



**National
Trust**

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10th October 2025

Rachel Carney
Planning and Development
Rochdale Council
Number One Riverside
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Dear Ms Carney

Planning Application 25/00680/FUL

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 hardstandings; 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.

Land at and Adjacent to Scout Moor Wind Farm Rossendale and Rochdale

The National Trust has been made aware of the above noted application, which affects property in its ownership.

The National Trust is a charity and Europe's largest conservation organisation, with a current membership of over 5 million people. With the support of our Parliamentary Act, we are legally responsible for the protection of some of the most beautiful,

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historically important and environmentally sensitive places in England, Wales and Northern Ireland.

The Trust believes that appropriate renewable energy development will help to reduce the damage to our properties from climate change and bring long-term benefits to society by reducing the risk of severe impacts in future. However, we also believe that the location and design of all energy generation and distribution schemes should take account of the full range of environmental considerations, including the conservation of valued landscapes, peatlands, biodiversity, the historic environment, and peoples' well-being.

National Trust Property Potentially Affected by the Proposal

The submitted ZTV analysis indicates that the turbines may be visible over a significant distance. In light of this, there are several National Trust properties which may experience landscape and visual effects. A plan showing our landholding in this area is included in the Appendix. These properties include the Marsden Moor Estate (approximately 14km to the southeast), land in the north Peak District (Lyme Park, Hope Woodlands, Derwent and Howden Moors, Park Hall and Kinder Scout – approximately 35km to the south), and the Holcombe Moor and Stubbins Estate, (approximately 5km to the west). Given its relative proximity to the site, the most significant landscape and visual effects will be experienced by the Holcombe Moor and Stubbins Estate.

The Trust owns and manages some 525 hectares (1,300 acres) of land on the Holcombe Moor and Stubbins Estate. This land comprises a variety of habitats from the mixed broadleaf woodland valley of Buckden Wood running up from the Irwell Valley, to the open moorland of blanket bog and heather, culminating at Bull Hill, rising to 418 metres. The mix of habitats is especially noted for its birdlife. The Holcombe Moor and Stubbins Estate was designated as part of the West Pennines Moors Site of Special Scientific Interest in November 2016, on account of its breeding birds and blanket bog habitat. The Trust has undertaken extensive work in recent years to restore the peatland of the moor and this work is ongoing.

The National Trust's land at Holcombe Moor is designated Open Access, giving free access for the public, and this is widely enjoyed by walkers and nature lovers. A long-distance footpath, the Rossendale Way, crosses the northern part of the area. The contribution of the Holcombe Moor and Stubbins Estate as a recreational facility for the wider East Lancashire area and the Greater Manchester conurbation is significant. Characteristic of this part of the West Pennine Moors is its open, wild and windswept appearance, with panoramic views across adjacent urban areas and the Lancashire Plain. Whilst the sense of isolation may be diminished due to the proximity of the urban areas, the contrast can heighten the sense of wildness, a characteristic valued both by visitors and local residents.

Assessment

The National Trust has identified two key areas for comment, of relevance to its particular interest – the impacts upon landscape character and visual receptors on Holcombe Moor, and the impact of the development upon peatland habitats & carbon rich soils. Our comments therefore focus upon these areas. We note the policy support for renewable energy in regard to both climate change and energy security, which is set out by the applicant in their Planning, Design and Access Statement. We understand that it is for the LPA to undertake a planning balance exercise, taking into account both the positive aspects of the scheme, and its adverse impacts, and trust that our comments will be taken into consideration in establishing this balance, and the mitigation approach to be applied as appropriate.

Relevant Policies

The following policies are of particular relevance to the areas of interest identified by the Trust. Given that the application site includes land in both the Rossendale and Rochdale LPA areas, reference is made below both authorities' Development Plans, since it is considered that the adjacent authority's Plan will form a key material consideration in this case, especially given the nature of the proposed development.

Rossendale Local Plan Policy ENV3 'Landscape Character and Quality', states that the distinctive landscape character of Rossendale will be protected and enhanced. Specific reference is made to retaining and where possible enhancing key views.

Rossendale Local Plan Policy ENV7 'Wind Turbines' refers to the identification on the Policies Map of area suitable for commercial wind turbines. It is noted that the proposed development site lies only partly within this area. The policy seeks to avoid the development of turbines on areas of deep peat (defined as over 40cm depth¹) and resists development outside of the defined areas. The policy sets out extensive criteria which must be met, all of which are of key relevance, notably in relation to the conservation of landscape character and key views, the avoidance of cumulative impact and the protection of peat.

Rochdale Core Strategy Policy P2 'Protecting and Enhancing Character, Landscape and Heritage' makes reference to the quality of the borough's landscapes, and requires new development to integrate with natural features and protect important views of hills and valleys.

Rochdale Core Strategy Policy G3 'Renewable and Low Carbon Energy Developments' promotes renewable, low and zero carbon energy generating developments, but requires any harm to be minimised and appropriately mitigated, including any impacts upon the visual character and quality of the landscape, the value of the borough's peatlands as an ecological and hydrological resource and as a carbon

¹ This has been recently redefined as 30cm by DEFRA

sink, and the value of the surrounding area for relaxation and recreation. The policy states that planning permission will only be granted for wind power developments if the site is located in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan, and that the planning impacts identified by affected local communities have been fully addressed.

