

# Plan:MK Topic Paper - Issues Consultation Open Space and the Natural Environment

September 2014



[www.milton-keynes.gov.uk/PlanMK](http://www.milton-keynes.gov.uk/PlanMK)

Plan:MK



## Plam:MK Topic Papers - Issues Consultation

### Introduction

Plan:MK, a new Local Plan for Milton Keynes, will set out a development strategy for Milton Keynes up to 2031 with a range of detailed policies to guide development over this period.

It will replace the Core Strategy, adopted in 2013 and the existing Local Plan (2005) which together currently form the part of development plan for the Borough.

Once complete, Plan:MK and any Neighbourhood Plans, will be the starting point for planning advice, (other than for Minerals and Waste) and decisions made by the Council. It will set out how much development is expected over the plan period and the location of development sites across the Borough. It will also include detailed policies to ensure that all development is of high quality and respectful to the character of Milton Keynes, and that unplanned development only occurs where it is appropriate.

Plan:MK has to be prepared within the context of national planning policy and within the legislative framework set out by the Government. This Topic Paper is part of the first stage in the process where we are seeking initial view of the public and other interested parties on what should be in Plan:MK.



### What is the purpose of the Topic Papers?

This is one of a series of Topic Papers published by the Council at this time. In total there are twelve Topic Papers covering:

- Growth in Housing
- Employment and Economic Development
- Town Centres and Retail
- Transport and Travel
- Rural Issues
- Provision of Physical and Social Infrastructure
- Quality of Place
- Culture, Recreation and Quality of Life
- Open Space and the Natural Environment
- Climate Change and Sustainability
- Duty to Cooperate
- The Way Forward: Preparing a Vision and Development Strategy for Plan:MK

Each of the Topic Papers is available on the Council website at <http://www.milton-keynes.gov.uk/planmk>

The aim of the papers is to engage everyone with a stake in the future growth and development of Milton Keynes in the preparation of Plan:MK. They cover a range of topics, sometimes interlinked, which the Council have identified as being key to the development of the Plan.

Each paper summarises the background to the topic, setting out data and policy context, before highlighting key issues and posing questions for the reader - the responses to which will help the Council in the development of Plan:MK.

The final topic paper, "The Way Forward" draws together issues raised in the preceding papers and considers what they mean for the Vision and Development Strategy.

When we produce the final version of Plan:MK, the Vision and Development Strategy will be at the start of the Plan, setting the scene for the policies that will follow.

These Topic Papers are being published for consultation in accordance with Regulation 18 'Preparation of a local plan' of the Town and Country Planning (Local Planning) (England) Regulations 2012.



## How to respond

The Council would appreciate any feedback you have on the Topic Papers. In particular, if you can focus on the questions posed it will help with the development of the plan. Feedback can be submitted:

- Online via our consultation portal: <http://miltonkeynes-consult.objective.co.uk>
- Via email: [PlanMK@milton-keynes.gov.uk](mailto:PlanMK@milton-keynes.gov.uk)
- In writing: Development Plans, Civic Offices, 1 Saxon Gate East, Central Milton Keynes, MK9 3EJ

All comments should be received by **5pm on Wednesday 3rd December 2014.**

## How will the feedback be used?

The next stage of the process will be to develop a Preferred Options document, which will set out the Council's initial draft of Plan:MK.

Feedback from this Issues consultation will help to shape the options considered as part of the development of the Preferred Options. These options will evolve through further focused consultation with key stakeholders.

The Council expects to publish the Preferred Options document for consultation in 2015.

The overall aim is to get a final plan prepared by early 2016, at which time it will be submitted to the Government and be subject to independent examination.



## Introduction

**1** One of the main characteristics of the planning and development of Milton Keynes is the high quality of its landscape. Right from the inception of the New Town it was recognised that a positive relation and interconnectivity between landscape, in which trees and other natural features dominate, and townscape dominated by buildings, structures and hard surface will play an important role in creating a place where people will enjoy living, working and visiting.

**2** Milton Keynes' landscape is characterised by a well-connected framework of green space throughout the city. This continuity derived from the 1970 original Milton Keynes Plan policy framework of low residential density development, golf courses within the city's boundaries and green corridors of the main roads; and from the presence of the canal, the rivers and their floodplains, which necessitated the provision of linear parks to deliver an effective flood management system (Plan for Milton Keynes Volume Two, 1970).



**3** The green corridors, linear parks and areas of woodland draw the countryside into the city. While this is likely to have a positive impact on nature in terms of supporting ecological networks, it may result in blurring the character of the place as a city, something that the original town planners considered being undesirable.

**4** The network of linear parks that includes watercourses and lakes significantly contributes to a green character, effective flood management, and abundant leisure and recreation opportunities for residents. Within the whole Borough public open space covers approximately 3,200 ha (7,907 acres) - over 129 ha per 1000 population, placing it among the highest local authorities in terms of open space per resident. For example, in Northampton and Peterborough, which are of a comparable size to Milton Keynes, the ratio of open space per 1000 population is 78 ha/1000 and 93 ha/1000 respectively.

**5** The model of parkland management in Milton Keynes is different to management in other cities. The responsibilities for managing public open space in the Borough are shared between three key partners: Milton Keynes Parks Trust, Milton Keynes Council and Town and Parish Councils.

**6** The majority of public open space in the city is managed by the Milton Keynes Parks Trust, a charity whose primary object is to provide, maintain and equip green spaces in and around Milton Keynes.

**7** While the freehold of strategic open space belongs to Milton Keynes Council, the Parks Trust has a 999 year lease. The lease came with an endowment of approximately £20 million for the 1,800 ha (nearly 4,500 acres) enabling the Parks Trust to manage the strategic open space in perpetuity. The endowment was mainly commercial property, whose rental income funds the Trust. Since the transfer in the early 1990's, some property assets have been sold (and others acquired) to sustain the Trust's income.

# Introduction

**8** Today, the Parks Trust have an estate of approximately over 2,000 ha (5,000 acres) of parks, meadows, river valleys, woodlands, lakes and the landscaped corridors along the grid roads. As new parks and open spaces are established, they are transferred to the Trust with an endowment. As with the original set up, the capital sum provides the income to cover maintenance costs.



**9** Milton Keynes Council (MKC) is responsible for managing 1200 ha (2965 acres) of public open space which is generally more fragmented with many small pieces of land spread throughout the Borough, but also including some larger areas such as Emberton Country Park.

**10** Town and Parish Councils have a range of powers and responsibilities, for example, the provision of allotments. It is possible for Town and Parish Councils to take full responsibilities for managing public open space in their areas. Currently this is the case with Stony Stratford Town Council and West Bletchley Parish Council.

**11** Figure 1 'Public Open Space managed by Milton Keynes Council' and Figure 2 'Public Open Space managed by the Parks Trust (2014)' below show the extent of public open space in the Borough that is managed by the Parks Trust and MKC in Milton Keynes.

