

This Report will be made public on 4 July 2023



Report Number **C/23/10**

**To:** Cabinet  
**Date:** 12<sup>th</sup> July 2023  
**Status:** Key decision  
**Responsible Officer:** David Whittington Strategy & Policy Senior Specialist  
**Cabinet Member:** Cllr Stephen Scoffham, Cabinet Member for Climate, Environment and Biodiversity & Cllr Jim Martin, Leader of the Council and Cabinet Member for Otterpool Park and Planning Policy

**SUBJECT:** GREEN & BLUE INFRASTRUCTURE STRATEGY

**SUMMARY:**

The Green and Blue Infrastructure Strategy is an evidence base document for the local plan and other future planning documents, as well as being a material consideration for planning applications. It could also provide information for other initiatives and joint working.

The Strategy has been subject to engagement and consultation with specific groups, organisations and Councillors since work commenced and this led to the publication of a Priorities and Opportunities Summary document for a final district wide consultation earlier in the year.

This report provides a summary of the representations received and the proposed changes to the Strategy.

**REASONS FOR RECOMMENDATIONS:**

So that Cabinet can approve the proposed changes and the use of the documents as part of the Local Plans evidence base. The documents may also be used to identify joint working opportunities and to prioritise future actions.

**RECOMMENDATIONS:**

1. To receive and note report C/23/10.
2. That Cabinet approves:
  - i) The proposed changes to the Green & Blue Infrastructure Strategy (see Section 4); and
  - ii) The use of the Green and Blue Infrastructure Strategy and the draft Green and Blue Infrastructure Strategy Priorities and Opportunities Summary document as set out in Section 5.

## 1. BACKGROUND

1.1 Many environmental features make up green infrastructure, such as parks, gardens and allotments. This also includes water environments (termed 'blue infrastructure'). An important feature of green and blue infrastructure is that networks are strategically planned and that spaces and places are connected. Some green and blue infrastructure is publicly accessible, but it does not need to be accessible to be valuable.

1.2 The importance of green and blue infrastructure in planning is set out in Government policy and guidance. This has been reflected in the Council's own planning policy documents such as the Core Strategy Review and the Places and Policies Local Plan as well as other council documents such as the Corporate Plan and Carbon Action Plan. These are summarised below.

### **Government Policy**

1.3 Positive planning for green infrastructure is a requirement of the National Planning Policy Framework (NPPF). Paragraph 20 of the NPPF sets out that strategic planning policies should:

*“set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for ... d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”*

1.4 The development of Green Infrastructure Standards was a core commitment of the Government's 25 Year Environment Plan. Natural England have developed a comprehensive Green Infrastructure Framework which includes principles, standards, maps, process journeys and a planning and design guide. Mandatory biodiversity net gain, as set out in the 2021 Environment Act, will be applied in England through amending the Town and Country Planning Act (TCPA). The Government has stated that this will apply from November 2023 for developments in the Town and Country Planning Act 1990, unless exempt. It will apply to small sites from April 2024.

1.5 Also established under the Environment Act were Local Nature Recovery Strategies. This provides the opportunity to deliver an ecologically coherent and landscape scale, strategic approach to nature recovery. The Council is a partner in the LNRS that is being developed by Kent County Council. The Act establishes two mechanisms to support the delivery of local nature recovery strategies:

- mandatory biodiversity net gain
- a strengthened biodiversity duty on public authorities

The strategies will identify where action to achieve net gain will have the most impact and encourage action in these locations through the way net gain is calculated. All public authorities will also have to have regard to relevant local nature recovery strategies under the strengthened biodiversity duty.

### **Development Plan Policies**

- 1.6 A range of green and blue infrastructure priorities have been identified in the Council's Development Plan documents, the Core Strategy Review and the Places and Policies Local Plan (PPLP). The principal policies in the Core Strategy Review are CSD4 Green Infrastructure of Natural Networks, Open Spaces and Recreation and Policy CSD5 - Water and Coastal Environmental Management.
- 1.7 Green infrastructure is also fundamental to the proposed new garden settlement which is recognised by the Core Strategy Review in policies SS7 New Garden Settlement – Place Shaping Principles and Policy SS8 New Garden Settlement – Sustainability and Healthy New Town Principles.
- 1.8 In the Places and Policies Local Plan the relevant policies are Policy NE1 - Enhancing and Managing Access to the Natural Environment; Policy NE2 - Biodiversity; and Policy NE3 - Protecting the District's Landscapes and Countryside.

