

Planning Statement

Proposed Temporary Meteorological Mast

Cubico UK Development (Wind 1) Limited

February 2025

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Our reference

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1. Introduction

- 1.1 This Planning Statement has been prepared by Turley on behalf of Cubico UK Development (Wind 1) Limited ('the Applicant' or 'Cubico'). It is submitted in respect of an application for full planning permission for a temporary meteorological mast ('met mast') on land at Rooley Moor ('the Application Site').
- 1.2 The Application Site is entirely located within the administrative boundary of Rossendale Borough Council ('RBC'). It is not located on Common Land or within the Green Belt.
- 1.3 The existing Scout Moor Wind Farm ('SMWF') comprises 26 no. wind turbines and associated ancillary infrastructure. Each turbine stands to a height of 100 metres to blade tip.
- 1.4 In November 2024, Cubico announced that it was investigating proposals for a new onshore wind farm – to be known as Scout Moor II – comprising up to 21 wind turbines (up to 180m in height) with a generating capacity of up to 100MW¹, associated infrastructure and access. The proposed Scout Moor II is located on land adjacent to the existing SMWF.
- 1.5 The proposed met mast is required in order to assist Cubico in obtaining a better understanding of the prevailing wind regime and to assist with the funding, construction and long-term operation of the Scout Moor II wind farm.
- 1.6 The proposed met mast will be erected for a maximum period of up to 36 months.
- 1.7 The description of development is as follows:

"Erection of a temporary meteorological mast with associated data collection and monitoring equipment, and other ancillary infrastructure".
- 1.8 The full range of plans / drawings and documentation which is submitted by the Applicant – and which will assist RBC in their consideration and determination of the application – is set out at **Appendix 1**.

Structure of the Planning Statement

- 1.9 This Planning Statement is intended to assist RBC, as the Local Planning Authority ("LPA") responsible for determining the application, by providing an evaluation of the Proposed Scheme against the relevant planning considerations.
- 1.10 Having regard to Section 38(6) of the Planning and Compulsory Purchase Act 2004, this Planning Statement considers the conformity of the Proposed Scheme with the

¹ While it is noted that the threshold for electricity generation to be Nationally Significant Infrastructure Projects (NSIPs) is to be increased to 100MW by the end of 2025, an application for full planning permission will be submitted under the Town and Country Planning regime to RBC and Rochdale Metropolitan Borough Council.

adopted Development Plan and the weight to be applied to other material planning considerations.

1.11 The remainder of this Planning Statement is structured as follows:

- Section 2 sets out the background to the application and provides an overview of the Application Site and the proposed met mast.
- Section 3 provides a brief outline of relevant planning policies.
- Section 4 appraises the proposed met mast against relevant planning policies.
- Section 5 presents the planning balance and concluding remarks.

2. The Proposals

- 2.1 This Chapter set out the relevant background to the application and provides a full description of the proposed met mast.

Background

- 2.2 The existing SMWF is located on open moorland between Edenfield, Rawtenstall and Rochdale. The development comprises 26no. turbines with a total installed capacity of 65MW. SMWF opened in September 2008 and is now operated by Scout Moor Wind Farm Limited, owned by MunichRe ('MEAG').
- 2.3 In November 2024, Cubico announced its intention to investigate the potential to construct another wind farm adjacent to SMWF – to be known as Scout Moor II – comprising up to 21 wind turbines (up to 180m in height) with a generating capacity of up to 100MW², associated infrastructure and access. A preliminary round of public and stakeholder consultation was completed by Cubico in respect of the Scout Moor II proposals in late 2024, and a request for an Environmental Impact Assessment ('EIA') Scoping Opinion is currently pending consideration by RBC and RMBC³. It is currently anticipated that applications for full planning permission will be submitted to RBC and Rochdale Metropolitan Borough Council ('RMBC') – as the boundary spans the administrative boundaries of the two Local Authorities – in May 2025.
- 2.4 In order to further inform the assessment of prevailing environmental conditions, a met mast is required to be erected on land within the potential development area for the Scout Moor II proposals. The monitoring data generated by the proposed met mast will assist in securing funding for the Scout Moor II wind farm from the selected turbine supplier, as well as supporting the construction and future operation of the wind farm.
- 2.5 Two years of wind data are required before construction can begin. To achieve this, Cubico must secure separate planning permission for the temporary met mast in advance of the main Scout Moor II wind farm application. This approach ensures that if planning permission is granted for the Scout Moor II Wind Farm, the project can be delivered by 2030, aligning with the government's Clean Power 2030 ambitions.

The Application Site

- 2.6 The Application Site is located on land at Rooley Moor. Details of the precise location are provided at **Table 2.1** below.

Table 2.1: Met Mast Location

Grid Reference	Latitude	Longitude	Easting	Northing
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² While it is noted that the threshold for electricity generation to be Nationally Significant Infrastructure Projects (NSIPs) is to be increased to 100MW by the end of 2025, an application for full planning permission will be submitted under the Town and Country Planning regime to RBC and Rochdale Metropolitan Borough Council.

³ RBC ref. 2024/0495 and RMBC ref. 24/01241/SCO

SD 85258 19420	53.671043	-2.2246126	385258	419420
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- 2.7 The Application Site comprises an area of open moorland, extending to 0.4422 hectares in area. This location has been chosen for the proposed met mast due to its elevated topography, which increases the accuracy of the monitoring data due to higher wind speeds and conditions.
- 2.8 The Application Site is not subject to any statutory or non-statutory environmental or heritage designations and is located within Flood Zone 1.

