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Dear Strategic Planning and Infrastructure

Planning consultation: Draft Central Lancashire Local Plan (Regulation 19)

Thank you for your consultation on the above dated and received on 25 February 2025.

Draft Central Lancashire Local Plan (Regulation 19)

Natural England welcomes the opportunity to comment on the new Local Plan for Central Lancashire.

The advice in this letter is based on our review of the following documents:

- Central Lancashire Local Plan, 2023 – 2041
- Central Lancashire Local Plan: Habitats Regulations Assessment (HRA) Report: Screening and Appropriate Assessment, Dated January 2025
- Central Lancashire Integrated Assessment Scoping Report, Dated January 2025
- Central Lancashire Local Plan: Policies Map, Publication Version February 2025

Natural England's statutory remit covers a wide range of natural environment issues and areas, and our advice is focused only on those areas which are relevant to our remit.

Policy SS2: Settlement Hierarchy

Strategic Site Allocations – Introduction

In order to reflect the mitigation and recommendations made within the HRA, we advise this section clearly demonstrates the relationship between Policy EN7 Designated Sites for Nature Conservation, Policy HC5 Provision of new Open Space, Sport and Recreation Facilities, Policy EN5: Green Infrastructure, Policy EN10: Development and Flood Risk, EN11 – Water Resource Management and EN12 – Protecting Groundwater Source Protection Zones.

To ensure consistency with the HRA, we advise that the provision of sensitively designed noise, vibration and lighting strategies *may* be required within a Construction Environment Management Plan (CEMP) or equivalent, should there be an impact to Functionally Linked Land (FLL). Further comment is made within Policy EN14: Environmental Quality.

Policy HS2: Housing Allocations Chorley

Proposed allocation HS2.7 must also assess the potential impacts to West Pennine Moors SSSI. West Pennine Moors SSSI is notified for a series of scrub, mire, swamp, fen, heath, bog pool, spring, grassland and heath habitats. Lady's mantle and floating water-plantain are also qualifying plant species. The SSSI contains qualifying bird species and assemblages such as black-headed gull, Mediterranean gull, a large heronry, assemblages of upland moorland (such as merlin, curlew, and twite) and woodland breeding birds (such as cuckoo, tree pipit, wood warbler, spotted and pied flycatchers and willow tit).

In addition, Natural England utilises the [England Peat Status Greenhouse Gas and Carbon Storage](#) which identifies that the proposed allocation HS3.13 is situated on deep peat. In light of Natural England's statutory purpose (Section 2 of the Natural Environment and Rural Communities Act 2006) and the [Environmental Improvement Plan 2023 - GOV.UK \(www.gov.uk\)](#) which states that *degraded lowland peat accounts for 3% of England's overall greenhouse gas emissions. Reducing these emissions, by rewetting our agricultural peat soils, is essential to meeting legally binding net zero targets*, Natural England do not support the principle of developing on restorable peat. Consequently, Natural England advise policy wording reflects the safeguard of deep restorable peat and makes provisions for tailored habitat opportunities.

Natural England advise that it may be useful to refer to existing borehole data from the [British Geological Survey \(BGS\)](#) but if there is a lack of data across the proposal site then a peat survey may be required. A peat survey should be undertaken by a soils scientist and should determine the presence of peat, it's depth and the presence of any spoil/waste materials that would impact the restoration ability. Natural England advise that peat surveys should be carried out in line with the IUCN peatland programme [field protocol](#).

Prosperous Economy

Policy EC1 Scale Economic Growth

We advise the local plan addresses how nature recovery can support a strong economy both directly and indirectly. For instance, directly through capital generated by Biodiversity Net Gain (BNG) delivery and indirectly via the provision of greenspaces, thus improving air quality and reducing stress on health services.

Policy EC2: Employment Allocations Chorley

Natural England identifies that the proposed allocation is situated on deep peat. Natural England do not support the principle of developing on restorable peat. Consequently, we advise that further information is required to determine if restorable peat is present. We advise policy wording reflects the safeguard of deep restorable peat and provides tailored habitat opportunities.

Policy EC3: Employment Allocations Preston

EC3.3 must also consider impacts to Red Scar and Tun Brook Woods Site of Special Scientific Interest (SSSI). This designated site contains the largest areas of deciduous woodland in the county with a rich ground flora and other notable flora. The woods support good populations of bird, badger, white letter hairstreaked butterfly and oak bush cricket. More information is available at [Designated Sites View](#).

