

Lucy Staves

From: Heather Webb <[REDACTED]>
Sent: 10 June 2016 13:53
To: Planning Policy
Subject: LPP2 Issues Consultation Paper
Attachments: 160610 NBC LPP2 issues comments.pdf

Dear Sir/Madam:

Attached please find my response to your consultation on the Issues Consultation Paper for the Northampton Local Plan (Part 2) and Partial Review of the Central Area Action Plan. Please don't hesitate to get in touch with any questions.

Regards,
Heather Webb MSc MCIEEM
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Please ask for: Heather Webb
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Our ref:
Your ref: Northampton Local (Part 2)
Issues Consultation
Date: 10 June 2016

Dear Sir or Madam:

Re: Northampton Local (Part 2) Plan Issues Consultation

I am writing in response to your consultation on the Issues Consultation Paper for the Northampton Local Plan (Part 2) and Partial Review of the Central Area Action Plan. My interest in this consultation relates primarily to biodiversity, open space and green infrastructure.

Question 13

I believe there is a need for the Local Plan (Part 2) (LPP2) to include a policy specific to biodiversity, largely related to the Upper Nene Valley Gravel Pits Special Protection Area (SPA). This is particularly important as Northampton Borough Council has not yet adopted the Upper Nene Valley Gravel Pits SPA Supplementary Planning Document, the consultation for which took place in 2015.

Located within Northampton, Unit 1 of the SPA is currently listed in favourable condition. However Natural England has assessed its condition risk as high, and describes the site as significantly affected by recreational disturbance, in particular dog walkers^{1,2}. A 2012/13 study of visitor and access patterns across the SPA showed very clearly that visit rates to the SPA tend to increase with proximity to residential areas. The study concluded that

¹ Natural England. 2016. Designated Sites View: Condition of SSSI Units for Site Upper Nene Valley Gravel Pits SSSI [ONLINE]. Available at [https://designatedsites.naturalengland.org.uk/ReportUnitCondition.aspx?SiteCode=S2000494&ReportTitle=Upper Nene Valley Gravel Pits SSSI](https://designatedsites.naturalengland.org.uk/ReportUnitCondition.aspx?SiteCode=S2000494&ReportTitle=Upper+Nene+Valley+Gravel+Pits+SSSI). Accessed 9 June 2016.

² Natural England. 2014. Site Improvement Plan: Upper Nene Valley Gravel Pits. Peterborough: Natural England, p. 4.

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residential development within 3km of the SPA would result in increased levels of access³, and potential disturbance to the site's qualifying features.

The recent Habitats Regulations Assessment for the North Northamptonshire Joint Core Strategy concluded that the plan would cause a likely significant effect on the SPA.⁴ In response Natural England required that a mitigation strategy be put in place or the plan would not be deemed sound.⁵ Mitigation strategies are becoming increasingly prescribed; it is possible that one would be required of the LPP2 should new housing allocations be made within 3km of the SPA, from where the greatest visitor pressure originates (see Figure 1 appended below).

Northampton has other significant biodiversity assets, for example the Duston wetlands and Dallington/Harlestone Heath areas. These would benefit from policy support to help preserve their ecological and amenity value.

Given the pressure on the town's biodiversity assets, the potential for a significant effect on the SPA and requirement for a mitigation strategy I believe the LPP2 should include a specific biodiversity policy.

Question 14

I suspect there are priority areas where green infrastructure (GI) networks could be enhanced or extended; it might not be apparent just yet where those areas are. Two factors which could be helpful in identifying such areas are Accessible Natural Greenspace and sustainable transport networks.

