Rossendale BOROUGH COUNCIL

ITEM NO. E1

Subject:	Climate Change Supplementary Planning Document		**Status:**	For Publication	
Report to:	Cabinet		**Date:**	7th December 2022	
Report of:	Planning Manager		**Lead Member:**	Deputy Leader and Planning, Licensing and Enforcement	
Key Decision:	☒	Forward Plan ☒	General Exception ☐	Special Urgency ☐	
Equality Impact Assessment:		Required:	**Yes**	Attached:	**Yes**
Biodiversity Impact Assessment:		Required:	**No**	Attached:	**No**
Contact Officer:	Anne Storah / Mike Atherton		**Telephone:**	01706 252418/ 252420	
Email:	annestorah@rossendalebc.gov.uk; michaelatherton@rossendalebc.gov.uk				

1. RECOMMENDATIONS

1.1 Following consultation to approve the Climate Change Supplementary Planning Document (SPD) and for it to be used in the determination of planning applications.

1.2 Further minor amendments to be delegated to the Head of Planning and the Portfolio Holder.

2. EXECUTIVE SUMMARY

- Rossendale Borough Council declared a Climate Change Emergency in September 2019 and this is reflected in the strategic priorities set out in the Corporate Plan (2021 to 2025) and in the Council's Climate Change Strategy (2020-2023).
- The adopted Local Plan commits the Council to preparing a Supplementary Planning Document (SPD). This will provide developers with specific additional guidance on how to address issues relating to climate change in their development proposals, encouraging new buildings that have a lower carbon footprint both in construction and operation.
- The key areas that the SPD focuses on are:
  - Reducing the dominance of fossil-fuelled vehicles via encouraging sustainable and more active transport.
  - Improving energy efficiency and promoting renewables in the Borough
  - Water interventions
  - Biodiversity and Green Infrastructure
- The SPD will have weight to be a consideration in determining planning applications
- The Draft SPD was considered by the Council's Overview and Scrutiny Committee (11 July 2022) prior to a 6-week consultation which took place in July/August 2022.
- In total 22 comments were received from a number of stakeholders including statutory consultees, residents and developers. These have now been considered and have resulted in some amendments being made prior to adoption of the SPD, as discussed below.
- The Council is amongst the first in the country to develop and seek to adopt supplementary planning guidance on climate change.
- On adoption this will be one of only a few documents to have been produced by Councils that will tackle climate change through the planning system.

3. BACKGROUND

3.1 The Council acknowledges that climate change is a key issue and declared a Climate Change Emergency in 2019, and published a Climate Change Strategy in 2020. Government guidance for planning refers to climate change and the National Planning Policy Framework (NPPF) states that the planning system can support "*the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical changes in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure*[1]"

3.2 The Local Plan contains a number of policies relating to Climate Change and sets out the Council's intention to provide more detailed guidance to planning applicants and their agents in the form of a Supplementary Planning Document (SPD), which will be a material consideration in determining planning applications. However, SPDs cannot introduce new planning policies and the National Planning Practice Guidance (PPG)[2] also says that "they should not add unnecessarily to the financial burdens on development".

3.3 In line with the Council's Corporate Plan 2021-2025 the production of this SPD has been prioritised as it will meet the strategic priorities set out in the Council's Corporate Plan, and the Actions listed in the Council's Climate Change Strategy. The SPD has been produced in accordance with the Regulations with appropriate consultation and within the timescales.

3.4 This SPD on Climate Change is one of only a few to address specifically the issue of how development should adapt to and mitigate for climate change in a planning document and is only possible because Rossendale has an up-to-date Local Plan in place. The SPD will guide proposals to ensure that future developments take into account and mitigate their impacts on the climate.

3.5 A Draft version of the Climate Change Supplementary Planning Document (SPD) was taken to the Overview and Scrutiny Committee on 11 July 2022 prior to consultation. The minutes show that the Committee resolved:

1. The Overview & Scrutiny Committee reviewed the Draft Climate Change SPD and recommended it to go out for consultation for at least 6 weeks over summer 2022.
2. The Overview & Scrutiny Committee recommended that any amendments to the Draft Climate Change SPD prior to the consultation be delegated to the Head of Planning and Portfolio Holders.

3.6 The production of the SPD was overseen by a Steering Group of members (Cllrs Adshead, Lythgoe and Oakes) and officers from the Economic Development and Communities Directorates. A Draft version was taken to Overview and Scrutiny, where some additional wording was suggested, and the members agreed to extend the consultation for a further 2 weeks resulting in a 6-week public consultation.

3.7 The Climate Change SPD focuses on the following four themes:

- Reducing the dominance of fossil-fuelled vehicles via encouraging sustainable and more active transport.
- Improving energy efficiency and promoting renewables in the Borough
- Water interventions
- Biodiversity and Green Infrastructure

[1] National Planning Policy Framework - 14. Meeting the challenge of climate change, flooding and coastal change - Guidance - GOV.UK (www.gov.uk)

[2] National Planning Practice Guidance on Plan Making (Paragraph 008 Reference ID: 61-008-20190315). https://www.gov.uk/guidance/plan-making

3.8 The SPD contains a checklist at the back to help developers focus on measures that they could adopt to make their development more sustainable. Applicants of major schemes will be expected to demonstrate how these measures have been incorporated.

3.9 During the consultation respondents raised various issues, some of which have resulted in changes to the SPD being recommended; these are discussed below.

4. DETAILS

4.1 As discussed with Overview and Scrutiny Committee it was agreed that the Council would undertake a 6-week long consultation (rather than the statutory 4 weeks), between 13 July and 24 August 2022. In total 21 responses were received on the SPD from residents, statutory consultees, including Lancashire County Council (mainly from the Lead Local Flood Authority), National Highways, Sport England, United Utilities, Natural England, developers (Taylor Wimpey and Rowland Homes), other interested parties (mainly residents from a neighbouring Borough) and a town Councillor. Comments were also made by the Overview and Scrutiny Committee.

4.2 Key themes raised included:

- concerns over the number, location and efficiency of on-shore wind turbines,
- acknowledgement of the importance of moorlands to provide multi-benefits such as carbon storage, recreational use and visual amenity,
- the ability of well-designed Sustainable Drainage Systems (SuDS) to create developments that can adapt well to climate change (eg reduce flood risk) and mitigate carbon emissions (eg tree planting, green roofs and walls).
- the importance of Active Travel not only to reduce carbon emissions but to enhance health and well-being
- more use to be made of renewable energy and electric vehicle charging points in new housing and by the Council
- concerns were raised regarding requiring a percentage of renewable schemes to be provided on major development sites in terms of viability, and duplication with Building Regulations.

4.3 It should be noted that some responses made were outside the remit of this SPD.

4.4 All the responses have been published in full and are available to view on the Council's website or in paper format at the Council's offices. A consultation statement has also been prepared which summarises the responses received and explains if and how amendments have been made.

4.5 In general the SPD has been well received, though some developers have queried some of the more prescriptive requirements, such as ensuring 10% on site renewable on all schemes above 10 dwellings and requiring the minimum of equivalent Code for Sustainable Homes level 4 / 19% improvement on dwelling emission rate over the target emission, arguing that they go beyond the adopted Local Plan. This has been retained in the SPD. Many, including Natural England, want greater reference to peat and its value – these changes have been made, more reference has been made to active travel, as a result of comments, including those made by Sport England. Several respondents have recorded their continuing opposition to wind turbines and in particular the adopted Local Plan policy ENV7, referring to comments made during the Local Plan examination.

4.6 The key changes made to the document as a result of the comments received include:

- additional reference to active travel and key documents such as Gear Change, Uniting the Movement and Active Design Guide (p7)
- strengthening wording around improving links from new developments to cycleways (p9)

- insert wording about public transport (p11)
- more references added about the LLFA and its planning advice service, the 4 pillars of SuDS and inserting the SuDS proforma as an appendix (p18, 19, 21, 22 and Appendix D).
- adding the role of peat in storing carbon, supporting rare wildlife and water regulation (p24)
- more examples of how biodiversity and green infrastructure can be improved (p28)
- a new section added for monitoring (chapter 7), linking with indicators already set in the adopted Local Plan and monitored annually through the Authority Monitoring Report.

4.7 The document links to projects being undertaken not just by Rossendale but by partners, such as Lancashire County Council, eg cycleways, sustainable drainage systems. It also highlights good practice elsewhere.

4.8 It should be noted that there is likely to be some overlap with the other SPDs that are intended to be produced, for example, the Design Guide, Ecological networks and biodiversity. In addition, further guidance may be issued by other organisations that may have a bearing on this document which could require further changes, for example, through the enactment of the Levelling Up Bill, or further changes to the National Planning Policy Framework (NPPF).

5. RISK

5.1 This document is intended to help developers take on board issues relating to climate change and the need to prepare for net zero carbon emissions, a key Government objective. Although the Local Plan contains policies relating to climate change issues, this SPD provides additional detail and guidance. Not having the SPD in place may result in developments not addressing climate change issues as effectively as they could and exacerbating the current situation.

5.2 The SPD is open to challenge in the period immediately post adoption by the Council, particularly by parties who consider their comments have not been considered or taken aboard. Planning decisions that are made using this policy as a reason for refusal can be appealed and so this SPD could be scrutinised by Planning Inspectors. Nevertheless the risk associated is minimal and outweighed by the need to issue further guidance to address the Climate Emergency.

6. FINANCE

6.1 The Council could be subject to appeal costs and barrister fees defending planning refusal decisions. However, the SPD is based on policies set out in the adopted Local Plan and so the additional risk is considered minimal

7. LEGAL

7.1 In preparing this SPD for adoption by the Council, the Forward Planning team must comply with the legislation set out in Town and Country Planning (Local Planning) (England) Regulations 2012, including consultation requirements. An adoption statement must accompany the adopted SPD, specifying the date of adoption and that ‘any person with sufficient interest in the decision to adopt the SPD may apply to the High Court for permission to apply for a judicial review, within 3 months of adoption’.

8. POLICY AND EQUALITIES IMPLICATIONS

8.1 There are no specific policy or equalities implications, as this is a guidance document based upon the recently adopted Local Plan. An Equality Impact Assessment has been undertaken and accompanies the Report.

9. REASON FOR DECISION

9.1 Adopting the Climate Change SPD will enable the Council to ensure development that requires planning permission will take climate change issues into account, addressing the Climate Change emergency that the Council declared in 2019, and meet the strategic priorities set out in the Council's Corporate Plan 2021-2025.

Background Papers	
Document	**Place of Inspection**
Climate Change SPD (November 2022)	Attached
Council Change SPD – Consultation version (July 2022)	Climate Change SPD | Rossendale Borough Council
Schedule of Consultation Responses	Climate Change SPD - Combined Responses | Rossendale Borough Council
Consultation Statement	Attached
Draft Adoption Statement	Attached
Equality Impact Assessment	Attached

Climate Change

Supplementary Planning Document

November 2022

Rossendale
BOROUGH COUNCIL

Contents

1. Introduction 3
2. Planning Status and links to the Local Plan 4
3. Reducing the dominance of fossil-fuelled vehicles via encouraging sustainable and more active transport 8
4. Improving energy efficiency and promoting renewables in the Borough 14
5. Water interventions 21
6. Biodiversity and Green Infrastructure 27
7. Monitoring 34
Appendix A: Cycle Routes within Rossendale 35
Appendix B: Glossary 36
Appendix C - Checklist for Climate Change Statement 38

1. Introduction

1.1 Climate change is a significant issue that requires urgent action. The global climate crisis will lead to more frequent and extreme weather events, including flooding, wildfires, extreme heat, and droughts. As such, it is important that new developments are designed and built to mitigate greenhouse gas emissions, be adaptable for the impacts of climate change, and support communities.

1.2 The Government has introduced changes to the Building Regulations, which set standards for the design, construction and alteration of buildings, as of June 2022, to help deliver net zero, with new homes built after June 2023 to produce 30% less CO_2. This is in readiness ahead of the Future Homes and Buildings Standard expected in 2025. Rossendale Borough Council declared a Climate Change Emergency in September 2019 and published a Climate Change Strategy in 2020[1]. The Council is committed to:

- Reaching a carbon-zero position for the Council's activities by 2030;
- Reducing the Council's overall energy consumption by 50 percent by 2030;
- Obtaining our energy needs from renewable sources;
- Increasing the number of businesses and households who source their utilities from renewable sources

1.3 The Local Plan was adopted in December 2021 and recognises the need to address the climate change emergency. Planning and Building Control have an important role in ensuring buildings minimise carbon emissions and adapt to increasing temperatures. Other types of development can also help, for example, renewable energy projects.

1.4 The Local Plan commits the Council to preparing a number of additional guides known as Supplementary Planning Documents (SPDs) to support the Local Plan policies. This SPD on Climate Change is the first of these to be published and it should be noted that the other SPDs will relate to climate change matters for example the Design Guide SPD, and the Ecological Networks SPD.

1.5 This document discusses actions relating to the following four principles:

- Reducing the dominance of fossil-fuelled vehicles via encouraging sustainable and more active transport
- Improving energy efficiency and promoting renewables in the Borough
- Water interventions

[1] Rossendale Borough Council. (2020). https://www.rossendale.gov.uk/downloads/file/16648/rossendale_council_climate_change_strategy

- Biodiversity and Green Infrastructure

2. Planning Status and links to the Local Plan

2.1 This Supplementary Planning Document is a material consideration in the determination of planning applications in Rossendale. The adopted Local Plan makes several references to Climate Change and the need to prepare a Supplementary Planning Document (SPD). It is expected that this SPD will be a live document, to be updated and expanded as appropriate. It is expected that further Government guidance will be issued and this may result in changes to this SPD. For example, the new Building Regulations may necessitate changes to this guidance. The Local Plan and the supporting SPDs should be read as a whole.

The National Planning Policy Framework

2.2 This provides guidance from Government on the preparation of Local Planning policies and the determination of planning applications. Most recently amended in 2021 (with further changes anticipated soon), this explains the role of the planning system in responding to the climate emergency by supporting:

> *the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical changes in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure*[2].

2.3 This high level Government aspiration has been translated into the Local Plan and into this SPD.

The Local Plan Vision (para 11)

2.4 Rossendale's distinctive landscapes and 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 (p7)

Local Plan Objectives: Environment theme (para 12 p8)

- *Reducing the carbon footprint through suitable design and ensuring sustainable development in appropriate locations*

[2] https://www.gov.uk/guidance/national-planning-policy-framework/14-meeting-the-challenge-of-climate-change-flooding-and-coastal-change

- *Reducing the impact of and adapting to climate change, including suitable flood prevention measures, the promotion and protection of Green Infrastructure, green energy projects, and encouraging travel by modes other than the car*
- *Protecting and enhancing natural assets, and improving biodiversity*

Strategic Priorities (para 13):

2.5 Addressing the Climate Change emergency through the enhancement of Green Infrastructure, provision of electric charging points and renewable energy projects

ENV1: High Quality Development in the Borough

2.6 All proposals for new development in the Borough will be expected to take account of the character and appearance of the local area, including, as appropriate…… (q) Designs that will be adaptable to climate change, incorporate energy efficiency principles and adopting principles of sustainable construction including Sustainable Drainage Systems (SuDS);

2.7 Design briefs or design codes will be required for major development and other sites as appropriate to help deliver high quality proposals. The Council will work with developers to address the nature and scope of these documents. The Council will prepare a Design Guide SPD to provide specific advice to developers. An SPD addressing climate change will also be produced. (para 234)

