The Government's 'Regional quality of life counts- 2003' document states that, for the North East, total emissions of carbon dioxide were 9 million tonnes, or 3,400kg per head in 2001. The 'State of the Region Report 2003' published by the North East Regional Information Partnership contains further data on greenhouse gas emissions on page 122. These provide a baseline from which further work can be done. However, comprehensive information is not necessary for a policy to be included. The purpose of a climate change policy in RSS is to ensure that all development decisions both regionally and locally contribute to reducing emissions of greenhouse gases, but particularly CO₂, to a certain level. The only requirement for this is a baseline figure on emissions (above), and the target which you are seeking to reduce emissions to (as provided by the Government and IRF). Both the Yorkshire & Humber RSS and the draft South East Plan contain a climate change policy embracing the UK Government's emissions reductions targets. Neither of these regions obtained comprehensive climate change or emissions data prior to including a policy, instead making the collection and collation of such information an immediate priority as part of further work on the issue. In its climate change policy, the Yorkshire & Humber RSS has made a commitment to producing a regional action plan to help ensure that the policy's targets are delivered, a commitment which has already been met. South Tyneside Friends of the Earth therefore contends that the lack of a climate change policy in the draft North East RSS is a fundamental and totally unjustified omission which must be rectified prior to the Strategy's approval. We recommend the following policy for inclusion as a new policy 3 to highlight its prominence as a key, overarching issue for the region:

Policy 3- Climate Change

Regional and local authorities, agencies and others will include policies and proposals in their plans, strategies and investment programmes to help reduce the region's carbon dioxide emissions by at least 20% below 1990 levels by 2010, 25% by 2015 and 30% by 2021. Plans should be made for a minimum 60% reduction by 2050. Where possible, annual reductions of 3% per year should be aimed for.

Regional and local authorities will produce a climate change action plan to deliver emissions reductions within 12 months of the adoption of this Strategy.

All development and redevelopment proposals will be assessed for their climate change impacts to ensure their consistency with meeting emissions reductions targets. There will be a presumption against any new development which results in a net increase in climate change emissions.

In order to ensure a consistent approach to tackling climate change, strategies, plans and programmes will ensure that the issue is fully addressed in each of the following policy areas in the manner specified:

- Transport- reducing the need to travel by unsustainable modes, modal shift from unsustainable to sustainable modes and a reduction in traffic levels.
- Sustainable Communities- reducing energy, water and natural resource consumption in all new development and redevelopment. Incorporating sustainable drainage measures. Ensuring good, accessible, local provision of jobs, shops and services for all communities.

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- Locational Strategy- locating development so as to minimise travel by unsustainable modes and at minimal risk from flooding, erosion, water shortages and subsidence. Minimising the flood risk to existing development, heritage and biodiversity.
- Energy- ensuring all new grid energy generation is from renewable sources, and harnessing the potential for small-scale renewables embedded within new developments and redevelopments. Seeking ways to minimise energy consumption and maximise efficiency. Promoting renewable sources of heat and alternative transport fuels.
- Natural environment- harnessing the potential for biodiversity in floodplain areas, promoting land use that acts as carbon sinks and maximising tree cover.
- Waste management- minimising waste generation, and avoidance of disposal through landfill and incineration

South Tyneside Friends of the Earth strongly supports the use of the sequential approach to development as a key way of ensuring the planning system helps to deliver sustainable development. For this reason, it is vital that the policy directs development towards the reuse of previously-developed land and buildings, and to sites that are well-connected to public transport, walking and cycling. We recommend that policy 3 is amended as below. Altered text is in italics:

“Regional and local planning authorities will adopt a sequential approach to the identification of land for development to give priority to previously developed land and buildings in the most sustainable locations. Locations will be selected in the following priority order:

- a) Suitable previously-developed sites and buildings within urban areas, particularly around public transport nodes, and walking and cycling routes;
- b) Other previously-developed sites well-connected to public transport links, walking and cycling;
- c) Other suitable locations within urban areas not identified as land to be protected for nature or heritage conservation or recreational purposes;
- d) Suitable sites in settlements outside urban areas that are, or will be, well-connected to public transport, walking and cycling, and particularly those that involve the use of previously developed land and buildings.

All sites must meet the following criteria:

- Be highly accessible by public transport, walking and cycling.
- Be consistent with the need to reduce greenhouse gas emissions
- Fit within the capacity of existing infrastructure (public transport, water, utilities, schools, hospitals etc) to absorb further development. If additional infrastructure would be required, this must be consistent with sustainable development.
- Be at lowest risk of flooding, and take full account of other physical constraints on the development of land, for example the level of contamination and land stability.
- Protect areas of biodiversity, landscape and heritage value.
- Protect, and where possible enhance, air, water and soil quality. Development should not be located where it is likely to exacerbate existing problems with air, water and soil quality.
- Contribute to strengthening the social, economic and environmental fabric of the surrounding area.