Overall Northampton Borough is well provided with Accessible Natural Greenspace (ANG) as defined by Natural England's Accessible Natural Greenspace Standard (ANGSt)⁶. There are areas however – particularly at the neighbourhood scale – where residents do not have access to sites within 300m of home (Figure 2 below). Northampton is so built up already and with so much development pressure creating new Accessible Natural Greenspace is likely not feasible. However it might be possible to add plantings to some amenity spaces to create a more natural feel, effectively transforming existing spaces into

³ Liley D, Floyd L, Cruickshanks K, Fearnley H, 2014. Visitor access study of the Upper Nene Valley Gravel Pits SPA. Footprint Ecology: unpublished report for the Nene Valley NIA Partnership. Available at: <http://www.nenevalleynia.org/wp-content/uploads/2014/08/Footprint-Ecology-Upper-Nene-Valley-Gravel-Pits-SPA-Visitor-Survey-screenres.pdf>. Accessed 7 June 2016.

⁴ URS. 2015. North Northamptonshire Joint Core Strategy Habitat Regulations Assessment. Report to the North Northamptonshire Joint Planning Unit. Basingstoke, Hampshire: URS.

⁵ Deeming R. 2015. Representation in response to the North Northamptonshire Joint Core Strategy Pre-submission Plan dated January 2015. Submitted on behalf of Natural England, Lincoln.

⁶ Natural England. 2010. 'Nature Nearby' – Accessible Natural Greenspace Standard. Peterborough: Natural England.

ANG. This would improve the biodiversity – and multifunctionality – of these sites while enhancing the local GI network for residents to enjoy.

Sustainable transport routes should also inform the location of any GI enhancements. Page 16 of the Issues Consultation Paper states that identifying cycling or footpath improvements is a key issue for the town's infrastructure. I would recommend that any sustainable transport studies make a point of identifying key cycle and pedestrian commuter routes to major employment areas like Brackmills and Sixfields. This would highlight where deficiencies might be discouraging residents from cycling or walking to work instead of driving. Cycling infrastructure in particular is often designed for recreational users who are happy to follow circuitous routes. Commuters require safe, simple, direct routes to their destination. Providing these would make a better contribution to achieving the desired modal shift.

Question 21

There are two additional issues which I believe should be addressed in the LPP2. The first of these is the saved policy L24 regarding allotments; this should be brought forward into the new plan. The county council very much supports allotment growing and is currently looking into ways to help communities create and use allotments. Allotment gardening helps increase food security, reduces food miles and associated carbon emissions, and provides a source of exercise and connection to the outdoors. Allotments can also be excellent reservoirs of important arable plants due to the low-intensity farming practices and disturbance regime. Allotment creation should be encouraged in large developments, and pressure to develop existing allotments should be resisted.

The second issue which should also be considered in the LPP2 is a borough-wide ecological network as outlined in paragraphs 109 and 117 of the National Planning Policy Framework. Ecological networks were first described by Professor Sir John Lawton in his review of England's wildlife sites⁷, and then in the Natural Environment White Paper⁸. Ecological network maps illustrate the hierarchy of wildlife sites, corridors and areas of activity, providing an overview of biodiversity assets. This office has developed draft ecological network maps for Northamptonshire and could likely assist with developing one for Northampton Borough.

Thank you very much for the opportunity to comment on the Issues Consultation Paper for the Northampton Local Plan Part 2. If you would like any information on or assistance with developing a mitigation strategy for the SPA, or an ecological map for the Borough please contact March Chant on 01604 366831 or at mchant@northamptonshire.gov.uk. If you

⁷ Lawton JH, Brotherton PNM, Brown VK, Elphick C, Fitter AH, Forshaw J, Haddow RW, Hilborne S, Leaf RN, Mace GM, Southgate MP, Sutherland WJ, Tew TE, Varley J, Wynne GR. 2009. Making Space for Nature: a review of England's wildlife sites and ecological network. Report to Defra.

⁸ HM Government. 2011. The Natural Choice: securing the value of nature. Norwich: TSO.

have any questions or would like any additional information please feel free to contact me on 01604 361210 or at hwebb@northamptonshire.gov.uk.

