

## Response to the Buckinghamshire Local Plan Vision and Objectives consultation

(by email to: [planningpolicyteam.bc@buckinghamshire.gov.uk](mailto:planningpolicyteam.bc@buckinghamshire.gov.uk) )

### Introduction

The Buckinghamshire and Milton Keynes Natural Environment Partnership (the NEP) is grateful for the opportunity to comment on the Buckinghamshire Local Plan Vision and Objectives consultation.

An essential underlying goal of a Local Plan should be to support, manage and protect natural capital to allow it to provide the broadest spectrum of ecosystem services. In this way, the environment is an economic asset and driver of growth to the Buckinghamshire economy, and it contributes to physical health and mental wellbeing of our Buckinghamshire societies. We have made comments in the Table below on the proposed vision and objectives from this viewpoint, in line with the NEP's major areas of work, strategies and plans that have been collaboratively produced by our partners.

### Summary

In summary, the NEP would like to see a more ambitious vision and proposed objectives for the Buckinghamshire environment in the new Local Plan. The NEP's response points out where objectives should be strengthened to meet current national and local policy objectives around the need for more, better and more joined areas of habitat and local nature recovery to really make a difference to the twin crises of biodiversity decline and climate change. Looking ahead to 2040, it is even more important to be more ambitious than even current policy requirements. For example:

- In line with the [Buckinghamshire Growth Board's Strategic Vision Roadmap to 2050](#), the Government's new mandatory need to produce local nature recovery strategies and the anticipated adoption of these during the Local Plan period, and existing NEP strategies and policies referred to in previous Local Plans (e.g. our [Vision and principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes](#), and the [NEP's Biodiversity Action Plan – "Forward to 2030"](#) ) we believe the Council should be driving significant and ambitious local nature recovery through protection, enhancement, creation and enlargement, and investment in our natural assets to provide multiple benefits into the future – not just "supporting" nature recovery - and not just through a focus on tree planting.

# Buckinghamshire & Milton Keynes Natural Environment Partnership



- We also point out that the nationally accepted ([National Planning Policy Guidance, Natural Environment, Para 4; and the new Natural England Green Infrastructure Framework](#)) definitions of Green infrastructure, for example, do not include “cycleways” or “footpaths”, which, by definition, would not always be “green” or provide the benefits that green infrastructure can to people and wildlife.
- And we ask for better connectedness between environmental policy objectives and the various housing, transport, employment and wider economic objectives, so that they support each other and do not work in silos. For example, there are various suggestions to input green objectives where appropriate into the objectives around climate change, housing and quality of place.
- The new [Natural England Green Infrastructure Framework](#) includes a headline GI standards on accessible greenspace, urban nature recovery, urban greening and urban tree canopy cover, among others. The vision and objectives of the Local Plan must meet the standards published in the new Framework to ensure the Plan delivers what is considered to be “good green infrastructure”, so that Buckinghamshire’s green infrastructure is planned well to deliver multiple benefits to all.
- Within the health and wellbeing objective, we would also like to see recognition of the importance of access to areas of natural green space and social prescribing. GPs are increasingly seeing patients for non-medical issues, such as loneliness and isolation, and, given the strength of research linking positive health and wellbeing with access to nature, the objectives in the Local Plan should at least recognise this as an area of need over the next 15-20 years in Buckinghamshire, as some other authorities are.

We would be happy to discuss any aspects of our response and look forward to a strengthened vision and set of objectives for the Buckinghamshire environment as the Local Plan process continues.

**Our response to the specific questions posed in the consultation are provided below.**

**Our detailed response to Q 11 in the Local Plan consultation and Q18 in the Local Transport Plan consultation is set out below in the Tables that follow.**

# Buckinghamshire & Milton Keynes Natural Environment Partnership



Our response to the specific questions posed in the consultation are provided below.

Our detailed response to Q 11 in the Local Plan consultation and Q18 in the Local Transport Plan consultation is set out below in the Tables that follow.

1. Do you want to respond to the Local Plan for Buckinghamshire vision and objectives?

✓ Yes

## The Local Plan for Buckinghamshire vision

2. Do you agree with the draft local plan vision?

✓ No

## The Local Plan for Buckinghamshire objectives

3. Do you agree with the 'Natural and built environment' objective for the local plan?

✓ No

4. Do you agree with the 'Mitigating / adapting to climate change' objective for the local plan?

✓ No

5. Do you agree with the 'Provision of homes' objective for the local plan?

✓ No

6. Do you agree with the 'Quality of place' objective for the local plan?

✓ No

7. Do you agree with the 'Community health and wellbeing' objective for the local plan?

✓ No

8. Do you agree with the 'Infrastructure' objective for the local plan?

✓ No

9. Do you agree with the 'Economy and jobs' objective for the local plan?

✓ No

10. Do you agree with the 'Transport, physical and digital connectivity' objective for the local plan?

✓ No

## The Local Plan for Buckinghamshire vision and objectives

11. Please tell us the reasons for your answers about the Local Plan for Buckinghamshire vision and objectives:

If you think there's anything else that should be included in the Local Plan for Buckinghamshire, please tell us here.

