

National Green Infrastructure Standards Trial - West Yorkshire online survey feedback response

Key Points

- The draft Standards Framework offers significant potential at national and local levels to support local authorities and delivery organisations in increasing delivery of multi-functional green infrastructure and maximising the benefits of green infrastructure for the environment and human health
- However draft Standards Framework and its components need further revision and expansion, if it is to fulfil its potential and provide the greatest amount of support to local partners possible, especially given new requirements on local authorities in development of nature recovery strategies and addressing net biodiversity gain requirements as part of the planning process
- The focus of the Standards Framework – exemplified in the proposed core standards for GI (Accessible Natural Greenspace standards - ANGSt) may be too focussed on concepts around accessibility – which risks working against the core principle proposed of multi-functionality and give insufficient emphasis to the ecological benefits of GI, including protecting/enhancing biodiversity, carbon mitigation and reduction of flood risk.
- An understanding of the extent of accessible natural greenspace, and levels of access to it, is useful as a way of understanding where there are deficiencies in terms of people's ability experience nature and greenspace – which helps build wider understanding of the importance of nature and of conserving it. However, the updated ANGSt proposals in isolation may not be sufficiently balanced as a metric to assess the level of provision of multi-functional, high quality GI – and should be used in conjunction with others, potentially as a sub-set of an overarching measurement tool.
- The guidance provided in the draft framework – and the associated national data set and mapping – provides a useful basis for local authorities in developing GI policy and making use of the national data set. We would like to see this expanded to provide more detailed guidance on the principles and policy development, as well as on ways to make the most of the national data set and online mapping platform.
- Incorporation of the Standards Framework into the national planning framework, potentially providing statutory status for the Framework, would ensure that the Framework would have the greatest possible impact in terms of multi-functional greenspace provision, local planning authorities must retain the ability to develop and implement policy that suits individual circumstances and locally determined objectives. More information is needed on government/Natural England's long-term ambitions for the Standards Framework.

Q1: Please state your name and the name of your organisation

Q 2.1 Which elements of the draft GI Framework did you make use of during the trial?

	Not considered at all / as relevant	Considered, but dismissed	Partially completed	Completed
National Principles(summary)			X	
National Principles(detail)			X	X
Process map 1 - developing a green infrastructure strategy		X		
Process map 2 - Developers and Design Team		X		
Process map 3 - Development Managers within Local Planning Authorities (LPAs)		X		
Process Map 4: Neighbourhood Plans	X			
Mapping products			X	
Updated & extended ANGSt			X	
Urban Greening Factor			X	

Q2.2 – The draft GI framework as a whole -a.) Please rate the following statements

	Strongly agree	Agree	Disagree	Strongly Disagree
It is easy to read and navigate			X	
It contains the right level of detail (neither too much nor too little)				
It is helpful, useful and easy to use with colleagues and partner organisations			X	
The GIST trial has enhanced the understanding of GI within the trial area		X		

b.) Please provide any comments on the draft GI framework as a whole (or state N/A)

A key issue for Natural England to consider is the role that the Standards Framework is intended to play in national policy – including future planning policy. More background information is needed within the document to set out the intended purpose of the Standards Framework within national policy; and what the implications or requirements will be on local planning authorities as a result.

We recognise that the Standards Framework offers real opportunity to support delivery of good green infrastructure, and the potential to embed it within the national planning policy framework help local planning authorities in manage development and realise local policy relating to green infrastructure – ensuring that existing greenspace can be protected, and opportunities taken to enhance and create new green infrastructure.

However, the development of a national set of Standards raises the question of interaction with locally developed strategy and standards adopted in Local Plans – for example whether one or the other have primacy, and what the implications might be of this, for example on access to greenspace standards – see below our response on ANGSt. Across our region, local authority partners have existing policy in place or in development relating to green infrastructure and greenspace – and development of policy is a process likely to be prompted by new requirements around Net Biodiversity Gain and Nature Recovery Strategy development.

