

**Northampton Borough Council**

**Biodiversity**

**Supplementary Planning Document**

**Schedule of Responses**

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## **Introduction**

This report sets out the schedule of responses and agreed actions arising from the consultation on the draft Biodiversity Supplementary Planning Document (SPD). Representations were invited on the consultation draft of the SPD for a period of 6 weeks between 9 February to 5.00pm on 23 March 2015 to comply with Regulations 12 and 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012

## **The Consultation Statement**

The Consultation Statement (2015) for this SPD is a separate document to be read in conjunction with this schedule. It also conforms to Regulations 12 and 13 of the Act. It sets out the details of the people consulted in assisting with the preparation of the document, how they were consulted, what key issues were raised and how they have been addressed in the SPD.

The purpose of the Consultation Statement was twofold:

- To comply with Regulations 12 and 13 of the Act. This includes the public consultation exercise undertaken between the 9th February and 23rd March 2015 and
- To demonstrate that a comprehensive consultation exercise has been undertaken in compliance with the respective Local Planning Authorities' Statements of Community Involvement (SCI)

## **Responses to the Consultation Draft SPD**

12 organisations and individuals responded to the consultation draft of the SPD making a total of 76 separate comments. All responses were carefully considered and a few minor alterations were made to the SPD to improve precision and clarify specific points. In addition a contents page was added for improved navigation, hyperlinks were inserted making direct links to named websites, A glossary of terms was introduced and illustrations provided to show best practice through photo case studies.

This document will continue by setting out the full schedule of representations alongside any actions agreed arising from these.

**Schedule of  
Consultation Responses & Agreed Actions**

## Biodiversity SPD comments schedule

Organisation	Response	Order	Response	Steering group response
Local resident	Comment	General	Document seems admirable, no further comments	Noted, support is welcomed
Flore Parish Council	Comment	General	Flore Parish Council does not feel qualified enough to comment on this	Noted
Weedon Bec Parish Council	Comment	General	SSSI and NNR. Document does not make it clear how to determine if an application site is 'within 500m of SSSI/NNR'. We found (Sec 3 4 <sup>th</sup> bullet point) saying Northampton has many sites, species and habitats that are important and can be found in Annex 1 - Annex 1 show species and habitats but does not mention specific sites so the reference is incorrect. You can find SSSIs online but we feel your document should make it clearer whose responsibility it is to determine the proximity to these areas.	Agreed. Text will be amended to improve precision.
Weedon Bec Parish Council	Comment	General	Our other concern is that it still seems to be possible for the applicant and local planners to decide that there isn't any impact to biodiversity early on in a planning application. In the case of the proposed Gladman application for New Street in Weedon, it appeared to be the opinion of the planning office that there was no need to do any further ecological assessments. Although, in fairness, the application did actually submit one, we would want assurances that a potentially important habitat/area couldn't be missed because of a mis-diagnosis early on. It seems that once a site is shown to have good biodiversity, the protection offered is fairly comprehensive.	Noted. The process outlined in the SPD is 'front-loaded' for this very reason. Following the process closely and engaging good ecological advice should ensure that biodiversity features and potential impacts are identified and addressed early on. Likewise, it should ensure that where no biodiversity features are found, applicants are able to proceed in a timely fashion and without incurring unnecessary expense.
Northamptonshire County Council	Comment	Annex 3	Suggest adding the new CIEEM Guidelines for Ecological Report Writing and BS 42020:2013 Biodiversity Code of Practice for Planning and Development to Annex 3	Agreed. Change will be made.