Policy EC9: Skills and Economic Inclusion

Demand for green jobs is increasing as industries prepare themselves for a greener future and net zero and welcome the existing reference. Encouraging investment in green skills and jobs will help to future-proof employment for a changing world, where there will be increasing opportunities in green energy and the environmental sector. We advise that further consideration should be given to encouraging investment in green jobs/skills as a means of reducing unemployment and encouraging economic growth and investment.

Policy EC14: Priorities for Tourism and the Visitor Economy

Natural England advise this section interlinks with Policy EN7 Designated Sites for Nature Conservation due to potential recreational disturbance at pertinent designated sites.

Healthy and Inclusive Communities

Policy HC1 (Strategic Policy) – Health and Wellbeing

Nature and access to nature are integral to the Local Plan and can help to ensure that the planning system genuinely delivers sustainable development that benefits people, places and nature and involves local communities in planning for the future of their areas. We strongly support the focus on making sure the planning system capitalises on opportunities to support the natural environment and respond to climate change. Connecting with nature is a key issue in accordance to Sections 120a and 180d of the NPPF. Consideration should be made to unequal access to natural green space and the needs of different user, age, and socio-economic groups. Therefore, Natural England recommend policy wording is updated to reflect the cross-theme issue.

We advise that reference to [Green social prescribing](#) (GSP) and BNG could be made as a source of funding/investment for improvements in parks and open spaces. GSP is the practice of supporting people in engaging in nature-based interventions and activities to improve their mental health, whilst offering nature recovery benefits.

Policy HC5 Provision of new Open Space, Sport and Recreation Facilities

The Plan evidence base should include a robust and up-to-date assessment of open space requirements and opportunities, with policies and proposals to remedy deficiencies in greenspace provision, including through land allocation.

In assessing greenspace provision, consideration should be given to the quality and accessibility of space, as well as the various uses that may need separate provision such as children's play space, opportunities for connecting with nature, formal sports areas and facilities for groups with a variety of needs. Open space provision can use [Natural England's Accessible Greenspace Standards](#) to determine needs based on size, proximity capacity and quality. The Plan should identify, designate and have policies to protect and enhance areas of Local Green Space that are of particular importance to local communities.

High Quality Environment

Natural England support the recognition of the natural environment, the effects of climate change and access to nature within this section. We welcome the bespoke nature of reflecting local guidance such as Lancashire Walking and Cycling Infrastructure Strategy, and other local design codes to respond and enhance local character and distinctiveness, incorporating nature and Green Infrastructure (GI).

The Plan should have policies to maintain and improve access to nature and enjoyment of the countryside. Policies should be in place to protect and enhance public rights of way, access land and national trails. We advise policy wording should reflect protection, enhancement and better connections whilst also addressing unequal access to nature to support health and well-being outcomes. The design of new or improved routes should consider a range of modes of access including walking, cycling and horse riding, as well as a range of users including children and older people, different socio-economic groups and people with disabilities.

Policy EN5: Green Infrastructure

We welcome Policy EN5 that seeks to protect, enhance and manage Central Lancashire Green Infrastructure network which is bespoke and tailored. The GI network should seek to ensuring areas of the network are protected and enhanced, as well as deliver a range of natural capital benefits.

Natural England's [Green Infrastructure Framework](#) provides evidence-based advice and tools on how to design, deliver and manage green infrastructure (GI). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone,

wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the [15 Green Infrastructure Principles](#). The Green Infrastructure Standards can be used to inform the quality, quantity and type of green infrastructure to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate. GI mapping resources are available [here](#) and [here](#). These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Natural England advise the blue infrastructure networks listed can also support and align with other natural environment policies, such as those on sustainable drainage systems.

Policy EN6 Biodiversity Net Gain

Natural England support the commitment to BNG and its links to Local Nature Recovery Strategies and the Nature Recovery Network. We recommend policy wording also reflects cross theme issues of ecological connectivity and climate change resilience. This may include Development should prevent impacts to the natural environment and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures, which is in line with the NPPF (paragraph 187d).

Noting Land at Harrison's Farm is to be considered for off-site habitat banking, we recommend a safeguarding policy could identify what form of development would or would not be appropriate in this area in line with the NPPF (para 187a).

The Plan should also aim to achieve wider environmental gains, going beyond BNG, to include wider natural capital benefits such as improved water and air quality and recreation. Natural England's [Environment Benefits from Nature tool](#) can help to identify opportunities.

