

**Supporting Representation: Green Infrastructure Strategy** 

**July 2016** 

# **Issue Sheet**

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## 1 Introduction and Background

#### 1.1 Instruction

- 1.1.1 Lanpro Services have been instructed to promote 18 strategic sites through the Greater Norwich Local Plan process.
- 1.1.2 As part of this instruction Lanpro Services have prepared separate representations on each site, however it was considered beneficial to also provide an overview of the strategic green infrastructure theme which has driven the identification and design of the sites.

### 1.2 Natural Environment and Rural Communities Act (2006)

- 1.2.1 Section 40 of the Natural Environment and Rural Communities Act 2006, places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity. A key purpose of this duty is to embed consideration of biodiversity as an integral part of policy and decision making throughout the public sector.
- 1.2.2 Section 40(1) imposes a duty to conserve biodiversity:

Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.

1.2.3 Section 40(3) of the Act explains that:

Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.

1.2.4 Therefore, the duty applies to all local authorities and extends beyond just conserving what is already there to carrying out, supporting and requiring actions that may also restore or enhance biodiversity.

# 1.3 Natural England 'Nature Nearby' Accessible Natural Greenspace Guidance (2010)

- 1.3.1 Released in 2010, Natural England's most up to date advice on accessible natural greenspace, this document detailed the social, economic and environmental importance of providing GI.
- 1.3.2 Natural England recognised that access to the natural environment through local green spaces varies widely across the country, and even within a single local authority area.
- 1.3.3 Natural England produced Accessible Natural Greenspace Standards (ANGSt) which it advised should be adopted by Local Authorities. It was envisaged that the adoption of ANGSt would redress imbalances in GI availability in local communities.
- 1.3.4 ANGSt recommends that everyone, wherever they live, should have an accessible natural greenspace:
  - of at least 2 hectares in size, no more than 300 metres (5 minutes walk) from home;
  - at least one accessible 20 hectare site within two kilometres of home;
  - one accessible 100 hectare site within five kilometres of home; and
  - one accessible 500 hectare site within ten kilometres of home; plus
  - a minimum of one hectare of statutory Local Nature Reserves per thousand population.

#### 1.4 The Natural Environment White Paper (2011)

1.4.1 The Government's Natural Environment White Paper, The Natural Choice: Securing the Value of Nature, refers to the role of planning in protecting and improving the natural environment and facilitating coherent and resilient ecological networks that reflect the value of natural systems.

- 1.4.2 Planning is considered to be a key element of the institutional framework that will achieve the objectives set out in the White Paper. The aims of the White Paper include halting biodiversity loss by 2020, supporting 'healthy functioning ecosystems', and establishing 'coherent ecological networks'.
- 1.4.3 The White Paper refers to the role of urban GI as completing 'the links in our national ecological network' and 'one of the most effective tools available to us in managing environmental risks such as flooding and heat waves'. It advocates that green spaces should be factored into the development of all communities.

### 1.5 DEFRA - Biodiversity 2020 (2011)

- 1.5.1 Department for Environment, Food and Rural Affairs (DEFRA) Biodiversity 2020 is a national strategy for England's wildlife and ecosystem services; it was published in summer 2011. It sets out the Government's ambition to halt overall loss of England's biodiversity by 2020, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.
- 1.5.2 The reform of the planning system was identified as key to reducing environmental pressure from planning and development, by taking 'a strategic approach to planning for nature' and by retaining 'the protection and improvement of the natural environment as core objectives of the planning system'. Priority action 3.4 of the Biodiversity Strategy sets out how the approach of the planning system will guide development to the best location, encourage greener design, and enhance natural networks.

