

A Local Plan for

# Lancaster District

2020 – 2031

Plan period 2011 - 2031



## Green & Blue Infrastructure Strategy Addendum Initial Outcomes\_ Appendix 7 [March 2021]

## **BACKGROUND CONTEXT**

The purpose of this document is to set out how the initial principal findings of the GBI Strategy have been considered and used to make recommendations to inform the review of the policies within the Local Plan which specifically relate to green and blue infrastructure. These policies include:

- SC4: Green Space Networks
- SC5: Recreation Opportunity Areas
- DM43: Green Infrastructure
- DM45: Protection of Trees, Hedgerows and Woodland
- DM27: Open Space, Sports and Recreational Facilities
- SP8: Protecting the Natural Environment

A brief summary of the overarching findings of the GBI Strategy is outlined below.

### **SUMMARY OF WHAT THE GBI STRATEGY HAS HELPED TO ACHIEVE:**

- Recognised importance of incorporating blue infrastructure with green infrastructure, and the interlinkages between them and co-benefits of doing so (BI was acknowledged in our Local Plan GI definition but not much more than that, and it seems more pertinent now given the revised emphasis in the NPPF)
- Better understanding of the national and local strategies in relation to GBI and the planning policy context GBI sits within
- Identification of the existing GBI network across the District, including collation of datasets that will have never been mapped altogether before
- Getting key stakeholders involved in informing the direction that should be taken towards GBI in the District
- Recognising the importance of a GBI network, and importance of connecting spaces, corridors and chains
- Identification of different/multiple uses of GBI and the benefits and values these uses bring
- Identification of 6 key uses of GBI in our District (topic areas) to focus how we approach GBI (drawing numerous pieces of evidence together)
- Recognition that many GBI spaces are multi-functional and so it is not just one use for one space, and that in fact seeking to achieve the most uses out of a space (where appropriate) is a better use of the space (interlinkages), reaps more benefits and makes a valuable contribution towards the wider network and makes for a more resilient network against the impacts of climate change (and when considering pressures placed on land for development- given it is a finite resource)
- Recognising that corridors and chains can also be used for different purposes/functions
- Greater understanding of GBI in relation to the socio-economic picture in Lancaster e.g. looking at how provision of GBI relates to levels of deprivation/health etc.
- Importance of not only protecting the network and avoiding losses, but seeking opportunities for enhancement and extension of spaces and corridors (that are multi-functional)
- Understanding and highlighting what uses/functions seem to work well together in the same space

Continued...

- Raised awareness as to how GBI should be better incorporated into development proposals (and not just an 'after thought', fits in with revised NPPF about importance of place-making). Development design should take a 'GBI first' approach.
- Case Study examples, which acts as guidance for Developers, as to how the GBI network can be enhanced and extended)
- (Emerging) identification of specific projects/actions within the District that would help enhance and extend the wider network (i.e. projects that may help achieve future BNG requirements – provides an opportunity/place to set out a list of all kinds of GBI projects either in pipeline or potential for future)
- Sets the scene for upcoming Biodiversity Net Gain and Local Nature Recovery Network Strategies requirements that will come through the Environment Bill
- Sets out how could actually deliver GBI on the ground
- Provide a way of better monitoring GBI delivery across the District



## **POLICY SC4: GREEN SPACE NETWORKS**

### **The current policy**

Currently policy SC4 identifies 6 key greenspace networks (shown as green lines and points on the map to the right).

*“The Council has identified on the Local Plan Policies Map a number of greenspace networks that will be protected from development which would cause inappropriate harm and damage to their value and integrity”.*

The networks identified are:

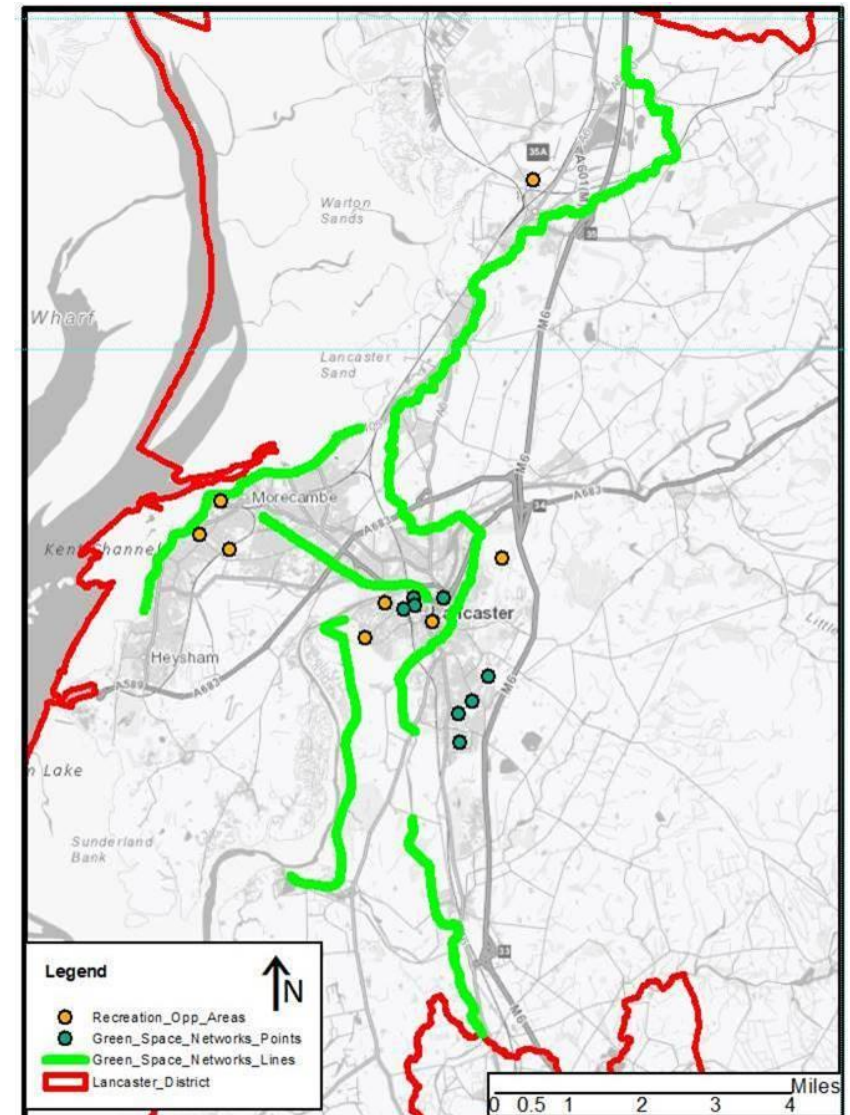
- MORECAMBE PROMENADE & HEYSHAM PROMENADE AND COASTLINE
- THE CHAIN OF OPEN SPACES SURROUNDING LANCASTER CITY CENTRE
- THE RIVER LUNE CORRIDOR FROM MARSH POINT TO GLASSON DOCK
- THE CHAIN OF OPEN SPACES ALONG THE BURROW BECK VALLEY
- LANCASTER CANAL
- THE LANCASTER TO MORECAMBE CYCLE TRACK & THE MORECAMBE RAILWAY TRIANGLE

The policy concludes *“The Council will investigate opportunities to improve and enhance the connectivity within these networks where appropriate to do so”.*

### **Policy review – commentary/recommendations**

The GBI Strategy highlighted the importance of blue infrastructure, as well as green, and so it is important to include reference to blue spaces as well within this policy.

Through the GBI Strategy a District wide green and blue infrastructure network for the entire Lancaster District has been identified, which is made up of green/blue spaces, corridors (clear linear features such as the canal) and chains. Therefore, it would be more appropriate to refer to the 6 key ‘networks’ identified above as ‘corridors’ and ‘chains’, which then contribute towards making up the wider GBI network.



