

# Sustainability Appraisal and Strategic Environmental Assessment of the Rossendale Local Plan 2019-2036

## Post-Adoption Statement

December 2021



**LEPUS** CONSULTING  
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY



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# Acronyms and Abbreviations

<b>AADT</b>	Annual Average Daily Traffic
<b>AMR</b>	Authority Monitoring Report
<b>DBEIS</b>	Department for Business, Energy & Industrial Strategy
<b>DfT</b>	Department for Transport
<b>GHG</b>	Greenhouse Gas
<b>GP</b>	General Practice
<b>HRA</b>	Habitats Regulations Assessment
<b>IWS</b>	Important Wildlife Site
<b>LCT</b>	Landscape Character Type
<b>LSE</b>	Likely Significant Effect
<b>MHCLG</b>	Ministry for Housing, Communities & Local Government
<b>NPPF</b>	National Planning Policy Framework
<b>PPG</b>	Planning Practice Guidance
<b>RA</b>	Reasonable Alternative
<b>RBC</b>	Rossendale Borough Council
<b>RLP</b>	Rossendale Local Plan
<b>RTPI</b>	Royal Town Planning Institute
<b>SA</b>	Sustainability Appraisal
<b>SAC</b>	Special Area of Conservation
<b>SEA</b>	Strategic Environmental Assessment
<b>SSSI</b>	Site of Special Scientific Interest
<b>SPA</b>	Special Protection Area

# 1 Introduction

## 1.1 Context and purpose of this report

- 1.1.1 This report comprises the Sustainability Appraisal Post-Adoption Statement for the Rossendale Local Plan 2019-2036. It has been prepared under Regulation 16 of the Strategic Environmental Assessment Regulations (SI 1633) 2004<sup>1</sup>.
- 1.1.2 The Rossendale Local Plan (RLP) has been prepared by Rossendale Borough Council (RBC) with the aim of positively planning for growth and development within the borough. The Local Plan is a development strategy covering 17 years for homes, jobs, leisure, transport and infrastructure, plus local parks and open spaces.
- 1.1.3 During the preparation of the RLP, the council was required to carry out a Sustainability Appraisal (SA) of the Local Plan. SA is a statutory process incorporating the requirements of the Strategic Environmental Assessment (SEA) Directive<sup>2</sup>.
- 1.1.4 The purpose of this Post-Adoption Statement is to outline how the SEA process has informed and influenced the Local Plan development process, and to demonstrate how consultation on the SEA has been taken into account.

## 1.2 Rossendale Borough

- 1.2.1 Rossendale is situated in East Lancashire, bordering Bury, Hyndburn, Burnley, Todmorden and Rochdale. The area is around 13,800 hectares in size, covering about 4.8% of Lancashire as a whole. Rossendale has four main towns: Rawtenstall, Haslingden, Rawtenstall, and Whitworth. With a population of just over 69,000, growing year on year, Rossendale is a vibrant industrial area with quaint villages and independent high streets. The area is going through large-scale regeneration and also heritage preservation.
- 1.2.2 Rawtenstall is the largest town the borough with a population of 23,000. Located just over 17 miles north of Manchester, it has good road connections via the A56. It is a typical Lancashire town boasting cobbled streets, stone architecture and dramatic landscape. Bank Street in Rawtenstall is a fantastic shopping experience for those keen to celebrate local, independent businesses. It provides a great opportunity to shop local and experience a different shopping offer to many other towns. Rawtenstall is also the home of the last Temperance Bar in England, Fitzpatrick's, which has been making cordials and drink since 1899. Rawtenstall also boasts a successful and thriving market. There are monthly Farmers and Clog Markets on the Town Square in the centre of Rawtenstall.

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<sup>1</sup> The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uk/si/2004/1633/contents/made> [Date Accessed: 02/12/21]

<sup>2</sup> SEA Directive. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Date Accessed: 02/12/21]

- 1.2.3 Haslingden, set among the hills and moorland of East Lancashire, is one of the county's highest towns. It is a bustling town with a host of shops, both traditional and contemporary, surrounded by beautiful countryside. It has the oldest recorded history of any of the borough's towns and achieved borough status in 1891. It is the home of the famous Hollands Pies, loved by many in the area and further afield. Stone from the quarries around Haslingden has been used in many famous locations including the paving slabs in Trafalgar Square, London.
- 1.2.4 The Town of Bacup is situated to the east of the Borough of Rossendale. The town centre is 835 feet above sea level. The eastern boundary of Bacup is not only the Rossendale boundary but also the Lancashire/Yorkshire boundary. It has been described as a remarkable survivor given that it remains much as it was at the turn of the 20<sup>th</sup> century and it is regarded as one of the best-preserved mill towns in the country. Bacup is packed full of heritage features, harking back to its industrial past. In the quaint streets there are great local shops and a traditional market open on Wednesdays and Saturdays. Bacup is home to Bacup Natural History Museum, Bacup Royal Court Theatre and the famous Britannia Coconutters. Stubblee Park, just outside the town centre, is a large park combining many historical features with modern facilities including a play area, outdoor gym, bowling greens, tennis courts and a newly opened off road cycling 'pump track'. Lee and Cragg Quarry mountain bike trails are located just outside Bacup.
- 1.2.5 Whitworth is a thriving town, nestled in the foothills of the Pennines, between the towns of Bacup to the north and Rochdale to the south. Whitworth sits right on the tip of the Lancashire boundary, bordering Greater Manchester to the south (Rochdale), with West Yorkshire just over the easterly hills in Todmorden. Whitworth covers an area of around seven square miles and follows the old 18th century turnpike road which linked Manchester to Skipton. Whitworth achieved the status of borough in 1894 and still retains its own Town Council dealing with local issues whilst having four members on the Borough Council of Rossendale. Whitworth Town Council's Tourism and Leisure Committee organises a number of events in the town including the annual Rushcart, Scarecrow festival and New Year's Day Duck Race. At the southern end of Whitworth is the only designated Nature Reserve, Healey Dell.
- 1.2.6 **Figure 1.1** shows the location of the main towns in Rossendale Borough and illustrates the principal spatial proposals as set out in the submission version of the Local Plan.