Figure 1 Public Open Space managed by Milton Keynes Council

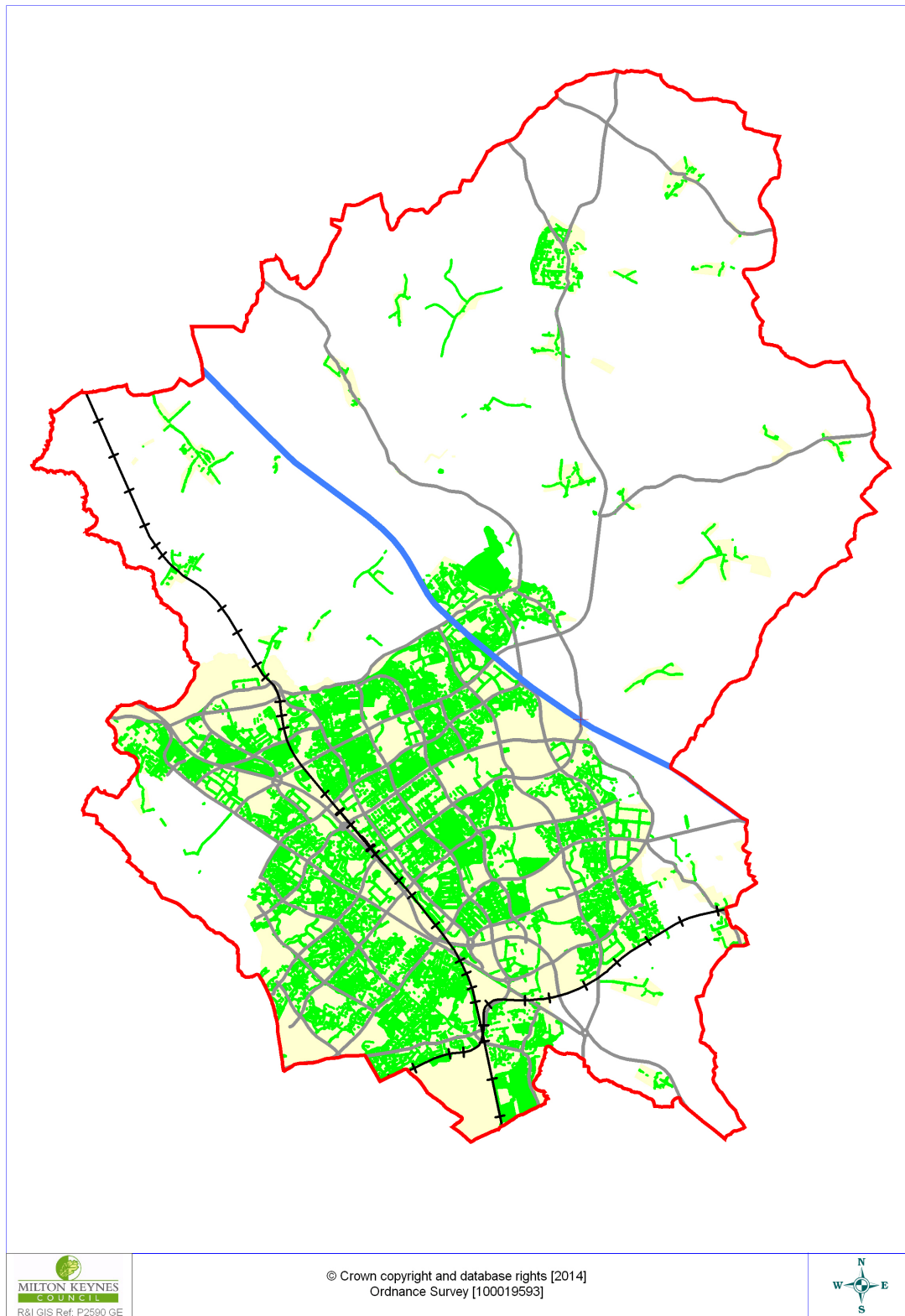


Figure 2 Public Open Space managed by the Parks Trust (2014)



Source: <http://www.theparkstrust.com/parks/map> Accessed on 24/3/2014)

**12** In terms of national designation, there are five Sites of Special Scientific Interest (SSSI)<sup>(1)</sup> within or adjoining the Borough boundaries. These are: Oxley Mead, Howe Park Wood, Yardley Chase, Salcey Forest and Mill Crook. There are no National Nature Reserves within or immediately adjacent to the Borough, but we do have sites that are locally important, for example the Blue Lagoon Local Nature Reserve - a Local Nature Reserve site.

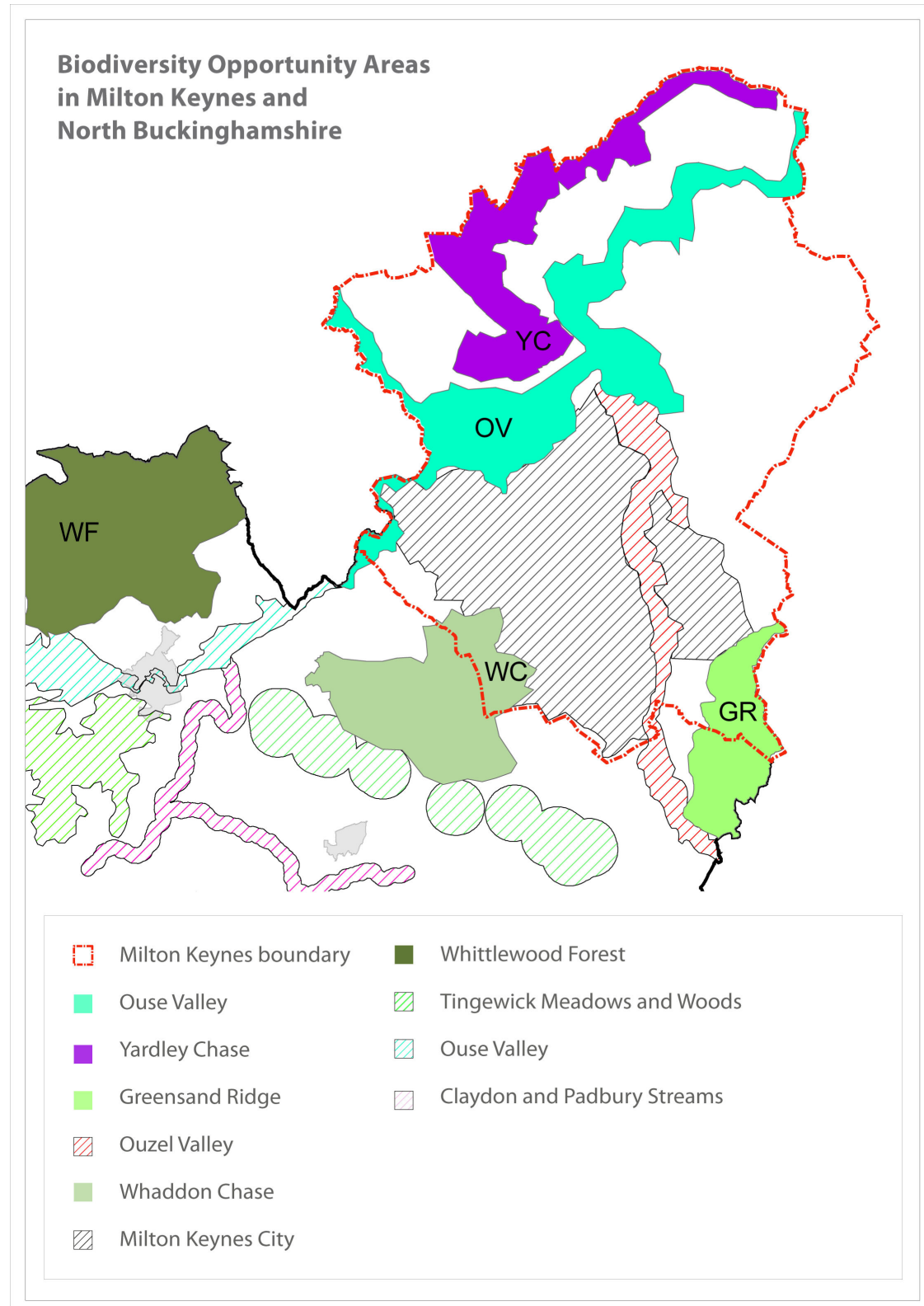
**13** At the County scale, Biodiversity Opportunity Areas are being developed by the Buckinghamshire and Milton Keynes

Biodiversity Partnership. These are target areas with the potential for landscape scale biodiversity projects. The boundaries of the areas were originally drawn up using Landscape Description Units and were subsequently amended where necessary. They include a focus on habitats that are valuable at the National/County scale and areas where projects or groups are currently active and landowners are known to be amenable. The Opportunity Areas identified in Milton Keynes and adjacent to its boundaries are shown in Figure 3 'Biodiversity Opportunity Areas in Milton Keynes and North Buckinghamshire'.

<sup>1</sup> SSSI is a conservation designation denoting a protected area in the United Kingdom. SSSIs are the country's very best wildlife and geological sites



**Figure 3 Biodiversity Opportunity Areas in Milton Keynes and North Buckinghamshire**



Source: Buckinghamshire & Milton Keynes Biodiversity Partnership, available at:  
<http://www.buckinghamshirepartnership.co.uk/media/1022513/boasfinal.pdf>

**14** In June 2011 the Government released 'The Natural Choice', the first White Paper on the natural environment in 20 years.

**15** The Natural Environment White Paper (2011)<sup>(2)</sup> acknowledges that there is consensus about the innate value of nature and that a *"healthy, properly functioning environment is the foundation of sustainable economic growth, prospering communities and personal wellbeing"* (Please see Natural Environment Policy Section for more details about the White Paper).



**16** The White Paper also introduced a number of initiatives including Local Nature Partnerships. These are the partnerships of a broad range of local organisations, businesses and people who aim to help bring about improvements in their local natural environment. A Local Nature Partnership has been set up for Buckinghamshire and Milton Keynes through the Natural Environment Partnership.

**17** Open space and natural environment issues are considered separately in this topic paper. Both, the open space and natural environment sections frequently refer to Green Infrastructure (GI) - a network of high quality green and blue spaces and other environmental features. GI includes parks, open spaces, playing fields, woodlands, wetlands, grasslands, river and canal corridors allotments and private gardens.

