

Appendix 2.2 - Statutory Consultation Comments

The comments from statutory consultees in response to the consultation on the EIA Scoping Report by Rochdale Metropolitan Borough Council (RMBC) and Rossendale Borough Council (RBC) have been reviewed. These comments are summarised in the table below, alongside responses and where further information can be found within the Environmental Statement and other Application documents.

Consultee / summary of comments	Response
National Air Traffic Services	
An impact is anticipated that has been deemed to be unacceptable on Prestwick Centre ATC, Swanwick Centre ATC.	The impact of wind farms on ATC radars is well understood and different mitigation solutions exist (as laid out in the UK CAA CAP 764 Policy and Guidelines on Wind Turbines). Details of proposed mitigation is provided in the Aviation Impact Assessment that accompanies the Applications.
Ministry of Defence	
Request for information to complete a full assessment (e.g. grid references for individual turbines, hub height of the turbines, rotor diameter of the turbines, site layout plan and grid reference and height of met mast). Also noted concerns with this proposal due to the potential impact to the ATC radar at RAF Warton and low flying aircraft operating in the development area.	Further consultation with MOD has been undertaken to provide the necessary information. Details of proposed mitigation is provided in the Aviation Impact Assessment that accompanies the Applications.
MAG Aerodrome Safeguarding	
In view of the anticipated impact upon the Manchester RADAR they advise that the current development proposal is unacceptable and support NATS objection to this development.	Details of proposed mitigation is provided in the Aviation Impact Assessment that accompanies the Applications.
Mining Remediation Authority (previously the Coal Authority)	
Note that records indicate that within the area identified there are recorded coal mining features present at surface and shallow depth including; in excess of 130 mine entries, coal workings and reported surface hazards. These features pose a potential risk to surface stability and public safety. Building over the top of, or in close proximity to,	As part of the design evolution repositioning has been carried out to move turbines out of influencing distance of known mine entries. A micro-siting allowance of 50m has been incorporated to enable constraints such as unrecorded coal mines to be taken into consideration following further ground investigation works. A Coal Mining Risk Assessment accompanies the Applications.

Consultee / summary of comments	Response
mine entries should be avoided wherever possible. No requirement for land instability to be included within the ES, though request for the application to be supported by a Coal Mining Risk Assessment (CMRA).	
Lead Local Flood Authority (Lancashire County Council)	
Agreement with scope of the EIA Scoping Report. A site-specific flood risk assessment and surface water sustainable drainage strategy should be completed. Consideration of surface water flood risk during the construction and operational stages. Compilation of a site-specific 'Operation and Maintenance Manual' for the lifetime of the development for each sustainable drainage component. Avoidance of crossing, diverting, and / or culverting ordinary watercourses unless necessary, with appropriate mitigation measures if unavoidable. Obtaining Ordinary Watercourse Consent from LCC before undertaking certain works on ordinary watercourses.	A Flood Risk Assessment and Drainage Strategy have been submitted as part of the Applications. Details on the maintenance and adoption of SuDS features is contained in the Drainage Strategy. The Project for Assessment has been designed to reduce the number of watercourse crossings where possible. A total of 4 watercourse crossings will be constructed near to Turbines 10, 14 (x2) and 16. Further details are provided in Appendix 14.5 and typical details of watercourse crossings are provided in Figure 4.22. Appropriate consents will be sought prior to construction of the Project for Assessment.
Natural England	
The ES should meet the legislative requirements set out in the relevant regulations. Ecia should be completed in line with CIEEM guidelines. The ES Should assess the effects on the South Pennine Moors SPA / SAC; Lee Quarry SSSI, West Pennine Moors SSSI and South Pennine Moors SSSI. The ES should consider impacts on LWS and geological sites. The ES should assess the impacts of all phases on protected species and supporting surveys should be optimal times of the year.	See Chapter 1: Introduction and Appendix 1.1 which outlines the required information and where this is located within this ES. Assessment presented within Chapter 9: Ecology and Chapter 10: Ornithology have been completed in line with the current Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines. The designations in proximity to the Assessment Boundary have been considered and effects on the majority have been determined to be unlikely to be significant due to distance, absence of an impact pathway, etc. Details are provided within Chapter 9: Ecology and Chapter 10: Ornithology. However, effects on the West Pennine Moors SSSI have been considered and are reported in Chapter 10: Ornithology.