**Please see the detailed Table, (Table 1), below.**

## 12. How important are the 8 draft objectives to you?

*Rank the objectives in order of importance – where 1 is most important to you.*

1. Natural and built environment
2. Mitigation / adapting to climate change
3. Quality of place
4. Community health and wellbeing

### **Comments**

The objectives are not mutually exclusive. E.g. “natural and built environment” is vague and should include the “climate change” objective too. Votes for either of these should be considered a vote for nature in determining what stakeholders want.

## Local Plan – Vision and Objectives: detailed response from the NEP (answers to Q 11 and Q18)

Table 1 NEP's inclusions for the Local Plan and explanations;

(wording to improve; suggested additions / deletions)

Section	Current wording (highlighting wording to improve)	Suggested changes to current wording (additions / deletions)	Reason for change	Policy References
<b><u>Overall Vision to 2040</u></b>	<i>"We have <u>maintained</u> the Chilterns Area of Outstanding Natural Beauty (AONB) and other <u>valued local landscapes</u> from harmful development, and <u>enlarged both the AONB and the Green Belt</u> where justified."</i>	<i>"We have <u>maintained</u> the Chilterns Area of Outstanding Natural Beauty (AONB) and other valued local landscapes <u>and habitats</u> from harmful development, <u>and protected, improved, connected and enlarged both the AONB and the Green Belt</u> <del>them</del> <u>where justified in line with the urgent need to improve resilience to Climate Change and tackle Biodiversity decline</u>".</i>	<p><b>"Maintained"</b> In line with the well-known Lawton Principles and local policy and strategy – notably the NEP's Biodiversity Action Plan objectives for Bucks and MK - the Local Plan vision should also emphasise creating, improving, extending and connecting areas of biodiversity and habitats ("more, bigger, better and more joined up) aiming to reverse biodiversity decline – not just "maintain" the AONB, Green Belt and valued local landscapes – or "enlarge" them. These terms say nothing about improving the biodiversity quality or connectivity of habitats. Being more ambitious would be more in line with the Bucks Growth Board Strategic Vision to 2050.</p> <p><b>"Enlarged"</b> The Plan should also be more ambitious, in line with the same policies, in respect of aiming to just "enlarge" the AONB and Green Belt "where justified".</p>	<p><a href="#">NEP's Biodiversity Action Plan – "Forward to 2030"</a> – which covers Bucks and MK</p> <p><a href="#">Buckinghamshire Growth Board's Vision for Buckinghamshire to 2050</a> – this stages that between 2025-2040 we will "increase delivery of biodiversity net gain to at least 20%" . And by 2025 to "...invest in environmental protection, enhancement and creation whilst exploring the</p>

# Buckinghamshire & Milton Keynes Natural Environment Partnership



Section	Current wording (highlighting wording to improve)	Suggested changes to current wording (additions / deletions)	Reason for change	Policy References
			<p>Enlargement should at least apply to a broader geography – to other “valued local landscapes” and habitats, beyond just the two designations, and, again, improve these for wildlife (not just make them bigger) and connect them with other habitat through corridors and stepping stones, to improve resilience to pressures such as climate change and development.</p> <p><u>“Valued local landscapes” is not well defined and risks multiple interpretations. For clarity, the statement should therefore explicitly refer to habitats too.</u></p> <p><u><i>Overall</i></u> The suggested changes make clear that protecting, improving, connecting and enlarging are all needed to reverse the twin crises of biodiversity decline and climate change. The changes also make it clearer that the vision applies not just to the AONB and Green Belt but the other, so-called – valued “local landscapes”, including valued habitats.</p> <hr/>	<p><i>priorities for delivering nature’s recovery in alignment with the Local Nature Recovery Strategy”.</i></p> <p>The NEP’s <a href="#">Vision and principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes</a></p> <p>Forthcoming Local Nature Recovery Strategy (LNRS) for Buckinghamshire and Milton Keynes</p> <p><a href="#">Natural England Green Infrastructure Framework – states that “</a>  <i>“nature-based solutions, or protecting, restoring and better managing ecosystems for the</i> </p>

