

## Appendix 1:

# Response of The Buckinghamshire and Milton Keynes Natural Environment Partnership

The Buckinghamshire and Milton Keynes Natural Environment Partnership (NEP) is grateful for the opportunity to comment on the proposed plan. We would like to offer some standard advice and information from the main strategies, policies and principles that need to be taken into account during assessment. 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.

**The Tables in this Section act as check-lists for compliance. They list the questions that need to be addressed and answered in order to assess whether the objectives of the NEP, as well as the requirements of the NPPF, are delivered through your Local Plan.**

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# 1) LANDSCAPE-SCALE BIODIVERSITY , PROTECTED SITES AND ECOLOGICAL NETWORKS

## Key documents

The main NEP-related document on biodiversity is:

[Buckinghamshire and Milton Keynes Biodiversity Action Plan “Forward to 2020”](#)

Further details on biodiversity and planning across Buckinghamshire and Milton Keynes is provided in [Biodiversity and Planning in Buckinghamshire](#) (revised 2014). This was produced jointly by Buckinghamshire County Council, Milton Keynes Council, the Buckinghamshire and Milton Keynes Environmental Records Centre (BMERC), the Berks Bucks and Oxon Wildlife Trust (BBOWT) and Natural England.

These documents should be referenced in the Local Plan, aligned with, and included in any Bibliography of relevant documents.

Policy area and questions to check compliance	NPPF reference (where applicable)	(NPPG reference / other refs)
<p><i>i) <u>Landscape-scale understanding and planning</u></i></p> <p>Our society and economy needs the land resource of Buckinghamshire to provide a diverse range of utility, including food production, space for recreation as well as our entire, commercial and public infrastructure.</p>		
<ul style="list-style-type: none"> <li>• Has the Plan collated sufficient ecological information in order to have adequately characterised the area under consideration and on which to base any further decisions?</li> <li>• Does the Local Plan include a map(s) showing the location of the following types of designated sites and habitat?               <ul style="list-style-type: none"> <li>SACs</li> <li>SSSIs</li> <li>Local Wildlife Sites</li> <li>Biological Notification Sites</li> <li>Ancient woodlands</li> <li>Priority habitats</li> </ul> </li> <li>• Does the Plan recognise the need to integrate biodiversity into land management beyond protected sites and sites managed for wildlife? For example, does the Plan identify and map</li> </ul>	<p>117, 118, 157, 158, 165, 166, 181, 192</p>	<p><a href="#">Biodiversity, ecosystems and green infrastructure</a> (Para 009; 21, 22)</p> <p><a href="#">The NEP's BAP</a></p> <p><a href="#">Biodiversity and Planning in</a></p>



Policy area and questions to check compliance	NPPF reference (where applicable)	(NPPG reference / other refs)
<p><i>“if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused...”</i></p> <ul style="list-style-type: none"> <li>- allow for possible compensation for residual adverse impacts on other land?</li> </ul>		
<p><i>iii) <u>Protected sites, priority habitats and protected and priority species</u></i></p> <p>Districts in Buckinghamshire contain numerous areas of high ecological value, including those of international (SAC), national (SSSIs) and local (Local Wildlife Sites and Biological Notification Sites) importance. In addition there are numerous sites with habitats of principal importance under the NERC Act 2006 (also known as priority habitats), which are high quality habitats for biodiversity.</p>		
<ul style="list-style-type: none"> <li>• Has the plan identified and presented policies on how it will protect, enhance and expand sites of international, national and local ecological importance?</li> <li>• Is there detailed, robust Policy text included to ensure appropriate protection for high quality habitats for biodiversity? (i.e. protected sites, irreplaceable habitats, priority habitats, protected species and priority species?) i.e.: <ul style="list-style-type: none"> <li>SACs</li> <li>SSSIs</li> <li>Local Wildlife Sites</li> <li>Biological Notification Sites</li> <li>Irreplaceable habitat</li> <li>Priority habitat (or habitat of principal importance under the NERC Act 2006) . including Ancient Woodland?</li> <li>Protected species</li> <li>Priority species (or species of principal importance under the NERC Act 2006)</li> </ul> </li> <li>• Is the Plan adequate in its protection of Local Wildlife Sites and Biological Notification Sites, which support locally and nationally threatened wildlife, and priority habitats and species?</li> </ul>	<p>109, 113, 115, 117, 157, 166</p> <p>7, 118</p> <p>109,113,115,117, 157</p>	<p><a href="#">Local Sites - Para 012</a></p> <p><a href="#">Biodiversity and Planning in Buckinghamshire</a></p> <p><a href="#">Priority Habitats</a></p> <p><a href="#">The NEP's BAP</a></p>
<ul style="list-style-type: none"> <li>• Is the plan adequate in its protection of legally protected species?</li> </ul>	<p>109, 115, 117</p>	<p><a href="#">Protected Species</a></p>
<ul style="list-style-type: none"> <li>• Does the plan have adequate provision for priority species that are not legally protected (Biodiversity Action Plan species)?</li> </ul>	<p>109, 115, 117</p>	<p><a href="#">Priority Species</a></p>

