Dear South Northamptonshire Council,

Hello there once again. Hope that you are all keeping well, and doing just fine too, at the present time.

Thank you very much indeed for inviting our organisation to submit comments in respect of the above current consultation exercise being undertaken by your Authority.

Therefore, please now note the following feedback, as expressed on behalf of The Wildlife Trust in Northamptonshire:

First-of-all, as a general point of comment, and applicable to all parts of this same current consultation exercise, but perhaps especially relevant for the content of the document entitled “Appendix 1: Policies and Allocations”, dated September 2018, and the whole suite of the, alphabetically-listed, towns / villages in the “Appendix 1: Settlement Confines” document, also dated September 2018 too, please be aware that in our opinion your Authority should be depicting in these contexts the entire range of site designation areas all the way from the highest level of the internationally designated / statutorily designated Special Protection Area in the Nene Valley, through UK national statutory designations such as SSSIs, and on down the the more local, county-level, non-statutory designations such as Local Wildlife Sites (LWS) and Local Geological Sites (LGS) too. At this end of the spectrum, we would also recommend that you include Protected Wildflower Verges (PWV), Pocket Parks and Potential Wildlife Sites (PWS) too. It is our feeling that at this, non-statutorily designated site, end of the overall range of types of existing designated site areas your analysis, and therefore your assessment of future potential constraints, is incomplete and, therefore, necessarily, limited.

(For instance, as an example of what we believe to be the above highlighted shortcomings in your overall future site evaluation process, please note that Employment Allocation Area Policy AL5 makes no reference at all (in either the relevant core text content or else the appropriate accompanying Map illustration) to the existing LWS designated area located within it.)

Furthermore, in a similar vein to the above comment referring to the entire spectrum of existing types of site designations, then please also note that, as an additional general point of comment, and applicable to all parts of this same current consultation exercise, but perhaps
especially relevant for the content of the document entitled “Appendix 1 : Policies and Allocations”, dated September 2018, and the whole suite of the, alphabetically-listed, towns / villages in the “Appendix 1 : Settlement Confines” document, also dated September 2018 too, please be aware that in our opinion your Authority should be depicting in these contexts the greater detail of the complete hierarchy of the three distinct types of existing designated Green Infrastructure ( GI ) Corridor routes. That is, the original, underpinning, Sub-Regional and Local GI Corridor routes as identified by the River Nene Regional Park, and also, of particular importance and significance in the South Northamptonshire area, the set of Disused Railway Line GI Corridor routes too as highlighted more recently by The Wildlife Trust themselves.

( Additionally, as an extension / expansion of the original high-level, ‘macro scale’, GI Corridor routes identification, if any more recent work has been done which identifies more contributions to the GI network at a finer level of detail, and on a more local and ‘micro scale’ of consideration - perhaps arising from sensitivity studies done at a more localised / specific settlement level of approach around the SNC District area - then this information should also be included in the same contexts as those already highlighted elsewhere here above. In a similar vein, all available information relating to the location, and potential connectivity, of Blue Infrastructure Corridors and networks should also be included in the relevant parts of this documentation, and represented spatially too. )

Next, for the content of the main / core document comprising the “Part 2 Local Plan” itself, dated September 2018, please note the following comments :

On Pages 91 and 92; for Section 9.4; sub-headed as “Local Green Spaces” : The Wildlife Trust would wish to take this further consultation opportunity to repeat some of the relevant comments here, that it has already expressed as a part of its previous response to SNC in relation to the earlier round of consultation contact undertaken in respect of the “Local Green Space : Technical Assessment”, Draft for Consultation, dated May 2018, to the effect that we just wanted to bring to your attention the fact that there already is a pre-existing National category of non-statutorily designated site referred to as Local Geological Sites ( LGS ). To our mind, therefore, there is, at least in theory, the possibility of some future confusion in respect of this geological classification of site areas and the Local Green Space designation process. So, you may wish to consider the benefit of highlighting and explaining this similar site designation scheme and the difference between the abbreviated term used to refer to them both.

With reference to the content of this same Section 9.4, please note that it is our view that your evaluation of any given Local Green Space site area should be giving greater weight to the Green Infrastructure ( GI ) actuality, and / or potential, in terms of their location in relation to
known GI / wildlife corridor routes and / or their future potential to act as ‘stepping-stones’ for establishing, contributing to, new GI local network connectivity.

As a general point of, under-pinning, principle, please note that The Wildlife Trust is generally very strongly supportive of, and we approve of, the whole concept and process of bringing forward, selecting and then finally designating a scheme of Local Green Spaces.

