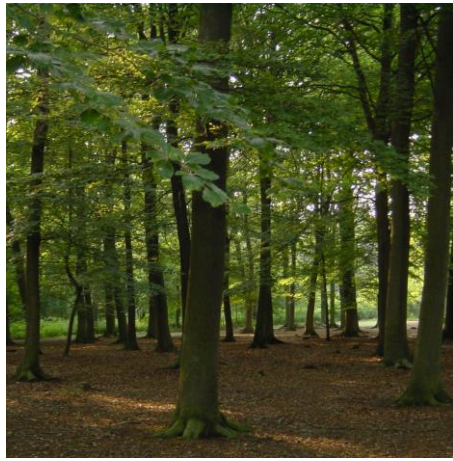


# Local Plan for Pendle

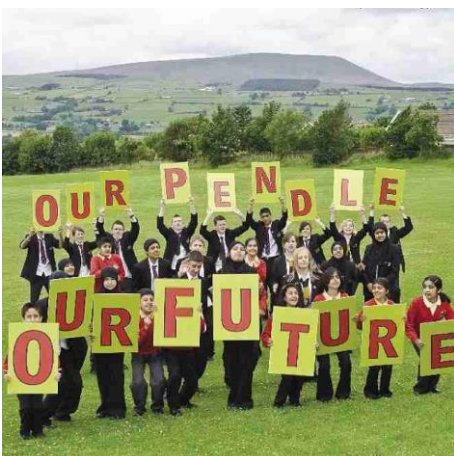
## Evidence Base



## Pendle Green Infrastructure Strategy



## Scoping Report



# Pendle Green Infrastructure Strategy Scoping Report

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# Pendle Green Infrastructure Strategy Scoping Report

## 1. Introduction

- 1.1 This scoping report sets out the parameters for the Pendle Green Infrastructure (GI) Strategy. It outlines the various stages that are required to collect the evidence necessary to assess the green infrastructure assets of the borough. This information will be used to help develop a strategy for managing and improving existing assets; increasing the level of provision to address identified deficiencies or needs; and developing a network of multi-functional spaces which will deliver ecosystem services.

## 2. Background

- 2.1 Pendle Council has previously adopted a number of documents that consider the provision of open space, parks, sports and recreation, and biodiversity in the Borough. Table 1 provides a summary of these documents:

**Table 1: Current Strategies**

Document	Year	Status
Pendle Open Space Audit	2008	The Pendle Open Space Audit was last updated in 2008. To ensure the Local Plan is based on robust and up-to-date evidence it now needs to be reviewed. Open space is a significant element in any Green Infrastructure network and it is important to have accurate records on its provision.
Outdoor Recreation Strategy 2003-2008	2006	Now replaced by the Playing Pitch Strategy.
Parks Strategy 2007-2017	2007	This Strategy will end in 2017. With the transfer of services to parish councils a different approach to the provision and development of parks will be needed. As such the Park Strategy will not be updated. However, details of parks etc will be an important consideration in the open space audit element of the GI work.
Children and Youth Play Area Strategy 2006-2016	2006	This Strategy has now ended. With the transfer of facilities to parish councils a different approach to the development of new facilities will be needed. As such the Children and Youth Play Area Strategy will not be updated. However, details of play areas etc will be an important consideration in the open space audit element of the GI work.
Biodiversity Audit	2010	Provides information relating to the biodiversity assets of the borough and provides links to a number of datasets.
Playing Pitch Strategy	2016	This new strategy in part replaces the Outdoor Recreation Strategy. It was prepared jointly with Burnley and Rossendale Councils. This strategy provides the evidence relating to outdoor sports provision, need and demand and will be used in conjunction with the GI Strategy to provide evidence for the Local Plan.
Review of Indoor Sports Facilities	2017	This report provides details of the provision and needs for indoor sports facilities in Pendle. It will complement the playing pitch strategy and help to provide the evidence relating to the needs and demands for sport and recreation.

# Pendle Green Infrastructure Strategy Scoping Report

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- 2.2 The contents of a number of these documents now need to be reviewed and updated. It is proposed that the GI Strategy will bring together information from these documents in order to take a more integrated and strategic approach to the provision and management of green space in Pendle. In particular the new GI Strategy will help to identify the inter-relationships between the different types of spaces and the multi-functionality<sup>1</sup> of those spaces.
- 2.3 The Council has recently embarked on a programme of transferring services to parish councils including a number of parks and play facilities. This will have implications in terms of taking forward a strategy for the provision and management of these assets.

## 3. Evidence requirements

- 3.1 The requirement to provide evidence on green infrastructure is established in the National Planning Policy Framework (NPPF). Chapter 8: Promoting healthy communities and Chapter 11: Conserving and enhancing the natural environment both address aspects of green infrastructure and the need to collect data regarding its provision.
- 3.2 Paragraph 73 relates to the provision and need for open space and states that *“planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.”*
- 3.3 Paragraph 114 relates to the natural environment and states that *“Local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.”*<sup>2</sup>
- 3.4 The purpose of preparing a GI Strategy is to bring together evidence on open space, sport and recreation, and biodiversity; to better understand how they relate to one another. In turn, this will help to formulate new planning policies which will seek to protect, manage, enhance and where appropriate connect sites together. The work will identify the different typologies of green infrastructure and include an audit of sites. This information will provide the evidence to help show where there are gaps in provision which can then be addressed by the strategy and new planning policy.
- 3.5 The GI Strategy will form an important part of the evidence base for the new Pendle Local Plan. It will be used to inform planning decisions on the provision, improvement and loss of open space relating to new development. Other bodies and organisations such as Parish Councils will be able to use it to help inform their work on Neighbourhood Plans etc.