Policy area and questions to check compliance	NPPF reference (where applicable)	(NPPG reference / other refs)
<p>iv) <u>Long-term management and monitoring of ecological features</u></p> <p>To ensure the measures for compensation and enhancement are maintained on a long-term basis and are of a suitable quality, planning policy should require an ecological management plan for relevant applications, and suitable monitoring regime.</p>		
<ul style="list-style-type: none"> <li>Does the Plan require an ecological management plan for all relevant applications? Policy wording could include:  <i>“A monitoring and management plan will be required for biodiversity features on-site to ensure their long term sustainability”.</i></li> <li>Does the Plan include a biodiversity monitoring programme? Policy wording could include:  <i>“To minimise impacts on biodiversity and geodiversity, planning policies should...identify suitable indicators for monitoring biodiversity in the plan”</i></li> </ul>	117	
<p>v) <u>Ecological networks</u></p> <p>Based on a review of biodiversity in Buckinghamshire, the <a href="#">Buckinghamshire and Milton Keynes Biodiversity Action Plan “Forward to 2020”</a> (the NEP’s BAP+) identifies key principles and goals that planning decisions must take into account. The BAP’s aim is to retain, protect, and, where possible, enhance biodiversity now and in the future . as our health and prosperity depend on looking after the environment. The NEP’s BAP goal to restore and connect habitats across Buckinghamshire aligns with local aspirations and national targets . including the <i>Defra 2011 strategy Biodiversity 2020: A Strategy for England’s wildlife and ecosystem services</i>.</p> <p>For a sustainable economy, the Buckinghamshire land resource needs to be more ecologically robust on a landscape scale, and one that can provide the fullest spectrum of ecosystem services. These provide the needs of life, and underpin economic and social necessities . such as clean water, productive soil, pollination, flood defence, control of disease, clean air, etc.</p> <p>For biodiversity in Buckinghamshire to be supported sustainably, its needs must be meaningfully integrated into land management beyond protected sites and sites managed for wildlife. It is no longer sufficient to rely upon small, fragmented and disconnected wildlife-rich sites such as protected sites and nature reserves.</p>		



vi) Biodiversity Opportunity Areas

Biodiversity Opportunity Areas are key landscape-scale areas in Buckinghamshire and Milton Keynes for the restoration and creation of priority habitat. They are the most important areas for biodiversity in the County and represent a targeted landscape-scale approach to conserving biodiversity, and the basis for an ecological network.

Biodiversity Opportunity Areas are critical to the functioning of biodiversity in Buckinghamshire - and also to the many ecosystem services that are essential for human survival and well-being and which are derived from nature.

<ul style="list-style-type: none"> <li>• Does the Plan include provision for enhancing the area's ecological network? <ul style="list-style-type: none"> <li>- By identifying and targeting action on Biodiversity Opportunity Areas (BOAs).</li> <li>- By preparing Green Infrastructure strategies including the identification and enhancement of multi-functional green space in and around urban areas. (see GI section, below, for further details)</li> </ul> </li> <li>• Does the Plan include a map of Biodiversity Opportunity Areas in the Local Authority Area / District?</li> </ul>	<p>21, 109, 113, 117, 165</p>	<p><i>Habitats of principal importance under the <a href="#">NERC Act 2006</a> The NEP's BAP Biodiversity and Planning in Buckinghamshire</i></p>
<p>Given the importance of BOAs to biodiversity functioning in the County, and their high profile in the NPPF,</p> <ul style="list-style-type: none"> <li>• Is there a specific Policy on BOAs?</li> <li>• Does this include requirements that: <ul style="list-style-type: none"> <li>- Where development is proposed within or adjacent to a BOA, is a biodiversity survey and a report required to identify both constraints and opportunities for biodiversity enhancement?</li> <li>- Development that would prevent the aims of a BOA being achieved will not be permitted?</li> <li>- Where there is potential for development in a BOA, the design and layout of the development, planning conditions or obligations would be used to secure biodiversity Enhancement to help achieve the aims of the BOA?</li> </ul> </li> </ul>	<p>21, 109, 113, 117, 165</p>	<p><a href="#">The NEP's BAP Biodiversity and Planning in Buckinghamshire</a></p>

