

Policy 35

Id No Respondent

202 Durham County Council

Policy 35

Policy needs to be revisited and rewritten to take account of new PPS9 more closely by, for example, requiring strategies, plans and programmes to:

- Identify any areas or sites for the restoration of new priority habitats which contribute to regional targets, and support this restoration or creation through policies in plans.
- Conserve important natural habitat types identified in the CROW Act 2000 Section 74 list and identify opportunities to enhance and add to them.
- Encourage the conservation of features like important hedgerows and veteran trees as part of development proposals.
- Maintain networks of natural habitats by avoiding or repairing their fragmentation and isolation and protecting them from development.

172 Durham Heritage Coast

Support

95 English Nature,

Propose amend text in item (d) to read:

"providing for the expansion and linking of existing habitats and species populations including the recreation of semi natural green spaces in and around urban areas as key elements of green infrastructure plans and for habitat restoration"

Reason: to integrate the biodiversity and geodiversity into green planning

Propose amend the Coastal Zone graphic on Environment Map 1 to indicate a broader zone both inland and seaward

Reason: to more fully represent the indicative extent of the Coastal Zone within which the management and enhancement of biodiversity resources is a strategic priority for the region.

Propose add new criterion i) to read

"encourage the conservation of features such as important hedgerows and veteran trees as part of development proposals"

Reason: these are key components of green infrastructure

Propose add two further indicators for biodiversity policy 35 in the implementation plan:

i) number of planning permissions granted that have conditions or planning obligations attached requiring the delivery of biodiversity/geodiversity gains

ii) planning permissions granted which have conditions attached to secure the future of protected species

Reason: to give greater weight to these factors in the implementation plan

200 Environment Agency

3.99 – 3.104

We fully endorse this excellent section.

Id No	Respondent	Policy 35
163	Friends of the Earth North East	<p>Friends of the Earth welcomes and supports the protection given to biodiversity in this policy, which is both intrinsically valuable and a key contributor to human well-being and quality of life.</p> <ul style="list-style-type: none"> Although LDFs are listed as being one of the key delivery mechanisms for this policy, neither the outcomes nor the indicators make specific reference to them. We suggest the outcomes be amended along the following lines: '100% of LDFs to include a specific policy to deliver regional biodiversity targets, and the priorities set out in policy 35 and the Local BAP.
329	Friends of the Earth South Tyneside	<p>South Tyneside Friends of the Earth welcomes and supports the protection given to biodiversity in this policy, which is both intrinsically valuable and a key contributor to human well-being and quality of life.</p>
8	Gateshead Council	<p>Policy 35 and the supporting text should refer to locally and regionally important second tier sites such as Sites of Nature Conservation Importance and Local Nature Reserves. This would be analogous to the support given in the built environment section for locally listed buildings, which are effectively second tier listed buildings.</p>
215	Government Office For The North	<p>Para 3.103 'Natural Commitment' is the only example we have seen of an English Nature driven regional partnership developing a clear focus on the SSSI PSA target. Support RSS in helping to sustain momentum behind it.</p>
160	Highways Agency	<p>Ensure that the regions ecological and geological resources are protected and enhanced to return key biodiversity resources to viable levels.</p>
681	Member of Public	<p>Support . In para e) would prefer a commitment to improving the region's SSIs to a favourable status by 2010 together with a target for percentage of SSIs achieving this status</p>
449	National Trust North East	<p>The National Trust supports this policy in itself, but does not consider that it should be a stand-alone policy. Biodiversity needs to be considered alongside a multitude of other policies in the RSS, and needs to be considered in a more cross-cutting manner.</p>
256	North East Wildlife Trust	<p>Biodiveristy and Geodiversity: too much emphasis on protected areas and designated sites - We welcome the inclusion of the section on biodiversity and geodiversity and its general tenor including the consideration given to the importance of biodiversity in the region. However, more than most issues included in the RSS, biodiversity is a cross-cutting issue and should permeate the document as a whole more comprehensively, linking for example to the Green Belt policy and other sections.</p>
<p>However, we would like to make the following observations and detailed comments:</p>		
<ul style="list-style-type: none"> - The recommendations of new Planning Guidance PPS9 are not incorporated adequately, if at all. - There is too much emphasis on biodiversity in Protected Areas as if it only exists in these 'preserves'. It is of great concern that SNCIs are not considered or the value of the wider (mostly farmed) countryside recognised as integral to the region's biodiversity. There needs to be recognition that biodiversity is enhanced in the region due to the overall connectivity of wildlife opportunities afforded across the whole continuum present between urban greenspace - urban/rural fringe - wider countryside and SNCIs and protected areas. PPS9 adds further weight to their inclusion and increased emphasis on the importance of SNCIs. 		
<p>In particular, the emphasis on SSSIs and non-recognition of SNCIs presents the RSS implementation with a real problem in monitoring improvements in regional biodiversity. Not enough (<40%) of SSSIs are currently in favourable condition and are therefore not good indicators of regional biodiversity alone. Including SNCIs as local indicators of biodiversity would give a better evaluation framework to monitor biodiversity progress across the region and this has been identified through the Sustaine Regional Indicators.</p>		

