



our commitment
to biodiversity



The Parks Trust

Our commitment to Biodiversity

Introduction

Our vision is to create an inspirational environment and a key part of this is to maximize the biodiversity of our parks and green spaces. In this document we set out our biodiversity policy on pages 9 and 10. Before that, we explain in general terms what it is we are seeking to achieve, the concept of biodiversity, the various habitats we have and the broad measures we are taking to enhance biodiversity.

The specific actions we are taking to promote biodiversity on our land are contained in our Biodiversity Action Plan which is available separately.

A wealth of wildlife

Butterflies, great crested newts, noctule bats and badgers are just some of the interesting wildlife that thrive in our parks and green spaces. Kingfishers, daubenton's bats and the occasional otter can also be seen in and around our waterways, while barn owls glide gracefully across the grasslands and hobbies can sometimes be spotted darting across the landscape hunting for prey.

The Parks Trust is privileged to be the custodian of abundance of animal, insect and plant life. We are the independent charity that cares for most of the parks, green spaces and roadside landscaping in Milton Keynes – some 1,800 hectares (4,500 acres) in total representing 20 per cent of the city area.

The land in our care ranges from ancient woodlands and plantations, valley pastures and hay meadows to rivers and streams, ponds, lakes and geological sites. The network of 'green corridors' along the roads, paths and valleys help to connect the parks and green spaces together, creating a rich mosaic of linked habitats that allows biodiversity to spread and flourish.



What is biodiversity?

Biodiversity' was defined by the 1992 Earth Summit in Rio as:

'The variability among living things from all sources, including terrestrial, marine and other aquatic ecosystems, and the ecological complexes of which they are a part; this includes diversity within species, between species and of ecosystems'

At a local level, biodiversity can be seen as part of the distinctive character of our landscape, reflecting local geology and hydrology, historical and current land use practices including agriculture, forestry and development.

Milton Keynes is characterised by river valleys with gravel deposits, giving way to clay with an old pastures and meadows, ponds, hedgerows and woodlands. More recent habitats include landscape plantations, gravel workings and large lakes together with modern sustainable urban drainage schemes providing valuable wetland habitats that reduce the risks of flooding.

All these habitats support a diverse range of species from those that are common, to species that are now considered rare and or endangered.

The Trust's vision is to maintain and enhance our green spaces and ensure they are enlivened by wildlife. In some places we create new habitats, in others the focus is on conserving and enhancing what is already there. We seek to achieve a healthy parkland environment that supports this diversity of wildlife that can be enjoyed and valued by present and future generations.

Through careful and sustainable stewardship, the Trust will maintain and enhance wildlife in the long term while also ensuring its parks can fulfil their other functions.

Green spaces that teem with life

Milton Keynes is famous for its green spaces – no-one who lives or works in the city is more than a short stroll from a park. Not only does the city have a high percentage of land set aside as green space with more being created every year as the city expands, it has much greater biodiversity than the surrounding hinterland. This biodiversity is largely dependent on the habitats in the greenspace managed by the Trust.



Some of the landscape in our care has changed little over the centuries, such as the semi-natural ancient woodlands at Linford, Shenley and Howe Park. Much is of more recent origin, having been created as part of the city's development over the past four decades.

These spaces are still maturing and developing – new species are continuing to colonise them, further enriching their biodiversity. As the city expands, so too will the green spaces providing opportunities for

wildlife and people.

Some areas are recognised for the national importance of their wildlife such as Howe Park Woods which is designated as a Site of Special Scientific Interest (SSSI), while others are designated as Local Wildlife Sites including Linford Wood, Shenley Wood, Walton Lake and Tattenhoe Park Meadow.

However, our aim is to ensure that *all* of the land in our care supports a rich variety of wildlife. As part of our ambition to be recognised as the leading managers of urban green spaces in the UK, we are constantly seeking out opportunities to enhance the biodiversity in our parks and green spaces.

