

Appendix 2: Central Lancashire Biodiversity SPD Consultation Responses

Respondent	Summary of Response	Central Lancashire Authority Response	Proposed Amendment
<p>Lancashire County Council</p>	<p>Local Flood Risk Lancashire County Council is the Lead Local Flood Authority for Lancashire (LLFA). The Flood and Water Management Act (FWMA) sets out the requirement for the LLFA to manage "local" flood risk (surface water, groundwater and flooding from ordinary watercourses) within their area. It is advised that flooding from "local" sources is taken into consideration, where possible, and especially where there is a known flooding issue in an area. The Lancashire and Blackpool Local Flood Risk Management Strategy was formally adopted on 9 April 2014 and is a material consideration during plan making.</p> <p>SuDS Approval Body (SAB) Comments Under Government proposals, approval will be required for the drainage design on any new development for which a full planning approval is submitted to the Local Planning Authority which meets the requirement criteria of 10+ dwellings or greater than 0.5 hectare from the date of implementation. The LLFA strongly promote Sustainable Drainage Systems (SuDS) to be incorporated within the design of a drainage strategy for any proposed development, applying the SuDS management train. The LLFA encourages that site surface water drainage is designed in line with the current draft National SuDS Standards, including restricting developed discharge of surface water to greenfield runoff rates making suitable allowances for climate change and urban</p>	<p>The Central Lancashire authorities note that Lancashire County Council is the LLFA and acknowledge that the Lancashire and Blackpool Local Flood Risk Management Strategy is a material consideration during plan making.</p> <p>The role of SuDs is recognised in paragraph 86 of the SPD, but the text is proposed for amendment to give greater emphasis to the important role that SuDs can play.</p> <p>It is acknowledged that Local Planning Authorities (LPAs) can have a major role in delivering and achieving the objectives set out in the Water Framework Directive and Bathing Water directive. This</p>	<p>Delete the existing bullet point in paragraph 86 relating to SuDs:</p> <ul style="list-style-type: none"> ● Using Sustainable Drainage Schemes so that drainage infrastructure also acts as biodiversity habitat and contributes to the ecological network <p>Insert a new paragraph 88 with the following text in Section F on the Enhancement of Sites (all following paragraphs to be renumbered sequentially):</p>

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	<p>creep, managing surface water as close to the surface as possible and prioritising infiltration as a means of surface water disposal where possible. Regardless of the site's status as greenfield or brownfield land, LCC encourages that surface water discharge from the developed site should be as close to the greenfield runoff rate as is reasonably practicable.</p> <p>Given the purpose of this SPD, SuDS are considered to be especially important in creating new and enhancing existing wildlife sites, particularly soft engineering SuDS features such as ponds, swales and wetlands. It is advised that the SPD acknowledges the potential impact SuDS can have in forming links with the wider ecological network to create a coherent 'blue infrastructure' of water habitats in Lancashire; SuDS can go a long way in helping to deliver such an aspiration.</p> <p>Water Framework Directive 2000 and Bathing Water Directive 2006 The European Water Framework Directive (WFD) came into force in December 2000 and became part of UK law in December 2003. The WFD considers the ecological health of surface water bodies (good status being defined as a slight variation from undisturbed natural conditions), as well as achieving traditional chemical standards. It provides an opportunity to plan and deliver a better water environment, focussing on ecology, through river basin management planning. The Bathing Water Directive (BWD) 2006 was introduced to safeguard public health and clean bathing waters, and</p>	<p>SPD, in tandem with relevant Core Strategy and Local Plan policies (including Core Strategy Policy 29 on Water Management), aims to ensure that development does not have a negative impact on biodiversity and ecological network resources; good water quality is fundamental to these resources.</p> <p>The Water Framework Directive is listed in Section B of the SPD that deals with the Legislative Framework. There is no reference to the Bathing Water Directive in the document but additional text relating to this Directive is proposed for Section B.</p>	<p><u>Sustainable Drainage Systems (SuDS) can create new and enhance existing wildlife sites, particularly soft engineering SuDS features such as ponds, swales and wetlands. They can form links with the wider ecological network to create a coherent 'blue infrastructure' of water habitats in Lancashire. SuDS are encouraged within the drainage strategy of proposed developments and the positive impact that they can have for biodiversity and for ecological networks should be taken into account in scheme design.</u></p> <p>Insert the following to Section B: Legislative Framework in the Key Legislation section:</p> <ul style="list-style-type: none"> • <u>The Bathing Water Directive 2006:</u> <u>This aims to safeguard public health and clean bathing waters. One mechanism of doing this is through the planning and development process to ensure that new developments do not pose a threat to water quality whilst enhancing the quality of our habitats for wildlife.</u>