### **Corporate Plan & Carbon Action Plan**

- 1.9 Green and blue infrastructure are important to the service ambitions of the Corporate Plan 2021-30: Creating Tomorrow Together, particularly 'A thriving environment' as well as the Corporate Plan's guiding principles of a 'Greener Folkestone and Hythe', 'Locally distinctive' and 'Working effectively with partners'.
- 1.10 The Corporate Action Plan 2021-24 includes 'Ensure a clean, attractive and safe environment for residents, visitors and businesses', 'Improving cycling and walking routes', 'Take positive measures to encourage biodiversity' and 'Ensure the Garden Town is developed in a sustainable way in line with the agreed Otterpool Park Charter'.
- 1.11 Action 33 in the Carbon Action Plan is to complete this Green & Blue Infrastructure Strategy. The Priorities and Opportunities that have been identified in the Green & Blue Infrastructure Strategy also provide natural solutions to meeting the challenges of climate change.

## **2. SUMMARY OF THE GREEN & BLUE INFRASTRUCTURE STRATEGY**

- 2.1 Consultants were commissioned to work on an update of the 2011 Green Infrastructure Plan. They carried out a comprehensive evidence-gathering exercise which was followed by an analysis that included mapped datasets and the review of documents and strategies, from both Folkestone and Hythe and other organisations.
- 2.2 The Strategy sets out the district's strategic network of green and blue infrastructure and provides an assessment of the needs and opportunities, strategic priorities and future actions. It provides evidence to support spatial planning in the district. The summary is backed up by a more detailed Main Report.

2.3 Five evidence areas are described and assessed in the Strategy. These are:

- Biodiversity, trees and woodlands;
- Access, recreation and active travel;
- Health and wellbeing;
- Blue infrastructure and the coast; and
- Landscape character and heritage.

2.4 Each area includes a section on “Drivers of Change, Pressures and Threats” followed by a section on “Needs, Opportunities and Priorities”. The latter section sets out the projects and opportunities which would apply across the whole district and which are not confined to a particular geographic area.

2.5 The Strategy also considers the areas of the district and in this section the priorities and actions are examined in more detail. The areas reflect the Character Areas in the Core Strategy:

- Folkestone & Hythe Town;
- Romney Marsh; and
- The North Downs.

### **Key findings of the Green & Blue Infrastructure Strategy**

2.6 The key findings of the Strategy were:

- Due to the variety and extent of important habitats the district supports many specialised and rare species, such as Turtle Doves and Chalk Grassland Orchids;
- Green infrastructure is important in supporting a landscape-scale or ‘nature network’ approach, through securing biodiversity value in a planned way. Green infrastructure also helps to bring nature into urban centres, which also connects people with wildlife;
- Overall, Folkestone and Hythe’s tree canopy is around 8% of its area, less than half of the Kent average of 17%. There is a distinct north-south divide in the district. Romney Marsh ward was reported as having the lowest level of canopy, at 1.1%. However, given the history and character of the area this is to be expected;
- Climate Change vulnerability mapping by Natural England indicates that the fragmented, wetland and low-lying habitats around Romney Marsh are highly vulnerable;
- Development has been identified as the greatest pressure on Kent habitats, through loss of land and increased population. This pressure can be mitigated through obligations on developers to deliver biodiversity net gain;
- The location of new development, especially larger developments, will increase recreational use in new areas of the district;
- The transport corridor of the M20/A20, rail line and Channel Tunnel Rail Link is a significant barrier to access for Folkestone and other settlements to the south;
- Safety is an important consideration for users. Overgrown areas, poor sight lines, vandalism and litter can increase perceptions of lack of safety;

- Evidence shows that spending time in nature is also good for mental wellbeing.

