



12th October 2021

By email: Oxford-cambridgearc@communities.gov.uk

Dear Sir / Madam,

OxCam Arc Spatial Framework Consultation: “Creating a Vision for the Oxford-Cambridge Arc” – response from the Buckinghamshire and Milton Keynes Natural Environment Partnership

The Buckinghamshire and Milton Keynes Natural Environment Partnership (the “NEP”) represents organisations from the conservation, local authority, business, health, education and community sectors across Buckinghamshire and Milton Keynes. As the area’s Local Nature Partnership, we work collaboratively to improve the environment and ensure it is appropriately taken into account in local decision-making. The NEP welcomes the opportunity to comment on the proposals in the OxCam Arc Vision / Spatial Framework consultation. (Note, the views expressed here represent the position of the Bucks & MK NEP and are not intended to replace those individual views you may received from our members.)

In general, we agree that the vision should be the “core of the Spatial Framework” and that local residents should have a say in its development. However, we are keen that the Vision must seek “exemplar” status in respect of the natural environment to be sufficiently ambitious. Our key points are highlighted below, using the themes as set out in the online consultation.

Creating a vision for the Arc

Overall, the OxCam Growth Arc has the unique opportunity to become an exemplar of environmentally-driven growth with ongoing and sustainable benefits to all. Adhering to the agreed [Growth Arc Environmental Principles](#) (prepared by the Arc Environment Working Group and endorsed by the Arc Leaders, Universities and LEPS) would support such a green vision for the Arc, and help it achieve the “ambitions and aspirational” vision as suggested in the consultation, going beyond just compliance with existing or proposed national legislation and policies, and go further, faster.

The agreed **Environmental Principles** set out the following five headline objectives, all of which **must be a central part to, embedded within, and form the basis of, any vision for growth in the area** and should be used to shape broader plans for the Arc and be used as the building blocks for any Arc Spatial Strategy:

1. Work towards a target of **net zero carbon by 2040**, ensuring development and new infrastructure support this goal;
2. **Protect, restore, enhance and create new nature areas and natural capital assets** – including doubling the land managed primarily for nature;
3. **Be an exemplar for environmentally sustainable development**, in line with the ambitions set out in the government’s 25 year Environment Plan;
4. Ensure that **existing and new communities see real benefits**, particularly health and wellbeing, from living in the Arc; and
5. **Use natural resources wisely.**

The Arc should look to exemplify best environmental practice, conservation principles and the ambitions of the Government’s 25 Year environment Plan, incorporate them into planning for the area and support their delivery.

Such a vision might incorporate the need for environmentally-sustainable development (a broader concept than biodiversity and habitat aspects of the natural environment, also embracing aspects of energy-efficient affordable housing, access to high-quality, natural green space, clean air and water, and good soil quality (particularly as over 70% of the land area in the Arc is agricultural) and include at least the following elements:

- **Biodiversity and green and blue infrastructure needs and opportunities should be planned for early and strategically across the Arc**, and be formed around a detailed review of nature to determine what should be protected, improved, connected, reconnected or created to maximise wildlife benefits, and to understand more broadly the environmental capacity of the Arc in respect of growth – including, for example, ensuring a level of growth that provides nature positive outcomes, avoids damage, is based on a review of what is sustainable (e.g. demand for water) and reduces risk to the natural environment (e.g. the capacity of the water environment to receive treated effluent without deterioration). If a development is not within the environmental capacity and does not contribute to nature’s recovery, it should not go ahead.
- **Protecting, maintaining, restoring, creating and connecting wildlife-rich habitats** also provides opportunities to **establish a healthy and growing range of broader, ecosystem services from natural capital, with benefits to all** – including clean air, water and soil quality, carbon storage, flood attenuation, and where appropriate (e.g. outside sensitive areas) access and recreation, also providing broader health and wellbeing benefits.
- Alongside the issues mentioned, such as natural capital, nature’s recovery, air quality, flood risk, access to nature and green space, **other environment issues such as soil quality, agriculture and land management, waste and mineral resources also require specific attention**, and all in the context of carbon and