**18** Whilst open space contributes to protecting and enhancing our natural environment and biodiversity, in most cases it will require different management approaches, and consequently a separate set of policies.

**19** Also, this paper does not directly discuss issues related to the need and provision of sport and leisure facilities (including playing fields) as these are covered in the Council's recently adopted Sport & Active Communities Strategy (March 2014)<sup>(3)</sup>.

2 The Natural Environment White Paper is available at:  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228842/8082.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228842/8082.pdf)

3 The Strategy is available at: <http://www.milton-keynes.gov.uk/leisure-tourism-and-culture>

## Open Space - Policy Background

### National

**20** The Government recognises the importance of access to open space as a key part of successful and sustainable communities. As stated in paragraph 73 of the National Planning Policy Framework (NPPF) “access to high quality open space and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.” The NPPF recommends policies be based on robust and up to date assessments of the needs for open space, sport and recreation facilities and opportunities for new provision. Such an assessment should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area (NPPF, para 73).



**21** Section 8 of the National Planning Policy Framework (NPPF) “Promoting healthy communities”, states that planning policies and decisions should aim to achieve places which promote:

- *Safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.*

**22** The Framework also sets out the criteria that should be satisfied before existing open space, sports and recreational buildings and land, including playing fields is developed (NPPF, para 74).

**23** In addition, paragraph 75 says that planning policies should protect and enhance public rights of way and access. Further, that local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

**24** The NPPF allows for the special protection of green areas of particular importance to local communities, with the introduction of the Local Green Space designation. This designation can be identified through a local plan or neighbourhood plan process (NPPF, para 76 & 77)



# Open Space - Policy Background

## Local

### Local Plan (2005)

**25** The Local Plan includes policies that aim to protect, enhance and extend the city's strategic green infrastructure such as linear and district parks (Policies S12 and L1).



**26** Policy L2 of the Local Plan aims to protect existing areas of open space from development and also to ensure that development proposals address any unmet need for community facilities. This policy distinguishes between and defines recreational open space, amenity open space and leisure and recreational facilities.

**27** The Council's open space provision standards are set out in Policy L3 and Appendix L3. These standards are used to determine the type and size of open space that new developments are meant to contribute. The emphasis of Policy L3 and its appendix is on meeting specific local recreational needs in a flexible manner providing a wide range of quality facilities. Plan:MK will seek to review these standards.

### The Core Strategy (2013)

**28** The Core Strategy also contains guidance and policies on the importance of open space. The Core Strategy Vision states:

*12. The linear parks will be extended along the Broughton, Caldecotte and Loughton brooks into the city extensions, and along the Ouse and Ouzel valleys to the north. These multi-purpose open spaces will provide extended leisure routes, strategic flood management, improved wildlife habitats and new sports provision, helping provide the population with opportunities for more healthy lifestyles.*



**29** The importance of open space is also evident in the Core Strategy objectives:

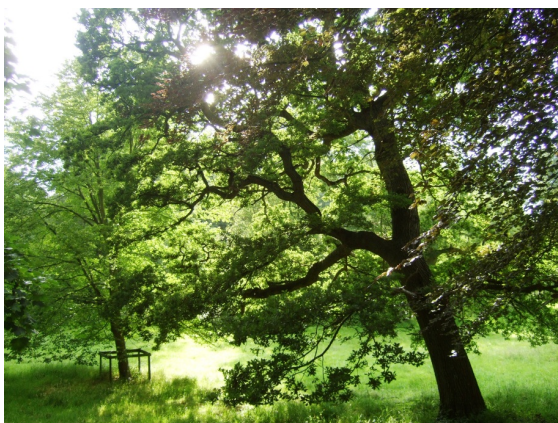
*11. Place Making...sustainable built environments with easy access to open space...*

*13. To encourage healthy lifestyles with the provision of recreation facilities and biodiversity by enhancing the linear park network and extending it into new developments while conserving and enhancing landscapes and important habitats.*



**30** Core Strategy Policy CS19 is also relevant to this topic paper:

*The Historic and Natural Environment - green infrastructure will be protected and enhanced. Open space will be provided in line with the Council's standards.*



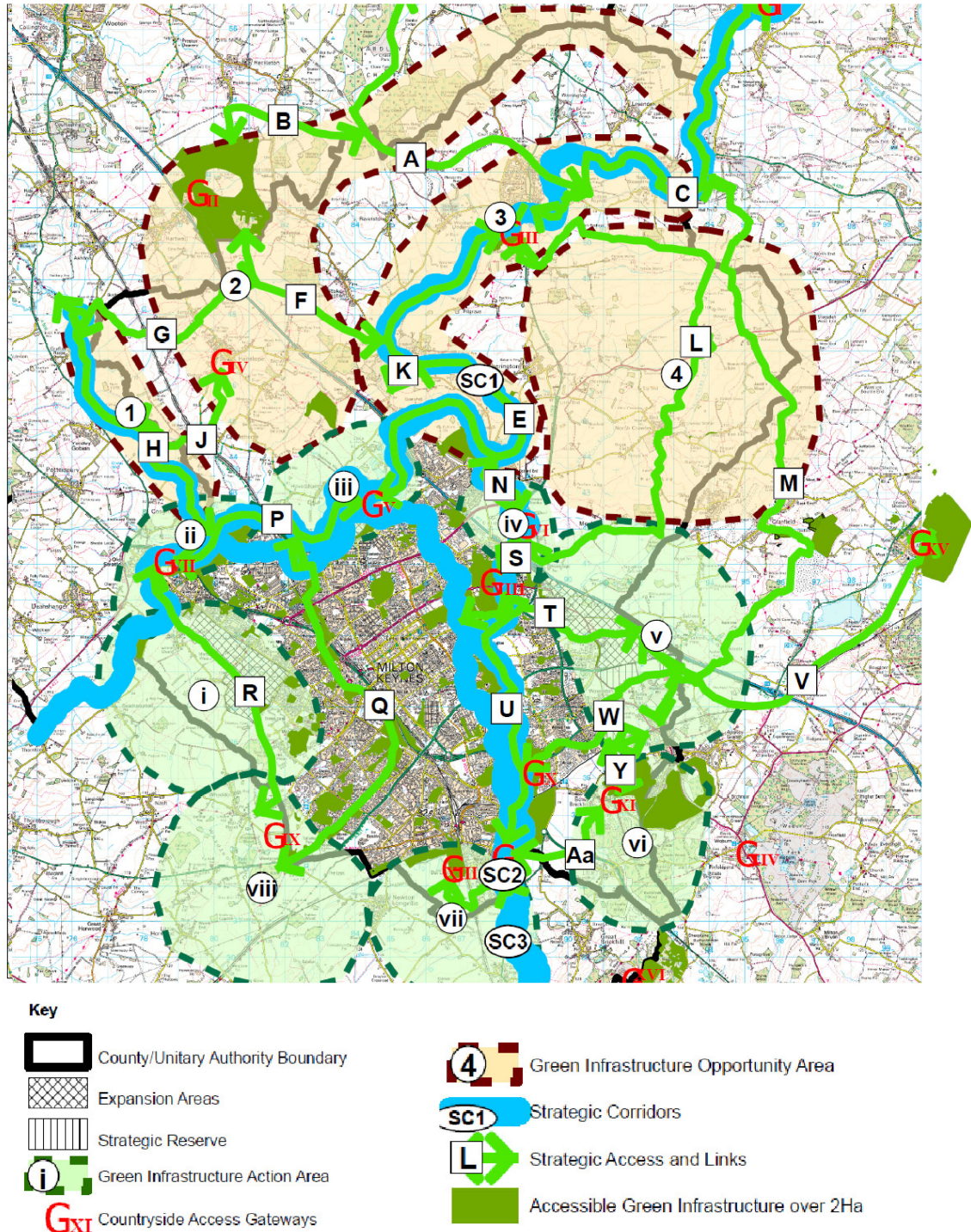
**31** The Core Strategy recognises that areas of opportunity identified in the Green Infrastructure Plan should be taken into account when considering any sites through Plan:MK. The Green Infrastructure Plan (2008)<sup>(4)</sup> is an important evidence base document that should be used to inform Plan:MK which includes a set of guiding principles for green infrastructure within the borough:

- Landscape character
- Historic/ archaeological heritage
- Wildlife and biodiversity
- Public access and accessibility
- Community greenspace/ involvement opportunities
- Connectivity
- Multi-functionality
- Landmark projects

**32** The GI plan, in addition to Green Infrastructure Opportunity Areas, identifies eight Green Infrastructure Action Areas (GIAAs). They are priority areas for new or enhanced green infrastructure and will help to address perceived deficit or lack of opportunity in existing development. The purpose is to provide locally accessible green space. Both the opportunity and action areas are shown on Figure 4 'Green Infrastructure Opportunity and Action Areas - MK GI Plan'.