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<sup>1</sup> Natural England states that ‘Multifunctionality’ is central to the green infrastructure concept and approach. It refers to the potential for green infrastructure to have a range of functions, to deliver a broad range of ecosystem services. Multifunctionality can apply to individual sites and routes, but it is when the sites and links are taken together that we achieve a fully multifunctional green infrastructure network.

<sup>2</sup> It should be noted that ecological networks and Green Infrastructure are defined separately and are not the same thing. However, they are not mutually exclusive and there is normally considerable overlap between the two.

## 4. Guidance

- 4.1 A number of organisations have provided guidance on preparing open space, green infrastructure and biodiversity strategies. It is useful to review this guidance in order to help set the parameters for the Pendle GI Strategy and to identify best practice. A short precis of the key guidance is provided below.
- 4.2 Two sections of the National Planning Practice Guidance (NPPG) provide information on green infrastructure. The section on the Natural Environment covers the topics of biodiversity, ecosystems and green infrastructure. It provides details of the evidence required to identify and map ecological networks. It also provides a definition of green infrastructure and suggests the use of Natural England's guidance on planning positively for networks of biodiversity and green infrastructure.
- 4.3 The section on Open Space, Sport and Recreation also covers Public Rights of Way and Local Green Spaces. Specifically it provides details of how open space should be taken into account in planning. It suggests the use of Sport England's guidance on assessing the needs and opportunities for indoor and outdoor sport facilities.
- 4.4 CABE's Best Practice Guidance on Open Space Strategies indicates that *"the basic aim is to understand supply and demand for open spaces, to identify deficiencies, to secure new provision, and to improve quality through better management."*
- 4.5 Sport England's guide focuses on assessing the needs for formal sport and recreation activities and the sports facilities to meet these needs. However, it does not consider how to assess play, informal activities and wider open space needs.
- 4.6 The Town and Country Planning Association together with the Wildlife Trusts have produced good practice guidance for green infrastructure and biodiversity. This document emphasises the need to gather appropriate evidence as it *"will help to inform decisions on the type and location of green space required to complement existing GI, fill gaps, mitigate adverse impacts, and provide additional compensatory measures to ensure a net gain in biodiversity assets and GI. It is good practice to carry out context studies to establish where existing or potential GI exists."*
- 4.7 Natural England's Green Infrastructure Guide provides help on how to prepare GI Strategies. It defines the functions of GI, explains the concept of multi-functionality, the benefits that GI can bring to a community and the value of planning for GI. The Accessible Natural Green Space Standards (ANGSt) are also a useful starting point for considering how to assess current levels of access to greenspace and how access can be improved.
- 4.8 The guidance outlined above has helped to establish the stages which need to be carried out to prepare a robust Green Infrastructure Strategy for Pendle.

## 5. Steering Group

- 5.1 The guidance suggests that one of the first steps should be to establish a steering group. The participants should come from a broad range of organisations to ensure that all interests are represented.
- 5.2 The steering group will help to provide direction and focus to the project and its members will provide essential input regarding the scope and content of the strategy. An initial steering group meeting was held in February 2016 and was attended by a number of key stakeholders. These are listed in Appendix 1 and will be consulted during the preparation of the GI Strategy.
- 5.3 At the initial steering group meeting attendees received a short presentation outlining the purpose and aims of the GI Strategy. They were also given an early draft of the Scoping Report for comment. Based on the feedback received this final version of the Scoping Report has been prepared. Appendix 2 sets out the comments received from group members together with a response from council officers indicating how each comment has been taken into account.
- 5.4 Further meetings of the Steering Group will be held, if considered necessary, but the members of the group will be fully involved in the preparation of the GI Strategy as it progresses.

## 6. Vision, Aims and Objectives

- 6.1 As a starting point this scoping report provides a definition of green infrastructure and sets out the Vision, Aims and Objectives for the emerging strategy.

### Definition

- 6.2 It is important to define what is meant by green infrastructure, as it means different things to different people. The NPPF and NPPG provide the following definition: *“A network of multifunctional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.”*
- 6.3 The NPPG supplements this definition with some additional details: *“Green infrastructure is not simply an alternative description for conventional open space. As a network it includes parks, open spaces, playing fields, woodlands, but also street trees, allotments and private gardens. It can also include streams, canals and other water bodies and features such as green roofs and walls.”*
- 6.4 Together these provide the overall definition of green infrastructure for the Pendle GI Strategy. It will be supplemented with details of the different green infrastructure typologies outlined in the Methodology Report.



# Pendle Green Infrastructure Strategy Scoping Report

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## Vision

6.5 In Pendle the vision for green infrastructure is that it will:

***“be a network of multi-functional green spaces, watercourses and connections across the borough. These spaces will be protected and enhanced for the benefit of the community and natural environment. Provision of green infrastructure will help to deliver a broad range of ecosystem services, help to adapt to climate change and ensure that new development is sustainable.”***

6.6 This vision will be supported by the aims and objectives of the strategy.

## Aims

6.7 The main aim of the work is to prepare a strategy which can be used to help support the protection, enhancement and provision of green infrastructure in the Pendle.

6.8 The wider aims of the strategy, which stem from this include:

- promoting more active lifestyles thereby improving people’s health and well being;
- providing places for outdoor recreation and play;
- creating, maintaining and improving wildlife habitats and giving people access to nature;
- helping to mitigate the effects of climate change, making the area more resilient;
- providing a network of multi-functional spaces which allow for the movement of people and wildlife, including the establishment of an ecological network;
- creating attractive environments for people to live and work;
- preserving landscape character.

