

Buckinghamshire and Milton Keynes Natural Environment Partnership: Response to the DRAFT Wycombe District Local Plan

Summary – overall comments

The NEP welcomes mention of the importance of environmental features to the future growth of Wycombe District, for example, set out in the “Sense of Place” Challenge – Para 2.16; and the recognition that the green network nurtures biodiversity, promotes mental and physical wellbeing and that development must take that sense of place as a starting point (Para 3.5). We also welcome the recognition that positive place making is “...indivisible from good planning and sustainable development”, and the need to achieve this requires a “thorough understanding of context at every scale”. (Para 6.77) and the reference to ensuring a net gain in biodiversity across the District as a whole over the period of the Local Plan.

To strengthen the opportunities through the Local Plan to maximise the benefits from Green infrastructure in the Wycombe District, the NEP considers that the draft Local Plan should look to support more strongly and explicitly the NEP’s document, “Vision and Principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes”.

The NEP believes it will be necessary to apply the Green Infrastructure (GI) Principles locally, fully, and at all spatial scales of development in the Wycombe District, to achieve the county-wide Vision for GI in Buckinghamshire and Milton Keynes by 2030. We have highlighted below where the Local Plan’s application of the Principles could be strengthened and made more specific to achieve this aim.

We would also encourage the draft Local Plan to take on board the NEP’s standard response to Local Plans (previously submitted) in respect of biodiversity, green infrastructure, energy and the economy.

Requested amendments - to bring the Local Plan into line with the NEP’s Vision and Principles GI document and its standard response to Local Plans

The NEP requests the following amendments are made in the draft Wycombe District Local Plan to strengthen opportunities to maximise the benefits from Green infrastructure in the Wycombe District:

- 1. State in the Local Plan clear, explicit support for the NEP’s document, the “Vision and Principles for the Improvement of GI in Buckinghamshire and Milton Keynes”.** This represents the body of opinion from experts from a broad range of sectors who the NEP has brought together to define the Vision for GI in Buckinghamshire in 2030, and the Principles by which to achieve it. The document serves as an update to the 2009 GI Strategy for Buckinghamshire. The NEP is looking for all Local Authorities in the area to recognise the

importance of the Vision and Principles document, and to work together to deliver it. The document includes the collective definition of GI recognised by the NEP.

2. **The Plan should ensure it places equal emphasis on early and strategic planning for a green infrastructure network to deliver maximum benefits to Wycombe District, as it does on grey (built) infrastructure** such as road and rail connections. This should be set out in Section 2 (The big challenge) and Section 3, (Vision and Strategic Objectives). The assessment of existing networks is mentioned at Para 6.102, but would also be welcome in explanation of Policy DM33.
3. The Local Plan should include **a map of GI at the District-wide level to show very clearly how the District will contribute overall to the Buckinghamshire-wide Vision and Principles for the Improvement of GI**, including connected networks of GI showing the Vision for what the District aims to protect, provide for or improve and where.

So - in addition to maps for specific areas (in Section 5 of the draft Local Plan) - the District-wide map of GI should show:

- a. **Existing GI features of value.** This should go beyond identifying the AONB, green belt and flood zones - to identify which GI features and areas are important (e.g. canals, major rights of way, BOAs, designated sites and priority habitats, valued landscapes, wildlife corridors, accessible green space, woodlands, etc)
- b. **How Wycombe District will apply and contribute to the overall Vision and Principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes.**
- c. Where there are **deficiencies** in GI; and
- d. **Where new / improved provision is required**, for example in comparison with pressures from growth and development.

This exercise should take into account the need for the protection of existing GI assets in the face of change or growth, provision for future GI assets and planning to relieve pressure on existing assets; the need for connected GI networks; and it should also seek opportunities to maximise the benefits from GI [and apply the other GI Principles].

The map should set out what the District aims to protect, provide for or improve and where, and how this contributes to the Buckinghamshire-wide Vision for GI by 2030.

4. **The need for, and benefits of, green infrastructure should include, but also go further than, retaining a “sense of place”, and a focus on the AONB and Green Belt.** Green infrastructure should be planned for early and strategically, to provide a range of benefits, or “ecosystem services”, at all spatial scales of development. For example, in the place-making Section (Para 6.77), the NEP requests that the Local Plan should explicitly recognise the importance of the protection, improvement and creation of broader GI features as important context, alongside the AONB, as they are also critical to place-making at all scales.

