

# Green Infrastructure Compendium

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

ECC GI Team April 2025

## Green Infrastructure Compendium

#### Table of Contents

1.	How to use guide	5
	GI Recommendation Comments Compilation for Development nagement (Planning applications and associated planning	
doc	uments)	6
2.1	Access & Public Rights of Way	6
2.2	Active Travel & Green Infrastructure	6
2.3	Ancient Woodland	6
2.4	Biodiversity Credits (To be updated when more info is available)	6
2.5	Biodiversity Net-Gain	6
2.	5.1 Commercial Sites general text	7
2.	5.2 (Major and large sites over 0.5 ha or 5,000sqm+, 10+ dwellings)	7
2.	5.3 For small scale sites	7
2.	5.4 Where the baseline biodiversity value is zero, e.g. in urban areas or small si	es.8
2.6	Biodiversity Net Gain offsite	9
2.7	Biodiversity Net Gain exemptions	
2.8	Building with Nature	9
2.9	Climate Change Resilience Planting	9
2.10	Country Park	10
2.11	Culture, Heritage, and Community Spirit	10
2.12	2 EIA Scoping Opinion	10
2.13	B Essex Climate Focus Area (NB text currently being reviewed)	.10
2.	13.1 General text for all planning applications	. 10
2.	13.1.1 Recommendation/expectation text for Mineral sites	. 11
2.	13.1.2 Recommendation/expectation text for Large Scale Strategic sites/ for other Planning applications (I.e. East and West Chelmsford)	-
2.14	1 Essex Forest Initiative	.12
2.15	5 Essex Water Strategy	.12
2.16	S Existing Landscape Assets	.12
2.17	Grassland Alternatives [from Monoculture/Single seed Grass and Artificial Grass]	.13
2.18	3 Green and Blue Infrastructure	.13
2 40	Croon Infractructure	11

Z.ZU	Green Infrastructure Audit	14
2.21	Green Infrastructure Strategy	14
2.22	Green Roofs	15
3.2	4.1 Bio Solar	15
2.23	Health/ Hospitals/ Care Homes GI Provision	15
2.24	Landscape Strategy	15
2.25	Lawton Principle	16
2.26	National Landscapes (AONB) Designated Sites	16
2.27	New Tree Planting and their early establishment	17
2.28	Play and Natural Play	17
2.29	Public Right of Way and Nature Routes	17
2.30	RAMS	18
2.31	School Grounds	18
2.32	Solar Farms & Green Infrastructure	18
2.33	Special Roadside Verges	18
2.34	Street Trees	18
2.35	Sustainable Design	19
2.36	Sustainable Drainage Systems & Green Infrastructure	19
2.37	Urban Greening Factor	19
2.3	7.1 Other useful tools	20
3. (	GI Conditions Compilation for Development Management (Plan	ning
appli	cations and associated planning documents)	20
3.1	Biodiversity Gain Plan (Condition) -	
	https://www.gov.uk/guidance/submit-a-biodiversity-gain-plan	20
3.2	BNG: Habitat Management and Maintenance Plan	21
3.3	Construction Environmental Management Plan (condition)	
3.3	.1 Green Infrastructure Plan for projects 250+	22
3.4	Green Infrastructure Strategy	22
3.5	Landscape Ecological Management Plan (Condition)	23
3.5	.1 yearly logs of maintenance (Condition)	24
3.6	Restoration and Decommissioning plan (Condition)	24
4. (	GI Advisory Planning Note/Letter Informative	24
4.1	Advisory Point (note can be added at end of letter of response)	24
4.2	Climate Change (to be added to all informative at end of letter of response)	24

5.26	Natural Flood Management			
5.26	5.3 New strategic green spaces	. 38		
5.26	6.2 Hierarchy approach to site location of development	.38		
5.26	6.1 If multifunctional GI is not referenced	.38		
5.26	Multifunctional Green Infrastructure	38		
5.25	Mainstreaming and Integration of GI	37		
5.24	Local Wildlife Sites	37		
5.23	Landscaping and Open Spaces (Multipurpose Spaces)	37		
5.22	Landscape Led Approach	37		
5.21	Key documents recommend when preparing Local Plan	36		
5.20	5.20 Green Belt and GI			
5.19	5.19 Essex Local Nature Recovery Strategy (ELNRS)33			
	Essex Local Nature Partnership			
	Essex is Green StoryMap			
	Essex GI Strategy (2020)			
	Essex GI Standards (2022)			
	Essex GI Strategy and Standards			
	Essex Climate Action Commission			
5.11	Employment provision			
5.10	Early Engagement			
5.9	Developer Contribution			
5.8	Considerations for preparing the new Plan			
5.7	Connectivity			
5.6	Climate Change			
5.5	Biodiversity Credits (ECC Pilot Project -IRF)			
5.4	Biodiversity Net Gain % debate (advice for SPDS)	26		
5.3	Active Travel Routes and GI	26		
5.2	Accessibility to Green Infrastructure	25		
5.1	General Introduction (taken from Braintree Local Plan Ideas response	e)25		
5. G	GI Comments Compilation for Policy	25		
4.3	Standard GI Informative (to be added at the end of letter of response)			

5.31	Urban Greening	40
5.32	School grounds	40
5.33	Social Equity and Inclusion	41
5.34	Stewardship	41
5.35	Strong GI Policy Wording and Coverage (GI Commitment)	41
5.36	Urban Greening	41
5.37	Walkable Neighbourhoods	42
5.38	Workshop held July 2024 summary of findings	42
6. (	GI Comments Compilation for Policy (Neighbourhood Plans)	43
6.1	General NHP Introduction Comment	43
6.2	Connectivity and Active travel	44
6.3	Protection and Provision of Green features and opens spaces	44
6.4	Urban GI delivery through Sustainable Design	44
6.5	Social Equity and Inclusion/ Early Engagement	44
6.6	Building with Nature	45
6.7	NEW POLICY: Green Infrastructure (Draft Example)	45

## Preface or Purpose

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

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



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

### How to use guide

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

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

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

# 2. GI Recommendation Comments Compilation for Development Management (Planning applications and

associated planning documents)

#### 2.1 Access & Public Rights of Way

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

#### 2.2 Active Travel & Green Infrastructure

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

#### 2.3 Ancient Woodland

In terms of the INSERT application/BOARDING ANCIENT WOODLAND, paragraph 193(c) of the National Planning Policy Framework (NPPF) states that "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists". ECCs GI team expects this ancient woodland to be protected. Developments that infringe upon these locations are expected to be designed to avoid detrimental direct and indirect impacts with the appropriate landscape buffers applied. This includes, risk of water-borne pollution, air pollution, dust deposit, change to local hydrology, increased recreational pressure and informal access points and soil compaction.

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

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

#### 2.5 Biodiversity Net-Gain

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

#### 2.5.1 Commercial Sites general text

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

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

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

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

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

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

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

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

The NPPF 2024 sets out that development should deliver measurable net gains in biodiversity. Paragraph 187(d) states that developments should minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological

networks that are more resilient to current and future pressures. Incorporating features which support priority or threatened species. Due to the site area being less than 5,000sqm it is recommended that the <u>Small Sites Metric</u> – a simplified version of the Statutory Biodiversity Metric is applied to take biodiversity into account.