# Buckinghamshire & Milton Keynes Natural Environment Partnership



Section	Current wording (highlighting wording to improve)	Suggested changes to current wording (additions / deletions)	Reason for change	Policy References
				<i>benefit of people and biodiversity., gives the framework to tackle the twin climate and nature crises in an integrated way..."</i>
	<i>Buckinghamshire is mitigating and adapting to climate change through the enhancement of valued local landscapes, supporting local nature recovery, significant new tree planting and natural habitat creation.</i>	<i>Buckinghamshire is mitigating and adapting to climate change through the enhancement of valued local landscapes, and driving ambitious and significant supporting-local nature recovery,- including significant new tree planting and natural habitat restoration and creation, looking after nature long into the future.</i>	<p><u>"Supporting"</u> In line with the current NEP's Biodiversity Action Plan, and the forthcoming Local Nature Recovery Strategy, Buckinghamshire should be doing by 2040 than just "support" local nature recovery. It should be driving it - for the benefit of the economy, communities and wildlife that depend on nature, and to protect and enhance the wide-ranging benefits derived from our local nature – such as clean air, reduced flood risk, water quality, provision for wildlife and health and wellbeing benefits of accessible green space.</p> <p><u>"Significant"</u> should be clearly referring equally to natural habitat creation as it is to new tree planting. New tree planting is not always the panacea for reversing biodiversity decline nor the ongoing provision of natural capital services and benefits, as the right trees must be planted in the right place and maintained into the long-term; in some</p>	<p><a href="#">NEP's Biodiversity Action Plan – "Forward to 2030"</a> – which covers Bucks and MK</p> <p><a href="#">Buckinghamshire Growth Board's Vision for Buckinghamshire to 2050</a> – by 2025, to "invest in environmental protection, enhancement and creation whilst exploring the priorities for delivering nature's recovery in alignment with the Local Nature Recovery Strategy".</p>

# Buckinghamshire & Milton Keynes Natural Environment Partnership



Section	Current wording (highlighting wording to improve)	Suggested changes to current wording (additions / deletions)	Reason for change	Policy References
			<p>places wider benefits may be achieved with different habitat creation.</p> <p>Restoration is a target in the NEP Biodiversity Action Plan, Defra's 25 year plan, and important for the county's rivers, in particular our internationally- important chalk streams, which cannot be "created" anew. Restoration targets should be linked to Local Plans</p> <p>Any new habitat must be planned for and planted in the right place, at right time, and maintained into the long-term. The suggested changes make this clear.</p> <p>Increasing the level of ambition in the proposed Local Plan objective will be necessary in order to meet the Buckinghamshire Strategic Vision set out by the Growth Board by 2040 – and strive towards the 2050 natural environment goal (bold added): <b>"Buckinghamshire's environment will be in good condition and become a leading example of best practice and policies in environmental protection as well as enhancement, creation and connections"</b></p>	
	<p>(Re new employment sites for businesses to grow...)</p> <p>"Together, these have been built to high environmental standards in carefully</p>	<p>"Together, these have been built to high environmental standards in carefully chosen locations best able to accommodate growth and support local</p>	<p>The changes suggested reflect local policy – and the need to join up local policy ambitions between climate change, biodiversity and nature with planning and economic growth. The choice of locations</p>	<p><a href="#">NEP's Biodiversity Action Plan – "Forward to 2030"</a> – which covers Bucks and MK</p>



# Buckinghamshire & Milton Keynes Natural Environment Partnership



Section	Current wording (highlighting wording to improve)	Suggested changes to current wording (additions / deletions)	Reason for change	Policy References
	<i>chosen locations best able to accommodate growth...</i>	<i>nature recovery...</i>	for employment growth should consider impacts on local nature recovery, as well as growth potential.	<a href="#">Buckinghamshire Growth Board's Vision for Buckinghamshire to 2050</a> – by 2025, to “invest in environmental protection, enhancement and creation whilst exploring the priorities for delivering nature’s recovery in alignment with the Local Nature Recovery Strategy”.  Forthcoming Local Nature Recovery Strategy (LNRS) for Buckinghamshire and Milton Keynes
	<i>High-quality mixed-use developments have revitalised our town centres... delivering public realm and local transport improvements.</i>	<i>“High-quality mixed-use developments have revitalised our town centres e.g. those of Aylesbury, High Wycombe, Chesham, Buckingham and Princes Risborough, delivering public realm a sense of pride and place, including through greening our urban areas in line</i>	“Delivering public realm” is not clear to all audiences. Suggestion is for clarity and to bring in line with the local environmental policies ad strategies as previously outlined.	