vii) Biodiversity in the built environment

About 20% of Buckinghamshire is classified as urban. Urban environments have a disproportionately important role in providing benefits for physical health and mental wellbeing. Open Mosaic Habitats, identified in the UK BAP as a Priority Habitat in 2007, can have a high biodiversity value, and are found mainly in urban and formerly industrial areas. Public land (road verges, school grounds, parks, cemeteries, etc.) and corporate estates all have the potential to provide for wildlife if managed sensitively.

Wildlife in urban areas can also have significant benefits to humans. For example, wildlife habitat can reduce:

- The urban-heat island effect (which is exacerbated by artificial surfaces as opposed to green space);
- Air pollution (by removing gaseous pollutants and particulates from vehicle exhausts);
- Flood risk - by slowing run-off.

Wildlife also provides opportunities of the enjoyment of nature and open spaces, with physical health and mental wellbeing effects.

The NEP encourages actions that will maximise biodiversity and ecosystems services benefits.

<ul style="list-style-type: none"> <li>• Does the Plan include policy on the incorporation of biodiversity in and around developments?</li> <li>• Are details provided (in the Plan or a separate design guide) on how this can be achieved?</li> <li>• Does the Plan encourage actions to maximise biodiversity and ecosystems services benefits? (i.e. does the text emphasise that biodiversity in built developments is about creating a better environment for the benefit of people and the economy as well as wildlife?)</li> </ul>	<p>109, 118, 125</p>	<p><a href="#">Local Sites</a></p> <p><a href="#">The NEP's BAP</a></p> <p><a href="#">Biodiversity and Planning in Buckinghamshire</a></p> <p><a href="#">Ecosystem services Para 013</a></p>
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*viii) Strategic Development Sites*

Strategic development sites may come forward in future stages of the Local Plan process. Prior to adoption, a full initial assessment of the ecological value of the sites should be undertaken. This would inform the allocation of the sites in the Local Plan, and help determine whether allocation of the site is appropriate in terms of biodiversity impacts.

- Is a full assessment undertaken of the ecological value of any strategic development site coming forward in future stages of the Local Plan, *prior to adoption of any site*?
- Does this assessment inform the allocation of sites in the Local plan and whether the site is appropriate in its biodiversity impacts?

*ix) Protection and enhancement of river and stream corridors*

- Does the Policy include content to ensure that, for proposals adjacent or close to watercourses:
  - Planning permission would only be granted for development proposals which would not have an adverse impact on the functions and setting of any watercourse and its associated corridor. (For example, watercourse bank ~~to~~ buffer+habitats should be retained and managed into the long-term to create a natural flood defence).
  - Planning permission would only be granted for proposals which do not involve the culverting of watercourses and which do not prejudice future opportunities for de-culverting.
- Does the Policy conserve and enhance the biodiversity, landscape and recreational value of the watercourse and its corridor through good design?

x) <u>Environmentally-sustainable development</u>		
<ul style="list-style-type: none"> <li>• Does the Local Plan include the following Policies?               <ul style="list-style-type: none"> <li>- Mitigating and Adapting to Climate Change?</li> <li>- Sustainable Construction</li> <li>- Renewable energy (see Section below)</li> <li>- Sustainable Flood Risk Management</li> <li>- Sustainable Drainage Systems (SUDS)</li> </ul> </li> </ul>	17, 93, 94, 95, 96, 97, 99, 100	<a href="#">The NEP's BAP</a>
<ul style="list-style-type: none"> <li>• Does the Local Plan include the following content of the suggested policies?</li> </ul> <p><u>Mitigating and adapting to climate change Policy.</u></p> <ul style="list-style-type: none"> <li>- Distributing growth to the most sustainable locations as defined in the Plan?</li> <li>- Development to reduce the need to travel and encourage sustainable travel options</li> <li>- Designing developments to reduce carbon emissions and use resources more effectively, including water.</li> <li>- Encouraging the creation of priority wildlife habitats (Habitats of Principle Importance under the NERC Act 2006) . such as wetland, species-rich permanent grassland and deciduous woodland . which can play an important role as a carbon stores and in adapting to the impacts of climate change.</li> <li>- Encouraging the restoration and creation of habitat in ecological networks . to reduce habitat fragmentation and allow species to move and adapt as their climate space changes.</li> </ul>	17, 93, 94, 95, 96, 97, 99, 100	<a href="#">The NEP's BAP</a>

