

MK City Plan 2050: Draft Local Plan Reg 18 Consultation



8th October 2024

MKCC Development Plans team
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Dear MKCC Development Plans team,

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

The Buckinghamshire and Milton Keynes Natural Environment Partnership is the area’s formal Local Nature Partnership, and welcomes the opportunity to provide a response to the Milton Keynes Draft Local Plan Regulation 18 Consultation.

The purpose of the NEP is to champion the value of the environment across Buckinghamshire and Milton Keynes, and encourage environmental protection and improvement. The NEP works in partnership with a range of organisations, including Milton Keynes City Council, from across the public, private, health and education sectors, conservation and community organisations. We collectively produce strategies to improve the environment, response to consultations of relevance, bring together expertise and communities of practices from multiple sectors and work collaboratively on projects to improve the local environment – for benefits to wildlife, as well as for businesses and the economy and the health and wellbeing of people and communities.

Our response calls for more focus on the following

Having reviewed the Regulation 18 draft Local Plan, we would like to encourage more focus on the following:

- **Building nature into development** – within the suggested “infrastructure first” approach - i.e. emphasis on maximising opportunities for linking with existing nature networks to improve nature-based connectivity (e.g. hedgerows) and designing in space for nature in new development.
- **Long-term management of green and blue infrastructure** – the need to secure funding and an appropriate mechanism / structure for the long-term management of green spaces, including spaces for nature, within any new development and built-up areas.

- **Tackling the impacts of climate change** – related to the above, the need to design in future-proofing for climate change into development – e.g. with selection of species for planting, and ensuring rainwater capture, cooling and shading, making sufficient and appropriate space for nature in development in preparation for a changing climate.
- **Using nature-based solutions to reduce flood-risk** – and for tackling other risks.
- **Restoring and connecting important sites for nature** – retain, improve and enhance important habitats and sites for nature. In line with the area’s Biodiversity Action Plan¹, there should be a focus on protecting, restoring and connecting priority habitats in Biodiversity Opportunity Areas², and making green connections and links link between the BOAs to form an ecological network to improve wildlife resilience to pressures including development and climate change.
- **Explicit reference to applying Natural England’s new GI Framework** should be made more prominent – to maximise green space in built areas, for wildlife and people - as well as to the **NEP’s Vision and Principles for the Improvement of Green and Blue Infrastructure across Buckinghamshire and Milton Keynes**, in planning for the provision of GI. We welcome the proposals that all new major development proposals should meet the Urban Greening Factor and Urban Tree Canopy Cover standards set by Natural England, and the use of best practice and guidance for their implementation, also (Para 223) that all new development proposals must protect existing woodland.
- **Explicit mention of taking account of, and using the planning system to support, delivery of the area’s (upcoming) Local Nature Recovery Strategy.** Guidance on the link between planning and the LNRS is imminent – and ensuring the LNRS is sufficiently taken into account in Local Planning is critical for nature recovery.
- **Biodiversity Net Gain** - the NEP would advocate increasing the minimum 10% gain to 20%, in line with thinking across the OxCam area and the previous Environment Principles that applied to it; also that the gain should be provided long term, into perpetuity.

We set out below how these key areas of focus are relevant to specific sections of the draft plan, and look forward to seeing them considered and incorporated.

We would be happy to discuss any of the above or our detailed response.

Best wishes.

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¹ [The NEP’s "Forward to 2030: Biodiversity Action Plan for Buckinghamshire and Milton Keynes"](#)

² Biodiversity Opportunity Areas, or “BOAs” are identified in the area’s BAP (per footnote 1 above, at page 112 of the BAP) as the key focus areas for creation of ecological networks and a targeted landscape-scale approach to conserving biodiversity.

