

## **NWRA-Suggested amendments to Natural England's suggested Policy EM3 – Green Infrastructure**

The Assembly's suggested detailed amendments to the policy submitted by Natural England are given in Appendix 1 below. Deletions are shown in 'strikethrough' text and additions in bold and underlined text. An explanation of our suggested amendments is given below.

Firstly, it is considered that 'wider spatial outcomes' gives a more appropriate description than 'more sustainable outcomes' (first sentence)

The addition of 'secure' in relation to opportunities to delivery strengthens this policy framework (fourth bullet point in second section).

Changes in the 'priorities' section relate to securing green infrastructure considerations in new development and giving a stronger climate change proofing to the policy.

We suggest deleting the examples of area-based regeneration initiatives and major proposals and schemes. Identifying particular ones could have the effect of focusing effort and resources on those areas and schemes, and ignoring green infrastructure in other areas (second bullet from the end in the original 'Priorities' section).

We suggest deleting some elements of the original 'Priorities' section of the policy (including referring to actual priorities), and shifting the remaining bulleted points into the paragraph above. The deletion of general reference to 'priorities' is for the same reasons as above. The deletion of the original first bullet is for the reason that there is not currently a robust evidence base in place that supports priority of green infrastructure planning in the city regions. The Green Infrastructure Scoping Study for the East Midlands<sup>1</sup> does comment that there is a general trend that greenspaces in rural areas tend to have fewer multi-functional properties than those in urban contexts. However, for example, it can be said that it has an important role to play in the renaissance of rural communities and other planning activities.

It is thought that the requirement for local authorities to use existing delivery mechanisms first is a policy direction; therefore it is moved from the supporting text to the policy.

We suggest deleting elements of the supporting text that go into some depth to describe Green Infrastructure (see below), however we feel it is important to retain the aims and principles to help explain the concept and provide the regional strategic framework in which to plan for green infrastructure. The draft NW Green Infrastructure guide can perform the role of providing a detailed description and explanation of green infrastructure as well as further guidance on green infrastructure planning (this is referenced in the supporting text). We also suggest deletion of the principle of funding green infrastructure up-front as a 'primary public investment' as it is not entirely clear where this places green infrastructure planning in the hierarchy of public investment priorities. Also, we do not feel that it is the role of the RSS to prescribe this.

We feel that the essence of CPRE's submission is captured within the suggested changes.

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<sup>1</sup> Green Infrastructure Scoping Study for the East Midlands, TEP et al, 2005, paragraph 5.105

## **Appendix – NWRA suggested detailed amendments to Natural England’s suggested Policy EM3 and supporting text**

### **EM3 – Green Infrastructure**

Plans, strategies, proposals and schemes should aim to deliver ~~more sustainable~~ **wider spatial** outcomes that incorporate environmental and socio-economic benefits by:

- conserving and managing existing green infrastructure;
- creating new green infrastructure;
- enhancing its functionality, quality and connectivity.

~~In order to deliver more sustainable outcomes,~~ Local authorities and stakeholders should **work with partners to:**

- identify partnerships at an appropriate scale to take forward green infrastructure planning, in the context of relevant environmental and socio-economic objectives;
- use existing strategies and frameworks to develop consensus on green infrastructure priorities and associated data needs;
- set out the significant green infrastructure needs across the spectrum of economic, environmental and social objectives;
- identify **and secure** opportunities for delivery.

~~Priority should be given to:~~

- ~~the development and implementation of strategic green infrastructure plans in the City Regions of Liverpool, Manchester and Central Lancashire;~~
- ~~the integration of~~ **Integrate** proposals to improve green infrastructure in the delivery **of new developments, particularly through** of area-based regeneration initiatives and major proposals and schemes, ~~(e.g. urban regeneration initiatives, housing market renewal and Regional Parks);~~
- ~~maximising~~ the role of green infrastructure in ~~addressing regional~~ **mitigating and adapting to** climate change.

**Local delivery of green infrastructure plans should seek first to make use of existing delivery mechanisms supplemented by bespoke delivery mechanisms where necessary.**

### **NWRA - suggested supporting text to Policy EM3**

Green Infrastructure is defined as:

*~~The region’s life support system – The network of natural environmental components and green and blue spaces that lies within and between the North West’s cities, towns and villages and provides multiple social, economic and environmental benefits.~~*

The chief aims and principles that underpin the Green Infrastructure approach are:

*Aims:*

- identify the significant needs and opportunities (of a social, economic or environmental nature) in an area of search;

- assess if the green infrastructure components (individually and collectively) meet these needs, now and into the future;
- conserve those components which are essential parts of the green infrastructure.
- create brand new components where they can best meet local needs or fill gaps in the existing green infrastructure network;
- uplift **enhance** poorly-functioning green infrastructure to meet local needs or fill gaps;
- ~~target policies, resources and interventions to conserve, connect and re-build a healthy green infrastructure.~~

*Principles:*

- identify and protect green infrastructure before development;
- engage diverse people and organisations from a range of sectors;
- linkage is key, connecting green infrastructure components with each other and with people;
- design green infrastructure systems that function at different scales and across boundaries;
- green infrastructure activity must be grounded in good science and planning practice;
- ~~fund green infrastructure up-front as a primary public investment.~~
- emphasise green infrastructure benefits are afforded to all; to nature and to people;
- green infrastructure should be the framework for conservation.

~~In doing this, green infrastructure provides a wide range of benefits for the natural environment, for communities and for the economy. These include:~~

- ~~Improved quality of life.~~
- ~~Improved quality of place.~~
- ~~Enhanced economic regeneration.~~
- ~~Health and well being.~~
- ~~Improved opportunity for recreation and sport.~~
- ~~Climate change adaptation and impact management.~~
- ~~Water and flood management.~~
- ~~Air and noise pollution control.~~
- ~~Cultural heritage conservation.~~
- ~~Enhanced biodiversity.~~

The overall outcome of green infrastructure planning is the delivery of sustainable and multi-functional urban and rural landscapes. Green Infrastructure planning provides a means of spatially brigading guidance and strategy for the environment (ecology, landscape, heritage, access, and environmental management) and relating environment to broader social and economic strategy and forces for change. ~~The Green Infrastructure approach:~~

- ~~ensures that broader socio-economic objectives bring spatially appropriate environmental benefits;~~
- ~~develops natural environmental systems that contribute to providing for social and economic needs.~~

~~The process of green infrastructure planning involves five stages:~~

- ~~Step 1 — Partnerships and priorities.~~
- ~~Step 2 — Data audit and resource mapping.~~
- ~~Step 3 — Functionality assessment.~~
- ~~Step 4 — Needs assessment.~~

- ~~Step 5 – Intervention plan.~~

~~Green infrastructure differs from ecological frameworks in being a broader concept that integrates natural environmental systems with wider socio-economic needs. Ecological frameworks are therefore a component of green infrastructure systems. The development of ecological frameworks must underpin and inform the delivery of green infrastructure that helps provide functional ecological frameworks and other environmental goods and services (eg runoff control, adaptation to climate change etc).~~

~~The lack of an ecological framework might inhibit the establishment of a robust green infrastructure plan. Conversely, the spatial nature of ecological frameworks makes them very suitable for incorporation into the green infrastructure planning process and provides a potential avenue to support their delivery on the ground.~~

The NW Green Infrastructure Guide provides **further information on Green Infrastructure planning in the North West, including definition, guidance and good practice information.** ~~guidance and good practice information relating to these stages of green infrastructure planning in the NW region as a whole.~~

This policy should be read in conjunction with EM1, 2, 4 and 5, W4, L3, ~~RT2~~, DP1.