

Appendix 2.4: Post Submission Statutory Consultation Comments

The comments from statutory consultees in response to the submission of the Application and associated 2025 Environmental Statement (ES) by Rochdale Metropolitan Borough Council (RMBC) and Rossendale Borough Council (RBC) have been reviewed. Where relevant to the ES, these comments are summarised in the table below, alongside responses and where further information can be found within the ES and other Application documents. It should be noted, more detailed responses are documented within the '**Applicant to Statutory & Non-Statutory Consultee Comments**', covering points beyond the ES submitted as part of the wider Further Environmental Information (FEI) Submission. There is also a '**You Said, We Heard, We Acted**' document that sets out the Applicant response to public comments.

Consultee Name	Date of Response(s) to each LPA	Summary of Response(s) relating to the ES	Response
Chapter 6 Transport & Access			
Lancashire County Council Highways (as Local Highway Authority for Rossendale)	RBC: 7 th November 2025 RMBC: N/A	The following information was requested prior to the determination of the application to allow a full assessment of the impact on the Local Highway Network to be undertaken: - A detailed Construction Traffic Management Plan (CTMP) covering all vehicle movements to and from the construction site of the wind turbines. - A detailed Construction and Traffic Management Plan for the works regarding the cable installation and related works, this needs to detail all the proposed works to be undertaken and demonstrate how the existing highway users would be accommodated. It was agreed that a Staff Travel Plan could be secured via planning condition.	The Applicant and Pell Frischmann (as the appointed Transport Consultant) met with LCC Highways on 02 December 2025 to discuss their consultation response. It was agreed that as the detailed CTMP, including Abnormal Indivisible Load (AIL) routing, management and escort strategy, would be subject to the completion of procurement and final turbine selection, alongside input from the relevant Police Force, an 'outline' CTMP could be provided at this stage – this is presented in Section 8 of the Transport Assessment . Similarly, the installation of the electricity grid connection will be subject to further detailed design once the preferred route is formally selected, however, an 'outline' CTMP is presented in Section 9 of the Transport Assessment .
National Highways	RBC & RMBC: 16 th September 2025, 8 th January 2026, 11 th March 2026 and 12 th June 2026	ES and TA must present a robust SRN safety baseline and assess whether construction traffic could exacerbate existing safety issues. Include SRN links and junctions (e.g. M65, M66, A56).	The Applicant and Pell Frischmann (as the appointed Transport Consultant) met with National Highways on 25 November 2025 to discuss their consultation response.

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		• Provide minimum 5-year collision dataset. • Incorporate STATS19 causation factors where available.	It was agreed that SRN accident data for the last 5 years (presented annually) would be provided – this is set out in Section 5.6 of the Transport Assessment .
		Revised cumulative development approach and ensure key schemes are not omitted. • Include Local Plan / emerging allocations - Specifically include Huncoat Garden Village - Include M65 Junction 8 upgrade and associated works. • Provide clear methodology for inclusion/exclusion	The Applicant and Pell Frischmann (as the appointed Transport Consultant) met with National Highways on 25 November 2025 to discuss their consultation response. Pell Frischmann proposed that it would be more appropriate to undertake an updated review of cumulative developments as part of the preparation of the CTMP at time of construction as this would mean traffic management measures are more accurate on the basis of up-to-date programming for cumulative developments, including Huncoat Garden Village and the upgrade works at J8 M65. This is explained further in Section 8.6 of the Transport Assessment. National Highways confirmed agreement in-principle to this approach and that no further information would be required prior to determination of the planning application.
		Provide further detail on abnormal load routing. • Assess three SRN junctions • Assess Historic Railway Estate crossing (A59) • Confirm SRN suitability for AIL movements (subject to mitigation)	The Applicant and Pell Frischmann (as the appointed Transport Consultant) met with National Highways on 25 November 2025 to discuss their consultation response. Pell Frischmann confirmed that the Transport Assessment (and its associated AIL Route Survey) sets out an indicative port of entry (POE) and route to the Site, however, this remains in flux until the final turbines have been formally selected and the suitably qualified hauliers appointed – on this basis there remains potential for an alternative POE and route to Site to be selected. However, the approval of this sits outside of the planning process for the Proposed Development and will be addressed through the statutory AIL Permitting process under <i>'The Road Vehicles (Authorisation of Special Types) (General)</i>

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			<i>Order 2003'</i>. Pell Frischmann confirmed that all information relating to weight impact and bridge/structure condition surveys would be addressed through the AIL Permitting application once the final details of the Proposed Development are known post planning – this is explained further in Section 8.1 of the Transport Assessment. National Highways confirmed that liaison through the AIL Permitting process is acceptable as the standard approach and on this basis no further information would be required prior to determination of the planning application.
		Provide more detailed traffic flow data • Provide hourly construction traffic flows • Assess interaction with AM/PM peak periods	Vehicle movements are detailed in in Table 13 of the Transport Assessment. Staff movements will occur outwith the network peak periods as works will commence onsite at 7am and conclude at 7pm on weekdays. HGV deliveries will occur throughout the day. On average, this would result in 9 HGV movements (5 inbound and 4 outbound) per hour. This level of traffic is below National Highways threshold of 30 movements per hour requiring junction assessments. The level of construction traffic that results from the Proposed Development would not have a significant impact on the peak hour operation of the strategic road network junctions. If required, the finalised CTMP can include a requirement preventing the low levels of HGV traffic of operating in the network peak hours.
		Provide detailed baseline conditions and assessment at M65 J8: • Explain role in construction and AIL routing	The Applicant and Pell Frischmann (as the appointed Transport Consultant) met with National Highways on 25 November 2025 to discuss their consultation response.

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		Confirm measures to avoid/manage peak-hour traffic	National Highways confirmed that J8 M65 has existing issues with congestion and significant safety issues. The emerging Hyndburn Local Plan identifies the c.1,800 dwelling Huncoat Garden Village proposal which will have direct impacts on J8. National Highways have identified potential upgrade works to J8 M65 and it is considered that the delivery of these works (2026-2028) may co-inside with construction of the Proposed Development. On this basis, National Highways would wish to control/limit movements through J8 M65, particularly at peak times, to avoid congestion issues. Pell Frischmann confirmed that it would be possible to impose controls/limits on construction traffic flows from the Proposed Development through J8 M65 by defining a moratorium period for defined hours – this can be secured via the Construction Traffic Management Plan (CTMP) imposed under planning condition. The CTMP could also include requirements for vehicle identification to assist with reporting of non-compliance. This is explained further in Section 8.1 of the Transport Assessment. National Highways noted that this would need to be agreed with the respective Local Highway Authorities and Local Planning Authority Enforcement Teams but was acceptable in-principle. On this basis, National Highways confirmed that no further information would be required prior to determination of the planning application.
		Strengthen transport assumption regarding minibus provision: - Provide routes and pick-up/drop-off locations. - Detail parking arrangements	The Applicant and Pell Frischmann (as the appointed Transport Consultant) met with National Highways on 25 November 2025 to discuss their consultation response. The Applicant set out its commitment to the provision of a Construction Staff Travel Plan (CSTP) to be secured via planning condition. This will include a commitment to provide a minibus

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			shuttle service to site for construction workers, with pick up points relating to public transport interchanges (bus/train/park-and-ride). The precise detail and routing of the minibus is subject to the appointment of a contractor (post planning) – this is explained further in Section 8.8 of the Transport Assessment. National Highways confirmed that in-principle securing a CSTP via condition would be acceptable, but this should be confirmed with the respective Local Highway Authorities (LHA). National Highways confirmed that no further information would be required prior to determination of the planning application.
		Demonstrate coordinated transport management so that cumulative construction impacts can be actively managed.	The Applicant and Pell Frischmann (as the appointed Transport Consultant) met with National Highways on 25 November 2025 to discuss their consultation response. Pell Frischmann confirmed that the Applicant is committed to collaborating with National Highways, the respective Local Highway Authorities and other interested parties on construction traffic management, to ensure a coordinated approach to mitigation and management, and that this can be incorporated into the CTMP to be secured via planning condition – this is explained further in Section 8.6 of the Transport Assessment. National Highways confirmed agreement in-principle to this approach and that no further information would be required prior to determination of the planning application.
United Utilities	RBC: 10 th October 2025 RMBC: 10 th October 2025	Raises an objection in light of the anticipated overlap of construction works between the Proposed Development and UU's Haweswater Aqueduct Resilience Programme (HARP), including	The Applicant and Pell Frischmann (as the appointed Transport Consultant) met with United Utilities on 01 December 2025 to discuss their consultation response.

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		potential to conflict with the HARP projects Haslingden Compound and off-site highway work designs required for AIL. UU requested that this is resolved prior to determination of the application.	It was agreed that the Applicant and United Utilities would need to collaborate on construction programming to manage traffic and transport impacts, and that this could be resolved through the preparation of the detailed CTMP for the Proposed Development. This is explained further in Section 8.6 of the Transport Assessment. United Utilities agreed to provide further detail on the level of commitment required to resolve this prior to determination of the Application and this is expected to be provided in their consultation response to the Further Environmental Information submission.
Bury Metropolitan Borough Council (BuMBC)	RBC: 23 rd January 2026 RMBC: 23 rd January 2026	Requests that Bury's Local Highway Authority is consulted on the subsequent condition discharge applications in relation to Construction Traffic Management Plans.	The Applicant agrees that Bury's Local Highway Authority, as well as all Local Highway Authorities covered by the AIL routing, should be consulted by the Local Planning Authorities (LPA's) on the future discharge of conditions application(s) relating to Construction Traffic Management Plans.
Chapter 7 Noise and Vibration			
Hayes McKenzie Partnership (HMP) (Consultant on behalf of the LPA's)	RBC: 19 th September 2025 RMBC: 19 th September 2025	Neutral: Requested further detail / justification / information in relation to windshields; noise contours; tonality; mitigation; lower limiting values; calibration certificates; background noise data exclusions and graphs/data presentation; alignment of noise data/limits; sound power level data; small turbine data; directivity; topography corrections; amplitude modulation; and cumulative conditions.	A detailed response to these comments is provided at Annex 10 of Appendix 7.2 (Operational Noise Report) of the FEI Environmental Statement, Volume 2.

