



The Wildlife Trust for Lancashire Manchester & North Merseyside



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Planning Department
Rossendale Borough Council
The Business Centre
Futures Park
Bacup
OL13 0BB

Dear Planning Officer

RE: 2025/0267 Construction and operation of 17 wind turbines with a maximum height to the tip of the blade of 180 metres (above ordnance datum), together with associated ancillary infrastructure comprising crane pads and hard standings; new access tracks; improvement and widening works to Scout Road; onsite substation; underground electrical infrastructure and cabling; fencing and boundary treatments; external lighting; drainage infrastructure; habitat and moorland restoration works; public right of way works; landscaping; temporary construction compound and staging area; underground electrical grid connection to the Rossendale Bulk Supply Point; and associated engineering works; alongside the retention of and improvements to existing access tracks associated with the existing Scout Moor Wind Farm.

Thank you for the opportunity to provide feedback on the above planning application. The Lancashire Wildlife Trust has had the opportunity to review the proposed development along with the compensation package proposed and feel that we must object to the application as it stands.

The Trust supports renewable green energy that will help us in the fight against climate change; however, it is important that the design and location of such development does not undermine important biodiversity assets that would also help to alleviate the damaging impacts of climate change. Our objections relate primarily to the loss of Annex 1 priority blanket bog habitat which can play an important role in mitigating climate change. We note the proposal to restore and rewet other areas of the moors as compensation and whilst we would welcome the restoration and enhancement of degraded areas of peat moorland within the area, we do not feel that this should come at the expense of the loss of existing priority habitat that could be managed to help mitigate the damaging effects of climate change.

In the Trust's response to the scoping opinion in January 2025, we expressed our concern that the development would allow peat of up to 1m in depth to be stripped away. Despite reassurances that all attempts would be made to avoid deep peat deposits, the proposed location of the turbines shows that all but two of the seventeen turbines would be located on deep peat and that some of the turbines would be situated on peat that is between two and three meters deep. This is a far worse scenario than originally proposed in the scoping opinion.

Our more detailed response is outlined below, but of great concern is that the location of the development is within an area of the moors that modelling has shown to have the greatest potential for future restoration.

Environmental Statement - Chapter 9: Ecology

Paragraph 9.8 indicates that the design of the development has evolved iteratively to minimise effects on peat habitats. However, we would call attention to a recent report – Blanket Peatland Prioritisation Under Projected Climate Change by Dr Joe Bellis (Liverpool John Moors University). The report was undertaken to support the Lancashire Wildlife Trust and other stakeholders in prioritising management actions by pinpointing areas most vulnerable to different climate change threats and those with the highest restoration potential. The study looked at three blanket bog areas: the Forest of Bowland, Rossendale Forest and the West Pennine Moors. The key findings of the report show that climate change presents significant challenges to the integrity of blanket bog within the study region, with the Rossendale Forest peat bogs predicted to face significant threats. The modelling identified that the bog habitat located within the proposed development is predicted to be the most resilient to the impact of climate change and therefore a priority for protection and restoration.

We are also concerned that, despite reassurances that deep peat would be avoided, the development plans show that all but two of the proposed turbines are located on deep peat deposits, which as outlined above support bog habitat identified as being amongst the most resilient to climate change in the area.

The ecology report and accompanying NVC surveys predict that there would be significant losses in blanket bog habitat with several NVC bog communities being adversely impacted, including M3 - *Eriophorum angustifolium* bog pool, M20 - *Eriophorum vaginatum* blanket and raised mire, M25a – *Molinia caerulea* – *Potentilla erecta* mire/*Erica tetralix* sub-community and M25b - *Molinia caerulea* – *Potentilla erecta* mire, *Anthoxanthum odoratum* sub-community. It should be noted that NatureScot identifies that impacts on M3 communities should be completely avoided. However, 0.63ha of this important habitat will be lost. Overall, 43.73ha of blanket bog communities are predicted to be lost, with 18.28ha being direct losses and a further 26.45ha from indirect loss. This represents a huge loss of blanket bog habitat, and likely an underestimate, as the current calculation does not include other NVC communities that may well occur over deep peats. It should be noted that Natural England now defines blanket bog as having a peat depth of 0.3m or over, although it also emphasises that blanket bog may occur on shallower peat., especially on the periphery of blanket bog masses. The definition of peat bog is based on depth and not surface vegetation alone. In calculating the impact on blanket bog habitat, this should include other vegetation types on peat soils. The conclusion from the surveys is that impact on blanket bog communities is considered to be major even with the potential under-estimation of the impact on bog habitat.

