Welsh Government's Green Infrastructure Guidance: Position Statement

CIEEM Wales Policy Group
August 2019

THE CHARTERED INSTITUTE OF ECOLOGY AND ENVIRONMENTAL MANAGEMENT (CIEEM) IS THE PROFESSIONAL BODY FOR ECOLOGISTS AND ENVIRONMENTAL MANAGERS WORKING TO MANAGE AND ENHANCE THE NATURAL ENVIRONMENT IN THE UK AND IRELAND. THIS BRIEFING NOTE HAS BEEN COMPILED BY MEMBERS OF THE CIEEM WALES POLICY GROUP.

1. Introduction

In December 2018, Edition 10 of Planning Policy Wales (PPW)[1] was published, setting out a new strategy for the delivery of development and planning decisions within Wales. Embedded within the document are principles enshrined within the Well-being of Future Generations Act (2015)[2], which places a legal obligation on statutory authorities to promote delivery of sustainable development, i.e. development that improves the social, economic, environmental and cultural well-being of Wales. In particular, PPW 10 places new emphasis on delivering multi-functional benefits within development through the provision of integrated green infrastructure. Following publication of PPW 10, Welsh Government intends to prepare guidance on green infrastructure and its delivery within the planning system.

2. Our Position and Recommendations

CIEEM's Wales Policy Working Group welcomes the proposals for further guidance aimed at developers and local planning authorities with regards to the implementation of green infrastructure within development and decision-making processes and sees this as an opportunity to refine the principles adopted within the revised PPW.

We would, however, encourage inclusion of the following:

1. Detailed definition of the term 'green infrastructure'. 'Green infrastructure' can be perceived as an ambiguous term, open to interpretation by different bodies and/or individuals. Any guidance should, therefore, provide detailed definitions of the term and meaning to ensure consistent understanding and interpretation within the planning system, and thus a

consistent approach to implementation across administrative boundaries.

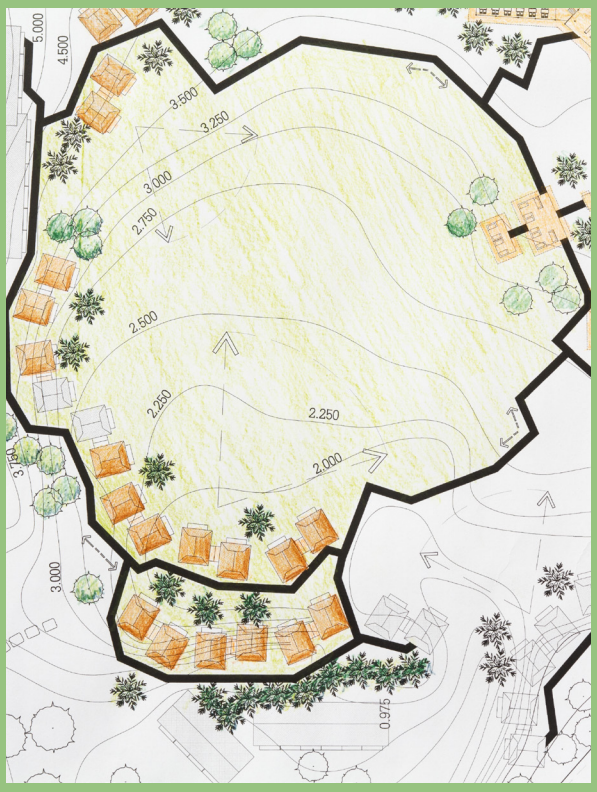
2. Greater emphasis on the multi-functional benefits that can be delivered through green infrastructure within a development, including the positive impacts on health and well-being of a community. This may include reference to specific features and habitats not typically considered within a masterplan design. For example, allotments and orchards provide benefits for the health and well-being of a community, whilst also providing a positive contribution to biodiversity.

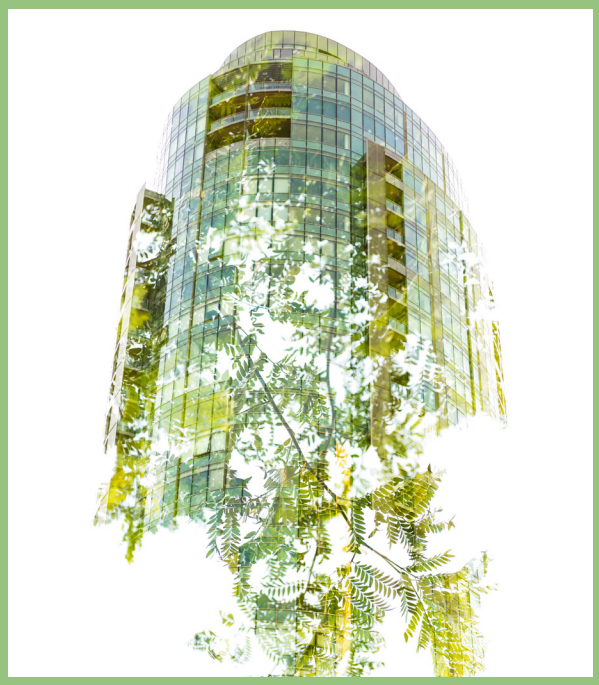
3. Greater emphasis should be placed on the benefits of early engagement with qualified practitioners to identify environmental opportunities and constraints on-site, thus allowing appropriate green infrastructure proposals to be built into an emerging masterplan at the onset of the development design process.