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	<p>stricter controls for testing of bathing water quality will be introduced from 2015. The BWD requires the monitoring and assessment of bathing waters and authorities must inform the public about bathing water quality and beach management, through the so-called bathing water profiles, in their area.</p> <p>Local government has a major role in delivering and achieving the objectives set out in the WFD and BWD and to help the natural and modified environment adapt to the impacts of climate change . One mechanism of doing so is through the planning and development process to ensure that new developments do not pose a threat to water quality whilst enhancing the quality of our habitats for wildlife.</p> <p>It is recommended that the Local Planning Authority has regard for the WFD and BWD in developing this SPD. The employment of SuDS, if and where possible, is strongly encouraged to help achieve water quality benefits and the LLFA advises that this is reflected accordingly.</p>		
<p>Dr Arthur Earnest Smith</p>	<p>There is little regarding pollinators and the role they play, or how they can be encouraged at low cost. Pollinator numbers have declined substantially over recent years, but with good flora their numbers can recover and there has been an increase in bumble bees over the past two decades. However, observation suggests that there is still insufficient food flora.</p> <p>To encourage pollinators suitable flora are needed throughout the season. Not all plants/flowers can provide nectar to pollinators. Encouraging a season long range of nectar rich flora in wildlife corridors has the potential at a low cost to increase pollinator numbers greatly benefiting</p>	<p>Comments noted.</p> <p>Additional text proposed to be added to section F in the section on the Enhancement of Sites to relate to pollinators.</p>	<p>Insert the following text in a new paragraph 89 in Section F in the section on the Enhancement of Sites (all following paragraphs to be renumbered sequentially):</p> <p><u>Pollinators, such as bees, provide an essential service of pollinating flowers and crops, whilst providing other benefits for native plants and the wider environment. Planting schemes should include and retain</u></p>

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	flora and fauna diversity. Perhaps some consideration of the needs of pollinators can be a component of future planning.		<u>suitable flowers, shrubs and trees that provide nectar and pollen as food for bees and other pollinators throughout the year. Further useful information on catering for the needs of bees and other pollinators can be found in the National Pollinator Strategy: for bees and other pollinators in England (November 2014).</u>
RSPB	<p>Would like to commend us in respect of the SPD, but would urge more to be done, particularly in terms of biodiversity enhancement which at present only gets a brief mention in the section – Designing development to conserve and enhance biodiversity.</p> <p>Take the view that the current text undersells the potential for enhancement, there is much more that can be done. State that Exeter City Council have produced an excellent Residential Design (Biodiversity) SPD, which sets out to developers the measures that they can take to integrate biodiversity into built developments.</p> <p>Within Lancashire, Ribble Valley has already taken on board many of the principles within the Exeter document. They would like the Central Lancashire authorities to specifically adopt the provision for both swift and bat bricks and suggest some wording that could be incorporated.</p>	<p>Additional text is proposed in the Enhancement section relating to Sustainable Drainage Systems and to pollinators.</p> <p>Additional text is proposed relating to nesting and roosting boxes and other built fabric additions.</p>	<p>Add additional text to the following paragraph 86 bullet point:</p> <ul style="list-style-type: none"> • Making provision on new buildings for species such as bats, swallows, barn owls and other species that might live locally. <u>This could include, but is not limited to, nesting and roosting boxes to be built as part of the fabric of the building for building reliant birds (e.g. swift, swallow and house martin) and bats and birds associated with urban areas such as house sparrows and starlings.</u>
Highways Agency	Having reviewed the draft SPD, we have no specific comments to make.	Comments noted.	No amendments
PWC Surveyors	Act on behalf of many clients who would be affected by the Lancashire Ecological Network (The Network) designations (including corridors and stepping stones)	The SPD provides more detailed advice and guidance in relation to the application	Delete the following text in paragraph 28: A more detailed summary of the

