

Green Infrastructure and the National Planning Policy Framework 2

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National Planning Policy Framework

Presented to Parliament
by the Secretary of State for Ministry of Housing, Communities and
Local Government
by Command of Her Majesty

July 2018

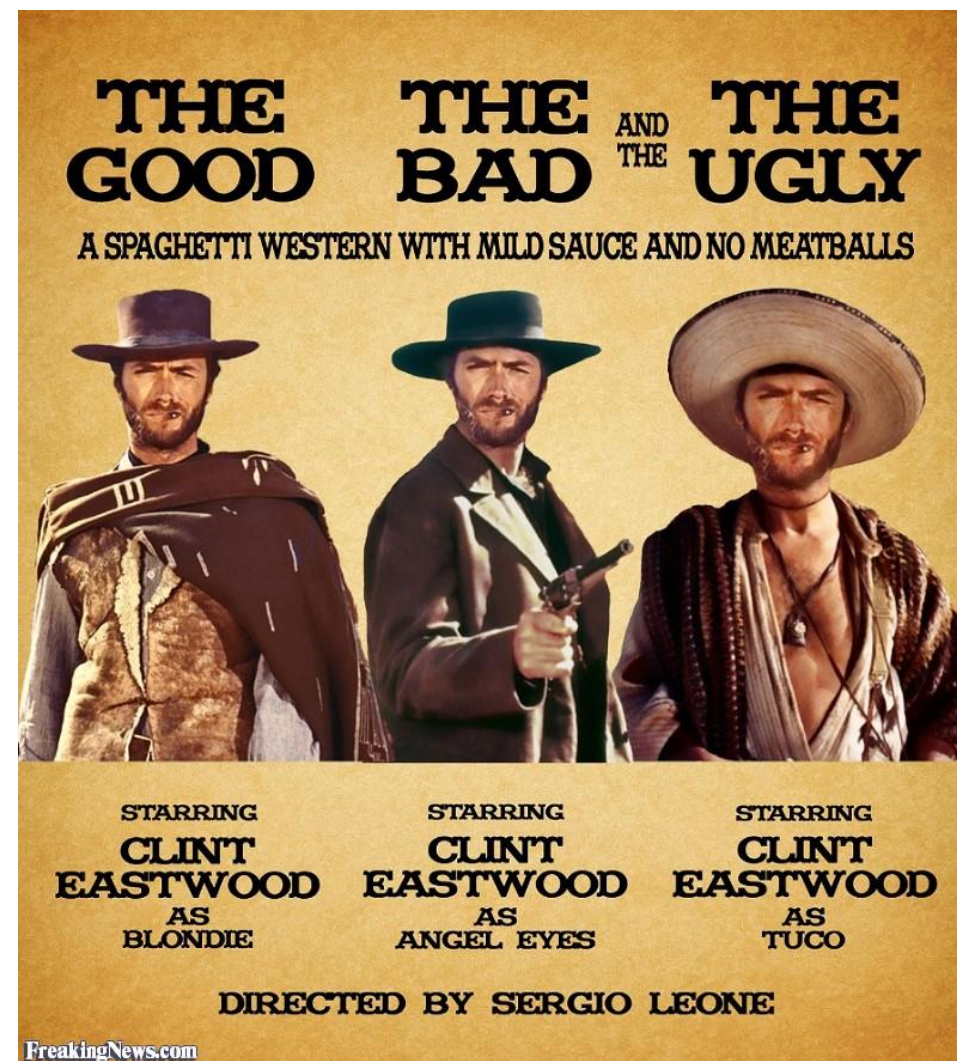


A Green Future: Our 25 Year Plan to
Improve the Environment



Plan

- What is green infrastructure
- The NPPF lens vs 25 YEP lens
- Developing an Evaluation Framework for GI policy
- NPPF evaluation results
- Where next