Regarding the evaluation of the habitats to be lost, all the mire habitats above are Annex 1 priority habitats that are capable of restoration. We would also consider that other habitat types on deep peat soils are also defined as degraded bog habitats, and this should be reflected in the value assigned to them. This has the potential to alter the magnitude of impact, which we do not feel to be minor.

Section 9.186 predicts that considering the secondary mitigation (restoration proposal for blanket bog habitat), no adverse residual effects are considered likely to remain, with the magnitude of impact, following secondary mitigation being negligible. It is concluded that there is likely to be a direct, permanent, long-term, neutral to moderate beneficial residual effect, which is considered to be minor to moderate, with the restoration proposals being predicted to provide a net benefit. However, given the significantly large losses in the extent of blanket bog habitat (44.73ha) this is not the biodiversity gains that would be expected from such a development and the neutral to moderate benefit should be seen as an under-achievement in terms of blanket bog restoration. As we have

outlined below within our comments on the MRMP, a significantly high level of enhancement and biodiversity gain would be expected for both habitats and species that would be impacted negatively by the development. This we feel has not been achieved through the outlined mitigation/compensation proposals as they stand.

BNG Assessment and Analysis

The BNG analysis of the proposed development requires clarification; specifically, the BNG metric indicates that 21.25ha of blanket bog is to be lost, but, as shown in the ecology section of the Environmental Statement, the combined direct and indirect losses of blanket bog habitat is actually at least 44.73ha. The metric, as used, is significantly under-estimating the loss of an Annex 1 irreplaceable habitat. We would recommend that the Greater Manchester Ecology Unit (GMEU) is consulted on this matter.

It would also be helpful to your authority's determination to clarify the baseline biodiversity units presented in Table 9.5 1 and 9.5 3 of the BNG net gain calculations (Technical Appendix 9-5). Table 9.5 1 show a baseline figure of 1038 biodiversity units (BU) for one of the blanket bog compartments, but no baseline units for any of the others. Table 9.5 3 shows that 1255.94 BU have been generated for the restoration of 118ha of blanket bog habitat but shows no baseline units for any of the blanket bog parcels. It is our understanding that irreplaceable habitat cannot be used within the metric to generate biodiversity units, as there must be a separate, bespoke compensation provided, i.e., the Moorland Restoration works described. This is explicit in the Atmos Consulting letter dated 7th August 2025, which states that:

'As is stated in the guidance, the irreplaceable habitat has been recorded in the metric, but the loss of this habitat has triggered the separate compensation process, outside of the standard BNG calculation. No credits or units are attached to enhancement works on the bog. The 10% gain relates to only to the non-irreplaceable habitats on site'.

However, within the BNG metric calculations document, section 4.2.1 states that:

'The total baseline BU value of area habitats within the Site is 4472.28 BU, with the predicted post development value being 4927.72 BU. This results in an overall net gain of 455.43 BU for area habitats, which represents an increase of 10.18%. The calculations therefore indicate that the proposal to enhance 118ha of poor-condition blanket bog to moderate condition the enhancement of 48ha poor-condition modified grassland to good-condition other upland acid grassland and creation of 0.38ha of poor-condition conifer woodland planting, will satisfy the statutory requirement of a minimum of 10%.'

This would suggest that the bog restoration area has been used in calculating the post development metric.

Table 5.9.3 also appears to confirm that the post development figure of 4927.72 includes the BNG uplift from the proposed restoration of irreplaceable habitat. We find this confusing, as may you as planning authority. We recommend that you require clarification of what has and has not been included within the post development BNG calculation and again we recommend that the GMEU is consulted on this process.