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

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

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

## 2.5.4.2 <u>For applications that provide no BNG calculations due to site baseline value of zero</u>

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

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

#### 2.5.4.3 Urban Greening Factor

Although Defra is proposing to allow sites that have a baseline biodiversity value of zero or negligible to be exempt from BNG requirement, it is encouraged for these sites, regardless of its size to still incorporate biodiversity enhancement into its design.

For brownfield sites and sites with [low ecological value or a BNG metric calculation with a low baseline]. *Please refer to and use the full comment on Urban Greening Factor 2.41.* 

#### 2.6 Biodiversity Net Gain offsite

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

#### 2.7 Biodiversity Net Gain exemptions

This development is not subject to the statutory Biodiversity Gain Plan condition because it is exempt as a householder application / because the planning application was submitted before the statutory requirement for minor applications / other reasons for exemption.

#### 2.8 Building with Nature

It is recommended that any development proposal explores and applies the Building with Nature standards and achieves an accreditation to highlight what 'good' looks like at each stage of the green infrastructure lifecycle and strengthen the development and demonstrate the development goes beyond the statutory minima, to create places that really deliver for people and wildlife. The Building with Nature Standards has been developed by practitioners and policy makers, academic experts, and end-users, and has been tried and tested in multiple schemes from Cornwall to Scotland and is endorsed by Natural England, who is reviewing the current national green infrastructure standards. For more information, please visit here: <a href="https://www.buildingwithnature.org.uk/about">https://www.buildingwithnature.org.uk/about</a>.

#### 2.9 Climate Change Resilience Planting

ECCs GI team recommends sustainable design is explored in terms of building in climate resilience as part of the planting mix. Such as planting to:

- Provide shading and reduce solar glare,
- Improve building energy efficiency,
- Provide carbon storage and sequestration,
- Improve flood and water management,
- Drought tolerant planting i.e.
  - Xeriscaping: Landscaping with minimal use of water and climate resilient planting.

#### 2.10 Country Park

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

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

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

#### 2.11 Culture, Heritage, and Community Spirit

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

#### 2.12 EIA Scoping Opinion

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

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

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

#### 2.13.1 General text for all planning applications

The aforementioned planning application is situated within the Essex Climate Action Commission's (ECAC) recommended <u>Climate Focus Area</u> (CFA), which is formed of the Blackwater and Colne River catchment areas (please see Figure 1 for further details). The objective of this recommendation is for the CFA to "accelerate [climate] action and provide exemplars, for learning and innovation: adopting Sustainable Land stewardship practices: 100% by 2030 and Natural Green Infrastructure: 30% by 2030"

(ECAC, 2021). Among the objectives of the CFA are to achieve net zero carbon, biodiversity net gain, improve soil health and air quality, reduce flooding and urban heat island effect, and enhance amenity, liveability and wellbeing of Essex communities. It will achieve this by wholesale landscape change in rural areas and urban areas and it will look to developments and especially mineral restoration sites [delete if not mineral site application] to contribute to these targets.

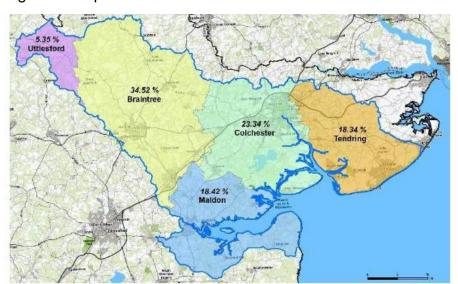


Figure 1: Map of ECACs Climate Focus Area

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

#### 2.13.1.1 Recommendation/expectation text for Mineral sites

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

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

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

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

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

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

#### 2.14 Essex Forest Initiative

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

#### 2.15 Essex Water Strategy

ECC have published a Water Strategy for Essex (2024). Moving forward, this study, the supporting works and findings of this strategy have the potential to influence and support the direction taken in regard to water conservation. To align developments with the Essex Water Strategy, it is essential to implement water-saving technologies like lowflow fixtures and rainwater harvesting. Promote sustainable land use practices, such as green spaces and permeable surfaces, to enhance water retention. Integrate natural green infrastructure, including green roofs and urban forests, to improve water management. Invest in alternative water sources like recycled water and desalination. Collaborate with stakeholders to address water challenges collectively. These steps will contribute sustainable resilient future to а and water https://www.essex.gov.uk/about-council/plans-and-strategies/environment-andplanning/water-strategy-essex

#### 2.16 Existing Landscape Assets

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

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

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

- Grassland: Consideration of species rich grassland within developments can encourage biodiversity by providing habitat, it is low maintenance as it requires less mowing, and also provides a carbon sink. For more information see Grassland | The Wildlife Trusts.
- Wildflower Meadow's: Meadows can look spectacular and attract a variety of pollinators to enhance biodiversity of an area. A mixture of wildflower species is recommended and there are many Native British species to consider. For example, the Primrose (Primula vulgaris). Meadows can also be both small and large scale. For more information see: https://www.rhs.org.uk/lawns/wildflower-meadow-establishment
- Orchards, Food Forests and Allotments: Including an orchard, Food Forest and/or an allotment within a development site can have wide-reaching benefits for the community, for social and mental well-being, provide education, and produce seasonal and local produce. There are also benefits for biodiversity and the climate.
- Lawns: Encouraging residents to keep their lawns longer, especially in the spring can increase the biodiversity within the development. Schemes such as 'no-mow-May' provide an example into the impact 'wild' lawns can have on the biodiversity in a local area.
- Pervious/Permeable driveways and surfaces: It allows rainwater to infiltrate through into underlying layer where it is temporarily stored and fills gaps of exposed turf between plants.
- Wetland and water features: Areas of marsh, fen, peatland, or water—whether
  they are created naturally or artificially, permanent or temporary, with still or
  flowing water that is fresh, brackish, or salt—are referred to as wetlands.
  Constructed wetlands are specially created landscape elements that are
  installed in order to treat contaminated water, lower the risk of flooding, increase
  biodiversity, and provide amenity spaces. They do this by utilising naturally
  occurring physical, ecological, and chemical processes.
- Xeriscaping: Landscaping with minimal use of water and climate resilient planting.

#### 2.18 Green and Blue Infrastructure

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

to deliver new off-site and enhance existing GI could mitigate the impact of increased demand.

#### 2.19 Green Infrastructure

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

- Parks and Gardens
- Natural and semi-natural green spaces
- Designated sites (SPAs, SACs, Ramsars, SSSIs, National Landscapes (AONBs))
- Reservoirs, lakes, and ponds
- Waterways (watercourses)
- Greenways (Public Rights of Way, footpaths, cycleways and tracks, bridleways, towpath)
- Outdoor Sports Facilities (Sports pitches)
- Amenity green space (provision for play facilities etc.)
- Green spaces around premises (Educational premises open space and playgrounds)
- Cemeteries and churchyards
- Allotments, community gardens and city farms
- Public Realm/Civic spaces (urban greening urban and street trees, road verges, green walls, green roofs, Sustainable Drainage Systems and Natural Flood Management)
- Productive Spaces (agricultural land and meadows)
- Green Corridors (verges, green wedges, and green fingers)

#### 2.20 Green Infrastructure Audit

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

#### 2.21 Green Infrastructure Strategy

No works shall take place until a detailed Green Infrastructure Strategy/ Landscape Strategy for the site, based on the Essex Green Infrastructure Strategy and Essex GI Standards and an assessment of the ecological context of the development, has been submitted to and approved in writing by a Landscape specialist at the Local Planning Authority. The scheme should include but not be limited to:

- The development should be designed to deliver Biodiversity Net Gain and wider environmental net gains, that forms an important component of nature recovery networks and the wider landscape scale GI network.
- Demonstrate that the development site/setting has been reviewed for multiple functions and benefits (listed in the Essex GI Strategy (chapter 5.1, page 35) and ensure that green/open spaces are designed to ensure multi- purpose and functional use.

