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Rossendale Borough Council and

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RE: 2024/0495 | ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING OPINION | SCOUT MOOR GINCROFT LANE, EDENFIELD, BURY, LANCASHIRE.

AND

24/01241/SCO | SCOPING OPINION IN RESPECT OF THE ERECTION OF UP TO 21 WIND TURBINES UP TO 180M IN HEIGHT WITH A GENERATING CAPACITY OF 100MW3 WITH ASSOCIATED INFRASTRUCTURE AND ACCESS, INCLUDING RESTORATION AND ENHANCEMENT OF DEGRADED PEAT MOORLAND | LAND AT ROOLEY MOOR, ROCHDALE.

Thank you for consulting the Ecology Unit on the above requests for a Scoping Opinion. I have the following comments relating to the proposed Ecology assessment.

Impact on Designated Sites

The Scoping Report prepared by the applicant does not appear to mention the West Pennine Moors SSSI, although the development could be considered to be within the zone of influence for this SSSI (within 2.5 km). This SSSI has in part been designated because it supports important populations of upland breeding birds which could be affected by the proposals. It's presence and the potential impacts of the scheme on this SSSI should be fully considered in the EIA.

Although the Scoping Report has identified the presence of Local Wildlife Sites within the zone of influence of the scheme, I would not consider that currently the importance of these locally designated sites has been given appropriate emphasis within the Report.

For example, Para 9.2 of the Report states –

“A majority of these sites are of geological significance and are focused 2km from the lower levels of the Assessment Boundary, but a segment of Knowl Moor SBI lies within the Assessment Boundary and is designated for blanket bog habitats and upland bird importance”.

In fact, large areas of a number of Local Wildlife Sites, including Knowl Moor SBI, Scout Moor BHS and Cowpe Moss and Brandwood Moor BHS, are within the application site boundary. These very large Local Wildlife Sites support important upland habitats and notable upland bird populations, and impacts on the special nature conservation value of these sites must be fully considered in the EIA.

Impact on Peat

The applicant’s Scoping Report describes the peat resource within the application site as ‘degraded’. Although this may be true, in fact the majority of peat in England could be described as degraded in some way; the situation is not unusual, and this description should not be taken to mean that the peat resource within this application site is not important. It is.

As well as being an important carbon store, peat substrates can support important habitats which are capable of sequestering further carbon from the atmosphere. In this location, the peat is key to supporting notable upland habitats and associated upland bird communities.

The commitment by the applicant to avoid damage to peat where possible, to manage peat appropriately during any construction works, and to restore peat and peatland habitats across the site, is welcomed. But the applicant should be aware that –

- The Common Land status of part of the site may compromise peat restoration efforts. It is stated that all the turbine and access track infrastructure within Common Land will be de-registered to allow for construction of the scheme, but a wider area of land will be needed to secure large-scale peatland habitat restoration, and restoration efforts will very likely require access restrictions and restrictions of grazing rights if restoration is to be successful. If this constraint cannot be overcome, the applicant may need to consider off-site peatland restoration.
- It can be difficult to excavate peat of any depth, store it appropriately and re-use it without leading to overall ecosystem degradation. Wherever possible, the scheme should therefore aim to avoid impacts on peat. Where impacts on peat are unavoidable, any proposals to excavate peat must consider the holistic effects of this action on the peat resources across the Moor, and the potential for excavation to mobilise peat deposits distant from the excavation site.
- It was notable during the construction of the existing Scout Moor Wind Farm that the very bad weather experienced during the construction phase made the excavation, storage and restoration of peat difficult. Any CEMP prepared to inform peat management efforts must fully take into account the local climatic conditions which can be experienced on the Moors, including more extreme rainfall events.

The above issues should be fully considered in the EIA.

I am mindful of the urgent need to move away from the combustion of fossil fuels and towards energy generation from renewable sources, factors which are material to the consideration of this scheme, but it is important that renewable energy projects do not cause unnecessary release of carbon dioxide emissions.

Impact on Birds

The Local Wildlife Sites which will be directly affected by the scheme have been designated in part because they support notable local bird communities.

The citation for Knowl Moor Site of Biological Importance states that –

“The SBI includes the breeding territories of specialist moorland birds, which require extensive tracts of suitable habitat. Characteristic moorland breeding birds include red grouse and waders such as curlew*, golden plover and lapwing*. Other breeding birds include kestrel, wheatear, skylark* and a number of birds of prey. Redshank, dunlin, ring ouzel* and twite* have previously been recorded as breeding in the area. Other species recorded include fieldfare, bullfinch*, snipe, grey partridge*, meadow pipit, dipper, stonechat, sedge warbler, willow warbler, linnet*, reed bunting* and house sparrow*. Dotterel has been recorded on spring passage and snow bunting has been recorded in winter.*

*All species marked * in text above are UK Biodiversity Priority Species of bird”.*

It is not clear in the Scoping Report provided by the applicant that bird surveys undertaken to inform the proposals have necessarily included or properly assessed the impacts on *all* of the locally notable bird species which could be affected by the scheme. I would advise that the EIA includes bird surveys, assessments of impacts and proposals for mitigating and compensating for impacts on all notable bird species.

The Scoping Report prepared by the applicant does not seem to have properly considered the potential increases in disturbance which could be caused to birds during the operational lifetime of the development. Scout Moor 1 demonstrated that large wind turbine arrays can be a draw for increased numbers of people using the Moors, and the access tracks necessary to allow for construction and maintenance of the turbines will facilitate increased access. This will likely result in a consequent increase in the use of off-road vehicles, people walking dogs off leads and general visual and noise disturbance. This potential impact must be assessed in the EIA, and mitigation offered where necessary.

Cumulative Effects

Section 16 of the Scoping Report rightly considers cumulative effects but fails to make specific reference to the existing Scout Moor Wind Farm or the nearby Crook Hill Wind Farm. While I understand that these schemes were approved some time ago, and could therefore be said to have been assessed as part of the baseline conditions, it would in my view be very useful to assess

the impacts of these similar schemes, set within the same South Pennines context, in order to take fully into account and to address any environmental issues which arose during the construction and operation of these schemes.

I hope that these comments are useful.

Yours

Derek Richardson

Principal Ecologist