

Response to Consultation MK Local plan

Policy CEA9 Biodiversity and habitats network

A > Development proposals that provide a higher.....

Development which provides a significantly higher than 10% net gain in biodiversity should be strongly supported. Higher than 10% suggests a gain of 10.1% would be strongly supported which is not the aim of the policy.

Will be subject to monitoring of any significant on site gains or off-site gains by the LPA , a corresponding fee will be charged to monitor the habitats to ensure the gains are met over the 30-year period are delivered.

B > Development proposals that provide...

All developments must provide biodiversity enhancement.

Built-in habitat features are structural elements integrated into developments or landscapes to provide essential resources (food, water, shelter, space) for wildlife, including bird/bat boxes, green roofs/walls (CEA2), rock features, ponds, and wildlife corridors (hedgehog highways), enhancing biodiversity in urban and rural settings by creating niches within man-made environments.

- Every house must have an appropriate built in feature, bird, bat feature or insect brick
- Every development to have appropriate feature, hedgehog “highways” and wildlife corridors, wildlife friendly planting, green roofs and reduced light pollution
- Bespoke measures will be required for apartments, industrial buildings and civic structures such as schools, libraries, hospitals, etc.

C > Development proposals should avoid...

Must follow the biodiversity and mitigation hierarchies and provide evidence this has been followed (detailed in full in later section). The mitigation hierarchy applies to all development proposals. The biodiversity gain hierarchy applies to all development subject to statutory biodiversity net gain.

D > New Proposed

Have regard to the Buckinghamshire and Milton Keynes Local Nature Recovery Strategy, the Buckingham and Milton Keynes Biological action Plan, UK National Biodiversity Strategy and Action Plan and other regional special strategies for biodiversity such as “Bee Lines”.

E > Sites outside of the scope of Statutory Biodiversity Net Gain

- Sites which fall outside of the scope of Statutory BNG (but do not meet the criteria of exempt as set out within The Biodiversity Gain Requirements (Exemptions) Regulations 2024) such as
 - retrospective planning permissions made under section 73A; and

- section 73 permissions where the original permission which the section 73 relates to was either granted before 12 February 2024 or the application for the original permission was made before 12 February 2024

should be required to provide robust evidence to demonstrate measurable net gains for biodiversity have / will be achieved. If the completed proposals comprise of 5 or more dwellings or non-residential floorspace in excess of 1,000 sq. m the most recent Statutory Metric Calculation Tool must be provided to demonstrate any loss or gain of biodiversity.

- The baseline ecology value must reflect the habitats present prior to commencement of works. If survey work prior to commencement has not been undertaken, a precautionary approach must be taken and the pre-development biodiversity value taken to be the highest biodiversity value of the habitat which is reasonably supported by any available evidence relating to it.

Policy CEA10 Protection and enhancement of the environment

General comment – significant space is given in paragraphs 318 – 321 to the Upper Nene Valley Gravel Pits SPA and Ramsar site, although only a tiny fraction of its 10km buffer zone is within MKCC area - to the NW of Ravenstone. The same level of consideration should be given to the string of lakes along the Ouse valley in Milton Keynes which, while not yet designated as a Ramsar site, are very likely have the same species potential. Additionally, the Green Sand Ridge (National Character Area 90) and the Yardley-Whittlewood Ridge (National character area 91) are significant contributors to both landscape and biodiversity enhancement and connectivity. These areas and the wider connectivity are under pressure from this plan.

A> Development proposals must protect and enhance...

Nature has intrinsic value and can be independent of humanity, existing for its own sake and not merely as a commodity for human use. It is also vital for humanity as it provides essential resources like clean air, water, food, raw materials, pharmaceuticals etc. It regulates the climate and is crucial for human physical and mental health. It supports our society and economy through services like pollination and natural disaster protection, and its biodiversity makes ecosystems resilient. **For many reasons nature is under severe pressure, this plan seeks to actively redress this decline in an MK context**

Local Nature Recovery Strategy (LNRS)

The planning authority must legally consider England's Local Nature Recovery Strategies (LNRS) when creating policies and making decisions, ensuring development supports nature recovery by integrating strategies for habitat restoration, biodiversity net gain, and environmental improvement into plans. These spatial plans, prepared by the designated authority; Buckinghamshire Council, under the Environment Act 2021, identify priority areas for action, guiding development to benefit nature, water, air, and community access to green spaces.

The plan should also consider the LNRS of adjacent authorities to ensure landscape scale recovery of nature, both limiting negative impacts and strengthening and connecting habitats across authorities.

Ecology

2010 "Making Space for Nature" report, led by Professor Sir John Lawton, advocating for England's ecological network to be more, bigger, better, and joined up to cope with climate change, focusing on larger, higher-quality, and better-connected wildlife sites and corridors. It's a foundational concept for UK nature recovery, urging improved habitat management, expansion, restoration, and connectivity for resilient wildlife landscapes.

- **More:** Establish new nature-rich sites and create more space for wildlife.
- **Bigger:** Increase the size of existing important habitats to make them more resilient and buffer them from pressures.
- **Better:** Improve the quality and management of current wildlife sites to ensure they are healthy and functional.
- **Joined-up:** Create physical corridors and "stepping stones" to connect fragmented sites, allowing species to move and populations to thrive

Nature based Solutions

The inclusion of nature has been an intrinsic consideration in the development of the city. Greening and nature-based solutions – the practice of introducing nature and vegetation into human environments – make the city healthier, more joyful and equitable. Crucially, in the face of a climate emergency, they also improve sustainability, biodiversity and resilience.