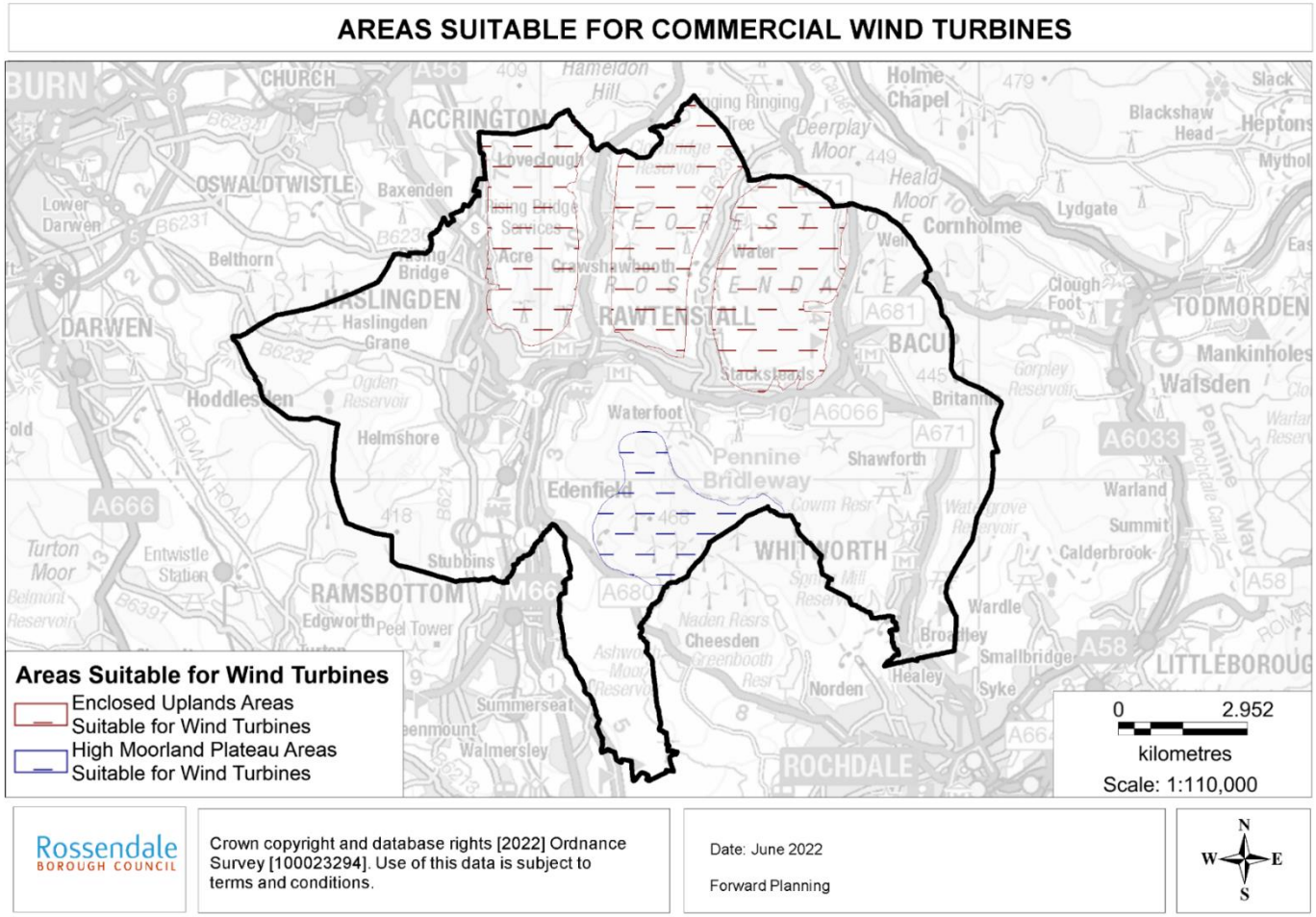
ENV7: Wind Turbines

2.8 The policy explains their importance for the reduction of greenhouse gases and thus to slow down climate change. The Local Plan Policies Map identifies areas of search for wind turbines, where wind turbines may potentially be suitable depending on the height of the turbine, compliance with Policy ENV7, and where any planning impacts identified by the affected community have been addressed.

- *All areas of the Borough* are potentially suitable for single turbines of up to 25m.
- *Enclosed uplands areas suitable for wind turbines* – potentially for single and small groups of turbines, up to 59m in height
- *High moorland plateau areas suitable for wind turbines* – for new larger turbines or re-powering of existing, so long as areas of deep peat and blanket bog are avoided.

- In addition the installation, alteration and replacement of a smaller standalone wind turbine may sometimes be considered as permitted development. Please refer to the planning portal[3] for details of this.

2.9 Illustration of these areas are shown below:



[3] https://www.planningportal.co.uk/permission/common-projects/wind-turbines/planning-permission-stand-alone-wind-turbines

Policy ENV9: Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality

2.10 The proposed drainage measures should fully integrate with the design of the development and priority should be given to multi-functional sustainable drainage systems SuDS (as opposed to underground tanked storage systems), which contribute to amenity, biodiversity and water quality, as well as overall climate change mitigation.

2.11 This explains that the impacts of climate change and more intense rainfall events also need to be taken into account when considering new development. High surface water runoff also contributes to temporary poor water quality.

2.12 More detail on natural methods to manage surface water run-off will be encouraged as a priority. The use of permeable surfaces/areas of soft landscaping, the use of green infrastructure, and the use of natural flood management measures in upland areas will all be supported where appropriate, working together with relevant partners. More detail on this will be contained in the forthcoming Climate Change SPD.

2.13 SuDS can include a variety of natural surface water management and could include innovative approaches such as green roofs, grey water management and bio-retention tree pits. Further guidance on this will be contained in a future Climate Change SPD.

Policy ENV10: Trees and Hedgerows

2.14 Trees and hedges also have an important role in management of climate change including urban cooling effects.

Policy TR4: Parking

2.15 Incorporating charging points for electric vehicles in new parking areas can encourage the uptake of electric vehicles and help achieve a number of associated environmental benefits, including reduced contributions to climate change and improvements to air quality (para 316).

3. Reducing the dominance of fossil-fuelled vehicles via encouraging sustainable and more active transport.

3.1 It is vital for not only climate change, but also people's health, that we promote more sustainable transport modes. Transport in Rossendale accounts for 35% of the total carbon dioxide emissions in the Borough[4]. This is down by 10% since 2005[5]; however, this will need to accelerate if net zero targets are possible in both Rossendale and the wider U.K. contexts.

3.2 Within Rossendale, the rural nature of the Borough will likely lead to more people having to use a vehicle to get around. However, 60% of all journeys by car are between 1-2 miles in length[6] and there is, therefore, potential to reduce our emissions by incorporating sustainable transport options and making them more appealing to residents. Cycling rates are low in Rossendale, with 10% of the population cycling once per month and only 2% three times per week[7], so it is important that cycling is encouraged if the Council is to meet its net-zero target by 2030. Given the Net-Zero target and the fact that UK transport emissions have not decreased since the 1990s, developments must encourage greener and more active transport alternatives. Active travel is championed by the Government agency 'Active Travel England' which objective is "for 50% of trips in England's towns and cities to be walked, wheeled or cycled by 2030". Linked to this is the policy paper 'Gear Change – A bold vision for cycling and walking'[8] which sets out the Government's vision to deliver actions to encourage cycling and walking. As stated above active travel has health and well-being

Credit: Sustrans

[4] Atkins (2021), Lancashire Net Zero Pathways

[5] BEIS. (2020). UK local authority and regional carbon dioxide emissions national statistics: 2005-2018. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/894788/2005-18-uk-local-regional-co2-emissions.ods

[6] Lancashire County Council. (2022). Active Travel in Lancashire. https://www.lancashire.gov.uk/roads-parking-and-travel/active-travel/

[7] DfT. (2021). Walking and Cycling Statistics. https://www.gov.uk/government/collections/walking-and-cycling-statistics

[8] DfT (2020). Gear Change – A bold vision for cycling and walking. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf

benefits and this is highlighted by Sport England's 'Uniting the Movement' strategy[9]. In addition, an Active Design guide including 10 planning principles to increase active lifestyle in towns, neighbourhoods, streets and open spaces[10] has been published by Sport England.

3.3 Following adoption of the Local Plan, Rossendale has committed to improving transport through a variety of mechanisms. These include improving transport links to reduce congestion, support for a commuter service on the East Lancashire Railway, and developing a strategic cycle network, which will aid in reducing harmful pollutants from fossil fuel burning as well as reducing the Borough's carbon footprint.

Link to Local Plan

3.4 Chapter 6: Transport, Strategic Policy TR1: Strategic Transport

- Support for opportunities that enhance the borough's external and internal connectivity.
- Encouragement for the reduction of travel.
- Work with partners both inside and outside the borough.

Guidance on how to apply this policy

3.5 In order to achieve this reduction of road traffic, it will be vital to provide a mixture of walking and cycling options, whilst also providing developments where local amenities are accessible. This will include a variety of local services that support not just residential, but also community and leisure facilities and create a strong community environment. Encouraging 'liveable neighbourhoods' (see Figure 1), where services are close and the need to use the car is reduced, will bring a variety of benefits, including cleaner air, healthier communities, and better resilience to climate change[11].

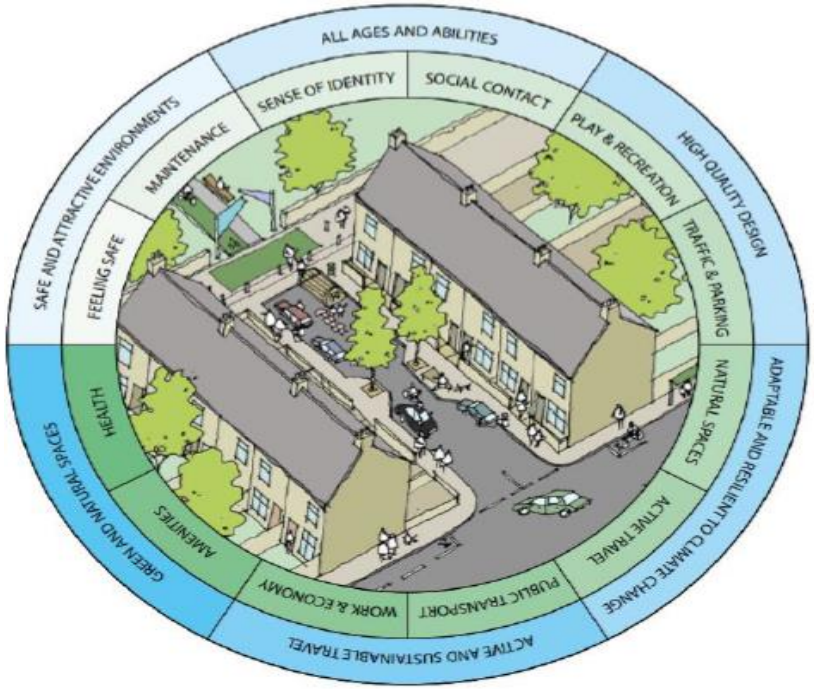


Figure 1: TCPA (2021), 20-minute neighbourhood

[9] Sport England (2021). Uniting the Movement. https://www.sportengland.org/about-us/uniting-movement
[10] Sport England (2015). Active Design guidance. https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design#the10principlesofactivedesign-5656
[11] TCPA (2021). The 20-Minute Neighbourhood. https://tcpa.org.uk/resources/the-20-minute-neighbourhood/

Increasing walking and cycling within neighbourhoods

3.6 Developments should provide permeable networks that encourage walking and cycling. This will not only lead to a reduction in carbon emissions but will see healthier communities through more active travel, and reduced air pollutants. Vehicle pollutants such as Nitrogen Oxides (NO_x) and Particulate Matter are harmful to human health at low exposure[12] and contribute to a proportion of mortalities locally. In Rossendale, this proportion is 4% (and is above the Lancashire average of 3.9)[13], so it is vital to reduce these emissions to improve the health of the community.

Credit: Lancashire Telegraph

3.7 To achieve this reduction, we will need developments that encourage movement; the National Design Guide[14] cites this as one of their ten characteristics for a well-designed place. It will be necessary to make Rossendale a place where cycle routes are easily accessible, safe to use, attractive and well maintained, as per Lancashire County Council (LCC)'s Local Cycling and Walking Infrastructure Plans (LCWIP) and central government's Cycling and Walking Investment Strategy[15]. Rossendale is part of LCC's Plan, which will identify cycling and walking infrastructure improvement for future investment, and will ensure that consideration is given to both cycling and walking within both local planning and transport policies.[16]

3.8 It will be important that cycleways and walkways integrate with the pre-existing local routes, rather than the traditional cul-de-sacs and winding roads (see Figure 2). Improving the links from new developments to existing and proposed cycleways must be considered by developers to encourage more cycling. This will result in areas that would naturally calm traffic and create more visibility for residents. The latter is particularly important, given that 24% of people do not cycle due to road safety concerns and a further 16%

[12] WHO. (2021). Ambient (outdoor) air pollution. https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health

[13] Lancashire County Council. (2022). Monitoring of air quality and health impacts - Air quality monitoring in Lancashire. https://www.lancashire.gov.uk/lancashire-insight/environment/monitoring-of-air-quality-and-health-impacts/.

[14] Department for Levelling Up, Housing and Communities. (2021). National design guide - GOV.UK (www.gov.uk)

[15] DfT. (2017). Cycling and Walking Investment Strategy. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918442/cycling-walking-investment-strategy.pdf

[16] LCC. (2022). Local Cycling and Walking Infrastructure Plans. https://www.lancashire.gov.uk/council/strategies-policies-plans/roads-parking-and-travel/cycling-and-walking-strategy/

note there is too much traffic or it is too fast[17]. Active travel needs to be an integral part of future neighbourhoods, with cycling made a more viable option. In Cambridge, the area with the highest proportion of cyclists (48% who cycle once a week[18]), it was found that convenient cycle routes are a key factor in how residents decide to travel.[19]

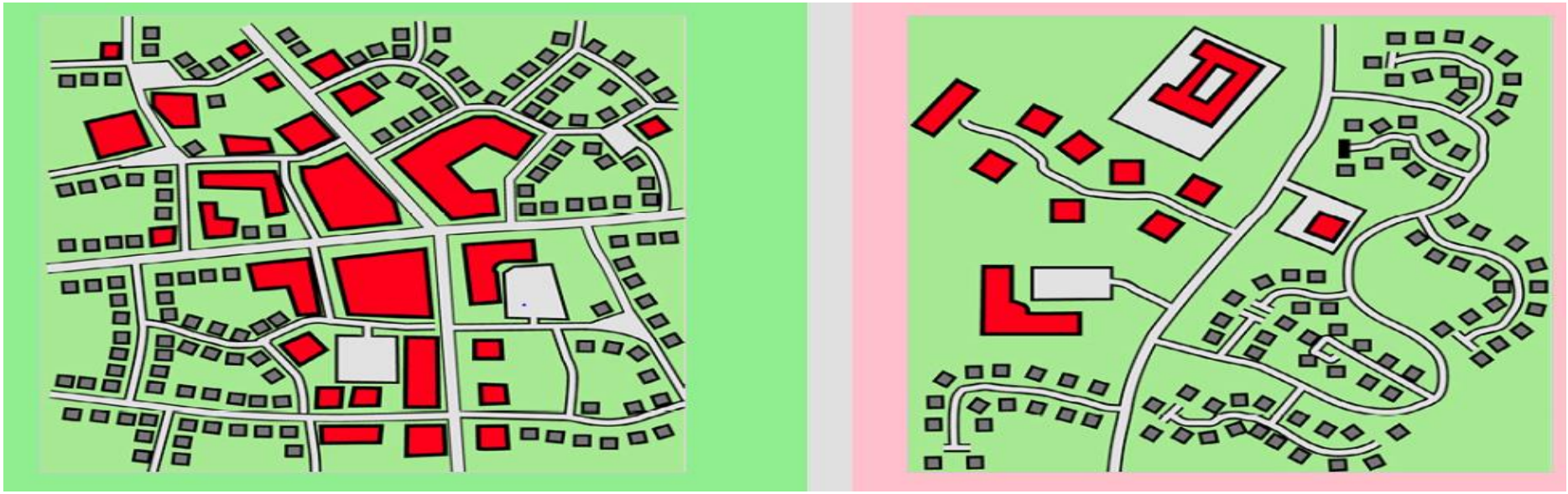


Figure 2: Interconnected streets vs. cul-de-sac (Make Space for Cycling, 2021).

3.9 Therefore, any new development in the area will need to create connections to pre-existing or future cycleways, walkways and public rights of way network in Rossendale. Appendix A shows an active travel routes within Rossendale, where any developments along this area would be required to have connections to this network. This will encourage connected neighbourhoods with better cohesion, reduce dependency on the private cars for short journeys, and allow for easier access to employment, health, retail, leisure

[17] DfT. (2020). Walking and Cycling Statistics, England: 2019. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/906698/walking-and-cycling-statistics-england-2019.pdf

[18] Sustans. (2019). Bikelife 2019 – Greater Cambridge. https://www.sustrans.org.uk/media/5949/bikelife19_greater-cambridge_web.pdf

[19] Panter, J., Griffin, S., Jones, A. … Ogilvie, D. (2011). Correlates of time spent walking and cycling to and from work: baseline results from the commuting and health in Cambridge study. *Int J Behav Nutr Phys Act* **8,** 124. https://doi.org/10.1186/1479-5868-8-124.

and education. By encouraging more cycling within communities, these interconnected roads will help the Council to cut carbon emissions by incorporating the following features:

- Low Traffic Neighbourhoods where temporary or permanent barriers – called 'modal filters' - reduce traffic (Figure 3). This will make residential streets more pleasant, inclusive and safer for active transport. We would expect design to take into the Government's Cycle Infrastructure Design guidance (LTN 1/20), which requires a coherent, direct, safe, comfortable and attractive option for cyclists. As per the Government's advice, there must also be consideration given to the inclusion of cycle parking, particularly in areas where residents cannot store their bikes at home. This parking should consider the deterrence of cycle theft – particularly for e-bikes – so it will be required to provide safe, secure and convenient parking in all developments. LTN 1/20 also specifies that cycles should be treated as vehicles and separated from pedestrians wherever possible. The provision of segregated routes for cycling within new developments especially of a significant size should be a priority.

