

Appendix 1:

Lancaster City Council's response to the Forest of Bowland National Landscape Draft Management Plan consultation.

Lancaster City Council formal response (draft version)



Forest of Bowland National Landscape Management Plan 2026-2031 Public Consultation

* Required

1. Are you responding personally, or on behalf of an organisation? *

Personally

On behalf of an organisation

2. Which of the following **best** describes your point of view? *

Business

Conservation body

or NGO

Land

manager/farmer

Local

government

Local resident

Member of a
community group

Statutory body

Visitor to the area (live outside the National Landscape)

3. To what extent do you agree or disagree with the proposed **vision** for Forest of Bowland National Landscape? (see p.29 of the plan)

Strongly

agree

Agree

Neutral

Disagree

Strongly

disagree

4. Additional comments on the vision:

The Vision that the Forest of Bowland Management Plan provides is considered to be strong, clearly set out, and with detail included to be able to identify areas that will need docs for this to be achieved.

5. This Management Plan is built on a set of **core principles** which provide a framework to guide policy and practice in Bowland. Accepting these principles is essential to adopting and delivering the plan. Do you think we have identified all the relevant principles? (see p.29 of the plan) *

Yes

No

6. If you answered "No", please list any principles you think are missing, or provide suggestions for improving or clarifying the principles?

N/A

Please provide input to the Outcomes and Measures parts of the plan:

7. To what extent do you agree with the **outcomes** for **Landscape** (see p.33):

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

8. Please add any further comments about the **outcomes** for **Landscape**:

The Landscape theme focuses on conserving and enhancing Bowland's distinctive character, including its moorland fells, wooded valleys, and traditional farmed areas. Measures include restoring dry stone walls, hedgerows, and parklands; protecting skylines and dark skies; and ensuring new development respects local vernacular styles. Lancaster City Council are particularly pleased to see the focus on preserving dark skies. Lancaster has adopted specific local guidance its other National Landscape (Arnsdale & Silverdale National Landscape) in the form of the [Cumbria Good Lighting Technical Advice note](#), and Lancaster aims to have a similar level of guidance for the Forest of Bowland National Landscape through its Local Plan Review, which will also be inline with the Institution of Lighting Professionals (ILP) ['Bats and Artificial Lighting at Night Guidance note](#) (August, 2023).

9. To what extent do you agree with the **outcomes** for **Nature Recovery** (see p.39):

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

10. Please add any further comments about the **outcomes** for **Nature Recovery**:

Lancaster City Council considers that Nature Recovery is central to the plan and is therefore pleased to see that it is identified as one of the four central themes. The Management Plan addresses the urgent need to restore habitats and reverse species decline. Key outcomes of the Management Plan include bringing all remaining unrestored peatlands under restoration, expanding woodland and tree cover by 750 hectares by 2040, and safeguarding species-rich grasslands. Rivers and wetlands will be reconnected to floodplains and managed to improve ecological health. Champion species such as hen harrier, curlew, and black grouse will benefit from targeted conservation measures. Actions integrate climate adaptation strategies, such as enhancing hydrological function in peatlands and promoting resilient tree species. Collaboration with farmers and landowners is critical, supported by agri-environment schemes and green finance opportunities. These efforts contribute to national targets under the Protected Landscapes Framework and the global 30x30 commitment, which sees the UK having committed to protect 30% of land and sea for nature by 2030.

11. To what extent do you agree with the **outcomes** for **People** (see p.57):

Strongly agree

Agree

Neutral

- Disagree
- Strongly disagree

12. Please add any further comments about the **outcomes** for **People**:

Lancaster City Council is supportive of the 'People' theme's direction as it emphasises inclusive access, learning, and wellbeing, improves rights of way and creates accessible routes, supported by infrastructure such as all-terrain wheelchairs. The Council is supportive that the MP also sets out that educational initiatives will be used to engage schools, colleges, and lifelong learners, fostering skills in conservation and rural crafts. The Management Plan states that health and wellbeing programmes will assist in highlighting nature's therapeutic benefits, addressing barriers such as transport and cultural perceptions. Community engagement is integral to the plan, ensuring that diverse audiences can explore and appreciate Bowland's special qualities. These measures all collectively aim to strengthen the social contract between people and nature, promoting stewardship and resilience.

