

Green Essex Strategy

Stakeholder Feedback from Colchester Borough Council – Catherine Bailey Planning Policy Officer June 17th 2019

Generally

Colchester Borough Council welcomes the Green Essex Strategy as a high-level approach to conserving and enhancing green infrastructure at the county level.

In formulating our response, we have identified a few key comments that address some generic issues that run through the document and its appendices as a whole and have then looked at the document page by page and commented on some of the detailed points.

Key Issues

1. Clarity is needed as to the purpose of the document in relation to district-level green infrastructure (GI) and open spaces strategies which form part of the local evidence base for the local plan and development management purposes, especially in relation to GI or open space standards. We would not want to face challenges from applicants if and where there are instances where it appears that there is ambiguity about a local standard.
2. Clarity is needed between the terms 'green infrastructure' 'greenspace' and 'open space'. All of these have developed established meanings through long use, including in the planning system, and diversion from established practice or tradition will likely cause confusion and error when the document comes into use. Within the strategy document there appears to be occasions when greenspace and GI are used interchangeably even though they have been defined in slightly different ways elsewhere. 'Open' space is commonly taken to mean accessible open space. It is not always clear if it is being used in that context in this strategy. Clarification should be provided as to when the strategy is talking about accessible and non-accessible assets. Not all GI is accessible by people but that does not mean it isn't important (e.g. for wildlife, landscape or heritage purposes).
3. Whilst we welcome the ideas on creating a Green Essex Partnership, further discussion would be needed about the Terms of Reference of such a group and its governance, especially in relation to bidding for and allocation of funds for projects.
4. The strategy is heavily weighted towards biodiversity objectives and actions and needs some counter-balancing with landscape and heritage actions, or explanation at the start of the document as to why the role of some green infrastructure assets has been identified as more important than others (and despite, for instance, landscape being seen as of importance to district authorities in the consultation process).
5. The document requires a thorough grammar and spellcheck as, for example, there are some confusing instances of full-stops followed by the conjunction 'While' which do not make grammatical sense.

Detailed comments

Main Document

Introduction - Page 6 – Clarify if this document addresses strategic level GI primarily or exclusively.

Partnership/Steering Group – Governance and Terms of Reference very important. Local members and communities may not want to cede responsibility for making local bids for local projects.

Vision – Page 8 – grammatical error

Objectives - Page 9 – Economy - I would suggest this is more accurately described as ‘Funding’ not ‘Economy’ as that is all that is being identified. ‘Economy’ would need to acknowledge the net gain to the economy in terms of natural capital/ecosystem services that the infrastructure provides not just the implied cost/deficit in maintaining or enhancing the network. Additionally, the potential job creation, income generation etc. of the assets need to be factored in.

Assets - Page 11 – the term ‘open’ space has an assumed meaning in planning terms of being publicly accessible which not all natural and semi natural greenspace nor space around educational buildings will be. I would suggest the Strategy sticks to the more usual term of ‘greenspace’ in order to avoid confusion.

Figure 1 – Page 12 – this needs to clarify that it does not include a Public Realm nor the agricultural/productive land GI dataset.

Elements - Page 13 – In the asset list on Page 11, Productive Land is included as a sub-set of Green Infrastructure. However, in Table 1 it is implied that it isn't. In addition there appears to be a tendency to use the terms greenspace and green infrastructure interchangeably when they are not identical. This needs clarifying.

Landscape – Page 13 - the section on ‘Landscape’ is insufficient; it refers to agriculture and wildlife but not landscape character, distinctiveness, beauty, AONBs etc. despite the latter being a landscape designation not a wildlife one. It should reference Natural England's National Character Areas and flag up that each local authority has its own local level Landscape Character Assessment.

Natural Environment - page 13 – Remove AONB and place under Landscape.

Historic environment – Page 14 - reference to soils and geology should be in Natural Environment section not Historic Environment.

Figure 2/3 - Page 15/16 – The typology of ‘greenspaces’ overlaps the typologies of ‘Green Infrastructure’ identified in Figure 1. The text/captions need to be clear that ‘greenspace’ is a sub-set of GI and how they differ (appears to not include ‘productive land’ or ‘Public Realm’??). The terms should not be used interchangeably.

NPPF - Page 19 – line 8 should read ‘deliver’ not ‘delivery’. Add valued landscapes and the intrinsic character and beauty of the countryside as features to be protected.

Drivers - Page 23 – explicitly identifies ‘landscape character’ as a cross over key priority emerging from local authority GI studies and yet this is not followed through in this document.