As highlighted through the GBI Strategy, multi-functionality is a key feature of GBI. The policy would therefore benefit from this emphasis being added, as the more functions a space provides, ultimately the more benefits a space can provide. Particularly with regards to ensuring the GBI network is as resilient as possible to the impacts of climate change.

Importantly, the GBI network is District wide, and so the 6 identified 'networks' make up just part of that wider network. The policy should therefore be re-phrased to ensure it does not give the impression that this is a definitive list. Instead, it would be more appropriate to identify these 6 networks as 'key corridors and chains', acknowledging that more chains and corridors do exist across the District. An explanation as to why these are the 'key' corridors and chains should be provided within the supporting text (i.e. focussed in urban locations as these are the areas that face greatest pressure in terms of development and are thus the corridors/chains most under threat/most likely to be impacted).

Given the recommendation to include *blue* spaces, corridors and chains given it is a GBI Strategy, additional 'key corridors/chains' should be explored. Based upon the GBI mapping the following recommendations are made:

- Stretch of Lancaster Canal missing in Lancaster (i.e. not currently identified under policy SC4)
- Extend 'chain of open spaces along the Burrow Beck Valley' to identify slightly longer chain extending into South Lancaster
- River Lune
- River Conder
- River Keer

The latter 3 of which were all identified as key waterways in the GBI Strategy. Additionally, the GBI mapping exercise highlighted some additional green spaces/chains/corridors:

- Extend 'The River Lune corridor from Marsh Point to Glasson Dock', i.e. Millennium Cycle path, from North Lancaster to Caton
- Chain of Green Spaces around Lancaster City Centre (update previous as there is an evident 'green ring' that encircles Lancaster city centre, previously only spaces around Castle were identified)

The policy also included a specific commitment on behalf of the Council to "*investigate opportunities to improve and enhance the connectivity within these networks where appropriate to do so*". As the purpose of this review is to look at how the policy might be revised in light of the evidence base documents compiled specifically to address how planning policy could be amended in light of the Climate Emergency declaration, it was considered that the most appropriate approach to take towards reviewing this policy was to focus upon these 6 'networks' and explore how the connectivity within these networks could be enhanced and improved. The GBI Strategy identified 6 key themes/functions of GBI and so these have been applied when considering how these corridors could be improved/enhanced (suggestions set out in the Table below - Black 'X' represents current function, Red 'X' represents function that could be improved/enhanced)

Connectivity wise it is considered that these corridors and chains are already well connected. Instead, the analysis of the mapping shows that with regards to ‘investigating opportunities to improve and enhance’ these corridors and chains, the focus should be upon improving and enhancing their **multifunctionality**, where appropriate.

Corridors (stretch of network)	Connectivity	How planning policy could improve/enhance the connectivity and functions of spaces within these corridors (i.e. maximise GBI benefits to aid climate change adaptation/mitigation)					
		Landscape	Historic Environment	Ecology	Water Management	Recreation	Active Travel
<b>Morecambe Promenade &amp; Heysham Promenade &amp; Coastline</b>	Continuous linear corridor	X (more landscaped areas/enhanced along route/trees)	X (provides setting around historic assets such as Midlands Hotel, prom itself a historic, renowned feature of Morecambe)	(ecologically want to keep separate from Bay for recreational pressure purposes)	X (flood defences)	X (popular flat walking route with parks and play areas on route)	X (popular flat, long linear cycling route, connects Morecambe and Heysham)
<del>The chain of open spaces surrounding Lancaster City Centre</del> (Updated below)	-	-	-	-	-	-	-
<b>The River Lune corridor from Marsh Point to Glasson Dock (look to extend to Caton)</b>	Continuous linear corridor	X (dependent upon route could be improved within urban areas. Saltmarsh are valuable carbon store)		X (much of route naturally floods–potential opportunities for biodiversity net gain)		X (popular walking route along River Lune Estuary)	X (popular cycling route along River Lune Estuary, connects Glasson Dock to Lancaster, now Caton and potentially beyond)

Corridors (stretch of network)	Connectivity	Landscape	Historic Environment	Ecology	Water Management	Recreation	Active Travel
<del>The chain of open spaces along the Burrow Beck Valley</del> (Updated below)	-	-	-	-	-	-	-
Lancaster Canal (including stretch not currently shown in SC4 Lancaster)	Continuous linear corridor	X (potential for landscaping to be improved along length of canal and relationship with adjoining development)	X (many of bridges are listed potential to enhance their setting)	X (is a BHS but ensure is protected as such)	X (possibilities to be explored)	x	x (but could be improved)
Lancaster to Morecambe Cycle Track & the Morecambe Railway Triangle	Continuous linear corridor	X (densely populated with trees along its length)	X (historically a railway line)	X (potentially more could be done from an ecological point of view)		X (recreational use could be enhanced)	X (connects Morecambe and Lancaster)
(NEW)Chain of Green Spaces around Lancaster City Centre	(Visually) Coherent chain of green spaces	X (more trees could be planted)	X	X (potentially more could be done from an ecological point of view)	X (exploration as to whether spaces could be better used for water management purposes)	x (provides accessible green space close to densely populated areas, potential in these areas to increase opportunities for food growing and 'types' of recreational uses)	

Corridors (stretch of network)	Connectivity	Landscape	Historic Environment	Ecology	Water Management	Recreation	Active Travel
<b>(NEW) Chain of Blue and Green Spaces along Burrow Beck</b>	Continuous chain along Burrow Beck	x		x	X (potential to be enhanced for water management purposes)	X (accessibility could be improved along lower stretches i.e. BGV area)	
<b>(NEW) River Conder</b>	Continuous linear corridor	X ( Key feature in landscape as a key waterway, Trees along much of length of Conder)		X (potentially more could be done from an ecological point of view)	X (potential to be enhanced for water management purposes)	X (recreation/ accessibility could be improved along lower stretches of Conder i.e. BGV area)	
<b>(NEW) River Lune</b>	Continuous linear corridor	X (Key feature in townscape, <b>need to protect salt marsh as are valuable carbon sinks</b> )	X (Setting for historic evolution of Lancaster)	X (Part of River Lune (estuary) is a SSSI, SPA, SAC and Ramsar site)	X (potential to be enhanced for water management purposes)	X	X (Public Rights of way along significant lengths of Lune <b>could be enhanced/extended</b> )
<b>(NEW) River Keer</b>	Continuous linear corridor	X (Key feature in landscape as a key waterway)		X (Part of River Keer is a SSSI, SPA, SAC and Ramsar site)	X (potential to be enhanced for water management purposes)	X (opportunities for recreation/open space enhancement along river bank e.g. policy DOS8)	X (Public Rights of way along significant lengths of Keer <b>could be enhanced/extended</b> )

Again, whilst this isn't an exhaustive list of key GBI corridors and chains within the wider GBI network, given the nature of the Strategic Policies and Land Allocations DPD, the purpose of policy SC4 is to spatially identify the strategic corridors and chains on the Local Plan Policies Map and it will be the role of DM43 to specifically outline how impacts on the green and blue infrastructure network elsewhere within the District will be addressed.