We suggest that a national Standards Framework should complement and support local policy rather than supplant it – and the ability of local authorities to develop their own locally appropriate policy and standards must be maintained. Any future statutory status for the Standards Framework needs to ensure sufficient flexibility for local authorities to maintain this. The best outcome would be a set of national Standards that can act as a foundation

where local policy has not been developed and adopted – but that complement local policy where it is in place.

The Standards Framework seems somewhat isolated or separate from other national policy/strategy – including other green infrastructure related workstreams led by Natural England. The Framework needs to be integrated with other policy nationally as well as locally. Development of Net Biodiversity Gain and Nature Recovery Strategies are two significant examples – the draft Standards framework makes no reference to the Nature Networks Evidence Handbook and the principles for development of Nature Networks set out in the handbook which are likely to overlap with the Principles for Good Green Infrastructure.

The Standards Framework provides a basis for promoting best practice in multi-functional green infrastructure delivery. However, it isn't clear how the Standards Framework will influence investment decisions and appraisal to ensure development (including public sector led highways/transport investment) - so as to incentivise opportunities to enhance or create green infrastructure are included in development schemes.

Although the Standards Framework document defines Green Infrastructure as including blue infrastructure, use of GI as an umbrella term could risk Blue Infrastructure (and the importance of its role in supporting habitats, eco systems services and benefits for physical and mental health) being marginalised. Natural England should consider whether reference to Green and Blue Infrastructure might be a better title and terminology to be adopted.

Q 2.3 –the 6 National Principles of Green Infrastructure. a.) Please rate the following statements

	Strongly agree	Agree	Disagree	Strongly Disagree	Did not look at this
The 6 National Principles summary is a useful communication tool		X			
The detail on the 6 National Principles is useful for checking and improving existing documents or those being drafted		X			
The checklists for the 6 National Principles helped assess our progress in planning/delivering good GI and in identifying areas where we could improve		X			

b.) Please provide any comments on the 6 National principles of GI (or state N/A)

The proposed Principles for Good GI, and detailed guidance with self-assessment checklists provide local authorities with useful challenge and steer on development of best practice policy and strategy for green infrastructure

We feel that there is potential for overemphasis on green infrastructure as recreational/accessible space – e.g. focus on accessible greenspace; use of ANGSt. This may work against the principle of multi-functionality and lead the Framework to focus on greening the urban environment – meaning that the objectives to deliver green infrastructure that provides greater range of ecosystem services are not met. Although the draft Principles make reference to biodiversity and nature (e.g. NP01 and N04) the principles and guidance could give greater recognition to the role of green infrastructure in supporting nature recovery, including building resilience for nature, restoration of natural processes and providing buffers for sensitive sites. There should be recognition that in some specific cases, lack of public access might be important in preserving habitats and biodiversity.

However we recognise that maximising access to greenspace and good quality Green Infrastructure remains an important objective. The draft Standards Framework should recognise and reflect that access to green space is not just a function of location/size and distance from greenspace – that quality/nature of journey to greenspace is as important and needs to be considered an innate part of access to greenspace both in principle and in development of metrics/standards.

We have identified some specific areas where the draft Principles and associated checklists which could be strengthened:

Carbon

The Combined Authority and its local authority partners declared Climate Emergencies in 2019 and since then, work to identify Carbon Emissions Reductions Pathways for the region is demonstrating the challenging range of new policies and actions required to meet the ambition we have for a net zero carbon economy in the region by 2038.

The current draft Principles identify that addressing climate change as one of the core benefits offered by good, multifunctional green infrastructure (in NP1) – but this could be worded to show that GI can help reduce or mitigate against carbon emissions as well as making places more resilient to climate change.

The role of good GI in addressing carbon emissions through GI should be theme that runs through the Standards Framework. Other elements of the Standards Framework (e.g. the proposal for ANGSt to provide a quantifiable standard for GI) don't appear to reflect this currently as strongly as they could.