For example, the creation of bare limestone surfaces at Stonepit Field has provided habitat for uncharacteristic plants of the area including kidney vetch which is the food plant of the small blue butterfly, a recent coloniser of the site. Gravel islands at Stony Stratford Nature Reserve provides important nesting habitat for breeding waders including lapwing, while artificial otter holts may account for the increasing number of otters being seen in the area.



Taking responsibility for our wildlife

Sowing wildflowers, digging ponds and scrapes, putting up nesting boxes for birds and bats, making otter holts and following ecological principles when managing our land, are just some of the ways we encourage biodiversity in our parks. We work closely with wildlife conservation experts to ensure that each habitat is managed proactively.



Some sites have detailed management plans in place to ensure that the needs of wildlife are given priority, with particular regard to protected sites and species, while other sites are managed by integrating ecological requirements with landscape management to ensure that we are delivering biodiversity enhancement throughout the estate.

Our work is informed by regular surveys and monitoring work and we have extensive evidence on which to base our management plans. A full list of all our survey data can be found on our website and with the Buckinghamshire and Milton Keynes

Biological Records office with which we share information.

We regularly undertake habitat maintenance and improvement work, for example cutting back scrub, coppicing woodland, maintaining and restoring hedgerows and clearing ponds of silt and debris.

Invasive and pest species including plant pathogens such as *Phytophthora*, Japanese knotweed, New Zealand pigmy weed, mink, signal crayfish, grey squirrels, rabbits and deer remain a threat to the parks' biodiversity, impacting on many habitats and species. Where necessary, carefully considered programmes of control are carried out to reduce or minimise the damage to wildlife.

Much of this vital work is carried out by our landscape contractors, funded by income from our properties on the estate and our investment portfolio. Our dedicated team of volunteers also undertake a significant amount of our biodiversity work and this enables us to achieve a great deal more. The Trust is fortunate to have almost 200 volunteers who generously give their time in a variety of ways, such as undertaking wildlife surveys and monitoring, patrolling the parks, helping with events and taking part in practical conservation tasks such as coppicing, hedge-laying and clearing scrub.



Habitat types

There are four main categories of habitat in our care –grassland, aquatic, hedgerows and scrub, and woodlands, which all have their own distinct biodiversity and management requirements. The following table shows the approximate area of each habitat type belonging to the Trust and how these correspond to the habitat types identified in the UK Biodiversity Action Plan and, where relevant that corresponding National Vegetation Classification.

Habitat	Area (ha)	Example UK BAP Habitat Types	Example notable NVC types
Grassland <i>Grass</i> <i>Paddocks</i> <i>Agriculture</i>	404 37 301	Lowland meadow	MG4, MG5 and U1
Aquatic <i>Ditches</i> <i>Rivers</i> <i>Lakes</i> <i>Ponds</i> <i>SUDS</i> <i>Marshland</i>	4 3 139 8 0.75 0.13	Reedbeds Rivers and ponds Eutrophic standing waters Shingle islands Sand martin and kingfisher banks Otter holts	S4/S24
Woodland and Scrub Plantation (shrubs) Woodland Grass and scrub	38 267 16	Lowland mixed deciduous Woodlands Traditional orchards	W8,W21, W22. W23 (planted), W24
Hedgerows	36	Boundary and linear features hedgerows	

Grassland habitats

There are two broad types of grassland in Milton Keynes: agricultural pastures and amenity grasslands.

The agricultural pastures (Lowland meadow UK BAP habitat) are mainly located in the Ouse and Ouzel river valleys and are grazed by the Trust's own sheep and cattle. Typically described as previously 'agriculturally improved pasture' these are now managed as extensive grasslands where the floral diversity is being enhanced by grazing management or hay cropping without fertilisers. There remain some important areas of species rich and unimproved grasslands and hay meadow including the Tattenhoe Park (MG4/5) and Brown's Wood Meadows (MG4), together with areas of acid grassland at Shenley Toot (U1).