climate change,

- **Ambitious, landscape-scale environmental opportunities** exist across the Arc that were identified jointly by the Arc's Local Nature Partnerships in 2020. (see this [link on the Buckinghamshire and Milton Keynes Natural Environment Partnership's website](#)). Putting these into practice offers a unique opportunity to ensure nature's recovery in an area of economic growth – with benefits not just to nature and wildlife, but also to the economy and society – and connect and reconnect nature at the landscape scale. In the Bucks & MK area, the strategic-scale environmental opportunities include the Bedford-Milton Keynes Waterway, Bernwood-Otmoor-Ray and the concept of an Arc Forest Park linking the Arc through natural greenspaces east-west.
- The Arc should seek to ensure its environment and pursuit of environmental opportunities adhere to **Lawton's Principles** for biodiversity of more, bigger, better and connected – at all scales, from the landscape-scale to the context of individual species and habitats – all important in planning for the natural environment. as well as enhancing the area's attractiveness for growth.
- **Realising such strategic-scale conservation opportunities may take a cross-Arc plan and true partnership-working to deliver** them at the strategic scale.
- **Upcoming Local Nature Recovery Strategies offer an opportunity for reconnecting fragmented habitats and working more strategically across the Arc** to protect, restore, connect and create areas for nature's recovery. There are opportunities to ensure exemplary remotely-sensed and mapped environmental data are collected for the baselines; and the resulting priorities and network should be given real weight in planning and decision-making.
- **Growth and development should take their spatial cues from the environment** to ensure truly sustainable growth, future-proofed and contributing to mitigating and adapting to major challenges affecting the environment, including climate change and the biodiversity crisis. Development should be designed from the outset with nature in mind, targeted at places where it can have a positive environmental impact and contribute to a nature recovery network.
- **Best practice for incorporating biodiversity and green infrastructure into development should be followed.** New homes should meet the highest standards in sustainability and nature-friendly design, and aim at zero-carbon – e.g. the Passive House Standard aims to design out heating and cooling demand, and could be coupled with solar energy.
- **Future-proofing and nature-based solutions should be exemplified in the Arc, building resilience,** for example against climate change and its multiple impacts.
- In addition to new development, **there should be a focus on improving the sustainability of existing infrastructure, homes, businesses and jobs,** and their ability to support nature's restoration. For example, plans for the Arc should also

look at existing homes and how to improve their energy efficiency and connection to nature.

- **Working towards a target of net zero by 2040 will also require homes, infrastructure and transport to all play their part**, and should be supported by smart, low carbon and integrated approaches to energy. Transport, energy and buildings must all be decarbonized. Active transport and non-carbon transport to be readily available – e.g. new and improve cycle routes and green networks of walking and cycle paths.
- **As well as reducing emissions, the Arc should prioritise removal of carbon from the atmosphere.** Woodlands, habitats and well-managed soils capture carbon effectively and should be designed into growth; their wider benefits contribute to connecting people with nature including recreation, access, health and wellbeing.
- **The water environment is a critical component of the existing and potential biodiversity asset of the Growth Arc, and it is also highly vulnerable to the impacts of development pressure.** These impacts include the potential consequences of water resource provision, the impacts on the capacity of the water environment to take additional quantities of treated effluent without causing deterioration or preventing the achievement of environmental targets for water quality, and the impacts of development on river corridors and the ability for riparian and floodplain habitats to perform essential ecological functions.
- **Development in the Growth Arc must not proceed ahead of the development of sustainable water resources** and must not exceed the capacity of the water environment to cope with additional pressure from treated effluent. Many of the watercourses in the Arc are at the headwaters of river catchments, and due to their small size are vulnerable to increased loadings of effluent. The environmental capacity of the water environment, and the ability to meet Water Environment Regulation ecological targets, must be seen as legitimate constraints on the spatial zoning of development at least until the technology and capacity for effluent treatment has been demonstrated.
- **River / blue corridors should also be seen as priority areas for meeting landscape-scale ambition for biodiversity restoration**, and a focus on catchments and catchment processes will also allow broader objectives for water quality improvement and natural flood management to be identified and realised.
- **Decision-making locally should contribute to nature’s recovery and increasing the natural capital of the Arc.** This follows the Government response to the Dasgupta Review, to support integrating environmental considerations into economic and financial decision-making to ensure nature-positive outcomes.
- As a new regional entity, the Arc has the potential to significantly enhance the environmental value of the region by **integrating ‘green thinking’ from the growing knowledge economy into the vision.** There could also be a hub for the development of green skills, jobs and technologies.

- **Funding for nature's recovery should be a priority and a given**, in recognition of the substantial broader benefits to all of a healthy and thriving natural environment. Such funding should not be just dependent on mechanisms associated with new development, such as biodiversity net gain.

