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## BY EMAIL

Dear Nicky & Daniel,

**RE: 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**

Please find set out herein a response with regard to Paul Evan's Memorandum of 13 November 2018, following an initial response on 22 January 2018.

It is pleasing to read that *"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"*. Comments regarding the Nene Valley Gravel Pits Special Protection Areas (SPA) reflect those made by other consultees, namely Natural England, and that these matters have been, or are being, addressed.

With regard to *'Minimising Impacts on and Providing Net Gains in Biodiversity'* it is stated that *"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".

It is acknowledged that current biodiversity metrics available to quantify net loss/gain do not account for the connectivity or fragmentation of habitats (either pre- or post- development), although it is understood that future metric will resolve this. It is highlighted however that the vast majority of proposed landscaping will not be fragmented from the wider green infrastructure

network. Furthermore, landscaping and open space to the north of the Site reinforces connectivity east-west through Brackmills Country Park with an average 'corridor' width of 130m through Brackmills Small Wood increasing to 250m principally through woodland planting, grassland and a drainage basin. Additionally, off-site landscaping and management proposed within the Country Park evidently seeks to increase the quality and diversity of habitats, which is an important part of establishing a coherent green infrastructure network.

It is acknowledge that green infrastructure proposed within the southern parcel of land are at a smaller scale in respect of corridor widths, but that landscaping/open space provision remains in cohesive corridors along both the southern and northern boundaries, rather than becoming fragmented. Furthermore, the landscaping along Green Lane, complements proposed landscaping within the forthcoming Hardingstone Sustainable Urban Extension (SUE) scheme designs, which will ultimately strengthen this green infrastructure corridor.

With regard to semi-improved grassland specifically, despite its substantive extent within the southern portion of the Site, existing grassland is far from 'favourable condition' with high nutrient loads, extensive undesirable weed growth, frequent vehicle disturbance and no management, all of which is reflected in the biodiversity metric. Furthermore, the grassland is currently fragmented from key green infrastructure at Brackmills Country Park by arable fields. As such, the New wildflower grassland proposed within the Brackmills Country Park, although far smaller in extent, has been designed in respect of both creation and management to provide a species-rich habitat, reflective of underlying soil conditions (i.e. neutral) located in proximity to a wildlife pond and existing wooded habitat. Therefore, in combination with a mosaic of other habitats created across the scheme, this grassland establishment and management is anticipated to mitigate sufficiently for the loss of existing grassland habitat, as well increasing the cohesion and resilience of green infrastructure networks.

Based on the above therefore, the scheme and its off-site contributions, allow for compliance with both the spirit and wording of Policy S10j Sustainable Development Principles.

Yours sincerely,

A handwritten signature in black ink that reads "J Woollam". The signature is written in a cursive, slightly slanted style.

Jamie Woollam BSc (Hons) CEcol MCIEEM  
**Associate Ecologist**