<ul style="list-style-type: none"> <li>- Encouraging measures to adapt to climate change . e.g. planting, use of green / brown roofs and green walls, sustainable drainage systems and flood risk management.</li> <li>- Reducing the effects of development on the microclimate (through the provision of green infrastructure including open space and water, planting and green roofs) . see below for Green Infrastructure section.</li> <li>- Promote the use of decentralised and renewable or low carbon energy where appropriate . see below for Energy and Resources Management section.</li> <li>- Consider in detail adaptation through design approaches.</li> </ul>		
<p><u>Sustainable construction</u></p> <ul style="list-style-type: none"> <li>- All residential development to incorporate sustainable design and construction technology, aiming towards zero carbon development through energy efficiency, carbon compliance and allowable solutions in line with Government policy.</li> </ul>		
<p><u>Renewable Energy:</u> See Energy section, below, pg 13.</p>		
<p><u>Sustainable Flood Risk Management</u></p> <ul style="list-style-type: none"> <li>- Policy to safeguard floodplains (and floodplain habitats).</li> <li>- Seek opportunities to create wetlands, wet grass- and woodlands and restore natural river flows and floodplains, increasing amenity and biodiversity value.</li> <li>- Avoid building over or culverting of watercourses; encourage removal of existing culverts.</li> </ul>	94, 99, 100, 103.	
<p><u>Sustainable Drainage Systems (SuDS)</u></p> <ul style="list-style-type: none"> <li>- Requirements for all development to use sustainable drainage systems (SuDS) for the management of surface-water runoff.</li> <li>- Requirement to ensure SuDs are designed to maximise the opportunity to benefit biodiversity (e.g. green and brown roofs; plant wildflower rich grassland at detention basins and for reinforced permeable surface for car parks and drives).</li> </ul>		

## 2 GREEN INFRASTRUCTURE

Local Plans should include policies on Green infrastructure and recognise that it is an important resource that needs to be planned for, protected and managed into the long term. Green Infrastructure provides benefits for the environment, the economy and society. Access to green space is vital to the health and wellbeing of our communities. The protection and enhancement of biodiversity assets on a landscape scale is dependent on robust networks of Green Infrastructure which facilitate movement and genetic exchange.

### Key documents

A guide to strategic Green Infrastructure Priorities in Buckinghamshire (i.e. beyond, and not to be confused with other “green space” requirements that may be required at a local level to meet planning requirements of new housing developments) are set out in the following documents:

[Milton Keynes Green Infrastructure Plan, 2008](#)

[Buckinghamshire Green Infrastructure Strategy 2009](#)

[Buckinghamshire Green Infrastructure Strategy 2009 \(Appendices\)](#)

[Buckinghamshire Green Infrastructure Delivery Plan 2013](#)

Some individual Buckinghamshire Districts also have their own GI strategies and / or delivery plans.

These documents should be referenced in the Local Plan, aligned with, and included in any Bibliography of relevant documents.

Questions	NPPF reference	NPPG reference / other
<p><b>i) Green Infrastructure opportunities</b></p> <p>Green Infrastructure (GI) consists of links, hubs and features that have environmental, social and economic qualities associated with them. GI and the associated qualities are delivered through protecting, enhancing and installing GI.</p> <p>The NEP endorses the definition of Green Infrastructure identified in the Green Infrastructure Strategy (2009), as was agreed by the Buckinghamshire Green Infrastructure Consortium, as follows:</p> <p><i>“Green Infrastructure provides a vital life-support system, encompassing a network of green spaces, access routes, landscapes and natural and historic elements that intersperse and connect Buckinghamshire’s urban and rural settlements with each other and the surrounding countryside. Operating at all spatial scales, it enables a holistic overview of the natural and historic environment, acknowledging its multi-functional benefits for economy, wildlife and health and wellbeing of local people and communities”.</i></p>		

