

Issues paper

for

Suffolk Coastal Green Infrastructure Strategy

May 2011

Final

Quality control

Issues paper

for

Suffolk District Council
Green Infrastructure Strategy

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1 Introduction

Scope of the paper

- 1.1 The need for this issues paper was identified in parallel with the production of the extended Green Infrastructure Strategy for the area of Suffolk Coastal not covered by the Haven Gateway Green Infrastructure Strategy (HGGIS) completed in 2008. Development of the brief for the extended Suffolk Coastal Green Infrastructure Strategy (Part 1) brought realisation that the character of the extended area was very different from that of the HGGIS area (more rural, less populated, less-well connected, reduced opportunities and necessity for development etc.) as well as the economic and political environment having changed since 2008. The drivers for development of a green infrastructure strategy at a local level (to inform development of the Local Development Framework (LDF), identification of smaller local projects etc.) are also very different.
- 1.2 Preparation of this green infrastructure issues paper for the whole Suffolk Coastal District Council area (Part 2)(including the extended area covered in the work outlined in Part 1) is therefore designed to review key changes since production of the Haven Gateway Green Infrastructure study in 2008, such as:
 - 1.2.1 the distribution for development
 - 1.2.2 the finalisation of the countywide landscape character assessment
 - 1.2.3 the relationship of deficiency areas in relation to population at parish level both now and in the future
 - 1.2.4 opportunities for refinement of areas of priority for new green infrastructure including project prioritisation
 - 1.2.5 review of any limitations in the scope of the mapped datasets and the resultant deficiency mapping. e.g. the use of ANG criteria and standards to guide dataset selection and standard setting
- 1.3 In addition, in relation to both Parts 1 and 2 of the study, consideration has been given to the potential impact and opportunities that may arise in relation to green infrastructure requirements and provision should the government decide to confirm Sizewell as a site for additional nuclear power generation, depending on the publicly available information available at the time.
- 1.4 The potential benefits and opportunities that will arise from the regeneration of the Port are also identified although it is understood that these opportunities cannot be realised unless there are improved transport links between the port and the regional major road network.

2 Context changes

The Localism Bill (2010)

- 2.1 The Localism Bill currently before Parliament proposes a major transition of power from central and regional government to the local level. It is a very wide ranging Bill which when linked with the reductions in public sector spending will see major changes in how services and facilities are provided. This will inevitably impact on how open space is provided and maintained in the future. With most major new open space provision provided in conjunction with new home provision, changes proposed to the planning system will be important in this regard. Notably, the Local Development Framework Core Strategies will effectively be given enhanced status, sitting as they will between national policy guidance and new neighbourhood plans. Neighbourhood Plans will be required to be in accordance with the Core Strategies i.e. they cannot propose less, but could provide more housing than set out in the relevant Core Strategy.
- 2.2 The Localism Bill also includes provision for a number of other measures which are of relevance to this study:-
 - Abolition of Local Area Agreements – helped set targets at a local level which could include targets in relation to green space or wildlife sites.

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- Introduction of Community Right to Buy. When listed assets come up for sale or change of ownership, community groups will have time to develop a bid and raise money to buy the asset. This could include greenspace assets.

2.3 Introduction of Neighbourhood Plans. Provides a route to indentifying, protecting or enhancing green space and green infrastructure at the local level.

Planning Policy Statement 12: Local Spatial Planning (2008)

2.4 PPS 12 introduced the responsibility on a local planning authority to ensure their core strategy is supported by evidence of what infrastructure is needed to enable the amount of development for a proposed area. This specifically makes mention of the role of green infrastructure, and so gives explicit support for the development of strategies for conservation and enhancement.

2.5 The infrastructure planning process is deemed to include, as far as possible:

- infrastructure needs and costs;
- phasing of development;
- funding sources; and
- responsibilities for delivery.

The Regional Spatial Strategy (RSS), East of England Plan (2008)

2.6 The Localism Bill re-confirms the Government's intention to abolish Regional Spatial Strategies (RSS). The RSS would therefore no longer form part of the development plan. However, evidence used in the preparation of the revoked Regional Spatial Strategies still counts as a 'material consideration' for development control purposes depending on the actual case.

2.7 The Government specifically identifies that local authorities should continue to work with each other, with partners and communities, on conservation, restoration and enhancement of the natural environment, drawing on available information, including data from partners, to address cross boundary issues such as the provision of green infrastructure and wildlife corridors.¹

LDF Interim Core Strategy and Development Management Policies, DPD, Interim Planning Policy; Suffolk Coastal District Council, June 2010

2.8 In March 2010, Suffolk Coastal District Council adopted the Core Strategy as Interim Planning Policy i.e. it became a material consideration in the determination of planning applications. The Core Strategy sets out in strategic terms the Council's overall approach to future development across the district until 2026. The District Council's vision for Suffolk coastal is that it should be a place where people 'want to live and invest, care for others and the environment'.

2.9 Due to the proposed changes to the planning system, and in particular the intention to abolish the regional spatial strategies, a review of the Core Strategy, has been initiated on the basis of local circumstances, statistics and aspirations. The review has resulted in a reduction in the number of new homes being planned, but with a commitment to an early review by 2015. Accordingly, an updated version of the Core Strategy has been produced (the Reviewed Core Strategy), which will replace the Interim Core Strategy in due course and progress to independent examination and formal adoption.

