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Matter 7: Green and Blue Infrastructure

Issue: Are the policies on green and blue infrastructure justified, effective and consistent with national policy?

7.1 Is Policy SC4 justified and effective? Would Policy SC4 prevent renewable energy projects from occurring within green and blue infrastructure areas?

Lancaster City Council Response

Yes. The review of policy SC4 is underpinned by the council's Green and Blue Infrastructure (GBI) Strategy [P_29] that was produced to guide and inform the CELPR, the need for which was highlighted when the Scoping consultation responses emphasised the valuable role our green *and blue* spaces can play in mitigating and adapting to the impacts of climate change.

The principle of policy SC4 was established through the adopted Strategic Policies and Land Allocations DPD, however, the GBI Strategy highlighted that the focus should not purely be on green infrastructure, but also blue, and how there are many corridors and chains which help to make up the wider (District-wide) green and blue infrastructure network. Therefore, the wording of the original policy was no longer considered appropriate in accordance with the updated evidence base. Additionally, the GBI Strategy highlighted the importance of not only connectivity, but also improving and enhancing the multifunctionality of GBI, which this policy seeks to emphasise and thus encourage new developments to contribute towards.

Similar to the approach taken with the original adopted policy, it was not considered appropriate to identify the entire GBI network via this policy. Paragraph 175 of the Framework states that 'Plans should...*take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure*'. This policy therefore seeks to identify the key, strategic green and blue corridors which meet the criteria set out in paragraph 23.17. Again, this criteria-based approach was used in the original adopted policy and has only been tweaked in accordance with the revised evidence base. Whilst the purpose of this policy is to provide a spatial indication and recognition of the key strategic green and blue corridors and chains within the District, the policy does also recognise the role of linkages between these and the contributions that other assets make towards them (for

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example, it is individual tributaries which make up the main river corridor), and this is clearly acknowledged within the policy.

Alternative approaches for this policy were considered, as set out in evidence document: Topic Paper 2 Green Blue Infrastructure Consideration of Alternative Policy Approaches & SA/HRA [TP_02], where other policy options could have been to: do nothing, to just make minor changes to names of assets or to keep the current identified list of 'Greenspace Networks'. However, doing this would ignore the findings of the GBI Strategy, which identified a District wide network made up of corridors and chains, and blue and not just green spaces. Policy SC4 is therefore considered to be Justified and Effective.

The policy is clear that the identified green and blue corridors and chains should be protected from development which would cause inappropriate harm and damage to their value and integrity, and opportunities should be sought to improve and enhance the multifunctionality and connectivity within these corridors and chains, and so this applies to all development, including renewable energy projects. This therefore does not mean that policy SC4 prevents renewable energy projects from occurring within green and blue infrastructure areas. As set out within policy DM53, renewable energy proposals will be required to ensure they are in accordance with the key considerations listed within the policy to ensure the direct, indirect, individual, and cumulative impacts will be made acceptable, and this includes upon the natural environment.

7.2 Is the coverage of green and blue infrastructure on the Policies Map and within Figure 23.2 of the Part 1 Plan appropriate?

Lancaster City Council Response

Yes. The GBI Strategy highlighted the wide variety of types and uses of green and blue infrastructure (GBI), hence a thematic approach was used to structure the Strategy. As set out within the supporting text of policy SC4 (paragraph 23.17), the purpose of this policy is to provide a spatial indication and recognition of the key strategic green and blue corridors and chains within the District, which are part of the wider network which spans the District. Following on from the principles laid out in the original adopted policy, specific criteria has been used and amended since the original adopted policy in light of the latest evidence base, to identify

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which specific corridors and chains should be identified through policy SC4, and subsequently shown on the Policies Map [**P_01.1.1, P_01.1.2 and P_01.1.3**] and within Figure 23.2 of the Part One Strategic Policies and Land Allocations DPD [**SD_01.1**].

Whilst a comment was received in relation to the Arnside and Silverdale AONB not being included, as the policy supporting text acknowledges, the list of green and blue corridors and chains identified in policy SC4 is not exhaustive because it is recognised that there are numerous others across the District, but these have been specifically identified as they meet the specified criteria for identifying *key strategic* green and blue corridors and chains within the District. The criteria used to identify these specific corridors and chains, set out within the supporting text of policy SC4, has been consulted upon at Regulation 18 and 19 as shown in [**P_01.1 and PP001**] and no comments on the proposed new criteria were received at either of these consultation stages. Therefore, the coverage of green and blue infrastructure on the Policies Map and within Figure 23.2 is considered appropriate.

