

To: Climate and Ecological Emergency Working Group

Date: 20th April 2022

From: Hazel Sargent - Planning Policy Specialist

SUBJECT: Draft Green Infrastructure Strategy

SUMMARY: This report introduces the draft Green Infrastructure Strategy, its findings and recommendations. It is a local plan evidence document that will provide further detail to development plan policies as well as providing information for the consideration of planning applications. It could also form the basis for a future Green Infrastructure Supplementary Planning Document (SPD) to provide additional clarity for decision-making.

1. BACKGROUND

- 1.1. Consultants Blackwood Bayne were commissioned to work on an update of the 2011 Green Infrastructure Plan. They have carried out a comprehensive evidence gathering exercise which was followed by analysis of mapped datasets and a review of documents and strategies, from both Folkestone & Hythe District Council and other organisations. Drafts of the document have been shared with officers and teams across the council as the work has progressed. Workshops and meetings to explore green and blue infrastructure priorities were held virtually with stakeholders, local councils and elected councillors between February and April 2021. The findings from the workshops and the consultation responses have been taken into account in this strategy.
- 1.2. The draft Green Infrastructure Strategy is included as **Appendix 1** to this report. Completion of the Green Infrastructure Strategy would meet the service ambitions of the Corporate Plan 2021-30: Creating Tomorrow Together, particularly 'A thriving environment' and 'Positive community leadership', as well as the Corporate Plan's guiding principles 'Greener Folkestone and Hythe', 'Locally distinctive' and 'Working effectively with partners'.
- 1.3. It would also help to deliver the three-year ambitions of the Corporate Action Plan 2021-24, including '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'.
- 1.4. The production of the Green Infrastructure Strategy fulfils action 33 in the Carbon Action Plan. It will also provide natural solutions to meeting the challenges of climate change.

2. SUMMARY OF THE STRATEGY

- 2.1. The strategy takes a multi-functional and cross-boundary approach to green infrastructure planning. Although this evidence base is presented in themes, an important aspect of green infrastructure planning is to take a multidisciplinary approach and to seek opportunities which address issues across many areas. The strategy is in three parts.
- 2.2. In Part 1 of the strategy five evidence areas are described and assessed. Each area includes a section on 'Drivers of Change, Pressures and Threats' followed by a section on 'Needs, Opportunities and Priorities'. These sections set out the projects and opportunities which apply across the whole district and which are not confined to a particular geographic area. The evidence areas are:
- Biodiversity, trees and woodlands;
 - Access, recreation and active travel;
 - Health and wellbeing;
 - Blue infrastructure and the coast; and
 - Landscape character and heritage.
- 2.3. In Part 2 three broad areas of the district are described in more detail, alongside priorities and actions: Folkestone town, Romney Marsh and the North Downs.
- 2.4. Part 3 is concerned with delivery. At the moment it is relatively brief as it deals with delivery at a high level. However it is clear that delivering the strategy will require partnerships between a number of organisations and individuals. As the strategy states:
- “The aims in this strategy are not all within the remit of Folkestone and Hythe Council to deliver but are considered important in order to set out an ambition for Folkestone and Hythe.”
- The council has already engaged in partnership working with multiple organisations, individuals and teams through its work in delivering the Dungeness Sustainable Access and Recreational Management Strategy (SARMS).
- 2.5. It is proposed that an action plan will be produced that sets out projects at a more detailed level, including delivery partners and associated costings. It is also proposed that the action plan is the subject of focussed consultation with expert and community organisations who are likely to have projects or would be instrumental in delivering projects (see Section 8 below).
- 2.6. Each component part of green infrastructure has the potential to deliver wider benefits (functions), including recreation, biodiversity, health, climate change mitigation and adaptation and water quality (termed 'multi-functionality'). When planned, designed and managed as a network, these benefits are maximised. Green and blue infrastructure networks cross local authority boundaries and the strategy considers biodiversity, strategic access routes, watercourses and other green and blue infrastructure across neighbouring authority boundaries.

