



1 March 2021

Planning Policy Department
Buckinghamshire Council
By email: planningpolicyteam.bc@buckinghamshire.gov.uk

Dear Sir/Madam,

Buckinghamshire Council Consultation: Biodiversity Accounting SPD

We are writing in response to the above referenced consultation.

The Buckinghamshire branch of CPRE, The Countryside Charity, as a long standing charity, has a role to protect the countryside from developments that do not meet acceptable planning guidelines. With over 400 members, as well as 35 Parish and Town Council memberships, we speak for a significant portion of the residents of Buckinghamshire. We welcome this consultation and are pleased to submit our comments below.

1. Firstly, we welcome this initiative. We think these proposals have come a long way from early documents and plans/ proposals.
2. We support the mitigation hierarchy, as off-site net gain should be the last resort. But how will you monitor proportions against each area to demonstrate that off-site is a last option?
3. If there is a loss as a result of a development will this then be readdressed? For instance some years ago there was a much publicised incident in the centre of Milton Keynes where a tree was killed off because they accidentally cut off its water supply by developing around it.
4. What's the decision making process and how will this be monitored and reported on within the authority and be transparent to residents and partners?

Chair
Paula Buck

Registered charity
number 1163356
Company number 9186100



5. We support the accounting tool, which will be very useful. But how will you measure and re-address biodiversity loss that's impacted from a development because it is 'not known'? For example, we understand that, when the M1 was expanded near Milton Keynes, habitats of the dormouse were destroyed in Great Linford. We understand this unpredictable consequence of the development was not realised until after the works were done, hence our question about retrospective resolution.
6. Who is responsible for the information going into the accounting tool to measure the biodiversity? Is it a third party to avoid conflict of interest? Please clarify.
7. We are concerned to ensure that, where habitat compensation is required (whether onsite or elsewhere) that the replacement reflects the native and local habitat (eg: that a predominately hawthorn hedge is not replaced by privet, or oak trees are not replaced by pine). We think this should be stated somewhere. Perhaps this could be achieved by including some reference to indigenous habitat in the definition of distinctiveness.
8. We support the keeping of a register of the compensation sites and monitoring their progress over the 30 years' perpetuity period. But how will non-compliance be managed?
9. Is Biodiversity Financial Contribution separate to s106? Please clarify.

On the whole we support this SPD, but would seek to clarify a number of points as described above.

Yours sincerely

Chair
Paula Buck

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