

## Mike Burgess

---

**From:** Heather Webb <[REDACTED]>  
**Sent:** 13 November 2017 15:15  
**To:** Planning Policy  
**Subject:** Northampton Local Plan (Part 2) Sites Consultation Document  
**Attachments:** 171113 sites consultation comments.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir or Madam:

Attached please find my comments in response to your consultation on the Sites Consultation Document for the Northampton Local Plan Part 2. Please don't hesitate to get in touch with any questions.

Regards,  
Heather Webb MSc MCIEEM  
Principal Project Officer  
Planning Services  
Northamptonshire County Council  
One Angel Square  
4 Angel Street  
Northampton  
NN1 1ED

Tel: [REDACTED]

-----  
This email and any files transmitted with it are intended solely for the use of the individual or organisation to whom they are addressed. If you have received this email in error, please notify [customerservices@northamptonshire.gov.uk](mailto:customerservices@northamptonshire.gov.uk)

The information contained in this email and in your reply may be subject to disclosure under the Freedom of Information Act 2000 or other legislation and its confidentiality cannot be guaranteed.

This email has been checked for the presence of computer viruses.  
Northamptonshire County Council. <http://www.northamptonshire.gov.uk>

-----



## Northamptonshire County Council

Planning Policy  
Northampton Borough Council  
The Guildhall, St Giles Square  
Northampton  
NN1 1DE

Please ask for: Heather Webb  
Tel: [REDACTED]  
Our ref:  
Your ref:  
Date: 13 November 2017

Dear Sir or Madam:

### Re: Northampton Local Plan Part 2 Sites Consultation Document

I'm writing in response to your consultation on the suite of proposed sites for consideration for the Northampton Local Plan Part 2. Having reviewed the proposed sites in Appendix A I believe most of them are free from major ecological constraints or opportunities. I do however have some concerns and/or comments about a number of sites, as outlined below:

**LAA0508:** This site off Fishponds Road appears already to have been built on. Its position within a complex of Local Wildlife Sites (LWS) and Potential Wildlife Sites (PWS) offers it the potential to strengthen local green infrastructure networks through good landscape planning. This could reinforce the habitat network along Billing Brook to the west of the site, and through the network of ponds northeast to Lings Wood.

**LAA1100:** Most of this site is a PWS and is adjacent to Wootton Railway Embankment LWS. The LWS is designated for a rare lichen, although it also has relict acid grassland habitat which may be able to be restored. Residential development on this site would undoubtedly impact the LWS through recreational pressure. I would expect any applicant to work closely with the Wildlife Trust to a) identify the current ecological value and features of both the PWS and LWS and b) identify the best measures to mitigate and make the LWS more resilient to visitor pressure.

**LAA0204:** Residential development of this site would add to the increase in recreational pressure on the Brackmills woodland complex resulting from increased development in the area generally. Ideally applicants would work together to coordinate measures to mitigate the impacts and enhance the habitats' resilience to visitors.

Planning Services  
One Angel Square, 4 Angel Street  
Northampton  
NN1 1ED

w. [www.northamptonshire.gov.uk](http://www.northamptonshire.gov.uk)

t. [REDACTED]

f.

e. [REDACTED]



Northamptonshire  
County Council

**LAA0205:** This site lies within a complex of nature conservation sites, and includes part of the Moulton Park Grassland PWS. Due to its history and location there is a good possibility that the site contains reptiles in particular and good quality brownfield habitat. I would therefore expect any application to include ecological surveys for both reptiles and invertebrates especially, or site survey evidence as to why these are not required.

Inappropriate or poorly-designed development could destroy any potential to link the complex of sites at Bradlaugh Fields with the Moulton Park Grasslands. However were the site to be very well designed it has the potential to a) help mitigate impacts on the surrounding local sites and b) connect them via a robust green infrastructure (GI) network. GI design will be critical on this site.

**LA0590:** This site is Summerhouse Spinney PWS. Ecological surveys would need to be done pre-determination to identify the site's ecological value and how impacts to biodiversity on site would be avoided or mitigated.

**LA1098:** Similar to LAA0204 above, this is one site which would add to the cumulative recreational impact on the Brackmills woodland complex. The site's scale should allow it to provide mitigation while delivering complementary green infrastructure and open space.

**LAA1107:** This site is Wilson's Meadow PWS. Abington Old Millpond LWS lies adjacent and would no doubt be used for informal recreation. The LWS has wet soils which are particularly vulnerable to compaction (e.g. from walkers) and wetland vegetation which itself will be sensitive to changes in water quality or quantity. I would be quite concerned about development on this site as it could greatly compromise a key spot in the chain of statutory and non-statutory nature conservation sites along the Nene.

Any application would need to include a full suite of ecological surveys which must be done pre-determination. I would also advise any applicant to contact the Wildlife Trust to discuss the site and any mitigation options available.

**LAA1027:** I would be concerned about adding this many new dwellings so close to Dallington Brook Field LWS, which would most certainly be used for informal recreation. The LWS has wet soils which make its vegetation particularly susceptible to the effects of trampling. Were the site to be developed I would want to investigate the potential to create a GI linkage north to the existing and proposed habitats at Northampton North SUE.

**LAA1096:** This site is part of Old Dallington Tennis Courts LWS, which is designated for its woodland vegetation. Any application would require a data search and botanical survey of the grassland to demonstrate that it is not of LWS standard and that any development would not affect the rest of the LWS. Dallington Brook Field is located adjacent to the site to the north so mitigation might be required for the extra visitor pressure although this could possibly be done across the two LWS, and potentially with any development of LAA1027.

Any prospective applicants should be advised to contact the Wildlife Trust about developing in the LWS.

**LAA1041:** The site is adjacent to Bradlaugh Fields LWS so some mitigation might be required to address any increased recreational pressure on the site's calcareous grassland and other habitats.

**LAA0176, LAA0177:** It would need to be demonstrated that any development on these sites would not impact Duston Mill Meadow or Storton's Pits.

**LAA0594:** Residential development of this site would likely require significant mitigation to ensure recreational pressure does not impact Storton's Pits and Duston Gravel Pit. Applicants should be advised to contact the Wildlife Trust.

**LAA1094:** Any development of this site should be designed in a way which continues to buffer – for example through garden and plot orientation – Billing Arbours LWS.

Finally, it must be noted that the sites in Appendix A include over 2000 new dwellings within 3km of the Upper Nene Valley Gravel Pits Special Protection Area (SPA). The Northampton section of the SPA (Unit 1) is the most heavily impacted of the entire wetland complex. Natural England has determined that a single visit to the SPA constitutes a potential likely significant impact, and a recent Footprint Ecology study has shown that most visits to the SPA originate from within 3km of the site. Natural England will therefore very likely require that the Borough Council prepare a mitigation strategy to illustrate how visitor impacts will be mitigated, bearing in mind that such mitigation must be in place before the impact takes place. I assisted with the preparation of the North Northamptonshire SPA mitigation strategy and will be happy to talk to the Borough Council if I can be of assistance.

Thank you very much for the opportunity to comment on this consultation. Please feel free to get in touch with any questions or should you require any more information. I can be reached via email at [REDACTED] or on [REDACTED].

Yours faithfully,

[REDACTED]

Heather Webb MSc MCIEEM  
Principal Project Officer, Planning Services