### **Policy approach options:**

- Do nothing i.e. keep the same
- Just change 'networks' to 'chains' and 'corridors' to acknowledge they're part of a bigger District-wide GBI network & add reference to blue spaces as well
- Leave current list of 6 identified 'Greenspace Networks'
- Add to list of identified 'green and blue space corridors and chains' – to reflect findings of mapping exercise, incorporate blue infrastructure (and show not all about linear connectivity) – will subsequently need to update criteria as currently only refers to green spaces. (Although environmentally designated sites such as SPA's/ SSSI's BHS's haven't been identified, doesn't mean they aren't important parts of GBI network, but they're already protected). Based upon findings of GBI Strategy, suggested criteria:
  - Location within or adjacent to urban areas most under pressure from new development
  - Strategic scale and nature
  - Clear unifying features, with visible linear or circular connectivity
  - Multifunctional i.e. spaces within chain or corridor fulfil more than one function/key use identified in the GBI Strategy

### **The current supporting text**

Paragraph 23.17 states that *“There are a number of greenspace networks and recreational open space systems. These can form chains of parks, school playing fields, dedicated cycle and pedestrian routes, canal towpaths, allotments, community growing spaces, orchards and private open spaces”*.

Paragraph 23.18 outlines the criteria that was used to identify the 6 green space networks. *“These greenspace systems can form the basis of a network of open spaces for recreation, biodiversity and the development of the district's walking and cycling network and have been identified using the following criteria:*

- *Forming a chain of 3 or more individual green spaces;*
- *Areas that are strongly linear with clear unifying features;*
- *Comprising open land within or adjoining urban areas of visual, recreational or biodiversity importance;*
- *Related to cycling and walking networks;*
- *Areas that include significant open land in areas of recreational open space deficiency;*
- *Areas that provide a setting for important townscapes”*

### **Supporting text review – commentary/recommendations**

As previously stated, the GBI Strategy has identified the important role of blue infrastructure and effectively warns against just solely focussing upon green infrastructure. Emphasising how spaces can be multi-functional with regards to the green and blue infrastructure services that they provide. Therefore, it is important that the supporting text acknowledges the existence of blue infrastructure within the GBI network, and the types of blue spaces these corridors and chains may include, in addition to green spaces. For example, the actual Lancaster Canal itself and not just the towpath.

It is also recommended that further detail from the GBI Strategy is incorporated within the text that supports this policy. Particularly with regards to highlighting the importance of acknowledging, maintaining and enhancing the existing wider network where appropriate and also the multi-functional benefits these spaces can provide to both humans and nature when effectively harnessed, which is what the Strategy aims to ensure is considered at an early stage of the design of development proposals coming forward. The 6 key themes which encapsulate the functions and uses of green and blue spaces across the District should also be outlined within the supporting text, particularly useful to help plan for the future of green and blue infrastructure given the breadth of uses of green and blue spaces, and subsequently corridors. As the supporting text highlights, these spaces may effectively form more ‘chains’ than ‘corridors’ and so the reference to both should be included, as one is considered more linear and the other circular. However, the key aspect of both is the connectivity of the spaces within these, and how this can then facilitate the movement of both humans and nature, and the increased resilience in the face of climate change impacts.

Currently it is acknowledged that greenspaces can form the basis of networks for ‘recreation’, ‘biodiversity’ and ‘walking and cycling’. However, as the GBI Strategy has demonstrated, there are three additional key functions of GBI in the Lancaster:

- Water management
- Landscape
- Historic Environment

Therefore, it is important that these are also set out in the supporting text. Looking more closely at the list of criteria used to identify the current greenspace networks, there is tenuous references to landscape and to an extent the historic environment. However, these should be set out more clearly.

As such the GBI Strategy has not set a list of ‘criteria’ which spaces/corridors/chains must meet in order to be considered part of the network, primarily due to the extent and variety of these spaces. There isn’t a one size fits all approach and so such a prescriptive methodology has not been established in the GBI Strategy. The Strategy demonstrates the wealth of data that can be inputted to identify the existing GBI network. However, there are key strategic corridors and chains that help make up the wider network, and this is acknowledged and is the purpose of policy SC4. As set out in the policy commentary given the recommendation to incorporate blue spaces and not just green, the specific criteria (methodology) has been revised as set out in the policy options, and this should be detailed within the supporting text so that the justification for their inclusion is clear.

## **POLICY SC5: RECREATION OPPORTUNITY AREAS**

### **The current policy**

Policy SC5 currently reads:

*“Through future development proposals the Council will investigate the potential to provide significant new or improved open space in the following areas of deficiency.*

*CENTRAL MORECAMBE (VIA THE MORECAMBE AREA ACTION PLAN DPD)*

*CENTRAL LANCASTER (VIA ‘BEYOND THE CASTLE’ PROJECT)*

*LAND AT WILLOW LANE / CORONATION FIELD, LANCASTER*

*MORECAMBE WEST END*

*WESTGATE AREA, MORECAMBE*

*MARSH AREA, LANCASTER*

*LAND AT FORMER THOMAS GRAVESON SITE, WARTON ROAD, CARNFORTH*

*EAST LANCASTER STRATEGIC SITE*

*The Council will work with all key stakeholders and the local communities to investigate opportunities for improvement, expansion or creation of recreational facilities in the areas identified above.”*

### **Policy review – commentary/recommendations**

As identified through the GBI Strategy, there are many different uses of green and blue spaces within the District, and so 6 key themes/topic areas were identified to capture all of those uses, so that a thematic approach could be adopted to produce the Strategy. Of those 6 key topics, ‘Recreation/Accessible Greenspace’ was one of them. Currently policy SC5 only relates to recreational open spaces. Following on from the findings of the Strategy, the policy could benefit from highlighting the need to consider the multifunctional value of such spaces and how this in turn helps combat climate change.

Once again, the locations identified in this policy are urban focussed.

Interestingly the policy says the ‘Council will investigate’ and states that this will be done by working with all key stakeholders and local communities, an approach which is advocated through the GBI Strategy, as the importance of an inter-disciplinary approach to GBI is highlighted.

The policy then closes with another commitment from the Council to “work with all key stakeholders and the local communities to investigate opportunities for improvement, enhancement or creation of recreational facilities in the areas identified above’. One of the key purposes of the GBI Strategy is to

investigate ways in which the existing GBI network can be improved from an enhancement, extension (including creation) point of view. However not solely for recreation. Whilst each of the themes were addressed in turn through the Strategy, open spaces are still considered as part of the wider GBI network. At this stage the GBI Strategy just sets out the key principles as to how improvements could be made within the District, supplemented by an interactive map which indicates where these opportunities for improvement may exist, but at this stage an in depth and fair analysis for each topic area to identify where there may be specific deficiencies has not taken place. Whilst projects which provide such opportunities are identified in the 'Delivering the Strategy' section, this is a list of known projects and so not a definitive list.

#### **Policy approach options:**

- **Leave as it is** – how climate change related is it? – availability of open spaces for recreation can help encourage lifestyle changes, if on their doorstep don't need to then travel far to access green space & such spaces contribute to resilience of wider GBI network
- **Re-appraise current identified areas** (using KKP evidence which came forward after this policy – can spatially map accessibility buffers identified by KKP & also use findings from GBI Strategy linked to areas of deprivation & see if there are any trends in relation to availability of open space – help address food poverty and support community food growing, reducing food miles to help combat climate change)
- **Assess to see whether there are 'new' areas** of deficiency with regards to 'recreation' and re-appraise the current ones
- **Consider whether we should be identifying other types of 'opportunity areas'** in relation to the other GBI themes (e.g. ecology/landscape/active travel/water management/ historic environment) – but not all that quantifiable, and really through the GBI Strategy the Council is seeking to promote opportunities anywhere within the District where it is considered possible/appropriate – so don't necessarily want to quantify and provide a definitive list because that would be difficult to evidence (keep up-to-date) and would suggest there aren't deficiencies elsewhere – policies should seek to ensure entire GBI network is the best it can be.
- **State in policy that consideration should be given to the multifunctionality of these spaces** – not just purely focus upon recreation

