

Rachel Carney
Rochdale Metropolitan Borough Council
Development Control
Number One Riverside Smith Street
ROCHDALE
Lancashire
OL16 1XU

Our ref: SO/2025/125215/01-L01
Your ref: 25/00680/FUL
Date: 22 September 2025

Dear Rachel

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.

SCOUT MOOR WIND FARM, ROCHDALE

Thank you for consulting us on the above application, which we received on 26 August 2025.

We have reviewed the submitted information that is relevant to our remit and set out our position and comments below.

Environment Agency position

We have no objection in principle to the proposal, subject to condition in relation to land contamination. Our detailed comments are as follows:-

Land Contamination

The current or previous use(s) of the development site suggest that the land may be affected by contamination. Land contamination can harm human health, soils,

Environment Agency
Lutra House Walton Summit, Bamber Bridge, Preston, PR5 8BX.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
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ecosystems, property, drinking waters supplies, groundwater and surface water.

Land contamination is a material planning consideration. The planning decision should ensure that the site is suitable for its proposed use, considering any risks from contamination and any proposed land remediation. The planning application should therefore be supported by adequate site investigation information, prepared by a competent person. After remediation is carried out, as a minimum, the land should not be capable of being determined as contaminated land under [Part IIA of the Environmental Protection Act 1990](#). This approach is supported by paragraph 196 of the National Planning Policy Framework.

The current or previous use(s) of the site may present an unacceptable risk of contamination that could be mobilised during site works and construction, potentially leading to pollution of controlled waters. Controlled waters are particularly sensitive in this location because the proposed development site is located upon a secondary aquifer A.

The proposed development will be acceptable, if a planning condition is included requiring the submission and validation of a detailed land contamination management strategy for unsuspected contamination during the enabling, construction and/or development works. By cleaning up land contamination, it will be helping to protect and improve the groundwater quality that supports existing drinking water supply, future supply of drinking water and other environmental uses.

Without this condition we would object to the proposal in line with paragraph 187 of the National Planning Policy Framework because it cannot be guaranteed that the development will contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate or will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Condition

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until further investigation and a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

Reason

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraphs 187 and 196 of the National Planning Policy Framework.

Informative

Where a site is affected by contamination responsibility for securing a safe development rests with the developer and/or landowner. Developers should:

- Follow the risk management framework provided in [Land contamination: Risk management](#), when dealing with land affected by contamination
- Consider using the [National Quality Mark Scheme for Land Contamination Management](#) which involves the use of competent persons to ensure that land

- contamination risks are appropriately managed
- Refer to the [contaminated land](#) pages on gov.uk for more information

Biodiversity

We have no objection in principle to the construction of a new 17 turbine wind farm on Scout Moor, based on infrastructure layout SK02/P1 and a proposed design that is based around large scale habitat restoration and enhancement, water quality improvement, carbon sequestration and green energy generation (Planning, Design & Access Statement prepared by Turley and dated 15 July 2025).

The applicant has stated a commitment to deliver net environmental enhancement to large areas of ecologically important upland moorland habitat, which are also the source of many tributaries of the River Irwell and Roch waterbodies. This will be achieved through the implementation of detailed Moorland Restoration and Management (MRMP), Peatland Management Plan (PMP) and Habitat Management and Monitoring Plan (HMMP) across the Scout Moor site.

The large scale scheme will adopt environmental best practice measures, including actively avoiding important deep peat areas (see Figure 14.9 - Estimated Peat Depth), where there will predominantly be 50m development standoffs between new construction areas and upland watercourses. The scheme will also adopt hydrologically and ecologically sensitive construction techniques, such as floating road solutions (see Drawing No. SK14, Rev.2). Where depths of peat are greater than 0.5m, these areas will be protected to maintain natural hydrological and geomorphological characteristics of this upland moorland location.

The applicant has outlined a commitment to fully resource the MRMP (Atmos Consulting, June 2025, Rev.05) and PMP (Fluid Environmental Consulting, June 2025) over the 40-year lifespan of the project. This includes restoring identified degraded upland peatlands on 10 to 1 ratio for the approximate 20 plus hectares of peatland impacted by construction. The scheme will restore 346 hectares of blanket bog (118Ha in controlled restoration areas and 228Ha in community/common land restoration areas) to no less than moderate condition. All restoration works in these ecologically sensitive habitats will be undertaken by a specialist peatland restoration contractor.

The applicant has stated that the outline PMP and the proposed peatland restoration areas (see Figure 9.8 Peatland Restoration Proposals; referenced: TL02e/8706/HY/055a) will be further developed and informed by further detailed survey and specialist peat restoration contractor. There will be full reuse and retention of disturbed peat on site. The PMP will be a live document that will be informed, updated and amended where deemed necessary, by routine monitoring highlighted in the MRMP (see Table 14) & HMMP (see Section 4.8).

The HMMP (Atmos Consulting, May 2025, Ver.03) commits to delivering:

- A minimum 10.18% enhancement of habitats,
- Improvement of 2.84km of upland watercourses,
- A total site-wide enhancement of at least 10.62%.

Regarding riparian planting, the Environment Agency recommends that, in addition to native tree and shrub planting (HMMP, 4.5.3), enhancements should aim to create a more mixed mosaic of heathland, which is currently relatively rare habitat at the Scout

Moor site, in conjunction with species rich acid grassland. This will provide a more diverse and varied vegetation structure, provide better opportunity to stabilise any exposed or bare peat areas and reduce siltation risk/peat runoff to adjoining watercourses and should be monitored using quantitative measures outlined in Section 4.8.3 to ensure woodland species do not dominate or outcompete ericaceous species.

The Environment Agency would welcome further detail on the restoration techniques outlined in the MRMP, PMP and HMMP, particularly:

- Measures to maintain natural hydrological processes during construction and operation
- Identification and removal of any existing artificial drainage exacerbating peat loss and sedimentation issues in connecting waterbodies,
- Detailed solutions and locations of any erosional gully blocking with the aim to rewet the blanket bog,
- Appropriate revegetation and stabilisation of bare peat areas

We also support the applicant's approach outlined in the Environmental Management Plan (Cubico, June 2025) for the adoption of Construction Environmental Management Plan (CEMP) that ensures sensitive construction techniques will be adopted to protect and, where feasible, improve the natural hydrological and hydro geological features of moorland (see Environmental Statement, Chapter 14.88). This will be fully adhered to during construction phase and overseen by an Ecological Clerk of Works (ECOW) and include:

- Micro-siting of new turbines, trackways, substation and temporary construction compound
- Adopting environmentally sensitive design solutions that retain natural hydrological and geomorphological processes, and ecological connectivity for the four identified track crossing locations (see Drawing No: SK15; Rev. 2)
- Adoption of new multifunctional SUDs solution as part of scheme surface water drainage for all new wind farm hard infrastructure i.e., turbine hard standings and new trackways
- Optimal track and drainage design (see Drawing No: SK14; Rev 2)

Environmental permit – Flood risk activities - advice to applicant

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river
- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert

- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- any activity within 16 metres of a sea defence structure
- activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission (you do not need permission to build agricultural hay stacks, straw stacks or manure clamps in these places)

For further guidance please visit [Flood risk activities: environmental permits - GOV.UK](#) or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Yours sincerely

Mrs Dana Binns
Sustainable Places Planning Advisor

E-mail clplanning@environment-agency.gov.uk