Comments

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

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Consultation Point Natural Capital and Green Infrastructure (View)
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Representation

Please use a separate form for each representation.

Which part of the Publication Plan does your representation relate to?
Natural Capital & Green Infrastructure

Tests of Soundness

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

- Justified . No
- Effective . No
- Positively prepared . No
- Consistent with National Policy . No

Legal and Procedural requirements

Do you consider the Local Plan has been prepared in line with legal procedural requirements? Yes

Duty to Cooperate

Do you consider the Local Plan to be compliant with the Duty to Cooperate? Yes

Reasons

Please give the reason(s) why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the statutory Duty to Cooperate.
We do not consider this section of Site Specific Local Plan 2 for Kettering Borough sufficiently identifies and seeks to protect all the natural assets and green infrastructure that exist within the Borough.

Table 8.1 - Designated Natural Assets
Paragraph 8.13 refers to over 60 Local Wildlife Sites but they are not recognised / identified in Table 8.1.

As stated in paragraph 8.14, the JCS, particularly Policy 4, seeks to protect, enhance and restore biodiversity assets and we believe the Local Plan should recognise and include these Local Wildlife sites within Table 8.1. The first image which accompanies this section of the plan shows one notable wild life site within the borough, Cransley Reservoir, but it is not a designated natural asset.

Green Infrastructure
The GI policy for the Borough is not easy to comprehend, on a number of levels:

- Paragraph 8.23 is accompanied by a map of the Green Infrastructure Corridors. Not all designated Local Corridors are identified correctly - 9b is not Finedon to Little Addington.
- Policy NEH2 states: The integrity of the Borough Level Green Infrastructure Network (BLGIN) as set out in Figure 8.1 of this Plan will not be compromised by new development. It is not clear what this relates to – nothing is labelled 'Figure 8.1' but we understand it is the GI corridor map.

The NPPF paragraph 174 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.

Whilst this Borough level plan has identified some GI projects for improvement / investment this map does not recognise or map all local wildlife-rich habitats and wider ecological networks. We do not consider either Table 8.1 or Figure 8.1 achieves the aim of the NPPF at local level. Without proper mapping it is impossible to safeguard, manage, enhance or restore them.

In this parish, immediately to the west of Kettering, there is a wildlife corridor which includes both Thorpe Malsor and Cransley reservoirs. Cransley Reservoir is a designated LWS and both reservoirs and the surrounding countryside are important sites for biodiversity. They form part of the wider ecological network that stretches down to Pitsford in the south west. The area is not only a rich habitat in its own right but the reservoirs are also a stopping off point for migrating wildfowl.

We are extremely concerned that the high level of protection afforded to this area has been removed by superseding Policy 10 with Policy NEH2. It is no longer identified, mapped or safeguarded despite being one of only 3 notable 'blue infrastructure' water environments within the Borough. Both reservoirs supply and link in to Slade Brook, which is a recognised local borough level GI corridor. We believe this area should be included in the BLGIN. It needs to be recognised and protected.

**Attendance at the examination hearings**

**If you are seeking to change the Plan, would you like to attend the examination hearings?** Yes

**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?