Kettering Borough Council (Planning Policy)	Support	General	The step by step guide is helpful; the Borough Council supports this approach. The biodiversity checklist and survey calendar in Appendices 1 and 2 are useful for helping to assess what information should be submitted with an application.	Noted; support is welcomed.
Kettering Borough Council	Comment	General	At Stage A, it would be useful if some graphics/examples could be included to demonstrate how biodiversity can be incorporated into development.	Agreed. The final version of the SPD will include a series of 'photo case studies' to illustrate different site- and building-scale measures to enhance biodiversity.
Kettering Borough Council	Comment	General	A contents page should be added to assist navigation of the document	Agreed. A table of contents will be included in the final version.
Kettering Borough Council	Comment	Statutory Status of the SPD	Page 2 – delete 'e' and replace with 'y' (be to by)	Agreed. Change will be made.
Kettering Borough Council	Comment	Statutory Status of the SPD	Page 2 – a stronger reference should be made to the emerging JCS and potential review of the SPD once the JCS is adopted.	Partially agree. Reference to the emerging JCS has been included. However the SPD has been developed to be consistent with the draft JCS, so a post-adoption review will not be necessary.
Kettering Borough Council	Comment	Definitions	Page 3 – changes from 'A' and 'B' to 'L' and 'R' in respect of Figure 1	'L' and 'R' will be changed to 'A' and 'B' to reflect the diagrams.
Kettering Borough Council	Comment	Legislation and policy base: key messages	Page 5 – change 'Local Biodiversity Action Plan' to 'Northamptonshire Biodiversity Action Plan' to provide clarity on which document this refers to	Disagree. The term 'local' is used because the section is about development <i>principles</i> , which apply everywhere and not just in Northamptonshire.
Kettering Borough Council	Comment	Stage A5: delivering 'net gain'	Page 12 – make mention of the Revital-ISE project and potentially the GIDP, in relation to enhancements to address this.	Disagree. The document is intended for adoption county-wide; consequently only county-scale projects and initiatives have been included.
Kettering Borough Council	Comment	Stage A5: delivering 'net gain'	Page 13, Figure 3 – make NIA map full page size to make it more legible.	Agree. Change will be made.
Kettering Borough Council	Comment	Appendix 1	Page 20 – references 23 and 24 in the footnotes should be moved to the following page	Disagree. Footnotes are on the same page as the references.

Kettering Borough Council	Comment	Annex 2	North Northamptonshire Core Spatial Strategy (adopted 2008) – reference to the emerging JCS should be placed here	Agree. Change will be made.
Kettering Borough Council	Comment	Annex 2	Local plan saved policies – List reference sources of other strategies. Addition of Revital-ISE project.	Disagree. The document is intended for adoption county-wide; consequently only county-scale projects and initiatives have been included.
Anglian Water	Comment	General	Anglian Water has no comments relating to the draft SPD	Noted
Collyweston Parish Council	Comment	Annex 3	The Biological Record Centre (based at the Centre for Ecology and Hydrology) should be added to the Annex	Agreed: the BRC will be added
Collyweston Parish Council	Comment	Stage A2: Nature Conservation Survey	Paragraphs regarding species records do not take account of the fact that all Northamptonshire Biodiversity Records Centre data should be shared through the NBN Gateway. The NBRC will be an excellent source of data but it will not hold all the data – more will be available through the NBN Gateway. So unless the NBRC is not sharing all the data then the paragraphs are misleading.	Disagree for the following reasons: <ul style="list-style-type: none"> <li>• The NBN is unlikely to have complete information about where species have been recorded, let alone habitat information which can be used for inform mitigation or enhancement efforts</li> <li>• Reliance on NBN data is not regarded as good or even acceptable practice and contravenes CIEEM guidelines</li> <li>• Records are the intellectual property of the individual recorders. While data are widely shared between local record centres and the NBN some individual record owners do not permit the sharing of their data between agencies.</li> <li>• The terms and conditions applied under the NBN's Data Exchange Agreement require that for any commercial use of data, the user gain written permission from every record owner. This will not be practical in most circumstances.</li> </ul>