Rochdale Core Strategy Policy G1 'Tackling and Adapting to Climate Change' states that the Council will address climate change and ensure growth does not increase CO2 emissions by a number of means, including encouraging renewable energy developments providing that they do not cause unmitigable harm to the local area, its character and environmental assets, and ensuring that development does not cause unacceptable harm to the borough's peatlands.

Rochdale Core Strategy Policy G7 'Increasing the Value of Biodiversity and Geodiversity' identifies priorities including the maintenance and enhancement of the peatland habitats of the South Pennine Moors.

Rochdale Core Strategy Policy G10 'Managing Mineral Resources' requires (inter alia) that the impact of development on land with a peat layer will be assessed in terms of biodiversity, hydrology, water quality, climate change and flood risk.

Rochdale Saved UDP Policy EM/14 'Wind Power Developments' states that the Council will support proposals for wind power developments where there is no unacceptable intrusion in the landscape, having regard to the cumulative impact and intervisibility of such developments, subject to a number of criteria. These require (inter alia) no unacceptable effect on the landscape, the best use of topography, siting, design and colour to minimise the visual impact of the proposal, the avoidance of adverse impact upon areas of ecological value, and that no serious harm is caused to the value of the surrounding area for quiet relaxation and recreation.

Rochdale Saved UDP Policy NE/6 'Landscape Protection and Enhancement' states that development will be permitted where it conserves the physical and cultural attributes of the landscape. Proposals will be assessed in regard to a number of considerations, including visual amenity, local distinctiveness, tranquillity and the amenity and recreation value of the landscape. Development affecting the character of the landscape will not be permitted. Reference is made in the supporting text to identified Character Areas. The application site lies partly within an area defined as 'Unenclosed Moorland', the features of which include (inter alia): sweeping landform with open 'wilderness' character, tranquillity, extensive views, and a mosaic of upland habitats often underlain by blanket peat.

Rochdale Saved UDP Policy NE/3 'Biodiversity and Development' states that development proposals affecting areas of peatland should seek to safeguard such areas from loss or damage or any adverse impact on its ecological value.

Places for Everyone Plan Policy JP-G1 'Landscape Character' refers to landscape character types which are defined in the Greater Manchester Landscape Character and Sensitivity Assessment (GMLCSA). The policy states that development within these landscape character types should reflect and respond to the special qualities and sensitivities of its location, and that regard will be had to the GMLCSA guidance for the relevant landscape character type when implementing the policy.

Places for Everyone Plan Policy JP-S2: 'Carbon and Energy' states that the aim of delivering a carbon neutral Greater Manchester will be supported through a range of measures, including taking a positive approach to renewable and low carbon energy schemes and increasing the range of nature-based solutions including carbon sequestration through the restoration of peat-based habitats.

Places for Everyone Plan Policy JP-G8: 'A Net Enhancement of Biodiversity and Geodiversity' seeks (inter alia) to protect peat-based soils.

Given that the proposed site lies partly within the designated Green Belt in both authorities' plans, NPPF Chapter 13 'Protecting Green Belt Land' is applicable. Paragraph 142 states that *The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.* Paragraph 153 states that *When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.* Paragraph 154 goes on to list development which is subject to an exception to this approach. Renewable energy is not listed, and therefore by definition, the proposed development can be regarded as inappropriate development in the Green Belt. This is reflected in Paragraph 160, which states that *When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.*

It is noted that reference is made by the applicant in their Planning, Design and Access Statement to the draft National Policy Statement for Renewable Energy Infrastructure (EN-3). Given this application is not defined as an NSIP, it is for the LPA to determine how much material weight should be afforded to this document. The applicant alludes² to paragraph 2.2.6 of the document, which states that large scale wind energy development *will inevitably have impacts, particularly if sited in rural areas* (albeit this

² Planning Design and Access Statement, 11.9

refers to developments rated 100MW and over). This does not obviate the requirement to mitigate any impacts as far as is practicable however, as set out in paragraph 2.1.8 of the document: *The assessment principles outlined in Section 4 of EN-1 continue to apply to CNP infrastructure. Applicants must show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy.*

Landscape & Visual Impact

In our response to the applicant's Scoping Request, we identified Holcombe Moor and its users as a key receptor. We note that viewpoints have been identified in this area (17 and 18) and that photomontages from these points have been prepared. Impacts upon the landscape character areas within which Holcombe lies (LCA B2: 'West Pennine Moors' and LCA 22: 'Holcombe to Greenmount and Higher Summerseat') have been considered, as has the visual impact upon users of the Moor. We welcome the inclusion in the assessment of the impact upon night-time receptors, as we requested.

In our response, we noted our concern in regard to the potential cumulative impact of the proposed scheme and the existing Scout Moor I development, and the need for this to be considered. It is noted that this has been done via the 'Existing Baseline Scenario' in the applicant's Landscape and Visual Assessment. The applicant has also considered the 'Restored Baseline Scenario', in which the existing Scout Moor I development would be decommissioned and removed following the expiry of its consent in 2033.

