

## Response from the Buckinghamshire and Milton Keynes Natural Environment Partnership (The "NEP") to the Draft Vale of Aylesbury Local Plan

Link here: [VALP](#)

### Overall

#### *Summary*

The NEP welcomes the recognition in the draft Vale of Aylesbury Local Plan ("VALP") of the potential for GI to deliver multi-functional, accessible and connected open spaces, important for biodiversity, the historic environment, wildlife and landscape. We also welcome recognition of the GI link to engaging the community to build a strong sense of place, and to provide health and recreational benefits at little or no cost to users. (Para 9.7, pg 163; and Policy I1). We agree with the need for water quality to "...be maintained and enhanced by avoiding adverse effects of development on the water environment" - the need for improved water quality was shown in our recent "State of the Environment" report for Buckinghamshire. We see that much of our standard response to Local Plans, submitted at the Issues and Options stage, has been taken into account in the Renewables section in particular.

To strengthen the opportunities through the Local Plan to maximise the benefits from Green Infrastructure in the Vale of Aylesbury, the NEP considers that the draft Local Plan should look to support more strongly and explicitly the NEP's document, the "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.

**NB - The NEP's GI Vision and Principles document has case studies and workable examples to illustrate how the Principles can be / have been applied in practice.**

Our specific requested amendments to the draft Local Plan are detailed in the section below. However, in summary, to maximise benefits from GI, the NEP advocates that the draft Plan would be strengthened by more emphasis on:

- **Strategic goals for GI across county – VALP to look to provide strategic-scale benefits, in addition to local / District ones** - setting out clearly how the Plan will specifically implement the NEP’s county-wide strategy for GI. *(NEP GI Principles 1, 8 and 9)*
  
- **Working cross-border – essential requirement to maximise the benefits of GI (Development proposals should look not just “within the site” but beyond it** – in line with the NEP’s GI Principle 7 regarding the coordinating GI creation and improvement with activities and existing networks cross-border.) *(NEP GI Principles 6 and 7)*
  
- **In particular, the need for early and strategic planning for GI needs – including specific mapping work** to identify key GI features of importance in the District, how best to link them given areas of growth; identifying areas of GI deficiency and making sufficient provision through new / improved GI to meet access standards and maximise wider benefits. *(NEP GI Principles 2, 3 and 4; and Expectations for Local Plans - page 18, NEP Vision and Principles document)*
  
- While we welcome the intention that **net gain in biodiversity** will be “sought” in considering development proposals (NE2, Biodiversity), we would expect this statement to be **strengthened, to bring it in line with the NEP’s Principles, and practice elsewhere**, such as in Milton Keynes, where the current Local Plan policy NE3 – Biodiversity and Geological Enhancement states:
 

*“All new development exceeding 5 dwellings (in the case of residential development) or incorporating gross floorspace in excess of 1000 sq m (in the case of other development) will be required to incorporate proposals to enhance biodiversity and geological features which are appropriate to, and where possible compensate for, impacts on the immediate area and the site characteristics. Measures may include use of native species in landscaping schemes, or the improvement or creation of wildlife habitats or features of geological interest. Priority will be given to woodland planting and other habitats and species identified by local Biodiversity Action Plan. Where enhancement is not possible on the site, appropriate enhancements will be sought on other land.”*

**Net gain should be "required" (or, at the least, "expected") for all development where possible;** and **include commitment to a mechanism / metric** (which is to be developed) for assessing likely and actual net gains delivered. *(NEP GI Principles 4 and 6; also see NEP Standard Response; and NEP note to BPOG)*
  
- **Commitment to long-term management of GI** in line with the definitions in the NEP’s GI Vision and Principles document. *(NEP GI Principle 5)*

- While we welcome reference to features to encourage **biodiversity in the built environment** and retaining habitat connectivity, **more detail needed on how this should be done, and for development proposals to be “required” to incorporate such designs** in development, rather than “expected” to. *(NEP GI Principle 8; also Appendix 2 of the NEP’s GI Vision and Principles document).*
- **In respect of water courses, the need to seek opportunities to protect and enhance biodiversity, and increase amenity value,** of water courses, in development proposals; and specific mention of an ecological “buffer” to counter negative impacts of development on water courses. Impacts may be to water quality, ecology, amenity, etc.  
*(NEP Principle 7; also see NEP Standard Response)*

## 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*

**NB – in making reference to the NEP's GI "Principles" document, the Table below (Table 1) summarises the overall Principles currently being approved by the NEP Board.**

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

- 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.**

**The NEP's "Standard Response" to Local Plans** is also referred to in this document, and can be found [here](#) on the NEP's website.