The amenity grasslands are not grazed but are mown to a variety of heights appropriate to their location. They form the basis of much of the land in the smaller parks, such as the Loughton, Caldecotte and Broughton Brook Parks, the canal broadwalk and Linford Manor Park and the city's grid roads. Opportunity has been taken to enhance many of these areas through wildflower seeding and careful management including hay cropping.

Aquatic habitats

The rivers and streams in the Parks Trust's care include stretches along the River Ouse, River Ouzel, and the Loughton, Broughton and Caldecotte Brooks.

Environment Agency monitoring indicates that the rivers have a generally "moderate" ecological quality and "good" chemical quality, however nitrate and phosphate levels remain high.

There are lake habitats in the river valley parks, including the Willen flood balancing lakes and Walton Lake and Lodge Lake which have important reed beds. Also important are the marsh habitats in Bancroft Park and Woolstones. There are 129 small ponds scattered throughout the estate, 43 of which are known to support breeding populations of great crested newts.

Modern sustainable drainage systems are increasingly being used in new developments. They provide improved control of waste water flows and can make a positive contribution to biodiversity with careful management by the Parks Trust.



A floodplain forest creation project is underway at an 80-acre site in the Great Ouse floodplain. This exciting initiative, the first of its kind in the UK, aims to remodel the landscape to create an area of floodplain forest, a rare and important type of habitat. It will include a mix of woodland, flowery meadows, pasture and reed beds set in a mosaic of small ponds, larger pools and water channels, to create a myriad of habitats for insect, amphibian, bird, fish and mammal species, notably otters and water voles.

Woodland habitats

The largest expanses of ancient woodlands are located at Howe Park Wood SSSI, Linford Wood and Shenley Wood - all are of high ecological importance. The grand old oak and crab apple trees support a great variety of bird and insect life. Butterflies to be seen here include the white admiral and two of the hairstreaks - the purple hairstreak and the black hairstreak, which is one of the UK's rarest species. The woodlands are a delight in spring and early summer, when the bluebells, wood anemones, celandines and primroses burst into flower.

There are substantial areas of more recently established woodland, much of which are along the main roads. These provide an important green corridor network and some have been enriched by direct seeding of woodland plant species.

There are several important naturally-occurring scrub habitats, such as those at the Hills and Hollows, Great Linford, and on Willen Island. An extensive area of mixed species scrub was planted within Elfield Nature Park in 2006. In addition, the more formally landscaped parks and



parkways contain extensive areas of shrub and ground cover planting which functions as ecologically-important scrub habitat for insects, breeding birds and small mammals.

Hedgerow habitats

Biodiversity-rich hedgerows can be found within the parks and farmland. These are important for numerous birds, including dunnocks, chiffchaffs, finches and such butterflies as the brimstone and green hairstreak.

Some of the parkland hedgerows are very old, dating back to pre and early enclosure boundaries, while the majority were planted during the main enclosure period of the eighteenth and nineteenth centuries.

We continue to manage and restore the hedges as part of the history, landscape and ecology of the parks.