For the operational stage of the development, the applicant has concluded that the residual effects of the development upon LCAs B2 and 22 will not be 'Significant' under the Existing Baseline Scenario, but will be 'Significant' with the Restored Baseline Scenario. The effects upon the 'Users of Holcombe Moor and Stubbins Estate' are assessed as being 'Significant' under both scenarios.

These conclusions are based upon a view that '*wind energy is a distinctive characteristic*'³ of the landscape, and that as such, whilst the proposed development would intensify the influence of turbines in the landscape, it would not alter its fundamental character.

In the Trust's view however, greater emphasis should be placed upon the underlying key characteristics of the landscape in establishing cumulative impact, in particular its largely undeveloped nature, tranquillity, views and setting. In this context, wind farms would be considered to be detractor, as opposed to a 'distinctive characteristic'.

Further guidance on the underlying characteristics of the landscape and its relative sensitivity is given in the 'Greater Manchester Landscape Character and Sensitivity

³ Appendix 11.4 Viewpoint Assessment, p 13

Assessment'⁴ (GMLCSA), and the 'South Pennines Wind Energy Landscape Study'⁵ (SPWELS).

Relevant GMLCSA guidance is set out in regard to the 'Open Moorlands and Enclosed Moorland Fringes' Landscape Character Type, which includes LCA 22, as well as LCA 24 'Knowl and Rooley Moor Fringes and Foothills', which covers the southern part of the application site. In regard to the identified 'Views and Perceptual Qualities' for this area, the guidance notes:

Long, panoramic views are afforded by the high elevation of the landscape... The landscape evokes a strongly rural, remote and continuation of character of the Pennine uplands... This landscape is often associated with a sense of openness, remoteness and isolation. This perception can be broken in places by views of urban development and the presence of intrusive modern features... Wind turbines and pylons/overhead lines punctuate the mostly open and undeveloped skylines.

In regard to 'Intactness and Condition' the guidance notes:

The uplands and upland fringes are a remote, highly rural landscape... Large-scale wind turbines and pylon lines form dominant features on the otherwise undeveloped skylines.

The guidance concludes that: *The open unenclosed moorland areas would be of high sensitivity to any type or scale of development.*

Guidance is given (inter alia) to:

Ensure the visual character of the landscape is retained. Avoid development where it would be prominent on the broad, sweeping skylines. Protect long, uninterrupted views from higher ground over the mill settlements in the valleys below, and Greater Manchester communities beyond.

The northern part of the application site is included in Landscape Character Type A: 'High Moorland Plateaux', as defined by the SPWELS. The character summary for the character type states that *It is a windswept, exposed upland landscape raised above the dissecting valleys and is frequently enshrouded by mists and fog and possesses a strong sense of remoteness and 'wildness'... Resource exploitation is visible in the form of power supply structures including pylons, transmission lines, wind turbine developments and communications masts, as well as reservoirs and mineral extraction sites. In some areas, intervisibility between these developments diminishes the sense of isolation.*

⁴ GMCA, 2018

⁵ Rossendale, Burnley, Calderdale, Kirklees and Barnsley Councils, 2014

In regard to landscape sensitivity, the guidance makes specific reference to Scout Moor, noting that although it is of lesser landscape quality, scenic quality and natural heritage interest than other parts of the LCT, it remains highly sensitive in terms of skylines and settings, visibility and views.

The SPWELS also sets out guidance in regard to Landscape Character Type B: 'Moorland Hills', which includes LCA B2, covering the northern part of Holcombe Moor. The guidance identifies *a sense of remoteness and wildness created by the altitude, absence of settlement and long wide views* as a 'Key Environmental Feature' of this area.

In regard to landscape sensitivity the guidance states:

This LCT is of a relatively open and undeveloped character with some important skylines, settings and views; areas of recognised scenic quality; natural and cultural heritage interest; and regional recreational importance as part of the West Pennine Moors. All of these attributes heighten sensitivity to wind energy development, despite its large scale and tracts of consistent landcover (which would lessen sensitivity). Areas of highest sensitivity are around Haslingden Grane and Holcombe Moor, where there are important skylines, settings and views, as well as notable cultural heritage and recreational features.

In the context described above, the Trust remains concerned in regard to the cumulative effects of the proposed development, and considers that this has been underestimated by the applicant, particularly in regard to its impact upon landscape character. We would highlight a number factors in particular, which are apparent when considering the photomontages prepared for viewpoints 17 and 18:

- The undeveloped area between turbines is significantly reduced with the addition of Scout Moor II. This area is of key importance in allowing the underlying rural character of the landscape to remain dominant.
- The influence of wind energy development extends further to the north, taking up a wider proportion of the skyline, and extending the footprint of Scout Moor I/II closer towards the more distant developments of Reaps Moss and Todmorden.
- The relative difference in height between the turbines is very apparent towards the north of the layout, specifically in regard to turbines 13, 14 and 15. This presents an awkward juxtaposition, which is likely to draw the eye of receptors.

NatureScot Guidance⁶ states that *It is likely that as more wind farms are developed they will begin to be perceived as a key landscape characteristic and will therefore change the landscape character.*

In the Trust's view therefore, the impacts of the development upon landscape types B2 and 22, will be 'Significant' in both the 'Existing Baseline Scenario' and 'Restored Baseline Scenario'.

