

Lucy Staves

From: Cheese, Kayleigh (NE) <[REDACTED]>
Sent: 10 June 2016 13:21
To: Planning Policy
Subject: Consultation on Northampton Borough's Local Plan (Part 2) Issues Documents
Attachments: 184406 NE Response.pdf; 184406 NE Feedback Form.pdf

Dear Sir/Madam,

Consultation on Northampton Borough's Local Plan (Part 2) Issues Documents.

Please find Natural England's response in relation to the above mentioned consultation attached herewith.

Kind regards

Kayleigh Cheese
Planning Adviser
Northamptonshire Local Delivery Team
Essex, Herts, Beds, Cambs, Northants
Natural England
[REDACTED]
www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

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Natural England offers two chargeable services – The Discretionary Advice Service ([DAS](#)) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service ([PSS](#)) provides advice for protected species mitigation licence applications.

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Lucy Staves

From: Crewe LUP Hub (NE) <[REDACTED]>
Sent: 01 June 2016 11:49
To: Planning Policy
Subject: NE Response 184414 Northampton Borough Statement of Community Involvement
Attachments: NE Resopnse.pdf

For the attention of Claire Berry

Please find Natural England's response in relation to the above mentioned consultation attached herewith.

Regards,

Mrs Carla Wright
Natural England
Technical Services
Consultations Team
Hornbeam House
Crewe Business Park
Electra Way,
Crewe
Cheshire, CW1 6GJ

Tel: [REDACTED]

Email: [REDACTED]

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

From: Planning Policy [<mailto:planningpolicy@northampton.gov.uk>]

Sent: 25 April 2016 16:25

To: Consultations (NE)

Subject: Consultation on Northampton Borough's Local Plan (Part 2) Issues Documents and Statement of Community Involvement: 27 April - 10 June 2016

Consultation on Northampton Borough's Local Plan (Part 2) Issues Documents and Statement of Community Involvement: 27 April - 10 June 2016

The Plan is the long term strategy for what, where, when and how development will be managed in the Borough. The Northampton Local Plan (Part 2) will provide detailed planning policies and will identify areas for development as well as areas that should be protected from development. Once adopted, it will form part of the Development Plan for Northampton.

The preparation of the Northampton Local Plan (Part 2) will be accompanied by a partial review of the Central Area Action Plan to ensure it is up to date. We are also inviting comments on several related technical documents and an updated Statement of Community Involvement, which sets out how communities are consulted on planning applications and the Local Plan.

The Issues consultation is an opportunity for you to comment on key issues that you consider should be addressed in the Local Plan (Part 2) or in updating the Central Area Action Plan.

The consultation documents are now subject to public consultation for a six-week period from: **27 April to 10 June 2016 at 5.00pm.**

The consultation documents are available on the Council's website at:
<http://northampton.gov.uk/localplanissues>

The documents are also available for inspection during the consultation period at the following venues during normal opening hours:

The Guildhall One Stop Shop, Northampton
Borough Council
Abington Library
Duston Library
Far Cotton Library
Hunsbury Library
Kingsthorpe Library
Central Library
St James Library
Weston Favell Library
Wootton Library

Officers from the Planning Policy team will be available to answer questions about the consultation on the 18 May (between 12.30pm and 5.00pm) at the Guildhall.

Copies of the consultation documents will also be available to view at these locations:

Duston Community Centre Pendle Road, Duston, Northampton NN5 6DT	Monday – Friday: 9.30am – 12.30pm
Wootton Community and Sports Centre, Curtlee Hill, Wootton, Northampton NN4 6ED	Monday – Friday: 10.00am – 3.00pm

How to comment:

An online questionnaire is available on the Council's website at: <http://northampton.gov.uk/localplanissues>
This is the Council's preferred method for receiving representations.

You can also download a comments form from the website.

Copies of the questionnaire can be returned by post to:
Northampton Local Plan (Part 2) Issues Consultation,
Planning Policy,
Regeneration, Enterprise & Planning Directorate,
Northampton Borough Council, The Guildhall, St. Giles Square, Northampton NN1 1DE

or electronically to: planningpolicy@northampton.gov.uk

Please note all comments must be received by 5.00pm on Friday 10 June 2016.

If you no longer wish to be contacted regarding future Development Plan consultations or if you have any queries please contact the Planning Policy team using the contact details above.

Yours sincerely

Claire Berry
Planning Policy and Heritage Manager

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Date: 10 June 2016
Our ref: 184406
Your ref: Northampton Borough's Local Plan (Part 2)



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BY EMAIL ONLY

Dear Sir/Madam,

Planning consultation: Consultation on Northampton Borough's Local Plan (Part 2) Issues Documents

Thank you for your consultation on the above dated and received by Natural England on 25 April 2016.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We have only made comments to the questions relevant to Natural England's remit, as follows:

Question 13 – Is there a need for the Local Plan (Part 2) to include a locally specific policy to protect and enhance areas of biodiversity in addition to the policies in the NPPF and Joint Core Strategy?

Yes in relation to the Upper Nene Gravel Pits SPA. Although detailed consideration was given to this site in the development of the Joint Core Strategy new evidence has become available and our understanding of the threats facing the site has improved. Natural England advises there is a need for a locally specific policy, to ensure that increased recreational pressure at the SPA resulting from housing growth is addressed. Evidence suggests that new housing within 3km of the SPA is likely to cause increased recreational pressure contributing to disturbance and decline in bird species which form the SPA qualifying features. The Part 2 plan is likely to include new allocations within this zone of influence and may potentially promote development of windfall sites which could have an effect.