The Proposed Met Mast

- 2.9 In summary, the proposals comprise the erection of an 91.65-metre-high tilt-up meteorological mast, which would comprise of a heavy-duty tubular hot dip galvanised steel mast, with a maximum diameter of 219.1mm.
- 2.10 The proposed met mast would be held in place with inner (25m radius) and outer (50m radius) steel rope guy wires using six ground anchoring positions. The anchoring excavations are typically 3m long by 0.75m wide and 2m deep.
- 2.11 The proposals also include:
- Secure boxes attached to the base of the met mast which will contain data logging and telecommunications equipment, as well as the batteries to provide an independent power supply to the met mast and associated equipment.
 - Meteorological instruments mounted on booms extending from the met mast. The equipment installed onto the mast will include wind vanes, atmospheric temperature and pressure monitors, wind speed gauges and data loggers. These will collect data in relation to wind speed and shear at varying heights, the prevailing wind direction and average annual temperature. Data is sent via the datalogger with bespoke designed communications and power supply systems (SIM) meaning that data is gathered remotely. The data collected will enable Cubico to refine its energy yield estimates and, as noted above, will assist in securing funding for the Scout Moor II wind farm from the selected turbine supplier, as well as supporting the construction and future operation of the wind farm.
 - A lightening protection rod would also be attached to the top of the met mast.
 - Ground-mounted photovoltaic modules spread across an area of 13.5m², which will be used to charge the batteries of the monitoring equipment.
 - Stock fencing installed around each of the six ground anchoring positions, comprising 1m high wooden fence posts, placed at 3m intervals and installed to a maximum depth of 1m. The posts would be infilled with wire mesh fencing. Each anchoring position would include a 216m² fenced area.
 - Heras security fencing installed around an area of 1,592.5m² at the base of the proposed met mast. This would comprise 3.2m high spiked wooden posts,

installed to a maximum depth of 1.2m, infilled with 2m high, 3.5m long heras fence panels.

- 2.12 The proposed fencing is intended to protect the proposed met mast and associated infrastructure, enabling the wider moorland to remain publicly assessable in accordance with its status as Countryside and Rights of Way Public Access Land. Rooley Moor Road (bridleway) will be utilised during the installation and decommissioning periods as explained below. No other public rights of way will be affected by the proposed development.
- 2.13 The proposed met mast and associated infrastructure would remain in-situ for a period of up to 36 months.
- 2.14 Detailed information in relation to the erection, commissioning and de-commissioning of the mast is provided in the accompanying Construction Method Statement. This specifically includes measures relating to the protection of peatland, seeking to mitigate as far as possible any impacts.
- 2.15 Access for the purposes of construction and decommissioning of the proposed met mast will be achieved via Rooley Moor Road. Cubico has secured all necessary access rights to use this route for the purposes of installing the proposed met mast only – however, it is important to note that Rooley Moor Road will not be used during the proposed construction of the Scout Moor II Wind Farm, which will instead utilise the existing Scout Road / Scout Moor Quarry Access and existing Scout Moor Wind Farm Access Tracks. Cubico will take all necessary precautions to protect Rooley Moor Road and is committed to undertaking any remedial works should this be necessary.
- 2.16 Construction and decommissioning phase access is summarised as below:
- The proposed infrastructure, as well as all plant and machinery required during construction, will be delivered to the Loading Area at the bottom of Rooley Moor Road on a flatbed lorry.
 - It will then be transported from the Loading Area up to the Unloading Area (adjacent to the Application Site) via Rooley Moor Road on a tractor and trailer.
 - The locations of the Loading Area and Unloading Area are shown on the submitted Transport Access to Mast Site drawing.
- 2.17 The indicative construction/installation programme is summarised below:
- Day 1:
 - A flatbed delivery lorry will arrive at the offsite loading area to deliver the proposed met mast and associated infrastructure, plus a Tracked Dumper and a Tracked Excavator.
 - A tractor and trailer will undertake 5no. two-way trips (i.e. back and forth) from the loading area to the Application Site via Rooley Moor Road to transport the proposed met mast and associated infrastructure.

- A Tracked Dumper and a Tracked Excavator will each undertake 1no. trip from the loading area to the Application Site via Rooley Moor Road and then remain onsite for duration of the construction/installation period.
- 2no. 4x4 vehicles will each undertake 1no. two-way trips from the loading area to the Application Site via Rooley Moor Road to transport the construction/installation team.
- 1no. of these 4x4 vehicles will also tow a trailer mounted welfare unit (3.6m x 2.3m x 2.75m). This will be in-situ adjacent to the Application Site during the construction/installation of the proposed met mast. It will comprise a welfare area, toilet and generator/warm room.
- Day 2:
 - 2no. 4x4 vehicles will each undertake 1no. two-way trips from the loading area to the Application Site via Rooley Moor Road to transport the construction/installation team.
 - A tractor and trailer will undertake 1no. two-way trip from the loading area to the Application Site via Rooley Moor Road to transport the proposed met mast and associated infrastructure.
- Day 3:
 - 2no. 4x4 vehicles will each undertake 1no. two-way trips from the loading area to the Application Site via Rooley Moor Road to transport the construction/installation team.
 - A tractor and trailer will undertake 1no. two-way trip from the loading area to the Application Site via Rooley Moor Road to transport the proposed met mast and associated infrastructure.
- Day 4:
 - 2no. 4x4 vehicles will each undertake 1no. two-way trips from the loading area to the Application Site via Rooley Moor Road to transport the construction/installation team.
 - A tractor and trailer will undertake 1no. two-way trip from the loading area to the Application Site via Rooley Moor Road to transport the proposed met mast and associated infrastructure offsite.
 - A Tracked Dumper and a Tracked Excavator will each undertake 1no. trip from the Application Site to the loading area via Rooley Moor Road to be transported offsite.
 - A flatbed delivery lorry will arrive at the offsite loading area to collect the Tracked Dumper and a Tracked Excavator.

- 2.18 A photographic condition survey of the Application Site and Rooley Moor Road will be undertaken prior to the commencement of any works, and this will inform a post decommissioning restoration scheme, which can be secured via planning condition.

3. Relevant Planning Policy Context

- 3.1 In line with planning law⁴, planning applications should be determined in accordance with the adopted Development Plan, unless material considerations indicate otherwise.
- 3.2 This section identifies the key national and local planning policy tests against which the merits of the proposed met mast must be appraised, including those set out in the adopted Development Plan.
- 3.3 A detailed summary of all relevant policies is set out at **Appendix 2**. The following represents a summary and draws out the key considerations.

The Development Plan

- 3.4 The Application Site is located within the administrative boundary of Rossendale Borough Council ('RBC').
- 3.5 The adopted Development Plan comprises:
- Rossendale Local Plan 2019 to 2036 (adopted 15 December 2021) ('RLP').
 - Joint Lancashire Minerals and Waste Development Framework Core Strategy DPD (adopted March 2009) ('Lancashire Minerals & Waste CS').
 - Joint Lancashire Minerals and Waste Local Plan Site Allocation and Development Management Policies (adopted September 2013) ('Lancashire Minerals & Waste SADMP').

