

GM NATURAL CAPITAL GROUP DRAFT GMSF CONSULTATION RESPONSE

I am responding on behalf of the Natural Capital Group as Chair.

The NCG has had very positive engagement with the GMSF team in the development of the draft and has had a number of presentations at NCG meetings on the emerging GMSF and on the Natural Environment evidence base

The published draft GMSF and the Natural Environment Evidence base were the focus of a special NCG workshop on 30th November 2016. This was attended by over fifty stakeholders from the NCG and other groups with an interest in the natural environment in GM. A full list of organisations that attended is attached at Annex1.

The workshop followed on from a similar event the NCG hosted on 20th November 2015 as part of the GMSF Issues and Options consultation. The outcome of that session was used to shape the NCG's response to that consultation. The NCG identified a number of key principles for how the GMSF should deal with the natural environment and green infrastructure and these were set out in the consultation response.

At the NCG workshop on 30th November 2016, delegates were asked to assess the extent to which the draft GMSF has taken on board those key principles. The outcome of the workshop is attached and constitutes the NCG response to the draft GMSF. The attached table presents the thirteen principles identified by the NCG in our previous response. These were all endorsed at the recent workshop and detailed comments on those are recorded in the table I have also pulled out a number of over-arching comments in this letter which are set out below.

It is clear that a lot of very high quality and detailed analysis on the natural environment has been carried out and this has been used to shape the draft GMSF. Workshop attendees acknowledged the excellent work done by GMEU in developing the Natural Environment evidence base emphasising the value of retaining this expertise within GM.

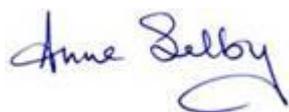
The City region has a long and distinguished history of demonstrating leadership through new (and sometimes challenging and radical) measures. They have a chance to do that once again through the GMSF, which presents a once in a generation opportunity to set out a bold vision for the natural environment and green infrastructure in GM. The draft GMSF can be regarded as a good starting point but the NCG's view is that further work and clarity is required particularly around delivery and how progress is to be monitored and measured.

1. The draft GMSF needs to define the Green Infrastructure network and outline the steps required for its protection and enhancement through a Natural Capital based approach. This needs to recognise the value of our natural assets and the Ecosystem Services they provide including wider economic, environmental and social benefits.
2. There is a need to identify a range of clear measurable targets for the natural environment to sit alongside targets on housing and employment. These will enable progress to be measured and reported. Without SMART targets there is a danger that the draft GMSF's stated ambitions will become 'just warm words'. The NCG are keen to support the development of a set of natural environment targets for the GMSF.
3. The NCG support the ambition to create a high quality ecological network including the requirement to achieve a 'net gain in biodiversity' through all developments. As outlined above there is a need to quantify what that means at a site level and across GM. It is essential that site masterplans and planning guidance consider biodiversity and other environmental factors at the earliest stage so that site layouts are placed within their environmental context.

4. The work on identifying the strategic Green Infrastructure framework for GM is very comprehensive but the Ecological Framework needs to be progressed as a priority to protect and enhance the current network considering where new allocations are required to achieve this.
5. The importance of protecting all SBIs needs to be emphasised. It was noted that the draft plan does not set out a differential approach to Grade A, B, or C SBIs. The current indicator on positive management of SBIs should be taken forward as a key target and indicator for the plan.
6. Some concern was expressed about the overall amount of development which is leading to so many sites being allocated. Careful monitoring will be needed to sure that more commercially attractive greenfield sites are not brought forward before all appropriate brownfield sites have been exhausted. At the same time the biodiversity and environmental value of brownfield sites needs to be acknowledged and properly considered. It is not clear from the draft GMSF how the process of allocating sites for development has included consideration of intrinsic environmental value of sites.
7. It is important to ensure that development associated with the GMSF does not increase risk such as flooding and that the framework should provide the opportunity to take steps to reduce that risk through effective implementation of Green Infrastructure (including both green and blue infrastructure) through the planning system.
8. The Natural Environmental evidence base has identified the key strategic Green Infrastructure assets for GM; uplands, lowland wetlands, trees and woodlands, major parks and green spaces, river valleys and canals. These assets provide a range economic, environmental and social benefits and could form the basis of further Nature Improvement Areas or other initiatives to encourage the landscape scale approach to nature conservation in line with the 2010 Lawton Review and 2011 Environment White Paper.
9. It is important to note that Green Infrastructure includes both green and blue spaces and there are many areas of local importance which are not included in the strategic Green Infrastructure framework. The draft GMSF needs to set out an ambitious framework of targets for locally important greenspaces and other Green Infrastructure assets for the ten councils to take forward in their Local Plans. This should be part of work in the districts to identify their local green infrastructure network. The importance of considering the potential health benefits of greenspace is increasingly being recognised and needs to be factored in.

