

Response from the Buckinghamshire and Milton Keynes Natural Environment Partnership (The "NEP") to the draft “Plan:MK” consultation document.

Link here: [Draft Plan:MK](#)

Summary

The NEP welcomes the recognition in the draft Plan:MK of the importance of green infrastructure (“GI”) and the incorporation of biodiversity in built development - for example in the reference in the vision and objectives to the “green, open and spacious layout”, the need for “easy access to open space”, biodiversity and “conserving and enhancing key landscapes and important habitats”. We also welcome reference to two of our strategic documents, “*Forward to 2020*” which sets out a Biodiversity Action Plan for Buckinghamshire and Milton Keynes; and our “*Vision and principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes*”. We also see that much of our standard response to Local Plans, submitted at the Issues and Options stage, and our recent work on Biodiversity and Green Infrastructure has been taken into account.

For example, we welcome in particular references in the biodiversity section to achieving net gain, to the use of the mitigation hierarchy, including avoidance first and offsite-compensation only as a last resort where all efforts to avoid or mitigate and compensate for biodiversity losses on-site are exhausted; and the use of an accounting metric to measure net losses or gains.

However, to strengthen opportunities to maximise benefits from biodiversity and GI, and to bring the draft Plan in line with recent strategies and work of the Buckinghamshire and Milton Keynes Natural Environment Partnership in the areas of biodiversity and green infrastructure in particular, the NEP advocates that the draft Plan should place more emphasis on the following areas:

- **Strategic goals for GI across county – Plan:MK to look to provide strategic-scale benefits, in addition to local Borough ones** - setting out clearly how the Plan will specifically support the NEP’s county-wide Vision for GI covering Buckinghamshire *and* Milton Keynes.

(NEP GI Principles 1, 8 and 9)

The need for early and strategic planning for GI needs at all scales, to provide multiple benefits for future residents. This involves identifying and taking into account existing GI and biodiversity features of importance, the functions provided by them and **looking strategically for opportunities for improvement** - including connecting to existing and potential networks beyond administrative and development boundaries, as well as enhancing, extending and protecting GI. We would expect this to include **specific mapping work** to identify existing key GI features of importance and the functions provided by GI; how best to link areas of GI given areas of growth and other pressures; identifying areas of GI deficiency and making sufficient provision through new / improved GI to meet access standards and maximise wider benefits; and actively seeking opportunities to protect, enhance, improve and connect. We would expect map should set out what MK aims to protect, provide for or improve and where, and

how this contributes overall to the Buckinghamshire-wide Vision for the Improvement of GI by 2030, including connected networks of GI showing the Vision for what MK aims to protect, provide for or improve and where.

(NEP GI Principles 2, 3 and 4; and Expectations for Local Plans - page 18)

- **A commitment to working cross-border with neighbouring authorities in both the planning and delivery-phase: an essential requirement to maximise the benefits of GI through growth and development** (in line with the NEP’s GI Principle 7 regarding the coordinating GI creation and improvement with activities and existing networks cross-border.)
(NEP GI Principles 6 and 7).
- **Recognition that GI is as important and necessary** for the health and wellbeing of Buckinghamshire’s economy, society and environment, **as grey (man-made) and social infrastructure.** *(NEP GI Principle 1)*
- **Contribute towards translating the future vision of GI in Buckinghamshire and Milton Keynes and the Principles for GI advocated by the NEP, to meaningful development and GI projects locally.** Focusing on protecting, improving and providing GI in line with the Principles will turn the vision into reality and create a multi-functional GI network in Bucks and MK that improves economic, environmental and quality of life benefits.
- **Commitment to long-term management of GI** in line with the definitions in the NEP’s GI Vision and Principles document. This requires developers to secure management for 25-30 years post completion, to ensure the quality, location and functions provided by GI, and during that time secure a mechanism to manage into perpetuity. *(NEP GI Principle 5)*
- **We would expect all of the NEP’s Green Infrastructure “Principles” to be applied to all spatial scales of development across the Borough.**
- **The need for ongoing monitoring of expected biodiversity gains and of GI improvement is undertaken** to ensure that what is promised is delivered; with remedial measures if not achieving satisfactory conditions within stipulated timeframes.
- **Reference to a forthcoming SPD on biodiversity accounting** to cover Buckinghamshire and Milton Keynes. This is an area of work that the NEP Partners are currently focusing on.
- While we welcome reference to design features to encourage **biodiversity in the built environment, more detail is needed on how this should be done**
(NEP GI Principle 8; also Appendix 2 of the NEP’s GI Vision and Principles document).
- **Recognition of the importance of priority habitats and species as well as protected habitats and species.** *(NEP’s “Forward to 2020” – Bucks and MK BAP)*