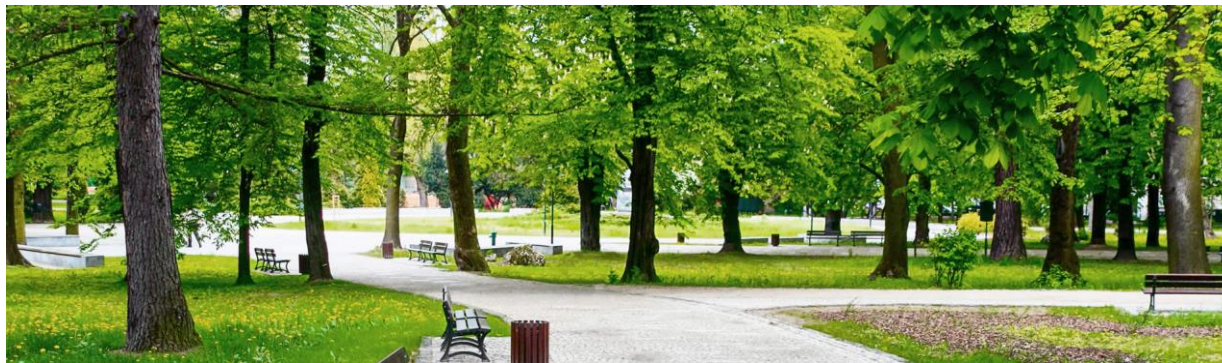


“The NPPF: A spaghetti policy framework with mild GI and limited nature protections”

What is green infrastructure

- A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities

ˆGlossary (MHCLG, 2018:67)



- “Green infrastructure is a **strategically planned network** of natural and semi-natural areas with other environmental features **designed and managed to deliver a wide range of ecosystem services** such as water purification, air quality, space for recreation and climate mitigation and adaptation. This network of **green (land) and blue (water) spaces** can improve environmental conditions and therefore citizens' health and quality of life. **It also supports a green economy, creates job opportunities and enhances biodiversity**”.

http://ec.europa.eu/environment/nature/ecosystems/index_en.htm

- Also seen as a critical infrastructure and not just green space. (Shaffler, 2013)

What is the Green Infrastructure Problem/Opportunity ?

- GI is not readily understood within a wider ecosystem science and natural capital vocabulary
- GI is often bolted on to development
- GI is the first casualty of budget overspends and cuts
- GI is readily trumped by economic considerations
- Research has shown benefits of GI through multiple tools but not effectively translated into delivery mechanisms
- Lack of statutory and regulatory policy context for GI .



The NPPF lens



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The NPPF demystified

- The NPPF is “a framework within which locally-prepared plans for housing and other development can be produced”
- “Material consideration in planning decisions”
- (NPPF) “should be read as a whole (including its footnotes and annexes)”.
- “Presumption in favour of development plan unless material considerations dictate otherwise”
- Rules, dictate or guidance?



Presumption in favour of SD

BUT

- Does not make reference to UN Sustainable Development goals.



11. Plans and decisions should apply a presumption in favour of sustainable development.

For **plan-making** this means that:

- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁵, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area⁶; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

For **decision-taking** this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed⁶; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Strategic vs Local Policies

- **See a new minimum requirement to produce strategic policies**
- housing (including affordable housing), employment, retail, leisure and other commercial development;
- **infrastructure** for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- community facilities (such as health, education and cultural infrastructure); and
- conservation and enhancement of the natural, built and historic environment, including landscapes and **green infrastructure**, and planning measures to address climate change mitigation and adaptation.