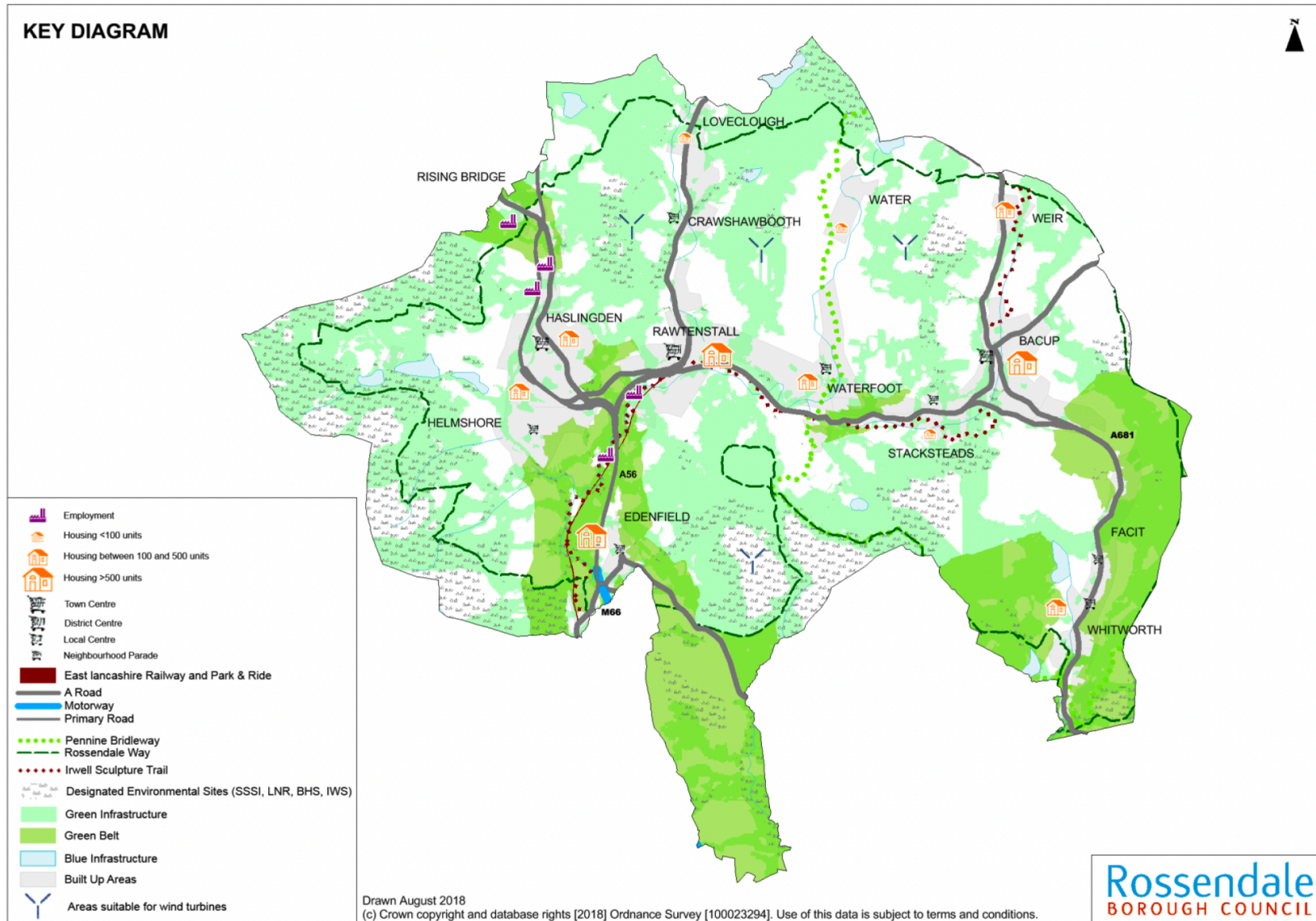


Figure 1.1: Rossendale's Key Diagram (Rossendale Local Plan Submission Version, 2018)



## 1.3 Requirement for the SEA Post-Adoption Statement

- 1.3.1 In order to meet the legislative requirements of the European Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes (2004), a Post-Adoption Statement is required to be published “*as soon as reasonably possible after the Plan has been adopted*”<sup>3</sup>.
- 1.3.2 SEA Regulation 16<sup>4</sup> sets out the post-adoption procedures, including the requirement to produce a statement containing a number of particulars (Regulation 16 Paragraph 4). **Box 1.1** presents the requirements of this SEA Post-Adoption Statement.
- 1.3.3 Following best practice guidance, RBC incorporated the SEA into the SA of the RLP. This Post-Adoption Statement provides sustainability information beyond the strict environmental parameters outlined in **Box 1.1**, to reflect the broader sustainability appraisal process.

## 1.4 Using this document

- 1.4.1 This Post-Adoption Statement should be read alongside the RLP 2019 - 2036 and associated SA documents, which are summarised in **Chapter 2** and can be found on the RBC website.
- 1.4.2 This report has been prepared in order to meet the requirements of the SEA Regulations. The chapters are structured as per the criteria presented in **Box 1.1**:
- **Chapter 2** presents how environmental considerations have been integrated into the RLP;
  - **Chapter 3** presents why the adopted Local Plan was chosen, in light of reasonable alternatives;
  - **Chapter 4** presents how the Environmental Report has been taken into account;
  - **Chapter 5** presents how opinions of consultation bodies have been taken into account; and
  - **Chapter 6** presents how the environmental and sustainability effects of the Local Plan may be monitored.

