

**SOUTH NORTHAMPTONSHIRE COUNCIL  
MEMORANDUM**

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

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

Date: 29<sup>th</sup> January 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**

Having reviewed the above detailed application and submitted documents, I have the following comments to make in respect to Chapter 7 Ecology and Nature Conservation of the Environmental Statement.

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

7.5.73 & 7.5.151 Through our consultations with Natural England we are aware that the mitigation proposed at the Brackmills Country Park in relation to the SPA are not yet agreed and Natural England have not yet commented on this to advise on whether the package is adequate to allow conclusion of no significant effect on the SPA.

The report relies heavily on the Brackmills Country Park and improvements to it to mitigate for the recreation pressures on the SPA of increased visitors resulting from the proposed development. There is however still potential for new residents to visit the SPA instead of the alternative provided by the Brackmills Country Park, I would therefore recommend that this could be mitigated by the development contributing to visitor management with the SPA. I'm aware through our consultations with Natural England that they will soon be commencing, in collaboration with Northampton Borough Council, on a package of works to improve visitor management within the SPA. Natural England and Northampton Borough Council could therefore be approached to see if the development can provide contributions to this package of works as part of mitigation for the development.

Grassland

Where grassland is to be lost as a minimum the same area should be replaced/created/translocated as part of the mitigation.

7.5.90 identifies that there will be a loss of circa 11ha of semi-improved grassland, the grassland 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 biodiversity 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.

7.5.164 identifies that 2.6ha of species rich wildflower grassland will be created as mitigation, therefore the development would result in a net loss of 8.4ha of semi-improved grassland. The mitigation proposed does therefore not appear to be sufficient to achieve no net loss of biodiversity as required by NPPF.

### 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

Section 7.7 of the Ecology Chapter of the Environmental Statement details the mitigation of the cumulative effects, here and also throughout the report there is a large reliance on the Brackmills Country Park to mitigate for the impacts arising from recreation pressure on the SPA and other habitats and designated sites locally. There is however no consideration as to whether the country park has sufficient capacity to accommodate the visitor rates that are being predicted and thereby mitigate the potential for visitors to visit the SPA by providing an alternative. The country park contains potential Local Wildlife Sites (PWS) and wildlife habitat which is likely to be effected by an increase in visitors and recreational pressure.

### Minimising Impacts on and Providing Net Gains in Biodiversity

Paragraph 109 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 where possible, contributing to the Government's commitment to halt the overall decline in biodiversity,....".

The Environmental Statement does not give an indication of whether the proposal would result in net loss, no net loss or net gain in Biodiversity. In line with the policies described above I would seek no net loss as a minimum and for proposals where possible to provide net gain in Biodiversity, seeking off site mitigation to achieve this where possible.

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 biodiversity 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 enhance biodiversity and reduce fragmentation of habitats in line with this policy.