

**Summary of Representations Received on the  
Biodiversity (SPD): Scoping  
Consultation between 22<sup>nd</sup> November 2018 and 3<sup>rd</sup> January 2019**

Consultee	Key text from representation	Changes sought	Council Response
<b>Introduction</b>			
All respondents	Supported the production of the Biodiversity SPD.	No Change	The Council welcomes the support for this document.
Environment Agency	We are pleased to see the reference to the Government's 25 Year Environment Plan and the principle of 'net gain' for biodiversity. The emerging SPD should build on this and provide guidance for developers.	Emphasis on net gain in the SPD	The Biodiversity SPD will build on the principle of net gain and provide guidance for developers.
Canal and River Trust	We welcome the acknowledgement of the Lancaster Canal at paragraph 1.12 and 3.8. The Canal should be acknowledged as a county wildlife site within the document.	The Lancaster Canal to be described as a County Wildlife site	There will be an Appendix to the SPD that's list all of the Biological Heritage Sites (County Wildlife Sites) in Lancashire.
Natural England	<p>Paragraph 1.9 – refer to the correct designation, Ribble and Alt Estuaries SPA. This section should also include reference to Liverpool Bay Special Protection Area (SPA) and could also mention Martin Mere SSSI and SPA and Marton Mere SPA due to the movement of species between these sites and Fylde's functionally linked land. Text or a map should be added as part of this section to show how the Fylde Coast connects with the North West coast from the Dee to the Solway.</p> <p>Is there any data to show the loss of Carr/wet woodland habitats, not just plantation woodland. Semi-natural, wet woodland is a vulnerable habitat in the area.</p>	Changes to wording.	The Council agrees to the corrections proposed, the Council does not have any data that shows the loss of Carr/wet woodland habitats in Fylde.

Vision, Issues and Objectives			
CAPOW John Rowson	The key issue here is that the removal of existing habitats, whatever the replacement, just does not work.	Comment noted	New development will involve the removal of habitats, it is the Council's responsibility as Local Planning Authority to ensure that new habitats created make up for those lost i.e. net gain
CAPOW John Rowson	We consider that there is too much emphasis placed on Lytham St Annes without considering the wider Fylde overall.	More emphasis on the rural parts of inland Fylde.	Lytham St Annes is located directly adjacent to protected habitats e.g. The Sand Dunes. Therefore, the risk of visitor pressure is high which is why this is acknowledged as an issue.
John Leadbetter	Supports the issues highlighted.	None	The Council welcomes Mr Leadbetter's support
Fylde Bird Club	Agree the SPD should consider the Issues and Objectives	None	No additional Issues or Objectives were suggested.
Paul Ellis	Key biodiversity hotspots and important sites for scarce species should identified and recorded, a map of sensitive sites should be compiled and maintained. It is important to understand that many important sites have no designations or protection afforded to them. Fylde Bird Club can advise on important sites for birds.	A Register of Sensitive Sites should be compiled and maintained by the Council.	The Biological Heritage Sites register performs this role, Lancashire County Council does still designate new BHSs. Fylde Bird Club could advise Fylde Council and Lancashire County Council of candidate BHS sites which could then be assessed and added to the register of BHS.
United Utilities	Open space and recreation provision in new developments presents an opportunity to provide much needed SuDS to manage flood risk and reduce the amount of surface water- run off from developments.	Include text on SuDS	The Council acknowledges that surface water drainage is an issue and that SuDS present an opportunity to enhance biodiversity. The value of SuDS for enhancing biodiversity will be highlighted in the SPD.
Lancashire Wildlife Trust	The list of objectives should refer to protecting the national and local sites of biodiversity importance.	Additional objective.	Text will be included in the SPD.