I hope these comments are helpful. The NCG will continue to work with GMSF team to help deliver further work required as we move towards the publication version of the GMSF.

Yours sincerely,



Anne Selby

Anne Selby, Chair, GM Natural Capital Group & CEO, The Wildlife Trust for Lancashire, Manchester and North Merseyside

ANNEX 1

NATURAL CAPITAL GROUP DRAFT GMSF EVENT – DELEGATE ORGANISATIONS

Anthesis (UK) Ltd
APEM Ltd
Bolton Council
Bury Council
Campaign to Protect Rural England
Canal & River Trust
City of Trees
CPRE Cheshire
CPRE Lancashire
Environment Agency
First Choice Homes Oldham
Friends of the Earth
GMCA
Groundwork
Groundwork MSSTT
Innovys
Manchester City Council
Manchester Metropolitan University
National Trust
Natural England
Manchester City Council
Oldham Council
Peel Land & Property
Ramblers' Association
Rochdale Council
RSPB
Salford City Council
Stockport Council
The Land Trust
The University of Manchester
The Wildlife Trust for Lancashire, Manchester &
North Merseyside
The Woodland Trust
Trafford Council
United Utilities
Wigan Council

ANNEX 2

NATURAL CAPITAL GROUP DRAFT GMSF EVENT – REVIEW OF KEY ISSUES FROM ROUNDTABLE DISCUSSION

Principle	Comments
<p>1. Conurbation wide aspirational standards which districts need to follow in their local plans. GMSF is an opportunity to be innovative and aspirational in its approach to the natural environment. Raised by Groups 1, 2, 3, 4, 5, 7</p>	<p>The GMSF should be clearly setting out GM wide natural environment targets, measures (i.e. metrics) and priorities which are supported by Local Plans ensuring that development does not treat the natural environment as a ‘nice to have’ optional duty. In order to deliver these targets there needs to be a much better mechanism for design and delivery at a local level through:</p> <ul style="list-style-type: none"> • Being broadly defined by GMSF policy with signposting to Local Plans on their roles and responsibilities for the take up of GI. • Translating the GI evidence base into policies, targets and actions that can work in practice i.e. how do we achieve biodiversity net gain beyond site based solutions? • Clarifying about what is needed from key stakeholders and why i.e. developers and infrastructure providers through implementation/delivery manuals/strategies to build on the policies. • Identifying corridors and connections within strategic sites as well as local needs for open space and recreation take into account the special features of a site. • Identifying areas outside the strategic GI network boundaries and those at a local level, which are important but do not necessarily fit into the strategic ‘network’. • Developing ambitious master plans for individual allocations such as an SPD • Effectively monitoring implementation of policies and their impact at a GM and local level e.g. nature conservation with relevant indicators that measures ‘biodiversity net gain’.
<p>2. Promote a landscape scale approach to nature conservation in line with the Lawton Review (2010) – bigger, better, joined up Raised by Groups 2, 3, 6,7</p>	<p>The GMSF needs to take a landscape scale approach towards GI at a strategic level to allow cross-site and cross local authority boundary solutions. This would create opportunities for developers to contribute to wider GM aspirations and also enable long term environmental initiatives to be better supported e.g. River Valleys and Nature Improvement Areas. It would also enable integration between greenbelt and brownfield sites in terms of choices on development and GI enhancement.</p> <p>The relationship between the GMSF (Strategic Issues) and the Local Plan (Local Issues) will be important to avoid fragmentation. Natural environment policies need to be consistent and consider deliverability/monitoring as well as longer term benefits and the contribution it can make to economic growth. The GMSF needs to provide the necessary ‘hooks’ for local plans to address GI and align with other cross sector priorities such as building standards and energy efficiency, health, climate change, SUDS/above ground options, low carbon solutions and green roofs.</p>