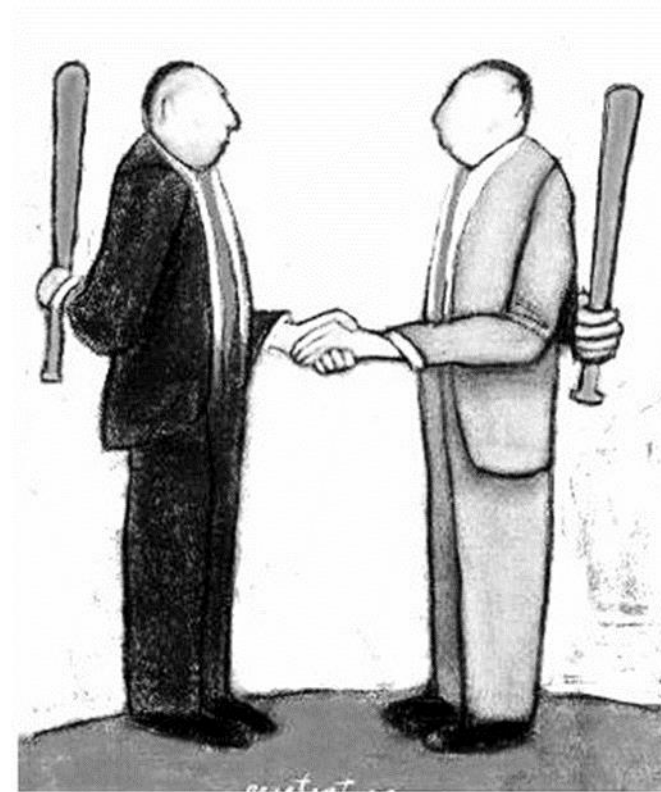
- **Local Policies** means local plans are **optional**

set out more detailed policies for specific areas, neighbourhoods or types of development.

This can include allocating sites, the provision of infrastructure and community facilities at a local level, **establishing design principles, conserving and enhancing the natural and historic environment** and setting out other development management policies.

Statements of common ground

- Updating the old duty to cooperate
- Important for LAs to identify and plan for strategic cross boundary issues.
- Previously dominated by housing need.
- Issues of GI, climate change and flooding limited and their absence never resulted in a plan being failed at inquiry .



NPPF vs 25 Year Environment Plan : A disintegrating policy landscape?

- HM Government Environment plan signed up to by all government departments.
- MHCLG view 25 YEP in parallel to NPPF thus only have limited reference to contents.
- 25 YEP explicitly mentions industrial strategy and clean growth strategy but only mention of NPPF is for SuDs.
- Lowest common denominator in all plans = natural capital (key hook to build)

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Missing NPPF policy synergy with 25YEP

- 25YEP Page 16 “A healthier environment also helps deliver social justice and a country that works for everyone. For example, pollution affects us all but it is the most disadvantaged in society who suffer more. ... We want to ensure an equal distribution of environmental benefits, resources and opportunities”.
- “develop a Nature Recovery Network providing 500,000 hectares of additional wildlife habitat, more effectively linking existing protected sites and landscapes, as well as urban green and blue infrastructure”.

Missing NPPF policy synergy with 25YEP

- 25YEP Page 33 “We will seek to embed a ‘net environmental gain’ principle for development to deliver environmental improvements locally and nationally. 25YEP Page 34 “Making sure that existing requirements for net gain for biodiversity in national planning policy are strengthened, including consulting on whether they should be mandated”
- 25YEP Page 20 “Over the next 25 years, our policy choices will be better-informed with a natural capital approach”.