# Open Space - Policy Background

Figure 4 Green Infrastructure Opportunity and Action Areas - MK GI Plan



Project Milton Keynes Green Infrastructure Plan  
 Drawing Green Infrastructure Plan and Accessible Green Infrastructure

Dwg No. 07012/R31A  
 Scale 1:100,000  
 Date December 2007  
 Drawn OB Checked RS



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Source: Milton Keynes Green Infrastructure Plan (2008). Credit: The Landscape Partnership

## Public Open Space Management Framework

**33** In 2013 the Council adopted its Public Open Space Management Framework (2013-2023)<sup>(5)</sup>. The Framework identifies the key actions that need to be achieved in order to achieve high quality, sustainable and viable public open space in the Borough. The Framework seeks to identify and map all public open space and set quality standards and commit to meeting them. This will include identifying areas of deficiency and surplus and developing plans to address imbalances.

**34** Also, the Framework confirms that MKC will seek to devolve public open space where a suitable organisation exists to manage it.



## Play Area Action Plan

**35** In December 2013 the Council adopted its Play Area Action Plan (2013-2023)<sup>(6)</sup>. The plan sets out a series of “actions” for play area specification. Action P6 is relevant to Plan:MK and recognises the need to plan high quality district-scale play sites with multi-generational play opportunities and the potential to host noisy and boisterous activities (such as skateboarding) without negatively impacting upon the wider community.

5 The Framework is available at: <http://cmis.milton-keynes.gov.uk/CmisWebPublic/Binary.ashx?Document=38631>

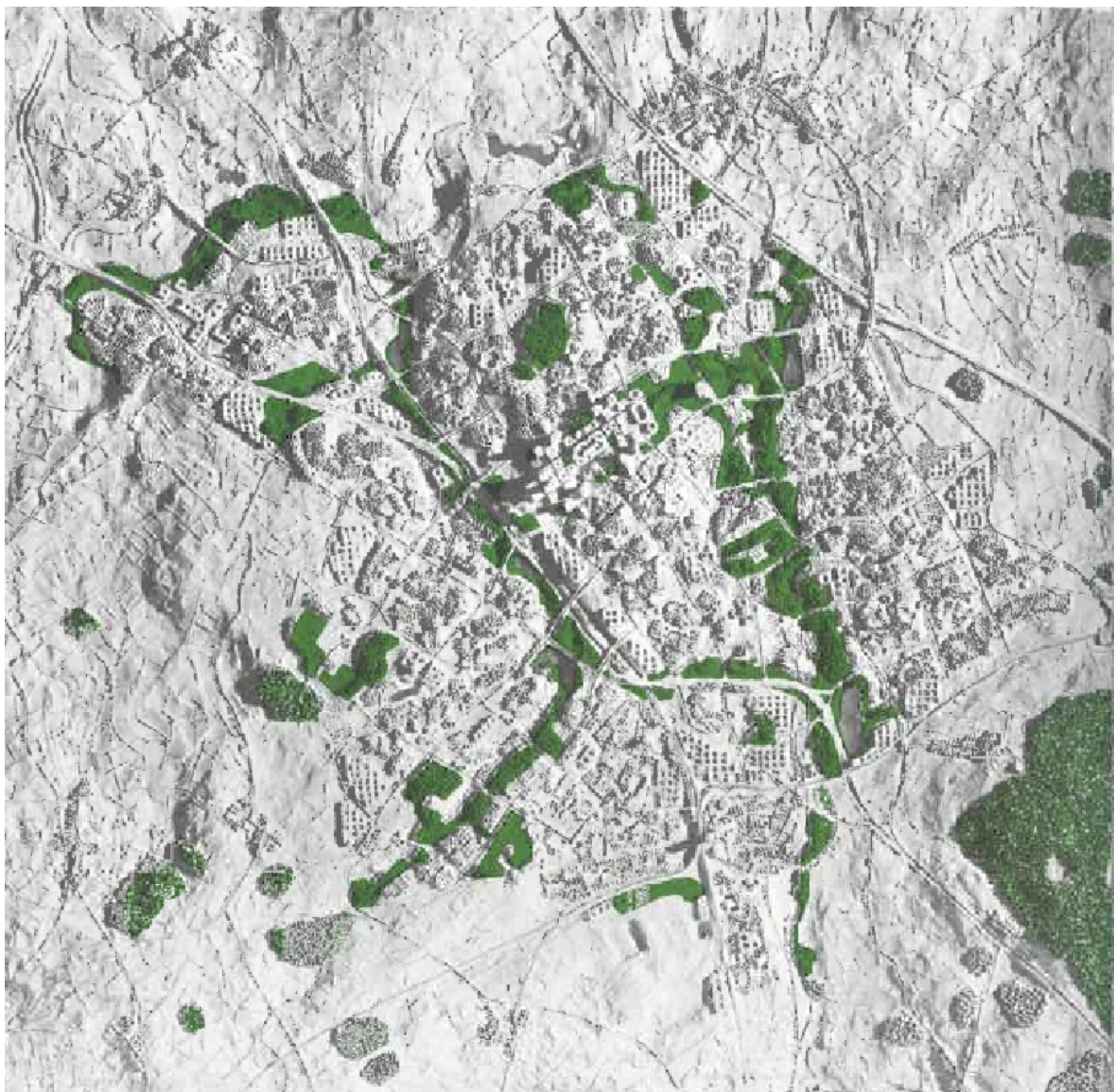
6 The Play Area Action Plan is available at: <http://cmis.milton-keynes.gov.uk/CmisWebPublic/Binary.ashx?Document=41323>

## Open Space - Local Context and Issues

**36** Public open space helps define the character of Milton Keynes and contributes to its unique identity, quality of life and social and economic well-being. As highlighted at the beginning of this paper the strategic open space such as linear parks, balancing lakes or green corridors is a result of the policy decisions of the 1970 Milton Keynes Plan. The city's green framework as envisaged in the original Plan is shown in Figure 5 'Major open spaces, 1970 Plan for Milton Keynes'.



Figure 5 Major open spaces, 1970 Plan for Milton Keynes





**37** It is noticeable that over the years this green framework has not eroded but matured and expanded. Both the Local Plan (2005) and the Core Strategy (2013) advocate the expansion of the city's linear parks and additions of new open spaces. This is in keeping with the original principles of continuity and fluidity of green space included in the 1970 city's plan.

**38** As mentioned earlier in this Paper, The Milton Keynes Parks Trust is by far the largest partner involved in the management of open spaces in the city, however there are also other partners such as Town and Parish Councils or non-governmental organisations and charities (for instance Milton Keynes Play Association or Milton Keynes Green Gym) who play an important role in maintaining existing open spaces as well as delivering new projects. The extent to which these organisations presently manage public open space varies across the Borough, however it is worth highlighting that the Milton Keynes Open Space Management Framework confirms that the Council seeks to devolve public open space where a suitable organisation exists to manage it. Currently, only West Bletchley Parish Council and Stony Stratford Town Council independently manage their public open space. However, this may change over time as more Neighbourhood Plans are being implemented.



**39** Public open spaces not only form a physical network, but due to a multiple of stakeholders involved in its management, also form an organisational network. The management of one open space may have an impact on other spaces in the network. To ensure this interaction is positive, land managers should adopt a collaborative and coordinated approach into their work. At this point it is worth emphasising that public open space is not necessarily "green", it could be an outdoor (and possibly an indoor) civic space, market squares, or some other part of the public realm. In a city centre location some of that space may be privately owned and managed but is still publicly accessible, for example Queen's Court in the CMK Shopping Centre or Mortimer Square at the Hub:MK.

**40** Public open space is an essential ingredient of successful neighbourhoods; it provides a wide range of social, economic and environmental benefits to local communities. Surveys repeatedly show how much the public values them, while research reveals how closely the quality of public spaces links to levels of health, crime and the quality of life in every neighbourhood. It is expected that Milton Keynes with its ageing and more diverse population, which, due to increases in obesity and other diseases, will have even greater need of the health and social benefits offered by good quality open space than in the past.

## Open Space - Local Context and Issues

**41** Some more popular play areas or sport facilities, such as wheeled sport facilities, may result in attracting an audience from a wider than local catchment and thus these areas should have access to public transport and other facilities such as car parking or public toilets. The MKC Play Area Action Plan (2013) calls for an assessment of the likely significant environmental effects arising from a proposed development. The Action Plan acknowledges that the level of impact assessment should be determined both by the type of play area proposed and the context of the site; by virtue of factors such as its effect on the neighbouring properties, size, nature or location.

