Comments

Site Specific Part 2 Local Plan - Publication Plan Consultation (18/12/19 to 12/02/20)

We are pleased to note that this Part 2 Local Plan for Kettering includes a section highlighting the significance of natural capital and green infrastructure assets. Biodiversity is a key theme within green infrastructure. Paragraph 8.13 usefully highlights the existing biodiversity assets (SSSIs, LNR, LWSs, PWV and Pocket Parks) within the Borough as well as the need to restore ecological networks on the landscape scale, particularly within the Nene Valley Nature Improvement Area. However, there are a few modifications to this section, which we would recommend are included to prevent confusion in the interpretation of the Plan and ensure it aligns with the National Planning Policy Framework (NPPF).

First, Table 8.1 has the title Designated Natural Assets. Although Local Wildlife Sites are mentioned within paragraph 8.13 they are not included in the table. As there are over 60 of these sites across the Borough it would not be practical to list them all, however, a mention within the table would ensure that they are clearly recognised as an importance natural asset alongside the other designations. At present, it could be interpreted that natural assets do not include Local Wildlife Sites.

Another recommendation concerns paragraph 8.15. Whilst we agree that an additional policy within this Part 2 Local Plan may not be necessary due to the existence of policies within the Joint Core Strategy (JCS); there is one key change in national policy which has occurred since the publication of the JCS which we would recommend is included. The NPPF paragraphs 170 and 174 now require developments to provide a measurable net gain in biodiversity. We would recommend that this is demonstrated using a biodiversity metric. The expected Environment Bill will make this requirement statutory. We would recommend that a sentence is added to paragraph 8.15 to cover the use of a biodiversity metric by developments to demonstrate a measurable net gain in biodiversity.

Finally, the NPPF in paragraph 174 also states that plans should:

“Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.”

Although this Local Plan includes maps of green infrastructure networks it does not have clear maps illustrating the sites and networks required in the NPPF paragraph quoted about. We would advise...
that the development and inclusion of these maps would considerably strengthen this section of the Plan and better align it with the NPPF.

Tests of Soundness

Do you consider the Local Plan is sound in terms of being:

Justified
Effective
Positively prepared
Consistent with National Policy . No

Notifications

Do you wish to be notified? . When the Plan is submitted for independent examination?
 . When the Inspector's Report is published?
 . When the document is adopted?