Our specific requested amendments to the draft Local Plan are detailed in the Table below, which summarises a working document that outlines areas of the Plan that the NEP welcomes as well as specific areas requiring strengthening.

Requested amendments

To bring the Local Plan into line with the NEP's Vision and Principles GI document and its standard response to Local Plans

NB – in making reference to the NEP's GI "Principles" document, the Table below (Table 1) summarises the overall Principles currently being approved by the NEP Board.

Table 1 – summary of NEP's GI Principles (referred to throughout response)

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| <ol style="list-style-type: none"> 1) Green Infrastructure is as important and necessary as grey (man-made, constructed) infrastructure and social infrastructure for the health and wellbeing of Buckinghamshire's economy, environment and society. 2) GI, its value and benefits are considered and planned for early and strategically at all spatial scales of development 3) Green Infrastructure across Buckinghamshire should be planned to provide a range of benefits, or "ecosystem services" 4) (Related to 3, above) GI creation and improvement is planned to contribute to the delivery of objectives and targets, good practice actions and activities for Buckinghamshire's environment, health and economy 5) GI is managed into the long-term 6) Connected networks of green infrastructure are necessary - at both the landscape and local scale - to maximise the benefits 7) GI creation and improvement is coordinated with activities cross-border 8) GI protection, improvement and creation is prioritised in locations where GI can deliver most benefits. Opportunities to maximise the benefits of GI should be explored both strategically, when planning for GI provision ahead of growth and development, and when mitigating the impacts of development 9) Linked and relevant to, informed by and co-ordinated with, other policy areas, strategies, activities and reviews. |
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The NEP's "Standard Response" to Local Plans is also referred to in this document, and can be found [here](#) on the NEP's website.

The NEP requests the following amendments are made in the draft Plan:MK to strengthen opportunities to maximise the benefits from Green infrastructure in the Borough:

Review of Plan:MK – [draft consultation document](#) June 2017 – against

- The NEP’s [Standard Local Plan Response](#) (Dec 2015);
- The NEP’s [Vision and Principles for the Improvement of GI in Buckinghamshire and Milton Keynes \(Sep 2016\)](#) and the
- NEP’s expectations for Biodiversity – from the <http://www.bucksmknep.co.uk/wp-content/uploads/2014/11/Bucks-BAP-Forward-to-2020.pdf> NEP’s “Forward to 2020” Biodiversity Action Plan and current work and expectations on biodiversity accounting.

Sections of the Local Plan reviewed:

- 2 Vision and objectives – pg 7
 - 3 Sustainable development strategy – pg 11
 - 5 Spatial delivery of growth: strategic site allocations – pg 32
 - 7 Sustainable construction and renewable energy – pg 76
 - 8 Managing and reducing flood risk - pg 83
 - 9 Biodiversity and geodiversity – pg 86
 - 11 Open space, leisure and recreation pg 103
 - 12 Design – pg 110
 - 14 Culture and community – pg 134
 - 16 Infrastructure Delivery – pg 163
- Appendix B Open space and recreation facility provision – pg 166