	I <b>disagree</b> with the objective 'to investigate the use of the Lancashire Ecological Framework.....'. It should be used in order to identify ecological networks and identify locations where the network needs to be enhanced and where new development would be expected to contribute to that process.	Amendments to the SPD to include a more detailed section on the Lancashire Ecological Network	A section on using the Lancashire Ecological Framework will be written into the section on determining planning applications.
	The objective 'to highlight the lack of up to date surveys for Biological Heritage Sites' is weak. Individual Local Authorities should prioritise their BHS for re survey, or put the onus on the developer to resurvey, wherever a BHS is likely to be affected by a development proposal. These appraisals should be submitted to LERN in order to assist in keeping the County's ecological records database up to date.	Amendments to the SPD which commit developers to surveying BHS affected by development and providing the appraisals to LERN.	The Council agree, a baseline survey of the BHS should be carried out to reveal the sites current condition. Then an assessment of whether a BHS will be affected will be carried out. If an impact is predicted an assessment will be requested from the developer.
Natural England	Recreational Disturbance should be included as an issue, with an objective of improving public awareness of the issue and educating them in the correct behaviour when near/on sensitive sites.	Additional issue/objective	This issue will be highlighted in the mitigation section of the SPD. Recreational disturbance in general is a beach/dune management issue.
	Ecological Connectivity should be included as an issue, with an objective of improving ecological activity between existing habitats.	Additional issue/objective	This will be covered in the section on the Lancashire Ecological Network.
	Include the impact of invasive species, and inclusion of non-native species within landscape planting, with an objective of raising public awareness and giving advice on species suitable for landscaping new development and	Additional issue/objective and list of	Invasive Species and use of native/local stock will be covered by the SPD.

	green open space, as well as advice on the management and eradication of invasive species.  A list of invasive species was included with the response.	invasive plants.	
<b>Policy and Guidance Review</b>			
CAPOW John Rowson	Paragraph 3.3, Development is contrary to these objectives and results in flooding.	No change requested	The objectives are part of the adopted Fylde Local Plan to 2032 and therefore cannot be amended.
	Paragraph 3.9 run off calculations should consider local aspects/differences, not one of the bodies involved in agreeing run off rates or development, checks compliance.	No change requested	More detailed information on these matters could be included in an SPD on Sustainable Urban Drainage Systems.
	Page 11, the documents listed and any forthcoming documents covering such matters should be incorporated into the SPD as updates.	No change requested	The Council will include reference to the most up to date versions of all the referenced documents at the time of publication of the SPD.
John Leadbeater	Paragraph 3.21 Developers will simply pay lip service to this document, there is no reference to working with local farmers to promote methods which protect and enhance local wildlife. Some countryside activities run counter to the aspirations of paragraph 3.2.1 e.g. Wildlife shoots which treat ponds as shooting ranges and must be detrimental to all wildlife.	No specific wording requested	Paragraph 3.2.1 cannot be amended as it is an excerpt from the Bryning with Warton Neighbourhood Plan. This SPD can only provide further detail and guidance in relation to policies and proposals within the Fylde Local Plan to 2032. It is acknowledged that agricultural practices and wildlife shoots are issues which have negative impacts on wildlife and biodiversity, however these practices cannot be controlled by planning legislation therefore they cannot be resolved by this SPD.
Fylde Bird Group	The SPD should reference 'Designing for Biodiversity' Gunnell, Murphy, Williams ISBN 9781859464915 published by the RIBA.	Reference adding	The Council will reference this document.