2.10 The key change from the Interim Core Strategy is in relation to the amount and timing of new housing now proposed. It adopts a more flexible approach than before, particularly in relation to the more rural part of the district, to reflect the potential for additional small scale housing growth through the Governments new Community Right to Build. This could have a consequent impact on the amount and speed with which green infrastructure can be delivered, particularly in key urban centres and market towns.

Countywide Landscape Character Assessment

2.11 Since the HGGIS was produced in 2008, a landscape character assessment has been completed at the county level in Suffolk. This provides an understanding of landscape character at the local level

¹ Revocation of Regional Strategies: letter from the Chief Planning Officer, CLG (July 2010)

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as opposed to the national Joint Character Assessment promoted by Natural England. This local assessment has been carried out jointly by all the District Councils and the County Council, and is designed to support work to maintain and restore the landscape of Suffolk, particularly through the planning system.

- 2.12 The project has assessed the landscape of the county and identified thirty distinct types of landscape within it, thirteen of which are found in the extended study area, and the rest in the Haven Gateway area. For each type, descriptions are given for the location; geology, soils and landform; land holding and enclosure patterns; settlement; trees and woodland cover; visual experience and condition. Landscape guidance notes have also been developed. These highlight some of the key issues of development control and land management for each of the types.
- 2.13 Landscape character provides a tool for identifying the distinctive and characteristic features to conserve or enhance as part of green infrastructure improvement, and is particularly valuable in guiding landscape scale projects.

Community Infrastructure Levy (CIL)

- 2.14 In April 2010, the Community Infrastructure Levy Regulations 2010 came into force. The CIL will apply to new development once the Core Strategy has been adopted. These new regulations include benefits for the local community, such as infrastructure improvements to the neighbourhood. In November 2010 the Coalition Government confirmed that the Community Infrastructure Levy, introduced by the previous Government would be continued but that the levy will be reformed to ensure neighbourhoods share the advantages of development by receiving a proportion of the funds councils raise from developers. These will be passed directly to the local neighbourhood so community groups can spend the money locally on the facilities they want, either by contributing to larger projects funded by the council, or funding smaller local projects like park improvements, playgrounds and cycle paths. These latter improvements could potentially make a significant contribution to green infrastructure provision at a local level, particularly in urban or urban fringe areas in the main growth areas of the Haven Gateway, rather than in the more rural parts of the north of the county. The local authority will need to work with environmental partners and local groups to promote the vision for the district wide green infrastructure strategy to ensure there is buy-in at the neighbourhood level.

New Homes Bonus

- 2.15 The New Homes Bonus is a new scheme that will provide the incentives and rewards for councils and communities who wish to build new homes in their area. Government has set aside nearly £1 billion over the Comprehensive Spending Review period for the scheme, including nearly £200 million in 2011-12 and £250 million for each of the following three years. Funding beyond those levels will come from formula grant. It is hoped that this change to the system - by rewarding councils for new homes - will be more effective than top-down regional targets.
- 2.16 The scheme will "match fund the additional council tax for each new home and property brought back into use, for each of the 6 years after that home is built with an additional £350 for each affordable home.²" It is hoped that local communities will see the benefits of growth through housing development rather than just the additional costs and pressures on infrastructure and services. The New Homes Bonus scheme will commence in April 2011.

LEPS and Regional Grant Fund

- 2.17 Local Enterprise Partnerships (LEPS) are the organisations that are nominally going to replace the Regional Development Agencies (RDAs). They will be partnerships between local authorities and businesses and will aim to play a key part in promoting local economic development. LEPS will have a key role in promoting and accessing the Regional Growth Fund (RGF), which is a new £1.4bn 3 year Fund from 2011-2014 that will operate across England to stimulate private sector led sustainable economic growth and employment. Whilst all areas of England are eligible to bid for the RGF some parts of the country (particularly where there is currently high employment, low-levels of deprivation or a vibrant private sector) may struggle to demonstrate how they meet the

² Grant Shapps, Press release, 12 November 2010

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second objective of the fund. However, there is the opportunity that a large-scale development project with a substantial green infrastructure element could be supported in this way.

- 2.18 The local authority will need to work closely with both the Haven Gateway Partnership and 'New Anglia', the LEP for Norfolk and Suffolk which was given the go-ahead at the end of 2010, to ensure that key major developments with the potential for support under the Regional Growth Fund, deliver on green infrastructure benefits too.