## Objectives

6.9 In order to realise the vision and aims, the strategy will support the achievement of the following objectives:

- Provide a clear definition of Green Infrastructure (GI).
- Identify a set of GI typologies incorporating those used in the Open Space Audit.
- Carry out a review of the existing Open Space Audit.
- Identify the wider GI assets of Pendle.
- Assess the GI provision in Pendle looking at typology and function.
- Set local standards for the quantity, quality and accessibility of GI sites.
- Determine if there are any surpluses (areas where the recommended amount of open space is more than the standard) or deficiencies in GI provision.
- Identify sites for enhancement and improvement.
- Identify opportunities for the creation of new spaces for sport, recreation and habitats, taking account of proposed development locations, landscape character and ecological sites and networks.
- Identify opportunities to make connections between spaces, where appropriate, to form a cohesive network of GI, addressing cross boundary connections.
- Identify how the above elements contribute to/form part of the ecological networks identified by LERN/LCC.
- Identify the wider benefits of GI provision including flood alleviation and protection, and where possible identify those sites which provide these wider benefits.

## 7. Work Stages

7.1 The strategy will be developed in accordance with the work stages outlined below:

### **Stage 1: Scoping and Context**

- Review the national, sub-regional and local context.
- Establish a Steering Group for ongoing consultation.
- Identify the purpose of the study – outline the different priorities for improving the delivery of green infrastructure (e.g. sport, recreation, biodiversity, visual amenity, health etc).
- Define green infrastructure and its different functions, showing how ecological networks and ecosystem services are associated with green infrastructure provision.
- Agree on the vision, aims and objectives outlined in this scoping report and set the parameters of the study.

### **Stage 2: Methodology and Site Survey**

- Prepare the methodology for site surveys
- Establish a database/spreadsheet for GI sites (including a review of the existing open space database).
- Review the existing site appraisal and scoring criteria.
- Carry out an audit of sites:
  - Map sites on GIS
  - Determine typology / functions of each site
  - Carry out on-site survey work recording the key features and quality of each site

### **Stage 3: Assessment**

- Carry out an assessment of the sites based on the survey findings
- Identify a network(s) of spaces.
- Set out the current demographic position and identify future trends
- Determine the amount of GI space per area by typology and the amount per person

### **Stage 4: Standards and Provision**

- Use the demographic data and site assessments to determine standards for the quantity, quality and accessibility of GI space.
- Use these standards to identify any surpluses (i.e. amounts of GI space above the recommended standard) or deficiencies of GI space.
- Identify gaps in the existing supply, areas to be protected/improved and opportunities for the provision of new sites and connections (e.g. help to maintain, strengthen or establish wildlife corridors/ecological networks).
- Prepare a local network map of ecological sites<sup>3</sup>.

### **Stage 5: Strategy**

- Collate and report on the findings.
- Prepare the draft strategy and action plan.
- Consult on the findings of the survey work, draft strategy and action plan.
- Refine strategy and action plan based on consultation responses.
- Adopt strategy.

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<sup>3</sup> LERN (Lancashire Ecological Records Network) has prepared a number of ecological network maps for different habitat types e.g. Grassland, Woodland, and Wetland and Heath (draft).



# Pendle Green Infrastructure Strategy Scoping Report

## 8. Timetable

8.1 The following draft timetable provides an indication of the timescales for carrying out the work:

	2017/18																			
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug
<b>Stage 1: Scoping and Context</b>																				
• Review context, identify purpose and define GI and its functions.	█																			
• Establish Steering Group and hold initial meeting.	█																			
• Agree Vision, Aims, Objectives, Outcomes.	█																			
<b>Stage 2: Methodology and Site Survey</b>																				
• Prepare the methodology for site surveys	█	█	█																	
• Establish a spreadsheet for GI sites and review the existing site appraisal and scoring criteria						█	█													
• Carry out an audit of sites						█	█	█												
<b>Stage 3: Assessment</b>																				
• Carry out an assessment of the sites and identify the network of spaces								█	█	█	█									
• Identify the current demographic position and future trends								█												
<b>Stage 4: Standards and Provision</b>																				
• Determine standards for quantity, quality and accessibility													█							
• Identify any surpluses (areas where the recommended amount of open space is more than the standard) or deficiencies of GI space													█	█						
• Identify gaps, areas to be protected and opportunities for the provision of new space and connections													█	█						
• Prepare a network map of ecological sites													█	█						
<b>Stage 5: Strategy</b>																				
• Prepare draft strategy and action plan																█	█			
• Consult on findings of the survey work, strategy and action plan																		█	█	
• Refine strategy and action plan based on consultation responses																			█	
• Adopt strategy.																				█

## 9. Strategy Report Contents

9.1 The strategy report will follow the structure outlined below:

### **A. Introduction**

1. Background
2. Policy context
3. Development context
4. Vision, Aims and Objectives

### **B. Evidence**

1. Steering group and public consultation
2. Data collection methodology
3. Survey and data collection
4. Results summary
5. Assessment