3. NATIONAL AND LOCAL CONTEXT

3.1. 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.”

As well as enabling the council to meet the requirements of the NPPF, the strategy will assist the council in meeting the requirements of new legislation. The development of Green Infrastructure Standards was a core commitment of the Government's 25 Year Environment Plan. Natural England are developing a National Framework of Green Infrastructure Standards with the aim to roll these out in 2022. 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). This part of the 2021 Act is planned to become a mandatory requirement in 2023.

3.2. A range of green infrastructure priorities have been identified in the Core Strategy Review (2022) and the Places and Policies Local Plan (2020). In the Core Strategy Review these policies are principally: Policy CSD4 - Green Infrastructure of Natural Networks, Open Spaces and Recreation and Policy CSD5 - Water and Coastal Environmental Management. In the Places and Policies Local Plan relevant policies include: Policy NE1 - Enhancing and Managing Access to the Natural Environment; Policy NE2 - Biodiversity; and Policy NE3 - Protecting the District's Landscapes and Countryside. These can be summarised as:

- Provision of green infrastructure corridors for access and wildlife;
- Adapting to and managing impacts of climate change;
- The identification of strategic green infrastructure opportunities;
- Access management, especially in relation to Natura and sensitive sites;
- Avoiding the fragmentation of habitats;
- Increasing the multi-functionality of green spaces, including potential enhancements to public open spaces and sports green spaces;
- Identifying network and qualitative deficiencies in the most accessible, ecologically or visually important green infrastructure;
- Improving the green infrastructure fringe zones identified in the Core Strategy Review, including access, biodiversity and landscape improvements and linking corridors;
- Targeting biodiversity enhancements;
- Dealing with the impact of development on nutrient enrichment in the Stodmarsh system of protected sites north east of Canterbury; and
- Setting out a framework for biodiversity net gain.

3.3. Green infrastructure is also fundamental to the proposed new garden town which is recognised by the Core Strategy Review in Policy SS7 New Garden Settlement – Place Shaping Principles and Policy SS8 New Garden Settlement – Sustainability and Healthy New Town Principles. The consultants who have produced the Green Infrastructure Strategy have fed into the process of producing the planning application on the issue of green infrastructure, having provided a ‘critical friend’ analysis of the approach to green infrastructure by the Otterpool Park Limited Liability Partnership.

4. FINDINGS AND IMPORTANCE OF THE DISTRICT'S GREEN INFRASTRUCTURE FOR BIODIVERSITY

4.1. Due to the variety and extent of important habitats the district supports many specialised and rare species. Below are examples of species identified in the Green Infrastructure Strategy for which the district is important:

- **Turtle Doves:** The Turtle Dove, a Kent Biodiversity Action Plan priority species, is the UK's fastest declining bird species and is threatened with global extinction. The RSPB has identified 'Turtle Dove Friendly Zones' (TDFZs) and works with Natural England and local farmers to provide feeding habitat and supplementary feeding. Two TDFZs are within Folkestone & Hythe District.
- **Medicinal Leeches:** By the beginning of the 20th century, the medicinal leech was declared extinct in the British Isles. However, since 1970, populations have been found scattered across the British Isles, including in the Romney Marsh.
- **Chalk Grassland Orchids:** The outstanding chalk grasslands of Folkestone and Hythe are home to several rare orchids, including monkey orchid, late spider orchid, early spider-orchid, musk orchid, lady orchid and burnt orchid.

4.2. 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.