TABLE OF NEP’s COMMENTS ON DRAFT PLAN

Section	NEP’s comments	NEP’s supporting references: GI Vision and Principles Document And the NEP’s Standard Local Plan Response
2 Vision and Objectives		
<p>Vision for Plan:MK (Para 2.3, page 7); and</p> <p>Strategic objectives (pages 8 – 10)</p>	<p>Welcome mention of the importance of the “green, open and spacious layout”; actions to mitigate impact on climate change and reduce carbon emissions; and of strategic objective 14, 15 and 16 in particular referencing the need for “easy access to open space”, biodiversity and connecting the linear park network into new developments and “conserving and enhancing key landscapes and important habitats”.</p> <p>To bring the Vision and strategic objectives into line with the NEP’s GI Vision and Principles, please add into the vision the importance that green spaces must be:</p> <ul style="list-style-type: none"> • “Connected” - to reflect the importance of green infrastructure being connected to improve access, health and wellbeing for residence, and resilience to pressures for wildlife. • Planned for early and strategically at all scales of development to provide multiple benefits. Existing natural assets including green infrastructure features connections and functions should be identified prior to development; and enhanced, extended, protected and connected appropriately – i.e. designed and planned for - so it provides multiple benefits –not just for “children” but to maximise the benefits it can bring to MK’s environment and wildlife, also to the health and wellbeing of its residents and to supporting the local economy. <p>NB - linked to the above point, Strategic Objective 17 would benefit from adding “green infrastructure into the list of services that should be provided for in a timely manner.</p>	<p>NEP GI Principles 2,3,4 and 6.</p>
3 Sustainable Development Strategy		
<p>Presumption in Favour of Sustainable Development (Para 3.5, page 11)</p>	<p>Welcome reference to the need to protect and enhance the natural and historic environment and address issues of climate change in achieving “sustainable development”</p>	
5 Spatial delivery of growth: strategic site allocations		
<p>Place-making principles for development</p>	<p>Welcome references to the beautiful, “biodiverse” city, and the need to enhance city parks, local parks, lakes and canals. To bring in line with the NEP’s GI Vision and Principles, we would</p>	<p>NEP’s GI Vision</p>

<p>Policy SD1 (pages 34-35)</p>	<p>encourage reference also to</p> <ul style="list-style-type: none"> the need to identify, protect enhance and connect existing green infrastructure of all types (natural as well as man-made spaces, playing fields, woodlands, etc) at all scales – into schemes, with the aim of achieving a connected network of green space to enhance biodiversity, access, health and wellbeing, as a necessary component of sustainable place-making. 	<p>NEP’s GI Principles – 4 and 6</p>
<p>Policy SD 5 Place-making principles for development (Page 35)</p>	<p>Welcome ref to points 6 and 7 in particular:</p> <p><i>“A landscape and open space strategy to improve biodiversity, provide advance structural planting, extend the “forest city” concept, and incorporate public art and leisure and recreation facilities;</i></p> <p><i>“A strategic and sustainable approach to urban drainage systems to control surface water flows”.</i></p> <p>To bring in line with the NEP’s Standard Response to Local Plans, we would encourage reference also to the</p> <ul style="list-style-type: none"> biodiversity opportunities around the design of sustainable urban drainage systems. 	<p>NEP’s Standard Response to Local Plans</p>
<p>Policy SD 11 General principles for new strategic urban extensions (page 46)</p>	<p>Welcome in particular general principle 2:</p> <p><i>“2. Sites must also provide the necessary infrastructure including highways and transport infrastructure, schools, health, open space and green infrastructure provision.”</i></p>	
<p>Policy SD12 Delivery of strategic urban extensions (Page 47)</p>	<p>To bring in line with the NEP’s GI Vision and Principles, we would expect reference here to the need for:</p> <ul style="list-style-type: none"> Early and strategic planning of green infrastructure. This would show that the policy endorses the NEP’s GI Principle 1 - that green infrastructure is as important and necessary as grey (man-made, constructed) infrastructure and social infrastructure for the health and wellbeing of Buckinghamshire’s economy, environment and society. 	<p>NEP GI Principle 1</p>
<p>7 Sustainable construction and renewable energy</p>		
	<p>Welcome encouraging improved energy efficiency, community energy networks and renewable energy schemes that may increase the amount of energy generated in Buckinghamshire, and generation that can benefit local communities. Much of this section aligns with the NEP’s standard response on energy.</p>	<p>NEP’s Standard Local Plan response, page 17+.</p>
<p>8 Managing and reducing flood risk</p>		
<p>General Approach (Para 8.5)</p>	<p>Welcome <i>“continuation of a locally specific strategic flood risk management policy, which prohibited development within the floodplain and sought flood management to be provided as strategically as possible and as part of multi-functional green</i></p>	