### **C. Strategy**

1. Benefits of GI
2. Opportunities
3. Policy recommendations
4. Action plan
5. Delivery mechanisms

# Pendle Green Infrastructure Strategy Scoping Report

## Appendix 1 – Key Stakeholders

Organisation	Contact / Representative	Position
Bradford Metropolitan District Council	Andrew Marshall	Group Planning Manager
Burnley Borough Council	Mark Mullaney	Senior Planning Officer
Calderdale Metropolitan Borough Council	Philip Ratcliffe	Planning Policy Manager
Campaign for the Protection of Rural England (CPRE)	Jackie Copley	Planning Officer
Canal & River Trust	Martyn Coy	Area Planner
Craven District Council	Sian Watson	Spatial Planning Manager
Earby & Salterforth Drainage Board	Ralph Guy	Chairman
East Lancashire Ornithologists Club	John Plackett	-
Environment Agency – NE		
Environment Agency – NW	Liz Locke	Planning Advisor – Sustainable Places Team
Forest of Bowland AONB	Elliott Lorimer	Principal AONB Officer
Friends of Parks and RAGE	Alison Plackett	-
Lancashire County Council (Ecology)	Nik Bruce	Development Officer
Lancashire County Council (Highways)	Neil Stevens	Team Manager - Transport & Development
Lancashire Wildlife Trust	John Lamb	Senior Conservation Officer
Local Nature Partnership – Lancashire	Tim Mitcham	Head of Conservation
Local Nature Partnership – South Pennines	Robin Gray	Project Manager
Local Nature Reserves	David Penney	-
National Trust	Alan Hubbard	Land Use Planning Adviser
Natural England	Martin Moss	Senior Advisor (Green Infrastructure Operations England)
Network Rail	-	-
North Yorkshire County Council	Rachel Wigginton	Senior Policy Officer
PBC – Neighbourhood Services	Tom Partridge	Countryside Access Officer
Pendle Council – Neighbourhood Services	Kieron Roberts	Green Spaces Manager
Pendle Council – Planning (Conservation)	Lee Johnson	Environmental Officer
Pendle Council – Planning (Policy)	John Halton	Principal Planning Officer
Pendle Council – Planning (Policy)	Jonathan Dicken	Senior Planning Officer

## Pendle Green Infrastructure Strategy Scoping Report

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Organisation	Contact / Representative	Position
Pendle Leisure Trust	Alison Goode	Executive Manager for Development and Operations
Pennine Prospects	Robin Gray	Project Manager
Ramblers Association	Mark Chung	Pendle Footpath Officer
Ribble Life	Jack Spees	Trust Director
Ribble Valley Borough Council	Colin Hirst	Head of Regeneration & Housing
RSPB	Jeremy Sutton	Conservation Officer
Sport England	Fiona Pudge	Planning Manager
United Utilities	David Sherratt	Local Development Framework Assessor
Woodland Trust	Richard O'Callaghan	Regional External Affairs Officer
Yorkshire Water	Stephanie Walden	Planning Manager

# Pendle Green Infrastructure Strategy Scoping Report

## Appendix 2 – Responses to the consultation on the draft Scoping Report

Steering Group Meeting – Stakeholder Feedback on the draft Scoping Report

Stakeholder	Comment	Officer Response
<b>Q1. Have you any general comments on the draft Scoping Report?</b>		
Fiona Pudge Planning Manager Sport England	I've had a look at the Scope of the GI Project and the only thing missing is reference to the emerging Playing Pitch Strategy (PPS). Kieron Roberts is leading on the PPS and I've copied him in so he is aware I've passed on my comments. The PPS will be a useful source of information and sets out a site by site action plan within the strategy which the GI strategy should take into consideration.	A reference to the Playing Pitch Strategy will be included in the Scoping Report. The findings from this strategy will be fully considered in the preparation of the GI Strategy.
Tom Partridge Countryside Access Officer Pendle Borough Council	Scoping report should also refer to the Countryside Access Strategy.	Reference will be made to Countryside Access and its relation to Green Infrastructure in the Strategy Report. In particular, consideration will be given to the important contribution that public rights of way (PROW) make to Green Infrastructure and their role of giving people access to the countryside and wider natural environment.
Jack Spees CEO Ribble Rivers Trust	Clear definition of exactly what GI will be – there is inference of what it is but you need to be clear such that nothing is missed in terms of importance.	A definition of GI will be included in the Scoping Report to clarify exactly what will be addressed by the Strategy, but the different GI typologies will be set out in more detail in the Methodology Report.
Robin Gray Development Manager Pennine Prospects South Pennines Local Nature Partnership	Green Infrastructure has an ability to address surface water flooding (i.e. liaison with the lead Local Flood Authority) - a 'management train' for SUDS (sustainable urban drainage scheme) – of surface water control can provide multiple benefits (ecological networks, amenity).	Reference will be made to the wider benefits of GI, including its ability to help reduce surface water flooding. However, the scope of the study is such that it will not include any empirical research into this issue.

## Pendle Green Infrastructure Strategy Scoping Report

Stakeholder	Comment	Officer Response
<p>John Lamb Senior Conservation Officer Wildlife Trust for Lancashire, Manchester &amp; N. Merseyside</p>	<p>Is the GI Strategy for Forward Planning/Development Control in Pendle Council, or is it for the council as a whole, including all relevant departments, Parish and Town Councils etc? Hopefully it is for the latter, but perhaps it should be stated?</p>	<p>The GI Strategy will be put forward for adoption by the Council and other departments will be able to use it in their work where necessary. However, its main purpose is to provide evidence to help inform decisions on the allocation of land for development in the new Local Plan and for use by Development Management officers when making decisions on planning applications. Reference will be made in the Scoping Report to the key reasons for preparing the strategy.</p>
<p>Kieron Roberts Green Spaces Development Officer Pendle Borough Council</p>	<p>In the Background section it mentions the Strategies we have in place and then states that these documents need to be reviewed and updated. In terms of the Outdoor Recreation Strategy, we are doing this in the guise of the Playing Pitch Strategy that should be completed by mid-2016. The Children's &amp; Youth Play Area Strategy isn't relevant now and ceases to exist this year anyway. We have no intention to update this due to the Transfer of play facilities to Town/Parish Councils. 47 are being transferred from the 1st April 2016 and the ones in Parks will go within next couple of years. Again, the Parks Strategy finishes next year and there are no plans to update due to the same reasons given regarding the play facilities across the borough.</p> <p>I mentioned it at the meeting the other week – the transfer of services to Parish/Town Councils. This will have significant implications in terms of this Strategy. PBC will in approx. 3-4 years not manage Parks, Sports Pitches, Play Facilities, misc. green spaces, etc. these</p>	<p>Reference to the various strategies was made to give some context and background to the GI Strategy preparation. This section will be amended to reflect the current status of these strategies and any future intentions.</p> <p>The transfer of services/assets to the Parish/Town Councils will be referenced and taken into account when considering how new facilities and spaces will be procured and managed through the development process. This is an important change to take account of when preparing new planning policy for the provision and maintenance of open space.</p>