Peatland Habitats & Carbon Rich Soils

It is noted that the site is located on an area of blanket bog, and that peat will be excavated in order to facilitate the development. All of the proposed turbines, apart from T1 and T2, are located on deep peaty soils⁷.

The National Trust recognises the importance of peat, as a valuable habitat, for carbon sequestration purposes, and for flood risk management. This is reflected in our aforementioned restoration work at Holcombe Moor. Damage to peat through development can have a significant effect. Given that the formation of blanket bog takes millennia, adverse impacts are difficult to mitigate. Any loss of peat should therefore be avoided as a first principle. Where a development proposes the loss of peat, robust justification should be provided, and extensive measures put in place in order to offset the loss. We note in regard to the latter that the applicant proposes to restore the wider peat moorland area, as set out in the Moorland Restoration and Management Plan.

A National Trust ecologist has assessed the application and relevant supporting information in regard to peat, with reference to relevant good practice guidance. The assessment is included in full in Appendix 2.

The Trust assessment concludes that proposal presents both risks and opportunities for peatland restoration. The supporting documents demonstrate an intent to minimise impacts and incorporate restoration measures, but clarifications are needed on peat volume calculations, restoration / offsetting targets, monitoring methods, and the treatment of indirect losses to ensure that the scale of impacts is fully recognised and appropriately compensated. Furthermore, the effectiveness of proposed restoration techniques such as backfilling requires further evidence and justification before being relied upon. Ultimately, if the project proceeds, it will be essential that peatland restoration and management go beyond mitigation alone and deliver a clear net benefit for carbon storage, biodiversity, and hydrological function.

⁶ 'Assessing the cumulative landscape and visual impact of onshore wind energy developments', 2021

⁷ Deep peat in England is defined as 0.3 m depth (DEFRA, 2025) and Natural England have adopted 0.3 m peat depth for defining blanket bog (Natural England, 2025), an irreplaceable habitat and one of our largest carbon stores.

Conclusion

The National Trust is supportive in principle of renewable energy. We acknowledge the planning policy support for such development, and the benefits the proposed wind farm could generate in terms of energy production and a reduction in greenhouse gas emissions. However, in establishing the planning balance it is important that the impacts of the development are fully acknowledged, and mitigated as appropriate.

In this respect, we note that the applicant has concluded that there will be 'Significant' landscape and visual impacts upon the users of Holcombe Moor during the 'Existing Baseline Scenario' and 'Restored Baseline Scenario', and that LCAs 22 and B2, within which Holcombe Moor lies, will experience 'Significant' effects in the latter scenario. In the National Trust's view, these Significant effects upon landscape character will also be experienced during the Existing Baseline Scenario, due to the cumulative impact with the existing Scout Moor I development.

No mitigation is proposed in order to address these impacts. Particularly given the high value of Holcombe Moor as an Open Access recreational resource, and the large number of sensitive visual receptors consequently affected, consideration should be given to the potential for reduction of the landscape and visual impacts upon the Moor, through revision of the layout of the scheme and/or a reduction in the height of the turbines to be used. Given the scale of the impact, a package of measures which would support environmental improvements on Holcombe Moor would be justified, in order to offset the unmitigated effects.

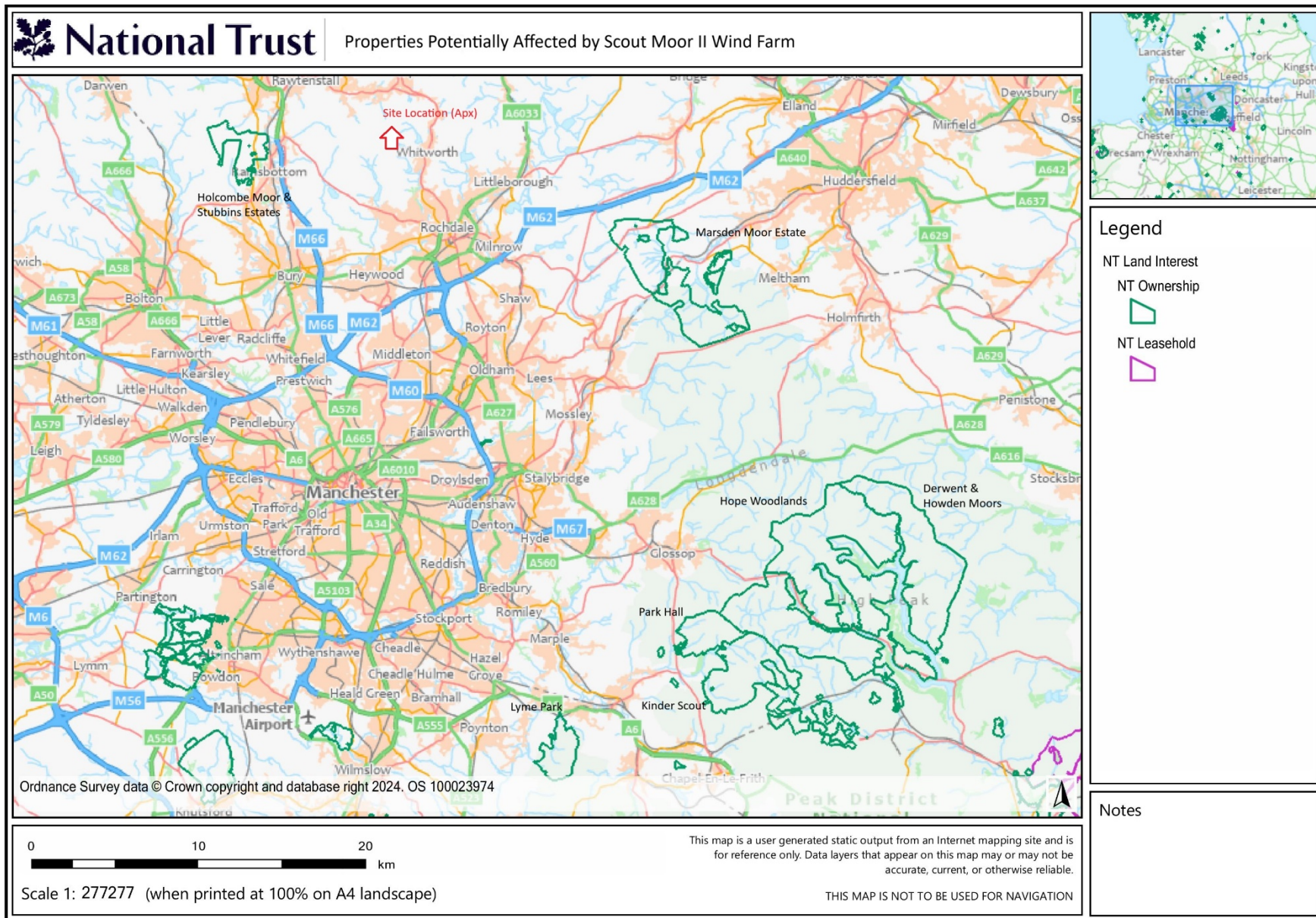
We are concerned in regard to the loss of peat as a result of the construction of the proposed wind farm. Whilst noting the potential benefits arising from the restoration of peat across the wider moorland area in the longer term, we have identified a number of issues which require clarification.

