

**SCHEDULE OF ACTIONS MATTER 1 (LEGAL AND PROCEDURAL MATTERS)**  
**(Action 1.4)**

**VISITOR MANAGEMENT PLAN**

|            |  |
|------------|--|
| <b>1.4</b> | <b>Produce a short note about the Visitor Management Plan, setting out how it will be produced and when.</b> |
|------------|--|

**1 Introduction**

1.1 This note has been prepared to provide further information to the Inspectors regarding the Visitor Management Plan for the South Pennine Moors Phase 2 Special Protection Area (SPA) and South Pennine Moors Special Area of Conservation (SAC) referred to in Policy ENV4 (Biodiversity, Geodiversity and Ecological Networks) of the submitted Local Plan.

**2 The Visitor Management Plan and the Rossendale Local Plan**

2.1 Rossendale’s Local Plan refers to the Visitor Management Plan as the Habitat Regulations Assessment (HRA) is unable to rule out in-combination effects on the SPA/SAC as a result of visitor pressure to the designated area arising from the number of new homes being allocated albeit the Local Plan for Rossendale will not have a significant effect alone.

2.2 Given Rossendale’s commitment to participating in the wider South Pennines Management Plan, the HRA concludes, “It is considered unlikely that the Rossendale Local Plan will lead to adverse effects on site integrity at either the South Pennine Moors SAC or South Pennine Moors Phase 2 SPA in-combination with other plans.”

2.3 The extract from the Local Plan relating to the Visitor Management Plan, taken from the Submission Version of the Local Plan, is set out below. Please note that there have been changes proposed which will be consulted on during the Main Modifications consultation. These proposed changes, which may be subject to further amendment prior to consultation, are shown in **Appendix 1** to assist the Inspectors.

***Policy ENV4: Biodiversity, Geodiversity and Ecological Networks***

*.....The Council will work with other authorities and partner organisations in the South Pennines to develop a Visitor Management Plan for the South Pennine Special Protection Area (SPA).*

## **Explanation**

*184 The Habitat Regulations Assessment for the Local Plan identified potential impacts of new residential development within Rossendale on 12 species of birds present in the South Pennine Special Protection Area (SPA)/Special Area of Conservation (SAC). While not located in the SPA residents of the Borough, including those in new dwellings, contribute to the recreational impacts on the birds that live there. At a sub-regional level the Council will work with partners to develop a Visitor Management Plan for the South Pennines SPA/SAC area in order to minimise the recreational impacts of Rossendale residents. Many of the species of the birds present in the SPA/SAC also utilise upland areas of Rossendale for feeding and breeding. These can be impacted by recreational use and also predation by domestic cats....*

## **3 Joint Working**

### South Pennine Local Authorities

3.1 The South Pennine local authorities are seeking to co-operate on strategic planning matters including renewable energy, landscape and environmental issues as set out in the South Pennine Statement of Common Ground (2018) (please see **Appendix 2**).

3.2 One of the topics where co-operation is sought is the “*Procurement and implementation of proposals identified in Local Plan Sustainability Appraisals and Habitat Assessments such as Visitor Management Plans*”.

3.3 Rossendale’s Local Plan specifically refers to the Visitor Management Plan. The need for such a strategy was also identified in the HRA accompanying Burnley’s recently adopted Local Plan.

### The role of Pennine Prospects

3.4 Pennine Prospects acts as the Local Nature Partnership (LNP) for the South Pennines and attends the South Pennine Group of Authorities. It is a rural regeneration company set up in 2005 to champion the South Pennines and delivers projects aimed at promoting, protecting and enhancing the built, natural and cultural heritage of this area.

3.5 Pennine Prospects has been working with Natural England on the proposal for recognition of a new non-statutory designated national landscape – the South Pennines Park. This comes from the Government’s Glover review of National Parks and AONBs, which was published in October 2019. Pennine Prospects has received £183,500 funding from National Lottery Heritage Fund to improve sustainable management and build capacity to potentially pave the way for a South Pennines Park. The Statement of Intent is shown in **Appendix 3**.

3.6 The South Pennines Regional Park aims to:

- be England's first non-statutory designated national landscape
- develop a new model of landscape management
- co-create a new normal for delivery of sustainable development in the South Pennines Park that respects the life of all species (please see the Statement of Intent attached in Appendix 3 for further information).

3.7 Pennine Prospects is leading on the production of a 15 Year South Pennines Park Partnership Plan (with three consecutive 5-Year Action Plans) which will ensure due care of statutory designated sites as identified in the NCA 36 Southern Pennines profile by Natural England. This will be prepared in consultation with stakeholders, communities and statutory agencies etc and will be similar to national parks/AONBs management plans.

3.8 Preparation of the Visitor Management Plan for the South Pennines is in its earliest stages, with many details still to be agreed. To date Pennine Prospects has been prioritising the establishment of a Regional Park and that, coupled with difficult working practices throughout the pandemic, has resulted in delays in commissioning the underlying survey work. However, Pennine Prospects has commenced this and is currently talking to Natural England about the new survey to look at origins and destinations of trips in the area, which will be the basis for the Visitor Management Plan. It is expected that Pennine Prospects together with Natural England will commission this work. This study will update the MENE Report ([Monitor of Engagement with the Natural Environment survey \(2009 - 2012\): Visit taking in the South Pennines \(NECR150\)](#)), which was published by Natural England in May 2014 and is becoming dated. Such a study would be important to underpin the Visitor Management Plan. Please see email from Pennine Prospect's Chief Executive in **Appendix 4**.

3.9 Despite this unfortunate delay Rossendale is still keen to see both the survey work and the Visitor Management Plan itself progressed and will work with the LNP and the wider Group to assist with this work.

## **4 Alternative Options**

4.1 In view of the delay in bringing forward the Visitor Management Plan the Council has looked at a number of alternative options.

4.2 Option 1 - Consideration has been given to Rossendale commissioning its own survey work in order to update the previous study undertaken by Natural England and estimate trips from Rossendale to the SPA/SAC. The purpose of such a study would be to examine if visitor trips from Rossendale into the SPA/SAC, combined with trips originating elsewhere, would increase sufficiently as a result of the additional new housing to cause an adverse effect on the

integrity of the SPA/SAC. However, the onset of the lockdown curtailed these discussions and the further restrictions in East Lancashire / West Yorkshire has made it almost impossible to undertake such a study. Furthermore, it can be expected that the pandemic will have created unusual patterns of visits to the countryside this year, as people have been at home more, avoiding urban settings and this, coupled with the exceptionally pleasant weather, would render it difficult to fully assess the results of any such study.

4.3 Option 2 - Calderdale's Local Plan is similarly at Examination stage and the HRA has likewise considered recreational impacts from housing allocations on the SPA/SAC. The Calderdale November 2019 HRA Update (undertaken to reflect additional housing supply) considered the recreational impact from visitors from allocated sites within a 7km buffer of the portion of the SPA/SAC situated in Calderdale. The allocated sites include those situated in Calderdale and neighbouring authorities. Based on the MENE Report 2009-2012 (referenced above) this showed a total of 133,997 visits per year or 0.67% increase overall. As such Calderdale's HRA considers such a small increase is unlikely to result in adverse effects on the integrity of the SPA/SAC. Although the data on which this is based is dated (2012 to 2015), this is the best evidence that the Council has available and so could likewise inform Rossendale's position on in-combination effects from recreation on the SPA/SAC.