# Buckinghamshire & Milton Keynes Natural Environment Partnership



Section	Current wording (highlighting wording to improve)	Suggested changes to current wording (additions / deletions)	Reason for change	Policy References
		with climate and biodiversity goals, and providing local transport improvements"		
<b>Objective 1: Natural and Built Environment</b>	<p><b>Aim:</b> To conserve and enhance Buckinghamshire's valued natural, historic, and built environments, to ensure they are protected from inappropriate development.</p> <p>To achieve this objective, the local plan will: ...</p> <ul style="list-style-type: none"> <li>a. sustain the predominantly rural character of Buckinghamshire</li> <li>b. protect valued landscapes including the Chilterns Area of Outstanding Natural Beauty (AONB) and the Green Belt from inappropriate development</li> <li>c. conserve and enhance special places for nature and create a connected county-wide network of green and blue infrastructure which maximises opportunities for biodiversity net gain with the creation of new priority habitats and green infrastructure <ul style="list-style-type: none"> <li>o green infrastructure includes open spaces, parks, woods, footpaths and cycleways</li> <li>o blue infrastructure includes ponds, rivers, lakes and</li> </ul> </li> </ul>	<p><b>Aim:</b> To conserve and enhance Buckinghamshire's valued natural, historic, and built environments, to ensure they are protected from inappropriate development.</p> <p>To achieve this objective, the local plan will: ...</p> <ul style="list-style-type: none"> <li>a. sustain the predominantly rural character of Buckinghamshire</li> <li>b. protect valued landscapes including the Chilterns Area of Outstanding Natural Beauty (AONB), and the Green Belt, Local Wildlife Sites and Nature Reserves from inappropriate development.</li> <li>c. conserve and enhance special places for nature and create a connected county-wide network of green and blue infrastructure which maximises opportunities for biodiversity net gain with the expansion, connection and creation of new-priority and other valued habitats and green and blue infrastructure. <ul style="list-style-type: none"> <li>o green infrastructure</li> </ul> </li> </ul>	<p><u>Sub-objectives b and c</u> For clarity the vision should identify what a "valued" landscape is – not just the AONB and Green Belt, but other areas could be mentioned – e.g. Local Wildlife Sites, Nature Reserves and other areas valuable to wildlife.</p> <p>"Create" implies "new" so suggest "new" is removed for brevity.</p> <p>Priority habitats are not the only habitats needing to be conserved and enhanced - others should be too (e.g. species-rich grassland, native semi-natural woodland, scrub and edge habitats, wilder road verges and hedgerows and wildflower-rich meadows) and also be expanded and connected, in line with the NEPs BAP and Lawton Principles from national environmental policy.</p> <p><u>"Green infrastructure"</u> – the definition should <u>not include</u> reference to either "cycleways" or "footpaths" - which, by definition, are not always either "green" or provide the benefits that other GI can to people and wildlife.</p> <p>The suggested changes will bring the</p>	<p><a href="#">NEP's Biodiversity Action Plan – "Forward to 2030"</a> – which covers Bucks and MK</p> <p><a href="#">National Planning Policy Guidance, Natural Environment, Para 4</a></p> <p>Forthcoming Local Nature Recovery Strategy (LNRS) for Buckinghamshire and Milton Keynes</p>

# Buckinghamshire & Milton Keynes Natural Environment Partnership



Section	Current wording (highlighting wording to improve)	Suggested changes to current wording (additions / deletions)	Reason for change	Policy References
	floodplains	<p>should create and strengthen networks of habitats and includes <del>open</del> green spaces, parks, woods, allotments, street trees and green roofs; footpaths and cycleways</p> <ul style="list-style-type: none"> <li>blue infrastructure includes ponds, rivers, canals, lakes and floodplains</li> </ul>	definition here in line with <a href="#">National Planning Policy Guidance, Natural Environment, Para 4)</a> and the objectives of the new <a href="#">Natural England Green Infrastructure Framework</a>	
<b>Objective 2: Mitigating / adapting to climate change</b>	<p><b>Aim:</b> To ensure the delivery of sustainable development, mitigating climate change and adapting to the impacts on Buckinghamshire's environment.</p> <p>To achieve this objective, the local plan will:</p> <ul style="list-style-type: none"> <li>a. ...</li> <li>b. ...</li> <li>c. ...</li> <li>d. ...</li> <li>e. ...</li> <li>f. enable locally liveable neighbourhoods in new development and</li> </ul>	<p><b>Aim:</b> To ensure the delivery of sustainable development, mitigating climate change and adapting to the impacts on Buckinghamshire's environment.</p> <p>To achieve this objective, the local plan will:</p> <ul style="list-style-type: none"> <li>f. enable locally liveable neighbourhoods in new development and regenerated areas, including access to nature-rich green spaces close to where people live and work</li> </ul>	In f - " <i>locally liveable</i> " – for clarity, this should include reference to access to local green space in line with national standards and the new NE GI Framework – which includes the principle of creating accessible nature-rich spaces close to where people live and work.	<a href="#">Natural England Green Infrastructure Framework (2023) – Principles and Standards for England</a>

