



# Green Infrastructure Compendium

A collection of key GI comments to Planning Applications, associated planning documents and Local Plans

# Green Infrastructure Compendium

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## Preface or Purpose

In reviewing planning applications and related planning documents (such as environmental impact assessments or environment outcomes reports, SPDs, etc.), the Essex County Council GI Team made a variety of common green infrastructure (GI) comments and responses that are presented in this compendium. These comments and responses are aligned to the nine [Essex GI Principles and Standards](#). As well as important general remarks when examining the strength of policy wording and the coverage of GI throughout local plans.

This compendium aims to provide guidance, gathering key responses, and outlining clear expectations in order to assist local planning authorities in successfully securing and delivering high-quality GI from developments connecting to a wider GI/environmental network. This document is a collection, consolidation, and condensing of the collective knowledge of the ECC GI Team on high-quality GI infrastructure.



Figure 1: The Nine Essex GI Principles (*Essex Green Infrastructure Standards, 2022*)

## 1. How to use guide

The compendium has been prepared for Policy Planners and Development Management Planners of Local Planning Authorities in order to define a clear direction for existing and new developments in the delivery of GI and to provide certainty regarding what is expected in terms of design, quality, and function.

The contents table provides a clear list of the compendium's themes or topics relating to the GI comments (in alphabetical order) so that it is easy to dip in and out of them without having to read the entire thing from cover to cover.

The text in red within GI comments indicates where the consultee to amend with either name of the document reviewing (i.e., Design and Access Statement), name of the development or name of designated habitat/site or ancient woodland.

## 2. GI Comments Compilation for Development Management (Planning applications and associated planning documents)

### 2.1 Access & Public Rights of Way

ECCs GI team supports the retention of existing and the provision of new an access networks which encourages and supports active travel. Green infrastructure can be integrated along the network to enhance nature through the delivery of biodiversity net-gain, habitats, and green corridors. Therefore, ECCs GI team recommends that routes are designed to include wildlife corridors and stepping-stones GI features along sustainable transport routes such as paths, cycle, and bridleways.

### 2.2 Active Travel & Green Infrastructure

ECCs GI team supports the provision and protection of active travel and Public Right of Way (PRoW) networks. ECCs GI team recommends that **INSERT application/document/strategy** supports and encourages opportunities to enhance and establish green infrastructure along sustainable transport and PRoW networks to both encourage active travel and create a green corridor for wildlife. This could include, but not be limited to, the integration of nature focused SuDS; native hedgerows, tree and shrub planting; incidental ‘play on the way’ features / trails; informal sport (outdoor gym/fitness trails); and areas for seating to stop and rest.

### 2.3 Ancient Woodland

In terms of the **INSERT application/BOARDING ANCIENT WOODLAND**, paragraph 186(d) of the National Planning Policy Framework (NPPF) states that “*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists*”. ECCs GI team expects this ancient woodland to be protected. Developments that infringe upon these locations are expected to be designed to avoid detrimental direct and indirect impacts with the appropriate landscape buffers applied. This includes, risk of water-borne pollution, air pollution, dust deposit, change to local hydrology, increased recreational pressure and informal access points and soil compaction.

### 2.4 Biodiversity Credits (To be updated when more info is available)

A statutory biodiversity credits scheme is being established through developing a biodiversity credit investment pipeline and payment structures to fund habitat provision. Where developers can purchase the credits as a last resort if onsite and local offsite habitat provision cannot provide the required BNG. It is anticipated more information on the national biodiversity credits scheme to be made available Winter 2023. A potential biodiversity credit scheme for Essex is being explored.

### 2.5 Biodiversity Net-Gain

The following advice on Biodiversity Net-Gain is tailored to major and large sites (3.7.1), small-scale sites (3.7.2) and where the site BNG value is negligible (3.7.3).

### 2.5.1 Commercial Sites general text

With regard to the delivery of commercial developments, ECC GI team recommends that opportunities to promote biodiversity are explored as part of the design process. Biodiversity can be enhanced on development sites in a number of ways, including through the establishment of hedgerows, wildflower meadows, bird boxes, insect houses and ponds.

### 2.5.2 (Major and large sites over 0.5 ha or 5,000sqm+, 10+ dwellings)

The Environment Act identifies a minimum 10% gain required in biodiversity. The Environment Bill received Royal Assent on 9 November 2021, meaning it is now an Act of Parliament. Mandatory biodiversity net gain become law on 12 February 2024 and requires the following key components:

- *Minimum 10% gain required calculated using Biodiversity Metric and approval of net gain plan*
- *Habitat secured for at least 30 years via obligations/ conservation covenant*
- *Habitat can be delivered on-site, off-site or via statutory biodiversity credits*
- *There will be a national register for net gain delivery sites*
- *The mitigation hierarchy still applies of avoidance, mitigation and compensation for biodiversity loss*
- *Will also apply to Nationally Significant Infrastructure Projects (NSIPs)*
- *Does not apply to marine development*
- *Does not change existing legal environmental and wildlife protections*

The following guidance has already been produced to assist the calculation and delivery of biodiversity net gain:

- an updated [Statutory Biodiversity Metric](#) was published in November 2023.
- CIEEM, IEMA and CIRIA have set out Good Practice Principles for Development and an associated Practical Guide and Case Studies.
- a British Standard on biodiversity net gain and development projects: BS 8683:2021 Process for designing and implementing Biodiversity Net Gain

ECCs GI team expects this development site to deliver Biodiversity Net-Gain (BNG) in line with the Environment Act. The delivery of BNG is expected to take place on-site where possible, via the protection and retention of existing GI and provision of new features. However, it is recognised that this might not always be conceivable, and that off-site delivery could provide additional benefits and be used to protect areas of land that are of local natural and wildlife value.

2.5.3 For small scale sites (1-9 dwellings, sites area less than 0.5 ha or less than 5,000sqm or no priority habitat present within the development area (excluding hedgerows and arable margins)

The NPPF 2023 sets out that development should deliver measurable net gains in biodiversity. Paragraph 180 (d) states that developments should minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Due to the site area being less than 5,000sqm it is recommended that the [Small Sites Metric](#) – a simplified version of the Statutory Biodiversity Metric is applied to take biodiversity into account.

The Small Sites Metric are the standard methods for measuring biodiversity change which result from new development and will assist in demonstrating whether net gains in biodiversity have been achieved. The metrics are designed to quantify biodiversity to inform and improve planning, design and decision-making. They can support planning applications to calculate the losses and gains in biodiversity from their development.

2.5.4 Where the baseline biodiversity value is zero, e.g. in urban areas or small sites.

**2.5.4.1 When an application provides a large percentage increase in BNG**

ECCs GI team supports the ambition to deliver [i.e.1000%] net gain, where the site baseline biodiversity value is negligible/ zero. In this case it is recommended to calculate any biodiversity unit gains as a numerical unit value as opposed to a percentage. It is recommended that a site with a baseline value of zero to aim for on-site post development schemes that deliver biodiversity at the ratio of 0.2 units per hectare at a minimum. It will, however, be at the discretion of the LPA to decide on a site-by-site basis how many biodiversity units to deliver.