4.3. Overall, Folkestone & Hythe's tree canopy is around 8 per cent of its area, less than half the Kent average of 17 per cent. There is a distinct north-south divide in the district: the highest coverage is in Hythe at 19 per cent; Romney Marsh ward was reported as having the lowest level of canopy, at 1.1 per cent. However given the history and low-lying agricultural character of the area this is to be expected. Any increase in tree and woodland cover, should therefore follow the principles of 'right tree, right place'. Trees should be planted where this fits with the landscape character. The wide range of woodlands in Folkestone & Hythe all have value for wildlife. Around 1,320 hectares, or 57 per cent, of Folkestone & Hythe's woodland is ancient. Ash dieback could result in profound changes to wildlife and landscape, due to the high proportion of ash in many of the district's woodlands.

4.4. Natural England has developed a climate change vulnerability model to assess the vulnerability of priority habitats. The model uses four measurements which, when combined, provide an overall assessment of vulnerability to climate change. (As the model only includes priority habitats some important habitat areas which are not in Natural England's dataset are not included.) The mapping shows that the fragmented, wetland and low-lying habitats around Romney Marsh are highly vulnerable. The chalk stream in the Elham Valley and the Royal Military Canal are also noticeable as vulnerable.

5. ISSUES IDENTIFIED IN THE DISTRICT

5.1. At the end of each evidence area in the strategy, there is a section that sets out the drivers of change, pressures and threats. The following points are particularly notable:

- Climate change impacts compounded by other threats to habitats and species;
- Lack of resources to manage some nature conservation sites sustainably and in the long term;

- Development has been identified as the greatest pressure on Kent habitats, through loss of land and increased population. This pressure can be mitigated in part 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, railway line and Channel Tunnel Rail Link is a significant barrier to access for Folkestone and other settlements to the south;
- Woodland which is small, fragmented and not managed;
- Increase in invasive non-native species, pests and diseases particularly ash dieback;
- Safety is an important consideration for users. Overgrown areas, poor sight lines, vandalism and litter can increase perceptions of lack of safety;
- There are deficiencies of accessible green space¹ in parts of the district, namely Lympne, Sellindge, Brookland and Brenzett;
- Some areas of poor health also have low levels of greenspace such as Brenzett and St Mary in the Marsh;
- Evidence shows that spending time in nature is also good for mental wellbeing. Folkestone & Hythe has a range of good green spaces. Examples include Lower Leas Coastal Park and the Warren: these should be invested in for the future;
- Folkestone & Hythe is at risk of flooding from a number of sources, including tidal and surface water flooding, as well as flooding from groundwater, streams, ditches and the coast;
- Summer droughts are also likely to be more frequent, alongside an increased risk of flooding. This combined with increased demand from development requires an active approach to the management of both risks through the planning system;
- Parts of the Landscape Character of the district are much more affected by nearby development than others. In the eastern part, around Folkestone, views from the scarp are affected by developments around Folkestone and associated with the Channel Tunnel Rail Link; and
- The landscape is sensitive to the impacts of development and infrastructure within and beyond the Kent Downs Area of Outstanding Natural Beauty (AONB) boundary.

6. STRATEGIC PRIORITIES

6.1. The strategy sets out strategic priorities in the 'Needs, Opportunities and Priorities' section for each evidence area; these are broken down into further priorities. The section sets out the projects and opportunities which apply across the whole district and which are not confined to a particular geographic area. The strategic priorities are:

1. Protect, enhance and improve the core biodiversity sites and take action for priority species;
2. Create an ecologically resilient network to join habitats, allow species to move and to help nature adapt to climate change;

¹ Accessible green space: places available for public access, usually free of charge and without time restrictions.