# Buckinghamshire & Milton Keynes Natural Environment Partnership



Section	Current wording (highlighting wording to improve)	Suggested changes to current wording (additions / deletions)	Reason for change	Policy References
	regenerated areas			
<b>Objective 3: Provision of homes</b>	<p><b>Aim:</b> To meet housing needs, increase housing affordability and tenure choice throughout Buckinghamshire, prioritising brownfield land development. To achieve this objective, the local plan will:</p> <ul style="list-style-type: none"> <li>a. provide a range of housing to meet local needs for market, affordable, accessible and specialist needs (such as Lifetime homes so people can stay in their homes for longer) while recognising the diversity in the character and context of our urban, suburban and rural areas</li> <li>b. enable the delivery of homes for key workers, people with local connections, and those seeking self- and custom-build opportunities</li> <li>c. ensure new housing is of high-quality design, low-carbon and digitally-enabled and in keeping with its surroundings</li> </ul>	<ul style="list-style-type: none"> <li>c. ensure new housing is of high-quality design, low-carbon, and digitally-enabled, with integrated biodiversity &amp; green infrastructure features, and provided with nature-rich, accessible green space and is in keeping with its surroundings,</li> </ul>	<p>“in keeping” with its surroundings – for clarity, this should fully link to existing national and local strategy and policy objectives aiming to improve access to green space and provide significant biodiversity gains.</p> <p>The additions bring the objective in line with existing policies for local green space and housing, including with the NEP’s Biodiversity Action Plan which looks to take all opportunities to integrate features for nature in development and building design – so this should at least form part of the future objective for 2040.</p> <p>The new Natural England Green Infrastructure Framework includes a headline standards on accessible greenspace, urban nature recovery, urban greening and urban tree canopy cover, among others. The new Framework should be adhered to and the objectives of the Local Plan must meet those standards to ensure what good green infrastructure looks like, how to plan it to deliver multiple benefits and enable benefits to all.</p>	<p><a href="#">NEP’s Biodiversity Action Plan – “Forward to 2030”</a> – which covers Bucks and MK</p> <p>The NEP’s <a href="#">Vision and principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes</a></p> <p><a href="#">Natural England Green Infrastructure Framework (2023) – Principles and Standards for England</a></p>
<b>Objective 4: Quality of place</b>	<b>Aim:</b> Create great places to live and work that function well, and are welcoming,	<ul style="list-style-type: none"> <li>e. secure a robust network of green and blue spaces across</li> </ul>	<p>“spaces” -</p> <p>For clarity and to align with national and</p>	<a href="#">National Planning Policy Guidance.</a>

# Buckinghamshire & Milton Keynes Natural Environment Partnership



Section	Current wording (highlighting wording to improve)	Suggested changes to current wording (additions / deletions)	Reason for change	Policy References
	<p>safe, and accessible to all. To achieve this objective, the local plan will:</p> <ul style="list-style-type: none"> <li>a. take inspiration from valued and unique characteristics of Buckinghamshire to deliver high quality design that reinforces Buckinghamshire's distinctiveness, while being innovative in design and construction</li> <li>b. enable self-contained neighbourhoods that are supportive of healthy lifestyles, easy to move through and easy to understand</li> <li>c. provide sufficient and well-integrated parking</li> <li>d. ensure development is built to high standards of sustainability and energy efficiency</li> <li>e. secure a robust network of spaces across Buckinghamshire for recreation, play, biodiversity, and water infrastructure, connecting into the rights of way network</li> </ul>	<p>Buckinghamshire for recreation, play, biodiversity, and water infrastructure, connecting into the rights of way network</p>	<p>local policy objectives, this should refer to <i>green</i> (and blue) spaces, not just "spaces".</p>	<p><a href="#">Natural Environment, Para 4</a></p> <p>And</p> <p>2) The <a href="#">Natural England Green Infrastructure Framework</a></p> <p>The NEP's <a href="#">Vision and principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes</a></p>
<b>Objective 5: Community health and wellbeing</b>	<p>Aim: To support sustainable communities throughout Buckinghamshire, by improving health care facilities and access to them – supporting physical and mental health, and social and cultural</p>	<ul style="list-style-type: none"> <li>b. work with health providers to ensure appropriate local health facilities and access to them (and deliver new ones where they are needed), including recognition of the</li> </ul>	<p>There is a wealth of research linking physical and mental health and wellbeing with access to and time spent in nature.</p> <p>Other authorities are starting to make headway with green social prescribing in</p>	<p><a href="#">NEP's Biodiversity Action Plan – "Forward to 2030"</a> – which covers Bucks and MK</p>

# Buckinghamshire & Milton Keynes Natural Environment Partnership



Section	Current wording (highlighting wording to improve)	Suggested changes to current wording (additions / deletions)	Reason for change	Policy References
	<p>wellbeing for residents.</p> <p>To achieve this objective, the local plan will:</p> <ul style="list-style-type: none"> <li>a. create places that support active lifestyles and good physical and mental health through people-friendly streets, open and green spaces, and play areas</li> <li>b. work with health providers to ensure appropriate local health facilities and access to them (and deliver new ones where they are needed)</li> <li>c. provide new or enhanced sport, leisure and cultural facilities where needed, (improve access to existing)</li> <li>d. improve air quality in Air Quality Management Areas – these are locations where the air pollution levels exceed safe levels</li> </ul>	<p>importance of access to areas of natural green space and social prescribing for mental and physical health and wellbeing.</p>	<p>recognition of this. This offers a way to help free-up GP appointments and improve the mental and physical health of Bucks residents and workers.</p> <p>The objectives here should at least recognise this as an area of need over the next 15-20 years.</p>	
<b>Objective 6: Infrastructure</b>	<p><b>Aim:</b> To ensure the right infrastructure required to support communities is provided in the right place and at the right time, and make best use of existing facilities. To achieve this objective, the local plan will:</p>	<p>d. provide, enlarge, improve connect and look after green and blue infrastructure to enhance the landscape and biodiversity and ensure that multiple GI benefits are provided into the future</p>	<p>Green and blue infrastructure must be maintained and looked after into the long-term to protect and enhance the multiple benefits derived from it for people and wildlife.</p> <p>The suggestions here bring the objective in line with the nationally-recognised “Lawton</p>	<p><a href="#">Environmental Improvement Plan (2023) – UK Government</a></p> <p><a href="#">NEP’s Biodiversity Action Plan – “Forward to 2030”</a></p>