Figure 3: Low traffic interventions (Sustrans, 2021)

Electric Vehicle Charging

3.10 In alignment with the Local Plan (policy TR4) – alongside the U.K. ambition to ban the sale of new petrol and diesel cars by 2030[20] - new developments must consider Electric Vehicle (EV) charging points in order to facilitate this transition.

3.11 As per the policy, the council will expect the following as a minimum:

- One charger per every five apartment dwellings (minimum 7kW with universal charger[21]);
- One charger per every individual new house (minimum 7kW with universal charger);
- This applies to any dwelling created, including changes of use, sub-divisions of existing dwellings

[20] DfT. (2021). Outcome and response to ending the sale of new petrol, diesel and hybrid cars and vans. https://www.gov.uk/government/consultations/consulting-on-ending-the-sale-of-new-petrol-diesel-and-hybrid-cars-and-vans/.

[21] HM Government. (2019). Electric Vehicle Charging in Residential and Non-Residential Buildings. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/818810/electric-vehicle-charging-in-residential-and-non-residential-buildings.pdf

- One charger per every ten parking spaces in non-residential car parks, such as supermarkets, shopping centres or public car parks. These should be rapid chargers (43kW or greater), so to help users fit charging into their daily routines as well as aiding with charger anxiety.

3.12 Public transport

The Local Plan supports the use of sustainable transport solutions including public transport. When recommended by Lancashire County Council, planning contributions will be sought to improve bus services such as improving bus shelters.

4. Improving energy efficiency and promoting renewables in the Borough

4.1 In 2019, Rossendale's domestic properties emitted 119ktCO_2, which is 34% of the Borough's total emissions. This compares to the U.K. average of 27% for this sector[22], so we need to improve energy efficiency and lower dependency on fossil fuels just to bring our average more in line with the rest of the U.K.

4.2 In terms of domestic properties, energy efficiency presents a significant challenge in the Borough due to the age of the properties. Around 37% of the properties were built before 1900[23] - compared to 15% nationally; these will have poorer standards than modern buildings. Age is the most significant factor associated with energy efficiency, ahead of fuel and property type. Almost all homes built since 2012 have high-energy efficiency ratings compared with 12% of assessed homes built before 1900 in England.[24] This correlates to the poor EPC ratings across the borough, with around 60% of homes being D or E rated[25] and so are more inefficient. As Figure 4 demonstrates, older homes will use more energy for heating, as opposed to modern properties where the energy requirements are more equal.

Figure 4: Energy Hierarchy (North London Waste Authority, 2022)

[22] BEIS. (2021). UK local authority and regional carbon dioxide emissions national statistics: 2005-19. UK local authority and regional carbon dioxide emissions national statistics - GOV.UK (www.gov.uk)
[23] Local Government Association (2022), Understanding Local Housing Markets. http://resi-analysts.com/wp-content/uploads/LGA/Reports/Rossendale.pdf
[24] ONS (2022), Age of the property is the biggest single factor in energy efficiency of homes. https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/ageofthepropertyisthebiggestsinglefactorinenergyefficiencyofhomes/2021-11-01
[25] Local Government Association (2022), Understanding Local Housing Markets. http://resi-analysts.com/wp-content/uploads/LGA/Reports/Rossendale.pdf

4.3 For both new and old dwellings, improvements to properties are necessary to lower our reliance on fossil-fuelled heating. For this, we advise adoption of the carbon management hierarchy displayed in Figure 5; however, retrofit may be outside of planning, but information on this is available on the planning portal.

Link to Local Plan

4.4 Policies ENV1, 7 & 8:

- Developments need to maximise energy efficiency and be adaptable to climate change.
- Support the generation of energy from renewable or low-carbon sources.

Reducing Carbon Emissions

4.5 The U.K. government has set out in the Clean Growth Strategy[26], a commitment to consult on improving energy efficiency requirements for new homes when cost-effective and affordable opportunities present themselves. In 2019, the government announced the Future Homes Standard, with a target date of 2025, which aims to make all future homes "net zero ready". In the meantime the Building Regulations have been amended (June 2022), specifically to introduce an uplift in building regulations ahead of the Future Homes and Future Building Standards being introduced.

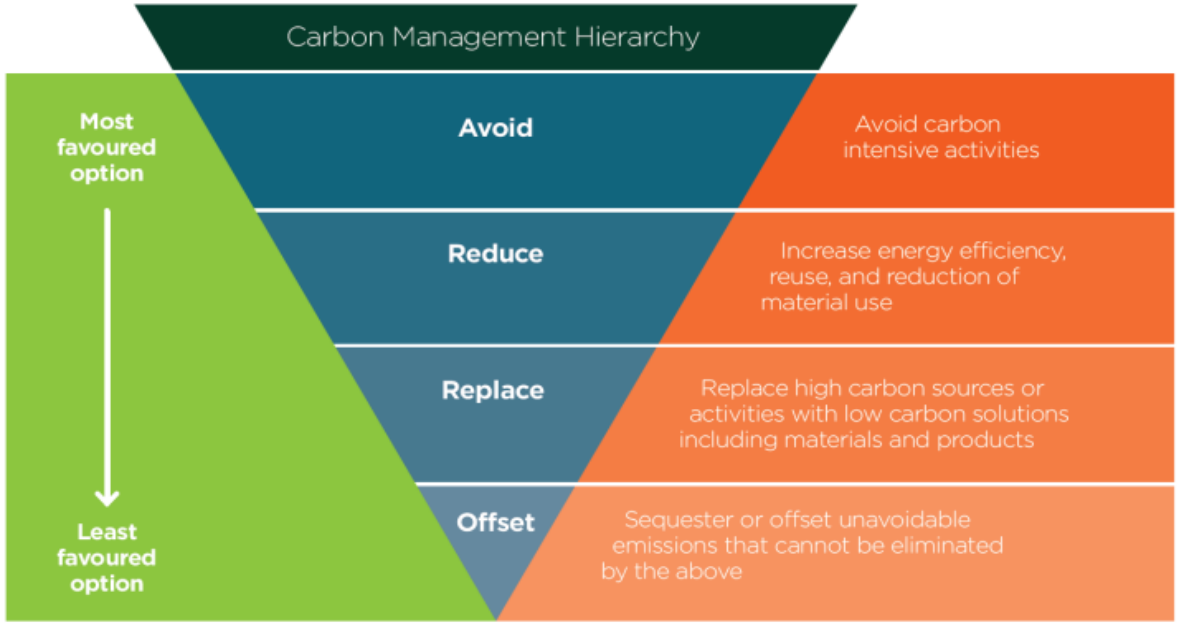


Figure 5: Energy Hierarchy (North London Waste Authority, 2022)

[26] Clean Growth Strategy - GOV.UK (www.gov.uk)

The Building Regulation changes introduced 15 June 2022

4.6 Although transitional arrangements are in place for any applications submitted prior to 15 June 2022, all applications submitted on or after this date are subject to the new Standards. The uplift to Part L (Conservation of Fuel and Power) and F (Ventilation) of the Building Regulations and the new Parts O (Overheating) and S (Infrastructure for charging electric vehicles) came into effect on 15 June 2022. The changes to Part L are a steppingstone to the introduction of the Future Homes Standard in 2025, which is an important contribution to the Government's target to meet net zero emissions by 2050. The Chief Planner has announced that these changes may result in changes to the design of buildings, some of which may result in amended planning applications being submitted and lists the following examples[27]:

- The new overheating requirement (Part O) will necessitate shading and change the amount of glazing in some building designs.
- Part O also requires openable windows that pose a risk falling from height to have a minimum guarding height of 1100mm. This may introduce windows with higher sill heights that are wider, or guarding measures that will be visible externally.
- To pass the new Part L Target Emission Rate, most new homes will need either heat pumps or gas boilers paired with renewable energy generation such as solar panels.

[27] Department for Levelling Up, Housing and Levelling Up. (2022). Chief Planners Newsletter 31 May 2022 (publishing.service.gov.uk)

- To pass the new Part L Target Fabric Energy Efficiency rate, some new homes will need to have more insulation in their walls, which will make them thicker. This may result in some re-planning of plots on sites and occasionally result in a reduction of the number of units. This target rate for fabric energy efficiency may also require a redesign of new homes with room-in-roofs.
- The new infrastructure for charging electric vehicles (Part S) standards will require electric vehicle charge points.

4.7 As heat pumps are a scalable solution to the decarbonisation of heat, it will be necessary to promote a fabric first approach to keep energy bills as low as possible, which can apply to both new and existing properties. The approach used to reduce demand and consumption will vary; however, we suggest these will come from the following[28]:

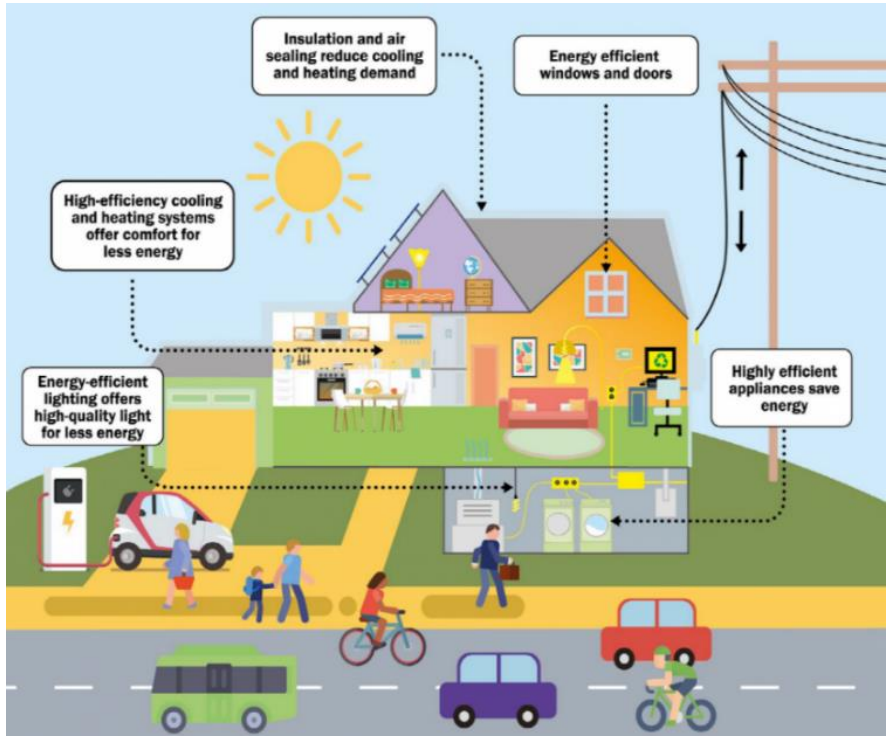


Figure 6: Department for Economy (2022)

- The 'fabric first' approach (illustrated via Figure 6) – prioritising improvement of thermal properties of the building fabric via high levels of thermal insulation and air tightness. This follows the hierarchy above, where fabric comes first, then followed by subsequence increases of various energy systems (e.g. heating and hot water). If done in a retrofit context, then re-sizing of systems may be necessary, but this should come after the fabric stage (particularly prior to heat pump installation). Other examples of design could also include shading design, natural daylighting, natural ventilation and appropriate sizing of building systems.[29]
- Passivhaus strategies – this is considered to be a high-specification 'fabric first' and must fall within the set specification. This includes:

[28] Institute for Sustainability. (2012). Retrofit strategies. Key Findings: Retrofit project team perspectives – Analysis of a selection of Retrofit for Future projects. https://www.instituteforsustainability.co.uk/uploads/File/2236_KeySummary03.pdf

[29] CIBSE (2012). Guide F – Energy Efficiency in Buildings. https://www.cibse.org/knowledge/knowledge-items/detail?id=a0q20000008I7oTAAS

- Calculation of the heating demand via the Passivhaus Planning Package, and must be no more than 15kWh/m^2 for heating and/or cooling, or be designed to peak heat load of 10 W/m^2.
- Total primary energy consumption of no more than 120 kWh/m^2 per year.
- Air Permeability of the building must not exceed 0.6 air changes per hour at 50 Pa.

- BREEAM standards - Non-residential developments of 1000 square metres or more should as a minimum, meet carbon emissions reductions demanded by the BREEAM 'Very Good' standard.

Heating and Power

4.8 As per the energy hierarchy and the measures recommended above, the council will expect the use of appropriate measures and technologies that will enable homes to be efficient. There are parts of Rossendale that would be suitable for wind turbines or solar photovoltaics (PV), so consideration of these technologies will be required for larger developments. Some examples of potential technologies are discussed below:

Solar Technologies – these can include both photovoltaic (PV) and solar thermal panels. Installation is easy on both new and existing buildings, meaning they are versatile and scalable in both domestic and commercial buildings[30]. These could be 'permitted development' with no need to apply for planning permission; however, satisfying various limits and conditions are necessary before a site can benefit from these rights.[31] These will vary depending on whether the project is to a house or a freestanding array; guidance is available on the Government's Planning Portal. Consents will be required in Conservation Areas and for Listed Buildings.

Heat pumps – can work in a number of ways. They take available heat from either the ground, water or air surrounding a property and increase it to a useful temperature in the home. Which option is the most suitable will depend on the individual circumstances of the particular development or property. For example, as Ground Source Heat Pumps take heat from the ground (via boreholes) they will require significant space around the properties. Furthermore, the efficiency and cost of the heat pumps will vary dependent on the efficiency of the property itself[32]. The energy hierarchy and proper interventions (i.e. radiators and insulation) are therefore of key importance.

[30] BEIS. (2013). UK Solar PV Strategy Part 1: Roadmap to a brighter future. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/249277/UK_Solar_PV_Strategy_Part_1_Roadmap_to_a_Brighter_Future_08.10.pdf

[31] Planning Portal. (2022). Solar Panels. https://www.planningportal.co.uk/permission/common-projects/solar-panels/planning-permission

[32] Renewable Energy Hub. (2021). https://www.renewableenergyhub.co.uk/main/heat-pumps-information/is-my-property-suitable-for-a-heat-pump/

Hydropower – is an energy harnessed from falling or fast flowing water. This can be from rivers or manmade installations, where water flows from a high-level reservoir down through a tunnel and away from a dam. Turbines placed within the flow of water extract its kinetic energy and convert it to mechanical energy into electricity.[33] For example, Lancaster Co-Housing uses hydro that can generate up to 160 kW of electricity (enough for 200 homes)[34], with the excess sold to the grid through a Feed-in-Tariff and returns made for those who invest within the cooperative. This, along with solar panels has helped reduced carbon from the site by an estimated 540t of CO_2 annually.

Lancaster Co-Housing (Carbon Copy, 2022)

Biomass – via boilers or wood-fuelled heating systems, which use logs, woodchips and wood pellets. However, it is necessary to consider the potential disturbance on protected species, the impact of chimneys, storage of fuel and the impact of your chosen fuel. Furthermore, the wood sourced should be as local as possible, as transport has shown to contribute up to 60% of the total emissions[35].

Low carbon district heat network - Where possible, homes and buildings should connect to an existing or planned district heat network. District heating networks supply heat to multiple buildings from a central heat source or energy centre through a network of pipes and heat exchangers. District heating schemes are more viable in new developments due to the incorporation of civil works on site and provide a more carbon efficient means of energy supply than individual heating systems. The system should incorporate low-carbon technologies such as heat pumps.

Battery storage – this is used to overcome fluctuations in the generation of electricity from wind or solar energy, and planning applications are coming forward.

On-site renewables

[33] BEIS. (2013). Harnessing hydroelectric power. https://www.gov.uk/guidance/harnessing-hydroelectric-power

[34] 8-Lancaster Cohousing-V2 (vimeo.com)

[35] Paletto, A., Bernardi, S., Pieratti, E., Teston, F., Romagnoli, M. (2019). Assessment of environmental impact of biomass power plants to increase the social acceptance of renewable energy technologies, Heliyon, 5 (7) https://doi.org/10.1016/j.heliyon.2019.e02070.

4.9 New developments will be required to generate a minimum of 10% of energy needs from onsite renewables. This will apply to all developments of 10 homes or more and to non-residential developments in excess of 1000 square metres.

4.10 Solar technologies are a prime candidate for use in generating the required renewable energy threshold. However, wind turbines, hydropower or heat pumps – or a mix of technological solutions - might be appropriate to the development.

