



**The Civic Society For Milton Keynes**

# **MILTON KEYNES GREEN INFRASTRUCTURE STRATEGY**

**A Response to  
Milton Keynes Council's  
Consultation**

**February 2018**

## **INTRODUCTION**

Milton Keynes Forum is the Civic Society for Milton Keynes, with membership open to local residents, organisations and businesses. It has contributed to constructive thinking about the development of the Milton Keynes area for almost three decades and most recently to consultations on Plan: MK, MK Mobility Strategy/TP4, and the MK Open Space Assessment.

## **THE BRIEF FOR THE MK GREEN INFRASTRUCTURE STRATEGY 2018**

The Council's brief for the MK Green Infrastructure Strategy is not clear. This draft lacks clarity of purpose and largely provides dilute summaries of other documents without adding value or demonstrating specific interactions between them. As it has numerous editing shortcomings we assume that it is an early draft, so look forward to seeing a more finished draft on which we hope we would find more of substance. However, the Introduction explains that it: will:

- Replace the 'Milton Keynes Green Infrastructure Strategy 2008';
- "Build on the foundations laid buy (*sic*) the Buckinghamshire & Milton Keynes Local Nature Partnership's vision and principles for Green Infrastructure" (NB it is actually called an Environment Partnership rather than a Nature Partnership);
- "... set out the Borough's approach to green infrastructure delivery through the local development, Plan: MK to 2031, and beyond."

We do not think it achieves these objectives. Unfortunately, the 'Milton Keynes Green Infrastructure Strategy 2008' does not appear to be accessible online anymore, so we have been unable to compare that with this 2018 version.

## **INTER-RELATING ASPECTS OF GREEN INFRASTRUCTURE**

We suggest that what is needed is a single document that examines the synergies and tensions between the many different purposes to which 'green infrastructure' is put, and which provides solid data on each aspect in relation to existing development and the planning of new development. It should be a document that addresses:

- landscape visual character;
- parklands and open spaces for public access and recreational uses;
- footpaths and bridleways;
- biodiversity and types of habitat in specific relation to landscape-scale connectivity;
- how and where 'green and blue' infrastructure is used for flood management and how this can be further developed strategically;
- river corridors;
- other aspects of 'natural capital'; and
- how all of this interacts with agriculture, horticulture and managed woodlands.

## **LANDSCAPE CHARACTER, URBAN AND RURAL**

There are significant gaps that existing documents do not fill and which a GI Strategy for MK needs to fill. For example, the Council commissioned a Landscape Character Assessment, which was published in 2016 (and a separate one relating to wind turbines and solar PV) which covers only the part of the borough outside the MK urban area, despite Natural England advice making clear that protection of landscapes within urban areas is also of importance. So a landscape character assessment is needed of the very extensive landscapes within and along the edges of the MK urban area. This needs to address, not only the protection of the visual qualities of the urban countryside and landscapes, but also protection of these landscapes from inappropriate visual encroachment on their edges, relating to the form, height and scale of developments next to the landscapes. For example this could have enabled better assessment of the new MK Council Waste Treatment site with its tall chimney prominently

intruding on the landscapes of the Great Ouse Valley and far beyond, as well as nearby Listed Buildings.

## **WATER AND FLOOD PREVENTION**

The Council has also commissioned studies of water and flooding in connection with preparation of Plan:MK:

- 'Milton Keynes Council Surface Water Management Plan' April 2016
- 'Milton Keynes Water Cycle Study' November 2017.

The MK Surface Water Management Plan is a substantial document with location-specific proposals to address future flood risk. This relates directly to GI and to changes to aspects of open space and landscape, so needs to be integrated with the new Milton Keynes Green Infrastructure Strategy.

## **BIODIVERSITY AT A LANDSCAPE SCALE**

It appears that, for biodiversity, this GI Strategy relies entirely on the Buckinghamshire Biodiversity Partnership's document 'Biodiversity & Planning in Buckinghamshire' published in 2014, and the Buckinghamshire Local Nature Partnership's Vision and Principles for Green Infrastructure, published in 2017. We would expect there also to be reference to existing Biodiversity Action Plans:

- 'Forward to 2020: Buckinghamshire and Milton Keynes Biodiversity Action Plan' (Buckinghamshire & MK Natural Environmental Partnership, undated) [<http://www.bucksmknep.co.uk/wp-content/uploads/2014/11/Bucks-BAP-Forward-to-2020.pdf>]
- The Parks Trust's Biodiversity Action Plan 2017-2022 [<http://www.theparkstrust.com/downloads/final-biodiversity-action-plan-2017.pdf>]
- And any comparable BAP from Milton Keynes Council.

## **SPECIFIC COMMENTS**

### **1. Section 2: Green Space Planning in Milton Keynes - A Brief History**

There are many aspects of this text that are unclear or inaccurate (eg the tree nursery was in Milton Keynes Village, not Newlands). We would be pleased to meet with the consultant to explain these to them.

### **2. Section 3: The Current GI Network**

#### **a. Parks - Linear Parks**

*"The feel of the corridors change across the city, more formal in urban areas and more agricultural on the periphery ..."*. The character of the linear parks do vary, but significant agricultural areas are well within the urban area, not *"on the periphery"* for example much of the Ouzel Valley which is extensively used for grazing cattle and sheep.

