

Date: 23 January 2026
Our ref: 25/00680/FUL Scout Moor Wind Farm_Rossendale BC (NE response)
Your ref: 25/00680/FUL



BY EMAIL ONLY

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Dear Rachel Carney

Planning consultation: 25/00680/FUL

Location: Scout Moor Wind Farm, Rochdale

Thank you for your consultation on the above dated 7th August 2025, which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. The following advice is provided under the Wildlife and Countryside Act 1981 and the Natural Environment and Rural Communities (NERC) Act 2006.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON THE WIDER SCOUT MOOR AREA, INCLUDING SECTIONS OF DEEP PEAT.

As submitted, the application could have potential significant effects on deep peat in the surrounding areas of Scout Moor and a longer lasting impact on the moorland itself. Natural England requires further information to determine the significance of these impacts and the scope for mitigation.

The following information is required:

1. Avoidance and Design Refinement

In relation to avoidance, we request further professional opinion on the siting of Turbines T13, T14, and T15, as well as any proposed track realignments, to ensure that impacts on the reactively intact peat mass and associated bog habitat are minimized or avoided wherever possible.

2. Peat Translocation Feasibility

The proposed peat translocation areas are critical to maintaining peat mass balance within the development and therefore require detailed assessment. It is essential to fully understand the feasibility of this component of the scheme. The identified translocation area is a former quarry site containing extensive areas of granular made ground. Additional information is required on how this area will be treated and whether it is suitable, in landform and substrate terms, to support appropriate peat hydrology.

3. Long-Term Hydrological Protection and Restoration

Given the potential long-term hydrological impacts of the project on the peat mass and bog, we recommend the incorporation of peat bunding techniques as part of the habitat restoration proposals.

Without this information, Natural England may need to object to the proposal.

Please re-consult Natural England once this information has been obtained.

Natural England's further advice is set out below.

Additional Information required

Landscape and Visual Impact, Public Access, and Peat / Moorland Restoration

Overview

Please see below Natural England's initial comments on the Landscape and Visual Impact Assessment (LVIA), Public Access, and Peat/Moorland Restoration elements of the project. These comments are preliminary and advisory in nature, reflecting the absence at this stage of a complete suite of assessment documents, including final site photography, figures, visualisations, and a full LVIA. As such, further comments may be provided as additional information becomes available. Much of the advice below is based on theoretical Zone of Theoretical Visibility (ZTV) analysis rather than verified field-based visual assessment.

Natural England's advice is guided by its statutory purpose to conserve and enhance:

- Natural beauty (including wildlife and cultural heritage);
- Landscape and scenic beauty, as set out in the National Planning Policy Framework (NPPF); and
- The special qualities of protected landscapes, as defined in their respective Management Plans.

Given the potential for significant impacts on nationally designated landscapes—specifically the Forest of Bowland National Landscape and the Peak District National Park—this advice focuses on:

- Potential impacts that could threaten special qualities or conflict with the purposes of designation or relevant policy objectives; and
- Significant effects on the statutory purposes of nationally designated landscapes.

Landscape and Setting Considerations

Relationship to Protected Landscapes

The proposed development lies outside the boundaries of the Peak District National Park (approximately 17 km to the southeast) and the Forest of Bowland National Landscape (approximately 16 km to the north). Consequently, the concept of *setting* is a critical consideration and should be fully addressed within the emerging LVIA.

In accordance with NPPF paragraph 189, it is not the setting itself that is protected, but the impact of development on the designated landscape. The LVIA should therefore consider how the proposal affects the setting of these protected landscapes.

Factors relevant to defining and assessing setting include:

- Landscape character within and beyond designated boundaries;
- Views to and from the designated landscapes;
- Associations between land inside and outside the designation;
- The experience of people travelling to and within the designated landscapes;

- How people experience and enjoy the designated landscapes;
- The extent to which the surrounding landscape complements or contrasts with special qualities;
- Contributions to scenic quality and special qualities;
- The understanding that setting is not fixed and must be defined in relation to the proposal;
- Landscape fabric (individual elements and features);
- Aesthetic aspects such as scale, enclosure, diversity, pattern, and colour;
- Perceptual and experiential qualities, including tranquillity, remoteness, and naturalness; and
- Overall landscape character, including modification of key characteristics or creation of new character.

Visual Assessment and Viewpoints

Visual effects are experienced by people, not viewpoints; viewpoints are representative samples selected to:

- Reflect the experience of different receptor groups;
- Illustrate key or classic views; and
- Demonstrate specific effects or issues.

The emerging LVIA should consider **sequential views**, particularly in relation to the Peak District National Park and linear routes such as the Pennine Way. Views of the turbines are likely to be experienced repeatedly over short time intervals, rather than occasionally.

At this stage, Natural England considers there is an opportunity to ensure adequate coverage and recommends that additional viewpoints be included from each Protected Landscape beyond those listed in Table 11.3. These viewpoints should address:

- Seasonal variation;
- Screening and filtering effects;
- Lighting, shadow flicker, and night-time effects.

The LVIA should also clearly assess whether landscape and visual effects are:

- Direct or indirect;
- Adverse or beneficial;
- Temporary or permanent;
- Short-, medium-, or long-term; and
- Reversible or irreversible.