Questions	NPPF reference	NPPG reference / other
<p>The Buckinghamshire Green Infrastructure Delivery Plan also noted the NPPF (March 2012) definition (in the annex at page 52):  <i>“...a network of multi-functional functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities”.</i></p> <p>The Buckinghamshire GI Strategy identified three %Priority Action Areas+based on GI deficits compared with likely increased demand for access as a result of growth, as assessed for the 2009 Buckinghamshire GI Strategy. The Areas were identified to focus investment in protecting existing resources and in delivering new and enhanced GI opportunities, and may be updated to reflect emerging growth figures of the latest HEDNA.</p> <p>The assessment of strategic-level Green Infrastructure provision, opportunity and deficiency in the Buckinghamshire GI Strategy was based on the %Accessible Natural Greenspace Standard+(ANGSt) developed by Natural England and the Forestry Commission. This is a nationally-recognised approach and is consistent with that used in neighbouring counties, although concentrates on the benefits of GI for human need. 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.</p> <p>At a strategic level, applying ANGSt to the County’s database of GI opportunities established that, whilst areas such as the Chilterns, South Bucks and the Thames Valley are well provided-for in terms of strategic level accessible Green Infrastructure, much of Aylesbury Vale is deficient of provision (based on the assessments of growth applied for the 2009 strategy . which have since changed, and in some areas drastically).</p> <p>The GI Strategy identified two Priority Action Areas around Aylesbury to provide for future growth communities; and one in Wycombe District South and South Bucks . as a result of the range of GI assets being fragmented and under pressure from surrounding catchment populations.</p>		
<p><u>Strategic planning of GI</u></p> <ul style="list-style-type: none"> <li>• Does the Local Plan define %Green Infrastructure+in a way that aligns with the Buckinghamshire Green Infrastructure Strategy and Delivery Plan definitions, and national GI policies?</li> <li>• Does the Policy include the need to plan GI effectively at an early stage? New development in Buckinghamshire should deliver better opportunities for accessible strategic Green Infrastructure in the local proximity. This should be through the enhancement or protection of existing assets in the face of change or growth, and for future GI provision to complement and relive pressure on existing GI assets.</li> <li>• Does the Plan recognise, and seek to positively work with, the range of GI initiatives already in operation across Buckinghamshire (for example, adding links to existing public rights of way).</li> <li>• Is there a map of GI included in the Plan to identify what is important?</li> </ul>		<p><a href="#">Green infrastructure</a> (Para 019; ) <a href="#">Buckinghamshire Green Infrastructure Strategy 2009</a>  <a href="#">Buckinghamshire Green Infrastructure Delivery Plan 2013</a></p>

Questions	NPPF reference	NPPG reference / other
<p><u>Importance of GI consideration in development and linking beyond site boundaries</u></p> <ul style="list-style-type: none"> <li>• Is there a Policy on Green Infrastructure in the Local Plan that recognises the need for development to address and contribute to GI?</li> <li>• Does the Policy explore opportunities posed by new development to create, protect and enhance GI on, and surrounding, development sites?</li> <li>• Does the Policy give due consideration to linking and enhancing GI opportunities falling beyond development site boundaries?</li> </ul>	114	<p><a href="#">Buckinghamshire Green Infrastructure Strategy 2009</a></p> <p><a href="#">Buckinghamshire Green Infrastructure Delivery Plan 2013</a></p>
<p><u>Alignment of provision of GI Strategy with County and District GI Strategies</u></p> <ul style="list-style-type: none"> <li>• Does the Plan provide for GI consistent with the principles and proposals of the Buckinghamshire GI Strategy (2009) and Delivery Plan (2013)?</li> <li>• Does the Policy, for the three Priority Action Areas where deficiencies of GI have been identified (or for approved, updated Priority Action Areas): <ul style="list-style-type: none"> <li>- Address deficiencies in green space via the provision of new or enhancement of existing, strategic accessible greenspace.</li> <li>- Give priority to the conservation and enhancement of landscape character, biodiversity and historic environment.</li> </ul> </li> </ul>		<p><a href="#">Buckinghamshire Green Infrastructure Strategy 2009</a></p> <p><a href="#">Buckinghamshire Green Infrastructure Delivery Plan 2013</a></p>
<p><u>Opportunities for GI for multiple benefits</u></p> <ul style="list-style-type: none"> <li>• Does the Policy explore opportunities for GI to contribute to, where possible: <ul style="list-style-type: none"> <li>- Countryside access gateways+(key locations to act as Gateways to the wider GI network);</li> <li>- Access links+. existing or proposed new links to provide strategic movement corridors between main settlements and countryside access gateways; and</li> <li>- GI Opportunity Zones+. where there are strategic opportunities, needs or demands to protect and enhance existing assets and create new GI opportunities</li> </ul> </li> </ul>		<p><a href="#">Buckinghamshire Green Infrastructure Strategy 2009</a></p> <p><a href="#">Buckinghamshire Green Infrastructure Delivery Plan 2013</a></p>

