

Comment received from Natural England

In relation to the Rossendale Borough Environmental Network Study by TEP (Jan 2017) one of my colleagues on our Uplands Team has had a look through and provided some brief comments which I hope you find useful:

We strongly support the work being done on preparing an environmental network study for Rossendale which will be a valuable tool when allocating development and seeking opportunities to enhance the natural environment. The following comments identify some areas where the study could be strengthened/improved.

We feel the study currently overlooks the important connection between the uplands and elsewhere in the borough. There is little reference to the importance of the upland areas for retaining water and slowing the flow through appropriate management/restoration. The study gives more attention to managing watercourses and the benefits of tree planting overlooking the extensive area of peatland in Rossendale. For management of some corridors action needs to start at the top of the hill. Appropriate management and restoration of peatlands on a catchment level will have benefits to water management, reducing flood risk, biodiversity & peoples enjoyment.

The following paragraphs link to this matter:

Para 10. sub-catchments only refers to woodland planting benefits – remember peatland restoration benefits.

Para 19. valleys flood proofing - remember action needed in the uplands to achieve this.

Para 21. policy relating to managing land to increase biodiversity should include reference to safeguarding priority habitats, reference to latter in 7.84/7.91.

Para 5.17. benefits of green infrastructure reference to SUDS/urban GI, overlooks rural action i.e. management of water flow above valleys. Need combination of GI & land management in uplands to maximise benefits.

Para 5.34. comment here regarding the challenge of risk of flooding illustrates the importance of managing the catchments, i.e. peatland to slow the flow.

Para. 7.24. seems to overlook importance of holding back the water on the moors through appropriate management/restoration only referring to streams /tree planting benefits.

Para 7.81. does refer to managing land to retain water, reduce run-off etc. but main report doesn't expand on this. Report should refer to priority habitats.

Para. 5.38 . does not list 3 SSSIs correctly, names should be Lee Quarry, Hodge Clough & Lower Red Lees Pasture and West Pennine Moors at the time of the report was legally protected through notification.