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<sup>3</sup> RTPI (2018) RTPI Practical Advice: Strategic Environmental Assessment – Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date Accessed: 02/12/21]

<sup>4</sup> The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/uksi/2004/1633/part/4/made> [Date Accessed: 02/12/21]

### Box 1.1: SEA Regulation 16 Post-Adoption Procedures<sup>5</sup>

#### Information as to adoption of plan or programme

16.—

- 1) As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall—
  - a) make a copy of the plan or programme and its accompanying environmental report available at its principal office for inspection by the public at all reasonable times and free of charge; and
  - b) take such steps as it considers appropriate to bring to the attention of the public—
    - i) the title of the plan or programme;
    - ii) the date on which it was adopted;
    - iii) the address (which may include a website) at which a copy of it and of its accompanying environmental report, and of a statement containing the particulars specified in paragraph (4), may be viewed or from which a copy may be obtained;
    - iv) the times at which inspection may be made; and
    - v) that inspection may be made free of charge.
- 2) As soon as reasonably practicable after the adoption of a plan or programme—
  - a) the responsible authority shall inform—
    - i) the consultation bodies;
    - ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and
    - iii) where the responsible authority is not the Secretary of State, the Secretary of State; and
  - b) the Secretary of State shall inform the Member State with which consultations in relation to the plan or programme have taken place under regulation 14(4), of the matters referred to in paragraph (3).
- 3) The matters are—
  - a) that the plan or programme has been adopted;
  - b) the date on which it was adopted; and
  - c) the address (which may include a website) at which a copy of—
    - i) the plan or programme, as adopted,
    - ii) its accompanying environmental report, and
    - iii) a statement containing the particulars specified in paragraph (4), may be viewed, or from which a copy may be obtained.
- 4) The particulars referred to in paragraphs (1)(b)(iii) and (3)(c)(iii) are —
  - a) how environmental considerations have been integrated into the plan or programme;
  - b) how the environmental report has been taken into account;
  - c) how opinions expressed in response to—
    - i) the invitation referred to in regulation 13(2)(d);
    - ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;
  - d) how the results of any consultations entered into under regulation 14(4) have been taken into account;
  - e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
  - f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

<sup>5</sup> The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/uksi/2004/1633/part/4/made>  
[Date Accessed: 06/12/21]

## 2 Overview of the assessment process

### 2.1 Integrated approach to SA and SEA

- 2.1.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.
- 2.1.2 The SEA Directive applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *“the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”*.
- 2.1.3 The SEA Directive has been transposed into English law by the SEA Regulations. Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the RLP to be subject to SEA throughout its preparation.
- 2.1.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004<sup>6</sup> and should include an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA can also be found in the Town and Country Planning Regulations<sup>7</sup>. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.

### 2.2 Best Practice Guidance

- 2.2.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal process, which incorporates the requirements of the SEA Directive. This can be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance including the following:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment<sup>8</sup>.
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive<sup>9</sup>.

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<sup>6</sup> Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date Accessed: 06/12/21]

<sup>7</sup> Town and Country Planning Act 1990 Available at: <https://www.legislation.gov.uk/ukpga/1990/8/contents> [Date Accessed: 06/12/21]

<sup>8</sup> European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: [http://ec.europa.eu/environment/archives/eia/pdf/030923\\_sea\\_guidance.pdf](http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf) [Date Accessed: 06/12/21]

<sup>9</sup> Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf) [Date Accessed: 06/12/21]

- Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework (NPPF)<sup>10</sup>.
- Ministry of Housing, Communities and Local Government (2021) Planning Practice Guidance (PPG)<sup>11</sup>.
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans<sup>12</sup>.

## 2.3 SA and the sequential plan making process

2.3.1 The SA (incorporating SEA) process has accompanied the plan making process and has informed the different stages of plan making on an iterative basis. The key stages and outputs are as follows

- SA Scoping Report (2012)<sup>13</sup>;
- SA of the Draft Local Plan (Regulation 18) (May 2017)<sup>14</sup>;
- SA of the Publication Local Plan (Regulation 19) (August 2018)<sup>15</sup>;
- SA Addendum to the Regulation 19 SA Report (March 2019)<sup>16</sup>; and
- SA of the Proposed Main Modifications (September 2021)<sup>17</sup>.

2.3.2 **Table 2.1** sets out the stages of preparation of the RBC Local Plan and the accompanying stage of SA where relevant.

<sup>10</sup> MHCLG (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>  
[Date Accessed: 06/12/21]

<sup>11</sup> Department for Levelling Up, Housing & Communities and MHCLG (2021) Planning practice guidance. Available at:  
<https://www.gov.uk/government/collections/planning-practice-guidance> [Date Accessed: 06/12/21]

<sup>12</sup> RTPI (2018) RTPI Practical Advice: Strategic Environmental Assessment – Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date Accessed: 25/09/21]

<sup>13</sup> Rossendale Borough Council (2012) Scoping Report, Lives and Landscapes: Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulations Assessment

<sup>14</sup> Lepus Consulting (2017) Sustainability Appraisal of the Rossendale Local Plan Reasonable Alternatives: Final SA Report May 2017. Available at:  
[https://www.rossendale.gov.uk/downloads/file/13688/sustainability\\_appraisal\\_of\\_the\\_local\\_plan\\_2017](https://www.rossendale.gov.uk/downloads/file/13688/sustainability_appraisal_of_the_local_plan_2017) [Date Accessed: 06/12/21]

<sup>15</sup> Lepus Consulting (2018) Sustainability Appraisal and Strategic Environmental Assessment of the Rossendale Borough Council Local Plan: Regulation 19 SA Report August 2018. Available at:  
[https://www.rossendale.gov.uk/downloads/download/11170/sustainability\\_appraisal\\_of\\_the\\_rossendale\\_draft\\_local\\_plan\\_pre-submission\\_publication\\_version\\_2018](https://www.rossendale.gov.uk/downloads/download/11170/sustainability_appraisal_of_the_rossendale_draft_local_plan_pre-submission_publication_version_2018) [Date Accessed: 06/12/21]

<sup>16</sup> Lepus consulting (2019) Sustainability Appraisal of the Rossendale Borough Local Plan 2019 – 2034: Addendum to the Regulation 19 SA/SEA Report March 2019. Available at: [https://www.rossendale.gov.uk/downloads/download/11171/sustainability\\_appraisal\\_addendum\\_2019](https://www.rossendale.gov.uk/downloads/download/11171/sustainability_appraisal_addendum_2019) [Date Accessed: 06/12/21]

