

# Cotswold District Local Plan 2018 – 2031 Update

## Town and Country Planning (Local Planning) Regulations 2012

### Regulation 18 “Issues and Options” consultation/participation

#### Evidence Paper: Green Infrastructure

##### 1. Introduction

- 1.1 Covering a wide variety of open spaces and green features, Green Infrastructure (GI) includes parks, playing fields, woodland, allotments and private gardens but can include sustainable drainage features (used to alleviate flooding and water pollution) urban planting, cycle tracks and Public Rights of Way as well as ‘blue’ features such as streams and other waterways. GI can be considered at a range of scales from major river estuaries to hedgerows.
- 1.2 GI can be defined as “*A network of multi-functional green space and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.*”<sup>1</sup>
- 1.3 GI is a key aspect of planning because of its ability to provide multifunctional benefits for people's wellbeing as well as for the natural environment. For example planting trees to provide natural shelter from the wind, sun and noise as well as the ability to absorb large amounts of rain water and “capture” carbon dioxide.
- 1.4 GI extends to a number of areas covered by other topic papers. The benefits of GI for design, including place making are covered by the Cotswold Design Guide topic paper. The benefits for people are covered in the Health and Wellbeing topic paper. GI is also an important aspect of the Transport topic paper, the Landscape Topic Paper as well as the Water Management Topic Paper.
- 1.5 There are various key green infrastructure assets in Cotswold District, including:
- [969 miles of Public Rights of Way](#), including the nationally acclaimed ‘Cotswold Way’ and ‘The Monarch Way’<sup>2</sup>
  - [Three Sustrans national cycling routes 45, 48 and 57](#)<sup>3</sup>
  - [The Thames and Severn Canal](#)<sup>4</sup>
  - [The Cotswold Water Park](#)<sup>5</sup>

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<sup>1</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>2</sup> <https://www.gloucestershire.gov.uk/prow/rights-of-way-online-map/>

<sup>3</sup> <https://www.sustrans.org.uk/national-cycle-network>

<sup>4</sup> <https://www.cotswoldcanals.org.uk/enjoying-the-canals/about-the-canals/the-thames-severn/>

<sup>5</sup> <https://www.cotswoldcanals.org.uk/enjoying-the-canals/about-the-canals/the-thames-severn/>

- Rivers and other watercourses such as the River Thames
- A number of recreational parks at various scales in size

1.6 A more comprehensive list of GI assets in the District can be found in the [Cotswold District draft GI Strategy](#)<sup>6</sup>

## 2. Objectives

2.1 Green Infrastructure is a key objective that contributes to delivering the adopted Local Plan's Vision and guide development throughout the District up to 2031.

*Objective: Natural & Historic Environment*

1. e. Support the creation of new green infrastructure to enhance environmental quality and provide health benefits.

2.2 It follows from this that GI forms the basis of Local Plan policy INF7 [Green Infrastructure](#):

1. *Development proposals must combine, depending on their scale, use and location, to the protection and enhancement of existing infrastructure and/or the delivery of new Green Infrastructure.*
2. *New Green Infrastructure provision will be expected to link to the wider Green Infrastructure network of the District and beyond.*
3. *Green Infrastructure will be designed in accordance with principles set out in the Cotswold Design Code.*

## 3. Current Local Plan Policy

3.1 The multifunctional or integrated benefits of GI are recognised in the following Local Plan policies

- Policy INF3 - Sustainable Transport
- Policy EN1 - Built, Natural and Historic Environment
- Policy EN3 - Local Green Spaces
- Policy EN8 - Biodiversity and Geodiversity: Features Habitats and Species

## 4. NPPF, NPPG and other material considerations

*National Planning Policy Framework (NPPF)*

4.1 The NPPF emphasises the strategic importance and cross-cutting nature of Green Infrastructure and its synergic benefits by referencing it in a range of policies, including:

- Chapter 3 - Plan Making - Strategic Policies
- Chapter 8 - Promoting Healthy and Safe Communities

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<sup>6</sup> <https://cotswold.maps.arcgis.com/apps/MapSeries/index.html?appid=dac1a6973d4e4e2caa6cb1f47b013171>

- Chapter 14 - Meeting the Challenge of Climate Change, flooding and coastal Change
  - Chapter 15 - Conserving and enhancing the Natural Environment
- 4.2 Among the issues to be drawn from the NPPF are references to GI and its strategic role in the overall quality, pattern and scale of development, including through mixed use development. The enhancement of GI and its role as a planning measure to address climate change, including mitigation and adaptation is emphasised - for example, the multiple benefits of undeveloped land for a variety of purposes including, flood risk mitigation, cooling/shading and carbon storage.
- 4.3 GI for its contribution to the health and well being agenda is noted. Infrastructure such as open spaces, sports facilities, access to healthier food and allotments as well as layouts of areas to encourage walking and cycling are mentioned. The health benefits of GI are extended to its ability to assist with air quality management and the opportunities there are for it to improve air quality or mitigate impacts from bad air quality.
- 4.4 Improving access to the countryside as well as opportunities for more recreation is also acknowledged. Public Rights of Way (PROW) and their importance for existing access as well as the possibilities to link them to national trails are mentioned.
- 4.5 A strategic and coordinated response to improvements across local authority boundaries is recommended.

*The 25 Year Environment Plan*

- 4.6 [The 25 Year Environment Plan](#) states that ‘the planning system can protect key natural and historic assets and encourage high-quality green infrastructure in urban areas’ (p. 35).<sup>7</sup>
- 4.7 The government makes the following commitments including:
- ‘Green’ our towns and cities by creating green infrastructure and planting one million urban trees; and
  - ‘more and better quality green infrastructure’; and the ‘creation of a set of standards in close consultation with stakeholders’.
- 4.8 The set of standards made reference to in the 25 Year Environment Plan (2018), above is expected to be published in Winter 21 by Natural England.

*The Environment Act 2021*

[The Environment Act](#)<sup>8</sup> is primarily concerns biodiversity, although there are obvious links to GI. Although the Environment Act is relevant, further detail is provided in the Biodiversity topic paper.

*Natural England’s Green Infrastructure Standards*

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<sup>7</sup> <https://www.gov.uk/government/publications/25-year-environment-plan>

<sup>8</sup> <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted>

4.9 It is anticipated that [Natural England](#)<sup>9</sup> will be publishing its Green Infrastructure Standards in Winter 2021 in collaboration with Public Health England (PHE) and other partners. This will form part of the government's development of a framework for green infrastructure standards aimed at helping to create and support a network of new and existing green spaces throughout urban areas. [In a blog by Natural England](#)<sup>10</sup>, It is anticipated that the GI Standards will include the following key points:

- having different types of green infrastructure close to people's homes, places of work or education, or along transportation routes, is likely to maximise the potential ways in which people benefit;
- both public green infrastructure, such as street trees, parks, and playgrounds and private ones such as gardens are important and support health in different ways;
- green infrastructure that is well looked after is more likely to be perceived as safe and inviting, and therefore used;
- a good understanding of the needs and desires of local communities will help ensure new or improved provision of green infrastructure is suitable; and
- care must be taken to understand the potential impacts of actions and to ensure that provision of green infrastructure is equitable, fair and does not increase inequalities in health between different social groups.

#### *The Gloucestershire Local Nature Partnership (LNP)*

4.10 Post adoption of its Local Plan in 2018 Cotswold District Council signed up to the Gloucestershire LNP's [GI pledge](#)<sup>11</sup>. The Pledge makes five key commitments. In doing so it makes reference to the NPPF and the 25 year Environment Plan and how working with partners can assist in a strategic approach to GI.