Vision and Strategic Objectives

- 3.6 The RLP sets out the Vision which envisages that the Borough will be a place where people want to live, visit, work and invest. Rossendale's distinctive landscapes and natural assets will continue to be protected and enhanced for their intrinsic value to biodiversity and tackling climate change as well as their recreational and economic value to local people and visitors alike.
- 3.7 This Vision is supported by a number of Objectives and Strategic Priorities, both of which recognise the importance of green and renewable energy projects as part of the solution to reducing the impact of climate change.

Strategic Policies

- 3.8 RLP Policy SD1 (Presumption in favour of Sustainable Development) states that, when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

⁴ Section 38A of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004

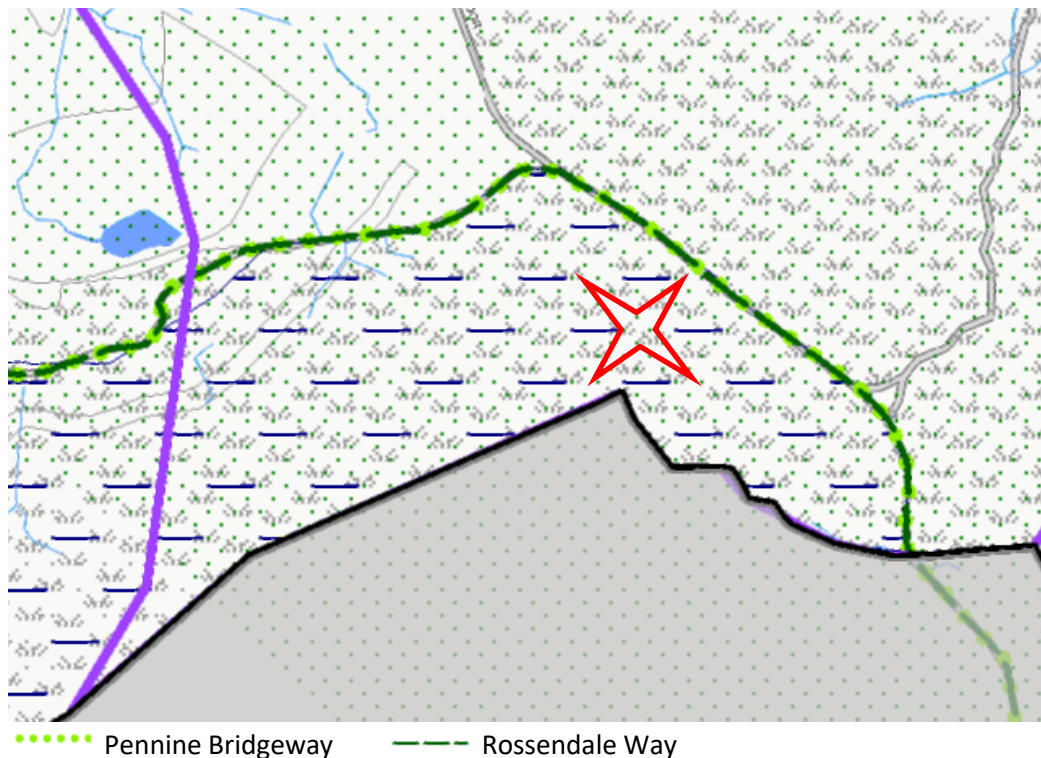
- 3.9 RLP Policy SD2 (Urban Boundary and Green Belt) requires all new development in the Borough to be taken place within the Urban Boundaries, except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area.

Site-Specific Policy Designations

- 3.10 The Application Site is subject to the following site-specific policy designations, as defined by the RLP Policies Map – an extract of which is shown within **Figure 3.1**:

- High Moorland Plateau Suitable Areas for Wind Turbines: 
- Biological Heritage Site: 
- Green Infrastructure: 
- Minerals Safeguarding Area: 
- Bacup & Stacksteads Neighbourhood Area: 

Figure 3.1: Extract of RLP Policy Map with redline boundary



- 3.11 It is important to note that the Application Site is not located on Common Land or within the Green Belt.

High Moorland Plateau Suitable Areas for Wind Turbines

- 3.12 RLP Policy ENV7 (Wind Turbines) confirms that areas suitable for commercial wind turbines are identified on the Policies Map, which includes the high moorland plateau,

provided that areas of deep peat (over 40cm depth) and blanket bog are avoided. This policy also sets out a series of specific requirements which should be considered in relation to proposals for new wind farms and individual turbines within the defined areas – for the sake of brevity these are not repeated here but are set out in full at **Appendix 2** and considered in the appraisal of the scheme in the following section of this Planning Statement.

Biological Heritage Site

3.13 RLP Policy ENV4 (Biodiversity, Geodiversity and Ecological Networks) confirms that development proposals that have potential to affect a national or locally-designated site, as shown on the Policies Map and its immediate environs, or on protected habitats or species, will be expected to be accompanied by relevant surveys and assessments detailing likely impacts. Full details of this policy are summarised at **Appendix 2** and the proposed met mast is appraised against it in the following section of this Planning Statement.

Green Infrastructure

3.14 RLP Policy ENV5 (Green Infrastructure Networks) confirms that development proposals will be expected to support the protection, management, enhancement and connection of the green infrastructure network, as identified on the Policies Map. Development proposals should seek first to avoid or, if not feasible, mitigate biodiversity impacts on-site. Schemes which would result in a net loss of green infrastructure on-site will only be permitted if:

- The function and connectivity of green infrastructure networks are retained or replaced; or
- The development scheme integrates new or enhanced green infrastructure where appropriate, such as natural greenspace and trees; and in all cases
- The proposal would not have an unacceptable impact on amenity, surface water or nature conservation.

Minerals Safeguarding Area

3.15 The Application Site is located within a minerals safeguarding area – full details of the relevant policies are set out in **Appendix 2** and the proposed met mast is appraised against these in the following section of this Planning Statement.

Bacup & Stacksteads Neighbourhood Area

3.16 The Application Site is located within the Bacup & Stacksteads Neighbourhood Area. However, at this time a Neighbourhood Plan has not been adopted for this area and therefore there are no adopted policies applicable to this designation.

Development Management Policies

3.17 The Adopted Development Plan also includes development management policies relevant to the proposals and consideration of the application, which are summarised at **Appendix 2**.