The Trust would also query the enhancement of modified grassland to upland acid grassland. The area of modified grassland was identified in the NVC surveys as a range of habitats that included U6d

- *Juncus squarrosus*-*Festuca ovina* acid grassland, ***Agrostis capillaris* - *Luzula multiflora*** sub-community and U5a - *Nardus stricta* – *Galium saxatile* grassland, species poor sub-community plus mesotrophic grassland communities. The acid grassland habitats should not have been categorised as modified grassland: that should be amended and recalculated. Habitats on areas of deep peat should be entered into the metric as degraded blanket bog as per our comments within the ecology section.

As above, we recommend that the GMEU be consulted on the above matter and their advice taken into consideration.

The Moorland Restoration and Management Plan

We question the statement within the executive summary that '*Degraded peatlands can release carbon into the atmosphere and can in extreme cases increase flood risk due to reduced drainage*'.

Increase in flood risk downslope is caused by increasing the drainage off peat bog habitat, not by reducing it.

The introduction indicates that the moorland restoration and management plan has been produced as part of the bespoke requirement under BNG and that enhancements set out in this MRMP are focused only on the moorland habitats and are considered separate to the 10% BNG requirement. However, as we have outlined within our comments on BNG delivery above, it would appear that the restoration areas have been used to generate biodiversity units within the metric itself, contrary to the regulations: the process requires clarification and consultation with GMEU.

The MRMP indicates that it has been drafted using NatureScot guidance for developments as no comparable guidance currently exists in England. Whilst this is acceptable, it should be pointed out that Scotland supports a far greater area of blanket bog habitat than England, so the lower priority given to degraded bog in Scotland might not be mirrored in the same way in England due to the much-reduced extent of any remaining blanket bog that is in near-natural condition. All blanket bog in England capable of restoration should be considered as a priority for restoration. In fact, Nature Scot itself points out that degraded peatlands can still be capable of storing carbon and supporting rare species and that, if their condition is assessed as being degraded, restoration to improve condition and functioning is recommended. Natural England's advice on this matter should be sought.

The main guidance from NatureScot is that restoration should be at a ratio of 1:10, so that for every 1 ha of peatland habitat lost, 10ha of further peatland would be enhanced. Section 1.3 of the MRMP states that about 20ha of peatland is expected to be lost. This contradicts the ecology section of the Environmental Statement, which shows that considering both direct and indirect losses, 44.73ha of blanket bog communities are expected to be lost. As we have pointed out in our comments on the BNG assessment and analysis, both the direct and indirect negative impacts of the development should be used to provide the full impact of the proposed development on existing blanket bog habitat.

Section 1.3 of the MRMP then goes on to highlight that 118ha of restoration is proposed and that, together with the 200ha of habitat identified for improvement within the community restoration area; - this remains above the 1:10 ratio recommended by NatureScot. We disagree with this claim. Using the 44.73ha figure of total loss/degradation of habitat, 447.3ha of bog would need to be restored to comply with the guidance. The requirement for 447.3ha of bog restoration to achieve

the 1:10 ratio is also quoted within Section 9.180 of the ecology report. The proposed figure is, therefore, far short of the required 1:10 ratio. We would also argue that it is inappropriate to include the community restoration as contributing to the 1:10 ratio. Nature Scot stresses that measures that are beneficial, but which should not be included in calculating the area of restoration include proposals that only propose to manage/reduce grazing and browsing levels or other impacts on peatlands and that this should not be considered as offsetting.

Section 9.181 of the ecology report argues that the NatureScot guidance only applies to peatlands that are undisturbed and actively forming. However, as we have pointed out above, Scotland has far more extensive areas of blanket bog, with a greater area of undisturbed habitat. It is not always appropriate to transfer this reasoning across to a country with smaller areas of habitat in favourable condition. NatureScot's own reasoning behind its recommendations includes the point that degraded peatlands can still be capable of storing carbon and supporting rare species and that if the condition is assessed as being degraded, restoration to improve condition and functioning is recommended. NatureScot's reasoning also makes it clear that the 1:10 ratio is to allow for the fact that restoration alone is insufficient; - as development will inevitably result in a reduction in the extent of peatland habitat. The 1:10 ratio is also important in ensuring that sufficient habitat is within restoration to allow for some failures, as it is not possible to guarantee successful restoration, even when following best practice.

