



Contact: Mark Cassidy
Email: dm@lancaster.gov.uk
Website: www.lancaster.gov.uk
Our Ref:



Lancashire County Council
Environment & Planning

FAO: Local Nature Recovery Strategy Team
By Email

Planning & Climate Change Service

PO Box 4
Town Hall
Lancaster
LA1 1QR
DX63531

XXXX 2025

Dear Sir/Madam,

DRAFT LOCAL NATURE RECOVERY STRATEGY CONSULTATION

Thank you for your letter of 26th June regarding the above.

Lancaster City Council welcomes the opportunity to comment on this consultation and recognises the importance of the Lancashire Local Nature Recovery Strategy (LNRS) in the recovery and enhancement of the natural environment across the County. The Strategy provides the first document which truly puts nature first, identifying important habitats and species and the measures that should be put in place to strengthen their future. It recognises the challenges that nature faces but also the many opportunities that the County has for nature recovery and the wider benefits that its recovery can play, for example in relation to health benefits, carbon capture and climate change, water and air quality improvements and flood management.

As drafted the Strategy provides a consistent basis for identifying priorities across the County and will be fundamental in supporting the City Council and other partners to secure funding and direct action to those areas where most improvements can be made.

Lancaster City Council supports the Strategy, its overall aims and the priorities set out and measures to achieve them.

The Council does have a few comments to make, set out below, which are in support of the LNRS or are minor points that can be addressed for the final version. The purpose of these comments are to further strengthen the role and focus of the document in terms of the actions it seeks to deliver.

Methods and data

Greater clarity is requested on the methods followed in identifying the areas for improvement across the different habitat types. It is recognised that each layer has been influenced by several data sources, some of which includes data provided by this Council, and that opportunities for the expansion and linking of habitats has influenced the mapping presented. While this is supported, Lancaster City Council requests that additional information is provided on both the data sources used and the assumptions that have been applied. From involvement in the development of the LNRS we understand that this will be addressed in a separate Evidence and Technical Information document. This information will support confidence in the robustness of the mapping, something which will be important when taking layers forward into local plan policies and development management decisions.

The rationale for selection of target species should be provided, because the choice includes both rare species and others that are more widespread but are taken to be indicator species. It is expected that this will be set out in the supporting technical evidence.

The ambitions around improving data and evidence is supported by the Council. The deficiencies in some types of information and coverage within the County is a notable issue for Lancashire. Opportunity to address such deficiencies are therefore supported, this includes the development of a State of Nature report for the County.

Opportunity areas and ecological network

The LNRS map guide states that Areas that could become of Importance are *"mapped here as opportunity areas where effort should be concentrated to carry out potential measures or actions to restore habitat, to achieve the most for biodiversity and the wider environment."* The Council supports the representation of ecological network modelling with land parcels rather than generalised model flows.

The text on the Local Habitat Map (p130) explains this approach well. Areas mapped are considered to have the best opportunities for nature recovery, based on best available datasets, and should therefore be prioritised. Nonetheless, Lancaster City Council would not want landowners and managers to be deterred from carrying out measures that support delivery of the priorities in nearby suitable areas. We consider this to be important for ecological networks. Not all landowners and managers with land in the mapped areas will wish to take up the opportunities identified, but there may be suitable alternatives for habitat connectivity (e.g. woodland creation) that could provide benefits additionally, or instead of some of the areas mapped.

Recreational access

The LNRS includes as one of the 'universal' priorities: Access to nature is provided whilst minimising recreational impacts on sensitive sites, habitats and species populations. The Council supports this priority to minimise recreational impacts on sensitive sites and the recommendation for collaborative development of a Strategic Recreational Access Management Plan for the Morecambe Coast and Lune Estuary (p42). This is a known issue for Lancaster District and the Council is working with two neighbouring authorities to address this. A visitor survey is currently being undertaken to assist the Council in identifying the zone of influence under which visitors visit the Bay and the nature of their visit. This information will inform the Habitat Impact Assessment of the Local Plan and guide future actions to reduce existing impacts while still enabling the societal benefits of public access to the coast. Measures to address this through the LNRS are supported.

Future changes in response to climate

The strategy does not appear to make any explicit provision within the included coastal and estuarine measures for the predicted sea level rise over the next 50 – 75 years. As many of these habitats are those most at risk from rising sea levels, it is suggested that provision is included for forward planning in this regard, to help these habitats survive the coming changes, and to move further inland where necessary. We note, however, that some areas in Flood Zone 3 have been identified as having opportunities for wetland and coast habitat measures and support this.

Minor errors and presentation

Management measure P5.1 (relating to upland peat) is phrased in such a way as to make it ambiguous as to the preferred method of management, particularly with regard to hydrology, burning, grazing and nutrient inputs. It should be made clear whether a reduction or increase is being suggested, and where it is not possible to specify, there should be clear instructions to seek professional advice before implementing any management practices that could cause irreparable harm to upland peat habitats.

As few people are familiar with roman numerals at high numbers, it is suggested that the footnotes are amended to a different numbering system.

The first paragraph on page 13 contains several typos.

The Priority and Measures tables (Table 5 onwards) have some measures highlighted in green. Presumably this is to show the mapped measures from unmapped ones, however this does not appear to be stated. Also some of the species measures, e.g. HH4 map not be readily mappable.

The table on page 57 appears to have a typo under the 'measures' section: C1.2. The description for these measures states the following: "*C1.2 – Remove or create pathways through barriers such as small...*" It is assumed that the term 'Remove or create' is a mistake, however if not then this should be amended for legibility.

An Evidence and Technical Information document – Appendix Ten is referenced in footnotes but not included in the strategy document. What are Appendices 3 to 10? It would be helpful to list the supporting document(s) in this report and include some links in the final version where the Appendices are held separately.

Further clarification is required on a specific site included on the draft habitat map, the site in question is a rocky habitat (Rocky: R3.1 – 367) identified at the end of Sand Lane, just outside the village of Warton. This site is known to have been previously used as a landfill, the Council presume this is why the site has gained this classification on the habitat map, however a high-level view of the satellite maps included within the LNRS mapping system seems to show no rocky or bare earth habitat remains in this location. It appears to be currently in use as a somewhat 'typical' grazed grassland. The Council are seeking therefore seeking clarification as to whether the R3.1 designation was intended for the site in its current state (pastureland), or whether the designation was mistakenly applied due to the site's history without regard for the land's current habitat type.

Conclusion

Lancaster City Council has also provided comments via the requested on-line survey pro-forma. The Council trusts that the responses provided in both this letter and the survey will be carefully considered by Lancashire County Council as it looks to finalise the LNRS for Lancashire.

Lancaster City Council commends the draft LNRS and looks forward to working with the County Council on the finalisation of the Strategy and on subsequent delivery of actions. We would be happy to discuss any of the points raised in this response if necessary.

Yours faithfully,

Mark Cassidy

MARK CASSIDY
CHIEF OFFICER – PLANNING AND CLIMATE CHANGE