4.11 Greater in-built energy-efficiency will make the target of 10% easier to achieve.

Existing Homes

4.12 As stated previously in this document, the life-cycle approach is vital to understanding emissions, so there will be need for a 'whole building approach'. For historic buildings, this will require finding balanced solutions that save energy, maintain heritage significance, and maintain a comfortable environment[36]. For all buildings, there are varieties of low-cost measures that are compatible. The following are important considerations:

- Understanding the building's original heat, cooling and ventilation before additional measures are included. This will aid in understanding what interventions are suitable and how they may affect your building's thermal performance. To understand this, you must consider the building's thermal envelope, which includes everything that shields your home from the outdoors[37].
- Addressing damp and draught problems, which may require Building Regulations, but not necessarily planning permission.
- In addition, having an understanding that any interventions that improves air tightness may increase moisture levels, so adequate ventilation will need managing to stop any extra damp.

4.13 The following measures would cut energy emissions in dwellings, and would not require planning permission:

- Reducing energy demand through cost-effective measures such as installation of curtains and carpets, with the latter reducing your energy needs by around 10%[38].
- Draught proofing, particularly around doors and windows, can also improve the thermal performance of your building.

[36] Historic England. (2018). Energy Efficiency and Historic Buildings - How to Improve Energy Efficiency. https://historicengland.org.uk/images-books/publications/eehb-how-to-improve-energy-efficiency/heag094-how-to-improve-energy-efficiency/

[37] IECC. (2019). What is a buildings thermal envelope? https://www.ieccode.com/2019/08/22/what-is-a-buildings-thermal-envelope/

[38] Department of Energy. (2021). Energy efficient window coverings. https://www.energy.gov/energysaver/energy-efficient-window-coverings

5. Water interventions

5.1 The Rivers Irwell and Spodden run through Rossendale, so considerable areas lie within Flood Zones 2 & 3[39]. The towns in Rossendale have a long history of flooding from the river, urban drainage and from surface run-off from fields and moorlands. During the Boxing Day Floods (caused by Storm Eva), more than 350 properties in Rossendale flooded on 26 December 2015 due mainly to surface water flooding[40]. This will worsen with Climate Change[41]. Flood maps showed that around 650 properties were at risk of flooding in a report published in 2009, and this is to increase to 1,000 properties by 2100.[42]

Credit: Robert Wade

Link to Local Plan

5.2 Chapter 4: Environment

Policy ENV9: Surface Water Run-Off, Flood Risk, Sustainable Drainage and Water Quality. Developments should be aware:

- All development proposals will be required to address flood risk from all sources (including from rivers, surface water, infrastructure failure and groundwater).
- Planning permissions for proposals cannot include unacceptable flood risk, or materially increase risks elsewhere.
- Proposals should include the most up-to-date Flood Risk available from the Environment Agency, the Strategic Flood Risk Assessment, the Lead Local Flood Authority (LLFA) and the sewage undertaker.

[39] UK Government. (2022). Flood map for planning. Find location - Flood map for planning - GOV.UK (flood-map-for-planning.service.gov.uk)
[40] Rossendale Borough Council. (2016). Strategic Flood Risk Assessment 2016 | Rossendale Borough Council para 3.6.3
[41] Environment Agency & DEFRA. Environment Agency sets out roadmap for more flood and climate-resilient nation - GOV.UK (www.gov.uk)
[42] Environment Agency. (2009). Irwell Catchment Flood Management Plan. https://assets.publishing.service.gov.uk/

- Development proposals are required to manage surface water using the drainage hierarchy in Figure 7. Applicants wishing to discharge surface water into a public sewer will need to submit evidence demonstrating why alternative options are not possible. Please refer to the SuDS pro-forma available on the LLFA website[43].
- In all design phases, applicants will have to incorporate sustainable drainage systems and consider surface water management.

5.3 New developments shall incorporate appropriate Sustainable Drainage Systems (SuDs) in accordance with the National Planning Policy Framework, Planning Practice Guidance, National Standards for Sustainable Drainage Systems[44], the SuDS Manual (C753), the SuDS Pro-Forma (Appendix D) and the LLFA Planning Advice.

Guidance on how to comply with policies

5.4 As directed by local and national policy, the key aim should be to manage flood risk by developing in areas with low flood risk and to ensure that there is no risk of flooding elsewhere. The following additional guidance is below:

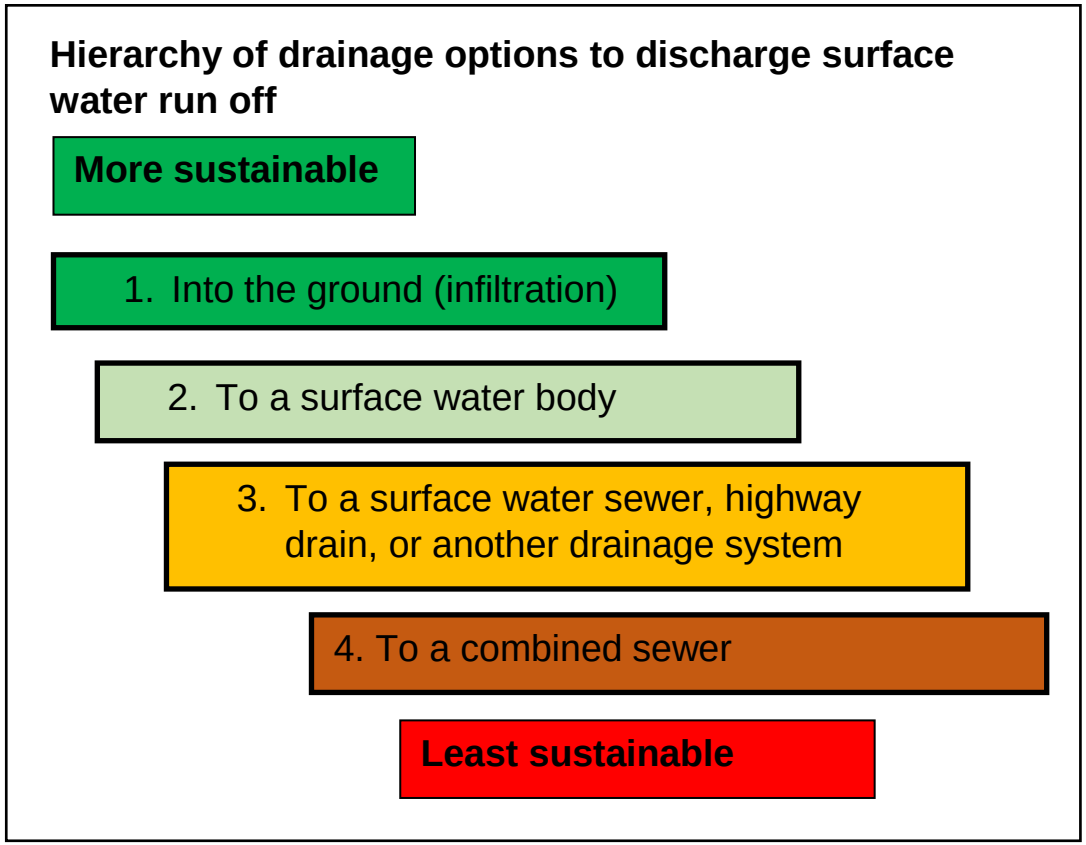


Figure 7: Hierarchy of drainage options to discharge surface water run off based on Planning Practice Guidance for flood risk and coastal change, Paragraph 080

[43] Lead Local Flood Authority (2022). Sustainable drainage systems pro-forma. https://www.lancashire.gov.uk/business/business-services/pre-planning-application-advice-service/lead-local-flood-authority-planning-advice-service-for-surface-water-and-sustainable-drainage/

[44] Department for Environment, Food and Rural Affairs. (2015). Non-statutory technical standards for sustainable drainage systems. Retrieved from: https://www.gov.uk/government/publications/sustainable-drainage-systems-non-statutory-technical-standards

- Where site-specific flood risk assessments are required, developers should consider future sources of flooding, alongside the potential increase of flooding expected as a result of climate change. Allowances for climate change are available from the Environment Agency (EA)[45].
- Use should be made of the EA's pre-application planning service[46] and the Lancashire LLFA Planning Advice Service[47]. In addition, United Utilities also offer pre-development advice[48].
- Where development may affect use of drainage infrasctructure that crosses under the strategic road network that National Highways operate, applications should demonstrate that surface water runoff from sites can be accommodated in the design capacity of any culvert(s) affected.
- As stated, preference should be to develop in lower risk areas (eg flood zone 1 and areas identified as at very low risk of surface water flooding[49]). Please note that risks may increase with climate change. Where unavoidable, development should be safe through its lifetime and not increase risk elsewhere (including not displacing surface water flood risk elsewhere). Furthermore, buildings should include measures to avoid flooding; however, these designs should not justify the development in high-risk areas (as per the Planning Practice Guidance[50]).

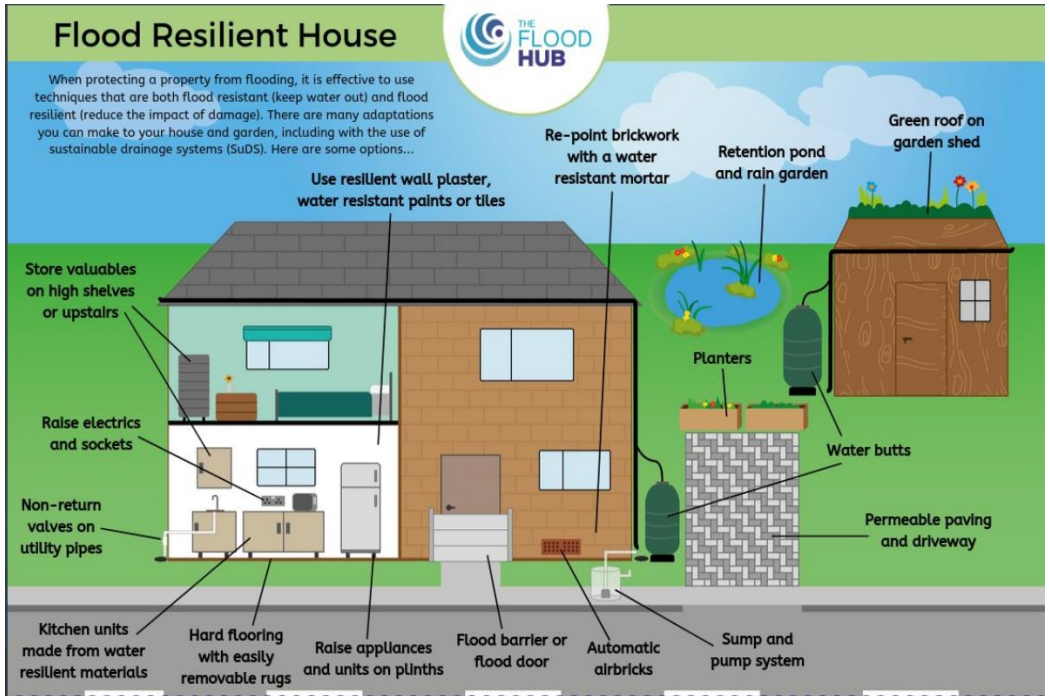


Figure8: Flood Resilient House (The Flood Hub, 2020)

[45] Environment Agency. (2022). Flood risk assessments: climate change allowances. Retrieved from: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances

[46] Natural England, Environment Agency. (2018). https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals.

[47] LLFA pre-application advice for surface water and sustainable drainage systems - Lancashire County Council

[48] United Utilities Pre-Development Guidance. https://www.unitedutilities.com/builders-developers/your-development/planning/pre-development-guidance/

[49] Environment Agency (2022). https://check-long-term-flood-risk.service.gov.uk/map

[50] Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government. (2021). Flood risk and costal change https://www.gov.uk/guidance/flood-risk-and-coastal-change#making-development-safe-from-flood-risk. Paragraph 054 Reference ID:7-054-20150415

- To increase the resilience of the development, especially for vulnerable developments in flood zone 2, the following should be implemented [51]:
    - The finished floor levels should be a minimum of whichever is higher of 300mm above the average ground level of the site, adjacent road level to the building or estimated river flood level.
    - Doors, windows and other openings should be flood resistant.
    - Installation of flood resistant materials and electrical equipment.
- Flood-resistant construction can prevent entry of water or minimise the amount that water may enter where there is short duration flooding with depths of 600mm.[52]
- *Improving the Flood Performance of New Buildings: flood resilient construction* (DCLG, 2007) gives guidance to improve the resilience of new properties in low or residual flood risk areas. An option is to use flood durable materials that provide easy draining and drying[53]. Boundary walls and fencing should have flood resistant barriers.
- Impermeable surfacing can lead to significant accumulation of surface water, so developers should prioritise permeable surfaces alongside other interventions (see figure 8). If you are planning to cover an area of your front garden by a hard surface of more than $5m^2$ which is not made of porous materials than water run-off should be directed to a permeable area within the curtilage of the house, if not, you will need to apply for planning permission.
- Historic England also provides some examples of what can be done in flood-risk areas to make older homes more resistant and resilient to flooding by[54]:
    - Adding brick covers to prevent water entering through ventilation holes.
    - Adding floorboards to doorways.
    - Installing temporary flood barriers, consisting of interlocking units.
    - Avoiding coatings, tanking and other 'waterproofing products that trap moisture and slow drying rates.

[51] Environment Agency and DEFRA. (2022). Preparing a flood risk assessment: standing advice https://www.gov.uk/guidance/flood-risk-assessment-standing-advice
[52] Planning Practice Guidance, Paragraph 059: Reference ID: 7-059-20140306.
[53] Ministry of Housing, Communities and Local Government. (2007). Improving the flood performance of new buildings: flood resilient construction. https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings
[54] Historic England. (2022. Making your home flood resistant and resilient. https://historicengland.org.uk/advice/your-home/flooding-and-older-homes/making-your-home-flood-resistant-and-resilient/

Sustainable Drainage Systems (SuDSs)

5.5 SuDS are designed to both manage the flood and pollution risks resulting from urban runoff, reducing pressure on the sewerage network, and to contribute wherever possible to environmental enhancement and place making. With this in mind, the multi-functionality and multiple benefits of SuDS must always be considered[55] including their importance for amenity and biodiversity. Indeed, SuDS should be designed in accordance to the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). SuDS can be developed alongside the landscaping plan of new developments (eg via green roofs, permeable surfacing, soakways and filter drainage, swales, bioretention tree pits/ rain gardens, basins and ponds as well as reedbeds and wetlands). As per Policy ENV9 of the Local Plan, this is a vital part of the application process and alternatives are only acceptable where it is impractical or there are other exceptional circumstances. An example of this and other case studies are available via Figure 9 and 10. Appropriate allowances for climate change (in accordance with national EA guidance) and urban creep such as paving of front garden, extension to buildings (10% required by LLFA) must be included when designing SuDS.

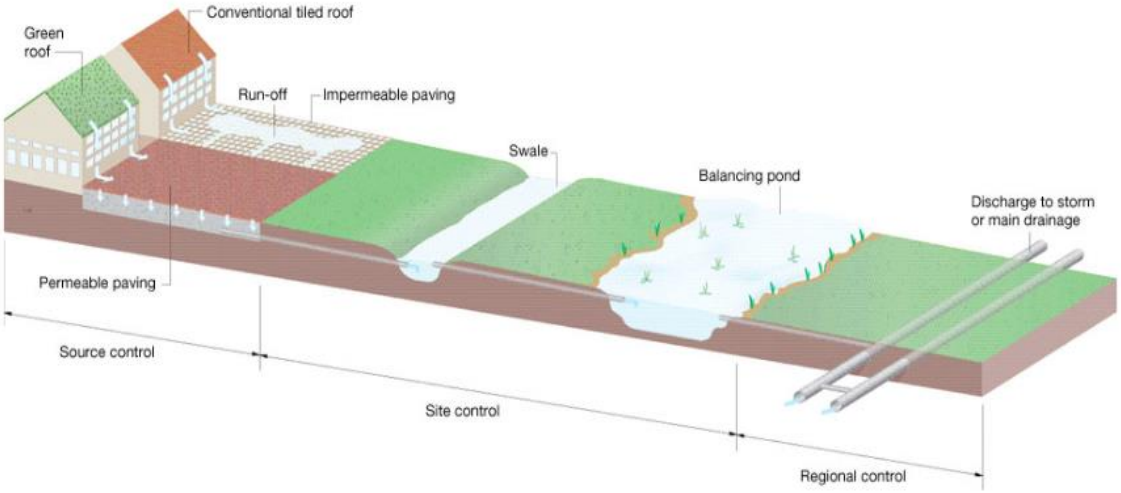


Figure 9: SuDS example (PermCalc, 2022)

5.6 Guidance for SuDSs are available on the Flood Hub website[56] and Appendix D shows a draft Pro-Forma expected to be received for planning applications for major developments. Also, the LLFA recommendations on surface water management given via the planning advice service should be incorporated into new developments.