#### 1.6 NPPF (2012) and PPG

- 1.6.1 Central Government planning guidance contained in the NPPF advises that there are three dimensions to sustainable development; economic, social and environmental. The key to providing sustainable development is to ensure that all three are considered within planning decisions and plan making.
- The NPPF (paras 6 and 17) identifies sustainable development as the purpose of the planning system and conserving and enhancing the natural environment as a 'core planning principle'. While specific policies on conserving and enhancing the natural environment are addressed in Section 11 of the NPPF, these should not be considered in isolation, as other natural environment related policies, and their consideration in plan and decision-making, can be found throughout the document, specifically in relation to GI (para. 99) and evidence-gathering (paras 165-168).
- 1.6.3 Paragraph 9 of the NPPF advises that pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):
  - making it easier for jobs to be created in cities, towns and villages;
  - moving from a net loss of bio-diversity to achieving net gains for nature;
  - replacing poor design with better design;
  - improving the conditions in which people live, work, travel and take leisure; and
  - widening the choice of high quality homes.
- 1.6.4 The objectives for the natural environment within the planning system are set out in the NPPF (in para. 109) and state that the 'planning system should contribute to and enhance the natural and local environment by:
  - protecting and enhancing valued landscapes, geological conservation interests and soils;
  - recognising the wider benefits of ecosystem services;

- minimising impacts on biodiversity and providing net gains in biodiversity where
  possible, contributing to the Government's commitment to halt the overall decline in
  biodiversity, including by establishing coherent ecological networks that are more
  resilient to current and future pressures;
- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- The NPPF clearly supports the objectives set out in the Natural Environment White Paper by stressing a proactive and strategic approach to planning for the natural environment. The ambition of the NPPF is not just to retain protection for existing designations, but to plan ahead for re-creation of habitat where possible. The NPPF states (para. 114) that local planning authorities should 'set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'.
- 1.6.6 Furthermore, the NPPF requires local authorities to 'plan for biodiversity at a landscape scale across local authority boundaries' and 'identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation' (para. 117).
- 1.6.7 The NPPF and Planning Practice Guidance define Green Infrastructure (GI) as a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
- 1.6.8 Green Infrastructure (GI) is therefore an integral part of the sustainable development goal. GI ensures that there are net gains for biodiversity and that conditions are improved for leisure.
- 1.6.9 The creation of, and protection of, existing high quality publically accessible GI also adds value to the attractiveness of a location for business investment and for house builders.
- 1.6.10 It is a key requirement of the NPPF for Local Authorities to consider the role of GI within their plan making and decision taking; failure to do so would result in outcomes which could not be considered as sustainable development.
- 1.6.11 The NPPF is the first part of the planning vehicle to implement the requirements of Section 40 of the Natural Environment and Rural Communities Act 2006 and the aims of The Natural Environment White Paper (2011).
- 1.6.12 To find any part of a Development Plan sound it must fully reflect the policies of the NPPF. Therefore, GI and biodiversity requirements need to be filtered through to Local Authority development plan documents and act as a core consideration within decision taking and plan making.
- 1.6.13 The National Planning Policy Guidance (NPPG) defines Green Infrastructure as:
  - .....a network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
  - Green infrastructure is not simply an alternative description for conventional open space. As a network it includes parks, open spaces, playing fields, woodlands, but also street trees, allotments and private gardens. It can also include streams, canals and other water bodies and features such as green roofs and walls.
- 1.6.14 The NPPG highlights that Green Infrastructure is important to the delivery of high quality sustainable development, alongside other forms of infrastructure such as transport, energy, waste and water.

- 1.6.15 Green Infrastructure is also recognised in the NPPG as providing multiple benefits, notably ecosystem services, at a range of scales, derived from natural systems and processes, for the individual, for society, the economy and the environment.
- 1.6.16 Furthermore the NPPG advises that to ensure that these benefits are delivered, green infrastructure must be well planned, designed and maintained. Green Infrastructure should, therefore, be a key consideration in both local plans and planning decisions.
- 1.6.17 The NPPG provides further clarification on how successful GI can help to deliver wider planning policy:

#### Building a strong, competitive economy

Green infrastructure can drive economic growth and regeneration, helping to create high quality environments which are attractive to businesses and investors.

#### Delivering a wide choice of high quality homes

Green infrastructure can help deliver quality of life and provide opportunities for recreation, social interaction and play in new and existing neighbourhoods. More broadly, green infrastructure exists within a wider landscape context and can reinforce and enhance local landscape character, contributing to a sense of place. Green infrastructure is also an important approach to delivering ecosystem services and ecological networks.

#### Requiring good design

Well-designed green infrastructure helps create a sense of place by responding to, and enhancing, local landscape character. Green infrastructure can also help create safe and accessible environments in new development and the regeneration of brownfield sites in existing built up areas.