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RBC Environmental Health	RBC 26 th September 2025 RMBC: N/A	No Objection: Confirms that there are no comments on noise and vibration.	The Applicant notes this response.
Norden, Bamford & Heywood Bridleways Association	RBC: 29 th September 2025 and 4 th October 2025 RMBC: 29 th September 2025	Objection: - Considers that noise generated from both the blades turning and the rotational equipment associated with the wind turbines which will have adverse effects on horses in the vicinity. - Questions the ETSU-97-R standard being dated and unsuitable for the assessment of the Proposed Development.	A detailed response to these comments is provided at Annex 11 of Appendix 7.2 (Operational Noise Report) of the FEI Environmental Statement, Volume 2. The assessment presented in Chapter 7 (Noise & Vibration) of the FEI Environmental Statement, Volume 1 has been updated to reflect the new Assessment and Rating of Wind Turbine Noise (June 2026) which has recently replaced ETSU-R-97.
Rochdale & Bury Bridleways Association	RBC: 24 th August 2025 RMBC: None received to date	Objection: The noise generated by the turbines will destroy the peace and tranquillity of the Pennine Bridleway and Mary Townley Loop.	A detailed response to these comments is provided at Annex 11 of Appendix 7.2 (Operational Noise Report) of the FEI Environmental Statement, Volume 2.
Whitworth Town Council (WTC)	RBC: 8 th September 2025 RMBC: None received to date	Objection: Raises an objection as a result of the predicted effects on residents' mental health due to the infrasound of the proposed turbines.	A detailed response to these comments is provided at Annex 11 of Appendix 7.2 (Operational Noise Report) of the FEI Environmental Statement, Volume 2.
Grosvenor Consultancy (Consultant on behalf of RMNF)	RBC & RMBC: 3 rd December 2025	Objection: Comments that the use of ERSU-R-97 as the primary framework for assessment is fundamentally flawed and the Noise Impact Assessment is materially inadequate and unsound, particularly with the absence of Operational Noise Contour Maps.	A detailed response to these comments is provided at Annex 11 of Appendix 7.2 (Operational Noise Report) of the FEI Environmental Statement, Volume 2. The assessment presented in Chapter 7 (Noise & Vibration) of the FEI Environmental Statement, Volume 1 has been updated to reflect the new Assessment and Rating of Wind Turbine Noise (June 2026) which has recently replaced ETSU-R-97.

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		• Considers it is unacceptable to not assess the Amplitude Modulation (AM) and Infrasound/Low Frequency Noise (ILFN). • Notes that the most significant contributor to noise complaints is sleep disturbance at night, and that there is no reliable evidence that wind turbines are safe at the proposed distances and noise levels. • Considers that the applicant is attempting to shift responsibility and costs onto LPAs by requiring the LPA to address unacceptable levels of AM via Statutory Nuisance powers.	

Chapter 8 Shadow Flicker

Metrica (Consultant on behalf of the LPA's)	RBC & RMBC: 9 th March 2026	Further detail is required on how shadow flicker out to 10x the tip height of the turbines is addressed, as per the Rossendale Borough Council validation checklist.	Although the Rossendale Borough Council validation checklist refers to ten times <i>tip height</i>, national policy only requires receptors within ten times the <i>rotor diameter</i> to be considered. Beyond this, no significant effects are expected to occur. Energy National Policy Statement EN-3, published by the Department for Energy Security and Net Zero, is the UK Government's National Policy Statement (NPS) for Renewable Energy. Paragraph 2.12.106 of NPS EN-3 states that: <i>"As a general rule, there is unlikely to be a significant impact at distances greater than ten rotor diameters from a turbine. Where wind turbines have been proposed within ten rotor diameters of an existing occupied building, a Shadow Flicker assessment should be carried out by the applicant."</i> Paragraph 2.12.167 of NPS EN-3 states: <i>"Where wind turbines are proposed that are ten rotor diameters and beyond from properties, the Secretary of State</i>
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			<i>should consider that the impacts are sufficiently diminished so as to have no significant impact on that property."</i>
		The potential for shadow flicker impact on the bridleways should also be addressed, as this is also a requirement of the RBC validation checklist.	The Rossendale Borough Council Validation Checklist states that: <i>"...the effects of Shadow Flicker on the users of bridleways within a 10 times turbine height radius should also be addressed".</i> The use of the term "shadow flicker" is incorrect in this context, as shadow flicker can only occur within buildings and not on open ground. There is no specific name for the phenomenon of shadows from wind turbine blades cast upon the ground, but is referred to here as "Shadow Cast". Neither NPS EN-1 or NPS EN-3, nor any other guidance document, require the assessment of shadow cast on open ground or on public rights of way, including bridleways, and there is no accepted methodology to define an appropriate assessment area or an assessment methodology for this effect. Accordingly, it is not appropriate or possible to assess the significance of these effects. There is no evidence to suggest that shadow cast effects pose a serious safety concern, and the presence of the existing Scout Moor turbines provides a strong precedent for equestrian coexistence. Shadow Cast is considered separately within the Planning and Access Statement but does not require to be considered further within the EIA process.
RMBC Public Rights of Way Officer	RBC: N/A RMBC: 12 th May 2026	Requests clarification on shadow cast and the impact on horses.	An assessment of the potential for Shadow Cast and its potential impact on horses / equestrians is included in Chapter 8 (Shadow Flicker) of the FEI Environmental Statement, Volume 1 and the Planning, Design & Access Statement .

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Pennine Bridleway Ranger (South Pennines)	RBC & RMBC: 4 th and 5 th September 2025 (via the Applicant)	Requested clarification in respect of the potential shadow cast effect on horses.	An assessment of the potential for Shadow Cast and its potential impact on horses / equestrians is included in Chapter 8 (Shadow Flicker) of the FEI Environmental Statement, Volume 1 and the Planning, Design & Access Statement .
Norden Area Forum	RBC: 23 rd October 2025 RMBC: None received to date	Raises an objection on the basis of the impact on the Pennine Bridleway and Mary Townley Loop, particularly regarding the effects of shadow cast on equestrians / horses.	An assessment of the potential for Shadow Cast and its potential impact on horses / equestrians is included in Chapter 8 (Shadow Flicker) of the FEI Environmental Statement, Volume 1 and the Planning, Design & Access Statement .
Norden, Bamford & Heywod Bridleways Association	RBC: 29th September 2025 and 4th October 2025 RMBC: 29th September 2025	There is concern from the Norden, Bamford & Heywod Bridleways Association that shadow cast resulting from the Proposed Development will cause horses to spook and bolt when using the bridleways that run through or near the Proposed Development. Of particular concern is the Mary Towneley Loop (MTL), which is reported to be narrow, and flanked by ditches, so horses run the risk of injury if they bolt in these locations. It has been asked if analysis could be undertaken to try and determine the effect the shadow cast might have on the MTL.	The British Horse Society (BHS), in its May 2025 guidance “Advice on Wind Turbines and Equestrian Access” confirms that Shadow Flicker applies only to buildings, but recognises that moving blade shadows on the ground may prompt hesitation or reaction in some horses. The BHS guidance states that, with regard to shadow flicker <i>“Most horses appear unperturbed, possibly because of the height of the movement and because the horse as a species does not have aerial predators so its senses are directed to ground dangers or to an animal dropping from a tree. Although the actual sweep of the blades covers a large area, it is not one that is immediately apparent even to humans, and most horses do not seem disturbed by it.”</i> The BHS guidance recommends a minimum separation distance of blade tip height plus 10% between commercial turbines and any equestrian route, which can be maintained with the proposed layout and tip height. The BHS guidance also highlights a range of site-specific factors that may influence how horses respond to turbines, including turbine orientation, surface type, visual enclosure, and the frequency or direction of shadows.

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			There is no evidence to suggest that shadow cast effects pose a serious safety concern to horses or bridleway users.
Chapter 9 Ecology			
Environment Agency (EA)	RBC: 22 nd September 2025 RMBC: 22 nd September 2025	Confirmed that the EA have no objection in principle to the Project for Assessment. However, requested further detail in respect of the proposed restoration techniques outlined in the Moorland Restoration & Management Plan and Habitat Management and Monitoring Plan particularly for: - 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.	- The location of proposed gully blocking is identified within Figure 9.8 of Environmental Statement, Volume 1 and within the Section 4.1 of the Moorland Restoration & Management Plan. - Species lists for plug planting and revegetation is included within Appendix B and C of the Moorland Restoration & Management Plan.
		In relation to riparian planting, the EA recommend that, in addition to native tree and shrub planting, enhancements should aim to create a more mixed mosaic of heathland, which is currently relatively rare habitat within the Assessment Boundary, in conjunction with species rich acid grassland.	As there is currently no loss of heathland habitats, inputting creation of these habitats in the Biodiversity Net Gain (BNG) metric has a negative impact on the habitat loss and trading standards as there is a higher obligation for species rich acid grassland to achieve BNG requirements. It is considered that additional measures could be included as part of the final Habitat Management and Monitoring Plan / BNG following consent, and the existing bog be managed to achieve this habitat.
Greater Manchester Ecology Unit (GMEU)	RBC: 10 th October 2025 RMBC: None received to date	Ecology Surveys: Advise that no further species surveys are required prior to deciding the Application, but additional surveys will be required pre-construction to ensure notable species are not	The Applicant agrees that further surveys will be required to be undertaken prior to the commencement of construction and that these will be secured through relevant planning conditions attached to the grant of planning permission.

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		harmed during works or during the operational stage of development. Long term habitat monitoring will be required.	The Outline Habitat Management & Monitoring Plan covers the requirement for long term habitat monitoring, with a detailed Habitat Management and Monitoring Plan to be secured via an obligation under the Section 106 Agreement.
		Impacts on Notable Habitats: - The Moorland Restoration and Management Plan should be regarded as an adaptive plan, able to respond to changes in local conditions. - The implementation of the Moorland Restoration and Management Plan should be overseen and monitored by suitably qualified persons during any construction period.	- The Moorland Restoration & Management Plan and Outline Habitat Management & Monitoring Plan have been updated to confirm that they are adaptive documents. The draft Section 106 Agreements include obligations to enable updates to these documents to be agreed with the Local Planning Authorities. - The implementation of the Moorland Restoration & Management Plan, as well as the BNG proposals set out under the Outline Habitat Management & Monitoring Plan, will be overseen by a qualified Ecological Clerk of Works (ECoW) – the details of which will be agreed with the Local Planning Authorities via planning condition. The Habitat Management Group will provide an independent review function and advise the Applicant and Local Planning Authorities, as set out in the draft Section 106 Agreements. - The need for ECoW and HMG has been detailed within Habitat Management and Monitoring Plan.
		Impacts on Notable Species – Badger: - A Method Statement must be required to be prepared giving details of how any harm to badgers is to be avoided during the course of works. - A precautionary, updated pre-commencement survey of the site for badgers is required to be	The Applicant agrees with the requirement for a Method Statement and updated pre-commencement badger survey – these can be secured via planning conditions attached to the grant of planning permission. This is reflected in Chapter 9 of the Environmental Statement, Volume 1.