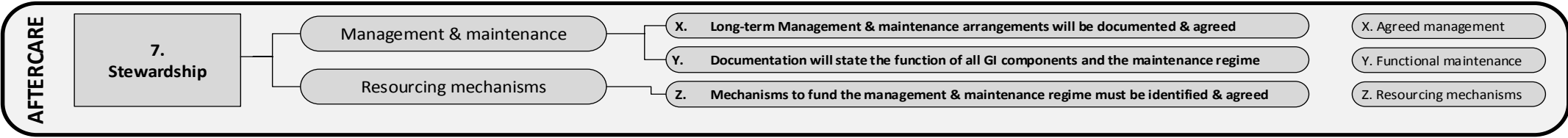
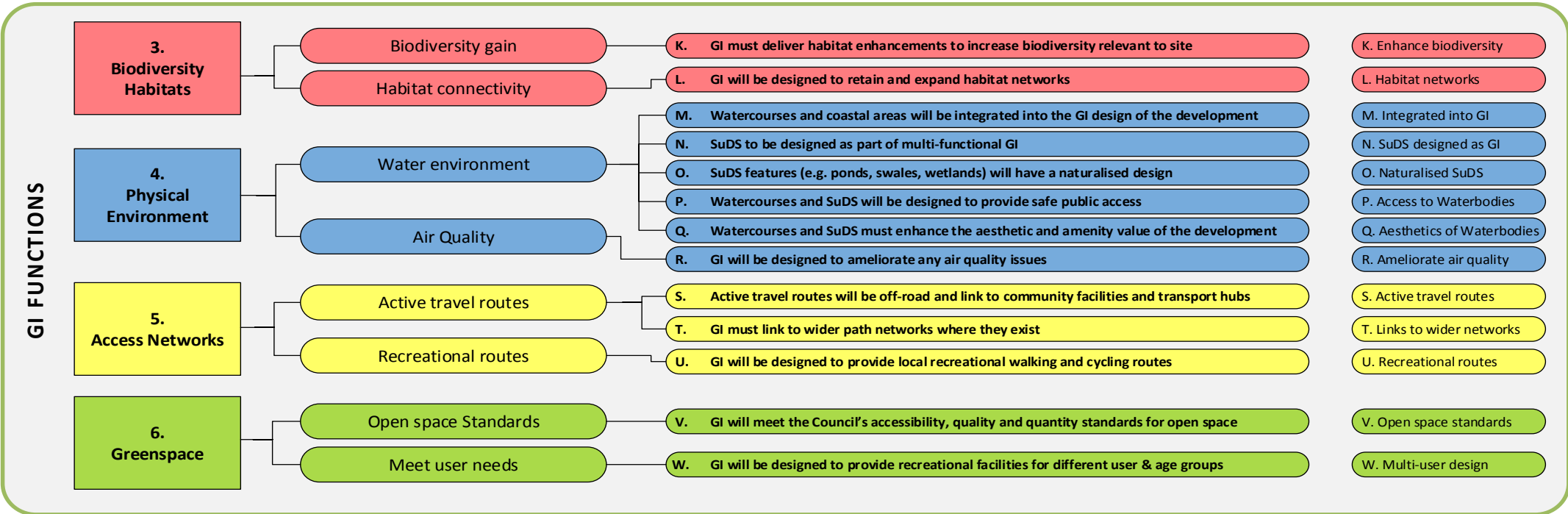
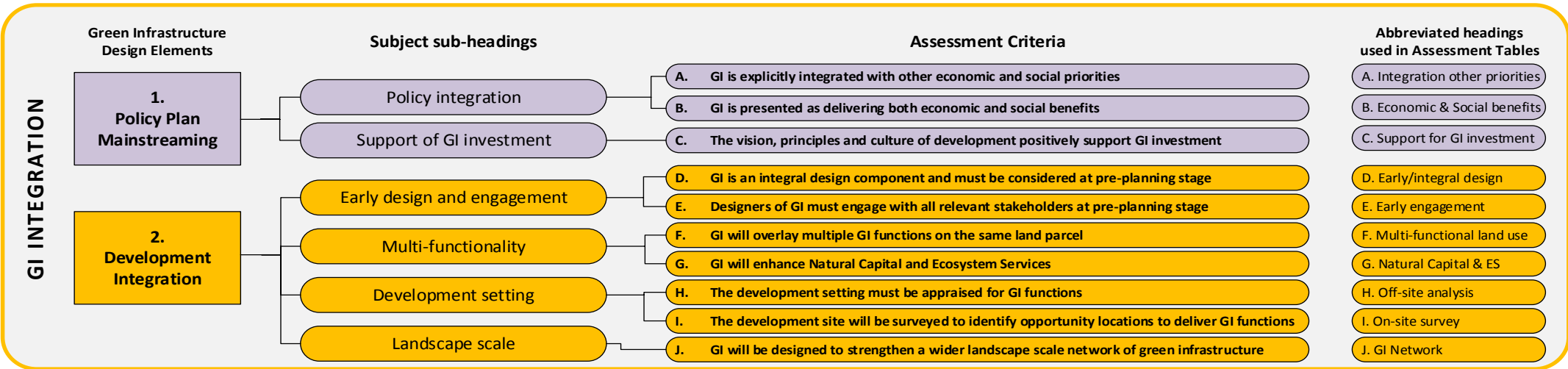
Other missed GI opportunity spaces.