Lancashire Wildlife Trust	<p>The following documents/text should be used to inform the writing of the SPD:</p> <p>Sefton Council's Nature Conservation SPD</p> <p>Central Lancashire Biodiversity and Nature Conservation SPD</p> <p>Biodiversity Audit of Fylde Borough 2006</p> <p>Spatial Planning Guides</p> <p>The relevance of these spatial guides to Fylde, more generally is to emphasise the importance of the agricultural hinterland which is so important to both farmland birds (known to be in decline) and the SPA species (especially Whooper Swan in Fylde). This area is under cumulative pressure from a number of permitted developments e.g. Queensway, the M55 link road and Whyndyke Farm. This area is also important for its network of watercourses and ditches.</p> <p>Marine Environment including marine plastic, the litter picking groups <a href="http://www.livingseasnw.org.uk">www.livingseasnw.org.uk</a></p> <p>Accessible Natural Greenspace Standard</p> <p>Fylde Sand Dunes Management Plan (update)</p> <p>Geomorphological Study for the Starr Hills – St Anne's</p>	All of the references included to be referenced in the SPD plus other useful supporting text included in this part of the response.	<p>The Council will include the additional references and text included in this part of the response.</p> <p>The Council had reviewed the content of Sefton's SPD as part of its research for the SPD and will look at the Central Lancashire SPD.</p>
Natural England	<p>The following documents should also be referred to:</p> <p>Conservation of Habitats and Species Regulations 2017- in relation to the Habitats Regulations Guidance given in another section.</p>	References to these documents to be included in the SPD	The Council will include references to these additional documents in the SPD.

	Conservation Advice Packages for Ribble and Alt Estuaries SPA and Liverpool Bay SPA. The Shoreline Management Plan		
<b>Biodiversity Issues in Fylde (this section is divided into Sections 4 – 15 in accordance with the sections in the Scoping Report)</b>			
<b>Section 4 International and European Sites and functionally linked land.</b>			
CAPOW John Rowson	Page 13 No comment as we have no involvement with International or European Sites.	No change requested	No change needed
Persimmon Homes	<p>Paragraph 4.6 describes examples of mitigation measures for International and European Sites. Persimmon support the incorporation and use of POS within the site to encourage biodiversity, however management and maintenance of POS outside the proposed development boundary would pose issues.</p> <p>Any contributions towards encouraging people to access International or European sites, or enhancing alternative POS to the coastline, would be supported in principle. However, we would need further information further information regarding the calculations for this contribution as the impact of additional costs would need to be considered to ensure the development remains viable.</p> <p>We would be happy to, and support the idea of providing an information pack to new residents, advising of protected areas for biodiversity.</p>	Text in the SPD to acknowledge that provision of open space outside the development site could pose issues for the developer. Viability of provision should be referred to.	<p>The text does not say that the developer would be responsible for maintaining and managing POS away from the development site. It is likely that the Council will take over management and maintenance of any POS in any event.</p> <p>The aim of improving access would be to direct people away from sensitive areas. Additional text referring to viability of provision will be included.</p>

John Leadbeater	Question page 13 Answer No	No change requested	Response noted.
Fylde Bird Club	<p>Page 13 The practice of filling in and draining field ponds continues and should be reversed.</p> <p>Providing seed strips and uncropped field margins plus broad hedgerows would provide good habitat on arable peat farmland and we advise consulting and collaborating with the RSPB who can offer expert advice.</p> <p>The importance of shore birds on the Ribble estuary/coast (SSSI/SPA/Ramsar site) should be key within the SPD with a plea to control disturbance by zoning small areas of the beach in order to provide high tide roosts. Zoned areas would improve breeding success for dune birds including Reed Bunting, Meadow Pipit and Stonechat). The zoned off areas could also assist with Coastal Protection against flooding and prevent wind blown sand at minimum cost and maintenance.</p>	Inclusion of information on these issues in the Issues section.	<p>This is not a matter which can be facilitated by the planning system, however the SPD will highlight it as an issue.</p> <p>Beach Management is a matter for the Council, recreational pressure on the foreshore will be highlighted as an issue in the SPD however, the purpose of the SPD is to inform planning decisions. Beach Management is covered by other Council documents e.g. Sand Dunes Management Action Plan.</p>
Lancashire Wildlife Trust	Paragraph 4.1 needs to reference Whooper Swans	Additional text	Add reference to Whooper Swans.
	4Q Mitigation Measures – aside from the sandwinning review (impact on sand supply and observed disturbance of wintering birds by sand winning vehicles) the Council should liaise with the Morecambe Bay Project & Lancaster City Council as they have commissioned research into SPA bird disturbance especially with dogs. This is an issue on the Fylde Coast that will need to be tackled by the Ranger Service, especially in relation to the new Pontins development residents and their pets.	Further research and amendments to the document.	<p>The Council has liaised with the Morecambe Bay Project and Lancaster City Council and obtained a copy of the study.</p> <p>Beach Management is a matter for the Council, recreational pressure on the foreshore will be highlighted as an issue however, the purpose of the SPD is to inform planning decisions. Beach Management is covered by other Council documents.</p>



