



The Barn, Berkeley Drive, Bamber Bridge, Preston, Lancashire, PR5 6BY  
**T:** 01772 324129    **E:** [info@lancswt.org.uk](mailto:info@lancswt.org.uk)    **W:** [www.lancswt.org.uk](http://www.lancswt.org.uk)

10<sup>th</sup> June 2024

FAO Karen Allott  
Clerk to the Council

Dear Ms Allott

**RE: LANCASHIRE WILDLIFE TRUST COMMENTS ON THE DRAFT SADDLEWORTH  
NEIGHBOURHOOD PLAN**

Thank you for consulting the Lancashire Wildlife Trust on the above document. Our comments and observations regarding the consultation are outlined below.

The Trust welcomes and supports the plans commitment to protecting and enhancing the parish's biodiversity resource and protecting important landscapes. However we would like to see more specific references to the enhancement of the parish's biodiversity resource and how the plan can help to reverse current biodiversity declines. Our more specific comments regarding the draft plan are detailed below.

**ISSUES:**

**Environment:**

The Trust agrees with the assessment that the biggest threat to our way of life is climate change and damage to the environment. The plan should therefore reference the twin crises of both the climate change emergency and the biodiversity emergency we are currently facing. Both these critical issues need to be embedded throughout each section of the plan.

**PLAN VISION:**

The vision should include that the parish becomes an area with a flourishing natural environment that is resilient, sustainable and well connected and that enables the free movement of wildlife through and across the parish.

Whilst we would agree that achieving, simultaneous and carefully balanced progress in pursuit of economic, social and environmental objectives is important, the twin crises of biodiversity and climate change, highlighted as the biggest threat to our way of life within the issues section must therefore be placed at the forefront of current policy thinking. Climate change and biodiversity should be intertwined within all policy decisions. We feel that the biodiversity resource held within the parish should also be highlighted as one of its major strengths.

## PLANS AND LEGISLATION:

### The Environment:

***OBJECTIVE 1: To ensure that development maintains green belt purposes and protects and enhances green spaces.***

#### *Policy 1: Green Infrastructure*

The Trust agrees with and welcomes this policy. We especially welcome the requirement for development to provide additional areas of open green space and pocket parks where required in addition to protecting and enhancing the existing natural environment and wildlife corridors. This is important, as without additional green infrastructure (GI), existing open green spaces could become subject to conflicting usage and this might have an adverse impact on the biodiversity of the open spaces. We would also suggest that policy should also ensure that development minimises the impact on the openness of local landscapes. Large open landscapes have an importance in their own right and are valued as such by the local community. Greenbelt land is especially important in this respect and whilst the main policy function of greenbelt is to maintain separate identities to settlements and prevent urban sprawl, the plan should recognise that these larger open areas have the potential to support valuable wildlife assets, such as ground nesting birds.

We welcome the intent to have a positive impact on the relationship between urban and natural features and this approach should help to sustain wildlife features post development. The Trust would draw attention to and recommend initiatives such as the Wildlife Trusts Building with Nature (BwN) project. This is a voluntary code of practice that is agreed with developers and offers an assessment and accreditation service to secure the delivery of high quality green infrastructure in new and existing communities. It can be used to certify a development or can award accreditation to policy documents for those councils seeking independent validation of the quality of their policy in relation to delivery of high-quality GI. BwN serves as a national exemplar of a standard to be expected in the context of development and green infrastructure, including biodiversity. As the first UK green infrastructure benchmark, BwN is increasingly being recognised, within local and national government and across the built-environment sector, as the “go-to” standards framework for GI. This approach will ensure that nature is interwoven in to the fabric of Saddleworth’s infrastructure.

The Trust welcomes the commitment for development to ensure and support the movement of wildlife. We would urge that the provision of GI and open green space should be informed by and contribute to the emerging Greater Manchester Local Nature Recovery Strategy and future ecological networks.

***OBJECTIVE 2: To promote and encourage the stewardship and conservation of a beautiful and locally distinctive rural landscape in a period of changing climatic and economic conditions***

#### *Policy 2: Character and quality of land adjacent to the National Park –*

We agree with and welcome this policy but would like to see reference to the Dark Peak Site of Special Scientific Interest (SSSI) within this policy section. Whilst there are references to the Impact Risk Zones (IRZ) and the Habitat Risk Assessment (HRA) elsewhere within the plan, the need to risk assess development in terms of the potential impact on the SSSI would seem to be pertinent to this policy.