- Travel Infrastructure should give consideration to use of GI features to ensure accessibility across the site.
- Ensure there are good accessible links for all from the development to existing settlements, urban centres, rural areas, active travel networks and green spaces.
- Demonstrate how the GI has been designed to provide recreational facilities for different user and age groups. It should deliver social inclusive processes that are open to all and incorporate the knowledge and needs of diverse parties.
- Tree Planting should be undertaken on site wherever possible.

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

#### 2.22 Green Roofs

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

#### 3.24.1 Bio Solar

It is positive to see the inclusion of solar panels on the roof of the [Insert name of building/site]. [along with areas identified for green roofs. There is the potential to combine the two to extend the green roof areas (depending on roof load) and increase the BNG benefits.] The ECC GI team recommends that the use of Bio Solar is explored. This can have dual benefits for energy and biodiversity. This includes biodiversity habitat creation, water storage capacity, flood alleviation and energy saving potential. Further information can be found here: <a href="https://livingroofs.org/introduction-types-green-roof/biosolar-green-roofs-solar-green-roofs/">https://livingroofs.org/introduction-types-green-roof/biosolar-green-roofs/</a>.

[For further information on integrating nature into developments please refer to <u>Sustainable Design</u> 3.34.]

#### 2.23 Health/ Hospitals/ Care Homes GI Provision

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

#### 2.24 Landscape Strategy

The Landscape Strategy within the Design and Access Statement [or equivalent] is encouraging although it is recommended that further detail is included. We would like

to see greater detail of a landscape strategy translated on to a Landscape/GI Plan. For example,

- The GI plan should include details of advance planting around construction sites, and details of the quality standard of construction and maintenance.
- Detailed planting plans showing the location, species and numbers of proposed new trees, hedging, shrubs and other planting on the site.
- Planting schedules, noting the species planting sizes (at time of planting) and proposed numbers/densities where appropriate.
- Written specifications (including cultivation and other operations associated with plant and grass establishment).
- An implementation programme clearly indicating a timescale for the completion of all landscaping works.

#### 2.25 Lawton Principle

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

#### 2.26 National Landscapes (AONB) Designated Sites

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

#### The following example of advice relates to NSIP developments:

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

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

Essex County Council supports the decision for underground piping across/that crosses between [insert location] and [insert location] of the designated AONB and within the Stour Valley Project area, due to the intrinsic landscape and scenic quality of the area along with its relative wildness and tranquillity. When this is being

undertaken, appropriate measures should be taken however to avoid, minimise, mitigate and compensate negative impacts including to cultural heritage and archaeology. It is recommended that the ANOB Partnership is consulted for their advice on this matter and to review any mitigating measures.

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

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

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

#### 2.27 New Tree Planting and their early establishment

ECC GI Team will expect that all new trees on new developments will have their establishment considered at the time of planting. This should include weeding, mulching and watering. All newly planted trees with a trunk diameter of 6cm or more will be watered for three years via a buried watering tube, irrigation bag or irrigation well; applying 60 litres per visit, at least 14 times between May and September. Mulch, stakes, ties and weed establishment will also be inspected and actioned as required. Stakes and ties should be removed 3 years after planting.

#### 2.28 Play and Natural Play

ECCs GI team supports the consideration of natural play. For this, we would expect play strategies to be formed by the character and function of the green spaces. It should be imaginatively designed using landforms, level changes and water, as well as natural materials such as logs or boulders, which create an attractive setting for play.

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

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

For further details regarding the existing Public Right of Way network, please see
 and/or contact < <a href="mailto:Helen.Baker@essexhighways.org">Helen.Baker@essexhighways.org</a>

#### **2.30 RAMS**

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

#### 2.31 School Grounds

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

#### 2.32 Solar Farms & Green Infrastructure

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

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

#### 2.33 Special Roadside Verges

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

#### 2.34 Street Trees

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

#### 2.35 Sustainable Design

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

- Green Roofs/Walls: The provision of these features allow ecosystems to function and deliver their services by connecting urban, peri-urban and rural areas. Alongside biodiversity habitat creation, green roofs and walls can provide water storage capacity, flood alleviation and energy saving potential. In addition to buildings, these features can be provided on sustainable transport infrastructure (such as on bus stop/ cycle storage facilities).
- Wildlife Bricks: The provision of wildlife bricks creates habitats for invertebrates.
- Dual street furniture/seating (i.e., a bench including a planter): The design of the street furniture and bin stores can contribute to the landscape character, reduce clutter of an area or street and act as a green corridor/link to the wider landscape scale GI network.]
- Log piles/ hibernacula- for invertebrates.
- Bee Sand planters
- Hedgehog highways
- Planting of night scented and pollinator plants to attract bats and invertebrates.
- Soft landscaping to soften the appearance of the parking areas/bays: For example:
  - Biodiverse perimeter planting used to reduce the visual impact of parked cars.
  - Street parking spaces are greened with turf (Austrian gravel lawns), garden ornament planting and furniture which prevents inappropriate parking and avoid the use of bollards and railings.
  - SuDs Rain gardens/ mixed grass verges

#### 2.36 Sustainable Drainage Systems & Green Infrastructure

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

#### 2.37 Urban Greening Factor

Although Defra is proposing to allow sites that have a baseline biodiversity value of zero or negligible to be exempt from BNG requirement, it is encouraged for these sites, regardless of its size to still incorporate biodiversity enhancement into its design. For brownfield sites and sites with low ecological value [or a BNG metric calculation with a low baseline]. The ECC GI team recommends that the Urban Greening Factor is consulted to establish best practice. The Urban Greening Factor (UGF) is a planning tool to improve the provision of Green Infrastructure (GI) particularly in urban areas. It can be used to increase urban greening and contribute to Biodiversity Net Gain. While

it is voluntary, the ECC GI team strongly recommends utilisation of the UGF, and it can significantly contribute to place making, nature recovery, biodiversity enhancement, and connectivity to larger green infrastructure networks within proximity to the development site. More information can be found within the <a href="National Green">National Green</a> Infrastructure Framework Standards (2023).

#### 2.37.1 Other useful tools

- The ECC GI team recommends that the Urban Greening Factor is consulted to establish best practice. The Urban Greening Factor (UGF) is a planning tool to improve the provision of Green Infrastructure (GI) particularly in urban areas. It can be used to increase urban greening and contribute to Biodiversity Net Gain. While it is voluntary, the ECC GI team strongly recommends utilisation of the UGF, and it can significantly contribute to place making, nature recovery, biodiversity enhancement, and connectivity to larger green infrastructure networks within proximity to the development site. More information can be found within the National Green Infrastructure Framework Standards (2023).
- Another useful tool to explore is Natural England's <u>Environmental Benefits</u> <u>from Nature tool</u>. It can be utilised to identify opportunities for enhancing broader benefits from nature while avoiding and minimising negative impacts. It is designed to complement the Biodiversity Metric.