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	<p>throughout Central Lancashire. Comments relate to the methodology behind the Network designations and the mapping exercise.</p> <p>It is agreed that the Networks should be identified, preserved, restored and recreated to ensure existing sites of biodiversity importance are linked and in accordance with the National Planning Policy Framework. However, the initial Ecological Network Maps that have been produced show completely arbitrary corridor and stepping stone locations. I cannot find any justification or detailed methodology for the designations, apart from a short inadequate explanation within paragraphs 25 – 28 of the consultation paper.</p> <p>Paragraph 28 states that a more detailed summary will be published at a later date. This detailed methodology and explanation of designations needs to be available for scrutiny prior to publishing the final SPD and maps. At present the draft maps show large areas that have no reasoned boundaries. Publication of such unjustified designations will result in unnecessary, unreasonable delays to the planning system whilst specialist ecologist opinion is sought, which the government is clearly attempting to prevent as stated within the National Planning Policy Framework and the National Planning Guidance.</p> <p>In conclusion, a detailed assessment showing why areas identified within the maps are important to identified Core Areas should be carried out and available to view in</p>	<p>of adopted Core Strategy Policy 22: Biodiversity and Geodiversity and the relevant Local Plan policies of the individual authorities.</p> <p>These policies set out that ecological network resources will be protected, conserved, restored and enhanced, in accordance with the Framework.</p> <p>The consultee comments relate to the methodology behind the Network designations and the mapping exercise.</p> <p>The SPD provides guidance for applicants in terms of understanding the relevant Central Lancashire policies and what is required as part of the planning application process for a range of biodiversity issues, including Ecological Networks. The purpose of the consultation was to seek views on the approaches suggested.</p>	<p>development of the Lancashire Ecological Network will be published at a later date.</p> <p>Replace with:</p> <p><u>More detailed information on the Lancashire Ecological Network is contained within the ‘Lancashire Ecological Network Approach and Analysis’ Document.</u></p> <p>Delete the following text in paragraph 35:</p> <p>The Ecological Network mapping can be viewed on the Lancashire County Council website at http://mario.lancashire.gov.uk/agsmario/ (not available yet)</p> <p>Replace in paragraph 36 with:</p> <p><u>The Ecological Network mapping can be viewed on the individual authority websites.</u></p> <p>Amend the text in paragraph 48 as follows:</p> <p>The Lancashire Ecological Network mapping will be made available to view on the Lancashire County Council website at http://mario.lancashire.gov.uk/agsmario/</p>

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	<p>another consultation period prior to publishing the SPD.</p>	<p>The purpose of the consultation was not to consult on the Ecological Network mapping for the identified habitat groups, or the detailed methodology behind the mapping. There is no need to undertake a further consultation period prior to publishing the SPD.</p> <p>Further information on the Lancashire Ecological Network is published in the 'Lancashire Ecological Network Approach and Analysis' Document. This is proposed to be referred to in the document</p> <p>The Ecological Networks are not plan allocations. This is a SPD and does not include a Policies Map. The Policies Map can only be amended through the formal Local Plan process.</p> <p>The Ecological Network mapping for each authority is no longer proposed to be made available on the Lancashire County Council</p>	<p>(not yet available)- <u>The Ecological Network mapping can be viewed on the individual authority websites.</u> These maps should be assessed before an application is submitted in order to ascertain whether proposals fall within one of the networks (currently identified for Woodland and Scrub, Grassland, Wetland and Heath).</p>

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		<p>Mario website. The mapping for woodland and scrub, and grassland habitats for each authority will be published on the individual authority websites.</p>	
<p>The Wildlife Trust for Lancashire, Manchester & North Merseyside</p>	<p>State that HM Government has now archived Natural England's website and that the links in paragraphs 8 & 9 are no longer available. A summary of nature conservation legislation & regulation within the UK can still be found on the United Kingdom's Joint Nature Conservation Council (JNCC) website.</p>	<p>Noted. Text proposed to be changed to refer to the JNCC website, rather than the Natural England website.</p>	<p>Delete the following text in paragraph 8:</p> <p>A list of legislation covering wildlife and the countryside can be found on Natural England's website or by following the link http://www.naturalengland.org.uk/...</p> <p>Replace with the following text:</p> <p><u>A summary of nature conservation legislation and regulation within the UK can be found on the United Kingdom's Joint Nature Conservation Council (JNCC) website, at http://jncc.defra.gov.uk/page-1359</u></p> <p>Delete the following text in paragraph 9:</p> <p>Details of the species which are protected under the various pieces of legislation can be found on the Natural England website at http://www.naturalengland.org.uk/ourwork/planning...</p>

