

**INTERNATIONAL ADVANCED MANUFACTURING PARK****AREA ACTION PLAN****Matter 7 Environment and Ecology****Submission by Richard Cowen on behalf of CPRE North East and Durham Bird Club**

*Question 7.1 Are policies EN1 and EN3, in respect of the landscape and green infrastructure, soundly based? And in particular:*

- Are the requirements of part A of policy EN1 inappropriately restrictive?*
- Are the modifications to policies EN1 and EN3 proposed by the Councils (Docs PSD6/PSD7) necessary for the plan to be sound?*

On behalf of CPRE NE, I represent that Part A of policy EN1 is not inappropriately restrictive. In Mrs Gibson's letter of 24 September, CPRE NE specified criteria regarding buildings that we considered were essential. This approach has enabled us to reach the decision not to object to these deletions from the green belt as I have outlined in my statement regarding Matter 4. However, as far as Policy EN1 point iv is concerned, we would prefer to see a stronger phrase than "consider the incorporation of green and brown roofs and green walls". Does this mean that the decision maker has only to think about such issues and that is sufficient?

We are also concerned that there is no definition or guidance regarding green and brown roofs and green walls. While "green roofs" may be a term that is generally understood these days, I am not clear that the term "brown roofs" is so understood. Clarification of "green walls" would also be useful.

As far as Policy EN3 is concerned, we welcome these proposals which we represent are now essential to consider in all proposed large scale developments such as this. Such proposals are, we represent, consistent with paragraph 109 on the National Planning Policy Framework. However, we represent that the Policy should include a reference to ecological use, not just recreational use. This would be consistent with the reference, in paragraph 169, to marshy areas and ponds, unlikely to be used for "recreational use" simpliciter.

We note the description given to Green Infrastructure in paragraph 169. We note this term is also defined in the NPPF. Therefore it does appear that, in this case, there is some description or guidance as to what this term means. However, we represent that the glossary should contain a definition of this term as well as the terms above so that there is a handy reference place for such definitions, or at least guidance as to their interpretation.

I therefore represent that these policies as amended are, subject to the comments above, required in order to make the Plan sound

*Question 7.2 Is policy EN2, in respect of ecology, soundly based? And in particular:*

- *Are modifications necessary in respect of the specific comments of the Durham Bird Club?*
- *Does the plan adequately reflect the Water Framework Directive?*
- *Is the requirement to enhance various aspects of ecology, as proposed by the Councils as modifications to policy EN2 (Docs PSD6/PSD7), necessary for the plan to be sound?*

In respect of this Policy, I believe it is necessary to refer to the letter I wrote on behalf of Durham Bird Club dated 18 September 2016 where I commented that the Club had made representations to the Local Nature Partnership (now the North East England LNP) that the Durham Biodiversity Action Plan (DBAP) appeared to be out of date in respect of birds. As a result, the LNP prepared a new list of priority birds in Northumberland and Durham

I note the Glossary still refers to the DBAP which is not mentioned elsewhere in the Plan but makes no reference to the LNP. I note the LNP is mentioned in Appendix B as a source for Policies EN2 and EN3. I have spoken to a LNP representative who confirmed the role they played.

I represent that the text in relation to this policy should refer to the Priority List of birds prepared by the LNP with a view to enhancing the protection to birds mentioned on this List and found in this area. Consideration should also be given to deleting the reference to DBAP in the Glossary and adding a reference to the LNP. In saying that, I acknowledge that the DBAP still has more status in local plans than the LNP Priority List (and will still be relevant for any wildlife other than birds) but if the only reference to the DBAP is in the Glossary of this Action Plan, then it is a meaningless inclusion.

Policy EN2iii refers to minimising the loss of "semi-natural habitats". Again, there is no definition or guidance relating to this term. I note that in the State of Nature Report 2016, it refers to such habitats "such as hedges, ponds and field margins". The term "semi-natural" however appears in this Report relation to other habitats such as grasslands. There is no guidance regarding this term in the NPPF. On behalf of the Bird Club, I represent that some guidance should be given in the Action Plan as to the interpretation of this term.

This may be particularly important as in my Bird Club letter of 18 September, I referred to the loss of wetlands and the alarming decline in farmland species, an issue referred to in the State of Nature Reports of 2016 and 2013. It does not appear that the Policy as worded makes adequate provision for either of these issues.