**2.5.4.2 For applications that provide no BNG calculations due to site baseline value of zero**

Although Defra is proposing to allow sites that have a baseline biodiversity value of zero or negligible to be exempt from BNG requirement, it is encouraged for these sites, regardless of its size to still incorporate biodiversity enhancement into its design. This could include features such as trees, rain gardens, shrub planting, green roofs and green walls, and through the creation of linear habitats such as rivers and hedgerows. It is recommended that a site with a baseline value of zero to aim for on-site post development schemes that deliver biodiversity at the ratio of 0.2 units per hectare at a minimum. It will, however, be at the discretion of the LPA to decide on a site-by-site basis how many biodiversity units to deliver. Table below sets out some examples taken from Doncaster Council BNG SPD, 2022:

Development site area in hectares	Minimum post development biodiversity unit goal for the site
0.25	0.05
0.5	0.1
1	0.2
2	0.4



### 3.7.3.3 Urban Greening Factor

Although Defra is proposing to allow sites that have a baseline biodiversity value of zero or negligible to be exempt from BNG requirement, it is encouraged for these sites, regardless of its size to still incorporate biodiversity enhancement into its design. For brownfield sites and sites with [low ecological value or a BNG metric calculation with a low baseline]. **Please refer to and use the full comment on [Urban Greening Factor 3.36](#).**

## **2.6 Biodiversity Net Gain offsite**

ECCs GI team support the proposal to deliver slightly above the 10% Biodiversity Net-Gain (BNG) in line with the Environment Act within the site boundary. However, it is noted that the [Insert document name i.e. Landscape and Visual assessment and DAS] mention that additional off-site delivery will be provided to enhance the adjacent [insert name of park, wildlife site off setting is taking place]. The BNG calculation within the [insert document i.e Preliminary Ecological Assessment Appendix, Biodiversity report] does not include any off- site mitigation. This should be considered to provide additional benefits. Moving forward, ECCs GI team recommends a Biodiversity Metric and Biodiversity Statement is updated once the landscape provision for both on-site and off-site is known and fixed.

## **2.7 Biodiversity Gain Plan (Condition) - <https://www.gov.uk/guidance/submit-a-biodiversity-gain-plan>**

Planning applications subject to mandatory BNG shall require a [Biodiversity Gain Plan](#) to be submitted to and approved in writing by the local planning authority before commencement. The Environment Act, under paragraph 14(2) of Schedule 7A of the Biodiversity Net Gain Planning Practice guidance sets out that the biodiversity gain plan should cover:

- How adverse impacts on habitats have been minimised.
- The pre-development biodiversity value of the onsite habitat.
- The post-development biodiversity value of the onsite habitat.
- The biodiversity value of any offsite habitat provided in relation to the development.
- Any statutory biodiversity credits purchased; plus.
- Any further requirements as set out in secondary legislation.

### **Reason:**

[Biodiversity Gain Plans](#) sets out the key ecological considerations relevant to the development proposals, the biodiversity management principles for new habitat creation areas and the enhancements that are likely to be achieved through such management. Like Landscape and Ecology Management Plan it aims to:

1. Verify the ecological baseline features of interest.
2. Identify ecological mitigation requirements; and,

3. Identify management and enhancement requirements relevant to the application area.
4. To enhance Protected and Priority Species/habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

## **2.8 Biodiversity Net Gain Management and Maintenance Plan**

Planning applications subject to mandatory BNG shall require a Biodiversity [Habitat Management and Monitoring Plan](#) to be submitted to and approved in writing by the local planning authority. To ensure that the net gain in biodiversity agreed upon in the Biodiversity Gain Plan/ Assessment shall be implemented in full within a 30-year period. The Biodiversity Net Gain Management and Maintenance Plan shall include 30-year objectives, management responsibilities, maintenance schedules and a methodology to ensure the submission of monitoring reports. The Biodiversity Net Gain Management and Maintenance Plan should cover:

- Details of the management and maintenance operations, actions and work schedule for years 1 – 5 and with broader management aims for the lifetime of the BNG commitment of 30 years.
- Proposals for monitoring needed to measure the effectiveness of management, including methods, frequency and timing.
- Details of the roles and responsibilities for implementation and monitoring, as well as the legal, financial, and other resource requirements for BNG delivery, are secured.
- Including setting out the reporting procedures and options for remedial works and adaptive management to account for necessary changes in work schedule to achieve the required targets if needed.

Reason:

In order to ensure measurable net gains are being delivered and effectively maintained and in accordance with LPA's BNG Policy, allowing the LPA to discharge its duties under the NPPF (2023).

## **2.9 Building with Nature**

It is recommended that any development proposal explores and applies the Building with Nature standards and achieves an accreditation to highlight what 'good' looks like at each stage of the green infrastructure lifecycle and strengthen the development and demonstrate the development goes beyond the statutory minima, to create places that really deliver for people and wildlife. The Building with Nature Standards has been developed by practitioners and policy makers, academic experts, and end-users, and has been tried and tested in multiple schemes from Cornwall to Scotland and is endorsed by Natural England, who is reviewing the current national green infrastructure

standards. For more information, please visit here: <https://www.buildingwithnature.org.uk/about>.

## **2.10 Construction Environmental Management Plan (condition)**

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a Construction Environmental Management Plan (CEMP). Ideally, strategic elements of the GI framework are brought forward in phase one of the development, to create a landscape structure or evidence is shown that substantive GI is secured as early as possible in initial phases of delivery to allow early establishment. Therefore, a Construction Environmental Management Plan (CEMP) will be required to set out how retained GI, such as trees, hedges and vegetation, as well as any nature designated sites (e.g. SSSI's etc.) will be protected during construction.

### ***Reason:***

The phased implementation of new GI of the development construction will allow for the GI to mature and it will provide further benefit of reducing/buffering the aesthetic impact from the construction work.

#### **2.10.1 Condition 2 for projects 250+**

No development shall take place until a Green Infrastructure Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted Plans shall include:

- Details of advance planting around construction sites; and
- The timescale for the implementation of each aspect of Green Infrastructure within that phase of development and details of the quality standard of construction and maintenance.

The development shall be carried out and thereafter maintained in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

## **2.11 Country Park**

It should be considered how the development site could have wider recreational impacts including on [Insert name of Country Park i.e. Great Notley Country Park]. In Paragraph 7.13 of the Planning Statement submitted, it is stated that:

“There are other recreation areas, such as the Great Notley Country Park, and footpaths which are more accessible from the application site which are more likely to be used by future residents.

It therefore should be demonstrated what impact this development may have on visitor numbers to the park. If there is a significant increase in visitor numbers, it should be demonstrated how any impacts of increased visitor numbers could be mitigated and ECC would wish to have further discussions around any such potential mitigation measures.

## 2.12 Culture, Heritage, and Community Spirit

ECCs GI team supports the centralisation of protecting culture, heritage and developing a community spirit through the delivery of the GI. Whilst GI provides environmental and economic benefits, it also delivers social benefits via, physical and mental health and wellbeing improvement, social inclusivity through the provision of space for social interaction and public gatherings and, the improvement of community identity through the development of a sense of place. To ensure the community is key in GI delivery, early and continued engagement with key stakeholders and community groups should be undertaken to ensure the GI approach outlined in the **INSERT SITE OR DOCUMENT** reflects the needs and wants of residents.

## 2.13 EIA Scoping Opinion

ECCs GI team recommend that the assessment study should include consideration of the provision of green infrastructure (GI). The EIA can help identify appropriate measures for avoiding or reducing significant adverse effects on the functionality of GI assets and can also assist in identifying measures for compensating/off-setting unavoidable significant adverse effects on GI assets to protect the overall integrity of the surrounding GI network.

## 2.14 Essex Climate Focus Area (NB text currently being reviewed)

The following advice on the Essex Climate Focus Area contains general comments for all planning applications (3.16.1) and then tailored for mineral sites (3.16.1.1) and Major and large sites (3.16.1.2).

### 2.14.1 General text for all planning applications

The aforementioned planning application is situated within the Essex Climate Action Commission's (ECAC) recommended [Climate Focus Area](#) (CFA), which is formed of the Blackwater and Colne River catchment areas (please see Figure 1 for further details). The objective of this recommendation is for the CFA to “accelerate [climate] action and provide exemplars, for learning and innovation: adopting Sustainable Land stewardship practices: 100% by 2030 and Natural Green Infrastructure: 30% by 2030” (ECAC, 2021). Among the objectives of the CFA are to achieve net zero carbon, biodiversity net gain, improve soil health and air quality, reduce flooding and urban heat island effect, and enhance amenity, liveability and wellbeing of Essex communities. It will achieve this by wholesale landscape change in rural areas and urban areas and it will look to developments and **especially mineral restoration sites** *[delete if not mineral site application]* to contribute to these targets.