Policy EN7 Designated Sites for Nature Conservation

We welcome proposals to protect and enhance biodiversity, including designated nature conservation sites (internationally, nationally and locally designated sites of importance for biodiversity), alongside habitats contained within Local Nature Recovery Strategy. All designated sites play an important role in the wider ecological network and for nature recovery.

Specific direct and indirect impacts of proposed development on designated sites should be considered within this section. Impacts may include changes in water quality and the impacts on air quality from increased traffic, intensive agriculture or industrial developments.

Many of the European Sites within the Plan area will require assessment of FLL and we support the clear provision of guidance which outlines buffer distances for development which will be required to undertake further detailed bird survey. In some Plan areas, strategic mitigation solutions may exist or be desirable to address the cumulative impacts of development on designated sites e.g. recreational pressures. Where this is the case, further advice should be sought from Natural England and robust evidence will be needed to support any strategic approach. In alignment with our comments made on the HRA, we advise Liverpool Bay Special Protection Area (SPA) is removed from the table.

The Plan should also make explicit reference to geological conservation (including local geological sites) and the need to conserve, interpret and manage geological sites and features in the wider environment.

We support reference to supporting the delivery of the Lancashire Local Nature Recovery Strategy and highlight the [Nature Recovery Network](#). They are designed as tools to encourage more coordinated practical and focused action and investment in nature. LNRS aims to help restore and connect habitats so that species can thrive; the process ensures local partners collaborate to agree

the priorities for the best activities and land locations to inform local nature recovery. We recommend considering the priorities for nature recovery alongside the mapped and unmapped actions set out in the draft Lancashire LNRS Strategy as useful evidential information.

Policy EN10: Development and Flood Risk

We highlight that this policy should also include reference to the opportunities presented by [nature-based solutions](#). Natural England advise that sustainable drainage systems can perform a range of functions including improved flood risk management, provision of accessible green/blue space, climate change adaptation and biodiversity enhancement. We signpost [Sustainable Drain Systems – Maximising the Potential for People and Wildlife](#) produced by the Royal Society for the Protection of Birds (RSPB) and Wildfowl and Wetlands Trust (WWT).

Policy EN14: Environmental Quality

Whilst this section, largely focuses on human receptors, Natural England highlight there are cross-theme issues with Policy EN7 Designated Sites for Nature Conservation.

Air Quality

Natural England applies a distance criterion of 10 km for designated sites which may be affected by changes in air quality. [APIS](#) holds data on air pollution in particular in relation to protected nature conservation sites. The Joint Nature Conservation Committee (JNCC) have published the [Nitrogen Decision Framework](#), which provides a means of attributing nitrogen deposition as a threat to, or cause of, unfavourable habitat condition on protected sites. You may wish to refer to [Air Quality PPG and Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations \(NEA001\)](#).

Noise/ Vibration/ Artificial Light

Operational and construction phases of development also have the potential to harm protected species and adversely affect designated sites and associated FLL which contain notified bird species. Development will need to demonstrate these impacts are suitably addressed through sensitive layout provisions and the use of a Construction Environment Management Plan (CEMP) as outlined.

Policy EN15 Areas of Green Belt

In line with NPPF 147, 150 and 151, plan policies and proposals should positively enhance land within the Green Belt. This should include compensatory improvements to environmental quality and accessibility of remaining Green Belt where land is removed from the Green Belt.

Green Belt land can often be degraded 'urban fringe' landscapes. Therefore, there will be opportunities to 'green' the Green Belt and deliver environmental benefits such as landscape enhancement, habitat creation and enhancement and improved access to nature.

Whilst we support the development of brownfield sites in policy EN15 (Point G), some brownfield sites are important for historic importance, wildlife and can be of high environmental value. Particularly invertebrate diversity. You may wish to refer to Open Mosaic Habitat Inventory as starting point for assessing environmental value: [Open Mosaic Habitat \(Draft\) - data.gov.uk](#) and [Brownfield land of environmental value in Planning Policy Guidance \(PPG\)](#). You may wish to update the policy wording to reflect the balance which must be met.

Policy EN16 Protection of Agricultural Land

We support the policy which seeks to protect Best and Most Versatile (BMV) agricultural land (Grades 1, 2, 3a) and avoid its loss. The Plan should recognise that development has an irreversible adverse impact on the finite national stock of BMV land. Any development proposed on BMV land should be informed by a detailed soil survey.