In the National Trust's view therefore, the proposal as currently presented raises conflict with the policies referenced in the Assessment above. Consequently, until it can be demonstrated that the above issues have been suitably addressed, the National Trust objects to this application.

Yours sincerely

Richard Pearse MRTPI
Land & Marine Planning Adviser

Appendix 1



Appendix 2 – National Trust Assessment of Implications for Peatland Habitats and Carbon Rich Soils

Introduction

This document provides feedback on the Scout Moor II Wind Farm proposal, with a particular focus on the implications for peatland habitats and carbon-rich soils. In line with National Planning Framework 4 (NPF4) Policy 5d and NatureScot (2023) guidance, the assessment reviews whether the information submitted within the supporting documents adequately addresses peatland condition, depth, and restoration potential. The appropriateness of the Peat Management Plan (PMP), Habitat Management Plan (HMP), Moorland Restoration and Management Plan (MRMP), and other related documents and figures have been reviewed, highlighting gaps, inconsistencies, and opportunities for strengthening the approach to mitigation and restoration. The aim of this feedback is to ensure that the development is assessed against best practice standards, and that the long-term integrity of the peatland resource is safeguarded while exploring the scope for meaningful restoration interventions.

NatureScot (2023) [Advising on peatland, carbon-rich soils and priority peatland habitats in development management | NatureScot](#) was used to provide a structure to the feedback.

Information requirement

National Planning Framework 4 (NPF4) Policy 5d states that where development on peatland, carbon-rich soils or priority peatland habitats is proposed, a detailed site-specific assessment is required. NatureScot (2023) expect that in accordance with their [guidance](#) and following other requirements under HRA and EIA regulations, information on extent and condition of carbon-rich soils and peatland habitats should be provided for the whole site proposed within the development 'red line' boundary and should include: peat depth survey, habitat survey and report (NVC), Habitat Management Plan (HMP), Peat Management Plan (PMP), Peat Landslide Hazard Risk Assessment (PLHRA), and Construction Environmental Management Plan (CEMP). Documentation which can help with the understanding of the development can be found in the following sections: non-technical summary, Ecology, and Geology and Hydrogeology.

In addition to the documents listed above the Moorland Restoration and Management Plan (MRMP) is essential, identifying areas of degraded peatland and setting out appropriate peatland restoration interventions.

The table below lists the documents provided in the application that are relevant to the peatland habitat, a definition of what the document should include (based on NatureScot, 2023), and feedback related to each document.

Document	NatureScot definition of what document should include	Comments
Peat depth survey	This should be an overview of the whole site with a more specific survey where the infrastructure is proposed.	All turbines, apart from T1 and T2, are located on deep peaty soils (see 01137_SMII_ES_V1_FIGURE_14.2__SOILS_AND_PEA_T_MAPPING-500466.pdf). Ten turbines and the substation are located on areas where some of the measured peat depths are between 0.5-1.0m; 4 turbines & the construction compound are located on areas where some of the measured peat depths are between 1.0-2.0m; and 2 turbines are located on areas where some of the measured peat depths are between 2.0-3.0m (see 01137_SMII_ES_V1_FIGURE_14.8_-_PEAT_DEPTH_OF_PENETRATION_AND_PROBE_LOCATIONS-500477.pdf). The peat depth distribution across infrastructure is also shown in table 2 in the PMP.
Habitat survey & report (NVC) Information relevant to habitat survey and NVC communities is contained within: Moorland Restoration and Management Plan Ecology Chapter	Interpretation of condition of peatland systems including information on erosion features as well as detail on the presence of topographical factors and species.	The NVC survey recorded a total of nineteen communities. The authors consider eight to be of relevance to moorland and peat restoration. However, while NVC communities may indicate condition, in this instance they are being used to infer whether the habitat is peatland and / or suitable for peatland restoration. Natural England has adopted 0.3 m peat depth for defining blanket bog (Natural England, 2025); therefore, NVC communities should not be used in isolation but in conjunction with peat depth when making recommendations on relevance to peatlands and / or restoration. For example, there are large areas mapped as grassland or heath communities, which based on peat depth are more likely to be degraded blanket bog habitats.