Id No	Respondent	Policy 3
4	Friends of the Earth Tyne Bridge	<p>Tyne Bridge FoE strongly supports policy 3 and will greatly contribute towards the sustainable development of the region. The emphasis should be on accessibility by non-car modes of transport including walking and cycling, the health, social and environmental benefits of which are very significant. The wording of this policy should reflect this.</p> <p>These principles should also apply regionally, including to Prestige Employment Sites which appear to contradictory</p>
8	Gateshead Council	<p>The sequential Approach - The supporting text for policy 3 (para 2.9) should explain how to deal with circumstances where the RSSs sequential and locational strategy conflicts with other sequential approaches, for example, PPG 25 and the sequential approach to town centre development. It should also recognise that development plans will probably take more detailed sequential approaches for different uses.</p>
195	Grainger Trust	<p>Although support is given for the principle of sustainable development, there is still no reference made to the priority regeneration areas or specifically reclaimed land.</p> <p>Therefore, the policy does not take into account the need to regenerate these priority areas and the important role that land, other than previously developed, has to trigger regeneration. The need still exists to add an additional criterion to ensure that regeneration areas are recognised and considered in the sequential approach to ensure that the regeneration prospects of Rural Coalfield Communities are not harmed.</p>
164	Hallam Land Management Ltd	<p>The Sequential Approach to Development is supported</p>
454	Hartlepool Civic Society	<p>Support approach and urges this should include business/industrial use to encourage improvement to Brownfield sites and underused buildings in town centres. Care is needed to prevent increased density to occupation which will have detrimental effects on traffic, service provision and character and quality of environment</p>
160	Highways Agency	<p>Development Plans and LDFs should adopt such an approach to the identification of land for development. Priority given to previously developed land especially within urban areas and those well related to homes/jobs and public transport.</p>

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424 Home Builders Federation

With reference to Policy 3 and the supporting text, the HBF are supporters of the sequential approach to brownfield development first - provided it fits with the location strategy. The text in the supporting paragraphs 2.13 to 2.17 is welcomed as recognition of the need to consider on-going economic change and its impact upon housing markets.

With reference to the Greenfield/Brownfield discussion and the need to consider the impact of greenfield releases on other regeneration initiatives, the HBF would welcome additional comment on the most recent ODPM consultation paper 'Planning for Housing Provision'. Although there is a southern bias towards improving the delivery of new homes written into the consultation paper, the references to operating with 'floors and ceilings' is relevant to this draft RSS. At times when the region's economy is expanding at a faster rate than that predicted in the RSS, then an extra level of flexibility should be introduced into the system to allow growth to occur without being overly constrained by long-term regeneration programmes. Furthermore, the recent suggestion to re-introducing 5 year rolling land availability plans is also welcomed and relevant to this RSS. Too often development is constrained by regeneration initiatives either awaiting public funding or, in the cases of Pathfinder sites, are already covered in occupied housing.

131 Member of Public

Although my clients do not object to the sequential approach as a whole, as it is clearly in line with current policy at a National level, they feel that the policy should reflect the constraints of those settlements outside urban areas where not all development can be within settlement boundaries.

My clients wish to see the final stage in the sequential approach d) revised to read the following:-

d) suitable sites within and adjoining settlements outside urban areas, particularly those that involve the use of previously-developed land or buildings.

132 Member of Public

2.2. Although my clients do not object to the sequential approach as a whole, as it is clearly in line with current policy at a National level, they feel that the policy should reflect the constraints of those settlements outside urban areas where not all development can be within settlement boundaries.

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184 Member of Public

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186 Member of Public

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My clients wish to see the final stage in the sequential approach d) revised to read as follows:-

d) suitable sites within and adjoining settlements outside urban areas, particularly those that involve the use of previously-developed land or buildings.

470 Member of Public

I strongly agree that Local Development Frameworks should adopt a sequential approach to the identification of land for development to give priority to previously developed land and buildings in the most sustainable locations. The expectation that locations should be selected in the stated priority order should be strictly interpreted, and it must be an absolute requirement that all sites should be in locations that are, or will be, at lowest risk from flooding, and well related to homes, jobs and services by all modes of transport, particularly public transport, walking and cycling.