Figure 1: Map of ECACs Climate Focus Area



**The follow is text specific for types of developments to add to the above text**

2.14.1.1 Recommendation/expectation text for Mineral sites

There will be an expectation for mineral sites restoration to contribute to sustainable land stewardship, climate change mitigation and adaptation, biodiversity and environmental net gain through the delivery of natural green infrastructure. Mineral sites can make a significant contribution to the recovery of nature and will be an important asset to Local Nature Recovery Strategy.

It is recommended that Nature After Minerals a partnership programme, supported by Natural England, the Minerals Products Association, and the British Aggregates Association is consulted. They can provide advice and work to champion opportunities for nature through high quality habitat creation on former quarries.

<https://afterminerals.com/>

If the restoration proposal is to return the site to arable land it will need to a better grade than before and demonstrate how it will deliver sustainable land stewardship with potential to link to Landscape recovery – a successor to the Countryside Stewardship scheme.

2.14.1.2 Recommendation/expectation text for Large Scale Strategic sites/ for other Major Planning applications (I.e. East and West Chelmsford)

CFA require developments to take into account the following requirements in line with meeting the requirements outlined in NPPF:

- a) biodiversity net gain to enhance biodiversity and the natural environment by creating Natural Green Infrastructure contributing to the CFA 30% by 2030 target and the wider Local Nature Recovery Network/Strategy.
- b) flood and water management, for those properties at risk of flooding to include Integrated Water Management and Natural Flood Management techniques.

- c) New developments to improve urban greening of our towns, and villages through the provision of street trees for example. New developments are necessary in terms of increasing greenspace creation, naturalizing existing green spaces, greening the public realm, and implementing sustainable drainage systems (SuDS).

## 2.15 Essex Forest Initiative

Moving forward, ECCs GI team recommends that Tom Moat, Senior Forestry and Woodland Officer is consulted in relation to trees and woodland. There are opportunities to work with the Essex Forest Initiative to assist in tree planting for new development, including funding and advice. For more information, please contact [Tom.Moat@essex.gov.uk](mailto:Tom.Moat@essex.gov.uk) who would be very interested in discussing further.

## 2.16 Essex Water Strategy

ECC are in the process of developing the Essex Water Strategy. Moving forward, this emerging study, the supporting works and findings of this strategy have the potential to influence and support the direction taken in regard to water conservation.

## 2.17 Existing Landscape Assets

ECCs GI team supports the retention of GI features. Moving forward, we recommend that the Preliminary Ecological Assessment and Phase II surveys are utilised to outline the existing site GI in inform design moving forward. The identified existing GI needs to be incorporated as a part of the design where possible with strongly worded commitments made for the retention of features. Where the removal of high value GI is unavoidable, a suitable location will need to be identified for the GI to be replacement to an equal or enhanced standard.

## 2.18 Grassland Alternatives [from Monoculture/Single seed Grass and Artificial Grass]

ECCs GI team support an approach to landscaping that seeks to maximise opportunity for biodiversity enhancement, carbon sequestration, drought resistance, and ease of maintenance and management. To ensure the integration of nature and other multifunctional benefits, ECCs GI team recommends alternatives to low quality, monoculture grasses and artificial grass are explored. ECCs GI team recommends consideration of the following, depending on variables like sunlight and soil type.: -

- *Grassland: Consideration of species rich grassland within developments can encourage biodiversity by providing habitat, it is low maintenance as it requires less mowing, and also provides a carbon sink. For more information see [Grassland | The Wildlife Trusts](#).*
- *Wildflower Meadow's: Meadows can look spectacular and attract a variety of pollinators to enhance biodiversity of an area. A mixture of wildflower species is recommended and there are many Native British species to consider. For example, the Primrose (*Primula vulgaris*). Meadows can also be both small and large scale. For more information see: <https://www.rhs.org.uk/lawns/wildflower-meadow-establishment>*

- *Orchards, Food Forests and Allotments: Including an orchard, Food Forest and/or an allotment within a development site can have wide-reaching benefits for the community, for social and mental well-being, provide education, and produce seasonal and local produce. There are also benefits for biodiversity and the climate.*
- *Lawns: Encouraging residents to keep their lawns longer, especially in the spring can increase the biodiversity within the development. Schemes such as ‘no-mow-May’ provide an example into the impact ‘wild’ lawns can have on the biodiversity in a local area.*
- *Pervious/Permeable driveways and surfaces: It allows rainwater to infiltrate through into underlying layer where it is temporarily stored and fills gaps of exposed turf between plants.*
- *Wetland and water features: Areas of marsh, fen, peatland, or water—whether they are created naturally or artificially, permanent or temporary, with still or flowing water that is fresh, brackish, or salt—are referred to as wetlands. Constructed wetlands are specially created landscape elements that are installed in order to treat contaminated water, lower the risk of flooding, increase biodiversity, and provide amenity spaces. They do this by utilising naturally occurring physical, ecological, and chemical processes.*
- *Xeriscaping: Landscaping with minimal use of water and climate resilient planting.*

## 2.19 Green and Blue Infrastructure

ECCs GI team notes that development both within and surrounding **the site** is anticipated to result in an increased use of existing **green space/park [or insert name of green space/park i.e. Epping Forest]**. The protection of existing alongside the provision of SANGs, new multifunctional green and blue infrastructure on site (with effective PRow access between the town centre and these spaces) or developer contributions to deliver new off-site and enhance existing GI could mitigate the impact of increased demand.

## 2.20 Green Infrastructure

As outlined in the Essex GI Strategy (2020), the following can be considered as Green Infrastructure: -

- Parks and Gardens
- Natural and semi-natural green spaces
- Designated sites (SPAs, SACs, Ramsars, SSSIs, National Landscapes (AONBs))
- Reservoirs, lakes, and ponds
- Waterways (watercourses)
- Greenways (Public Rights of Way, footpaths, cycleways and tracks, bridleways, towpath)
- Outdoor Sports Facilities (Sports pitches)
- Amenity green space (provision for play facilities etc.)
- Green spaces around premises (Educational premises open space and playgrounds)

- Cemeteries and churchyards
- Allotments, community gardens and city farms
- Public Realm/Civic spaces (urban greening – urban and street trees, road verges, green walls, green roofs, Sustainable Drainage Systems and Natural Flood Management)
- Productive Spaces (agricultural land and meadows)
- Green Corridors (verges, green wedges, and green fingers)

## 2.21 Green Infrastructure Audit

ECCs GI team recommends that a GI audit (or equivalent) is undertaken to outline and assess the existing GI and outline its value in terms of the functions and benefits this infrastructure/these spaces provide. To comprehensively outline this, early and continued community engagement and consultation is required.

## 2.22 Green Infrastructure Strategy

Moving forward, ECCs GI team recommends the production of a Green Infrastructure Strategy for the site, based on the Essex Green Infrastructure Strategy and GI Standards to provide a more detailed an assessment of the ecological context of the development. The scheme should include but not be limited to:

- The development should be designed to deliver Biodiversity Net Gain and wider environmental net gains, that forms an important component of nature recovery networks and the wider landscape scale GI network.
- Demonstrate that the development site/setting has been reviewed for multiple functions and benefits (listed in the Essex GI Strategy (chapter 5.1, page 35) and ensure that green/open spaces are designed to ensure multi- purpose and functional use.
- Travel Infrastructure should give consideration to use of GI features to ensure accessibility across the site.
- Ensure there are good accessible links for all from the development to existing settlements, urban centres, rural areas, active travel networks and green spaces.
- Demonstrate how the GI has been designed to provide recreational facilities for different user and age groups. It should deliver social inclusive processes that are open to all and incorporate the knowledge and needs of diverse parties.
- Tree Planting should be undertaken on site wherever possible. There are opportunities to work with the Essex Forest Initiative to assist. ([environment@essex.gov.uk](mailto:environment@essex.gov.uk)).

