

Appendix 3: Comments submitted on the The Local Plan for Buckinghamshire vision and objectives consultation

The Vision for 2040

The vision should recognise the need to protect biodiversity both within protected areas and across the county as well as protecting 'valued local landscapes' from harmful development. Especially statutorily protected sites such as Special Areas for Conservation, Sites of Special Scientific Interest and Local Wildlife Sites.

The UK Government's Environmental Improvement Plan (EIP23) published in January 2023 presents a strengthened 'biodiversity duty' for public authorities which includes that they must "Consider what you can do to conserve and enhance biodiversity". In addition, Buckinghamshire has an obligation regarding nature recovery and has made good progress as one of the pilot authorities which needs to be sustained into the future.

All legislation regarding Special Areas of Conservation must be adhered to and a Habitats Regulations Assessment of the local plan will be required to ensure that there is no harm to Burnham Beeches through implementing the local plan. Consideration should be made to the impacts of recreation pressure, air quality and hydrology. Previously, the City of London Corporation has worked closely with Natural England, the then South Bucks District Council (and subsequently Buckinghamshire Council) for many years to reduce the impact of development on the Burnham Beeches SAC and would wish to see the following documents arising from this collaboration rolled forward into the new plan with their obligations for developers remaining the same or enhanced.

- Development Management Guidance Note: hydrology in Burnham Beeches (February 2014)
- Burnham Beeches SAC strategic access management and monitoring strategy (SAMMS, adopted in 2020).
- The situation regarding air quality should also be reviewed.

Objective 1: Natural and built environment

The plan should recognise the need to protect important biodiversity areas as well as 'valued local landscapes' from harmful development and especially statutorily protected sites such as Special Areas for Conservation and Sites of Special Scientific Interest. If it were possible to further relieve the impacts of visitor pressure on Burnham Beeches through the development of an alternative green space for recreation such as a "gateway" which would also act as a buffer, this would be the best long-term solution and we would be happy to work with Buckinghamshire Council in order to help make this a reality.

Air pollution from development and transport is a significant harmful impact on important protected wildlife habitats including Burnham Beeches SAC.

The plan should recognise the impacts of air pollution and present a way forward to reduce these impacts over the life of the plan.

Objective 2 Mitigating / adapting to climate change

The plan should recognise the impact of development on the resilience of biodiversity to climate change. Directing growth to suitable locations must include consideration of the impact on protected species and habitats and especially those deemed vulnerable to climate change. This should be a material consideration along with 'connections and services' as outlined in point b

The nature recovery strategy should also include plans to continue to restore habitats where possible, to reduce their fragmentation and to provide buffers for nature reserves to increase the resilience of the landscape to climate change and to facilitate the movement of species to new areas of habitat where possible.

Objective3: Provision of homes

The plan should recognise the impact of housing on protected biodiversity sites and under C seek to 'ensure new housing is of high-quality design, low-carbon, and digitally enabled and in keeping with its surroundings and contributes to the protection of biodiversity and habitats. '

We continue to fully support the measures outlined in the Burnham Beeches SAC strategic access management and monitoring strategy (SAMMS, adopted in 2020), in particular the 500m zone around Burnham Beeches where there should be no new additional dwellings and the 500m-5.6km zone where developer contributions fund the SAMMS. As agreed in the supplementary planning document outlining the SAMMS we look forward to working with the council to review details of the projects and costs. Should the new local plan propose a large increase in the number of dwellings within 5.6km of the SAC the current SAMMS may not provide adequate mitigation and additional options may be needed and we would be happy to work with the council to discuss this further.

Local Transport Plan 5 (LTP5) vision and objectives

The Vision for 2040

The vision should recognise the need to conserve and enhance biodiversity in delivering the local transport plan and in particular the need ensure transport investment does not adversely impact protected biodiversity habitat and species.

The City of London Corporation has been pleased to work with Buckinghamshire County Council over many years on numerous transport infrastructure improvements that have been of considerable benefit to the Burnham Beeches Special Area of Conservation (SAC). Under the Conservation of Habitats and Species Regulations 2017 a Habitats Regulations Assessment of the local transport plan is necessary to ensure that the plan has no detrimental impact on the SAC.