#### **The current supporting text**

Paragraph 23.19 states that: *"Opportunities for improvement are set out within Policy SC5 and illustrated in figure XX of this DPD where both qualitative and quantitative improvement could allow for opportunities to start to address the deficiencies in open space and recreation within the district and provide improvements to existing provision."*

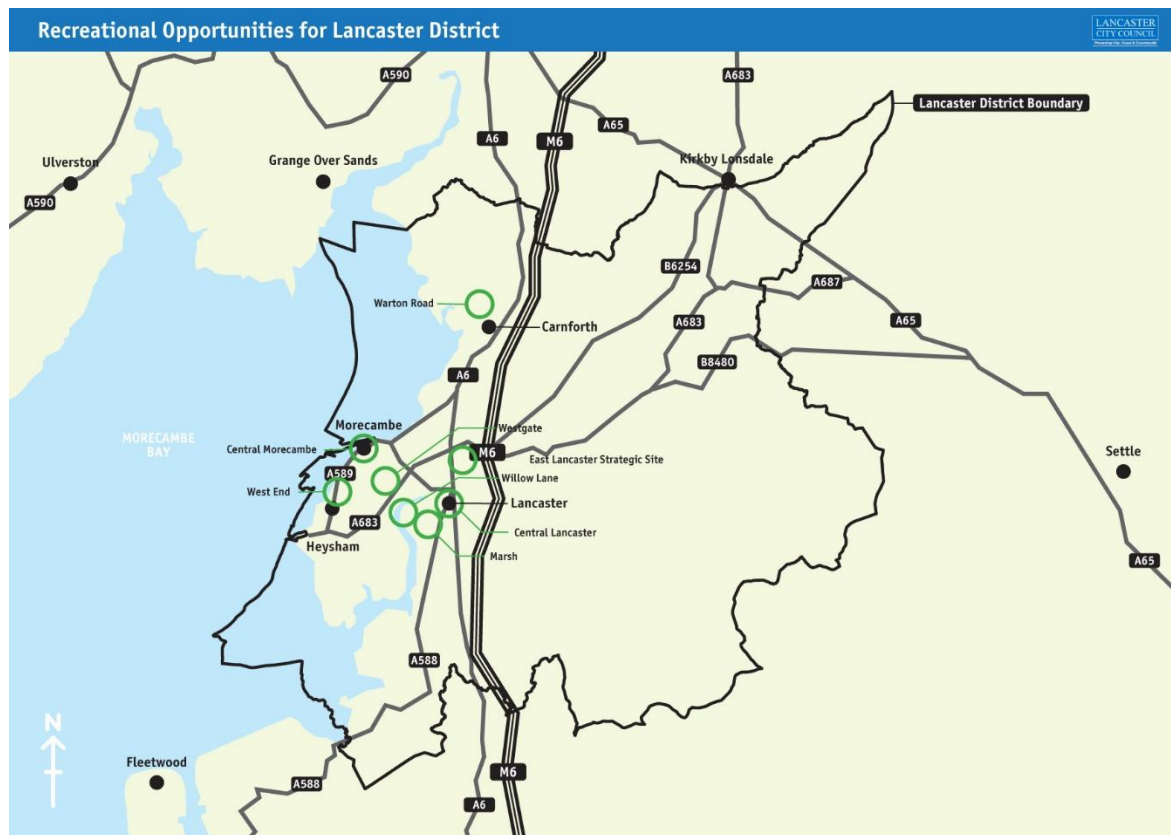


Figure 32.2 Recreation Opportunity Areas in Lancaster District

**Supporting text review – commentary/recommendations**

There is no mention of ‘accessibility’ improvements in the supporting text. As emphasised within the GBI Strategy, and in the KKP Study, accessibility is key. (KKP set out accessibility standards). Not just about quantity and quality/value of open spaces, people need to be able to access them. The supporting text could be updated to include this point. Although, it is acknowledged through the Strategy that this is to be explored further.

It is important to ensure these policies are deliverable. So, it would be helpful to suggest ways in which qualitative and quantitative improvements could be made, also making reference to KKP Open Space Assessment and Playing Pitch Strategy? At the same time, there is a need to be mindful that this is just a



partial review, with a specific focus upon climate change. Therefore, at this stage it would be beneficial for the supporting text to highlight the ways in which the opportunity areas identified in policy SC5 could be improved and enhanced from a multifunctional perspective of delivering benefits for climate change too, based upon the findings of the GBI Strategy (6 key themes).

It could also be an opportunity within the supporting text to explain the benefits of better recreation provision from a climate change perspective.

## **POLICY DM43: GREEN INFRASTRUCTURE**

### **The current policy**

Policy DM43 currently reads:

#### **Green Spaces and Green Corridors**

*The Council seeks to prevent the fragmentation and isolation of Green Infrastructure.*

*To achieve this the integrity and connectivity of the Green Infrastructure network will be managed, maintained, protected and enhanced. Opportunities to extend the framework of green spaces and green corridors in the district should be taken and development proposals that will result in damage to the integrity of or severance of a green corridor will be resisted by the Council.*

*Individual green spaces should be retained wherever possible, particularly in relation to spaces that have a recognised value, whether this is a community or environmental value.*

*Any development proposal that involves the loss of designated green space will be resisted by the Council. Development proposals should seek to integrate green spaces and green corridors into development proposals and forge linkages with existing green space networks.*

*In exceptional circumstances, the loss of green spaces and green corridors will only be considered acceptable where appropriate mitigation measures are provided. This would include replacement habitat / provision being provided which is of an equal or better standard (in both quantitative and qualitative terms) than existing.*

*Development proposals should incorporate new and/or enhanced amenity green spaces of an appropriate type, standard, size and reflects the needs / deficiencies for the area as set out within the Councils Open Space Assessment or successor documents. Proposals will be expected to give due consideration to the requirements set out in Policy DM27 and Appendix D of this DPD and, where appropriate, the requirements of site specific polices contained in the Strategic Policies and Land Allocations DPD.*

*Where on-site amenity green space provision has been demonstrated to not be possible, or the Council is satisfied that on-site provision is not beneficial or appropriate, financial contributions will be sought towards the creation of new facilities off-site or to enhance and improve existing provision to meet the needs of the community.*

#### **Allotment Provision**

*Existing allotments, which are recognised to have significant value to the local community will be protected and, where appropriate, improved. The Council will support the provision of new allotment facilities and other food growing places where opportunities arise and a clear need is demonstrated via local evidence.*

### Garden Provision

*The Council recognises that garden space, particularly within urban areas, is a vital source of green space to residents and of significant importance to natural habitats. The loss or reduction of garden spaces in urban areas could lead to a decrease in the quality of life and a significant impact on the natural environment. In accordance with paragraph 53 of the National Planning Policy Framework the Council will resist proposals that will involve the loss of garden spaces to built development where it will result in harm to the local environment and amenity.*

### **Policy review – commentary/recommendations**

The GBI Strategy has highlighted the importance of both green and blue infrastructure, and so this policy needs to be re-named to reflect this and all references to green spaces to also include blue spaces. There are important interlinkages between the two, and so it's not just about protecting the loss of green spaces but also the loss of blue spaces, and recognising their value too.

There is a requirement for greater emphasis upon the importance of the wider GBI network (of which green spaces, corridors and chains contribute) and connectivity. Also, on the other hand, whilst a green or blue space may not necessarily be part of the identified existing network it still has a value, and could potentially be part of the network in the future, and so should be protected (i.e. it could be an opportunity area in the future).

