

**SOUTH NORTHAMPTONSHIRE COUNCIL
MEMORANDUM**

To: Daniel Callis – Principal Planning Officer
(Development Management)

From: Paul Evans – Ecology Officer
(Enforcement – Development Management)

Date: 13th November 2018

Ref: S/2017/2577/EIA, Proposal Outline application for a residential development of up to 525 dwellings, open space, children's play area and associated infrastructure (Application accompanied by an Environmental Statement), Land North of Newport Pagnell Road Hackleton – Ecology Comments

Further to my consultation response on 22nd January 2018 an Environmental Statement Addendum Chapter 7 Ecology dated June 2018 and associated documents have been submitted. Having reviewed the above documents I have the following comments.

The level and scope of surveys that have been undertaken to inform the impact assessment are on the whole sufficient and the methods used follow best practice. The Environmental Statement follows the relevant industry specific (CIEEM) guidance and assessment methodology.

Upper Nene Valley Gravel Pits SPA/Ramsar

As Natural England are the “competent authority” in respect to the SPA I would be supportive of the comments and recommendations that are made by them in relation to SPA mitigation measures and other SPA matters made regarding this application.

I note from the latest response by Natural England on 08/08/18 that there overall position remains a holding response while issues outlined in there response are resolved.

Minimising Impacts on and Providing Net Gains in Biodiversity

The proposals will still result in a significant loss of circa 11ha of semi-improved grassland (circa 8.5ha when mitigation taken into account), the grassland being lost from the southern half of the site is identified as meeting criteria for local wildlife site designation and although the grassland is described as poor due to the historical nature of man made influences on site this still constitutes a large net loss in habitat resulting in an adverse effect at a local level.

Loss of the grassland will also result in loss of skylark breeding habitat resulting in an adverse effect at a local level.

The Environmental Statement concludes that;

7.5.174 Residual Effects “Although far smaller in extent, the proposed new habitat mosaic will be more species-rich and more-structurally diverse than the existing habitat at the Site, thereby providing elevated opportunities for biodiversity. As such, subject to the production and implementation of a long term Management Plan, no significant adverse effects are predicted.”

However the significant loss of semi-improve grassland habitat remains. Paragraph 170d) of the National Planning Policy Framework details that the planning system should contribute to and

enhance the natural and local environment by “...minimising impacts on biodiversity and providing net gains in biodiversity”.

The Environmental Statement concludes that;

Biodiversity Off-setting

7.5.227 It is acknowledged that there will be a net loss of semi-improved grassland at the Site. However, with the suite of ecological enhancements proposed at the Site including orchard creation, reedbed creation (see below) and improvements/extension to Brackmills Small Wood PWS, as well as the off-site enhancements to Brackmills Country Park, it is concluded that, overall, there will be no net loss to biodiversity. On the contrary, given the extensive habitat enhancement and creation proposed both on- and off-site, development at the Site is anticipated to achieve a net gain in biodiversity.

Policy S10j of the West Northamptonshire Joint Core Strategy identifies in policy S10 Sustainable Development Principles that “development will: j) promote the creation of green infrastructure networks, enhance biodiversity and reduce fragmentation of habitats.” Given the loss of habitat that the proposal would result in, particularly the loss of semi-improved grassland, and the level of proposed mitigation, it is unclear how the development will reduce fragmentation of habitats in line with this policy.

Hedgerows

The retention of the majority of hedgerows on site is welcomed.

Habitat Management Plan

The production of a Habitat Management Plan (paragraph 7.5.165) to guide the establishment and management of retained habitats as part of the mitigation would be welcomed to ensure biodiversity is managed in favourable condition in the long term.

Advanced or early establishment of the green infrastructure and ecological mitigation would be welcomed. This would help aid the mitigation of impacts of the proposal on habitats and species, by providing alternative suitable habitat and connectivity to species displaced by the development to colonise/use as an alternative to those habitats that will be lost under the proposals.

It’s important that monitoring is embedded into this plan so that management can be adapted appropriately to ensure the habitats provide favourable conditions for the species being mitigated for.

The production of a Construction Environment Management Plan (CEMP) as outlined in paragraph 7.5.145 would be welcomed and would be a key document to mitigate the construction phase impacts of the proposals on habitats and species.

Cumulative Effects

My previous comments regarding the cumulative effects on the habitats and species within the County Park have been addressed within the Environmental Statement addendum, I have no further queries in respect to this matter.