However, the Local Plan should also have a specific policy for the wider protection of and sustainable management of soils on development sites. This should set out mitigation measures to minimise soil disturbance and retain as many ecosystem services as possible through careful soil

management during the construction process and appropriate soil re-use. The Plan should recognise that development (soil sealing) has a major and usually irreversible adverse impact on soils. The impact of all types of development on soils should be considered.

Healthy soils are not only important for agriculture, but soils with high environmental value (e.g. wetland carbon stores such as peatland and low nutrient soils) are also important to ecological connectivity. Development should be supported by soils surveys and management plans - see [Defra's Code of Practice for the sustainable use of soils on construction sites](#).

We strongly support the consideration of deep peat within policy wording. Natural England do not support the principle of developing on peat and we do not support peat extraction.

Policy EN18 Areas of Separation

Policies for development in or adjacent to rural areas and urban fringe should ensure they reflect the character of the countryside, as well as seeking opportunities for enhancement and improved access to nature.

Policy EN19 Landscape Character

The Plan including site allocations, should give great weight to conserving and enhancing designated landscapes which include: National Parks, The Forest of Bowland National Landscape (Areas of Outstanding Natural Beauty). Development should reflect their natural beauty and special qualities (as identified in their Management Plans). Policies should help in furthering the statutory purposes of designated landscapes. Policies can be informed by landscape character and sensitivity assessments.

The scale and extent of development should be limited in these areas. The Plan should consider both the direct and indirect impacts of development on the designated landscape and its setting.

Policy should guide any development in these areas to meet the highest standards of design and environmental quality and seek opportunities to enhance the landscape and improve access to nature.

Natural England also advises that the Plan should set out a definition of major development to guide the determination of planning applications against the 'major developments test.'

Policy should also consider how development will be managed in the setting of a designated landscape, with development being sensitively located and designed to avoid or minimise adverse impacts.

In addition, the Plan should include a policy to reduce light pollution. Lighting can be harmful to wildlife and undermine enjoyment of the countryside or night sky, especially in intrinsically dark landscapes, such as protected landscapes and nature reserves. Where appropriate, the Plan should identify areas of tranquillity and include policies to protect them.

Climate Change and sustainable Energy

CC1 Climate Change

We welcome Policy CC1 that identifies the interlinking relationship between the natural environment and climate change. Designated sites and other biodiversity assets are likely to become more vulnerable to changes in air quality and without protection and resilience to climate change, they will become degraded and lost. Impacts may affect the ability of the natural environment to adapt to climate change, including its ability to provide adaptation for people. Species may also find it difficult to move through fragmented habitat.

The emissions associated to global warming and other harmful emissions such as dust, ammonia, nitrous oxides, sulphur dioxides and volatile organic compounds all have the ability to cause adverse effects. Planning policies and decisions should prevent unacceptable risk to designated sites from air pollution.

Natural England welcome reference to nature-based solutions. Many habitats provide essential ecosystem services to allow adaptation to climate change e.g. natural flood management, as well as

mitigation e.g. through tree planting and retaining peat as a carbon store. Nature-based solutions such as the rewetting of peat can be delivered by a network of multifunctional green and blue spaces and other natural features, which can deliver a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity, offering further opportunities for consideration.

Further information can be found at: [Climate Change Adaptation Manual, Carbon Storage and Sequestration by Habitat](#) and [National biodiversity climate change vulnerability model](#).

Specifically, we highlight that peatlands are England's largest terrestrial carbon store, containing hundreds or even thousands of tonnes of carbon per hectare. Their importance for climate change mitigation has been reviewed in detail by Natural England in Gregg et al, 2021: see [Carbon Storage and Sequestration by Habitat 2021 - NERR094](#).

Excavating and draining peat leads to high emissions of greenhouse gases. Degraded state of peatlands has made them the largest source of emissions of greenhouse gases to the atmosphere from land use in the UK, exceeding carbon uptake in forests. More information can be found within the [Implementation of an Emissions Inventory for UK Peatlands](#). Consequently, peat should be clearly reflected within the policy wording.

Habitats Regulations Assessment

Natural England notes that the Habitats Regulations Assessment (HRA) has not been produced by your authority, but by LUC. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. We provide the advice enclosed on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority.

Natural England notes that your authority, as competent authority, has undertaken an appropriate assessment of the proposal in accordance with regulation 63 of the Conservation of Species and Habitats Regulations 2017 (as amended). Natural England is a statutory consultee on the Appropriate Assessment stage of the Habitats Regulations Assessment process.