These issues will need to be fully assessed through the Habitats Regulations Assessment (HRA) supporting the plan and an approach to mitigation will need to be developed. For example it may be that a package of mitigation measures can be drawn up to counteract the impacts of new housing which could then be delivered through developer contributions, this is the approach currently being taken by authorities elsewhere in the county. Any commitments put forward as part of the Habitats Regulations Assessment to allow a conclusion of no adverse effect on site integrity would need to be included as part of a policy within the plan. If the HRA identifies the need for a Mitigation Strategy to be produced then the completion date for such a strategy should be at the adoption stage of the local plan. A commitment to such a deadline would also need to be included in the local plan policy or supporting text.

Question 14 - Do you think there are priority areas where green infrastructure networks could be enhanced or extended?

The Nene Valley Nature Improvement Area (NIA) could also be included as a local policy which identifies opportunities for delivering improvements to the NIA, through green infrastructure



provision along the River Nene corridor and beyond.

Paragraph 117 of the NPPF also states that consideration should be given to the types of development that are appropriate for inclusion in an NIA. Where housing allocations are proposed in the environs of a NIA opportunities to contribute to habitat enhancement should be explored. Planning positively for ecological networks will contribute towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in paragraph 114 of the NPPF

Question 18 – How do we ensure that new development preserves and enhances the character and appearance of the Borough and makes a positive contribution?

Your plan could refer to the National Character Areas which divide England into 159 natural areas, each defined by a unique combination of landscape, biodiversity, geodiversity and economic and cultural activity. The new NCA profiles provide an integrated, locally specific evidence base that can be used for making decisions about the natural environment. The NCAs highlight the significant opportunities in each area and therefore provide a useful planning tool that can help guide the design of projects so that they are appropriate to the locality and deliver the maximum benefits for the natural environment. Reference should be made to the National Character Areas, Northampton falls within: [NCA Profile: 89 Northamptonshire Vales](#) and [NCA Profile: 95 Northamptonshire Uplands](#).

Question 19 – Is there a need for the Local Plan (Part 2) to include a locally specific policy to promote measures within new development to address climate change and renewable energy in addition to the policies in the Joint Core Strategy?

Green roofs and walls can take advantage of under utilised urban spaces and provide multi-functional benefits through flood management, biodiversity, climate change mitigation and by managing the heat island effect. Green roofs have been shown to reduce ambient temperatures by reducing night time heat radiation, increasing albedo (reflectivity), shielding building materials from the sun and storing water in substrates which provides evapo-transpirative cooling.

Greening roofs in areas with a high proportion of buildings is an effective strategy to reduce surface temperatures. This can also help reduce the need for air-conditioning buildings in summer and can insulate them in winter. Green roofs also offer potential biodiversity benefits providing new habitat in areas which are currently lacking in wildlife habitat. They also create new links in a fragmented network of habitats, thereby facilitating movement and dispersal of wildlife.

The plan could also include a policy for the protection of soils. Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. For guidance on how adverse impacts on soils can be minimised please refer to Defra's [Good practice guide for handling soils](#) and [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#).

Sustainability Appraisal Scoping Report for Northampton Local Plan (Part 2)

Natural England is broadly satisfied with the proposed scope of the Sustainability Appraisal. We generally welcome the SA Objective to 'Protect and enhance Northampton's biodiversity and Geodiversity', however we are concerned by the presence of '?' in the 'Assessment Criteria'. Where elements of uncertainty exist Natural England would expect to see evidence that negative effects on important environmental assets can be avoided before sites and policies are committed to, in Local Plan documents. All relevant constraints should be clearly identified prior to assessment to allow informed decisions to be made.

We also disagree with the distance criteria used to determine negative effects on the Nene Valley Gravel Pits SPA. Current evidence suggests that recreational disturbance can have a significant

effect where developments are located up to 3Km from the site. The distance criteria used to determine significant effects therefore needs to reflect this.

Habitats Regulation Assessment

We note that a HRA will be undertaken for the local plan part 2 in due course, and reported on separately to the SA. Natural England agrees with this approach, given the level of detail required to assess potential impacts to the Upper Nene Valley Gravel Pits Special Protection Area.

Central Area Action Plan (CAAP)

Natural England currently has no comments to make on the CAAP.

Draft Methodology for Land Availability Assessment

We would wish to see the methodology changed to ensure sites are excluded which are partially or completely within a SSSI or European protected site. In other words any site which involves a direct land take should be excluded.

Under the stage 2 of the assessment process the assessment should also consider the presence of priority habitats as well as designated local wildlife sites.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Kayleigh Cheese on 02080 260981. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours faithfully

Miss Kayleigh Cheese
Northamptonshire Local Delivery Team

Date: 01 June 2016
Our ref: 184414
Your ref: Statement of Community Involvement



Claire Berry
Northampton Local Plan (Part 2) Issues Consultation
Planning Policy, Regeneration
Enterprise & Planning Directorate,
Northampton Borough Council
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BY EMAIL ONLY

Dear Claire Berry

Consultation on Statement of Community Involvement for Northampton Borough Council

Thank you for your consultation on the above dated 25 April 2016 which was received by Natural England on 25 April 2016.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications.

However, we have no specific comments to make on this consultation.

Yours sincerely

Mrs Carla Wright
Technical Services Consultations Team