4.4 The Council therefore commissioned Lepus Consulting Ltd to consider recreational impacts from housing allocations in Rossendale as set out in the Local Plan, in-combination with forecast growth in neighbouring authorities, on the SPA/SAC using a similar methodology to Calderdale, please see **Appendix 5**.

4.5 Option 3 – Pennine Prospects has already started talking to Natural England to prepare a review of the visitor trips in the South Pennines area and there are advantages in the study including all the local authorities in the South Pennines, and the two Natural England offices (North West and Yorkshire). Other bodies responsible for the maintenance of the South Pennines will also be involved such as landowners, Moors for the Future etc. As stated above, the Council is supportive of the strategic approach of a Visitor Management for the South Pennines Regional Park and will collaborate with Pennine Prospects, neighbouring authorities and partners to bring this forward.

4.6 Also, it should be noted that The Countryside and Rights of Way Act 2000 and the Countryside Code (updated on 2 July 2020) provide a framework of rights and responsibilities for the enjoyment of the countryside by the public, and this will help reduce recreational impacts. The Act enables landowners to restrict access from the public under specific circumstances such as during the breeding season of ground-nesting birds. The Countryside Code, which was recently updated following the Covid-19 pandemic, also provides statutory guidance on protecting the natural environment. Specific advices include following existing paths and ensuring dogs do not harm wildlife. In particular,

the Code makes clear that dogs should be kept on a short lead between 1 March and 31 July to help protect ground-nesting birds.

## **5 Conclusion**

5.1 The HRA Technical Advice Note (October 2020) shows that using data from Natural England's MENE report, the impact of the Rossendale Local Plan, in combination with growth set out in neighbouring authorities' Local Plans, on visitor numbers is small scale in nature and "unlikely to result in an adverse effect on the site integrity of the SPA/SAC". Therefore, on the basis of the analysis of current forecast growth and the application of best available existing survey data, "the implementation of a Visitor Management Plan is not considered necessary for the delivery of the Local Plan".

5.2 Natural England have been informed of the HRA Technical Advice Note and are satisfied of the methodology and conclusions reached (please see **Appendix 6**).

5.2 Pennine Prospects is leading on the creation of a South Pennines Park and associated 15 Year Partnership Plan. This will include preparation of a Visitor Management Plan which will be based on an updated survey of recreational trips within the area. However, no specific timeline is currently available.

5.3 The Council is committed to work in collaboration with Pennine Prospects, Moors for the Future and the other South Pennine Local Authorities (as demonstrated by the Statement of Common Ground) to protect and enhance the South Pennines environment and the European designated sites in particular (the SPA and the SAC, which together form one of the UK's Natura 2000 sites).

## APPENDIX 1

### Proposed Main Modifications to the Rossendale Local Plan 2019-2034 (Submission Version) Policy ENV4

|  |      |    |   |   |
|--|------|----|---|---|
|  | ENV4 | 81 | Delete 6 <sup>th</sup> paragraph of policy:<br><del>Provision of, or contributions to creation of, Sites of Suitable Alternative Natural Green Space (SANGS) will be sought where development would have an individual or cumulative impact on Priority Species resident in or making use of habitat in the Borough.</del>  | To remove all references to SANGs as agreed in the Examination hearings as this is not considered to be an appropriate mechanism in this context            |
|  |      |    |   |   |
|  | ENV4 | 82 | Amend 2nd sentence of 5 <sup>th</sup> paragraph:<br>Delete:<br><del>Developments of 100 dwellings or more will be expected to undertake an "Appropriate Assessment" of the impact of the proposal on the Breeding Bird Assemblage for the South Pennine Special Protection Area that are also present within the Borough.</del><br>Insert:<br><u>Development proposals should demonstrate they will not adversely affect the integrity of any European site of nature conservation.</u> | Final wording to be agreed with Natural England;<br>To reflect the discussion at the Hearings that a 100 dwelling threshold was not considered appropriate. |
|  | ENV4 |    | ensure reference to SPA/SAC is consistent throughout document (see Day 1 Main Modifications);   | For consistency   |
|  | ENV4 | 81 | Insert:<br><u>Any adverse effects should be first of all avoided; if this is not possible, minimised and mitigated against, and where this cannot be achieved, compensated for. All development proposals should seek to protect and enhance biodiversity and geodiversity, and will be requested to quantify any net gains.</u>  | For clarity   |
|  | ENV4 | 84 | Delete last sentence of Explanation:<br><del>This may include the creation of Sites of Alternative Natural Greenspace (SANGS) to compensate for any damaged habitat.</del>  | To remove all references to SANGs as agreed in the Examination hearings as this is not considered to be an appropriate mechanism in this context            |

## **APPENDIX 2 –**

### **SOUTH PENNINE STATEMENT OF COMMON GROUND (2018)**

#### **South Pennine Statement of Common Ground**

##### **PURPOSE**

This Statement of Common Ground establishes a framework for co-operation between South Pennine local authorities with respect to strategic planning and developments relating to renewable energy, landscape and wider environmental, recreational, climate change and ecological issues. It is framed within the context of the Section 110 of the Localism Act 2011 and the duty to cooperate in relation to the planning of sustainable development, especially as set out in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). It sets out the way in which the authorities have, and will continue to, consult one another and work together on matters which affect the South Pennine area.

In line with the National Planning Policy Framework, particularly paragraphs 149-151 and 170-176 Planning Authorities will seek to take a positive approach to renewable energy development both in development planning and management. The landscape and environmental assets of the South Pennines are fundamental to its identity and Councils will work together with partners to protect and enhance these features. This will include taking opportunities to maximise strategic cross-border benefits as well as ensuring that any potential negative impacts are minimised or avoided.

##### **PARTIES TO THE MEMORANDUM**

The Memorandum is agreed by the following Local Authorities:

*Barnsley MBC*

*Burnley BC*

*Bury MBC*

*Craven BC*

*Calderdale MBC*

*High Peak BC*

*Hyndburn BC*

*Kirklees MBC*

*Lancashire CC*

*Oldham MBC?*

*Pendle BC*

*Rochdale MBC*

*Rossendale BC*

##### **OBJECTIVES**

The Statement of Common Ground has the following broad objectives:

- To help secure a process and framework enabling a consistent strategic approach to Renewable Energy issues as appropriate; including development management, strategic planning and monitoring between neighbouring local authorities
- To facilitate a strategic approach to landscape, ecological and climate change issues where these have cross-border significance
- To enable a sharing of information and views and, where appropriate, to facilitate joint working on strategic issues which affect more than one local authority area
- To facilitate joint research and procurement between neighbouring authorities
- To facilitate strategic co-operation and partnership on issues of shared interest with statutory consultees such as the Environment Agency, Natural England and Local Nature Partnerships and other key consultees including planning, delivering, managing and mitigating development and its impacts

### TOPIC ISSUES

The principal topics where co-operation are considered to be valuable are:

- Effective and timely consultation on planning applications, EIA Screening Opinions and Environmental Scoping Reports of cross-border significance in the South Pennines and related areas
- Development of mutually consistent databases on planning applications to enable “cumulative impact” issues to be addressed particularly on wind energy but also other technologies
- Consistent application of existing landscape character assessments such as the “Julie Martin Study” (or successor documents); the Peak District National Park Landscape Strategy and Action Plan and, as appropriate, other evidence base documents or cross-border landscape studies, when assessing planning proposals
- Joint procurement of evidence base documents and professional expertise where this would bring economies of scale and be mutually beneficial
- Procurement and implementation of proposals identified in Local Plan Sustainability Appraisals and Habitat Assessments such as Visitor Management Plans
- An approach to Planning Policy development and Development Management that takes into account as appropriate cross border effects on:
  - Landscape and visual impact
  - Cumulative impact
  - Historic landscape character
  - Ecology including flora, fauna and peat
  - Water supply, hydrology and flood risk
  - Recreational assets, bridleways and footpaths
  - Green infrastructure
  - Noise
  - Cultural and built heritage
  - Shadow Flicker
  - Socio-economic benefits

