

## **FoBRA comments on the B&NES draft Green Infrastructure Strategy**

FoBRA is very encouraged to see that the Council is making good progress with the issue of “Green Infrastructure”. Green Infrastructure (GI) has, in our view, been a missing element in planning policy, or at least an insufficiently developed one, for a considerable period of time.

In general, we believe that the draft achieves a good high level description of the nature and goals of GI. However, we feel that it lacks certain elements of detail which are essential even in a strategic document if it is to be of practical use.

### **Status of the document**

We note that the Strategy is listed on the Local Development Framework (LDF) page of the Council's website and that reference to this is made on page 9 of the draft.

However, we believe it to be essential that the precise status of the Strategy be clarified. Is it indeed a formal Local Development Document? If so, is it a Development Plan Document or a Supplementary Planning Document? What weight is it to have in development control decisions? How is this to be balanced, in principle, against the weight given to other documents, such as the World Heritage Site Management Plan, or the Mendip Hills Area of Outstanding Natural Beauty Management Plan? This is a general concern, but we also pick it up in relation to particular parts of the text in our more detailed comments below.

### **Key issues in relation to the City of Bath and the World Heritage Site**

GI is a key issue in the city of Bath, and the draft does not handle it properly, since it takes too restricted a view of what constitutes the setting of the City and its buildings.

Historic buildings are protected by the listing process, and Bath contains twice as many as other historic cities such as York. However, listing protects only a building itself and its curtilage, but Georgian architecture achieves its effect not through individual buildings alone, but by combining relatively high-rise (and dense) residential development with an intensive GI setting in terms of parks, gardens and vistas. The WHS designation makes it a top priority to protect and enhance this in terms not just of the immediate settings of listed buildings but in terms of long-range views within, into and out of the WHS: this may mean protection from development, arboriculture and other management action, and in certain cases the restoration of open space. The GI strategy should elaborate as a key objective how this essential aspect of GI will be protected in development control decisions.

The Strategy should make clear how the Council are taking sufficient care to bring to bear on the GI Strategy:

- (i) The WHS Management Plan,
- (ii) The World Heritage Site Steering Group, and
- (iii) The emerging World Heritage Setting Supplementary Planning Document (which is not yet available but is essential in terms of UNESCO's 'Operational Guidelines for the Implementation of the World Heritage Convention' (2008), and is intended to be based on the Bath World Heritage Site Setting Study produced to inform the Examination in Public of the policies and options in the Core Strategy).

All these will be important levers to ensure that the necessary improvements to policy are made. Other important issues relating to the City of Bath are picked up in comments below on the text of the draft.

## **Relationships**

We also believe that more detailed cross-references would be helpful to the reader. For example, reference is made on page 6 to the Council having worked with the other West of England local authorities to develop a GI Framework for the West of England area, although no reference to a resulting document is given. Equally, reference is made on page 4 to "healthy ecosystems that provide many essential natural services including clean water and air"; this seems, unobtrusively, to be a reference to the 2011 Selborne report (the *UK National Ecosystem Assessment*), and, if so, this should be acknowledged, along with the fact that the ecosystem services described in Selborne run a good deal wider than this description, including for example biodiversity and landscape.

## **Local Green Space**

§§73-78 of the NPPF introduces a new concept of Local Green Space and stresses its importance: "Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them" &c. B&NES needs to take into account that in urban areas where there is little room for new development such as Bath there may be little need for neighbourhood plans, so that it will be very important for the LDF processes to make other provision to identify Local Green Space; this document would be a suitable place in which to announce the procedures which the Council will follow for this purpose.

In particular, it will be vital for B&NES to make it easy for local communities to put forward green areas of importance to them for designation in the Allocations ("place-making") DPD as Local Green Space. They should publish a simple form for community groups to fill in and submit for this purpose, emphasising that it can be used not just for open spaces within their area but also for GI, which, though sited outside their area, is visible from it and contributes to its amenity.

## **Comments on the text**

Aims of the Strategy are set out in section 3 on page 7. These are a mixture. Some, for example to "gain endorsement and buy in by all organisations involved" or "research existing and new delivery mechanisms", are part of the Council's own activity plan. Others, for example "provide an agreed understanding of green infrastructure", or "facilitate enhancements to see green infrastructure network" are effectively part of the development plan, and are expected to guide development control decisions. These two kinds of things need to be separated out. It is essential that in the conflict-laden and litigious world of planning, everyone involved is clear about what is to be a material consideration in planning decisions and what is not.

On pages 11 and 12 it is correctly noted that research has shown strong positive links between health and levels of contact with the natural environment. We believe that the

strategy should draw the conclusion that the protection and enhancement of GI should be accorded an even higher priority in development control decisions in the vicinity of hospitals and nursing homes.