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		undertaken within 3 months of any groundworks or site clearance works commencing.	
		Impacts on Notable Species – Water Voles: Where access roads will directly affect ditches and watercourses, GMEU would advise that further, dedicated surveys for water voles should be undertaken within the directly affected areas before work commences on crossing points.	The Applicant agrees with the requirement for an updated pre-commencement water vole survey – this can be secured via planning condition attached to the grant of planning permission. This is reflected in Chapter 9 of the Environmental Statement, Volume 1.
		Impacts on Notable Species – Other Mammals: - Regular site checks must be undertaken during works to ensure that mammals have not become trapped in works areas or excavations. - Gaps should be left in any security fencing around works compounds to allow for the free passage of mammals (e.g. foxes, hedgehogs, badgers). - Deer may use the site. Suitable gaps should be left in any security fencing during ground clearance and set-up works to ensure that deer do not become trapped in work areas.	The Applicant agrees with the requirement for regular site checks for mammals during construction, as well as leaving gaps in security fencing for the safe passage of mammals – this will be detailed in a Construction Environmental Management Plan (CEMP which will be secured via planning condition attached to the grant of planning permission. This is reflected in Chapter 9 of the Environmental Statement, Volume 1.
		Impacts on Notable Species: Reasonable Avoidance Method Statement should be required to be prepared by Condition providing details of measures to be taken to avoid harm to amphibians during construction works. Once agreed this method Statement should be implemented in full.	The Applicant agrees with the requirement for Reasonable Avoidance Method Statements – this can be secured via planning condition attached to the grant of planning permission. This is reflected in Chapter 9 of the Environmental Statement, Volume 1.

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		Biodiversity Net Gain (BNG): A comprehensive Biodiversity Gain Plan and a long-term Habitat Management and Monitoring Plan should be required to be provided by the statutory pre-commencement Biodiversity Gain Condition, which will apply to any permission which may be granted to the proposals.	The FEI Submission is supported by an updated BNG Assessment and Outline Habitat Management & Monitoring Plan. In accordance with statutory BNG, a detailed Biodiversity Gain Plan will be secured via planning condition attached to the grant of planning permission, and a detailed Habitat Management and Monitoring Plan will be secured via the Section 106 Agreement.
Natural England	RBC: 23rd January 2026 RMBC: 23rd January 2026	Confirmed that the previous EIA Scoping Report committed 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: - Whether this ratio applies only to the footprint of infrastructure that directly impacts the peat or if that includes the wider hydrologically affected area; - The extent of developer control over land management and grazing regimes;	- The ratio applies for direct impact however there are assessments and mitigation included within Chapter 9 of the Environmental Statement, Volume 1 for indirect impacts. - Common Land areas CL94 & CL99 will be fenced to enable the successful implementation of the 'Controlled Restoration' proposals set out in the Moorland Restoration & Management Plan and will therefore be deregistered as Common Land (and suitable replacement Common Land designated – subject to separate Common Land application); agreements are in place with the relevant landowners / graziers / Commoners to enable delivery of the Controlled Restoration proposals. The Moorland Restoration & Management Plan (Section 4.2) also identifies 'Community Restoration' proposals, which will be undertaken via agreements secured between the Applicant and landowners / graziers / Commoners.

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		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.	As set out in the Moorland Restoration & Management Plan restoration includes grip blocking and wider hydrological rewetting.
Lancashire Wildlife Trust (LWT)	RBC: 3 rd November 2025 RMBC: 28 th October 2025	Objection: - Confirms an objection primarily due to the loss of Annex 1 priority blanket bog habitat and that the Proposed Development would allow peat of up to 1m in depth to be stripped away. - Concerns the location of the development is within an area of the moors that modelling has shown to have the greatest potential for future restoration, which should be protected. - Considers other habitat types on deep peat soils are defined as degraded bog habitats, claiming the impact has been under-estimated. - Raises concerns regarding the MRMP and a belief that there needs to be significantly more net gain delivered in terms of blanket bog rewetting and restoration (at a ratio of 1:10). - Recommends that GMEU be consulted, particularly regarding the BNG assessment and analysis.	- The proposed new layout as part of the FEI Submission has greatly reduced the volume of peat to be excavated. All peat excavated will be reused and translocated within the Site itself. - The Applicant would agree that the area of the moors has good potential for restoration due to the level of current degradation and targeted measures presented in the Moorland Restoration and Management Plan. The level of degradation of the peatland currently suggests that the peatland will not recover naturally, and intervention is required to increase the quality of this habitat. The current use of the moor by overgrazing and off roading vehicles is having a negative impact on the habitats. - The habitat surveys were completed by sufficiently qualified ecologists, who followed best practice guidance and are members of CIEEM. We are confident that our findings and habitat classifications are accurate and reflect the habitats present on site. - The measures presented in the Moorland Restoration and Management Plan have been targeted to only apply in areas where they are likely to be successful. A site visit was undertaken and measures only suggested in places where it was sensible, realistic and able to be completed as per the

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			documents. More enhancement could have been included over the Site, but this would not have been realistic and could have included areas that were not suitable for peatland enhancement.
Rooley Moor Neighbourhood Forum (RMNF)	RBC & RMBC: 10 th September 2025	Objection: - Claims there is no clear demonstration of BNG or compliance with the Environment Act 2021. - Notes that four turbines and the substation are proposed to be within Biological Heritage Sites (of RBC), and the loss or degradation of these habitats would undermine local ecological network and contradicts with Rossendale's Green Infrastructure Strategy. - Notes that seven turbines are proposed at the Designated Sites of Ecological and Geological/Geomorphological Importance (of RMBC), and the proposal will cause ecological harm. - Requests information on how to avoid or mitigate adverse impacts on each of the designated sites affected.	- The BNG metric was completed following Department for Environment, Food and Rural Affairs (Defra) guidance and the requirements in the Environment Act 2021, which is the accepted guidance for completing a BNG metric. The metric is designed to only deal with direct loss and has been completed by a sufficiently qualified ecologist. - An updated layout has been submitted as part of the FEI submission, reducing the number of turbines in designated sites. Measures on how to avoid and mitigate adverse impacts to designated sites, as well as a full assessment of impacts is included in Chapter 9 of the Environmental Statement, Volume 1.
Chapter 10 Ornithology			
Greater Manchester Ecology Unit (GMEU)	RBC: 10th October 2025 RMBC: None received to date	Undertake pre-construction nest checks for breeding birds if construction works to take place between 1st March and 31st August inclusive.	Pre-construction nest checks for breeding birds will be conducted, as set out in Chapter 10 (Ornithology) of the FEI Environmental Statement, Volume 1 and will be secured via planning condition attached to the grant of planning permission.

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		In the 12 months before construction commences, breeding raptor surveys should be undertaken (and should also be carried out during construction if construction falls within a breeding season) with the aim of identifying the presence of any Annex I or Schedule 1 species which may be disturbed by the construction work.	Pre-construction breeding raptor surveys will be conducted, as set out in Chapter 10 (Ornithology) of the FEI Environmental Statement, Volume 1 and will be secured via planning condition attached to the grant of planning permission.
Lancashire Wildlife Trust (LWT)	RBC: 03 rd November 2025 RMBC: 28 th October 2025	With regard to the proposed fencing which is intended to support the peat moorland restoration, confirms that LWT is concerned that the amount of fencing proposed would create a significant predator shadow, which would have a deleterious impact on ground-nesting birds. We would therefore recommend that 'no fence' collars should be used instead of fencing.	Predator shadow is more usually associated with new woodland creation, as trees are a considerably taller landscape feature than fencing. The Proposed Indicative Fencing Layout with Access Point Locations plan identifies the intended alignment of fencing required to support the implementation of the restoration proposals presented in the Moorland Restoration & Management Plan . The final fencing layout and detailed specification is proposed to be secured via planning condition. The Applicant confirms that the final fencing specification will include, where practical and necessary, the use of predator-proof fencing.
Chapter 11 Landscape and Visual			
LUC (Consultant on behalf of the LPA's)	RBC & RMBC: Draft Report of 10 th February 2026	No Objection: Concluded that the submitted Landscape & Visual Impact Assessment (LVIA) (as presented at Chapter 11 of the submitted Environmental Statement) is technically sound, aligns with best practice and is therefore fit for purpose to support an informed planning decision by the LPA's, subject to a series of clarifications as set out below:	

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		LVIA1: clarify the study areas for different types of receptor and clarify which receptors have been scoped in and out (paragraph 11.9 of the LVIA Chapter is not clear because it states that changes to character and features and views from settlements within 10km are scoped out, which they don't seem to have been).	The Applicant notes that there was an errant double negative in paragraph 11.9 of the 2025 Environment Statement, which might have caused some confusion. There also was a lack of clarity of which receptors within 10km had been scoped out of the assessment for both landscape and visual receptors. This has been clarified in Chapter 11 (Landscape and Visual) of the FEI Environmental Statement, Volume 1.
		LVIA2: clarify which settlements have been scoped in and out with reasons (including confirmation of the relevance of 5km referenced in the LVIA). Clarify what the assessment for Sunnybank is.	The justification for scoping of certain receptors in and out of the assessment was included in the EIA Scoping Report (Appendix 2.1 of the FEI Environmental Statement, Volume 2). Chapter 11 (Landscape and Visual) of the FEI Environmental Statement, Volume 1 includes an assessment of all settlements within 10km where the effects are likely to be significant. There are some locations where topography or screening by intervening urban settlements would mean that significant effects were unlikely for some settlements within 10km. RMBC submitted a consultation response to the EIA Scoping Request which requested an additional viewpoint from 'Manchester Road (Sunnybank)' but without a specific grid reference/location. Intervening built elements and vegetation along Manchester Road would largely screen views of the Project for Assessment from Manchester Road, so an alternative location was proposed at Viewpoint 21, and this is located in a recreational greenspace at Sunnybank, on the northern edge of Whitefield, 11km away and effects would not be significant.
		LVIA3: explain how the final list of viewpoints has been selected with reference to any viewpoints requested as part of the scoping process, justifying inclusion or exclusion.	Firstly, LUC's comments on the EIA Scoping Request (dated 07 May 2025) were received after the 2025 Environmental Statement had been prepared and therefore Stephenson Halliday were unable to consider these viewpoint suggestions at the time of preparation. Feedback at EIA Scoping stage from