It would also be useful to provide a policy hook within this policy to the GBI Strategy to encourage it to be used by Developers when designing up their development proposals, given the emphasis is really on delivery onsite, rather than offsite contributions for GBI provision/enhancement of existing. Also justifies the inclusion of the term 'network' as the GBI Strategy has been used to identify the existing 'network' that is referred to and identify the different uses of GBI.

There is also a need for greater emphasis upon the quality and value of the District's green and blue spaces, acknowledging that these spaces are valued in different ways for different purposes and so they aren't just simply a space, as has been revealed through the GBI Strategy. Hence the multifunctionality of these spaces also needs to be highlighted, and maximising benefits for both humans and nature from GBI spaces.

Within the policy it would be beneficial to specifically list each of the 6 key uses/themes and state something along the lines of '*When designing green and blue infrastructure (GBI) provision as part of a development proposal, consideration should be given the six key uses and values of GBI identified within the District through the GBI Strategy and how this will then help contribute towards mitigating and adapting to the impacts of climate change:*

- *Recreation*

- *Ecology/Biodiversity*
- *Landscape*
- *Historic Environment*
- *Active Travel*
- *Water Management*

On the reverse side, this will also encourage greater consideration to be given to the uses of GBI that may be lost (based on the 6 key uses identified in the GBI Strategy) and how these should be taken into account when looking into replacement provision.

To set out a list of criteria based upon the themes, would be difficult due to the site-specific nature of the most appropriate GBI uses. It is really about making sure that through the policy the most appropriate uses a space could provide are considered and where possible provided.

Policy DM43 currently only specifically refers to amenity green space, allotments, and gardens. It's important to keep private gardens in there as this is something the GBI Strategy intends to explore in the future. Allotments were one of the key outcomes of the Climate Change People's Jury and are considered to be an important way in which we mitigate and adapt to the impacts of climate change, encouraging local food growing. Amenity greenspaces are considered to be the bare minimum onsite provision of green/open space, hence their inclusion. The policy specifically mentions open space because this is the only type of GBI we currently have specific standards for, but as a result of the GBI Strategy, the policy should seek to emphasise that there are other 'types' of GBI to consider (not just those specifically listed).

The policy wording refers to 'recognised value'. It would be beneficial to expand on this further within the supporting text and link to the 6 key themes and ultimately climate change i.e. what do we mean by 'climate change adaptation/mitigation value' (a toolkit has since been produced to help with this and can be found in Appendix 5 of the GBI Strategy). This would help provide further justification for such assets to be retained.

The management and maintenance of GBI is key to ensuring the intended benefits of GBI are delivered and secured in perpetuity, and so to make sure this happens it would be useful for the policy to state that a Management and Maintenance Plan will be required to be submitted.

Appendix D needs to be updated to reflect the latest KKP evidence.

#### Things that cannot currently be changed in DM43:

- The final paragraph of policy DM43 refers to open space standards. As this is not a full Local Plan Review we're not able to introduce specific standards for GBI due to the potential impact this could have upon housing allocations/numbers/density, and so this would need to be considered as part of a full local plan review. However, it is recognised that GBI should, where possible, link up to existing GBI network, and multiple benefits should be sought from a space (as this doesn't necessarily affect the amount of space used – instead encourages a re-think of how amenity spaces,

for example, should be looked at i.e. not just one use for one space) Open space standards are the only ones that have specifically been previously set/established.

### **The current supporting text**

Currently paragraphs 11.3-11.13 state:

*11.3 Green Infrastructure is a wide-ranging term that can encompass a number of environmental features including open spaces, recreational areas, parks and gardens, allotments, biological and geological conservation sites, landscape features, rivers, canals and watercourses, woodland, street trees and planting, orchards, village greens, green roofs and walls, cycle routes, pedestrian walkways and Public Rights of Way (PROW), green corridors and open countryside. This, however, is not a definitive list of the types of Green Infrastructure assets. The National Planning Policy Framework defines Green Infrastructure as 'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities'. Policy DM43 sets out the beneficial roles of green spaces and green corridors can contribute to in the locality.*

*11.4 The Council will retain a presumption towards the retention and protection of green spaces and green corridors, particularly where it can be demonstrated that they provide value, either economically, environmentally or socially, to the community they serve. Opportunities to enhance and extend these natural assets should also be sought and will be supported by the Council. Development proposals that involve the loss of such spaces will be resisted by the Council unless it has been demonstrated that the benefits that the proposal provides outweigh the loss of open space and the lost open space is replaced with facilities of equal, if not better, standard than those existing in a suitable, nearby and accessible location.*

*11.5 The Council published a new Open Space Assessment for the district (prepared by KKP consultants and published in 2018) and a Playing Pitch and Outdoor Sports Strategy (also prepared by KKP consultants and published in 2018). These provide an up-to-date position on open space and recreation matters that will be relevant in the determination of future planning applications. These assessments are considered to represent key pieces of evidence in relation to this topic and therefore the Council will expect applicants to have due regard to their content and recommendations of these documents or other successor documents on this topic area.*

*11.6 Development proposals should be considered against the requirements for on-site provisions and off-site financial contributions, which are set out in Appendix D of this DPD. The requirements set out in Appendix D are based on national standards and will be used as a basis for discussion for negotiations between the Council and applicants. Consideration should also be given to the Planning Advisory Note (PAN) on this matter. Issues of viability will be given consideration within the negotiation process with both commercial and residential development proposals expected to make contributions toward improvement of green infrastructure.*

*11.7 In considering the issue of viability, development proposals should consider whether it is appropriate to provide either on-site provision or financial*



*contributions to the enhancements and improvement of existing nearby facilities. Dialogue is recommended between applicants and the Council to inform the understanding of open space requirements in the local area.*

*11.8 Development that forms part of a strategic land allocation, as identified in the Strategic Policies & Land Allocations DPD, should take direction from the specific policies relating to the site (and Masterplan if applicable) in relation to open space requirements.*

#### Local Food Growing & Allotments

*11.9 Allotments are an important element of open space and offer a significant range of benefits for people, communities and environments. They provide recreational value to their users, support local biodiversity, contribute toward the urban landscape, contribute to the physical and mental well-being of their user, provide the opportunity to grow fresh produce and contribute toward a healthy lifestyle that is active, sustainable and socially inclusive.*

*11.10 There are currently 21 allotment sites within the district, providing approximately 19 hectares of land for the growing of food. Despite this provision, there remains a waiting list and the demand for allotment sites continues to increase, with the greatest levels of both supply and demand in the Lancaster area.*

*11.11 From a planning perspective, the Council will address such demand through new development, in particular larger development proposals that will be able to accommodate provision for new allotments and community growing spaces.*

*11.12 Allotments can play a key role in increasing levels of physical activity across the district, providing an alternative to formal sporting activities. In light of the recognised need for additional provision of allotments across Lancaster, innovative approaches to increasing provision should be considered, including links and partnerships with local schools where opportunities to do so exist. The value of allotments as a social opportunity and an alternative option for exercise is recognised by the Council. The location of allotments at schools should be investigated as a potential solution to the provision of new facilities, particularly in rural locations.*

*11.13 The Council will continue to seek to address this deficiency through the more efficient use of existing provision and the identification of new sites for this purpose in areas of need. The development of new housing, particularly in the South Lancaster area as set out within the relevant policies of the Strategic Policies & Land Allocations DPD, will be expected to address specific needs in this locality.*

#### Supporting text review – commentary/recommendations

It would be useful to include some historic environment features within the list of GBI assets to make sure all six topics areas covered e.g. Registered Parks and Gardens.