## 3. GI Conditions Compilation for Development Management (Planning applications and associated planning documents)

3.1 Biodiversity Gain Plan (Condition) - <a href="https://www.gov.uk/guidance/submit-a-biodiversity-gain-plan">https://www.gov.uk/guidance/submit-a-biodiversity-gain-plan</a>

Planning applications subject to mandatory BNG shall require a <u>Biodiversity Gain Plan</u> to be submitted to and approved in writing by the relevant specialism at the Local Planning Authority before commencement. The Environment Act, under paragraph 14(2) of Schedule 7A of the Biodiversity Net Gain Planning Practice guidance sets out that the biodiversity gain plan should cover:

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

#### Reason:

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

- 1. Verify the ecological baseline features of interest.
- 2. Identify ecological mitigation requirements; and,
- 3. Identify management and enhancement requirements relevant to the application area.
- 4. To enhance Protected and Priority Species/habitats and allow the LPA to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

#### 3.2 BNG: Habitat Management and Maintenance Plan

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

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

#### Reason:

In order to ensure measurable net gains are being delivered and effectively maintained and in accordance with LPA's BNG Policy, allowing the LPA to discharge its duties under the NPPF (2024).

#### 3.3 Construction Environmental Management Plan (condition)

No development shall take place until there has been submitted to and approved, in writing, by landscape specialists at the Local Planning Authority a Construction Environmental Management Plan (CEMP). Ideally, strategic elements of the GI framework are brought forward in phase one of the development, to create a landscape

structure or evidence is shown that substantive GI is secured as early as possible in initial phases of delivery to allow early establishment. Therefore, a Construction Environmental Management Plan (CEMP) will be required to set out how retained GI, such as trees, hedges and vegetation, as well as any nature designated sites (e.g. SSSi's etc.) will be protected during construction.

#### Reason:

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

#### 3.3.1 Green Infrastructure Plan for projects 250+

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

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

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

#### 3.4 Green Infrastructure Strategy

No works shall take place until a detailed Green Infrastructure / Landscape Strategy for the site, based on the Essex Green Infrastructure Strategy and Essex GI Standards and an assessment of the ecological context of the development, has been submitted to and approved in writing by a Landscape specialist at the Local Planning Authority. The scheme should include but not be limited to:

- The development should be designed to deliver Biodiversity Net Gain and wider environmental net gains, that forms an important component of nature recovery networks and the wider landscape scale GI network.
- Demonstrate that the development site/setting has been reviewed for multiple functions and benefits (listed in the Essex GI Strategy (chapter 5.1, page 35) and ensure that green/open spaces are designed to ensure multi- purpose and functional use.
- Travel Infrastructure should give consideration to use of GI features to ensure accessibility across the site.
- Ensure there are good accessible links for all from the development to existing settlements, urban centres, rural areas, active travel networks and green spaces.

- Demonstrate how the GI has been designed to provide recreational facilities for different user and age groups. It should deliver social inclusive processes that are open to all and incorporate the knowledge and needs of diverse parties.
- Tree Planting should be undertaken on site wherever possible.

#### Reason:

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

The National Planning Policy Framework 2024 paragraph 8c sets environmental protection and enhancement as one of the 3 objectives of the planning system. Paragraph 96(c) states that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and (paragraph 164(a)) can deliver wider benefits for nature and support efforts to address climate change.

#### 3.5 Landscape Ecological Management Plan (Condition)

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

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

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

#### Reason:

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

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

#### 3.5.1 yearly logs of maintenance (Condition)

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

#### Reason:

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

#### 3.6 Restoration and Decommissioning plan (Condition)

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

#### Reason:

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

## 4. GI Advisory Planning Note/Letter Informative

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

- Tree Planting. There are also opportunities to work with the Essex Forest Initiative to assist. (<a href="mailto:environment@essex.gov.uk">environment@essex.gov.uk</a>)
- Link to Essex GI Standards <u>Essex Green Infrastructure Standards | Essex</u>
   Design Guide
- Link to the Biodiversity Net Gain Guidance Pack Essex Local Nature Partnership: <u>Guidance on Biodiversity Net Gain (canva.com)</u>

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

Mitigating and adapting to a changing climate is a national, Local and Essex County Council priority. The Climate Change Act 2008 (amended in 2019) commits the UK to achieving net-zero by 2050. In Essex, the <a href="Essex Climate Action Commission">Essex Climate Action Commission</a> proposed 160+ recommendations for climate action. Essex County Council is working with partners to achieve specific goals by 2030, including net zero carbon development. All those active in the development sector should have regard to these goals and

applicants are invited to sign up to the <u>Essex Developers' Group Climate Charter</u> [2022] and to view the advice contained in the <u>Essex Design Guide</u>. Climate Action Advice guides for residents, businesses and schools are also available.

## 4.3 Standard GI Informative (to be added at the end of letter of response) INFORMATIVES:

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

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

## 5.1 General Introduction (taken from Braintree Local Plan Ideas response)

ECC seeks to manage the county's resources in a sustainable manner to protect, restore and enhance the natural environment. The ECC Green Infrastructure Strategy (GIS) seeks to protect, create, and improve green infrastructure for biodiversity and people; improve connectivity and inclusivity, by supporting healthier, more active lifestyles; and contribute to economic growth. ECC has adopted Green Infrastructure Standards to guide the future protection, enhancement, management and expansion of Green Infrastructure within new developments and future decision-making working in partnership with the Essex Local Nature Partnership, Local Planning Authorities and other stakeholders. In addition, ECC gathers evidence about the benefits of existing green infrastructure; improves the quality of green space in Essex; explores the role of green infrastructure in planning (local plans); manages open spaces alongside urban growth; and undertakes green infrastructure projects.

#### 5.2 Accessibility to Green Infrastructure

**INSERT POLICY/STRATEGY** should identify where developer contributions/ regional and local growth can be used to help enhance and increase the accessibility of existing GI and outline opportunities to increase the provision of accessible, multifunctional GI through new initiatives. Moving forward, ECCs GI recommends the use of the National

Green Infrastructure Framework S2-<u>Accessible Greenspace Standard</u> (previously known as Accessible Natural Green Space Standard (ANGSts)). Where it is recommended that everyone has access to good quality green and blue spaces close to home (within fifteen minutes' walk) for health and wellbeing and contact with nature.

#### 5.3 Active Travel Routes and GI

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

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

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

The Essex LNP is working towards a joint approach to BNG, including potential joint specific measurable targets (10% or 20% BNG). An Essex BNG Guidance Pack has been produced providing an overview on BNG to date. LPAs, including xx, in Essex are co-funding a shared countywide BNG officer for a 2-year period.

A Biodiversity Net Gain Template was circulated to Essex Local Authorities either as a stand-alone document to be adopted in its entirety or sections that can be used to supplement existing LPA work. It will help developers, applicants, LPAs, decision makers, and landowners by summarising guidance on planning for and delivering biodiversity net gain, signposting to detailed guidance, and setting out LPA expectations for BNG. The template is presently being reviewed by the EPOA BNG Task Group in light of new legislation changes and government guidance. The revised document will be in the form of an advisory document or a "how-to-guide" which can be used across the county to create feasibility in the BNG process.

#### General Text for Local Plans going for minimum 10% BNG

ECC and the Essex Local Nature Partnership (ELNP) has published its `Viability Assessment of Biodiversity Net Gain in Essex, February 2025' which can be viewed here. The assessment concluded that achieving 20% BNG for a range of residential and commercial development typologies and Nationally Significant Infrastructure Projects (NSIPs) is a relatively small percentage of overall cost. The viability assessments demonstrate that a 20% BNG is achievable and viable and meets the NPPF requirements, which emphasises measurable net gains for biodiversity. The Environment Act sets 10% as the minimum standard nationally and does not set a maximum.