SUGGESTIONS BASED ON THE ABOVE AREAS OF FOCUS IN THE DRAFT PLAN:

(Suggested ~~deletions~~ and *additions*)

2) Our ambition and objectives for growth: need more emphasis on space for nature integrated into provision of infrastructure and high quality homes

Ambition 2.1

Q1a, b and c: Our ambition and objectives for growth

In relation to the ambition and objectives, we have several comments:

Ambition

“...green and valued open spaces” – to add “including high quality connected places for nature”

Para 3, bullet 4:

“Providing quality open and green space, including high quality connected spaces for nature, schools and services in the right places creates a sense of community and belonging and encourages physical activity, which we know improves physical and mental health.

Our Objectives 2.2

People-friendly and healthy places

Objective 2:

“Create green streets and neighbourhoods that...and parks and open space including high quality natural areas for wildlife”.

Climate and Environmental Action:

Objective 7:

“Create high-quality and connected space for nature and deliver significant gains in biodiversity”

Objective 8

“Ensure that communities and nature can cope with and bounce back from negative climate impacts and environmental change. Use nature-based solutions such as specifically designed areas of planting to help reduce climate impacts and risks.”

3) Our growth strategy

Q2a, b, c: Policy GS1 Our Spatial Strategy

In relation to the draft policy, we have several comments in relation to the supporting text, notably:

Para 6 – Taking an “infrastructure” first approach...bullet one:

To emphasise that such infrastructure must also include provision of green and blue infrastructure as a necessary infrastructure in support of health, education and the community, and just as important as traditional “built” infrastructure to supporting communities, we would suggest adding in:

*“... in delivering new high quality, **and accessible**, green spaces and play areas, **which connect and give access to nature, with management secured into the future**”*

Para 21 – regarding concept statements to assist the delivery of strategic allocations, we request that consideration is also given to how nature-based solutions are incorporated into flood risk management and suggest an addition to reflect this, at the second bullet:

*“How water management or flood risk considerations, **including the use of nature-based solutions**, might direct built development within a site”*

We also ask that the following point is added to the guidance following the Concept Statement and the Infrastructure Study and Strategy:

“How spaces important for nature can be protected and enhanced, providing high quality connected corridors for wildlife and giving people access to nature”

3.4 Creating people friendly and healthy places

Box beneath Para 44, “People Friendly and Healthy Places”

*“We have proposed policies that are based on the design principles of safe and slow residential streets; high quality walking, wheeling, cycling and scooting networks; abundant green planting; meeting people's needs at all stages of life; mixed-use building patterns; frequent and accessible public transport; and public spaces for all, **including space for nature managed into the long term**. These principles will apply to all new developments in Milton Keynes, including new housing, employment and local centres”*

Supporting text:

Para 45 – we welcome reference to “healthy food options”.

To reduce carbon mileage and increase people’s connections with their local environment, we would recommend recognising “local” food sources too:

*“...by promoting access to healthy **local** food options...”*

Q5a, b, ac – Policy GS4 – Strategy for people friendly and healthy places

Supporting text:

“Para 48 and Table 3 – the framework of community amenities and catchment distances must include ref to Green Infrastructure:”

Alongside community amenities and catchment distances, we advocate explicit commitment and adherence to applying the **Natural England Green Infrastructure framework and evaluation** at Para 48 and Table 3 to support development of MK as a green city of the future.

Use of this tool in planning MK ahead would work help increase the amount of green cover, access to good quality green and blue space, such as woodlands wetlands, parks and rivers, within 15 minutes' walk of people's homes – and provide health, climate change and many environmental benefits alongside benefits to wildlife. The purpose of the framework is to embed nature into new development, increase the extent and connectivity of nature-rich habitats and increase wildlife populations, as well as to build resilience to climate change into the future. Given its alignment to the ambition of MK, we would strongly encourage the use of the GI tools, principles, standards and design guidance in MK planning – e.g. the urban nature recovery standard; the urban greening factor; the tree canopy cover standards; accessible greenspace standards.

As stated in the standard:

“as a comprehensive tool, the GI Framework and accompanying Design Guide will support local planning authorities and developers design and create more nature-rich urban greenspaces to meet mandatory BNG requirements and support the development of the Nature Recovery Network.”