- Access and grid connections
  - Telecommunications and radar
- Co-operation on planning issues relating to the implementation of renewable networks such as District Heating schemes; energy from waste or biomass particularly where these are identified in studies such as the Greater Manchester, Yorkshire and Humber, Lancashire and East Midlands Renewable and Low Energy Studies and have clear cross-border affects
- Joint working as appropriate on policy development and implementation relating to low carbon development
- Consultation on Local Plan policies and SPD's beyond immediate neighbours where proposals are innovative or of wider interest
- Support as appropriate at Planning Inquiries
- Information sharing on current "good practice" at local and sub-regional level

#### **MECHANISMS FOR CO-OPERATION**

- Regular meetings will be held (at least 3 times per year) with special meetings if necessary, such as when triggered by an application of major cross-border significance or other specific issues of common interest
- Renewable energy databases will be regularly updated and circulated in particular to inform Local Authority Monitoring Reports
- Consultations on renewable energy planning applications, Screening Opinions and Environmental Scoping opinions with neighbouring planning authorities will occur in the following circumstances :
  - Affected neighbouring authorities where the Zone of Visual Influence shows an impact on land outside the host authority area
  - Where there are significant impacts on Recreational Trails of sub-regional or greater significance
- Consultations on non renewable energy applications and Environmental Scoping Opinions will be considered on a case by case basis
- Liaison on development of Planning Policy documents and SPD's
- Sharing of development management policies and validation requirements to facilitate a standardised approach to planning applications across the South Pennines

#### **LIMITATIONS**

The Local Authorities recognise that there will not always be full agreement with respect to all of the issues on which they have agreed to cooperate. For the avoidance of doubt, this Statement of Common Ground shall not fetter the discretion of any of the local authorities in the determination of any planning application, participation in evidence base studies or in the exercise of any of its statutory powers and duties.

Signed:

Organisation:

Position:

Date:

## **Annex One – Background Context**

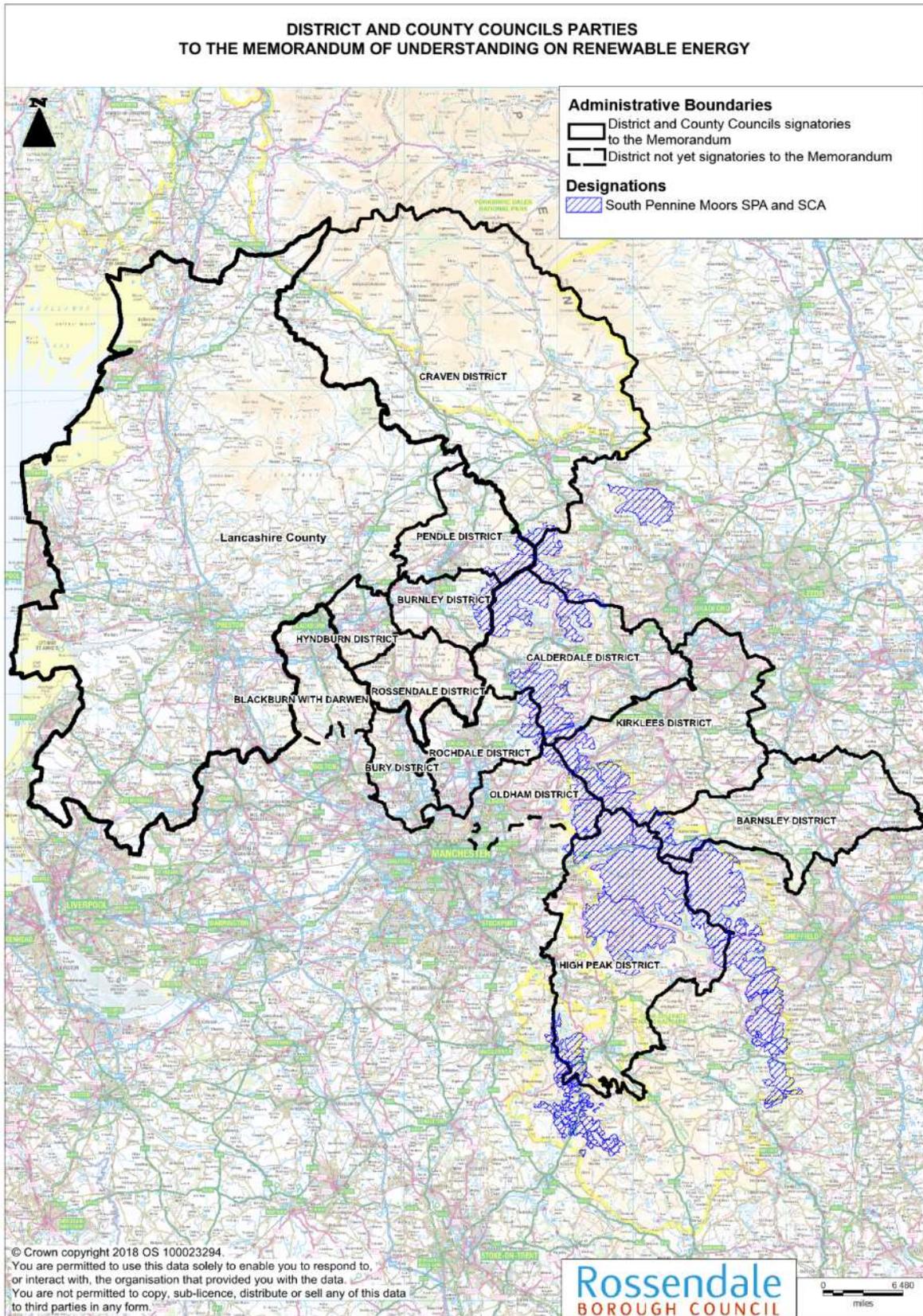
### **BACKGROUND**

The South Pennine landscape straddles the borders of Greater Manchester, Derbyshire, Lancashire and North, West and South Yorkshire. Upland areas are particularly attractive for renewable energy developments, ranging from wind farms to solar panels. While parts of the area such as the Peak District National Park, Forest of Bowland Area of Outstanding Natural Beauty and the South Pennine Special Protection Area/Special Area of Conservation are subject to national landscape or conservation designations substantial areas are not. Issues of cumulative impacts from proposals are a major cross-border issue. There is a history of cross-border consultation dating back to the early 1990's through the Standing Conference of South Pennine Authorities (SCOSPA).

In the recent past, wind energy development has been the major driver for cross border co-operation. However, with changing government policy to onshore wind generation this has become of less significance. There are however recognised to be broader benefits of co-operation on issues affecting the areas upland and valley landscape, which is a highly valued recreational and environmental asset.