#### 5.5 Biodiversity Credits (ECC Pilot Project -IRF)

The Essex Net Zero Innovation Futures: Natural Environment Investment Readiness Project aimed to support several of the objectives that have been set out by ECC and is an initiative within the ECAC Climate Focus Area. This project aimed to unlock

investment in natural capital interventions at four sites in Essex, of which the following are located within Braintree, Maldon districts and Colchester City:

- Spain's Hall Estate (832 ha) current land use is arable and grassland. Planned land use changes include creating and/or enhancing woodland, grassland, scrub, hedgerow, rewilding (reintroducing species), planting silvo-arable and silvo-pasture trees as part of an agroforestry scheme. Spain's Hall is one of only five national BNG Credits pilot sites with BNG units available from their habitat bank and two additional phases over the next 24 months generating a total of over 500 BNUs. Their project is in line with the ECAC's Land Use and Green Infrastructure Recommendations, BDC's Climate Change Strategy and Biodiversity Action Plan. All work is in line with the NPPF, 25 Year Environment Plan, Green Finance Strategy and Nature Markets Framework.
- Wildfell (previously Gray's Farm 120 ha) current land use is arable. Planned land use changes include creating and/or enhancing heathland, grasslands, mixed woodlands and ponds, nature recovery. The S106 agreement needs to be progressed to enable this site to become a habitat bank and for the project to progress.
- Braxted Park (323 hA) located bordering Braintree in Maldon district. Current land use is arable and grassland. Planned land use changes include creating and/or enhancing grasslands, mixed scrubs, woodlands, and lakes/ponds. Currently the S106 agreement to become a habitat bank is being looked through by Bidwells, operating as the land management team.
- Abborts Hall Farm (282.91 hA) in Colchester owned by Essex Wildlife Trust. Rewilding of the farmland. Planned land use changes include creating and/or enhancing grasslands, wetland habitats, heathland and shrubs, hedgerows, woodlands, and lake habitats.

#### 5.6 Climate Change

Local plan policies on climate change should include green infrastructure because it enhances climate resilience by managing stormwater, reducing flooding, and mitigating urban heat islands. It also improves air quality, enhances biodiversity, and reduces carbon emissions. Access to green spaces promotes physical activity, reduces stress, and improves mental health. Additionally, green infrastructure offers economic advantages by lowering energy costs, creating green jobs, and boosting property values. It also fosters social cohesion by providing areas for community interaction and recreational activities.

#### 5.7 Connectivity

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

i.e.

 Every effort needs to be made to ensure that connections between green spaces, local amenities and developments are achieved to ensure that routes make

- sustainable connections and are attractive through the delivery of GI for the benefit of the new community and existing communities.
- ECC recommends including 'improvements or greening the public realm (i.e., street trees, dual purpose street furniture with planters, rain gardens etc)'.

#### 5.8 Considerations for preparing the new Plan.

ECC recommend the following are considered in preparing the new Plan:

- the use of a robust evidence base to inform GI related planning practice; for making planning decisions on applications; and developing masterplans and development briefs. Local assessments of green space, recreational and sports facilities can supplement these practices.
- implementation of the Essex GI Strategy and Standards.
- the development and inclusion of good practice GI policies. Policies should be strongly worded `requiring' positive action for the implementation of multifunctional GI. The need for and importance of GI should be incorporated within a range of policies within the plan, as well as the provision of an overarching GI policy (see below). This is a useful tool to access the strength of wording and coverage of Gi throughout the Local Plan. <a href="https://mainstreaminggreeninfrastructure.com/project-page.php?green-infrastructure-planning-policy-assessment-tool">https://mainstreaminggreeninfrastructure.com/project-page.php?green-infrastructure-planning-policy-assessment-tool</a>
- where appropriate preparing supplementary planning documents / guidance to provide explanatory / more detailed or site-specific guidance, this may be through design codes.
- reference locally to designated public rights of way (PROW) which
  provide an important means of connecting GI areas. PROW information
  is available here.
- establishing multifunctional greenways to promote sustainable and active travel movements and contribute to health and wellbeing. These routes should be funded by developers where they directly relate to development and their design consistent with Cycling infrastructure design (LTN 1/20).
- identify and protect valued green space, including the Green Belt (outside of urban areas) but also local green space within developed areas, through a 'Local Green Space' designation.

#### 5.9 Developer Contribution

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

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

maintain open space or to improve existing provision in lieu of the provision of the full standard on site.

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

#### 5.10 Early Engagement

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

#### 5.11 Employment provision

ECC expects planning policies to set out requirements for employment areas that embed healthy and place making principles such as high-quality, pedestrian and cycle friendly environments, access to green spaces and amenities for employees within walking distance of their workplace, to ensure that employees have attractive and healthy environments to work in, support their health and wellbeing and to create environments, spaces, and places that are attractive to businesses and inward investment.

#### **5.12 Essex Climate Action Commission**

ECCs GI team expects **INSERT** LA / or Strategy title to make a strong commitment towards the delivery of multifunctional green infrastructure and biodiversity net-gain. The Essex Climate Action Commission's (ECAC) July 2020 report, Net-Zero: Making Essex Carbon Neutral; outlines the importance of the GI for biodiversity, flood and drought control, soil health, air quality, reduced urban heat island effect and human health and wellbeing. The ECAC report (page 19, 33, 35 and 38) made the following key recommendations with regards green infrastructure:

- 30 per cent of all land in Essex will enhance biodiversity and the natural environment by creating natural green infrastructure. We expect these figures to be 25 per cent by 2030 and 30 per cent by 2040.
- 50 per cent of farmland in Essex will adopt sustainable land stewardship practices by 2030; 75 per cent by 2040 and 100 per cent by 2050.
- To increase urban greening 30 per cent greening of our towns, villages, and new developments by 2040: increased greenspace creation, naturalising existing green space, greening the public realm, and developing SuDS. Every citizen of Essex can contribute by making space for nature, either in their own gardens or buildings, or through communal areas where they live.
- For the 75,000 properties in Essex still at risk of flooding, we will develop schemes to increase their flood resilience by 2050 and aim for three-quarters of the schemes developed to include integrated water management and natural flood management techniques.

- Develop and agree new policy on coastal flooding and erosion risk management that specifies long-term, evidence-based, quantified outcomes that have the buyin of the affected communities and stakeholders.
- Coastal flood resilience schemes in critical areas to be implemented by 2023.
- District Local Plans should reflect the Government's 25-year Environment Plan and incorporate green infrastructure, including making sustainable drainage (SuDS) as a default requirement on all new developments, supported by the developer contribution.
- New developments (buildings and infrastructure) should have SuDS as the default option and only be given the right to connect to the sewer system once national SuDS standards have been met.
- Introduce a stronger policy on sustainable drainage (SuDS) which will replicate natural water drainage. There must be clarity on who is adopting and maintaining the SuDS systems.
- Create a Climate Focus Area (CFA) to accelerate action and provide exemplars, for learning and innovation: adopting Sustainable Land stewardship practices: 100% by 2030 and Natural Green Infrastructure: 30% by 2030.

## 5.13 Essex Climate Focus Area (NB text currently being reviewed) Recommendations for text to support CFA in Local Plans and Neighbourhood Plans if appropriate.

