

31 March 2015

Sandra Mitcham, Town Clerk
Higham Ferrers Town Council
Town Hall
Market Square
Higham Ferrers
Rushden
NN10 8BT

RE: Higham Ferrers Neighbourhood Plan Regulation 14 Consultation Version

Dear Ms Mitcham:

I am writing in response to your consultation on the Higham Ferrers' Neighbourhood Plan.

The north of Higham Ferrers lies within the Nene Valley Nature Improvement Area (NIA) (Figure 1 below). As the Natural Development Officer for the NIA my interest in this consultation is founded on achieving a net gain in biodiversity, ecological connectivity and green infrastructure within the NIA. The Nene Valley NIA was designated by Defra in March 2012; it extends from Daventry to Peterborough and includes the River Nene and its main tributaries. NIAs are ecological networks recognised in the National Planning Policy Framework and were established to reconnect wildlife habitats and help species respond to the challenges of climate change. Further information about the Nene Valley NIA can be found at www.nenevalley.org.

I was pleased to see the document highlights Higham Ferrers' relationship to the NIA, and I welcome the broad objectives of ensuring good design standards and enhancement of the natural environment. My specific comments are as follows:

- **HF.H3 – Higham East:** the 7th bullet point refers to existing 'sensitive habitats'. I would rather 'priority habitats' be used instead. 'Priority habitats' is a recognised term that refers to the 56 habitats of 'principal importance' for England under section 41 of the Natural Environment and Rural Communities Act 2006. As such it is more appropriately used here.
- **HF.DE1 – Achieving High Quality Design:** I applaud the reference in the 4th bullet to native species landscaping. I would recommend however that the final sentence be amended to read '...landscaping schemes should seek to include *locally appropriate* native species'. Many species native to the UK are not found or have very limited distribution in Northamptonshire. Species which may be appropriately planted in naturalised schemes in other parts of the county might not be suitable in the Higham Ferrers area. This amended wording accounts for the often very localised distribution of plant species.
- **HF.DE3 – Access to Green Infrastructure Network:** in my view the wording of the first bullet should more closely reflect that used in the draft North Northamptonshire Joint Core Strategy (Policy 4). I would therefore change the phrase 'does not cause significant harm to' to 'does not have an adverse impact, either alone or cumulatively on'.

Thank you very much for the opportunity to comment on your neighbourhood plan consultation.
Please do not hesitate to contact me if you have any questions or require any additional information. I
can be reached at hwebb@northamptonshire.gov.uk or on 01604 361210.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'H Webb', with a long horizontal flourish extending to the right.

Heather Webb MSc MCIEEM
Natural Development Officer
Nene Valley NIA