



**Bedfordshire  
Cambridgeshire  
Northamptonshire**

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East Northamptonshire District Council  
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Northamptonshire  
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27<sup>th</sup> June 2019

**Application Number: 18/02428/FUL**

**Location: Land south of Top Lodge, Top Lodge Road, Fineshade**

**Proposal: Change of use to timber lodge holiday park and the development of ancillary infrastructure**

Thank you for the opportunity to comment on the additional information provided for the above proposal. We are pleased to see that a reptile and NVC survey have been conducted since we last objected to this application on 14<sup>th</sup> February 2019. As the reptile survey found evidence of breeding populations of all of the four reptile species that are present in the county we consider this site to be of significant value. We do not consider the proposed mitigation measures to be adequate. Due to the significance of the site for reptiles and lack of suitable mitigation, we continue to object to this application. Our reasons for objection are explained below:

#### *Significance of the Site for Reptiles*

The Ecology Assessment (May 2019) carried out reptile surveys at the application site in late April and May 2019. The surveys found juvenile and sub-adult Common Lizards (*Zootoca vivipara*), Grass Snakes (*Natrix helvetica*), Adders (*Vipera berus*) and Slow Worms (*Anguis fragilis*) indicating that breeding populations of each of these species are present. Good populations of Slow Worms and Common Lizards were found, along with populations of Adder and Grass Snake. This makes it a significant site within Northamptonshire. All of these reptiles are protected from harm under the Wildlife and Countryside Act, 1981 (as amended) and are also included as species of 'principal importance' under Section 40 of the Natural Environment and Rural Communities (NERC) Act, 2006. It is, therefore, important that their breeding sites are protected.

In the context of Northamptonshire, the presence of breeding populations of all four reptile species is particularly significant and shows the importance of that area for this group. Local Wildlife Sites are places which have been identified for their importance to wildlife when assessed against a set of criteria by a panel of local experts. The first criteria for the selection of a LWS for reptiles in Northamptonshire is:

- a) *All sites supporting breeding populations of adder or suitable habitats connecting populations of adders in close proximity to one another.*

This means that the application site meets the criteria to become a LWS for reptiles based on the single survey carried out within the Ecology Assessment. Additional survey work could raise the significance of the site still further. Although LWS do not receive statutory protection, they do receive protection within the planning process along with priority species/species of 'principal importance'. Paragraph 174 of the National Planning Policy Framework states that:

*"To protect and enhance biodiversity and geodiversity, plans should:*

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*b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”*

Locally, Policy 4 of the North Northamptonshire Joint Core Strategy promotes the protection of existing biodiversity assets.

#### *Proposed Mitigation Measures*

The Ecological Assessment suggested some mitigation measures for reptiles. We do not believe that they would be effective in this case for the following reasons:

- It is highly likely that the field to the south where the mitigation area is proposed is already significant for reptile species. It may not be able to support additional individuals.
- The enhancements proposed for the field to the south are mainly on the southern edge where they would be shaded by the woodland, particularly during parts of the year when reptiles are likely to need to bask most (in spring and autumn). The proposals for the creation of hibernacula and mosaic vegetation are not in the optimum location.
- The mitigation measures are only proposed on part of the field to the south. This does not seem to be practical, especially as they require careful grazing or a cutting regime. The division of the field would make two small compartments which would make grazing it more complicated and less likely to happen.
- The mitigation area should be managed for reptiles for the lifetime of the development, however, no mechanism to secure this is proposed within the application.
- The success of the mitigation should be monitored; however, there is no proposal for monitoring within the application.

Given the significance of the site for breeding reptiles and the lack of suitable mitigation measures, we do not consider this proposal to be in line with national and local policy and recommend it is refused.

I hope that our comments on this proposal are taken into account. If you have any further queries, please do not hesitate to contact me.

Yours sincerely,

[Redacted Signature]

Conservation Officer (Northamptonshire)

[Redacted Contact Information]