In respect of the survey response for the overall vision, the NEP considers that the Arc should be: sustainable, with a sense of community, equal / inclusive, progressive, collaborative for better outcomes, seek a better environment, be eco-friendly with a better place, achieving zero carbon and nature's recovery.

In terms of hopes and fears, the NEP would express the following:

Hopes:

That the Arc can be a true exemplar of sustainable development where the health of the environment and biodiversity is at the heart of strategic planning and delivery - to support, and be supported by, growth and economic development; and that there is investment in determining from the outset the current and potential natural capital and environmental services across the area, which can be used to guide growth and development to achieve the best outcomes. An environmental plan must be designed first, and an economic and spatial plan build around it.

Fears - that:

- There is an over-focus on economic growth and that it becomes the driver for the plan across the Arc, and which does not take into account sufficiently the abilities of the environment to support that growth or development;
- the scale of dependence of that development on the environment and the demand placed on its resources is not sufficiently understood, planned for or sustainable;
- The Arc's natural processes and natural resources are not sufficiently explored or understood to be appropriately conserved, improved, connected and created – yet there is only really one chance to get this right.
- Sufficient emphasis is not placed on the impacts of development to the dominant land-use of agriculture – and that the value of agricultural land to the environment and the potential wide-ranging environmental impacts of its loss are not weighed up in planning and development decisions. Factors that should be taken into account in a potential loss of agricultural land to development include: the loss of food production; the need for local food producers and reduced food miles; the potentially negative effects of loss of agricultural land on habitats, air quality, nitrogen and carbon fixation, and on surface water management issues.

In terms of the most important things that the Spatial Framework needs to do, to make the most of the area's unique potential for growth, the Arc still needs to:

Identify and suggest a way forward with regards to how competing priorities will be balanced:

In respect of the pillars of the consultation: the environment, economy, connectivity, infrastructure and place-making, the real challenge for the Spatial Framework comes in determining the importance of these issues relative to each other, and how the individual priorities stated under these pillars will be balanced. The consultation document appears

not to give explicit consideration to this challenge, risking that some audiences could think that all of the focus areas listed could be achievable simultaneously.

In particular, the Spatial Framework must provide a greater emphasis on the need for future growth to be low or zero carbon and ensure that this is threaded throughout the Framework as a cross-cutting theme, not simply as an element of the Environment pillar. It will be critically important in determining how different issues are prioritised and balanced; and has wider implications for the spatial distribution of growth and supporting infrastructure. Without reflecting on this issue throughout the Framework and across each of the individual pillars, the importance of the carbon challenge risks being lost when it should be a key consideration across the board.

In relation to the process of developing the vision, the NEP suggests the following should be prioritised:

Cross-boundary and cross-Arc coordination:

Subsequent stages in the development of the Framework must make progress in how growth will be coordinated at a strategic level. The Framework should add value in promoting better place-making and in providing a comprehensive, coordinated approach to the issues raised, above what is already contained in existing national planning policies.

As the Framework is developed, more focus should be given to cross-Arc coordination of major strategic issues, such as the environment. This can also help to enable collaboration and cross-boundary working on strategic issues if the formal Duty to Cooperate requirement is removed.

Habitats, landscapes and ecological networks do not respect or follow administrative boundaries, and it is important that the Framework encourages a cross-boundary approach, and provide a coordinated approach - essential if the infrastructure and environmental aims, objectives and priorities are to be realised.

Existing proposals and strategies should be taken into account

In relation to the environment, existing proposals and strategies in the area should be taken into account – e.g. for Milton Keynes, these are set out in the MK Strategy for 2050; the NEP also has major biodiversity and GI visions, principles and strategies that should be adhered to in Buckinghamshire and Milton Keynes. (See, for example, the NEP’s [“Vision and principles for the improvement of green infrastructure in Buckinghamshire and Milton Keynes”](#); also the NEP’s latest [Biodiversity Action Plan](#)).

Tackle how to deal with and balance out competing priorities head-on

As stated in the consultation document (para 2.12 box), there is doubt about whether the ambitions stated for the environment are achievable and there is little to indicate how these challenges must be balanced against the need for economic growth. For the Spatial Framework to add value and provide guidance to local authorities in their plan-making, it must tackle these challenges head on. The NEP supports the focus on the Arc’s Environmental Principles to guide truly sustainable growth.