Your Appropriate Assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur, we generally concur with comments made. However, we strongly recommend that the Appropriate Assessment is amended to align with our comments below regarding the Liverpool City Region (LCR) recreation mitigation strategy. Natural England must be reconsulted on any amended Appropriate Assessment.

Mitigation and Recommendations

We outline our comments on the proposed mitigation and recommendations within the Appropriate Assessment:

Policy EN7: Designated Sites for Nature Conservation

Natural England agree with comments made under Section 5.35 to include wider consideration of Morecambe Bay and Duddon Estuary SPA and Morecambe Bay Ramsar site and Martin Mere SPA and Ramsar site within Policy EN7: Designated Sites for Nature Conservation.

We also support further detailed bird surveys for potential allocated sites which require further investigation at planning permission stage.

Noise, vibration and lighting disturbance of functionally linked land

Natural England support the provision of a Construction Environment Management Plan (CEMP) or equivalent and support its inclusion within policy wording. However, we highlight that the mitigation

hierarchy must be followed and avoidance of impacts through suitable design strategy and location should be explored first. This must be clearly reflected in the wording of associated policy.

Recreational Disturbance

Natural England welcome the commitment within Section 5.2 of the HRA to work with neighbouring authorities and Natural England regarding the ongoing recreational disturbance work around Morecambe Bay Habitat Sites. However, we advise this work is still in its early stages, and the progress of this work and your Local Plan timescales may not align. Therefore, you may wish to remove the wording of having the commitment '*before the Local Plan is adopted*'.

We advise having the correct policy hook which demonstrates that you will accept the future outputs of the Morecambe Bay work will be sufficient. This approach has been undertaken elsewhere such as the East Hampshire 2014 Local Plan, which was adopted before the wider strategic work for the Solent SPA, SAC and Ramsar (which resulted in Birds Aware Solent) progressed. This policy was accepted by the Examiner in this instance:

The East Hampshire Policy stated: '*To help protect the Solent SPA, SAC and Ramsar sites along the coast, the Council will work with local authorities to monitor the progress of ongoing assessments and recreational management studies being undertaken by the Solent Forum on these sites. Planning permission will only be granted for development that responds to the emerging evidence from the Solent Disturbance and Mitigation Project, the published recommendations, and future related research.*'

We also support the provision of open space, playing grounds and green infrastructure as highlighted in HS5 – Open Space and Playing Pitch Requirement and EN5 – Green Infrastructure. You may wish to explore options for contributions to open space provisions as further mitigation options. In addition, you may wish to consider the design of open space provisions to reflect larger designated areas for off-lead dogs, circular recreational routes diverting from the coast and notice boards to raise awareness of the sensitivities of the designated sites.

Natural England advise a strategic approach for Sefton Coast Habitats Sites may not be necessary in this instance and advise removal. We advise that Liverpool Bay SPA is removed from the Screening and Appropriate Assessment stage. Consequently, we advise that the participation within Liverpool City Region recreation mitigation strategy is not required.

Water Quality

Surface run-off (which can also contain contaminants such as hydrocarbons), septic tank and package sewage treatment plant discharges can contribute to elevated nutrients and changes in water quality at designated sites. Eutrophication occurs when there are excessive nutrients such as phosphorus and nitrogen in a waterbody causing certain species to grow rapidly. This causes the quality of water to decline, damages habitats and consequently the loss of more vulnerable and specialist species.

We concur with comments made under Section 5.56. Policy EN10 – Development and Flood Risk advises development must not have an adverse effect on water capacity and water quality with additional protection provided within EN11 – Water Resource Management and EN12 – Protecting Groundwater Source Protection Zones.

For potential allocations, we would also advise a suitable CEMP or equivalent document is produced which safeguards designated sites. The potential allocations will need to consider surface run off during construction and operational phases. We advise the above policy wording secures

these measures and details the relevant proposed allocations. Natural England support measures listed for non-allocated sites.

We advise that Ribble and Alt Estuary SPA and Ramsar *may* have the potential to be affected by changes in water quality at the following proposed allocations: SS3, SS4, SS6, HS2.6, HS2.16, HS2.17, HS2.21, HS2.23, HS2.24, HS3.1, HS3.2, HS3.4, HS3.5, HS3.9, HS3.11, HS3.12, HS3.13, HS3.14, HS3.15, HS3.17, HS3.18, HS3.19, HS4.2, HS4.6, HS4.7, HS4.8, HS4.9, HS4.10, HS4.11, HS4.12, HS4.15, HS4.16, HS4.17, HS4.18, HS4.19, HS4.20, HS4.21, HS4.22, HS4.23, HS4.24, HS4.26, HS4.27, HS4.28, HS4.29, HS4.30, EC3.1, EC3.4, SS5, EC4.1, EC4.2, EC6.1, HC3.2, HC3.4, HC3.6, HC3.8 and HC3.9.