<sup>17</sup> Lepus Consulting (2021) Rossendale Local Plan 2019-2036 Schedule of Proposed Main Modifications to the Rossendale Local Plan (September 2021) Sustainability Appraisal of the Main Modifications. Available at: [https://www.rossendale.gov.uk/downloads/file/16815/el12003\\_-\\_sustainability\\_appraisal\\_of\\_the\\_proposed\\_main\\_modifications](https://www.rossendale.gov.uk/downloads/file/16815/el12003_-_sustainability_appraisal_of_the_proposed_main_modifications) [Date Accessed: 06/12/21]

**Table 2.1:** Timeline of sustainability appraisal reports in conjunction with RBC Local Plan preparation

Date	Local Plan Process	SA Process
2012	N/A*	SA Scoping Report
2017	Draft Local Plan	SA of the Draft Local Plan
2018	Local Plan Pre-Submission Version	SA of the Publication Local Plan
2019	Local Plan Submission Version	SA Addendum to the Regulation 19 SA Report
2020	Examination in Public	Attendance at the hearings
2021	Proposed Main Modifications	SA of the Proposed Main Modifications

\*The Scoping Report was prepared as part of the Site Allocations and Development Management Policies DPD stage. Due to changes in the planning system, the council then moved to preparation of the RLP.

## 2.4 SA Framework

2.4.1 The SA process used an SA Framework to appraise the plan as it evolved. The purpose of the SA Framework is to provide a way of ensuring that the Local Plan preparation process considers the environmental, social and economic impacts of the proposed site allocations and policies on the various environmental, social and economic receptors located in and around the borough. The Framework offers a consistent and robust means of description, analysis and comparison for these impacts.

2.4.2 The SA Framework consists of 13 sustainability objectives. The extent to which these objectives will be achieved can, in most cases, be measured using a range of indicators. The SA Objectives were largely informed by topics of Annex I (f) of the SEA directive<sup>18</sup>, taking into account other relevant national, regional and local plans and programmes and local key issues. By taking into account each of these influences, the SA Framework allows for a robust, thorough and meaningful Sustainability Appraisal.

2.4.3 The SA Objectives included within the SA Framework are set out in **Table 2.2**.

**Table 2.2:** SA Framework objectives

SA Objective	Description	SEA Topic(s)
1 Landscape	Protect and enhance high quality landscapes and townscapes in the borough, especially those that contribute to local distinctiveness.	Biodiversity, fauna, flora, soil and landscape
2 Cultural heritage	Protect, enhance and manage sites, features and areas of archaeological, historical and cultural heritage importance.	Cultural heritage including architectural and archaeological heritage
3 Biodiversity and geodiversity	Protect, enhance and manage biodiversity and geodiversity.	Biodiversity, fauna, flora and soil

<sup>18</sup> Biodiversity flora and fauna; Population; Human health; Soil; Water; Air; Climatic factors; Material assets; Cultural heritage (including architectural and archaeological heritage); and Landscape.

SA Objective		Description	SEA Topic(s)
4	Water and flooding	Protect, enhance and manage biodiversity and geodiversity in Rossendale	Water
5	Natural resources	To ensure the efficient use of natural resources in Rossendale.	Biodiversity, flora, fauna & soil
6	Climate change mitigation	To minimise the requirement for energy use, promote efficient energy use and increase the use of energy from renewable sources.	Climate change, material assets
7	Climate change adaptation	To promote adaptation to Rossendale's changing climate.	Climate change
8	Human health	To improve physical and mental health and well-being of people and reduce health inequalities in Rossendale.	Population & human health
9	Material assets	To ensure sustainable management of waste, minimise its production and increase re-use, recycling and recovery rates	Air, water & soil
10	Housing	Provide a range of affordable, environmentally sound and good quality housing which meets the needs of the community of Rossendale.	Population, human health and material assets
11	Employment: location	To support a strong, diverse, vibrant and sustainable local economy to foster balanced economic growth.	Population & material assets
12	Employment: skills	To improve education, skills and qualifications in the borough and provide opportunities for lifelong learning.	Population & material assets
13	Transport	To improve the choice and use of sustainable transport in Rossendale and reduce the need to travel.	Population, human health, air & climate change

2.4.4 The likely adverse and positive sustainability effects of the RLP as identified as part of the Regulation 19 SA Report and addendum are presented in **Chapter 3** (see **Tables 3.1** and **3.2**).

2.4.5 Assumptions for each of the SA Objectives were developed and supported by the SA methodology which is presented in the R19 SA Report (Pre-Submission Version, 2018).



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## 2.5 Habitats Regulations Assessment

- 2.5.1 The RLP was also subject to a Habitats Regulations Assessment (HRA) in accordance with the Conservation of Habitats and Species Regulations 2017 as amended<sup>19</sup> (the Habitats Regulations).
- 2.5.2 Following a screening exercise (Stage 1 of the HRA process) an Appropriate Assessment<sup>20</sup> (Stage 2 of the HRA process) was undertaken to assess Likely Significant Effects (LSEs) in more detail. LSEs associated with recreation could not objectively be ruled out at the following European Sites:
- South Pennine Moors SAC; and
  - South Pennine Moors Phase 2 SPA.
- 2.5.3 The HRA concluded that, based on the council's continued adoption and progress of the relevant monitoring and mitigation strategies, all potential LSEs on European sites caused by the RLP alone or in-combination could be objectively ruled out.
- 2.5.4 In 2021, the Main Modifications were assessed in the HRA process<sup>21</sup>. This assessment concluded that there would be no adverse impact on the site integrity of any European site as a result of the Main Modifications.

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<sup>19</sup> The Conservation of Habitats and Species Regulations (2017) SI No. 2017/1012, TSO (The Stationery Office), London.