## 2.7 The Strategy sets out fifteen 'strategic priorities'. These are:

Protect, enhance and improve the core biodiversity sites and take action for priority species. (ref. BTW 1)	Create an ecologically resilient network to join habitats, allow species to move and to help nature adapt to climate change. (ref. BTW 2)	Link people and nature. (ref. BTW 3)	Adapt and mitigate for climate change impacts. (ref. BTW 4)
Ensure development is sustainable. (ref. BTW 5)	Ensure that greenspace provision keeps pace with population growth and provides for Folkestone and Hythe's future residents. (ref. AR 1)	Support increased active travel, to relieve congestion and air pollution and encourage healthy living through a strategic cycle network and walking routes. (ref. AR 2)	Maximise the benefits of recreation and access to Folkestone and Hythe's unique landscapes and greenspaces, whilst ensuring that this does not have a negative impact on them, their special character or their biodiversity. (ref. AR 3)
Support people in taking healthy exercise and engaging in nature for both their physical and mental health. (ref. HW 1)	Provide access to green infrastructure close to home and which is inclusive for all. (ref. HW 2)	Initiate local evidence-informed research to understand the impact that accessible greenspace has on local health outcomes, especially for disadvantaged groups. (ref. HW 3)	Protect water resources and protect and enhance the biodiversity value of water and wetland habitats. (ref. BIC 1)
Incorporate SuDs schemes into new development and retrofit into existing green infrastructure where such an approach is appropriate to help address flooding issues. (ref. BIC 2)	Strengthen and reinforce landscape character and ensure green and blue infrastructure enhances and fits with local landscape character. (ref. LH 1)	Ensure heritage is recognised in green infrastructure planning, interpretation, and tourism. (Ref. LH 2)	

2.8 Priorities and opportunities are then identified for each of the strategic priorities. These are set out after each of the subject sections in a table. As these are wide ranging, there are a number that are not within the control of the district council and will need to be delivered in partnership or by other organisations.

2.9 To stress that the council cannot deliver the Green and Blue Infrastructure Strategy on its own, actions are set out according to the following coding:

- **A** – Actions within the control of Folkestone & Hythe District Council.
- **B** - Priorities within the scope of influence of F&HDC. Potential to be delivered by other organisations or in partnership with F&HDC.
- **C** – Priorities of importance in the district but not in control of F&HDC. Delivered by other organisations.

## 3. STAKEHOLDER AND COMMUNITY ENGAGEMENT

3.1 At the start of the study, questionnaires were sent to parish councils and organisations (including statutory bodies). This was followed by virtual workshops and meetings to explore green and blue infrastructure priorities with stakeholders, parish & town councils and district councillors. The findings from the workshops and the consultation responses were used to shape the draft Strategy.

- 3.2 A draft version of the document was the subject of a ‘focused’ consultation with parish and town councils and other organisations in 2022. The summary document was produced as a response to representations during that consultation.
- 3.3 The next stage in the process was to publish the Priorities and Opportunities Summary document for public consultation to seek the views of residents, groups and organisations. This took place earlier this year. The purpose of the consultation was to identify which actions should be prioritised, to identify joint working opportunities with other organisations and to foster public ownership of the document so that individuals may be inspired to undertake their own actions.
- 3.4 The next section of this report summaries the responses to the consultation and proposes the next steps. **Appendix A** sets out the responses and the proposed Council responses to them.

#### **4. RESULTS OF THE CONSULTATION ON THE PRIORITIES AND OPPORTUNITIES SUMMARY DOCUMENT**

4.1 The Council received 52 responses from 20 individuals, organisations and groups. Overall comments were supportive and complimentary. Public bodies, such as Highways England and the Coastal Communities Body, were generally supportive and were open to joint working on any project that may come forward. Southern Water suggested some changes to reflect specific design criteria for sustainable drainage systems (SuDS) and building design. Kent County Council was also supportive overall but suggested a number of minor amendments on a range of issues including Public Rights of Way (PROW) and Heritage. Some individuals, whilst supportive, expressed some scepticism about the council meeting the objectives. Comments received included:

- The ‘delivery’ aspect needs further explanation.
- Targets should be produced.
- Past council decisions do not align with the recommendations.
- Maybe over ambitious as a strategy.
- Domestic gardens are key but have largely been ignored in the report.
- Business parks need to be considered, not just residential.
- More trees should be planted as part of planning applications.
- Has it been produced independently from other areas of the council? For example, Otterpool is only mentioned twice.
- A very important omission is the older generations, especially those in their seventies and beyond.
- Active Travel is positive but has a fundamental flaw in that it needs to address the issue of the vehicle.
- Use less concrete in the pavilion at Dymchurch.
- Certain actions in Romney Marsh could apply to the two other character areas.