3 Strategic development opportunities for Green Infrastructure provision

Felixstowe Port

- 3.1 Felixstowe is the largest container Port in the UK and dominates the town's economy and use of land, but does not connect with the wider town physically, socially or economically as strongly as it could. The 'South Reconfiguration Scheme'³ includes land located within an 'Area of Outstanding Natural Beauty' (AONB). Land to the north west of the site, outside the Docks Acts boundary is defined as Heritage Coast. To the south, adjoining the boundary of Felixstowe South is Landguard Fort, which is a Grade 1 'Listed Building' and 'Scheduled Ancient Monument'. The opportunity exists to conserve and enhance the setting of Landguard Fort through proposed mitigation works, including layout and construction of a new viewing area and of a new beach area, improvement of the access road and visitor facilities, the return of the area north of the access road to the Fort's surroundings and preserving the most important views of and from Landguard Fort.
- 3.2 Investigation should be undertaken to see if there are opportunities to further link the refreshed visitor facilities at the port with the beachside, the town and the greenspace beyond, particularly to the nearby project opportunities already identified in the HGGIS⁴, namely:
- Project 39 River Orwell to Mill River Green Corridor
 - Project 40 North Felixstowe Fringe Green Corridor
 - Project 41 Felixstowe ANG deficiency
 - Project 42 Trimley Marshes Extension

Sizewell

- 3.3 The draft National Policy Statement for Nuclear Power Generation identifies Sizewell, amongst others, as a site with the potential to accommodate a new nuclear power station. EDF Energy has nominated land to the north of Sizewell B power station as having potential for new nuclear build along with land to form a new access road to the north.
- 3.4 Both the nominated site and access lie within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and in close proximity to Natura 2000 sites as well as directly affecting part of the Sizewell Belts SSSI. Significant opportunities will arise should the development proceed given the need to mitigate the impact of any new build project of this scale in the AONB. Mitigation could include enhanced landscape integration, improved biodiversity, public access and recreational opportunities.

Eastern Ipswich Plan Area.

- 3.5 The southeastern part of Suffolk Coastal district borders the county town of Ipswich, which represents the largest employment centre in Suffolk, and is of regional significance. This area includes the area to be covered by the Martlesham Area Action Plan; the main urban corridor of Kesgrave, Grange Farm, Martlesham and Rushmere St Andrew; and the smaller settlements and countryside, which surround these core areas.
- 3.6 The proposed approach to development identified in the Reviewed Core Strategy & Development Management Policies⁵ includes the opportunities to enhance the green infrastructure network through:

³ Hutchison Ports (UK) Limited Felixstowe South Reconfiguration Planning statement, November 2003.

⁴ A Green Infrastructure Strategy for the Haven Gateway, The Landscape Partnership for the Haven Gateway Partnership, 2008.

⁵ Reviewed Core Strategy & Development Management Policies, SCDC, 2010

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- the provision of advanced planting and landscaping to create new settlement boundaries that blend with the surrounding landscape;
- the retention of the designated Sandlings areas on the edge of Ipswich for their historic and biodiversity interests;
- the preservation and enhancement of environmentally sensitive locations within the Eastern Ipswich Plan Area and its surroundings; and
- maximisation of opportunities to achieve access to green space, including the countryside.

Land east of A12 adjacent Adastral Park

3.7 This area within the Eastern Ipswich Plan area is identified as being suitable for accommodating strategic levels of housing growth. The Core Strategy is proposing 2,000 new homes together with associated services, facilities and open space provision on land south and east of Adastral Park. The aim is to provide a self contained community, but with pedestrian and cycle path networks to link to new open space provision and the countryside. In addition, mitigation of the impact on the AONB would include green infrastructure opportunities such as strategic landscaping, identification and enhancement of areas of biodiversity and geodiversity interest, improvement of access to and impact on the countryside and improved visitor management in relation to the estuary. Development in this location offers the greatest opportunity for new open space provision.

Foxhall Tip

3.8 In addition it is known that the Foxhall Tip is due to be restored to a country park and there are other green infrastructure opportunities nearby, which could provide a network of green spaces around the more urban area between the Ipswich boundary and the Adastral Park site.

Felixstowe with Walton

3.9 Felixstowe with Walton has a role as a tourist destination, and forms a major centre in the Suffolk Coastal Settlement Hierarchy. Further housing growth is proposed in support of economic opportunities linked to the port, across a range of sites. The supply of housing land in the mid-long term, will require 'greenfield' releases close to the existing urban areas of Felixstowe and the Trimley villages, which will throw up opportunities to create new green infrastructure and links at the urban fringe, links from town to countryside, as well as strengthening of existing landscape character and biodiversity value.⁶ The suitability of four areas for possible future housing development in Felixstowe has been assessed in relation to their landscape and visual capacity to accept this type of development.⁷ The Reviewed Core Strategy identifies how opportunities for both formal and informal recreation are important for Felixstowe. The retention and where possible enhancement of greenspace that exists will be important including access to green infrastructure in and around the town. In particular, the area of Landguard Common will be retained and developed in conjunction with Landguard Fort as a resource for both local recreation and access and for its potential for tourism.

Market Towns

3.10 The towns of Aldeburgh, Framlingham, Leiston, Saxmundham and Woodbridge offer a potential source of development land, particularly for housing. The reviewed Core Strategy identifies that from 2010 to 2027 the creation of housing units from all sources except windfall will be at least 1,520 new dwellings dispersed over the 5 market towns.

3.11 Aldeburgh contains few 'brownfield' opportunities capable of development. Flood risk and other environmental and physical constraints also restrict new 'greenfield' development opportunities. Scope for development within the town is therefore limited to small brownfield opportunities, and new green infrastructure opportunities, delivered through development, are limited.