<sup>20</sup> Lepus Consulting (2016) Habitat Regulations Assessment of the Rossendale Local Plan, Screening Report, September 2016. Available online at: [https://www.rossendale.gov.uk/downloads/download/10831/sustainability\\_appraisal\\_and\\_habitats\\_regulation\\_assessment\\_of\\_the\\_local\\_plan](https://www.rossendale.gov.uk/downloads/download/10831/sustainability_appraisal_and_habitats_regulation_assessment_of_the_local_plan) [Date Accessed: 06/12/21]

<sup>21</sup> Lepus Consulting (2021) HRA of the Proposed Main Modification Assessment. Available at: [https://www.rossendale.gov.uk/downloads/file/16808/ej2004\\_-\\_habitat\\_regulations\\_assessment\\_of\\_the\\_proposed\\_main\\_modifications](https://www.rossendale.gov.uk/downloads/file/16808/ej2004_-_habitat_regulations_assessment_of_the_proposed_main_modifications) [Date Accessed: 06/12/21]

## 3 Why the adopted Local Plan was chosen, in light of reasonable alternatives

### 3.1 Reasonable alternatives

3.1.1 At each stage of the plan making process, different reasonable alternatives were identified, described and evaluated through the SA process.

3.1.2 The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. Reasonable alternatives (RAs) are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.

3.1.3 The following types of RA were assessed in the SA process for the RLP:

- Combined housing and employment quanta (housing and employment floorspace number);
- Distributional options (Broad spatial options, district-wide); and
- Development allocations.

3.1.4 The development allocations were evaluated in the 2017 SA Report whilst the strategic spatial options were evaluated in Appendix D of the 2018 SA Report. It should be noted that whilst the council had identified strategic spatial options, the Inspectors and the SA team both agreed that it would be better next time if the RAs to inform spatial strategy could be identified in stages. By presenting the four options in a compound form, the options could not easily be nuanced or more heavily modified in plan making terms. The options had 'locked' in the housing number with a particular distribution whereas it would have been better to have firstly identified the housing number (having tested several options in the SA process) and subsequently identify and appraise spatial variations for the delivery of the agreed number.

### 3.2 SA of the strategic spatial options

3.2.1 To help inform the direction of the plan making, a series of spatial options (A-D) were prepared for the Rossendale Local Plan (RLP) by the council. These were prepared on the basis that they provided options around which plan making could be informed as the plan evolved. They are high level and the SA findings are similar for each option, despite the difference in housing numbers. Section 2.4.5 of the SA (2018) concludes that "*Overall, Option D was considered to be the best performing option*".

3.2.2 Subsequently, the council prepared a modified version to Option D which was tested in the R19 SA Report. The spatial strategy was further modified later in the Main Modifications process.

**Table 3.1: Spatial Options and Quanta reasonable alternatives assessed in this report**

	Spatial Option A	Spatial Option B	Spatial Option C	Spatial Option D
Quanta	3,000 dwellings 10ha employment	7,000 dwellings 24ha employment	2,000 dwellings 6ha employment	5,000 dwellings 9ha employment
Distribution	<ul style="list-style-type: none"> <li>- 58ha on urban boundaries</li> <li>- 23ha Rawtenstall</li> <li>- 23ha Bacup</li> <li>- 9.5ha Whitworth</li> <li>- 5ha Green Belt sites</li> <li>- &lt; 20% brownfield sites</li> </ul>	<ul style="list-style-type: none"> <li>- Significant development at Edenfield</li> <li>- 25ha of greenfield sites in villages</li> <li>- 11ha Green Belt sites</li> <li>- &lt; 10% brownfield sites</li> </ul>	<ul style="list-style-type: none"> <li>- Focus on urban areas</li> <li>- Increase density to 40-45dph</li> <li>- Maximise reuse of vacant mills</li> <li>- More development in deprived locations</li> <li>- Development linked to existing services</li> <li>- 35% brownfield sites</li> </ul>	<ul style="list-style-type: none"> <li>- Mix of development across the borough</li> <li>- Increase density to 40-45 dph</li> <li>- 14ha Bacup</li> <li>- 10 ha Rawtenstall</li> <li>- &lt; 20% brownfield sites</li> </ul>
Benefits	<ul style="list-style-type: none"> <li>- Reduces urban sprawl by focusing development near urban boundaries</li> <li>- Opportunities for brownfield development</li> </ul>	<ul style="list-style-type: none"> <li>- More than double the housing need</li> <li>- No issues with housing deliverability</li> <li>- Maximises growth opportunities</li> </ul>	<ul style="list-style-type: none"> <li>- Focus on brownfield development</li> <li>- Better related and maximises the use of current services</li> <li>- Limited disturbance to landscape</li> </ul>	<ul style="list-style-type: none"> <li>- Exceeds the housing need</li> <li>- Combines strategies</li> <li>- Optimal use of brownfield land</li> <li>- Retains key existing employment sites</li> </ul>
Potential issues and Risks	<ul style="list-style-type: none"> <li>- Just short of the housing need</li> <li>- Short of employment land need</li> <li>- Release of Green Belt</li> <li>- Limited availability at Haslingden</li> <li>- Road capacity issues</li> <li>- Landscape impacts</li> </ul>	<ul style="list-style-type: none"> <li>- Large release of Green Belt</li> <li>- Development related to opportunity - not need or services</li> <li>- Strong environmental and landscape impacts</li> <li>- Road capacity issues</li> </ul>	<ul style="list-style-type: none"> <li>- Falls short of housing and employment land need</li> <li>- Loss of employment sites for housing</li> <li>- Loss of open space in urban areas</li> </ul>	<ul style="list-style-type: none"> <li>- Short of employment land need</li> <li>- Limited availability at Haslingden</li> <li>- Flood risk</li> <li>- Road capacity issues</li> </ul>

### 3.3 SA of the Development Sites

3.3.1 The R18 SA Report (2017) assessed 228 RA sites. The council then used the SA information alongside other evidence streams to short list approximately 80 sites in the R19 version of the Local Plan. Generally, SA objectives for socio-economic factors performed well whilst environmental SA objectives performed on a mixed basis of positive and negative effects.

3.3.2 The SA information in the R19 report focused on those sites that had been selected from the R18 SA report by the council. A range of different effects were recorded from the appraisal. All sites were evaluated pre- and post-mitigation by applying the mitigating effects of proposed local plan policies, in order to identify residual effects. The outcome of this process is discussed further in **Chapter 4**.