Other Material Considerations

3.18 Documents that are capable of being ‘other material considerations’ in the determination of this planning application include:

- The National Planning Policy Framework (adopted December 2024) (‘the Framework’) and associated Planning Practice Guidance (‘PPG’)
- Adopted Supplementary Planning Documents (‘SPD’) and Guidance (‘SPG’), including:
 - Climate Change SPD (dated November 2022)

The Framework and PPG

3.19 The Framework sets out the Government’s planning policies for England and how these are expected to be applied. The PPG also provides relevant guidance and is referred to within the following analysis and in other supporting reports where applicable.

3.20 Extensive parts of the Framework are of relevance and for the sake of brevity are not recited in full here but are summarised at **Appendix 2** and referred to in reaching conclusions in the following section of this Statement.

Supplementary Planning Documents

3.21 As set out above, there are a number of adopted and emerging SPDs of relevance to the Proposed Scheme. These are summarised in **Appendix 2** and considered as part of the appraisal of the proposed met mast in the following section of this Planning Statement.

4. Planning Appraisal

Principle of Development

- 4.1 Paragraph 161 of the Framework confirms that the planning system should, inter alia, “support the transition to net zero by 2050” and “support renewable and low carbon energy and associated infrastructure” (emphasis added).
- 4.2 Paragraph 168 of the Framework confirms that “when determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should: ... a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal’s contribution to a net zero future” (emphasis added).
- 4.3 On this basis, the proposed met mast, as ‘ancillary infrastructure’ for a future renewable energy scheme (i.e. Scout Moor II), benefits from in-principal support from the Framework.
- 4.4 It is self-evident that the proposed met mast will allow Cubico to collate up-to-date information in relation to the meteorological conditions at the site. This data will be used to enhance Cubico’s knowledge of the site and inform future decisions in relation to the Scout Moor II proposals. In this respect it can be said that the deployment of the proposed met mast is crucial to the deployment of wind energy development in the borough, which is supported in this location in accordance with RLP Policy ENV7 (Wind Turbines).
- 4.5 In the circumstance it can be said that the proposed met mast is supportive of national and local planning policies for the deployment of renewable and local carbon technologies, and their associated infrastructure, as set out in the Framework and RLP Policy ENV7 which makes clear that the Council will give positive consideration to all wind energy proposals, including ancillary equipment, in this location subject to detailed considerations.
- 4.6 The scheme is assessed against the detailed requirements of RLP Policy ENV7, as well as all other relevant development management policies and other material considerations, below.

Environment & Amenity

- 4.7 This Section considers all other matters considered material to the planning balance. The technical documents which are submitted alongside the application have assessed the impact of the Proposed Scheme in respect of all relevant technical and environmental issues. The content and findings of these assessments is summarised in **Table 4.1** below, in the context of relevant policies of the Development Plan and other material considerations as summarised in Section 3 and set out in detail at **Appendix 2**.

Table 4.1: Appraisal against development management and environmental policies

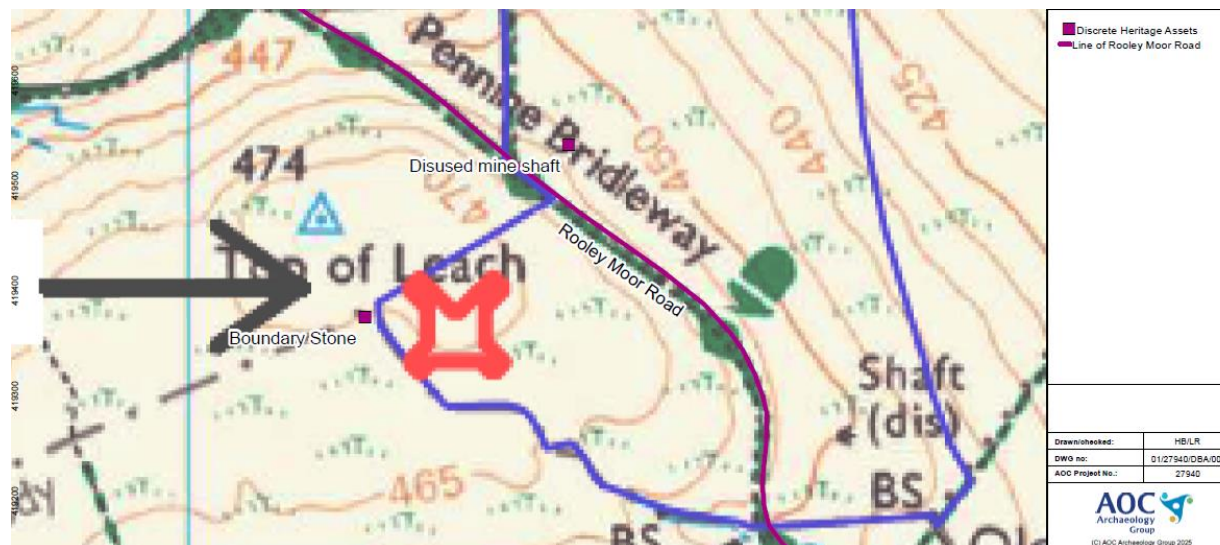
Topic	Assessment
Landscape Character & Visual Impact	The proposed met mast will inevitably be visible from some locations in the surrounding area. However, it is considered that its slender nature (maximum of 219.1mm in diameter) and colouration would not unduly draw the eye. The impact on landscape character and visual amenity would be extremely limited and unavoidable. Furthermore, it is material to the determination of the application that the proposed met mast will be viewed within the context of the existing turbines on the adjacent SMWF. They will therefore be an expected and ancillary structure associated within the existing windfarm setting and publicly known proposals for Scout Moor II. The met mast is only proposed for a temporary period of up to 36 months, meaning that there will be no long-term impacts. Upon decommissioning, the site will be fully restored (refer to Construction Method Statement for details). On the basis of the above, it is considered that the proposals accord with RLP Strategic Policies ENV3 (Landscape Character and Quality) and ENV2 (Historic Environment) and RLP Policy ENV7 (Wind Turbines), as well as Paragraphs 180 and 203(c) of the Framework in respect of landscape and visual impact.
Built Heritage	On the basis of a review of DEFRA's Magic Map database and the National Heritage List for England, there are no World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Battlefields or Registered Parks and Gardens within the Application Site boundary. The closest designated heritage asset is a Grade II listed building (Old Farmhouse circa 50 metres south-west of Present Cowpe Hall Farmhouse (NHLE List Entry No.1361999), which is located c. 1.6km to the north-west of the Application Site. The Framework and Historic England guidance require consideration of the impacts of development upon the significance of heritage assets, rather than just considering whether a development will be visible from them, although this is also a consideration. The mast would be temporary in nature and its narrow form means it would have a limited visual presence. Although the mast would theoretically be visible from and in combination with a number of designated and non-designated heritage assets within the wider surroundings, it is considered unlikely that their significance would be affected.