- In placing more emphasis on the need for forward-planning for GI early and strategically, so that the location, type, condition and use of GI provides maximum benefits, the Local Plan should identify the opportunities for GI to meet multiple needs and provide multiple benefits – for the benefit of people and the economy as well as for wildlife. This should include the identification and enhancement of multi-functional green space in and around urban areas.
5. **The plan should make provision for the management and maintenance of GI into the long term** – in line with the NEP’s GI Principle 5. This requires developers to secure management for 25-30 years post completion, and during that time secure a format to manage into perpetuity. Close working with community groups should also be explored to help engage local residents in taking a closer interest in their local green space and in encouraging its use.
 6. **Be more specific about improving the “environmental quality” of town centres to explicitly describe in the Local Plan the green infrastructure assets and enhancements being considered**, and in particular the specific **benefits that are being sought** from them, with a view to **providing GI at prioritised locations where it can deliver most benefits (NEP GI Principle 8)**. (Para 3.12; 4.53). More specific language should look to, for example:
 - **Improving and providing green spaces so they provide multi-functional benefits appropriate to the local area**, including a range of objectives, targets, actions and activities for Buckinghamshire’ environment, health and economy (e.g. leisure, wildlife and air quality objectives; green space for access, health and wellbeing objectives; improve working environment to attract and retain workers); (NEP GI Principles 2 and 3)
 - **Ensuring at the more strategic-scale that access to larger areas of green space meets the ANGSt criteria as a minimum (or equivalent, robust assessment method)**. (*The “Accessible Natural Greenspace Standard”, or “ANGSt” was developed by Natural England and the Forestry Commission. The standard emphasises the importance of communities having easy access to different sizes of natural and semi-natural green space close to where they live*).
 7. **Explicit reference should be made to the NEP’s GI Principle 9, regarding ensuring that GI is linked and relevant to, informed by and coordinated with, other policy areas, strategies, activities and reviews** – which may be occurring within Wycombe District and Buckinghamshire or in immediate neighbouring areas.
 8. **A commitment to work cross-border - in both the planning and delivery-phase - with neighbouring authorities to seek opportunities to maximise benefits from GI through growth and development.** (NEP GI Principle 7)
 9. **Explicit recognition of, and intention to work positively with, the range of both GI and related initiatives already in operation across Buckinghamshire.** (The assessment of

existing networks is mentioned at Para 6.102, but would also be welcome in explanation of Policy DM33). (NEP GI Principles 4 and 9)

10. The reference in policy DM33 to “landscape” networks should be clearer - this should make explicit reference to “green infrastructure networks”. This would be in line with the NEP’s Principles 6 and 7 – concerning the importance of connected networks of GI at all spatial scales, from the landscape to local scale; and ensuring the creation and improvement of GI is coordinated with, and looks for opportunities arising from, activities and existing networks cross-border (at all scales) to maximise the benefits.

11. We would expect Local Plans to require all development to:

- **Contribute towards translating the future vision of GI in Buckinghamshire and Milton Keynes and the Principles for GI advocated by the NEP, to meaningful development and GI projects locally.** Focusing on protecting, improving and providing GI in line with the Principles will turn the vision into reality and create a multi-functional GI network in Bucks and MK that improves economic, environmental and quality of life benefits.
- **Seek opportunities to protect, enhance, extend, create and connect GI for all its benefits (including landscape-scale connectivity of habitats for biodiversity outcomes) from an early stage, including surrounding the site or area.** This requires cooperation with broader policy objectives, and at a practical level, with neighbouring land-owners;
- **Place emphasis on adequate access to high quality green recreation and productive space for community health and wellbeing** (at least conforming to ANGSt standards at the strategic scale), and other services as outlined at Point 6, above).
- **Ensure the size and location of GI is suitable for the function it is intended to fulfil.**
- **Require GI management into the long-term, to ensure that it develops in accordance with its stated intention.** Mechanisms to achieve this must be outlined in development proposals.
- **Require the monitoring of GI improvement, and remedial measures if not achieving satisfactory GI condition within stipulated timeframes.**
- **Allocate and develop sufficient funding mechanisms to improve the quality, location and functions provided by GI, including into the ong-term.** This could include developer contributions, biodiversity offsetting, CIL payments, and long-term provision for example through endowment or similar arrangements.

This approach would require identifying where current GI is, the functions it serves (to understand its potential importance), gaps in provision, and opportunities for how and where it should be improved.