On pages 12 and 13 references are made to the policy, already (and in our view correctly) adopted by the Council, that growth should be steered to brownfield land in urban areas. There is an opportunity here to make the point that the benefits from GI can be harmed not only by development on green areas, but by excessive traffic which impairs the enjoyment of them, and that it is therefore important that development not only avoids greenfield land, but is carried out in ways which will not lead to a demand for highway improvements which themselves will inhibit the benefits to be obtained from the GI.

On pages 13 and 14 there is important material on tourism and the wider economy.

- (i) Placing a figure on the value of the tourism-related economy, both across the whole authority and within the city of Bath, would contextualise this section better, and illustrate its importance more clearly.
- (ii) The reference to the contribution of tourism to the economy of the city of Bath at the top of page 14 is in our view incomplete, for reasons we return to below.
- (iii) We have observed a tendency for local business representatives in Bath to focus on parking restrictions and traffic congestion as the main planning issues of concern to them, yet it has been plain to us that a key factor in attracting them to locate in the city is its heritage environment and GI. There is an opportunity here to declare an intention to engage in dialogue with business interests on planning issues so as to ensure that the value they place on GI is properly represented in planning policies.

Page 16 sets out well the main areas of importance within the Council's boundaries in relation to GI. One designation which is missing here is green belt, and we note in particular the importance of the Englishcombe Valley, and the outstanding panorama visible from the chapel of rest at the Bath crematorium.

The material on biodiversity on pages 17-21 is very helpful. We think, however, that it would be important to take more explicit account of the Management Plans of the Mendip Hills and Cotswolds Areas of Outstanding Natural Beauty. In addition, the position in relation to Local Nature Partnerships and Nature Improvement Areas is evolving very rapidly at present, so the final document should take full account both of the then current position, and of any expectations for further change. Recent work, including the Selborne report, has shown that previous ideas of the utility of narrow wildlife corridors have been mistaken, and that a landscape scale approach is often needed: this was picked up in the Environment White Paper, and a number of references are made to it on page 19 of the draft, although some of the specific proposals (such as those relating to the Wansdyke or to the Clutton-Whitchurch corridor) do not seem to have been fully adjusted to the new understanding.

The section on ecosystem services on pages 21-23 provides an opportunity to insert material on air pollution. As you will be aware, the council is currently in breach of European directive requirements relating to air pollution in a number of parts of Bath,

mainly as a result of vehicle emissions; indeed, there is a good case to argue that, if readings were adjusted for technical difficulties in measurement, then the true position would be found to be even worse. FoBRA recognises the difficulties which the Council has in this area, but we feel that it would not be right for a document of this sort to go forward without acknowledging the unsatisfactory current position and giving an undertaking that the Council will use its best endeavours to ameliorate the situation.

The reference to National Character Areas on page 23 should once again refer to the Cotswolds Area of Outstanding Natural Beauty Management Plan.

On page 24, there is a proofreading error in the second reference to SUDS (and also in the box at the end of the section), which ought to be corrected before the document is finalised. However, the substance of the water management passage is excellent, and of course its inclusion is very important in relation to the Bath area.

Pages 25 and 26 contain helpful material on recreation and open space. One point which could beneficially be included would be to point out that increasing the formalisation of open space is likely to diminish its benefits – for example, replacing an ancient hedgerow with a fence will diminish biodiversity, the opportunity for wildlife movement, and people's enjoyment of nature; replacing a playing field with allotments will diminish access to green land and also aesthetic benefits. The gradual change in the status of schools, with local authority maintained schools becoming independent academies, will make it all more important that school playing fields are fully protected from the temptation on governors to dispose of them for housing in the face of financial pressures, to which small organisations are inevitably more vulnerable than large.

The delivery objectives in section 7 are very helpful, but once again do not distinguish clearly enough between those which are intended as material considerations in development control decisions on the one hand, and those which are intended as goals for council activity on the other. They need to be examined carefully and sorted out in this respect; we should be happy to help in this process if required.

The text on mapping in section 8 is useful. It might be worth considering whether it should be extended to cover mapping of the noise envelope surrounding major traffic routes, and perhaps areas enjoying night sky darkness which ought to be preserved as part of the GI exercise.

Section 10 deals with implementation. There is a need here once more to distinguish between that action which is part of the development plan process and that which is not. It would be helpful to specify what, if any, particular additional documents will form part of the LDF as this work is taken forward, together with the Council's current expectations of their timing.

Lastly, page 44 covers funding, and mentions Community Infrastructure Levy and Section 106. It appears to us that these will be critically important elements of the funding requirement, and that it would be very helpful to say a bit more about the policies and processes affecting how much of this funding it will be possible to make available, and in what timescales.

FoBRA, 24<sup>th</sup> May 12