# Buckinghamshire & Milton Keynes Natural Environment Partnership



Section	Current wording (highlighting wording to improve)	Suggested changes to current wording (additions / deletions)	Reason for change	Policy References
	<ul style="list-style-type: none"> <li>a. facilitate wider connectivity across Buckinghamshire and beyond</li> <li>b. ensure improved local connections within and between settlements</li> <li>c. provide appropriate social infrastructure including for health, education, skills training, sports, recreation and other community facilities</li> <li>d. <b>provide and connect</b> green and blue infrastructure to <b>enhance the landscape</b> and biodiversity</li> <li>e. create safe and vibrant public spaces in towns and villages</li> <li>f. provide flood risk mitigation and sustainable urban drainage solutions</li> <li>g. ensure the provision of energy, water and other utilities, and manage waste of all kinds</li> </ul>	<ul style="list-style-type: none"> <li>h. provide flood risk mitigation and sustainable urban drainage solutions <b>which maximise the use of nature based solutions and enhance biodiversity</b></li> </ul>	<p>Principles”, echoed in the recent UK Government Environmental Improvement Plan (see Delivery Plan section, for example); and with the local NEP’s GI Vision and Principles – which includes striving for wildlife-rich nature demonstrating high standards of protection, enhancement, creation and long-term management of species-rich features.</p> <p>“Enhancing” the landscape should be explained – the addition suggests infrastructure is enhanced for biodiversity and the multiple benefits of GI. Improving biodiversity, so that areas of local green spaces are wilder and more biodiverse, supports the NEP’s Forward to 2030 Biodiversity Action Plan objectives and in providing wider environmental benefits, would also support local nature recovery in the upcoming Local Nature Recovery Strategy.</p> <p>Flood risk mitigation and SUDs should be regarded as opportunities - ensure they provide benefits for wellbeing and biodiversity, and opportunities for communities to connect with nature, alongside managing water.</p>	<p>– which covers Bucks and MK</p> <p>The NEP’s <a href="#">Vision and principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes</a></p> <p>Forthcoming Local Nature Recovery Strategy (LNRS) for Buckinghamshire and Milton Keynes</p> <p><a href="https://www.gov.uk/government/news/new-approach-to-sustainable-drainage-set-to-reduce-flood-risk-and-clean-up-rivers">https://www.gov.uk/government/news/new-approach-to-sustainable-drainage-set-to-reduce-flood-risk-and-clean-up-rivers</a></p> <p>‘The benefits of sustainable drainage systems are many – from mitigating flood risk... to enhancing local nature in the heart of our</p>

# Buckinghamshire & Milton Keynes Natural Environment Partnership



Section	Current wording (highlighting wording to improve)	Suggested changes to current wording (additions / deletions)	Reason for change	Policy References
				developments...'
<b>Objective 7: Economy and jobs</b>	<p><b>Aim:</b> To diversify and expand the economy by delivering the right employment opportunities in the right places, supporting economic recovery, regenerating town centres and enabling delivery of education, training and skills to enhance the employability of Buckinghamshire residents.</p> <p>To achieve this objective, the local plan will:</p> <ul style="list-style-type: none"> <li>a. enhance our economic assets by supporting Enterprise Zones, strategic and locally important employment areas</li> <li>b. support and enhance Buckinghamshire's strengths in high tech, medical tech, space innovation and creative and digital, including through the provision of skills training centres</li> <li>c. designate employment spaces that support a diverse range of commercial activity, from high quality offices to local workshops</li> <li>d. seek opportunities to link residential and commercial development to encourage local living</li> </ul>	<ul style="list-style-type: none"> <li>f. support the regeneration and greening of town centres for a diverse range of uses</li> <li>g. support a sustainable rural economy including sustainable, nature-friendly agriculture and farm diversification, and safeguard food security</li> </ul>	<p>In f) Regeneration of town centres should include greening town centres by 2040 – in line with national and local plans, policies and frameworks, linking planning and environmental policies and nature recovery ambitions locally, and provide wide-ranging benefits to communities and workers.</p> <p>e.g. the NEP' Biodiversity Action Plan, GI Vision and Principles and the new Natural England Green Infrastructure Standards (<a href="#">see summary here</a>) should be adhered to within the new Buckinghamshire Local Plan.</p> <p>For example, the new NE Framework includes standards on:</p> <ul style="list-style-type: none"> <li>• GI strategy – that local authorities, working in partnership with stakeholders and communities, assess and strategically plan their GI provision and set out how to create “...greener, beautiful, healthier and more prosperous neighbourhoods with a thriving nature network....and apply the 15 GI Principles and the GI Standards locally”.</li> <li>• accessible greenspace – to be close to home for health and wellbeing and contact with nature;</li> </ul>	<p><a href="#">NEP's Biodiversity Action Plan – “Forward to 2030”</a> – which covers Bucks and MK</p> <p>The NEP's <a href="#">Vision and principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes</a></p> <p><a href="#">Natural England Green Infrastructure Framework (2023) – Principles and Standards for England</a></p>