442 Member of Public

Although my clients do not object to the sequential approach as a whole, as it is clearly in line with current policy at a National level, they feel that the policy should reflect the constraints of those settlements outside urban areas where not all development can be within settlement boundaries.

My clients wish to see the final stage in the sequential approach d) revised to read the following:-

d) suitable sites within and adjoining settlements outside urban areas, particularly those that involve the use of previously-developed land or buildings.

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453 Member of Public

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The Sustainability Appraisal of the RSS states the rate of development proposed by the RSS will inevitably cause some environmental problems. This demonstrates the current status of climate change in the RSS is inadequate

The Assembly said climate change policy cannot be included because the region does not have reliable estimates of its greenhouse gas emissions and further work on the causes of and impact of climate change is needed before a policy can be put in place.

Some regional data is already available:

"Regional Quality of Life Counts 2003"

"State of the Region Report 2003"

Comprehensive information is not necessary for a policy to be included. The purpose of a policy is to ensure all development decisions contribute to reducing greenhouse gas emissions. The only requirement for this is a baseline figure on emissions and the target you are seeking to reduce emissions to.

Recommend a new policy for inclusion so plans strategies and investment programmes help reduce the region's CO2 emissions by at least 20% below 1990 levels by 2010, 25% by 2015 and 30% by 2021. Plans should be made for a minimum 60% reduction by 2050. Where possible annual reduction of 3% per year should be aimed for.

Authorities will produce an action plan to deliver emission reduction within 12 months of the adoption of the strategy and all development proposals will be assessed for climate change impacts

strategies plans and programmes will ensure the issue is fully addressed in each of the following policy areas

Transport

Sustainable Communities

Locational strategy

energy

Natural Environment

Waste Management

Sequential approach to identification of development land is a vital policy. Amend as below:

Replace

"LDFs should adopt" with "Regional and local planning authorities will adopt "

"Locations should be selected" with "locations will be selected"

replace b) with b) other previously developed sites well connected to public transport links

"particularly those that involve the use of previously developed land and buildings" with "areas that are or will be well connected to public transport, walking and cycling and particularly those that involve the use of previously developed land and buildings"

All sites must meet following criteria;

Be highly accessible by public transport, walking and cycling or have the ability to be so

Protect areas of biodiversity landscape heritage and heritage value

Fit within the capacity of existing infrastructure to absorb further development. Additional infrastructure must be consistent with sustainable development

Beat lowest risk of flooding and take full account of other physical constraints on the development of land

protect and where possible enhance air water and soil quality

Contribute to strengthening the social economic and environmental fabric of the surrounding area

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293	Member of Public	As this is already essentially a PPG is it needed?
185	Middlesbrough Council	<p>The sequential approach in policy 3 prioritises brownfield sites in urban areas, followed by other urban sites, and then urban extensions, particularly on brownfield sites. This would give low priority to Hemlington Grange, and as worded, fails to acknowledge national planning guidance that in some circumstances urban extensions may be more sustainable than development of greenfield sites in existing urban areas. It is important that policies elsewhere in RSS do not delay delivery of a sustainable mixed use community at Hemlington Grange. (refer also to comments on paragraph 3.73 which makes the case for a mixed use urban extension at Hemlington Grange).</p> <p>Requested Changes - Policy 3 © should be expanded to refer to sustainable locations in addition to brownfield land.</p> <p>It is also important that policies elsewhere in RSS do not delay delivery of a sustainable mixed use community at Hemlington Grange. Policy 3 sets out the sequential approach to development. This prioritises brownfield sites in urban areas, followed by other urban sites. And then urban extensions, particularly on brownfield sites. This would give low priority to Hemlington Grange, and as worded, fails to acknowledge national planning guidance that in some circumstances urban extensions may be more sustainable than development of greenfield sites in existing urban areas. (Refer also to para 23 which makes the case for a mixed use urban extension).</p>
272	Middlesbrough Town Centre	Policy is helpful in establishing a sequential priority order for new development and clearly establishes a priority for development in urban areas followed by Brownfield sites. This is supported.
94	Nectar	Policy 3 is supported by NECTAR.
152	PD Ports (Victoria Harbour)	PD Ports supports the proposed sequential approach to development and the clear prioritisation of suitable previously developed sites and buildings within urban areas, such as Victoria Harbour, at the top of the sequential hierarchy.