- Ensuring the vitality of town centres (Chapter 7)
- Making effective use of land (Chapter 11)
- Achieving well designed places (Chapter 12)
- Green Belt (Chapter 13)
- Viability (updated NPPG)

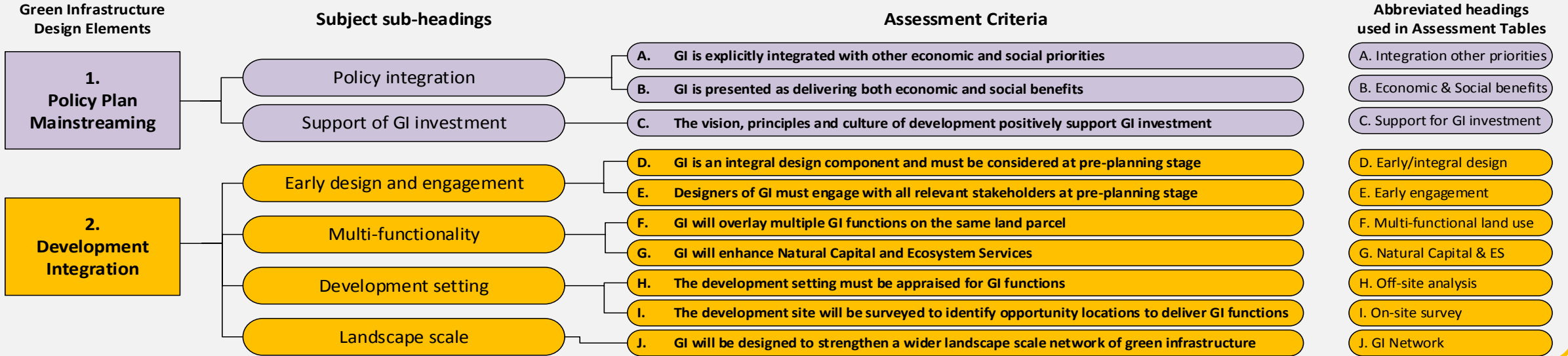


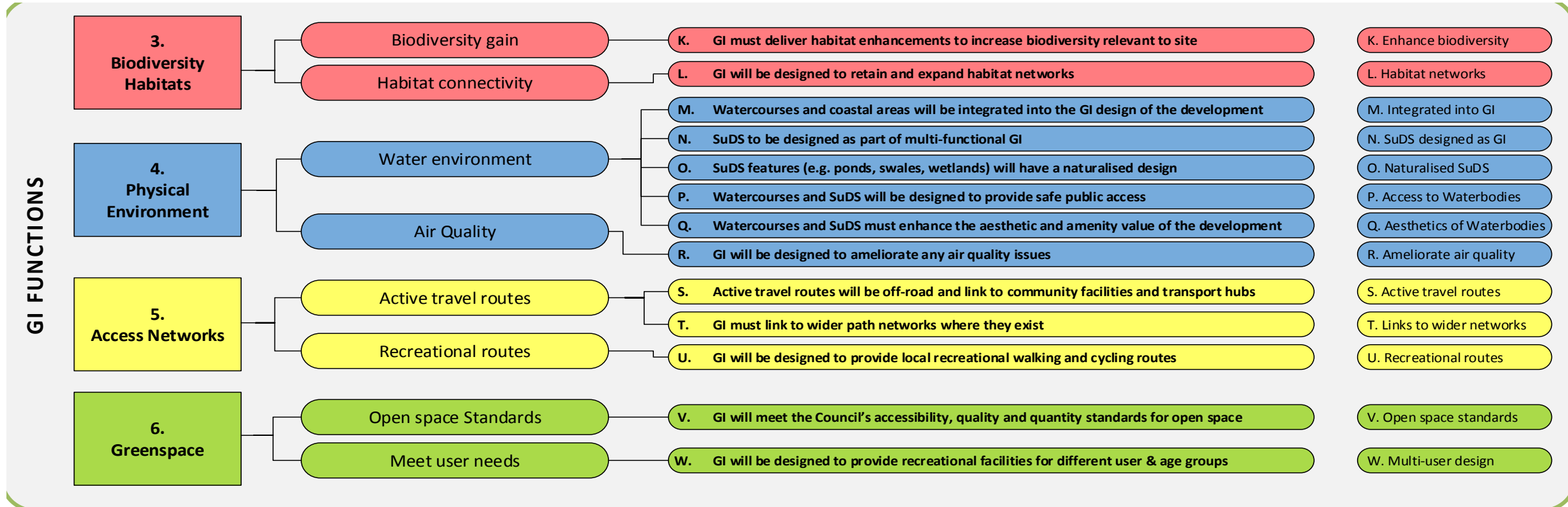
What does good GI policy look like? Creating a GI evaluation framework





GI INTEGRATION





AFTERCARE

7. Stewardship

Management & maintenance

Resourcing mechanisms

X. Long-term Management & maintenance arrangements will be documented & agreed

Y. Documentation will state the function of all GI components and the maintenance regime

Z. Mechanisms to fund the management & maintenance regime must be identified & agreed

X. Agreed management

Y. Functional maintenance

Z. Resourcing mechanisms

Methodology

- Word searches across NPPF on GI terms and concepts.
 - Eg GI , SuDs, Net gains, natural capital
- Each paragraph is then analysed with respect to criteria A-Z with scores given for

Coverage	None	Some	Most or dispersed	Full
Strength	None	Weak	Mid	Strong
Score	0	1	2	3

- The cumulative impact of the document is then revealed in a summary matrix revealing highest scores.

Trees Par 175

- 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





20 Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision....for green infrastructure, and

72 consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains

91 Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:for example through the provision of safe and accessible green infrastructure,

102 Transport issues should be considered from the earliest stages of plan-making and development proposals the environmental impacts of traffic and transport infrastructure can be identified

102 Transport issues should be considered from the earliest stages of plan-making and development proposals opportunities to promote walking, cycling and public transport use are identified and pursued;

118Planning policies and decisions should encourage multiple benefits... including through mixed use schemes and taking opportunities to achieve net environmental gains

150 New development should be planned for in ways that:creased vulnerability to the range of impacts arising from climate change....through suitable adaptation measures, including through the planning of green infrastructure;

165Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate

170 Planning policies and decisions should contribute to and enhance the natural and local environment by: minimising impacts on and providing net gains for biodiversity

171 Plans should take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

171 Plans shouldplan for the enhancement of natural capital

174 To protect and enhance biodiversity and geodiversity, plans should: identify and pursue opportunities for securing measurable net gains for biodiversity.

181 Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.