Policy GS4 – We would welcome inclusion of the importance of Green Infrastructure provision in the policy itself, taking into account our suggestions in the supporting text, above.

Policy GS9 – supporting growth with infrastructure

We would encourage more emphasis on provision and long-term maintenance of green and blue infrastructure for benefits to wildlife and people in this policy. For example:

*“E) Proposed **long-term management and maintenance arrangements for green and blue** infrastructure must secured be set out clearly as part of a development proposal
F) “Linear Parks should be integrated into any strategic urban extension of the city.
These should:*

- *Protect and enhance the landscape character of the city;*
- *Protect and enhance features of nature conservation value – including maximising connections to existing green areas for nature;*
- *Retain and improve public access to land and water areas for recreation;*
- *Provide flood control and attenuation; and*
- *Protect the setting of any designated heritage asset and interpret areas of archaeological interest.”*

This policy should also include a commitment to adhering to the standards in the Natural England Green Infrastructure Framework, which supports the greening of towns and cities and surrounding landscapes, and sets principles and standards for good green infrastructure.

We would also encourage explicit reference to the NEP’s GI Vision and principles framework in the supporting text, as in the existing Plan:MK. This set out a series of principles that should be applied to provide a connected network of high quality, wildlife-rich GI providing or nature and people: (where the term “GI” includes blue infrastructure). In summary, the NEP’s principles are:

- Recognition of the importance and necessity of GI provision - as important as traditional built and social infrastructure for the health and wellbeing of our communities;
- Plan for GI early and strategically at all spatial scales of development
- Plan GI to provide a range of ecosystem services benefits – e.g. provision for wildlife but also for e.g. clean air, water quality and flow, carbon storage, food production and access / health and wellbeing benefits.
- Long term management of GI is essential – including working across borders (as nature does not adhere to them)
- Connect networks of GI at all scales to maximise the benefits
- Provide a wildlife-rich GI network – for wildlife, access and multiple benefits – but where sensitive sites are protected from disturbance.

6) People-friendly and healthy places

Q29a, b, c – delivering a healthier food environment

We would encourage **including aims to provide local food and so reduce food miles** into the consideration of food choice in this policy, as well as the location of food growing facilities and hot food takeaways. Lower food miles are better for the climate and environment and so to all of us and our health.

Whilst we welcome the access to food growing policy PFHP4, we would encourage consideration of the explicit mention of community food-growing facilities, including community orchards into the policy as part of the reference to “urban food growing spaces”.

Para 130 in the supporting text could therefore put more emphasis on :

- i) provision of urban food growing spaces for growing food *together* – and so recognising how the social connectivity and community benefits already mentioned can actually arise – i.e. rather than just providing space for individual food growing without reference to areas where this can be done collectively; and
- ii) the climate benefits of local food growing.

*“130. Community Food Infrastructure, such as allotments and urban food growing, **and community-wide food growing spaces such as community orchards, are-is also a-key***

components of the Food Environment. It is recognised that access to food growing can improve attitudes towards healthier eating, improve opportunities for fruit and vegetable consumption, as well as improve social connectivity and physical activity, and reduce food miles and so climate impacts. Allotment provision is not evenly distributed across the city, and some of our more deprived areas are also less likely to have access to allotments. Food growing facilities are pieces of equipment that can be used for food growing, such as planters, raised beds, and greenhouses.”

6.4 (Urban design principles for people-friendly and healthy places) and 6.5 (healthy Streets)

Q31a-c and Q31 a-c

Policy PFHP5 Designing People Friendly Places and PFHP6 Designing Healthy Streets

Here again we would expect explicit acknowledgement of the commitment to apply Natural England’s Green Infrastructure Framework for the design of people-friendly places to ensure sufficient coverage of green space, canopy cover, street trees and community green spaces such as wildlife planters and urban greening and to ensure accessible green space standards are met for provision of natural greenspace within 15 minutes’ walk of people’s homes.

