



Buckinghamshire and Milton Keynes Natural Environment Partnership
www.bucksmknep.co.uk

10 March 2015

Planning Policy Team
Chiltern District Council Offices
Kind George V Road
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By email only

Dear Policy Team

**Buckinghamshire and Milton Keynes Natural Environment Partnership:
Consultation response to the Emerging Chiltern and South Bucks Local Plan Issues and
Options consultation**

We welcome the opportunity to comment on your Local Plan consultation. The Buckinghamshire and Milton Keynes Natural Environment Partnership (the “NEP”) wishes to make the standard comments in Appendix 1 by way of response. This sets out the strategic issues at a landscape-scale that the NEP would expect the New Local Plan to have regard to. Our response is supported by representatives from across the NEP, and has been formally approved by the NEP Board.

The purpose of the Buckinghamshire and Milton Keynes Natural Environment Partnership (The “NEP”) is to champion the value of the environment in Buckinghamshire and encourage environmental protection and improvement - for the benefit of the environment, as well as for businesses and the economy, the health and wellbeing of communities and the society of Buckinghamshire. The NEP works in partnership with a range of organisations from across the public, private, health and education sectors, conservation and community organisations. (See Table below for the NEP Board member organisations).

Biodiversity and the environment, if recognised, conserved, enhanced and managed in the right way, is critical to providing the multiple benefits needed for Buckinghamshire during its period of growth. Taking into account during planning and assessment the environmental assets of Buckinghamshire, and aiming to protect and enhance the benefits they provide to us, should affect when, where and how

development takes place. This supports a sustainable growth that meets the needs of the environment, our economy and society.

The objectives of the NEP

The work of the NEP is based on the following themes:

- **Partnership development** – collective voice and coordinated working
- **Promoting the environment as an economic asset and driver of growth** – the NEP aims for a prosperous Buckinghamshire and Milton Keynes economy supported by, managing and protecting its natural capital.
- **Developing frameworks to support landscape scale projects** – we aim for restored and connected habitats across the whole county, creating resilient wildlife populations and allowing wildlife to adapt to climate change and other pressures.
- **Connecting people and nature – highlighting the health and wellbeing benefits of the natural environment** – aiming for healthier communities enjoying a greater quality of life, health and wellbeing through accessing and enjoying their natural environment.

Why has the NEP provided guidance on Local Plans?

The Government made it clear in the Natural Environment White Paper (NEWP) that it

“expects the planning system to deliver homes, businesses, infrastructure and thriving local places that the country needs, while protecting and enhancing the natural and historic environment.”

This forms the backdrop to the National Planning Policy Framework (NPPF) and the Government’s ambition to achieve ecologically-coherent planning.

The NPPF makes it clear that local authorities should be engaging with Local Nature Partnerships:

“planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area including drawing for example, from the River Basin Management Plans... Working with Local Nature Partnerships where appropriate...”
(paragraph 165)

“...local planning authorities should work collaboratively on strategic planning priorities to enable delivery of sustainable development in consultation with Local Enterprise Partnerships and Local Nature Partnerships...” (paragraph 180)

Duty to Cooperate

The Town and Country Planning (Local Planning) (England) Regulations, as amended by the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 to include Local Nature Partnerships, place a duty to cooperate on Local Planning Authorities and other public bodies in the preparation of Local Plans. The relevant bodies that are subject to the duty must have regard to the activities of both Local Enterprise Partnerships and Local Nature Partnerships, so long as those activities are relevant to local plan making.

The Planning Practice Guidance, published by the Department for Communities and Local Government ([found here](#), as accessed on 4 Mar 15) emphasises the need to work at the strategic scale on biodiversity issues with Local Nature Partnerships, and the important role of Local Nature Partnerships in strategic planning. Paragraph 06 also states that:

“Local Nature Partnerships work strategically to help their local areas manage the natural environment and they are encouraged to work at a broader “landscape scale”. Local planning authorities should seek opportunities to work collaboratively with Local Nature Partnerships to deliver a strategic approach to encouraging biodiversity.”

Paragraph 08 also emphasises strategic-scale working, and notes the need for a Local Planning Authority to work with other local planning authorities, with the aim to encourage positive, continuous partnership-working on issues that go beyond a single local planning authority’s area:

“The duty to cooperate seeks to ensure that local planning authorities lead strategic planning effectively through their Local Plans, addressing social, environmental and economic issues that can only be addressed effectively by working with other local planning authorities beyond their own administrative boundaries. For example...river catchments and ecological networks may represent a more effective basis on which to plan for housing, transport, infrastructure, flood risk management, climate change mitigation and adaptation, and biodiversity”.

The NEP expects all relevant local authorities and other public bodies to co-operate with us, and have regard to our responses in line with the above referenced guidance. For instances where the NEP is unable to respond on an individual basis, we have outlined at Appendix 1 the key principles that we would expect to underpin local documents and decision-making with respect to the planning of sustainable development.

Our comments on the Emerging Chiltern and South Bucks Local Plan Issues and Options consultation

Our comments respond to the public consultation document's statement that it seeks to gather views on the key issues that the joint local plan will need to address, and to help inform the plan vision, development strategy and plan objectives.

Thank you again for the opportunity for us to input into the Local Plan. Please do not hesitate to get in touch if you have any queries regarding our response.

Yours faithfully,



Sir Henry Aubrey-Fletcher
Independent Chair
Buckinghamshire and Milton Keynes Natural Environment Partnership

Table: NEP Board member organisations (at March 2016)

Organisation
Independent Chair
Aylesbury Vale District Council
Berks, Bucks and Oxon Wildlife Trust
Buckinghamshire County Council
Bucks, Thames Valley LEP
Chilterns Conservation Board
Chiltern Clinical Commissioning Group (NHS)
Chiltern District Council
Forestry Commission
Milton Keynes District Council
Natural England
Ngage Solutions
National Farmers Union
Open University
South Bucks District Council
Wycombe District Council