#### **b. Country Parks / District Parks.**

The same confusion occurs in this report as in MK Council's recent 'Open Space Assessment'. The one Country Park within Milton Keynes Borough is Emberton Park. Milton Keynes Development Corporation developed nine District Parks within the 'city' all of which were transferred to Milton Keynes Council. These include parkland at: Great Linford, Tattenhoe, Emerson Valley, Kent's Hill, etc. These are not designed to *"attract visitors from a wide catchment, typically further than 10 kilometres"*. Each was intended to serve one of the many districts within the 'city', which comprised several adjacent grid-squares of housing.

#### **c. Grassland.**

There are also more than 50 paddocks within the 'city' mostly connected to a network

of Bridleways and horse-riding paths throughout the 'city'. These paths enable events like The Pony Club's national programme of Ride Out events to take place from Campbell Park, with up to 100 horses on a single day using the rides throughout the 'city' and out into the surrounding countryside.

d. Waterways / water bodies.

Two issues are confused together. Linford Lakes (*not Lindford*) were formed by mineral extraction but is not an active part of the storm water management system. Willen Lake is used for active flood control, but so also is Caldecotte Lake. Other balancing lakes provide flood control, such as: Furzton Lake, Lodge Lake and Tongwell Lake. More lakes were also constructed within the city such as: Walton Lake and Mount Farm Lake. There also a large number of ponds, many of which were constructed by the Development Corporation; others as SuDS for more recent developments.

e. Figure 3 lacks a key.

f. Designations.

There are no National Nature Reserves in Milton Keynes.

We are not aware of specific "*historic parkland*" at Emberton Park, but there are historic parklands at places such as: Gayhurst Manor and Tyringham Hall.

g. The map of Biodiversity Opportunity Areas (BOA) lacks a title and a key. It needs to be made clear that all of the MK urban area is a BOA as well as the river corridors.

3. **Section 4: Making the case for GI**

Paragraph commencing with "*Population growth ...*": It is wide of the mark to say in relation to Milton Keynes that "*Land-use changes due to development did not consider the 'impact on the extent and ability of green infrastructure to provide ecosystem services such as space for recreation, the mitigation of flooding events and air quality regulation'.*". The linear parks were planned to provide these and other GI services (though that terminology was not used then).

4. **Section 7: Neighbouring Strategies**

These examples of green infrastructure studies at a landscape scale from all the neighbouring local authorities show some of the kinds of GI strategic thinking that should be in the MK GI Strategy, but isn't.

In the Aylesbury Vale section: Tattenhoe not "*Tatternhoe*".

5. **Section 8: Key Issues for Green Infrastructure in Milton Keynes**

a. *8.3. Enhancing biodiversity: Meeting the need*

*"Establish strategic management and renewal of the urban green infrastructure, particularly along the grid roads, with the strategic objective of improving biodiversity by prioritising native species and active thinning and understory management"*. This seems to be based on misunderstandings. Much of the grid-road corridor landscape is of native species. Strategic management of these have been progressing for decades and a major programme of active thinning and understory management has been in progress for many years.

b. *8.7. Long term management of assets.*

*"... there needs to be a long term strategy for actively managing the borough's green infrastructure."* The Parks Trust has and implements long-term strategies and plans for management of its landscapes. For example, there are management plans for all three of its Ancient Woodlands which extend for many decades ahead. There are also detailed, site specific plans for management of all the landscapes that The Parks Trust owns. It is not clear what else this sentence is proposing.

*Long term management of assets: Meeting the need*

We welcome the statements about developers working with the Council and The Parks Trust to identify green infrastructure needs and design "*as well as enabling the long*

*term management of the green spaces to be taken over by The Parks Trust as part of developer contributions”.*

c. *8.8. Economic sustainability: Meeting the need*

Mountain biking would be popular in Milton Keynes, but it doubtful whether this would be compatible with the SSSI status of Howe Park Wood, for instance, and the other three Ancient woodlands within the ‘city’ are similarly sensitive because of their importance for both biodiversity and quiet recreation, as are others in the rural areas such as Little Linford Wood. Fortunately, some paths in the Brickhill woodlands and Bedford Estates woodlands provide some biking opportunities, with the advantage of more hilly topography.

*“Promoting local produce”.* The crop of Cricket-bat Willows from the linear parks are used to produce cricket bats; and small roundwood from woodlands and plantations is sold as firewood; and cider apples in the Woughton orchards are used for cider production. The cattle and sheep grazing within the city are managed for agricultural purposes. In general multi-purpose use of linear parklands make them more suitable for these uses than for arable crop production. However the many allotments throughout the ‘city’ are used for food production.

6. **Section 9: Strategic Green Infrastructure Priorities.**

a. *9.2. Connect missing links*

*“West - Green Infrastructure along the western flank of the city is currently fragmented. There is potential to improve the links ...”.*

This would be an important strategy, though it should also be about protecting and enhancing the western flank of the urban area from south to north along the alignment of the former drovers road which the North Bucks Way follows. This also applies to paragraph 9.4. Preparing for longer term growth.

b. *9.4. Preparing for longer term growth*

4 and 5 are noted as TBC, indicating that some words are missing

6. ‘Great River Ouse’ is more usually described as the River Great Ouse.

8. Yardley Chase. Because much of this land has no rights of way and a sizeable part of it remains under military ownership it is well-protected and of significant importance for biodiversity, including areas of SSSI, and has historic pasture woodland with many veteran and Ancient Trees.

7. **Section 10: Next Steps**

Missing wording - paragraph noted as “TBC”