4.11 The LNP also prepared the [Strategic Framework for Green Infrastructure in Gloucestershire](#), which guided both the GI approach in the current local plan but also other local plans in the county. The Framework is currently being reviewed, to include more reference to natural capital and ecosystems services; the need for more large and small-scale publicly accessible green spaces; nature recovery and other recent initiatives. It is not anticipated that any of these changes will alter the fundamentals of the framework.

#### *Building with Nature*

4.12 [Building with Nature](#)<sup>12</sup> is a national benchmark that supports the delivery of high quality GI at all stages in the development process including policy, design, planning, implementation, construction and long-term management. The Benchmark breaks down GI using the key themes of Wellbeing, Water and Wildlife. By using these themes it is possible to identify the areas assets by each category. It also shows how each wellbeing, water and wildlife asset

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<sup>9</sup> <https://naturalengland.blog.gov.uk/2020/09/30/enhancing-englands-urban-green-spaces/>

<sup>10</sup> <https://naturalengland.blog.gov.uk/2020/09/30/enhancing-englands-urban-green-spaces/>

<sup>11</sup> <https://www.gloucestershirenature.org.uk/green-infrastructure-pledge>

<sup>12</sup> <https://www.buildingwithnature.org.uk/about>

benefits the other or has the potential to, and in doing so reinforces the multifunctional aspect of GI and the benefits it can create.

*Cotswold District Council Corporate Plan, Climate Change and Ecological Emergencies*

**4.13** Recently the Council declared a [Climate Change Emergency](#)<sup>13</sup> and in 2020 an [Ecological Emergency](#)<sup>14</sup>. The Council's Corporate strategy embeds both of these strategies at its heart, with a commitment to making the next version of the Local Plan Green to the Core. The Council's commitment to the Green Infrastructure strategy and the promotion and creation of new natural green spaces and green links across the District are expressed in The Ecological Emergency which undertakes to:

- d) Review the adopted Local Plan to ensure that the ecological emergency and nature recovery (including green infrastructure, ecosystems services and natural capital) are strategic priorities for planning and new development, through site allocations, policies and an up-dated Cotswold Design Guide.
- l) Provide advice for local communities on how to incorporate biodiversity, green infrastructure and natural capital (ecosystems services) into their neighbourhood plans and other initiatives.
- m) Progress the ongoing green infrastructure (GI) agenda including through completing the draft District GI strategy; ensuring the inclusion of high quality well-managed GI in new developments, the review of the Local Plan, advice on neighbourhood plans; input into the county GI strategy; continuing support for and collaboration with the national GI benchmark, Building with Nature (which was created in Gloucestershire with support from the Council).
- n) Promote the creation of new natural green spaces and green links across the District.
- q) Consider the implications for the Council of the Environment Act.

*Cotswold District Council Draft Green Infrastructure Strategy*

**4.14** The draft of the [Green Infrastructure Strategy](#) was consulted upon during the summer of 2021.

**4.15** Among the key findings of the strategy is that the District does not meet the current standard for accessible green spaces in nearly all of the 17 principal settlements identified in the Local Plan as well as at the broader district level. In light of the evidence a number of GI priorities have been prepared including: -

- Provision of accessible open space, including cycle/pedestrian links, play spaces and natural open space at both local and strategic scales (and the need to meet the ANGSt standards)
- Provision of high quality GI in new developments, including enhancement of existing GI.

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<sup>13</sup> <https://www.cotswold.gov.uk/environment/climate-action/cotswold-climate-and-ecological-emergencies/>

<sup>14</sup> <https://www.cotswold.gov.uk/environment/climate-action/cotswold-climate-and-ecological-emergencies/>

- Role of GI in climate change adaptation and mitigation via biodiversity connectivity and natural water management
  - The part GI has for health and wellbeing.
  - Ensuring that new and existing GI is managed correctly via management plans and agreements and through the use of the appropriate management organisations.
- 4.16** Some of the issues highlighted above touch on the role of GI in other topic areas:
- Transport - including cycle and pedestrian links
  - Design Code - high quality GI in new developments and enhancement to existing
  - Climate change - the role of GI in climate adaptation and mitigation
  - Water Management - the role of GI for water capture as a result of climate change events
  - Health and Wellbeing - the role of GI for both mental as well as physical health
- 4.17 Taken together these comprise the ten key GI issues that the Local Plan Update needs to engage with.