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222	Northumberland County Council	The County Council considers that the policy does not adequately address the conservation of existing features of nature conservation value in the wider countryside and as such does not conform to Regulation 37 of the Habitat Regulations 1994.
136	Northumberland National Park	<p>The policy requires strengthening to make reference to the EC Habitats Directive. Article 10 of the Directive promotes the inner-connectivity of existing Special Areas of Conservation and indeed wildlife habitats as a whole. While this is mentioned to some extent in 35b) it is not strong enough. The opportunity should be taken in the RSS to identify potential biological corridors on a regional scale and to support the development and enhancement of these in a meaningful way. In many cases the strategic river corridors would be used as a basis of these wildlife corridors. Such a policy linking for example the Northumberland National Park to the North Northumberland Coast would have immense benefits not only for wildlife, acting as a buffer against climate change, but also as a recreational resource. Other European countries are being bold in developing regional corridors and indeed international corridors. The opportunity is there for the north east to lead the way in an English context.</p> <p>The policy is supported.</p>
338	Northumberland Tyne & Wear NHS	Statement H may be helpful.
151	Sunderland ARC	Biodiversity and Geodiversity is supported
105	Tynedale Council	<p>It is noted that the Biodiversity Target Zones include areas within the District. If it is the case that policies will need to be incorporated into LDFs – possibly including the more precise definition of areas on Proposals Maps – then this should be made clear. It is also noted that the policy has been expanded to include a requirement that Local Biodiversity and Geodiversity actions should be included in Community Strategies. If there is guidance on how this can be achieved, then this should be referenced here.</p>
431	Woodland Trust	<p>The Woodland Trust objects to the term as ‘viable levels’ of biodiversity resources (first sentence), as viable levels cannot be adequately measured or monitored rendering this policy to vague and open to a wide variety of interpretations.</p> <p>Due to difficulties in measuring the quality and health of the environment, especially in enhancement it would be more appropriate for wording to describe the actions required as a proxy to achieving ‘viable levels.’</p> <p>Recommendation: amend the first sentence of Policy 37. This could read: “strategies, plans and programmes should ensure that the region’s ecological and geological resources are protected and enhanced through landscape scale action seeking to conserve, enhance and extend all semi-natural habitats.</p> <p>The Woodland Trust strongly supports the addition of Paragraph 3.101 as it describes the importance of de-fragmentation to the long term survival of biodiversity and in particular ancient woodland. As described in our previous consultation response ancient woodland is our richest habitat for wildlife but also a fragile and irreplaceable resource, therefore we are particularly pleased of the focus on ancient woodland in Paragraph 3.101.</p> <p>We also support the highlighting of the areas of ancient woodland concentration within the region as geographic reference help to galvanise action and support.</p> <p>The Woodland Trust objects to the removal of the bullet point ‘mitigate and adapt to the effects of climate change’ from Policy 35. This removal seems to contradict the recommendations of the Sustainability Appraisal as described in Paragraphs 2.21 and 2.22 that climate change is not adequately considered within the draft and should be further integration into policies.</p>

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We particularly object to the removal of this bullet point because of the significant impacts climate change is already having on our biodiversity. For example the work of the UK Phenology Network and our partnership with the BBC in the Springwatch campaign has shown that:

- Bumblebees and peacock butterflies were seen on average about 3 weeks earlier than 30 years ago
- Hawthorn flowered about 2½ weeks earlier than 30 years ago.
- Swifts appear to have arrived about a week earlier this year than in recent warm years and 30 years ago.

This is important as species are interdependent and animals and plants should remain in synchrony. At present insects seem to be responding to temperature changes at the same rate as their food-plants. For example orange tip butterflies and garlic mustard and winter moth and oak trees. However the life cycle of frogs may have been affected this year as early spawn was found frozen and dead in the cold snap in late February. As frogs only breed once a year climate change may have significantly affected their life cycle

As climate change accelerates, more species may no longer be synchronised with the species on which they depend and in turn this could have serious implications for their survival.

As such action to mitigate climate change whilst also adapting to the impacts is not only important but urgent.

Recommendation: to reinsert the deleted bullet point