

DCLG Consultation Proposals: Planning for the right homes in the right places

Response from the Buckinghamshire and Milton Keynes Natural Environment Partnership (the “NEP”)

The Buckinghamshire and Milton Keynes Natural Environment Partnership (the “NEP”) brings together local authorities and organisations from across the public, private, health and education sectors, as well as conservation and community organisations to champion the value of the Buckinghamshire environment in decision-making, and to encourage environmental protection and improvement for multiple benefits – for the environment, businesses and the economy, and the health and wellbeing of communities and the society of Buckinghamshire.

The NEP welcomes the opportunity to comment on the DCLG consultation proposals.

Our response is based on the premise that more should be done to recognise the multiple benefits to society and the economy as well as the environment, of better integrating environmental considerations and achieving environmental gains through planning and development. We highlight below several priority areas of our current work that would benefit from clearer direction at national level, and which would help to better integrate planning and the environment.

The need for more joined up planning and environmental policy and practice

The current Government has pledged to leave the environment in better condition than they inherited it. We now eagerly await the launch of Defra’s 25 Year Environment Plan to set the direction of travel. In the NEP’s experience at the local level, we face unprecedented growth across our region and the immediate need to ensure the environment is properly accounted for and valued in decision making. As part of this, we recognise the need for better linkage and integration between DCLG and Defra policies and welcome the opportunity to make the case in direct response to this consultation.

We believe this consultation exercise is an opportunity to emphasise the importance of making sure that planning for residential development works mutually for the benefit of the environment and development. To identify, protect, enhance and create opportunities for existing and new environmental assets through development, is safeguarding the services those assets provide for the future – for the multiple benefits to our communities, our health and wellbeing and the economy – as well as for the environment. Joined up environmental and development policy would create development that is truly sustainable.

We set out below our response to the current consultation with these objective in mind.

The NEP’s response: Improving current practice for viability assessment.

Q13 in the consultation document asks about amendments that could be made to improve current practice in respect of viability assessment of local plans, and whether changes in planning guidance could be made to improve this process to ensure that local plans are deliverable.

Consultation Question 13:

In reviewing guidance on testing plans and policies for viability, what amendments could be made to improve current practice?

The NEP wishes to emphasise the following points - which build on the work we are currently undertaking across Buckinghamshire and Milton Keynes. **We believe these practices should be requirements of assessing local plans for viability, and are needed to properly integrate environment and development at the local level through planning – and so to maximise the multiple benefits and opportunities that would then arise.**

- i) **Biodiversity accounting – the viability assessment should include the requirement for local plans to achieve net biodiversity gain – and to assess and achieve a long-term net gain in biodiversity using latest good practice guidance and methodologies**

The NEP is leading work in partnership with its members to encourage use of a standardised metric across Buckinghamshire and Milton Keynes to

- assess net changes in biodiversity resulting from proposed development;
- ensure long-term net gains are actually achieved and maintained; and to
- integrate the proper use of the mitigation hierarchy into development.

We believe that all development should be required to undertake biodiversity accounting, based on a common metric, to assess proposed impacts on biodiversity, and to require a net gain. This should be achieved by following the “mitigation hierarchy” – from avoidance of a particular site for environmental reasons, and then by looking first on-site for mitigation and compensation and then as a last resort off-site compensation.

Requiring long-term net biodiversity gain in a viability assessment of a local plan, assessed using a recognised metric / calculator, has several advantages:

- **help provide certainty to developers into the long term (so allowing them to adequately plan investments);**
- **would even up the current playing field – where requirements for assessing and achieving biodiversity net gain vary around the country.**

The NEP is also exploring the viability of a flat fee being required per unit built, to operate in addition to biodiversity accounting, which would separately recognise the broader increased pressure and demand on the surrounding environment – for leisure and recreation in particular – caused by development and increasing populations.

- ii) **The need for green infrastructure to be identified early, and planned for strategically at the local plan level, as well as built into developments, with improved quality, amount and connectivity to surrounding networks – to achieve multiple benefits – should be an integral part of the viability assessment.**

Improving the quality, amount and connectivity of green infrastructure will achieve multiple benefits for all, which are sustainable if adequately managed into the long term.

