**Stoke Local Plan - Issues and options consultation 2020-2040**

***Excerpt from Issues and Options consultation:***

6.2 Infrastructure delivery

An Infrastructure Delivery Plan will be produced to address the issue of strategic off-site infrastructure that will be required over the life of the local plan to having regard to the wider cumulative impacts of development. The location and / or scale of residential and employment sites potentially has a significant impact on the ability of existing infrastructure to absorb additional development. To bring development forward it is necessary to address these strategic 'deficiencies' to reduce barriers to development through the provision of new or enhanced infrastructure. Funding for strategic infrastructure will be met from a variety of sources including developer contributions; government grant, funding opportunities and the council’s resources.

There is active and ongoing dialogue with key service providers (highways; education, health; social care; leisure; environmental; water; sewage and telecommunications). Digital infrastructure is also becoming increasingly important and will need to be considered within the Local Plan. Once it has been decided what the level of development growth is along with the identification of sites confirmed to support development, more detailed planning can be undertaken with these service providers and an infrastructure delivery plan produced to accompany the local plan.

We know that there are pressures on the strategic and local road networks; there is scope for more sustainable travel including rail, bus, cycling and walking and a growing population will place pressures on education and health and social care services.

Ensuring alignment of the infrastructure requirements with the national infrastructure programme and the priorities of the Stoke-on-Trent and Staffordshire Local Enterprise partnership is critical to development of the delivery plan.

**QUESTION 8: Do you consider that the Local Plan approach to infrastructure and funding is comprehensive?**

***SWT response:***

We feel that robust green infrastructure offers nature-based solutions to many resource issues, and is essential for a sustainable city. Key to this would be a good evidence base and a Green Infrastructure Strategy, to make sure environmental elements are delivered together for multiple benefits.

Partnership working is also a powerful way to draw in extra funding and expertise. The council should work with NGOs, business and community groups to help access further funding and support pro-active projects to deliver sustainable infrastructure.

***Excerpt from Issues and Options consultation:***

12 Natural Environment

**Background**

Stoke-on-Trent has a rich and varied network of green infrastructure defined as a strategic network of multi-functional green spaces which support natural and ecological processes and provide a wide variety of distinctive landscapes and functions which can play an important role in creating sustainable healthy communities. The city benefits from a high number of designated sites within the city, with 41 sites covering an area of 567.5 hectares being identified. Preservation and enhancement of the natural environment is a key requirement of national planning policy and is vital to ensuring sustainable development.

To protect and enhance the range of designated sites in the city, we are required by national policy to create local policies that can be used to assess any development on or affecting any relevant wildlife and geological designations. In doing so, we need to offer a level of protection to these sites that is proportionate to their status (i.e. whether they are an international, national or local designation) and their contribution to wider ecological networks. However, it should be recognised that even locally designated sites still make an important contribution to local ecological networks. We also have a wider duty to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.

To offer further protection to areas of environmental value, we are also required to direct development towards brownfield sites. It is therefore important to recognise that such brownfield sites can still be of high environmental value, and this needs to be taken into consideration in planning any future development.

12.1 Green Infrastructure

The city has a significant network of green infrastructure assets – including parks, open spaces and habitats, which provide an important resource for people and wildlife. Green infrastructure provides attractive environments for outdoor recreation and exercise; helping to create a sense of place; providing biodiversity and habitat enhancement opportunities; as well as presenting other environmental benefits such as assisting natural drainage to reduce flooding and help us adapt to climate change.

The Green Space Strategy assessed over 600 open spaces in terms of their quantity, quality and accessibility. This study found that the overwhelming majority of the City’s open spaces are identified as excellent, good and above average standard and that a significant percentage of spaces fall into the ‘above average’ category but are just falling short of good or excellent. These are open spaces that can be targeted for improvements. However, a number of the city’s open spaces are of a poor standard and recommended to be considered for major improvements or reconfiguration (including alternative land uses) where they have been identified as surplus to requirements.