		Based on NVC communities, predicted habitat losses within the assessment boundary where the effect is considered to be major totals 44.73 ha, 18.28ha of which will be direct loss. M25 <i>Molinia caerulea</i> – <i>Potentilla erecta</i> mire (habitat loss, modification of habitats through hydrological change and altered hydrological pathways) • Total loss of 32.75ha, 17.81ha of which will be a direct loss. Direct and indirect loss equates to 7.48% of the 437.84ha recorded within the Assessment Boundary. • Effect is considered to be major. • Page 9.33-4 01137_SMII_ES_V1_-_CHAPTER_9_ECOLOGY-500412.pdf M20 <i>Eriophorum vaginatum</i> blanket and raised mire (habitat loss, modification of habitats through hydrological change and altered hydrological pathways) • Total loss of 6.60ha of M20, 0.01ha of which will be a direct loss. Direct and indirect loss equates to 10.57% of the 62.42ha recorded within the assessment boundary (including the mosaics). • Effect is considered to be major. • Page 9.34 01137_SMII_ES_V1_-_CHAPTER_9_ECOLOGY-500412.pdf M3 <i>Eriophorum angustifolium</i> bog pool (habitat loss, modification of habitats through hydrological change and altered hydrological pathways) • Total loss of 5.38ha, 0.37ha of which will be direct loss. Direct and indirect loss equates to 8.42% of the 63.89ha total of this habitat present (including the mosaics). • Effect is considered to be major.
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		• Furthermore, NatureScot (2023) state that M3 is one of three priority communities that should be completely avoided. • Page 9.34 01137_SMI_ES_V1_-_CHAPTER_9_ECOLOGY-500412.pdf No information is included on erosion and surface features (i.e., bare peat, artificial drains, gullies and hags) in the Moorland Restoration and Management Plan. Mapping of erosion and surface features is usually the first step in creating a restoration plan and information on these features can aid understanding in relation to area of impact of restoration, e.g. by placing 30m buffer around drains and gullies.
Moorland Restoration and Management Plan (MRMP)		NatureScot (2023) recommend that restoration to achieve offsetting (i.e. compensation rather than biodiversity enhancement) would be in the order of 1:10 (lost:restored), i.e. 1ha loss of peatland should result in measures to restore 10ha of peatland. For Scout Moor II, the MRMP states that c.20ha of peatland is expected to be lost, therefore the objective is to restore c.200ha. However, the 20ha figure refers to direct loss, if this also included indirect loss the area would be higher, as would the compensation area. The MRMP identifies 118ha for peatland restoration and the remainder is identified for 'community restoration' consisting of flailing of Molinia and grazing (pages 2-3). NatureScot state that proposals to only manage/reduce grazing browsing levels or other impacts on peatland should not be considered as offsetting. However, including this land management measure in combination with restoration would be advisable.