Central Lancashire Integrated Assessment Scoping Report, Dated January 2025

We offer the following comments on the main themes within our remit:

Chapter 3 – Sustainability Context

Baseline Information

Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to the plan area:

- Green and Blue infrastructure strategies
- Local Nature Recovery Strategies
- Biodiversity plans and strategies
- Rights of Way Improvement Plans
- River basin management plans
- National Landscape and National Park management plans.
- Relevant landscape plans and strategies

Please see the attached Annex A for our advice on sources of local plan evidence on the natural environment which was updated in 2024.

Key sustainability issues and likely evolution without the plan

We highlight that the document has focussed upon key sustainability issues but has not included reference to areas of opportunity which can also influence decision making and policies. We strongly recommend amendment is made.

Table 3.1 Key sustainability issues for Central Lancashire and likely evolution without the new Local Plan

Accessibility: We advise the relevant IA objectives reflect IA11: Biodiversity and Geodiversity and policies referring to green infrastructure. We wish to emphasise designated sites and other biodiversity assets are likely to become more vulnerable to changes in air quality and without protection and resilience to climate change, they will become degraded and lost.

Quality of life: The relevant IA objectives must also include IA11: Biodiversity and Geodiversity and policies referring to Green infrastructure. Consideration should be made to unequal access to natural green space and the needs of different user, age, and socio-economic groups.

Economy: We advise that further consideration should be given to encouraging investment in green jobs/skills as a means of reducing unemployment and encouraging economic growth and investment. We suggest consideration of the relationship between environmental and economic sustainability issues. Investment in green jobs and skills, such as in habitat creation and

management, and in wildlife surveying and monitoring will also contribute to environmental issues.

Natural Environment: We welcome the alignment of relevant IA objectives to include IA10: Air quality & IA11: Biodiversity and geodiversity. However, you must consider the relationship between the natural environment with Green Infrastructure and climate change resilience. We would advise reference to the specific statutory designated sites.

Land and natural resources: Natural England recommends the relationship between land and natural resources and IA11: Biodiversity and geodiversity and climate change resilience is included.

Whilst we welcome reference to Best and Most Versatile (BMV) land, we advise further consideration of any soils of high environmental value (e.g. wetland and carbon stores such as peatland, low nutrient soils; or soils of high environmental value in the local context) in light of their role in ecological connectivity.

Natural England support reference to the carbon storage that peat can provide. This extends to wider peat assets, and we advise an amendment is made. Peat can play an important role in carbon storage and climate change resilience. However, when lost or degraded it can emit greenhouse gases.

Natural England do not support the principle of developing on peat and wish to see this reflected in Local Plan policy. We believe peatlands should be protected from inappropriate development for their carbon store and habitat value. The baseline situation should include the mapping of peat presence which can be found at [Peaty Soils Location, Natural England Open Data Publication](#).

Whilst we support the development of brownfield sites, Natural England highlight some brownfield sites are important for historic importance, wildlife and can be of high environmental value. Particularly invertebrate diversity. Update to the table is required to reflect the balance which must be met.

The IA framework: Table 3.2 Integrated Assessment framework for the Central Lancashire Local Plan

Natural England advise this section of the report is largely generic and not specific to the Local Plan area. We advise further consideration of wider relationships between the natural environment.

IA3: Ensure that there is sufficient coverage and capacity of transport and utilities to support growth and development

Natural England recommends that appraisal criteria/sub objectives be added to demonstrate commitment to designated sites such as '*will air quality improve or have an insignificant effect on designated sites and other biodiversity assets?*'

IA6: Support improved health and well-being of the population and reduce health inequalities

We strongly recommend assessment criteria is created which references connecting people with nature and enhancing provisions of recreational resources & assets. Should baseline information indicate specific regions or group users which require more support or access this must be considered.