Topic	Assessment
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On the basis of the above, it is considered that the proposals accord with RLP Strategic Policies ENV2 (Historic Environment) and ENV1 (High Quality Development in the Borough) and RLP Policy ENV7 (Wind Turbines), as well as the Framework (Chapter 16) with regard to Built Heritage.

Archaeology Groundworks and plant movement required for construction activities have the potential to result in disturbance to known and hitherto unknown archaeological remains.

The closest known archaeological asset is a boundary stone marked on the 1851 Ordnance Survey map (Lancashire Sheet LXXX) and currently lying prone within an area of rough grass and partially overgrown with sphagnum moss vegetation. The stone is located approximately 40 metres west of the Application Site. The location of the stone and an area 5 metres around it will be fenced off prior to and throughout the construction period to prevent any inadvertent damage.



Rooley Moor Road will be used by construction vehicles to access the Application Site. The vehicles are not expected to cause any damage to the road surface or associated underlying remains. However, a photographic survey of the road condition will be undertaken prior to the commencement of any works, and this will inform a post decommissioning restoration scheme (if required).

On the basis of the above, it is considered that the proposals accord with RLP Strategic Policies ENV2 (Historic Environment) and ENV1 (High Quality Development in the Borough) and RLP Policy ENV7 (Wind Turbines), as well as the Framework (Chapter 16) with regard to Archaeology.

Biodiversity & Ecology

A Preliminary Ecological Appraisal has been prepared by Atmos Consulting to support the Application. It confirms:

- As the Application Site is less than 25m² in area, it is exempt from requiring any Biodiversity Net Gain (BNG) calculations under the 'de minimis' exemption. On this basis statutory BNG is not required.
 - The habitats on the Application Site are comprised of degraded blanket bog, recorded as being in poor condition. There are no anticipated habitat losses proposed during the works as the works themselves are to be relatively low in intensity, with only minimal digging occurring to install the guy lines for the mast. The area of excavated ground will be approximately 2.5 to 3m deep and 0.8m in width to accommodate railway sleepers that will anchor the guy lines to the main mast structure.
 - The proposed met mast is not anticipated to have a negative impact on the ability of any statutory designated sites or non-statutory designated sites to expand, as no habitats are proposed to be lost as part of the works.
 - A series of 'Good Practice Construction Measures' are proposed to be implemented so as to safeguard any potentially ranging protected species and reduce noise, avoid pollution and dust production during installation, including:
 - Heras fencing to be installed to prevent encroachment onto other habitats.
 - Any excavations are to be covered overnight or have an exit plank installed so as to avoid any protected species including badger, otter and water vole becoming trapped.
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Topic	Assessment
	– An Ecological Clerks of Work (ECoW) will be present on Site during the construction phase in order to monitor the impact on the peat. Additionally, bog mats are able to be utilised to further prevent damage on the surface and are to be removed once they are no longer needed in order to ensure no lasting damage to the surface level vegetation. – During the installation of the guy lines, the excavated peat is to be removed carefully in turfs approximately 1m in length by an excavator and set aside whilst the sleeper bases are inserted. In order to minimise handling, the excavated material should be placed back into the ground immediately once the sleepers are inserted. These may require watering if there is a gap between excavation and placing back into the ground. This should be avoided where possible. The turf excavation process will be supervised by the ECoW. The turfs are to be placed on impervious material to reduce water losses and are to be placed back into the excavations in situ, vegetation side up, in order to ensure that no peat is lost during the works. Any layers of catotelmic peat is to be placed back in first, with acrotelm turves placed on top, which will be supervised by the ECoW. The areas of excavation are minimal in nature, and will not result in losses of peat habitat, as no peat is to be removed off Site. – Additionally, it is recommended that untreated railway sleepers are utilised for the anchor points, so as to avoid introducing any chemicals into the environment. – In order to further ensure the safety of passing bird species, bird line markers are suggested to be implemented along the guy lines of the met mast to prevent bird collisions. – Prior to construction commencing within the nesting season (March to August; inclusive), an ecological walkover of the Application Site shall be completed by an experienced ecologist and ornithologist each day work is proposed in order to check for any signs of nesting birds or reptiles within the Application Site area, and within a suitable buffer zone of the mast location.

The above measures can be secured by suitably worded planning conditions as required.

On the basis of the above, it is considered that the proposals accord with RLP Policies ENV4 (Biodiversity, Geodiversity and Ecological Networks) and ENV7 (Wind Turbines) and RLP Strategic Policy ENV1 (High Quality Development in the Borough), as well as Paragraphs 187(d) and 193 of the Framework, in respect of Biodiversity and Ecology.

Topic	Assessment
Peatland	Peat is a valuable natural resource supporting key habitats and represents an important store of sequestered carbon. RLP Policy EN7 (Wind Turbines) seeks to ensure that wind energy proposals would not adversely affect the integrity of areas of deep peat (over 40cm in depth). As outlined in the accompanying Construction Method Statement, the siting of the proposed met mast has been carefully selected in order to avoid areas of deep peat (i.e. areas with an organic rich upper horizon deeper than 0.4 metres). The installation, operation and subsequent removal of the mast will not, therefore, have any direct impact on deep peat. To avoid any indirect impacts, a range of mitigation measures are proposed, as follows: • The siting of the mast has been selected to ensure that areas of deep peat are avoided. • The number of machine traverses across the site during the construction and decommissioning phases will be minimised. • Access over areas of deep peat during the construction and de-commissioning phases, as well as monitoring / data collection visits, will be restricted. In the above ways, the proposed mast will ensure the integrity of areas of deep peat in accordance with RLP Policy EN7 (Wind Turbines).
Access & Transport	In accordance with RLP Policy ENV7 (Wind Turbines) the submission contains a Construction Management Plan, which sets out the approach to construction and decommissioning phase vehicle access and movements, and mitigation for other users. On this basis, it is considered that the proposals accord with RLP Policy TR2 (Footpaths, Cycleways and Bridleway), as well as RLP Policy ENV7 (Wind Turbines) in this respect.
Minerals	The Application Site is located within a Minerals Safeguarding Area. The proposed met mast is intended to be in place for a temporary period of up to 36 months and will not sterilise or prevent the future extraction of minerals in this location.