## Pendle Green Infrastructure Strategy Scoping Report

Stakeholder	Comment	Officer Response
	will be under the control of respective Town/Parish Councils. I would hope that the Town/Parish Councils sign up to the Strategy's recommendations /strategic way forward set out in the final document.	
Mark Chung Pendle & Burnley Ramblers Footpath Officer Rambler Association	Looks good to me.	Comments noted.
David Penney Chairman Friends of Greenfield LNR Executive Committee Member Pendle LNR Steering Group	The development of Pendle Green Infrastructure Strategy should take into account the following resource documents: 1) Duties under Section 40 of the NERC Act 2006 2) Policies and commitments in Biodiversity 2020 3) Town & Country Planning Association and Wildlife Trusts good practice guidance for Green Infrastructure and Biodiversity – in particular with reference to section 3: 10 principles of planning for Green Infrastructure & Biodiversity 4) Localism Act 2011 – involving community in developing comprehensive and holistic infrastructure strategy	The legislative context will frame the preparation of the GI Strategy and the requirements set out in the four documents identified will be taken into account.
Dave Hortin Planning Technical Specialist Environment Agency	We would like to see the objectives make reference to flood alleviation and protection. The aims include helping to mitigate the effects of climate change but we do not feel that this has been fully developed in the objectives. Climate change will lead to increased risk of flooding and green infrastructure provides a means of helping to manage the effects.	Stronger reference will be made to climate change resilience, which is widely acknowledged to be one of the benefits of GI provision. Its role in flood alleviation and protection will be referenced along with the other wider benefits of GI.
Mark Mullany Senior Planner Burnley Borough Council	As with our Strategy, the project looks ambitious being broad in scope and including updates of existing evidence in addition to GI analysis and Strategy. So	It is acknowledged that the scope of the Strategy is quite broad. Following the Steering Group meeting and discussions with partners (such as Natural

## Pendle Green Infrastructure Strategy Scoping Report

Stakeholder	Comment	Officer Response
	<p>especially important to be clear at outset about and not lose sight of what you want to have from the Strategy at the end.</p>	<p>England), it is clear that the Scoping Report needs to be amended to focus more clearly on the outcomes the Council is wanting to achieve from the study.</p>
<p>Dr John and Mrs Alison Plackett</p>	<p>The draft scoping report was written before the new Planning Practice Guide (PPG) for the National Environment – Green Infrastructure was published separately from Biodiversity and Ecosystems. Perhaps it would be timely to review and align Pendle’s Scoping Report to develop and deliver a strategic approach to</p> <ul style="list-style-type: none"> <li>*protecting and improving the natural environment</li> <li>*networks of biodiversity</li> </ul> <p>Networks of GI.</p> <p>With separation of the PPGs for GI and for Biodiversity and Ecosystems, it may be advisable to develop separate outcomes as planning policies should conform with NPPF 114 and 117.</p> <p>It should be noted that GI networks are for delivering a wide range of environmental and quality of life benefits for local communities (See NPPF Glossary and PPS12 paragraph 2.6).</p> <p>Ecological networks link sites of biodiversity importance, whether statutorily designated or not, for their intrinsic value (see NPPF Glossary and PPS12 paragraph 2.6).</p> <p>Communication from the DCLG confirms that networks of GI should be planned or as separate entities from ecological networks. However it should be possible and advantageous to run a parallel process in order to correlate development of the respective strategies.</p>	<p>It is acknowledged that the NPPG provides separate guidance relating to Biodiversity and Ecosystems, and Green Infrastructure, however, they are both considered under the broader heading of the Natural Environment.</p> <p>The NPPG indicates that GI provides multiple benefits, notably ecosystem services. Therefore although there is a difference between GI and ecosystems / ecological networks there is also a great deal of cross-over as certain sites perform both functions.</p> <p>For the purposes of the GI Strategy the focus will be on the identification of GI networks. Reference will be made to how they can perform multiple functions including their important contribution to the ecological networks in the borough.</p> <p>Two ecological networks have already been identified by LERN (LCC), with a third in draft form. The work carried out to identify these networks will be used in the preparation of the GI Strategy to help identify the location and function of sites. The NPPG indicates that high quality networks of multifunctional green infrastructure provide a range of ecosystem services and can make a significant contribution to halting the decline in biodiversity. It will be important to bring the evidence on ecological networks together with the</p>