The Local Plan/ Neighbourhood plan is within the Essex Climate Action Commission's (ECAC) recommended <u>Climate Focus Area</u> (CFA), which is formed of the Blackwater and Colne River catchment areas (please see Figure 1). The CFA has been established to demonstrate best practice in sustainable land use management and help implement the recommendations in the ECAC's report <u>Net-Zero: Making Essex Carbon Neutral (July 2021)</u>.

The objective of this recommendation is for the CFA to "accelerate [climate] action and provide exemplars, for learning and innovation: adopting Sustainable Land stewardship practices: 100% by 2030 and Natural Green Infrastructure: 30% by 2030" (ECAC, 2021). Among the objectives of the CFA are to achieve net zero carbon, biodiversity net gain, improve soil health and air quality, reduce flooding and urban heat island effect, and enhance amenity, liveability and wellbeing of Essex communities. It will achieve this by wholesale landscape change in rural areas and urban areas. The CFA will look to developments to contribute to these targets.

#### Figure 1: Map of ECACs Climate Focus Area – Use map above under 3.14.1

The overall goal of the CFA is to achieve net zero carbon emissions through carbon reduction and carbon sequestration methods (e.g. Afforestation, reforestation, improved forestry or agricultural practices, and revegetation). The secondary goal of the CFA is to become more climate change resilient by:

- improving soil health and access to natural green space and increasing biodiversity
- reducing air pollution,
- reducing flooding,

- reducing the urban heat island effect,
- improving the amenity and liveability of Essex communities

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

#### **5.14 Essex GI Strategy and Standards**

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

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

#### Example of a recommendation:

To align with the adopted <u>Essex GI Strategy</u> and <u>Standards Guidance</u> which have been endorsed by Natural England and awarded <u>Building with Nature Policy</u> accreditation.

#### 5.15 Essex GI Standards (2022)

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

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

#### **Essex GI Principles and Standards:**

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

#### 9. Stewardship

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

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

#### Other comment

The Strategy and Standards can be found on the Essex Design Guide (EDG) website. However, for clarity and to strengthen the Plan, ECC recommend paragraph x should refer to applicants being required to have regard to the use of the <a href="Essex Green">Essex Green</a> <a href="Infrastructure Standards">Infrastructure Standards</a>, 2022 in order to facilitate securing multifunctional green infrastructure. The standards have been supported and endorsed by Natural England, were prepared in consultation with all Essex local authorities (including the City Council) and align with the <a href="National Green Infrastructure Framework">National Green Infrastructure Framework</a>. This framework includes a <a href="Developers and Design Teams Green Infrastructure process journey">Developers and Design Teams Green Infrastructure process journey</a>.

#### **5.16 Essex GI Strategy (2020)**

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

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

#### **Essex GI Objectives:**

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

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

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

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

#### 5.17 Essex is Green StoryMap

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

For further details, please visit < Green Essex (arcgis.com) >

#### **5.18 Essex Local Nature Partnership**

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

<u>Objectives Summary</u>: In March 2022, the Essex Local Nature Partnership (LNP) was Established. The Essex LNP is an independent body to that of ECC that meet quarterly (for further details, please visit: < < <u>Essex Local Nature Partnership ></u>). The ELNP will contribute to the delivery of the recommendations in the ECAC report Net-Zero: Making <u>Essex Carbon Neutral</u> (July 2021) and the ECC Response. The Essex LNP has committed to the delivery of four key targets: -

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

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

#### 5.19 Essex Local Nature Recovery Strategy (ELNRS)

ECC is the 'Responsible Authority' for delivering the Essex Local Nature Recovery Strategy (ELNRS) working closely with the Essex LNP to provide direction and ensure key stakeholders are engaged. The LNRS will form the baseline for habitat information, which in turn will generate action to promote biodiversity management and improvement (including identifying strategic opportunity areas) and will provide further useful information. The LNRS plays a crucial role in Biodiversity Net Gain (BNG) by offering a strategic approach to off-site BNG delivery. The LNRS includes strategic opportunity

maps highlighting areas with the highest potential for environmental benefits for new habitat creations across Essex. Sites of strategic significance offer a 15% uplift in biodiversity units compared to other sites, providing a 15% bonus on units purchased in these locations.

#### I.e. ECC's role as:

Responsible Authority for the Essex Local Nature Recovery Strategy (the draft LNRS went out to public consultation end of August 2024). The Essex LNRS aims to deliver practical, county-wide initiatives for nature recovery and identifies areas of current particular importance for biodiversity and opportunity locations where habitat creation or improvement can provide multiple benefits for nature and the environment.

#### Local Plan necessary assessments to include:

Consider the Local Nature Recovery Strategy, which will identify areas of current importance for biodiversity and strategic opportunity locations for habitat creation and improvement and off-site biodiversity provision. This will ensure a strong relationship between new development proposals and relevant strategic opportunity locations.

#### Update to general comment

As the 'Responsible Authority', ECC support the requirement for new development being required to maximise opportunities for the preservation, restoration, enhancement, and connection of natural habitats in accordance with the Essex Local Nature Recovery Strategy or future replacements.

The Essex Local Nature Recovery Strategy is set to be published and adopted in July 2025. The Natural Environment section of planning practice guidance has been updated in February 2025 to include guidance on the role of LNRSs and can be viewed here. This guidance helps local planning authorities (LPAs) to interpret their duty to "have regard" to LNRSs and integrate LNRSs into local plans and considering them in planning decisions as material considerations. LPAs should evaluate how individual development proposals can conserve and enhance biodiversity and geodiversity, as well as contribute to habitat connectivity in the broader area.

This update is a legal requirement from the Environment Act 2021 and aligns with the National Planning Policy Framework (NPPF).

Further reforms to the planning system are expected in 2025, with new duties for plan makers to "take account" of LNRSs as outlined in the Levelling-Up and Regeneration Act (LURA) 2023.

#### General comment on LNRS

The Environment Act 2021 introduced a number of measures to support local nature recovery, including Local Nature Recovery Strategies (LNRS). These strategies are locally led and establish priorities for nature recovery. Local authorities have a duty to conserve and enhance biodiversity, and to report on their actions. They must also consider LNRS in their planning decisions and that these are integrated into the planning system to ensure that planning decisions better reflect areas with the greatest potential for nature recovery.

General Comment for Specific Developments i.e. NSIPs

It is recommended that the xx have regard for the Local Nature Recovery Strategy, which will identify areas of current importance for biodiversity and strategic opportunity locations for habitat creation and improvement and off-site biodiversity provision. This will ensure a strong relationship between new development proposals and relevant strategic opportunity locations to ensure that development contributes positively to biodiversity and the natural environment.

There is the opportunity to contribute to the biodiversity priorities outlined in LNRS, including identifying and protecting key habitats and species. Utilising local habitat maps provided by LNRS can not only help guide the placement (of future projects), but also help in the design of infrastructure projects, minimising ecological disruption and enhancing habitat connectivity. Implementing sustainable management practices, such as creating wetlands, restoring peatlands, and planting trees and hedgerows, can mitigate the environmental impact of NSIPs. Additionally, following statutory guidance and continuously monitoring the environmental impact ensures that infrastructure projects contribute positively to biodiversity and nature recovery.

The maps have not been published and as a result of the consultation it is understood that there may be minor edits to the mapping, but you can email <a href="mature.partnership@essex.gov.uk">nature.partnership@essex.gov.uk</a> or contact Elias Watson - Local Nature Recovery Coordinator <a href="mature.gov.uk">elias.watson@essex.gov.uk</a> to provide further details.