Our Biodiversity Policy

1. The conservation of our biodiversity is an important part of The Parks Trust's vision. We aim to manage our land in ways that positively support and enhance biodiversity. We seek to achieve a positive improvement in biodiversity across our land over time.
2. We will ensure the objectives of biodiversity conservation are given high priority whilst also maintaining a sensitive balance with recreational, amenity and landscape needs across our green estate.
3. While the Parks Trust, as an independent charity, is not a public body, it manages land for the benefit of the public and in doing so we accept the duties placed upon public bodies through Section 40 of the Natural Environment and Communities Act 2006 *to have regard, so far as is consistent with the proper exercise of its functions, to the purpose of conserving biodiversity*. We apply an ecological¹ approach to site management and development, working to the principles of the England Biodiversity Strategy².
4. We aim to maintain wildlife within the context of sustainable land use, rather than as an isolated activity, so that wildlife can flourish as part of a comprehensive approach to land use. We adopt a flexible approach, making modifications to our practices as necessary, for example to take account of changes in protected species legislation or where we want to enhance an existing habitat or create a new one.
5. Based on a thorough understanding of our estate and with well trained and experienced staff, we will make informed decisions about the long term management of our land. We will provide appropriate training and/or guidance on biodiversity management and conservation to our staff, contractors and volunteers.
6. We will comply with current legislation, published guidance and best practice principles paying particular attention to the needs of species and sites protected under UK and international legislation and those of Principle Importance for Biodiversity³ in order to maintain and enhance their populations.
7. We will support and directly contribute to the delivery of local and national Biodiversity Action Plan targets. We will produce a Biodiversity Action Plan for our parks and green spaces which will be regularly reviewed and amended.
8. We will work with partners and stakeholders to identify and realise strategic opportunities to increase the diversity and value of parks and green spaces to wildlife.
9. This will include the strategic creation and enhancement of habitat networks that will improve connections for wildlife within and beyond the city, so helping biodiversity adapt to a changing climate.
10. We will ensure that contract specifications and management plans are regularly reviewed and take account of wildlife potential and opportunities, even where conservation of biodiversity is not one of the primary objectives.

¹ Ecology is the scientific study of the distribution, abundance and dynamics of organisms, their interactions with other organisms and with their physical environment. Ecological principles arise from understanding and supporting the ecological functions that sustain biodiversity.

² Working with the grain of nature. A biodiversity strategy for England. DEFRA 2002

³ The Natural Environment and Rural Communities (NERC) Act came into force on 1st Oct 2006. Section 41 (S41) of the Act requires the Secretary of State to publish a list of habitats and species which are of principal importance for the conservation of biodiversity in England. There are currently 943 species of principal importance in England which have been identified as requiring action under the UK BAP.

11. We will ensure that full habitat and species compensation is provided in those circumstances where development is permitted in the Trust's green estate where this has been identified as having an adverse impact on biodiversity.
12. We will ensure that the agricultural land in our estate meets the requirements of good agricultural practice including Protecting our Water, Soil and Air: A Code of Good Agricultural Practice for farmers, growers and land managers. DEFRA 2009.
13. We will avoid pollution of soils, groundwater and watercourses, and damage to soil structure.
14. We will seek to minimise the impact of invasive species and pests by control or removal where possible.
15. We will improve the effectiveness of our wildlife conservation by learning from our experiences, providing training and increased awareness, through maintaining partnerships with local and national environmental organisations, and sharing best practices with others.
16. We will encourage effective communication between colleagues and departments of the Parks Trust, together with our partners and local communities, to foster awareness of the wealth of biodiversity on the estate and identify strategic opportunities for wildlife enhancement.
17. We will promote and interpret the biodiversity of the parks to the public and foster community involvement in nature conservation in order to develop understanding, enjoyment and wise use of the parks.
18. We will make systematic use of biological records and maintain a programme of ecological surveys and the monitoring of key indicator groups and habitats to aid informed decision-making about our land and to provide material for the Trust's education and external programmes.

Appendix 1: Summary of Habitats and Protected Species Legislation

1. The following information is a simplified summary of the legislation and the full text of the Wildlife & Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2010 and other legislation together with current published guidelines should be consulted.

Protected species of animal:

2. The Conservation of Habitats and Species Regulations 2010 implements the EC Directive 92/43/EEC in the United Kingdom and it is an offence, with certain exceptions, to:
 - deliberately capture, injure or kill a wild animal of a European protected species;
 - deliberately disturb any such animal, including in particular any disturbance which is likely to impair their ability to survive, breed or reproduce, rear or nurture their young; or to hibernate or migrate; or which affects significantly the local distribution or abundance of the species.
 - deliberately take or destroy the eggs of such an animal.
 - damage or destroy a breeding site or resting place of such an animal.
 - Possess, control, transport, sell or exchange, or offer for sale or exchange, any live or dead wild animal of a European protected species, or any part of, or anything derived from such a wild animal.
3. European Protected Species in the Milton Keynes area include bats (all species), otter and great crested newts. This does not discount other species being encountered, but represents a list of those species most commonly encountered.
 - The Wildlife and Countryside Act 1981 (as amended) makes it illegal to:
 - intentionally or recklessly kill, injure or take any wild animal included in Schedule 5 of the Act;
 - intentionally or recklessly damage, destroy, or obstruct access to any place that such an animal uses for shelter or protection, or to disturb such an animal whilst occupying such a place;
 - possess or control any such animal live or dead, or any part of, or anything derived from such a wild animal.
4. In order for otherwise illegal acts to proceed lawfully, an appropriate licence must be sought under the Conservation of Habitats and Species Regulations. Licences for the purpose of development are currently determined by Natural England and must include an appropriate mitigation and monitoring scheme to secure the “favourable conservation status” of the species in the local area.
5. **Water voles** are fully protected under Section 9 of the Wildlife & Countryside Act 1981 (as amended). It is an offence to:

- intentionally kill, injure or take (capture) a water vole;
 - possess or control a live or dead water vole, or any part of a water vole;
 - intentionally or recklessly damage, destroy or obstruct access to any structure or place which water voles use for shelter or protection or disturb water voles while they are using such a place;
 - sell, offer for sale or advertise for live or dead water voles.
6. Licences are available from Natural England to allow activities that would otherwise be offences for:
- scientific or educational purposes;
 - the purpose of ringing or marking;
 - conserving wild animals or introducing them to particular areas;
 - preserving public health or public safety;
 - preventing the spread of disease;
 - preventing serious damage to any form of property or to fisheries.
7. There is no provision under the Wildlife & Countryside Act 1981 for licensing what would otherwise be offences for the purpose of development, maintenance or land management. Such activities must be covered by the defence in the Act that permits otherwise illegal actions if they are the incidental result of a lawful operation and could not reasonably be avoided.
8. **Common lizards and grass snakes** are protected under the Wildlife and Countryside Act 1981 (as amended). These species receive partial protection under Section 9(1) and section 9(5). It is offence to:
- Intentionally or recklessly kill or injure a grass snake or common lizard;
 - Sell, or attempt to sell, any part of the species, alive or dead.
9. **Wild birds** are protected under the Wildlife & Countryside Act 1981 (as amended). The degree of protection depends on the species and, in some cases, the time of year. The basic principle of the Act is that all wild birds, their nests and eggs are protected by law and some rarer species are afforded special protection. Wild birds are defined as those resident in or visitors to Great Britain, in a wild state.
10. Part 1: Section 1(1) of the Wildlife & Countryside Act 1981 states that it is an offence to intentionally or recklessly:

- kill, injure or take any bird;
 - take, damage or destroy the nest of any wild bird while that nest is in use or being built,
 - take or destroy an egg of any wild bird.
11. Part 1 (5) of the Act states that it is an offence liable to a special penalty to intentionally or recklessly:
- disturb any wild bird included in schedule 1 while it is building a nest or is in, on or near a nest containing eggs or young;
 - disturb the young of such a bird.
12. **Badgers** are protected under the Protection of Badgers Act 1992. It is an offence to:
- Wilfully kill, injure, take, possess, or cruelly ill-treat a badger, or to attempt to do so;
 - Interfere with a badger sett, including damaging, destroying or obstructing access to a sett;
 - Disturb a badger whilst it is occupying a sett.
13. Licences to be granted for certain purposes permitting work that would otherwise be illegal. The purposes for which licences can be granted are:
- Preventing serious damage to land, crops, poultry or any other form of property;
 - Any agricultural or forestry operations;
 - Any operation to maintain or improve any existing watercourse or drainage works, to construct new works required for the drainage of land;
 - Preventing the spread of disease;
 - Development;
 - Scientific or educational purposes, or conservation;
 - Preservation of ancient monuments or an archaeological investigation.