It is recognised that the GBI network is not static. Not least due to the ever-changing impacts of climate change. For example, additional areas may become susceptible to flooding and fall within flood risk areas as time moves on. It was therefore decided that the interactive GBI map [**P_29.1**] which accompanies the GBI Strategy will be a 'live' tool, and thus not a static map, so that when new spatial data becomes available it can be plotted onto the interactive map to be used by those preparing planning applications and those determining them as a useful, up-to-date tool to aid their understanding of the existing GBI network. Such an approach would not be appropriate for the Policies Map. As demonstrated within the GBI Interactive Map, there are a vast array of assets and datasets which make the entire GBI network, and this was another reason why it was not considered appropriate to map all of these on the Policies Map. However, it is acknowledged that some GBI assets are already designated on the Policies Map as they are specifically identified through other GBI related policies, such as SC3 (Open Space, Recreation and Leisure) and EN7 (Environmentally Important Areas), but such an approach is not appropriate for all features of GBI, such as flood risk and tree coverage.

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7.3 Is it clear what the existing green and blue infrastructure network is?

Lancaster City Council Response

Yes, the interactive map [P_29.1] which accompanies the GBI Strategy clearly spatially displays the existing GBI network across the District. The data is mapped under each of the six key themes, so that the map is easier to use and understand, with the ability to view each of the datasets (which make up the GBI network) individually in turn. Policy SC4 then identifies the key, strategic green and blue corridors and chains, which are part of and help make up the wider GBI network displayed on the interactive map.

As mentioned in response to question 7.2, the interactive GBI map will be a 'live' map, kept up to date so that it remains a useful tool for applicants when designing, and decision-making when determining, new development proposals.

7.4 Policy SC5 refers to opportunity areas to be in accordance with Policy DM43. Are the two policies consistent?

Lancaster City Council Response

Yes, policies SC5 and policy DM43 are consistent with one another. The focus of the original wording of policy SC5 was upon recreation and the identification of opportunity areas for significant new or improved open space in areas of deficiency. This need is still recognised, however the GBI Strategy emphasised the importance of creating spaces that are multifunctional, and recreation was identified as just one of the key uses/types of GBI within the Strategy, and so the revisions to the wording of policy SC5 ensures that these opportunity areas are brought forward in accordance with the revised evidence base, and thus are consistent with the requirements of policy DM43.

7.5 Is Policy SP8 justified and consistent with national policy?

Lancaster City Council Response

Yes, policy SP8 is a strategic policy which sets out the council's overall strategy to protect the natural environment, recognising the importance and value of these features and how the plan seeks to recognise and protect them, which is in

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accordance with paragraph 17 of the Framework. Continuing in paragraph 20: *'Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation'*. As required by paragraph 21 of the Framework, this policy does not extend to detailed matters as these are more appropriately dealt with through other non-strategic policies, but the policy does highlight the key local issues which need to be addressed, such as the protection of areas that are functionally linked to areas which are of International and/or National importance and the climate change associated risks from extreme weather events, such as flooding which is a particular issue for the District.

The main change within this policy has been to include reference to the District's green and blue infrastructure network (GBI), recognising the valuable role this can play in how the District, through new development, can address the impacts of climate change, as highlighted within the council's GBI Strategy. The Framework is clear at Paragraph 175 that plans should *'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'*.

Since the Local Plan was adopted, the Environment Act is now in place which sets new legal targets and requirements to deliver nature recovery. It was therefore considered important to recognise and show the council's support within the revised wording of policy SP8, particularly in relation to those areas which affect how we plan for nature.

As set out within Topic Paper 2 Green Blue Infrastructure Consideration of Alternative Policy Approaches & SA/HRA [TP_02], alternative policy approaches were considered such as to do nothing, which would mean no inclusion of reference to the District-wide GBI network and its role in mitigating and adapting to climate change which is the focus of the review. To not include this would be to ignore a key piece of evidence. Policy SP8 is therefore considered to be Justified and Consistent with National Policy.

7.6 Should reference be made in Policy SP8 to the Environment Act 2021?

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Lancaster City Council Response

The council agree that the reference to the 'Environment Bill' in policy SP8 should be changed to the 'Environment Act 2021'. The council proposes that this reference be included through a proposed main modification.

