



Tees Valley Nature Partnership

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Dear South Tees Development Corporation,

Response to the draft South Tees Regeneration Master Plan

We are the local nature partnership for the Tees Valley, one of 47 across England designated by the Secretary of State following the proposals in the Natural Environment White Paper (2011)¹ We link organisations in the Tees Valleys environmental, business and health and well-being sectors and work strategically to conserve and enhance a healthy and robust natural environment, proven to aid our well-being and provide the natural assets vital for a healthy economy.

Together with Your Tees (river) Catchment Partnership, we are the collective representatives with a considerable amount of expertise on nature conservation in our shared area. Between us we have a rich and diverse membership of over 40 organisations who range from regulatory authorities, charities, businesses, local authorities, local interest groups, local associations and universities.

Our partnerships are ambitions for the unique area of the Tees Estuary and are equally proud of our heritage of industry and nature conservation co-existing. We are encouraged by much of what is included in the draft Master Plan and are keen to work with you to realise the core principal 8 to create an internationally significant 'exemplar of how major industry and vitally important environmental assets can co-exist in a mutually-beneficial way, realised through genuine collaboration between new businesses and national and local environmental bodies'.

This concurs with the modern approach and commitment by central government to put 'natural capital at the centre of economic thinking and at the heart of the way we measure economic progress nationally.'¹ Theresa May states in The Clean Growth Strategy² that 'This Government is determined to leave our natural environment in a better condition than we found it. Clean growth is not an option, but a duty we owe to the next generation'. We anticipate these commitments will be developed further in the Government's forthcoming 25-year Environment Plan.

This approach was informed by Professor Lawton's widely accepted appraisal of the decline in our national wildlife. Despite losses 'we now have the opportunity to turn the tide and embrace a new, visionary restorative phase of nature conservation...The essence of what needs to be done to enhance the resilience and coherence of England's ecological network can be summarised in four words: more, bigger, better and joined.'³ These are now referred to as The Lawton Principles' and inform our approach to wildlife and nature across the Tees Valley.

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Our partnership priorities of specific relevance:

Priority 1: Protect and enhance the geodiversity and biodiversity of the Tees Valley ensuring the conservation, restoration and creation of key landscapes and habitats, including mitigating and adapting to the impacts of climate change.

Priority 2: Work at a landscape scale to restore and deliver robust ecological networks that demonstrate a wide range of environmental, social and economic outcomes.

Priority 4: Raise the profile of the Tees Valley as an attractive place to live, work or visit by championing the value and contribution of the natural environment through strong leadership, advice and support.

Priority 5: Seek positive outcomes for nature and the local economy by working closely with the economic sector, providing objective knowledge, expertise and advice.

Priority 7: Make positive contributions towards the health and wellbeing of local people by demonstrating the opportunities that better access to and use of the natural environment can provide.

Our key points on the draft South Tees Regeneration Master Plan:

- 1. Internationally important habitats.** We welcome the recognition by Ben Houchen, Tees Valley Mayor that 'The inclusion of important environmental and community assets at South Gare and Coatham Marshes also brings the potential for major enhancement of these areas of great natural beauty'. As areas of international wildlife importance, it is crucial the wildlife assets are protected above the desire to open up the area and create facilities that lead to greater disturbance by humans. This rationale is adopted in the draft Redcar and Cleveland Recreation Management Plan. In our highly managed and populated country we feel we have a duty to preserve the character and qualities of our wilder areas.
- 2. Community involvement** in our natural environment is critical for the appreciation and preservation of the environment and our health and wellbeing. We are confident that working with the STDC we can plan for and develop sustainable access to these areas as well as create exciting new opportunities in other appropriate areas of the site.
- 3. Whole Site** – the nature conservation value and interest doesn't stop at the Coastal Community Zone.
 - a. A Blue-Green Infrastructure Strategy** would incorporate the proposed open space strategy, sustainable transport and access, flood water management and SUDs⁴, and biodiversity strategy. This would have regard to the proposed environment strategy (energy, waste, air, water, land, pollution etc.).
 - b. Nature Improvement Areas** are nationally recognised landscape-scale initiatives which aim to ensure that land is used sustainably to achieve multiple benefits for people, wildlife and

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the local economy. 'Local nature partnerships and local planning authorities can identify and agree where locally determined NIAs can be set up'⁴. We are keen to explore this with you as an option to be the first in the country which is an industrial landscape.

- c. **A Biodiversity strategy** applying the Lawton principles with corresponding management plan is vital to ensure a comprehensive and coherent approach is taken now and into the medium and long-term future of the site. We recommend this is undertaken soon.
- d. Apply the **mitigation hierarchy** to achieve no net loss of biodiversity and net positive impact across the whole site. This is now widely accepted as the approach for biodiversity conservation for sustainable development.

4. Beyond the boundary

- a. **Credit system.** There are significant opportunities to include relevant parts of the STDC land-holding, within the boundary of the former steelworks site, in a Tees Habitat Banking system which is currently being developed by the Tees Estuary Partnership. Such a system will provide more clarity and certainty to commercial development, will simplify the planning process in relation to new development activity, and will provide an enhanced strategic network of habitat creation.
- b. **The Tees Estuary.** As a nature partnership we have great ambitions for the whole estuary area as a heritage asset to be enhanced and celebrated. This builds on existing successful programmes such as the Landscape Partnership River Tees Rediscovered. This STDC site has a key part to play and we hope you can be an active part of these wider ambitions. Our estuary and the river are the defining natural assets in the Tees Valley. We would like this east west corridor given equal status to the north south (CCZ) corridor.
- c. **Recreation and access.** Balance public access with site sensitivity.
- d. **Wider connectivity.** The proposed extension to the SSSI that links the CCZ south to Redcar rocks and beach, Coatham Marsh and Coatham Green and north beyond Hartlepool Headland to Hart Warren in a continuous stretch of protected coast.
- e. **Placemaking and public perception.** The Green Spaces Strategy can (should?) be built upon the existing built and natural heritage of the site. There are already national and international examples of business zones and parks that have embraced the natural environment and see it as an asset and integral part of the offering to business who wish to locate there. We can be an exemplar and grow our community pride in both the industrial and natural heritage of the Tees Valley as encapsulated in this site.