Planning

14. The local planning authority has the power to request information under Article 4 of the Town and Country (Planning Applications) Regulations 1988 (SI1988.1812) (S3) which covers general information for full applications.
15. Section 99 of ODPM Circular 06/2005 which accompanies Planning Policy Statement 9: Biodiversity and Geological Conservation (PPS9) states: It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.

The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in

mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and / or planning obligations, before permission is granted.'

16. Furthermore, local authorities have a duty to consider the three derogation 'tests' of the Habitats Directive; namely, that there is no satisfactory alternative; that there are imperative reasons of overriding public interest, including those of a social or economic nature or beneficial consequences for the environment; and that favourable conservation status of the species will be maintained. If any of these requirements is not met, the local authority should refuse planning permission regardless of any commitment to obtain a Natural England licence.
17. Therefore it is essential that the presence or otherwise of a protected species, the extent that they may be affected by the development and sufficient proposed mitigation and/or compensation measures are established before planning permission can be granted.

Hedgerows

18. Under the Hedgerows Regulations 1997 it is against the law to remove or destroy certain hedgerows without permission from the local planning authority (Milton Keynes Council), obtained (or refused) through a notification procedure.
19. The regulations apply to any hedge that is at least 20 metres in length, more than 30 years old and that meets certain criteria that classify it as 'important'. The importance criteria are set out in Schedule 1 of the Regulations. They are relatively complex and a hedgerow can be deemed as important if it has either biodiversity interest (for example recorded as containing protected or rare species or is diverse, containing more than a certain number of species per measure of length); or if it has historic importance (for example if it is an old boundary marker); or a combination of both.
20. There is no requirement for the planning authority to prepare and maintain a map of important hedgerows, nor do they have to give landowners advance notice that they have important hedgerows on their land. For this reason, and due to the complexity of the criteria that define 'importance', a precautionary approach should be taken if, for any reason, the Trust considers the removal of any section of hedgerow, especially if the length to be removed is greater than 20 metres and more than 30 years old.
21. Normal maintenance operations, such as cutting or laying, are exempt from the regulations - the regulations are there to prevent the permanent removal of 'important' hedges. Coppicing of a hedge would be permissible, provided it was allowed to re-grow, but it would be wise to advise the planning authority if such action was planned on a hedgerow that may be considered as important.

Sites of Special Scientific Interest

22. Sites of Special Scientific Interest (SSSI) are defined areas of wildlife habitat (or they can be geological features) that are protected by law (the Wildlife and Countryside Act 1981, as

amended by the Countryside and Rights of Way Act 2000) in order to protect their special interest. They are notified by Natural England, which is required to provide the landowners and occupiers with notices containing citations explaining the special interest.

23. The Parks Trust owns one SSSI – Howe Park Wood. The only other SSSI in Milton Keynes is Oxley Mead, currently owned by a housing developer but about which the Trust has provided advice and expressed an interest in taking on.
24. The law requires landowners (or anyone) not to carry out any operations that will harm or degrade the special features of interest, unless the operations have been consented by Natural England. These are defined as Potentially Damaging Operations (PDOs) and each SSSI has a list of PDOs notified to the landowner/occupier by Natural England. PDOs can include operations on site, including normal management operations such as woodland coppicing or thinning, or operations off the site (for example earthworks carried on outside an SSSI that affect its hydrology/groundwater).
25. Generally Natural England prefer to take a proactive approach with landowners, agreeing positive management statements or management plans which then allow (and encourage) operations (PDOs) that conserve or improve the ‘favourable status’ of the SSSI without the need to apply to Natural England every time. This is also the Parks Trust’s preferred approach of working with Natural England to conserve the special status of the SSSI under its custodianship. However, any operations not included within the agreed management plan or regime will need specific consent from Natural England before they are carried out, otherwise a prosecution could result if the operation was deemed to have damaged the special interest.
26. The legislation to protect SSSI’s also applies to third parties. For example if a person was to fly-tip materials into Howe Park Wood which caused damage to its biodiversity interest, Natural England could prosecute that person for the damage caused to the SSSI.