	<p><i>infrastructure”.</i></p> <p>This general approach is in line with general requirements in the NEP’s Standard Local Plan response.</p>	
<p>Policy FR 2 Sustainable Drainage Systems and Integrated Flood Risk Management (Page 85)</p> <p>And Policy FR3 Protecting and enhancing watercourses (Page 85)</p>	<p>Welcome that all new development is required to incorporate SuDS. (NEP’s Standard Local Plan response page 11); and to provide an undeveloped buffer zone between all new development and all watercourses.</p> <p>To bring in line with the NEP’s requests, the policies FR2 and FR3 could be strengthened by referencing the expectations that new development should:</p> <ul style="list-style-type: none"> • Safeguard floodplains and floodplain habitats • Seek opportunities to create wetlands and wet grasslands and woodlands and restore natural river flows and floodplains; • Seek opportunities for SuDS to be designed to maximise the opportunity to benefit biodiversity • Avoid building over or culverting watercourses and encouraging the removal of existing culverts and development should not prejudice future opportunities for de-culverting. • Ensure no adverse impact on the functions and setting of a watercourse and its associated corridor. 	<p>NEP’s Standard Local Plan response, page 11+.</p>
<p>9 Biodiversity and Geodiversity</p>		
<p>Page 86</p>	<p>Welcome the following in the supporting text:</p> <p>Recognition in the national policy context of the move away from net loss of biodiversity towards net gains for nature (Para 9.1);</p> <p>The importance of green infrastructure to supporting healthy ecosystems and to manage environmental risks including flooding and heat waves (Para 9.6);</p> <p>The importance of Milton Keynes Wildlife Sites</p> <p>Relevant strategies of the NEP – including the “Forward to 2020” Biodiversity Action Plan including the importance of locally identified priority habitats and species and reference to Biodiversity Opportunity Areas (Para 9.13 – Para 9.15; also Para 9.19).</p> <p>Reference to the mitigation hierarchy (Para 9.18)</p> <p>Reference to biodiversity offsetting as a proposed approach to compensate for habitats and species lost to development in one area with the creation, enhancement or restoration of habitat in another (Para 9.21 and Policy NE3 – “Biodiversity and Geological enhancement”).</p> <p>Reference to a “Biodiversity Impact Assessment metric” to help measure the habitat value gain or loss due to development (Policy NE3).</p>	