***[Note this can be used as a condition for sites over 250 dwellings and strategic commercial sites we would expect the green infrastructure principles to be addressed for a green infrastructure strategy to be submitted at later planning stage].***

For example:

No works shall takes place until a detailed [**Green Infrastructure Strategy/ Landscape**] Strategy for the site, based on the Essex Green Infrastructure Strategy and Essex GI Standards and an assessment of the ecological context of the development, has been



submitted to and approved in writing by a landscape specialist from the local planning authority. The scheme should include but not be limited to:....

**Reason:**

GI and its connectivity are to be at the heart of decision making at every stage in the planning and design process for all developments from the outset, thus GI is integral to place shaping. Planning and design of GI will ensure individual building, street, neighbourhood and landscape scale intervention features contribute to a coherent, meaningful and practical network of high-quality and multi-functional GI, that will provide multiple environment, social and economic benefits within the development and wider area. By ensuring good early design in light of the local context and including local policy context, the GI will more effectively meet local priorities and needs.

The National Planning Policy Framework 2023 paragraph 8c sets environmental protection and enhancement as one of the 3 objectives of the planning system. Paragraph 102 states that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.

## 2.23 Green Roofs

ECCs GI team expects a detailed scheme for green roofs (including maintenance and management arrangement) to have been submitted and approved in writing by the Local Planning Authority Prior to first occupation.

### 3.24.1 Bio Solar

It is positive to see the inclusion of solar panels on the roof of the **[Insert name of building/site]**. The ECC GI team recommends that the use of Bio Solar is explored. This can have dual benefits for energy and biodiversity. This includes biodiversity habitat creation, water storage capacity, flood alleviation and energy saving potential. Further information can be found here: <https://livingroofs.org/introduction-types-green-roof/biosolar-green-roofs-solar-green-roofs/> .

***[For further information on integrating nature into developments please refer to [Sustainable Design 3.34.](#)]***

## 2.24 Health/ Hospitals/ Care Homes GI Provision

We recommend the use of strategic GI onsite at this **health/hospital/care home** proposed development. GI, when delivered correctly, will be multifunctional and positively impact on health and wellbeing for all. Access to good quality GI can encourage more active lifestyles, and there is a clear association between psychological health, mental wellbeing, and physical activity. A Health Impact Assessment will help to assess if the GI provision meets the diversity of user groups, whose needs may vary according to age, abilities, interest, or cultural beliefs. Green space and GI onsite could also form part of green care programmes benefitting **residents/patients**. The Essex Green Infrastructure Standards (2022) should be

consulted and includes technical guidance on delivery of GI as well as best practice case studies.

## **2.25 Landscape Ecological Management Plan (Condition)**

No development shall take place until there has been submitted to and approved, in writing, by SuDS and landscape specialists at the Local Planning Authority a landscape ecological management and maintenance plan and work schedule for a minimum of 10 years. **Although through mandatory biodiversity net gain it will be expected for the habitat to be secured for at least 30 years via obligations/ conservation covenant [add if comments include BNG requirements].**

Details should include who is responsible for GI assets (including any surface water drainage system) and the maintenance activities/frequencies.

We would also expect details on how management company services for the maintenance of GI assets and green spaces shall be funded and managed for the lifetime of the development to be included.

### **Reason:**

To ensure appropriate management and maintenance arrangements and funding mechanisms are put in place to maintain high-quality value and benefits of the GI assets.

Failure to provide the above required information before commencement of works may result in reducing the value of the development, becoming an undesirable place to live that may increase the impacts from climate change, such as flood risk or air pollution from the site.

### 2.25.1 yearly logs of maintenance (Condition)

The applicant or any successor in title must maintain yearly logs of maintenance which should be carried out in accordance with any approved Maintenance Plan. These must be available for inspection upon a request by the Local Planning Authority.

### **Reason:**

To ensure the GI are maintained for the lifetime of the development as outlined in any approved Maintenance Plan so that they continue to function as intended to ensure the high-quality and multi-functional benefits of GI assets.

## **2.26 Lawton Principle**

ECCs GI team promotes the delivery GI through the 'Lawton Principle' which advocates for a landscape-scale approach to conservation and the enhancement of connection between green sites- either through physical corridors or through 'stepping-stones'. A bigger, better, and connected approach to GI delivery ensures that green space is accessible to all, enhances biodiversity (both through the delivery of new habitats and wildlife corridors) and improves the character and sense of place.

## **2.27 National Landscapes (AONB) Designated Sites**

Essex County Council is a partner in the Dedham Vale National Landscape and Stour Valley Partnership and supports the Dedham Vale National Landscape and Stour

Valley Management Plan 2021 to 2026. This is a statutory document which should be afforded significant weight in decision making including when the applicant is developing proposals for their application. It states that ‘planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest’. Development is acceptable where it contributes to the statutory purposes of the National Landscape (Formerly AONB). Section 3.2 (Page 32) of this Management Plan includes an objective that states “Infrastructure does not significantly negatively impact the AONB or Stour Valley project area”.

The following examples of advice relates to NSIP developments:

(Note that these comments were made before the AONB was renamed National Landscapes).

*[Example recommendation from consultation for the Anglian Water Pipeline Bury to Colchester (Feb 2023) that proposed underground pipework on a small part of National Landscape (AONB) land]*

Essex County Council supports the decision for underground piping **across/that crosses between [insert location] and [insert location] of the designated AONB and within the Stour Valley Project area**, due to the intrinsic landscape and scenic quality of the area along with its relative wildness and tranquillity. When this is being undertaken, appropriate measures should be taken however to avoid, minimise, mitigate and compensate negative impacts including to cultural heritage and archaeology. It is recommended that the ANOB Partnership is consulted for their advice on this matter and to review any mitigating measures.

*[Example recommendation from consultation for the Bramford – Twinstead National Grid consultation in May 2021]*

The Electricity Act 1989 requires National Grid to have regard to the desirability of preserving natural beauty’ and this is not limited to designated sites. Essex County Council supports the undergrounding of cables across the designated AONB and within the Stour Valley Project area, due to the intrinsic landscape and scenic quality of the area along with its relative wildness and tranquillity. When this is being undertaken, appropriate measures should be taken however to avoid, minimise, mitigate and compensate negative impacts including to cultural heritage and archaeology.

It is evident from the documentation provided as part of this consultation, that there can be significant impacts associated with the installation of infrastructure which is necessary to deliver the undergrounding including transitions / cable sealing end compounds and sub stations. The intention to minimise such impacts on the defined qualities of the AONB and Stour Valley Project Area is welcomed.

## **2.28 Play and Natural Play**

ECCs GI team supports the consideration of natural play. For this, we would expect play strategies to be formed by the character and function of the green spaces. It should be

imaginatively designed using landforms, level changes and water, as well as natural materials such as logs or boulders, which create an attractive setting for play.

### **2.29 Public Right of Way and Nature Routes**

Exploring connectivity here is critical as **this strategy [insert document title]** needs not only to enhance nature through biodiversity net-gain and habitats but also needs to find the balance with access networks for active travel and recreational routes, through connecting existing and the creation of new routes. Therefore, ECCs GI team recommends that the routes outlined include wildlife corridors and stepping-stones and, sustainable transport routes such as paths, cycle, and bridleways.

- For further details regarding the existing Public Right of Way network, please see <> and/or contact <[Helen.Baker@essexhighways.org](mailto:Helen.Baker@essexhighways.org)>

### **2.30 RAMS**

ECCs GI team support the successful delivery of the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy and the delivery of supporting well-designed open space and green infrastructure.