Collyweston Parish Council	Comment	Stage A2: Nature Conservation Survey	This sentence on page 8 is a bit spurious because you can't confirm absence: 'As long as there is a reasonable likelihood...surveys must be conducted to confirm its presence or absence.'	Agreed. Sentence will be amended.
Collyweston Parish Council	Comment	Stage A3: Avoidance and Mitigation	There could be a more comprehensive and explicit list of mitigation measures.	Disagree. The measures mentioned were included specifically to illustrate the difference between avoidance and mitigation. Mitigation measures must be tailored specifically to the impact and so vary widely. Applicants should carefully consider any necessary mitigation measures rather than choosing from a 'menu' of options in an SPD.
Collyweston Parish Council	Comment	Stage A5: Enhancement	'Enhancements should add to existing habitat networks where they exist' – this is vague, what is meant by the term 'habitat networks'?	Noted. The wording will be amended to better explain the concept.
Daventry District Council	Comment	General	The document should consider making reference to the Rutland Water SPA/Ramsar site even though it sits beyond the county boundary.	Disagree. The Upper Nene Valley Gravel Pits SPA is at risk from development because of its location within the urbanised areas of the county. It is therefore a primary consideration for developers in Northamptonshire. Rutland Water is some distance from the county boundary and the closest settlements are rural villages. As such it is considered generally not at risk from development in Northamptonshire and for simplicity's sake has not been included in this SPD.
Daventry District Council	Comment	Section 3	4 <sup>th</sup> bullet: provide reference/link to Biodiversity Action Plan.	Noted. The final document will include hyperlinks to websites, the glossary etc.
Daventry District Council	Comment	Section 3	4 <sup>th</sup> bullet: The BAP was developed in 2009, is it worth mentioning when it will next be reviewed	Noted. Dates have deliberately not been included to prevent the document from appearing to become 'out of date' in future.
Daventry District Council	Comment	Section 3	4 <sup>th</sup> bullet: this mentions 'net gain', also referred to as 'enhancement' in the diagram on page 6. Some consistency is required.	Disagree. The term 'net gain' comes from the NPPF and is used here to illustrate a key policy message related to development as a whole. 'Enhancement' is commonly used in relation to specific measures on the ground. The difference is subtle but distinct.



Daventry District Council	Comment	Section 5, Stage A	Paragraph 1, 4 <sup>th</sup> sentence: delete 'as' Paragraph 1, final sentence: change 'be' to 'as'	Agreed. Typo will be fixed.  Disagree. This is the correct form for present subjunctive.
Daventry District Council	Comment	Section 5, Stage A	2. Ecological survey: more explanation required on measuring 'value' and what this means.	Disagree. Elaboration is not necessary at this stage as the Biodiversity Checklist is simply a screening tool. Professional ecologists who would conduct detailed surveys should be familiar with industry standard procedures for determining biodiversity value. Such detail is beyond the scope of the SPD.
Daventry District Council	Comment	Section 5, Stage A	Last paragraph: suggest replacing first sentence with 'Habitat and species surveys are a requirement prior to determination of planning permission'.	Disagree. Despite the fact that it should almost never be done, relegating ecological to surveys to condition is widely undertaken by planning authorities. This wording was included to make it absolutely clear that this is not acceptable practice.
Daventry District Council	Comment	Section 5, Stage A1	First paragraph: suggest amending text with () – 'and identify any (further) surveys required. The (Biodiversity) Checklist (may) be completed by the applicant...advice at this stage is (recommended).	(further): disagree. At the point of completing the Checklist, no surveys have been conducted. The Checklist does not constitute a survey. (Biodiversity): noted. (may): disagree. It is not a matter of permitting an applicant to complete the Checklist but instead pointing out that they might have the ability and knowledge to do so. (recommended): disagree. The use of the shorter word 'advised' lowers the reading level and improves readability.
Daventry District Council	Comment	Section 5, Stage A1	2 <sup>nd</sup> paragraph: perhaps reference should be made to the need for ecological surveys rather than 'surveys' should there be any 'yes' answers to the 1APP.	Agreed. Change will be made for clarity.
Daventry District Council	Comment	Section 5, Stage A1	Final paragraph: 'Attempts to exclude...' The specific criminal law could be specified.	Disagree: it is not necessary to illustrate which conditions could constitute an offence but simply to issue a caution.