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			other consultees was taken into account in the viewpoints included in the 2025 Environmental Statement, which accounted for the additional seven viewpoints being added (refer to Appendices 2.2 and 2.3 of the FEI Environmental Statement, Volume 2). Given the degree of settlement and sheer number of potential receptors within the 45km study area, some pragmatism was required to keep the number of viewpoints at a proportionate level. In this case locations of viewpoints were prioritised on the basis of the locations where there was the greatest potential for significant effects or at the most sensitive receptors to illustrate the key findings of the Landscape & Visual Impact Assessment.
		LVIA4: confirm if the section called “Changes in views / visual amenity from designated landscapes” is actually presenting “Effects on special qualities of designated landscapes”.	That is correct and has been amended in the FEI – please refer to Chapter 11 (Landscape and Visual) of the FEI Environmental Statement, Volume 1.
		LVIA5: confirm the parameters upon which the hatched area has been defined on Figure 11.11 e.g. is it below a certain vertical angle from the lit nacelles?	Yes, this has been amended on Figure 11.11 of the FEI Environmental Statement, Volume 1 to read: <i>“Minimum -2° angle or greater, below the nacelle lights of all visible lit turbines. This area indicates where intensity of the aviation lights could be reduced to less than 42cd/ 420cd due to the vertical directional intensity mitigation of the light design. See Figure 4 and Table 4 of Appendix 3 of Guidance on Aviation Lighting Impact Assessment by NatureScot 2024”.</i>
		LVIA6: confirm whether the dusk/ dawn visualisations show 200 or 2000 candela lights and whether any vertical directional intensity mitigation has been shown as part of the visualisations (noting that viewpoints 2 and 6 are in the hatched area where vertical	As per the NatureScot guidance on Aviation Lighting Impact Assessment¹, automatic dimming to 200cd is included as embedded mitigation in the Proposed Development and therefore they have been represented in the dawn/dusk visualisation at 200cd. Also as recommended in this guidance, the photomontages have not attempted to illustrate the

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		directional intensity lighting would reduce brightness of lights once mitigation is applied).	gradual reduction in light intensity over distance, due to the difficulty in accurately illustrating this characteristic. Nor have Stephenson Halliday attempted to include any reduction due to the vertical directional intensity mitigation. The aviation lights have been illustrated to clearly be seen in the photomontages, and as with all visualisations there is a degree of interpretation in the illustration of the lights.
		LVIA7: clarify whether Norden and Wolstenholme and the northern edge of Rochdale, which are included in the applicant's list of 'more distant' settlements (at paragraph 11.513 of the LVIA), should be in the list or if the paragraph needs rewording (because they are relatively close to the site).	Agree that this needed re-phrasing to just other settlements and this has been amended in the FEI – please refer to Chapter 11 (Landscape and Visual) of the FEI Environmental Statement, Volume 1.
		LVIA8: confirm what tower diameter is shown in the photo-wirelines (the towers look very 'chunky' in these wirelines).	The turbines in the wirelines are drawn using default parameters in Resoft Windfarm software and are calculated as follows: - Tower bottom radius = 4.5% of hub height = 4.75m - Tower top radius = 2.5% or blade diameter = 3.73m
		LVIA9: Figure 11.10 Design Analysis - has setting T1 back from Whitworth been considered (as well as setting T4 back)?	This note was meant to refer to all the turbines on the eastern edge; Figure 11.10 of the FEI Environmental Statement, Volume 1 has been updated as part of this FEI Submission.
		LVIA10: provide additional information about the reason for siting the substation on a northern slope rather than in the centre of the site with specific reference to landscape and visual reasons (for example were visibility studies undertaken?)	A description of the rationale for the onsite substation location is included in Chapter 5 (Consideration of Alternatives) and Chapter 11 (Landscape and Visual) of the FEI Environmental Statement, Volume 1, as well as Chapter 6 of the Planning, Design & Access Statement . The onsite substation has been micrositied as part of the FEI Submission (to avoid peat), but the general location remains similar. A new

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			viewpoint (No. 25) has been included to provide an illustration of the onsite substation.
		LVIA11: consider a layered, mixed broadleaf and conifer planting strategy for the screening around the proposed substation.	This was an error in reporting and it has been corrected in the FEI, refer to Figure 4.16 of the FEI Environmental Statement, Volume 1 which shows mixed predominantly broadleaf woodland planting. This is also reflected in the Biodiversity Net Gain Assessment and Outline Habitat Management & Monitoring Plan .
		LVIA12: use muted colours to blend the structures (e.g. substation, fencing) with their environment – the landscape consultant should propose suitable colours for this particular environment, with justification for agreement with the Council, including use of local materials where possible. The applicant should confirm what is intended.	As set out in Chapter 7 of the Planning, Design & Access Statement , external finishes to the building will utilise locally sourced materials in a style that compliments the local vernacular and colours will be in a muted colour to blend the with their environment, the detail of materials for the onsite substation will be confirmed pursuant to a planning condition.
		LVIA13: restore stone walls where possible (in accordance with SEO 2 for NCA 36) – the applicant should confirm which stone walls will be restored and where this is set out within the application	The Outdoor Access Management & Enhancement Plan has been updated to confirm that stone walls around the proposed Moor Cock Inn Rest Area will be restored, with the precise location and specification to be agreed pursuant to a planning condition.
		There was also a recommended set of additional viewpoints, most of which came from LUC's EIA Scoping Comments which were published after the 2025 ES had been prepared.	A response to these additional requests has been included in the revised Appendix 11.4 (Viewpoint Analysis) of the FEI Environmental Statement, Volume 2. These additional viewpoints have been included as Appendix 11.6 (Illustrative Wirelines) of the FEI Environmental Statement, Volume 2.

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		Proposed that if the LPA's were to approve the Applications planning conditions should be applied related to landscape planting to the substation; material finishes (for substation and fencing); restoration of stone walls; and reduced lighting scheme.	The Applicant agrees with the recommended conditions and will liaise with RBC and RMBC to agree appropriate wording in the event of planning permission being granted.
Natural England	RBC: 23 rd January 2026 RMBC: 23 rd January 2026	Neutral: The Applicant notes that the comments raised by Natural England in relation to the Landscape and Visual Impact Assessment, as assessed in Chapter 11 of the Environmental Statement, relate to the previous EIA Scoping Report.	A response to Natural England's comments on the EIA Scoping Report is supplied in Appendix 2.2 of the FEI Environmental Statement, Volume 2. The Applicant considers that all matters are addressed as part of this FEI Submission but welcomes comments on detailed LVIA presented in Chapter 11 (Landscape and Visual) of the FEI Environmental Statement, Volume 1.
Burnley Borough Council	RBC: 8 th September 2025 RMBC: 11 th September 2025	Neutral: Requests photographs/ wireline drawings from within Burnley to consider the impact upon the Borough.	As illustrated in the ZTVs in Figure 11.5 to Figure 11.8 of the FEI Environmental Statement, Volume 1, there would be little or no visibility within the town of Burnley and therefore we have not included any viewpoints for this settlement. There would only be some visibility from the edges of the Borough Council's area on the moors. There is one wireline included at Hameldon Hill, in Appendix 11.7 (Illustrative Wirelines) of the FEI Environmental Statement, Volume 2, which is on the southern edge of the Borough Council's area.
Hyndburn Borough Council (HBC)	RBC: 13 th November 2025 RMBC: 13 th November 2025	Neutral: Notes that the submitted Environmental Statement (ES) indicates that parts of all the proposed turbines would be visible from certain parts of Hyndburn, particularly the rural areas to the south of Accrington and its townships, and northwest of Great Harwood and Rishton. The ES acknowledges that Hyndburn is home to	There are numerous operational wind farms in the area, as illustrated on Figure 11.4 of the FEI Environmental Statement, Volume 1, and Hyndburn is included. These wind farms are also included in the wirelines for all viewpoints. The Applicant acknowledges the comments of HBC and invites the LPAs to have due regard to these in their determination of the Application.

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		Hyndburn Windfarm and demonstrates the cumulative impact of the proposal alongside existing operational windfarms. This demonstrates that many of the views of the proposed turbines from within Hyndburn would be experienced within the context of Hyndburn Windfarm. Trust that the LPA's will give due regard to the adverse impacts on Hyndburn in their decision making.	
National Trust	RBC: None received to date RMBC: 10 th October 2025	Objection: Notes that several National Trust assets may experience landscape and visual effects and raises queries in relation to the impacts upon landscape character and visual receptors on Holcombe Moor.	Full consideration of the impact on the National Trust assets have been included in Chapter 11 (Landscape and Visual) of the FEI Environmental Statement, Volume 1, with 2 viewpoints included on or near their land holding.
Rooley Moor Neighbourhood Forum (RMNF)	RBC & RMBC: 14 th August 2025	Objection: - Concludes that the proposed wind turbines would cause significant adverse effects (individually and cumulatively) on landscape character and visual amenity, owing to their prominence in short-range and long-distance views. - Notes that the turbines' siting near the moor edge fails to integrate with the existing layout and would erode the openness and serenity that define the landscape.	The Applicant acknowledges the comments of RMNF and invites the LPAs to have due regard to these in their determination of the Application. A full professional assessment of the landscape & visual impacts of the Proposed Development is set out in Chapter 11 (Landscape and Visual) of the FEI Environmental Statement, Volume 1 and on residential receptors in the Residential Visual Amenity Assessment .
	RBC & RMBC: 10 th September 2025	Objection: Comments that the application does not provide adequate visual impact assessments from	