## Pendle Green Infrastructure Strategy Scoping Report

Stakeholder	Comment	Officer Response
<p>David Cockburn-Price Chairman of the Steering Group East Colne and Villages Neighbourhood Plan</p>	<p>The framework seems sensible. As one of the borough's best assets is its landscape and heritage, it is important to protect and enhance it so it is sustainable for the future. Additional reference needs to be made of its value beyond the community to tourists/visitors.</p> <p>I am assuming aspects such as nature reserves and woodland, which are under-resourced in the borough, will form part of the GI review.</p>	<p>evidence on GI.</p> <p>The wider benefits of GI will be set out in the GI Strategy report.</p> <p>Nature reserves and woodland are key GI assets and will be fully considered in the preparation of the GI Strategy.</p>
<b>Q2. Have you any comments on the proposed vision?</b>		
<p>Tom Partridge Countryside Access Officer Pendle Borough Council</p>	<p>No.</p>	<p>N/A</p>
<p>Jack Spees CEO Ribble Rivers Trust</p>	<p>Throw in the "creation and investment in Natural Capital to derive ecosystem services".</p>	<p>Reference is already made within the Scoping Report to the importance of GI delivering ecosystem services.</p>
<p>John Lamb Senior Conservation Officer Wildlife Trust for Lancashire, Manchester &amp; N. Merseyside</p>	<p>It encompasses GI, networks, biodiversity, community and ecosystem services in one succinct paragraph – so well done.</p> <p>Perhaps these elements need to be defined/differentiated clearly – maybe in a 'Definitions' section?</p>	<p>A glossary of terms / definitions / abbreviations will be included in the Strategy Report.</p>
<p>Mark Chung Pendle &amp; Burnley Ramblers Footpath Officer Rambler Association</p>	<p>No further comments at this time.</p>	<p>N/A</p>

## Pendle Green Infrastructure Strategy Scoping Report

Stakeholder	Comment	Officer Response
David Penney Chairman Friends of Greenfield LNR Executive Committee Member Pendle LNR Steering Group	Emphasis should be made on values and purpose: Under S40 of NERC Act 2006 “every public authority must have regard to the purpose of conserving biodiversity” (1) and “in relation to living organisms and habitat, restoring or enhancing a population or habitat” (3)	The Vision explains that GI assets will be protected and enhanced for the benefit of the natural environment. This covers the points made in the NERC Act.
Dave Hortin Planning Technical Specialist Environment Agency	No.	N/A
Mark Mullany Senior Planner Burnley Borough Council	Perhaps the Vision should focus on the specific GI benefits/outcomes which Pendle will enjoy (linked to various GI functions). Current Vision is ‘jargon heavy with ‘green infrastructure’ ‘multifunctional’ and ‘ecosystem services’ in one sentence!	The terms used in the Vision are those used in national policy and guidance and have been reiterated in the Vision for consistency. The report already lists the proposed outcomes of the strategy, however, these will be refined / amended as necessary following the Steering Group meeting and will be made clearer / less jargon heavy wherever possible.
Dr John and Mrs Alison Plackett	For GI the Vision is well-expressed, but as GI has a specific definition in the NPPF Glossary, references to ‘biodiversity’ should perhaps read ‘the environment’.	The NPPF refers to a range of environmental and quality of life benefits in its definition of GI. The Vision in the Scoping Report currently refers to “for the benefit of the community and biodiversity...”. In order to ensure consistency with the NPPF the reference to “biodiversity” in the Vision will be replaced with “the natural environment” which in this context will cover issues relating to biodiversity.
David Cockburn-Price Chairman of the Steering Group East Colne and Villages Neighbourhood Plan	It seems like a good opener. Given the planning focus on sustainability, this word/sentiment should be included. I suggest “...protected and enhanced for the sustainable benefit of the community and biodiversity...”	The vision will be revised to include reference to how GI provision can help to ensure that new development is sustainable.

## Pendle Green Infrastructure Strategy Scoping Report

Stakeholder	Comment	Officer Response
<b>Q3. What do you want to see included in the Green Infrastructure Strategy?</b>		
Tom Partridge Countryside Access Officer Pendle Borough Council	Protection of the rights of way network as a network of green routes. Therefore when land is being developed rights of way should not be used as access roads or left as narrow ginnels. Instead they should be left as wide landscape areas / multifunctional spaces which people can enjoy, as well as going from A to B. In addition such routes should be created when development is carried out to link into existing networks.	Local Plan Part 2 will include a policy on green infrastructure, which will address Public Rights of Way (PROW) and in particular how they should be incorporated and protected in new development.  In terms of the GI Strategy, reference will be made to PROW in the context of accessible routes and spaces.
Jack Spees CEO Ribble Rivers Trust	Ecosystem service mapping to aid in prioritising the focus on sites and types of Green Infrastructure.	Where available, consideration will be given to using such mapping to inform the GI Strategy.
Robin Gray Development Manager Pennine Prospects South Pennines Local Nature Partnership	See previous notes. Links to Sustainable Urban Drainage Links to Pollinator Strategy LERN corridors	Reference will be made to the wider benefits of GI, including its ability to help reduce surface water flooding. Sustainable Urban Drainage Systems will be referenced as a potential GI asset. However, the scope of the study is such that it will not include any empirical research into this issue.  If appropriate, reference to the Pollinator Strategy will be made. However, the scope of the study is focussed on the identification of sites which form GI, an integral part of the GI network and potential gaps between them. Although it is recognised that the flora and pollinating insects present at these sites are important the GI strategy will not be considering their role in that level of detail.
John Lamb Senior Conservation Officer Wildlife Trust for Lancashire, Manchester	1. Clarification of GI, ecological networks, biodiversity and ecosystem services and what the Strategy can and cannot do.	1. The revised scoping report aims to provide clear outcomes of what the strategy will cover. This will include the definition of key terms as appropriate.