		In line with NatureScot guidance, areas identified for flailing and grazing (community restoration) should only contribute towards restored areas, if they are in combination with peatland restoration. According to Figure 9.8, the proposed peatland restoration interventions total 119ha. The western area will be fenced and has the following restoration proposed: gully reprofiling (46ha), patch repair (1ha), bog recreation (3ha), plug planting and spot turving (29ha), total 79ha. The Eastern area will be unfenced and will form the community restoration area but also has the following restoration interventions proposed: flailing, bunding and plug planting (18ha) and drain blocking (22ha), total 40ha. In total, this adds up to 119ha. If the objective is to restore 200ha and flailing and grazing (community restoration) alone cannot contribute towards this area, then additional areas for restoration need to be identified. The MRMP suggest backfilling as an alternative to dam / blocking (page 17). Backfilling involves, instead of blocking or creating dams at certain points, entirely filling in a ditch or watercourse. The MRMP states that this is the most effective method for rewetting peatland but would only be done in areas of significant drying. The best methodology to complete an entire ditch backfill is to use a large quantity of peat and lay turves on top. This is not a technique that I am aware of. Evidence should be provided that this technique has been used successfully
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		elsewhere, and monitoring should be employed to assess the effectiveness of the technique. I am concerned about peat/sediment washing out of gullies or drains during high flow, particularly if backfilling is not done in combination with dams. This is a way of using the excavated peat onsite. NatureScot (2023) state that a proposal for the re-use of peat on-site as a backfill material is not an effective mitigation or enhancement practice of carbon-rich soil and functional peatland. The reinstatement of general earthworks and excavated areas with layer of re-used peat, even if respecting the structure of acrotelm/catotelm, is not by itself sufficient to achieve functional peatland habitats or protect from further degradation to soil carbon stocks, as such it cannot be considered as offsetting or enhancement. The MRMP states that if there are insufficient turves for revegetation of bare peat that seed will be used. This is a tried and tested method in the South Pennines but usually involving application of lime and fertiliser in addition to seed to ensure success. Furthermore, some of the species of rush found on site may actually be negative indicator species and it would not be advisable to include them in the seed mix (page 22). The MRMP states that the peat excavated as part of the construction will be reinstated onsite to reconnect this peatland with the wider bog on Cowpe Moss and create new peatland. This amounts to 3ha of new bog creation, shown by the purple area in Figure 9.8. As above, according to NatureScot (2023), this should not be considered as offsetting or enhancement.
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Habitat Management Plan (HMP)	This should contain enough detail to demonstrate that proposals for peatland restoration are likely to be effective. NatureScot (2023) advise provision of clear mapping of the condition of the peatland habitats (whether Near-Natural, Modified, Drained and Actively Eroding), identification of site-based restoration features (hags, gullies, peat dams etc), identification of a restoration footprint around these features, based on identification of ditches to be blocked for example. The outline HMP should include information on past and current management, and proposals for future management including explanation of how grazing/browsing will be appropriately managed. It should describe the proposed restoration methods informed by best practice advice.	The HMP outlines peat habitat monitoring to include quadrats to monitor vegetation and dipwells to monitor the water table. This is standard monitoring for peatland restoration sites, although the proposed attributes for the vegetation quadrats (based on McDonald et al., 1998) seem limited to common heather, heath spp., bilberry cover and Sphagnum/bryophyte cover. A survey that records all species would be more appropriate. The suggested method doesn't appear to include grasses or sedges and given that large parts of the site are dominated by purple moor grass and one of the aims is to reduce the dominance of purple moor grass, then this would also need monitoring. Mapping of the condition of peatland habitats is provided in Figure 14.11 but it does not appear this has been done correctly. It only identifies areas of actively eroding, modified and modified with near natural features retained. No areas are mapped as drained (i.e., within 30m of an artificial drain or gully system), yet 22ha are identified for drain blocking and 46ha identified for gully reprofiling (Figure 9.8). These interventions would be carried out in areas identified as drained. There appears to be no evidence in the HMP of identification of erosion and surface features, required for mapping condition (see above) and for planning restoration interventions. These data would help in identifying additional areas for restoration should this be required to meet the 1:10 offsetting requirement.
Peat Management Plan (PMP)	This should include detail on the extent of peat within the proposal, impacts and mitigation adopted to reduce impacts to	The PMP states that the design of the Project for Assessment has prioritised avoiding areas of deep peat and sensitive peatland habitat wherever feasible. However, the PMP also states that that peat >0.3m depth is present across c.76.5% of infrastructure. Deep peat in England

	peat soil and other carbon-rich soils. A table detailing the infrastructure and associated average peat depths, estimated volumes excavated and re-used should be detailed to demonstrate the impacts on peat. The plan should also include detail on the temporary storage of peat soils, the habitat type and condition of the area on which they will be stored, as well as a consideration of the degradation of the quality of the material stored over time, with steps taken to ensure the peat remains in a reusable condition. Detail on the reuse of peat should indicate whether this will be in reinstatement, restoration, on-site offsetting, off-site offsetting or enhancement.	is defined as 0.3 m depth (DEFRA, 2025) and Natural England have adopted 0.3 m peat depth for defining blanket bog (Natural England, 2025), an irreplaceable habitat and one of our largest carbon stores. Peat with a depth of <0.3m, is not included in the excavation estimate volumes (page 9 PMP), despite peat <0.3m being present across 23.5% of infrastructure (page 5 PMP). As there is no requirement for peat to attain a particular depth for it to be recognised as peat (IUCN, 2023), the excavation estimate volumes should include all excavations of peat regardless of depth. A larger excavated estimate volume would result in a higher magnitude of impact and might change the level of effect as assessed in the hydrology, hydrogeology and peat chapter. The HMP (page 21) states that the sensitivity of the peat is determined by both the depth and the condition of the peat, as heavily eroded, drained or afforested peat has little carbon within the upper layer and therefore the sensitivity of the peat is considered to be lower. Degraded peatlands do emit carbon dioxide, however, to say that there is little carbon stored in the upper layer of peat is incorrect. A study on spatial variation in bulk density and soil organic carbon in the degraded Bamford water treatment works catchment (Crouch & Chandler, 2021) found that the mean carbon concentration (g cm⁻³) at 0-15 cm depth was 0.076 g cm⁻³. It then dropped to 0.060 g cm⁻³ at 15-30 cm depth, remained steady at between 0.070 and 0.074 g cm⁻³ at 30- 230 cm depth, before rising again to 0.087 g cm⁻³ at 230-380 cm depth. The HMP describes how excavated peat will be used to reconnect an isolated area of high-quality peatland habitat to the rest of the site. This is not a technique that I am aware of. Evidence should be provided that this technique has been used successfully elsewhere, and monitoring
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		should be employed to assess the effectiveness of the technique.
Peat Landslide Hazard Risk Assessment (PLHRA)	This will contain detail on the quality and stability of carbon-rich soils, and information on extent and condition of drainage features.	No feedback provided as detailed assessments of peat landslide hazard as a precursor to risk assessment require an understanding of geology, peat hydrogeology and ecology, and the geotechnical properties of peat and the underlying materials. Accordingly, assessments of peat landslide hazard and risk require a competent, multidisciplinary team comprising at least three of the following disciplines: (i) Engineering geologist; (ii) Geomorphologist; (iii) Geotechnical engineer; (iv) Hydrogeologist/hydrologist; (v) Ecologist.
Construction Environmental Management Plan (CEMP)	This document should include detail on the design of the proposal, including any mitigation already applied to the project. Detail on the construction of the development as well as any safeguarding and reinstatement measures which will be adopted.	This document presents the mitigation measures. Those with relevance to peat are described under hydrology, hydrogeology and peat (pages 18-20). No new feedback provided as already covered under feedback on other documents.
Hydrology Report		The hydrology report makes an assessment of the sensitivity of peat based on the degree by which the peatland in its baseline condition has been degraded by natural or man-made activities. Uneroded, open peatland without evidence of drainage is considered to be of highest sensitivity, while peatlands degraded by forestry, drainage or erosion are considered to have a poorer baseline condition. A depth criterion is also applied, in which deeper peats are considered to hold more carbon and more likely to exhibit a functional hydrological system, with associated flood regulation benefits (page 14.8). This assessment is based on defined characteristics and values and professional experience (page 14.7). It isn't clear whether the characteristics and values are based on existing guidance or defined