**42** Well-designed open space provides space for recreational activities improving physical health and fitness and mental health and wellbeing. Open spaces like allotments and community orchards are also productive, yielding the fresh fruit and vegetables that are essential to a healthy diet. It is worth remembering that community orchards and urban food growing were always popular activities in Milton Keynes with hundreds of community orchards and some food growing projects pepper-potted around the city (e.g. Urban Farm in Wolverton or cattle grazing in the city parks)<sup>(7)</sup>.

**43** Open space affords opportunities for social interaction between people of different communities, fostering social inclusion and community development. It can often become a focus for community activity, involvement and capacity building, thereby helping to develop citizenship and local pride and reducing anti-social behaviour and crime. Open space provides opportunities for people to get involved in creative and cultural activities by supplying a venue for cultural events and festivals or public art installations. These issues are also discussed in the Culture, Recreation and Quality of Life Topic Paper.

**44** Our district parks often accommodate playing pitches and are used for formal sports (e.g. multi-use pitches in Great Linford Park or Campbell Park's Cricket Green). However, a recent consultation on the Playing Pitch Strategy highlighted that sport users do not prefer this shared space approach as the pitches' quality is often compromised by dog fouling or unofficial use.



**45** In Milton Keynes open space has always been seen as a holistic interconnected unit (1970 Plan for Milton Keynes), not only with other areas of open space but also to other land uses. As mentioned above, open space has an important role in flood mitigation, nature and habitat conservation and can also help with urban food production. This approach is consistent with the Natural Environment White Paper which advocates establishing coherent and resilient ecological networks that will help us both mitigate and adapt to climate change e.g. storing carbon or flood management (ecosystem services).

## Question 1

### Open Space Management

- How could Plan:MK influence open space management so it delivers a robust green infrastructure.
- How do we ensure that development does not result in fragmentation/ or prevent better integration of green infrastructure networks?
- Should Plan:MK introduce requirements to ensure that playing pitches are fenced in order to prevent their surface being damaged?



**46** Public open space is made up from a number of different types of spaces; these are defined in Table 1 'Public Open Space Categories'. These typologies have been based on the now deleted PPG17 (Planning Policy Guidance 17: Sport and Recreation) and the local context, notably the Local Plan Policy L3 and Appendix L3. Also, Figure 6 'Existing Accessible Green Infrastructure in the Borough and close to its boundaries' shows a spatial distribution of the existing (2008) accessible green infrastructure.

**Table 1 Public Open Space Categories**

Type of Space	Description
<b>Amenity or incidental space</b>	Commonly found in housing areas, they include informal recreation spaces and green spaces in and around housing. These spaces define the character of the estates and provide opportunities for informal activities close to home or work
<b>Local play areas</b>	Includes equipped play areas predominantly those under the age of 8 years close to home. Providing opportunities for play, physical activity and social interaction.
<b>Neighbourhood play areas</b>	Includes equipped play areas, ball courts, skateboard areas and teenage shelters with the primary purpose of providing opportunities for play, physical activity and social interaction involving both children and young people.
<b>Parks and gardens</b>	Urban parks, country parks and formal gardens, open to the general public that provide opportunities for various informal recreation and community events. - These are subdivided
<b>Areas of Wildlife interest - Natural and semi natural</b>	Space includes woodlands, scrubland, orchards, grasslands (e.g. meadows and non-amenity grassland), wetlands and river corridors, nature reserves and brown field land with a primary purpose of wildlife conservation and biodiversity



# Open Space - Local Context and Issues

Type of Space	Description
<b>Destination and Country parks</b>	These are spaces that actively attract visitors from a wide catchment, typically further than 10 miles. They offer unique or novel experiences that extend visiting time.
<b>Linear parks</b>	Key structural component of MK, following the water bodies across the city they have an important green infrastructure role: mitigating flood events, preserving archaeology, as pedestrian and cycle corridors, for wildlife and recreation. The feel of the corridors change across the city, more formal in urban areas and more agricultural on the periphery.
<b>Allotments</b>	Includes all forms of allotments including urban farms and gardens that provide opportunities for people to grow their own produce as part of the long-term promotion of sustainable health and social inclusion.
<b>Transport corridors</b>	Define the urban form of Milton Keynes, flanking the main grid roads they buffer local communities from the visual impact of vehicles and providing an attractive landscape feature to the motorist
<b>Outdoor sports facilities and playing fields</b>	Is a wide ranging category of open space, which includes both natural and artificial surfaces for sport and recreation that are either publicly or privately owned, they include playing pitches, athletics tracks, bowling greens and golf courses with the primary purpose of participation in outdoor sports.
<b>Civic spaces</b>	Includes civic and market squares and other hard surfaced community areas designed for pedestrians The primary purpose of providing a setting for civic buildings, public gatherings and community events.
<b>Cemeteries and church yards</b>	These include private burial grounds, local authority burial grounds and disused churchyards. The primary purpose of this type of open space is for burial and quiet contemplation but allows for the promotion of wildlife conservation and biodiversity.

**47** The present standards as laid out in the Local Plan and its Appendix L3 were derived from Local and National policy, through bench marking with similar areas. The standards were designed to ensure that all members of the community had access to a range of good quality spaces and associated facilities. These standards are applied to new developments and to identified improvement schemes or new schemes within existing development.





**48** The 2005 Local Plan and its supplementary planning guidance set out the standards for a space in predominantly quantitative terms, but there is a general lack of a qualitative guidance in support of it. These qualitative and quantitative functions must be seen in relation to the cost of providing these open spaces and the benefits they bring to the community. Clearly the cost and benefits of a given piece of public open space needs to be measured to ensure the best possible outcome can be achieved from the budget available. For example in the last Local Plan some areas of the linear park network were removed to facilitate the delivery of development. These changes did not undermine the purpose of the linear park network and in fact in the case of changes to the north facilitated the delivery of linear park objectives by enabling the creation of the Stanton Low Country Park.

**49** The NPPF (para 73) sets out the need to assess the quality, quantity and accessibility of public open space provision and the needs of the community. This is a vital next step for Milton Keynes and we will work closely with Town and Parish Councils to understand the perceptions of the community with regards to overall levels of open space provision and contribution to local quality of life.