Why invest? - Page 29 - The economic benefits identified in this section need to feed back into the ‘Objectives’ and ‘Actions’.

Functions and Benefits - Page 30 – Add landscape to the list with ‘Heritage and Cultural Assets’.

Figure 5 – Page 31 - It needs clarifying if this figure is based on the ten functions listed on Page 30. Most of the Productive (i.e. agricultural) Landscapes appear not to be highlighted as having function.

Benefits - Page 32 – ‘Landscape’ and ‘Intrinsic character and beauty’ need to be added as environmental benefits. Social benefits – Suggest use of the term ‘Sense of Place’ not ‘Quality of Place’. The former implies recognition of intrinsic character and distinctiveness whilst the latter suggests that the condition and value of a place are its central assets. Education and connection are benefits that apply also to heritage, culture and landscape not just nature. The text should be amended to reflect this. The benefits listed on Page 32 do not tie up with the benefits identified in the case studies e.g. page 34 ‘Abberton’ lists landscape under environmental benefits, but landscape does not appear as a benefit option in the list on page 32. Also ‘Social Benefits’ identifies ‘Quality of the Place’ as a benefit in the Page 32 list but ‘Sense of Place’ (the better term) in the Case Study. These anomalies need correcting.

Project Delivery: Place– Protect Page 38- Review of existing designations.

As local landscapes are generally no longer protected by local designation in local plans, any review of local designations also needs to include review of local landscape character assessment and recognition of landscapes of strong character or high value at the local level. Landscape character assessments are used to underpin local policies around landscape and countryside conservation and enhancement in Local Plans and so are of vital importance in the conservation of rural green infrastructure networks and historic and productive landscapes outside of designated wildlife sites. There appear to be no objectives specifically around ‘heritage’ under ‘Place’ which needs remedying. The objective ‘Embed an ‘environmental net gain’ principle for development, including housing and infrastructure’ is supported but not a requirement within the current NPPF, although it is proposed in the 25 Year Environment Plan. This objective can be encourage but may be hard to enforce through the planning system at the current time.

Place – Improve - Page 38 – use of locally native species is not always suitable or sufficient in urban areas. Wildlife friendly ornamental species should also be promoted within these areas. ‘Visitor Centres’ are more about benefits to ‘People’ and ‘Economy’ rather than ‘Place’ and would be better placed in one or other of these sections accordingly.

Place – Create – Page 38 Suggest use of term ‘Establish’ rather than ‘Develop’ throughout this section as ‘Develop’ has implications within the planning system. Address lack of landscape objectives by adding ‘Strategically identify priority areas for the creation or improvement of green infrastructure to enhance local landscape character’. ‘Outdoor Pursuit Centres’ are more appropriately placed in the ‘People’ section not ‘Place’. Outdoor pursuits are rarely ‘Place’ dependant. The objective ‘Create town or village circular walks especially in areas of green infrastructure deficiency’ appears twice in the same section. Suggest delete duplicate. Add an objective around supporting the delivery of conservation, enhancement, creation and access to green infrastructure e.g. through the use of current and future Rural Development Programme schemes including ‘Environmental Stewardship’ and successor post-Brexit schemes.

Place – Connectivity - Page 39 ‘Connectivity’ in green infrastructure terms is not just about connectivity for people but also connectivity in landscape character and wildlife terms too. Suggest use of term ‘Establish’ rather than ‘Develop’ throughout this section as ‘Develop’ has implications in planning terms.

People - Inclusivity – Page 39 this needs to include creative outdoor activities to address cultural and spiritual health not just vigorous, physical activity which is not appropriate or necessarily wanted by key groups of people e.g. older people. Add examples of cultural activities to the example list.

Economy – Sustainability – Page 39 Sustainability by definition isn't just about economics but encompasses environmental and social objectives too. Change to 'sustainable funding' to clarify. 'Economy' is also about job creation so identify an action about GI creation and enhancement supporting creation or sustaining of jobs e.g. wood fuel use and management. Propose also to add in an action to identify (at either a county or individual district level) the natural capital or ecosystems services value of GI, not just what and where it is. We need to promote the fact that GI saves and generates funding through providing ecosystem services or natural capital benefits and is not a net drain on resources.