Daventry District Council	Comment	Section 5, Stage A2	Survey methodology: add subheadings to the paragraphs in sequence as follows: 'biodiversity checklist', 'timing of survey and good practice considerations', 'extended Phase I habitat survey', 'historical species records', 'biodiversity features' and 'resources and further information'	Disagree: breaks up text unnecessarily.
Daventry District Council	Comment	Section 5, Stage A2	2 <sup>nd</sup> paragraph: what does 'accepted good practice' refer to?	'Accepted good practice' refers to the standard survey methods mentioned in the previous paragraph. Wording will be amended for clarity.
Daventry District Council	Comment	Section 5, Stage A2	Rephrase the sentence 'the reason should...' by deleting 'as should the effect on the reliability of the results' and replace with [and]'be outlined and explained clearly as this will affect the reliability of the data'.	Disagree. The important point is not how the survey methods vary from the standard, but how the data themselves are likely to vary as a result. Knowing how the data may be affected will allow the planning authority to decide whether the deviation from accepted methods is acceptable in the given case.
Daventry District Council	Comment	Section 5, Stage A2	The Phase I Habitat Survey should be included in the Appendices.	Disagree. It is beyond the scope of this SPD to include specific survey methodologies.
Daventry District Council	Comment	Section 5, Stage A2	3 <sup>rd</sup> paragraph: define 'botanical interest'	Disagree. There is no standard definition of 'botanical interest'. Ecologists must base their assessments on experience and knowledge.
Daventry District Council	Comment	Section 5, Stage A2	4 <sup>th</sup> paragraph: replace 'previous species records' with 'historical species records'  Refer to 'Biodiversity Checklist', not just 'Checklist'  'Specific surveys' should be 'specific ecological surveys'	Agreed. Change will be made.  Agreed. Change will be made.  Disagree. 'Ecological' is implied.
Daventry District Council	Comment	Section 5, Stage A2	7 <sup>th</sup> paragraph: 'applicants of major <u>and</u> /or complex proposals..' (add 'and')	Agreed. Change will be made.

Daventry District Council	Comment	Section 5, Stage A3	1 <sup>st</sup> sentence: replace 'from' with 'at'  'The overall objectives...' add 'and enhance existing biodiversity'	Disagree. Survey findings should be considered at <i>all</i> stages of the planning process, not only at the beginning. Hence the use of 'from'.  Disagree. This section is about avoidance and mitigation specifically; enhancement is addressed in the section on net gain.
Daventry District Council	Comment	Figure 2	In the mitigation hierarchy, should 'enhance' be included as reference is made to 'net gain'/'enhancement' in the wider document.	Disagree. The mitigation hierarchy refers to addressing potential impacts to <i>existing</i> biodiversity to achieve a situation of 'no net loss' of biodiversity. 'Net gain'/'enhancement' refer to additional biodiversity achieved as a result of development.
Daventry District Council	Comment	Section 5, Stage A4	1 <sup>st</sup> paragraph: could or should reference to made to the Defra 'biodiversity offsetting' project. Is there recent data from pilots on this?	Biodiversity offsetting is beyond the scope of this SPD. Reports from pilot areas reveal little uptake by developers so data are not robust. Offsetting is a type of compensation, which according to the NPPF is a <i>last resort</i> . It is expected that other compensation options will in almost all cases be pursued to the satisfaction of the various parties before offsetting is considered.
Daventry District Council	Comment	Section 5, Stage A4	1 <sup>st</sup> bullet: define 'reasonably certain' or rephrase	Disagree. The extent to which success is 'reasonably certain' will depend on a range of factors. Recreation and especially translocation are normally difficult and need to be considered on a case-by-case basis.
Daventry District Council	Comment	Section 5, Stage A4	3 <sup>rd</sup> paragraph: 'biodiversity is extremely complex...', replace 'it would not be easy to quantify' with 'it is not easy to quantify'.	Disagree: the implicit 'if' clause of 'even with' requires the conditional verb form.
Daventry District Council	Comment	Section 5, Stage A5	3 <sup>rd</sup> bullet: replace 'should consider working' with 'be encouraged to work'.	Disagree: the document is written 'to'/for applicants, who are directed to consider cooperating with other applicants.
Daventry District Council	Comment	Section 5, Stage A5	8 <sup>th</sup> bullet (re ornamental planting): is there a link to the NCC 'right tree in the right place' scheme?	'The right tree in the right place' is a phrase widely used by various organisations. The SPD makes no link to any of these.