Economic benefits

The direct economic benefits offered by green infrastructure delivery is not always reflected in discussions around GI. The draft Principles should be strengthened in this respect - in particular principle NP4. This references the role GI can play in supporting prosperous communities – but not in terms of the direct economic impact and new jobs that GI delivery and ongoing stewardship offers.

Other

Landowners are necessarily a key group of stakeholders in enhancing or creating new GI - their importance should be more clearly identified as part of Principle NP2.

Guidance NP05 for cycle design should reference Local Transport Note 1/20 Cycle Infrastructure Design (<https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>). This is the national design guidance (and standard) for cycle infrastructure design and will be used by a new body, Active Travel England, to ensure that these design standards are met by local authorities in new schemes (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf#page=20)

Q2.4 –The Process Maps. a.) Please rate the following statements

	Strongly agree	Agree	Disagree	Strongly Disagree	Did not trial this
Process map 1 - developing a green infrastructure strategy, is useful and pragmatic and can easily be applied to the process					X

Process map 2 - Developers and Design Teams, is useful and pragmatic and can easily be applied to the process					X
Process map 3 – Development Managers within Local Planning Authorities (LPAs), is useful and pragmatic and can easily be applied to the process					X
Process map 4 – Neighbourhood Plans, is useful and pragmatic and can easily be applied to the process					X

Please provide any comments on the process maps (or state N/A)

The Process Maps provided offer a useful starting point for development of GI policy or delivery of GI – but can be somewhat generic/high level. Local partners hope to see more detailed versions developed for greater detail and guidance to support local authorities. E.g. on stewardship/maintenance. Can trial areas provide more positive examples?

The process maps could be expanded to encompass different audiences (as recognised in the current draft). Combined Authorities/other regional level authorities have a role in delivering Green Infrastructure – for example although not local planning authorities, they may have a role in developing regional strategy, creating investment pipelines, and managing large scale infrastructure investment.

Likewise the Process Map for Developers and Design Teams should reflect the fact that local authorities themselves can be important in delivering green infrastructure, as promoters of infrastructure schemes such as new/improved highways projects.

Question 2.5 –ANGSt and the Urban Greening Factor. a.) Please rate the following statements

	Strongly agree	Agree	Disagree	Strongly Disagree	Did not trial this
The updated and extended ANGSt will ensure better and more equitable provision of GI in the future			X		
The Urban Greening Factor can be easily adopted and applied for our local circumstances and could become a valuable addition to our policy tools			X		

b) any comments on ANGSt and Urban Greening Factor

Although we recognise that the Standards Framework is a set of quantified standards and is still in development, we would have concerns if ANGSt is seen as the main/one of the main quantitative standards to be adopted through the Framework.

Net environmental gain should be seen as of equal importance as accessibility to greenspace – if the standards framework does not include a suitable quantified standard alongside ANGSt, the opportunity for the GI Standards Framework to support net environmental gain could be lost as a result.

ANGSt doesn't seem to fit well with principle of multi-functionality for good Green Infrastructure and so should only be used as a subset of a wider standard around environmental gain or wider benefits/multi functionality (for example, as the Ecometric proposal promises).

Use of ANGSt alone or as the key standard within the Framework may also affect rural authorities in particular where there may be a need to focus on greenspace/infra for eco system services rather than just accessibility for local residents. For example, use of areas of greenspace/ green infrastructure to focus on providing eco-system services such as flood risk reduction may be more important in upland rural areas, which will have benefits for urban areas downstream.

Part of the opportunity for local authorities afforded by the national Standards Framework is to greater support to be provided in planning for GI locally, by bringing together complex datasets to enable a simpler and more easily understandable analysis to be undertaken, applied consistently across all local authority areas. Ideally the range of different standards or metrics under discussion would be brought together as a single metric or standard.

If this is not possible, then this opportunity to support local authorities better will be missed, and in the worst case scenario, could risk imposing greater pressure on local authorities with duplication of resources – for example leading to a requirement of duplicating mapping analysis (e.g. to assess accessibility and then separately, environmental net gain).