[55] Local Government Association. (2022). Sustainable drainage systems | Local Government Association

[56] North West Regional Flood & Coast Committee. (2022). North West SuDS Pro-Forma Template for Supporting Guidance. Retrieved at: https://thefloodhub.co.uk/wp-content/uploads/2022/05/NW-SuDS-Pro-forma-Guidance-v5.-May-2022-002.pdf

5.7 East Ordsall Lane, Salford

This project (Figure 10) features an innovative use of interpretation to help explain the scheme, but also to help better inform and educate for other SuDSs schemes. The scheme includes the following:

- Seven retrofit SuDS trees – correctly chosen to maximise opportunities for air pollution.
- Two bioretention features. Water from the carriageway is conveyed from the kerb drainage collection system
- Geo-cellular system to provide better attenuation through suitable soil, which provides abundant source of water for trees.
- Permeable to all water to drain into root system through perforated pipes.
- An education system that allows residents to understand the completed work and its benefits.

This scheme has led to a reduction in water entering the sewers, whilst also preserving the rainwater for biodiversity growth instead of requiring fresh water. It also demonstrates how SuDSs are possible at the micro scale, as opposed to simply having large and complex schemes that may limit the viability of a development.

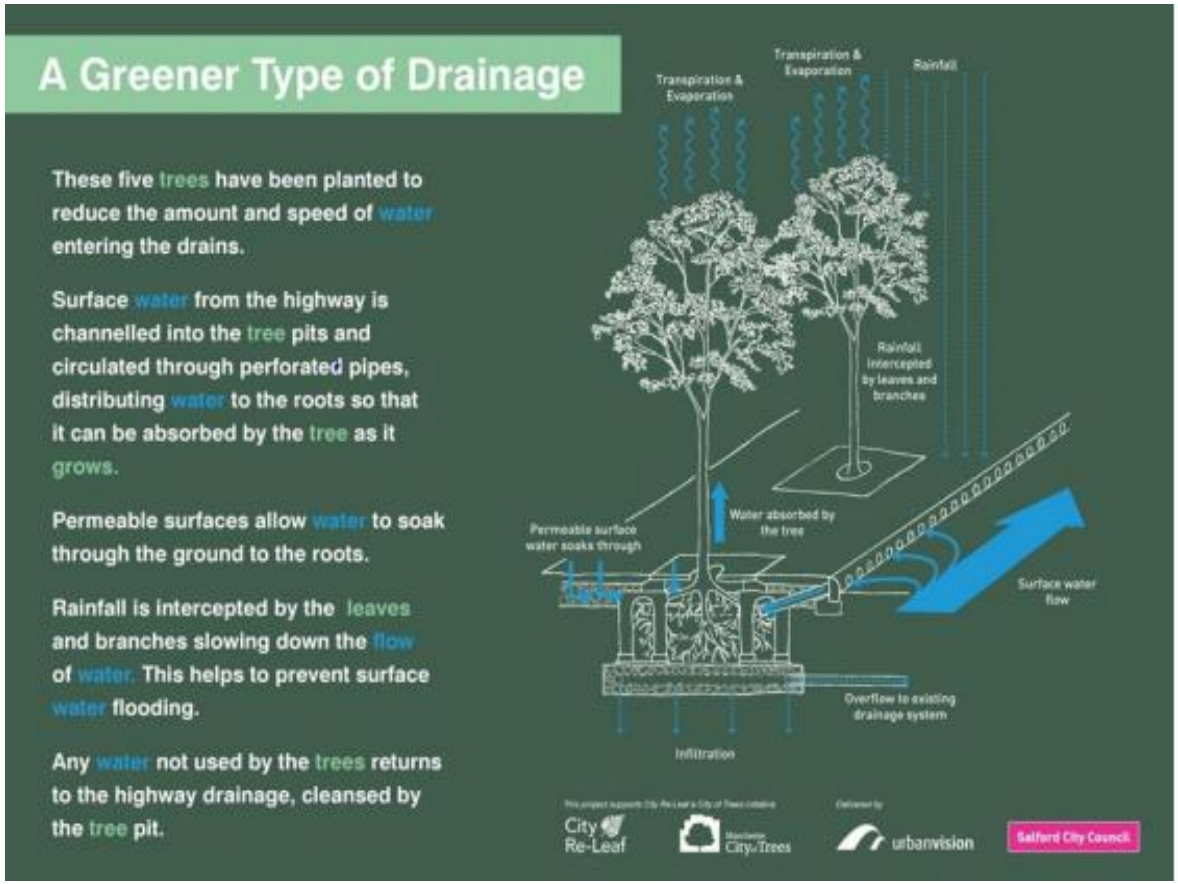


Figure 10: Salford SuDS example (Susdrain, 2022)

6. Biodiversity and Green Infrastructure

6.1 Green infrastructure is defined in the National Planning Policy Framework (NPPF) as "A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity".

6.2 The Borough has an extensive network of public rights of way covering 660 km and cycle routes extending to 64km with connections to neighbouring boroughs. Rossendale is also reasonable reach in biodiversity with 3 Sites of Special Scientific Interest, 7 Local Geodiversity Sites, 52 Biological Heritage Sites, one Local Nature Reserve as well as 3 ancient woodlands, river valleys and other priority habitats, known as s41 habitats. Section 41 of the Natural Environments and Rural Communities Act (2006) directs Local Authorities to have regard to the conservation of habitats of priority for the conservation of biodiversity. These include threatened, rare and sensitive habitats such as hedgerows, acidic grassland, native species broadleaved woodland, blanket bogs etc.[57] In particular, the Borough comprises large areas of moorlands, including peat deposit that play an important role in storing carbon and, if restored into a functioning ecosystem, can act as carbon sink. The moorlands also have a significant role for rare wildlife as well as water regulation[58]

Links to the Local Plan:

[57] Environmental Network Study available to download at https://www.rossendale.gov.uk/downloads/download/10821/environmental_network_study_2017

[58] England Peat Action Plan (publishing.service.gov.uk)

6.3 The protection and enhancement of the Borough's green infrastructure and its crucial role in mitigating and adapting to climate change is set out in the vision, objectives and strategic priorities of the Local Plan. The Local Plan aims to protect and enhance the Borough's landscapes and natural assets for their ecological, recreational and economical values including their role in tackling climate change. This is further highlighted in one of the objectives of the Plan to reduce the impact and adapt to climate change by promoting and protecting the Borough's green infrastructure alongside other measures (e.g. flood prevention measures, SuDS, renewable energy projects and sustainable travel). The enhancement of green infrastructure is also one of the strategic priorities of the Plan and so buildings must consider wildlife and biodiversity (as per Figure 11).

Figure 11: Building with wildlife in mind (Wildlife Trust, 2018)

6.4 Policy ENV3: Landscape Character and Quality

- Rossendale has a distinctive landscape, so the Council expects development proposals to conserve and, where possible, enhance the natural and built environment.
- Developments should retain existing watercourses, trees and green infrastructure that make a positive contribution to the area.

6.5 Policy ENV5: Green Infrastructure Networks

- Development proposals should support the protection, management and enhancement of the Borough's green infrastructure
- Schemes that improve the integrity and connectivity of the green infrastructure network will be supported
- The principle to first avoid any negative impacts, then mitigate impacts and as a last resort compensate for them applies
- If a net loss of green infrastructure on the development site cannot be avoided, schemes could be permitted if:
    - the function and connectivity of the network should nonetheless be retained or replaced;
    - New or enhanced elements should be integrated in the development such as natural greenspaces and trees;
    - The proposals do not have any unacceptable impact on amenity, surface water or nature conservation.
- Wherever possible new green infrastructure provided should maximise the functions and benefits of the existing network

6.6 Policy ENV10: Trees and Hedgerows

- Development proposals must seek to avoid the loss of, and minimise the risk of harm to existing trees, woodland, and/or hedgerows of visual or nature conservation value.
- Where trees and/or woodlands are to be lost as a part of a development, this loss must be justified as part of an Arboriculture Implications Assessments (AIA) submitted with the application.
- Developments should, where appropriate:
    - Not result in loss of trees or woodland which are subject to a Tree Preservation Order or which are worthy of protection.
    - Not involve building within the canopy or root trees, woodlands or hedgerows, except when construction is in accordance with the most up-to-date British Standard.
    - Make a positive contribution to Green Infrastructure and/or biodiversity.
    - Ensure incorporation of trees into the design of new streets, or otherwise, to support the Rossendale Forest and community orchards.

6.7 The green and blue infrastructure are shown separately on the Policies Map 2021 (see Figure 12 for an extract of the Policies Map) however green infrastructure includes blue infrastructure as described in the NPPF definition.

6.8 The green infrastructure shown in Figure 12 comprises Rossendale Grassland and Woodland Ecological Network as defined by the Lancashire Ecological Network Maps and some former 'greenlands' sites from previous Local Plans. A Wetland and Heath Network is being progressed by LERN, which may come later. The Rossendale grassland and woodland networks comprise of Core Areas, which are sites designated for their ecological value at the national or county level and of corridors. The corridors fall into three categories: linear corridors (such as woodland strips, hedgerows, rivers and streams), stepping stones (habitats in good condition that provides shelter and enables feeding and resting) and landscape corridors (mosaic of habitats enabling species to move between areas). These categories are not on the Policies Map, but are available on the Rossendale Ecological Network maps[59]. The blue infrastructure in Figure 12 comprises lakes, reservoirs, rivers and streams.

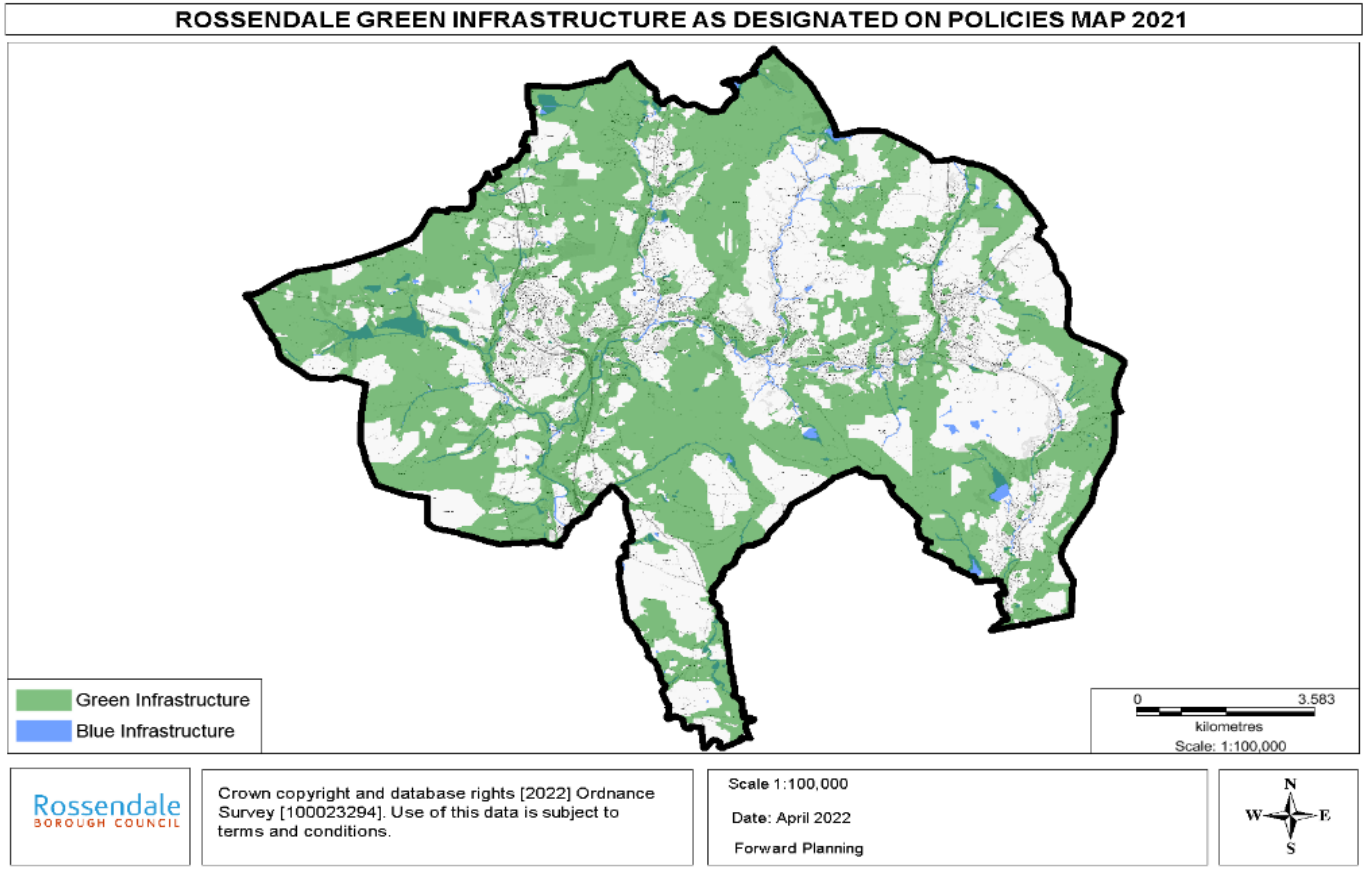


Figure 12: Rossendale Green and Blue Infrastructure Network

[59] Rossendale Borough Council. (2015). Rossendale Ecological Network. https://www.rossendale.gov.uk/downloads/download/11158/lancashire_ecological_network

6.9 Figure 13 represents the green infrastructure in the form of a diagram, which identifies a river, valley and rural network and Greenland sites. More information on this is available in the Environmental Network Study[60].

6.10 A Landscape Management Plan is required on all large-scale developments as part of the planning application. This Plan will aim to provide information on managing landscape elements within a site for the purposes of enhancing amenity and biodiversity and strengthen its connectivity to the wider landscape. In terms of timescale, the Plan should identify achievable steps over a 30-year timescale so there can be confidence of long-term biodiversity monitoring. Further guidance on how to avoid the loss of biodiversity is available in Policy ENV10 of the Local Plan, which any new development must consider as part of the Planning process application. This long-term vision will provide consistent opportunities to reduce flood risk in the area. This is possible through the

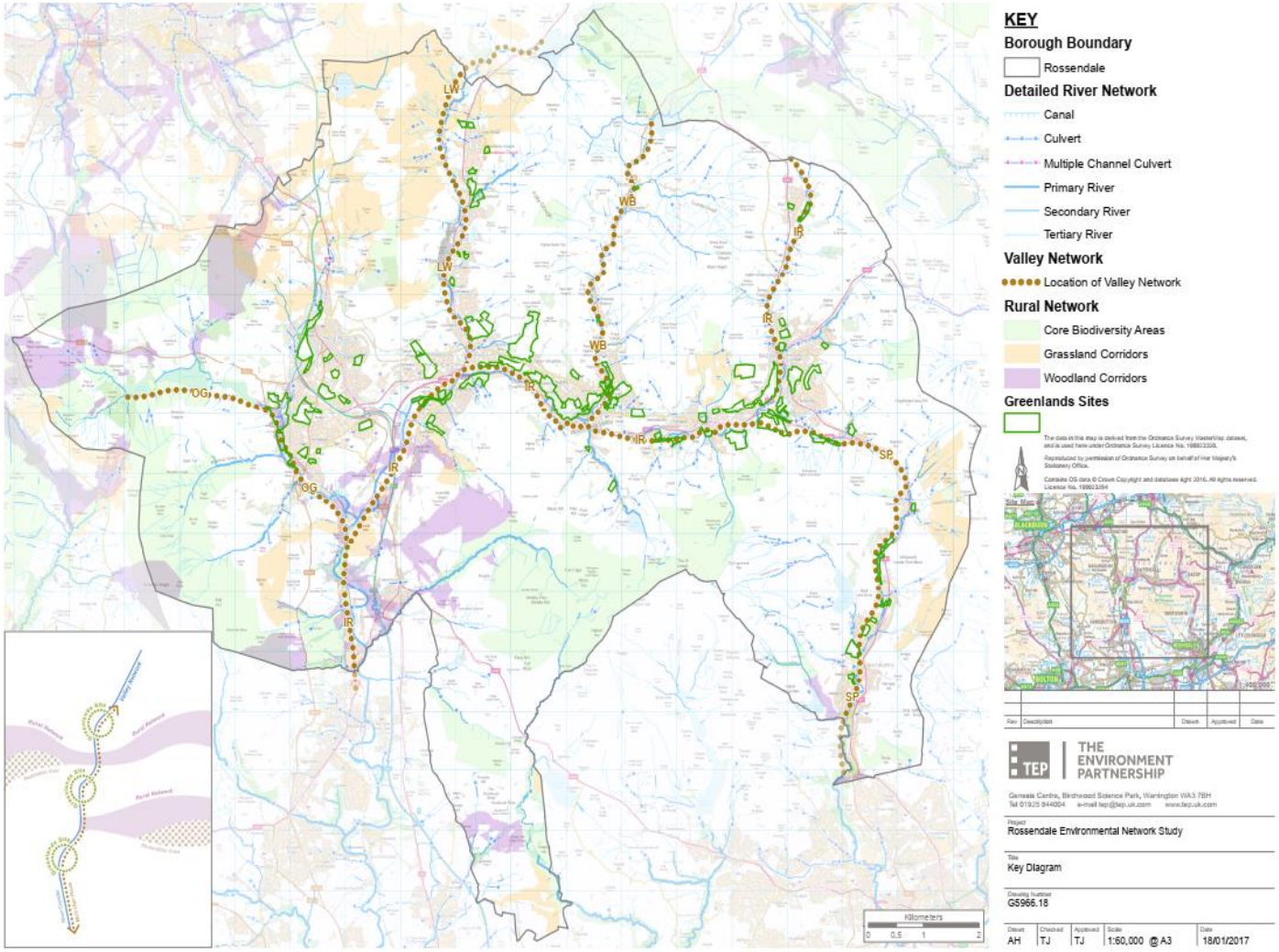


Figure 13: Environmental Network Study Diagram

[60] Rossendale Borough Council. (2017). Environmental Network Study. https://www.rossendale.gov.uk/downloads/download/10821/environmental_network_study_2017

drainage hierarchy (Figure 8), alongside the layout of the property (Figure 7).

