West Yorkshire Combined Authority Local Nature Recovery Strategy comments from UCWN

P3/35: We do not agree with the wording of Objective no 2. There are times where so called sustainable land uses will conflict with the objectives of nature restoration and it is important that this is understood and acknowledged. An example of this would be where 'sustainable' green energy is proposed on sites of great importance for nature, in particular proposals for wind energy, solar power and battery energy systems on protected peatlands where there would be extremely serious consequences for nature if these went ahead. These conflicts must be recognised and this nature recovery strategy should champion the cause of nature in these circumstances, as there are always other places where the proposals could go, however there is nowhere else for irreplaceable habitat and the species associated with them to go.

BUILT ENVIRONMENT

B1

MO2 in managing urban woodlands, thinning and crown reduction is a vital part of creating healthy woodlands, particularly selecting which trees should be retained and which should go, understanding the needs of different species is very important, oak which should be a priority tree to establish in West Yorkshire requires light conditions to establish, and will not thrive in the shade of other trees e.g. sycamore. Thinning and tree removal must be explained to the public when carried out in publicly accessible areas.

NO2 Consider using species rich amenity grassland mixes too, which incorporate low growing native wildflower species to give a shorter sward that is still of benefit to pollinators

SO2 Mandate the use of fences with hedgehog gaps at the base to enable hedgehogs access throughout gardens in suburban areas

SO6 Work with organisations such as Tidy Britain who run the Green Flag Award for parks and green spaces, their objectives align with those set out in this LNRS. Promote the understanding and development of green infrastructure to link existing green spaces.

S18 Encourage pick up of pooh in all area when pets have been treated with insecticide and vermicides.

S19 Many parks have Friends of Groups who are actively engaged in environmental work and maintenance within parks, they can drive refurbishment and care of cash strapped parks, but often are mostly retired people, and younger people need to be involved to ensure succession.

B2

NO4 Use native hedgerows at the interface between all new development and open countryside and avoid fences.

B5

NO2 Discourage paving over front gardens and make best practice ideas available which show how some planting can be retained even if carparking has to be accommodated. Strongly discourage the use of artificial grass: which apart from anything else is so unhygienic!

GRASSLANDS

G1

SO7 Understand the links between peatlands and CHEGD grasslands. The hydrological systems created by upland blanket bog supports healthy populations of scarce and vulnerable fungi.

G3

MO3 Understand the important flora which exists in a narrow band along the clay lined canals and particularly in the gritstone and coal measures landscapes, where the native soil is acid, these narrow strips may be the only representation of a neutral or slightly alkaline habitat in an area.

SO2 Encourage land managers to switch to new cut and collect mowing machinery that can cope with a much heavier cut, and doesn't clog instantly.

TREES AND WOODLAND

T1

MO1 Ensure tree planting schemes are not numbers driven. There is a culture of trying to plant as many trees as possible sometimes, leading to poor quality. Tree planting and woodland creation should be about the area of good quality woodland created, and not the number of trees planted. There is an unfortunate trend for planting trees much too densely and then not managing them adequately afterwards. After three years trees planted at 1 per metre, will need two thirds of the trees removing. This is a terrible waste of resources, and if not thinned a poor, cramped woodland of etiolated trees will establish.

Consider greater use of species such as small leaved lime, black poplar and wych elm where conditions are appropriate, which will partly compensate for widespread loss of Ash.

SO1 Reinforce the message that existing mature trees are so much more valuable than new trees in terms of the biodiversity value and the number of host species - it can take 30 years for a 'new 'tree to get close to the number of species hosted compared to a mature particularly veteran tree, and other benefits such as shade and pollution control due to interception of pollutants and dust are also much reduced with new trees.

Consider effective management of invasive species particularly Himalayan balsam which causes serious damage to native ground flora and causes soil erosion.