# Appendix A to the Statement of Common Ground

## Map of the Area



## APPENDIX 3 –

### Statement of Intent for The South Pennines Regional Park



## A STATEMENT OF INTENT

### AIMS

- 1.** To be England's first non-statutory designated national landscape that is recognised, respected, and resourced by Government, public, private and third sectors, for its new, experimental and innovative approach to managing the environment for the 21st Century
- 2.** To develop a new model of landscape management that puts people, and not just legislation, at the heart of conserving, enhancing, protecting and investing in their place sustainably
- 3.** To co-create a new normal for delivery of sustainable development in the South Pennines Park that respects the life of all species

# PURPOSES FOR THE SOUTH PENNINES PARK

## Our purposes will be:

1. To demonstrate a sustainable economic, social and environmental approach to investment at a landscape scale
2. To positively promote the sustainable use of the natural, built and cultural assets of the South Pennines Park
3. To champion an inclusive and equal opportunities approach to engagement and investment that brings health and wellbeing benefits for people and communities
4. To enshrine the principles of biodiversity net gain at the heart of our thinking
5. To work with others to implement innovative approaches to sustainable land management, spatial planning, cultural and economic development
6. To invest in young people's potential to become the next generation of environmental advocates

## OUR ROADMAP IS THE 3 Rs

### Recognition

The significance of this undesignated nationally important landscape for the millions who live in and around it

### Respect

from society at large as we deliver an inclusive approach to managing our landscape

### Resources

Public monies for public benefit and a new way of funding environmental gain

## A PARK THAT DELIVERS

- Collaboratively for nature and people
- Sustainable development at a landscape scale
- A triple bottom line approach
- A link between public benefits for public finances
- The most accessible countryside in the UK
- A manifesto written by young people for young people
- Investing in a new normal

## THE SOUTH PENNINES PARK

We are at a watershed moment for our planet and its people. The challenges of Climate Change and significant biodiversity loss demand we all think again about how we do things. The opportunities presented by the 25 year Environment Plan, the Glover Review of Designated Landscapes and declarations of Climate Emergency at local and national level offer a potential road map for repositioning our environment at the centre of public life.

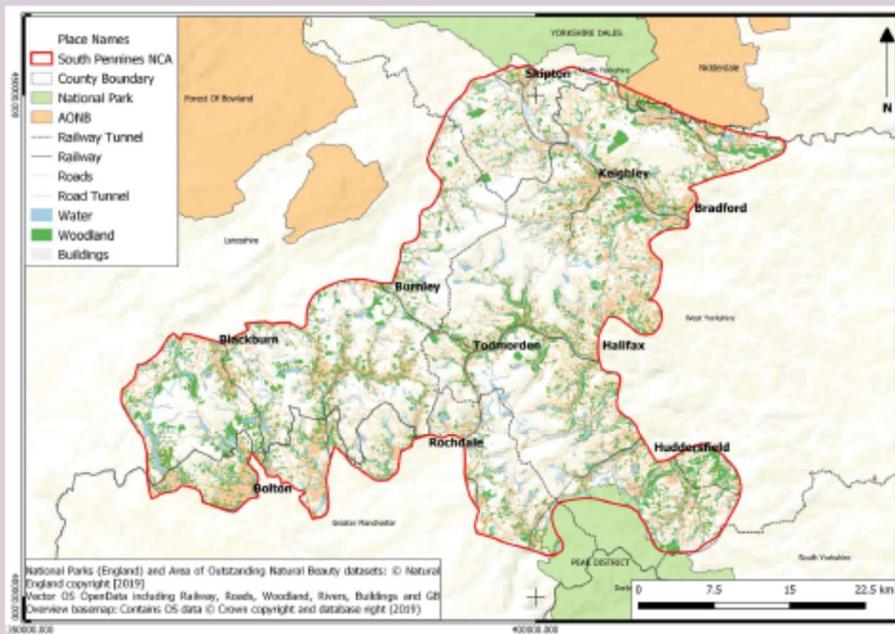
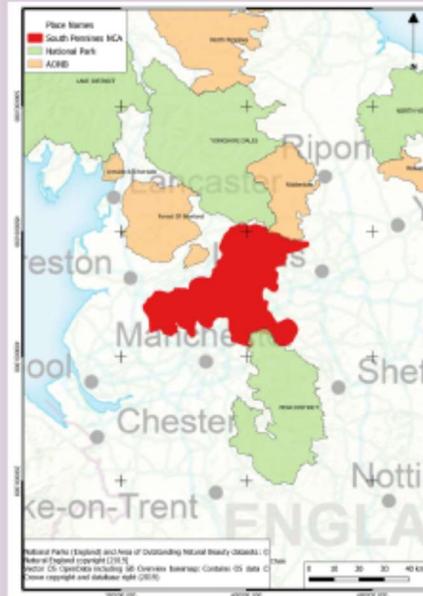
Public investment for public goods; a truly sustainable health service; environmental net gain as the norm in investment decisions and resilient local economies based on our natural and social capital must be at the heart of our management planning in the coming years.

**Our response to this is**

## A PEOPLE'S PARK FOR THE 21ST CENTURY

# THE SOUTH PENNINES PARK: WHERE ARE WE?

The South Pennines Park covers 460 square miles of spectacular upland country, bounded by the Peak District and Yorkshire Dales national parks, plus two areas of outstanding natural beauty (AONBs): Nidderdale and the Forest of Bowland. Located in northern England, and embracing parts of Yorkshire, Lancashire and Greater Manchester, it has a population of over 600,000 and is within a half hours journey time of eight million more.



## WHAT DO WE WANT TO DO?

The South Pennines is the only upland landscape in England not designated as a national park or AONB. It is rich in natural capital that offers substantial ecosystem services to society. The governance of the area on a landscape-scale is fragmented with multiple statutory authorities. Both climate change and devolution are likely to have big impacts on the South Pennines.

### We would like to explore:

- Bringing coherence to the governance of the South Pennines by defining and co-creating the South Pennines Park
- Facilitating meaningful collaboration and joint working between statutory and non-statutory authorities across sectors through leading the delivery of the South Pennines Park Partnership Plan, a management plan, that sets out the context for close cooperation and partnership work across public, private and third sectors and communities
- Building agency among people in the South Pennines Park to engage with their landscape and each other allowing them to become fully involved in the decision making process

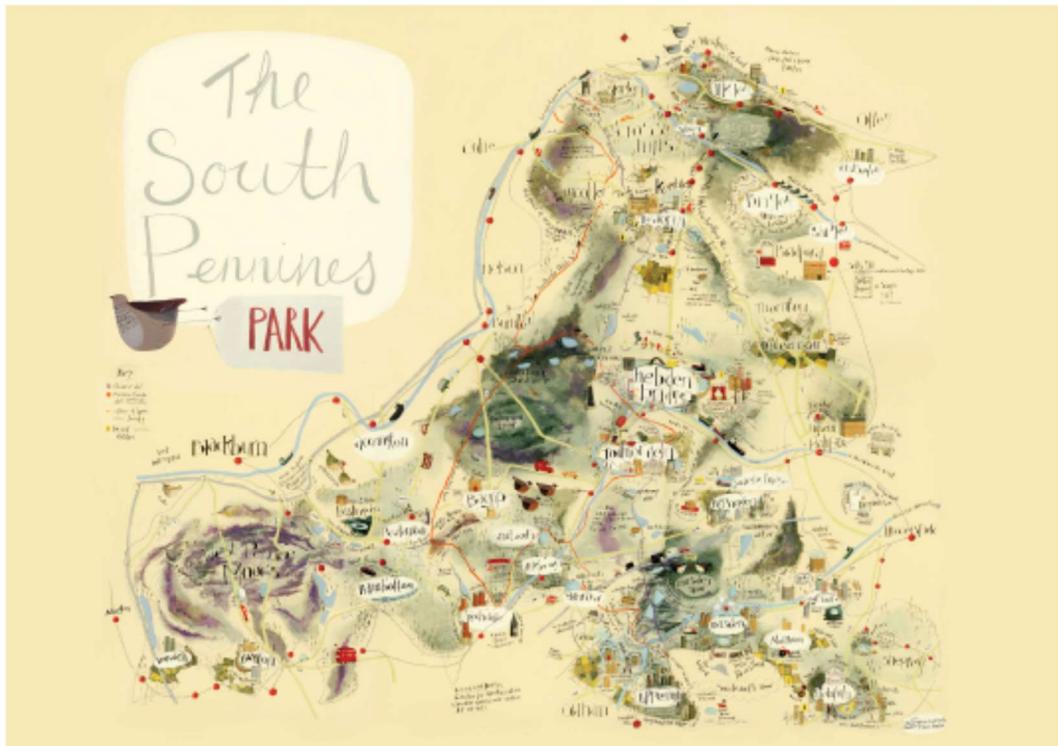
## WHY NOW?