NatureScot further emphasises that a significant level of enhancement is required for priority habitat and that the end result should be that there are additional benefits to the biodiversity of the habitats and species which are being impacted by the development. They emphasise that for priority habitat, that this would mean that additional restoration measures beyond those required to achieve the 1:10 offsetting ratio (lost to restored) are required for enhancement; and that they would expect this to be in the region of an additional 10% of the baseline assessment of the extent of priority peatland habitat. The Trust would argue that the 1:10 ratio should still be adhered to in order for the development to provide significant biodiversity gains. The current compensation package falls short of this and does not justify the predicted loss of 44.73ha of irreplaceable priority habitat.

Section 3 of the MRMP outlines the current moorland baseline. We would refer back to our comments above regarding the conflicting classification of the modified grassland within the BNG analysis and the NVC survey results.

We query the statement within the NVC summary that it is unlikely the examples within the application site are of international importance (Annex 1). The ES ecology report refers to these habitats as Annex1/Habitats of Principal Importance. NatureScot also identifies these NVC communities as priority peatland communities. All blanket bog habitat capable of restoration, whether degraded or in suboptimal condition, is classified as Annex 1 habitat of principal importance.

Section 3.2/3.4 details the condition of the moorland and identifies a number of factors that have led to the degradation of the habitats. We note that the assessment does not include impacts from the existing windfarm and what effects the previous development has had on the habitats or hydrology of the peat bog. Any degradation resulting from the existing windfarm also needs to be identified.

We would call attention to the wording: '*Peat erosion and drying of bog surfaces through poor drainage*'.

Peat bogs dry out due to increased drainage and subsequent pressures on maintaining the hydrology within the peat mass. The phrasing suggests that 'better' drainage would improve the condition of the bog rather than degrading the habitat. We would also point out that Purple Moor-grass becomes dominant due to a combination of factors, not just through changes in grazing regimes. One of the main causes being the drying out of the bog surface due to increased drainage. Correcting the hydrology of the bog to rewet the surface vegetation is therefore critical to reducing the dominance of Purple Moor-grass.

Section 4 of the report details the proposed restoration works, of which we have a number of queries and concerns, as described below.

Section 4.1 Controlled Restoration –proposes that the restoration area would be fenced. The Trust is concerned that the amount of fencing proposed would create a significant predator shadow, which would have a deleterious impact on ground-nesting birds. We would therefore recommend that 'no fence' collars should be used instead of fencing. Given that fences can easily be vandalised, they are unlikely to be an effective barrier to 'off-roading' activities. A monitoring and maintenance plan would therefore be pivotal in ensuring that there can be speedy resolution to the consequences of vandalism to the fences.

We would agree that with ditch blocking, minimalising the distance between blocks is sensible and avoids creating large headwaters that can put pressure on the dam and lead to its subsequent failure. We note that backfilling of ditches is proposed but would caution that without preventative measures the infill might fail. A 'belt and braces' approach should be undertaken, with ditch blocks included within the design at intervals to prevent hydrological pathways being created within the backfilled ditches. We note the preference for stone to create the blocks. We would point out that this is one of the most expensive methods of blocking ditches, requiring the hiring of helicopters, which might be prohibitive. Available resources might well be better used elsewhere on site.

Regarding the proposed infilling with peat, it is proposed that the peat would be restored to form a surface that interacts with the groundwater in a similar way to adjacent in situ peat by not being significantly raised above adjacent surfaces. We assume that this would be infill within the areas of the built infrastructure and that raising of the water table within this area would not be within the scope of the proposed restoration works. Outside of these areas, raising the level of the peat above ground levels could have the beneficial impact of holding water back uphill and aiding the pooling of water by slowing the flow of water off the hillside. It should be pointed out that reusing the peat as infill around the proposed infrastructure so that the current damaging hydrology is maintained would just continue the current process of peat and habitat degradation into the future.

We would also query if the proposal to reinstate the area of bog within the quarry area can be described as restoration. Whilst this would be a desirable proposal, the moving of peat from the area of development to be reinstated within the quarry would be to mitigate the loss of peat not to provide compensation for the destruction of existing habitat. There are also no guarantees that the proposal would be successful, even following best practice, which highlights the need to provide sufficiently large areas for restoration that would allow for a certain degree of failure.