Mitigation

All development should clearly show the process that has been followed in the mitigation hierarchy throughout the development of proposals. An Ecological Appraisal or Ecological Impact Assessment (and Biodiversity Gain Plan where applicable) will need to be submitted which:

Demonstrates the hierarchy has been followed: Avoid, Minimise and Compensate. This may be demonstrated by:

- **Avoid:** Reference to existing species data, Local Nature Recovery Strategy, Defra MAGIC tool, Preliminary Ecological Appraisal.
- **Minimise:** Alternative layout proposals to minimise, reduce impact on habitats and biodiversity such as light pollution, retain key areas or features, sensitive landscape design e.g CIEEM BHNG Design Stage Report
- **Mitigate:** Enhance, extend and buffer important habitats. Replace lost habitats with new high value habitats where possible. Enhance ecological connectivity through the development into the wider landscape.

Establishes a common understanding of the existing habitat biodiversity baselines within the site.

- Accuracy within any plans and drawings on the biodiversity value that's to be achieved.
- Demonstration of a consideration of biodiversity impact throughout the development timeline.
- 'Measurable' net gains, together with a plan as to how to monitor and manage these gains for the next 30 years.

Policy CEA11 Urban greening, trees and woodland

1. Urban Forestry

Milton Keynes was designed based on the strength of its landscape and trees to give it structure and identity. This identity has continued to play a key role in how we want the city to look and feel providing a 'living in a city within forest' perception. Urban green space has many health benefits, new and existing development should provide 3-30-300 rule, every citizen should be able to:

- see at least three trees from their home,
- have 30 percent tree canopy cover in their neighbourhood
- not live more than 300 m away from the nearest park or green space.



Diversity.

The key to a healthy and resilient biodiversity is to ensure diversity in species and habitats.

Tree Planting: planting schemes should specify no more than twenty percent from one family, no more than ten percent from one genus and no more than five percent from one species (including cultivars). Exceptions may include community orchards or bespoke landscape schemes. BS8545:2014 is an important document in relation to tree planting; planting schemes should be in accordance with it.

Hedgerows: a key component in the landscape, both urban and rural they provide habitats and connectivity for a wide range of species. Hedgerows can be culturally significant features with some dating back over a thousand years. Additionally, they provide food, colour and interest for communities. Existing hedges should be retained and enhanced, they must remain part of the public open space to ensure they are retained, appropriately managed and of benefit to the wider community.

Biosecurity.

Biosecurity refers to a set of precautions that aim to prevent the introduction and spread of harmful organisms. Developers and others need to

- Source plants from suppliers that adhere to national standards, source British grown stock to avoid introduction of invasive non-native pests and disease
- Keep up to date with plants listed as invasive – schedule 9 species – Wildlife and countryside Act
- Ensure pests and diseases are not transported or spread across sites by following 'phytosanitary' measures.

Designing out pesticides and herbicides

All new development and regeneration of existing areas should adopt an Integrated Pest Management approach; as set out in MKCC policy, the core principles being:

- **Prevention:** Creating environments that are inhospitable to pests (e.g., proper sanitation, sealed containers, ideal plant locations).
- **Monitoring:** Regularly scouting for pests to detect problems early and assess pest levels.
- **Intervention (Least Toxic First):** Using a hierarchy of controls, starting with non-chemical methods.

Through good design the use of herbicides and pesticides is not required, thus minimising potential negative effects on humans and the wider biodiversity. This approach needs to be addressed at the earliest stage of the planning process and evidenced within a landscape maintenance and management Plan (LMMP)

Policy CEA3 Resilient design

References “Drought tolerant” species. Climate change direction is not fully understood. Plants that may be typically considered drought tolerant are less likely to thrive in wet, cold clay soils. Species need to be selected for a variety of different traits, a planting strategy should be site specific and biodiverse amongst other considerations such as planting method and after care.

Broad genetic diversity in planting schemes minimises the impacts resulting from species that struggle or fail and highlights the species that thrive in the prevailing local conditions.

The “right tree in the right place” approach should be undertaken to ensure that new trees can live to maturity without coming into conflict, via either canopy or root system, with their built surroundings. Retention of existing trees is always preferable to removal and replanting, they should always be considered and protected at the earliest stage. BS5837:2012 is an important document in this respect; tree retentions should be in accordance it.

These factors should be considered at the earliest possible point in planning, then communicated to and discussed with the appropriate individuals before finalising site layouts, setting out landscape designs and making detailed proposals feeding into the ongoing Landscape Management Plan (LMP).

Policy CEA8 Provision and protection of accessible open space

Should clearly state the preference of MKCC is that Public open space is managed by a democratically accountable body. Where a developer chooses not to do this, they must

demonstrate the community have active participation in the management and control of the open space they use and pay for.

The approach for the public open space must be agreed at an early stage in the planning process as it is likely to impact many other aspects of sustainable development include community health, Sustainable urban drainage, cycle and foot path connection and biodiversity.

There is little regard to the quality of the public open space that is or should be provided. Reference should be made the to the Play area action plan to ensure that play is designed for the whole community, similarity reference to Geen Flag and other quality bench marking.

Policy CEA14 Protecting and enhancing watercourses

This should include ponds – i.e. non suds – ponds are important aspect of heritage, biodiversity and human aesthetics. The water quality should aim to be high and thus supporting a different species assemblage as opposed to necessarily polluted systems such as SUDS.