Daventry District Council	Comment	Stage B	1 <sup>st</sup> paragraph: replace 'and depending on the outcome' with 'along with' and delete 'should have been completed'.	Agreed that sentence could be amended for clarity however this would compromise prescriptiveness.
Natural England	Support	General	The SPD should help all parties involved in new development proposals in Northamptonshire to fully consider biodiversity issues. We note that the document links well to the Upper Nene Valley Gravel Pits SPA SPD, making several links to when this needs to be considered.	Noted; support is welcomed.
Natural England	Comment	Section 2: box	Refers to the need to consult NE on development affecting European sites. We recommend the box also make reference to consulting us on development affecting SSSI; a reference to the Wildlife and Countryside Act would underpin this.	Agreed. Change will be made.
Natural England	Comment	Appendix 1: Biodiversity Checklist	The checklist specifies the situations where development may affect a SSSI. Criteria for this are given at Question 3 but it is difficult to provide criteria that can be applied equally to all SSSIs due to the differences that exist in sensitivity between SSSIs notified for different features. We recommend that instead of attempting to do this in the document, a link is included to the MAGIC website where Natural England's Impact Risk Zones can be checked to establish any risk to nearby SSSIs from development.	Agreed. Change will be made.
Bovis Homes	Comment	Section 4	The statement in box A5 that 'development must where possible deliver a net gain in biodiversity' does not accord with the spirit of paragraph 109 of the NPPF that 'the planning system should contribute to and enhance the natural and local environment by ...minimising impacts on biodiversity and providing net gains in biodiversity where possible'. We would therefore recommend that 'must' be replaced with 'should'.	Agreed. Change will be made.

Bovis Homes	Comment	Appendix 1	We consider the Biodiversity Checklist to be too prescriptive, particularly with regard to the need for further surveys in section 2A Protected Species/1APP Question 13a. We recommend the following change: 'for each question, the black dots in column C indicate which species <u>could be expected to be</u> required.	Partially agree. The checklist is adapted from one used in other parts of the country, and which we do not believe is overly prescriptive. The sentence in section 2A will however be amended for clarity.
Bidwells (on behalf of Davidsons Developments Ltd)	Comment	General	We note the SPD does not contain any clearly defined policies or reasoned justification for the approach set out in accordance with Regulation 8(2) of the Town and Country Planning ((Local Planning) England) Regulations 2012	Disagree. There is no requirement for SPDs to include policies.
Bidwells (on behalf of Davidsons Developments Ltd)	Comment	General	In terms of the role and purpose of SPDs, the NPPF specifies at paragraph 153 that SPDs should only be where there is clear justification and where they can help an applicant make a successful application.	Disagree. Paragraph 153 of the NPPF states that SPDs 'should be used where they can help applicants make successful applications'. In outlining a standard procedure for integrating biodiversity into development applications the draft SPD provides certainty and consistency to both applicants and case officers.
Bidwells (on behalf of Davidsons Developments Ltd)	Comment	General	There appears to be little reasoning to warrant an SPD as distinct from clear and concise guidance to assist in understanding appropriate survey windows and the approach to consulting with Natural England.	Disagree. The draft SPD brings together disparate guidance into a standardised approach for the county, informed by local ecological conditions.
Bidwells (on behalf of Davidsons Developments Ltd)	Comment	General	SPDs must help an applicant make a successful application.	Disagree. SPDs 'can' help an applicant make a successful application.
Bidwells (on behalf of Davidsons Developments Ltd)	Comment	General	There is no certainty that the SPD will be adopted by each of the Local Planning Authorities within Northamptonshire.	Agreed. However in the absence of a draft SPD there would be certainty that none of the Local Planning Authorities would adopt the document.
Bidwells (on behalf of Davidsons Developments Ltd)	Comment	General	The SPDs state that they are 'in conformity' with both the North Northamptonshire Joint Core Strategy (2008) and the West Northamptonshire Joint Core Strategy (2014). However it is not clear [to] which policies within the document relate.	Disagree. The relevant policies are stated in Annex 2.