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### 3.4 SA of Main Modifications (September 2020)

3.4.1 Following the Local Plan hearing sessions, the Inspector identified a number of Main Modifications to rectify issues of legal compliance and/or soundness with the Local Plan. RBC proposed a total of 58 Main Modifications to the RLP. Of these, the following matters were screened as requiring appraisal through the SA process<sup>22</sup>.

- The Local Plan Vision and Objectives;
- Policy SD4: Green Belt Compensatory Measures;
- Policy SS: Spatial Strategy;
- 32 site-specific housing policies; and
- Seven site-specific employment policies.

3.4.2 Overall, the Main Modifications of the Rossendale Local Plan would be expected to improve the sustainability performance of the Local Plan. The new and amended policies assessed within the SA of Main Modifications report would be likely to result in positive impacts, or no significant change, with regard to sustainability. The modifications would not be expected to alter the residual effects identified in the Regulation 19 SA report.

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<sup>22</sup> Lepus Consulting (2021) Rossendale Local Plan 2019-2036 Schedule of Proposed Main Modifications to the Rossendale Local Plan (September 2021) Sustainability Appraisal of the Main Modifications. Available at: [https://www.rossendale.gov.uk/downloads/file/16815/e112003\\_-\\_sustainability\\_appraisal\\_of\\_the\\_proposed\\_main\\_modifications](https://www.rossendale.gov.uk/downloads/file/16815/e112003_-_sustainability_appraisal_of_the_proposed_main_modifications) [Date Accessed: 06/12/21]

# 4 How the Environmental Report has been taken into account

## 4.1 SA Recommendations

4.1.1 The SA of the RLP, in particular the R19 Pre-Submission SA Report, identified residual positive and negative effects associated with several SEA topics. This chapter discusses the significance of the residual effects and reviews the extent to which the RLP has responded to the findings, if at all.

4.1.2 **Table 4.1** documents all adverse residual effects and discusses the policy response to each effect. There is not always a policy response.

4.1.3 **Table 4.2** documents all positive residual effects.

*Table 4.1: Adverse effects of the Local Plan recorded in the Regulation 19 SA report<sup>23</sup>*

SEA Topic	Residual impacts	Short, medium or long term, temporary or permanent?	Changes through Main Modifications
Biodiversity, flora and fauna	<ul style="list-style-type: none"> <li>A net loss in vegetation cover over the Plan period (Paragraph 107 of the NPPF includes ‘minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures’ as a component of ‘pursuing sustainable development’).</li> <li>Minor adverse impacts on priority habitats throughout the Plan area.</li> <li>Increased fragmentation of defined ecological networks for heathland, woodland and grassland in Rossendale and Lancashire.</li> </ul>	These effects will be likely to be long term and potentially permanent, with limited scope for mitigation.	<p>The Local Plan Vision draws attention to the fact that natural assets will continue to be protected and enhanced for their intrinsic value to biodiversity and tackling climate change as well as their recreational and economic value to local people and visitors alike.</p> <p>The Strategic Priorities of the Plan include enhancing the borough’s biodiversity including through the use of the Scout Moor Habitat Enhancement Fund to deliver upland restoration projects.</p> <p>New Policy SD4 on Green Belt Compensatory Measures includes a commitment to biodiversity improvements: ‘Types of improvements that would be considered acceptable include the creation or enhancement of green or blue infrastructure; biodiversity gains (additional to those required</p>

<sup>23</sup> Lepus Consulting (2018) Sustainability Appraisal and Strategic Environmental Assessment of the Rossendale Borough Council Local Plan: Regulation 19 SA Report August 2018. Available at:

[https://www.rossendale.gov.uk/downloads/download/11170/sustainability\\_appraisal\\_of\\_the\\_rossendale\\_draft\\_local\\_plan\\_pre-submission\\_publication\\_version\\_2018](https://www.rossendale.gov.uk/downloads/download/11170/sustainability_appraisal_of_the_rossendale_draft_local_plan_pre-submission_publication_version_2018) [Date Accessed: 06/12/21]

SEA Topic	Residual impacts	Short, medium or long term, temporary or permanent?	Changes through Main Modifications
			under Policy ENVI), such as tree planting, habitat connectivity and natural capital'.
<b>Climate and water</b>	<ul style="list-style-type: none"> <li>A net increase in energy consumption and GHG emissions in the Plan area.</li> <li>A net reduction in the carbon sink capacity of vegetation in the Plan area due to a loss of vegetation.</li> </ul>	These effects will be likely to be long term and potentially permanent, with limited scope for mitigation.	<p>The Local Plan Vision makes a commitment to tackle climate change; this is backed up with R19 policies concerning Green Infrastructure and renewable energy.</p> <p>The Strategic Priorities for the Plan include reducing the impact of and adapting to climate change, including suitable flood prevention measures, including the promotion and protection of Green Infrastructure, green energy projects, and encouraging travel by modes other than the car. And Addressing the Climate Change emergency through the enhancement of Green Infrastructure, provision of electric charging points and renewable energy projects.</p>
<b>Soil</b>	<ul style="list-style-type: none"> <li>The RBC Plan allocates 84 new sites for development. The total area of these sites is approximately 229ha. Of these sites, 22 of them are brownfield and previously developed. Of the total 229ha area, the brownfield sites constitute approximately 17ha. Currently mixed sites (i.e., sites with some brownfield and some greenfield land) comprise just over 15ha of the allocated land. This means under 200ha of the land allocated for development in the RBC Plan is currently previously undeveloped.</li> <li>A net loss of stable, functioning and fertile soils in the Plan area. No policy proposed in the Plan is designed to directly help protect or enhance soil stocks in the borough. The majority of these soils fall within ALC Grade 4 and are likely more ecologically valuable than they are agriculturally.</li> </ul>	This impact will be likely to be permanent, with very limited scope for mitigation.	There is no specific policy response to this issue.
<b>Waste</b>	<ul style="list-style-type: none"> <li>A net increase in waste generation is anticipated to some extent due to the construction and occupation of thousands of new homes.</li> </ul>	This impact will be likely to be short to medium term with some scope for mitigation.	There is no specific policy response to this issue.