While farmland is not generally regarded as "semi-natural habitat", the greatest loss of habitat if these proposals go ahead is farmland. There are no policies in the Action Plan to address this particular loss of habitat or the farmland species that live there. The Club represents that active steps need to be taken to help to halt the decline of the farmland species that are still found in this area.

While the land surrounding the River Don between the North and South parts of the proposed development may not be adequate to provide farmland habitat, serious consideration should be given to providing it elsewhere within the IAMP area. If that is not possible, "offsite mitigation" as mentioned in paragraph 165 of the text must be actively considered. I represent that this needs to be clarified to ensure that any "offsite mitigation" does satisfy the Club's concerns. Birds such as Corn Bunting may already have been lost from this area but every effort should be made to halt the decline of species such as Yellowhammer, Grey Partridge, Tree Sparrow and Skylark to ensure that they do not suffer the same fate.

I note paragraph 169 of the text does include ponds as part of the description of green infrastructure. As it stands, Policy EN3 applies green infrastructure only to recreational use. I have referred to this in relation to that policy above, but in the light of the Club's comments regarding the wetland history of this area, represent that it is very important that ponds are provided that are suitable for wildlife (including waders), not just "recreational use". Indeed, in certain cases it may be necessary to restrict recreational use to permit wildlife to prosper as inappropriate recreational use would be in conflict with the conservation of breeding and wintering birds which are sensitive to disturbance. I refer to the reference to Barmston Pond in my Bird Club letter of 18 September and the reference there to the Club's book Birds of Durham which mentions the importance of this area for wading birds.

The Policy also makes no provision for raptors. As mentioned in my letter of September 2016, this area is surprisingly important for raptors including rare visitors. Whether this development will mean that, whatever is done, the area will cease to be attractive to them is a matter of conjecture but it is represented that provision should be made to encourage as many as possible of these species to use this area. Species such as Peregrine are becoming increasingly known as an urban species rather than an upland one and regularly nest on buildings. Planned buildings should include ledges where they can nest.

My Bird Club letter also referred to making provision for nesting opportunities for other birds on buildings, including hirundines (swallows and martins) and swifts.

In determining all this, the benefits of Natural Capital as mentioned in the Reports of that Committee should be considered and referred to in the text of the Plan. The economic and health benefits of Natural Capital need to be addressed.

I represent that all of these issues would be consistent with paragraph 109 of the NPPF as well as the social and environmental elements of sustainable development within paragraph 7 of the NPPF.

*Question 7.3 Does the plan provide adequate and soundly based guidance in respect of the role, protection and enhancement of the River Don corridor?*

I refer to my comments in my statement in relation to Matter 4 (Green Belt) and my response to Question 4.2 concerning the width of the proposed remnant of the Green Belt at this location. CPRE's Planning Campaign Briefing Note mentioned there and included in Appendix 1 to that statement. The Note refers to the now revoked PPG2 Green Belts of 1995 which stated that "Wherever practicable a Green Belt should be several miles wide, so as to ensure an appreciable open zone all round the built-up area concerned."

Clearly, in this case, it is not practicable to have a boundary that is "several miles wide" but I represent that the narrowness of the remnant Green Belt that will result should this Action Plan be adopted makes it even more important that the strongest possible protection must be applied to it.

One particular concern is the wording of Policy EN2ii which makes an exception for the proposed bridge over the River Don. While accepting that a bridge is necessary if the Plan is adopted to link the North and South parts of the development, this wording potentially means that the bridge could cut the river corridor in half as far as a passage for wildlife is concerned. While birds may not be directly affected by this, the Club represents that the bridge should leave a sufficient green corridor for wildlife to travel under it.

*Question 7.4 Does the plan provide for adequate monitoring of the ecological impacts of its implementation?*

I represent that it does not make such provision. Given the content of such documents as the State of Nature Reports, I represent that this is necessary to try to ensure that this development leads to an increase in biodiversity in this area and halts the declines highlighted in those reports.

*Question 7.5 Is policy EN4, in respect of amenity, soundly based? Is the modification of the policy as proposed by the Councils (Docs PSD6/PSD7) to extend its applicability to all proposed development in the plan area necessary for the plan to be sound?*

Neither CPRE NE nor Durham Bird Club made any representations on this proposed policy