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	<p>A basic guide to prospective developers' responsibilities to statutorily protected species in England may be found on the www.gov.uk website.</p> <p>It would also be useful to include a table of 'Priority Species' occurring within Central Lancashire, perhaps in draft Appendix 2, following on from that for 'Priority Habitats'.</p>	<p>Additional text proposed to be added to refer to the guide to prospective developers' responsibilities.</p> <p>Whilst a list of priority species could be useful no definitive list for Central Lancashire has been found. This section of the SPD refers specifically to 'protected' species, rather than Priority Species. Additional text proposed to refer to priority species.</p>	<p>Replace with the following text:</p> <p><u>A summary of species protection and legislation in the UK can be found on the United Kingdom's JNCC website, at http://jncc.defra.gov.uk/page-1747</u></p> <p>Insert the following additional text at the end of paragraph 9:</p> <p>A basic guide to the role of Local Planning Authorities and the responsibilities of developers to statutorily protected species in England can be found at https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals</p> <p>Insert the following new paragraph after paragraph 9 to relate to priority species :</p> <p><u>Priority species were those that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (BAP). The UK Bap was succeeded by the UK Post 2010 Biodiversity Framework in July 2012. Further information on priority species can be found on the United Kingdom's JNCC website, at http://jncc.defra.gov.uk/page-5717</u></p>

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	<p>In terms of the Lancashire Ecological Network: This section describes clearly how the network has been /is being identified and section 9 does refer, in paragraph 39, to the restoration and enhancement of ecological networks so that intention is also clearly there. As the corridors themselves contain significant areas of land of limited ecological value, inclusion within the corridor is an indication that that land should be considered to be of higher priority for restoration than land not included; though, of course, this does not preclude habitat improvements to land outside the identified network. However, we would wish to see a little more emphasis on the opportunities for restoration and creation of linkages in the network and have made a number of suggestions about this in the following comments.</p> <p>Point out syntax error in pre-application text.</p> <p>At present, if a site doesn't contain any important habitats / designations it seems to us that the applicant might reasonably assume that there aren't any other biodiversity considerations (other than a desire to enhance biodiversity generally). This is why we think it is important that, if there are any areas where there is a need for new connectivity to be created, then these should be clearly shown on a map; preferably the proposals map but, failing that, one associated with this SPD. Hopefully, all the</p>	<p>Comments noted. The pre-application text is proposed for amendment in line with the comments made.</p> <p>This is an SPD and does not include a Proposals Map. The Proposals (Policies) Map can only be amended through the formal Local Plan process.</p>	<p>Delete the following text in box dealing with the Pre-application process in the Dealing with Ecological Issues in the Planning Process flowchart</p> <p>Applicant to establish whether any biodiversity considerations and commission surveys and assessments where needed in line with advice in this SPD</p> <p>Replace with the following text:</p> <p><u>Applicant to establish whether any biodiversity considerations apply, including opportunities for improvements and additions to the ecological network, and to commission surveys and assessments where needed in line with advice in this SPD.</u></p>

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	<p>definitive maps may be available in time for publication of the approved draft; though we're all too aware of the capacity constraints we're all under.</p> <p>However, we suggest the <i>text</i> would be more immediately improved by amending the diagram's leftmost box's text to read: "Pre-application: Applicant to establish whether any biodiversity considerations apply, <u>including opportunities for improvements and additions to the ecological network</u>, and to commission surveys and assessments where needed in line with advice in this SPD."</p> <p>There is no reference in this figure/diagram to legal agreements. There will be cases where any biodiversity measures and network links would best be secured, in terms of provision, management and maintenance, by means of a s106 agreement. This should be mentioned as a possibility in this figure so that potential applicants will be aware that it may be required.</p> <p>In view of our earlier comments, an ecological assessment would also be needed where the proposed development would affect an area identified for improving or creating a new network connection. This section covered by paragraphs 43 and 44 needs to reflect this. We suggest adding text to paragraph 43 as follows (or similar): "Many planning applications have the potential to impact in some way on biodiversity; through the direct loss of habitats and species, and/or the reduction in the value of</p>	<p>Text proposed for amendment in line with comments.</p> <p>Include reference to legal agreements in figure text.</p> <p>Text proposed for amendment in line with comments.</p>	<p>Add the following text to the flowchart:</p> <p>Approval may be granted with appropriate conditions <u>and, in some cases, subject to obligations under a legal agreement, if appropriate</u></p> <p>Insert the following additional text to paragraph 44:</p> <p>Many planning applications have the potential to impact in some way on biodiversity; through the direct loss of habitats and species, <u>and/or the reduction in the value of habitats and their abilities to support the species that depend on them; and/or through the destruction,</u></p>