### **2.31 Restoration and Decommissioning plan (Condition)**

A site wide restoration and decommissioning plan should be submitted to demonstrate how the site will be restored to a natural habitat post the operational life of the application site. The decommissioning plan should include details of the removal of all equipment, facilities and structures including any subsurface cabling and footings. Any access roads created for building or maintaining the system shall also be removed and re-planted with an appropriate landscape scheme. The solar panels and all other equipment and boundary fences to be removed from the project site.

#### **Reason:**

To ensure that the site and its established GI is protected and restored in an appropriate manner consistent with the aims and aspirations of the original Landscape and Ecology Management Plan and GI strategic outcomes.

### **2.32 School Grounds**

ECC welcome the provision of a playing field as part of the primary school site. For this, we would expect the school playing field are designed to ensure multi- purpose and functional use and not just concrete grounds or sport field. To provide green spaces for natural play, sensory, areas that enhanced biodiversity and contribute to climate change mitigation and adaptation (flood and water mitigation, shading, air quality etc.) that all together can contribute to the curriculum, for example PE, science, English, maths, outdoor learning and forest schools. It will improve staff and pupil health, wellbeing, learning and chances in life. In 2021, Department for Education announced a new initiative designed to put climate change at the heart of education, young people will be empowered to take action on the environment. By 2023, teachers will have access to a model science curriculum designed to teach children about nature and their impact on the world. In addition, children will be encouraged to get involved in the natural world by schools enhancing their school grounds for biodiversity.

### 2.33 Solar Farms & Green Infrastructure

In regard to the delivery of solar farms, ECCs GI team recommends that opportunities to promote biodiversity are explored. Biodiversity can be enhanced on solar farms in a number of ways, including through the establishment of hedgerows, wildflower meadows, bird boxes, insect houses and ponds. For further guidance and information, ECCs GI team recommends: -

- *BREs National Solar Centre Biodiversity Guidance for Solar Developments*, available at: <<https://www.bre.co.uk/filelibrary/pdf/Brochures/NSC-Biodiversity-Guidance.pdf>>. This documentation outlines guidance to planners on how biodiversity can be supported on solar farms.
- *The Longfield Solar Farm EDF study for biodiversity net-gain opportunities*. For more information, please contact: James Pateman, Project Manager <[info@longfieldsolarfarm.co.uk](mailto:info@longfieldsolarfarm.co.uk)>.

### 2.34 Special Roadside Verges

Where possible, these verges must be protected from development and the adverse impacts of surrounding growth and opportunities for the expansion and enhancement of the special verges network should be explored.

### 2.35 Street Trees

Streets trees should be used alongside other additional tree planting. The Essex Forest Initiative provides opportunities for developers to work with ECC on tree planting. NPPF Paragraph 136 states “Planning policies and decisions should ensure that new streets are tree-lined, .....that appropriate measures are in place to secure the long-term maintenance of newly-planted trees...”

### 2.36 Sustainable Design

ECCs GI team support a strategy that seeks to maximise opportunity for habitat retention. To ensure the integration of nature into development, ECCs GI team recommends sustainable design is explored. ECCs GI team recommends consideration of the following: -

- *Green Roofs/Walls*: The provision of these features allow ecosystems to function and deliver their services by connecting urban, peri-urban and rural areas. Alongside biodiversity habitat creation, green roofs and walls can provide water storage capacity, flood alleviation and energy saving potential. In addition to buildings, these features can be provided on sustainable transport infrastructure (such as on bus stop/ cycle storage facilities).
- *Wildlife Bricks*: The provision of wildlife bricks creates habitats for invertebrates.
- *Dual street furniture/seating (i.e., a bench including a planter)*: The design of the street furniture and bin stores can contribute to the landscape character, reduce clutter of an area or street and act as a green corridor/link to the wider landscape scale GI network.

### 2.37 Sustainable Drainage Systems & Green Infrastructure

ECCs GI Team supports the delivery of ‘a variety of green and blue infrastructure that provides an environmental support system for the community and wildlife’. ECC recommends consideration is given to the utilisation of GI and Sustainable Drainage Systems (SuDs). GI and SuDs should be developed together to maximise benefits through multifunctionality- they do this by helping to reduce flood risk whilst providing biodiversity and amenity benefits.

### 2.38 Urban Greening Factor

Although Defra is proposing to allow sites that have a baseline biodiversity value of zero or negligible to be exempt from BNG requirement, it is encouraged for these sites, regardless of its size to still incorporate biodiversity enhancement into its design. For brownfield sites and sites with low ecological value [**or a BNG metric calculation with a low baseline**]. The ECC GI team recommends that the Urban Greening Factor is consulted to establish best practice. The Urban Greening Factor (UGF) is a planning tool to improve the provision of Green Infrastructure (GI) particularly in urban areas. It can be used to increase urban greening and contribute to Biodiversity Net Gain. While it is voluntary, the ECC GI team strongly recommends utilisation of the UGF, and it can significantly contribute to place making, nature recovery, biodiversity enhancement, and connectivity to larger green infrastructure networks within proximity to the development site. More information can be found within the [National Green Infrastructure Framework Standards](#) (2023).

## 3. GI Advisory Planning Note/Letter Informative

### 3.1 Advisory Point (note can be added at end of letter of response)

- Tree Planting. There are also opportunities to work with the Essex Forest Initiative to assist. ([environment@essex.gov.uk](mailto:environment@essex.gov.uk))
- Link to Essex GI Standards – [Essex Green Infrastructure Standards | Essex Design Guide](#)
- Link to the Biodiversity Net Gain Guidance Pack – Essex Local Nature Partnership: [Guidance on Biodiversity Net Gain \(canva.com\)](#)

### 3.2 Climate Change (to be added to all informative at end of letter of response)

Mitigating and adapting to a changing climate is a national, Local and Essex County Council priority. The Climate Change Act 2008 (amended in 2019) commits the UK to achieving net-zero by 2050. In Essex, the [Essex Climate Action Commission](#) proposed 160+ recommendations for climate action. Essex County Council is working with partners to achieve specific goals by 2030, including net zero carbon development. All those active in the development sector should have regard to these goals and applicants are invited to sign up to the [Essex Developers’ Group Climate Charter \[2022\]](#) and to view the advice contained in the [Essex Design Guide](#). Climate Action [Advice guides](#) for residents, businesses and schools are also available.

### 3.3 Standard GI Informative (to be added at the end of letter of response)

#### INFORMATIVES:

- Any GI features proposed for adoption by [LPA/Essex County Council] should be consulted on with the relevant Highways Development Management Office.
- It is not within the scope of the GI team to comment on the overall viability of a scheme as the decision is based on a range of issues which are outside of this authority's area of expertise.
- We will advise on the acceptability of green infrastructure and the information submitted on planning applications based on the key documents listed within this letter. However, any relevant information relating to green infrastructure submitted as part of any previous applications should be submitted with the updated information.
- The GI consultation responses provide a high-level review of the proposals onsite. However, the relevant specialists e.g. ecology and landscape specialists should still be consulted on the information submitted. It should be noted that detailed discharge of condition applications should be referred to technical specialists rather than the GI planning team.

## 4. GI Comments Compilation for Policy (Local Plans)

### 4.1 Accessibility to Green Infrastructure

**INSERT POLICY/STRATEGY** should identify where developer contributions/ regional and local growth can be used to help enhance and increase the accessibility of existing GI and outline opportunities to increase the provision of accessible, multifunctional GI through new initiatives. Moving forward, ECCs GI recommends the use of the National Green Infrastructure Framework S2-[Accessible Greenspace Standard](#) (previously known as Accessible Natural Green Space Standard (ANGSts)). Where it is recommended that everyone has access to good quality green and blue spaces close to home (within fifteen minutes walk) for health and wellbeing and contact with nature.

