

RESPONSES TO CONSULTATION ON ENVIRONMENTAL STRATEGY

Six responses were received during the consultation period. None of these disagreed with the overall structure so that has been used for setting out the feedback and responses.

Responses were received from the following people/organisations. The abbreviation shown has been used in the following table showing the issues, the comments and the Council's responses. The responses have generally been paraphrased for the sake of brevity although the full responses are available if needed.

CES

Groundwork = GW

P Megson, Lancashire County Council=PM

Sarah Whitney, Lancashire County Council=SW

Keith Bell, Building Control Manager, Rossendale Borough Council=KB

John Eatock, Chairman, Rossendale Climate Change Group=JE

Issue	Comment	Response
Introduction and Purpose of Strategy	<ol style="list-style-type: none"> 1. GW – The Council will need to ensure that this (the environmental strategy is woven into other Council policies and procedures. 	<ol style="list-style-type: none"> 1. If adopted by the Council, it will become Council policy and will need to be able to influence other policies. The means by which this would be done are to be developed. This reference has been included in the 4th paragraph of the Introduction.
Background to Rossendale	<ol style="list-style-type: none"> 1. GW – Good, possible to include more information on health inequality data. 2. SW – Reference should be made to the Lancashire Environment Strategy in addition to Ambition Lancashire 	<ol style="list-style-type: none"> 1. The results of the East Lancashire Health Survey have just been published and more information can be added from the Health Profile recently obtained into para 2.5.. 2. Reference included in Introduction.

Vision and Aims	No comments received.	
Aim One – Climate Change and Energy	<ol style="list-style-type: none"> 1. GW – Feeling that we should take a stronger stance on the causes of global warming. The Hadley Report was out of date 2. GW – Aiming to increase the amount of renewable energy we produce does not go far enough – instead we should be aiming to be carbon neutral 3. PM – how does action to reduce fuel poverty control greenhouse gases 4. PM – there is no mention of the potential for small or micro-scale hydro-energy generation using the valley’s waterpower. 5. PM – Failure to recognise the significance of the Borough’s areas of blanket bog, a UK BAP priority habitat. 6. SW - No mention is made to the effect land-use has on climate change 7. SW – An additional objective could include increasing or maintaining the cover of carbon sinks. 8. SW – Need to include adaptation for the predicted changes in climate. 9. KB – include reference to the contribution that Building regulations make to the improvement to thermal efficiency of new and altered buildings 	<ol style="list-style-type: none"> 1. The Intergovernmental Panel on Climate Change reported on 2nd February and confirmed that they were 90% satisfied that the cause was the activity of mankind. A quote form the IPCC report will be included in paragraph 4.1. 2. This is considered to be unrealistic at this stage, in relation to the Council or the whole of Rossendale. We need a better understanding of the baseline before we can determine how far we can improve in the future. A new Vision should be agreed by 2020. 3. The aim is to improve energy efficiency and insulation of properties occupied by people in fuel poverty. 4. Paragraph 4.1. will be altered to add such a reference. 5. New paragraph 2.8 to be added to acknowledge that the Borough already has numerous attributes which are environmentally significant. Efforts to protect the blanket bog would be included in the Action plan. 6. Add 4th paragraph to 12.1 ‘Changes in land-use would have a range of influences on the environment and these would need to be understood’. 7. This would need to be investigated to examine the feasibility first.

		<ul style="list-style-type: none"> 8. Effects will become evident in a number of ways that affect several aims. Add new objective 4.2.6 'To understand and, where possible, mitigate the effects of climate change. 9. Amend Service provider section in paragraph 4.1.
Aim Two – Waste and natural resources	<ul style="list-style-type: none"> 1. GW – Recycle section does not make sense 2. GW – Dispose – remember there are no landfill sites left in Rossendale 3. GW – Objectives – Should the Council not be committing to the procurement of recycled products etc 4. PM – This aim does not directly address industrial consumption and waste. 	<ul style="list-style-type: none"> 1. Paragraph has been rewritten. 2. Noted 3. Paragraph 5.2.4 will be altered by adding reference to aim of the procurement of recycled products and materials. 4. The strategy is intended to cover all waste.
Aim Three – Street Scene	<ul style="list-style-type: none"> 1. GW – name of report concerning cleaner/greener environment needed 2. GW – Link needed to open space/play/parks development strategies 3. GW – Objectives – need to mention education 4. PM – These aims seem to be primarily focussed on litter clearance/fly tipping. 5. PM – Paragraph 6.2.3 makes little sense in the context of the rest of the information provided for Street Scene. What about spaces that are visually unsightly regardless of the presence of litter. 	<ul style="list-style-type: none"> 1. Reference to Local Government Association campaign to be included 2. Reference to be included. 3. This is referred to in the cross cutting Awareness and Education aim 4. This strategy is meant to be about the cleanliness of the environment and visual amenity and the emphasis is intentional. 5. The visual amenity of land and buildings which might be derelict or contaminated is dealt with under Aim Seven.
Aim Four – Sustainable transport	<ul style="list-style-type: none"> 1. GW – Under objective 7.2.2 the word 'contain' is not appropriate – we should aim to 'reduce'. 	<ul style="list-style-type: none"> 1. Agreed – the word will be changed. 2. Agreed. Add new objective 7.2.4 'To reduce the need to travel other than by