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⁶ LDF Interim Core Strategy and Development Management Policies, DPD, Interim Planning Policy; Suffolk Coastal District Council, 2010

⁷ Felixstowe Northern Fringe Landscape and visual appraisal of land to the north of the A14(T) to assess suitability for housing growth, The Landscape Partnership, 2008

3.12 The reviewed Core Strategy identifies Framlingham as a thriving centre with few constraints to development, and capable of accommodating significant levels of growth. A significant 'brownfield' land opportunity exists at Station Road but more significantly, in the medium and longer term, new housing development opportunities will need to be provided on greenfield sites close to the town, which should provide opportunities for new green infrastructure, especially at the neighbourhood and district level.

3.13 Leiston is not limited in the same way as the other market towns by physical and environmental constraints, and new housing is proposed on a mix of brown and greenfield sites over the plan period. The greenfield sites, in particular, should yield opportunities for green infrastructure enhancement (see also paragraphs 3.3 and 3.4 Sizewell).

3.14 Future development at Saxmundham is proposed in the form of new housing provision through a mix of outstanding planning permissions and new greenfield allocations. A joint Area Action Plan for Leiston and Saxmundham is proposed to address these issues, and needs also to address the lack of green infrastructure at all levels within the town.

3.15 Woodbridge is the largest of the market towns, and is constrained in development terms by the A12 to the west and the Deben estuary to the east, the latter with its nature conservation and landscape designations but also with the associated risk from flooding. Woodbridge has limited opportunities to deliver new green infrastructure through development within the town itself, therefore, or beyond its boundaries.

4 Relationship of ANG deficiency areas to population distribution

Accessible natural greenspace (ANG)

4.1 The concept of Accessible Natural Greenspace (ANG) was developed by English Nature (now Natural England) in 2003 in their publication 'Accessible Natural Greenspace Standards in towns and cities'⁸. The concept was adapted by the Town and Country Planning Association in their publication 'Biodiversity by Design'⁹ as one of the ways of delivering green infrastructure to communities.

4.2 ANG plays a vital role in improving quality of life by providing access to informal recreation in a natural setting, thereby promoting healthy living and a sense of place. ANG also enables people to experience wildlife close to their homes and have everyday contact with nature; provides an educational resource; helps to ensure that urban areas function ecologically and that greenspace and wildlife is protected; and plays an important role in reducing pressure on more sensitive wildlife sites by providing an alternative attraction. Natural England believes that the provision of natural areas should be part of a balanced policy of greenspace provision.

4.3 Given its importance, it is thus essential that ANG provision in Suffolk Coastal District be addressed in the framework for future delivery of high quality green infrastructure over the next 20 years. Such information can then be used, together with the other baseline analysis, to identify opportunities to enhance ANG provision and to address any existing or future deficiencies. Delivery of new or enhanced ANG in the more rural areas of Suffolk Coastal District is likely to need a different approach from that in the more urban areas of the Haven Gateway to the south.

4.4 A number of definitions exist to describe what ANG actually is. For the purposes of the Suffolk Coastal Green infrastructure Strategy sites needed to comply with each of the following parameters:

- Be 2ha or greater in size. [Anything under 2ha in size was not to be included, as these sites would not have a significant impact at the strategic scale. However, consideration was to be given to strategic corridors created by the amalgamation of a number of sites each of less than 2ha in size]
- have a public right of access that is not subject to admittance, membership or subscription fees, and a security that such access will remain in perpetuity

⁸ 'Accessible Natural Greenspace Standards in towns and cities' English Nature, 2003

⁹ 'Biodiversity by Design: A guide for sustainable communities' Town and Country Planning Association (TCPA), London, 2004

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- have an access network that allows public infiltration across a substantial part of the site
- be positively managed for public access (as appropriate to the site)

4.5 The potential ANG sites needed also to comply with one or both of the following:

- have a natural or semi-natural land covering, e.g. a woodland or meadow
- be a park or other green space, with a significant part thereof managed for wildlife

Summary of ANG standards

4.6 Part 1 of this study¹⁰ identified how access to a range of sizes and types of ANG is recognised as being important in order to satisfy people's various recreational needs and aspirations including small neighbourhood sites that they might walk to for daily activities such as dog walking or play, with larger scale sites available (such as country parks) for longer walks, picnics, etc. It is accepted that people would be prepared to travel longer distances to use the larger, better-equipped facilities.

4.7 The following standards were used overall for the Suffolk Coastal District Council Green Infrastructure Strategy:

- 2ha+ of ANG within 300m of home – this has been termed the Neighbourhood Level
- 20ha+ of ANG within 1.2km of home – the District Level
- 60ha+ of ANG within 3.2km of home – the Sub-regional Level
- 500ha+ of ANG within 10km of home – the Regional Level

4.8 The deficiency mapping for ANG produced in the Green Infrastructure study demonstrates the following:

Neighbourhood level deficiency

4.9 At the neighbourhood level, deficiencies can be found across much of rural Suffolk Coastal, on the eastern margins of Ipswich, in large areas of Felixstowe, except along the coast where the beach and sea front provides a valuable resource. Deficiencies are also found at Wickham Market, Leiston, Saxmundham, and at Aldeburgh away from the coast. Framlingham is also wholly deficient, although there are a series of smaller linked sites at the centre of the town that arguably perform the function of a Neighbourhood level site. Thus most residents away from the coast are deficient at the neighbourhood level of ANG.