## 5. Potential Policy Responses

- 5.1 At a strategic level the relevant objective of the Local Plan needs to reflect the changes that are necessary.

*Local Plan Objective: Natural & Historic Environment*

- 5.2 To strengthen the resolve of the objective the following amendment, highlighted in **bold font**, is recommended.

Support the creation of new green infrastructure to enhance environmental quality and provide health benefits. **Secure the creation and enhancement, including retrofitting of new green infrastructure where feasible to enhance and support environmental improvements for wellbeing, water and wildlife.**

- 5.3 Having regard to the key changes identified and discussed above, the following points are recommended for consideration as part of the partial update of the Local Plan:
1. Include the necessary changes and updates from the NPPF:
  2. Update the policy to ensure that the Building with Nature Benchmark or equivalent, including the forthcoming Natural England GI standards are used and that the Wellbeing, Water and Wildlife benefits of Green Infrastructure are embedded in policy.
  3. Consider the implications of the Environment Act and how an update to policy can best take it into account.
  4. Ensure that the plan makes reference to the Green Infrastructure Strategy and the options and suggestions within it at both a settlement and district level as well as

taking into consideration the responses made to the public consultation. This should include the options for new accessible open spaces and the need for the long term management of those spaces.

5. Make sure the update pays due regard to the commitments made by CDC in relation to the Corporate Strategy as well as the Climate Change and Ecological Emergencies.
6. Make certain that the multi benefits of GI are incorporated into other policy areas as identified in the topic papers, including Biodiversity and Natural Capital.

<b>Policy Approach</b>	<b>Discussion of impacts, effectiveness etc - justification</b>
<p>(A) ii commit to preparing for inclusion in the next full review of the Local Plan all the updates highlighted by the review of the policy;</p> <p>(B) Update the existing Plan policies, having regard to the Local Plan Review; which will include a new policy and/or strengthen the existing one to address the updates in national guidance whilst taking into account and incorporating the actions put forward in the Ecological Emergency.</p>	<p>GI is an integral part of addressing many issues including climate change, the ecological emergency and health and wellbeing at both a national and local planning level. To not include updates regarding GI would leave the local plan unable to address these issues and the review would lead to a Local Plan that was not "green to the core".</p> <p>The Policy approach taken allows the updates to the NPPF, and implications and guidance from the 25 Year Environment Plan as well as the CDC Corporate Plan, Climate Change Emergency and Ecological Action plan to be taken into account. Of particular importance in these updates is the increased acknowledgement that GI provides multiple benefits for planning, people's lives and the environment, including; health and wellbeing, climate change, flooding and pollution.</p> <p>The findings of the CDC GI strategy can be taken into account and the evidence gained by the strategy can shape the policies of the update. This includes the need and possible call for new open spaces and a country park and their proper long term management. Making sure new development is guided by the Building with Nature Benchmark. It will also ensure that space standards, including those for play areas, allotments, sports and woodlands are continued to be applied along with new, forthcoming standards such as the Natural England GI standard are reflected in the update.</p> <p>The Environment Act has implications for the update and clarifies how the multiple benefits of GI are to be applied across the environmental remit, including BNG and Natural Capital.</p>
<p>(C) Rejected Option:</p>	<p>To do nothing This is always an option in any situation. In this case it is unacceptable.</p>



	<p>The Local Plan review has identified that policy amendments together with a new policy are needed in order to reflect changes at a national and local policy level .</p>
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