<p>Policy NE1 (Page 90)</p>	<p>We would also expect to see reference to the following to strengthen Policy NE1 (Nature Conservation Sites)</p> <ul style="list-style-type: none"> • Clear requirements for development proposed within or adjacent to a BOA – including: <ul style="list-style-type: none"> - the need for a biodiversity survey looking at both constraints and opportunities for enhancement; and that - development that would prevent the aims of a BOA being achieved will not be permitted. - Where development has potential in or adjacent to a BOA, its design and layout, planning conditions and obligations will be used to secure biodiversity enhancement to help achieve the aims of the BOA. • Include “irreplaceable habitats” into the policy text on action for development proposals likely to harm a National Nature Reserve, SSSI, etc. • Clearer articulation of the mitigation hierarchy to include – in this order: <ul style="list-style-type: none"> - Avoid (is there a suitable alternative to development which avoids the impact?) - Mitigate – all possibilities to be put in place - Compensate: on-site first to ensure net gain in biodiversity; off-site compensation a possibility thereafter, only after other options exhausted. • Reference to the Greensands Ridge Nature Improvement Area (NIA) and an appropriate planning approach to it given its potential impacts on important ecological networks and opportunities for enhancement. NIAs aim to deliver a step change in nature conservation, where a local partnership has a shared vision for the natural environment and works to deliver it at a landscape scale. The NIA Partnership will plan and deliver significant improvements for wildlife and people through the sustainable use of natural resources, restoring and creating wildlife habitats, connecting local sites and joining up local action. The NEP recognises the importance of working together on a landscape-scale across administrative boundaries to produce the best results for the environment and for our communities and economy which depend on it. We recognise that NIAs are landscape-scale initiatives and similarly aim to ensure that land is used sustainably to achieve multiple benefits for people, wildlife and the local economy. 	<p>NEP’s Standard Local Plan response, page 3.</p> <p>NEP’s recent work on biodiversity in development and in developing a biodiversity accounting method for Buckinghamshire.</p> <p>The Bucks and MK NEP recognised the Greensands Ridge Nature Improvement Area in October 2016.</p>
<p>Policy NE2 (Page 91)</p>	<p>We would expect to see reference to the following to strengthen Policy NE2, Protected Species</p> <ul style="list-style-type: none"> • Recognition of the importance of and need to protect priority habitats and species. This could be added into text in the title of Policy NE2; also to add “priority species and habitats” into text where protected species and habitats are currently mentioned (e.g. Para 9.19)). • Minimum buffer between development and 	<p>NEP’s BAP (“Forward to 2020” work)</p>

	<p>irreplaceable habitats (e.g. ancient woodland and veteran trees) and its long-term management to be secured as part of planning permission.</p> <ul style="list-style-type: none"> • Hedgerows – should be retained along with provision of a suitable protective buffer from development sites. Where hedgerow loss is unavoidable new hedgerows should be created – using native species and at least 3 times the length loss in line with good practice. <p>We would also like to see reference to the following to strengthen Policy NE3 (Biodiversity and geological enhancement)</p> <ul style="list-style-type: none"> • Reference to the need to provide a net gain for biodiversity included in the policy text. • Reference to implementing the mitigation hierarchy included in the policy text. • A monitoring framework into the long-term to ensure net gains in biodiversity that are proposed are actually achieved, with remedial measures not achieving satisfactory conditions within stipulated timeframes. • Reference to a forthcoming SPD to provide details of a suitable biodiversity accounting and offsetting mechanism. 	
<p>Para 9.22, Page 91</p>	<p>Green Infrastructure</p> <p>Welcome the explicit reference to the NEP’s “Vision for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes” (Para 9.22), the 9 principles required to achieve it and expectations for Local Plans, including the need to confirm the ANGSt standards at the strategic scale.</p> <p>Also welcome recognition of the importance of GI in Policy NE4, Green Infrastructure.</p> <p>To strengthen the Policy, we would also expect to see reference to the need to:</p> <ul style="list-style-type: none"> • Delivery of strategic goals for GI across county – Plan:MK to look to provide strategic-scale benefits, in addition to local Borough ones - setting out clearly how the Plan will specifically support the NEP’s county-wide Vision for GI covering Buckinghamshire <i>and</i> Milton Keynes. <i>(NEP GI Principles 1, 8 and 9)</i> • The need for early and strategic planning for GI needs at all scales, to provide multiple benefits for future residents. This involves identifying and taking into account existing GI and biodiversity features of importance, the functions provided by them and looking strategically for opportunities for improvement - including connecting to existing and potential networks beyond administrative and development boundaries, as well as enhancing, extending and protecting GI. 	<p>NEP’s GI Vision and Principles document – Principle 7; and, same document - Expectations for Local Plans – Page 18, point 2.</p>