*'The landscape is a key element of individual and social wellbeing, and ... its protection, management and planning entail rights and responsibilities for everyone'*

- European Landscape Convention

With the celebration of 70 years of protected landscapes through the National Parks and Access to the Countryside Act 1949 held throughout 2019, and the final publication of the Glover Landscapes Review in September 2019, the time is right to explore new ways of managing landscapes; including those significant non-statutory landscapes outside the protection of the 1949 Countryside Act. With shifting financial pressures across a number of sectors and the specific vulnerability of a non-designated landscape, it is now time to rethink how we secure the long term sustainable development of the South Pennines and its communities. We need to change the way we operate and find a different governance model and funding structure that builds resilience, and seek opportunities to provide innovative and practical solutions to tomorrow's social, environmental and economic challenges.

## PUTTING CONSERVATION AND PEOPLE AT THE HEART OF SUSTAINABLE DEVELOPMENT



 01422 264684

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 [WWW.PENNINEPROSPECTS.CO.UK](http://WWW.PENNINEPROSPECTS.CO.UK)

 [INFO@PENNINEPROSPECTS.CO.UK](mailto:INFO@PENNINEPROSPECTS.CO.UK)

**HEBDEN BRIDGE VISITOR CENTRE,  
BUTLERS WHARF, NEW ROAD,  
HEBDEN BRIDGE HX7 8AF**

**PENNINE PROSPECTS – SOUTHERN PENNINES  
RURAL REGENERATION COMPANY LTD**

Registered Company number: 05432174 (England and Wales)

## APPENDIX 4 –

### Email from Pennine Prospects

**From:** Helen Noble [mailto: ]  
**Sent:** 01 September 2020 13:04  
**To:** Nathaele Davies < >  
**Subject:** RE: Rossendale Local Plan - South Pennine Moors Visitor Management Plan

Hello Nathaele

Apologies for the slow response to your email, I have been on annual leave.

We are working with Natural England on the proposal for recognition of a new non-statutory designated national landscape – the South Pennines Park. This comes from the Government's Glover review of national parks and AONBs, published in October 2019 and ongoing work.

We have plans to produce a 15year South Pennines Park Partnership Plan, with 3x 5year Action Plans attached through consultation with stakeholders, communities and statutory agencies etc. This will be similar to national parks/AONBs management plans and will cover visitor management and looking after our statutory designated sites, as listed in NCA 36 Southern Pennines profile (Natural England).

We have requested an updated version of the MENE report for the South Pennines Park (SPP) from Natural England. We also have:

- Visitor Management survey – outdated, but plans to update across the SPP
- Socio-Economic Profile of the Park – current
- Recognition of the Park in all local plans and other infrastructure plans and strategies
- Government recognition of the Park as England's first non-statutory designated national landscape (we are the only upland in England not designated a national park or AONB and form the final piece of the jigsaw for the northern upland chain running from the Peak District National Park to the Scottish Borders)
- Principles of the Raynsford Review (working with TCPA through the SPP Partnership Plan)
- MENE report 2015
- Heritage Strategy – based on natural, built and cultural heritage
- Living Landscapes prospectus through the South Pennines Local Nature Partnership
- New Strategy & Business Plan 2021-2026

The aim is to start working on a landscape-scale and build recognition of the significance of the South Pennines Park and all its designations in all future statutory plans, programmes and strategies, on a similar basis as national parks/AONBs.

Happy to talk you through all the above if you need me to.

Helen

**Helen Noble**  
**Chief Executive**  
**Pennine Prospects**

[www.pennineprospects.co.uk](http://www.pennineprospects.co.uk)

## **Appendix 5 – HRA Technical Advice Note (November 2020)**

## External Memo: Technical Advice Note

|                 |   |
|-----------------|---|
| <b>To</b>       | Nathaele Davies, Rossendale Borough Council   |
| <b>From</b>     | Samantha Cheater, Lepus Consulting  |
| <b>Subject</b>  | Habitats Regulations Assessment<br>In-combination public access and disturbance effects       |
| <b>Code</b>     | LC-664_Rossendale_HRA_In-combination Effects  |
| <b>Date</b>     | 26 <sup>th</sup> November 2020  |
| <b>Revision</b> | 01<br>Updated to include Oldham Metropolitan Borough Council and GMSF site allocation numbers |
| <b>CC</b>       | Anne Storah, Rossendale Borough Council<br>Neil Davidson, Lepus Consulting                    |



### Summary

*This Technical Advice Note (TAN) provides further information regarding the Visitor Management Plan for the South Pennine Moors Phase 2 Special Protection Area (SPA) and South Pennine Moors Special Area of Conservation (SAC) as referred to in Policy ENV4 (Biodiversity, Geodiversity and Ecological Networks) of the submitted Local Plan.*

*A strategic approach to the consideration of visitor impacts at the SPA/SAC through strategic scale visitor surveys and a joint approach to the implementation of any potential visitor management / mitigation (through for instance a Visitor Management Plan) would be desirable. However, due to COVID-19 and associated delays it is understood that it has not been possible to progress a strategic level approach at this time.*

*Since the production of the March 2019 Habitats Regulations Assessment (HRA) for the Submission Version of the Local Plan, Rossendale Borough Council has been*

*made aware of an alternative approach taken by Calderdale Metropolitan Borough Council to the consideration of in-combination recreational impacts at the SPA/SAC. This uses best available survey data and draws on recent local plan numbers in neighbouring authority areas which were not available at the time of undertaking the March 2019 HRA for the Submission Version of the Local Plan.*

*Lepus has been commissioned by Rossendale Borough Council to undertake a similar assessment to inform the in-combination assessment under the Habitats Regulations.*

*This Technical Advice Note (TAN) revisits the assessment of potential recreational impacts associated with increased visitor numbers from the Rossendale Local Plan, in-combination with other plans and projects, upon the integrity of the SPA or SAC using the methodology adopted by Calderdale Metropolitan Borough Council.*

*Based on the findings of this exercise it can be concluded that there would be no adverse effect on site integrity at the SPA or SAC from the Rossendale Local Plan, either alone or in combination with other plans and projects. Consequently, a Visitor Management Plan would not be necessary. It is recommended that this TAN be shared with Natural England before submission to the Inspector or consultation on Main Modifications. The TAN can then form part of the consultation material.*