Burnham Beeches is currently experiencing considerable damage from the transport infrastructure with the potential for this to worsen if the environmental needs of the SAC are not properly considered. For example, vehicles driving onto the edges of the nature reserve as they try to pass each other on the narrow roads. This is exacerbated each time the traffic on the A355 Farnham Common is slowed resulting in large numbers of vehicles using Egypt Lane/Hawthorn Lane to avoid the hold-up. Increased ownership of 4x4 vehicles and the number of delivery vans using this route further contributes to the problem. Further improvements through the Local Transport Plan should be carried out to benefit this internationally important biodiversity site (all of which have been discussed in previous LTPs) and should include:

Traffic management

- Reducing the speed limits on all the roads through Burnham Beeches to 30mph

- Introduction of traffic calming measures to restrict large vehicles and reduce the amount and speed of traffic on Egypt Lane and Park lane.
- Consider options for changing the road surface on Egypt Lane and Park Lane to reduce its desirability for traffic.

Traffic Route Design

- Consider the closure of Park Lane to motor vehicles and Egypt Lane to through traffic continuing the successful car free zone established at Burnham Beeches over the past 15 years
- Consider designating the road through Burnham Beeches as “quiet lanes” more in keeping with their status as country roads through a nature reserve.
- Explore the options for ensuring that satnavs direct vehicles on other routes rather than those through Burnham Beeches.
- Complete the M4, M40 and M25 motorway box with the upgrade of the A404 to dual carriageway along the whole length which would remove traffic from the A355 reducing the likelihood of vehicles impacting the SAC

Kerbing and Kerb Maintenance

- Extension of the kerbing programme further along Hawthorn Lane. Kerbing prevents the roads being widened each time they are resurfaced, which encroaches on the nature reserve. They should also prevent erosion/compaction of the edge of the SAC (see below)
- Sweeping the roads with previously installed kerbs each year to prevent build-up of organic matter reducing the efficacy of the kerbs. When effective the kerbs prevent vehicles from driving onto the edges of the nature reserve causing compaction and destruction of vegetation. (This action was agreed in a previous LTP but there has been no road sweeping in recent years).
- Maintenance of the previously installed kerbs to ensure they continue to be effective.
- Management of roadside drainage to reduce harmful run off to protected sites.

Under the current Local Transport Plan there are supposed to be parking restrictions coming into force on the roads through Burnham Beeches and nearby in Farnham Common (for example around Kingsway). We understand that these have all been agreed but we are still waiting for them to be implemented by the council. We would still support their implementation as one means of reducing harmful impacts on the SAC

Objective 1: Connecting our economy

Through “maximising investment into transport for the benefit of residents and local businesses” the objective does not acknowledge the substantial impact of the highway network on biodiversity and protected biodiversity sites, such as Burnham Beeches SAC through erosion, fragmentation and pollution.

Implementation of this objective should be undertaken recognising the authority’s duty under the Environmental Improvement Plan (EIP23) to conserve and enhance biodiversity. Delivery of transport projects should be undertaken ensuring biodiversity, and especially protected biodiversity sites such as Burnham Beeches SAC, are improved or at least not adversely impacted.

An additional action to, 'Ensure transport investment projects will conserve and enhance biodiversity' would reconcile the economic development need with the enhanced biodiversity duty of the authority.

Objective 3: Building places for people

Open and green spaces are recognised in the proposed Buckinghamshire Local Plan Vision Consultation as important for supporting active lifestyles and good physical and mental health. Additionally, highway investment has the potential to conserve and enhance biodiversity achieving benefits such as greater climate resilience of threatened biodiversity, better protected biodiversity sites, reducing fragmentation and generally healthier more robust ecosystems.

This objective should include an action to conserve and enhance biodiversity through investment in the transport network and ensure that protected biodiversity sites, such as Burnham Beeches SAC, are enhanced through the LTP's implementation. The latter could include actions such as:

- Providing alternative natural green spaces for local residents, to relieve the pressure on those that currently exist
- Investigating options for better public transport links between stations/housing areas and places of interest such as country parks, National Trust properties and public open spaces.
- Improving facilities for cyclists and walkers. Currently many of the roads through Burnham Beeches are perceived as too dangerous which encourages people to drive to the nature reserve.
- Directing non-essential traffic away from nature reserves.
- Working with other partners such as Natural England and City of London Corporation to produce a site nitrogen action plan (SNAP) to reduce nitrogen levels throughout Burnham Beeches and implement its recommendations.