Consultee / summary of comments	Response
The ES should include a full assessment of the impacts of development on local landscape character as well as the visual impacts. The ES should consider the potential impacts on access land, common land, PRow and where appropriate English Coastal Paths. ES should consider the effects on soils and the agricultural land that would be lost / disturbed as part of the development (including BMV land). Natural England do not support the principle of developing on restorable peat. Sufficient detail should be provided within the ES to determine if restorable peat is present. Peat survey should be undertaken to determine the presence of peat, its depth and the presence of any spoil / waste materials that would impact restoration ability. Natural England advise that peat surveys should be carried out in line with the IUCN peatland programme field protocol. The ES should take account the risk of air pollution and how this should be managed and reduced. The ES should identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050.	Impacts on Knowl Moor SBI and Scout Moor BHS have been considered and are reported in Chapter 9: Ecology. All other locally designated ecological sites have been 'scoped out' and further details are provided in Chapter 9: Ecology. Impacts on geological sites have been 'scoped out' (see the EIA Scoping Report in Appendix 2.1). Effects on foraging and commuting bats, badgers, water voles, otters, reptiles and amphibians are reported in Chapter 9: Ecology. Effects on Lapwing, Dunlin and Curlew, Merlin and Kestrel are presented in Chapter 10: Ornithology. Details of the relevant surveys completed are fully detailed as part of Chapter 9: Ecology and Chapter: 10 Ornithology. Effects on landscape character and visual amenity have been assessed and are reported in Chapter 11: Landscape and Visual, supported by associated figures and appendices. Effects on recreational access have been considered and are reported in Chapter 6: Transport and Access. Agricultural land is scoped out of the EIA (refer to the EIA Scoping Report in Appendix 2.1). Effects on peat are presented in Chapter 14: Hydrology, Hydrogeology and Peat, with supporting figures and appendices. Details of how peat will be restored and managed are contained within Moorland Restoration and Management Plan and Appendix 14.3. Details of the peat surveys undertaken is contained within Appendix 14.2. An Air Quality Assessment has been submitted as part of the Applications. A detailed assessment of the greenhouse gas emissions, savings and net GHG effect is provided in Chapter 15: Climate Change.
Lancashire County Council – Highways	
The ES should consider highways and access impacts and a Transport Assessment should be prepared. Traffic management will be required for the Electrical Grid Connection works. An assessment of public rights of way is required.	An assessment of transport-related effects is provided in Chapter 6: Transport and Access. A Transport Assessment has been prepared and is included as Appendix 6.1 and this includes an Abnormal Indivisible Load (AIL) route survey. A swept path analysis of the access route from Scout Road has also been completed. It is recognised that traffic management works will be required and a suite of measures are set out in Chapter 6: Transport and Access and Appendix 6.1. Licenses /