#### Promoting healthy communities

Green infrastructure can improve public health and community wellbeing by improving environmental quality, providing opportunities for recreation and exercise and delivering mental and physical health benefits. Green infrastructure also helps reduce air pollution, noise and the impacts of extreme heat and extreme rainfall events.

#### Meeting the challenge of climate change, flooding and coastal change

Green infrastructure can help urban, rural and coastal communities mitigate the risks associated with climate change and adapt to its impacts by storing carbon; improving drainage (including the use of sustainable drainage systems) and managing flooding and water resources; improving water quality; reducing the urban heat-island effect and; where appropriate, supporting adaptive management in coastal areas. Green infrastructure networks also help species adapt to climate change by providing opportunities for movement.

#### Conserving and enhancing the natural environment

The components of green infrastructure exist within the wider landscape context and should enhance local landscape character and contribute to place-making. High quality networks of multifunctional green infrastructure provide a range of ecosystem services and can make a significant contribution to halting the decline in biodiversity.

#### 2 Growth Considerations

#### 2.1 SHMA

2.1.1 The Central Norfolk Strategic Housing Market Assessment (SHMA) issued in December 2015 identifies a Core Housing Market Area, a Greater Norwich Housing Market Area and a Central Norfolk Housing Market Area.

- 2.1.2 The SHMA identifies the objectively assessed need for the partner councils until 2036, ten years beyond the current JCS period.
- 2.1.3 The JCS required for 37,000 homes to be provided by 2026. The SHMA advises that a further 15,000 dwellings will be required between 2026 and 2036 within the districts of Norwich, South Norfolk and Broadland.
- 2.1.4 North Norfolk and Breckland Council are currently in the early stages of their Local Plan process, their plan periods will run from 2012 until 2036. The SHMA advises that the growth required in those districts will be circa 25,000 dwellings in that period.

#### 2.2 Natura 2000 sites

- 2.2.1 Natura 2000 sites are considered to be Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and RAMSAR sites (internationally important wetland sites). It is a requirement of the Sustainability Appraisal, Habitats Regulations Assessment and Appropriate Assessment to considered the direct and indirect effects of population growth upon the integrity of these sites.
- A major consideration of population growth is the visitor pressures placed on publically accessible Natura 2000 sites. These recreational pressures have been considered previously through the adoption of the JCS and the Norwich, South Norfolk and Broadland Council Local Plans. Many of the Natura 2000 sites had been scoped out through the sustainability appraisal scoping process as unlikely to be detrimentally impacted upon by the growth projections.
- 2.2.3 On-site open space provision, delivery of strategic GI through investment and specific allocations such as South Norfolk's Bawburgh Lakes site had been considered sufficient to mitigate against any impacts which were considered possible on those vulnerable Natura 2000 sites.
- In Broadland the onsite open space policy requirements are considered by many developers to be onerous and at risk of making schemes unviable. The open space requirements which the Council are seeking are a direct result of concerns raised by Natural England regarding impacts on Natura 2000 sites.
- 2.2.5 South Norfolk Council are reliant on a strategy of creating access to the open countryside to ensure that population pressures do not impact negatively on protected sites. This strategy does not take into account that the open countryside is out of their control in terms of accessibility and quality of recreational standard, it also assumes that the average resident is fully aware of the rural footpath network. It should also be noted that the delivery of circa 70ha of publically accessible open space at the Bawburgh Lakes site has not made any progress in over ten years.
- 2.2.6 The strategies detailed above were devised to ensure that the Natura 2000 sites which had not been scoped out from the relevant sustainability appraisals would be protected. However, it is unclear if the scoping exercise undertaken by the Councils took account of the existing deficiency in natural and semi natural public open space which was evidenced in each Councils PPG17 study from 2007.
- 2.2.7 For example, the South Norfolk PPG17 study found that there were large scale deficiencies in the supply of publically accessible Natural and Semi-Natural Greenspace, specifically 200ha in the north west and south west of the District
- 2.2.8 The sustainability appraisal Scoping Report which accompanies the Call for Sites provides an understanding that there is a need to protect and enhance nationally and internationally protected nature conservation interests and geodiversity sites in and adjacent to the area, with particular emphasis on reducing visitor pressure on and improving water quality in Natura 2000 sites and the wider habitats of the Broads.
- 2.2.9 However, the scoping report repeats the oversight of the previous SA's undertaken for the Local Plan process. There is no acknowledgement that the visitor pressures from new development could be occurring because there is insufficient alternative natural greenspace available on site or close to their site due to the delivery of strategic GI not coming forward. This would

compound the evidenced existing problem of open space deficiencies which have not been identified or addressed correctly through the JCS, South Norfolk Local Plan or Broadland Local Plan.