Through the current Local Plan, the Council adopted it's own Green Infrastructure definition: *Green infrastructure is a strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services such as water purification, air quality, space for recreation and climate mitigation and adaptation. This network of green (land) and blue (water) spaces can improve environmental conditions and therefore citizens' health and quality of life. It also supports a green economy, creates job opportunities and enhances biodiversity.* This definition does refer to the role of blue spaces and so would be good to now call it Green and Blue Infrastructure (GBI). This could be used to expand on the NPPF definition, to highlight the importance of incorporating blue with green. Throughout the supporting text, wherever green spaces are referred to, blue spaces should be also.

*"The Council will retain a presumption towards the retention and protection of green spaces and green corridors, particularly where it can be demonstrated that they provide value, either economically, environmentally or socially, to the community they serves".* Perhaps should be re-phrased the other way, *'unless it can be demonstrated that the site has no value, either economically, environmentally or socially and is unable to provide any benefits in terms of climate change mitigation and/or adaptation'*? The phrase 'where it can be demonstrated that they provide value' sounds like the onus is on the applicant to demonstrate the value yet they are likely applying to develop the site and potentially remove the value, so the onus should be on the applicant to demonstrate that the site has no value.

Instead of specifically referring to 'open spaces' in paragraph 11.4 reference should be to 'green and blue spaces' to avoid confusion that this may only relate to designated open spaces (as per policy SC3) but should in fact relate to all green and blue spaces.

Appendix D is to be updated to reflect the KKP evidence that is currently in the Open Space PAN. It would also be useful to make it clear that paragraph 11.6 like 11.5 also refers to open space and playing pitches. With regards to Playing Pitches, the Sport England Playing Pitch calculator is to be used. Although the last sentence states 'proposals expected to make contributions toward improvement of green infrastructure'. It is currently unclear whether this sentence is relating just to open space/playing pitches, or the intention is for all 'green infrastructure'. At this stage it is not considered possible to set specific standards for green infrastructure due to the nature of conducting a partial Local Plan Review. Perhaps following on from this, there is an opportunity to stress that the requirement/preference is for onsite GBI provision. Paragraph 11.7 then reverts back to discussing specifically open space. Really all developments should be able to incorporate some form of GBI and it's about maximising the uses and benefits that GBI can produce, so that it's the best it can be.

Paragraph 11.8, which refers to the strategic site allocations, would benefit from reference to wider GBI requirements as well as open space.

It is important to keep the text that relates specifically to local food growing and allotments (paragraphs 11.9-11.13) given this topic is referenced numerous times in the Climate Change People's Jury recommendations. It would also be good to make reference to the climate change benefits as well as the social benefits.

In addition to the text that already exists, based upon the findings of the GBI Strategy, it would be good to make reference to the 6 key themes, and the benefits they can provide from a climate change perspective (a GBI toolkit has since been produced to help with this, as shown in Appendix 5 of the GBI Strategy). The multi-functionality of GBI needs to be emphasised in the supporting text more, and how a 'GBI first' approach should be adopted when designing development proposals. Also, the importance of connectivity, and how such spaces/corridors/chains then contribute towards creating a wider GBI network that is more resilient to climate change. It would also be useful to make specific reference to the GBI Strategy itself, and explain how the role of this Strategy was to identify the existing District-wide GBI network and from that identify potential opportunities for improvement (enhancement/expansion/creation)

If a Green and Blue Infrastructure Management and Maintenance Plan is to be requested, it should be set out in the supporting text of this policy what is meant by this.

The role of the interactive GBI map is to spatially locate opportunity areas for the expansion and/or enhancement of the GBI network and thus will become a tool that can be used to implement this policy, and aid with monitoring.

## **POLICY DM45: PROTECTION OF TREES, HEDGEROWS AND WOODLAND**

### **The current policy**

Policy DM45 currently reads:

#### **“Protection of Trees, Hedgerows and Woodland**

*The Council will support the protection of trees and hedgerows that positively contribute, either as individual specimens or as part of a wider group, to the visual amenity, landscape character and/or environmental value of the location.*

*The Council will also protect ancient trees and ancient woodland, supporting opportunities which increase the resilience of all woodlands to Climate Change, pests and diseases.*

*New development should positively incorporate existing trees and hedgerows. Where this cannot be achieved the onus is on the applicant to justify the loss of trees and hedgerows as part of their Arboricultural Implications Assessment (AIA – further guidance as to the content of such an assessment is provided within the Council’s Planning Applications Validation Guide). Where the loss is adequately justified the Council will seek replacement tree planting at the ratios adopted in the Council’s Tree Policy (2010), or successor documents.*

#### **Encouraging Tree and Hedgerow Cover**

*The Council will expect appropriate opportunities to encourage the planting of new trees, hedgerows and woodland, making use of indigenous species, throughout the district in an effort to mitigate against the impacts of Climate Change, and to enhance the character and appearance of the district.”*

### **Policy review – commentary/recommendations**

It is recognised that trees can play a key role in our ability to mitigate and adapt to the impacts of climate change. Therefore, it would be beneficial for this to be referenced in the first sentence of the policy.

The phrase ‘The Council will expect appropriate opportunities to encourage the planting of new trees’ needs re-phrasing. To use the words ‘expect’ and ‘encourage’ when referring to the same thing is confusing. Following the outcomes of the GBI Strategy, tree planting should be expected where appropriate, and not simply be encouraged given the Climate Emergency context of the Local Plan Review.

Greater emphasis should be placed on the consideration of new trees when designing a proposal, considering the multiple benefits trees can provide, particularly from a climate change perspective. (These benefits could then be set out within the supporting text). Whilst reference is made to enhancing the character and appearance of the District, it's seems a large scale to be referencing, and so it would seem more appropriate to say 'and positively contribute towards the local character and landscaping of the site'.

### **The current supporting text**

Paragraphs 11.31 to 11.40 state that:

*"11.31 The district has many fine examples of important and significant trees, which may be defined as trees that are ancient, of veteran status, of historic importance or rare. Trees are also a wildlife resource and are notable for their contribution to the landscape character and visual amenity of an area. The Council will actively seek to protect these significant trees from development that would involve their loss or harm. The protection of significant trees has many benefits economically, socially and environmentally including their contribution to the reduction in atmospheric carbon dioxide levels and mitigation of climate change.*

*11.32 The majority of trees within the district are not protected by Tree Preservation Orders (TPOs) or located within designated Conservation Areas. However, this does not mean that non-designated trees are not considered to be significant and worthy of protection from loss or harm.*

*11.33 Development proposals should incorporate existing and notable features, such as significant trees within their proposals. The retention of existing trees can assist in providing context and character to a development and ensure that the proposals respect the character and value of the surrounding landscape and townscape. The Council will resist the loss of trees within development proposals, particularly where it can be demonstrated that appropriate alternative design solutions exist that can allow for retention and incorporation of such features into the overall design of a new development.*

*11.34 The Council will support the retention of existing trees within development proposals. However, where it is adequately demonstrated that retention is not possible or feasible to achieve, and the loss does not involve trees that are of significant value, then consideration will be given to whether suitable mitigation measures would compensate for the losses sustained. In making this assessment, the Council will have regard to the provision of its Tree Policy<sup>1</sup>, adopted in 2010, and the replanting ratios contained therein.*

*11.35 Any development proposals that have implications for existing trees must be accompanied by an Arboricultural Implications Assessment, which should set out the potential impacts and implications for existing trees that may arise from a development proposal. The assessment must also include measures to*

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<sup>1</sup> <https://www.lancaster.gov.uk/planning/trees/tree-policy>



*protect trees and provide appropriate mitigation measures.*

*11.36 Although a felling licence is not required from the Forestry Commission if full planning permission is granted, the Forestry Commission remain a non-statutory consultee on development that either directly affects or is within 500 metres of ancient woodland. Consent from the Forestry Commission may also be required under the Environmental Impact Assessment (Forestry) Regulations if the proposed development involves afforestation, deforestation, forest roads or forestry queries.*