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	<p>habitats and their abilities to support the species that depend on them; <u>and/or through the destruction, degradation, maintenance, enhancement, restoration and/or even creation of local ecological network functionality</u>. It is essential that the <u>potential positive and negative impacts of a proposal on biodiversity</u> are considered before a development scheme is designed and before a planning application is submitted.”</p> <p>Enhancement of Sites (Paras 83 – 86) Comment: These paragraphs contain some good wording but don't reflect need or opportunity to create new connectivity. We suggest amending paragraph 85 as follows: "... <u>and even to create new links</u>".</p> <p>State that obligations under a s106 agreement (where appropriate) should be referred to as well as planning conditions.</p> <p>Where a proposed development site's 'red line' abuts a 'Primary Feature' of the network but the applicant does</p>	<p>Text proposed for amendment in line with comments.</p> <p>Text proposed for amendment to refer to obligations.</p> <p>Text proposed for amendment in line with comments.</p>	<p><u>degradation, maintenance, enhancement, restoration and/or even creation of local ecological network functionality</u>. It is essential that the <u>potential positive and negative impacts</u> of a proposal on biodiversity are considered before a development scheme is designed and before a planning application is submitted.</p> <p>Insert the following additional text to paragraph 86:</p> <p>Developers should look to design in opportunities to improve habitats for biodiversity conservation, and to increase the overall quality of the development by enhancing existing habitats or creating new areas appropriate to the wider landscape <u>and even to create new links</u>.</p> <p>Insert the following additional text to paragraph 90:</p> <p>Ecological conditions will be attached to planning decisions <u>and in some cases, if appropriate, subject to obligations under a legal agreement</u>.</p> <p>Insert the following additional text to paragraph 76:</p>

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	<p>not propose it for maintenance or enhancement or offer mitigation – perhaps because it is not on land within the applicant’s control - it would seem useful to seek some provision for “buffering” within the red line to reduce the risk of secondary impacts, <i>e.g.</i> such as occurs to the quality of semi-natural woodland adjacent to housing development through dumping of garden spoil, accidental or deliberate introduction of invasive horticultural species, increased predation by domestic pets &c.</p> <p>The nature and suitability of such buffering would depend on the type of development, the type of habitat(s) and the species supported, and the extent and local context so it’s not possible to be generically prescriptive: ecological advice would need to be sought.</p> <p>The following paragraphs of the NPPF are apposite: 109 - <i>“including by establishing coherent ecological networks that are <u>more resilient</u> to current and future pressures”;</i> 114 – <i>“planning <u>positively</u> for the creation, <u>protection</u>, enhancement and management of networks”</i> 117 – <i>“and <u>areas identified</u> by local partnerships for habitat restoration or creation”.</i></p> <p>The <u>emphases</u> are ours.</p> <p>If our proposal be accepted, paragraphs 75-76, under “Harm Avoidance”, would seem the most suitable location for a little extra text to address this. We suggest: 75. The objective is for proposals to avoid harm to habitats and species. Preferably this should involve locating on an alternative site with less harmful impacts. Harm can also be avoided by measures such as reducing the scale of development and / or providing buffering, or locating</p>		<p>Harm can also be avoided by measures such as reducing the scale of development <u>and/or providing buffering</u>, or locating development to an alternative part of the site.</p>