Topic	Assessment
	On the basis of the above, it is considered that the proposals accord with Lancashire Minerals & Waste CS Policies CS1 (Safeguarding Lancashire's Mineral Resources) and CS2 (Minimising the need for Mineral Extraction), Lancashire Minerals & Waste SADMP Policy M2 (Safeguarding Minerals), as well as Paragraphs 217-218 of the Framework and the Minerals PPG.
Aviation Safeguarding	Advice on the requirement for aviation lighting to be fitted to the mast has been sought from Egis Group, aviation specialists. Egis has confirmed that neither the Ministry of Defence (MoD) nor the Civil Aviation Authority (CAA) is likely to request aviation lighting to be fitted as: • The proposed met mast is located within the MoD-designated Bolton Southport Transit area which restricts military aircraft to a minimum of 1,000ft above the ground except for light helicopters and light propeller aircraft. These aircraft must not be flown closer than 500ft to any person, vessel, vehicle or structure; additionally at night this is further restricted by requiring that they must be flown at a height of more than 500ft above ground level. • The CAA only specify lighting on structures greater than 500 ft (152 metres) above ground level for obstacles not in the vicinity of aerodromes – the proposed met mast is only 91.65m in height. • Police and Air Ambulance (HEMS) helicopters operate at safe altitudes at night that will be well above the height of the met mast especially in hilly terrain. It is for the above reasons that the existing wind turbines at Scout Moor, which are 100 metres blade-to-tip, are not lit. On the basis of the above, it is considered that the proposed met mast accords with RLP Policy ENV7 (Wind Turbines) and the Renewable and Low Carbon Energy PPG.
Security & Crime	The proposed met mast will be secured via heras fencing, as set out in Section 2, to prevent unauthorised access to the equipment. A security guard will be present during the construction and decommissioning works, between the hours of 16:30 – 09:30, when the met mast installation team are off-site, to ensure safety and security.

Topic	Assessment
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On the basis of the above, it is considered that the proposals accord with RLP Strategic Policy ENV1 (High Quality Development in the Borough), as well as Paragraphs 96b and 135f of the Framework.
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Summary

- 4.8 The proposed met mast has been appraised against relevant policies of the adopted Development Plan and other material considerations, including the prevailing policies of the Framework.
- 4.9 Overall, the proposal responds positively to this policy context and no conflict arises.

5. Summary & Conclusions

- 5.1 This Statement accompanies a full planning application for the erection of a temporary meteorological mast (“met mast”) on land at Rooley Moor.
- 5.2 Cubico is investigating the potential to construct additional turbines adjacent to the existing SMWF. In order to further inform the assessment of prevailing environmental conditions, a met mast is required to be erected on land within the potential development area for the Scout Moor II proposals. The monitoring data generated by the proposed met mast will assist in securing funding for the Scout Moor II wind farm from the selected turbine supplier, as well as supporting the construction and future operation of the wind farm.
- 5.3 The proposed met mast will be erected for a period of up to 36 months and will be used to gather up-to-date wind data.
- 5.4 It has been demonstrated at Chapter 4 that the proposed met mast complies with relevant proposals of the Development Plan. There are no other material considerations or adverse impacts which demonstrably outweigh the benefits which flow from the development. In accordance with Paragraph 11 of the Framework, planning permission should be granted without delay.

Appendix 1: Application Documents

The full range of plans / drawings and documentation which is submitted by the Applicant – and which will assist RBC in its consideration and determination of the application – is set out in the following tables.

Table A1.1 List of submitted plans / drawings

Drawing / Plan Title	Author
Figure 1 – Site Location Plan (V1c)	Dulas
Figure 2 – Layout Plan (V1d)	Dulas
Figure 3 – Indicative Mast Elevation (V2a)	Dulas
Figure 4 – Mast Plan View (V1a)	Dulas
Figure 5 – Transport Access to the Site (V1e)	Dulas
Figure 6 – Heras Security Fence (V1c)	Dulas
Figure 7 – Stock Fence (V1b)	Dulas
Figure 8 – Welfare Unit (V1b)	Dulas

Table A1.2 List of submitted documents & reports

Document Title	Author
Planning Statement	Turley
Construction Method Statement (V5)	Dulas
Preliminary Ecological Appraisal (8706 R8 Rev1)	Atmos Consulting

Appendix 2: Summary of Relevant Planning Policy and Other Material Considerations

Wind Farm Development

Adopted Development Plan

1. RLP Policy EN7 (Wind Turbines) sets out the following criteria to be addressed to the satisfaction of RBC in assessing proposals for wind farms and associated infrastructure:
 - The impacts identified by the local community have been taken into account and fully addressed;
 - The scale, height and siting of the turbine(s) and all supporting information is appropriate to the area taking into account;
 - The vertical height and horizontal expanse of the topography;
 - The degree of openness of the landscape;
 - The scale of adjacent landscape features, buildings and walls;
 - The proximity to designated and non-designated built heritage assets;
 - The proximity to distinctive landforms, such as a ridgeline, knoll or rock outcrop, which makes a key contribution to local landscape character;
 - The presence of existing settlement or field patterns; and
 - The opportunities to screen or reduce the visual impact of the development
 - It would not result in the loss of, or significantly detract from, key views of scenic landmarks or landscape features;
 - The design, colour, layout and arrangement of turbines are appropriate to their setting;
 - The proposal would not result in unacceptable visual clutter in combination with other existing structures, with cumulative impacts fully assessed to the satisfaction of the Council;
 - There would be no unacceptable harm to neighbour amenity, protected species or the use of public rights of way or bridleways or a severe impact on highway safety;
 - Shadow and Reflective Flicker impacts on buildings and Public Rights of Way are fully assessed with a precautionary approach taken to mitigation;

- The scheme would not result in unacceptable noise impacts, including amplitude modulation, on residential properties and other sensitive users;
- The impact on geology, including former mine workings, peat and hydrogeology is fully appraised and issues identified addressed, including restoration plans as appropriate;
- No development is proposed on areas of peat of over 40cm depth;
- Impacts on designated species and ecological assets are avoided or minimised;
- The proposal does not cause unacceptable harm to any heritage assets and their setting;
- The impact on recreational assets is assessed and impacts on key routes such as the Pennine Bridleway and Rossendale Way are avoided or if this is not possible, mitigated;
- The scale, siting and design of any ancillary structures and access tracks are appropriate to the character of the area and the landscape setting;
- The submission contains a Construction Management Plan, including impacts on the Highway network, and incorporates proposals for managing the de-commissioning and removal of the turbines and the restoration of the site;
- Any landscape features removed or altered to enable the erection of the turbine are reinstated and the design, materials and scale of any new fencing or walling needed is appropriate to the character of the local area;
- Issues with respect to the following are appropriately addressed to the satisfaction of the Local Planning Authority:
 - Shadow and reflective flicker;
 - TV and phone reception;
 - Air traffic radar reception; and
- A de-commissioning scheme is included.