Coordinating data to achieve a comprehensive baseline

Work to develop the Spatial Framework will need to tackle the complex picture of gathering data and evidence from potentially disparate and competing local studies, developed using a range of methodologies and over different time period. As stated in the Environmental Principles, the need to work collaboratively with environmental data is key – to ensure ready access to the wide range of environmental data currently collected at local level and to make publicly available agreed baseline maps for natural capital and ecosystem services across the Arc.

The Environment

In respect of the survey responses, all the subsection questions are considered “very important” on the scale given; these are:

- *Making sure the natural environment is protected, restored and improved (for example, improving new and existing open spaces).*
- *Making sure the most is made of the natural environment and that all people can have access to it (for example, making improvements to woodlands, wetland, green space and water and making sure people can visit them if they want to).*
- *Making sure new growth leaves the environment in a better state than before (for example, keeping land in its natural state, and making it more wild, where appropriate).*
- *Making sure new development helps to achieve net zero carbon at an Arc level towards national net zero targets. For example, through good design, sustainable travel choices, renewable energy and trapping carbon.*
- *Making sure that new development can respond to the current and future effects of climate change. For example, through new carbon emissions, water use, waste disposal and renewable energy targets.*
- *Making sure new development helps to improve air quality within the Arc. For example, through high quality design, low emission zones and sustainable transport.*
- *Taking a combined approach to air quality across the Arc. For example, through being careful about where each land uses should go, supporting journeys via public transport and active travel and enhancing green spaces and routes across the area.*
- *Making better use of resources and managing waste. For example, promoting the re-use of materials, and protecting and improving soil quality and minerals.*
- *Promoting a combined approach to managing water across the Arc, through protecting water resources, improving water quality and reducing the risk of flooding. For example, treating wastewater, improving water storage, and reusing surface runoff.*
- *Making sure new development reduces existing flood risk and is resilient to future flooding. For example, through tree planting and multifunctional sustainable drainage.*
- *Improving water availability and cutting the risk of drought. For example, through new sustainable water resources and infrastructure, and measures which reduce water use*

Other areas to consider

As the Environmental Principles state, the Arc should seek to maximise the health and wellbeing benefits of nature by providing sector-leading areas of accessible nature-rich greenspace in, and accessible to, new settlements, urban extensions and commercial zones and increasing and enhancing greenspace, and access to it, for existing settlements in the Arc. There is a need to invest in, increase, connect and enhance nature-rich greenspace in the places and communities where it is most lacking. Particular attention should also be paid to the following considerations:

- The need for accessibility must be conscious of the needs of sensitive nature areas. The Accessible Natural Greenspace Standards (ANGSt) provide a starting point, although further Government GI standards are also in development.
- Health and wellbeing benefits should be exploited for both existing and new residents will depend on access to nature and green spaces as well as low carbon integrated transport systems, improvements in air quality, etc.
- All new settlements, urban extensions and infrastructure should contribute to the achievement of delivering net biodiversity gain, net environmental gain, and net zero carbon, both in site and route selection and in the design of settlements and transport corridors.
- Cycling and walking should be made more attractive ways to travel and investing in zero emission public transport of the future.
- Future-proofing and nature-based solutions should be exemplified in the Arc, building resilience, for example against climate change and its multiple impacts.
- Enhanced building regulations and the role of planning policy should align with sustainability principles, and actively reduce the carbon footprint, water and energy consumption in new and existing buildings
- In addition to new development, there should be a focus on improving the sustainability of existing infrastructure, homes, businesses and jobs, and their ability to support nature's restoration. For example, plans for the Arc should also look at existing homes and how to improve their energy efficiency and connection to nature.
- Working towards a target of net zero by 2040 will also require homes, infrastructure and transport to all play their part, and should be supported by smart, low carbon and integrated approaches to energy. Transport, energy and buildings must all be decarbonized. Active transport and non-carbon transport to be readily available – e.g. new and improve cycle routes and green networks of walking and cycle paths.
- As well as reducing emissions, the Arc should prioritise removal of carbon from the atmosphere. Woodlands, habitats and well-managed soils capture carbon effectively and should be designed into growth; their wider benefits contribute to connecting people with nature including recreation, access, health and wellbeing.

The economy

A truly sustainable Arc would need to consider how all businesses contribute to and are part of a new, green economy.

There is need to be flexible in the ways new buildings are conceived, designed and built, to support nature's recovery, energy efficiency and net zero carbon goals.