			<p>The Pontin's development has planning permission, there are no outstanding issues, the approach to on- going mitigation was agreed with Natural England and the Greater Manchester Ecology Unit.</p> <p>The issues of disturbance by dogs (birds) and predation by cats (reptiles) will be highlighted in the section of the SPD that describes how planning applications will be assessed.</p>
	<p>Methodology approach page 13, the LWT conclude that ultimately, it is hard to completely avoid a site by site approach.</p> <p>Whole Coast Approach, there have been preliminary discussions with Natural England about agreeing a mitigation package for all of the various works along Fylde's coast (dune management, sea defence works, Fairhaven Lake HLF project etc ) rather on a project-by-project basis.</p>	No specific amendment requested	<p>The Council has reviewed the Central Lancashire and Sefton SPDs, and noted the comments from LWT. A site by site approach to mitigation will be written into the Biodiversity SPD.</p>
Natural England	<p>4Q. A methodology could be used for certain types of lower risk, smaller developments and then a site by site approach for larger more high risk sites with examples of mitigation which could be suitable. Fylde Council could also commission a recreational disturbance study to understand the problem, highlight problem areas and suggest more tailored solutions for the Borough.</p>	No specific amendment requested	<p>The Council has reviewed the Central Lancashire and Sefton SPDs, and noted the comments from LWT. A site by site approach to mitigation will be written into the Biodiversity SPD.</p> <p>Beach Management is a matter for the Council, recreational pressure on the foreshore will be highlighted as an issue however, the purpose of the SPD is to inform planning decisions. Beach Management is covered by other Council documents.</p>

Section 5 Lancashire Ecological Network			
CAPOW John Rowson	Page 14 We agree	No change	Support noted
Fylde Bird Club	Page 14 In principle providing wildlife corridors and stepping stones is a good idea.	No change	Support noted
Lancashire Wildlife Trust	5Q You need to commit to use the Lancashire Ecological Network rather than just investigate its use. A constraints layer would be useful BUT this needs to be based on up to date accurate information	Amendments to the SPD to include a more detailed section on the Lancashire Ecological Network	A section on using the Lancashire Ecological Framework will be written into the section on determining planning applications.
Natural England	We recommend that these maps are used to identify areas where habitats could be better connected and that land used accordingly.	Amendments to the SPD to include a more detailed section on the Lancashire Ecological Network	A section on using the Lancashire Ecological Framework will be written into the section on determining planning applications.
Section 6 Assessing the Biodiversity Implications of Development			
CAPOW John Rowson	Paras 6.1 to 6.4 we believe to use mitigation is NOT sufficient, full retention and far less disruption to fauna and key flora is more applicable.	No specific change requested	Comment noted

	Page 16 subject to additions regarding the above, we agree.		
Fylde Bird Club	Page 16 Assessing Ecological Issues in Planning, could Biodiversity mitigation projects be better funded using Section 106 agreements?	No specific change requested to SPD	This could be progressed through Community Infrastructure Levy (CIL). The Council could add Biodiversity Mitigation Projects to its 123 list. The CIL test does require there to be direct impacts.
Lancashire Wildlife Trust	<p>Most applications for new development should be accompanied by an ecological statement and if that statement identifies any habitats/features of potential importance for wildlife then an ecological appraisal should be required which must demonstrate how biodiversity will be enhanced and how habitats within the site will connect to the wider ecological network.</p> <p>It is really important to direct applicants to the ecological survey calendar as some have no understanding of the time constraints to survey.</p>	Include ecological survey calendar	The Ecological Survey calendar will be included in the SPD
Natural England	<p>Paragraph 6.2 The Impact Risk Zone (a 2km zone around an SSSI). Impact Risk Zones are not a 2km zone around an SSSI. Each IRZ is tailored to its area and species affected.</p> <p>Paragraph 6.4 – The wording in this paragraph is incorrect and must be changed. Please use the wording under Regulation 63 of the Conservation of Habitats and species regulations to explain the requirements for a HRA. It is the competent authorities responsibility to produce the HRA however, it is the developer's responsibility to provide sufficient information so that the Local Planning Authority</p>	Corrections to text requested	Text will be corrected