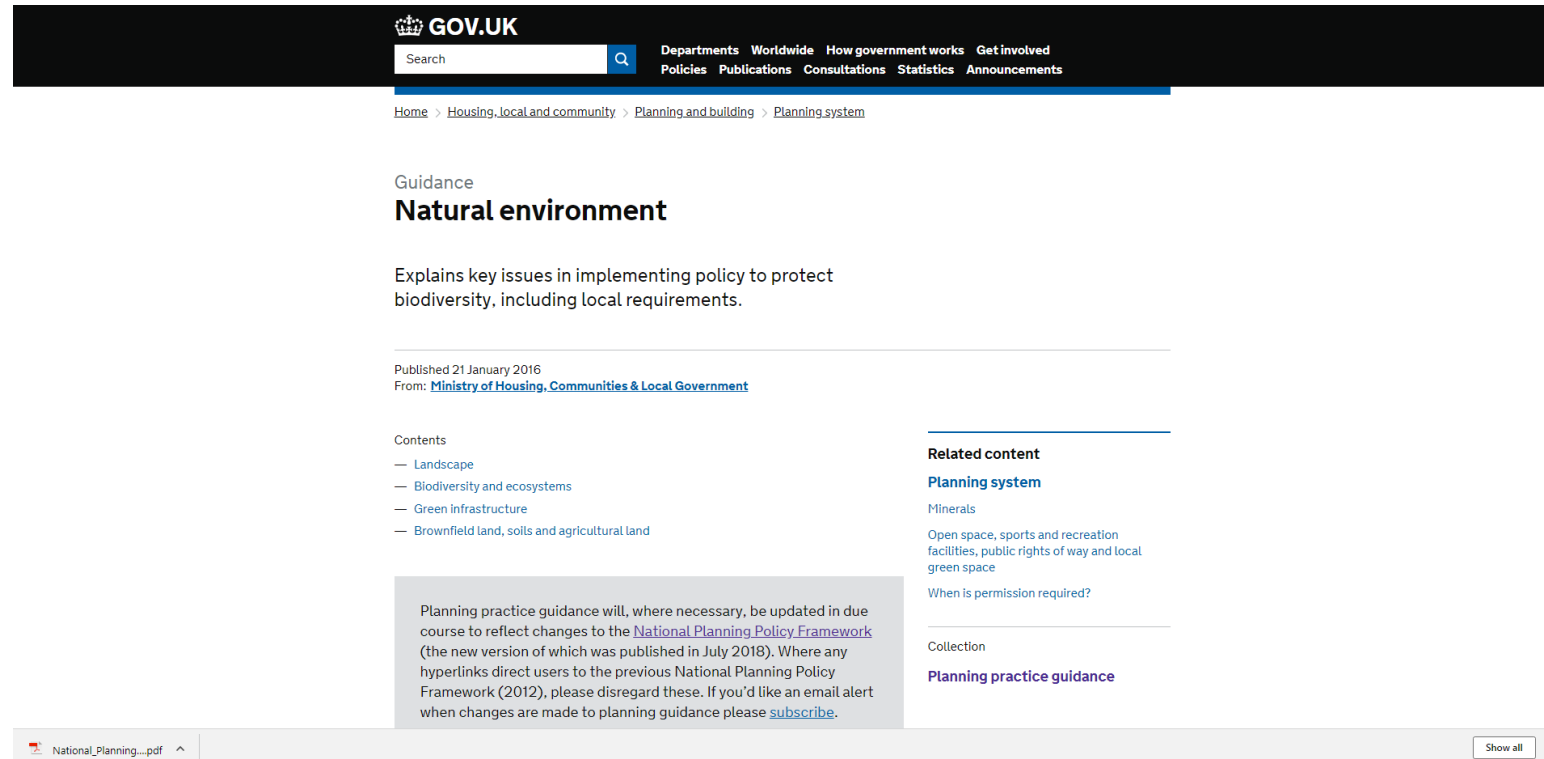
A Cheesy Evaluation

- Plenty of holes and gaps
 - Note stewardship and green space section devoid of any policy commitments
 - No maximum scores.
- Weak on aspects of integration through net environment gains and biodiversity BUT
 - No definitions in glossary however.
 - Real potential here + and -
- Policy wording
 - Poor scores on policy wording section
 - Role of should ?
 - Lots of grey scores creates vulnerability when set against other economic priorities.
 - Mainstreaming challenge.