Id No	Respondent	Policy 3
128	Pennyman Trust and Farrow Trust	<p>The sequential approach in the policy does not reflect the guidance in Paragraph 30 of PPG3 which states that the search sequence should start with “the re-use of previously-developed land and buildings within urban areas then urban extensions and finally new development around nodes in good public transport corridors”.</p> <p>Policy 3 of the RSS appears too rigid in its sequential approach as it does not adequately provide for greenfield urban extensions on the edge of the major urban areas and should more closely reflect the policies contained in PPG3.</p> <p>Paragraph 65 of PPG3 in considering developing outside urban areas requires “local planning authorities to utilise the most sustainable option”, that is not reflected in the proposed RSS policy. Apparent conflicts with PPG3 should be avoided and reflected in the RSS as this would assist in creating certainty. In the Tees Valley City Region urban extensions to the south and south west of Middlesbrough would be the most sustainable option for development after all genuinely available previously-developed sites within the urban area have been developed.</p>
66	Railfuture NorthEast	Railfuture northeast supports Policy 3
403	Sainsbury's Supermarkets	<p>We support the overall levels of proposed housing growth across the region which reflects housing market restructuring, the availability of previously developed land and the prevailing economic/demographic projections. The increased levels of housing growth, with particular reference to Newcastle, Sunderland and South Tyneside. Also reflects the locational strategy to direct the majority of new development to the city regions.</p>
151	Sunderland ARC	<p>The Sequential Approach to Development is strongly supported and Sunderland arc attaches particular importance to maintaining the integrity of this policy.</p>
148	Tees Valley Regeneration	<p>The Sequential Approach to development is now contained in a number of Government Guidance Notes and Policy Statements. It is fundamental to the current planning and development process. TVR is promoting well-located sites and consequently fully supports the proposed sequential approach to development in the emerging RSS and the clear prioritisation of suitable previously developed sites and buildings within urban areas at the top of the sequential hierarchy. It is considered that Policy 3 provides a more sensible approach to the issue of flood risk (than Policy 2) by stating that development should be in locations that are, or will be, at lowest risk from flooding</p> <p>We also note the caveat added to the top priority (a) suitable previously-developed sites and buildings within urban areas, particularly around public transport nodes. This appears sensible to us not least as TVR’s sites relate very well to and promote such nodes. For example, Middlehaven is close to the main railway station and on or immediately adjacent to numerous major bus routes.</p>

Id No	Respondent	Policy 3
415	Tithe Barn Land	<p>Page 19, Policy 3 I support “All sites.....by all modes of transport, particularly public transport, walking and cycling” This condition particularly supports the site I represent</p>
105	Tynedale Council	<p>The policy on the sequential approach to development, in effect places green field sites within, (part b) or even as extensions (part c) to one of the three main rural service centres in Tynedale, (i.e. Hexham, Prudhoe and Haltwhistle), sequentially above previously developed sites located within either local service centres, (i.e. Corbridge, Haydon Bridge, Allendale and Bellingham) or other sustainable villages. This seems to be out of line with the intentions of PPG3 in that it could lead to pressure for the development of peripheral green field sites even though previously developed sites were available in perfectly sustainable locations elsewhere. Later policies provide clear guidance on the relative scale of development in regional, sub-regional centres etc and this is supplemented by clear policies in the adopted Northumberland County and National Park Joint Structure Plan, covering main towns, local centres and smaller settlements respectively. This policy should just deal with the sequential approach to previously developed land ahead of green field land in any sustainable settlement. (This would also be in line with the statement in the glossary of the Draft RSS, which defines the “Sequential Approach to Development” as “Criteria based approach for the selection of development sites focussed on bringing previously developed land forward first.”)</p>
254	UK Coal Mining Ltd	<p>Paragraph 2.9 and Policy 3 – The Sequential Approach to Development Paragraph 2.9 should be amended to acknowledge that Policy 3 does not apply to minerals development as minerals can only be worked where there are found. This revision would be consistent with the approach adopted for renewable energy. In addition, Policy 3 should be amended to include a criteria to enable development that would contribute to the economic growth of the region in locations that are not necessarily within or adjacent to urban areas and settlements. This could include tourism related development such the Blue Sky Forest project or potentially a Prestige Employment Site, such as that promoted in the current Regional Planning Guidance for the North East to the North of Sunderland. In addition there are a number of rail linked sites in the region that could be used to improve the connectivity and accessibility within and beyond the region in accordance with criterion d) of Policy</p>
187	Yuill Homes	<p>We support the sequential approach promoting brownfield development first, provided it fits with the location strategy, and provided that a clear time scale for availability of sites (and deliverability of schemes) is included. With regard to housing, greenfield sites should be released if brownfield site are not yet available for development. Once those brownfield sites have a clear delivery time scale, then it would be reasonable to withhold release of greenfield sites. To do otherwise will stifle housing supply, leading to increasing affordability problems</p>