We appreciate the challenges in bringing together the range of existing standards and metrics into a single tool. Natural England should therefore consider which of existing or potential measures offers the greatest potential to provide the most “rounded” picture of existing and potential GI provision in an area. For example, Eco Metric appears as though it could provide a more balanced/wider ranging analysis of the different benefits provided by different areas of greenspace.

Natural England will be aware that local authorities, including in our region, have adopted their own standards for access to greenspace, which have been in place for some time and have been tailored to suit local policy objectives and circumstances. These are often more sophisticated/nuanced than ANGSt, incorporating a greater range of variables– e.g. focussing on quality of greenspace, health characteristics of local populations. These standards have also been based on other existing guidance such as that developed by Fields in Trust.

If ANGSt is incorporated into the Standards Framework as a standard for green infrastructure, the Framework will need to provide flexibility to enable local authorities to use their own standards which can provide a more balanced set of standards. In some cases locally defined standards have been recently developed or updated as part of adopted Local Plans, so it will be important that the creation of national Standards do not create a contradiction with locally appropriate standards.

In our region, ANGSt has not been necessarily widely adopted in original form (although it has been used as a basis for development of local standards). The proposed update to ANGSt won't necessarily address this and Natural England should consider if it may be more useful to understand why it hasn't been adopted by local authorities within their Local Plan and policies than making adjustments to the current standards.

In terms of ANGSt as a way of understanding access to natural greenspace, there some fundamental issues. The journey by foot or cycle to areas of green space is not considered as part of ANGSt and yet has a significant impact on the actual accessibility of greenspace by local residents. Usage of an assessment framework such as that being tested in West Yorkshire (our “Streets for People” approach) or Healthy Streets approach developed in London could provide a means to assess this, as well as assessment tools specifically designed for assessing cycling and walking environments as identified in national guidance¹

Access to larger areas of greenspace (the upper thresholds) could consider access by public transport as well as walking and cycling – this is likely to be of particular significance for access to larger sites and may be less narrow than basing accessibility by walking and cycling only – which may not reflect actual behaviour and may set standards that may not be realistically achievable in dense urban areas. For example, the sub-regional threshold (within 10km) is beyond reasonable walking distance, and at the upper limit of typical cycle journeys – but is suitable for bus or rail journeys. West Yorkshire has an extensive rail and bus network providing access to a range of regionally and nationally important greenspaces and so public transport can play an important role in providing access to these larger areas of greenspace.

Access to greenspace shouldn't just focus on physical access through greenspace (e.g. on footpath network). Although physical access within woodlands or farmland might be restricted, users effectively benefit from the surrounding greenspace beyond the extents of where linear access is available. This may mean that areas of greenspace that provide these kinds of health benefit are under-represented in ANGSt analyses and areas of deficiency potentially overstated.

An appropriate definition of natural is likely to be difficult to achieve. There are a number of potential definitions for this term and agreement will be needed on the appropriate one to be used in ANGSt assessments. The current proposals seemed to include consideration of greenspace that is man-made and not natural.

Existing national greenspace datasets are unlikely to be accurate in terms of naturalness, and locally collected data will be needed to develop this, for which resources are limited or unavailable within local authorities – both for initial data collection and for keeping datasets up to date.

Further work is required on how ANGSt works alongside other similar existing standards for access to greenspace such as those developed by the Woodland Trust and National Fields in Trust.

If the standards in time become more embedded in the planning process, Natural England should note that “Local Green Space” is a specific designation possible for sites within Local Plans. A different term for the ANGSt threshold may be more suitable to avoid confusion or conflict.

Comments on the proposed updates to ANGSt themselves

The new thresholds (Doorstep/Neighbourhood) do offer a useful new focus on having greenspace closer to people's homes – although Doorstep and Local are very close in terms of distance threshold and more consideration of whether there is a useful and realistic distinction to be made should be made.

Despite the new thresholds these measures are still likely to leave very local/smaller scale greenspace unrecognised (i.e. <0.5ha) – this sort of area is still important for public health and social interaction, as well as offering means to provide small scale planting within dense urban areas, such as pocket parks which can provide localised biodiversity support, flood risk reduction as well as recreational space.