## **Introduction**

1. Habitats Regulations Assessment (HRA) is required under the Conservation of Habitats and Species Regulations 2017<sup>1,2</sup> (the Habitats Regulations). When preparing development plan documents, councils are required by law to carry out an HRA. The requirement for authorities to comply with the Habitats Regulations when preparing a local plan is also noted in the Government's online planning practice guidance<sup>3</sup>.
2. The HRA process assesses the potential effects of a plan or project on the conservation objectives of European sites designated under the Habitats<sup>4</sup> and Birds<sup>5</sup>

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<sup>1</sup> The Conservation of Habitats and Species Regulations (2017) SI No. 2017/1012, TSO (The Stationery Office), London. Available at: <https://www.legislation.gov.uk/ukdsi/2017/1012/contents> [Date Accessed: 28/07/20]

<sup>2</sup> The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573> [Date Accessed: 07/08/20]

<sup>3</sup> Ministry of Housing, Communities and Local Government (2019) Appropriate Assessment: Guidance on the use of Habitats Regulations Assessment. Available at: <https://www.gov.uk/guidance/appropriate-assessment> [Date Accessed: 28/07/20]

<sup>4</sup> Official Journal of the European Communities (1992). Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

<sup>5</sup> Official Journal of the European Communities (2009). Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds.

Directives. These sites form a system of internationally important sites throughout Europe known collectively as the 'Natura 2000 Network'.

3. European sites provide valuable ecological infrastructure for the protection of rare, endangered and/or vulnerable natural habitats and species of exceptional importance within the EU. These sites consist of Special Areas of Conservation (SACs), designated under European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the Habitats Directive), and Special Protection Areas (SPAs), classified under European Directive 2009/147/EC on the conservation of wild birds (the Birds Directive)<sup>6</sup>.

### Previous HRA work

4. In March 2019 an HRA Update was prepared in support of the Submission Version of the Rossendale Local Plan 2019 - 2034, hereafter referred to as the Local Plan<sup>7</sup>. This provided an update to previous HRA Appropriate Assessment work undertaken in 2018 in support of the Pre-Submission Version of the Local Plan<sup>8</sup>, which was informed by an HRA screening exercise undertaken in 2016<sup>9</sup>.
5. The 2019 HRA Update drew on data obtained by Natural England and approaches adopted in neighbouring authority areas to determine recreational impacts from increased visitor numbers at the South Pennine Moors Phase 2 SPA and South Pennine Moors SAC (hereafter referred to as the SPA/SAC) from the Local Plan. The nature of this data is described in **Paragraphs 6** and **7** below.
6. In 2014 Natural England, in partnership with Pennine Prospects<sup>10</sup>, commissioned a study on behalf of the South Pennines Local Nature Partnership. This study analysed survey data collected between 2009 and 2012 through the Monitor of Engagement with the Natural Environment (MENE) survey in order to better understand the profile of visits taken in the South Pennines amongst people living in the surrounding South Pennines Catchment Area<sup>11</sup>. This study provided 'visits per capita' estimates for local authorities at the South Pennine Moors. The study notes that 4.1% of those surveyed at the Moors were residents of Rossendale.

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<sup>6</sup> A European Marine Site is a European site (SPAs or SACs) so far as it consists of marine areas (are below the Mean High Water Mark) and to the 12nm limit of territorial seas.

<sup>7</sup> Lepus, 2019. Habitats Regulations Assessment of the Rossendale Local Plan (Submission Version).

<sup>8</sup> Lepus, 2018. Habitats Regulations Assessment of the Rossendale Local Plan. Appropriate Assessment.

<sup>9</sup> Lepus, 2016. Habitat Regulations Assessment of the Rossendale Local Plan, Screening Report.

<sup>10</sup> Pennine Prospects acts as the Local Nature Partnership for the South Pennines and attends the South Pennine Group of Authorities. It is a rural regeneration company set up in 2005 to champion the South Pennines and delivers projects aimed at promoting, protecting and enhancing the built, natural and cultural heritage of this area.

<sup>11</sup> Natural England, NECR150, Monitor of Engagement with the Natural Environment survey (2009 -2012): Visit taking in the South Pennines. Published 16 May 2014. <http://publications.naturalengland.org.uk/publication/4535521443315712>

7. Using population projections and the Local Plan forecasts, the 2019 HRA Update estimated the potential increase in visitor numbers at the SPA/SAC from Rossendale as a result of the Local Plan alone. These calculations took into consideration a 7km recreational zone of influence in line with the 2014 Natural England's study results. It also took into consideration the methods adopted in similar visitor patronage assessments by neighbouring local authorities, and in particular the approach adopted in the HRA of the Burnley Local Plan, the Bradford Core Strategy and the Kirklees Local Plan HRA (March 2017).
8. The 2019 HRA Update assessment of in-combination effects did not take account of all neighbouring authority growth within the 7km zone of influence as this data was not available at the time of writing. Instead, in lieu of empirical visitor survey data specifically for Rossendale, a qualitative approach was taken towards the assessment of in-combination effects, drawing on HRA data from neighbouring authority area local plans.
9. On the basis of the 2018 appropriate assessment, the 2019 HRA Update concluded the following in respect of visitor impacts:
  - Local Plan, alone: The Rossendale Local Plan will not have any adverse effect on site integrity at South Pennine Moors Phase 2 SPA or South Pennine Moors SAC, alone. The HRA noted that there would be a small-scale effect (0.14% increase over the Plan period) taking place in terms of recreational disturbance but concluded that this is unlikely to be significant.
  - Local Plan, in-combination with other plans: The HRA considered it unlikely that the Rossendale Local Plan would lead to adverse effects on site integrity at either the South Pennine Moors SAC or South Pennine Moors Phase 2 SPA in-combination with other plans and projects. However, taking a precautionary approach, and to overcome any uncertainty in terms of the qualitative in-combination assessment, the HRA, like neighbouring authority Burnley, recommended a Visitor Management Plan be prepared in partnership with neighbouring authorities and key stakeholders.
10. This recommendation was reflected in the Local Plan. The extract from the Local Plan relating to the Visitor Management Plan, taken from the Submission Version of the Local Plan, is set out below. It should be noted changes are proposed to this policy which will be consulted upon during the Main Modifications consultation.

***Policy ENV4: Biodiversity, Geodiversity and Ecological Networks***

***.....The Council will work with other authorities and partner organisations in the South Pennines to develop a Visitor Management Plan for the South Pennine Special Protection Area (SPA).***

**Purpose of this TAN**

11. Following the Examination hearings, the Council has been revisiting the requirement for a Visitor Management Plan in light of the change in housing numbers and new information available from Calderdale.
12. It is noted that Rossendale's housing number has decreased (within 7km of the SPA/SAC) since production of the 2019 HRA Update report, and in addition neighbouring authority local plans have been progressed. As noted above any changes to policies and housing numbers will be consulted upon during the Main Modifications consultation.
13. Calderdale Metropolitan Borough Council's Local Plan is currently at Examination stage and the HRA has likewise considered recreational impacts from housing allocations on the SPA/SAC. The Calderdale November 2019 HRA Update (undertaken to reflect additional housing supply) considered the recreational impact of visitors from allocated sites within a 7km buffer of SPA/SAC in Calderdale and its neighbouring authorities<sup>12</sup>. This was undertaken through reference to the Natural England 2014 Study.
14. In order to further quantify the in-combination effect of Rossendale's Local Plan in-combination with other plans and projects, this TAN provides an update to the 2019 HRA Update assessment of in-combination recreational impacts, based on the approach adopted by Calderdale and using up to date housing numbers and population projections provided by Rossendale Borough Council.