District level deficiency

4.10 At the District level deficiencies again occur along the eastern margins of Ipswich. About half of Felixstowe is provided for by the coastal facilities, as is most of Aldeburgh. However, Wickham Market, Leiston and Saxmundham are again totally deficient. Around 20-25% of the extended study area has District Level ANG coverage, due to the large areas of ANG at the coast between Minsmere and Walberswick, and also due to the Pound Farm site east of Framlingham, and Carlton Meres Country Park to the northwest of Saxmundham. However, Framlingham is again deficient at this level.

Sub-regional level deficiency

4.11 At the sub-regional level, the deficiencies for the urban areas are far less, with Felixstowe provided for almost totally by the coastal resource; the regional resources of Rendlesham and Tunstall Forests become accessible to the communities of Woodbridge, and the resources at Dunwich are accessible to the inhabitants of Leiston. However, Saxmundham and Wickham Market are again deficient at this level. Part of Framlingham now comes within the catchment of the Pound Wood site, however, managed by the Woodland Trust, but Halesworth, within the neighbouring borough of Waveney District Council, is deficient at this level.

Regional level deficiency

¹⁰ Suffolk Coastal Green Infrastructure Strategy, The Landscape Partnership for Suffolk Coastal District Council, 2010.

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4.12 At the regional level the deficiency map appears very different. The regional level areas of green infrastructure resource in Suffolk Coastal are at Rendlesham and Tunstall Forests, and the mosaic of sites at Dunwich Forest, Dunwich Heath, Walberswick Common and Westleton Heath. This regional ANG provides a resource to most of the eastern part of Suffolk Coastal from Halesworth and Saxmundham, down to the eastern fringes of Ipswich, at Kesgrave and Martlesham. The key urban areas that are not provided for at this level are Felixstowe, which does not have access at all to this level of resource, and the market town of Framlingham.

Population estimates

4.13 The latest estimates of the annual population for parishes and towns prepared by Suffolk County Council (SCC)¹¹ refer to mid-2008 and show that the population of SCDC increased by 9.1% between 2001 and 2008. The change in population by parish within Suffolk Coastal since 2001 shows an increasing concentration in the eastern margin of Ipswich (as with the rest of the town), and smaller market towns. Almost 60% of the population growth has occurred in Suffolk's towns, of which Suffolk Coastal District contains five, plus the resort of Felixstowe and the corridor extending east of Ipswich containing the built areas of Kesgrave and Grange Farm.

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4.14 At the parish level, the population of Rendlesham has grown by 74.7% and Kesgrave by 46.6% representing three out of four of the highest percentage increases in Suffolk in the period. Other significant net increases have taken place in Leiston, Rushmere St Andrew, Hollesley, Felixstowe, Trimley St Mary, Saxmundham, Framlingham, Melton, Martlesham, Foxhall, Ufford, and Nacton¹². The SCC report identifies that population change is usually led by extra housing, but areas with the largest population increase do not always correspond to the areas with the greatest number of extra homes. Kesgrave has seen the 2nd largest increase in housing stock in Suffolk County since 2001.

Population projections

4.15 The population projections are trend based, so they show the changes to the population that would occur if recent demographic trends were to continue. The rate and volume of growth indicated by projections developed by Suffolk County Council shows that Suffolk Coastal will grow by 34.2% by 2033. Suffolk Coastal has a shortfall of young adults aged 20 to 39 and a larger percentage of people in their fifties and 65 and over than nationally. This could impact on the character of green infrastructure in terms of ANG that is provided with more of a focus on accessibility for an older population rather than provision for youth or couples with young children.

4.16 Whilst there is no strict correlation between the increase in population and the increase in new homes, it is acknowledged that most new ANG will be provided in conjunction with new home provision. The following table provides a broad indication of where future housing development is proposed.¹³

¹¹ Suffolk trends 2009 linked paper Population, Suffolk County Council July 2010
¹² Estimate of total population of areas in Suffolk: population estimates, SCC, 2010
¹³ SCDC Reviewed Core Strategy November 2010

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4.17

| Area | Existing housing stock 2010 | % of new housing in Reviewed Core Strategy | Proposed total housing stock 2027 |
|----------------------------------|-----------------------------|--|-----------------------------------|
| Eastern Ipswich Plan Area | 21% | 31% | 22% |
| Felixstowe/Walton & the Trimleys | 24% | 23% | 24% |
| Market Towns | 20% | 20% | 20% |
| Key and Local service centres | 29% | 18% | 28% |
| Other villages and countryside | 6% | 8% | 6% |
| Totals | 100% | 100% | 100% |

4.18 The table below gives a snapshot of the existing ANG deficiencies in those parishes in Suffolk Coastal with the anticipated greatest increase in percentage of housing numbers between 2010 and 2027. This exercise has been carried out based on a desktop assessment of the deficiency mapping generated in the HGIS and extended study reports but no definitive measurements have been made. The categories of deficiency have been identified broadly as:

- Largely or wholly deficient.
- Partly deficient
- Scarcely or not deficient

| Parish in area of anticipated greatest housing growth | Existing ANG deficiency in SCDC parishes where greatest housing growth projected | | | |
|---|--|----------|--------------|----------|
| | Neighbourhood | District | Sub-regional | Regional |
| Kesgrave | Orange | Orange | Green | Green |
| Rendlesham | Orange | Yellow | Green | Green |
| Saxmundham | Orange | Orange | Yellow | Orange |
| Rushmere St Andrew | Orange | Yellow | Yellow | Orange |
| Framlingham | Orange | Orange | Yellow | Orange |
| Woodbridge | Orange | Orange | Yellow | Green |
| Felixstowe | Orange | Yellow | Orange | Orange |
| Leiston | Yellow | Yellow | Green | Green |
| Martlesham | Yellow | Orange | Orange | Yellow |
| Melton | Yellow | Orange | Green | Green |
| Foxhall | Orange | Orange | Yellow | Orange |
| Trimley St Mary | Orange | Orange | Orange | Orange |
| Purdis Farm | Yellow | Green | Green | Orange |

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| KEY | |
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| Largely or wholly deficient | |
| Partly deficient | |
| Scarcely or not deficient | |

- 4.19 The general picture shows that in the parishes where housing growth is projected, most are already largely or wholly deficient in ANG at both the neighbourhood and district level. It also flags up the role large regional ANG such as Rendlesham, Tunstall and Dunwich Forests play in areas of housing growth, not just at a regional level, but at the sub-regional level too.
- 4.20 This analysis demonstrates the need for any future developments to make provision not only for the projected additional households but also to try and meet some of the current deficiencies that have been identified.
- 4.21 Further analysis of ANG deficiency at ward/parish level both now and projected to 2033 (or as required) could be undertaken on a parish to parish basis across the district, perhaps in conjunction with the government's neighbourhood planning programme, to refine understanding of local needs.

5 Green infrastructure project prioritisation

- 5.1 Whilst the HGGIS and Green Infrastructure strategies identify a range of strategic projects that can meet the deficiencies identified by applying the ANGSt standards across Suffolk Coastal, additional criteria could be applied in order to refine project priorities, and ensure 'fit' with the Green Infrastructure vision and strategic principles.

Use of project selection criteria

- 5.2 As a supplement to quantitative standards, the strategy principles could be used to identify a set of benefits and indicators against which project opportunities could be tested to see if they fit the strategic direction for green infrastructure in the district.
- 5.3 The tool can be used as a simple checklist where projects are evaluated on a 'yes/no' basis and against which the outputs of the project can be measured on a qualitative basis or a more complex quantitative tool could be devised in order to produce an absolute score and ranking of individual projects.
- 5.4 Using this approach a project that delivers against ANG accessibility and PPG17 quantitative deficiencies in a parish/ward with a trend of increasing population, as well as delivery biodiversity and heritage benefits would rank as a higher priority than one that delivered biodiversity and heritage benefits but was in a parish or ward which was already well-served by ANG through other sites.

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5.5 The indicative checklist below illustrates this approach.

| Green infrastructure: indicative project priority assessment criteria | | |
|---|--|--|
| Green infrastructure principles | GI Benefit | Indicator used to measure principles' objective |
| Champion the role that green infrastructure assets play in delivering quality of life | Local Image Economic contribution Increased awareness | Businesses/community groups/visitors/ organisations engaged |
| Integrate the approach to green infrastructure provision and management; provide recreational opportunities and maintain and enhance the natural and historic environment | Health | Distance of site from area of ANG deficiency |
| | | Health indices |
| | Ecological restoration | Improved outcomes for BAP habitats and species* |
| Create green infrastructure that reinforces ethos and character | Sense of Place | Enhancement to site or setting of identified heritage feature |
| | Ecological restoration | Enhancement to designated ecological site or buffer |
| | Local image Integrating communities | Enhancement to key landscape character feature (s) Distance of project from 'Green Flag' site |
| Increase everyone's understanding of, and ability to take action for, green infrastructure | Employment | Jobs created/safeguarded** |
| | Community Capacity Building | Adults gaining basic skills/full level 2/skills development |
| | Education and Learning | Community Participants working in environment |
| | Increased awareness | School visits/activity days |
| Ensure that sustainability issues are considered e.g. in construction, location, use and management | Adaptation to climate change | Project in Flood risk zone |
| | Ecological restoration | Project assists reclamation of Brownfield land |
| | Air quality | Project in Air Quality Management Area |
| | | Project Contributes to Travel Plans |
| Integrate green infrastructure provision and management into development proposals | Health Adaptation to climate change Sense of Place Economic benefit | Project mitigates deficiency identified in local PPG17 green space standard (LTP for cycle-ways) |
| *Other ecological indicator options could include SSSI land moving from unfavourable to recovering or favourable status or the hectares of habitat in active management | | |
| ** The Green Flag Award Scheme recognises well-managed, high-quality green spaces in the UK. It is run on behalf of the Department for Communities and Local Government by the Green Flag Plus Partnership (Keep Britain Tidy, BTCV and GreenSpace) | | |

6 Green infrastructure appraisal at a district level

Quantitative standards

6.1 The ANGst standards, identified in section 4.6-4.7, are accessibility standards that provide distance thresholds to provide communities with reasonable access to a green space resource. They do not provide information on how much of the resource is needed based on the overall population size.