## Pendle Green Infrastructure Strategy Scoping Report

Stakeholder	Comment	Officer Response
& N. Merseyside	<p>2. Cross-boundary issues and sites (ecological networks are a good example).</p> <p>3. Resilience of people/communities and biodiversity to climate change.</p> <p>4. An open space audit to include Natural England's Accessible Natural Greenspace Standards (ANGSt).</p> <p>5. Reference to relevant principles, policies and legislation including the NERC Act 2006, Lawton Review 2010, Biodiversity 20:20, NPPF 2012, Sustainable Drainage Systems (SuDS), Buglife's 'B-lines' (which have been mapped in Lancashire) and the government's pollinator strategy. I find the diagram in the Lawton Review very useful.</p> <p>6. 'Hot-spots' identified that deliver the highest levels of ecosystem services (multi-functional – see the Ribble Rivers Trust) that should be protected and enhanced.</p>	<p>2. In accordance with the requirements of the Duty to Co-operate any cross boundary issues that are identified will need to be carefully considered.</p> <p>3. Reference will be made to climate change resilience and how GI can help to mitigate against climate change and allow for adaptation.</p> <p>4. It has previously been established that Natural England's ANGSt Standards are not a workable standard in Pendle due to high density housing in the urban areas of the M65 Corridor. They do however provide a useful starting point for developing local standards for Pendle.</p> <p>5. Where appropriate reference will be made to the principles, policies, legislation and strategies mentioned.</p> <p>6. The main focus of the work will be to identify the GI assets in Pendle, the network of sites and any gap, and the opportunities to provide a more coherent GI network. 'Hot spots' may form part of the network however protection of such areas should come through policy rather than the GI Strategy.</p>
<p>Mark Chung Pendle &amp; Burnley Ramblers Footpath Officer Rambler Association</p>	<p>Actual list of proposed sites ASAP.</p>	<p>The identification of sites will begin once the scoping and methodology reports have been finalised.</p>
<p>David Penney Chairman Friends of Greenfield LNR Executive Committee Member Pendle LNR Steering Group</p>	<p>1) Integration: whereby biodiversity gain is safeguarded, enhanced, restored and wildlife habitat is linked between rural and urban (built) environment (e.g. development of ecological corridors linking communities).</p>	<p>1. One of the purposes of the GI Strategy is to identify opportunities to provide better linkages between sites where appropriate to help strengthen the GI network, particularly where this will have benefits for wildlife.</p>



## Pendle Green Infrastructure Strategy Scoping Report

Stakeholder	Comment	Officer Response
	2) Climate change: the development of biodiversity / green infrastructure should take into account the need for mitigation & adaptation (e.g. restoration of moorlands/wetland bogs; prevention of flooding).	2. The wider benefits of GI including climate change mitigation and adaptation will be fully reflected in the GI Strategy.
Dave Hortin Planning Technical Specialist Environment Agency	As point 1. The December 2015 floods severely affected areas downstream of Pendle. If GI can be used to hold back and slow water in the Upper Calder catchment, this will help to reduce the risk of flooding in Pendle and alleviate flooding in the lower reaches, outside of the Borough.  If multifunctional areas of land can be identified that can be used for flood protection/alleviation and other functions this would be useful to include.	Consideration will be given as to whether certain sites included in the GI Strategy could perform a flood alleviation function.
Mark Mullany Senior Planner Burnley Borough Council	Consideration of proposals/opportunities from Burnley GI Strategy which relate to areas bordering Pendle or to cross boundary linkages, plus any cross boundary issues relating to functions you may be covering which our Strategy didn't e.g. landscape character? (referred to in 'aims').	The Duty to Cooperate requires the Council to take account of any cross boundary linkages. The NPPG states that neighbouring authorities, working collaboratively with other stakeholders including LNPs and LEPS, may wish to consider how wider strategies for their areas can help address cross-boundary issues and help meet the Duty to Cooperate.
Dr John and Mrs Alison Plackett	If Pendle's GI Strategy is intended to be the vehicle for developing and delivering its biodiversity and ecosystems policy then for reasons already stated and those referenced in NPPF and PPG Natural Environment Biodiversity and Ecosystems document which include statutory obligations, then biodiversity and ecosystems are being inadequately considered. It is a core principle of sustainable development for planning policy to contribute to conserving and	The main focus of the work will be to identify the GI assets of Pendle, the gaps between them and any opportunities to provide a more coherent GI network.  By doing this the Strategy will contribute to conserving and enhancing the natural environment. The NPPG states that <i>"The components of green infrastructure exist within the wider landscape context and should enhance local landscape character and</i>

## Pendle Green Infrastructure Strategy Scoping Report

Stakeholder	Comment	Officer Response
	<p>enhancing the natural environment moving from a net loss of biodiversity to achieving net gains for nature.</p>	<p><i>contribute to place-making. High quality networks of multifunction green infrastructure provide a range of ecosystem services and can make a significant contribution to halting the decline in biodiversity.</i></p> <p>The GI Strategy will form part of a wider evidence base for the consideration of the natural environment (biodiversity, ecosystems, ecological networks etc).</p>
<p>David Cockburn-Price Chairman of the Steering Group East Colne and Villages Neighbourhood Plan</p>	<p>Scope seems fairly full/broad, but see Q1 re focus on tourism/visitors and inclusion of nature reserves and woodland.</p> <p>Reference is made to “open spaces”, but this should also consider green belt, greenfields, countryside brownfield etc, so that it can feed into a consideration of how protection can be assured of such assets for the long-term and what is possible for housing/industry development, e.g. rural brownfield and disused farm buildings, to help the rural economy and to help the provision of affordable housing for people who have grown up in the countryside and wish to potentially buy or build houses there.</p> <p>Looking alongside the economic, social &amp; environmental aspects of sustainability, there should be a focus on respecting and enhancing the “character” and “distinctiveness” of green areas with regard to habitats, ecology and landscape types.</p>	<p>The reference to “open space” relates to those sites formally designated as open space in the Local Plan. There may be parts of the Green Belt and other greenfield land that form part of the GI network, but the Green Belt designation alone does not automatically make the land an integral part of the GI network, as this is primarily determined by the functionality of the site.</p> <p>The Local Plan Part 1: Core Strategy already sets out the strategic policy approach for the protection of the natural environment and development of the rural economy. Additional details may be included in the Local Plan Part 2. However, it is not for the GI Strategy to set out the policy approach.</p>
<p><b>Q4. Have you any other comments?</b></p>		
<p>Jack Spees CEO Ribble Rivers Trust</p>	<p>RRT are the hosts and lead partners for the DEFRA CaBA for the Ribble and would be able to provide some assistance in data provision and maybe analysis.</p>	<p>Comments noted and possible provision of support welcomed.</p>