		by the authors. The sensitivity of any proposed development related to peat is therefore based on the percentage of its infrastructure on each category of peat as: • High – >25% of the infrastructure is located on peat >2m in open terrain or >3m in forestry, densely drained, eroded or gullied open terrain; 14.9 • Medium – >25% of infrastructure is located on peat with depth between 1m – 2m in open and undegraded terrain or >2m in forestry, densely drained, eroded or gullied open terrain; • Low – >25% of infrastructure located on peat with depth between 0.3m – 1m in open and undegraded terrain or with depth between 1m – 2m in forestry, densely drained, eroded or gullied open terrain; and • Negligible - >75% of the infrastructure is located on non-peat or peaty / organic rich soils less than <0.3m in depth, or peat <1m in depth that is in forestry, densely drained, eroded or gullied (page 14.9). Deep peat in England is defined as 0.3 m depth (DEFRA, 2025) and Natural England have adopted 0.3 m peat depth for defining blanket bog (Natural England, 2025), an irreplaceable habitat and one of our largest carbon stores. The Project for Assessment is classified as having an overall low sensitivity because >75% of the Project for Assessment is on <1m of peat (page 14.30), i.e., classified as peat with depth between 0.3m – 1m in open and undegraded terrain or with depth between 1m – 2m in forestry, densely drained, eroded or gullied open terrain (page 14.8). The hydrology report suggests that there is likely to be a direct,
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		temporary, short term adverse effect which is considered to be minor. This is based on the assumption that all excavated peat can be reused on site for peat restoration. The presence of access tracks and hardstanding also has the potential to alter the hydrological continuity within the peat by obstructing and diverting groundwater within the peat. The hydrology report states that, in order to maintain the hydrological continuity in these areas the infrastructure will be designed to allow water to flow through the semi-permeable tracks in conjunction with specific drainage and regular culverts that will transfer groundwater and disperse it in a diffuse manner across the down gradient peat. Drainage will also be designed to avoid the development of preferential pathways that can remove water from saturated areas of peat (page 14.33).
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Conclusion

The Scout Moor Wind Farm proposal presents both risks and opportunities for peatland restoration. The supporting documents demonstrate an intent to minimise impacts and incorporate restoration measures, but clarifications are needed on peat volume calculations, restoration / offsetting targets, monitoring methods, and the treatment of indirect losses to ensure that the scale of impacts is fully recognised and appropriately compensated. Furthermore, the effectiveness of proposed restoration techniques such as backfilling requires further evidence and justification before being relied upon. Ultimately, if the project proceeds, it will be essential that peatland restoration and management go beyond mitigation alone and deliver a clear net benefit for carbon storage, biodiversity, and hydrological function.

References

Natural England (2025). Definition of Favourable Conservation Status for Blanket bog (RP2967). [Definition of Favourable Conservation Status for Blanket bog - RP2967](#). Accessed 10/09/2025

NatureScot (2023). Advising on peatland, carbon-rich soils and priority peatland habitats in development management [online]. [Advising on peatland, carbon-rich soils and priority peatland habitats in development management | NatureScot](#). Accessed 10/09/2025.

Crouch, T and Chandler, D. (2021) Spatial variation in bulk density and soil organic carbon in the Bamford water treatment works catchment. Moors for the Future Report, Edale [online]. [Spatial-variation-in-bulk-density-and-soil-organic-carbon-in-the-Bamford-water-treatment-works-catchment.pdf](#). Accessed 10/09/2025.

DEFRA (2025). Burning banned on England's deep peat to protect wildlife [online]. [Burning banned on England's deep peat to protect wildlife - GOV.UK](#). Accessed 10/09/2025.