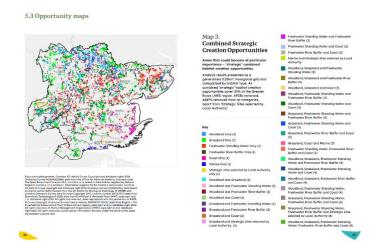
In summary the Essex LNRS includes two main types of maps:

- Areas of Particular Importance for Biodiversity (APIB) Maps: These maps highlight
  national conservation sites, local nature reserves, local wildlife sites, and irreplaceable
  habitats in Essex, covering a total of 56,226.27 hectares, which is 14% of the county.
- Opportunity Maps: These maps identify areas in Essex that could become important for biodiversity and help connect existing habitats. They outline potential measures to create larger, better-connected habitats in line with biodiversity priorities.

The opportunity maps in the Essex Local Nature Recovery Strategy (LNRS) are divided into two types:

- All Creation Opportunities Maps: These maps show all locations of particular importance for biodiversity, including areas that overlap with Areas of Particular Importance for Biodiversity (APIB).
- Strategic Creation Opportunities Maps: These maps highlight the top locations within all available opportunities that have the greatest potential to benefit nature and the environment. These strategic sites, selected by Local Authorities, are eligible for a 15% uplift on standard biodiversity units and do not overlap with APIBs. They cover 119,172.53 hectares (30.18% of Essex) and aim to increase green and blue infrastructure to 25% of Essex by 2030.

Screen shot of the 'All Creation Opportunities' maps taken from the consultation document



The following provides a detailed view of maps highlighting Areas of Particular Importance for Biodiversity and the Combined Strategic Habitats creation for each section. These maps indicate whether there are strategic opportunities eligible for a 15% uplift on standard biodiversity units and show nearby habitats, such as freshwater and grassland connectivity opportunities.

#### 5.20 Green Belt and GI

ECC recommend consideration of the updates to the National Planning Policy Framework (NPPF), December 2024 in relation to included enhancements and provisions of green spaces within the Green Belt. The updated NPPF emphasises the importance of improving green spaces to contribute positively to the landscape setting of developments, support nature recovery, and meet local standards for green space provision, while preventing urban sprawl.

"A Greener Green Belt? Co-developing Exploratory Scenarios for Contentious Peri-Urban Landscapes" by Matthew Kirby, Alister Scott, and Claire L. Walsh explores the future of England's Green Belts. It identifies three scenarios for the next 20 years: "Intensify & Diversify," "Build-Build-Build," and "Multifunctional." These scenarios highlight the pressures from conflicting land uses and societal demands. The study reveals a consensus for more multifunctional Green Belts, which could serve as strategic urban support landscapes to address climate change. https://researchportal.northumbria.ac.uk/en/publications/a-greener-green-belt-co-developing-exploratory-scenarios-for-cont

#### 5.21 Key documents recommend when preparing Local Plan

ECC recommend the following documents are used in preparing the review Local Plan and which also identify potential ECC requirements on applicants/developers, such as developers' contributions.

• Essex Green Infrastructure Strategy (2020) - seeks to protect, create, and improve green infrastructure for biodiversity and people; improve connectivity and inclusivity, by supporting healthier, more active lifestyles; and contribute to economic growth.

- Essex Green Infrastructure Principles and Standards 2022. the nine GI principles/ standards seek to demonstrate what 'good likes like' in designing and delivering GI and align with the national GI framework / standards.
- Essex Green StoryMap (2022) is the evidence base to inform GI policies, strategies and projects and sets out a spatial analysis of GI provision across Essex.
- Flood Management / SuDs; Landscapes and Greenspaces and Building with Nature sections of the EDG also provide content on GI.

#### 5.22 Landscape Led Approach

To promote the adoption of a landscape-led approach in developments, it is crucial to emphasise the integration of natural landscapes into the planning and design process. This approach prioritises the preservation and enhancement of natural features, such as green spaces, water bodies, and biodiversity, to create sustainable and resilient communities. By incorporating a landscape-led strategy, developments can achieve multiple benefits, including improved environmental quality, enhanced aesthetic appeal, and increased recreational opportunities for residents.

#### 5.23 Landscaping and Open Spaces (Multipurpose Spaces)

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

#### 5.24 Local Wildlife Sites

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

#### 5.25 Mainstreaming and Integration of GI

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

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

#### Alternative wording

ECC consider that all major and strategic development sites should be designed around green and blue infrastructure to inform and shape the development and be based on the Essex GI standards and principles. ECC expects GI to be at the heart of the decision making at every stage in the planning process. GI should be considered at the earliest stage in the planning process and is expected to be incorporated into design guides and masterplans.

#### 5.26 Multifunctional Green Infrastructure

#### 5.26.1 If multifunctional GL is not referenced

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

#### 5.26.2 Hierarchy approach to site location of development

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

#### 5.26.3 New strategic green spaces

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

#### 5.26.4 Benefits of Multifunctional GI

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

#### **5.27 Natural Flood Management**

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

#### 5.27.1 Sustainable Drainage Systems

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

#### 5.28 Natural Play and Outdoor Learning

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

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

#### 5.29 NPPF Reference to GI

The NPPF (2024) recognises the importance of green infrastructure within the planning system to support sustainable development in a number of ways. Paragraph 20(d) states that strategic policies should set out an overall strategy and make 'sufficient provision' for green infrastructure and in paragraph 96(c) looks to green infrastructure to support local health and wellbeing needs and to reduce health inequalities. Paragraph 164(a) states that GI can help in adapting to climate change, while paragraph 199 recommends that planning policies and decisions should identify opportunities to improve air quality through measures such as green infrastructure provision and enhancement. Paragraph 188 states, 'Plans should prioritise land use

based on site designation, minimise environmental impact ...take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries. Paragraphs 156(c) and 159 states that for major housing developments on Green Belt land, new or improved public green spaces should be provided, ensuring residents have access to quality green spaces nearby. These improvements must enhance the landscape, support nature recovery within Local Nature Recovery Strategies, and meet local or Natural England standards for Accessible Green Space and Urban Greening Factor provision.

#### 5.30 New Tree planting and early establishment

"All new trees on new developments will have their establishment considered at the time of planting. This should include weeding, mulching and watering. All newly planted trees with a trunk diameter of 6cm or more will be watered for three years via a buried watering tube, irrigation bag or irrigation well; applying 60 litres per visit, at least 14 times between May and September. Mulch, stakes, ties and weed establishment will also be inspected and actioned as required. Stakes and ties should be removed 3 years after planting."

#### 5.31 Urban Greening

To include the reference to urban green to the seaside towns. Urban greening involves incorporating green spaces into towns and cities, delivering environmental, climate adaptation, health and wellbeing, economic and sustainability benefits. Urban greening makes cities more liveable and resilient.