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	development to an alternative part of the site.		
Marine Management Organisation	No specific comments to make but would like to draw attention to their planning remit	Comments noted.	No amendment.
Bretherton Parish Council	Bretherton Parish Council support the contents of the SPD and where reassured that the importance of the issues of biodiversity and conservation are recognised.	Comments noted.	No amendment.
English Heritage	Thank you for consulting English Heritage on the above document. At this stage we have no comments to make on its content.	Comments noted.	No amendment.
Susan Fox	<p>I should like to make the following comments in relation to the Biodiversity & Nature Conservation Supplementary Planning Document:-</p> <p>B. LEGISLATIVE FRAMEWORK. The Hedgerow Regulations (1997) should be added to, and included in, the list.</p> <p>C. PLANNING POLICY The National Planning Policy Framework (NPPF) states clearly that the three aspects of 'sustainable development, economic, environmental & social. are of equal importance and that net gains for nature must replace loss of biodiversity during any development through mitigation. & compensation.in order to ensure that wildlife foraging grounds and habitats are not adversely affected and wildlife species will continue to thrive during and after development.</p>	<p>Comments noted.</p> <p>The Hedgerow Regulations will be added to the list.</p>	Add the Hedgerows Regulations (1997) to the list of Legislative Framework.
Fylde Council	Fylde Council confirms that it supports in principle the	Comments noted.	

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	<p>draft Biodiversity and Nature Conservation SPD. Set out in the correspondence below are more specific comments on the content of the document.</p> <p>Sections A (Introduction), B (Legislative Framework) and C (National and Local Planning Policy) Fylde Council welcomes the detailed and comprehensive legislative and policy background provided in the first three sections of the document. It would also be helpful if there was a cross reference in Section A to the wording in paragraph 15 of the accompanying Screening Document, i.e. <i>“The SPD is unlikely to have any significant effect on a SPA or SAC, above and beyond any significant effects that the Core Strategy or Local Plans are likely to have, either individually or in combination with other plans and projects. Therefore, the SPD will not trigger the need for an Appropriate Assessment.”</i></p> <p>Section D: (Designated Sites) It is considered that Section D could be enhanced by the provision of more site specific information such as a list of all of the Internationally, Nationally and Locally important sites (i.e. the hierarchy of sites) situated within Central Lancashire. It is also considered that some of the key characteristics and features of these specific sites could be described in a contextual summary, or in a table, together with their implications for the planning process.</p> <p>Fylde Council in particular would wish to see more detail provided on the Ribble and Alt Estuaries Special Protection Area (SPA), particular given its international importance for</p>	<p>An amendment to Section A has been proposed in line with the suggested text.</p> <p>It is not considered appropriate or necessary to include a list of all sites across the Central Lancashire area, as such as list is always likely to be subject to changes.</p> <p>The importance of the Ribble and Alt Estuaries are recognised by the authorities.</p>	<p>Amend bullet point at paragraph 20 to add: <u>The SPD is unlikely to have any significant effect on a SPA or SAC, above and beyond any significant effects that the Core Strategy or Local Plans are likely to have, either individually or in combination with other plans and projects. Therefore, the SPD will not trigger the need for an Appropriate Assessment</u></p>

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	<p>biodiversity and the substantial size of the area designated which encompasses several Local Authorities, (including Fylde).</p> <p>As Fylde and South Ribble share a boundary in the middle of an internationally important Biodiversity Area (the Ribble and Alt Estuaries SPA), Fylde Council wish to continue working together on cross boundary issues as part of the council's duty to co-operate with Neighbouring Authorities.</p> <p>It is also considered that more information could be provided as to the particular characteristics of the Central Lancashire area as a whole compared to other local authorities. Information could be included, such as how Central Lancashire features of Biodiversity Importance compare to other areas in terms of scale and importance and what the distinguishing features and characteristics of the Central Lancashire area are with regard to Biodiversity and Nature Conservation.</p> <p>Section E (The Lancashire Ecological Network) Fylde Council welcomes reference in Section E to the Lancashire Ecological Network. Is there a typographical error in the second bullet point of paragraph 30, with the reference to Biological Sites of Special Scientific Interest? Should the bullet point read: <input type="checkbox"/> Biological Sites of Special Scientific Interest?</p> <p>Section F (Biodiversity and the Planning Application Process) The information in Section F provides clear and robust</p>	<p>It is not considered necessary to go into detail about specific sites in the SPD.</p>	<p>The second bullet point will be amended to remove reference to biological.</p> <p>The Yes/No Arrows will be corrected in the flowchart in section F.</p>