4. Reference to the Mitigation Hierarchy and CIEEM's Biodiversity Net Gain Good Practice Principles for Development[3]. Principle 1 (Apply the Mitigation Hierarchy) states "*do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision-makers where possible, compensate for losses that cannot be avoided. If compensating for losses within the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere*". Principle 2 (Avoid losing biodiversity that cannot be offset by gains elsewhere) states "*avoid impacts on irreplaceable biodiversity - these impacts cannot be offset to achieve No Net Loss or Net Gain*".

5. Increased emphasis on the responsibilities of developers and Local Planning Authorities (LPAs) ensuring that 'blue infrastructure' (i.e. rivers, lakes and ponds) is also a key consideration within the masterplanning process, since such features may also provide opportunities for biodiversity and ecosystem services.

6. Greater emphasis on the benefits of combining green and blue infrastructure strategies as part





of a holistic masterplan, which is aligned with new drainage legislation[4] that came into force in January 2019. This requires the implementation of Sustainable Drainage Systems (SuDS) within all new developments of more than one dwelling or where the construction footprint exceeds 100m^2.

7. Opportunities arising from new and refurbished 'grey infrastructure' (i.e. landscaping associated with roads and railways) should also be considered in terms of how they can further enhance local green and blue infrastructure, for example, this will be important when refurbishing disused railway tracks, which may have developed locally important habitats.

8. Details of the mechanism for screening and scoping when a Green Infrastructure Statement is required for a specific development site, recognising that minor developments may have a limited impact upon green infrastructure. In this instance, a Green Infrastructure Statement should be prepared only where considered appropriate, and any green infrastructure provision should be proportionate to the scale of development and associated impacts.

9. Consideration of potential conflicting uses or needs within a masterplan design, particularly where a development is constrained by size and, therefore, opportunities for inclusion of a holistic green infrastructure strategy. It must be recognised that there will be occasions where it is not appropriate or possible to deliver all benefits of green infrastructure. For example, in cases when the statutory requirement for provision of SuDS may conflict with a requirement to provide mitigation or habitat compensation for protected habitats and species. In this instance, guidance should allow for a pragmatic solution to environmental constraints.

10. Any guidance must be consistent with existing development plan policies and national policy guidance, and also be adaptable to evolving planning policy and legislation. This should allow green infrastructure to deliver long-term benefits to development design rather than being a hindrance to conflicting policy and legislation. Greater clarification on how this will be achieved is required.

11. Finally, the delivery of an integrated system delivering multi-functional benefits requires a planning team with a multi-disciplinary skill set and sufficient

understanding and expertise of all the various facets of sustainable development. We would, therefore, consider it beneficial to roll-out future guidance in tandem with further training, for example through workshops with LPAs, master planners and developers, to support implementation of key concepts.

It is our hope that these comments be considered and constructively incorporated into emerging guidance for green infrastructure, which should provide support to LPAs and developers who implement green infrastructure within planning proposals and the decision-making process.

References

1. Welsh Government (2018) *Planning Policy Wales: Edition 10,* Cardiff: Welsh Government. Available at: https://gov.wales/sites/default/files/publications/2018-12/planning-policy-wales-edition-10.pdf (Accessed: 28/08/2019).

2. *Well-being of Future Generations Act 2015*, Wales. Available at: http://www.legislation.gov.uk/anaw/2015/2/contents (Accessed: 28/08/2019)

3. CIRIA, CIEEM, IEMA (2016) *Biodiversity Net Gain: Good practice principles for development*. Available at: https://cieem.net/resource/biodiversity-netgain-good-practice-principles-fordevelopment/ (accessed: 27/08/2019)

4. *Flood and Water Management Act 2010, Schedule 3*, Wales. Available at: https://www.legislation.gov.uk/ukpga/2010/29/schedule/3 (Accessed: 28/08/2019).

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