SEA Topic	Residual impacts	Short, medium or long term, temporary or permanent?	Changes through Main Modifications
	International and national waste reduction and recycling targets will limit this.		
<b>Health</b>	<ul style="list-style-type: none"> <li>An uncertain proportion of new residents will be likely to be situated outside the target distance of several necessary health facilities.</li> </ul>	This impact will be likely to be short to medium term with some scope for mitigation.	No specific change through Main Modifications; Modified Policy MM001 includes the requirement to maintain or enhance health services in Key Service Centres and Urban Local Service Centres.
<b>Air pollution and transport</b>	<ul style="list-style-type: none"> <li>It is considered to be likely that over the Plan period, air quality will reduce in some areas of the Plan area due to local increases in road transport movements.</li> <li>There are currently concerns over capacity issues at some junctions in the borough to handle the likely increase in transport.</li> <li>It is considered to be likely that the long-term health of residents and habitats within approximately 200m of a busy road, or other major air pollutants, will be adversely impacted by pollution (e.g., atmospheric nitrogen deposition and particulate matter).</li> </ul>	This impact will be likely to be long term with limited scope for mitigation.	No specific change through Main Modifications; Commitment to monitoring is made in Table 11 of the Main Modifications consultation document.

**Table 4.2:** Likely positive sustainability effects of the RLP (reproduced from Table 14.3, SA Report, Pre-Submission 2018)

<b>Positive impacts</b>	
1	<p><b>Fluvial flood risk</b></p> <p>The Local Plan is anticipated to direct residential development away from areas at risk of fluvial flooding, which will help ensure the Plan area and its residents are well placed to adapt to climate change associated extreme weather.</p>
2	<p><b>Employment</b></p> <p>The Local Plan is anticipated to lead to a significant increase in employment opportunities and commercial floor space in the Plan area. This will help ensure all residents have access to employment opportunities which help to enable them to live a higher quality life.</p>
3	<p><b>Housing</b></p> <p>The development proposed in the Local Plan would make a significant contribution towards meeting the various housing needs in the Plan area, including the quantity, distribution and affordability.</p>
4	<p><b>Physical and mental health</b></p> <p>The Local Plan is anticipated to help ensure that residents in the Plan area have access to a range of health facilities, including GP surgeries, hospitals and natural habitats. This will be likely to help ensure residents can pursue physically and mentally healthy lifestyles.</p>
5	<p><b>Transport</b></p> <p>The Local Plan is anticipated to help ensure that residents will have convenient access to frequent, affordable and sustainable modes of transport. Where this is currently not the case, it is likely that policies in the Local Plan will help ensure that the sustainable transport options are improved.</p>
6	<p><b>Efficient use of land</b></p> <p>The Local Plan seeks out opportunities for using previously developed and brownfield land. The efficient use of land proposed in the Local Plan will help to avoid unnecessary losses of natural resources such as soil whilst helping to avoid losses of open spaces and adverse impacts on objectives such as biodiversity.</p>

# 5 How opinions of consultation bodies and the public have been taken into account

## 5.1 Consultation responses

5.1.1 At each stage of the preparation of the RLP, an SA Report was published for consultation both with the public and statutory bodies (Natural England, Historic England and the Environment Agency). The consultation stages relating to the SA documents as well as the consultation responses received from statutory bodies relating to the SA are summarised in **Table 5.1**.

5.1.2 All consultation responses to the Local Plan and the accompanying evidence base, including comments from the statutory consultees on the Local Plan itself, can be found on the RBC website<sup>24</sup>.

*Table 5.1: SA stages and their relating consultation responses from statutory consultees*

Response from	Published SA/SEA Report	Summary of Consultation Responses	Incorporation into the SA
Scoping Stage – 2012 (to support the Site Allocations and Development Management Policies DPD prior to planning system changes)			
Natural England		Comments from Natural England sought to ensure that SA has regard to various emerging strategies and papers and national guidance, covering important topics within the Plan area including biodiversity, land resources, heritage and landscape. SA Objective 2 could be amended to refer to restoration of biodiversity and geodiversity, and that Objective 7 could include reference to the function of soils.	RBC ensured that the SA incorporated these amendments to the framework, and that the evidence base for the SA was updated in line with the suggestions.
Historic England	SA Scoping Report, March 2012	Historic England commented on various receptors within the Plan area to be considered within the Scoping report, and sought to ensure these were in line with the definitions set out in the NPPF. It was suggested that SA Objective 1 also considers setting and ensures locally important as well as statutorily designated heritage assets are assessed.	RBC agreed with the comments received and ensured these considerations were incorporated into the SA process.
Environment Agency		The Environment Agency suggested there should be an overlap between biodiversity, flora & fauna and water quality & resources topics. Strategic Flood Risk Assessment information should be considered in relation to climate change and water quality & resources, particularly regarding site allocations.	RBC subsequently amended the text of the report to reflect the links between biodiversity and water as suggested. RBC further confirmed that the Strategic Flood Risk Assessment would be an integral part of the site allocations phase.

<sup>24</sup>RBC Consultations. Available at: [https://www.rossendale.gov.uk/info/210148/local\\_plan/10629/emerging\\_local\\_plan/3](https://www.rossendale.gov.uk/info/210148/local_plan/10629/emerging_local_plan/3) [Date Accessed 03/12/21]

Response from	Published SA/SEA Report	Summary of Consultation Responses	Incorporation into the SA
Regulation 18 July – October 2017			
Natural England	SA of the draft RLP, May 2017	No comments were received from Natural England, the Environment Agency or Historic England in relation to the SA/SEA during Regulation 18 Consultation.	N/A
Historic England			
Environment Agency			
Regulation 19 August – October 2019			
Natural England	SA of the Regulation 19 Local Plan, July 2018	No comments were received from Natural England, the Environment Agency or Historic England in relation to the SA/SEA during Regulation 19 Consultation.	N/A
Historic England			
Environment Agency			
Main Modifications September – October 2021			
Natural England	SA of the RLP Appraisal of the Main Modifications	No comments were received from Natural England in relation to the SA of the RLP Appraisal of the Main Modifications.	N/A
Historic England		Historic England provided comments which disagreed with the proposed SA scores and supporting text on the following policies: <ul style="list-style-type: none"> <li>• Vision and Objectives;</li> <li>• Housing Sites; and</li> <li>• Employment Sites.</li> </ul> Historic England propose that these policies would likely have major negative impacts.	The SA is high level and although site-specific negative impacts could result, these policies are assessed as providing a positive framework which could enhance historic settings within the Plan area.
Environment Agency		No comments were received from the Environment Agency in relation to the SA of the RLP Appraisal of the Main Modifications.	N/A