## Pendle Green Infrastructure Strategy Scoping Report

Stakeholder	Comment	Officer Response
<p>John Lamb Senior Conservation Officer Wildlife Trust for Lancashire, Manchester &amp; N. Merseyside</p>	<p>Should the GI Strategy and the Local Plan attempt to include the new designation of 'Local Green Space' introduced by the NPPF 2012? If so should the LGS replace the District Wildlife Sites in Pendle and would the LGS need to meet one or more of the site selection guidelines that have been drafted for Pendle (which are now applicable to Lancashire as a whole)?</p> <p>I am slightly cautious/wary of using the term <b>surplus</b> of GI space in Objectives and Outcomes, Stage 4: Standards and Provisions and Stage 4 in the timetable, as this may be taken by some to mean that there is too much of it so some should be developed. Alternatives could be that recommended supply/standards are exceeded, met, satisfied or are sufficient.</p> <p>Have any other councils in Lancashire carried out a needs and demands survey? There is no need to 'reinvent the wheel'.</p> <p>p.s. on the key stakeholders in Appendix 1, it is Tim Mitcham not Mitchell. Robin Gray is down twice (LNP - South Pennines and Pennine Prospects). I note that Network Rail is on the list but the Highways Agency isn't. Other NGOs could include: RSPB, National Trust and Woodland Trust – they may or may not want to be on the steering group but I am sure they would want to be consulted on the findings of the survey work, draft strategy and action plan.</p>	<p>The designation of Local Green Space (LGS) will be considered as part of the Local Plan Review. A Call for Sites consultation will allow such sites to be put forward for consideration. Clearly such sites will contribute to the GI Network.</p> <p>It is considered that district wildlife sites (Local Sites of Natural Importance (LNI)) should not be replaced by the LGS designation. The protection for LNIs is set out in Policy ENV1 of the Core Strategy and is specific to their status as wildlife sites. Although LGS sites may be designated for their wildlife interest, the NPPF policy would not provide the same level of protection.</p> <p>The NPPF (paragraph 73) clearly states that "The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area." Although the term surplus is used it is not considered to mean that the space is no longer required. However, it is agreed that this terminology should be clarified in line with the suggestions from the Wildlife Trust.</p> <p>Following internal discussions an alternative approach to the needs and demand assessment is being considered.</p> <p>Comments on Appendix 1 noted and amendments will be made accordingly.</p>

## Pendle Green Infrastructure Strategy Scoping Report

Stakeholder	Comment	Officer Response
Mark Chung Pendle & Burnley Ramblers Footpath Officer Rambler Association	No further comments at this time.	N/A
David Penney Chairman Friends of Greenfield LNR Executive Committee Member Pendle LNR Steering Group	I would like to see reference to Pendle Borough Council's policy of opposing fracking in the borough, as fracking would conflict with principles, vision and values of a Pendle Green Infrastructure / Biodiversity Strategy.	The issue of fracking is outside the scope of the GI Strategy. However, at a meeting of the Full Council in October 2015 it was resolved "that it (Pendle Council) opposes any exploratory drilling for shale gas in Pendle and will take all appropriate steps to prevent it happening".
Dave Hortin Planning Technical Specialist Environment Agency	No.	N/A
Mark Mullany Senior Planner Burnley Borough Council	Happy to discuss any issues arising which may have arisen in our GI Strategy, if appropriate.	Comments noted and the offer of support welcomed.
Dr John and Mrs Alison Plackett	<p>1) Does Pendle's planning policy unit have a separate document e.g. a DPD implementing NPPF and relevant PPGs , thereby making a significant contribution to the achievement of the commitments made by Government in it Biodiversity 2020 strategy?</p> <p>Outcomes and Objectives – bullet point 9</p> <p>2) Should 'functional' ecological networks be incorporated into wider GI or should GI be incorporated into the relevant areas of a coherent, resilient ecological network?</p>	<p>1. The Local Plan Part 1: Core Strategy provides the strategic context to help achieve the Government's biodiversity commitments. The Local Plan Part 2: Site Allocations and Development Policies may provide additional policy protections/requirements.</p> <p>2. The guidance suggests that high quality networks of multifunctional green infrastructure provide a range of ecosystem services and can make a significant contribution to halting the decline in biodiversity. As such it seems that it is not a case of incorporating one network into another, but to consider how each component/asset/site works within each network.</p>

## Pendle Green Infrastructure Strategy Scoping Report

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Stakeholder	Comment	Officer Response
	3) Barriers, large or small, should not exist within a 'functional' ecological network as ecologically coherent connections should exist to give functionality. It is the permeability of the landscape to species, or their genes, that matters.	3. It is agreed that barriers can restrict the functionality of an ecological network. For both the GI and Ecological networks – opportunities to remove barriers need to be identified, thereby helping to improve the functionality of both types of network.
David Cockburn-Price Chairman of the Steering Group East Colne and Villages Neighbourhood Plan	No.	N/A

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