In 2016, the NEP and its Partners put together an agreed Vision for Green Infrastructure in Buckinghamshire and Milton Keynes by 2030 and a set of Principles that should be adhered to in order to achieve it¹. Overall – the NEP advocates the consideration of, protection and improvements to existing quality, quantity and connectivity of green infrastructure, including blue infrastructure (e.g. waterways, rivers, canals etc.) early and strategically to deliver maximum benefits to all.

The NEP’s Partners want to see by 2030 a landscape-scale network of green and blue infrastructure that is well-designed, accessible, used and valued by residents, connected together at the landscape scale, including across administrative borders, is wildlife-rich and necessary into the long-term to provide multiple benefits. We want to see this delivered through support, commitment and adequate funding.

To achieve the Vision, and therefore the huge potential multiple benefits of green infrastructure, the NEP would like to see planners and developers being required to:

- Recognise that Green Infrastructure is as important and necessary for the social, environmental and economic health and wellbeing of our areas as is man-made / constructed infrastructure;
- Ensure that value of GI and its benefits are identified, considered and planned for early and strategically;
- Make provision to manage GI into the long-term, so its benefits can be provided long term;
- Identify priority opportunity areas to connect and coordinate with neighbouring areas, and linked to and in support of other policy objectives.

These requirements for Green infrastructure planning and provision in order to achieve multiple benefits (and potential cost efficiencies) for society, health and wellbeing, the economy and the environment, should be recognised as an essential part of the infrastructure necessary to deliver the Plan – and so should be an integral part of the viability assessment.

We therefore request that the viability assessment of local plans must include assessment of whether the plan has identified early opportunities to maximise the contribution of development to the environment – by assessing, identifying and taking into account in planning, the following:

- **location, type and condition of existing natural assets**
- **the benefits / services they provide**
- **opportunities to improve the quality, amount and connectivity of natural assets and Green Infrastructure in light of development; and to**

¹ See <http://www.bucksmknep.co.uk/wp-content/uploads/2016/09/NEP-GI-Vision-and-Principles-FINAL.pdf>

- **make provision for a mechanism to manage green infrastructure into the long term.**

This assessment should be properly integrated into the choice of location, design, build and operation of all development – from individual dwellings, to gardens, streets, development level, infrastructure and beyond.

A well-designed site incorporating green space and biodiversity and being well linked to surrounding areas of green and blue infrastructure is a positive advantage to the viability of new development. Home buyers will pay a premium for houses on such sites which will more than offset the costs of incorporating such features. It would also assist in the trade-off between increasing on-site biodiversity and other requirements such as affordable housing.

- iii) **Clear recognition of the importance of protected and priority species and priority habitats**

The NEP requests that a viability assessment should include clear recognition of the importance of priority sites (international, national and local) and of protected and priority species, and the need to avoid negative impacts on these populations or habitats. The NEP suggests that Local Plans should clearly state that when there is a reasonable likelihood of the presence of priority habitats, whether designated internationally, nationally or locally, or of protected or priority species or their habitats, development will not be permitted until it has been clearly demonstrated that the proposed development will not result in a negative impact on these populations or habitats.

Summary

We hope that future proposals take into account our points set out in this response - the need to respect and contribute to landscape requirements for more, better and better-connected green space for the benefit of people, the economy and wildlife; to clearly identify and work to maximise biodiversity net gain; maximise natural assets and ecosystem services benefits through clever and careful location and design of development (seeking to avoid impacts first, wherever possible, in line with the mitigation hierarchy); during construction and into the longer term post-construction.

The NEP would also like to refer to the points made in its [Standard Checklist Response to Local Plans](#). Although this document is targeted towards Local Planning, it provides a useful checklist to the principles and expectations the NEP has of good planning for all development and infrastructure – in relation to biodiversity, protected sites, ecological networks and green infrastructure in particular: from environmentally-sensitive route selection and construction, incorporating biodiversity and green spaces into development proposals and compensating / mitigating wherever needed; the protection and enhancement of river and stream corridors and slowing the flow, particularly using natural means, to reduce flood risk. We would encourage a review of this document.