We note that planting of sphagnum propagules is proposed in mid-summer. This is not an appropriate time to plant sphagnum as the planted material will quickly dry out. Spring or autumn planting should be preferred if at all possible. We also note that flailing of the Purple Moor-grass is proposed in autumn. We would point out the flailing of the grass should occur before the planting

and not after or the planting area should be marked out for avoidance, otherwise the operation would damage the sphagnum plants. We would also query if windrowing the flailed material might increase the risk of fire in the event of a warm autumn and also provide a nutrient flush and enrichment of the bog habitat.

The section on peatland turve reuse refers to avoiding sensitive areas where possible, but where it is not possible then the vegetation will be translocated in turves to be used in the restoration areas. We would refer back to our comments on the scoping opinion that within a peat bog, all areas of the system should be considered as sensitive, even those areas that are on shallow peat. The International Union for Conservation of Nature (IUCN) highlighted that whilst applying a minimum depth criterion can help to protect peatlands, it should be recognised that in providing this cut-off point, there is a danger that a fixation on depth could exclude extensive areas of sensitive shallow peat soils. The IUCN report argues that too often, these shallow peat areas are ignored and discounted. The report concludes:

'a policy that only focuses on, and manages for, parts of an ecosystem without recognising all the essential components and connections of the entire system risks causing harm across the system as a whole if essential supporting structures are allowed to degrade or be lost. Deeper peats almost never end abruptly, but instead grade into shallower peat, then into mineral ground. Given that peatland systems are wetlands and essentially large water bodies held within an organic medium, these margins are vital parts of the interconnected whole in much the same way that one part of a lake is indivisible from the rest of the water body. Where policy retains a focus only on deeper peats, it obscures the view of peatlands as this integrated system. Policy should instead overtly address the fact that peatlands are integrated wetland systems, which cannot be successfully maintained, managed or restored if only parts of the system are acknowledged.'

The MRMP indicates that grazing will be excluded from the restoration areas temporarily then gradually allowed to build up. Recommended levels of stocking density on blanket bog are 0.02 livestock units /ha/year. However, it is proposed that LU would be maintained at 0.4 sheep/year. This is higher than recommended and the reasoning behind this needs to be clarified. It is important that the restoration areas be grazed at the recommended rate that would encourage bog vegetation to flourish and spread and this needs to be made clear.

Section 1.2 of the management plan indicates that it is proposed that all the land, including the restoration area would eventually come under community restoration. The impact of this needs to be clarified. Would the grazing restrictions still be applied to the restoration area. Without these restrictions in place, the restored areas would be at risk of degradation through over/under grazing. Clarification is needed as to what future LU are proposed and what, if any, restrictions would be placed on grazing regimes.

Within the proposed community restoration areas, it is proposed that flailing of the Purple Moor-grass would be undertaken to encourage natural growth and diversification of the habitat without any accompanying plans to rewet the land or re-establish bog vegetation through plug planting. However, section 4.1.2 - *increasing sphagnum diversity*; - highlights a report from 'Pilkington *et al.* (2021) that found no conclusive evidence that flailing or windrowing reduced the cover of Purple Moor-grass beyond a temporary setback, and that they concluded that there is currently no known effective measure for controlling this species in blanket bog habitat. The Pilkington report appears to call into question the effectiveness of the proposed management strategy. The Trust would however point out that reinstating the hydrological processes within the peat bogs, in tandem with flailing of

the Purple Moor-grass does reduce the dominance of Purple Moor-grass. Without the accompanying rewetting works, we are concerned that simply flailing the habitat would serve little purpose.

As we have already highlighted, NatureScot emphasises that the 1: 10 ratios of area of habitat loss to area within restoration should not include proposals that only serve to manage/reduce grazing and browsing levels or other impacts on peatlands. We therefore query whether this element of the proposed MRMP can be referred to as restoration.

In general, we feel that the restoration proposals and the MRMP are too generic and put far too much focus on planting over rewetting. Rewetting and repairing to a functional hydrology are the key factors in the successful restoration of peat bogs and this should be the main function and outcome expected of the MRMP.

Regarding future monitoring of the restoration works, in addition to the monitoring of the desirable bog species we would recommend that surveying/monitoring for negative species such as Purple Moor-grass should also be undertaken. This would help to guide any required changes to the restoration proposals. Undertaking future NVC surveys would also help to predict the direction of travel of the habitats and again guide potential changes in management requirements.