**The NEP requests the following amendments are made** in the draft Vale of Aylesbury Local Plan to strengthen opportunities to maximise the benefits from Green infrastructure in the 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 and includes the collective NEP-recognised definition of GI. The NEP is looking for all Local Authorities in the area to recognise the importance of the Vision and Principles document, not least in Local Plans, and to work together to deliver it. Reference should be made, for example, in Section 2 of the draft Local Plan, Vision and Strategic Objectives, and in the definition of GI at Para 3.43, which currently does not include “blue” infrastructure.

**So the Plan should ensure it places equal emphasis on early and strategic planning for a green infrastructure network to deliver maximum benefits to Aylesbury Vale, as it does on grey (built) infrastructure** such as road and rail connections. This should be set out in the Introduction, Paras 1.17 – 1.19 and at Section 2 (Vision and Strategic Objectives) and in Section 3 (Strategic), and GI infrastructure should be included in the Infrastructure Delivery Plan.

2. 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 the Vale of Aylesbury 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.**

3. **A commitment to work in both the planning and delivery-phase cross-border** with neighbouring authorities to seek opportunities to maximise benefits from GI through growth and development. (NEP GI Principle 7).  
**For example, connected networks** are necessary to maximise the benefits of GI – and this should be a goal at both the landscape and local scale. Although mentioned at bullet a, policy I1 on Green Infrastructure, this could be stated more precisely. We suggest separate acknowledgement of the need to contribute to goals at the landscape scale as well as the District and local scales, and a commitment to look beyond the boundaries - at both a site level and District level, to maximise opportunities arising from GI. We would also suggest the reference to “within the site” should include “and beyond”.
4. **Explicit recognition of, and intention to work positively with the range of both GI and related initiatives already in operation across Buckinghamshire.** (NEP GI Principles 4 and 9)  
 Related to this, 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 Aylesbury Vale and Buckinghamshire or in immediate neighbouring areas. Looking for opportunities for environmental enhancements (which could have multiple benefits), should be emphasised at Para 3.6, which currently points environmental “constraints” only as having shaped the Local Plan strategy, vision, objectives and policies.
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 mechanism to manage into perpetuity. This is more specific, and goes beyond the statement in the current draft Local Plan Policy I1 to secure “on-going” management and maintenance of GI assets (pg 194). 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. The Plan should also make it clear that CIL and s106 / developer contributions monies, as well as other sources, are being considered to fund GI – as is implied in the inclusion of GI in the definition of infrastructure at Para 3.43.
6. **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).
- Connected to this, **the NEP recognises the many potential benefits to house builders through incorporating appropriate GI in their developments.** Many potential buyers will want the benefits of GI, which could therefore be used as a marketing tool.
- **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 long-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 (e.g. via mapping work).**

**7. 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 2020 goals of the [NEP's Biodiversity Action Plan](#) in Buckinghamshire for the expansion of priority habitats.**

- **Include requirements for development to respect, protect and help achieve the aims of a BOA; and also to respect, protect and, where possible, improve 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,** wherever possible. This is so the Local Plan as a whole achieves a net gain, and the impact on biodiversity of development is not restricted to “major” development only – an approach that would wrongly assume minor developments cannot cause significant harm in biodiversity terms.
  - **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 / metric to monitor ecological works – which should be included in the monitoring framework of the Local Plan). NB - at this stage, commitment should be made to at least using a suitable metric to ensure proposed and actual net gains in biodiversity.
  - **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. (Policy NE2, Biodiversity, bullet a [pg 164 of the draft Local Plan], should make reference to such “biodiversity offsetting” as a last resort in the mitigation hierarchy).
  - **Encourage the incorporation of biodiversity in and around developments for the benefit of people and the economy as well as for wildlife** – including details on how this can be achieved (in the Plan or in a separate design guide) - for example, green roofs, green walls, street trees, SUDs schemes including biodiversity, wildflower meadows and grass verges, woodland, etc. (See the NEP's draft “Vision and Principles for the Improvement of GI in Buckinghamshire and Milton Keynes – Principle 8 and Appendix 2). Specific guidance on incorporating biodiversity in and around developments for multiple benefits should inform Policy BE2, Design of new development (Section 8 of draft Local Plan, pg 157).
- 8. All of the NEP's Green Infrastructure “Principles” should be applied to all spatial scales of development across the District.**