- 2.2.10 Councils are not supplying sufficient accessible natural greenspace with a variety of environments to satisfy the visitor demands on Natura 2000 sites; which will increase further due to the proposed growth between now and 2036.
- 2.2.11 Therefore, it is considered that the scoping of impacts upon the Natura 2000 sites through the Appropriate Assessment, Sustainability Appraisal and Habitats Regulations Assessment needs to demonstrate that there is an understanding of the current open space deficiencies to ensure that the in combination effects of the projected growth plans are fully understood.

#### **2.3 SANG**

- 2.3.1 It is understood that Natural England consider there to be a 7.5km catchment area for publically accessible Natura 2000 sites. Therefore, increased visitor pressures which result from population growth within the 7.5km catchment area need to be considered within the scoping/sustainability exercise which accompanies the next iteration of the plan making process.
- 2.3.2 At present the spatial distribution of the projected growth is not fixed however what is known is that the designated sites have a catchment area which spreads across the majority of the three partner Council's areas.
- 2.3.3 Given the existing deficit in publically accessible natural and semi natural open space within Broadland and South Norfolk, the unsustainable/undeliverable mitigation being promoted through the respective Local Plans and the projected growth of the SHMA Councils it is apparent that suitable alternative natural greenspace (SANG) will need to be sought to avoid negative impacts being experienced at Natura 2000 sites.
- 2.3.4 The need for a variety of SANG's to be provided can be traced back to the evidence of the PPG17 studies carried out by the respective Council partners. These studies detailed that a range of opens spaces of natural and semi-natural open space needed to be provided for the district Councils to meet Natural England's ANGST recommendations.
- 2.3.5 These new spaces need to offer a variety of environments, provide for a range of walks, allow for car parking at the larger sites, and be located within the 7.5km Natura 2000 catchment area to provide for a successful SANG.
- 2.3.6 The long term management of the SANG can be offered to a variety of interested bodies ie Parish Council, District Council or Norfolk Wildlife Trust or it could be through a private management agreement.

# 3 Proposed Sites

# 3.1 Strategic Locations

- 3.1.1 Lanpro have been working with our clients to identify and secure sites which are within and adjacent to the NPA. These sites have been identified as they are within the buffer zone of the Norfolk Natura 2000 sites, they provide connections/enhancements to the JCS identified GI corridors and they are within easy reach of growth locations.
- 3.1.2 The mapping exercise which we have undertaken shows the quantum of GI which we are offering to act as SANG's in or adjacent to strategic growth locations. We would anticipate that these same locations will experience more growth through the new Greater Norwich Local Plan.
- 3.1.3 The plans detail clearly that all of our promoted sites are within the Natura 2000 buffer zones and when compared to the JCS Key diagram and GI corridor maps our sites have the potential to offer a range of opportunities for the Greater Norwich Local Plan.

#### 3.2 Sustainable Developments

- 3.2.1 The provision of high quality GI within each promoted site has been given careful consideration. The GI will act as a benefit for the development and the surrounding locality in terms of its use, but we have also given consideration to the form of the development and its interaction with the wider landscape setting and characteristics.
- 3.2.2 The provision of GI at a rate which may be higher than the current policy requirements provides for opportunities to create high quality design outcomes in built and natural form terms.
- 3.2.3 The quantum of housing proposed at each site is appropriate to the size of the settlement which it would be related to. The biodiversity benefits which could also be introduced would ensure that each development truly provided for a net gain for the natural environment.
- 3.2.4 The developments can provide social gains through increased recreational and sporting opportunities which also lead to social inclusion gains.
- 3.2.5 The NPPG recognises that the provision of high quality GI can result in economic benefits for an area as it attracts investment in both housing and business.
- 3.2.6 The provision of these sites as proposed will ensure that the future growth plans for the Greater Norwich area will be more resilient to the potential for recreational pressures to impact on vulnerable designated and non-designated sites. Across the 18 sites 143ha of public open space can be created.