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PPG17 Open space, Space and Recreation¹⁴ advises that appropriate quantity standards should be determined as part of open spaces assessment based on analysis of existing quantity provision evaluated in the light of local community views as to their adequacy, and appraised against a background of objective assessment and benchmarking. This form of community needs assessment is needed in order to identify needs at a local level that are specific to 'place'.

- 6.2 Within Suffolk Coastal, quantitative standards for green infrastructure could be established as part of an overall PPG 17 assessment or as a standalone exercise. Suffolk Coastal District Council has already carried out a study at a parish level on what recreational provision is needed for new dwellings. This strategy¹⁵ identifies a quantitative standard for children's play space of 0.7ha/per 1000 population and for sports grounds of 1.7ha per 1000 population in the provision of new dwellings. These standards are based on community need identified through the use of an annual parish survey.
- 6.3 Identified deficiencies in quantity standards can be used to inform how much, if any, additional accessible natural greenspace is needed, as opposed to where it should be located, which is informed more by the accessibility standards (ANGSt). Standards could be varied across the district based on groupings of parish or ward boundaries related to urban or rural character in order to further refine local need.
- 6.4 Where quantitative standards are still to be determined for different typologies this could be established through:

Community questionnaire:

6.4.1 The Community Questionnaire is particularly important in identifying:

- The types of accessible natural greenspace people use and how frequently.
- Whether there is enough natural greenspace in people's local areas. This helps to inform the quantity standard.
- How far people travel to access natural greenspace and what form of transport they use. This helps to refine accessibility standards.
- Why people use open space and why not?
- The satisfaction levels people have with facilities in natural greenspace. This helps to inform a quality standard if required.
- What makes people feel safe in open spaces, if there are any access issues and what are the problems?

Distribution of questionnaire:

6.4.2 The questionnaire could be distributed in a number of ways:

- By making it available on the District Website so that it can be completed online.
- By carrying out street surveys
- Through holding of a series of facilitated community workshops or manned displays where the issues raised in the green infrastructure strategies can be flagged up and the questionnaire made available for comment.
- A version for children and young people could also be made available.
- One to one consultation with key hard-to-reach groups could take place
- Promotion of the survey could be made through email/mail alert to all schools, parish councils, and allotment holders to inform them of the purpose of the study and the presence of the questionnaire before the web-link/displays go live.

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¹⁴ PPG17: Planning for open space, sport and recreation; CLG (2001)
¹⁵ Suffolk Coastal Local Plan, SPG 15, Outdoor playing space, parish schedule, 2009

- Press releases can be sent out to the local press and radio stations to promote the Community Survey.

Evaluation of community questionnaires

6.4.3 An analysis of responses would need to be carried out to find out if the local community thinks it has enough accessible green space, and in the right place and whether there are any accessibility or quality issues.

Benchmarking and standard setting

6.5 Before draft standards are applied, it is valid to carry out a benchmarking exercise with other authorities where appropriate standards have been set. It is also valuable to consult with district councillors to canvass their local views and knowledge of the local communities and to engage them in the process.

Differing standards for urban and rural areas

6.6 There are arguments that communities in rural areas cannot expect the same standards for open space and other recreation facilities as urban communities. PPG17: Planning for open space, sport and recreation¹⁶ is clear that ‘some local authorities may require both urban and rural provision standards...’ but ‘in other areas, the transition from urban to rural environments may not be so great that different standards are needed.’ Age and social structure of the local population, together with its distribution and the density of development will be factors in making judgements on whether the same or different standards are required.

6.7 Again, bench-marking can be carried out through the use of ‘comparator authorities’. The Chartered Institute of Public Finance and Accountancy (CIPFA) provides a ‘Nearest Neighbours Model’, to enable local authorities to undertake comparative and benchmarking exercises, by identifying the councils that are most closely related in terms of their demography and economic profile. This helps to test the validity of the choice of standard.

Case study: St Edmundsbury Green Infrastructure Strategy

6.8 In 2009, St Edmundsbury commissioned a green infrastructure study¹⁷ for the district in response to proposed future growth primarily at Bury St. Edmunds and Haverhill, as well as key service centres and likely future need in light of the growth within the borough, to inform priorities for new GI. It will also be used to support the delivery of spatial options within the Local Development Framework.

6.9 St Edmundsbury’s Open Space Assessment (2005) provides an assessment of the borough’s open space provision, and sets out recommended standards for the provision of green space, in terms of the quantity and accessibility of open spaces. The standard has been used for the analysis of greenspace provision per head of population, and for the development of recommendations for open space provision in future developments.

6.10 A standard for informal open space of 3.12 hectares per thousand head of population is set out in the Open Space Assessment (2005). This standard was validated by a telephone-based community survey. By applying this standard the consultants identified that provision in the southern, northern, north-western and central eastern parts of the borough exceeds the standard for informal open space. Four Wards were found to be within the most deprived percentile (<1ha / 1000population), however. This analysis has allowed strategic project proposals to be targeted on the areas of quantitative deficiency, as well as accessibility deficiency, as the ANGSt standard allows.