7.7 Has sufficient consideration been given in Policy SP8 to site constraints, such as utilities infrastructure?

Lancaster City Council Response

Yes, the natural environment is fundamental in making Lancaster the District it is, home to a unique range of environmental designations, which this policy seeks to highlight. The purpose of policy SP8 is to recognise, at a strategic level, the importance of the District's landscapes, biodiversity and geodiversity, alongside other GBI functions, and ensure that they are protected, maintained and enhanced as new development comes forward. As the policy states, development proposals will be expected to do so *'through the appropriate location of uses, sympathetic design, sustainable construction techniques and appropriate mitigation measures'*. Whilst the purpose of policy SP8 is not to identify site constraints nor to set out any specific requirements, in accordance with paragraph 17 of the Framework it does set out at a strategic level council priorities and the importance of protecting the District's natural environment (particularly in the face of climate change), and that consideration has been given to potential site constraints. This includes constraints such as utilities infrastructure, as the final paragraph of policy SP8 states that *'the Council will continue to work with all relevant partners, stakeholders and communities 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'*. This sets out the council's commitment to engage with stakeholders in relation to water management, this will provide the opportunity to discuss the implications of the GBI network with the relevant utilities providers.

Importantly the plan should also be read as a whole. The Local Plan identifies an array of historic, landscape and natural features of value, each of which are considered and addressed through more detailed and specific policies throughout

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the rest of the Local Plan, to explain their significance and the reasons to protect and conserve them. There are also policies in place which set out how potential site constraints should be addressed, such as the relationships with water related infrastructure. For example, policy DM36 specifically relates to protecting water resources, water quality and infrastructure.

7.8 With reference to new criterion III of Policy DM27, will it be clear to developers what form an assessment of the environmental, climate mitigation and climate adaptation value of an open space will take?

Lancaster City Council Response

Given the specific climate change focus of the Local Plan Review, the GBI Strategy sought to highlight the climate mitigation and adaptation benefits that GBI can provide, and so this includes open spaces. Therefore, in addition to assessing the economic, environmental and community value of an open space, it was also considered pertinent to ensure, more specifically from an environmental perspective, that the climate mitigation and adaptation value of an open space is also assessed.

To aid developers in doing this, the GBI Strategy was accompanied by a GBI Toolkit [P_29.3], which acts as a framework to help developers consider how incorporating GBI within their development proposals can contribute towards widening the multi-functional benefits GBI assets can provide, including climate mitigation and adaptation. The GBI Toolkit has been incorporated into the 'Incorporating Green and Blue Infrastructure into the design of development' SPD which is currently out for consultation.

7.9 What is the evidential basis for the change in dwelling thresholds for on and off-site provision of open space and financial contributions in Appendix D of the Part 2 Plan?

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The changes to Appendix D of Part Two of the Local Plan have been made to reflect the most up-to-date evidence base in relation to open space, playing pitches and outdoor sports. These updated standards and thresholds are set out within the adopted 'Open Space Provision in New Residential Development' Planning Advisory Note (PAN) which provides informal guidance on this issue. Whilst the evidence was prepared in 2018/19 it came too late to influence the currently adopted Local Plan, which went through Public Examination in April / May 2019. Consequently, to ensure Appendix D is in accordance with our most up-to-date evidence base, its content has now been revised through this review. This was considered imperative and within the scope of the Local Plan Review given the widely recognised important role of green spaces in how we address climate change, which was particularly highlighted through the initial scoping consultation and the subsequent GBI Strategy. The council therefore did not feel it could pursue a CELPR without incorporating our most up-to-date evidence base. These revised standards and thresholds have also been set out within the emerging 'Incorporating Green and Blue Infrastructure into the design of development' SPD, which will replace the existing aforementioned PAN.

7.10 Is it necessary to cross-reference between Policies DM27 and DM43?

Lancaster City Council Response

Yes. Policy DM43 covers all aspects of green and blue infrastructure, which includes open spaces, sports and recreational facilities. However, policy DM27 goes into more detail about the protection of these specific spaces, for example how a development proposal should be assessed if the scheme proposes the loss of designated open space, sports and recreational facilities, and also sets out the specific policy direction and guidance in terms of their creation as part of a new development. Given there are specific standards in place regarding open space and sports provision, it was considered necessary through the preparation of the adopted Local Plan to highlight that these exist, and we have maintained the same view as part of the CELPR.