Assessment criteria may include *will it create, maintain or enhance local green space provision?, will it create an accessible open space for those groups identified as having deficient access?, will it create or enhance open space in areas which are deficient?, will it avoid impacts on the quality and extent of existing recreational assets, such as formal or informal footpaths?*

IA10: Improve air quality

Certain development proposals can affect the ability of the natural environment to adapt to climate change, including its ability to provide adaptation for people. Species may also find it difficult to

move through fragmented habitat. As such, Natural England recommend that assessment criteria are added to demonstrate commitment to designated sites such as *will air quality improve or have an insignificant effect on designated sites and other biodiversity assets?*

IA11: Conserve and enhance biodiversity, green infrastructure and geodiversity assets

This section of the table requires amendment to ensure all natural environment issues and opportunities are addressed. This should be tailored to the Plan area.

We advise that this section could be strengthened by referring to the challenging issue which are specific to the designated sites. When referring to European and nationally designated sites, you may wish to draw on more detailed information on specific features from [Designated Sites View](#), the [Conservation Objectives](#) and [Site Improvement Plans](#). Further information at [Designated Sites View](#) (<https://designatedsites.naturalengland.org.uk/>) and Natural England's Impact Risk Zones (IRZ) on [MAGIC](#) maps (www.magic.defra.gov.uk) can identify potential development impacts.

The Local Plan should aim to identify and pursue opportunities for securing measurable net gains for biodiversity. This should include setting a percentage target level of provision of at least 10% net gain, higher targets should be supported by evidence.

In order to strengthen this section, we recommend the following assessment criteria:

- *Will it protect, create and enhance the borough's biodiversity, geodiversity, and wildlife habitats in line with mandatory 10% Biodiversity Net Gain?*
- *Will it protect and promote effective management of designated sites?*
- *Will it align with Local Nature Recovery Strategy (LNRS)?*
- *Will it encourage enhancement and restoration of designated wildlife sites, habitats and species and protected and unique geological features?*
- *Will it promote the protection and recovery of priority species and habitats?*
- *Will it ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not compromised?*
- *Will it provide habitat connectivity?*
- *Will it provide opportunity to restore and reconnect peat based habitats?*
- *Will it remove an irreplaceable habitat or asset?*

You may wish to consider green infrastructure under a separate IA objective. Our suggested assessment criteria coincide with comments made under IA6.

Natural England's [Green Infrastructure Framework](#) provides evidence-based advice and tools on how to design, deliver and manage green infrastructure (GI). GI mapping resources are available [here](#) and [here](#). These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

IA12: Ensure communities, developments and infrastructure are resilient to the effects of climate change

This IA should also extend to the natural environment to reflect the proposed assessment criteria. The role of nature-based solutions should be referred to within this section.

The Local Plan should consider climate change adaption and recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition, factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. Green Infrastructure and resilient ecological networks play an important role in aiding climate change adaptation.

IA13: Reduce the risk of flooding to people and property

Sustainable urban drainage systems can be designed to have wildlife enhancing measures and the link to the natural environment should be made. You may wish to consider this within the assessment criteria.

IA14: Protect and improve the quality and availability of water resources

Our water remit focusses on ensuring that habitats and designated sites are protected from water-related development impacts, which may also extend beyond a development's boundary (including peat-based habitats).

Increased nutrients (including nitrogen and phosphorus) can cause eutrophication in fresh waters and estuaries. This causes harm to water dependent sites and wildlife. Excessive nutrients can come from wastewater, farming pollution & industrial processes. This can place sites in unfavourable condition, this means the area is not being adequately conserved and qualifying features of the site are not meeting targets. We also highlight the importance of nature based solutions.

We suggest the following assessment criteria: *will it minimise the risk of pollution arising from new development?, will it encourage water efficiency and promote the use of grey-water recycling / rainwater harvesting?*

IA15: Increase energy efficiency, encourage low carbon generation and reduce greenhouse gas emissions

We strongly recommend assessment criteria are created for peat. *This may include will it protect peat resources? Will it result in the loss of peat? Will it result in the enhancement of peat?*

IA16a: Conserve and/or enhance landscape, townscape, in addition to the local character and distinctiveness of the CLLP area

Designated landscapes should be given great weight to conserving and enhancing designated landscapes such as Areas of Outstanding Natural Beauty (AONBs). These can be informed by landscape character and sensitivity assessments. We are also aware that the Forest of Bowland is in the process of creating a new 5 year Management Plan for the AONB, using recently published guidance. We advise you should have regard for this emerging Management Plan throughout your plan preparation, to ensure that your plan is based on the most up-to-date information.