4.2 Suggested projects were:

- Create a new Linear Walkway along the old Harbour Line Railway.
- As a resident that contributes to the cost of maintaining a communal garden on the Leas (which are all owned by the Folkestone Estate) I would be pleased to help with engagement with local residents and the Folkestone Estate to improve the gardens for wildlife.
- Pent stream has not been identified, and the potential for FHDC to enhance and restore parts of the stream and its corridor have not been acknowledged.
- To significantly enhance the ecology of the Lower Radnor Park site, and un-culvert watercourses in some other greenspaces, creating some floodplain habitats.

### **Proposed Changes**

- 4.3 Following the consideration of the comments, only minor changes are proposed. **Appendix A** sets out the proposed responses against each of the comments.
- 4.4 As a summary, the changes relate to:
- Adding references and further information relating to clean beaches and bathing water quality;
  - Adding reference to the potential for trees and greening of industrial areas;
  - Add reference to the current (2021-2024) National Lottery Heritage Fund project Kent's Magnificent Moths in the main report;
  - Amending text commenting on the drainage network to reflect Southern Water's suggestion;
  - Clarifying issues with SuDS, such as heritage features (KCC);
  - Add a sentence to highlight heritage and health benefits (KCC).
  - Adding reference to the Pent Stream.
  - Adding cross-references to Kent County Council's guidance on Sustainable Drainage Systems (SuDS).
- 4.5 It is also proposed to review the actions listed and rationalise them, taking out any duplication.
- 4.6 The following points, raised through the consultation, are particularly highlighted for comment:
- **Delivery** - Several of the representations made related to delivery. Many of the actions identified in the Strategy within the remit of the Council are mainly covered by planning policy (such as provision of open spaces in new development) or through the maintenance of council owned land, so should be within the council's power to implement or influence. However, further discussions would have to take place with other organisations to see how joint or independent actions could be met. The potential for Community Infrastructure Levy (CIL) funding is also raised in the council's responses to the consultation comments; this is identified in the district's Infrastructure Schedule (November 2022) but would need to be balanced against other infrastructure demands.

- **Targets** - Related to delivery is the setting of targets. The Environment Act sets targets for biodiversity net gain that new developments will have to meet. In addition, the emerging Local Nature Recovery Strategy, which is being undertaken by the Kent Nature Partnership, is likely to set targets the council could use for the G&BIS. Targets for the council's own land could be explored with the grounds maintenance team, subject to the budget and operational demands. However, as the strategy is a high-level document encompassing the work of many different stakeholders, it is not considered feasible to introduce targets at this stage (for example, hectares of land restored or kilometres of waterway stabilised through planting).
- **Pent Stream** - The issue of the Pent Stream was not raised in earlier consultations but has been highlighted by two respondents during this recent consultation. There are instances of flooding from the Pent Stream and it is a Rapid Response Catchment and, therefore, there are wider issues. It is proposed to add reference to the Pent Stream as a potential project for further investigation. However, as any green infrastructure flood alleviation measures would need the agreement of a wide range of stakeholders, including the Environment Agency, Kent County Council, Parish and Town Councils, landowners and others, it is considered that it would not be possible to be more definitive in the current strategy.
- **Southern Water** - The final issue to raise is that Southern Water has requested that Action BIC 1.3 – should be moved from C to B delivery category which moves it into an area where FHDC have influence. BIC1.3 is to:

*'Achieve good status for watercourses. This includes a range of actions - improve fish passage, naturalise hard engineered riverbanks, reduce silt and enrichment from agriculture, improve highway runoff.'*

It is suggested that this action should remain in category C as the council has limited influence on this; Kent County Council is the highways authority and lead local flood authority, Southern Water has statutory duties, landowners and the Environment Agency will also be major stakeholders.

## **5 HOW THE DOCUMENT WILL BE USED.**

- 5.1 **Appendix B** sets out the final Strategy document (new text is highlighted in yellow). It will be used to identify projects to support the development strategy identified in the Development Plan. It will also be an evidence document which developers can draw upon when they are considering new proposals (therefore it will be a material consideration).
- 5.2 It may also be used to allocate funding from the Community Infrastructure Levy (CIL) for local, parish council-led schemes, as well as district-wide schemes, using relevant district or parish council CIL funding streams. (The emerging Green and Blue Infrastructure Strategy is referenced in the draft

CIL Infrastructure Schedule recently consulted on as part of the review of the council's Community Infrastructure Levy Revised Draft Charging Schedule (2022).)