Questions	NPPF reference	NPPG reference / other
<ul style="list-style-type: none"> <li>Does the Local Plan identify where target GI investment is most likely to deliver benefits? Does this take account of the Priority Action Areas identified in the Buckinghamshire Green Infrastructure Strategy (or for approved, updated Priority Action Areas) and specific project proposals identified in the Buckinghamshire GI Delivery Plan?</li> </ul>		
<p><u>Target aims for the provision of green infrastructure</u></p> <ul style="list-style-type: none"> <li>Does the policy set out the target aims for the provision of GI? E.g. part of the target aim should be for all new communities to have adequate accessible green space to meet the minimum ANGSt standards. Other possible targets could include benefits of GI for: <ul style="list-style-type: none"> <li>air quality / microclimate</li> <li>climate change mitigation and adaptation;</li> <li>community and culture benefits;</li> <li>drainage and flood relief;</li> <li>water quality and supply;</li> <li>economic opportunities and benefits;</li> <li>education;</li> <li>habitats (type, connectivity) and biodiversity;</li> <li>health and wellbeing;</li> <li>recreation and leisure;</li> <li>travel and transport.</li> </ul> </li> </ul>		<a href="#">Buckinghamshire Green Infrastructure Strategy 2009</a>
<p><u>GI as a means to provide access to green space</u></p> <ul style="list-style-type: none"> <li>Does the Local Plan provide for adequate access to green space, essential for community health and wellbeing? Does the Plan set out how this is robustly assessed?</li> <li>Does the Local Plan identify where Green Infrastructure provision is deficient and needs to be addressed, based on the needs for access to natural green space of growth communities?</li> </ul>		<a href="#">Buckinghamshire Green Infrastructure Strategy 2009</a>

Questions	NPPF reference	NPPG reference / other
<p><u>Green Infrastructure for conservation, biodiversity and habitat (including connectivity) purposes</u></p> <ul style="list-style-type: none"> <li>• Does the Policy ensure that Green Infrastructure contributes positively to the conservation, restoration, re-creation and enhancement of networks of biodiversity on a landscape scale?</li> <li>• Does this include, in GI provision, ecological corridors to ensure habitat connectivity, including considering the surrounding context of a site or area?</li> <li>• Does the Policy ensure that the size and location of GI is suitable for the function it is intended to fulfil? (For example, for habitats and biodiversity, where required, GI should ensure permeability for wildlife through development and provide sufficient beneficial habitat to support target species, independent of its connective function).</li> </ul>		<p><a href="#">Buckinghamshire Green Infrastructure Strategy 2009</a></p>
<p><u>Delivery of GI and ongoing monitoring</u></p> <ul style="list-style-type: none"> <li>• Does the Policy include an informed approach to delivery of GI in new development processes? For example, by requiring developers to: <ul style="list-style-type: none"> <li>i. Assess GI on and around a site, both quantitatively and qualitatively and looking at their functional importance.</li> <li>ii. Ensure that development proposals protect important existing GI and its functionality (including giving it appropriate buffers and buffer edge treatment)</li> <li>iii. Design in new GI which complements existing GI.</li> <li>iv. Where possible, design new green infrastructure to take multifunctional GI approach (e.g. SuDS providing wildlife and landscaping or roofs being green for SuDS, insulation and wildlife benefits)</li> <li>v. Secure the provision of long term maintenance of GI - linked to planning approval.</li> </ul> </li> <li>• Does the Policy include provision to monitor the aims of GI to ensure it develops in accordance with its stated intentions? For example, if not achieving satisfactory habitat creation, are mechanisms to achieve this must be outlined in development proposals?</li> </ul>		

### 3) ENERGY RESOURCE MANAGEMENT

#### Key documents

In 2015, the Buckinghamshire and Milton Keynes Natural Environment Partnership published an Energy Strategy for Buckinghamshire and an associated first 5-year Action Plan (“Action Plan One”) aiming to deliver social, economic and environmental benefits.