Amongst the benefits of local small scale areas of public green space is the ability to provide space for children to play which is of particular importance in some of our denser urban areas where access to private garden space may be limited or non-existent.

Although we recognise that the addition of more local thresholds provide useful new detail in terms of local greenspace, Natural England should consider whether the expanded range of

thresholds now presents a too complex and onerous set of standards, which makes analysis more burdensome. Rationalisation of some of the larger scale/more distant thresholds could be appropriate to address this.

UGF

The impact of UGF will depend on how it is treated within the Standards Framework. Its inclusion in the Standards Framework could help local authorities in ensuring that any local policy around urban greening within development is followed. The option for local authorities to incorporate into Local Plans without greater support in national planning policy may not be sufficient to see its use realised at a local level.

As noted in the guidance, UGF may not be relevant to some authorities in our region that are more rural in character, with less dense urban area within their boundaries.

As a result, Natural England will need to develop thinking around how UGF and other standards such as ANGSt and others) will work together and how they should be used in different context - with better guidance to authorities on how they should be used. The potential for standards to work against each other needs to be considered in more detail.

We can see the potential for application of UGF to different types of zone proposed in the Planning White Paper. However, use of UGF may have unintended consequences – e.g. making it more difficult to work with developers to contribute to joint greenspace assets rather than maximising greenery within a site where that is identified as a preferred approach by a local authority

General comment – on standards for GI

A quantity standard could be beneficial in identifying deficiencies at a high level e.g. threshold around of ha of green space accessible per 1000 population which could be used as a check for planning applications for areas with overall deficiency

The comparison between NGB, Ecometric and UGF provided in the current draft Standards Framework document is useful – but further detail – e.g. some idea of how each considers different ecosystem services - would be more useful.

Question 2.6: What is missing from the GIST document

Areas for strengthening or omissions from the document are captured in our responses above. Some key areas are:

- More detail on the proposed set of core standards beyond the ANGSt – and inclusion of an appropriate standard that fully captures the range of eco-system services provided by different types of green infrastructure provision
- Process Maps tailored for Upper tier/combined authorities

Question 2.7: How can we simplify and improve the GIST document

The full draft document could be made easier to navigate and may not be intuitive to all audiences. Although the proposal to allow users to switch between summary sections and the detail, we suggest amending the format to be structured more in line with a conventional document, with summary and detail information on each element located together. The summary sections could be combined to form a separate Exec Summary, with detailed sections forming the Main Framework document.

Question 3.1 –Usefulness of maps, data and Geographical Information (GIS)skills. a.) Please rate the following statements

	Strongly agree	Agree	Disagree	Strongly Disagree	Did not trial this
The mapping products are easy to use		X			
The range of mapping datasets provided is good			X		
Local GI mapping data are available which could enhance the data/maps provided		X			
The Story Maps are useful tools to communicate key messages on GI to decision makers		X			

b.) Please provide further detail or comments on the mapping products

The ratings above are based on the initial release of data provided by Natural England, ahead of the full data release *[to be deleted if there is time to consider the full data set and feedback]*

Our detailed comments on the mapping and data are provided in the separate survey response to Natural England.

Question 3.2 – Evaluation and Monitoring a.) Please rate the following statements.

	Strongly agree	Agree	Disagree	Strongly Disagree
As a result of the Trial, we will develop evaluation and monitoring plans for GI			X	
The draft GI Framework will help us evaluate our GI policies and delivery effectively		X		

b.) please provide further detail or comments on Monitoring & Evaluation

Development of a Monitoring and evaluation of GI is already included in our Green and Blue Infrastructure Delivery Plan. Monitoring and evaluation at local authority level will depend on local circumstances relating to Local Plans and other adopted strategy. Participation in the trial, the draft Standards Framework and the mapping and data release will help us develop our monitoring and evaluation approach, but the intention to undertake this preceded the trial.

