

Site Q
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This is a 'Greenfield' site with *natural springs* in the field.

These are all 'Greenfield' sites as are many of the suggested sites in the LDF. Paragraph 9 of the NPPF "pursuing sustainable development" includes "moving from a net loss of bio-diversity to achieving net gains for nature". This must be achieved through implementation of all wildlife legislation and ensuring developer compliance of this through the Natural Environment & Rural Communities Act (2006). I therefore support additional measures agreed by Lancashire Wildlife Trust and the Planning Authority to give conservation and ecology greater weight in the LDF. An Environmental Impact Assessment (EIA) of the proposed development ensures that a decision is made to in full knowledge of any likely significant effects on the natural environment

One of the 12 core planning principles of the NPPF remains to "encourage effective use of land by reusing land that has been previously developed" (Brownfield land). It is regrettable that many of the proposed sites are 'Greenfield' sites despite the existence of available 'Brownfield' land in the Borough, irrespective of whether it is 'viable' or not from the developer's viewpoint.

I remain concerned that too many of the sites are 'Greenfield' and should like to pose the question that in the event of further 'Brownfield' sites coming forward for development in addition to the Wesley St. Mills site, would this render development on 'Greenfield' sites redundant, unnecessary and in breach of the NPPF's three dimensions economic, environmental and social. It is more appropriate to develop from a 'Brownfield site in compliance with the NPPF than to turn over a green field for development where "moving from a net loss of bio-diversity to achieving net gains for nature" is difficult. An Environmental Impact Assessment (EIA) of the proposed development ensures that a decision is made to in full knowledge of any likely significant effects on the natural environment

It is also in close proximity to a possible biological heritage site (species rich grass) to that described in the ecological report prepared for a Brownfield site planning site application at nearby AMS Trading Industrial Park.

Some months ago last autumn, **site Q** was 'cleared' denuding it of bushes, shrubs & trees (despite the fact that wildlife legislation and planning guidance on ecological matters indicate that surveys have to be done & mitigating measures undertaken) that have made it an effective wildlife haven. The Planning Authority had no control over this inappropriate action, but it is thus incumbent upon the Planning Authority to protect land from such 'clearance' until planning permission is given following LDF 'adoption'. This will help to ensure that protected species remain undisturbed on the habitat until detailed comprehensive ecological reports with appropriate surveys are carried are at the appropriate time just prior to development.

Simple observation of this site indicates access to it for vehicles would be apparently difficult if not impossible, making any planning application seem opportunistic and speculative rather than a viable one based the premise of sustainable development.

Paragraph 124 of the NPPF states that "by encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation".

Artificial night lighting is disturbing to many of our bat species, including some of our rarest and most vulnerable with light acting as a barrier, disrupting flight paths and fragmenting and restricting access to their habitats. Where bat habitats and foraging areas are present, the minimum amount of light should only be used for safety. Bats are protected by EU legislation and the Wildlife & Countryside Act (1981) and the Conservation (Natural Habitats etc) Regulations 1994.