13. To what extent do you agree with the **outcomes** for **Place** (see p.68):

- Strongly agree**
- Agree
- Neutral
- Disagree
- Strongly disagree

14. Please add any further comments about the **outcomes** for **Place**:

Lancaster City Council is pleased to see that the Place theme addresses cultural heritage, regenerative tourism, and community vitality. Conservation of historic assets, ranging from prehistoric sites to vernacular architecture, is prioritised alongside adaptive reuse of redundant structures. The Management Plan sets out how regenerative tourism initiatives will reinvest economic benefits locally, promote experiences that are authentic to the Forest of Bowland area, and reduce environmental impacts through sustainable transport and visitor management. Community-focused actions include maintaining essential services, supporting volunteer networks, and fostering local enterprise. These strategies aim to create a resilient rural economy that complements environmental goals, to ensure that the Forest of Bowland National Landscape remains a living, working landscape with strong cultural identity.

15. Please use this final text box to share anything else you feel has not been covered or addressed in the plan:

The plan provides direction but is not spatial in its presentation. Some degree of spatial mapping may be beneficial to help to visually demonstrate the implications of the Management Plan. This could for example include mapping of the potential nature recovery opportunity areas, mapped tranquility zones, mapped dark-sky zones, mapped landscape

sensitivity areas, or mapped areas of potential woodland creation. A more specific spatial element to this would make it easier for Lancaster City Council to integrate the Management Plans aims into local policy through the Local Plan Review.

The draft Management Plan recognises issues such as congestion, parking overflow at honeypots and conflict on rural lanes, but doesn't give specific transport based solutions to these issues which could include 'on-demand' shuttle buses (such as 'dial-a-ride'/ app-based approaches).

The Management Plan recognised the opportunity to installation of small-scale renewables in the National Landscape however beyond referring how this could be tackled via community led section there is no other guiding principles and criteria for how this could be approached, including issues such as the need to assess viability, the impacts on grid infrastructure and also if there is potential for small-scale farm-based renewables which the City Council could look to incorporate into its Local Plan (evidence permitting).

The Management Plan also calls for 'sympathetic design' but offers no specifics around this. It is accepted that this will vary by site but further information around issues such as acceptable materials or guidance on conversions of rural building etc, as well as scale/massing threshold and lighting design criteria would be useful and could help feed into Local Plan policy. There are other National Landscape Management Plans in the UK such as the Cotswolds National Landscape Management Plan, Nidderdale National Landscape Management Plan, Arnsdale & Silverdale National Landscape Management Plan) which do provide more robust guidance around these issues.

In relation to visitor management the Management Plan acknowledges that the Forest of Bowland experiences stresses but doesn't offer ideas around solutions such as potential parking strategies, or visitor behaviour management (in relation to dogs, fires, wild camping for example) or any specific detail around the sustainable tourism transport network. More information round this would assist with Lancaster's ability to manage hotspots like the Trough of Bowland.

16. Would you like to comment on the **Climate Adaptation Plan**?

Yes

No

17. If yes, how far do you agree that the **Climate Adaptation Plan** covers the key issues and sets out the required measures to adapt to climate change?