Connectivity and Infrastructure

In respect of the survey responses, all the subsection questions are considered "very important" on the scale given; these are:

1. *Making sure planning takes a combined approach to new development by providing the infrastructure and services required at the right time to support growth for example, by planning for the need for utilities e.g. water, energy, waste and community infrastructure e.g. schools, hospitals GP surgeries).*
2. *Making sure new development makes the most of existing resources (for example, through making sure that materials are reused, renewable energy supplies are used, and waste is properly planned for).*
3. *Making sure that digital infrastructure is put in at the same time as other development takes place (for example, speeding up the fitting of high-speed broadband to support home-based work and help new ways of learning).*
4. *Making sure growth within the Arc is place around areas with better transport links for example, through having more development around stations and bus routes, supported by cycling and walking tracks).*
5. *Making sure new development cuts down the need to travel around the local area (for example, through promoting safe and easy walking and cycling routes to town centres, shops and schools).*
6. *Making sure new developments reduce existing and future infrastructure demand and resources used (for example, making sure that designs leave enough space for existing and future measures which reduce energy and water use, and cut down on waste).*
7. *Making sure sustainable transport principles are included in the design of new developments (for example, by designing new developments in a way that enables people to walk or cycle all or part of their journeys).*
8. *Creating better transport connections across the Arc and making sure they are provided in a way which supports sustainable new growth (for example, planning for public transport and physical transport infrastructure requirements).*
9. *Making sure there are more opportunities for active travel such as walking and cycling across the Arc (for example, wider pavements, segregated cycle lanes, improved network of cycle lanes, and better pedestrian crossings).*
10. *Making sure that there is the right form of public transport in the right areas across the Arc and can be used by all travellers, including people with any particular needs*
11. *Cutting down on the impact of cars and other private vehicles within the Arc (for example, by supporting more sustainable forms of private travel like cycling).*

Efficient resource-use and reducing waste and pollution are key to living and working sustainably in the Arc and ensuring sufficient resilience to and future-proofing for major pressures including climate change.

Growth levels and locations must be based on a proper assessment of the ability of the environment to support them and the ability of development to support nature's recovery.

In addition, any new or upgraded infrastructure should be environmentally sustainable, include nature-based approaches, and be resilient to pressures such as climate change and development, as well as contribute to environmental net gain in the Arc.

Place-making

In respect of the survey responses, all the subsection questions are considered "very important" on the scale given; these are:

- *Making sure new developments are built in the most sustainable locations, for the environment, the economy and communities (for example, by developing brownfield redevelopment and making sure they have good access to town centres, shops and schools).*
- *Making sure a coordinated approach is taken to the design and delivery of new developments to ensure they are supported by new and existing infrastructure.*
- *Making sure the environment and sustainability is at the heart of new developments (for example, by improving the built and natural environment, making sure development complements surrounding areas, and is supported by the right level of infrastructure).*
- *Making sure new developments help support healthy lifestyles for existing and future communities (for example, through walking and cycling, high quality green spaces, and accessible streets).*
- *Making sure new developments promote resilience to climate change (for example, through green roofs, managing surface water, tree planting, storing rainwater and new green spaces).*

Development on brownfield sites also needs careful consideration as they can, in their own right, be important for biodiversity.

Delivering the Spatial Framework

In respect of the survey responses, all the subsection questions would received a "strongly agree" on the scale given; these are:

- *To what extent do you agree with our proposed approach on data and evidence?*
- *To what extent do you agree with our proposed approach on delivery and funding?*

In addition, the NEP advocates that a robust monitoring and evaluation framework is essential to understand the effectiveness of the Spatial Framework and its policies. The Framework itself must

include clear targets and measures for monitoring, picking up those already agreed to in the Environmental Principles – e.g. delivery of Environmental Net Gain, net zero carbon by 2040, doubling the area of land managed primarily for nature, biodiversity net gain of 20% and increasing tree and woodland cover from 7.4% to 19%.