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		sensitive receptors, such as Rooley Moor and the Cotton Famine Road.	
Norden Area Forum	RBC: 23 rd October 2025 RMBC: None received to date	Objection: - Considers that the Proposed Development would have a devastating detrimental impact on the landscape. - Requested photomontages from Red Lumb, Greenbooth Village, Edenfield Road, St James Church Ashworth, M627, Shawfield and all along Rooley Moor Road.	It has not been possible to include viewpoints or visual illustrations from each potential receptor or location within the local area with visibility. The FEI Environmental Statement includes a set of representative viewpoints which are used to illustrate the nature and range of views from different directions and distances. Viewpoint 11 is on Edenfield Road, near Red Lumb. Viewpoint 3 is from the Greenbooth Reservoir car park on the eastern side of the reservoir. The impact on St James Church, Ashworth is assessed within Chapter 12 (Built Heritage) of the FEI Environmental Statement, Volume 1. There is an illustrative wireline from Tandle Hill Country Park in Appendix 11.7 (Illustrative Wirelines) of the FEI Environmental Statement, Volume 2, which is near the A627(M). Viewpoint 14 is located at Norden Cricket Ground, which is not far from Shawfield.
Norden, Bamford & Heywood Bridleways Association (NBHBA)	RBC: 29 th September 2025 and 4 th October 2025 RMBC: 29 th September 2025	Objection: Considers that the Proposed Development would result in severe visual impacts to the immediate vicinity of the Site and across Greater Manchester, Lancashire and West Yorkshire.	The Applicant acknowledges the comments of NBHBA and invites the LPAs to have due regard to these in their determination of the Application. A full professional assessment of the landscape & visual impacts of the Proposed Development is set out in Chapter 11 (Landscape and Visual) of the FEI Environmental Statement, Volume 1 and on residential receptors in the Residential Visual Amenity Assessment.
Whitworth Town Council (WTC)	RBC: 8 th September 2025 RMBC: None received to date	Objection: Raises an objection as a result of the predicted visual impact on Whitworth.	The Applicant acknowledges the comments of WTC and invites the LPAs to have due regard to these in their determination of the Application. A full professional assessment of the landscape & visual impacts of the Proposed Development is set out in Chapter 11 (Landscape and Visual) of the FEI Environmental

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			Statement, Volume 1 and on residential receptors in the Residential Visual Amenity Assessment.
Chapter 12 Built Heritage			
Historic England	RBC: None received to date RMBC: 2 nd October 2025	No Objection: - Confirms that the built heritage chapter of the 2025 ES has been compiled in accordance with current best practice and to have consulted all relevant sources of information. - Confirmed that study areas are appropriate for the identification of significant impacts resulting from the construction and operation of the Project for Assessment.	The Applicant acknowledges the comments of Historic England and invites the LPAs to have due regard to these in their determination of the Application.
Growth Lancashire (Built Heritage advisors to RBC)	RBC: 5 th December 2025 RMBC: N/A	No Objection: Although there are some slight variations in the category of harm (e.g. limited, low, medium /moderate etc) ascribed in the Heritage Assessment and the Growth Lancashire Assessment, Growth Lancashire confirmed agreement that the Project for Assessment would result in less than substantial harm to the following assets - Cloughfold Conservation Area - Church of St Bartholomew (Grade II listed building) - Whitworth Square Conservation Area - Church of St Saviour, Bacup (Grade II listed building) - Church of St Nicholas with St John (Grade II* listed building) - Whitworth Cemetery Grade II RPG	The Applicant acknowledges the comments of Growth Lancashire and invites RBC to have due regard to these in their determination of the Application. This harm is factored into the heritage and planning balance presented within the Planning, Design & Access Statement .

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		• North Chapel, Whitworth Cemetery (Grade II listed building) • Cemetery Chapel, Whitworth Cemetery (Grade II listed building) • South Chapel, Whitworth Cemetery (Grade II listed building) • Lee Farmhouse (Grade II listed building)	
		Confirmed agreement that the Project for Assessment would result in harm to the setting of Rooley Moor Road NDHA.	The Applicant acknowledges the comments of Growth Lancashire and invites RBC to have due regard to these in their determination of the Application. This harm is factored into the heritage and planning balance presented within the Planning, Design & Access Statement .
		Requested that photomontages showing the turbines in relation to the following assets should be provided: • Lower Lench Farmhouse (Grade II) • Lower Top O'th'bank Farmhouse (Grade II) • Old Farmhouse c 50m south-west of present Cowpe Hall Farmhouse (Grade II) • Church of St John the Evangelist, Facit (Grade II) • Fairwall Farmhouse (Grade II) • Barn c. 20m west of Fairwall Farmhouse (Grade II) • Moss Meadows Farmhouse (Grade II) • Old House Farmhouse (Grade II) • The End Cottage, The Old Stables and The Barn, Tippetts Farm (Grade II)	Appendix 12.1 (Heritage Assessment) of the FEI Environment Statement, Volume 2 provides wireframe visualisations and reference photography for the locations requested.

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		- Higher Lench Farmhouse (Grade II) - Rough Lee Cottages (NDHA) - Rough Lee House and Gates (NDHA) - Lower Foldhead Farm (NDHA) - Fairwell Cemetery, Off Brunswick Terrace, Bacup (Potential NDHA)	
		Queried whether there is potential for the Project for Assessment to cause harm to the setting of other heritage assets not included within the assessment.	- Turley (as the appointed Built Heritage Consultant) provided clarification of the methodology for excluding assets from the assessment (email dated 25 January 2026). - Growth Lancashire confirmed following review of this information that they had not identified any additional assets requiring assessment (email dated 13th March 2026). - Growth Lancashire noted (email dated 27 January 2026) that Waugh's Well (a NDHA) is very close to the Main Site but had not been picked up in any assessments. An assessment of the impacts upon Waugh's Well is included in Appendix 12.1 (Heritage Assessment) of the FEI Environmental Statement, Volume 2.
RMBC Conservation & Design Team	RBC: N/A RMBC: 6 th January 2026	No Objection: The RMBC Conservation Officer agreed with the assessment of impacts of the Project for Assessment as set out in the Heritage Assessment for the following assets: - Clegg Village Conservation Area - Clegg Hall (Grade II* listed building) - Healey Hall (Grade II listed building) - Church of Christ (Grade II listed building)	The Applicant acknowledges the comments of the RMBC Conservation & Design Team and invites RMBC to have due regard to these in their determination of the Application. This harm is factored into the heritage and planning balance presented within the Planning, Design & Access Statement .

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		- Owd Betts Public House (Grade II listed building) Although there are some slight variations in the category of harm (e.g. limited, low, medium /moderate etc) ascribed in the Heritage Assessment and the RMBC Conservation Officer's assessments, the RMBC Conservation Officer confirmed agreement that the Project for Assessment would result in less than substantial harm to the following assets: - Catley Lane Head Conservation Area - Prickshaw and Broadley Fold Conservation Area - Prickshaw Cottages (Grade II listed building) - Smallshaw Farmhouse (Grade II listed building) - Fern Hill First Farmhouse (Grade II listed building) - Fern Hill Cottage (Grade II listed building) - Fern Hill Farm and Hamlet (NDHA) - Higher Dunishbooth (NDHA) - Lower Dunishbooth (NDHA) - Crofthead (NDHA)	
		Confirmed agreement that the Project for Assessment would result in harm to the setting of Rowley Moor Road NDHA. Noted the potential for partial mitigation through repairs to areas of Rooley Moor Road (identified through a schedule of repairs) to prevent deterioration and secure this important heritage asset for the future.	The Applicant acknowledges the comments of the RMBC Conservation & Design Team and invites RMBC to have due regard to these in their determination of the Application. This harm is factored into the heritage and planning balance presented within the Planning, Design & Access Statement. The Applicant will prepare Written Schemes of Investigation (WSIs) for each stage of post determination archaeological investigation and this will include the proposed approach to

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			recording and archaeological monitoring in relation to repairs required to Rooley Moor Road. The requirement for the submission and approval of a WSI prior to the commencement of any archaeological investigation is proposed to be secured pursuant to a planning condition to be attached to the grant of planning permission.
		Noted the following additional heritage assets which should be included in the Heritage Assessment - Hunger Hill Farm NDHA - Proposed Syke Conservation Area <i>[the conservation area has now been designated]</i> Noted that impacts upon Waugh's Well NDHA (located within the adjacent RBC area) had not been assessed.	Assessments of the impacts upon Hunger Hill Farm NDHA and the Syke Conservation Area are included in Appendix 12.1 (Heritage Assessment) of the FEI Environmental Statement, Volume 2. An assessment of the impacts upon Waugh's Well is included in Appendix 12.1 (Heritage Assessment) of the FEI Environmental Statement, Volume 2.
		Requested additional information about the methodology used to exclude heritage assets from assessment in cases where there is predicted intervisibility with the Project for Assessment.	Turley (as the appointed Built Heritage Consultant) provided clarification of the methodology for excluding assets from the assessment, including the locations where this information could be found within the application documentation (email dated 26 th January 2026).
		Noted that additional visualisations would help inform the assessment of impacts. Turley (as the appointed Built Heritage Consultant) raised a series of clarification questions (email dated 26th January 2026). The response from RMBC Conservation Officer (email received 5th March 2026) requested the following items: Additional information to understand the impact of the Project for Assessment upon views from	In response to these comments, the Applicant confirms: - Additional information is set out in Chapter 12 (Built Heritage) of the FEI Environmental Statement, Volume 1 (Paragraphs 12.17 – 12.18) - The assessment of impacts upon the Prickshaw and Broadley Fold Conservation Area, including consideration of the key views as identified in the Conservation Area Appraisal is set out in Chapter 12 (Built Heritage) of the FEI Environmental Statement, Volume 1.

