



Campaign to Protect  
Rural England  
Northamptonshire

The Wheatsheaf  
Spring Hill Farm  
Harborough Road  
Pitsford  
Northampton NN6 9AA

01604 780000  
admin@cprenorthants.org.uk  
www.cprenorthants.org.uk

SPA Guidance  
Planning Policy and Place Making  
North Northamptonshire Council  
Cedar Drive  
Thrapston  
Northamptonshire  
NN14 4LZ

Via email to: [planningpolicy@northnorthants.gov.uk](mailto:planningpolicy@northnorthants.gov.uk)

17<sup>th</sup> April 2026

Dear Sir/Madam

## **Draft Upper Nene Valley Gravel Pits Special Protection Area Guidance and Mitigation Strategy (2026)**

### **1. Introduction**

CPRE Northamptonshire welcomes the opportunity to comment on the draft **Upper Nene Valley Gravel Pits Special Protection Area (SPA) Guidance and Mitigation Strategy (2026)** prepared by North Northamptonshire Council.

The Upper Nene Valley Gravel Pits Special Protection Area forms part of the National Site Network and is protected under the **Conservation of Habitats and Species Regulations 2017**.

The SPA supports internationally significant populations of wintering waterbirds, including golden plover, lapwing and associated wetland species. These species rely not only on the designated water bodies but also on surrounding agricultural land for feeding and roosting; such land is known as functionally linked land (FLL) which as such also has protection as part of the ecological network supporting the habitat of the SPA .

The role of the Council as competent authority is therefore to ensure that development proposals are assessed in accordance with the Habitats Regulations and the requirements of the National Planning Policy Framework.

CPRE recognises the value of the guidance in providing a strategic framework for assessing development impacts and identifying mitigation measures. However, several aspects of the draft would benefit from strengthening to ensure full alignment with national policy and the Council's wider ecological strategy.

In particular, the guidance should:

- more clearly reflect the requirements of the Habitats Regulations and the NPPF
- give greater weight to the protection of **functionally linked land**
- more explicitly address cumulative development pressures in the Nene Valley
- integrate more clearly with the **North Northamptonshire Local Nature Recovery Strategy (2025)**.

## 2. Compliance with the National Planning Policy Framework (December 2024)

### 2.1 Ecological Networks and Supporting Habitat

(NPPF Paragraph 192)

Paragraph 192 of the NPPF requires planning policies and decisions to identify, map and safeguard components of local ecological networks, including areas identified for habitat management, enhancement, restoration or creation.

The farmland surrounding the SPA forms an integral part of the ecological network supporting the site. Wintering birds associated with the SPA regularly forage on agricultural land within several kilometres of the designated water bodies.

While the draft guidance recognises the concept of functionally linked land, it does not clearly identify or map the most important areas of supporting habitat, nor does it provide a clear policy framework for safeguarding these areas from development.

Greater emphasis should therefore be placed on:

- identifying areas of functionally linked land used by SPA bird populations
- recognising these areas as part of the wider ecological network of the Nene Valley
- ensuring that development proposals avoid the loss or fragmentation of key supporting habitats.

---

### 2.2 Protection of Habitats Sites

(NPPF Paragraphs 193–195)

Paragraph 193 establishes the mitigation hierarchy, stating that if significant harm to biodiversity cannot be avoided, adequately mitigated or, as a last resort, compensated for, planning permission should be refused.

Paragraph 195 confirms that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Habitats Regulations is being considered unless it has been established that there will be **no adverse effect on the integrity of the habitats site**.

The draft guidance correctly acknowledges the need for Habitats Regulations Assessment (HRA). However, there is a risk that the document could be interpreted as implying that impacts arising from development within the zone of influence can be addressed primarily through financial mitigation contributions.

While strategic mitigation measures can form part of an overall approach, they do not remove the requirement to demonstrate beyond reasonable scientific doubt that the integrity of the SPA will not be adversely affected.

The guidance should therefore make clear that:

- mitigation payments do not replace the requirement for project-level Habitats Regulations Assessment
- development proposals must first follow the mitigation hierarchy of avoidance, mitigation and compensation.

---

### 2.3 Cumulative Effects

(NPPF Paragraph 199)

The Habitats Regulations require that development proposals likely to affect a habitats site must be assessed both individually and **“in combination” with other plans and projects**. This principle is reflected in the NPPF, including paragraph 199 which requires planning decisions to consider cumulative environmental effects.

The Nene Valley is currently experiencing significant development pressure associated with both housing and economic growth.

While the draft guidance recognises cumulative recreational effects arising from residential development, it gives limited consideration to other sources of cumulative impact that may affect the SPA and its supporting habitats.

In practice, cumulative pressures on the SPA may arise from:

- housing development increasing recreational pressure
- employment and industrial development introducing lighting, noise and visual disturbance
- infrastructure projects altering land use patterns and movement corridors
- changes in agricultural land use affecting the availability of feeding habitat.