Conversely, some open spaces could meet the criteria for a Local Green Space designation. Where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land. Local Green Space designations will be considered.

**QUESTION 36: How do we best manage our green spaces?**

***SWT response:***

* During the pandemic, the value of local greenspaces has really been brought into sharp focus. There is a growing body of scientific evidence showing that access to the natural world is greatly beneficial to physical and mental health and wellbeing. The provision of accessible greenspace is vitally important for the people of Stoke-on-Trent and in cases where greenspace has been identified as ‘poor standard’ within the Green Space Strategy, Staffordshire Wildlife Trust (SWT) would recommend that steps are taken to protect these green assets by encouraging community involvement in their maintenance and care.
* In addition to the climate emergency, we are facing a biodiversity crisis, with many wild species facing huge declines or even extinction due to threats to their habitats and habitat fragmentation. Staffordshire Wildlife Trust is keen to work with the council to improve the habitat quality across the city’s greenspace network. The Blooming Stoke and SUNRISE projects, run by SWT with Stoke City Council, have already delivered new wildflower meadows, river restoration and woodland management. Management of greenspaces to benefit biodiversity will also bring a host of other benefits to the city including flood reduction, air quality improvements and increased carbon sequestration.

**QUESTION 37: How can we make our green spaces more accessible?**

***SWT response:***

* There is an excellent report by Public Health England ‘Improving access to greenspace A new review for 2020’, which contains a wide range of recommendations on how greenspaces can be made more accessible, together with information on the multiple benefits for residents, including a range of positive health outcomes. Recommendations within this report, which Staffordshire Wildlife Trust supports, include for example:
* Carrying out a consultation among residents to identify some of the barriers to accessing greenspace
* Ensuring greenspaces have design features which enhance their accessibility such as well-maintained footpaths, signage, interpretation, benches and lighting
* Work with other organisations to maximise usage of greenspaces, eg. Staffordshire Wildlife Trust’s people engagement team, NHS green prescribing team etc

***Excerpt from Issues and Options consultation:***

Biodiversity and geodiversity are a vital part of the environment and provide a wide range of benefits. A core principle of the NPPF is that planning should help in conserving and enhancing the natural environment, minimising impacts on biodiversity and preventing the loss or deterioration of irreplaceable habitats such as ancient woodland.

Section 40 of the Natural Environment and Rural Communities Act 2006 places a duty on all public authorities in England and Wales to have regard to their function for the purposes of conserving biodiversity. A key purpose of the duty is to ensure that it is embedded and is considered integral to the formulation of local policies and in the determination of planning applications to help deliver the government’s long-term Environmental Plan.

National guidance requires all development sites to achieve a biodiversity net gain, and the Environment Bill will set a legal requirement for new developments over 0.1 ha to improve a site’s biodiversity value (in terms of habitats rather than species) by at least 10%. This can be calculated using a metric comparing the amount and condition of the habitat on a site before development and the amount of habitat and its condition proposed to be created and/or enhanced after development.