Role of smaller sites

6.11 The approach to the green infrastructure strategy at a sub-regional level uses a lower-end size limit of two hectares, a limit that derives from the Accessible Natural Greenspace Standard, first introduced by English Nature in the early 1990s, and recently reviewed and clarified by Natural

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¹⁶ PPG17: Planning for open space, sport and recreation; CLG (2001)
¹⁷ St Edmundsbury Green Infrastructure Strategy, final report, LUC (2009)

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England.¹⁸ Within any local area, there are many spaces smaller than two hectares, however, that can fulfil an ANG role including formal and informal open space, parks and gardens, amenity greenspace, and allotments (where these are not intensively managed) as well as smaller natural and semi-natural greenspaces.

- 6.12 Smaller green spaces offer opportunities for informal activities close to home or work, for example, informal play and dog walking. These spaces are often highly valued, no matter what their quality, and provide an opportunity for people to experience nature close to where they live. They can also be important in taking the pressure off more sensitive sites.
- 6.13 When it comes to district level PPG17 assessments¹⁹ the companion guidance recommends that all existing open spaces and sport and recreation facilities within the local authority's area should be audited as all forms of provision can contribute to meeting local needs. To avoid excessive use of resources, however, the guidance confirms that some councils set an agreed minimum size, typically 0.2 ha (which is the size of a mini-soccer pitch). This size of site is also easily captured and manipulated within a GIS-based mapping system. This same approach could be used for a district-wide Green Infrastructure strategy, and Suffolk Coastal may wish to review the lower-end size level at which the Green Infrastructure strategy applies in any future PPG17 assessment.
- 6.14 It is suggested that a pilot parish survey is undertaken, using a random sample of parishes, to identify the range of sizes of greenspace that are found, especially in the rural areas. This can then be used to define the lower level of site size for audit, or to inform where a grouping of smaller sites of the same typology could reasonably be defined as a single resource within a community.

Accessibility

- 6.15 Within the ANGSt model, accessibility is defined as the 'ability of visitors to physically gain access to a site'. Within the HGGIS the definition was tightened to cover sites where people 'have a public right of access that is not subject to admittance, membership or subscription fees, and a security that such access will remain in perpetuity'. This is the definition that has been used for the extended Suffolk Coastal Green Infrastructure strategy, so that sites with known access restrictions or no rights of access were excluded. Also excluded were sites where accessibility and naturalness were not clear from supporting information, aerial photography or internet searches.
- 6.16 When it comes to district level PPG17 assessments the companion guidance recommends, in contrast, that all existing open spaces and sport and recreation facilities within the local authority's area, irrespective of ownership and the extent of public access should be audited. Sites in private ownership, such as private woodlands, or historic estates, for instance, still have an important role to play in terms of their contribution to landscape character, biodiversity and heritage, even if the public cannot access them directly or that access is limited.
- 6.17 For the purposes of informing the LDF process, therefore, Suffolk Coastal may wish to look at how it appraises the role of important natural or semi-natural resources that are in private ownership or are accessible only to paying visitors in a future review of the strategy or through a PPG17 assessment.

¹⁸ Nature Nearby, Accessible Natural Greenspace Guidance; Natural England (2010)

¹⁹ PPG17: Planning for open space, sport and recreation; CLG (2001)

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7 Summary

- 7.1 Significant policy and economic changes have taken place at national, regional and local levels, such as introduction of the Localism Bill, the provision of the Community Infrastructure Levy Regulations, and the abolition of the Regional Development Agencies (RDAs) which could influence the deliverability of green infrastructure. At the same time, local knowledge of vital baseline information to green infrastructure, such as local landscape character has allowed better decision-making in relation to strategic and other project priorities.
- 7.2 Strategic development opportunities, largely within the Haven gateway sub-region, related to the port of Felixstowe, Sizewell, the BT Research and Development headquarters/Adastral Park, could yield significant new green infrastructure opportunities. These should be linked with existing strategic opportunities identified in the HGGIS. Other opportunities exist in relation to the proposed smaller-scale growth within the market towns.
- 7.3 There appears to be significant ANG deficiency, particularly at the neighbourhood and district levels in the parishes where the housing numbers are anticipated to be increasing the most. Further study at a local level is needed to identify exactly where these deficiencies are occurring.
- 7.4 Project priorities can be refined further by use of a project prioritisation tool based on criteria drawn from the green infrastructure principles developed in the HGGIS and adapted for the extended Green infrastructure strategy.
- 7.5 Quantitative standards could be developed for green infrastructure as part of a comprehensive PPG17 assessment or a standalone exercise to understand greenspace deficiencies in relation to existing and proposed population.
- 7.6 Sites between 0.2 hectares and 2 hectares could be evaluated to further identify shortfalls at a neighbourhood level or to identify where groups of smaller sites may be contributing provision in an area of apparent deficiency. A pilot parish survey should be undertaken first, using a random sample of parishes, to identify whether 0.2ha is a reasonable lower level of site size for the purposes of a district level audit in the rural areas.
- 7.7 Sites without full accessibility, whether because they are in private ownership or because users need to contribute financially before they can use them, need recognition that they still contribute to the green infrastructure network. Evaluation at a local level may also indicate their future potential to contribute to ANG deficiencies.

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