5. **Design and layout,** build the spatial plan up from the natural assets and public access opportunities in and adjacent to the site. The natural assets can inform and help determine the 'layout geared to encouraging integration over separation or segregation'. By taking this approach less sensitive areas can be prioritised, nature can be incorporated into site development plans and developed to enhance the setting of businesses and costly mitigation measures can be avoided or limited. Particular regard needs to be paid to:

- a. **Coastal Community Zone.** We are keen to see the boundary with the adjacent Northern Zone soften to reflect the habitats on the ground rather than the hard feature of the road. This could extend the area and allow a suitable 'buffer zone'. We believe the area of the Northern Zone is large enough to accommodate such as proposal. There is an opportunity here too to create a better more welcoming access point to the area. (we have already mentioned issues with disturbance earlier). Considerable habitat improvement can be made



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too for example; restoring the ponds (now drying up important for birds); better more vigilant protection of the potential little tern nesting site on the beach.

- b. **Northern Zone.** In addition to the CCZ, this area abuts Bran Sands, we would like to see a buffering zone behind the beach including the northern tip (identified on p57). The intertidal and subtidal areas including priority mudflats could be further enhanced here. The natural assets have the potential to make the setting to the proposed heritage site. The southern end of this large site has significant biodiversity interest
 - c. **North East Zone.** Perhaps the zone (other than CCZ) with the greatest amount of existing and potential biodiversity. The careful zoning of this site is critical for several reasons. Firstly, it can strengthen the link of Coatham Marsh to South Gare, secondly it has the best slag grassland site of the whole STDC site, thirdly it has the course of the Fleet including the historic medieval decoy pond transecting the site. These assets can help to enhance the setting of the proposed high-tech industries for this zone including opening up, redirecting and reprofiling the course of the Fleet. We would like to see any new construction concentrating around the area of the Steel House (the existing woodland is of far lower biodiversity interest than the grassland) and the south of the zone.
6. **Improving nature** can help achieve other objectives too including the public perception of the site, the potential local and national tourism offer and benefits to people's health and wellbeing.

Key opportunities (rather than constraints), across the site to start with:

1. **Tear-drop site.** This site within the NEZ has high biodiversity value with its slag grassland bisected by the course of the fleet. Careful attention needs to be given to the layout of any future developments.
2. **The Fleet water course.** Retain the historic decoy pond, reprofile and open the culverts. Make this an outstanding landscape and biodiversity feature.
3. **Estuary edges.** These are an increasingly rare, at risk and rapidly declining priority habitat. Enhancement opportunities are possible which will improve habitat connectivity.
4. **Ponds to north of blast furnace/behind dunes** are now drying up since operations have ceased. Work to these important habitats to prevent then drying up.
5. **Fully integrated SUDs⁴** across the whole of the STDC site.
6. **Retain undesignated sites which are of highest biodiversity value.** Designated sites are already noted within the plan as occurring within the CCZ. There are, however, areas of species-rich grassland and reedbed which are outside of the CCZ which merit retention due to their importance for wildlife in a regional context. These are currently not identified within the plan. Such land-holding could also be incorporated into the habitat banking process which is alluded to in section 4 earlier.
7. **Sea bird roost islands** off South Gare, roost sites for wading birds. These small island roost sites are currently eroding away there is an exciting relatively low-cost opportunity to create new ones.
8. **South Tees Investment Fund.** We are keen to see a proportion of this set aside for green infrastructure too. Such as setting up demonstration projects for developers to model, leverage or financial incentive to ensure developers contribute to the biodiversity strategy and management plan or direct investment in the environmental assets of the site that developers would not be able to or wish to contribute to. It is classically the 'softer' green

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infrastructure that often gets left to last or compromised in developments. We want to see this at the forefront of all developments across the STDC site.

9. **Design workshop.** We are keen to offer our expertise to help inform the layout of the zones, the whole site, blue-green infrastructure and green aspects of the buildings themselves.

This is our collective response; a number of our partners are providing an additional response on behalf of their organisations. We would encourage strategic dialogue regarding nature and the environment comes through the partnership whilst detailed and through work can be picked up by individual partner organisations.

We will address the South Tees SPD directly in the new year when the HRA assessment of the plan goes out for consultation.

In conclusion we are keen to start a constructive dialogue with you as soon as possible. May I suggest an initial meeting with key partners and a briefing at our next partnership meeting on the 20th December. We look forward to working with you to help realise an internationally significant exemplar site.

Yours sincerely,

Timothy Crawshaw, BA(Hons) MA MRTPI FRSA AoU
Chair, Tees Valley Nature Partnership

End Notes:

¹[The Natural Choice: Securing the Value of Nature](#) – Government White paper 2011

² [HM Government The Clean Growth Strategy](#)

³Lawton JH, Brotherton PNM, Brown VK et al. (2010) [Making Space for Nature: A review of England's wildlife sites and ecological network](#). Report to Defra

³ [Criteria for Local Authorities, Local Nature Partnerships and others to apply when identifying Nature Improvement Areas. Nature Improvement Areas: about the programme](#)

⁴ [Tees Valley Authorities Local Standards for Sustainable Drainage](#)

[Tees Valley Green Infrastructure Strategy](#)

[Biodiversity 2020: A strategy for England's wildlife and ecosystem services](#) 2011

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