**QUESTION 38: How do we best meet our obligations in meeting biodiversity requirements?**

***SWT response:***

* With its network of urban greenspaces, canals and watercourses, Stoke-on-Trent has huge potential for biodiversity enhancement, and a connected tapestry of thriving green and blue corridors across the city would be attractive to both local residents and businesses looking to invest in the area.
* In order to conserve and enhance biodiversity in the city, Staffordshire Wildlife Trust would strongly recommend that Nature Recovery Network (NRN) mapping is undertaken in Stoke-on-Trent. A NRN map uses data on the biodiversity value of land within a particular area to pinpoint existing ecology ‘hotspots’ and corridors, along with strategic locations where habitat has potential to be improved further or connected to support greater biodiversity. Within Staffordshire, nine out of 11 local authorities have now commissioned NRN maps.
* Good baseline information is key to planning for nature, and helps avoid delays and issues later in the planning process. We recommend the plan and NRN is based on up-to-date ecology data, as laid out in the National Planning Policy Framework. This includes identifying Local Wildlife Sites, irreplaceable habitats such as ancient woodland, and priority habitats like ponds and brownfields of high environmental value. Much of Stoke’s green areas have not been fully assessed for their value. For example, Berryhill Fields is one of the largest open green areas in the city, but only about a quarter has any wildlife designation currently, and less than half is officially green space. Its full value and role in the network is not accurately reflected, as significant populations of protected and priority species such as birds and amphibians have not been considered. To direct development to the right places and strengthen nature networks, constraints and opportunities need to be found early on, especially in advance of any site allocation decisions.
* In addition to the a legal requirement for biodiversity net gain for habitats, on May 18, the Environment Secretary announced that the Environment Bill would also include a new legally-binding target for species for 2030, aiming to halt the decline of nature. Staffordshire Wildlife Trust is keen to work with the council to support them in excelling in the achievement of both of these targets. A Nature Recovery Map for Stoke-on-Trent is a crucial starting point – and would help the authority to make informed strategic decisions about development and growth while conserving and enhancing biodiversity. We also recommend the council consider adopting specific policy or supplementary guidance on biodiversity offsetting to help deliver biodiversity net gain.
* Biodiversity aims should also feed into a Green Infrastructure Strategy and implementation plan. This would allow all linked environment elements such as landscape, flood management and public access to be planned together.

***Excerpt from Issues and Options consultation:***

12.3 Trees and woodlands

Trees, hedgerows and woodlands are a vital part of the areas urban environment and provide a wide range of benefits. They contribute to the character of an area and function as wildlife habitat; provide shelter; carbon storage; cleaner air; flood alleviation and urban cooling as well as increasing the desirability of the area. Furthermore, there are many recorded health benefits such as, cleaner air, reduction in asthma and improvements to mental health. Therefore trees and woodlands are an important part of the local landscape and need to be managed accordingly.

Over the years, trees have been removed from street scenes and not been seen as being essential for developers to include within schemes. In view of the government's emerging policy for developers to provide street trees, the council intends to consider producing comprehensive guidance and engineering details in future documentation, specifying appropriate species, maintenance, geometric layout, and landscaping considerations. An option is to provide street trees and sustainable energy charging points on a utility verge/hard landscaping area adjacent to the highway.

**QUESTION 39: Do we need to continue to protect trees and have a progressive approach to the increased use of trees and woodland in developments within the city?**

***SWT response:***

Yes, trees are a vital part of urban landscape. However, new and existing urban trees should be conserved and planted in line with best practice for their long-term health, such as the Urban Tree Manual published by Forest Research (part of the Forestry Commission) https://www.forestresearch.gov.uk/tools-and-resources/fthr/urban-tree-manual/

New trees and other vegetation should be targeted in areas where air pollution reduction and urban cooling are required. Increased urban tree coverage could also be achieved alongside improved sustainable drainage, such as retrofitting of ‘rain gardens’ and roadside swales that return more rainwater into the ground. New tree planting should also avoid existing valuable habitats such as wetlands and meadows- surveying sites for constraints beforehand will be essential.

Trees and woodlands should not be the only specific habitat features of focus under the Natural Environment heading. Rivers and watercourses including canals are a key feature in Stoke, providing corridors for people as well as wildlife. Road verges and brownfield sites are also very important for a range of wildlife and urban greenspace in the city. Key habitats and natural assets should be identified and improved via a Green Infrastructure Strategy.

**QUESTION 40: Do you support the concept to provide street trees and sustainable energy charging points?**

***SWT response:***

Yes.