#### 3.3 Deliverable and viable

- 3.3.1 As detailed on all of the separate submission forms we consider all of the promoted sites to be deliverable and viable. Detailed viability information can be provided but as stated in this representation previously Lanpro and their clients have identified and secured these promoted sites on the basis that the Greater Norwich area is in need of SANG's.
- 3.3.2 The majority of these sites can be taken forward immediately and the Greater Norwich Local Plan is therefore in a position to front load the provision of necessary GI to offset the recreational pressures which may occur through population growth, especially in the post 2026 period.

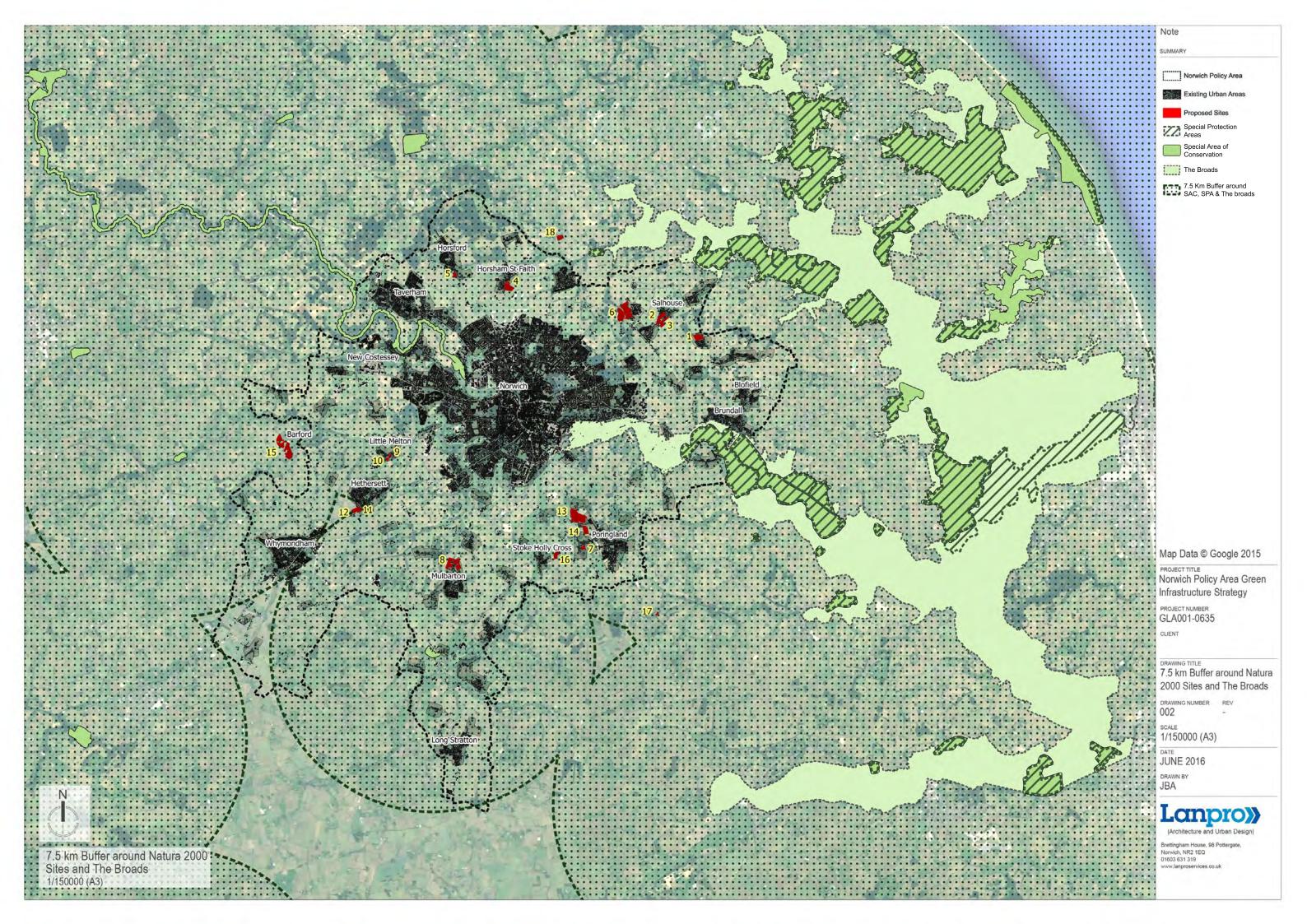
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Appendix 1 – Sites Location