**9. 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.

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**WORKING DOCUMENT - Review of VALP – [draft consultation document](#) August 2016 – against the NEP’s GI Principles**

**Sections of the Local Plan reviewed:**

- 2 Vision and strategic objectives – pg 20
- 3 Strategic
- 8 Built environment
- 9 Natural environment
- 10 Countryside
- 11 Detailed infrastructure

**Policies**

- S1-5 Sustainable development for Aylesbury Vale, green belt, infrastructure
- BE2-3 heritage assets, new development design, amenity
- NE1-8 Protected sites, biodiversity, landscape character, AONB and setting, pollution, air quality, local green space, agricultural land, trees, hedgerows and woodlands
- C3 Renewable energy
- C4 Protection of public rights of way
- I1 Green infrastructure
- I2-4 Community facilities, flooding

**TABLE OF NEP’s COMMENTS ON DRAFT PLAN**

Section	NEP’s comments	NEP’s supporting references:  NEP GI Vision and Principles Document NP’s Standard Local Plan Response
<b>3 Strategic</b>		
<b>Sustainable strategy for growth and its distribution</b> (Para 3.6, pg 29)	Mentions environmental “constraints” only. Should also mention environmental opportunities – which should equally shape the strategy, vision, objectives and policies of the draft VALP.	NEP GI Principle 2; also 4 and 9.
<b>9 Natural environment</b>		
Policy NE2 and text (pg 164)	<ul style="list-style-type: none"> <li>a) Welcome net gain to be “sought”. Could be strengthened – net gain <u>required</u> – and make clear this is for <u>all</u> development proposals.</li> <li>b) There is another way – compensation off-site as a last resort.</li> <li>g) Welcome ref to features to encourage biodiversity in the built environment and retaining habitat connectivity. <u>Should be a requirement</u>. See Principle 8 and Appendix 2 of the NEP’s Principles document.</li> <li>h) Need to make <u>use of a metric</u> to measure biodiversity loss, and ensure the gain.</li> </ul>	<p>NEP Standard Local Plan response</p> <p>NEP Standard Local Plan response plus NEP’s GI Principles – see Principle 8 and Appendix 2.</p> <p>NEP Standard Local Plan response</p>
<b>10 Countryside</b>		
<b>10.51+ Renewable Energy</b> (Para 10.59+, pg 188)	<p>Welcome policy C3, Renewable Energy, much of which aligns with the NEP’s standard response regarding renewable energy.</p> <p>Could the Policy also promote renewable energy, where appropriate, in existing, as well as new developments?</p>	NEP Standard Local Plan response
<b>11 Detailed infrastructure</b>		
Green Infrastructure (I1) – pg 194	<p>Welcome reference that the “council will implement the most up to date GI Strategy”, and many other aspects of the policy.</p> <p><b>Please make explicit reference to NEP’s GI Vision and Principles</b>, which includes the definition of GI, and support for the county-wide Vision, and the need to translate it to apply in the District.</p> <p>This should include support and commitment to providing GI for local needs and for higher-level, strategic needs.</p>	GI Principles document