Marketing, branding etc. – Page 41 – suggest 'Green Essex' is a web-based brand and tool where local authorities, third parties etc. can form local partnerships and chase funding, best practice, national policy and guidance. Suggest there isn't a need for a prescriptive marketing strategy or pan-Essex brand on the ground as many local authorities have their own local identities (in Colchester we have just developed an identify for local circular walk 'Colchester 'Orbital') but there could be a Green Essex kitemark or similar to reward best practice at a local level. Suggest promoting best practice via the website with both a Members section for local authorities, stakeholder partners e.g. EWT but also public-facing pages for the general public living among or visiting the Green Essex resources. There is confusion of terms again between green space and green infrastructure – this needs clarifying.

Page 42 – Suggest should be a 'Green Essex' not 'Green Infrastructure' information portal as it is more user friendly among a bigger audience-base.

Re-designation - Page 43 – Local authorities already review their Local Wildlife Sites as part of Local Plan and evidence base reviews. Many districts have Green Infrastructure Strategies, and this is supported through the NPPF. Landscape Character Assessment review is needed in some Essex districts in order to ensure the character and distinctiveness of differing landscapes and their features, most of which form key elements of GI networks, are understood in the current planning and development context. This approach to landscape survey and conservation is supported in the NPPF. The designation of Local Nature Reserves has become difficult with budget constraints as this requires a local authority to have control of the LNR land either through ownership, a lease or an agreement with the owner and an ongoing responsibility for its care or protection. Many borough/district level authorities do not have the appropriate staff resource to care for these features. There remain opportunities through planning gain linked to Biodiversity Net Gain and also RAMS payments to create and manage future LNRs created as part of off-setting schemes, managed by third party experts such as Essex Wildlife Trust or the Lands Trust. Colchester Borough Council would be supportive of discussions on creation of a partnership to explore best practice and governance for creating and managing such features in the long term.

Environment Net Gain – Page 44 – Same comment as before. The objective to 'Embed an 'environmental net gain' principle for development, including housing and infrastructure' is currently supported by the NPPF, but not mandatory and therefore hard to enforce through the planning system.

Principles - Page 62 and 64 – the principles in these sections should signpost landscape and heritage in some way.

Highways - Page 71– To the sentence ‘Our transport network is essential to economic growth but also contributes to poor air quality through the vehicles using our roads. It impacts on biodiversity...’ add ‘landscape and heritage’ as well. To the function ‘Integration of transport and green infrastructure may enhance scenic value and connectivity...’. add ‘Landscape character’ after scenic value as well.

Greenways - Page 74 – To ‘It impacts on biodiversity...’ add ‘landscape and heritage’ as well. To ‘Integration of transport and green infrastructure may enhance scenic value...’ add ‘landscape character’ before ‘... and connectivity resulting in increased benefits from leisure and tourism’.

Coast – Page 76 – flag up the importance of the perceptual and cultural qualities of the coastal landscape, not just biodiversity, that form part of the ecosystem services it delivers.

SuDS – Page 78 – NPPF paragraph 163 is clear that ‘Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate’. i.e. SuDS are already a national planning policy requirement on major development sites.

Agriculture – Page 86 – Add in references to landscape conservation and protection of the historic environment both of which are key assets of rural green infrastructure and both of which can be eligible for environmental stewardship funding and which fall within ‘Enhanced beauty, heritage and engagement with the natural environment’ in the 25 Year Plan.

The statement about the EU that states, ‘Especially with the potential opportunities that could be presented from the withdrawal from the European Union’s Common Agricultural Policy (CAP), that originally decided how the land is farmed, food is grown and the state of the natural environment’, could be mis-leading as the EU and the CAP doesn’t decide directly what’s grown by farmers in the UK, but does govern the financial support or market interventions that certain crops and practices receive. It is optional for landowners and farmers to take up these subsidies and support. It is likely that some market intervention will remain, particularly in the short-term, after we leave the EU to avert an exodus of farmers from the countryside or destruction of livestock due to price collapse.

Governance and Terms of Reference Page 93 - very important. Local members and communities may not want to cede responsibility for making local funding bids for local projects.

Action Plan – Page 97 – Some concerns regarding these actions have already been flagged in earlier comments. These may be reiterated and/or added to below. The actions are heavily weighted towards nature conservation and need balancing with landscape, urban character and heritage projects.

Protect Page 97 – Marketing/branding – must not be prescriptive and must work alongside local brands. Suggest a ‘Kitemark’ approach instead. The use of the term ‘valuable’ is a loaded term, especially in relation to landscapes. If it is meant in terms of eco-system services at a strategic level, then this should be made clear. Otherwise drop the term ‘valuable’ and just refer to green infrastructure overall.