- 5.3 In the longer term it is proposed to use the Green and Blue Infrastructure Strategy as the basis for a new Supplementary Planning Document to provide detailed guidance. It will also form the evidence base for the next local plan, which the team are in the early stages of preparing evidence for. The Levelling Up and Regeneration Bill, currently before Parliament, will require local planning authorities to produce design codes as part of the government's planning reforms. National guidance states that design codes should cover networks of spaces, open space provision, working with water, sustainable drainage, biodiversity net gain, street trees and other elements of green and blue infrastructure, which the strategy can support. The strategy can also be used as an evidence base document for other council strategies such as the developing District-wide Carbon Action Plan.
- 5.4 It is proposed that the strategy will be monitored through the Authority Monitoring Report, which the strategy team publishes annually, and through the Climate & Ecological Emergency Working Group.

## **6. OPTIONS**

- 6.1 The Strategy is an evidence base document for the Council's development plan and other future guidance documents. It is also a document that could help the evidence for other Council documents and strategies, such as the developing District-wide Carbon Action Plan. The options to consider are:
- i. Do not adopt the Strategy; or
  - ii. Adopt the Strategy.
- 6.2 The Strategy is both referred to with the Local Plan as well as being an evidence base document; to not adopt it would therefore have an impact on the delivery of the Natural Environment policies. The Strategy has been subject to consultation with Council Members, parish and town councils and specific groups and organisations, including statutory bodies. Although not a statutory document given the comprehensive consultation it carries significant weight in its own right.
- 6.3 It will enable the Council to focus efforts to enhance the natural environment including biodiversity where the most gains can be made and where the need is greatest. The Strategy through the consultation is imbued with a sense of ownership of the document by the stakeholders that took part in the various consultation exercises. The extensive evidence gathering forms the basis for the Council to engage in further work on green and blue infrastructure, subject to resources, and provides opportunities for further community engagement.
- 6.4 The documents also provide a mechanism for the Council to enact the new requirements placed upon it by the Environment Act in the most cost-effective way where they can most benefit the natural environment of the district as well as its community.

6.5 For these reasons it is recommended that the council adopt the Strategy, the second option.

**7. RISK MANAGEMENT ISSUES**

7.1 There is not a great deal of risk management involved with the Green & Blue Infrastructure Strategy. A summary of the perceived risks follows:

Perceived risk	Seriousness	Likelihood	Preventative action
That the strategy has limited impact on the green and blue infrastructure in the district	high	medium	<p>Consultation will help foster ownership with the public.</p> <p>Identifying and working with partners would ensure successful implementation.</p> <p>Using the strategy for general evidence for planning applications and for basis of a future Supplementary Planning Document (SPD).</p>

**8. LEGAL/FINANCIAL AND OTHER CONTROLS/POLICY MATTERS**

**8.1 Legal Officer’s Comments**

There are no legal implications arising directly from this report. (NM)

**8.2 Finance Officer’s Comments**

There are no financial implications at present (RH)

**8.3 Diversities and Equalities Implications**

There are no equality and diversity implications directly arising from this report. The Green and Blue Infrastructure Strategy will be subjected to a public consultation, if agreed by Cabinet to encourage a wider range of views on the ‘priorities and opportunities’ documented within strategy. The council should ensure suitable awareness is raised of the public consultation through its communication channels at the appropriate time. (GE)

**8.4 Climate Change Implications (HS)**

The issue of climate change is considered throughout the Green & Blue Infrastructure Action Plan both in terms of as a driver of change and potential solutions. It helps to identify natural solutions to the various impact

of climate change and as such contributes both to the aims of the reducing the Council's and District's carbon emissions to net zero by 2030.

## **9. CONTACT OFFICERS AND BACKGROUND DOCUMENTS**

Councillors with any questions arising out of this report should contact the following officer prior to the meeting

Hazel Sargent Strategy & Policy Specialist

Telephone: 01303 853318

Email: [hazel.sargent@folkestone-hythe.gov.uk](mailto:hazel.sargent@folkestone-hythe.gov.uk)

The following background documents have been relied upon in the preparation of this report:

### **Appendices:**

Appendix A: Comments on the Priorities and Actions Summary Document and Council Responses

Appendix B: Copy of proposed final draft of the Green and Blue Infrastructure Strategy Priorities and Opportunities Summary document (new text is highlighted).