6.7 A new MK Design Code (Q33a and b)

We would expect here a commitment to, and more emphasis on, Green Infrastructure and provision for nature and wildlife within the design code vision, alongside easy access to natural areas of greenspace.

For example:

“A Design Code which delivers healthy and people friendly places that provide more choice for movement and build on the city’s legacy of connectivity, including its green and blue infrastructure. These healthier places will prioritise walking, wheeling, scooting and cycling, integration of nature into people’s everyday lives and support the use of integrated and sustainable transport to achieve accessible and inclusive mobility for all in Milton Keynes.”

8) Climate and environmental action

8.1 – Policy CEA1 - Sustainable buildings

(Policy CEA1 Sustainable Buildings, Para F)

Q43 a and b

We welcome the ambition of the Plan to set embodied carbon targets for major developments, to implement the energy hierarchy and for the analysis of embodied carbon for demolition and redevelopment, as part of the MK ambitions for net zero. We also

welcome the use of the Carbon offset Fund to invest in energy reduction and renewable energy.

In addition, we would urge the Council to use the Carbon offset Fund to also fund nature-based solutions for carbon offset projects, as well as for investment in energy reductions and renewable energy installations.

Policy CEA2 Green Roofs and Walls

Q 44a-c

We welcome this addition for green roofs and walls in appropriate circumstances on new residential apartment blocks, offices and non-residential buildings. We would also like the plan to look favourably on green roofs and walls on residential buildings, and to clarify the meaning of “feasible and viable” in its policy or accompanying text.

Policy CEA4 Retrofitting

Policy CEA7 Mitigating wider environmental impacts

There are several terms throughout the policy that are not defined and so open to interpretation that should be made more robust, or expectations set out, or otherwise more clearly define what would and would not be allowed:

- a. Includes the term “unacceptable impact” - what would be deemed “unacceptable”?
- c. Development resulting in soil and water pollution should be avoided or mitigated to an “acceptable level”. What is the definition of “acceptable”?
- d. “unacceptable” impacts of air pollution on the natural environment
- j. “no unacceptable adverse impacts” on species, habitat or wider natural environment

8.4 – Providing and protecting our valued green spaces

Policy CEA8 Provision and protection of accessible open space

(Q50a-c)

In respect of the following policy sections:

A - We welcome the integration of access and recreation routes into wider nature, GI and BI network. But part A of the policy should add that all new development proposals should provide areas of natural greenspace also connected into the existing networks. Provision for their long-term management and maintenance should also be required.

B – should make specific mention of the NE GI Framework and access to open space targets rather than just reference to “open space standards” in relation to quantity, accessibility and catchment area for the provision of open spaces”.

C (II) – the management and maintenance strategy should include the need for “long term” management and maintenance including action in circumstances of a change of ownership.

E(II) – the loss of open spaces should include an assessment of the impacts on nature. This may at least partly come from statutory BNG requirements.

BNG CEA9 – Biodiversity and habitats network

We welcome mention in the policy at A that development proposals providing a higher than 10% BNG will be strongly supported subject to other habitat, species and landscape proposals. However, we would welcome further encouragement for development to provide a specified minimum 20% net gain, in line with good practice in other parts of the country, and also require long-term gains, into perpetuity.

We also welcome mention of the LNRS in the supporting policy text at Para 209. In anticipation of the guidance from government of how planning should “have regards” to the LNRS, we encourage a sign-post in the supporting text to adhering to the upcoming guidance, to support nature recovery via the planning system.

Policy CEA10 Protection and enhancement of environmental infrastructure network, Priority Species and Priority Habitats

Q52a-c

Supporting text Para 211 – this should make mention of the NEP’s GI Vision and Principles alongside the MK Nature, green and Blue Infrastructure Strategy (see above as for Policy GS9, pages 5-6)

We welcome in the policy at D mention of local wildlife sites, biodiversity notification sites, BOAs and MK wildlife sites among other listed sites.