With regards to referencing policy DM43 within policy DM27, given the findings of the GBI Strategy emphasised the multifunctional benefits of GBI, which predominantly comes down to the design of GBI, it was considered pertinent to

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highlight within policy DM27 how the creation of new open spaces can be delivered in such a way as to provide wider value beyond purely recreation, as set out within policy DM43. This cross-reference helps to further highlight the role that open space, sports and recreation provision can play in climate change adaptation and mitigation, which is the purpose of the Local Plan review.

7.11 Is Policy DM43 effective and consistent with national policy?

Lancaster City Council Response

Yes, paragraph 154 of the Framework highlights how, through the planning of green infrastructure, new developments can avoid increased vulnerability to the range of impacts arising from climate change, which is fundamentally the purpose of this review. Revisions to the wording of policy DM43 therefore seek to strengthen the role GBI can play in how we mitigate and adapt to the impacts of climate change within the Lancaster District.

The direction of this policy is considered to align very closely with the Framework's definition of green infrastructure, which incorporates blue spaces, acknowledges the importance of a network which can span across urban and rural contexts, and is made up of spaces which are multi-functional, delivering environmental, economic, health and wellbeing benefits. Paragraph 92 of the Framework further emphasises the role green (and blue) infrastructure can play in enabling and supporting healthy lifestyles, especially where this would address identified local health and well-being needs and wider socio-economic impacts which have been highlighted within the GBI Strategy, the findings of which have informed the review of the wording in policy DM43.

As previously mentioned, the revised approach towards green and blue infrastructure set out within policy DM43 is fundamentally underpinned by the GBI Strategy, which has been subject to extensive consultation and stakeholder engagement. Not only through written representations at Regulation 18 and Publication stage (Regulation 19), but a series of stakeholder workshops were held prior to producing the draft Strategy, providing the opportunity for key issues, concerns and aspirations for GBI within the Lancaster District to be voiced, which directly influenced the 'key issues', 'objectives' and 'emerging opportunities' for each theme within the Strategy. In total 30 groups/organisations attended the

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stakeholder workshops, and to heighten the profile of the GBI Strategy, whilst being one part of a raft of evidence underpinning the CELPR, it was subject to its own consultation which ran alongside the draft Regulation 18 consultation on the CELPR, to ensure it caught the attention of all those interested in influencing and shaping the way in which Lancaster approaches GBI on a District-wide scale. Policy DM43 is therefore considered to be effective and consistent with national policy.

7.12 Will all development proposals be expected to integrate green and blue infrastructure and forge linkages with the wider network?

Lancaster City Council Response

Yes, policy DM43 states that 'development proposals must seek to integrate green and blue spaces, corridors and chains and forge linkages with the existing wider green and blue infrastructure network'. Therefore, all development proposals will be expected to integrate green and blue infrastructure and forge linkages with the wider network. The phrase 'must seek to' reflects that this is an expectation, whereas if it was a specific requirement the policy would simply say 'must'. It is accepted that there may be instances where this is not practicable, but it is not considered appropriate to add 'where possible' into the policy as it is considered that this would weaken the expectation. Historically this may have been considered the case for advertisement applications, but where for example an advertisement is incorporated on the side of a bus shelter, there is the opportunity to integrate a green roof. The revised wording of policy DM43 therefore places a greater expectation on all development proposals to do what they can to integrate GBI into their scheme.

7.13 Does Policy DM43 provide sufficient certainty that green and blue infrastructure will be provided and retained?

Lancaster City Council Response

As set out in response to question 7.12 the expectation placed upon development to integrate GBI and forge linkages with the existing wider network so as to prevent the fragmentation and cause isolation of these valuable assets has been heightened through the policy review. The policy purposefully places greater emphasis upon the protection of the District's green and blue spaces, corridors and chains which is key to their retention. The policy has also been strengthened

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so that it says 'individual green and blue spaces *must* be retained' rather than 'should be retained'. The policy is clear that where there may be a loss of designated green or blue space due to exceptional circumstances, this will only be considered acceptable where appropriate mitigation measures are provided.

Importantly DM43 is underpinned by the GBI Strategy which is accompanied by an interactive map [P_29.1] which has identified the known existing GBI network to support its retention and helps to spatially identify ways in which GBI can be provided within a new development, and this is further supported by more detailed guidance within the emerging 'Incorporating Green and Blue Infrastructure into the design of development' SPD. So, the tools and guidance available to applicants setting out how GBI can be provided as part of a development proposal is greater than ever before. Furthermore, the GBI Strategy highlights the wider benefits and versatility that multifunctional GBI spaces, corridors and chains can provide which strengthens the justification for, and value of, their retention and inclusion within new development proposals. Hence the requirement within policy DM43 for the design of development proposals to consider the wider values of GBI in relation to the six key themes/uses. As stated within the paragraph 130 of the Framework, '*Planning policies and decisions should ensure that developments optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space)...*'.