From the list of the 33 separate site location areas that have been considered for designation as Local Green Spaces, as shown on the proposals map, as listed in the Table given in Paragraph 9.4.3, we would wish to specifically highlight and bring to your attention the following two site locations.

Firstly, in respect of the site area called the Jubilee Field in Upper Boddington, to repeat and confirm the views of The Wildlife Trust concerning this particular site location, as previously expressed in writing in a letter sent to a representative of the, former, Jubilee Field Community Group during 2017, please note that it is our view that Jubilee Field has the real potential to provide a valuable habitat area for local wildlife in addition to its role in providing an important green space resource for local people too. This site area also has the real potential to become an addition to the county-wide network scheme of Pocket Parks too. Please be aware that, historically, this same site area has carried the categorisation of being a Potential Wildlife Site ( PWS ) area too.

Secondly, in respect of the site area called the Tove Wetland Pocket Park in Towcester, this is an extremely important and significant site location area in terms of its highly strategic context / setting in a Green Infrastructure ( GI ) sense. So, please be aware that this proposed Local Green Space site area is located inside both a Disused Railway Line GI Corridor Route, and also inside a major, strategic, Sub-Regional GI Corridor Route too. In addition, it’s Local Green Space boundary extent is located ‘between’, near to, the ends of two separate Local GI Corridor routes too. Furthermore, please also be aware that, within its own overall Local Green Space boundary extent, the Tove Wetland Pocket Park site area also wholly includes a 3.7 hectare ‘sub-area’ designated as the “Belle Baulk Park” PWS ( Potential Wildlife Site ) area too.

On Pages 105 through to 114, inclusive, for Chapter 11, headed as “The Natural Environment”:

Although you do indeed include references to the Upper Nene Valley Gravel Pits Special Protection Area ( SPA ) herein, at Section 11.2, starting on Page 105, for example, please note that the overall consultation documentation appears to include no references to, or consideration of, the Nene Valley Nature Improvement Area ( NIA ) zone itself. This is a
significant omission in our view, which must therefore be rectified in the final version of SNC’s Part 2 Local Plan.

With reference to the text content of Paragraph 11.2.3, on Page 106, and also the relevant entry in Item No. 4 in the Table shown for Policy NE1, on Pages 106 and 107, for clarity and our own better understanding, could you please just confirm to us does this wording mean that SNC are agreeing to implement the Nene Valley SPA SPD mitigation strategy (as has already been done by the relevant LPAs in the NNJPU area)?

With reference to the relevant content of both the text of Section 11.4, on Pages 109 and 110, sub-headed as “Green Infrastructure”, and also the specific Table shown therein for Policy NE3, we are of the view that the wording of the actual GI Policy statement here itself would greatly benefit from a more explicit inclusion, and highlighting, of biodiversity aspects within it.

With reference to Paragraph 11.6.2, on Page 112, we feel that, in this context, the most important and significant reference which needs to be extracted from, and highlighted within, the NPPF (of 24th July 2018) is the content of Paragraph 170, in Chapter 15, “Conserving and enhancing the natural environment”, on Page 49, where in Part d) it states: “170. Planning policies and decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;” (please note our emboldening, for emphasis).

With reference to the content of both Paragraph 11.6.3, on Page 112, and also the relevant portions of the specific Table shown for Policy NE5, as already set-out elsewhere here above, please note that we are of the view that suitable inclusions and references should also be made here to the categories of, at least, Local Geological Sites and Potential Wildlife Sites too, for example.

For the overall content of Appendix 4, headed as the “Glossary”:

Based upon the total combined content of The Wildlife Trust’s own feedback and comments, as set-out here above, we are therefore of the view that there a significant number of additional terms which could still usefully and beneficially be included in this same Glossary section of the overall documentation. Items such as Biodiversity Action Plan, Blue Infrastructure, GI Corridors, Local Geological Sites, the Nene Valley NIA and also the SPA
too, could perhaps be some extra entries here, for example.

We do hope that you find the above feedback to be of some interest and use to you and colleagues in respect of the consultation exercise in question.

Please do not hesitate to contact The Wildlife Trust again if you wish to discuss any of the above points in greater detail.

Many Thanks and all the best,
Alan.

Alan Smith
Planning and Biodiversity Officer

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We work to make our three counties a place where nature can flourish and enrich the lives of the people who live here. With your help we care for local wildlife and more than 100 nature reserves. Volunteering your time or donating money to us will directly benefit local wildlife.

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