Natural England strongly support the emphasis on beauty, placemaking, access to nature and good design. Nature and green infrastructure are integral to creating and maintaining high quality, beautiful places and should be fully embedded into local design codes.

We would also expect reference to National Character Areas ([NCAs](#)) within the assessment criteria.

You may wish to consider expect associated assessment criteria of *will it protect, maintain and enhance local character and distinctiveness?, will it lead to further light pollution?, will it affect areas of tranquillity?, will it follow design codes?*

Plan policies and proposals should all positively enhance land within the Green Belt. This should include compensatory improvements to environmental quality and accessibility of remaining Green Belt where land is removed from the Green Belt. Green Belt land can often be degraded 'urban fringe' landscapes. Therefore, there will be opportunities to 'green' the Green Belt and deliver environmental benefits such as landscape enhancement, habitat creation and enhancement and improved access to nature. As such we would expect associated assessment criteria.

IA18: Promote sustainable consumption of resources and support the implementation of the waste hierarchy

We recommend the following assessment criteria: *will it safeguard existing supply of natural resources?, will it encourage a reduction in the amount of waste produced?, will it encourage increased recycling and composting and achieve the diversion targets for waste away from landfill?, will it result in improvement in the management of fly tipping?*

Natural England would support an assessment criteria question which committed to no future peat extraction as a commercial operation.

Chapter 8 - Monitoring

Natural England welcome that that each IA objective has a proposed monitoring indicator. However, some measures appear to be more generalised. Bespoke indicators should be chosen relating to the outcomes of development management decisions. Natural England highlight monitoring indicators must quantify the success of the sustainability objectives and criteria. Typically, indicators are specific, measurable, accepted, realistic and time bound.

As set out in [Planning Practice Guidance](#), you should be monitoring the significant environmental effects of implementing the current local plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117). Whilst it is not Natural England's role to prescribe what indicators should be adopted, we have provided example monitoring indicators in the sections below.

IA6: Support improved health and well-being of the population and reduce health inequalities

Other general monitoring indicators may include: percentage of people who will utilise social prescribing; percentage increase of local green spaces; percentage of the plan areas population having access to a natural greenspace within 400 metres of their home; length of greenways constructed; hectares of accessible open space per 1000 population; number of new and retrofitted urban green infrastructure, such as living roofs, living walls, planters.

IA10: Improve air quality

Monitoring indicators may include: Recognising the value of nature-based solutions, such as: Number of trees planted, Hectares of flood plain; Percentage increase in green space; Area within plan area enhanced through Biodiversity Net Gain; Hectares of peat engaged in restoration efforts; Hectares of trees planted and enhanced; Number of tonnes of NOx emitted annually from road transport.

IA11: Conserve and enhance biodiversity, green infrastructure and geodiversity assets

Monitoring indicator examples include: number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance; percentage of major developments generating overall biodiversity enhancement; net gain in biodiversity using the DEFRA metric.

Green infrastructure general monitoring indicators may include: percentage of people who will utilise social prescribing; percentage increase of local green spaces; percentage of the plan areas population having access to a natural greenspace within 400 metres of their home; length of greenways constructed; hectares of accessible open space per 1000 population; number of new and retrofitted urban green infrastructure, such as living roofs, living walls, planters

IA12: Ensure communities, developments and infrastructure are resilient to the effects of climate change

Monitoring indicators may include: Recognising the value of nature-based solutions, such as: Number of trees planted, Hectares of flood plain; Percentage increase in green space; Area within plan area enhanced through Biodiversity Net Gain; Hectares of peat engaged in restoration efforts; Hectares of trees planted and enhanced; Number of tonnes of NOx emitted annually from road transport.

IA14: Protect and improve the quality and availability of water resources

Monitoring indicators may include: number of planning applications which have met net neutral aims, percentage of relevant development incorporating SUDs and water quality/ecological status of rivers.

IA15: Increase energy efficiency, encourage low-carbon generation and reduce greenhouse gas emissions

Monitoring indicators can include: hectares of peat in restoration; number of planning applications on peat; hectares of peat lost or retained.

IA16a: Conserve and/or enhance landscape, townscape, in addition to the local character and distinctiveness of the CLLP area

We advise monitoring indicators include reference to AONBs, NCAs, light, tranquillity and design codes.

IA18: Promote sustainable consumption of resources and support the implementation of the waste hierarchy

Monitoring indicators may include: tonnage of waste diverted from landfill; number of recycling facilities.

Please send further correspondence to consultations@naturalengland.org.uk.

Yours faithfully

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