Consultee / summary of comments	Response
	permissions will be sought in advance of commencing the cable installation works, as required. An assessment of effects on Public Rights of Way is provided in Chapter 6: Transport and Access and a suite of mitigation measures have been identified. Further details of works and enhancements proposed as part of the Project for Assessment are also provided in the Outdoor Access Management and Enhancement Plan.
Lancashire County Council – Archaeology	
Agreement with the Preliminary Archaeological Desk-Based Assessment.	Noted. The assessment of effects on archaeological remains is provided in Chapter 13: Archaeology .
United Utilities	
Layout and design to take account of United Utilities assets and their easements and avoid areas of deeper peat. Mitigation should address a range of issues including the protection of our assets as well as any wider impact on our operations including peat excavation methods and mitigation. Residual risk of flooding should be considered in the ES. Details of drainage during construction and operation should be provided. The ES should provide an assessment of potential environmental impacts from ground conditions including any contamination, hazardous materials or dewatering fully and the impacts on United Utilities assets, water resources, water catchment land and water quality.	The development of the layout has taken account of United Utilities assets and has sought to avoid areas of deeper peat (i.e. >1m), where possible. Mitigation measures related to the protection of utilities and peat resource are outlined in Chapter 4: Development Specification, Chapter 14: Hydrology, Hydrogeology and Peat and Volume 3: Environmental Management Plan. Effects related to flood risk are considered unlikely to be significant and therefore have been ‘scoped out’ (see the EIA Scoping Report in Appendix 2.1). A Flood Risk Assessment has been prepared which accompanies the Applications. Drainage details are set out in the Drainage Strategy that accompanies the Applications. Effects relevant to hydrology, hydrogeology and peat have been assessed within Chapter 14: Hydrology, Hydrogeology and Peat, including those on public water supplies.
Health and Safety Executive	
No comments.	Noted.
National Highways	
Provision of a Transport Assessment. Clarification on the abnormal load movements that might need to use the strategic road network for delivery of turbines and structural components.	A Transport Assessment has been prepared and is provided in Appendix 6.1. This contains details of the estimated movements, including by AIL, to / from site and the anticipated routing. Mitigation measures to reduce impacts on the local and strategic road network are set out within Chapter 6: Transport and Access and the Transport Assessment in Appendix 6.1.

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Consideration of mitigation within a CEMP.	These are also summarised in Volume 3: Environmental Management Plan .
Historic England	
An appropriate study area should be used.	The study area extends 15km from site. The heritage assets identified have then been filtered to ensure that only those potentially subject to likely significant effects have been considered. Further details are provided in Chapter 12: Built Heritage and the supporting Heritage Assessment in Appendix 12.1 .
Impacts on the underlying peat resource (including via dewatering) and archaeological remains should be assessed and mitigation set out.	Impacts on the archaeological resource – including palaeoenvironmental remains within peat deposits – have been considered within Chapter 13: Archaeology . Information from the peat surveys on-site has been used to inform the assessment of geoarchaeological potential. Mitigation measures are outlined in Chapter 13: Archaeology and Volume 3: Environmental Management Plan .
Environment Agency	
Implementation of good practice measures and ongoing monitoring of moorland restoration proposals.	Good practice construction management measures will be implemented, as set out in Chapter 14: Hydrology, Hydrogeology and Peat , supporting appendices and Volume 3: Environmental Management Plan . Ongoing monitoring arrangements are outlined in the Moorland Restoration and Management Plan and Habitat Management and Monitoring Plan submitted alongside the Applications.
Risk of pollution associated with sedimentation / silt mobilisation and historic land uses to be considered.	Effects related to erosion and sedimentation and pollution risks are considered in Chapter 14: Hydrology, Hydrogeology and Peat . Ground conditions and contamination is scoped out of the EIA on the basis of the implementation of management and mitigation measures (see further details in the EIA Scoping Report in Appendix 2.1).
Request details of construction and operational drainage and requirement for a site-specific Flood Risk Assessment.	Details of construction and operational drainage are provided in the Drainage Strategy that accompanies the Applications. A detailed Flood Risk Assessment has also been prepared that has been submitted as part of the Applications.
Watercourse crossings should be minimised and drainage layout should maintain overland flow routes and channels.	Watercourse crossings have been minimised, with details provided in Chapter 14: Hydrology, Hydrogeology and Peat and Appendix 14.5 .
Environmental Protection (provided by Salford City Council officers)	
Expectation to submit a suitable contaminated land risk assessment. This will include a Phase 1 as a minimum. Phase 2 Site Investigations and Remediation Strategies and	A Phase 1 Risk Assessment has been prepared and is submitted with the Applications, which considers all sources of contamination. Further intrusive investigations will be undertaken and any remedial mitigation strategies will be prepared as set out in Volume 3: Environmental Management Plan .