#### Hedgerows

*11.37 Hedgerows contribute significantly to the natural environment and landscape character of an area and can provide important habitats for a range of species, provide shelter, and help reduce noise and atmospheric pollution. They add to the character and quality of the local environment and can have significant historic value. As with the protection of trees, these assets should be retained and, through proposals incorporated into development schemes. Where possible, opportunities should also be sought to extend these valuable ecological networks by increasing and enhancing hedgerow cover.*

#### Increasing Tree Coverage

*11.38 Tree cover across the district was estimated to be approximately 6.9% in March 2010 (Woodland Trust) compared to 9.9% for England. Through the course of this plan period the Council will seek to increase the level of tree cover across the district in an effort to mitigate and adapt to the impacts of climate change.*

*11.39 Whilst it is recognised that large portions of the district include upland areas the level of tree cover in the district is still significantly less than the national average. The Council will therefore explore opportunities for growth in the level of tree cover where appropriate locations exist. There will be many opportunities to achieve this. The increased provision of trees in new development, through suitable and appropriately designed landscaping schemes, is a key component of delivering growth in tree cover.*

*11.40 Development proposals will be encouraged and supported to incorporate trees, which should be at an appropriate scale, be indigenous species and of local provenance. The inclusion of fresh tree planting will be considered in relation to the impact it will have on the surrounding character and landscape. This guidance is in addition to the operation of an existing Tree Sponsorship Scheme.”*

#### **Supporting text review – commentary/recommendations**

Given the remit of this review is to focus on climate change and given the findings of the GBI Strategy, as well as making reference to the role of trees as carbon sinks, it would be beneficial to mention the role they can play in natural flood management.

An up-to-date figure for tree coverage in the District does not currently exist (previous one from Woodland Trust March 2010), and so this is something that the GBI Strategy or another document which follows on from this (for example a District-wide Tree Strategy) will look to explore.

It would be good to make reference to the Council's 1 Million Trees ambition in paragraph 11.38 or 11.39 and also mention that the Council is looking to put together a Tree Strategy for the District.

In paragraph 11.39 it would be useful to highlight the importance of having the right trees in the right places, to ensure they don't have knock on negative impacts upon other aspects of the environment such as butterfly species. Also, to highlight the multiple benefits trees can provide and the contributions they make rather than just referring to landscape character.

Note: Proposed new NPPF wording in paragraph 130 (entire paragraph is new): *"Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined<sup>49</sup>, that opportunities are taken to incorporate trees elsewhere in developments (such as community orchards), that appropriate measures are in place to secure the longterm maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with local highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users."*

The interactive GBI map will help to locate opportunity areas for tree planting and thus will become a tool that can be used to implement this policy.

## **POLICY DM27: OPEN SPACE, SPORTS AND RECREATIONAL FACILITIES**

### **The current policy**

#### *“Protection of Open Space, Sports and Recreational Facilities*

*The Local Plan Policies Map identifies a range of designated open spaces, sports and recreational facilities within the district which have been provided for their important value. Proposals that seek to protect and enhance existing designated open spaces, sports and recreational facilities shall be supported by the Council. The Council will not permit the loss of designated open space, sports and recreational facilities unless:*

- I. An assessment has been undertaken to demonstrate that it is surplus to requirements;*
- II. An assessment has been undertaken to demonstrate that it no longer has an economic, environmental or community value, which shall include consultation with key stakeholders and the local community;*
- III. The loss resulting from development would be replaced by equivalent or better, high quality provision in a suitable location;*
- IV. The development is for alternative open space, sports and recreation provision, the benefits of which clear outweigh the loss.*

*Development proposals that are adjacent to designated open spaces, sports and recreational facilities will be required to incorporate design measures that ensure that there are no negative impacts on amenity, landscape value, ecological value and functionality of the space. The Council will only permit development that has identified negative impacts on open space, sports and recreational facilities where appropriate mitigation measures or compensation measures have been provided.*

*The Council will protect amenity spaces, particularly in the main urban settlements of Lancaster, Morecambe, Heysham and Carnforth that are not specifically designated as open space but have an economic, environmental or social value to the community they serve. Development of such sites will not be encouraged unless appropriate re-provision is provided or it is clearly demonstrated to the satisfaction of the Council that the land in question does not provide any economic, environmental or social value.*

#### *The Creation of New Open Space, Sports and Recreational Facilities*

*Development proposals located in areas of recognised open space, sports and recreational facility deficiency will be required to provide appropriate contributions toward open space, sports and recreational facility provision, either through provision on-site or a financial contribution toward the creation of new or the enhancement of existing open spaces, sports and recreational facilities off-site. Development proposals should give due consideration to the standards and thresholds set out in Appendix D of this DPD in relation to open space requirements or, where appropriate, site specific policies contained within the Strategic Policies & Land Allocations DPD.*

*Any provision made for open space, sports or recreational facilities should be fully accessible to the public without any restrictions, and will be provided in addition to any private amenity space or landscaping. Proposals should not have an adverse impact on surrounding residential amenity in terms of light and noise disturbance, with any potential impacts being appropriately mitigated against. The management and maintenance of open space, sports or recreational facilities should address the requirements of Appendix D of this DPD.”*

### **Policy review – commentary/recommendations**

It is acknowledged that the intention of this policy is to specifically relate to recreational open space, sports and recreational facilities.

The policy already acknowledges that open spaces can have economic, environmental and social value. However, as demonstrated through the GBI Strategy, such spaces can also have climate change adaptation and mitigation value. It is important to acknowledge that such spaces do provide benefits to mitigating/adapting to the impacts of climate change (in supporting text could acknowledge that sometimes open spaces can intentionally or sometimes unintentionally provide a space for SuDS. Proposed new NNPF wording in paragraph 97 says *“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 efforts to address climate change”*”.

In relation to creation of new open space, reference could be made to the need to consider the multi-functionality of such spaces as part of the design process. As the GBI Strategy has demonstrated, open spaces aren't necessarily just used for recreation, they can also provide landscape and ecological benefits, and in some cases provide setting for historic assets if this were to be carefully considered as part of the design. Up to now the focus has been on thresholds for onsite/offsite provision and making sure the space is delivered or contributions are made to deliver enhancement on another existing site. This is pushing it one step further, and so once that is achieved, consideration should be given to how else the space may be used. i.e. not just a small area of grass with trees planted in the middle of it – there is a need to think about how this space could be used 5,10,15 years down the line. Trees planted in the middle of the space means people won't really be able to use it, and if it's a pocket space will it become a habitat for species? This policy should set out the importance of layout and considering how the positioning of open space may fit in with/connect to nearby green and blue spaces and how that then fits in with the wider GBI network.

During the GBI Strategy workshops concerns were raised about the management of such open spaces and this is reflected in the Strategy itself, and whilst this is already referred to in the policy, it should be clearly stated that details should be set out in a Management Plan, to ensure the intended uses and benefits are delivered and secured in perpetuity.

Appendix D needs to be updated to reflect KKP evidence.