Next Steps: NPPG

- Crucial role of NPPG and need for updating for natural environment 2016



The screenshot shows the GOV.UK website page for 'Natural environment' guidance. The page is titled 'Guidance Natural environment' and includes a search bar, navigation links, and a main text area. The main text area contains the following information:

Explains key issues in implementing policy to protect biodiversity, including local requirements.

Published 21 January 2016
From: [Ministry of Housing, Communities & Local Government](#)

Contents

- Landscape
- Biodiversity and ecosystems
- Green infrastructure
- Brownfield land, soils and agricultural land

Related content

- [Planning system](#)
- Minerals
- Open space, sports and recreation facilities, public rights of way and local green space
- When is permission required?

Collection

- [Planning practice guidance](#)

Planning practice guidance will, where necessary, be updated in due course to reflect changes to the [National Planning Policy Framework](#) (the new version of which was published in July 2018). Where any hyperlinks direct users to the previous National Planning Policy Framework (2012), please disregard these. If you'd like an email alert when changes are made to planning guidance please [subscribe](#).

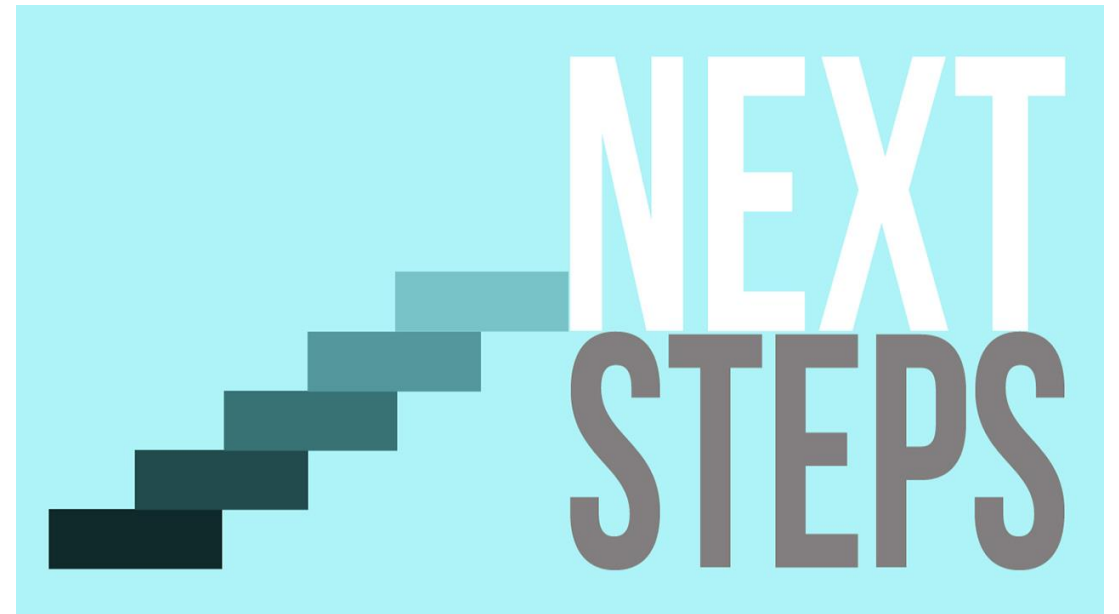
Next steps: Policy

- To pressure for new NPPG guidance and definitions of net environmental gain and net biodiversity gain.
- To embed 25 YEP into NPPF : create a level playing field with mandatory net gains.
- To use the hook of natural capital as a base to mainstream effective GI policy and practice.
- To use the GI standards as SPGs for new development (Building with nature) through all phases of development.
- To recognise the role of GI through all stages of development pipeline and not just at planning permission



Next Steps: Research

- To translate research showing multiple societal benefits of GI into action plans for delivery
- To develop standards and tools to help improved mainstreaming of GI through demonstration projects
- To prioritise the business case for GI to improve stewardship considerations.



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