### 4.2 Active Travel Routes and GI

The Local Plan to supports and encourages opportunities to enhance and establish green infrastructure along sustainable transport and PRow networks to both encourage active travel and create a green corridor for wildlife. This could include, but not be limited to, the integration of nature focused SuDS; native hedgerows, tree and shrub planting; incidental 'play on the way' features / trails; informal sport (outdoor gym/fitness trails); and areas for seating to stop and rest.

### 4.3 Biodiversity Net Gain % debate (advice for SPDS)

The Essex LNP Biodiversity and Planning Working Group are currently reviewing and exploring the feasibility for 20% Biodiversity Net Gain. [Insert LPA name] may wish to consider adopting a higher figure than the minimum 10% requirement within the Environment Act (2021).

#### 4.4 Connectivity

The interconnectivity of natural environment, flood protection and water management, outdoor sport and open space, and public realm is an important part of the GBI network and shouldn't be seen or treated in silo. The right design and location, wide range of functions and benefits of GBI can fulfil people and wildlife, the interactions should be emphasised.

i.e.

- Every effort needs to be made to ensure that connections between green spaces, local amenities and developments are achieved to ensure that routes make sustainable connections and are attractive through the delivery of GI for the benefit of the new community and existing communities.
- ECC recommends including 'improvements or greening the public realm (i.e., street trees, dual purpose street furniture with planters, rain gardens etc)'.

#### 4.5 Developer Contribution

ECC GI Team would recommend that the emphasis to secure GI through the delivery of the new development whether through BNG and S106 over the potential to secure through developer contribution to ensure GI is delivered as part of development construction and not relying on third party to deliver the GI.

New GI must be provided either through on-site provision or financial contributions. The size of contribution will be linked to the scale of the development and the resulting new GI must be multi-functional and located as close as possible to the development it is intended to serve. Where it is not practical for GI, or all elements of the GI such as open space, to be provided on site or existing facilities nearby could most effectively be enhanced, a commuted payment may be accepted to purchase, layout and maintain open space or to improve existing provision in lieu of the provision of the full standard on site.

Pooling of contributions from a number of developments is likely to be required to develop strategic GI facilities such as a Country Park. This may be limited by the pooling rule, which means that partial funding for such projects is more likely to come from the Community Infrastructure Levy.

#### 4.6 Early Engagement

The Essex Green Infrastructure Strategy (2020) and Essex GI Standards (2022) calls for early collaboration and engagement with all relevant stakeholders, partners, and communities to support the delivery of effective and connected GI. Further engagement on the placement, supporting policy and delivery of new GI, and the protection of existing, is expected moving forward.

#### 4.7 Essex Climate Action Commission

ECCs GI team expects **INSERT LA / or Strategy title** to make a strong commitment towards the delivery of multifunctional green infrastructure and biodiversity net-gain. The Essex Climate Action Commission's (ECAC) July 2020 report, Net-Zero: Making



Essex Carbon Neutral; outlines the importance of the GI for biodiversity, flood and drought control, soil health, air quality, reduced urban heat island effect and human health and wellbeing. The commission outlines the following recommendations for Essex: -

- 30% of all land in Essex will enhance biodiversity and the natural environment by creating natural green infrastructure. We expect these figures to be 25% by 2030 and 30% by 2040.
- To increase urban greening – 30% greening of our towns, villages, and new developments by 2040.
- Create a Climate Focus Area (CFA) to accelerate action and provide exemplars, for learning and innovation: adopting Sustainable Land stewardship practices: 100% by 2030 and Natural Green Infrastructure: 30% by 2030.

#### **4.8 Essex Climate Focus Area (NB text currently being reviewed)**

Recommendations for text to support CFA in Local Plans and Neighbourhood Plans if appropriate

The Local Plan/ Neighbourhood plan is within the Essex Climate Action Commission’s (ECAC) recommended [Climate Focus Area](#) (CFA), which is formed of the Blackwater and Colne River catchment areas (please see Figure 1 for further details). The objective of this recommendation is for the CFA to “accelerate [climate] action and provide exemplars, for learning and innovation: adopting Sustainable Land stewardship practices: 100% by 2030 and Natural Green Infrastructure: 30% by 2030” (ECAC, 2021). Among the objectives of the CFA are to achieve net zero carbon, biodiversity net gain, improve soil health and air quality, reduce flooding and urban heat island effect, and enhance amenity, liveability and wellbeing of Essex communities. It will achieve this by wholesale landscape change in rural areas and urban areas. The CFA will look to developments to contribute to these targets.

**Figure 1: Map of ECACs Climate Focus Area – Use map above under [3.14.1](#)**

CFA require Local plans and Neighbourhood plans to encourage developments and landowners to take into account the following requirements in in line with meeting the requirements outlined in NPPF and Environment Act, 2021:

- a) biodiversity net gain to enhance biodiversity and the natural environment by creating Natural Green Infrastructure contributing to the CFA 30% by 2030 target and the wider Local Nature Recovery Network/Strategy.
- b) flood and water management, for those properties at risk of flooding to include Integrated Water Management and Natural Flood Management techniques.
- c) In order to achieve urban greening of our towns and villages, new developments are necessary in terms of increasing greenspace creation, naturalizing existing green spaces, greening the public realm, and implementing sustainable drainage systems (SuDS).

It is important to adopt sustainable land stewardship practices on arable land so that farmers will be able to produce public goods such as environmental protection, biodiversity, animal welfare, and climate change mitigation, in addition to food production.

## 4.9 Essex GI Strategy and Standards

Headline Comment: Consideration should be given to the use of the Essex Green Infrastructure Strategy (2020) and Essex Green Infrastructure Standards (2022) in securing multifunctional green infrastructure. ECC has also established a Local Nature Partnership (LNP) covering Greater Essex along with developing a Local Nature Recovery Strategy.

Summary Comment: ECCs GI team expects the [Insert document name i.e. **Neighbourhood Plan**] to consider, apply and reference the Essex GI Strategy (2020) and the Essex GI Standards (2022). These documents champion for the enhancement, protection, and creation of an inclusive and integrated network of green spaces. Applying Essex’s nine GI principles will help to ensure quality and consistency in the provision, management, and stewardship of GI an essential part of place-making and place-keeping for the benefit of people and wildlife.

## 4.10 Essex GI Standards (2022)

ECC recommends reference is made to the Essex Green Infrastructure Standards (2022), which should be used as part of the Plan’s evidence base and have been endorsed by Natural England and awarded Building with Nature Policy accreditation, 2023.

The Essex GI Standards outlines nine principles and standards for the protection, enhancement, creation, and management of GI in Essex. The application of these principles and standards through development management and planning policy will ensure the delivery of multifunctional, accessible high-quality GI.

### Essex GI Principles and Standards:

1. *Mainstreaming and Integration*
2. *Evidence-Led*
3. *Multifunctionality*
4. *Early Engagement*
5. *Managing Different Expectations*
6. *Health, Wellbeing and Social Equity*
7. *Connectivity*
8. *Strong Policy Wording and Commitment and,*
9. *Stewardship*

This guidance contents focuses on the technical application of the principles and standards and includes material regarding, why the principles and standards matter, how to achieve the principles and standards and, guidance to deliver these principles and standards (including indicators and measures of success). In addition, best practice case-studies and illustrative examples are also outlined.

A non-technical summary of the Essex GI Standards has also been produced for those without specialist knowledge of the subject area. <[Essex Green Infrastructure Standards | Essex Design Guide](#)>

#### 4.11 Essex GI Strategy (2020)

Published in 2020, The Essex Green Infrastructure (GI) Strategy provides a vision and objectives for the future of GI delivery in Essex; to ensure a positive approach is taken in enhancing, protecting, and creating an inclusive and integrated high-quality GI network.