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		the town centre [Rochdale] towards the moorlands at the Pennines Fringe. - Requested the key views identified in the Prickshaw and Broadley Fold Conservation Area Appraisal to be addressed in the documents. - Requested a wireframe visualisation from Fernhill.	A wireframe visualisation from Fernhill is provided in Appendix 12.1 (Heritage Assessment) of the FEI Environmental Statement, Volume 2.
Burnley Borough Council	RBC: 8th September 2025 RMBC: 11th September 2025	Neutral: Request assessment of impacts upon the setting of heritage assets within Burnley, although notes that a Heritage Statement is provided with the Application which identifies designated and non-designated heritage assets within 15km of the Main Site with the potential to be affected by the Project for Assessment.	The Applicant acknowledges the comments of Burnley Borough Council and invites the LPAs to have due regard to these in their determination of the Application. A full professional assessment of the built heritage impacts of the Proposed Development is set out in Chapter 12 (Built Heritage) of the FEI Environmental Statement, Volume 1 and Appendix 12.1 (Heritage Assessment) of the FEI Environmental Statement, Volume 2. The Heritage Assessment and associated appendices provide full details of the methodology for excluding heritage assets from the assessment.
Norden Area Forum	RBC: 23rd October 2025 RMBC: None received to date	Objection: Considers that there will be unnecessary and totally avoidable detrimental effects on the Prickshaw and Broadley Fold Conservation Area, the historic Cotton Famine Road and Waugh's Well, none of which the Forum consider can be suitably mitigated.	The Applicant acknowledges the comments of Norden Area Forum and invites the LPAs to have due regard to these in their determination of the Application. A full professional assessment of the built heritage impacts of the Proposed Development is set out in Chapter 12 (Built Heritage) of the FEI Environmental Statement, Volume 1 and Appendix 12.1 (Heritage Assessment) of the FEI Environmental Statement, Volume 2.
Prickshaw & Broadley Fold Conservation Area	RBC: 20th September 2025	Objection: Raises an objection in respect of the impact of the Proposed Development on	The Applicant acknowledges the comments of Prickshaw & Broadley Fold CA and invites the LPAs to have due regard to these in their determination of the Application. A full professional assessment of the built heritage impacts of the

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	RMBC: None received to date	the Prickshaw and Broadley Fold Conservation Area.	Proposed Development is set out in Chapter 12 (Built Heritage) of the FEI Environmental Statement, Volume 1 and Appendix 12.1 (Heritage Assessment) of the FEI Environmental Statement, Volume 2.
Rooley Moor Neighbourhood Forum (RMNF)	RBC: 14 th August 2025 RMBC: None received to date	Objection: - Raises an objection in respect of the harm the Proposed Development would cause to the setting of multiple designated heritage assets, in particular the Prickshaw & Broadley Fold Conservation Area and the Catley Lane Head Conservation Area. - Notes that the Proposed Development would compromise the fabric, character and appearance of Rooley Moor Road, eroding its historic integrity and diminishing its role in the cultural and landscape heritage of the area. - Considers that the application doesn't include a robust analysis of the setting and claims that Historic England guidance has been disregarded - Considers the public benefits of the Proposed Development do not outweigh the harm to the heritage assets.	The Applicant acknowledges the comments of RMNF and invites the LPAs to have due regard to these in their determination of the Application. A full professional assessment of the built heritage impacts of the Proposed Development is set out in Chapter 12 (Built Heritage) of the FEI Environmental Statement, Volume 1 and Appendix 12.1 (Heritage Assessment) of the FEI Environmental Statement, Volume 2. The identified harm is factored into the heritage and planning balance presented within the Planning, Design & Access Statement .
Chapter 13: Archaeology			
Greater Manchester Archaeology Advisory service (GMAAS)	RBC: N/A RMBC: 24 th September 2025	- Agree with the 2025 ES's assessment of known and potential heritage asset significance. - Recommend that a staged programme of archaeological work is conditioned upon planning consent, should it be granted, that involves: topographic and earthworks survey and initial intrusive investigation prior to	The Applicant will prepare Written Schemes of Investigation (WSIs) for each stage of post determination archaeological investigation. The requirement for the submission and approval of a WSI prior to the commencement of any archaeological investigation is proposed to be secured pursuant to a planning condition to be attached to the grant of planning permission.

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		development commencement, and; archaeological monitoring and recording during development ground works. • Welcome commitment to implementing a programme of geoarchaeological investigation in the form of a purposive borehole sampling survey around Cowpe Moss. • Notes that the Proposed Development provides an opportunity to devise proposals for public outreach benefits relating to the archaeological / historic heritage. This is particularly appropriate regarding the extensive industrial remains that exist in the northern part of the Site. The extensive industrial remains in the area are a visible and historically interesting heritage asset. Public interpretation of this asset would contribute towards promoting a legacy of public engagement whilst benefitting heritage, tourism, local education and health agendas. Such interpretation could take the form of history trails, guided tours, information booklets and boards, and local museum displays. • Requests that a pre-commencement planning condition relating to the submission and approval of an Archaeological WSI be applied to any grant of planning permission.	GMASS will be consulted by the Local Planning Authority on any application to discharge a WSI-related condition. Further detail on the proposed approach to public engagement as part of the future archaeological investigation is included in Chapter 13 (Archaeology) of the FEI Environmental Statement, Volume 1 and in Appendix 13.1 Archaeological Desk Based Assessment of the FEI Environmental Statement, Volume 2. This will be developed as part of the production of the WSI(s) and GMASS will be consulted on this.
Lancashire County Council Historic Environment Team (LCCHET)	RBC: 25 th September 2025 RMBC: N/A	No Objection: • Broadly agree with the characterisation of the archaeological potential for, and the significance	The Applicant will prepare Written Schemes of Investigation (WSIs) for each stage of post determination archaeological investigation. The requirement for the submission and approval of a WSI prior to the commencement of any archaeological investigation is proposed to be secured pursuant to a planning

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		of, any remains likely to be encountered across the Site. - Advised that detailed 'as existing' topographic survey should be undertaken of all areas to be subject to any groundworks and to include those areas of the Rooley Moor where it will be crossed by the internal site track to ensure that if damaged it can be returned to its original condition. - Post-permission works should be timetabled in such a way that any evaluation stage can be properly written up, complete with specialist reports, and any new Written Scheme of Investigation (WSI) required for any subsequent stage or stages of archaeological mitigation can be drawn up and those works fully implemented and completed prior to construction commencing. - Requests that a pre-commencement planning condition relating to the submission and approval of an Archaeological WSI be applied to any grant of planning permission.	condition to be attached to the grant of planning permission. GMASS will be consulted by the Local Planning Authority on any application to discharge a WSI-related condition. Further detail on the proposed approach to public engagement as part of the future archaeological investigation is included in Chapter 13 (Archaeology) of the FEI Environmental Statement, Volume 1 and in Appendix 13.1 (Archaeological Desk Based Assessment) of the FEI Environmental Statement, Volume 2. This will be developed as part of the production of the WSI(s) and LCCHET will be consulted on this.
Historic England	RBC: 2 nd October 2025 RMBC: 2 nd October 2025	Neutral: - Broadly agree with the Applicant's assessment of the known and potential significance of heritage assets within the Site. - Recommend a phased programme of archaeological work to be secured by planning condition with details to be set out in a WSI, to be approved in writing by the planning	The Applicant will prepare Written Schemes of Investigation (WSIs) for each stage of post determination archaeological investigation, which will include the proposed approach to geoarchaeological sampling. The requirement for the submission and approval of a WSI prior to the commencement of any archaeological investigation is proposed to be secured pursuant to a planning condition to be attached to the grant of planning permission. Historic England will be consulted by the

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		authorities in consultation with their archaeological advisors. • Would welcome further consultation of the design of the proposed programme of geoarchaeological around Cowpe Moss • There is a need to acknowledge any indirect impacts of drainage works on the preservation of archaeological deposits during mitigation.	Local Planning Authority on any application to discharge a WSI-related condition. Further detail on drainage impacts is included in in Chapter 13 (Archaeology) of the FEI Environmental Statement, Volume 1.
Council for British Archaeology (CBA)	RBC: 10th September 2025 RMBC: None received to date	No Objection: • The archaeological potential of the Site was identified in AOC's Archaeological DBA. This includes prehistoric activity, an old routeway (modified in the C19th) and 2m peat deposits which have the potential to conserve significant paleoenvironmental information. Likely post medieval deposits are also identified, which whilst not as objectively remarkable are unquestionably of interest to local people. • Supports recommendation for proportionate archaeological evaluation based on findings from intrusive archaeological evaluation • Advise that the infrastructure layout should be responsive to the findings of further archaeological evaluation in order to minimise harm to archaeological deposits and their future preservation. • Advocate for public participation opportunities to form part of archaeological mitigation strategies in order to enhance the delivery of public benefits for people, especially locally.	The Applicant will prepare Written Schemes of Investigation (WSIs) for each stage of post determination archaeological investigation. The requirement for the submission and approval of a WSI prior to the commencement of any archaeological investigation is proposed to be secured pursuant to a planning condition to be attached to the grant of planning permission. GMASS will be consulted by the Local Planning Authority on any application to discharge a WSI-related condition. Further detail on the proposed approach to public engagement as part of the future archaeological investigation is included in Chapter 13 (Archaeology) of the FEI Environmental Statement, Volume 1 and in Appendix 13.1 (Archaeological Desk Based Assessment) of the FEI Environmental Statement, Volume 2. This will be developed as part of the production of the WSI(s) and CBA will be consulted on this. The proposed micro-siting allowance would allow for some infrastructure components to be re-positioned should archaeological remains which require preservation in situ be discovered as part of the archaeological investigation.

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		Participation with on site evaluation, interpretation and dissemination to broaden a shared advancement in understanding and advise engagement with The Rossendale Civic Trust and others with respect to archaeological evaluation and enhanced understanding of the historic environment as part of the Project for Assessment.	
Chapter 14: Hydrology, Hydrogeology and Peatland			
JBA Consulting (on behalf of RBC & RMBC)	RBC & RMBC: 12 May 2026 (but received in draft by the LPA's and Applicant on 29 January 2026 and 23 April 2026)	Peat assessment and impact significance: • Impact criteria should align with Natural England definition of deep peat (>0.3 m) • Further justification required for magnitude of impact methodology, including study area definition • Concern that impact significance may be understated	• The assessment uses the 0.3m threshold for peat which has been applied both for infrastructure layout iteration as well as the assessment. The magnitude of impact methodology has been developed in the assessment of numerous rural development sites across Scotland and Wales and is considered appropriate and robust for England. It is described in detail in the Methodology section of Chapter 14 Hydrology, Hydrogeology and Peat of the Environmental Statement and the premiss that the grading of sensitivity and magnitude of impact on peat must increase for deeper peat and increasing volumes of peat against a benchmark, in this case considered to be the peat survey area. • The magnitude of peat impact is based on a proportionate, quantitative approach, whereby: – The absolute volume of peat disturbed is assessed as a proportion of the total peat resource within the Assessment Boundary. – Defined thresholds (2%, 5%, 10%) are used to determine magnitude.

