



# **Wycombe District Local Plan and the Duty to Cooperate Report**

**March 2018**

**Appendix 3: Buckinghamshire Milton Keynes  
Natural Environment Partnership**



### **Appendix 3 – Buckinghamshire and Milton Keynes Natural Environment Partnership**

Discussions with BMKNEP have continued through 2018 to date around the soundness and effectiveness of Policy DM34 and the clarity of the requirements for a net gain in biodiversity. These discussions have concluded with a schedule of possible amendments to DM34 that the Council has no objection to and which BMKNEP have agreed would overcome their concerns on soundness, this policy text is included overleaf. Their other reservations as set out in their representation to the publication version of the plan are unaffected by this discussion. They have also subsequently confirmed that WDC have met the Duty as included in the email below:

**From:** Chris Williams [mailto: ]  
**Sent:** 23 March 2018 17:18  
**To:** Richard White <Richard.White@wycombe.gov.uk>  
**Cc:** Thomas, Nicola <nthomas@buckscc.gov.uk>  
**Subject:** Re: Wycombe Local Plan

I am happy with this and therefore content to agree the DtC  
Chris

On 23 Mar 2018, at 15:23, Richard White <[Richard.White@wycombe.gov.uk](mailto:Richard.White@wycombe.gov.uk)> wrote:

Dear both

I believe so.

Please see attached for a (hopefully) final ‘track changes and comments’ version together with a *clean copy* of the resulting text.

Our plan is that we can include this version with the Duty to Cooperate report with a comment along the lines:

Discussions with BMKNEP have continued through 2018 to date around the soundness and effectiveness of Policy DM34 and the clarity of the requirements for a net gain in biodiversity. These discussions have concluded with a schedule of possible amendments to DM34 that the Council has no objection to and which BMKNEP have agreed would overcome their concerns on soundness. (Their other reservations as set out in their representation to the publication version of the plan are unaffected by this discussion.)

On the basis that we include these comments and amendments in the DtC report we’re hopeful that we can also report your agreement that we have discharged the Duty to Cooperate with respect to BMKNEP.

Chris – If there’s anything you want to discuss can I suggest a conference call on Monday?

Have a good weekend.

Richard

## **Schedule of possible amendments to DM34**

### **DM34 – Delivering Green Infrastructure and Biodiversity in Development**

**6.137** Policy DM34 sets out our approach to achieving and maximising Green Infrastructure and enhancements to local biodiversity. Part 1 of the policy sets the overall purpose, with Part 2 setting out the approach to follow. Part 3 includes specific minimum requirements to be included as part of the overall package of GI required by Part 2. [This policy is designed to help achieve the aims of CP7, CP9 and CP10 and it should be applied in conjunction with DM11 to DM14 as necessary.](#)

#### **POLICY DM34 – DELIVERING GREEN INFRASTRUCTURE AND BIODIVERSITY IN DEVELOPMENT**

- 1. All development is required to protect and enhance [both biodiversity and green infrastructure features and networks both on and off site for the lifetime of the development.](#)**
- 2. Development [proposals](#) are required to evidence a thorough understanding of context through the preparation of a proportionate assessment of existing and planned green infrastructure and [biodiversity features and networks both on the site and in the locality, and demonstrate how:](#)**
  - a) Through physical alterations and a management plan [for the lifetime of the development:](#)**
    - i. Existing green infrastructure [and biodiversity assets](#) will be protected or maintained;**
    - ii. Opportunities to enhance existing and provide new green**

infrastructure and biodiversity assets will be maximised;

iii. Development will deliver long lasting measurable net gains in biodiversity.

iv. Where appropriate, a monitoring plan will be put in place to review delivery of i-iii.

b) The mitigation hierarchy has been applied by following a sequential approach to avoid, minimise, mitigate, and finally compensate (on then off site) for any harm to biodiversity. If significant harm cannot be avoided in this way, development will not be permitted.