	<p>can produce their HRA. Sometimes developers produce a shadow HRA to assist the LPA. If the LPA agrees with this Shadow HRA they can adopt it as their own.</p> <p>Natural England is a statutory consultee on all Appropriate Assessments.</p> <p>For more challenging developments, NE provide a charged Discretionary Advice Service (DAS). This service provides non-statutory advice related to development proposals. Details of this service can be found on the Natural England website.</p> <p>Q6. We would always recommend the use of our Impact Risk Zones. These IRZs can be used to screen whether the planning application or site allocation is likely to have an impact. The IRZ dataset can be downloaded for use on any GIS system or viewed via magic maps. Further information and guidance on how to access and use the IRZs is available on the Natural England website.</p>		
<b>Section 7 Information for Homeowners</b>			
CAPOW John Rowson	Page 17 Agreed	No Change	Support noted
John Leadbeater	<p>Question Page 17 Answer: Yes but it sounds rather weak</p> <p>Mr Leadbeater then answered Yes to all of the questions in the document apart from number 10 which was left unanswered.</p>	No specific change requested	This approach to Environmental Education of residents of new dwellings has proved effective.
Fylde Bird Club	Page 17 Providing Information to New Home Owners about areas protected for their biodiversity in the Local Area - supported	No change requested	Support noted

Lancashire Wildlife Trust	<p>Support for leaflets and ranger service. This approach should be broadened to include what residents could do with their own gardens or shared communal space on new developments. This could be funded by developers Community Social Responsibility Fund.</p> <p>7Q Yes LWT do broadly agree with this approach to managing recreational pressure.</p>	Include additional text on gardens and communal space.	Text will be included.
Natural England	Yes, but this is only one form of mitigation, all mitigation options should be kept together in Section 4. Natural England are currently working on what packs should contain and can help with this.	Include this with other mitigation.	All mitigation methods will be included in one section although they will be split into mitigation in general and mitigation in relation to the International and European Sites.
<b>Section 8 Permitted Development</b>			
CAPOW John Rowson	Page 18 Agreed subject to there being any biodiversity left once developers have finished!	No specific change requested	Comment noted
Fylde Bird Club	<p>Page 18 Permitted Development and Best Practice</p> <p>Barn conversions is our biggest concern, planning permission is not necessary, however any works effecting breeding birds is in breach of the Wildlife and Countryside Act 1981(as amended). Reference should also be made to 'Designing for Biodiversity' Gunnel, Murphy, Williams ISBN 9781859464915 published by the RIBA. Specific detailing is shown in this book of how Barn Owl Areas can be built directly into the barn conversion.</p>	Reference should be made to the Wildlife and Countryside Act 1981 and Designing for Biodiversity	The Council will write this into the SPD
Lancashire Wildlife Trust	8Q LWT agree that the SPD should set out best practice with respect to permitted development.	No change requested	A section on permitted development will be included