3. Link people and nature;
4. Adapt and mitigate for climate change impacts;
5. Ensure development is sustainable;
6. Ensure that greenspace provision keeps pace with population growth and provides for Folkestone & Hythe's future residents;
7. Support increased active travel, to relieve congestion and air pollution and encourage healthy living through a strategic cycle network and walking routes;
8. Maximise the benefits of recreation and access to Folkestone & Hythe's unique landscapes and green spaces, whilst ensuring that this does not have a negative impact on them or their biodiversity;
9. Provide access to green infrastructure close to home and which is inclusive for all;
10. Support people in taking healthy exercise and engaging in nature for both their physical and mental health;
11. Initiate local evidence-informed research to understand the impact that accessible greenspace has on local health outcomes, especially for disadvantaged groups;
12. Incorporate Sustainable Drainage Systems (SuDS) into new development and retrofit into existing green infrastructure where such an approach is appropriate to help address flooding issues;
13. Protect water resources and protect and enhance the biodiversity value of water and wetland habitats;
14. Strengthen and reinforce landscape character and ensure green and blue infrastructure enhances and fits with local landscape character; and
15. Ensure heritage is recognised in green infrastructure planning, interpretation, and tourism.

6.2. Examples of lower level priorities include to:

- Develop a tree and woodland strategy to ensure tree planting follows principle of 'right tree, right place';
- Promote sustainable woodland management;
- Plan for the effects of ash dieback;
- Increase the overall tree canopy of Folkestone & Hythe, and designate more Local Nature Reserves to increase the hectare provision per 1,000 people with a more even distribution across the district.

7. STRATEGIC AND SPATIAL OPPORTUNITIES

7.1. The district has been divided into three broad areas, in which the priorities and actions are examined in more detail. The three areas align with the Core Strategy Review and are:

- Folkestone town, Hythe and Saltwood;
- Romney Marsh; and
- North Downs.

Folkestone town, Hythe and Saltwood

- 7.2. There are several actions and recommendations which relate to green and blue infrastructure, including: creating unified public spaces, public realm greening and new public spaces; wayfinding and enhancing the cycling and walking experience, creating better connections; planting and landscaping for biodiversity, sustainable drainage and carbon sequestration. These should be prioritised as part of any regeneration of the town centre. Access for residents out of Folkestone to the north is severely restricted by the severing effect of transport infrastructure corridors. The railway to the south also limits access choices for these residents. The strategy focuses on the undeveloped land west of Folkestone from Shorncliffe and St Martin's Plain and north of Hythe and Saltwood. It is bounded to the north by the transport infrastructure of the A20 and railway line. Most of this area is within the Kent Downs AONB.
- 7.3. There are threats to this landscape. Although it is well-treed, the woodland blocks and hedgerows are threatened by ash dieback. Climate change is likely to lead to hotter drier summers, and warmer, wetter winters. The area is surrounded by urban areas to the east and south, with Otterpool Park planned along the western edge. This is an important area for recreation for current and future residents, particularly as there are only two access points across the transport corridor in the north. A large, and growing, local population will put pressure on recreation facilities within the landscape, such as public footpaths, which can result in erosion and damage. Providing high quality, well managed multi-functional paths to recreational spaces that can accommodate high levels of use, will help to protect more fragile elements of the landscape from indiscriminate use. These should be managed to direct visitors away from vulnerable 'honeypot' areas and to disperse recreational pressure.
- 7.4. One of the priorities for this area is to take a holistic view and develop a plan for biodiversity, landscape, blue infrastructure and access in the Saltwood and Hythe area. This should include interactions with urban fringe and accommodate the new Otterpool Park development in a way that takes account of the issues mentioned.

Romney Marsh

- 7.5. There is the need to strike a continual balance in an area that is internationally important for geomorphology and wildlife, but where local communities make a living and enjoy the natural assets on their doorstep. One of these is Coast Drive Car Park. This area is under-utilised, dilapidated, and provides little benefit to the community. It is adjacent to designated wildlife sites and therefore it is imperative that assessments and mitigation measures are agreed in advance - the project is being planned and designed with this in mind
- 7.6. A priority for this area would be to consider a new cycle path from Lydd to New Romney to take traffic off the road and give families who haven't any other way of travelling, a chance to explore areas nearby. Many people in this area are unable to have holidays as it is a deprived area. This would help them with mental and physical wellbeing. Employees of the Dungeness Power Station would also benefit if a cycle path was put in situ along Dungeness Road, again taking traffic off the roads.
- 7.7. Another priority would be to plan strategically to ensure destination green spaces such as Dungeness RSPB, Dungeness Point, the Royal Military Canal, Romney Hythe and Dymchurch Railway and the coast are connected through promotional routes.