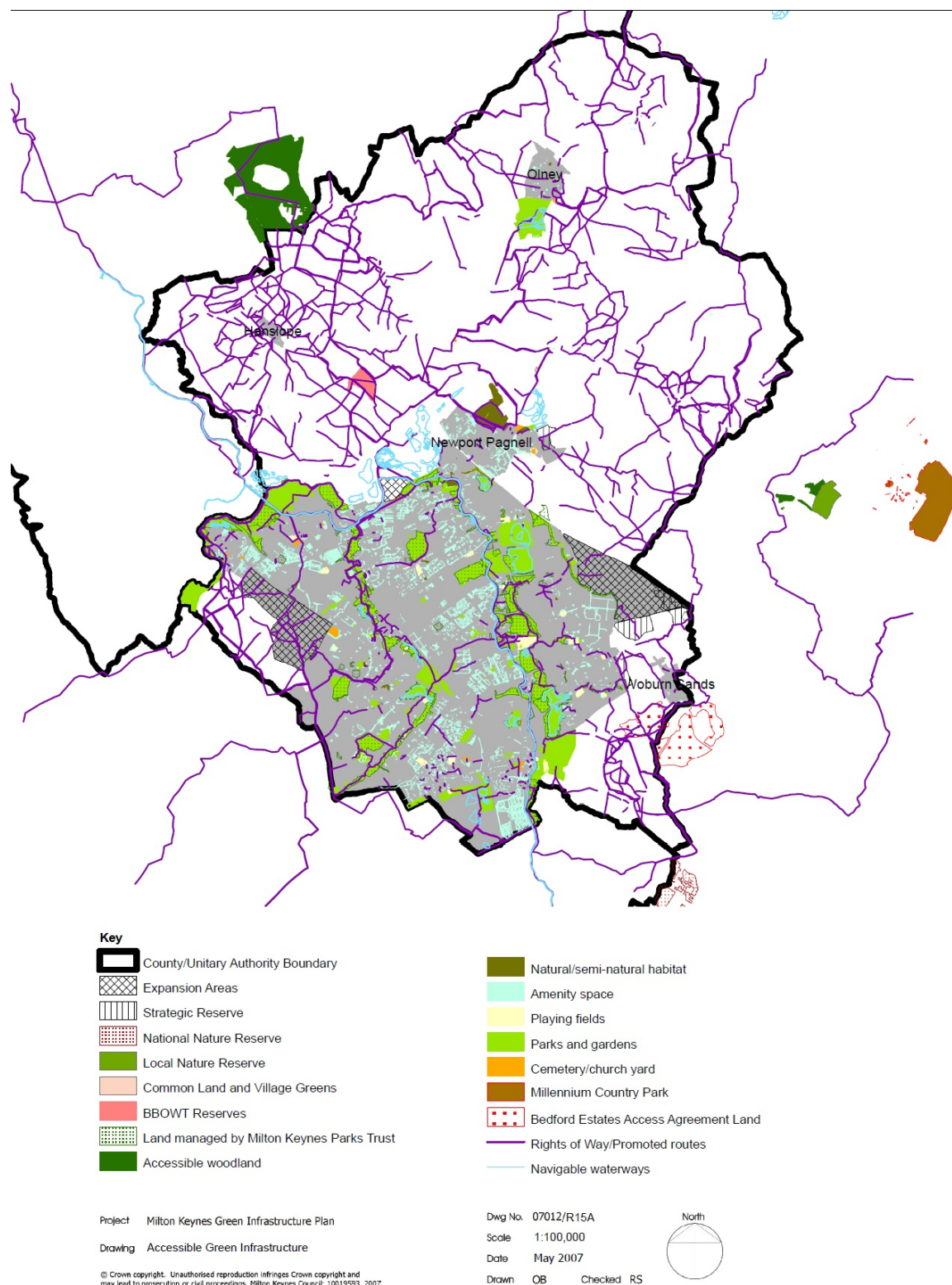
### Question 2

#### Open Space Assessments

- Should an open space assessment be carried out for Plan MK? Should it include all the existing open space?
- Should Plan:MK identify standards for quality, quantity and accessibility of open space and develop an open space audit / assessment methodology?
- Should the existing requirements for open space (Local Plan Policy L3 and Appendix L3) be reviewed, or are the standards still effective?

# Open Space - Local Context and Issues

**Figure 6 Existing Accessible Green Infrastructure in the Borough and close to its boundaries**



Source: Milton Keynes Green Infrastructure Plan (2008). Credit: The Landscape Partnership

## Natural Environment - Policy Background

**50** The importance of the natural environment is recognised at all levels of policy guidance, including at the international level.

### International

**51** The EU 2020 Biodiversity Strategy - outlines a long-term vision of ensuring that by 2050 European Union biodiversity and the ecosystem services it provides are protected, valued and appropriately restored.

### National

**52** Section 40 of the Natural Environment and Rural Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, in the exercise of their functions, to the purpose of conserving biodiversity.



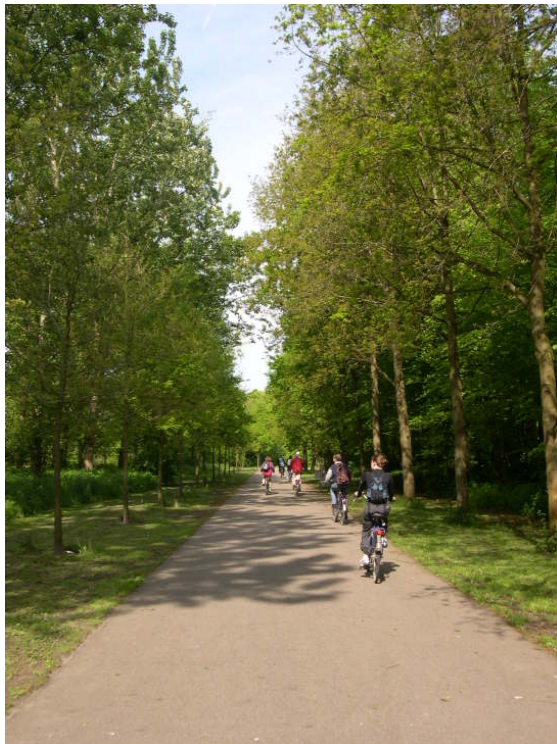
**53** This is carried through into the National Planning Policy Framework (NPPF) which is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is to contribute to conserving and enhancing the natural environment and reducing pollution.

**54** There are 12 core principles in the NPPF that should underpin both plan-making and decision-taking. Of these 12 core principles, the following relate to Natural Environment:

- *Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this framework*
- *Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value*
- *Promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production)*

**55** Section 11 of the NPPF, “conserving and enhancing the natural environment”, is also relevant to this topic paper, and the natural environment in particular. It demonstrates the Government’s commitment to sustainable development and the protection and enhancement of green infrastructure. In accordance with paragraph 109, the planning system should contribute to, and enhance, the natural and local environment by:





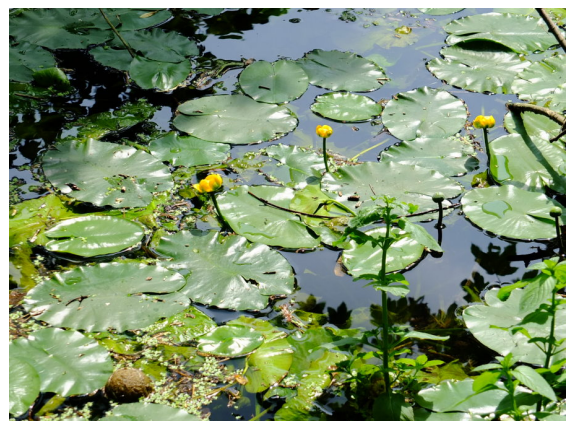
- *Protecting and enhancing valued landscapes, geological conservation interests and soils;*
- *Recognising the wider benefits of ecosystem services;*
- *Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.*
- *Preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability and*
- *Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

**56** Paragraph 110 sets out that, in preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the

local and natural environment. As such, plans should allocate land with the least environmental or amenity value. Paragraph 114 indicates that local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.

**57** Further, paragraph 117 states that to minimise the impacts of development on biodiversity and geodiversity, planning policies should:

- *Plan for biodiversity at a landscape-scale across local authority boundaries;*
- *Identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;*
- *Promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan.*



**58** Finally, paragraph 157 (fifth bullet) requires that Local Plans should contain a clear strategy for enhancing the natural environment.

**59** These paragraphs in the NPPF indicate the kinds of issues, related to the natural environment, that local planning authorities must address.

**60** In support of national policy, there are several reports and papers that provide further commentary on natural environment issues.

## **Making Space for Nature: A review of England's Wildlife Sites and Ecological Network**

**61** Sir John Lawton's report argues for a *"step-change in nature conservation"* creating a *"more resilient natural environment for the benefit of wildlife and ourselves"*. The report calls for establishing a coherent and resilient ecological network which will provide a range of high quality ecosystem services<sup>(8)</sup> which will help us both mitigate and adapt to climate change by e.g. storing carbon or improving the security of water supplies.

## **Understanding Nature's Value to Society - UK National Ecosystem Assessment**

**62** The National Ecosystem Assessment provides *"a comprehensive overview of the state of the natural environment in the UK and a new way of estimating our natural wealth"*. One of the key messages from the assessment was that as the UK's population continues to grow, and its demands and expectations continue to evolve, there is likely to be increased pressures on ecosystem services, and climate change will have an accelerating impact.



## **Natural Environment White Paper (NEWP) (2011)**

**63** The White Paper recognises the role of the planning system in the protection and improvement of the natural environment. Many wildlife habitats are lost or deteriorated due to changes in land use. Fragmentation of natural environments and green infrastructure is also a key concern, which can impact on our resilience to climate and demographic change.

**64** The NEWP, influenced by the Lawton's review, makes a case for ecological networks as an effective response to conserve wildlife in environments that have become fragmented by human activities. The White Paper also states that urban green infrastructure is *'one of the most effective tools available to us in managing environmental risks such as flooding and heat waves'* and promotes the inclusion of green spaces in all new developments.

**65** The NEWP also recommends that the *"government and society need to account better for the value of nature, particularly the services and resources it provides"*. This is a relevant and current issue and it has been recognised by some practitioners that a traditional Cost Benefit Analysis (CBA), which considers only financial flows was

<sup>8</sup> Ecosystem services are the benefits people obtain from ecosystems. These include provisioning services such as food and water; regulating services such as flood and disease control; cultural services such as spiritual, recreational, and cultural benefits; and supporting services, such as nutrient cycling, that maintain the conditions for life on Earth

# Natural Environment - Policy Background

ineffective at informing decisions around the management of long term environmental change or risks<sup>(9)</sup>

## Local

**66** Relevant to both Open Space and Natural Environment, the 2005 Local Plan contains strategic policies that aim at safeguarding intrinsic values of the open countryside including areas of attractive landscape (Policies S10 and S11)



**67** Relevant to the natural environment, the 2005 Local Plan contains the following policies:

- 'Nature Conservation Sites', Policy NE1 -to protect from development all designated sites of importance for nature conservation
- 'Protected Species', Policy NE2 - to help conserve those animal and plant species protected by the Wildlife and Countryside Act 1981.
- 'Biodiversity and Geological Enhancement', Policy NE3 - to achieve positive gains for biodiversity and geology in the design of new development.
- 'Conserving and Enhancing Landscape Character', Policy NE4 - to conserve the Borough's landscape.
- 'Areas of Attractive Landscape' Policy S11 - to protect and enhance those

areas of countryside identified as having county-wide landscape value. In Milton Keynes Borough these are: the Brickhills and the Ouse Valley, north and west of Newport Pagnell.