Peat Management Plan and survey report

The data presented in the peat depth report indicates that peat at a depth of 0-30cm was present across 43.4% of the study area, with 23.26% distributed across the proposed infrastructure. Whilst we understand that standard calculation models do not include peat less than 30cm deep, it should be acknowledged this exclusion does result in an inbuilt underestimate of peat volumes extracted.

Paragraph 7.2 of the peat survey report implies that heavily eroded drained or afforested peat has little carbon within the upper layers. This sentence is misleading and should read - 'heavily eroded drained or afforested peat has reduced carbon within the upper layers. These degraded peats are still important carbon stores, and the emphasis should be on rewetting these habitats.

We note that in chapter 8: - *Peat Restoration Areas and Reuse Volumes*, it is proposed that an isolated area of peat will be reconnected by infilling a disused quarry. The infilling is to be undertaken without the need for storage of the peat, and it is stated that the advantage of this is that the peat would therefore not be subject to weathering, dewatering and erosion, which would occur if the peat was to be stored before use. However, not all the extracted peat would be reused immediately, and it is proposed that where peat has been extracted for infrastructure then this peat must be stored until construction is complete. No indication is made as to how long the peat will need to be stored; however, construction of the infrastructure would inevitably take many years and despite the proposed storage proposals we feel that weathering, dewatering and erosion of the stored peat would still be likely to occur. Even moving the peat can result in changes to its properties and we have concerns that the integrity of the peat would not be maintained over the extended periods required for it to be stored. We note that it is proposed that the peat be stored in locations where the water table would be kept artificially high and the area bunded. Details of the design of these storage areas would need to be provided.

It is proposed that in areas where peat is to be replaced, water management would be considered in the PC's Construction Method Statements to ensure that as far as possible an appropriate hydrological regime is re-established within areas of disturbance. However, as we have pointed out earlier, these areas have been assessed as being degraded due to a lack of appropriate hydrology.

Putting the system back to its current hydrology would allow the degradation of the peat to continue. Action needs to be taken where possible that will repair the hydrological integrity of the replaced peat so that further degradation is prevented.

Chapter 14: *Hydrology, Hydrogeology and Peat*, refers to determining the sensitivity of the peat and is assessed on a scale of high, medium, low or negligible. We would ask that references be provided for this assessment as well as any national guidance on assessing the sensitivity of peat. As we have pointed out within the MRMP section, the IUCN highlight that areas of shallow peat can also be considered as sensitive parts of the overall peat system. There is a danger that ignoring or downgrading areas of shallow peat can lead to damage across the system as a whole.

Section 14.131 states that the best quality peatland has been avoided by design. However, as we have referenced within the section on ecology, modelling has shown that the area proposed for windfarm development supports habitat that is considered as the most resilient to climate change within the area. It is important for the future restoration and sustainability of the bog that this habitat is safeguarded and protected.

Section 14.202 and 14.203 concludes that the residual impacts are predicted to provide a minor adverse impact and the effects are not significant. This level of residual impact is not satisfactory, and we would expect that the outcome should lead to a significant positive benefit for the peatland habitat, especially given the large losses of blanket bog habitat predicted.

Carbon Calculations and Climate Change Report

Having reviewed the carbon figures the Trust would accept that the overall carbon savings suggested are realistic. However, we feel that based on the current restoration plans provided, the tCO₂e /Ha/year would be difficult to reach during the time period. We would reiterate that best practice should be to identify and target any areas of land not on organic soils for development, as that would increase the gain in the benefit of green energy.

In conclusion, the Trust objects to the proposed application. The restoration compensation is inadequate given the large area of Annex 1 habitat that will be lost as a result of the proposed development. There are a number of concerns and clarifications that we feel are required regarding the provision of biodiversity net gain (BNG). We also have concerns regarding the outlined MRMP and feel that there needs to be significantly more net gain delivered in terms of blanket bog rewetting and restoration. Modelling evidence has shown that the location of the proposed windfarm is within an area that is the most resilient to impact of climate change and has the greatest potential for future restoration, which we feel is a priority for protection from habitat loss. The Trust therefore opposes the development as it stands.

I hope these comments prove useful. If you have any further queries or require clarification, please do not hesitate to contact me.

Yours sincerely,



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