

Appendix 2.3 - Non-Statutory Consultation Comments

The comments from non-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 and key themes identified. These key themes are outlined in the table below, alongside responses and where further information can be found within the Environmental Statement and other Application documents.

Key theme	Response
Impacts on recreational access and safety	There are a number of public rights of way (PRoWs) and permissive / informal paths that cross the Assessment Boundary. There are also areas of the Assessment Boundary classified as Open Access Land and Common Land. It is known that areas within the Assessment Boundary are used by a number of individuals / groups and organisations, such as local walkers and ramblers, cyclists and mountain bikers, equestrians, dog walkers, long-distance walkers, community groups, sports and running clubs and nature conservation groups. Proposed access will be from the existing Scout Moor Quarry access as that will connect to a series of existing / new internal access tracks that will serve the wind turbines and other proposed infrastructure. Given this, there will be points where the site access track crossing with public routes that traverse the moorland. In addition, health, safety and security requirements will make it necessary to manage the use of routes where they traverse / come in proximity to the construction working areas and intersect with the site access tracks. As part of a Path Management Plan, a suite of measures are proposed, such as giving path users priority at designated crossings, the erection of barriers (e.g. Heras fencing) to separate public routes from construction areas, implementation of temporary vehicle restraint systems in higher-risk locations and horse rider awareness training for heavy good vehicle (HGV) drivers and other relevant site staff. In addition, construction vehicles will not be permitted to use Rooley Moor Road. The access gates at either end of Rooley Moor Road will be retained / maintained to manage movement and discourage misuse. The assessment of impacts on recreational access is reported in Chapter 6: Transport and Access and changes in views / visual amenity are presented in Chapter 11: Landscape and Visual. Mitigation measures are outlined within Volume 3: Environmental Management Plan as well as Appendix 6.1: Transport Assessment.
Enhancements to recreational access as part of the Project for Assessment	As part of the Project for Assessment works will be undertaken to enhance public access, including: Opening 10.3km of site tracks to walkers, cyclists and horse riders (following completion of works), creating opportunities for new circular recreational routes to provide more opportunities for outdoor exploration;

Key theme	Response
	- Establishment of a new link from Rooley Moor Road to avoid a section with a steep incline, in part utilising the site access tracks in the northern part of the Assessment Boundary, near the substation; - Strengthening the connection between Lee Quarry and Cragg Quarry mountain bike facilities via access tracks, improving mountain biking and multi-use access across the area; - Upgrading infrastructure, such as car parks and amenity areas, enhancing waymarking and potential introduction of inclusive design measures (e.g. installing self-closing gates); and - Provision of information panels / boards at key locations to highlight historic features, water supply infrastructure and renewable energy. Further details are provided in the Outdoor Access Management and Enhancement Plan submitted alongside the Applications.
Control of illegal activity on the moorland	It is recognised that illegal activity currently occurs on the moorland. As part of the coordinated package of measures to reduce illegal off-road vehicle use, barriers will be installed to prevent access, including fencing, bunds, strategic planting and controlled access points to deter illegal vehicles while maintaining access for walkers, cyclists and horse riders. Operational site management will also be undertaken, including: - The potential for a Ranger to ensure ongoing maintenance and community engagement; - Deployment of CCTV, motion-activated cameras and drones to track illegal activity and support enforcement efforts; - Use of signposting to encourage responsible off-roading at dedicated facilities; and - Enforcement collaboration alongside education (e.g. awareness campaigns) and wider partnership support and coordination. Further details are provided in the Outdoor Access Management and Enhancement Plan submitted alongside the Applications.
Impacts on amenity	As part of the EIA, a thorough assessment of amenity-related impacts has been undertaken, in particular considering noise, shadow flicker and changes in views / character (including during the night-time) given the potential for likely significant environmental effects. Other topics-related to amenity (e.g. air quality, lighting) have been ‘scoped out’ as no significant effects were anticipated. Where relevant, mitigation has been identified to the identified impacts in line with relevant standards and guidance documents. Further details are provided in Chapter 7: Noise and Vibration, Chapter 8: Shadow Flicker and Chapter 11: Landscape and Visual. Relevant mitigation is outlined in these Chapters and in Volume 3: Environmental Management Plan.
Impacts on moorland hydrology	Following a review of the Project for Assessment and baseline data collection, the following impacts were identified to potentially occur on hydrology:

Key theme	Response
	• Erosion and sedimentation effects; • Alteration of flow, natural drainage patterns / runoff volumes and rates; • Potential pollution events affecting groundwater and surface water quality; • Peat landslide hazard risk; and • Loss, degradation and disturbance of peat resource. The interactions / combination of these effects was considered and where relevant, mitigation has been identified to reduce / minimise impacts in line with relevant standards and guidance documents. The assessment of impacts on moorland hydrology and hydrogeology is reported in Chapter 14: Hydrology, Hydrogeology and Peat. Mitigation measures are outlined within Volume 3: Environmental Management Plan as well as Appendix 14.1: Good Practice Methods.
Impacts on the peat resource	Peat was identified on-site from the outset. A series of investigations have been undertaken to identify the depth of peat in the locations proposed for the wind turbines and associated infrastructure. The results of these investigations were used to refine the layout, avoiding areas with peat of greater than 1m in depth where possible. Impacts on the peat resource have been considered both as a resource in its own right (looking at similar effects to that on moorland hydrology listed above) and in the context of greenhouse gas emissions within the EIA. The assessment of impacts on peat resource on-site is reported in Chapter 14: Hydrology, Hydrogeology and Peat and greenhouse gas emission assessment is presented in Chapter 15: Climate Change. Mitigation measures are outlined within Volume 3: Environmental Management Plan as well as Appendix 14.1: Good Practice Methods and Appendix 14.3: Outline Peat Management Plan.