Guidance on how to apply the policies

6.11 Green infrastructure is central to resilience to climate change, as trees, shrubs, grass and other plants can absorb greenhouse gases from the atmosphere, whilst providing habitats and reducing flood risk. The infrastructure itself can also deliver resident benefits by improving active travel choices. General measures on how to improve green infrastructure includes:

- Development proposals should focus on preserving and improving the functions of the rural and valley networks, which include biodiversity, landscape, heritage, carbon-storage, flood resilience and recreation.
- If conservation or improvements are not feasible on the development site, compensating measures including biodiversity net gain offsetting are possible to provide improvements elsewhere in the network.
- Measures to return rivers to a more natural state by de-culverting and re-naturalising riverbanks and flood plains are expected as they provide significant opportunities for the creation of high quality blue-green infrastructure and biodiversity net gain. For example, the 8m buffer around waterways offers opportunity to plant native tree species to enhance amenity, biodiversity and improve water quality. In addition, schemes proposed along waterways (considering a stand-off of 8m) should provide high quality frontages and flood risk management measures.
- Clough woodland in particular should be enhanced and extended whenever possible;
- Development proposals should seek to enhance public footpaths and cycleways. This is especially important where there are gaps in the existing infrastructure or if it is insecure or unavailable to people with disability. This could also help link urban areas to the countryside. It can also provide alternative ways of transport by cycling and walking for short journeys. Key routes identified in the Local Plan include the “Valley of Stone Greenway”, the National Cycle Route 6, the Rawtenstall to Clow Bridge Reservoir route, the Pennine Bridleway, the Irwell Sculpture Trail and the Rossendale Way.
- Development proposals should retain and enhance the distinctive valley industrial heritage by providing adequate green infrastructure.
- The Council will encourage measures to manage land more effectively to increase biodiversity and new development proposals must deliver a biodiversity net gain, with demonstration possible via the latest Defra Biodiversity Metric tool. Also, wildlife friendly fencing (eg ‘Hedgehog Highways’) and native species mixed hedgerows will be supported whenever possible.
- Green infrastructure projects that can slow the flow of water such as sustainable drainage systems will be expected. Well designated SuDS can help connect habitats to create green corridors (eg swales, SuDS trees alongside roads) therefore also enhancing biodiversity as well as amenity.

- Greening measures such as planting new native tree species (including new tree-lined streets) and creating green roofs or green walls will also be supported as it can contribute to the storage of carbon, a reduction of the urban ‘heat island’ effect as well as reducing airborne pollutants.
- Measures that provide multi-benefits in terms of biodiversity gain, flood risk resilience, carbon storage, provision of shade will be encouraged. For example, actions to restore moorlands will be supported in order to improve carbon storage, increase biodiversity, slow the flow of water downstream, improve water quality and reduce erosion. Moorlands also provide recreational opportunities and visual amenity to local communities.

6.12 Furthermore, measures to improve green infrastructure in developments should include:

- Consideration at the earliest stage. Applicants should liaise with suitable stakeholders dependent on what species are within a certain area.
- Part 6 Section 98 of the Environment Act requires Biodiversity Net Gain to be a consideration within the planning process. Therefore, any ecological consultants will need to ensure that data collected is suitable for Natural England’s Biodiversity Metric Calculator.
- As highly fragmented landscapes affect species decline, applicants should maintain existing habitat networks and integrate new developments into existing habitat networks. This will increase the habitat mosaics and would be preferable in the planning process.
- Proposals should ensure that any new green infrastructure enhance and are well connected to the existing network.
- Given the energy efficiency mentioned in previous sections, trees should provide shade for building, to reduce both solar gain and potential overheating of properties during the summer months. Likewise, this should be adopted in public open space areas and seating areas.

7. Monitoring

7.1 To help assess the effectiveness of planning policies on the mitigation and adaptation to climate change a set of indicators has been proposed in the Rossendale Local Plan 2019 to 2036. The monitoring of these indicators can be viewed in the Authority Monitoring Reports[61] (from year 2021/22). Below is a list of the indicators related to this Climate Change SPD.

- Reducing the dominance of fossil-fuelled vehicles via encouraging sustainable and more active transport:
  - Number of electric vehicle charging points approved or completed
  - Length of new walking/cycle routes constructed or enhanced
  - Amount of investment in routes

- Improving energy efficiency and promoting renewables in the Borough
  - Number of dwellings completed above required building standards for energy efficiency
  - Amount of wind energy capability approved / generated
  - Amount of other renewable energy capability approved / generated

- Water interventions
  - Number of SuDS provided

- Biodiversity and Green Infrastructure
  - Addition (in hectares) of Green Infrastructure networks per approval or completion
  - Amount of net gain / loss of biodiversity in the Borough
  - Number of trees subject to a Tree Preservation Order lost

[61] https://www.rossendale.gov.uk/downloads/download/10832/authority_monitoring_reports

Appendix A: Cycle Routes within Rossendale

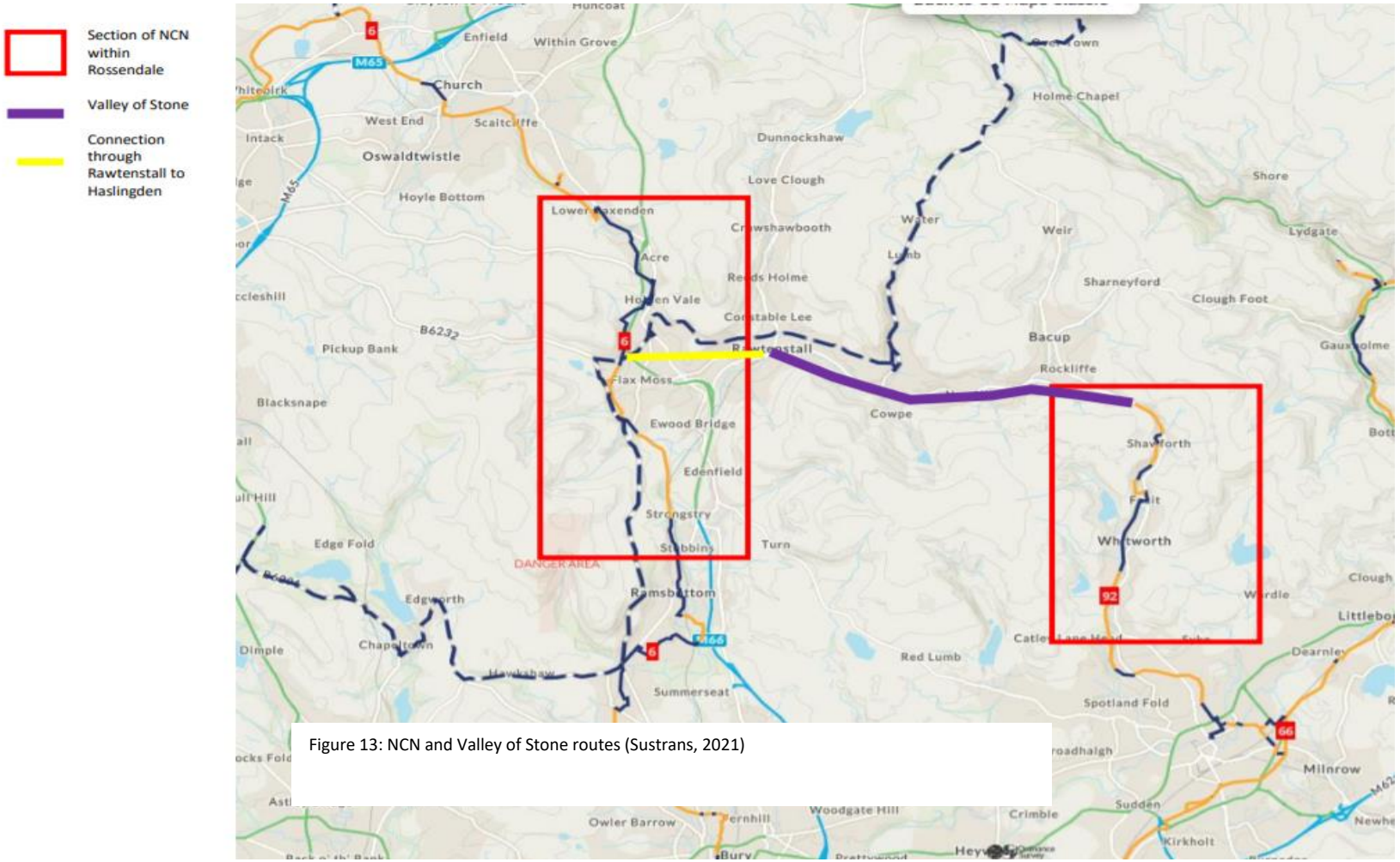


Figure 13: NCN and Valley of Stone routes (Sustrans, 2021)

Appendix B: Glossary

Climate Change Climate change is a large-scale, long-term shift in the planet's weather patterns or average temperatures. (MET office)

Climate change adaptation Adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which moderate harm or exploit beneficial opportunities.

Climate change mitigation Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions

Flood Risk Assessments (FRA) Site-specific assessments, which identify the risks to a site or premises from flooding from all sources, and any risk that may arise elsewhere because of development. These assessments are required for development proposals which are in areas of known flood risk (e.g. in flood zones 2 and 3) and for all proposals over 1 hectare in size

Green Infrastructure A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity."

Habitats of Principal Importance in England Fifty-six habitats, identified as requiring action under the UK Biodiversity Action Plan, continue to be conservation priorities. These habitats are included in the UK Biodiversity List published by the Secretary of State under Section 41 (S41) of the Natural Environment and Rural Communities (NERC) Act, which came into force on 1st Oct 2006.

Lead Local Flood Authority (LLFA) Local Authority (in Lancashire, the County Council) responsible for developing, maintaining and applying a strategy for local flood risk management in their areas and for maintaining a register of flood risk assets. They also have lead responsibility for managing the risk of flooding from surface water, groundwater and ordinary watercourses.

Low Carbon Energy Power produced from technologies, which produce a low amount of carbon dioxide compared to fossil fuels

Major Development For dwellings, a major development is one where the number of residential units to be constructed is 10 or more, or if the application does not state the number of units to be constructed, the site area is 0.5 hectares or more. For all other uses, a major development is one where the floor space to be built is 1,000 square metres or more, or where the site area is 1 hectare or more.

Sustainable Drainage Systems (SuDS) SuDS are an approach to managing rainwater falling on roofs and other surfaces through a sequence of actions. The key objectives are to manage the flow rate and volume of surface runoff to reduce the risk of flooding and water pollution. SuDS also P a g e | 205 reduce pressure on the sewerage network and can improve biodiversity and local amenity.

Sustainable Transport Modes Including walking and cycling, ultra-low and zero emission vehicles, car sharing and public transport

Appendix C - Checklist for Climate Change Statement

Applicants are to prepare a statement demonstrating how the development is designed to be adaptable to climate change, how it incorporates energy efficiency principles and adopts principles of sustainable construction including Sustainable Drainage Systems. This is to show how the proposal complies with Policy ENV1 criteria (q) of the Local Plan 2019 to 2036.

Topic	**Measures**	**Addressed in planning application?** (Yes or No)	**Brief Summary of Measures or Explanation of why not addressed**	**Signposting to relevant information in planning submission**
Chapter 3: Reducing the dominance of fossil-fuelled vehicles via encouraging sustainable and more active transport				
Local facilities accessible through walking/cycling (within 15 minute walk or cycle of new developments).	Traffic calming			
	Maximising the number of internal pedestrian routes through the site and avoiding cul-de-sacs			
	Appropriate crossings for pedestrians and cyclists.			
	Signposting to active travel routes and local facilities			
	Car Clubs			
	Prioritising Walking, Cycling and Public Transport			
Prioritising Walking, Cycling and Public	Incorporating 'no-through streets' for cars in all residential areas, with prioritised access for people walking and cycling			
	Dedicated traffic-free walk and cycle routes to local facilities			

Prioritising Walking, Cycling and Public (contd)	Segregated Cycle routes where possible linking to wider area including in new developments			
	Short cuts for cyclists.			
	Safe, secure and convenient cycle parking in accordance with secure storage of electric bikes			
	Shower facilities provided in non-residential developments.			
	Easy access to a range of transport modes.			
	Easy transition from cycling and walking to public transport.			
	Enhanced bus frequencies and off-site priority measures, such as priority at signals and bus lanes, from day one of occupation			
	Bus priority within sites, and work with bus operators to ensure the geometry of routes is suitable and stops are well located and designed			
	Education/promotion campaigns to residents.			
Facilitating Electric Vehicles	Electric vehicle (EV) charge points for every individual house within new residential development and one charger per every 5-apartment building.			
	EV charging points of at least 22kw and a universal socket for every 10 parking spaces in non-residential car parks and passive provision (e.g. cable routeing) for the remaining spaces.			

	Other (please state)			
Home Working	A room with a wall length of at least 1.8m, capable of accommodating a desk and shelving.			
	Good internal daylight, reducing the need for artificial lighting			
	Adequate ventilation, ideally natural through an openable window.			
	Other (please state)			
Chapter 4: Improving energy efficiency and promoting renewables in the Borough				
Energy Hierarchy	Adherence to the energy hierarchy			
Reducing Carbon Emissions	Residential developments to achieve as a minimum the equivalent of Code for Sustainable Homes level 4 – a 19% improvement on the Dwelling Emission Rate over the Target Emission Rate as defined in Part L1A of the Building Regulations.			
	Non-residential developments of 1,000 square metres or more should, as a minimum, meet carbon emissions reductions demanded by the BREEAM 'Very Good' standard.			
	Plot and block orientation to maximise solar gain.			
	Window positioning to maximise solar gain			
	Clothes drying space			
	Use of local sustainable material			

Reducing Carbon Emissions (Contd)	Natural ventilation and easy to regulate ventilation (airtight when needed).			
	Solar/low energy internal and external lighting (e.g. LED lightbulbs).			
	Using a higher level of roof and wall insulation than required by Building Regulations.			
	High R-value glazing.			
	Use of heavy curtains, blinds and/or carpets.			
	Draft proofing.			
	Heating system & controls.			
	Heat recovery systems.			
	Connection to existing low carbon heat network.			
	Use of low carbon and renewable energy			
	Inclusion of community investment			
	Other (please state):			
Density and Mixed Use	Higher densities and mixed uses in sustainable locations and at key transport nodes.			
	Horizontal and vertical mix of uses within blocks where appropriate.			
	Active frontages/edges with opportunities for natural surveillance.			
	Other (please state)			

Optimising Development Orientation	Buildings orientated to maximise solar gain			
	Natural shading, such as through building overhangs, balconies, grouping and trees.			
	Other (please state)			
Managing Waste and Using Sustainable Materials	Retention and re-use of existing building			
	Use of locally sourced and sustainable building materials.			
	Use of climate resilient building materials			
	Use of materials that can be recycled at the end of their lifetime.			
	Use of modular construction techniques			
	Incorporate the necessary space to facilitate recycling, including glass, cans, cardboard, paper, plastics, aerosols, cartons and batteries.			
	Adopting community composting schemes.			
	Providing in-built compost heaps within the gardens of individual properties or shared amenity space			
	Disposing food waste via an on-site small-scale anaerobic digestion facility			
	Other (please state)			
Adaptable Buildings and External Space	Design to allow for changes in the health, lifestyle and mobility of the user, and technologies, such as use of electric vehicles.			
	External spaces to be flexible and adaptable over time; for example, to			

	provide for recreation or local food growing.			
	Provision of 20% of new housing in line with M4(2) – Policy HS5			
Chapter 5: Water interventions				
Managing Flood Risk	Direct development to areas with the lowest risk			
	Development does not increase the risk of flooding elsewhere			
	Use the latest climate change allowance for the time period in Flood Risk Assessments			
	Where development is appropriate in flood risk areas, incorporation of flood resilience and resistance measures within new buildings.			
	Adoption of land management practices to improve water infiltration into the soil			
	Use of permeable surfaces for roads, car parking areas, hard surfacing and pavements.			
	Other (please state):			
Sustainable Drainage Systems (SuDS)	Achieve greenfield run-off rates and manage surface water run-off as close to its source as possible, in line with the drainage hierarchy.			
	Use of blue roofs and rainwater harvesting including private and communal rainwater collection and reuse points/water butts.			

