

Rachel Carney
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Rochdale Borough Council
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By email to: Rachel.Carney@Rochdale.Gov.UK

17/10/2025

Application Number : 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 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.

Location: Scout Moor Wind Farm Rochdale

Applicant: Cubico UK Development (Wind 1) Limited

Dear Mr Rachel

Please accept this letter as my response regarding the above application for an additional 17 turbines on Scout & Rooley Moors on behalf of the Royal Society for the Protection of Birds (RSPB).

We wish to raise the following concerns in relation to the proposed deliverability of the proposed Moorland Restoration and Management Plan.

1. Uncertainty with regard to the mapped areas of peatland loss and restoration
2. Efficacy of the proposed restoration in this location

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The RSPB is part of BirdLife International, a network of passionate organisations, working together to save nature across the world.

The RSPB

The RSPB is passionate about nature and dedicated to saving it. Since we started on our mission in 1889, the threats to nature have continued to grow but we've grown to meet them too.

We're now the largest nature conservation charity in the country, consistently delivering successful conservation, forging powerful new partnerships with other organisations and inspiring others to stand up and give nature the home it deserves.

Climate change poses the single greatest long-term threat to nature, and the RSPB recognises the essential role of renewable energy in addressing this challenge. We also know that the shift away from fossil fuels must happen now if we are to achieve net zero by 2045 and that wind power is one of the most advanced renewable technologies. The RSPB therefore advocates renewable energy, including wind. However, we only support this when delivered in harmony with nature, meaning no harm is caused to important populations of birds and wildlife in the process.

We acknowledge that wind turbines can cause disturbance and habitat loss to birds, as well presenting the risk of collision. However, we work hard to scrutinise windfarm proposals to ensure thorough environmental impact assessments have been carried out and where possible work with developers to reduce risks to nature. We object to the small number of windfarm proposals that we consider could pose a serious threat to important bird populations, other wildlife or their habitats.

Comments in relation to –

1. Uncertainty with regard to the mapped areas for peatland loss and restoration

The ambition to restore extensive areas of peat moorland is welcome, however there appears to be a variety of area measurements given within the application documents relating to peat loss, and therefore there area required for restoration at a ratio of 1:10.¹ The Moorland Restoration & Management Plan (MRMP) suggests that the area of peatland to be lost is 20ha, and therefore the objective to restore c.200ha of habitat, is reasonable. However, Table 9.9 of the Environmental Statement, Section 9 Ecology would seem to contradict this in that it suggests the loss, direct or indirect, of 44.73ha

¹ Introduction paragraph 3, page 2 Moorland Restoration & Management Plan Rev 5, Atmos June 2025, as recommended by NatureScot

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of habitat associated with blanket bog (M3, M20 & M25)² and therefore peat. Within these losses, 23.63ha is given a direct loss and 21.1ha of indirect loss, therefore neither of these figures would appear to accord with the 20ha referenced in the MRMP, and in fact appears to show that the true area for peatland restoration should be 447.3ha, rather than the suggested 200ha, meaning that the 346ha referenced³ as being 118ha off common and 228ha on common, is still **101ha short of the requirement to meet the 1:10 ratio**, please note that we agree with the following comment made by the Wildlife Trust –

"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"⁴.

"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"⁵.

2. Efficacy of the proposed restoration in this location

Scout Moor is subject to high levels of recreational use, some of which are incompatible with the proposed moorland restoration, we are very concerned with regard to the proposed use of stock fencing in this location, although we concede that without removal of grazing across the wider moor, this is a necessity.

Having said that, and from experience, stock fencing is easily vandalised and unlikely to provide sufficient barrier to the illegal off-road activities taking place on site.

We suggest that it is also highly unlikely that a monitoring and maintenance plan could effectively be delivered to prevent damage to the restored areas by some members of

² 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.

³ Page 3, paragraphs 22/23 of the Planning, Design & Access Statement, Atmos July 2025

⁴ Page 2, paragraph 5, Lancashire Wildlife Trust Response, November 2025

⁵ Page 5, paragraph 1, Lancashire Wildlife Trust Response, November 2025

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the illegal off-roading community and grazing livestock. Whilst these restoration proposals are, as suggested by the Applicant, in use elsewhere, they are deployed in most cases in areas where there is considerably less pressure from recreation and where overall stocking numbers have been reduced.

With regard to stocking numbers note that the MRMP indicates a level of stocking outwith the restoration areas higher than that recommended for upland peat.

The Government Advice on management and grazing actions for (...) moorland, updated 28 October 2025⁶ (which applies to England) suggests the following in respect of peatland habitats –

"Maintaining waterlogged conditions is important for the development of peatland vegetation. These habitats do not need to be grazed (...)"

Further the Government advises that –

*"A limited livestock density of **less than 0.04GLU/ha** is appropriate" and that a removal period of at least 6 months during the autumn and winter is likely to be beneficial (...) to minimise damage to the peat surface and structure..."*

The highlighting is our own, we note however that the MRMP proposes that stocking levels higher than 0.4GLU/ha are to be maintained across the wider moor outwith the restoration areas, and once fencings is removed within these areas too, we would therefore suggest that this level is too high, and with fencing removed this stocking level risks damage / reversing the beneficial effects of restoration both within the restored areas of peatland and the wider Scout Moor within the areas of 'Community restoration'.

Summary

RSPB is supportive of the deployment of wind turbines, but we have significant concerns over both the area over which peatland restoration will take place and the long-term benefits of the suggested moorland restoration.

⁶ <https://www.gov.uk/government/publications/moorland-mapping-pa5-complete-your-record/understand-the-best-management-and-grazing-actions-for-your-moorland>

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Yours sincerely



Jeremy Sutton, Senior Conservation Officer, North West England

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