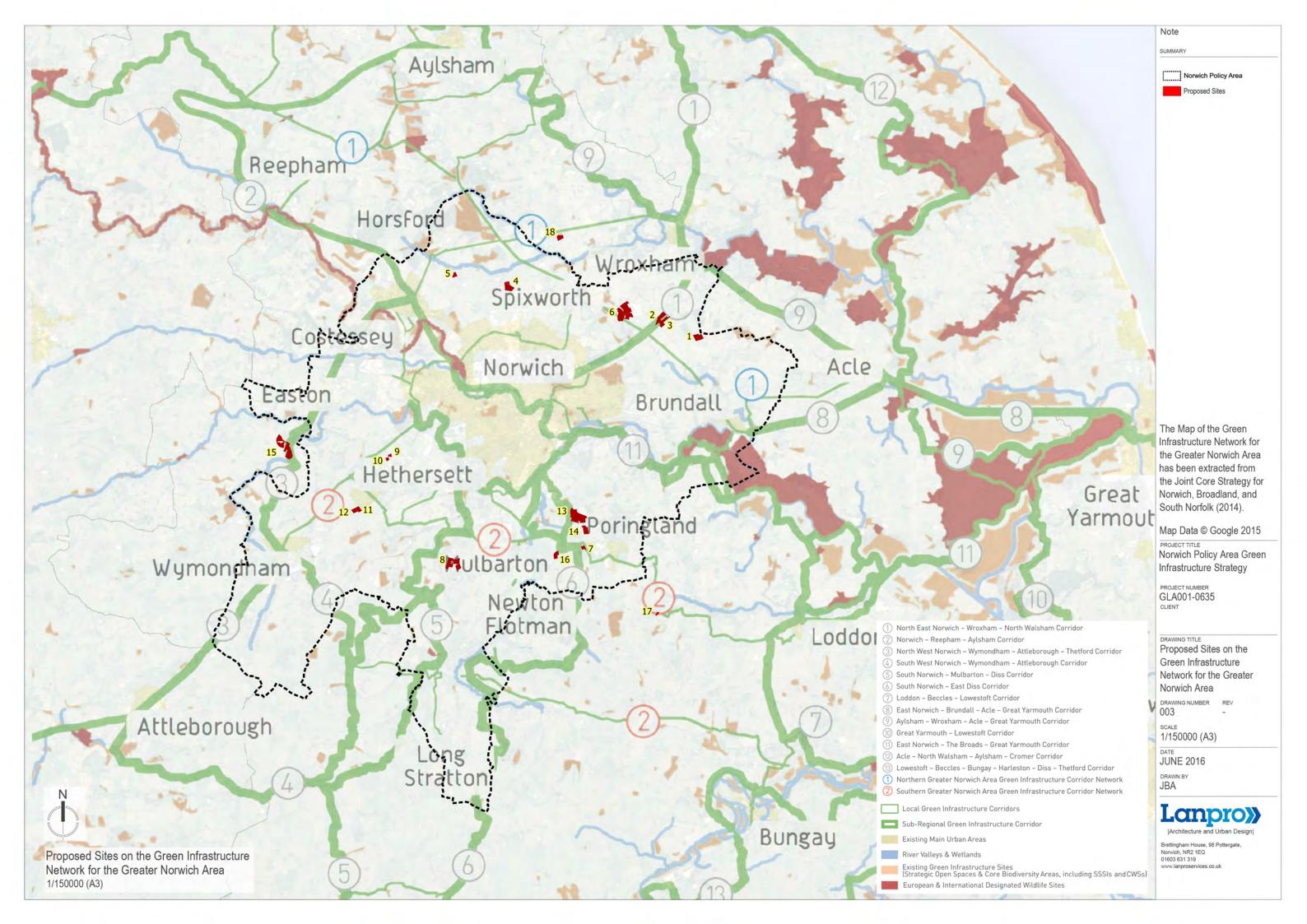
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Appendix 2 – 7.5 km Buffer around Natura 2000 Sites and The Broads



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Appendix 3 Proposed Sites on the GI Network for the Greater Norwich Area



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Appendix 4 Proposed Sites on the
JCS Key Diagram