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			• This approach provides a transparent and consistent method for assessing significance and ensures impacts are evaluated at a site-wide scale, rather than on the basis of isolated locations. • The methodology is independent of any single peat depth threshold, and therefore remains robust in the context of varying definitions of “deep peat” (e.g. >0.3m as per Natural England guidance or >0.4 m as per Rossendale Local Plan Policy ENV7), which are instead reflected within the sensitivity classification. • The use of a proportion-of-resource approach ensures that magnitude is not overstated at a local scale while still capturing the overall effect on the peat resource, providing a balanced and proportionate assessment consistent with EIA practice. • Importantly, this is coupled with a management assumption of reuse and restoration, as set out in the Appendix 14.3: Outline Peat Management Plan, ensuring that disturbed peat is appropriately managed and reinstated wherever practicable.
		Infrastructure siting and layout: • Limited transparency on how constraints (peat, hydrology, ecology) have been balanced • Specific concerns regarding: – Turbines located within deep peat and eroding areas – Substation location on peat >0.3m – Tracks not clearly aligned with peat depth data	• A detailed overview of the design evolution process is set out in Chapter 5: Consideration of Alternatives as well as in Section 6 of the Planning, Design & Access Statement. This process has been guided by detailed technical assessment work across all disciplines and included high density peat probing surveys. These surveys identified peat depths across the Site, including areas of peat depth >0.3m. • The layout has been developed through an iterative design process, informed by environmental constraints including: – Peat depth and condition.

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		• Apparent lack of design evolution despite updated peat surveys	– Watercourses and buffers. – Topography and engineering constraints. • The design seeks to: – Avoid the deepest peat where practicable to minimise volumes to be extracted. – Use floating tracks to minimise disturbance. – Maintain hydrological continuity. • The Applicant recognises that complete avoidance of peat is not feasible within a moorland environment, and that the design represents an appropriate balance of constraints. • Siting infrastructure in eroded areas of peat allows the potential for stabilisation of the peat resource in that area and is preferable to more intact areas of peat as these areas will continue to erode and the peat bog will further decrease as is clearly evident from historical mapping. • The substation has been relocated off peat. • Tracks have been aligned to minimise land take, avoid the best quality peat, the deepest peat and exploit areas of actively eroding peat to allow restoration as shown on Figure 14.11: Peatland Condition Assessment.
		Ground investigation and data gaps: • Reliance primarily on peat probing; recommend: – Further intrusive GI (coring, boreholes) – Groundwater monitoring – Improved understanding of hydrology and flow pathways	• The assessment of impact on peat presented in Chapter 14 is supported by extensive field data collection, including: – Multi-phase peat probing campaigns (over 11,000 probes) (Appendix 14.2: Peat Survey Report). – Peat condition mapping and hydrology walkovers. – Detailed geomorphological and stability assessment (Appendix 14.4: Peat Landslide Hazard Risk Assessment).

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			• This provides a high-resolution understanding of peat distribution, condition and stability, which is considered proportionate at this stage of assessment. • The mapping of peat depth has been primarily based on peat probing as this is widely considered to provide worst case depth information. Probe depths are occasionally overestimates where soft silty deposits can unknowingly penetrated by the peat probe. • Further intrusive investigation including coring and boreholes are appropriate at detailed design stage to understand the subsurface conditions prior to construction for detailed engineering and can be secured via planning conditions. • Groundwater monitoring will be undertaken in association with peat restoration to demonstrate improvements to the peat habitat through the raising of groundwater levels – this is proposed to be secured via planning condition. • Any interruption of flow pathways will be managed through the drainage management plan so that greenfield flow rates are maintained and any increase in runoff is directed to structures which will provide slow release of water over time. Any interruption of groundwater flows will be managed through regular drainage across infrastructure with subsequent diffuse dispersal of flows downgradient to maintain the saturation levels within the peat or other substrate and to maintain water within the same sub-catchment.
		Peat management and restoration: • Further justification required for:	• A comprehensive approach to peat management is established within the following documents: – Appendix 14.3: Outline Peat Management Plan.

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		– Peat translocation to Cragg Quarry, including feasibility – Material handling and suitability of receptor environment • Suggest consideration of alternative restoration approaches (e.g. bunding) • Clarification required on whether restoration extends outside planning boundary	– Supported by Appendix 14.1: Good Practice Methods • This includes: – Handling and reuse of excavated peat. – Restoration and reinstatement of disturbed areas. • Detailed justification and feasibility for peat reuse and restoration, including at Cragg Quarry, is addressed at a strategic level at EIA stage in the Appendix 14.3: Outline Peat Management Plan. A detailed Peat Management Plan will be developed prior to the commencement of any peat excavation works – this will be secured via planning condition. • Bunding is included as part of the package of restoration measures as substantial groundworks and water management are required to be implemented with low permeability material (clay) used to encapsulate the translocated peat to maintain saturation. • All restoration proposals will occur within the boundary of the Site as shown on Figure 14.10 Peat Restoration Areas in Volume 1 of the FEI Environmental Statement.
		Water environment and receptors: • GWDTE assessment requires: – Further groundwater monitoring – Input from Natural England / County Ecologists • PWS assessment is high-level and requires: – More robust methodology – Potential monitoring and quantitative assessment	• Effects on water environment receptors are assessed in: – Appendix 14.6: Private Water Supplies Assessment – Appendix 14.7: Public Water Supplies Assessment – Appendix 14.8: GWDTEs Assessment • Potential impacts are mitigated through: – Embedded design measures. – Appendix 14.1: Good Practice Methods. • Appendix 14.8: Groundwater Dependent Terrestrial Ecosystems (GWDTE) Assessment has demonstrated no substantial groundwater dependency for any of the habitats due to lack of connectivity to infrastructure or low

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		Recommend development of a Surface Water Management Plan (SWMP) including monitoring.	permeability geology indicating a lack of groundwater resource to support the habitats. Neither Natural England or GMEU as County Ecologist did not raise concerns regarding the GWDTE assessment. A planning condition requiring additional monitoring at the one location where there may be hydrological connectivity, as presented would be acceptable to the Applicant. Appendix 14.6: Private Water Supplies Assessment is high level as there is no pathway from source to receptor and therefore the likelihood of any connectivity or potential for alteration of flow or quality to the sources is unlikely. - A Water Monitoring Plan and SWMP will be developed which will include monitoring of each of the identified water supplies – this will be secured via planning condition.
		Micrositing and mitigation: - Need clearer constraints for micrositing: - Avoid movement into deeper peat - Avoid encroachment into sensitive hydrological receptors - Recommendation for: - Ecological Clerk of Works approval - Securing mitigation through CEMP and planning conditions	- Micrositing is recognised as a key mitigation tool to: - Avoid deeper peat - Reduce excavation volumes - Minimise hydrological and ecological impacts - This will be controlled through: - A planning condition setting out the parameters for micrositing. - Environmental management plans (CEMP), secured via planning condition. - On-site supervision (e.g. Ecological Clerk of Works), secured via planning condition.
Natural England	RBC: 23 rd January 2026	Natural England raises significant concerns regarding potential impacts on deep peat (>0.3 m), peatland hydrology, and long-term peatland function, and considers that further information is	-

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	RMBC: 23 rd January 2026	required before impacts can be determined. Key issues include: Peat and hydrology: • Potential for significant adverse effects on deep peat (>0.3 m) and associated blanket bog habitat. • Concern that impacts extend beyond the footprint into the wider hydrological system. • Insufficient assessment of long-term hydrological modification from infrastructure and drainage. • Recognition that excavation and movement of peat permanently alters hydrological properties. Avoidance and infrastructure siting: • Emphasis on avoidance as the primary mitigation principle. • Concern regarding turbines T13, T14 and T15 and associated tracks within a large relatively intact peat mass. • States that micrositing alone is insufficient and requests further design refinement.	• The adverse effects on deep peat (>0.3m) have been acknowledged, the excavated volumes calculated and assessed through the sensitivity and magnitude of impact criteria which are considered appropriate as they have been tested across numerous moorland sites in Scotland and Wales. The assessment acknowledges that the criteria and associated significance of effect are only valid if all excavated peat can be reused appropriately on site. • There are impacts on the hydrological system beyond the immediate infrastructure footprint, however these are limited in extent due to the low permeability of the peat. • As development within the higher moorland areas can have an impact upon surface runoff in the lower catchment, the drainage strategy has been developed to ensure that there would be no increase in peak flows within any watercourses or channels routing from the site, thus ensuring any future rainfall events would not be made worse by the Proposed Development as presented in Flood Risk Assessment and Drainage Strategy. • As part of this FEI Submission, the layout has been refined further with a reduction in the number of turbines and substantial reduction in the volume of peat that will be excavated. • Turbine T13 has been removed and turbine T15 has been relocated further west to an area absent of peat. Turbine T14 and the access track crosses a heavily eroded area of peat as demonstrated on Figure 14.11: Peatland Condition Assessment in Volume 1 of the FEI Environmental

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			Statement. The construction of the track and hardstanding in this area along with the proposed restoration measures provide an opportunity to arrest the ongoing erosion that is continually reducing the extent of the peat bog. • Infrastructure within eroded peat areas affords the opportunity to stabilise the peat and reduce ongoing erosion and reduction of the peat mass.
		Peat depth and sensitivity: • Defines deep peat as >0.3 m, consistent with recent Natural England guidance. • Notes that infrastructure on peat below 1m can still cause significant hydrological impacts. • Implies that peat sensitivity may be underestimated within the assessment.	• The Applicant accepts that hydrological impacts are possible on site however they can be mitigated through the use of an appropriately designed drainage scheme to replicate the current run off rates from the site, which will be secured via planning condition. • Hydrogeological alteration within peat is considered to be limited in lateral extent due to the low permeability of the peat.
		Peat translocation and restoration: • Raises significant uncertainty regarding: – Feasibility of peat translocation, particularly to Cragg Quarry – Suitability of quarry substrate (granular made ground) for peat hydrology • Recommends consideration of: – Alternative restoration techniques (e.g. peat bunding, rewetting) • Requests clarification on: – Restoration extent (direct vs wider hydrological impacts) – Management control and grazing	• The restoration methods for Cragg Quarry are presented in Appendix 14.3: Outline Peat Management Plan and require low permeability material to be used in order to maintain peat saturation levels in the translocated peat. • Other restoration responses are provided in Chapter 9: Ecology.