3. In all cases, development is required as a minimum to:

a) Secure adequate buffers to valuable habitats;

b) Achieve a future canopy cover of at least 25% of the site area on sites outside of the town centres and 0.5HA or more;

c) Within town centres and on sites below 0.5HA development is required to maximise the opportunities available for canopy cover (including not only tree planting but also the use of green roofs and green walls);

d) Make provision for the long term management and maintenance of green infrastructure and biodiversity assets;

e) Protect trees to be retained through site layout and during construction.

6.138 This Policy refers to both biodiversity and Green Infrastructure. These are distinct concepts and policy objectives, but they relate to many of the same features of the environment. Green Infrastructure refers to all of the natural or semi-natural components of the environment at whatever scale, everything from the Chilterns escarpment to individual gardens or trees, whether carrying a formal designation or not. It includes land and water habitats (sometimes called blue infrastructure) essential for biodiversity, areas and features important to our appreciation of the landscape, and areas

created or managed for human enjoyment which bring us closer to nature, such as parks and cycle ways, and greenspaces. Green Infrastructure is hugely valuable – it provides us with multiple benefits from ecological to social and economic. These are known as “ecosystem services” and need protecting and enhancing. [Biodiversity refers to the diversity of species and habitats in the environment and biodiversity assets are those parts of the environment that contribute to biodiversity.](#)

- 6.139** DM34 acts as an umbrella over Policies DM11 - DM16 of the Delivery and Site Allocations Plan, which also address matters of Green Infrastructure. These policies identify designated and undesignated assets, which are to be taken into account in DM34. Assets will be accorded a weight proportionate to their importance. The evidence gathering may reveal other assets not identified in these policies, and these must also be taken into account.
- 6.140** The NPPF defines Green Infrastructure as “...a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities”. The NPPG expands on this and explains that: "Green infrastructure is not simply an alternative description for conventional open space. As a network it includes parks, open spaces, playing fields, woodlands, but also street trees, allotments and private gardens. It can also include streams, canals and other water bodies and features such as green roofs and walls."
- 6.141** Houses and gardens provide opportunities through provision of e.g. hedgerow boundaries, wildflower turf and garden walls; streets can incorporate trees, wildflower-rich verges and SuDS schemes including biodiversity; and spaces such as woodland, allotments or local play areas can be managed for wildlife with appropriate planting and a range of habitats. Layouts should be planned so that new and existing trees are not only a significant feature of open spaces but they are also incorporated into streets, gardens, parking courts and other publicly accessible areas. Trees must be given adequate space to allow for future growth of both roots and crown.
- 6.142** Wycombe District Council is an active member of the Buckinghamshire &

Milton Keynes Natural Environment Partnership (the NEP). The NEP is a Partnership bringing together a wide variety of individuals, businesses and organisations that have an interest in driving positive change in the local natural environment. Our NEP forms one of 49 Local Nature Partnerships (LNPs) in Britain, which work to highlight the importance of the natural environment and develop and ensure a more joined up approach through linking environmental objectives with social and economic goals.

**6.143** This Policy has been shaped by the NEP's 2016 Vision and Principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes. The key points of the NEP Vision for the whole of Buckinghamshire and Milton Keynes by 2030 are working together towards a landscape-scale network of green and blue infrastructure that is:

- Well-designed, accessible, used and valued by our residents
- Connected together at the landscape scale
- Wildlife-rich
- Recognised as a necessity into the long-term to provide benefits for sustainable growth
- Delivered - through support, commitment and adequate funding ensuring additional, bigger, better and more joined up and connected green and blue infrastructure to provide multiple benefits is a priority.

**6.144** The policy also complements existing Policies DM11 to DM14 in the Delivery and Site Allocations Plan, which should be read alongside this policy.

**6.145** Part 2 of the Policy sets out the essential principles to follow – understanding context, delivering improvements, and following a mitigation hierarchy. The Policy applies to all scales and types of development, but as with some of the other policies in this chapter, the Council will only require a proportionate approach. A proposal for a house extension, for example, will typically only require consideration of any existing trees affected by the proposal. A strategic housing proposal would consider a far wider and deeper assessment, including in some cases an Environmental Statement under the EIA regime.