#### Nature Towns and Cities

The new Nature Towns and Cities accreditation launched 2025 aims to integrate green spaces into urban areas to improve residents' quality of life. This initiative helps local authorities collaborate with communities to bring nature into neighbourhoods, making urban areas healthier, happier, and more resilient. Access to green spaces reduces pollution, mitigates heat, and prevents flooding, while also providing areas for recreation and socialisation. By 2035, the goal is for 5 million more people to have easy access to nature and green spaces, and for 1 million more children to grow and play in greener environments. <a href="https://naturetownsandcities.org.uk/">https://naturetownsandcities.org.uk/</a>

#### 5.32 School grounds

The external environment around schools and the expectations for children's safety, health and facilitating the ease of use of active transportation to and from school is set in the Developers' Guide. The EDG provides supplementary guidance with regards school design seeking to ensure the appropriate design of buildings addresses the development context; environmental constraints of the site while encouraging health and wellbeing, enhanced biodiversity, green spaces for natural play, and contribute to climate change mitigation measures and adaptation and the curriculum, including features to support sustainable accessibility across all user groups.

#### 5.33 Social Equity and Inclusion

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

#### 5.34 Stewardship

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

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

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

#### ECC recommends the consideration of:

Good practice GI policies should be developed and included. Policies should be strongly worded 'requiring' positive action for the implementation of multifunctional GI. The need for and importance of GI should be incorporated within a range of policies within the plan, as well as the provision of an overarching GI policy. This is a useful tool to access the strength of wording and coverage of GI throughout the Local Plan and identify any gaps and opportunities to incorporate GI to deliver multiple benefits across the local plan.

https://mainstreaminggreeninfrastructure.com/project-page.php?green-infrastructure-planning-policy-assessment-tool

#### 5.36 Urban Greening

This policy should encourage urban greening. Urban greening involves integrating green spaces and natural elements into urban environments, such as parks, green roofs, and street trees. This practice aims to improve air quality, reduce urban heat, support biodiversity, and enhance residents' physical and mental well-being. By creating more sustainable and liveable towns and cities, urban greening helps mitigate climate change impacts and fosters social cohesion.

Tools

The new Nature Towns and Cities accreditation launched 2025 aims to integrate green spaces into urban areas to improve residents' quality of life. This initiative helps local authorities collaborate with communities to bring nature into neighbourhoods, making urban areas healthier, happier, and more resilient. Access to green spaces reduces pollution, mitigates heat, and prevents flooding, while also providing areas for recreation and socialisation. By 2035, the goal is for 5 million more people to have easy access to nature and green spaces, and for 1 million more children to grow and play in greener environments. https://naturetownsandcities.org.uk/

Another useful tool to explore is Natural England's <u>Environmental Benefits from Nature tool</u>. It can be utilised to identify opportunities for enhancing broader benefits from nature while avoiding and minimising negative impacts. It is designed to complement the Biodiversity Metric.

#### 5.37 Walkable Neighbourhoods

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

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

#### Example comments regarding achieving outcomes for Sustainable Travel

The report outcomes of `A new development model for Essex' can be viewed here. To assist achieving net zero carbon transport emissions by 2050, the report seeks to demonstrate how delivering more walkable neighbourhoods have wider place-making benefits that go beyond the immediate value of reducing car use, such as increased biodiversity, more usable public open space, better air quality, lowering embodied carbon as well as commercial viability benefits through the potential to increase the number of dwellings within a well-planned, legible and cohesive development.

#### 5.38 Workshop held July 2024 summary of findings.

The GI team and the ECC spatial planning team, working with Northumbria University led two workshops in July 2024to develop practical guidance for incorporating GI into local plan preparation and development management processes. Workshop 1 explored the challenges and opportunities in integrating GBI into the planning process. Workshop 2 concentrated on planning policy; GBI implementation and stewardship using a case study. A key action from the workshops was for each LPA (including Inset Council name) to complete and return to ECC <a href="by6">by6"</a> August</a> a `Process Journey template' based on the National GI Framework to capture what the district currently does against each stage of plan making and development management to identify any gaps, critical learning points, and issues (not just challenges) so that a checklist can be created.

The key messages from the workshops included the need to balance housing development with GI, ensure robust evidence for GBI benefits and its viability, the use

of effective planning tools and coordination across departments and fostering community involvement. The integration of GBI and planning is hindered due to a lack of resources and funding and conflicting priorities among stakeholders. GI sites are frequently isolated, and long-term sustainability is often neglected, leading to GBI degradation. It was considered that unclear local plan policy wording can result in ineffective implementation.

Needs highlighted from the workshops.

- Embedding GBI: Incorporating GBI in local plans.
  - Vision: GBI integrates as part of the vision and objectives.
- Robust Policies: Flexible, adaptable policies to accommodate future changes and address climate change, health and ecological impacts. Policies should align with sustainable goals. Stronger development management policies.
  - Policy Influence: Anticipation of Schedule 3 for Sustainable Drainage Systems (SUDS) implementation.
  - o National Policies: local plans to avoid duplicating NPPF text.
  - Design and Delivery: Consider lifecycle costs, maintenance requirements, and resilience in design.
  - Long-Term Stewardship: Involving local authorities, developers, and community groups. Incorporating educational programs into stewardship efforts. Define clear roles for long-term stewardship.
  - Monitoring and Adaptation: Regular monitoring ensures GBI functions as intended.
- Tools: Utilising tools like Health Impact Assessments (HIAs), Building with Nature and the National GI Framework. HIA highlights the connection between GI, active travel, and health and well-being. Using topic papers and mapping
- Collaboration: Effective stewardship involves collaboration among stakeholders.
  - Community Engagement: Ensuring successful GBI implementation and maintenance through community feedback. Early involvement of the community and quantifying the value of GI. Engaging communities in GBI planning and management.

## 6. GI Comments Compilation for Policy

(Neighbourhood Plans)

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

#### 6.1 General NHP Introduction Comment

Neighbourhood Plans provide a significant opportunity for communities to recognise and recommend new GI as well as efforts to protect, improve and connect to existing GI. Planning for green spaces should be incorporated from an early stage in both the site selection and policy formation processes as an integral part of the wider planning for the area. Whilst there are no statutory requirements for GI, the Government's 25 Year Environment Plan and Environment Act (2021) place significant importance on protecting and enhancing GI, its accessibility and mandatory biodiversity net gain.

#### 6.2 Connectivity and Active travel

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

#### 6.3 Protection and Provision of Green features and opens spaces.

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

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

#### 6.4 Urban GI delivery through Sustainable Design

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

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

#### 6.5 Social Equity and Inclusion/ Early Engagement

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

#### 6.6 Building with Nature

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

#### 6.7 **NEW POLICY: Green Infrastructure (Draft Example)**

A green infrastructure network of multi-functional high-quality green spaces and other environmental features (such as footpaths, street trees, play parks and village greens) will be required across and beyond the development which together delivers multiple environmental, social and economic benefits, by:

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

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

All development proposals must follow a hierarchy to protect existing green and blue infrastructure and maximise on-site green and blue infrastructure, benefiting both people and nature while addressing deficiencies, inclusivity and needs. Enhancing the quality of these features or contributing and investing in nearby green spaces will be necessary if there is no valid reason to provide on-site for the benefit of the present and future communities.

- Using a landscape-led and green infrastructure approach, green infrastructure is an essential component of the development concept as a whole.
- Development will be required to provide a Green Infrastructure Plan outlining how the on-site GI will enhance and support the delivery of environmental

- improvements and Biodiversity Net Gain, improve connectivity and multifunctionality, as well as how green and blue infrastructure will be managed, funded and monitored for the lifetime of the development.
- Development will be required to have regard to the Essex Green Infrastructure Standards and other I standards including "Building with Nature, National Green Infrastructure Frameworks Urban Green Factor and Accessible Green Space Standards" to encourage compliance with this policy will be encouraged.

#### This information is issued by.

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