[Buckinghamshire Energy Strategy \(2015\)](#)

[Buckinghamshire Energy Strategy - Action Plan One \(2015\)](#)

Milton Keynes has a long-term strategy set out in its Roadmap to 2050 available [here](#).

These documents should be referenced in the Local Plan, aligned with, and included in any Bibliography of relevant documents.

Questions	NPPF reference	NPPG reference / other
<p><b>Policies required in the Local Plan</b> To comply with the NPPF, the NEP recommends content in the Local Plan as follows, either as new policies or within the existing policy structure.</p>		
<ul style="list-style-type: none"> <li>• In line <b>with</b> the NEP Energy Strategy and Action Plan One (2015), does the Local Plan recognise the need to:               <ul style="list-style-type: none"> <li>- <b>Increase the amount of energy generated in Buckinghamshire</b>, including through community projects; and encouraging or requiring the inclusion of solar panels in both residential and commercial developments.</li> <li>- <b>Improve energy efficiency</b> across the county, particularly by addressing buildings in four sectors: residential, public sector, business and community-owned buildings</li> <li>- <b>Increase generation which benefits local communities</b> - creating a thriving network of community groups with the capacity, scale and influence to deliver significant benefits from energy generation schemes.</li> <li>- <b>Increase the demand for energy-related goods and services</b>, with local businesses able to meet the demand.</li> </ul> </li> </ul>	<p>93, 94, 95, 96, 97</p>	<p><a href="#">Buckinghamshire Energy Strategy (2015)</a></p> <p><a href="#">Buckinghamshire Energy Strategy - Action Plan One (2015)</a></p>

Questions	NPPF reference	NPPG reference / other
<b><i>i) <u>Renewable energy</u></i></b>		
<ul style="list-style-type: none"> <li>• <b>Does the Policy promote renewable energy</b>, where appropriate, in new and existing developments?</li> </ul>	93, 97	
<ul style="list-style-type: none"> <li>• <b>Does the Policy support renewable and low carbon energy provision wherever any adverse impacts can be addressed satisfactorily?</b> (The potential local environmental, economic and community benefits of renewable energy schemes will be a material consideration in determining planning applications).</li> </ul>	93, 98	
<ul style="list-style-type: none"> <li>• <b>Does the Plan encourage applications involving renewable energy development</b>, provided that there is no unacceptable adverse impact, including cumulative impact, on the following issues, which are considered to be of particular local significance: <ul style="list-style-type: none"> <li>- Landscape and biodiversity including designations, protected habitats and species, and Biodiversity Opportunity Areas;</li> <li>- Visual impacts on local landscapes;</li> <li>- Openness of the Green Belt;</li> <li>- The historic environment, including designated and non-designated assets and their settings;</li> <li>- Aviation activities;</li> <li>- Highways and access issues, and;</li> <li>- Residential amenity.</li> </ul> </li> </ul>		

#### 4) THE ENVIRONMENT AND THE BUCKINGHAMSHIRE ECONOMY

The NEP recognises the importance of the environment and the benefits and services it provides to the Buckinghamshire economy. Our society and economy need the land resource of Buckinghamshire to provide a diverse range of utility, including food production space for recreation and private, commercial and public infrastructure.

A sustainable Buckinghamshire economy will require our land resource to be more ecologically robust on a landscape-scale and be one which can provide the fullest spectrum of ecosystem services, which provide the needs of life and economic necessities such as pollination, flood defence, control of diseases and productive soil.

##### **Key documents**

The Local Enterprise Partnerships across Buckinghamshire and Milton Keynes have produced the following key documents regarding the relationship between the Buckinghamshire environment and economic growth:

- The [Buckinghamshire Thames Valley LEP's Strategic Economic Plan](#) recognises that "an outstanding natural environment" is one of the strengths of the Buckinghamshire economy, and that there are a number of environmental risks linked to business growth and infrastructure issues.
- The South East Midlands Local Enterprise Partnership ("SEMLEP") publication, [It's the economy, naturally](#) identifies the relationship between the environment and the economy in the South East Midlands. SEMLEP's Strategic Economic Plan (available [here](#)) aims to deliver jobs and homes growth through planned targeted interventions that have been rigorously appraised and prioritised using Treasury Green Book criteria.

These documents should be referenced in the Local Plan and included in any Bibliography of relevant documents.