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		– Whether restoration includes wider rewetting measures	
		Hydrological assessment gaps: • Considers that baseline hydrology and drainage understanding is incomplete. • Requests: – Further detail on surface water flow, drainage patterns and peat condition. – Evidence to support restoration approach. • Notes that operational and long-term hydrological effects are not fully assessed.	The Drainage Strategy sets out run off calculations in order to size appropriate drainage management structures so that the current hydrological conditions, greenfield runoff rates, can be maintained. A detailed drainage scheme will be secured via planning condition. A Flood Risk Assessment has been completed that identifies the low probability of flooding on site and will enable watercourse crossing structures to be sized appropriately to avoid an significant effect on flows. Peatland condition has been assessed and is presented in Appendix 14.9 Peatland Condition Assessment and demonstrates the modified and eroded nature of the peatland. The peat restoration approach using excavated peat is presented within Appendix 14.3 Outline Peat Management Plan and focuses on the restoration of eroded areas of peatland and the construction of peat cells to connect existing areas of peatland. These are commonly used techniques that have been shown to be successful on other sites.
Greater Manchester Ecology Unit (GMEU)	RBC: 10 th October 2025 RMBC: None received to date	No objection subject to conditions. Acknowledges loss of blanket bog and indirect hydrological impacts but considers mitigation and compensation (restoration plan) could offset impacts if properly implemented. Recommends detailed Peat Management Plan, long-term monitoring, and adaptive restoration approach.	The completion of a detailed Peat Management Plan, long-term monitoring, and adaptive restoration approach is accepted – this will be secured via planning condition.
Environment Agency	RBC: 22nd September 2025	No objection in principle subject to conditions relating to land contamination. Supports hydrological and peat management approach,	Measures to protect groundwater and surface water are outlined in Appendix 14.1: Good Practice Methods , with supporting assessment in Chapter 14 . The Drainage Strategy is

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	RMBC: 22nd September 2025	including Sustainable Drainage (SuDS) and restoration proposals. Requests further detail on drainage, hydrological controls, and mitigation to protect groundwater and surface water quality.	presented as a standalone technical report. Further detailed drainage design along with hydrological controls and mitigation specification will be completed prior to the commencement of development and will be secured through planning condition.
United Utilities (UU)	RBC: 10 th October 2025 RMBC: 10 th October 2025	• Raises concerns regarding risks to water quality within public water supply catchments, particularly due to peat disturbance. • Confirms that several raw water mains, pressurised water mains and public sewers cross the Site and must not be built over, or access compromised. • Requests a detailed drainage plan (for construction & operation) is provided prior to determination of the Applications. • Requests that a management and maintenance regime for the proposed drainage system is secured via planning condition. • Requests further discussion with the Applicant on impacts to watercourses that interact with UU assets. • Requests clarification on water supply requirements for the Proposed Development.	• Assessment of water supplies is provided in: – Appendix 14.6: Private Water Supplies Assessment – Appendix 14.7: Public Water Supplies Assessment • Mitigation is presented in: – Appendix 14.1: Good Practice Methods – Appendix 14.3: Outline Peat Management Plan – Drainage Strategy • A Water Quality Monitoring Plan will be produced in conjunction with United Utilities to detail the water monitoring that will be undertaken to establish baseline water quality for comparison throughout the construction period. A detailed Water Quality Management Plan will be secured via planning condition. • At this stage the Drainage Strategy is in outline, illustrating discharge rates, locations and treatment & attenuation features. A detailed drainage design is proposed to be submitted to and approved by the Local Planning Authority (in consultation with the LLFA and United Utilities) prior to the commencement of development pursuant to a planning condition – this detailed design will include detailed drainage plans. All details of the above are included within the Drainage Strategy, along with notes on the maintenance regimes for any SuDS features. • Any UU assets that the Proposed Development crosses will be identified and during the detailed design stage the drainage infrastructure will be designed to ensure that

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			there is no impact upon them and relevant buffers are maintained.
Lancashire Wildlife Trust	RBC: 3 rd November 2025 RMBC: 28 th October 2025	Objects to the Proposed Development due to significant loss of Annex 1 blanket bog habitat. Considers impacts underestimated and compensation/restoration insufficient. Raises concerns regarding hydrological impacts, turbine siting on deep peat, and robustness of biodiversity net gain assessment.	- The infrastructure layout has been refined using extensive high density peat depth data Appendix 14.2: Peat Survey Report and a number of turbines have been removed to reduce peat excavation. - Management and reuse of excavated peat is set out in the Appendix 14.3: Outline Peat Management Plan. - Hydrological impacts are assessed in the Flood Risk Assessment and Drainage Strategy, respectively and will be designed so that no change in surface flows occurs within each catchment.
National Trust	Letter, 10 October 2025	Objects due to concerns over peat loss. Notes most turbines located on deep peat (>0.3 m) and highlights uncertainty in peat restoration effectiveness and monitoring. Requests clearer evidence that impacts can be mitigated and that restoration delivers net environmental benefit.	- As part of this FEI Submission, the layout has been refined further with a reduction in the number of turbines and substantial reduction in the volume of peat that will be excavated. - Management and reuse of excavated peat is set out in the Appendix 14.3: Outline Peat Management Plan.
Lancashire County Council Flood Risk Management (as Lead Local Flood Authority for Rossendale)	RBC: 24 th September 2025 and 10 th December 2025 RMBC: N/A	Raises an objection on the basis that the submitted Flood Risk Assessment is considered to be inadequate as it fails to demonstrate that the Proposed Development will not result in a flood risk within or outside the Site. Also considers that the submitted Drainage Strategy includes an inadequate surface water sustainable drainage strategy and fails to provide appropriate minimum operation standards for peak flow and volume control.	- The Flood Risk Assessment has been updated with additional text in sections 4.4 and 5.1 to address the comments regarding surface water flood risk. - The Drainage Strategy has been updated to include a sub-catchment plan, and calculations revised to demonstrate that the proposed discharges from the Site will be attenuated to the required rate and to the appropriate location.

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RMBC Highways & Engineering Service (as Lead Local Flood Authority for Rochdale)	RBC: N/A RMBC: 13 th October 2025	- Confirms that the Proposed Development is acceptable in principle subject to the clarifications on attenuation capacity, exceedance flow routing, construction phase drainage proposals, and maintenance & adoption of the proposed drainage features. - Considers that the Drainage Strategy is sufficiently detailed for subsequent design and implementation to be controlled by appropriate planning conditions.	- Section 2.5 of the Drainage Strategy has been updated to include details of how conveyance flow paths are to be maintained, as well as comments relating to the maintenance of the SuDS features. - It should be noted that the Microdrainage attenuation calculations presented in the Drainage Strategy are for sizing of the storage features, and are not detailed design. A detailed drainage design is proposed to be submitted to and approved by the Local Planning Authority (in consultation with the LLFA and United Utilities) prior to the commencement of development pursuant to a planning condition – this detailed design will ensure there is no ‘flood risk’ during the 2 year event.

Chapter 15: Climate Change

RBC Climate Change Programme Officer	RBC: 23 rd September 2025 RMBC: N/A	No Objection: Confirms full and strong support for the Proposed Development, which aligns closely with RBC’s Climate Change Strategy and Action Plan by making a significant contribution to the transition towards clean, renewable energy.	The Applicant thanks RBC Climate Change Programme Officer for their comments and support for the Proposed Development.
Rooley Moor Neighbourhood Forum (RMNF)	RBC & RMBC: 10 th September 2025	Objection: Claims that it inappropriate to use the Scottish Government carbon calculator tool as it is considered to be ill-suited for complex peatland environments, lacking the granularity to account for site-specific peat depth, hydrological variability, and restoration uncertainty - factors that are critical to upland carbon dynamics.	Scottish Government’s NPF4 Planning Guidance: Policy 2 Climate Mitigation and Adaptation of June 2025¹ acknowledges (paragraph 4.7.3) that the carbon calculator tool has been subject to a recent review by ClimateXChange, however it concludes the methodology “...currently remains the best available means by which carbon calculations can be provided in a consistent and comparable format, until such a time as there is an alternative or replacement of the calculator”.

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		Claims that the tools' default assumptions risk underestimating emissions from peat excavation, drainage, and long-term oxidation, especially in areas with deep or degraded peat. This undermines the credibility of the carbon payback analysis and inflates the scheme's perceived climate benefit.	- The Technical Note which accompanies the carbon calculator toolⁱⁱ explains (paragraph 4) that the methodology replaces a relatively simple approach that was required under previous (2003) Scottish Natural Heritage guidance and represents a more comprehensive approach for assessing carbon emissions, carbon savings and carbon payback period. It is clear from a review of this Technical Note that the carbon calculator tool considers a range of interrelated factors regarding peat and hydrology during construction, operation and restoration including: - Changes to carbon dynamics - Loss of carbon fixing potential - Changes in carbon stored - Loss of carbon from removed peat - Loss of carbon from drained peat - Loss of carbon dioxide due to leaching of dissolved and particulate organic carbon - As explained in Chapter 15: Climate Change of the Environmental Statement, Volume 1, examples of consented wind farms outside of Scotland that have applied the SEPA carbon calculator tool include Upper Ogmere Wind Farm, Bridgend, Wales, and Garn Fach Wind Farm, Newtown, Wales. - Site and scheme-specific data (not default assumptions) have been utilised for the large majority of parameters in the carbon calculator tool. The only default value relating

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			to peat condition that has been applied is its carbon content where the tool's default values (49% minimum, 62% maximum) have been used and from which the expected value of 55% has been calculated as the mean between these values.

ⁱ <https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2025/06/npf4-planning-guidance-policy-2-climate-mitigation-adaptation/documents/npf4-planning-guidance-policy-2-climate-mitigation-adaptation/npf4-planning-guidance-policy-2-climate-mitigation-adaptation/govscot%3Adocument/npf4-planning-guidance-policy-2-climate-mitigation-adaptation.pdf>

ⁱⁱ <https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2018/12/carbon-calculator-technical-guidance/documents/calculating-potential-carbon-losses-and-savings-from-wind-farms-on-scottish-peatlands-technical-guidance/calculating-potential-carbon-losses-and-savings-from-wind-farms-on-scottish-peatlands-technical-guidance/govscot%3Adocument/Calculating%2Bpotential%2Bcarbon%2Blosses%2Band%2Bsavings%2Bfrom%2Bwind%2Bfarms%2Bon%2BScottish%2Bpeatlands%2B-%2Btechnical%2Bguidance.pdf>