Designation/redesignation – landscapes are not designated at a local level, so landscape character assessments should be used to determine landscapes of strong character or high value at a local level. Landscape is an important determinant of natural beauty and cultural capital, as well as contributing to the historic environment as part of ecosystem services and should be included in any valuation process. As should agricultural land through Best and Most versatile Land analysis.

Environmental Net Gain – see previous comments.

Green Essex Network – Needs to engage GI and Landscape Planners too who are writing and delivering planning policy and development management that will help create future net gains.

Improve Page 98/99– needs to recognise the role of farmers and other landowners in delivering landscape, biodiversity, heritage and access enhancements through existing and potential future environmental stewardship programmes. Action needed to support/work with the relevant bodies i.e. EA, NFU, CLA, MOD, EH etc.

Management of green infrastructure – locally native species need not be the sole solution in habitat creation and enhancement, except in the rural environment; otherwise species selection in urban areas and new developments needs balancing with other attributes such as visual quality, scent, size, all year interest, autumn colour etc.. Many ornamental species have excellent biodiversity benefits e.g. lavender, Buddleia etc.

Create Page 100/101-

New developments – Create links to Best Practice for GI via a Green Essex website.

Add Natural Flood Management – delivery through development management on major development sites

Biodiversity Net Gain – if proposing multi-functional greenspace on/offsite as part of Biodiversity Net Gain, this should deliver for people as well as biodiversity e.g. access, play, amenity, design etc. to be fully multi-functional

Connectivity Page 102 – balance actions for access with those for landscape and wildlife connectivity.

Inclusivity Page 102 – balance action for young people with those for other hard-to reach groups e.g. older people, less able, BAME. Balance active recreation with cultural activities.

Executive Summary – this is far too long for an executive summary.

Appendices –

Environmental Character – As before the description under ‘Landscape’ is more about habitat and agricultural land quality than ‘Landscape’. This section (and where landscape is referenced elsewhere) should flag up the National Character Areas. Also, the AONBs should be flagged up in this section not in with Natural Areas. AONB is a landscape designation not a biodiversity one.

GI Types (Assets) - Parks and gardens – traditionally this typology does not include private domestic gardens. I would suggest this strategy adheres to the traditional green space classification to avoid confusion. Does this typology include Historic Parks and Gardens including those which aren’t publicly accessible?

Natural and semi-natural open space – ‘open’ in the context of greenspace implies publicly accessible. All woodlands, heathlands vacant/derelict land etc. are not necessarily publicly accessible, so I suggest dropping the term ‘open’ and replacing with ‘green’. Most natural and semi-natural greenspace is not involved in food production.

Green Corridors – these could also be Heritage and Cultural Assets

Outdoor sports facilities – If of grass, these also contribute to flood attenuation and water resource, and cooling effect. If bounded by trees (as many recreation grounds are) they also contribute to

pollution absorption and removal and habitat. They can also be Heritage or Cultural Assets e.g. Victory Recreation Ground Tollesbury.

Agricultural land etc. – not sure why these are identified as Green Travel Routes? Agricultural Land is also a Heritage and Cultural Asset in terms of historic landscape character, field boundaries, historic settlement patterns and heritage assets e.g. farm buildings.

Amenity Green Spaces – most of these are grass so contribute to flood attenuation and cooling effect.

Water bodies – some of these will be Cultural if not Heritage Assets.

Waterways – ditto e.g. The Chelmer and Blackwater Navigation in Maldon District

Greenways – ditto

Orchards etc. – ditto

Benefits – the list of ‘benefits’ on Page 32 in the main strategy does not correlate with the ‘benefits’ used in the case studies e.g. on Page 34, nor with the list of ‘Benefits’ used on Page 35 of the Appendices document. These discrepancies need reconciling. ‘Landscape’ should form one of the benefits as strength of landscape character is the major measure of landscape quality and condition used at a district planning level.

Chapter 8 – Benefits – this chapter introduces a different grouping of ‘benefits’ again from the groupings previously identified. These groupings largely omit landscape and heritage benefits. This needs reconciling and rectifying. Natural England’s NCA assessments include benefits from each NCA including those from the eastern region which may be useful.

Appendix 11 – the title of this is ambiguous. Which development sites are these?

Appendix 13 – Countryside Stewardship – I am confused by the statement ‘Utilise Countryside Stewardship to acquire new multi-use greenspace...’. Countryside Stewardship usually facilitates enhancements on agricultural or other rural private land for the benefit of wildlife, landscape, heritage etc. Can it be used to purchase land for amenity use?