# Buckinghamshire & Milton Keynes Natural Environment Partnership



Section	Current wording (highlighting wording to improve)	Suggested changes to current wording (additions / deletions)	Reason for change	Policy References
	<p>e. locate new employment close to good transport connections where possible</p> <p>f. support the regeneration of town centres for a diverse range of uses</p> <p>g. support a sustainable rural economy including sustainable agriculture and farm diversification, and safeguard food security</p>		<ul style="list-style-type: none"> <li>urban nature recovery - to increase GI designed and managed for nature recovery by an agreed percentage;</li> <li>urban greening – to at least 40% on average in urban residential neighbourhoods</li> <li>urban tree canopy cover – And the need for “long term management and maintenance” to underpin all the standards.</li> </ul> <p>In g) for clarity, include “nature-friendly” rather than just “sustainable” agriculture.</p>	
<b>Objective 8: Transport, physical and digital connectivity</b>	<p><b>Aim:</b> To improve connectivity across and between Buckinghamshire towns and villages with regional and national centres beyond by securing new sustainable transport infrastructure, upgrading existing infrastructure and improving digital connectivity.</p> <p>To achieve this objective, the local plan will:</p> <p>a. maximise the connectivity opportunities presented by large-scale strategic transport schemes such as East West Rail to focus the location of growth and encourage inward investment in</p>	<p>a. maximise the connectivity opportunities presented by large-scale strategic transport schemes such as East West Rail to focus the location of growth and encourage inward investment in Buckinghamshire, including towards green and blue infrastructure needs</p> <p>b. create safe and attractive walking and cycling routes, designed to contribute to wider nature recovery goals, as the first choice for shorter journeys for those who are able</p>	<p>a. Suggested changes are to bring the wording in line with NEP Vision and Principles for the Improvement of GI in Bucks and MK. The principles state the need to recognise the importance of green infrastructure on a par with traditional built “grey” infrastructure in terms of delivering wider benefits to meet the needs of communities across Bucks.</p> <p>b. It is important to link local transport policy, such as encouraging modal shift to cleaner forms of transport, with local environmental policies and ambitions, such as the <a href="#">NEP’s Vision and principles for the Improvement of GI across Bucks and MK.</a></p>	<p>The NEP’s <a href="#">Vision and principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes</a></p> <p><a href="#">Natural England Green Infrastructure Framework (2023) – Principles and Standards for England</a></p>

# Buckinghamshire & Milton Keynes Natural Environment Partnership



Section	Current wording (highlighting wording to improve)	Suggested changes to current wording (additions / deletions)	Reason for change	Policy References
	<p>Buckinghamshire</p> <ul style="list-style-type: none"> <li>b. create safe and attractive walking and cycling routes as the first choice for shorter journeys for those who are able</li> <li>c. diversify, extend and enhance public transport provision including planning for low-carbon innovations, facilitating changes of mode to complete car-free journeys</li> <li>d. facilitate effective transport solutions for those with mobility challenges</li> <li>e. direct road freight to the most appropriate routes and plan for facilities that support sustainable freight activity (e.g. consolidation centres and community delivery hubs) and first mile / last mile solutions</li> <li>f. support the provision of digital infrastructure to the most remote parts of Buckinghamshire</li> <li>g. deliver low or zero carbon fuel infrastructure through new development</li> </ul>		<p>The suggested changes make it clear that GI is not just about being “attractive” but is necessary to provide multiple benefits to people and wildlife.</p> <p>Such “ecosystem services” include the provision of local shade and cooling, better air quality, flood risk reduction, carbon sequestration, pollination, space for wildlife and access for health and wellbeing benefits and many more.</p> <p>Recognition of this here is to bring it in line with the NEP’s GI Vision and Principles and the new Natural England GI Framework for planning effective GI strategy.</p>	

# Buckinghamshire & Milton Keynes Natural Environment Partnership



## Local Transport Plan

13. Do you want to respond to the Local Transport Plan 5 (LTP 5) vision and objectives?  
✓ Yes
14. Do you agree with the draft Local Transport Plan 5 vision?  
✓ No
15. Do you agree with the 'Connecting our economy' objective for the Local Transport Plan 5?  
✓ No
16. Do you agree with the 'Decarbonising our transport system' objective for the Local Transport Plan 5?  
✓ No
17. Do you agree with the 'Building places for people' objective for the Local Transport Plan 5?  
✓ No
18. Please tell us the reasons for your answers about Local Transport Plan 5 vision and objectives:  
*If you think there's anything else that should be included in Local Transport Plan 5, please tell us here.*