#### *Policy 3: Conversion of Agricultural Buildings (Barn Conversions)*

We agree with and support the requirement to carry out ecological surveys. We do however feel that specific mention should be made to the potential impacts on protected species such as bats. The sentence *'developments should consider incorporating green infrastructure to support biodiversity and preserve existing wildlife'* should be strengthened and *'consider'* should be replaced with *'should'*.

#### *Policy 4: Protection of Important Views*

The Trust welcomes and supports this policy.

*Paragraph 38: Policies 2, 3, 4 and 5 are responses to particular issues in Saddleworth. Policies in other plans also apply to Saddleworth.*

Given the biodiversity emergency we are facing we would recommend that there needs to be a specific biodiversity objective with nature conservation policies highlighted. Local biodiversity planning is vital if borough and regional targets are to be met and this is especially true for biodiversity planning. The phrase think global act local being particularly relevant. Currently within the plan, the ecological information is rather scattered, for instance SSSI and SBI protection appears to come under Policy 4: Protection of Important Views.

Within the biodiversity objective, reference should be made to the now mandatory requirement for development to deliver at least a 10% net gain in biodiversity. The Wildlife Trust's believe that this target is however set too low and a minimum requirement of 20% should be called for. Development proposals will need to be accompanied by a 30-year management plan that identified how biodiversity is to be maintained and enhanced. Development must show how the BNG principles and the mitigation hierarchy have been followed, specifically how they have avoided and minimised habitat loss, enhanced and created biodiversity within the development site and as a last resort compensated for the loss of biodiversity within the site. Only once a rigorous avoidance and mitigation plan has been demonstrated, should off-site compensation be acceptable. Off-site areas should be chosen in line with local priorities for nature recovery. The neighbourhood plan could identify specific local habitats and species that would benefit from off-site delivery of BNG. This could include degraded peatland sites and fen habitats within the parish boundary.

It is important to note that BNG is a purely habitat based assessment/metric. The metric does not provide for the protection and/or enhancement of species. Many of our native species are undergoing significant and alarming declines. Whilst the protection and repair of habitats under BNG can help to safeguard some species and improve the function of ecosystem for species, we feel that there needs to be specific action through the planning system that helps to reverse species population declines and drive forward the recovery of Section 41 priority species across the borough. This is especially important for species that require support/actions that are either not reliant on a particular habitat or are reliant on multiple factors across a range of habitats. The upcoming GMLNRS has a specific species sub-group that is developing a list of species that might require specific action/protection outside of the habitat enhancement that can be delivered through BNG. NPPF (2023) states that *'Plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity'*. The requirements for S41 species protection/enhancement needs to be a material consideration when assessing biodiversity impacts of development. Protection policies for species should sit alongside mandatory biodiversity net gain to provide additional opportunities to not only protect but also halt and reverse the decline of S41 priority species. The neighbourhood plan could provide/identity local species that are either local rare or are locally iconic for Saddleworth.

*Paragraph 43: Tree coverage and peatlands*

We agree and welcome this strategy. There should be encouragement away from intensive agriculture to a more sustainable and wildlife friendly landscape. As part of this would be the move towards wetter farming and foodstuffs that are grown in a more sustainable way. This would be especially important on peat soils and would help to contribute to a low carbon economy. The plan should reference the upcoming ELMS funding from Defra to help farms provide multiple benefits to wildlife and people through the development and delivery of nature based solutions and eco-system services.

*Paragraph 49:*

We welcome that priority is given to the preservation of peatlands and would recommend extending this to all peat soils. We would also caution that tree planting should not adversely affect open country species such as Lapwing and Curlew. Sensitive habitats and species that favour open country should also be prioritised (even below 250m) to ensure that the right tree is planted in the right place.

*Paragraph 50:*

The wording '*the protection of these is taken into account whenever planning is being considered*' is not strong enough and there should be a presumption against the loss of ancient woodland cover. Ancient woodland is listed within the NPPF as an irreplaceable habitat. Only in exceptional circumstances and where a bespoke compensation plan has been agreed should development lead to the loss of ancient woodland cover.

As discussed above, the information of SSSI/SAC and SBIs should be included within a separate ecology/biodiversity section.

*Paragraph 62:*

It is important to stress that the protection of biodiversity within the parish is not solely reliant on the protection of designated sites. Priority and irreplaceable habitats can occur outside of sites such as SSSI's and SBI's. Where irreplaceable habitats are present, these should be given the highest protection. Irreplaceable habitat is defined in national planning policy as habitats, which would be very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen. The Trust feels that peat deposits underlying agricultural grasslands that are capable of restoration to peat bog should come under the definition of degraded bog. Given the timescale for the development of peat soils, we feel that these soils should also be viewed the same as irreplaceable habitats. It should be noted, that the list of irreplaceable habitats is to be reviewed and policy must be adaptive to include any future additions. Irreplaceable habitats cannot be compensated for through the BNG process and it needs to be stated that development that results in the loss of irreplaceable habitat should be refused and only permitted under exceptional circumstances and where bespoke compensation has been agreed.