Strongly agree

Agree

Neutral

Disagree

Strongly disagree

18. Please add any further comments about the **Climate Adaptation Plan**:

Page No.	Comments
4	<p>Local climate bullet points omit heatwaves</p> <p>°c should be °C with a capitalised C (this goes for the whole document)</p> <p>“In Lancashire the hottest summer day so far on record was 30.1°c in 2023” - LCC is not clear where this figure is from, but disputes its accuracy. Hazelrigg weather station near Lancaster recorded a peak of 35.2°C on July 19, 2022 and the temperatures in 2022 in general were the highest throughout the country.</p> <p>“Winter months in Lancashire usually see 16 days of rain and this is projected to remain the same in the 2 and 4°c scenario” – the met office offers a customised risk assessment for each district area in the UK which is based on their own UKCP18 data. This data shows that for the Ribble Valley district (which comprises most of the FBOW) that the very minimum increase in winter rainfall under 4 degrees of warming is 15% and could be as high as 24%. This data can be found here: Explore the Climate of your Local Authority. LCC consider that is potentially misleading to include that 4 degrees of warming won't see an increase in winter rainfall days given the number could go up by 24%.</p> <p>LCC consider that there should be mention here of the increased risk of wildfires.</p>
Table on pages 5 and 6	<p>Woodlands – there is no reference here of the impact of waterlogging during prolonged periods of wet weather or flooding. Waterlogging can increase the likelihood of trees being brought down in storms and can increase the risk of disease.</p>
13	<p>“Limiting this rise to 1.5°c was the aim of the Paris Agreement and it is suggested that we have already reached this level in 2024.” – it should be noted that the Paris Agreement did not refer to a single year of above 1.5 degrees temperatures but to a long-term trend. Although this fact makes the situation no less urgent, according to international law the targets of the Paris Agreement have not yet been broken.</p>
20	<p>The future action planning section outlines an approach which will aim to ‘resist change to moorland management, habitats and soils over the next 20-30 years’ – this would be a disastrous approach and not something that LCC consider should be a suggestion in a Climate Adaptation Plan. Serious changes in management of land (particularly heather moorland, which is not a naturally occurring habitat and is of low ecological value, low ecosystem service, and high fire risk) need to happen BEFORE it's too late, not after 30 years when the situation will be severe.</p> <p>As above, LCC consider that the ‘Resist’ portion of the RAD approach outlined on this page is not best suited for an environment which is actively degrading (peatland and agricultural soils for example). The ecosystem in the Bowland Forest is in need of repair, and the most effective method of doing that is to change and management practices.</p>
Table on pages 21 and 22	<p>The third column of this table has been left empty.</p>

Main Actions Table	<p><u>Planning pressures - new development</u> There is mention here of the value of the floodplain and how it can alleviate flooding. This could therefore perhaps include a corresponding action for identifying spaces that could be introduced to the flood plain, such as agricultural land which is currently drained by ditches etc.</p> <p>It is unclear how 'pressure for building adaptations such as rooftop solar panels' could lead to 'loss of green/biodiverse spaces' such as meadows. Has this perhaps been placed in the wrong section?</p> <p><u>Towns and Settlements</u> Similar to the above, it is unclear how raingardens and water infiltration will improve air quality</p> <p><u>Moorland and peatland</u> LCC suggest that more actions are added into the fire risk section here, such as consideration of enhancing biodiversity, banning controlled burns, moving away from monoculture practices, re-wetting, potential fire breaks etc</p> <p><u>Upland Heath</u> The action here of 'improved heather management and grazing' could be misleading as to what is actually being supported. Does this include management practices such as controlled burns? Is this advocating a reduction in stocking rates or an increase?</p> <p>There is no mention of improving biodiversity on heather moorland. This would not only reduce the impact of the heather beetle, but also impact of droughts, reduce the risk of wildfires, and reduce risk of flooding elsewhere. It would also mean that bracken would be less likely to take over and would therefore lower management costs.</p> <p><u>Unimproved grassland</u> LCC consider that the CAP would benefit from additional specifics on the 'appropriate management' of purple moor grass and rush pasture, as this could be interpreted in multiple ways by the end user.</p>
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Your Response

19. Would you like your name to be displayed alongside your comments?

- Yes**
- No (if no, your response will remain anonymous)

20. Name:
Lancaster City Council

21. Please provide your email address if you'd like to be notified when the **Consultation Report** is available on our website. (Your email will not be published in the report.)

dneville@lancaster.gov.uk

22. We take your privacy seriously and will only use the information you provide for the purposes of the Management Plan consultation.

You can find our Privacy Notice here: <https://www.forestofbowland.com/privacy-notice> *

Yes, I have read the privacy notice

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