



## **Natural England's Position on Housing Growth and Green Infrastructure**

### **Issues**

The Government is seeking an additional 3 million homes by 2020 and has pledged that at least 60% of these will be built on brownfield land, leaving a substantial amount to be provided elsewhere. While we have not endorsed these figures, we consider that such an expansion of house building would have significant implications for the natural environment. Our position is based on there being a demonstrated need for growth.

We support the Government's emphasis both on urban regeneration and on the creation of new sustainable communities that incorporate all the services and facilities required by a community.

This is a big agenda, some of which is outwith our specific expertise so we will concentrate our engagement on the broad *location* of new housing and the *nature* of new development.

We need two types of position statement to guide our work on housing growth and green infrastructure. *Firstly*, we are adopting an overarching position for the topic; and *secondly*, we propose specific policies on sustainable location, environmental capacity, environmental quality and green infrastructure. These are set out below and further developed in Annex 1.

### **Positions**

#### **Our overarching position on housing growth**

Natural England believes:

**Necessary housing growth should be accommodated with minimum impact on the natural environment and deliver maximum benefits for the natural environment and people together.**

We support the plan-led approach to housing growth and will use our role as a statutory consultee on spatial plans and development proposals to deliver our position.

#### **1: Sustainable location: The most environmentally sustainable locations should be found for new housing development.**

Major development should avoid environmental assets such as protected landscapes, habitats, sites, species and floodplains, and should promote sustainable travel patterns. Policies and decisions on development proposals should conserve valued environmental assets by seeking first to avoid loss or harm, before considering the need for mitigation or compensatory measures. Where development takes place in areas which currently have a low environmental value, we would expect the development to enhance environmental value as well as provide new housing.

All potential options should be considered in the search for the most sustainable locations to meet the country's long-term development needs. This includes maximising the use of brownfield sites (recognising that some are of high environmental and social value). Whilst we support the valuable urban containment role played by the Green Belt and believe this should continue, a strategic review of Green Belt boundaries should form an integral part of the regional appraisal of future development options. In particular, we believe it is time for a refresh of Green Belt policy to see if and how it might evolve to fit twenty first century circumstances and deliver more positive benefits for the natural environment and people's enjoyment of it.

## **Evidence**

Government planning policy<sup>1</sup> emphasises the protection and enhancement of the natural environment as a key role for the planning system, and the planning system has generally worked well to protect England's finest environmental assets. Natural England will continue to use its role as a statutory consultee on spatial plans and many development proposals to ensure that development avoids harm to all environmental assets. Evidence will be needed on the detailed operation of Green Belt policy and the condition of Green Belt land in order to develop our thinking on the Green Belt.

## **2: Environmental capacity: An assessment of environmental capacity should be central to decisions on future development.**

The capacity of the environment to accommodate development will vary from place to place and we believe that the search for the most environmentally sustainable locations for future development should be based on a thorough understanding of environmental capacity and the cumulative impacts of development. Environmental capacity should be considered in the round for the whole country, for the region, sub-region and at local level. Development should enhance the environmental capacity of an area.

## **Evidence**

Natural England is undertaking work on the cumulative impacts of development. Broader work on environmental capacity is being developed by regional bodies in several regions to inform regional spatial strategies. Defra is also exploring, with partners including Natural England, the concepts of environmental limits and ecosystem services. Specific Natural England Targets are likely to explore further how these related concepts can work together to develop an approach to underpin spatial planning decisions.

## **3. Environmental quality: The environmental quality of all new housing development should be substantially improved.**

All new development should create high quality, locally distinctive places where people want to live and work. Development should also deliver significant benefits for the natural environment, including environmental enhancement and climate change mitigation and adaptation measures, as well as provision for recreation and access. New development should be resource efficient, using the latest technological solutions. The statutory requirements for Growth Areas, Growth Points and Eco-towns should incorporate stringent environmental standards so that they become genuine exemplars of environmentally sustainable development.

<sup>1</sup> As set out in particular in *Planning Policy Statement 1: Delivering Sustainable Development* (2005), *Planning Policy Statement 7: Sustainable Development in Rural Areas* (2004) and *Planning Policy Statement 9: Biodiversity and Geological Conservation* (2005).