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Verification will need to be agreed with RBC. Coal Mining Risk Assessment and mine gas risk assessment should be considered concurrently. Peat and alluvium, are also low-level sources of ground gas and covered in future assessments.	A separate Coal Mining Risk Assessment has been prepared and submitted as part of the Applications.
Hyndburn Borough Council	
Supports Natural England's comments.	See responses to Natural England's comments above.
Met Office	
Notes the potential for degradation of the data and services and requests further information to ensure the impacts are understood.	An assessment of the potential impacts on the Hameldon Hill meteorological radar is provided in the Aviation Impact Assessment submitted alongside the Applications.
Greater Manchester Archaeological Advisory Service	
Content with the scope of the proposed archaeology chapter.	Noted.
Sports England	
No comments.	Noted.
Greater Manchester Ecology Unit	
West Pennine Moors SSSI should be considered. Local ecological designations should be fully considered within the ES. Impacts on peat should be considered within the ES. Bird surveys, assessments of impacts and proposals for mitigating and compensating for impacts on all notable bird species should be included within the ES. Impacts from recreational usage of the moorland should be considered within the ES.	Effects on the West Pennine Moors SSSI have been considered as part of the assessment presented in Chapter 10: Ornithology. Effects on locally designated ecological sites – in particular Knowl Hill SBI and Scout Moor BHS – have been assessed and are reported in Chapter 9: Ecology. The rationale for 'scoping out' effects on other designations is also provided in this Chapter. Impacts on peat in terms of habitats have been assessed and are presented in Chapter 9: Ecology. Impacts on peat as a resource are reported in Chapter 14: Hydrology, Hydrogeology and Peat. Mitigation measures, including the delivery of the moorland restoration proposals, are set out in these Chapters as well as Volume 3: Environmental Management Plan. Bird surveys have been undertaken to inform the assessment of impacts that is presented in Chapter 10: Ornithology. Relevant mitigation measures are also outlined in this Chapter as well as in Volume 3: Environmental Management Plan. The management of recreational access is considered within the ES, including within Chapter 6: Transport and Access, and

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	in the Outdoor Recreational Management and Enhancement Strategy . Operational effects on ecological receptors are presented in Chapter 9: Ecology and Chapter 10: Ornithology .
Lancashire County Council – Public Rights of Way	
An assessment of impacts on Public Rights of Way should be provided, including management of health and safety issues during construction.	An assessment of impacts during construction is provided in Chapter 6: Transport and Access . In addition, the enhancement strategy for rights of way is provided in the Outdoor Access Management and Enhancement Strategy .
Details of any diversions will need to be provided.	Where diversions are proposed, appropriate notifications and permissions will be obtained.
Bury Metropolitan Borough Council	
In the event highways within Bury are to be used then traffic management arrangements should be implemented.	Details of the route AILs will take and the associated details are contained within Annex A Route Survey Report of the Transport Assessment provided in Appendix 6.1 .
Additional viewpoints are to be included.	The additional viewpoints outlined have been considered and where the visual receptor group is similar, one location has been chosen such as at Greenmount and Longsight Road. Locations have been selected where views of the proposed turbines are not obstructed by localised vegetation and buildings. Further details are provided in Chapter 11: Landscape and Visual and supporting appendices.
Rossendale Borough Council – Urban Design	
A detailed heritage assessment is required.	See Chapter 12: Built Heritage and supporting Heritage Assessment in Appendix 12.1 .
Rossendale Borough Council – Contaminated Land	
Low potential for contamination noted.	Ground conditions and contamination is scoped out of the EIA (see the EIA Scoping Report in Appendix 2.1). However, where relevant, effects from pollution are considered in the context of the hydrological, hydrogeological and peatland environment in Chapter 14: Hydrology, Hydrogeology and Peat . Further details on contamination are provided in the Phase 1 Risk Assessment .