<p>3. Define what constitutes GM's green infrastructure network and which Eco System Services it is providing. Network should cover GI which is strategic and/or crosses district boundaries. Raised by Groups 1, 2, 3, 5</p>	<p>Embedding ESS and natural environment principles needs to be a priority in delivering growth, ensuring linkages across the wider strategy and beyond i.e. GMS2040. The GMSF needs to define the GI network and its protection/improvement through a Natural Capital based approach and the value that its Ecosystem Services provide, taking into account:</p> <ul style="list-style-type: none"> • Quantity, quality and accessibility to natural assets. • Benefits including biodiversity, recreation, health and air quality, economy, water, climate resilience. • Short-term costs versus long-longer benefits with best options for enhancement using valuation techniques and realistic land values. • Leading by example and changing traditional mindsets using examples of how/where it has succeeded. • Joining up developer contributions with public investment or other bolder options, raising awareness of possible cost savings and opportunities in the use of public land. • Identification/enhancement of supra LA area frameworks to deliver ESS. <p>The 'white' elements of the green infrastructure/open space need be mapped with current assets to identify opportunities for biodiversity net gain alongside development opportunities including priorities and proposals for mitigation and impact of development of close by. The GI map is good however it doesn't show usage and value by people, (particularly in relation to the 'white' bits).</p> <p>GI is an important component of creating a quality place / neighbourhood and attracting inward investment. The GMSF needs to link environmental enhancement to health and economic growth so that it becomes business as usual within the policies.</p> <p>Quality of the landscape has not been addressed and needs to consider landscape character areas, views from the national Park, National Character Areas produced by Natural England.</p>
<p>4. High level of protection for national and locally designated sites (SBIs) and protected species and habitats that contribute to GMS biodiversity and landscape quality. Raised by Groups 2, 6</p>	<p>The robustness of allocations is critical and need to be clear and consistent across GM. There is a good level of research and evidence but the existing reference to 'enhance where possible' is too vague/optional with sites lumped together and no sense of priority. The GMSF does not discuss a hierarchical approach which is important but not at the expense of lower-ranking assets that may provide important links between higher-priority assets.</p>
<p>5. Need to include European designations. Are there other land management designations which could be used –</p>	<p>European sites are protected by national & local legislation as well so their protection should be joined up. Are there more important reasons than national & local covered by Habitat Regulations?</p>

Environmental Stewardship areas? Raised by Groups 2	
6. Need to identify the most important areas which should receive the highest level of protection. Will there be a hierarchical approach regarding levels of protection? Raised by Group 2	The NPPF suggests this and is linked to the response to Principle 4 which should be developed first.
7. Recognise that brownfield land is also important for GI / Eco System Services 8. In some cases losing green belt may be preferable to losing other land of higher value in GI / ESS terms. Raised by Groups 1, 2, 3, 6	<p>The approach towards brownfield land needs strengthening to recognise the protection of our natural assets. Rather than 'lose' high value brownfield land we need to look at sites in relation to other uses such as green infrastructure, open space provision, energy uses. The GMSF also needs to consider Green Belt loss as location is important.</p> <p>Principles 7 and 8 are inextricably linked and transparency is required around deliverability through a Natural Capital approach as this does not necessarily respect administrative boundaries. The GMSF will need to consider net social and environmental impact and DEFRA is currently looking into this working with local planning authorities. There is also a think tank looking at the economic value of woodland.</p> <p>As stated in the response to Principle 1 there needs to be a much better mechanism for design and delivery of GI at site/allocation level. Principle 2 also refers to the need to take a landscape scale approach towards GI at a strategic level enabling enable greater integration between greenbelt and brownfield sites for GI enhancement.</p>
9. Need to include specific reference to ecological networks which may partly overlap with GI but are important in their own right. Raised by Group 1	The GMSF has not done this.
10. Reduce fragmentation of the ecological networks and identifying where new sites are required to achieve this. Raised by Groups 1, 2, 6	As stated in the responses to Principles 2 and 8 the GMSF needs consider allocations of new open space/Green Infrastructure and their benefits at a local and GM level as well as how it can be delivered.
11. Corridors and connectivity between greenspaces are important and the GMSF is an opportunity to define these and	The GMSF needs to protect and improve the current network of corridors and connectivity so they are accessible to people. Smaller accessible green spaces also need protection as they provide a number of wider social benefits such as health. As stated in the response to Principles 2, 7 and 8 the GMSF needs to take a landscape scale

protect/enhance them more effectively. Raised by Groups 2, 3, 5	approach towards GI at a strategic level to allow cross-site and cross local authority boundary solutions.
12. Take a river valley approach, defining areas and assets by the river valley network which cuts across district boundaries and focus on river valley catchment plans. Raised by Groups 1, 2, 3, 7	River valley networks can play a vital multifunctional approach in terms of water quality, flood risk, wildlife corridors, aesthetic value which can be increased by deculverting river/canals and opening these up. As stated in the response to Principle 3 the GMSF needs to define the GI network and its protection/improvement through a Natural Capital approach and the value that its Ecosystem Services provide.:
13. GM wide standards for greenspace (eg woodland access standards, accessible natural greenspace, etc.) Raised by Groups 2, 4, 7	The GMSF does not set a GM-wide standard or promote a network of greenspaces particularly where there are notable deficiencies in terms of accessibility. Questions raised over whether there should be inter-district biodiversity offset processes and whether this would that create a risk of losing locally significant GI assets as gains go elsewhere?
Other Issues	
Challenging economic growth forecasts	If lower growth is appropriate, it would have an impact on the spatial distribution of allocations, as less greenbelt development would be justifiable.
Cross sector priorities including low carbon and health	The GMSF needs to consider how GI links with other priorities such as carbon reduction, health and sustainable travel. There is evidence around solar and wind assets set out in the GM Energy Study and there is an opportunity to link together. Employment targets should include targets for green jobs.