12. **In respect of biodiversity references in the draft Local Plan:**

In line with the NEP's standard Local Plan response in respect of biodiversity, we would also expect the Local Plan to:

- **Identify the biodiversity that will be lost** as a result of the Local Plan and what will be gained; and a check that the gain would outweigh the loss;
- **Include policies on protecting, enhancing and expanding sites of international, national and local ecological importance** – including Local Wildlife Sites and Biological Notification Sites; and protection of protected species and priority species. **Also – of BOAs and meeting the goals of the NEP's BAP for the expansion of priority habitats.**
- **Include requirements for development to respect and protect the aims of a BOA; and also of other valued landscapes and habitats.** This could mean avoidance of development, incorporation of ecologically-sufficient buffers, etc.
- **State clearly that net gain in biodiversity is an expectation on all developments** where possible so the Local Plan as a whole achieves a net gain.
- **Identify a means of assessing whether net gain is proposed, and then is achieved** (i.e. how the net gain will be monitored, for example through using a biodiversity impact calculator to monitor ecological works – which should be included in the monitoring framework of the Local Plan).
- **Make reference to the mitigation hierarchy (avoidance, mitigation, compensation)** – which would strengthen Point 9 of the policy, emphasising that developments should seek to avoid impacts (e.g. by re-design, location at different sites); mitigate for them adequately, or otherwise compensate for them on-site or, as a last resort, off-site.
- **Encourage the incorporation of biodiversity in and around developments for the benefit of people and the economy as well as for wildlife** – for example, green roofs, green walls, street trees, SUDs schemes including biodiversity, wildflower meadows and grass verges, woodland, etc.

13. **All of the NEP's Green Infrastructure "Principles" should be applied to all spatial scales of development to achieve the NEP's county-wide Green Infrastructure Vision.**

14. The NEP's recent [State of the Environment Report](#) also advocates that planning for the future must sufficiently take into account and work towards improving the following, for example through policies in Local Plans:

- The quality and extent of Buckinghamshire's natural assets, including priority habitats and local wildlife sites;
- Water quality / status of Buckinghamshire's rivers – and particularly our chalk streams;

- Reducing average energy demand and encouraging cleaner energy sources such as renewables to combat climate change – e.g. through strategic planning to building design;
- Consumption of resources (e.g. encouraging reduced water use); also waste generated and improving recycling rates;
- Opportunities to improve health and wellbeing of our communities – e.g. access to high quality green space through development, and sufficiently-early, GI planning (as outlined above) in striving to maximise the opportunities to provide multiple benefits where most needed'

Strengthen links between healthy living and the environment; and the economy and the environment – e.g. to encourage physical activity by connecting people to conservation; and encouraging visits to Buckinghamshire.

NB – in making reference to the NEP’s GI “Vision and Principles” document, the Table below summarises the overall Principles currently being approved by the NEP Board.

Table 1 – summary of NEP’s GI Principles (referred to throughout response)

<ol style="list-style-type: none"> 1) Green Infrastructure is as important and necessary as grey (man-made, constructed) infrastructure and social infrastructure for the health and wellbeing of Buckinghamshire’s economy, environment and society. 2) GI, its value and benefits are considered and planned for early and strategically at all spatial scales of development 3) Green Infrastructure across Buckinghamshire should be planned to provide a range of benefits, or “ecosystem services” 4) (Related to 3, above) GI creation and improvement is planned to contribute to the delivery of objectives and targets, good practice actions and activities for Buckinghamshire’s environment, health and economy 5) GI is managed into the long-term 6) Connected networks of green infrastructure are necessary - at both the landscape and local scale - to maximise the benefits 7) GI creation and improvement is coordinated with activities cross-border 8) GI protection, improvement and creation is prioritised in locations where GI can deliver most benefits. Opportunities to maximise the benefits of GI should be explored both strategically, when planning for GI provision ahead of growth and development, and when mitigating the impacts of development. 9) Linked and relevant to, informed by and co-ordinated with, other policy areas, strategies, activities and reviews.

**DETAILED WORKING DOCUMENT - Review of Wycombe District
Local Plan – [draft consultation document](#) July 2016 – against the
NEP’s Standard Local Plan Response AND its near-final “Vision and
Principles for the Improvement of GI in Buckinghamshire”.**

From contents - sections of the Local Plan to review in particular:

Vision and strategic objectives (pg 16)

4

Sustainable Development (pg 20)

Sense of place (pg 47)

Green belt (pg 49)

6

Placemaking (pg 164)

Managing Development in Green Belt and Rural Areas (pg 164)

Appendices – G and H – policies replaced / changes to policies (pg 211 and 215)

Policies and proposals

CP1 – CP9 (pgs 20 – 51);

Delivering the strategy, managing development – policies to make decisions on planning applications (to operate alongside the 2013 Delivery and Site Allocations Plan).

- DM 31 (AONB), 32 (sustainable transport), 33 (GI), 37 (flood risk and sustainable drainage),

- DM40-45 (development in green belt, countryside, AONB, green infrastructure, etc).