**68** The Core Strategy (2013) also contains guidance and policies on the importance of the natural environment. In addition to these which has already been referred to on page 7 of this paper the Core Strategy's Policy CS 19 includes six key steps that will be taken in order to maximise biodiversity:

1. protect and enhance the hierarchy of national, regional and local sites within the Borough as well as BAP Priority Habitats and species,
2. provide nationally designated sites and statutorily protected species with the highest level of protection,
3. ensure that damage to the biodiversity and geological resource of the Borough will be avoided wherever possible. Where unavoidable it will be minimised through mitigation or if mitigation is not possible, by compensation, by provision of replacement habitat of higher quality to achieve a net gain in biodiversity,
4. create and enhance habitats to help wildlife adapt to the impact of climate change,
5. seek opportunities for habitat protection, restoration and creation to meet the objectives of the UK and Bucks & Milton Keynes Biodiversity Action Plan and aims of the Biodiversity Opportunity Areas,
6. support biodiversity recording and monitoring, in particular the work of the Buckinghamshire and Milton Keynes Environmental Records Centre.

<sup>9</sup> For more details please see the Chartered Institution of Water and Environment Management website at <http://www.ciwem.org.uk/policy-and-international/policy-position-statements/placing-a-monetary-value-on-ecosystem-services.aspx>





**69** A paper by the Milton Keynes Parks Trust, entitled “Our Commitment to Biodiversity” (2010), recognises the importance of open space and the natural environment in Milton Keynes. The paper sets out the biodiversity policy for the Parks Trust and documents the measures being taken to enhance biodiversity with specific actions contained in a Biodiversity Action Plan.

## Natural Environment and Biodiversity - Issues

**70** There are a range of important wildlife habitats within the Milton Keynes area, as illustrated in Figure 7 (Drawings R10-11 of the Milton Keynes Green Infrastructure Plan). These include floodplain grazing in the Ouse and Tove valleys; woodland, particularly along Yardley Ridge and the Greensand Ridge; and heathland on the greensand ridge. Outside the 'City' of Milton Keynes these habitats are quite sparse and fragmented, and there are no internationally designated sites. However the rivers Ouse and Ouzel, to the north and east of the 'City' respectively, do provide for some linkage between habitats.



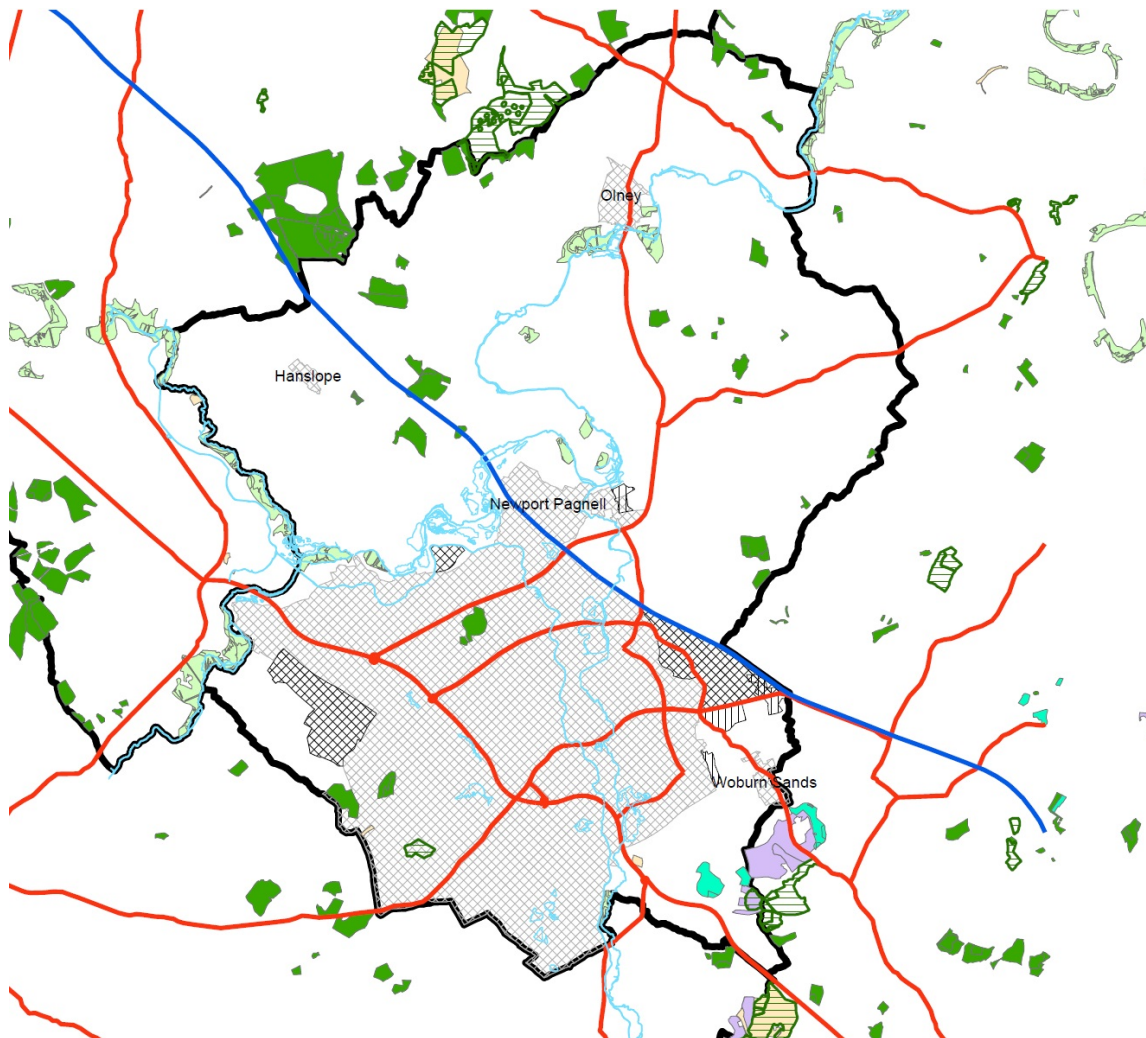
**71** It should be noted that "connectivity" is one of the guiding principles of the Milton Keynes GI Plan. The provision of improved linkage between existing and proposed GI resources is key to the successful development of the physical GI network on

the ground. This particularly applies to biodiversity corridors and habitats. The Plan recommends that existing corridors should be protected and enhanced and then also act as a focus for further improvements. Good linkages will allow biodiversity to move and spread between habitats, which can help to improve their ability to survive. The GI Plan identifies that a main task in the planning of a GI strategy is to identify gaps in the existing connections and to provide suitable linkages to counter the existing fragmented patterns.



**72** A report on Core and Local Output Indicators for Biodiversity in Milton Keynes (2012) produced by the Buckinghamshire and Milton Keynes Environmental Records Centre shows that of the three SSSIs wholly or partly within Milton Keynes, all currently meet Natural England's aim of bringing all SSSIs into Favourable or Unfavourable Recovering condition; in south-east England as a whole, 97.5% of SSSIs are currently meeting this target.

**Figure 7 National BAP Habitats in the Borough and adjacent to its boundaries**

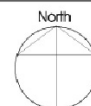


**Key**

- County/Unitary Authority Boundary
- Built Up Areas
- Expansion Areas
- Strategic Reserve
- Coastal and floodplain grazing marsh
- Lowland beech and yew woodland
- Lowland mixed deciduous woodland
- Lowland heathland
- Undetermined grassland
- Wet woodland
- Main Rivers, Canal and Waterbodies

Project	Milton Keynes Green Infrastructure Plan
Drawing	National BAP Habitats
Dwg No.	07012/R10A
Scale	1:100,000
Date	May 2007
Drawn	OB
Checked	RS

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Source: Milton Keynes Green Infrastructure Plan (2008). Credit: The Landscape Partnership



**73** It should be noted that SSSIs are monitored over a five - six year cycle, and thus this data cannot be used to provide annual monitoring figures, but the trends over time do provide a useful indicator of the quality of these protected sites.