Question 4.1 Trial outcomes. a.) Please rate the following statements

	Strongly agree	Agree	Disagree	Strongly Disagree
The guidance on how to develop trial objectives and MoS was helpful		X		
Setting objectives has been helpful beyond the GI standards trial project period			X	
We have met our trial’s objectives		X		
We have met our Measures of success		X		
The trial project been a catalyst for new or enhanced partnership working		X		
There have been GI achievements during the trial period, attributable to participation in the trial		X?	X?	
Using this GIST trial has helped with... (or will help in the future to) [please rate this for the next 7 objectives]				
Enhanced the understanding of GI with existing and new audiences		X		
Overcome barriers		X		
Address social and health inequalities		X		

Integrate Biodiversity-led concepts into GI		X?	X?	
Integrate GI into the wider policy agenda (health, housing, transport, economy etc)		X		
Create or improve existing policies, strategies or action plans to provide more and better quality GI in the future		X		
Helped identify how to influence decision making and greater investment in GI		X		

b. Please provide more detail or comments on the trial objectives and outcomes for your organisation (and stakeholders)

The achievements of the trial itself in terms of influencing and supporting current activities have been limited by the short timescales for the trial.

The trial has prompted the formation of a GIST Steering Group which has been useful in bringing together local authority and delivery partner officers from different policy areas, whose work relates to Green Infrastructure. This grouping and the relationships formed may have value for ongoing delivery.

The main achievement of participating in the trial has been the review of the LCR Green and Blue Infrastructure Strategy and Delivery Plan against the Principles of Good GI and the self-assessment checklist which will help inform future reviews to strengthen the Strategy and Delivery Plan.

Question 4.2 Benefits of participation - motivation & commitment a.) Please rate the following statements.

	Strongly agree	Agree	Disagree	Strongly Disagree
The time invested in the GIST trial was well worth the benefits gained from participation		X		
I would recommend other stakeholders to engage in the 2 nd tranche		X		
My organisation is committed to continue work on our trial objectives beyond Feb 2021		X		

b. Please provide more detail or comments on the benefits of your participation

Participation in the trial has enabled the Combined Authority and its local partners to have early sight of the draft national Standards Framework, and to influence its development. This will help us develop local GI policy in line with the good practice approaches identified in the draft Standards Framework, ahead of its publication.

Q 5.1. Please rate the following statements.

	Strongly agree	Agree	Disagree	Strongly Disagree
The purpose of the trial was clearly communicated		X		
The timing of the trial was about right		X		
The availability of information was good and timely			X	

Question 5.2 Please rate the following statements

	Too much/long	About right	Too little/short

Timing – length of trial period			X
Support from the contractor		X	
Support from Natural England		X	
Supporting documentation			
Interaction with other trial areas			X

b. Please provide more detail or comments on the answers in 5.1 and 5.2 (the trial process)

Apart from the main objective to review our Green and Blue Infrastructure Strategy and Delivery plan, the trial period was too short to allow the Combined Authority or its local partners to make use of the Standards Framework and its constituent elements in real life testing through application – for example following one of the process maps from start to finish, or use of the data and mapping to create outputs that could then inform investment decisions. These would be workstreams with longer timeframes.

In the timeframes available we were able to review at high level the content offered and provide feedback and comments based on a theoretical consideration of how it might be applied in practice.

As the mapping and data set provided the most practical/directly applicable elements of the Standards Framework it would be have been beneficial if this could have been provided earlier in the trial which would have allowed more meaningful evaluation of the products.

Question 5.3 Do you have any other comments or questions? (you may wish to clarify or expand on any points you made in the previous questions)

None

Question 6.1 We understand that you may wish to give these survey responses with full confidentiality assurance. We may wish to share your survey response with others. Can you give us permission to share your (full) response with:

	Yes	Yes, but only without the first section (personal details)	Yes, but only anonymised, in summary report , with no scope for attribution to me or my trial area
Natural England	X		
The GI Standards Steering Group(incl. statutory bodies)	X		
The GI Standards Advisory Group(incl. wider stakeholders)	X		
The other 9 GI trial projects	X		