Despite the distance between the development and the Protected Landscapes, there remains high susceptibility for:

- People engaged in outdoor recreation (including users of public rights of way and open access land);
- Visitors to heritage and public attractions where landscape setting is integral to experience; and

- Communities where views contribute to residential amenity.

The LVIA must provide transparent justification for professional judgements, including:

- How value and susceptibility inform receptor sensitivity;
- How scale, extent, and duration inform magnitude of change; and
- How sensitivity and magnitude combine to determine overall significance.

In the absence of current England-specific guidance for this type of development, Natural England supports the use of *NatureScot (2023) Visual Representation of Windfarms: Version 2.2*, as applied in this scoping exercise.

Natural England cannot reach firm conclusions on landscape impacts until the full LVIA is produced in line with *Guidelines for Landscape and Visual Impact Assessment (Third Edition)*.

While curvature of the earth and intervening features significantly reduce visual impacts beyond certain distances (e.g. effects on Nidderdale are unlikely), the Forest of Bowland National Landscape, the Peak District National Park, and Calderdale Special Landscape Area have been identified as sensitive receptors with potential for significant effects. Further assessment is therefore required, with early consideration of turbine siting within development zones as a key mitigation measure.

Public Access

- The common land has Section 15 access rights (not CROW), with horse riding permitted across the entire common.
- Access structures should therefore be gates suitable for horses; stiles are not appropriate.
- Replacement common land should retain horse riding rights in addition to pedestrian access.
- This should be secured through Section 16 CROW dedication, including removal of restrictions on horse riding.
- The path network mapping provided is insufficiently detailed; clearer mapping is required.
- It should be confirmed whether British Horse Society (BHS) guidance on wind turbines and horse riders has been consulted.
- Additional detail is required on measures to deter unauthorised motor vehicle access.
- Natural England recommends an active ranger service operating seven days per week, with increased presence during peak leisure periods (Easter–Autumn and Christmas/New Year), particularly to address trail bike use.

Peat and Moorland Restoration

Avoidance and Design

Peat probing and micro-siting have been undertaken; however, Natural England considers avoidance to be the primary principle, therefore we request further information on the methodology used to determine the siting of turbines. In the case of T13, T14, and T15, micro-siting alone is insufficient, and relocating turbines and tracks away from deep peat is a key requirement.

Natural England also requests sight of the outcomes of the proposed walkover hydrological survey to better understand baseline conditions and how these inform restoration and rewetting proposals.

Hydrological Impacts

Natural England considers that hydrological effects on peat are not adequately addressed in the Scoping Report. While peat management is recognised as important—through construction sequencing, peat translocation, and emerging management plans—excavation and movement of peat fundamentally alter its hydrological properties and can affect adjacent peat within the zone of hydrological influence.

Concerns include:

- The suitability of the former quarry (with granular made ground) to support peat hydrology and active bog following translocation;
- The need to consider peat condition (e.g. moisture content and humification) when assessing restoration potential;
- The importance of understanding drainage and hydrological modification in determining whether peat is better used for bunding and damming rather than translocation;
- The recommendation to consider peat bunding approaches, including methods developed in the West Pennine Moors SSSI.

Infrastructure and Peat Depth

Although the Scoping Report states that peat over 1 m deep will be avoided for turbine siting, other infrastructure may still be located on deep peat. Natural England considers peat deeper than 0.3 m to be “deep peat” and notes that infrastructure placed on peat—even below 1 m—can significantly affect hydrological integrity.

Infrastructure design must consider impacts beyond the immediate footprint and within the zone of hydrological influence, including:

- Route selection and design to avoid unintended drainage pathways;
- Interaction with existing and new artificial drainage; and
- Particular concern regarding T13, T14, T15 and associated track alignments within a large, relatively intact peat mass that should be prioritised for protection and restoration.

Restoration Commitments and Outstanding Queries

The Scoping Report commits to a Habitat Management and Monitoring Plan and Moorland Restoration and Management Plan, with restoration at a 1:10 ratio and no net loss of peat.

Outstanding questions include:

1. Whether this ratio applies only to the footprint of infrastructure that directly impacts the peat or if that includes the wider hydrologically affected area;
2. The extent of developer control over land management and grazing regimes;
3. Whether restoration includes only bare and eroding peat, or also grip blocking and wider hydrological rewetting.

Natural England supports wider rewetting approaches, including horseshoe bunding, to maximise restoration benefits and retain peat on site.

Assessment and Monitoring

The Scoping Report identifies significant effects on peatland habitats and hydrology during construction, operation, and decommissioning. These reinforce concerns about hydrological

modification and infrastructure impacts.

Further clarity is required on:

- Peatland hydrology, drainage features, and surface water flows;
- How peat probing and condition surveys (July 2024) and the emerging hydrological assessment have informed restoration proposals;
- The potential impacts of new drainage infrastructure during operation and decommissioning.

While peat disturbance is presented as primarily a construction issue, Natural England notes the absence of sufficient consideration of long-term hydrological modification associated with turbines and infrastructure.

If you have any queries relating to the advice in this letter please contact me on 07900608264.

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, this will fall under our [Discretionary Advice Service](#) (DAS).

Please consult us again once the information requested above, has been provided.

Yours sincerely

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Natural England