**74** At a more local level, there are 18 locally designated wildlife corridors within the Borough, covering woodland, railway corridors, grid road corridors and wetland habitats. There is also a designated Local Nature Reserve within the 'City', the Blue Lagoon, which is located in the south west of the authority adjacent to the current edge of development near Bletchley. There are approximately 200 Local Wildlife Sites and 16 MK Wildlife Sites (and an additional 14 outside the boundary but nearby).

**75** At a sub-regional level the Buckinghamshire Green Infrastructure Strategy (2009) provides a strategic approach to the delivery of green infrastructure in Buckinghamshire and identifies a number of "Green Infrastructure Initiatives of Sub-Regional Significance." Of particular significance for Milton Keynes are:

- Grand Union Canal Environmental Enhancement and Restoration - a potential initiative that could enhance the landscape, waterscape, nature conservation resources and facilities for countryside recreation along the canal corridor. This initiative could include the potential restoration of

the disused Buckingham and Wendover arms of the canal.

- Whaddon Chase Initiative - the Chase is historically and ecologically significant and offers considerable potential for providing opportunities for green infrastructure whilst offering a "green buffer" to the proposed growth of Milton Keynes. Whaddon Chase is also recognised as a Biodiversity Opportunity Area.

**76** In 2013 the Buckinghamshire and Milton Keynes Natural Environment Partnership (NEP - formerly known as the Local Nature Partnership) published the Buckinghamshire Green Infrastructure Delivery Plan. This Plan has been developed to provide a series of project proposals the NEP could potentially take forward. One of the main purposes of the GI Delivery Plan was to build on and add value to existing high level work in the county GI Strategy and district GI Strategies where these have been undertaken.



**77** While none of these strategic projects cover Milton Keynes Borough, which has its own GI Plan, they may be relevant when considering developments with cross-boundary implications. This is also the case for the Luton and southern Bedfordshire Green Infrastructure Plan (2009).

**78** Directly relevant to Plan:MK is the Bedford Green Infrastructure Plan (2009) which lists the Bedford to Milton Keynes Waterway as a strategic green infrastructure project. The Bedford GI Plan notes that creating this Waterway will complete a missing link in the waterway network by linking the Grand Union Canal to the River Ouse. The Bedford to Milton Keynes canal project is part of the Eastern Green Infrastructure Action Area in the Milton Keynes GI Plan.

**79** In 2010 the Buckinghamshire and Milton Keynes Biodiversity Partnership undertook more detailed and accurate mapping of habitat types within Buckinghamshire and Milton Keynes<sup>(10)</sup>. The report includes four key findings for Milton Keynes administrative area

- Milton Keynes holds a diverse mix of habitats, including a high proportion of species-rich habitat. 49% of all reedbed habitat in the county is found here, the majority of which is located outside protected areas (88%). However, overall this is a scarce habitat type covering only 12ha.
- 23% of floodplain grazing marsh in the county is found here and is primarily associated with the River Ouse. The entire extent of this habitat falls outside protected areas.
- 120ha of lowland wood-pasture and parkland is located here and represents 23% of the total county

resource, none of which is covered by nature conservation designations.

- Generally, arable land accounts for the majority of land in rural Milton Keynes, second by improved grassland. Woodland cover is low; at less than 4% it is well below the county average of 9%.



**80** At the County scale, Biodiversity Opportunity Areas are being developed by the Buckinghamshire and Milton Keynes Biodiversity Partnership. These are target areas with the potential for landscape scale biodiversity projects. The boundaries of the areas were originally drawn up using Landscape Description Units and were subsequently amended where necessary. They include a focus on habitats that are valuable at the National/County scale and areas where projects or groups are currently active and landowners are known to be amenable. As shown earlier (Figure 3 'Biodiversity Opportunity Areas in Milton Keynes and North Buckinghamshire') the Opportunity Areas identified in or adjoining Milton Keynes include the following:

- Greensand Ridge
- Milton Keynes City Area
- Ouse Valley
- Ouzel Valley
- Whaddon Chase
- Yardley Chase

10 Buckinghamshire & Milton Keynes Habitat Mapping available at:  
[http://www.buckscc.gov.uk/media/131095/habitat\\_mapping\\_project.pdf](http://www.buckscc.gov.uk/media/131095/habitat_mapping_project.pdf)

**81** The Buckinghamshire and Milton Keynes Biodiversity Action Plan provides considerable detail on the habitat and species to be promoted within the two Authorities. For each Habitat and Species the BAP provides a commentary on the existing situation, objectives and targets for a 5 and 10 year period and proposed actions within a given timetable. It was originally produced in 2000 by the Bucks Nature Conservation Forum. The BAP was revised in 2009.

**82** It describes how the wildlife of Bucks & Milton Keynes is going to be enhanced and protected over a ten year period.

**83** The BAP is divided into sections called Habitat Action Plans - each one details a specific habitat that is found in the county.

**84** Each Habitat Action Plan contains Targets which are designed to contribute towards Targets in the UK Biodiversity Plan.

**85** The Milton Keynes Green Infrastructure Plan advocates that existing habitats and species should firstly be protected and surrounded by buffer habitats that have a lower protection status, and then the scope for wider enhancement and development considered. This approach should link with targets for species and habitats within the Buckinghamshire and Milton Keynes BAP and the developing guidance on Biodiversity Opportunity Mapping that has been produced by the Buckinghamshire and Milton Keynes Biodiversity Partnership.



**86** In line with the NPPF (para 117) Plan:MK should identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation. The Milton Keynes Green Infrastructure Plan and the Biodiversity Opportunity Mapping for the Buckinghamshire and MK (see Figure 3 'Biodiversity Opportunity Areas in Milton Keynes and North Buckinghamshire' and Figure 4 'Green Infrastructure Opportunity and Action Areas - MK GI Plan' in this Paper) identify areas that should be targeted for enhancement.

**87** One of the ways to enable that enhancement could be through biodiversity offsetting. Government set out proposals for biodiversity offsetting in a Green Paper consultation, Biodiversity Offsetting in England, published in September 2013<sup>(11)</sup>.

**88** Biodiversity offsetting is a proposed approach to compensate for habitats and species lost to development in one area, with the creation, enhancement or restoration of habitat in another. Under this system any negative impacts on the natural environment would then be compensated for, or 'offset' by developers.

11 This is available at: <https://www.gov.uk/biodiversity-offsetting>



**89** The Green Paper also sets out a prospective means of calculating biodiversity gains and losses for such a system using a metric to quantify the value of habitats – both those lost in the development and those gained through an offset – on the basis of distinctiveness, quality and area.



## Question 3

### Biodiversity Offsetting

- Would you agree that Biodiversity Offsetting could be an efficient and transparent way to ensure there is biodiversity gain through development?
- Would you like to see Biodiversity Offsetting becoming mandatory for developments above certain thresholds? If yes, what these thresholds should be?
- Should Plan:MK promote/prioritise biodiversity and green infrastructure improvement projects located within the broad areas identified in Figure 3 'Biodiversity Opportunity Areas in Milton Keynes and North Buckinghamshire' and Figure 5 'Major open spaces, 1970 Plan for Milton Keynes' of this paper? Should Plan:MK include a specific list of high priority projects that should benefit from planning gains or biodiversity offsetting?



**90** The NPPF recognises that planning policies should plan for biodiversity at a landscape-scale across local authority boundaries. Policy S11 of the 2005 Local Plan seeks to protect and enhance those areas of the countryside identified as having county-wide landscape value. However, this is not a criteria-based policy approach - something that is supported by the national planning policy. Bearing in mind the pressure for development in the Borough it would appear reasonable to identify the strategic landscape resources within the Borough through the completion of a landscape character assessment and then to prepare an appropriate local landscape designation policy based on the findings of the assessment which would give the strategic landscape areas a relatively greater degree of protection than the countryside as a whole.

**91** A recently commissioned piece of work will seek to finalise the Council's Draft Landscape Character Assessment and, in addition, include a landscape capacity study. This refreshed Assessment will assist Milton Keynes Council in developing the landscape and visual impact elements of its policy approach towards a broad range of developments. In particular, the landscape capacity study will assist us in appraising wind turbines and solar photovoltaic developments.

## Question 4

### Area Designation

Do you agree that in order to protect and enhance our landscape a criteria-based policy approach is more appropriate than an area designation? Do you think it will allow a more site specific appraisal of impact on a case by case basis?







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Plan: **MK**