These pressures may not individually appear significant. However, the incremental loss or degradation of supporting habitats, together with increasing levels of disturbance across the wider landscape, has the potential to reduce the ecological resilience of the SPA over time.

**Given the legal requirement under the Habitats Regulations to assess effects both alone and “in combination” with other plans and projects, it is important that the guidance explicitly recognises the potential for cumulative impacts arising from multiple forms of development across the Nene Valley in order to ensure that the integrity of the SPA can be reliably protected.**

Without a comprehensive approach to cumulative impacts, there is a risk that incremental losses of supporting habitat or increases in disturbance could undermine the integrity of the Upper Nene Valley Gravel Pits Special Protection Area in the longer term.

## 2.4 Noise, Lighting and Disturbance

(NPPF Paragraph 198)

Paragraph 198 requires planning decisions to take account of the likely effects of pollution on the natural environment, including impacts arising from noise and artificial lighting.

Disturbance to SPA bird populations may arise not only from recreational activity but also from:

- artificial lighting
- noise disturbance
- visual disturbance
- increased traffic movements.

The draft guidance would benefit from broader recognition of these disturbance mechanisms.

---

## 3. Functionally Linked Land

The guidance recognises that SPA bird populations rely on land beyond the designated site.

However, its treatment of **functionally linked land** remains limited.

Farmland within the Nene Valley provides essential feeding habitat for SPA species such as golden plover and lapwing. Incremental loss of this land could reduce the carrying capacity of the SPA.

It is important to recognise that land functionally linked to the SPA is not afforded protection solely through designation boundaries, but through the operation of the Habitats Regulations themselves. Where land supports the qualifying species of a habitats site, it forms part of the **ecological system** necessary to maintain the integrity of that site and must therefore be considered within the scope of Habitats Regulations Assessment.

This principle is well established in case law and is reflected in national policy, including NPPF paragraph 192, which requires the identification and safeguarding of ecological networks, and paragraphs 193–195, which require that development should not proceed where it would adversely affect the integrity of a habitats site.

The guidance should therefore make clear that functionally linked land is not merely a contextual consideration, but a material factor in the assessment of impacts on the SPA, and that loss or degradation of such land may give rise to significant effects requiring appropriate assessment.

The guidance should therefore place greater emphasis on:

- identifying key areas of functionally linked land
- avoiding development within those areas
- preventing cumulative fragmentation of supporting habitat.

#### 4. Relationship with the Local Nature Recovery Strategy

The North Northamptonshire Local Nature Recovery Strategy identifies the Nene Valley as a priority landscape for ecological recovery and the enhancement of wetland habitats and ecological connectivity.

The SPA and its surrounding farmland form a central component of this ecological network.

The area also provides a significant educational and recreational resource for the county, including the Nene Wetlands Visitor Centre managed by the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire. This facility supports structured educational programmes and managed public access, including wildlife-focused activities, demonstrating the wider social and environmental value of the site.

Recent ecological restoration initiatives within the Nene Valley, including the reintroduction of beavers by the Wildlife Trust, further demonstrate that the SPA and its surrounding wetlands form part of an actively managed and evolving ecological system. Such initiatives contribute to habitat complexity, water management and biodiversity enhancement at a landscape scale, reinforcing the importance of protecting the wider ecological network in accordance with NPPF paragraph 192 and the objectives of the Local Nature Recovery Strategy.

The draft guidance would be strengthened by demonstrating how mitigation measures will contribute to these wider objectives, including:

- landscape-scale habitat recovery
- ecological connectivity
- long-term biodiversity enhancement.

---

#### 5. Development Pressures in the Nene Valley

The Nene Valley corridor is undergoing significant development pressure associated with both housing and employment growth.

Areas around **Thrapston, Wellingborough, Rushden and neighbouring settlements** are expected to accommodate substantial development over the coming decades.

Given the scale of change within the valley, it is essential that the SPA guidance provides a robust framework capable of addressing cumulative environmental impacts and protecting supporting habitats.

---

#### 6. Conclusion

CPRE Northamptonshire welcomes the preparation of updated guidance for the Upper Nene Valley Gravel Pits SPA.

However, the draft guidance should be strengthened to ensure full compliance with national planning policy and to provide a robust framework for protecting this internationally important site.

In particular, the document should:

1. Strengthen recognition of ecological networks and supporting habitats in accordance with NPPF paragraph 192.
2. Clarify the application of the mitigation hierarchy set out in paragraph 193.
3. Emphasise the integrity test required by paragraph 195.
4. Expand its consideration of disturbance impacts, including noise and lighting, consistent with paragraph 198.
5. Address cumulative development pressures across the Nene Valley in line with paragraph 199.
6. Integrate the mitigation strategy with the objectives of the North Northamptonshire Local Nature Recovery Strategy.

Yours sincerely

**Kevin Binley**

**Trustee, on behalf of CPRE Northamptonshire**