**Essex GI Vision:** *“We will protect, develop and enhance a high quality connected green infrastructure network that extends from our city and town centres, and urban areas to the countryside and coast and which is self-sustaining and is designed for people and wildlife”.*

##### Essex GI Objectives:

- *Protect:* protect existing GI, especially designated sites
- *Improve:* improve existing GI to ensure better functionality for people & wildlife
- *Create:* create more high-quality multifunctional GI
- *Connectivity:* improve the connectivity of GI for people and wildlife
- *Inclusivity:* increase the inclusivity of GI for all user groups
- *Health:* provide GI facilities to promote health and wellbeing
- *Sustainability:* work with partners to secure funding, effective governance, and stewardship.

In addition, this strategy outlines- a GI evidence-basis, a summary of the green assets in Greater Essex and, the delivery mechanisms needed to implement, action, and monitor the strategies objectives.

- For further details, please visit <[Essex Green Infrastructure Strategy \(2020\)](#)>

This strategy was awarded a *Building with Nature Accreditation of ‘Excellent’*. This was one of only eight local authorities to gain this authentication.

#### 4.12 Essex is Green StoryMap

Developed to inform the Essex GI Strategy (2020), the Green Essex StoryMap provides a spatial analysis through the GIS mapping of the distribution of green infrastructure across Essex.

- For further details, please visit <[Green Essex \(arcgis.com\)](#)>

#### 4.13 Essex Local Nature Partnership

Summary Comment: Essex has now established a Local Nature Partnership (LNP). The LNP contains four working groups – a community engagement group, Agriculture working group, a planning a biodiversity net gain working group and, a Local Nature Recovery Strategy (LNRS) group. Moving forward, the studies, works and findings of these groups have the potential to influence and support the direction of nature recovery through the **Neighbourhood/ Local Plan**.

Objectives Summary: In March 2022, the Essex Local Nature Partnership (LNP) was Established. The Essex LNP is an independent body to that of ECC that meet quarterly (for further details, please visit: << [Essex Local Nature Partnership >](#)). The Essex LNP has committed to the delivery of four key targets: -

1. 25 per cent of all land in Essex will enhance biodiversity and the natural environment by creating natural green infrastructure. (This is an Essex Climate Action Commission Target that has been adopted by the LNP)
2. 50 per cent of all farmland in Essex will adopt sustainable land stewardship practices by 2030 (This is an Essex Climate Action Commission Target that has been adopted by the LNP)
3. For the LNP adopt the Wildlife Trust's 1-in-4 programme to engage residents with Nature and achieve a 25% engagement level.
4. Accessible Natural Green Space Standards (ANGSt) target for everyone to have access to high quality natural space close to home and work.

ECCs GI team are committed to ensuring these targets are embedded into local plans.

#### **4.14 Greater Essex Local Nature Recovery Strategy (GELNRS)**

ECC is the 'Responsible Authority' for delivering the [GELNRS](#) working closely with the Essex Local Nature Partnership (LNP) to provide direction and ensure key stakeholders are engaged. The GELNRS is being prepared for completion by Mid-2024. The GELNRS will form the baseline for habitat information, which in turn will generate action to promote biodiversity management and improvement (including identifying strategic opportunity areas) and will provide further useful information.

#### **4.15 Landscaping and Open Spaces (Multipurpose Spaces)**

ECC recommends that [paragraph(s) x – x] should refer to the recommendation for multipurpose open spaces. Multifunctional spaces bring a wider spectrum of environmental, social and economic benefits to urban areas, especially for small areas of open spaces and more cost-effective way of addressing many social, wellbeing, drainage and other hard infrastructure needs.

#### **4.16 Local Wildlife Sites**

Local Wildlife Sites are wildlife-rich sites which are selected for their local nature conservation value and can contain important, distinctive, and threatened habitats and species. Where possible, these sites must be protected from development and the adverse impacts of surrounding growth and opportunities for the expansion and enhancement of these sites should be explored.

#### **4.17 Mainstreaming and Integration of GI**

GI should be considered and prioritised throughout the planning process to ensure it is effectively designed and integral to the whole development from the outset. The Essex Green Infrastructure Strategy (2020) and Essex GI Standards Guidance (2022) outlines nine principles of good GI and identifies target measures and indicators to achieve quality and consistency in the provision, management, and stewardship of GI as an essential part of place-making and place-keeping for the benefit of people and wildlife. This includes supporting standards such as: Building with Nature, Livewell Development Accreditation and, National GI Framework. In addition, the 25 Year Environment Plan (2018) and Environment Act (2021) place significant importance on protecting and enhancing GI, accessibility, and biodiversity net gain. In it expected that these policies, standards, and principles are included in design guides/codes and

masterplans to ensure that substantive GI and biodiversity net-gain is secured and effectively delivered.

The Natural Environment Planning Practice Guidance (PPG), 2019 supplements the information provided in the NPPF and describe the GI benefits and how it can be considered in the preparation of planning policy. the PPG emphasises that GI opportunities and requirements need to be considered at the earliest stages, and as an integral part, of development proposals. Delivery and funding of GI can use planning conditions, obligations, or the Community Infrastructure Levy.

## **4.18 Multifunctional Green Infrastructure**

### 4.18.1 If multifunctional GI is not referenced

ECCs GI Team recommend reference is made to multifunctional green infrastructure [**and not just for reducing pressure on footfall on existing green spaces**]. ECCs GI Team considers that all major and strategic development sites should be designed around green and blue infrastructure to inform and shape the development. Particularly within denser developments, green infrastructure and open space should be approached from a multifunctional perspective, combining uses such as sustainable drainage, public open space, green corridors/ walking and cycling routes shading through street trees and biodiversity conservation to combine functional uses with amenity benefits. These features should be strategically located to provide green infrastructure and landscaping in prominent spaces to maximise the benefits and connectivity to site users and increase the usability of multifunctional space.

### 4.18.2 Hierarchy approach to site location of development

ECCs GI team recognises and respects that, in order to meet [**LPA's**] housing need (as outlined under [**insert document name and paragraph**]) some green spaces, agricultural land and/or Green Belt land may have to be released for development. However, we expect development to have a high delivery of multi-functional green infrastructure and deliver biodiversity net-gain. It is advised that a hierarchy approach and clear justification have been used to show that no alternative site is suitable, and that the development provides access to multifunctional and high-quality greenspace and GI features (ideally to better quality) and/or compensates for or invests in a neighbouring green space for the benefit of the future and existing communities.

### 4.18.3 New strategic green spaces

ECCs GI team supports the delivery of new strategic green spaces or a new Country Park however, this should not be at the expense of GI delivery and biodiversity net gain on-site. Multi-functional, accessible GI should be delivered on all major development sites.

### 4.18.4 Benefits of Multifunctional GI

Through the right design, right green infrastructure, and right location of green infrastructure it can deliver more than one function and contribute to more than one priority, providing cost efficiency in the long term to deliver better outcomes.

## 4.19 Natural Flood Management

ECCs GI Team would anticipate that the natural environment should be maintained and where possible improved as part of any new development. ECCs GI Team anticipate that flood risk management would have a key role in providing green and blue infrastructure corridors throughout [LPA area], in particular, linking areas of habitat across the boundaries of adjacent administrative areas. ECC GI Team therefore seeks policies to align with Essex Lead Local Flood Authority, the Essex SuDs Guide and for the wording to acknowledge the importance of SuDS provision in developing the natural environment within the [LPA] Local Plan.

### 4.19.1 Sustainable Drainage Systems

Green infrastructure can be utilised to help manage surface water run off. There is a need to include more detail on the benefits of naturalised (GI) SUDs, and for SUDs to be integrated as aesthetic and accessible features within the GI of all developments. Naturalised SUDs provide a high-quality environment for people, by providing amenity value, opportunities for environmental education, delivering safe surface water management systems and improving ecological connectivity.