### **The current supporting text**

Paragraphs 7.21 to 7.29 currently state that:

*“7.21 The provision of open spaces, sports and recreational facilities, for the benefit of local amenity and as a source of recreation and activity, is vitally important to aid the well-being of local residents and create a positive sense of place.*

*7.22 The Council have prepared and published a new Open Space Assessment for the district (prepared by KKP consultants and published in 2018) and a Playing Pitch and Outdoor Sports Strategy (also published by KKP consultants and published in 2018). These provide an up-to-date position on open space and recreational matters which will be relevant in the determination of future planning applications.*

*7.23 At this point in time it remains the position that a deficiency applies across most of the urban areas of the district. Therefore the Council’s approach will be to resist development that would result in the loss of open space, sports and recreational facility provision, in particular spaces that have an environmental or community value. The Council believe this to be a vital piece of evidence in understanding the current demands and future needs for a range of open space types. The Council expects development proposals to seek to address deficiencies in open spaces where necessary and appropriate to do so, making use of the most up-to-date Council evidence on public open space and playing pitch provision.*

*7.24 Not all open space is important for recreational, environmental and community uses, nor does it necessarily contribute to the visual amenity of the locality. Existing open spaces may also offer the opportunity to contribute to necessary development, improvements to the urban environment or enhancements to existing open spaces. Therefore, where exceptional circumstances are demonstrated, consideration will be given to proposals that involve the loss of identified open spaces. However, in determining whether open space should be released for development, community involvement will be central to the decision making process. This must be undertaken by the developer / applicant in advance of the submission of the planning application.*

*7.25 The Council will seek to retain all open space, sports and recreational facilities where they are concluded to have a value, either to the local community that they serve or for other environmental values. Community ownership of open spaces, sports and recreational facilities will be encouraged by the Council. The management and improvement of such assets should be championed through the local communities in which they serve and are of value to. The Council will seek to work in partnership with the local community to assist with the ongoing maintenance of open space, sports and recreational facilities.*

*7.26 Proposals will be expected to have due regard to the inclusion of open spaces, sports and recreational facilities within the development that is appropriate in scale and nature to what is being proposed. Proposals should be considered against the requirements for on-site provisions and off-site*

*financial contributions that are set out in Appendix D of this DPD. The requirements set out in Appendix D are based on national standards and will be used as a basis for negotiations between the local planning authority and applicants. Consideration should also be given to the content of the Council's Planning Advisory Note (PAN) on this matter, or successor documents.*

*7.27 In considering the issue of viability, development proposals should consider whether it is appropriate to provide either on-site provision or financial contributions to the enhancements and improvements of existing nearby facilities. This is set out in more detail via the Council's Planning Advisory Note on this matter. Dialogue is recommended between applicants and the Council to inform the understanding over open space requirements in the local area. Issues of viability will be given due consideration within the negotiation process.*

*7.28 Whilst commercial development is unlikely to give rise to the need for open space provision, landscaping will form a key element of any proposal.*

*7.29 Development that forms part of a strategic land allocation, as identified in the Strategic Policies & Land Allocations DPD should take direction from the specific policies relating to the site (and Masterplan / Development Brief where applicable) in relation to open space, sports and recreational facility requirements."*

#### **Supporting text review – commentary/recommendations**

Paragraph 7.21 could reference the other uses open space can provide, whilst primary use is recreation, can provide other benefits too that should be considered when designing a development as set out above in policy commentary.

Based upon KKP evidence there are still deficiencies as this evidence base identified deficiencies. To an extent until we were to update this evidence base again, we wouldn't know the full extent of the deficiencies, as whilst we can map the locations of open spaces to be able to assess the quantity and accessibility, would need to survey the sites to assess their quality/value.

As set out in the policy commentary above, it should perhaps be highlighted that careful consideration should be given to the design of open space within regards to its location and layout within the development proposals, consider how it may best fit in with the wide network and nearby GBI assets.

Issue of management already discussed and the importance of having community support and backing behind a new open space to really make it the best it can be for both the local community and nature.

Update Appendix D

The interactive GBI map will help to spatially locate opportunity areas that are deficient in open space and thus will become a tool that can be used to implement this policy.

## **POLICY SP8: PROTECTING THE NATURAL ENVIRONMENT**

### **The current policy**

*“Lancaster district contains important landscapes, species and habitats that are valued features of the natural environment.*

*The Council recognises the importance of biodiversity and geodiversity, and has prepared a Local Plan that will seek to protect sites of recognised importance; it will also seek to protect areas of land that are functionally linked to areas which are of International and / or National importance.*

*Lancaster district is not immune to the effects of Climate Change, in particular the associated risks from extreme weather events and increasing levels of rainfall. The Local Plan has been prepared in consultation with the Environment Agency, Lancashire County Council (the Lead Local Flood Authority for Lancaster district) and United Utilities to ensure that flood risk issues are clearly considered and flood resilience is addressed. The impacts of future growth will not create new flooding issues or exacerbate existing problems and seeks to reduce flood risk overall.*

*The Council will continue to work with all relevant partners to address issues of flood risk, whether from river, sea or other sources, to implement schemes that will reduce overall flood risk or better manage the continuing effects of Climate Change. Development proposals in areas of known flood risk will be expected to consider their direct and in-direct impacts on flooding and include appropriate mitigation measures to ensure water is managed correctly.*

*Development proposals will be expected to protect, maintain and enhance the district’s biodiversity and geodiversity through the appropriate location of uses, sympathetic design, sustainable construction techniques and appropriate mitigation measures. The Council will also support opportunities to maximise energy efficiency.”*

### **Policy review – commentary/recommendations**

Now that a district wide GBI Strategy exists as part of the evidence base, this strategic policy would benefit from reference being made to the District wide GBI network, and the importance of protecting, maintaining, enhancing and extending the spaces, corridors and chains within the network, and how a more resilient GBI network is needed in the face of climate change, and the other benefits (as set out in the GBI Strategy) that this can bring.

### **The current supporting text**

Paragraphs 10.5 to 10.10 state that:

*“10.5 Lancaster district has a unique range of environmental designations, from International importance (such as Morecambe Bay) down to sites that have local value – such as Biological Heritage Sites. The Lancaster District is also home to two Areas of Outstanding Natural Beauty (AONB’s); Arnside and*

*Silverdale and the Forest of Bowland.*

*10.6 The Local Plan has the responsibility to ensure that important landscapes, species and habitats are protected from development that would be harmful and inappropriate. A range of international, national and locally designated sites have been identified within the plan that are protected from future development. Taken together, the Local Plan identifies types of historic, landscape and natural features of value, considering each through detailed and specific policies in order to explain their significance and the reasons to protect and conserve them.*

*10.7 In identifying future growth areas, in particular the release of strategic greenfield sites, the Council have been mindful of the balance that is needed between the competing needs of protecting the environment against the need to deliver sufficient growth to meet the district's housing and economic needs.*

*10.8 In order to achieve this a range of ecological and landscape work has been undertaken, along with Sustainability Appraisal and Habitats Regulation Assessment<sup>2</sup>. Together these provide a clear understanding of the potential environment effects of new development. These have been critical in influencing both the allocation of land and, most importantly, the detail of the policy contained within the plan.*

*10.9 Climate change remains a key issue for the Local Plan to address. This can be achieved through supporting schemes that seek to promote more sustainable forms of transport, sustainable construction methods, the delivery of low carbon and renewable energy, increases and enhancements to green infrastructure, and ensuring that development is adequately protected from flood risk.*

*10.10 The district has suffered from extreme weather events and flooding – December 2015 saw significant flooding occur along the River Lune especially to property in Lancaster and Halton and further events in the South Lancaster, Galgate and Halton occurred in November 2017. The Local Plan has been prepared with these risks in mind, with allocations made on land that is not vulnerable to future flooding and with an expectation that development should be designed in such a way as to not create new flooding issues in future or exacerbate current problems.”*

#### **Supporting text review – commentary/recommendations**

The supporting text should set out what the GBI Strategy is and what it seeks to achieve and how this relates to the specific climate change focus of the Local Plan Review.

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<sup>2</sup> <http://www.lancaster.gov.uk/planning/planning-policy/about-the-local-plan>