Crucially, policy DM43 now requires a Green and Blue Infrastructure Management and Maintenance Plan to be submitted to set out how green and blue infrastructure assets within a new development will be managed, maintained and secured to ensure these assets and their long-term benefits are actually provided.

7.14 Does Policy DM43 exclude any possible value that green and blue infrastructure networks can have?

Lancaster City Council Response

The key piece of evidence which informed the review of policy DM43 was the District-wide GBI Strategy [P_29], and due to the vast array of types and uses of GBI, six key overarching themes/uses of GBI were established, within the context of the Lancaster District, to structure a coherent GBI Strategy. At numerous stages throughout the process of preparing the Strategy, all consultees

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were provided the opportunity to comment on whether the six key themes encapsulated the main uses of GBI and these were not disputed. It is widely recognised that each of the themes are broad and thus interconnected and do not exist in isolation, and so they effectively act as broad guiding principles. 'Recreational' value can for example incorporate health and wellbeing benefits, as can 'Active travel'. It is also recognised that climate change is an over-arching cross-cutting theme which runs through all of them. So, to emphasise the Strategy findings that GBI assets can provide multiple functions and values, the six main uses and subsequent values that were identified in the Strategy are set out in the policy, to ensure that equal consideration is given to each through the design of development proposals. However, it is recognised that this is not an exhaustive list of uses/values that GBI can provide. The purpose of this list is to act as a starting point. The council will welcome proposals which seek to explore beyond the values set out within policy DM43. In formulating the policy it was considered important to provide a clear steer as to exactly what values the council requires each proposal to explore, but it was not intended to be a restrictive, definitive list.

7.15 Is Policy DM45 positively prepared, justified, and consistent with national policy?

Lancaster City Council Response

Yes, the policy has been prepared in collaboration with the council's Arboricultural Officer and the council have also worked in close liaison with colleagues at Lancashire County Council (LancsCC), who are the local Highways Authority. We engaged with LancsCC at key stages during the preparation of the GBI Strategy (including attendance at the stakeholder workshops), to ensure they were fully aware of the council's intentions for the Strategy, and thus had multiple opportunities to shape the Strategy and subsequently, the wording of policy DM45.

The important contribution that trees make not only to the character and quality of urban environments, but in how we mitigate and adapt to the impact of climate change is recognised within the Framework and through the GBI Strategy. The Framework is clear at paragraph 131 that new streets should be tree-lined, that opportunities should be taken to incorporate trees elsewhere in developments,

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that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.

Within the Topic Paper which considered alternative policy approaches for GBI [TP_02] the option of 'do nothing' was considered, but it was deemed that this would not highlight the important climate change adaptation/mitigation value that trees can provide, and our District's existing tree stock are valuable carbon sinks, more so than new trees so it is important that they are protected for this reason. The revised policy wording of DM45 therefore now emphasises that there is a presumption in favour of the retention of existing trees, setting out the positive contributions that individual trees, groups, woodland and hedgerows can make and thus why they should be conserved and enhanced. A particular threat to the retention of existing trees that has been identified within the Lancaster District has been the interaction between new development and existing trees as they develop. Consequently, policy DM45 now requires buildings and other structures to be sited to allow adequate space for a tree's natural development, giving due consideration to the predicted height and canopy spread of a tree. The need for which arose from monitoring applications and notices for work for trees over a 2 year period from September 2019 and September 2021 which revealed that 15% of all tree proposals (an average of 40 per year) related to work to trees (removal or reduction) in completed development sites where the trees had existed before the development. (These figures are set out in the supporting text for policy DM45 within 'new paragraph 60' on page 126).

With regards to new trees, the position in policy DM45 has changed from 'encouraging' to 'providing', highlighting the importance of planting the right tree in the right place, and the incorporation of street trees, in accordance with the Framework. Also, to ensure their long-term maintenance, which was a key issue raised within the GBI Strategy, details must be provided within the Green and Blue Infrastructure Management and Maintenance Plan, and the specific information that would be required as a minimum set out within the justification text of this policy ('new paragraph 62').

Policy DM45 had therefore been Positively Prepared, is Justified, and is consistent with National Policy.