Bidwells (on behalf of Davidsons Developments Ltd)	Comment	General	The North Northamptonshire Joint Planning Unit will be submitting a new Joint Core Strategy for examination later this year. The core strategies will also be supplemented by Local Plans Part 2 prepared by the relevant Local Planning Authority. Such documents will take precedence over an SPD. Should the documents proceed as SPDs then any locally specific changes to policy or approach will need to be reflected in the text.	Noted. However the SPD has been developed and is consistent with the draft North Northamptonshire Local Plan Part 1, with which the Local Plans Part 2 must also be consistent. No conflict is therefore expected. Further, as the SPD does not introduce new policy there is no policy with which future policies could conflict. The SPD consolidates best practice which is not expected to change.
Bidwells (on behalf of Davidsons Developments Ltd)	Comment	General	The consultation documentation is not available on Northamptonshire County Council's website (the body that prepared the SPDs).	Disagree. The notice sent to consultees – and the consultation website – clearly states that the SPD was prepared by the Nene Valley NIA project and that the consultation was hosted by the North Northamptonshire Joint Planning Unit. Northamptonshire County Council simply provided an email address for receiving representations.
Bidwells (on behalf of Davidsons Developments Ltd)	Comment	General	Town and Country Planning ((Local Planning) England) Regulation 35(1) requires that consultation documentation be published on the Local Planning Authority's website. The publicity and availability of the documentation, solely on the North Northamptonshire Joint Planning Unit's website, is not considered appropriate particularly as the intended geographical coverage extends into West Northamptonshire. For example, we were unable to find any reference to the material from authorities in West Northamptonshire; therefore the SPD has not been properly consulted on in accordance with the regulations and cannot be adopted.	Partially Agree. It is regrettable that no response was made to repeated efforts to contact South Northamptonshire and Daventry District Councils regarding the consultations. Should these authorities wish to adopt the document they will therefore need to consult on the final document and possibly adopt a modified version.  However, Northampton Borough Council conducted a consultation in accordance with their Statement of Community Involvement. The consultation was announced in the consultations section of the council website. Northampton Borough Council is therefore in a position to adopt the document, as are the four North Northamptonshire Local Planning Authorities.

Bidwells (on behalf of Davidsons Developments Ltd)	Comment	General	We note that the document was prepared by Northamptonshire County Council. Whilst we support in principle the coordinating role, we believe that within the document there must be a clear statement of support from each of the relevant Local Planning Authorities who would be expected to adopt the document as the document falls outside those matters considered to be 'County Matters'.	Disagree. As stated above, Northamptonshire County Council simply provided an email address for receiving representations. The Local Planning Authorities – not including South Northamptonshire and Daventry District Councils as outlined above – have followed the procedures necessary for adoption.
Bidwells (on behalf of Davidsons Developments Ltd)	Comment	Introduction	The following sentence should be removed: 'it [the SPD] will also be a useful tool for those developing planning policy and making site allocations'. This is not a specified purpose of SPDs which is intended to help an applicant make a successful application (Paragraph 153 of the NPPF)	Partially agree. The phrase 'will also be a useful tool' indicates the <i>possibility</i> of a broader, informative application beyond the SPD's actual purpose. While the sentence will not be removed it will be altered to clarify this distinction.
Bidwells (on behalf of Davidsons Developments Ltd)	Comment	Section 2	The information set out in a box is not considered to 'assist' in making an application. This is standard national advice.	Disagree. While national advice it nevertheless is of assistance to applicants.
Bidwells (on behalf of Davidsons Developments Ltd)	Comment	Section 5, Stage A1	It is unclear why the information that must be provided as part of the application process (Question 13 of the 1APP form) must also be provided as part of the 'checklist'. This appears to be unnecessary duplication of information.	Disagree. Completing the Biodiversity Checklist generates the answer to 1APP Question 13. If the Checklist is not completed there is no certainty that answers to 1APP Question 13 are fully informed and not simply guesses on the part of the applicant.
Bidwells (on behalf of Davidsons Developments Ltd)	Comment	Section 5, Stage A5	Re text box: it would be helpful if the document could set out the relevant species as the availability of the document [ <i>The Flora of Northamptonshire and the Soke of Peterborough</i> ] may be limited.	Disagree. There are too many such species for such a list to be useful. It is also expected that ecological consultants working in Northamptonshire or any other area have – or have access to – the local <i>Flora</i> as a matter of good practice.
Bidwells (on behalf of Davidsons Developments Ltd)	Comment	Section 5, Stage B	We are concerned regarding the inconsistency in approach between authorities. It is considered that it may be more effective to ensure consistency in the validation requirements across the county.	Noted, however in practice this is not likely to happen. Therefore the optimal solution is to direct applicants to verify local validation requirements.