## **Evidence**

Much new housing development is of mediocre quality. In response, Government is increasingly placing the emphasis on improving the quality of new housing development . Natural England is also working with key partners in the Growth Areas, Growth Points and proposed Eco-towns to help develop exemplars to show what can be done in order to help improve the quality of new development everywhere.

### **4. Green infrastructure: The provision of green infrastructure should be an integral part of the creation of sustainable communities throughout England.**

Networks of multi-functional greenspace providing a wide range of environmental and quality of life benefits should be identified in regional and local plans and designed into all major new development and regeneration schemes from the outset. The valuable contribution of private gardens to green infrastructure should also be recognised. Government should make provision for substantial new funding for the creation and long-term maintenance of extensive green infrastructure, including through the proposed Community Infrastructure Levy. A definition and key principles of green infrastructure are attached at Annex 2.

## **Evidence**

Green infrastructure is increasingly recognised as an essential component of any truly sustainable development and the most effective means of providing a wide range of ecosystem services, quality of life and health benefits. The importance of green infrastructure was confirmed by the Royal Commission on Environmental Pollution's 2007 report on the Urban Environment.

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## **Annex 1: An associated programme**

To complement our policy on housing growth and green infrastructure, we plan to take forward work in the following areas:

- Developing Natural England's overarching policy on spatial planning (of which housing and green infrastructure are a component) and transport policy.
- Developing our policies in the following areas- Community Infrastructure Levy and Planning Obligations, Brownfield Land and Buildings, Settlements and Landscapes.
- Producing technical guidance for staff on what we want to see in Regional Spatial Strategies and Local Development Frameworks and a refresh of the joint statutory bodies' publication *Environmental Quality in Spatial Planning*.
- Developing our thinking and evidence base on environmental capacity, eco-system services and the cumulative impacts of development, including the funding and other mechanisms needed to take these concepts forward.
- Green Belt- developing the evidence base relating to the condition of Green Belt land, progressing a "Greening the Green Belt" initiative to improve the environmental quality of the Green Belt and pressing Government for a refresh of Green Belt policy.
- Green infrastructure- continuing to influence the development of Green Infrastructure Strategies for the Growth Areas and Growth Points, setting environmental standards for Growth Points and Eco-towns, producing a detailed green infrastructure 'vision statement' and good practice guidance, helping to develop master plans and influencing exemplar developments.

## **Annex 2: Green Infrastructure**

### **Natural England's definition of Green Infrastructure**

*Green Infrastructure (GI) is a strategically planned and delivered network comprising the broadest range of high quality green spaces and other environmental features. It should be designed and managed as a multi-functional resource capable of delivering those ecological services and quality of life benefits required by the communities it serves and needed to underpin sustainability. Its design and management should also respect and enhance the character and distinctiveness of an area with regard to habitats and landscape types.*

*Green Infrastructure includes established green spaces and new sites and should thread through and surround the built environment and connect the urban area to its wider rural hinterland. Consequently, it needs to be delivered at all spatial scales – regional, sub-regional, local and neighbourhood levels, accommodating both accessible natural green spaces within local communities and often much larger sites in the urban fringe and wider countryside.*

### **Key Principles for Green Infrastructure**

Natural England believes that Green Infrastructure should:

- be delivered via a co-ordinated network that provides the broadest range of ecosystem services and environmentally based social benefits. These include embedding wildlife rich and varied habitats in urban and rural areas, providing recreational spaces (with consequent health benefits), supporting education and providing climate change adaptation measures;
- emphasise the 'multifunctionality' of the green network as a whole and, as appropriate, of individual sites;
- be delivered by co-ordinated planning, delivery and management across local authority departments and boundaries and across different sectors;
- seek physical and functional connectivity between sites at all levels and right across a town, city or sub-region, shaped by local character and distinctiveness in terms of species, habitats, landscape and townscape;
- incorporate all the green spaces of a town or city, both public spaces and private gardens, and connect with the wider countryside;
- involve local communities in the design and management of greenspace;
- be delivered primarily through focussed Green Infrastructure (GI) strategies and the spatial planning system of Regional Spatial Strategies and Local Development Frameworks;
- provide a strategic framework for identifying and protecting those brownfield sites that represent important habitats or very valuable social spaces;
- be established as a permanent resource with financial support for its continued maintenance and adaptation.