**In-combination assessment of recreational effects**

15. As noted in the 2019 HRA Update, the Local Plan for Rossendale proposes less development, at locations generally further away from the European sites, than most other local authorities in the area. Applying the assumption that 8km is the maximum

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<sup>12</sup> Calderdale Metropolitan Borough Council. 2019. Calderdale Local Plan Habitats Regulations Assessment: Recreational Use and Urban Edge Impacts.

distance that dog walkers are prepared to travel to the countryside<sup>13</sup>, a search of administrations that lie within this area around the borough and which are coincident with the two European sites has provided the study area for the in-combination assessment update. These neighbouring authority areas include the following:

- Rossendale;
- Burnley;
- Calderdale;
- Rochdale
- Oldham; and
- Pendle.

16. **Table 1** sets out places of residence of visitors to the South Pennines from these authority areas as obtained through the 2009-2012 MENE survey<sup>14</sup>.

**Table 1: Place of residence of visitors to the South Pennines, by local authority within study area<sup>15</sup>**

| Place      | Annual Volume of visit taken to South Pennines (millions) | % of all visitors to South Pennines | Per capita visits taken to the South Pennines |
|------------|---|-------------------------------------|---|
| Rossendale | 0.8   | 4.1%                                | 24  |
| Burnley    | 1.7   | 8.9%                                | 16  |
| Rochdale   | 0.3   | 1.7%                                | 2   |
| Oldham     | 0.2   | 0.8%                                | 1   |
| Pendle     | 1.6   | 8.1%                                | 14  |
| Calderdale | 0.5   | 2.3%                                | 3   |

17. The MENE survey data provides per capita annual visits taken to the South Pennines from each local authority in the HRA in-combination study area (**Table 1**). The number of new dwellings proposed within 7km of the SPA/SAC boundary (the zone of recreational influence – see **paragraph 7**) from each local authority is shown in **Table 2**. Using this data, average household size, household projection data and the 2018 mid-year estimates from the Office of National Statistics (ONS), the percentage

<sup>13</sup> As indicated in the NE MENE report around 68% of visitors to the South Pennines are “walking with a dog”. The survey also identified that people walking with a dog travelled no more than 8 km to reach their dog walking location.

<sup>14</sup> Ibid.

<sup>15</sup> Source: Extract from NE MENE report. Table 1.

of the total annual trips taken to the South Pennines has been calculated per authority area (Table 2).

**Table 2: Potential Visitor Trips from proposed new housing in Rossendale and Neighbouring Authorities within 8km and coincident with SAC/SPA<sup>16</sup>**

|                          | Estimated Population mid-2018 | Households Projection 2018 | Average household size | Annual volume of visits taken to South Pennines (m) (MENE Report) | % of visits taken to South Pennines | Per capita annual visits taken to South Pennines | New dwellings within 7km of edge of SPA/SAC designation | Total new persons | Total new visits per year | % of the total annual trips to South Pennines (20m) |
|--------------------------|-------------------------------|----------------------------|------------------------|---|-------------------------------------|--|---|-------------------|---------------------------|---|
| Burnley <sup>17</sup>    | 88,527                        | 37,952                     | 2.333                  | 1.7   | 8.9                                 | 16   | 1,331   | 3,105             | 49,675                    | 0.25  |
| Calderdale <sup>18</sup> | 210,082                       | 92,647                     | 2.268                  | 0.5   | 2.3                                 | 3  | 5,186   | 11,760            | 35,279                    | 0.18  |
| Oldham <sup>19</sup>     | 235,623                       | 93,128                     | 2.530                  | 0.2   | 0.8                                 | 1  | 3,107   | 7,861             | 7,861                     | 0.04  |
| Pendle <sup>20</sup>     | 91,405                        | 38,425                     | 2.379                  | 1.6   | 8.1                                 | 14   | 454   | 1,080             | 15,120                    | 0.08  |
| Rochdale <sup>21</sup>   | 220,001                       | 91,196                     | 2.412                  | 0.3   | 1.7                                 | 2  | 3,416   | 8,241             | 16,481                    | 0.08  |
| Rossendale <sup>22</sup> | 70,895                        | 30,489                     | 2.325                  | 0.8   | 4.1                                 | 24   | 871   | 2,025             | 48,607                    | 0.24  |
| <b>Total</b>             |                               |                            |                        |   |                                     |  |   |                   | <b>173,023</b>            | <b>0.87</b>   |

18. Rossendale will contribute 871 new dwellings within 7km of the SPA/SAC. Based on an average household size, this has been calculated to represent an additional 48,607 trips to the South Pennines, which equates to 0.24% of the 20 million annual visits.

19. When considered together, new housing within 7km of the SPA/SAC across all authority areas in the study area will generate an additional 173,023 visits to the South Pennines. This represents a 0.87% increase in the overall visitor trips generated to the South Pennines derived from sites within 7km of the SPA/SAC and located in the study area.

<sup>16</sup> Housing within 7km of SAC/SPA boundary provided by relevant Local Planning Authorities.

<sup>17</sup> Burnley Council (2018). Burnley's Local Plan and Policies Map. Available at: <https://www.burnley.gov.uk/residents/planning/planning-policy/burnleys-local-plan>

<sup>18</sup> Calderdale Metropolitan Borough Council (2019). Calderdale Local Plan Habitats Regulations Assessment. Recreational Use and Urban Edge Impacts. HRA. Available at: [http://www.calderdale.gov.uk/docs/local-plan/examination/HRA\\_NOV19.pdf](http://www.calderdale.gov.uk/docs/local-plan/examination/HRA_NOV19.pdf)

<sup>19</sup> Greater Manchester Combined Authority (2020). Greater Manchester Spatial Framework (GMSF) Publication Plan. Available at: <https://www.greatermanchester-ca.gov.uk/what-we-do/housing/gmsf2020/the-plan/> and Oldham Council (2011). The Local Development Framework Joint Core Strategy and Development Management Policies Development Plan Document (LDF DPD). Available at: [https://www.oldham.gov.uk/info/200708/unitary\\_development\\_plan/1005/about\\_the\\_unitary\\_development\\_plan](https://www.oldham.gov.uk/info/200708/unitary_development_plan/1005/about_the_unitary_development_plan)

<sup>20</sup> Pendle Borough Council (2015). Pendle Local Plan Part 1: Core Strategy 2011 - 2030. Available at: [https://www.pendle.gov.uk/downloads/file/8723/pendle\\_local\\_plan\\_part\\_1\\_core\\_strategy](https://www.pendle.gov.uk/downloads/file/8723/pendle_local_plan_part_1_core_strategy) and Email Planning Officer.. pers. comms: 16.10.2020

<sup>21</sup> Rochdale Borough Council (2018). Allocations Plan Draft Maps (Regulation 18). Available at: <http://rochdale.gov.uk/draftallocationsmaps> and Greater Manchester Combined Authority (2020). Greater Manchester Spatial Framework (GMSF) Publication Plan. Available at: <https://www.greatermanchester-ca.gov.uk/what-we-do/housing/gmsf2020/the-plan/>

<sup>22</sup> Rossendale Borough Council (2019). Matter 19 Housing Land Supply Update Oct 2019 (Document reference EL4.014). [https://www.rossendale.gov.uk/downloads/file/15625/el4014\\_matter\\_19\\_housing\\_land\\_supply\\_update\\_oct\\_2019](https://www.rossendale.gov.uk/downloads/file/15625/el4014_matter_19_housing_land_supply_update_oct_2019)