## 4.20 Natural Play and Outdoor Learning

ECC recommends that the description of ‘Children’s playing space’ should include the provision of and opportunity for natural play. Children’s engagement with a natural play space, outdoor learning and forest school areas, (including within school grounds) has a multitude of positive impacts on their learning and physical and emotional wellbeing. This needs to include reference to protecting, enhancing or creating school green space. Studies have found that connecting children with nature and green spaces benefits their intellectual, emotional, social and physical development, giving them the best possible start in life and improving employability.

It is expected play strategies to be formed by the character and function of the green spaces. It should be imaginatively designed and contoured using landforms, level changes and water, as well as natural materials such as logs or boulders, which create an attractive setting for play.

## 4.21 NPPF Reference to GI

The NPPF (2023) recognises the importance of green infrastructure within the planning system to support sustainable development in a number of ways. Paragraph 20(d) states that strategic policies should set out an overall strategy and make ‘sufficient provision’ for green infrastructure and in paragraph 96(c) looks to green infrastructure to support local health and wellbeing needs. Paragraph 159(a) states that GI can help in adapting to climate change, while paragraph 192 recommends that planning policies and decisions should identify opportunities to improve air quality through measures such as green infrastructure provision and enhancement. Paragraph 181 states, ‘Plans should...take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries’.

## 4.22 Social Equity and Inclusion

Facilities should be integrated and distributed throughout the development and, must compliment other provision (such as educational facilities, public realm etc.) as a part of the wider GBI/landscape scale network. This can include inclusive design not only for buildings and encouraging active travel, community engagement in the design of public open space and children’s play area to ensure its design provide recreational facilities for different users and age groups.

## 4.23 Stewardship

ECC Recommends that [paragraph(s) x and x] includes the reference to green infrastructure. Consideration will be needed regarding management and maintenance of any biodiversity habitat enhancements as part of the Biodiversity gain Plan. As stated through the Environment Act, 2021 Mandatory BNG will require that habitat is secured for at least 30 years via obligations/ conservation covenant

## 4.24 Strong GI Policy Wording and Coverage (GI Commitment)

ECCs GI team expects GI to be at the heart of the decision making at every stage in the planning process. GI should be considered at the earliest stage in the planning process and is expected to be incorporated into design guides and masterplans. Local Plan policy should be strongly worded and commitments to positive action and GI enhancement and protection. Avoid using words like ‘should’, ‘consider’, ‘where possible’, as it weakens the GI policy to deliver multifunctional green and blue infrastructure and risks being trumped by other infrastructure policies expressed as ‘must’, ‘required’ or ‘expected’.

## 5.25. Walkable Neighbourhoods

The Essex Design guide also provides guidance on walkable neighbourhoods where new neighbourhoods and streets are designed to promote the use of walking, cycling and sustainable transport. These places are planned to reduce the need to travel and include a mix of uses, green spaces and facilities to support the new development (within 15 – 120 minutes walking distance).

<https://www.essexdesignguide.co.uk/overarching-themes/garden-communities/walkable-neighbourhoods/>

# 5. GI Comments Compilation for Policy

(Neighbourhood Plans)

Several the comments for Local Plans above will also be relevant to Neighbourhood plans (NHPs), such as the recommendations to reference the Essex GI Strategy and Essex GI Standards, but the following are specific to NHPs only.

## 5.1 General NHP Introduction Comment

Neighbourhood Plans provide a significant opportunity for communities to recognise and recommend new GI as well as efforts to protect, improve and connect to existing GI. Planning for green spaces should be incorporated from an early stage in both the site selection and policy formation processes as an integral part of the wider planning

for the area. Whilst there are no statutory requirements for GI, the Government's 25 Year Environment Plan and Environment Act (2021) place significant importance on protecting and enhancing GI, its accessibility and mandatory biodiversity net gain.

## 5.2 Connectivity and Active travel

ECC supports the provision for connectivity and protection of active travel and Public Right of Way (PRoW) networks. ECCs GI team recommends that [Insert Name] Neighbourhood Plan supports and encourages opportunities to enhance and establish GI along sustainable transport and PRoW networks to both encourage active travel and create a green corridor for wildlife. This could include, but not be limited to, the integration of nature focused SuDS; native hedgerows, tree and shrub planting; incidental 'play on the way' features / trails; informal sport (outdoor gym/fitness trails); and areas for seating to stop and rest.

## 5.3 Protection and Provision of Green features and opens spaces

ECCs GI team supports, where possible, the protection and the retention of the existing environmental features as set out in the [Insert Policy name] Policy/Policies, but where trees/habitats/vegetation have been removed to be replaced elsewhere of the same value or better following the principle of right tree in right location.

There is no reference as part of the site allocation for the provision of green/open spaces or enhancement to existing provision.

## 5.4 Urban GI delivery through Sustainable Design

In addition to the provision of new GI and open spaces, GI can be integrated into urban environments for the benefit of people and nature through sustainable design. ECCs GI team recommends that the [Insert Name] Neighbourhood Plan supports the delivery of sustainable design elements, such as:

- Green Roofs/Walls: The provision of these features allow ecosystems to function and deliver their services by connecting urban, peri-urban and rural areas. Alongside biodiversity habitat creation, green roofs and walls can provide water storage capacity, flood alleviation and energy saving potential. In addition to buildings, these features can be provided on sustainable transport infrastructure (such as on bus stop/ cycle storage facilities).
- Wildlife Bricks: The provision of wildlife bricks creates habitats for invertebrates.
- Dual street furniture/seating (i.e., a bench including a planter): The design of the street furniture and bin stores can contribute to the landscape character, reduce clutter of an area or street and act as a green corridor/link to the wider landscape scale GI network

## 5.5 Social Equity and Inclusion/ Early Engagement

ECCs GI team supports the centralisation of protecting culture, heritage and developing a community spirit through the delivery of the GI. Whilst GI provides environmental and economic benefits, it also delivers social benefits via, physical and mental health and wellbeing improvement, social inclusivity through the provision of space for social interaction and public gatherings and, the improvement of community identity through the development of a sense of place. To ensure the community is key



in GI delivery, early and continued engagement with key stakeholders and community groups should be undertaken to ensure the GI approach outlined in the [Insert Name] Neighbourhood Plan reflects the needs and wants of residents.

## 5.6 Building with Nature

The neighbourhood plan could discuss means of assessing the sustainability performance of buildings through an accreditation scheme known as ‘Building with Nature’. This seeks to incorporate green infrastructure into development. This approach is a voluntary approach that enables developers to create places that really deliver for people and wildlife. It brings together guidance and good practice to recognise high quality green infrastructure at all stages of the development process including policy, planning, design, delivery, and long-term management and maintenance.

## 5.7 NEW POLICY: Green Infrastructure (Draft Example)

*A Green Infrastructure network of multi-functional high-quality green spaces and other environmental features (such as footpaths, street trees, play parks and village green) should be developed across the neighbourhood which together delivers multiple environmental, social and economic benefits, by:*

- contributing to the quality and distinctiveness of the local environment and landscape character,*
- be designed to deliver Biodiversity Net Gain and wider environmental net gains, that forms an important component of nature recovery networks and the wider landscape scale GI network.*
- ensuring opportunities for community socialisation to promote community cohesion and increase community safety,*
- creating a green wedge and buffer,*
- providing opportunities for physical activity, improving health and wellbeing and generally adding to quality of life,*
- adapting and mitigating against a changing climate and severe weather through the management and enhancement of existing habitats and the creation of new ones to assist with species migration, to provide shade during higher temperatures, reduce air pollution and for flood mitigation, and*
- encouraging a modal shift from car to walking and cycling by linking publicly accessible green space wherever possible (including through tree lined streets) to form walking and cycling routes.*

*Development will be required, where appropriate, to contribute towards the delivery of new green and blue infrastructure which develops and enhances a network of multi-functional spaces and natural features.*

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