Bidwells (on behalf of Davidsons Developments Ltd)	Comment	Appendix 1: Biodiversity Checklist	This is a duplication of information that will be collected through the planning application (1APP). It is not considered necessary to duplicate this information to accompany an application. However, the use of a similar list, if adopted consistently across the county, could be used to assist in pre-application discussions and negotiations. This would be supported in principle where it would lead to consistent decision making.	Disagree. As stated above, the Biodiversity Checklist is the means by which information to answer 1APP Question 13 is obtained. Applicants should not be completing Question 13 without using the Checklist to ensure that all potential biodiversity features have been considered.
APC Planning	Comment	General	Our client recognises the importance of biodiversity as a key element to securing sustainable development and welcomes the Councils of Northamptonshire's efforts to introduce a county-wide SPD to supplement those planning policies contained within the development plan for their respective legislative areas. Our client also welcomes the standardised approach that the adoption of the SPD will introduce and agrees that it will provide clear guidance when bringing forward development proposals.	Noted. Support is welcomed.
APC Planning	Comment	General	Our client accepts that planning policy is such that new development should provide a net gain in biodiversity where possible. However the Councils' recognition that habitat and species surveys are not always absolutely necessary at the point of submitting a planning application is welcomed.	Noted. Support is welcomed.
APC Planning	Comment	General	There remain concerns that the combined requirements of planning policy contained within the DPD and the level of guidance provided in the SPD may be overly demanding of developers and that information requirements and expectations for biodiversity enhancements should be proportionate to the development to which they relate.	Noted. The process outlined in the SPD has been designed to help applicants identify and address those potential biodiversity impacts associated with an application. The process is admittedly 'front-loaded'. This has been done to help applicants and case officers identify potential issues as early as possible in the planning process so they can be more easily and effectively addressed. Agreed that biodiversity enhancements should be proportionate in scale.



APC Planning	Comment	General	While the uniform approach to biodiversity across the county, set out with in the document, is welcomed, concerns remain over the different planning application validation requirements of each authority and the potential uncertainty that this will cause applicants.	Noted, however in practice this is not likely to happen. Therefore the optimal solution is to direct applicants to verify local validation requirements.
Northamptonshire Local Nature Partnership	Comment	General	N-LNP promotes the natural environment of Northamptonshire and the SPD's basic emphasis on promoting our biodiversity on a county landscape scale is welcomed. Guidance to developers and authorities on appropriate steps to take is often required and the SPD can fulfil a useful role in ensuring that development and population growth go hand in hand with respecting and appreciating the environment in which they will sit and, hopefully, fit.	Noted, support is welcomed.
Northamptonshire Local Nature Partnership	Comment	General	As a statutory prescribed body for plan-making purposes, the N-LNP should be referenced I the SPD at various points. This includes the encouragement of developers and local planning authorities to consult the N-LNP about the impacts of major planning proposals (whether prospective/actual development plan allocations or prospective/actual planning applications).	
Northamptonshire Local Nature Partnership	Comment	General	There is a reference to "Case studies: to be integrated into text (after Stage D) and, for the SPD to retain basic backing of the N-LNP, it is essential that such case studies are accepted by the N-LNP as genuinely good examples. I would ask you to consult the N-LNP on the inclusion of case studies before so doing.	Disagree. The case studies are very simple as requested by case officers. They will consist of a photo with one or two sentences and be included for illustrative purposes only. They have been selected by ecologists and can therefore be assumed to be examples of good practice. Consultation is deemed unnecessary.