The North Downs

- 7.8. Most of this area is within the Kent Downs AONB. Woodlands are a prominent feature of the landscape and chalk grassland is particularly notable. The Open Spaces Strategy showed that in the North Downs some areas are currently below the quantity standard, for example Sellindge. Plans for new open spaces in Otterpool Park will help to alleviate this deficit and good access into them from these areas should be encouraged in the master planning process. Between Lyminge, through Elham and Wingmore is the course of the Nailbourne, a chalk 'bourne' which only flows at some times of the year.
- 7.9. Priorities include to protect the tranquillity of the landscape and sensitively manage, promote and celebrate the area's rich cultural and natural heritage, famous landmarks and views for future generations. Working in partnership with the Kent Downs Area of Outstanding Natural Beauty Unit to identify management opportunities in accordance with their management plans. Another priority that was identified through the workshops was a project to address the current lack of biodiversity and flooding problems associated with the Nailbourne.

8. PROPOSED NEXT STAGES

- 8.1 The Green Infrastructure Strategy (see **Appendix 1**) is referenced in the Places and Policies Local Plan and the Core Strategy Review. It provides important evidence to enable the implementation of the policies in the two local plans. To ensure that it carries weight in decisions on planning applications, it would need to be adopted in some form - we would suggest as a Supplementary Planning Document (SPD) on Green Infrastructure, of which the main body could form the basis to provide guidance to developers.
- 8.2 The document has the potential to be wider than planning in terms of potential actions. However those actions would meet other objectives such as contributing to the Corporate Plan and Carbon Action Plan. The proposed Action Plan would make clear what partnerships are required for delivery (like the SARMS). Those actions that would fall within the council's responsibility would require monitoring either separately or through the Authority Monitoring Report (a monitoring document on the development plan that is published annually).
- 8.3 The consultants have produced an initial draft action plan of projects at a more detailed level (see **Appendix 2**). This draft action plan identifies priorities and needs, not all of which are within the direct control of the council, or which can be delivered by the council alone. The actions are therefore colour-coded to reflect this. As well as details of the projects it is intended to include information about partnerships delivering the projects and estimated costings. This would be similar to the action plan previously produced for the SARMS. It is proposed that the strategy and action plan are the subject of a focussed consultation with expert and local environmental organisations to ensure accuracy and relevance. This would also help to identify projects for inclusion in the plan. Again it is suggested that this would follow a similar process to the one undertaken for the SARMS, which was subject to a four-week focussed consultation.
- 8.4 Canterbury City Council's Green Infrastructure Strategy that was produced in 2018 was subject to a period of public consultation. Very little of the document was changed as a result but it was felt that the consultation helped to foster a sense of public ownership of the document. Consultation in the form of workshops was undertaken with environmental groups, expert organisations, Parish Councils, council officers and Members to understand the issues with the area. For the Folkestone & Hythe Green Infrastructure Strategy, it is suggested that rather than consulting on the entire

strategy, public comment is invited on the final version of the action plan. This may identify more opportunities and enable the consultation to be more focussed, as well giving the public a sense of ownership.

- 8.5 A presentation on the Green Infrastructure Strategy work was given to the Climate & Ecological Emergency Working Group and then to all members as part of an event to inform all members of the work. It is suggested that following the two periods of consultation the Green Infrastructure Strategy, the action plan and results of the consultations are presented to Cabinet.

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Appendix 1: Folkestone & Hythe Green and Blue Infrastructure Strategy (third draft April 2022)

Appendix 2: Folkestone & Hythe Green and Blue Infrastructure Strategy – Draft Action Plan (April 2022)