***OBJECTIVE 3: To protect and enhance the environment, and ensure that development adequately addresses flood risk, and promotes sustainability.***

*Policy 5: Erosion and Flooding*

The Trust welcomes and supports making use of nature-based solutions as the best approaches to alleviating flood risk. Working with the natural processes and adopting a natural flood management approach to slow the speed of water drainage and intercept water pollutants is the most efficient and cost effective way of mitigating flood risk. Where practical, rivers and watercourses should be

returned to a more natural state. New development should therefore avoid watercourses being culverted and where possible existing culverts should be removed. SUDs features should also deliver multiple benefits such as delivering biodiversity objectives.

Within development plans, we would welcome the requirement for a holistic site-wide drainage strategy, as this should lead to better and more joined up thinking on flood risk management. Water should be retained within SuDS infrastructure for as long as possible and should be as close to greenfield run-off as possible. Applicants for major development must be supported by a sustainable drainage strategy and accompanied by drainage management and maintenance plans, which should consider the designs for maintaining/increasing water quality, water quantity and run-off rates, amenity provision and biodiversity enhancement. We would strongly recommend that new development needs to be sited away from flood risk areas and a presumption against development in the flood plain. We welcome the acknowledgement that protecting and enhancing peat bogs can help to slow the flow of surface water as well as increasing tree cover and the creation of water holding features.

We also recommend that planning policy should seek to reduce hard non-porous surfaces within development, with applications that seek to maximise porous surfaces looked on favourably.

#### *Policy 6: Sustainable Construction*

With regard to sustainable energy provision, we would strongly suggest that windfarm development on deep peat soils should be refused. Peat soils function as a carbon sink and when rewetted and restored they help to combat and mitigate climate change.

## **Design**

### ***OBJECTIVE 4: To ensure the sustainable design and construction of all new development.***

#### *Policy 7: Design, Character and Heritage*

GI should also be designed to mirror the local habitat and local biodiversity priorities. Please see our comments regarding the Building with Nature project outlined within Policy 1 above.

#### *Policy 14: Derelict and Empty Properties and Sites*

Whilst we would in general agree that Brownfield sites should be prioritised for development, we would suggest that the plan recognises that this should be, on a case-by-case basis and that some brownfield sites can support a wealth of biodiversity interest within an urban environment and can be particularly important for invertebrate communities. This interest needs to be protected and enhanced. Brown-field sites can also act as key ecological corridors and stepping-stones contributing to a coherent and resilient ecological network and it should be made clear within planning policies that appropriate assessment of the biodiversity interest and the sites potential importance within the local nature recovery strategy needs to be made before development is considered appropriate

#### *Policy 18: Tourism and Leisure*

Whilst we agree and support the benefits of increasing tourism within Saddleworth, the policy should include protective measures to ensure that there is no undue disturbance to sensitive landscapes/habitats or species. We recommend an additional criterion: Development does not lead to increased disturbance to sensitive habitats or species. Where development is within the IRZ of the Dark Peaks SSSI then a HRA will need to be undertaken.

*Policy 19: Agricultural Land*

We would recommend that the part peat soils can play in mitigating against climate change should be highlighted here. Dry and degraded, peat soils emit carbon and greenhouse gasses, when rewetted, they act as a carbon sink and can sequester carbon from the atmosphere, mitigating the effects of climate change. In line with England's Peat Action Plan, all uses of peat soils should keep the peat wet and in the ground. Development adjacent to peat soils should seek to protect and rewet peat soils as part of any mitigation/compensation plan.

*Paragraph 145:*

Partnership activities should also include farm diversification and could reference the upcoming ELMS funding from Defra to help farms provide multiple benefits to wildlife and people. Through nature based solutions. There should also be reference to the potential biodiversity and climate change benefits of promoting wetter farming and paludiculture farming practices, especially important in relation to peat soils.

I hope that the above information and comments prove useful. If you require further information or clarification, please do not hesitate to contact me.

Regards

MC Walker (signed electronically)

Martyn Walker  
Conservation officer for Greater Manchester  
Email: [mwalker@lancswt.org.uk](mailto:mwalker@lancswt.org.uk)  
Tel: 07894386671