## 6 How the environmental and sustainability effects of the Local Plan will be monitored

### 6.1 Monitoring

6.1.1 The SEA Regulations require that significant effects resulting from the implementation of the plan should be monitored. SEA Regulation 17 states that:

6.1.2 *“The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”.*

6.1.3 The monitoring requirements typically associated with the SA process are recognised as placing heavy demands on authorities with SA responsibilities. For this reason, the proposed monitoring framework focuses on those aspects of the environment that are likely to be negatively impacted upon, where the impact is uncertain or where particular opportunities for improvement might arise.

6.1.4 Monitoring the impacts of the Local Plan should seek to answer:

- Was the likelihood of sustainability impacts identified in the SA process accurate?
- Is the Local Plan successful in achieving its desired sustainability objectives?
- Are mitigation measures performing as expected?
- Are there any unforeseen adverse impacts of the Local Plan, and are these within acceptable limits or is remedial action required?

6.1.5 Monitoring proposals for the RLP, as presented in the Regulation 19 SA Report, are set out in **Table 6.1**.

**Table 6.1: Monitoring proposals for the Rossendale Local Plan as presented in the Regulation 19 SA**

Adverse effect	Indicator	Scale and frequency	Trigger
Heavy reliance on personal car use	Traffic flows on A roads and motorways	Annually, along key routes	Traffic flow increases year on year e.g., DfT AADT counts <sup>25</sup>
	Rates of public transport uptake	Annually, Plan-area wide	Rates of uptake declining or showing no signs of improvement
Increase in GHG emissions and energy consumption	Proportion of energy from renewable sources and carbon footprint of the borough	Annually, Plan-area wide	Year on year increases in the use of coal and oil sourced energy e.g., DBEIS statistics on local authority energy consumption <sup>26</sup>
Degradation of sensitive landscapes	Loss of key landscape features due to development	Annually, Plan-area wide	Year on year increases in quantity of development approved in sensitive LCTs
Degradation and loss of biodiversity and habitats	Quality, connectivity and species richness of habitats	Important biodiversity sites of the borough	Year on year loss of important habitats or species e.g., Condition of SSSIs <sup>27</sup> and IWSs

6.1.6 As part of the Main Modifications process the council has provided a comprehensive monitoring framework which includes the above recommendations as well as other matters that have been integrated on the basis of different policies.

<sup>25</sup> Available at: <https://www.dft.gov.uk/traffic-counts/index.php> [Date Accessed: 06/12/21]

<sup>26</sup> Available at: <https://www.gov.uk/government/statistical-data-sets/total-final-energy-consumption-at-regional-and-local-authority-level> [Date Accessed: 06/12/21]

<sup>27</sup> Available at: <https://designatedsites.naturalengland.org.uk/> [Date Accessed: 06/12/21]



Habitat Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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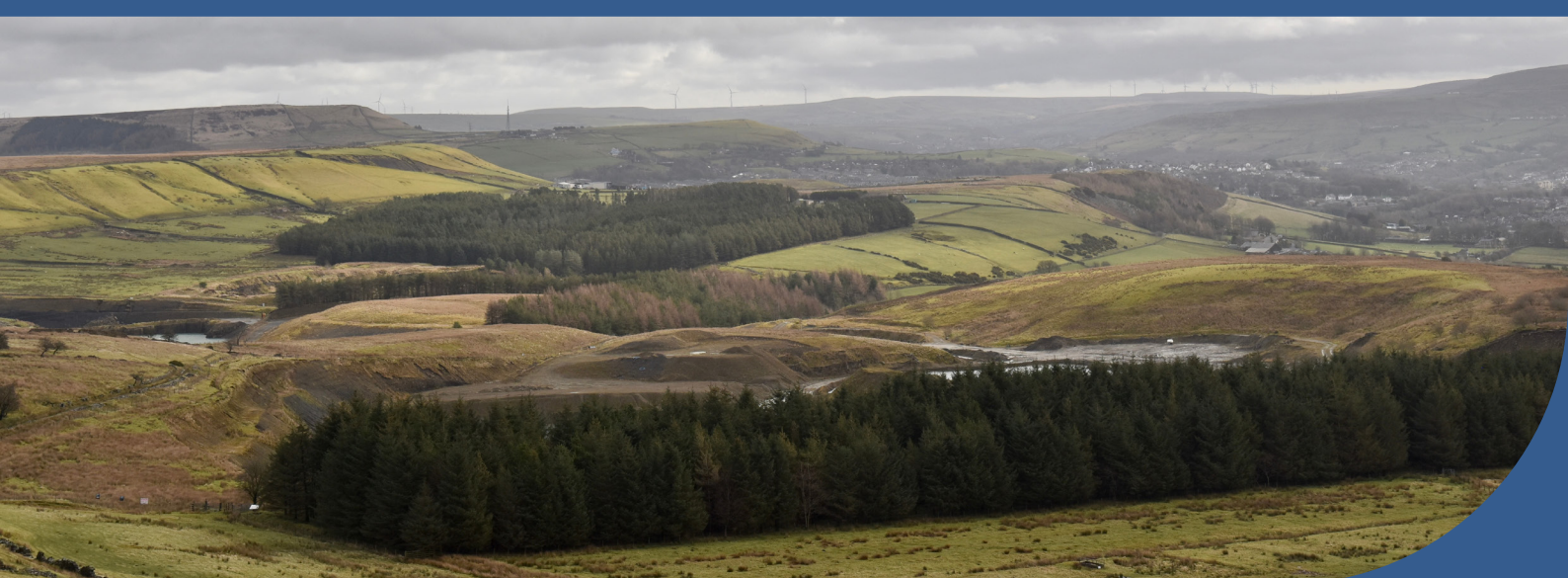
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