	<p>We would expect this to include</p> <ul style="list-style-type: none"> • specific mapping work to identify existing key GI features of importance and the functions provided by GI; how best to link areas of GI given areas of growth and other pressures; identifying areas of GI deficiency and making sufficient provision through new / improved GI to meet access standards and maximise wider benefits; and actively seeking opportunities to protect, enhance, improve and connect. <p>We would expect such a map should set out what MK aims to protect, provide for or improve and where, and how this contributes overall to the Buckinghamshire-wide Vision for the Improvement of GI by 2030, including connected networks of GI showing the Vision for what MK aims to protect, provide for or improve and where. <i>(NEP GI Principles 2, 3 and 4; and Expectations for Local Plans - page 18, NEP Vision and Principles document)</i></p> <p>In addition we would also welcome reference to the need to:</p> <ul style="list-style-type: none"> • Work cross-border to deliver landscape-scale connected green infrastructure to maximise benefits: i.e. the need to look beyond the immediate administrative or development boundary to ensure appropriately connected GI from the development scale to the landscape scale. 	
<p>11 Open Space, Leisure and Recreation</p>		
<p>Supporting text</p>	<p>Welcome quotes from the NPPF emphasising the need for open space provision and its links to the health and wellbeing of communities (Para 11.3, page 103) and its contribution to biodiversity (Para 11.11, page 104).</p> <p>Also welcome explicit reference to the NEP’s “Vision for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes” (Para 11.9, page 103), the 9 principles required to achieve it, and how the Vision and Principles supplement the earlier Green Infrastructure Plan.</p> <p>And – welcome the need for proposals to include a long-term maintenance plan (Policy L3 Standards of Provision).</p>	
<p>12 Design</p>		
<p>Policy D2, Designing a Good Quality Place (Page 113)</p>	<p>Welcome reference to street trees and shrub planting to soften the streetscape.</p> <p>To strengthen the design policy we would welcome</p> <ul style="list-style-type: none"> • reference to Appendix 2, in the NEP’s Vision and Principles for the Improvement of GI document “<i>Measures to enhance biodiversity in built environments</i>” which outlines many more examples of measures at all scales that can be taken to enhance biodiversity in development - from the scale of individual houses and gardens, to the street network and larger areas of green spaces at the development scale and beyond. 	<p>Appendix 2, “Measures to enhance biodiversity in built environments” NEP’s Vision and Principles for the Improvement of GI</p>

14 Culture and Community		
Para 14.20	<ul style="list-style-type: none"> To bring in line with the NEP’s GI Vision and Principles we would expect to see reference here to green infrastructure and open spaces as a “requirement” of any community in recognition that green infrastructure is as important <i>and necessary</i> as man-made or social infrastructure for the health and wellbeing of communities. 	NEP’s GI Vision and Principles document – Principle 1
16 Infrastructure Delivery		
Page 163	<ul style="list-style-type: none"> To bring in line with the NEP’s GI Vision and Principles we would expect to see reference here to green infrastructure and open spaces as a “requirement” of any community in recognition that green infrastructure is as important <i>and necessary</i> as man-made or social infrastructure for the health and wellbeing of communities. 	NEP’s GI Vision and Principles document – Principle 1
Appendix B Open Space and Recreation Facility Provision		
Page 166 +	<p>Request inclusion that all residents should have access to green space at least meeting “ANGSt” (Accessible Natural Green Space) criteria, or equivalent, wherever possible.</p> <p>(NB – The ANGSt This standard was developed by Natural England and the Forestry Commission and emphasise the importance of communities having easy access to different sizes of natural and semi-natural green space close to where they live).</p>	