Scoping report for Sustainability Appraisal

In respect of the survey responses, we would agree in answer to the questions on the scale given:

- *To what extent do you agree with the key strategic issues and opportunities in the proposed scope for the Sustainability Appraisal of the Spatial Framework?*
- *To what extent do you agree with our approach to the Sustainability Appraisal?*

Whilst the SA Scoping Report is at a high level, we have a number of concerns regarding the content of the scoping appraisal and proposed spatial framework, and believe these can be improved. Our concerns are:

- **There seems to be a disconnect between the early text in the SA and what is set out in Table 5.1. in that the ideas of ecosystems services and natural capital** appear in the former but are largely absent in the latter. Much more is made of landscape character and designations that have little role in providing and maintaining ecosystems services and natural capital.
- **The appraisal document assigns values to ecosystem services and natural capital, although detail is not provided regarding how these were determined and the full value may not be reflected in the estimates.** For example, in respect of flood mitigation:
 - Woodlands are identified as providing flood mitigation, and this is given a value, but the positive or negative value of other land uses for flood mitigation is not considered;
 - Meadows and hedgerows can also have beneficial value with regards to flood mitigation
 - Agricultural land (arable in particular) may have negative values due to the lack of vegetation at some times of the year and the runoff of soil into stream, rivers and, drainage networks which can reduce their capacity
 - The full costs and benefits relating to natural capital and ecosystem services need to be considered, which is a considerable task. Substantial investment needs to be made to establish a reliable and replicable approach. Only then can this type of approach be used to inform decision-making, and avoid possible unintended consequences.
- **Interactions** - Table 5 appears to be a systematic listing of items, rather than a systems-based view of how these different elements work together, and what might be the consequences of activities in one element having big spill over effects in another. There is

mention in the approach to SA about team working and not working independently but little to say how differing perspectives and competing demands will be identified and managed and whether there are sufficiently diverse perspectives in the teams to avoid groupthink or not take innovative steps. The approach must consider interactions inherent within and connected environmental systems.

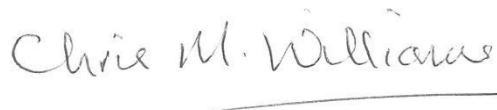
- **The approach taken must be clearly articulated** – to ensure any development will result in environmental net gain. Protection and improvement of the environment must not be traded off against social or economic benefits.
- **The Sustainability Appraisal Scoping Report does not appear to identify nature and environment land designations such as SACs and SSSIs** as constraints on development and growth. Designated sites and irreplaceable habitats should be identified as constraints on development; and the wider landscape should also be considered;
- **Biodiversity is included in the consideration of issues and opportunities in the SA scoping report, but the accompanying detail would limit how effectively it would be considered**, as it is limited to designated sites and not the wider landscape. The proposed ‘Spatial Framework’ issues identified are relatively limited:
 - In relation to habitat loss and fragmentation, only references designated ecological habitats; however designated sites are only part of wider habitat networks and they cannot function in isolation. Wider habitat networks include a variety of spaces and features that may be less significant in isolation but are essential to wider ecological functionality when taken together. Therefore, habitats must not be confined to those which are designated.
 - It is suggested that only significant effects will be considered, which could mean that the cumulative impact will not be reflected. As a result, it could risk efforts to avoid, mitigate, and compensate for the other impacts not being factored in. Consequently, this may leave an impression that any proposed Spatial Framework is more sustainable than it is.
- **There does not appear to be any mention of the mitigation hierarchy.** It is important that the Spatial Framework must follow the mitigation hierarchy of avoid, mitigate, restore, compensate.
- **Other risks that need to be considered include soil quality.**
- **The consultation document suggests that new settlements along the route of East-West Rail will not be covered by the Spatial Framework** and will therefore not be subject to the Sustainability Appraisal (“SA”) and Strategic Environment Assessment (“SEA”) to carried out in respect of the Spatial Framework. East-West Rail and new settlements should be subject to full Strategic Environmental Assessments to ensure the Arc delivers commitments to environmental ambitions and sustainable growth.
- **There is also a need for considerable time and resources to develop an up to date and accurate understanding of the baseline.** The LNRS pilot for Buckinghamshire made a start on this but more work is needed.

Finally, in respect of additional strategic data to take into account as part of the SA, the NEP would suggest the Paper that accompanies the LNPs' Strategic-Scale Environmental Opportunity Mapping (Figure 2.2. in the consultation) – available here: <https://bucksmknep.co.uk/projects/doubling-nature/>

We look forward to discussing any of these point with you in future as the Framework is developed.

Best wishes.

Yours faithfully,

A handwritten signature in cursive script that reads "Chris M. Williams". The signature is written in black ink and is positioned above a thin horizontal line.

Chris M Williams

Chair, Buckinghamshire and Milton Keynes Natural Environment Partnership