T2

MO5 Grey squirrels are increasingly responsible for major damage of deciduous trees causing significant losses in West Yorkshire. The promotion of reds and discouragement of greys is very important for woodland habitats.

T3

MO3 Develop skills in woodland management, understand the benefits of underused techniques such as pollarding and coppicing.

UPLANDS

U1

While we strongly agree with the description, the fact that blanket bog is an irreplaceable habitat should be stated here.

As well as storing carbon upland peatlands in a favourable conservation state also actively capture carbon, naturally filter water ensuring drinking water supplies are protected, and provide habitats for a huge number of creatures, not just the internationally recognised assemblage of moorland breeding birds.

U1 measures should include preventing the industrialisation of peatlands for renewable energy, particularly windfarms but also solar energy and Battery Storage Energy Systems and the large scale infrastructure required to enable these is completely incompatible with the protection and functioning of this habitat, and the restoration of all peatlands to favourable conservation status. This should be carried out through the WYCA Strategic Development Strategy which this LNRS will inform.

Windfarm development results in inevitable and irreparable damage to upland peatland hydrology. Drainage works, both intended and unintended caused by access route construction, underground cable connections, turbine foundations, crane hard standings etc, cause extensive damage far beyond the footprint of any works because the peatland is an interconnected mosaic of wetland habitat. It is essential that the LNRS and the Strategic Development Strategy rule out upland peatland as a site for windfarms and other renewable energy infrastructure.

We strongly agree with the assertion that shallow peat needs attention as well as deep peat, and is even more vulnerable than deep peat to damage. We consider that peatland of any depth is inappropriate for windfarm development which should be located on mineral soils.

We would stress that while developers may consider the peat uplands as a great place to build windfarms because of the wind resource, there are other places free of peat where these can be built, meanwhile the vulnerable and internationally protected breeding birds that live on the peatlands CANNOT move elsewhere, and these West Yorkshire moorlands are for many species one of their remaining refuges.

Natural England's new Definitions of Favourable Conservation Status for blanket bog and heathland should be embedded in the WYCA LNRS, this states that irreplaceable blanket bog doesn't just occur on deep peat (>.3m) but also on shallow peat (up to 0.3m)

MO1 We are not sure that the lag habitat using Phragmites australis is appropriate for UPLAND peat areas, we think this perhaps relates to LOWLAND peat areas.

SO1 Recognise that the perceptual value of the moorlands for both people in West Yorkshire, and the wider region is very important. Even if people don't visit, it is reassuring to many that the moors are there. This is a widely researched area and is important for well being.

U3

SO2 Climate change is affecting the breeding times of many birds and land managers and farmers need to be able to quickly adapt management of meadows to ensure changes in breeding times are accommodated where possible.

QUALITY AND CONDITION

Q1

Compel all local authorities to adopt dark skies guidance: this is not just good for wildlife it is energy efficient. Policies and guidance should concur with those adopted by North Yorkshire and the Yorkshire Dales

Q2 Protect soil health by allowing leaf matter to be recycled into soils in public parks and open spaces, except where areas of grass need to be kept clear for sport or access, leaves should be allowed to drawn back into the soil.

Q3 Regionwide strategy is required to tackle Himalayan balsam from the top of the catchment in the westernmost parts of WY downstream. Liaison with organisations such as Canal and Rivers Trust to prioritise balsam removal rather than carrying out over zealous grass cutting for instance.

SPECIES

S1

When discussing pollinators include wasps as pollinators, they are demonised because they are 'badly behaved' for a couple of months of the year and provide valuable ecosystem services but remain unpopular and victimised.

NO2 Curlew, NO3 Lapwing, NO4 Redshank NO5 Snipe All are threatened by loss of breeding habitat from the potential industrialisation of peatlands by renewable energy development particularly wind energy. They would be permanently displaced by disturbance to breeding areas during wind farm construction and subsequent turbine operations. Curlew are known to avoid breeding within 400 m of wind turbines.

PB 16.11.25