	<ol style="list-style-type: none"> 2. SW – Should add another objective to reduce the need to travel (better provision of local services, encouraging home-working etc). 	environmentally friendly means’.
Aim Five – Air and Noise pollution	No comments received	
Aim Six – Sustainable water environment	<ol style="list-style-type: none"> 1. CES – Do something to stop pollution in rivers - concentrate on the cause and not the effects. 2. GW – 4th paragraph– ‘form’ should be ‘from’ 3. GW – Consideration should be given to the lack of upkeep of current drainage systems. Environment Agency not mentioned as they also have a regulatory role. 	<ol style="list-style-type: none"> 1. Change paragraph 9.2.2 – insert ‘protect and’ before ‘improve’. 2. Noted 3. Add objective 9.2.4 – ‘To ensure the effective operation of foul and surface water drainage systems including the effective drainage of land’. Individual agencies have not yet been identified but will be during implementation stage.
Aim Seven – Sustainable use of land	<ol style="list-style-type: none"> 1. PM – whilst development on brownfield sites is briefly discussed, the conversion and re-use of existing buildings and structures is not mentioned. 2. PM – no objectives in relation to contaminated land 	<ol style="list-style-type: none"> 1. Alter objective 10.2.3 by adding ‘bring under-used derelict sites and structures back into use where practicable’ 2. Add new Objective 10.2.4
Aim Eight – Countryside, green spaces and biodiversity	<ol style="list-style-type: none"> 1. CES – Make sure the plan has restoration plans for biodiversity. 2. CES – Stop the use of monoculture planting schemes to help improve the urban environment and stimulate the local economy. 3. GW – link to Open space/play strategy/parks development strategy needed and reference to rights of way. 	<ol style="list-style-type: none"> 1. This was a suggestion for an Action that will be brought forward for that stage. 2. Action to improve the urban environment through more varied planting schemes will be taken forward as a potential Action under 11.2.1 3. Wording to be added referring to links in objective 11.2.1, 11.2.2. and 11.2.3. 4. Agreed – reference to green infrastructure

	<ol style="list-style-type: none"> 4. PM – there appears to be confusion between Green Infrastructure and Biodiversity. 5. PM – Need to recognise the wildlife sites in Rossendale whether statutory SSSIs or others. 6. PM – insufficient reference to loss, conservation, management and restoration of landscape character in the strategy 	<p>is better.</p> <ol style="list-style-type: none"> 5. Agreed – reference will be added 6. Agreed – a reference will be added recognising the significance of the Council’s Local plan
Aim Nine – Awareness and education	<ol style="list-style-type: none"> 1. CES – include a range of environmental interpretation to allow support and participation from the public 	<ol style="list-style-type: none"> 1. Add objective 12.2.3 – ‘To be a source of information about the links between pollution and wildlife’.
Implementation, monitoring and review	<ol style="list-style-type: none"> 1. CES – Don’t rely on one organisation for the work but spread work between local experts 2. GW – How will the action plans be developed and who will lead on their production and monitoring 3. GW – Will they be built into LSP Theme Group Action Plans 4. GW – Each Aim and associated target would need a committed individual to drive it forward 5. GW – what resources are Rossendale Borough Council able to commit to drive forward the strategy. 6. GW – Will Action Plans be associated with this strategy or through the LSP? Perhaps more use of the words ‘act local think global’. 7. GW – Important to know what the 	<ol style="list-style-type: none"> 1. Implementation will involve a range of local companies, organisations, groups and individuals. This was indicated in paragraph 13.1 but will be emphasised. The Council’s Procurement policy could encourage local suppliers. 2. These will be developed during the detailed consultations with various parties along with meaningful targets and a benchmark. 3. The Council’s Environmental Health service will lead on monitoring and reporting progress to the Council and the Local Strategic Partnership through the Environment Theme Group. The EH Service will be collecting evidence of performance, gaining commitment to action, looking for synergistic effects where people can work together and achieve

	<p>indicators are at this stage, comparable with other Authorities and with baseline figures</p> <ol style="list-style-type: none"> 8. PM – there is a need to develop Actions for the delivery of the strategy. 9. PM – reference is made to the use of indicators. It is suggested that the requirements of the Annual Monitoring Report would be usefully included. 10. PM – no reference to the review process 	<p>more than working separately.</p> <ol style="list-style-type: none"> 4. These will be identified during the first 6 months. 5. The Environmental Health Service will perform this task from within existing resources. Further details are shown in a new paragraph 13.4. 6. Actions for individual organisations will be included in their own plans and collected into an overall plan for monitoring purposes. They would only be included in the LSP Theme group plan where more than one organisation were working together on the Action. 7. See above. 8. See above. 9. This will be included in the implementation stage. 10. Reference will be included in new paragraph 13.5
General	<ol style="list-style-type: none"> 1. GW – concern expressed over presentation of the strategy. Could add pictures and colour to make the document look more professional and user friendly. 2. GW – There is a lack of targets and Action Plans 3. PM – the document doesn't set any action points, merely inspirational aims and objectives 4. PM – no reference to the landscape character of the Borough 	<ol style="list-style-type: none"> 1. First intention is to get the content right. Funds will be sought to enable the final document to be well presented. 2. Detail about targets will be clarified once a benchmark has been established. Action Plans will be developed in consultation with all relevant parties. 3. As above. This document is a strategy that should lead activity over several years. A baseline has yet to be developed, actions in each year will be committed and,

	<p>5. JE – the economic implications of climate change should be recognised and mentioned in respect of each aim</p>	<p>thereby, the aims and objectives achieved. We cannot be specific at this stage as possibilities will become more apparent as we collect information and gain commitment. It would be premature to include them all in the initial strategy, which, it is intended, will span activity over many years.</p> <p>4. A reference is included in paragraph 2.7. This will be expanded slightly.</p> <p>5. A reference to the Stern Report will be included and the economic implications referred to in paragraph 12.1.</p>
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