Landscape Character and Visual Impact

Adopted Development Plan

2. RLP Strategic Policy ENV2 (Historic Environment) support proposals which conserve or, where appropriate, enhance the historic environment of Rossendale. Particular consideration will be given to ensure that the significance of those elements of the historic environment which contribute most to the Borough's distinctive identity and sense of place are not harmed, including the historic landscape. The historic landscape of the Borough should be protected and any proposals which would impact on its qualities or functions will be assessed according to policy ENV3 (Landscape Character and Quality).

3. RLP Strategic Policy ENV3 (Landscape Character and Quality) states that the distinctive landscape character of Rossendale, including large scale sweeping moorlands, will be protected and enhanced. The Council will expect development proposals to conserve and, where possible, enhance the natural and built environment, its immediate and wider environment, and take opportunities for improving the distinctive qualities of the area and the way it functions. In order to protect and enhance the character and quality of the landscape, development proposals should, where appropriate:
- Respond positively to the visual inter-relationship between the settlements and the surrounding hillsides and follow the contours of the site;
 - Not have an unacceptable impact on skylines and roofscapes;
 - Be built to a density which respects the character of the surrounding area with only low density development likely to be acceptable in areas abutting the Enclosed Upland or Moorland Fringe Landscape Character Areas;
 - Retain existing watercourses, trees and green infrastructure features that make a positive contribution to the character of the area;
 - Take into account views into and from the site and surrounding area, retaining and, where possible, enhancing key views.

Other Material Considerations

National Planning Policy Framework

4. The Framework includes various policies and requirements in respect of landscape and visual impact associated with new development. In particular:
- Paragraph 180 states that the planning system should contribute to and enhance the natural and local environment, including by protecting and enhancing valued landscapes.
 - Paragraph 203(c) also highlights that local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness.

Built Heritage

Adopted Development Plan

5. RLP Strategic Policy ENV1 (High Quality Development in the Borough) expects new development in the Borough to take account of the character and appearance of the local area, including, safeguarding and enhancing the built and historic environment.
6. RLP Strategic Policy ENV2 (Historic Environment) supports proposals which conserve or, where appropriate, enhance the historic environment of Rossendale. Particular consideration will be given to ensure that the significance of those elements of the historic environment which contribute most to the Borough's distinctive identity and sense of place are not harmed. These include:

- The infrastructure associated with the Borough's mining and quarrying heritage;
 - The network of historic open spaces, parks, gardens, and cemeteries.
7. Proposals affecting a designated heritage asset should conserve those elements which contribute to its significance. Less than substantial harm to such elements will be permitted only where this is clearly justified and outweighed by the public benefits of the proposal. Substantial harm or total loss to the significance of a designated heritage asset will be permitted only in exceptional circumstances. Where permission is granted for a development which would result in the partial or total loss of a designated heritage asset, approval will be conditional upon the asset being fully recorded and the information deposited with the Historic Environment Record (HER).
 8. Proposals which would remove, harm or undermine the significance of a non-designated heritage asset will only be permitted where the benefits are considered sufficient to outweigh the harm.
 9. Proposals within or affecting the setting of a conservation area will only be permitted where it preserves or enhances the character and appearance of the area, including those elements which have been identified within the conservation area appraisal as making a positive contribution to the significance of that area.
 10. All applications which affect a heritage asset should be accompanied by a Statement of Significance which may form part of a Design and Access statement and/or a Heritage Impact Assessment. This should provide the information necessary to assess the impact of the proposals on the heritage asset and its setting, demonstrating how the proposal has taken into account the elements that contribute to its significance including, where relevant, its architectural and historic interest, character and appearance.

Other Material Considerations

National Planning Policy Framework

11. Section 16 of the Framework considers the historic environment and states at paragraph 207 that, inter alia:
 - Local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance;
 - As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary; and
 - Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

12. Paragraph 208 of the Framework confirms that LPA's should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Archaeology

Adopted Development Plan

13. RLP Strategic Policy ENV2 (Historic Environment) states that proposals affecting an archaeological site of national importance should conserve those elements which contribute to its significance. Less than substantial harm to such elements will be permitted only where this is clearly justified and outweighed by the public benefits of the proposal. Substantial harm or total loss to the significance of an archaeological site of national importance will be permitted only in exceptional circumstances. Where permission is granted for a development which would result in the partial or total loss of a designated heritage asset, approval will be conditional upon the asset being fully recorded and the information deposited with the Historic Environment Record (HER).
14. Where the proposal affects (non-designated) archaeological sites of less than national importance it should conserve those elements which contribute to their significance in line with the importance of the remains. In those cases where development affecting such sites is acceptable in principle, mitigation of damage will be ensured through the preservation of the remains in situ as a preferred solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording before or during development, the findings of which should be deposited with the Historic Environment Record.

Other Material Considerations

National Planning Policy Framework

15. Paragraph 200 states that "where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."

Ecology & Biodiversity

Adopted Development Plan

16. RLP Strategic Policy ENV1 (High Quality Development in the Borough) expects new development in the Borough to take account of the character and appearance of the local area, including, as appropriate, there should be no adverse impact to the natural environment, biodiversity and green infrastructure unless suitable mitigation measures are proposed and the Council will seek biodiversity net gain consistent with the current national policy.
17. RLP Policy ENV4 (Biodiversity, Geodiversity and Ecological Networks) confirms that development proposals with the potential to affect a national or locally-designated site, or on protected habitats or species, will be expected to be accompanied by

relevant surveys and assessments detailing likely impacts. A sequential approach should be followed to avoid harm and where possible enhance biodiversity, and where not possible, provide appropriate mitigation and, as a last resort, on and off-site compensatory measures to offset the impact of development. Development proposals should protect areas of biodiversity and protected species; areas of geodiversity and ecological networks, and where possible enhance sites and linkages. Any adverse effects should be first of all avoided; if this is not possible, minimised and mitigated against, and where this cannot be achieved, compensated for. All development proposals should seek to protect and enhance biodiversity, and will be requested to quantify any net gains.