TABLE OF NEP's COMMENTS ON DRAFT PLAN

Section	NEP's comments	NEP's supporting references: NEP GI Vision and Principles Document NEP's Standard Local Plan Response
The big challenge		
The Sustainable Development challenge (Para 2.5)	<p>Wycombe should be looking beyond the challenge to “[remain] its strong green infrastructure”. As well as retaining GI, the District should look at new provision, linking and improvement of GI resources for multiple benefits as part of its overall Plan. This is part of the SD challenge (2.5) and not just part of the “sense of place” challenge (Para 2.16)</p> <p>2.13 – The challenge to provide appropriate and enough infrastructure should include green infrastructure – GI is as important as grey (built) infrastructure, and should be planned strategically from an early stage and provision for all communities.</p>	<p>NEP – Principles Doc</p> <p>Principles 1,2 and 3</p> <p>and Standard Local Plan response</p>
3 Vision and strategic objectives		
Cherish the Chilterns (Para 3.5)	<p>While a “sense of place” may well take existing green and blue infrastructure as a starting point, the Local Plan should recognise the need to provide GI not just for local needs, but also as a District contribution to provide for higher-level, strategic needs – as set out in the NEP’s GI Principles for the Improvement of GI in Buckinghamshire and Milton Keynes.</p>	Principle 1
Improving strategic connectivity (Paras 3.6 - 3.8)	<p>The section on improving strategic connectivity should recognise that green infrastructure is an equally important part of this. The section should not just emphasise the importance of connectivity via built infrastructure such as roads and rail links, but also include in here the need to plan for, early and strategically, a connected network of green infrastructure, which is equally important as the need for better connected grey (built) infrastructure, and should be planned for and protected at all spatial scales through the planning system, development requirements and phases of growth.</p>	The NEP’s (draft) Principles for GI in Bucks: Principles 1, 2 and 6
Champion Town Centres (Para 3.12)	<p>Plan should explain what it means by “environmental quality” in town centres that are being seen as “critical to success”.</p> <p>This is also mentioned at Para 4.44 ii, regarding improving attractiveness of existing key business sites;</p> <p>And “enhancements to the town centre environment” is mentioned at Para 4.53.</p> <p>More specific language should look to, for example:</p>	<p>The NEP’s (draft) Principles for GI in Bucks</p> <p>Principles 1, 2, 3, 4, 8</p>

	<p>1) Improving and providing green spaces so they provide multi-functional benefits appropriate to the local area, including a range of objectives, targets, actions and activities for Buckinghamshire’ environment, health and economy (e.g. leisure, wildlife and air quality objectives; green space for access, health and wellbeing objectives; improve working environment to attract and retain workers);</p> <p>2) Ensuring at the more strategic-scale that access to larger areas of green space meets the ANGSt criteria as a minimum. <i>[The “Accessible Natural Greenspace Standard”, or “ANGSt” was developed by Natural England and the Forestry Commission. The standard emphasises the importance of communities having easy access to different sizes of natural and semi-natural green space close to where they live].</i></p> <p>3) The NEP’s Green Infrastructure “Principles” should be applied to all spatial scales of development.</p>	
<p>4 The Strategy: Sustainable Development</p>		
<p>Policy CP1 (pg 20) – “Sustainable development”</p>	<p>Requirements for all new developments to deliver sustainable development:</p> <p>The NEP’s GI Principles should be specifically mentioned in the Plan’s overall strategic objectives and principles (Section 3) that this policy is referring to.</p> <p>Supporting and ensuring the Principles are recognised and adhered to in the Local Plan is essential for achieving sustainable development.</p> <p>Landscape scale and not just Local scale: GI planned for early and strategically; and GI network are necessary - at local and landscape scale - to maximise the benefits.</p>	<p>The NEP’s (draft) Principles for GI in Bucks,</p> <p>Principles 2, 6</p>
<p>Para 4.13 - access</p>	<p>Access should be about GI too – not just travel / transport related.</p>	<p>Principles 2 and 4 – e.g. the need to meet minimum ANGSt criteria.</p>
<p>Placemaking – para 6.77 onwards</p>	<p>Placemaking – we welcome ref to positive place making being indivisible from good planning and sustainable development, and the need to achieve this requires a “thorough understanding of context at every scale”.</p> <p>As well as the AONB, we would encourage the Local Plan to explicitly recognise the importance of the creation and improvement of broader GI as important context, which is also critical to placemaking at all scales.</p>	<p>Principles document – Local Plans would require identifying where current GI is, the functions it serves, gaps in provision and opportunities for how and where it should be improved.</p>
<p>Policy DM33 – delivering green infrastructure in development</p>	<p>Welcome the policy – many good features. Welcome the reference to a net gain in biodiversity.</p> <p>In line with the NEP’s standard Local Plan response and the GI Principles, the Policy should be strengthened to reflect the</p>	