Yours sincerely,



Heather Webb MSc MCIEEM
Principal Project Officer, Planning Services

Figure 1 Origin of dog-walking visitors to Unit 1 of the Upper Nene Valley Gravel Pits Special Protection Area (orange; 3km zone outlined in red).

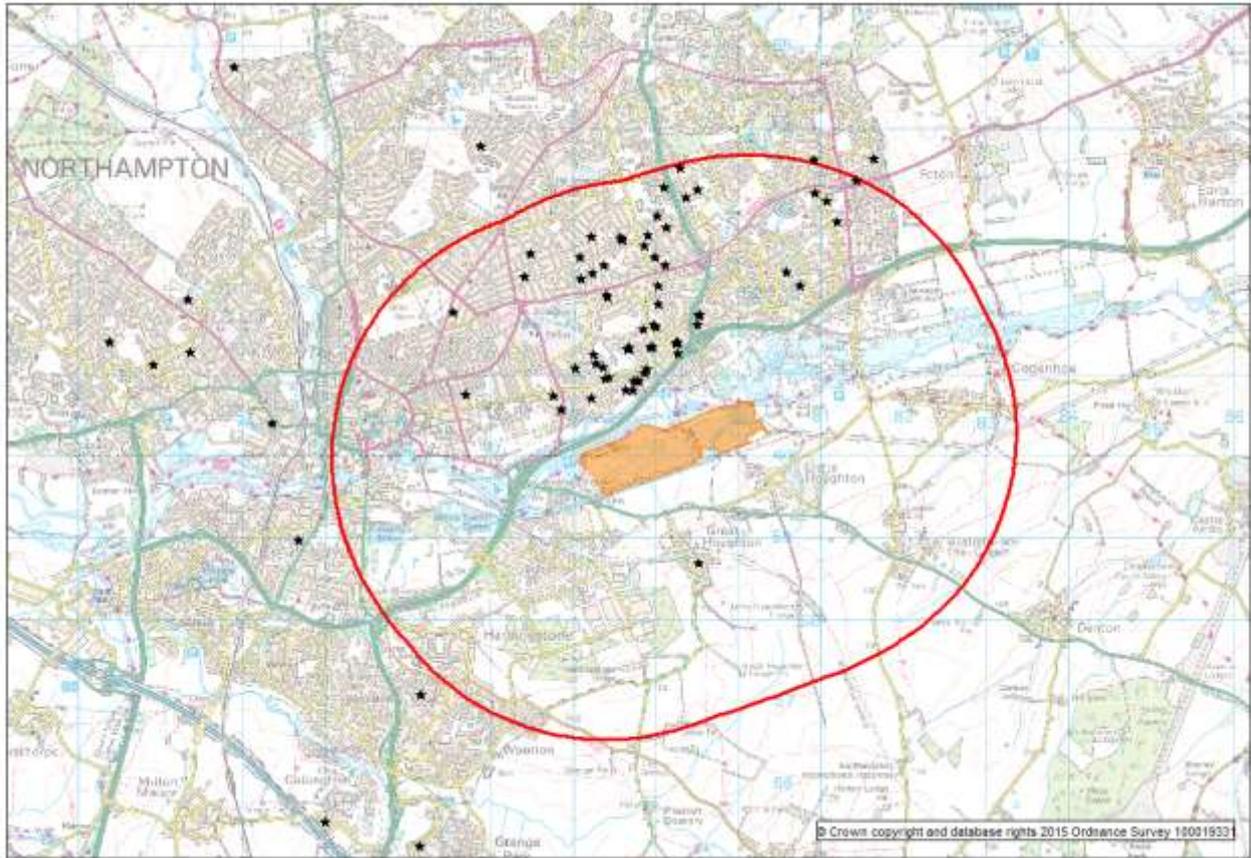


Figure 2 Current accessible natural greenspaces >2ha in Northampton, with 300m buffer (orange). The Nene Valley Nature Improvement Area is outlined in blue.