	<p><b>Development proposals should look not just “within the site” but beyond it</b> – in line with the NEP’s GI Principle 7 regarding the coordinating GI creation and improvement with activities and existing networks cross-border.</p> <p>In addition – <b>recognition of the order of biodiversity mitigation hierarchy</b> – should provide for mitigation off-site where not possible on-site.</p>	<p>Principle 7</p> <p>NEP Standard Local Plan response</p>
	<p>“No net loss and where possible a net gain”</p> <p><b>This needs to be stronger e.g. " all developments must deliver a net gain in biodiversity where possible".</b></p> <p>Commitment should be made to using a suitable metric to ensure proposed and actual net gains in biodiversity.</p>	<p><i>(NEP GI Principles 4 and 6; also see NEP Standard Local Plan Response)</i></p> <p><i>MK - has stronger wording.</i></p> <p><i>Draft WDC Local Plan - has stronger wording - commits to ensuring a net gain in biodiversity across the District as a whole over the period of the Local Plan.</i></p>
	<p>How does ANGSt – supported in Para 11.10, relate to the “Assessment of Leisure and Cultural Facilities, 2012 criteria – noted in Policy I1 on Green Infrastructure – pg 194)?</p> <p><b>Need to make clear if seeking ANGSt criteria or the Assessment of Leisure and Cultural Facilities criteria</b> - with appropriate justification.</p>	<p>NEP Standard Local Plan response</p>
	<p>Secure ongoing maintenance – we would welcome a <b>stronger requirement for GI to be managed into the long-term</b> in line with the NEP’s GI Principles – which would help protect GI into the future including against cumulative pressures.</p> <p>The aim would be secured GI management into perpetuity – with the developer securing maintenance for 25-30 years and making provision beyond that. Principle 5 provides example mechanisms.</p>	<p>Principle 5</p>
	<p><b>ALL development should apply the principles and look for opportunities – within site and surrounding it – to protect, enhance and create GI for its multiple benefits.</b> Protecting, enhancing and providing green infrastructure should be considerations in all development decisions, at all scales.</p> <p>In particular <b>we would welcome more emphasis on:</b></p> <ul style="list-style-type: none"> <li>• <b>Early and strategic planning of GI</b> for its value and benefits – both at the strategic scale and at all other spatial scales of development.</li> <li>• Recognition of the <b>importance and necessity of GI</b></li> </ul>	<p>NEP GI Principles 1, 2, 3, 4, 5, 6, 8, 9</p>

	<p><b>as equal to that of constructed, grey infrastructure</b> such as road and rail networks. For example, GI can support the Buckinghamshire economy, as well as health and climate change initiatives. NEP’s Principle 3 lists some of the benefits provided by GI.</p> <ul style="list-style-type: none"> <li>• <b>Connected networks</b> are necessary to maximise the benefits of GI for wildlife and for people. This should be a goal at both the landscape and local scale, aiming for sustainable means for access and movement within and outside urban areas, with sufficient buffers to protect the wildlife value of GI.</li> </ul> <p><b>Connected networks</b> are mentioned at bullet a, policy I1 on GI - but could be stated more precisely and explain how this relates to “within the site”. Suggest separate acknowledgement of the need to contribute to goals at the landscape scale as well as the District and local scales.</p> <p>We would request an explanation is provided at “connected open spaces” (I1, pg 194) – and for this section to explicitly support the NEP’s GI Principle 6 – that <b>connected networks of GI are necessary both at the landscape and local level</b>, to maximise the benefits.</p> <ul style="list-style-type: none"> <li>• <b>GI improvement and provision should be prioritised in locations where it can deliver most benefits.</b> Opportunities to maximise the benefits of GI across Buckinghamshire’s and Milton Keynes’ environment, health and economy, should be explored both strategically, when planning for GI provision ahead of growth and development, and when mitigating the impacts of development.</li> </ul> <p>For example – certain locations may maximise multiple benefits: e.g. within and through urban areas and development, to link urban to rural areas, in built design to include biodiversity requirements, and to provide access to countryside on your doorstep (compare ANGst with Leisure and Cultural Facilities) (pg 192), including in areas with high indices of multiple deprivation.</p> <ul style="list-style-type: none"> <li>• Alongside provision, <b>providing for the encouragement to use</b> local green spaces (within Principle 5, NEP GI Principles document)</li> <li>• <b>GI planning and development should be linked and relevant to, informed by and coordinated with, other policy areas, strategies, activities and reviews</b> that could affect GI provision and quality in Buckinghamshire (Principle 9)</li> </ul>	
<p><b>Flooding</b> (pg 199+)</p>	<p>Welcome recognition of the need for water quality to “...be maintained and enhanced by avoiding adverse effects of</p>	<p>NEP standard Local Plan response;</p>

	<p>development on the water environment”.</p> <p>The NEP would welcome more emphasis on</p> <ul style="list-style-type: none"> <li>• <u>the need to seek opportunities to protect and enhance biodiversity, and increase amenity value, of water courses</u>, in development proposals.</li> <li>• Specific mention of an <u>ecological “buffer” to counter negative impacts of development on water courses</u>. Impacts may be to water quality, ecology, amenity, etc.</li> </ul>	<p>NEP’s “State of the Environment” report – on NEP website.</p>
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