- 6.146** In assessing net gains in biodiversity, a best practice methodology for biodiversity accounting is expected to be used [unless or until a local approach is set out in a future Supplementary Planning Document](#). Gains in other types of green infrastructure are likely to be measured both qualitatively and quantitatively.
- 6.147** Trees, woodlands and hedgerows are valuable assets which provide Environmental, Economic, Social and Climate Change benefits. They are an important element of green infrastructure, are of particular importance for what they add to landscape character in the District and are also exceptionally important for their role in making urban areas more sustainable places to live and work.
- 6.148** Wooded areas account for 18.8% of Wycombe District; this represents over 32,000ha of woodland. In both urban and rural areas woodlands play an important role in defining the Chilterns landscape and supporting Chilterns ecology, and, particularly in rural areas, in supporting the economy. Trees, woodlands and hedgerows also help to secure sustainable development, through air quality enhancement, storm water control, habitat provision and helping to reduce the rate of global warming by trapping carbon dioxide. They can also be used as a resource for both recreation and education, and, historically, influenced the development of the furniture industry in the District.
- 6.149** Incidental open spaces such as small landscaped areas within housing or commercial developments provide important visual contrasts, soften the hard edge of buildings, and provide space for biodiversity. They provide opportunities for soft landscaping, and generally contribute to amenity. Typically less than 0.1 hectares in area, they are generally too small to identify on the Policies Map, but their importance to amenity throughout the District's built environment is such that they should be protected.
- 6.150** Where existing trees are on or adjacent to a site and have significant amenity value the District Council may use its powers to protect the trees with Tree Preservation Orders (TPOs). Where trees on or adjacent to a site could be affected by development the District Council will expect planning

applications to follow the process set out in British Standard 5837:2012 Trees - in relation to design, demolition and construction (or subsequent revisions), with the use of buffers which exclude damaging activity or other suitable protective measures. The Council will require a tree survey and an Arboricultural Impact Assessment (AIA) to be submitted. Where special techniques and tree protection methods will be necessary for successful implementation, details of them must also be included in the form of a Tree Protection Plan (TPP) and Arboricultural Method Statement (AMS). Details of foundations, services and levels may also be required to enable a properly considered decision to be made on the impact of development on retained trees.

- 6.151** Part 3 of the Policy specifies a number of design solutions that are required as a minimum on relevant developments. The Council may publish a Supplementary Planning Document to provide further detailed guidance on the measures set out. Until this guidance is adopted developers should work with the Council's Natural Environment and Arboricultural Officers to agree the approach to their scheme.
- 6.152** Protected habitats are highly vulnerable to direct and indirect impacts from development and adequate buffers are necessary to ensure their continued protection. Some of these are already well established in national guidance or best practice (e.g. 10 metres for [most](#) streams or rivers, [a minimum of](#) 15 metres for [irreplaceable habitat, including](#) Ancient Woodland).
- 6.153** Canopy cover within urban areas provides a range of ecosystem services including biodiversity and climate change benefits such as increased habitat, increased rainwater control, and improved air quality. It also improves the quality, amenity value, and sense of place of an area. In most cases trees will be the optimum solution for increasing canopy cover, but alternatives such as green roofs and green walls will have an important role to play in more constrained sites, especially in town centre locations. Sufficient space above and below ground for trees and other plants to meet their potential must be provided.
- 6.154** Effective management and maintenance are essential to ensure that

biodiversity and green infrastructure benefits are long lasting. Specific requirements will be tailored by the Council according to the scale and complexity of the scheme.

**6.155** There is a strong link to Policy DM35 Placemaking and Design Quality. To accord with the objectives of DM35 the detailed design and specification of the hard and soft landscaping elements that make up the new or improved green infrastructure assets must be high quality and must be fully integrated with the overall placemaking approach.