Natural England	8Q Yes, to raise awareness of easy ways to improve biodiversity within developments.	No change requested	Support noted
<b>Section 9 Prior Notification and Prior Approval</b>			
CAPOW John Rowson	Page 19 agreed subject to prevention of unapproved use of property which contains local wildlife (except rats!) Such usage should require immediate enforcement and prohibition – but it doesn't.	No change requested	Comment noted
Fylde Bird Club	Page 19 Prior Notification and prior Approval for Demolition consents.  We agree that the SPD should set out best practice and again reference should be made to any disturbance of nesting and breeding birds and the Wildlife and Countryside Act 1981(as amended).	Reference should be made to the Wildlife and Countryside Act 1981	The Council will write this into the SPD.
Lancashire Wildlife Trust	9Q LWT agree that the SPD should set out best practice with respect to Prior Notification.	No change requested	Support noted
Natural England	No Comment		
<b>Section 10 Nationally Significant Infrastructure Projects</b>			
CAPOW John Rowson	Page 20 No information is available for the effect of fracking (released gases, tremors, spills and polluted waterways) on wildlife surrounding fracking sites. This needs to be considered.	SPD to cover fracking	Fylde Council is not the Local Planning Authority for fracking, therefore SPDs will not cover fracking.

Lancashire Wildlife Trust	10.Q The approach seems reasonable given that the resultant development impacts will be felt at a local level.	No change requested	Support noted
Natural England	We agree with this approach and have no further comments to make.	No change requested	Support noted
<b>Section 11 Lytham St Annes – pressure on the Dunes</b>			
CAPOW John Rowson	Page 21 No comment this applies to Lytham St Annes.	No change needed	Comment noted
Fylde Bird Club	<p>Page 21 Sand Dune Management as the population of Lytham St Annes grows.</p> <p>Any new development in Lytham St Annes should make a contribution to the ranger service. Zoned off areas, the Ranger Service and actively managing the dunes will increase breeding success for wildlife and plants.</p>	Additional wording	The former Pontins Site has planning permission and mitigation for that site has been agreed. New development must have a direct impact in order for it to have to provide mitigation. Not all new development in Lytham St Annes will have an impact on the Sand Dunes therefore it is not possible to write this into the SPD.
Lancashire Wildlife Trust	11.Q Yes but there is a need to manage the dunes into the future, beyond the current period for which funding is secured (EA and Pontins s106 monies).	No change to SPD	<p>The Council is aware that the Sand Dunes will always need management, the funding for this is an on-going financial commitment and is not a matter for this SPD.</p> <p>If development is demonstrated to have a direct impact, then one way of dealing with this could be a contribution to the Ranger Service. However, most developments will not have a direct impact therefore this is not necessarily a long term solution.</p> <p>This could be progressed through Community Infrastructure Levy (CIL). The Council could add</p>

			Biodiversity Mitigation Projects to its 123 list. The CIL test does require there to be direct impacts.
Natural England	Yes, we support this approach, which could also provide mitigation against recreational disturbance issues.	No change requested	Support noted.
Environment Agency	It should be added that the coastal dunes also function as a soft natural flood defence in addition to biodiversity provision.	Text added about the flood defence value of the dunes	The Flood defence function of the dunes will be added.
<b>Section 12 Nature Improvement Areas</b>			
CAPOW John Rowson	Page 22 We agree	No change requested	Support noted.
Fylde Bird Club	Nature Improvement Areas we fully support this concept	No change requested	Support noted.
Lancashire Wildlife Trust	12Q. It is fine to have an aspiration to have Fylde NIA however, the Fylde Peninsula should be looked at as a whole, given its bird importance and the interchange between SPA's and feeding-roosting areas across four local authority areas. Similarly, mobile species using wetland networks such as water vole, otter and great crested newts.	Additional text to explain that NIA should consider whole Fylde Peninsula.	Text will be included
Natural England	Agree with the approach	No change needed	Support noted
<b>Section 13 Biological Heritage Sites</b>			