Other Material Considerations

National Planning Policy Framework

18. Paragraph 187(d) of the Framework requires planning decisions to contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity.
19. Paragraph 193 of the Framework states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:
 - If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
 - Opportunities to incorporate biodiversity in and around development should be encouraged; and
 - Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless there are wholly exceptional reasons for its loss and a suitable compensation strategy exists.

Access and Transport

Adopted Development Plan

20. RLP Policy TR2 (Footpaths, Cycleways and Bridleway) supports the development and enhancement of a strategic Public Rights of Way network including enhancements to surfacing, signage, supporting facilities, and feeder routes. Key routes includes Pennine Bridleway. Proposals to improve, extend or add to the existing footpath, cycleway and bridleway network in the Borough and in new development will be supported providing they:
 - Are integrated with existing routes to facilitate access on foot, by bicycle and by horse;

- Where appropriate, identify gaps in the existing network and map potential new link routes, particularly in areas where there is a high level of demand;
- Facilitate access to the network of footpaths, bridleways and cycleways by requiring new development adjacent to existing pedestrian, bridleway or cycle routes to provide direct, safe and secure links to these routes where possible.
- Do not harm residential amenities;
- Do not harm nature conservation interests;
- Take into account the needs of agriculture;
- Are located and designed to minimise the risk of crime;
- Have regard to the needs of people with impaired mobility;
- Have regard to other users of the route and vehicular traffic; and
- The development would not reduce, sever or adversely affect the use, amenity or safety of a Public Right of Way (PROW), or prejudice the planned development of the network, if acceptable provision is made to mitigate those effects, or divert or replace the right of way before the development commences. Any replacement or diverted PROW must be no less convenient or safe, and of no lower quality than the facility being replaced; where developments are directly related to the PROW network contributions may be sought for their enhancement.

Other Material Considerations

National Planning Policy Framework

21. Paragraph 109 of the Framework requires that transport issues are considered from the earliest stage of development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places.
22. Paragraph 115 confirms that in assessing specific applications for development it should be ensured that, inter alia:
 - sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;
 - safe and suitable access to the site can be achieved for all users; and
 - any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.
23. Paragraph 116 confirms that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios

Minerals

Adopted Development Plan

24. Lancashire Minerals & Waste CS Policy CS1 (Safeguarding Lancashire's Mineral Resources) states that Lancashire's mineral resources will be identified and conserved, where they have an economic, environmental or heritage value. Mineral resources with the potential for extraction now or in the future will be identified as Mineral Safeguarding Areas and protected from permanent sterilisation by other development.
25. Lancashire Minerals & Waste CS Policy CS2 (Minimising the need for Mineral Extraction) expects all new development to maximise the use of recycled and secondary materials by including measures to reduce, reuse, recycle and recover the waste they produce during construction and demolition, where possible on-site; maximise the use of recycled and secondary materials, and the reuse of other building materials, within the development.
26. Lancashire Minerals & Waste SADMP Policy M2 (Safeguarding Minerals) confirms that within the mineral safeguarding areas identified, planning permission will not be supported for any form of development that is incompatible by reason of scale, proximity and permanence with working the minerals, unless the applicant can demonstrate to the satisfaction of the local planning authority that:
 - The mineral concerned is no longer of any value or has been fully extracted.
 - The full extent of the mineral can be extracted satisfactorily prior to the incompatible development taking place.
 - The incompatible development is of a temporary nature and can be completed and the site returned to its original condition prior to the minerals being worked.
 - There is an overarching need for the incompatible development that outweighs the need to avoid the sterilisation of the mineral resource.

Other Material Considerations

National Planning Policy Framework

27. Paragraph 217 of the Framework clarify that, when determining planning applications, great weight should be given to the benefits of mineral extraction. In considering proposals for mineral extraction, minerals planning authorities should ensure that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality.
28. Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working (Paragraph 218).

Minerals Planning Practice Guidance

29. This PPG provides guidance on the planning for mineral extraction in plan making and the application process. It explains that because minerals are a non-renewable

resource, minerals safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance (Paragraph 002). When Local Planning Authorities determining planning applications, they have an important role in safeguarding minerals by doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction (Paragraph 005).

Aviation Safeguarding

Adopted Development Plan

30. RLP Policy ENV7 (Wind Turbines) states that commercial proposals for new wind turbines outside these areas should demonstrate that the criteria used for designating these areas have been fully addressed in their proposals, including issues with respect to the air traffic radar reception are appropriately addressed to the satisfaction of the LPA.

Other Material Considerations

Renewable and Low Carbon Energy Planning Practice Guidance

31. Paragraph 016 of this PPG states that safety maybe an issue in certain circumstances when assessing wind turbine applications. But these risks can often be mitigated through appropriate siting and consultation with affected bodies, including:
- **Air traffic and safety** - There is a 15 km consultation zone and 30km or 32km advisory zone around every civilian air traffic radar, although objections can be raised to developments that lie beyond the 32km advisory zone. There is a c.15km statutory safeguarding consultation zone around Ministry of Defence aerodromes within which wind turbine proposals would be assessed for physical obstruction⁵.
 - **Defence** - Wind turbines can adversely affect a number of Ministry Of Defence operations including radars, seismological recording equipment, communications facilities, naval operations and low flying. Developers and local planning authorities should consult with the Ministry of Defence if a proposed turbine is 11 metres (m) to blade tip or taller, and/or has a rotor diameter of 2m or more.
 - **Radar** - In addition to air traffic radar, wind turbines may affect other radar installations such as weather radar operated by the Meteorological Office.

Safety, Security & Crime

Adopted Development Plan

32. RLP Strategic Policy ENV1 (High Quality Development in the Borough) expects new development in the Borough to take account of the character and appearance of the
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local area, including, as appropriate, minimising opportunity for crime and malicious threats, and maximising natural surveillance and personal and public safety.

Other Material Considerations

National Planning Policy Framework

33. The Framework includes various policies and requirements in respect of crime, safety and security associated with new development. In particular:
- Paragraph 96b confirms that planning decisions should aim to achieve places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion.
 - Paragraph 135f confirms that planning decisions should create places that are safe, inclusive and accessible.

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