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	<p>advice to developers and landowners when submitting planning applications, where there are biodiversity considerations. However, the flow chart – ‘Dealing with Ecological Issues in the Planning Process’ – needs re-visiting in terms of the ‘Yes’ / ‘No’ down arrows and the text in the box which says “Proceed to determination” needs amending.</p> <p>Pagination It is considered that the accessibility and usability of the document could be enhanced with the addition of a contents page and page numbers. The addition of page numbers would make it easier to quote certain sections and to pinpoint relevant information. In addition, the appendices do not have paragraph numbers to help identify where a particular paragraph is located.</p> <p>concluding comments Fylde Council supports the approach taken by the Central Lancashire Authorities in the Biodiversity and Nature Conservation SPD. It is considered that the SPD provides clear, helpful and robust advice in terms of the national and local policy perspective, together with guidance for applicants preparing planning applications. However, it is considered that the SPD would benefit from the inclusion of more site specific information, such as a list of all of the Internationally, Nationally and Locally important sites (i.e. the hierarchy of sites) situated within Central Lancashire, so as to make the document more focussed on the biodiversity of Preston, Chorley and South Ribble.</p>		<p>Page numbers and a contents page will be added.</p>

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<p>Natural England</p>	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England strongly supports the production of a Biodiversity SPD that aims to prevent the loss of biodiversity and where possible to enhance biodiversity.</p> <p>What is the Lancashire Ecological Network It is very encouraging to hear that ecological networks are being mapped as this will highlight any gaps or opportunities for the most effective enhancement, this will be a very useful tool and can help developers produce the most appropriate mitigation packages.</p> <p>F. Biodiversity and the Planning Application Process Would it be possible for the flowchart to reflect enhancement opportunities?</p> <p>The Lancashire Ecological Network Mapping – Natural England strongly support the statements in this paragraph and believe this is an assured method for preventing the loss of biodiversity. The mapping exercise and ensuring it is used as described here is the key to success.</p> <p>In general, Natural England are of the opinion that this document could be improved by including a current picture of the sites/species/habitat/landscape of this area and maybe some maps to demonstrate this.</p> <p>Screening document for Strategic Environmental Assessment and Habitats Regulations Assessment We have no comments to make in relation to this document.</p>	<p>Comments noted.</p> <p>It is not considered necessary to amend the flowchart, however, alterations are to be made to the document to expand the enhancement section.</p>	<p>Add additional text to the following paragraph 87 bullet point:</p> <ul style="list-style-type: none"> • Making provision on new buildings for species such as bats, swallows, barn owls and other species that might live locally. <u>This could include, but is not limited to, nesting and roosting boxes to be built as part of the fabric of the building for building reliant birds (e.g. swift, swallow and house martin) and bats and birds associated with urban areas such as house sparrows and starlings.</u>

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<p>Environment Agency</p>	<p>Consultation</p> <p>Thank you for consulting with us on the above Supplementary Planning Document (SPD) which we have considered and have the following comments to make:-</p> <p><u>Green Infrastructure</u></p> <p>The SPD makes no connection to other local plan policies that seek to protect and increase Green Infrastructure resources. The protection and enhancement of the interconnected network of green and blue spaces such as green roofs, parks and gardens, playing fields and allotments, beaches, watercourses and wetlands, river corridors, woodlands, grasslands, trees, hedgerows will provide multiple benefits and services to people and the environment and so they will link back to the biodiversity and nature conservation policies.</p> <p>In relation to our remit, they can provide benefits such as flood risk management (flood storage, swales), water management (surfaces for infiltration and storage) and habitat creation (river corridors) and we would recommend that this overlap between different policies is referred to in the document to ensure developers and the public are aware of these links and can take account of them as necessary.</p> <p><u>Water Framework Directive</u></p> <p>There are a number of Water Framework Directive (WFD)</p>	<p>There is a section on relevant local plan policies in the SPD. It is not considered to be appropriate to list every relevant policy in the SPD, however, a list can be added to the appendices. Policies would still be a material planning consideration even if they weren't specifically referred to in the document itself.</p> <p>The Water Framework Directive is listed in Section B of the SPD that deals with the Legislative Framework.</p>	<p>Expand the list of relevant environmental policies in Appendix 1.</p>

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	<p>waterbodies in central Lancashire and as such the applicant / developer should refer to the 2nd cycle River Basin Management Plans (RBMPs) and Flood Risk Management Plans (FRMPs) that are currently out for consultation.</p> <p>They should ensure that the proposed development will not result in the deterioration of the water body status and seek opportunities to improve the water body status if it is at less than 'good ecological status (GES) or good ecological potential (GEP).</p>		