20. A study was undertaken on behalf of Natural England in 2016 which considered the potential impact of small-scale effects at European sites<sup>23</sup>. This indicated that a number of factors are important when determining the significance of such effects as follows:
- The characteristics of the qualifying feature (for example, rarity, location, distribution, vulnerability to potential change);
  - How the ecological structure and function of the site might be affected;
  - What ecological function the affected area is performing, or could perform, in terms of the ecological requirements of the qualifying features;
  - The location of the affected area both in terms of its geographic position in the designated site and in terms of its position relative to the project; and
  - Where a qualifying species is affected, when the activities would occur, the rarity of individuals of the species, its conservation status and future prospects in the location in question.
21. As a proportion of existing levels, the increase in annual visits would be likely to be relatively negligible constituting a combined 0.87% increase. The SPA is approximately 21,000ha in size with the SAC covering approximately 66,207ha. It is therefore noted that the additional annual visits will be distributed across several thousand hectares of land, with a very low increase in annual visits when considered 'per hectare'.
22. As set out in the 2019 HRA Update, moorlands in England are typically managed for grouse shooting or sheep farming. Natural England suggests that 14% of moorland SSSIs in England are in a favourable condition, the main causes for the lack of favourability being overgrazing and inappropriate burning<sup>24</sup>. These causes are beyond the influence of the Local Plan.
23. Section 7.5 of the 2019 HRA Update outlines existing management frameworks which are in place in the South Pennine Moors to protect the natural environment and manage pressures. These include frameworks and partnerships such as the Peak District National Park Management Plan, the South Pennines Local Nature Partnership run via Pennine Prospects and the Moors for the Future Partnership.

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<sup>23</sup> Natural England. 2016. Commissioned Report NECR205. Small-scale effects: How the scale of effects has been considered in respect of plans and projects affecting European sites - a review of authoritative decisions. Available at: <http://publications.naturalengland.org.uk/file/5158169750798336>

<sup>24</sup> Moors for the Future Partnership, Sustainable Uplands & Moors for the Future Research Note No. 14. Available online at: <http://www.moorsforthefuture.org.uk/sites/default/files/documents/MFF%20RN14%202007%20Looking%20after%20grouse%20moor%20habitats.pdf>

24. The MENE survey data indicated that 75% of visits taken to the South Pennines were to the countryside (paths, cycleways or bridleways, woodland or forestry, a river, lake or canal or other open spaces in the countryside), with 25% of visits taken to green places in a town or city. Whilst data is not available to validate this assumption, based on a review of similar sites, it is likely that there will be larger numbers of visitors to honey pots sites, such as popular walking paths, renowned views or areas with good car parking and / or facilities.

## Conclusions

25. The in-combination impact is considered to be small scale in nature and is unlikely to result in an adverse effect on the site integrity of the SPA/SAC, as a result of increased recreational pressure. It can therefore be concluded that the Local Plan would not lead to an adverse effect on site integrity at the SPA/SAC in-combination with other plans and projects.
26. Whilst Rossendale will continue to support all work undertaken to develop a strategic approach to the mitigation of recreational impacts through the Pennine Prospect work<sup>25</sup>, following this review of current Local Plan and neighbouring authority housing numbers in the context of existing survey data, the implementation of a Visitor Management Plan is not considered necessary for the delivery of the Local Plan.

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<sup>25</sup> To inform the ongoing management and help further understand the potential effects of visitors on the SPA and SAC designated areas, and all future HRA work in and around the two European sites, it is desirable that a joint strategic approach amongst LPAs that are near to or coincident with these protected areas be pursued.

To this end, Pennine Prospects is leading on the production of a 15 Year South Pennines Park Partnership Plan (with three consecutive 5-Year Action Plans) which will ensure due care of statutory designated sites as identified in the National Character Area (NCA) 36 Southern Pennines profile by Natural England. This will be prepared in consultation with stakeholders, communities and statutory agencies and will be similar to a national park/area of outstanding natural beauty (AONB) management plan. Rossendale will continue to support all work undertaken to develop this strategic approach.

**Appendix 6 – Natural England’s comments to the HRA Technical Advice Note (November 2020)**

[REDACTED]

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**From:** Baguley, Janet [REDACTED]  
**Sent:** 30 November 2020 11:27  
**To:** Nathaele Davies  
**Cc:** Anne Storah  
**Subject:** RE: HRA - and Visitor Management Plan for the S Pennines

Hi Nathaele,

Since the in-combination total still sits at under 1% I confirm that our previous comments still apply.

Kind Regards

Janet Baguley  
Lead Adviser – Greater Manchester & Merseyside;  
Cheshire, Greater Manchester, Merseyside & Lancashire Area  
Natural England  
2nd floor, Arndale House, Manchester Arndale  
Manchester, M4 3AQ  
Landline: [REDACTED]  
Mobile: [REDACTED]  
[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

During the current coronavirus situation, Natural England staff are working remotely to provide our services and support our customers and stakeholders. All offices and our Mail Hub are closed, so please send any documents by email or contact us by phone or email to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.



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**From:** Nathaele Davies [REDACTED]  
**Sent:** 30 November 2020 10:13  
**To:** Baguley, Janet [REDACTED]  
**Cc:** Anne Storah [REDACTED]  
**Subject:** RE: HRA - and Visitor Management Plan for the S Pennines

Hi Janet,

Thanks again for your feedback regarding the Technical Advice Note from Lepus and the Council's note to the Inspector.

I would like to inform you that the Technical Advice Note (TAN) has since been updated to include Oldham's and GMSF's site allocations (for Oldham and Rochdale). The conclusions of the assessment remain unchanged and it is still considered that the in-combination impact of

increased recreational pressure is unlikely to result in adverse effect on the site integrity of the SPA/SAC (please see the updated TAN attached).

Could you please confirm if your previous comments still apply?

Many thanks,

Regards,

Nathaele Davies  
Senior Planning Officer  
Forward Planning  
Rossendale Borough Council  
Telephone: [REDACTED]  
Website: [www.rossendale.gov.uk](http://www.rossendale.gov.uk)



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**From:** Baguley, Janet [REDACTED]  
**Sent:** 12 November 2020 14:33  
**To:** Nathaele Davies [REDACTED]  
**Cc:** Anne Stora [REDACTED]  
**Subject:** RE: HRA - and Visitor Management Plan for the S Pennines

Hi Nathaele,

We have reviewed the attached Technical Advice Note and the note to the Inspector. Natural England are satisfied with the methodology used to assess the impacts to recreational disturbance to the South Pennine Moors Phase 2 SPA and South Pennine Moors SAC and with the overall conclusion drawn. We support the commitment from the Council to engage with Pennine Prospects on the Visitor Management Plan in the future.

Kind Regards

Janet Baguley  
Lead Adviser – Greater Manchester & Merseyside;  
Cheshire, Greater Manchester, Merseyside & Lancashire Area  
Natural England  
2nd floor, Arndale House, Manchester Arndale  
Manchester, M4 3AQ  
Landline: [REDACTED]  
Mobile: [REDACTED]  
[www.gov.uk/natural-england](http://www.gov.uk/natural-england)

During the current coronavirus situation, Natural England staff are working remotely to provide our services and support our customers and stakeholders. All offices and our Mail Hub are closed, so please send any documents by email or contact us by phone or email to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.