***Excerpt from Issues and Options consultation:***

13 Climate Change and Environmental Resources

Effective planning is an important part of a successful response to climate change as it can influence the delivery of appropriately sited green infrastructure and impact on the reduction in the emission of greenhouse gases. There is a statutory duty on local planning authorities to include policies in their local plan designed to tackle and mitigate the effects of climate change.

The government has taken a number of steps to limit the UK’s emissions of greenhouse gases through legally binding targets. As part of an international effort the UK has been signed up to the Kyoto Protocol since 1995 and in 2016 ratified the Paris Agreement. The 2008 Climate Change Act commits the government to reducing UK carbon dioxide and other targeted greenhouse gases by 100% in 2050 from the baseline 1990 levels.

One of the core principles of the NPPF is the use of renewable and low carbon energy resources. It indicates that planning has a key role to play in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable.

The council has declared a climate emergency in which the city resolved to set up a Commission to deliver an action plan to address climate concerns. The Council will work with others on carbon reduction and request resources to make a contribution to UK carbon reduction targets.

13.2 Climate change

The local plan will need take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications. There are a number of direct issues surrounding climate change which need to be addressed including; flood risk, water supply, biodiversity and landscapes and the risk of overheating from rising temperatures.

Climate change can be mitigated in a variety of ways. The way we plan and locate development is something that should be considered. When new development is brought forward in areas, care could be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure. For example, urban tree planting prevents the formation of heat island effects in urban areas, whilst simultaneously removing CO2 from the surrounding environment. New development could be planned help to reduce greenhouse gas emissions, such as through its location, orientation and design.

**QUESTION 41: Are there other measures that the Local Plan should include to address climate change and achieve the Government’s target to bring all greenhouse gas emissions to net zero by 2050?**

***SWT response:***

The local plan should support and help deliver actions identified in a Climate Change Strategy for the city. This should identify ways to reduce carbon emissions, adapt to predicted climate changes, and sequester more carbon. The current Sustainability and Climate Change SPD adopted in March 2012 should be reviewed and updated. Nature-based solutions can help deliver these aims, as well as improving the environment for people and wildlife. Some actions could include:

* Tackling places most at risk from climate change effects, such as summer heat island and air pollution ‘hotspots’, with green solutions.
* Retro-fitting sustainable drainage to increase flood resilience and help protect rivers and brooks.
* Identifying how carbon storage can be increased on council managed land, especially in soils and new habitat creation.
* Enhancing and creating new greenways to increase walking and cycling.

***Excerpt from Issues and Options consultation:***

13.6 Flood risk

There are a number of complex flooding issues across Stoke-on-Trent as it is at the top of the River Trent Catchment and there are some fairly steep river valleys which combined with the density of development and heavily modified drainage network in the city, can cause a rapid response to rainfall. The urban area is densely populated and in places, steeply sloping. This makes it prone to rapid surface water flooding following rapid rainfall and flooding from smaller watercourses that are tributaries of the river.

A new Strategic Flood Risk Assessment (SFRA) for the city provides a robust evidence base for considering flooding, including any future increases resulting from climate change. This will be used, along with other available sources, to identify areas at risk of flooding. The local plan seeks to direct development to areas at the lowest risk of flooding by setting out the sequential and exception test requirements across the city.

**QUESTION 45: How do we balance flood risk within the Local Plan against the need for development?**

***SWT response:***

Sustainable catchment management, natural flood management and sustainable drainage systems should be used to reduce flood risk. These principles involve mimicking natural drainage; encouraging water percolation and storage where rain falls, rather than collecting it. Sharing the load and slowing the flow avoids water building up in any one place and causing a bigger problem.

New developments must avoid flood zones, but also restore historically degraded and piped watercourses, and use best practice to manage rainwater. Green solutions can also be retro-fitted into existing problem areas as part of infrastructure improvements. SWT has carried out many successful projects including working with landowners along tributaries, restoring urban rivers, and creating new wetland features to soak up water. The Trust is keen to work in partnership with the council to support natural flood management in the city.