**Please see the table below for detailed answers to Q18:**

# Buckinghamshire & Milton Keynes Natural Environment Partnership



Q18 – detailed answers			
Section	Suggested changes (additions / deletions)	Reason for change	References
<b>Vision</b>	<p>In 2040 Buckinghamshire will have substantially tackled its transport related carbon emissions and be on target to net zero by 2050.</p> <p>We will have done this by prioritising sustainable growth locations as well as increasing alternative fuel opportunities; offering viable, inclusive and attractive public transport; encouraging healthy and active travel for shorter local trips; and greening our highway network. This includes looking for opportunities throughout the transport network to contribute to our nature recovery goals, such as through wilder road verges and planting new habitats in line with conservation objectives, and looking for ways, such as via gully technology, to reduce harmful chemicals from the highway entering the watercourse.</p>	<p>Need to explain what “greening our highway network” means”.</p> <p>To link transport and environmental objectives, opportunities to contribute to local nature recovery should be sought by the whole transport network - not just the greening of highways.</p> <p>To bring suggested vision in line with conclusions from the TECC Select Committee Review Group’s recent report: Pollution in Buckinghamshire’s Rivers and Chalk Streams Rapid Review – Recommendations from the TECC Select Committee Review Group.</p>	<p><a href="#">Natural England Green Infrastructure Framework (2023) – Principles and Standards for England</a> - particularly the 5 headline standards</p> <p><a href="#">Environmental Improvement Plan (2023) – UK Government</a> – alignment with overall goals including the apex goal for thriving plants and wildlife.</p> <p><a href="#">NEP’s Biodiversity Action Plan – “Forward to 2030”</a> – which covers Bucks and MK</p> <p>The NEP’s <a href="#">Vision and principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes</a></p> <p>Forthcoming Local Nature Recovery Strategy (LNRS) for Buckinghamshire and Milton Keynes</p> <p><a href="https://buckinghamshire.moderngov.co.uk/documents/s53280/Water%20Quality%20Cabinet%20Recommendation%20Response%20Table%20November%202022.pdf">https://buckinghamshire.moderngov.co.uk/documents/s53280/Water%20Quality%20Cabinet%20Recommendation%20Response%20Table%20November%202022.pdf</a></p>

# Buckinghamshire & Milton Keynes Natural Environment Partnership



Q18 – detailed answers Section	Suggested changes (additions / deletions)	Reason for change	References
<p><b>Objective 2 – Decarbonising our transport system</b></p> <p>Suggested actions to achieve this objective, include</p>	<p>g. utilise the highway and wider transport network to support biodiversity and reduce carbon, such as increasing wildflowers on roadside verges or creating and maintaining new habitats in line with local conservation and nature recovery objectives.</p>	<p>It's not just the highway network that can contribute to biodiversity and climate goals – so can the cycleways, footpath verges etc – not just road verges.</p> <p>The statement about increasing wildflowers must be met with investment in new management regimes to allow for this – e.g. reduced cutting frequency over time, but the need for cut-and-collect, for example.</p>	<p><a href="#">Natural England Green Infrastructure Framework (2023) – Principles and Standards for England</a> - particularly the 5 headline standards</p> <p><a href="#">Environmental Improvement Plan (2023) – UK Government</a> – alignment with overall goals including the apex goal for thriving plants and wildlife.</p> <p><a href="#">NEP's Biodiversity Action Plan – “Forward to 2030”</a> – which covers Bucks and MK</p> <p>The NEP's <a href="#">Vision and principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes</a></p> <p>Forthcoming Local Nature Recovery Strategy (LNRS) for Buckinghamshire and Milton Keynes</p>

# Buckinghamshire & Milton Keynes Natural Environment Partnership



Q18 – detailed answers Section	Suggested changes (additions / deletions)	Reason for change	References
<p><b>Objectives 3 Building places for people.</b></p> <p>This objective focuses on aligning our transport ambitions with other aspects of council services, such as town planning and regeneration, public health, and environmental health.</p>	<p>e. deliver high quality public realm improvements which meet the needs of all users of the street space and include contributions to biodiversity, nature and climate goals.</p>	<p>Public realm of all types provides huge opportunity to contribute to the twin nature and climate crises and this should be recognised and supported explicitly in the Local Plan objectives, in line with national and local policy and strategy.</p> <p>For example:</p> <p><i>“Nature-based solutions, or protecting, restoring and better managing ecosystems for the benefit of people and biodiversity, gives the framework to tackle the twin climate and nature crises in an integrated way...”</i> (<a href="#">Natural England Green Infrastructure Framework (2023) – Principles and Standards for England</a> – “What good GI looks like – the attributes”)</p>	<p><a href="#">Natural England Green Infrastructure Framework (2023) – Principles and Standards for England</a> - particularly the 5 headline standards</p> <p><a href="#">Environmental Improvement Plan (2023) – UK Government</a> – alignment with overall goals including the apex goal for thriving plants and wildlife.</p> <p><a href="#">NEP’s Biodiversity Action Plan – “Forward to 2030”</a> – which covers Bucks and MK</p> <p>The NEP’s <a href="#">Vision and principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes</a></p> <p>Forthcoming Local Nature Recovery Strategy (LNRS) for Buckinghamshire and Milton Keynes</p>