	Use of soakaways.			
	Use of landscape features - swales, wetlands, raingardens, green roofs / walls			
	Use of natural water courses (unless not appropriate).			
	Other (please state):			
Water Efficiency	Rainwater collection facilities such as communal rainwater tanks and water butts			
	Use of water efficiency measures in new developments to exceed Building Regulations (Part G) requirements (eg 110 l/person/day)			
	Meeting or exceeding the water consumption standards in BREEAM 'Very Good'.			
	Other (please state):			
Chapter 6: Biodiversity and Green Infrastructure				
Trees, Landscaping and Green Infrastructure	Integrate existing and new natural features			
	Green infrastructure in private outdoor space – e.g. trees, hedges, green/brown roofs, vertical climbers and landscaping.			
	Tree planting to provide shade to buildings in the summer.			
	Green/brown roofs and climbers			
	Provide food growing space within private gardens and communal growing spaces, such as community managed raised beds (See typical growing space areas in Table 1, Appendix B)			

Trees, Landscaping and Green Infrastructure	Green spaces within blocks, green verges and pocket parks			
	Restore old hedgerows and plant new formal hedgerows instead of fencing or walls			
	Sustainable management and maintenance of the green infrastructure			
	Provide a net gain in biodiversity, where possible			
	At least one of the following: bird/bat boxes/ amphibian kerbs/ hibernacula/hedgehog holes/ hedgehog homes/garden ponds.			
	Other (please state)			

Rossendale BOROUGH COUNCIL

Consultation Statement for

Climate Change SPD

October 2022

Regulation 12 of the Towns and Country Planning (Local Planning) (England) Regulations 2012 sets out that a consultation statement must be prepared prior to adoption by the Local Planning Authority. This should include:

(i) the persons the local planning authority consulted when preparing the supplementary planning document;

(ii) a summary of the main issues raised by those persons; and

(iii) how those issues have been addressed in the supplementary planning document.

Persons Consulted

The Draft SPD was taken to the Council's Overview and Scrutiny Committee for consideration and comment on 11 July 2022. Following this, the Forward Planning team used the Local Plan consultation database (which has in excess of 1,000 consultees) to email all consultees notifying them of the consultation and inviting comments.

The documents were available on-line on the Council's planning pages and the consultation was advertised on the Council's news page and social media platforms and a press release was also issued. An article appeared in the Lancashire Evening Telegraph) 20 July 2022) promoting the consultation. In addition to the Council's website, in accordance with Regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the documents were also made available for inspection during normal office hours at the Council's offices at Futures Park in Bacup.

As well as the individuals and groups who had asked to be kept informed of planning policy updates, the designated 'specific' and 'prescribed' consultation bodies were consulted too. These included the Environment Agency; Natural England, Historic

England, National Highways, Sport England. Lancashire County Council was also contacted as were adjoining authorities. As well as Rossendale residents and businesses, contact was also made with residents from outside Rossendale who have a keen interest in development matters within Rossendale.

The SPD was consulted on for 6-weeks from 13 July to 24 August 2022. Because this fell over the summer holidays it was considered best to extend the consultation period.

In total the Council received 21 responses plus the comments made by members of the Overview and Scrutiny Committee. Of these responses, 10 were submitted by residents, with a one response submitted by a resident from adjoining authorities, and one from a town councillor. A planning agent submitted two responses on behalf of two housing developers – Taylor Wimpey and Rowland Homes. The remaining responses came from statutory consultees listed below:

- National Highways
- Sport England
- United Utilities
- Natural England
- Lancashire County Council
- Two consultees responded with no comments to make: the Coal Authority and Homes England.

Summary of the Main Issues

Key themes raised included:

- concerns over the number, location and efficiency of on-shore wind turbines,
- acknowledgement of the importance of peat moorlands to provide multi-benefits such as carbon storage, recreational use and visual amenity,
- the ability of well-designed Sustainable Drainage Systems (SuDS) to create developments that can adapt well to climate change (eg reduce flood risk) and mitigate carbon emissions (eg tree planting, green roofs and walls).
- the importance of Active Travel not only to reduce carbon emissions but to enhance health and well-being
- more use to be made of renewable energy and EV charging points in new housing and by the Council
- concerns were raised regarding requiring a percentage of renewable schemes to be provided on major development sites in terms of viability.

Some of the issues raised were outside the remit of this SPD, such as United Utility's request for optional water efficiency standards or changes to Local Plan policy in respect of wind farms, which were raised bny a number of residents. These are matters for the Local Plan.

Addressing these Issues

The table at the end of this document (Appendix A) summarises each representation received, by whom and explains how these issues are being addressed in the final version. All the original comments can be viewed at https://www.rossendale.gov.uk/downloads/file/17729/climate_change_spd_-_combined_responses.

The key changes made to the document as a result of the comments received include:

- addition of reference to active travel and key documents such as Gear Change, Uniting the Movement and Active Design Guide (p7)
- strengthening wording around improving links from new developments to cycleways (p9)
- insert wording about public transport (p11)
- more references added about the LLFA and its pre-app service, the 4 pillars of SuDS and inserting the SuDS proforma as an appendix (p18, 19, 21, 22 and Appendix D.
- adding the role of peat in storing carbon, supporting rare wildlife and water regulation (p24)
- more examples of how biodiversity and green infrastructure can be improved (p28)
- a new section added for monitoring (chapter 7), linking with indicators already set in the adopted Local Plan and monitored annually through the Authority Monitoring Report.

Appendix A

Actions taken to Address Issues Raised

Ref No and Name	Key Issues Raised (Officer Interpretation of Comments)	Actions
1 National Highways	• General support, no aspects to challenge • Demand for road transport will continue & developments should promote modal shift whilst minimising the need to travel. • LP may need to consider policies to enable infrastructure associated with 0 carbon monitoring in the future. • Where development may affect drainage infrastructure near a strategic road network it needs to be demonstrated that surface water run-off can be accommodated within the design capacity of any culverts affected	• Add sentence on p18 to fourth bullet point: Development proposals are required to manage surface water using the drainage hierarchy in Figure 7. Applicants wishing to discharge surface water into a public sewer will need to submit evidence demonstrating why alternative options are not possible. Where development may affect use of drainage infrastructure that crosses under the strategic road network that National Highways operate, applications should demonstrate that surface water runoff from sites can be accommodated within the design capacity of any culvert(s) affected.
2 Peter Brown	Not enough accommodation for disabled provision in the SPD.	Comments are noted but not specifically applicable to the Climate Change SPD. An Equality Impact Assessment accompanies the Report to Cabinet
3 Edith Freeman	Comprehensive, and useful for people involved in the planning process.	No action needed
4 Gill Rothwell	Objects to the Grane Village application due to wildlife impact, flood risk and climate change	All allocations were assessed during the Local Plan examination. Not applicable to the Climate Change SPD.
5 David Cooper	• Investing in green projects is not a good use of money. • small particles come from other sources than diesel engines, including electric vehicles - road sweepers with dampers may help this problem, • household support fund is a good idea, • wind turbines do not provide a consistent energy supply, • wood burning stoves should be restricted because of pm2.5 particles and NO2 gas	Comments noted, no proposed changes.

6 Gary Cunliffe	• All new housing stock should be equipped with renewable sources of energy, power storage battery and EV charging points. • Ensure cycling routes are separated from the main road and press on with the trailhead centre at Lee Quarry. • Proposals for new cycling routes on the east of the valley and near schools, linking to the other end of the Valley. • Increase frequency of bus service (especially 464) in the mornings at schools' time. • Improve Council's actions eg turning lights off, switching to EV and using solar panels and power storage battery.	Section 3 - Adding a paragraph about public transport on page 11: Public transport The Local Plan supports the use of sustainable transport solutions including public transport. When recommended by Lancashire County Council, planning contributions will be sought to improve bus services such as improving bus shelters. Other points noted.
7 John Newcombe	• There should be no future extension to Scout Moor wind farm. • There are costs implication of a net zero policy to households (£2000/year). • Moors are important for recreational use. • Peat is important for carbon storage and must remain undisturbed. • Reasons for refusal of the extension of the wind farm in Rossendale by Secretary of State still apply today.	Section 6 - Page 27, 6 bullet point: Measures that provide multi-benefits in terms of biodiversity gain, flood risk resilience, carbon storage, provision of shade will be encouraged. For example, actions to restore moorlands will ~~also~~ be supported in order to increase biodiversity, improve carbon storage, slow the flow of water downstream, improve water quality and reduce erosion. Moorlands also provide recreational opportunities and visual amenity to local communities.
8 Chris Woods	• Blanket bog and peat should not be disturbed by developments such as wind turbines and the habitat should be restored. • No new wind turbines should be built in Rossendale and restoration schemes should be put in place to restore blanket bog. • Comments raised at the 2019 hearing also apply.	• Restoration of moorlands is included in the Climate Change SPD Section 6 (page 27). • Renewable energy projects are supported by the Council subject to Policy ENV7 and other policies in the Local Plan (eg Landscape Policy ENV3). The Local Plan was adopted in December 2021.

9 Cllr Kim Olaolu	• All new builds should have wildlife friendly fencing or preferably mixed hedgerows which have multiple benefits. • Native tree planting should be used to assist with climate change. • Healey Dell nature reserve should be preserved and issues relative to fly-tipping and anti-social behaviour being dealt with. • Trees should be protected especially those with nesting birds. • Policies have not been translated into actions. • Countryside and green spaces are important too for combatting climate change.	• Section 6 - page 27, third bullet point: The Council will encourage measures to manage land more effectively to increase biodiversity and new development proposals must deliver a biodiversity net gain, with demonstration possible via the latest Defra Biodiversity Metric tool. <u>In addition, wildlife friendly fencing (eg Hedgehog Highways) and native species mixed hedgerows will be supported whenever possible.</u> • Section 6 - page 27, fourth bullet point: Greening measures such as planting new <u>native</u> tree~~s~~ <u>species</u> and creating green roofs or green walls will also be supported as it can contribute to the storage of carbon, a reduction of the urban 'heat island' effect as well as reducing airborne pollutants. • The fly-tipping and anti-social behaviour at Healey Dell cannot be dealt with as part of the Climate Change SPD. The protection of trees is set out in conditions accompanying the grant of planning permissions and enforcement actions can be undertaken following the receipt of complaints. • The Council will be producing an SPD on Biodiversity
10 Bev and Geoff Rigby	• There should be no future extension to Scout Moor wind farm. There are costs implication of a net zero policy to households (£2000/year). Moors are important for recreational use. Peat is important for carbon capture and must remain undisturbed. Reasons for refusal of the extension of the wind farm in Rossendale by Secretary of State still apply today. Rossendale is privileged to have areas of peat and should work with partners to develop a programme to protect the moorlands.	• Section 6 - Page 27, 6 bullet point: Measures that provide multi-benefits in terms of biodiversity gain, flood risk resilience, carbon storage, provision of shade will be encouraged. For example, actions to restore moorlands will ~~also~~ be supported in order to increase biodiversity, <u>improve carbon storage,</u> slow the flow of water downstream, improve water quality and reduce erosion. <u>Moorlands also provide recreational opportunities and visual amenity to local communities.</u>

11 Anne Marie McKown	• Building more turbines will not achieve a reduction in greenhouse gases and slow down climate change • Are large battery networks planned to compensate fluctuation of energy from wind turbines and solar panels? • More renewable energy will lead to more reliance on other sources of energy. • The grid infrastructure should be improved before building new wind turbines to avoid turbines being turned off. • Financial aspects of de-commissioning of wind turbines should be secured at planning application stage (eg Escrow account or decommissioning bond) to avoid Council's liability.	• Comments are noted. • Battery storage is likely to form part of the ancillary infrastructure of wind turbines which is dealt with the 14th bullet point of Policy ENV7 in the Local Plan. • The financial aspects of decommissioning wind turbines is set out in the explanation text of Policy ENV7 (paragraph 271 of the Local Plan).
12 Dr Falmai Youngman	• Object to new wind turbines at Scout Moor. • Planning Inspector's decision of Scout Moor Public Inquiry still applies now. • Peat deposits should be protected. Moorlands should be protected for their heritage, fauna and flora through AONB or SSSI status. • There has been enough wind energy development in Scout Moor. • Off-shore wind turbines are more efficient than on-shore wind turbine and wind power might be too strong at this altitude. • There is a strong community resistance to new wind turbines at Scout Moor.	Renewable energy projects are supported by the Council subject to Policy ENV7 and other policies in the adopted Local Plan (eg Landscape Policy ENV3)
13 Coal Authority	No specific comments.	No action needed

14 Dr Alan Heyworth	• Wind turbines should be avoided on deep peat, thin peat and areas which have or could have peat-forming vegetation. The policy instead of saying "avoiding areas of blanket bog and deep peat" should say "avoiding any activity likely to damage peat or to inhibit the expansion of peat cover". • No new turbines should be allowed on the moors. • Recycling cost of glass-reinforced turbines should be included in decommissioning cost. • Moorland should be protected for future generations.	The Policy ENV7 has recently gone through an Independent Examination and been adopted in December 2021 by the Council. The policy can be amended in the future as part of a Local Plan review.

15 Sport England	• Suggest to strengthen the objective of section 3 to include 'Active Travel' eg walking, cycling and running with reference to the government agency ' Active Travel England' and to Sport England's 'Uniting the Movement' Strategy 2021. • Also reference to TCPA's 20-minute neighbourhood and Sport England's 'Active Design' guidance would be helpful to highlight the 10 principles to achieve an Active Environment. • Welcomes that green infrastructure is included as a means to mitigate climate change. Any proposals to increase cycling/ walking links or biodiversity on playing fields should be discussed with Sport England. There should be no loss of functional playing field and no impact on pitch provision. Council's Playing Pitch and Outdoor Sport Strategy (2021) can help inform appropriate climate change mitigation proposals affecting playing fields.	• Section 3 - at the end of the second paragraph: Given the Net-Zero target and the fact that UK transport emissions have not decreased since the 1990s, developments must encourage greener and more active transport alternatives. Active travel is championed by the Government agency 'Active Travel England' which objective is "for 50% of trips in England's towns and cities to be walked, wheeled or cycled by 2030". Linked to this is the policy paper 'Gear Change – A bold vision for cycling and walking' which sets out the Government's vision to deliver actions to encourage cycling and walking. Active travel also has health and well-being benefits as highlighted by Sport England's 'Uniting the Movement' strategy. Sport England have produced an Active Design guide including 10 planning principles to increase active lifestyle in towns, neighbourhoods, streets and open spaces. • Insert footnotes: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf; https://www.sportengland.org/about-us/uniting-movement ; https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design#the10principlesofactivedesign-5656 • Add footnote on page 8: Encouraging 'liveable neighbourhoods' (see Figure 1), where services are close and the need to use the car is reduced, will bring a variety of benefits, including cleaner air, healthier communities, and better resilience to climate change. Footnote: TCPA(2021) 20-minute neighbourhood: https://tcpa.org.uk/resources/the-20-minute-neighbourhood/