	<p>NEP’s collective expert opinion. In particular, this section should:</p> <ul style="list-style-type: none"> - Place more emphasis on the need for forward-planning for GI early and strategically – so that the location, type, condition and use of GI provides maximum benefits. (So not just about active transport, outdoor sport, woodland, landscape features and biodiversity which is where the current emphasis is). [The assessment of existing networks is mentioned at Para 6.102, but would also be welcome in explanation of Policy DM33).] - Identify the opportunities for GI to meet multiple needs and provide multiple benefits – for the benefit of people and the economy as well as for wildlife. This should include the identification and enhancement of multi-functional green space in and around urban areas. - Identify that making “provision for the management and maintenance of GI...” should be “into the long term” - in line with the NEP’s GI Principles. This requires developers to secure management for 25-30 year post completion, and during that time seek a format to manage into perpetuity. - The Local Plan should include District-level maps to show very clearly how the District will contribute overall to the Buckinghamshire-wide Vision and Principles for the Improvement of GI, including connected networks of GI showing the Vision for what the District aims to protect, provide for or improve and where, and requirements for all development, such as long-term management of GI. <ul style="list-style-type: none"> - Location of designated sites, including Local Wildlife Sites, habitats, priority habitats and BOAs in the District; - Wildlife corridors to connect them. - Valued landscapes and irreplaceable habitats. - GI included in the Plan to identify what is important. <p>In respect of biodiversity, we would also expect the Local Plan to:</p> <ul style="list-style-type: none"> - Identify the biodiversity that will be lost as a result of the Local Plan and what will be gained; and a check that the gain would outweigh the loss; - Include policies on protecting, enhancing and expanding sites of international, national and local ecological importance – including Local Wildlife Sites and Biological Notification Sites; and protection of protected species and priority species. Also – of BOAs and 	<p>Principles 1, 2 and 3.</p> <p>Principle 3, 4 and 8. NEOP standard response (BOAs, pg 7).</p> <p>Principle 5 - which includes some examples.</p> <p>NEP Standard Local Plan response – pg 2-3 i) landscape-scale understanding and planning; and ii) achieving a net gain in biodiversity; also pg 13.</p> <p>NEP Standard Local Plan Response (pg 4, protected sites, habitats and priority species).</p>
--	--	--

	<p>meeting the goals of the NEP’s BAP for the expansion of priority habitats.</p> <ul style="list-style-type: none"> - State clearly that net gain in biodiversity is an expectation on all developments where possible so the Local Plan as a whole achieves a net gain. - Identify a means of assessing whether net gain is proposed, and then is achieved (i.e. how the net gain will be monitored – which should be included in the monitoring framework of the Local Plan). - Include requirements for development to respect and protect the aims of a BOA. - 9. Explicit reference to “landscape” networks – this should make explicit ref to “green infrastructure networks”. This is in line with the NEP’s Principles 6 and 7 – about the importance of connected networks of GI at the landscape to local scale; and ensuring the creation and improvement of GI is coordinated with, and looks for opportunities arising from activities and existing networks cross-border (at all scales) to maximise the benefits. - The order of the mitigation hierarchy (avoidance, mitigation, compensation) would strengthen Point 9 of the policy, emphasising that developments should seek to avoid impacts (e.g. by re-design, location at different sites); mitigate for them adequately, or, as a last resort, compensate for them on-site or, as a last resort, off-site. 	<p>Principles 6 and 7</p> <p>Principle 4</p>
	<p>DM Policies that have been retained and not included in this Local Plan (pg 144)</p> <p>Retained Development Management Policies in the Delivery and Site Allocations DPD:</p> <p>DM1 Presumption in Favour of Sustainable Development DM2 Transport Requirements of Development Sites DM3 Transport Improvement Lines DM4 Former Bourne End to High Wycombe Railway Line DM5 Scattered Business Sites DM6 Mixed-Use Development DM7 Town Centre Boundaries DM8 The Primary Shopping Areas DM9 District Centres DM10 Thresholds for the Assessment of Schemes for Town Centre Impact</p> <p>DM11 Green Networks and Infrastructure DM12 Green Spaces DM13 Conservation and Enhancement of Sites, Habitats and Species of Biodiversity and Geodiversity Importance DM14 Biodiversity In Development</p>	

	DM15 Protection and Enhancement of River and Stream Corridors DM16 Open Space in New Development DM19 Infrastructure and Delivery	
--	---	--