CAPOW John Rowson	Page 23 No	No change requested	Comment noted
Fylde Bird Club	Page 23 Lack of up to date surveys for Biological Heritage Sites – Fylde Bird Club has a vast historical database populated by members inputting regular sightings across the whole borough, they can check their databases and provide relevant information for an agreed fee.	No change requested	Offer of assistance noted
Lancashire Wildlife Trust	13Q The SPD could require applicants to submit an up-to-date survey with any application that directly affects or adjoins a BHS. This could be done by strengthening the approach in section 6.	Amendments to the SPD which commit developers to surveying BHS affected by development and providing the appraisals to LERN.	The Council agree, a baseline survey of the BHS should be carried out to reveal the sites current condition. Then an assessment of whether a BHS will be directly affected will be carried out. If an impact is predicted an assessment will be requested from the developer.
Natural England	Fylde Council could approach local universities and Myerscough Agricultural College to see if a review could form part of a student's research.  The Council could also consider working with the Wildlife Trust as part of the Biodiverse Society project to encourage volunteers to help.	No change requested	Suggestions noted
<b>Section 14 Parks and Coasts Design Guide</b>			

CAPOW John Rowson	Page 24 Often management of such areas is either left to owners or management companies. Provided that notice is taken of guidance then we agree.	No change requested	Support noted
Fylde Bird Club	Page 24 Parks and Coast Design Guide Parks and Coast Design Guide – we agree that developers should be made to adhere to prescribed standards within the SPD.	Incorporate text in the SPD requiring developers to adhere to the Parks and Coast Design Guide.	The Parks and Coast Design Code is a Council Document which is mainly aimed at the Council itself, with respect to ensuring that signage, furniture etc is of a consistent design. However, it would be useful if developers who are providing Public Open Space also adhere to this code.
Lancashire Wildlife Trust	<p>14Q. <b>Planting</b> – we would like the SPD to emphasise the issue of appropriate species choice (native to the locale) and local provenance stock. This is especially important in a coastal setting where inappropriate species will either fail or worse still spread to become invasive. Many of the Dunes Project problems with invasive non-native species stem from past introductions in particular Japanese Rose which is a frequent landscaping scheme choice. Japanese Rose can spread by up to 25% per annum.</p> <p><b>Local stock</b>, again on the dunes, the Dunes Project have started to use Marram plants grown from seed collected on the dunes. Lyme Grass will be needed as we get closer to the tidal limit as it can survive periodic inundation by sea water, locally derived seed stock will be adapted to survive on Fylde’s dunes and in the local climate.</p>	Additional text needed	The Council will include additional text
Natural England	14Q Answer Yes		Support noted

Section 15 Swifts			
CAPOW John Rowson	Page 25 We agree with this Swift conservation- if it works. It should be tested. In rural Fylde bats, owls and hares are coming under constant pressure by development.	No change requested	Support noted
Fylde Bird Club	Page 25 Raise awareness of the decline of Swifts. We fully support the concept of raising awareness of Swifts in Fylde and the RSPB approach. Farmland birds such as Yellow Hammer and Corn Bunting are declining in Fylde, seed strips, headlands, uncropped field margins, undrained wet areas and broad hedgerows should all be encouraged in the SPD.	Incorporate text about farmland birds and habitat.	<p>The Council will include a section called Enhancement of Development Sites which includes a list of examples which can be required by planning decisions where the evidence demonstrates that there is a need e.g. nest boxes for swifts and owls.</p> <p>The planning decisions cannot usually influence farming practices unless they require an area of farmland managed for birds e.g. the farmland conservation area at Lytham St Annes. However, this area is managed as mitigation for loss of the Queensway site and it is managed for birds associated with the International and European Sites such as Pink Footed Geese and Whooper swans. It will not be possible to include text in the document requiring farming practices to be modified for farmland birds in general.</p>
Lancashire Wildlife Trust	15Q. Swifts aside Fylde is important for both its SPA birds and farmland arable species further inland as well as at Newton Marsh SSSI and it's Black Tailed Godwits. The Lancaster RSPB office will be able to provide the latest information on bird conservation priorities in Fylde/Ribble & Alt Estuary SPA.	Incorporate text about farmland birds and habitat.	The Council will amend the SPD accordingly.
Natural England	Yes we agree with this approach. The Council could also consider rare arable plants and traditional orchards.	Additional text requested	If rare arable plants or traditional orchards were identified during an Ecological Survey, the survey

			would have to consider the impact of any proposed development upon them.