16 Arup (on behalf of United Utilities)	• Pre-response: Advise to direct developers to use UU free pre-application service. • No development will normally be permitted over or in close proximity to UU asset. • Consideration of UU assets to be undertaken at masterplanning stage including consideration of landscaping proposals in the vicinity of the assets and any changes in level. • Response: Suggest following amendment in 'Energy Efficiency and Renewables' section: "Development proposals on land used for public water supply catchment purposes will be required to consult with the relevant water undertaker. The first preference will be for proposals to be located away from land used for public water supply purposes. Where proposals are located on catchment land used for public water supply, careful consideration should be given to the location of the proposed development and a risk assessment of the impact on public water supply may be required with the identification and implementation of any required mitigation measures." • Request amendment in the Water section including adding definition of flood risk from PPG, highlighting risk of flooding from sewers and importance of consulting with sewerage undertaker; development should not displace surface water flood risk in particular to existing properties or highway; • reference to 4 pillars of SuDS; surface water hierarchy should have water re-use as priority; optional water efficiency standard of 110 litres per day per person; non domestic building to achieve BREEAM rating of Excellent; new wordings for multi-functional SuDS. Sewerage network in Rossendale dominated by combined sewers, any proposal to reduce surface water entering the sewer network is welcomed to reduce flood risk form sewers. Request further details to be provided about water quality (referenced in policy ENV9) especially for proposals in	• Add text to signpost to UU's free pre-app service and relevant documents. • It is not appropriate to show details of water supply catchment land as this does not specifically relate to the purpose of this SPD, albeit it should be considered as a constraint on development in determining planning applications. • The LPA will encourage applicants to consult with UU at pre-app stage, and UU will be consulted on a planning application. • Much of the SUDs data has been added - eg from LLFA comments, and we will add risk of flooding from sewers - see LLFA comments below. • We cannot add optional standards for water efficiency as this has not been considered through LP examination. Look to reference with opportunities for surface water management such as bio-retention tree pits and landscaping with SUDS - this is discussed in an example. Discussion with UU re. BNG to take place later this year. • Greening measures such as planting new native tree species (including new tree-lined streets) and creating green roofs or green walls will also be supported as it can contribute to the storage of carbon, a reduction of the urban 'heat island' effect as well as reducing airborne pollutants.

	groundwater source protection zones about risk assessment, masterplanning and construction management plan. • Biodiversity: BNG should not constrained infrastructure to respond to future growth so better to provide BNG off-site. Currently evaluating land ownership for BNG and would welcome discussion with LPA. Request that tree-lining streets requirement form NPPF is referenced in SPD with opportunities for surface water management such as bio-retention tree pits and landscaping.	
17 Natural England	Concerned at the lack of reference to peat deposits. Want to see greater consideration given to the importance of Rossendale's peat deposits in relation to carbon storage. Would welcome further discussion.	These include threatened, rare and sensitive habitats such as hedgerows, acidic grassland, native species broadleaved woodland, blanket bogs etc. <u>In particular, the Borough comprises large areas of moorlands including peat deposits that play an important role in relation to carbon storage.</u>
18 Lancashire County Council	SuDS can and should contribute to the green infrastructure of an active transport network (eg swales) or traffic calming measures or low-traffic neighbourhoods (eg rain gardens, SuDS trees)	

	• Need more robust links between local plan policies and SuDS pro-forma. • Would be useful to provide links to relevant flood risk maps in footnotes for bullet point 3 on page 18 and correct typo about LLFA. • Bullet point 4: link should be made to SuDS pro-forma that sets out evidence required to meet drainage hierarchy. • Bullet point 5: makes it appear SuDS not expected at detailed design stage which would be contrary to NPPF. LLFA expects sites to be designed with a "drainage first" approach as per SuDS manual, does RBC also expect this? • Should natural and artificial drainage features be mapped to be protected and integrated with SuDS and wider green infrastructure? • Natural features can also help meet Biodiversity Net gain targets and LLFA advise that site layout should be designed around these features. • Suggests the addition of the following to paragraph 1 on p19: "Policies, guidances and standard for managing surface water flood risk and the design of SuDS, or nay future replacements of the following, must be complied with when designing for and managing surface water: SuDS Pro-Forma and associated guidance; NPPF; PPG; The SuDS Manual (C753), Defra Technical Standard for Sustainable Drainage Systems; The LLFA Planning Advice." • Bullet point 2 p19: replace by "All applicants are advised to access the LLFA Planning Advice Service for technical advice on surface water and SuDS." • Provide specification on how development should not increase the risk of flooding elsewhere especially in relation to not displacing surface water flood risk. • Paragraph 1 p21 how SuDS will manage pollution for urban runoff? Should they provide an appropriate treatment train as per the SuDS Manual and Pro-Forma? A link to BNG could be added there. • Provide examples of the multi-functionality and multiple benefits of	• Page 18: The footnote 34 on flood risk maps has been provided before in the first paragraph. • Page 18, third bullet point: Proposals should include the most up-to-date Flood Risk available from the Environment Agency, the Strategic Flood Risk Assessment, the Lead Local Flood ~~Risk~~ Authority and the sewage undertaker. • Page 18, modify fourth bullet point: Development proposals are required to manage surface water using the drainage hierarchy in Figure 7. Applicants wishing to discharge surface water into a public sewer will need to submit evidence demonstrating why alternative options are not possible. Please refer to SuDS Pro-Forma in Appendix D. • Page 18, fifth bullet point: In ~~early~~ all design phases, applicants will have to incorporate sustainable drainage systems and consider surface water management. • Page 19: New developments shall incorporate appropriate Sustainable Drainage Systems (SuDs) in accordance with National Planning Policy Framework, Planning Practice Guidance, National Standards for Sustainable Drainage Systems (footnote 38), the SuDS Manual (C753), the SuDS Pro-forma (see Appendix D) and the LLFA Planning Advice. • Modify second bullet point on p19: Use should be made of the EA's pre-application planning service (footnote 40) and the Lancashire LLFA Planning Advice Service(footnote 41). ~~Future planning advice on surface water by the LLFA is also expected this summer and should be considered before the submission of a planning application.~~ • Page 20, first bullet point: As stated, preference should be to develop in lower risk areas (eg flood zone 1 and areas identified as at very low risk of surface water flooding 42). Please note that risks may increase with climate change. Where unavoidable, development should be safe through its lifetime and not increase risk elsewhere (including displacing surface water flood risk). • Page 21, first paragraph: SuDS are designed to both manage the flood and pollution risks resulting from urban runoff, reducing pressure on the sewerage network, and to contribute wherever possible to environmental enhancement and place making. With this in mind, the multi functionality and multiple benefits of SuDS must always be considered 48 including their important for amenity and biodiversity.

	SuDS (Susdrain). What are the exceptional circumstances a heavily contaminated site)? • Rephrase the second paragraph of p21 as LLFA should be taken into consideration when designing SuDS. • Part of Policy ENV9 relating to greenfield rate runoff should be expanded on in SPD. • Provide reference to The Foold Hub which is specific to the North West.	• Page 21, second paragraph: .Lastly, ~~Lancashire County Council as~~ the Lead Local Flood Authority recommendations given via the~~offers a surface water~~ planning advice service should be followed in terms of surface water management.
	• Stronger links with SuDS and surface water management should be made. • Green-blue infrastructure should be considered rather than just green infrastructure. • Bullet 3 p26 - no development shall occur within 8m of any ordinary watercourses culverting of watercourses should be avoided to ensure access for maintenance and reduce residual risk to adjacent properties. This buffer could be used to expend clough woodland and provide GI and water quality improvements, habitat creation, amenity.	• The term Green Infrastructure is the same as the definition in the Glossary of the NPPF https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary. • The wording shall be amended to suggest that the buffer could be planted accordingly eg native trees etc. Add p28 <u>The 8m buffer could be planted using native tree species to enhance amenity, biodiversity and improve water quality.</u>

	• SuDS Pro-Forma should be updated to meet local requirements eg multifunctional SuDS. • Better as separate appendix in order to update it more easily. • Pro-Forma should be added to validation checklist.	SUDs proforma added to Appendix. It will be added to Validation Checklist too, when it is next updated, which is expected in the near future.
19 Pegasus (on behalf of Taylor Wimpey)	• Welcome the Council's proactive stance. • Refer to Taylor Wimpey's interests in the housing allocations at Edenfield and Grane Village. • Recognise the scale of the environmental crisis and published an Environment Strategy in 2021, looking at climate change, nature, and resources and waste • Concerned that there are prescriptive requirements over and above current adopted Local Plan policy: o 10% on site renewable on all schemes above 10 dwellings and o requiring minimum of equivalent Code for Sustainable Homes level 4 / 19% improvement on dwelling emission rate over the target emission. These are above requirement in local plan policies and have not been tested during the Local Plan Examination. Some requirements will also be superseded by changes to Building Regulations. • Clarification needed on whether the checklist in appendix C will become an application validation requirement or will it be dealt as a condition. • Also clarification is needed as to whether schemes should demonstrate full compliance with checklist points or a demonstration on how the applicant has sought to meet them. • Criteria above local plan policies should be removed if full compliance is requested. • Also will Pro-Forma become requirement in validation checklist? Several requirements related to detailed design which might only become available later through the course of the application determination process or via condition.	• The Council considers that this requirement accords with the NPPF, the Local Plan objectives and the aspirations of the Council to reduce greenhouse gas emissions. • The Checklist is intended as a guide for developers to show how they've addressed these issues. It may be that questions are raised about why they haven't addressed certain items during determination of the planning application. • The Council will be updating its Validation Policy which will address issues such as surface water flooding from the LLFA's concerns. A statement setting out how the design will be adaptable to climate change will be required at validation stage (policy ENV1(q)).

20
 	
Pegasus (on behalf of Rowland Homes)
	• Welcome the Council's proactive stance.
	• Refer to Rowland Homes' interests in the housing allocations at Edenfield and Grane Village
	• Concerned that there are prescriptive requirements over and above current adopted Local Plan policy:
	  ○ 10% on site renewable on all schemes above 10 dwellings and
	  ○ requiring minimum of equivalent Code for Sustainable Homes level 4 / 19% improvement on dwelling emission rate over the target emission.
	These are above requirement in local plan policies and have not been tested during the Local Plan Examination. Some requirements will also be superseded by changes to Building Regulations.
	
	• Clarification needed on whether the checklist in appendix C will become an application validation requirement or will it be dealt as a condition.
	• Also clarification is needed as to whether schemes should demonstrate full compliance with checklist points or a demonstration on how the applicant has sought to meet them.
	• Criteria above local plan policies should be removed if full compliance is requested.
	• Also will Pro-Forma become requirement in validation checklist? Several requirements related to detailed design which might only become available later through the course of the application determination process or via condition.
		see above

21 Homes England	No comment	No action needed

RBC Overview & Scrutiny Cmtee	• Use of stronger language to require measures be undertaken. • The Council would be guided by LCC in relation to cycling plans and would work to identify where connections were needed. These would be recorded as formal comments on the SPD. • Rewording road safety figure, from footnote 12 – to be recorded as a formal comment.	Where appropriate the wording has been strengthened. "will be important that cycleways and walkways integrate with the pre-existing local routes, rather than the traditional cul-de-sacs and winding roads" (see Figure 2). Improving the links from new developments to existing and proposed cycleways need to be considered by developers to encourage more cycling. This will result in areas that would naturally calm traffic and create more visibility for residents. The latter is particularly important, given that 24% of people do not cycle due to road safety concerns and a further 16% note there is too much traffic or it is too fast17.

DRAFT ADOPTION STATEMENT

SUPPLEMENTARY PLANNING DOCUMENT

CLIMATE CHANGE

Notice is hereby given under Regulation 11 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) that Rossendale Borough Council has formally adopted the Supplementary Planning Document on the subject of "Climate Change" on [insert date].

The SPD has been modified since its original draft to take into account comments received during a 6 week public consultation undertaken between 13 July and 24 August 2022.

According to Regulation 11, "any person with sufficient interest in the decision to adopt the supplementary planning document may apply to the High Court for permission to apply for judicial review of that decision". Also, "any such application must be made promptly and in any event not later than 3 months after the date on which the supplementary documents was adopted".

The Climate Change SPD and Consultation Statement can be viewed on the Council's website at [insert webpage]. In addition a hard copy can be made available to view at the One Stop Shop at The Business Centre, Futures Park, Bacup, OL13 0BB during opening hours.

Should you have any queries about this Adoption Statement, the Consultation Statement or the Climate Change Supplementary Planning Document please contact:

Forward Planning Team
The Business Centre
Futures Park
Bacup
OL13 0BB

Tel: 01706 252418 / 2415 / 2412
Email: forwardplanning@rossendalebc.gov.uk

EQUALITY IMPACT ASSESMENT

The council carry out Equality Impact Assessments (EIA) to analyse the effects of our decisions, policies or practices.

Throughout this document, policy refers to any policy, strategy, project, procedure, function, decision or delivery or service.

The EIA should be undertaken/started at the beginning of the policy development process before any decisions are made.

Policies are developed and reviewed using a consultative approach involving relevant internal and external stakeholders. Officers must consider what action needs to be taken to help overcome or minimise any disadvantages that people who share a protected characteristic will experience in compliance with the Equality Act 2010.

Name of policy:	Climate Change Supplementary Planning Document
Lead officer name	Anne Storah
Job title	Principal Planner
Service area	Planning
Telephone contact	01706 252418
Email contact	annestorah@rossendalebc.gov.uk
Date Assessment commenced	02/11/2022
Date assessment completed	**02/11/2022**

The main aims/objectives of this policy are:

The Rossendale Local Plan 2019 to 2036 makes several references to Climate Change and the need to prepare a Supplementary Planning Document (SPD) to provide further guidance. The Climate Change Supplementary Planning Document, once adopted, will be a material consideration in the determination of planning applications in Rossendale.

The document discusses actions relating to the following four principles:

- Reducing the dominance of fossil-fuelled vehicles via encouraging sustainable and more active transport
- Improving energy efficiency and promoting renewables in the Borough
- Water interventions
- Biodiversity and Green Infrastructure

It is expected that this SPD will be a live document, to be updated and expanded as appropriate.

Indicate the status of the policy or decision

New/proposed ☒ Modified/adapted ☐ Existing ☐

Indicate protected characteristics have been assessed

Age	☐	Disability	☐	Gender reassignment	☐
Religion/belief	☐	Sexual orientation	☐	Sex	☐
Pregnancy/maternity	☐	Race	☐	Marriage or civil partnership	☐

1. State any positive or negative impact on the protected characteristic(s) (added additional rows if needed)

Protected characteristic	Positive/Negative	How does it impact?
Age	Mainly positive	The aim to encourage active form of travel is likely to be beneficial for the health and well-being of different age groups in the community including older and younger people as well as children. Some people might find it difficult to engage in walking or cycling - the opportunity to use a private car will still be available. The improvement of the green infrastructure and biodiversity is likely to have additional positive benefits for all age groups in the Borough, providing opportunities for recreation. The older and younger generations are thought to be most vulnerable to the effect of climate change (eg more extreme weather events, such as heatwaves) and therefore policies to mitigate further climate change such as encouraging renewable energy will be beneficial while other policies such as water interventions (especially sustainable drainage) can help adapt to climate change effects such as flooding.
Disability (Physical/learning/mental health)	Mainly positive	People with physical disabilities might find it more difficult to engage in active forms of travel. While the policy encourages active travel, the use of a private car is available. Studies have linked the quality of the environment with health benefits including mental health. Therefore the enhancement of the Borough's green infrastructure and biodiversity is likely to be beneficial to the health of the community.
Gender Reassignment		No specific implications
Pregnancy and Maternity		No specific implications
Race (Ethnicity or Nationality)		No specific implications

Belief or Religion		No specific implications
Sex		No specific implications
Sexual Orientation		No specific implications
Marriage and Civil Partnership		No specific implications
Contribution to equality of opportunity		No specific implications
Contribution to fostering good relations between different groups (people getting on well together – valuing one another, respect and understanding)		Policies to encourage sustainable and active forms of travel as well as providing better green infrastructure are likely to encourage social interactions between residents and improve community cohesion.

2. Explain and give examples of any evidence/data used (add additional rows if needed)

Evidence	**How does this have an impact on the protected characteristic?**
Cities, green infrastructure and health – A paper for the Foresight Future of Cities project – Landscape Institute (2015) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/443322/future-cities-green-infrastructure-health.pdf	The policy on enhancing the green infrastructure in the Borough aimed at mitigating and adapting to climate change is likely to have additional benefits for the

	mental health of residents.
Heatwave: how to cope in hot weather, NHS (2022) Heatwave: how to cope in hot weather - NHS (www.nhs.uk)	Older people, people with mental health conditions, babies and the very young are included in the list of people most at risk in hot weather

3. Outcome of EIA

What course of action does this EIA suggest you take?	Please indicate
Outcome 1- The EIA has not identified any potential for negative impact on the protected characteristics. Progress to **EIA approval – section 5**	☒
Outcome 2- The EIA has identified a possibility for negative impact on the protected characteristics. **An EIA Action Plan must be completed to mitigate the negative impact – section 4 before approval section 5**	☐

4. EIA action plan

Based on the above impact assessment, findings/evidence and outcomes identified, please complete the Action Plan below. The action plan should address:

- Any gaps in findings/evidence research including any consultation or engagement regarding the policy and its actual/potential impacts
- How you will address any gaps
- What practical changes/action that will help reduce any negative impacts identified
- What practical changes/action that will help enhance any positive contributions to equality

Negative impact identified	Action required	Lead officer	To be completed

Monitoring and reviewing the effect of the policy Please state how you will monitor the impact and effect of this policy
N/A

5. EIA approval (to be completed by the relevant Head of Service/Director)

- Outcome of EIA agreed/approved by Management Team: (date)

- Published on council website: (date)

Signed: …… (Head of Service/Director) (date)