



Planning, Design & Access Statement

Scout Moor II Further Environmental Information

August 2026



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Our reference
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Executive Summary

Introduction

1. This *Planning, Design and Access Statement* (PDAS) has been prepared by Turley on behalf of Cubico UK Development (Wind 1) Limited ('the Applicant'). It is submitted as part of the provision of Further Environmental Information ('FEI') pursuant to the applications for full planning permission ('the Applications') relating to the construction and operation of a new onshore wind farm (to be known as 'Scout Moor II') together with a comprehensive moorland restoration scheme (hereafter referred to as 'the Proposed Development') on land at Rooley Moor and Scout Moor ('the Site').
2. As the Site crosses the administrative boundary between Rossendale Borough Council ('RBC') and Rochdale Metropolitan Borough Council ('RMBC') the applications have been submitted to both Councils with each being responsible for the consideration and determination of those elements of the Proposed Development within their administrative area.
3. The Applications were originally submitted in July 2025 and were validated in August 2025 (RBC ref. 2025/0267 and RMBC ref. 25/00680/FUL) ('the 2025 Submission'). Following the completion of an extended period of consultation with the Councils, statutory and non-statutory consultees, the public and other interested parties, the Applicant has undertaken a thorough review of the Proposed Development. This design evolution has resulted in revisions to the Proposed Development (and associated application drawings and documents) which are hereby submitted for consideration by the Councils as FEI ('the FEI Submission')¹.
4. This PDAS wholly supersedes the version submitted with the 2025 Submission and presents the Applicant's updated planning case in support of the Proposed Development.
5. A grid connection, of up to 99.9MW, has been secured from SP Electricity North-West (the Distribution Network Operator) to connect the Proposed Development to the local distribution network in 2029. The Proposed Development will have an installed capacity of at least 68.4MW², with the final capacity subject to final turbine procurement selection – it will not exceed 99.9MW so as not to surpass the grid connection limit or the Nationally Significant Infrastructure Project threshold.
6. Planning permission is sought for a temporary period of 40 years after which the wind turbines and associated infrastructure would be decommissioned and the Site restored in accordance with a detailed restoration scheme to be agreed with the Councils.

¹ For ease of referencing, the turbine numbering has been retained, with those turbines removed omitted from the plans, and as such turbine numbering is not sequential.

² Based on 12no. turbines and a candidate turbine with a generation rating of 5.7MW per turbine.

7. The Applications are supported by an *Environmental Statement* and a range of other drawings and technical assessments, as agreed with RBC and RMBC through pre-application engagement.

Strategic Drivers

8. Cubico is a global leader in the renewable energy sector with numerous projects in operation (3.6 GW) and under construction (482 MW), and a project development pipeline of 9+ GW, across nine countries and 225+ assets.
9. Cubico is promoting Scout Moor II in direct response to the Government's amendments to the National Planning Policy Framework (December 2024), subsequent draft amendments (December 2025) and the National Policy Statements EN-1 and EN-3 (January 2026), as well as the Onshore Wind Taskforce Strategy (July 2025), all of which support and encourage the deployment of onshore wind farms in England.
10. The Proposed Development is entirely aligned with and supportive of the UK's statutory obligation, as expressed within the Climate Change Act 2008 to be 'net zero' by 2050 and the aspiration of both Councils to be net-zero by 2030 (RBC) and 2038 (RMBC) respectively. The UK Government has identified the need for increased renewable capacity, including the 'mass deployment' of onshore wind, to meet legally binding climate goals and national security objectives. Targets for onshore wind deployment have been set for 2030 through the Clean Power 2030 Action Plan, with a series of actions identified to stimulate increased deployment through the Onshore Wind Taskforce Strategy and the National Security Strategy 2025 confirming the vital role of domestic energy security in safeguarding the UK against external threats. However, there are only a finite number of viable onshore wind sites that are environmentally acceptable, commercially feasible, and capable of securing a grid connection in time. Scout Moor II is one of those rare projects — it has grid rights in place and is technically and financially deliverable within the Government's 2030 timeframe. To realise this ambition, the planning system must not become a barrier. Timely consent is critical to ensuring projects like this can proceed to construction and help meet national targets. Delay at this stage risks missing the window for delivery, undermining both national and local policy goals.
11. The measures presented within the *Moorland Restoration and Management Plan* are supportive of the objectives set out within the UK Peatland Strategy 2018-2040 and the England Peat Action Plan (2021) whilst the measures presented within the *Outline Habitat Management & Monitoring Plan* are supportive of the objectives for delivery of biodiversity net gain as set out within the Environment Act 2021.
12. This is one of the first, if not the first, applications for a commercial scale wind farm to be submitted in England for more than 10 years.
13. Although it does not comprise a Nationally Significant Infrastructure Project (NSIP) with reference to the Planning Act 2008 it is, nevertheless, of national significance in terms of its scale and the contribution it would make to meeting national objectives relating to net-zero, security of energy supply, socio-economic growth and peatland restoration.

The Proposed Development

14. The Proposed Development comprises, in summary:
- 12 wind turbines with a maximum height to blade tip of up to 180 metres (above ground level) and associated crane pads and hard standing;
 - Underground electrical cabling which would connect the turbines to an onsite substation and thereafter to the local electricity distribution network at the Rossendale Bulk Supply Point;
 - An onsite substation;
 - A network of new access tracks and watercourse crossings together with upgrades to those tracks which currently exist (which are associated with the existing Scout Moor Wind Farm (SMWF)); and
 - A temporary construction compound and laydown area.
15. The design of the Proposed Development has been conceived over a period of 36 months and has followed an iterative process, whereby design has been influenced by the collation of baseline data relating to the condition and constraints of land within the Site; the identification of receptors likely to be affected by the Proposed Development (environmental, human and technical); the process of Environmental Impact Assessment (EIA); and engagement with various stakeholders including the local community and statutory and non-statutory consultees, both prior to the original submission of the Applications and in response to statutory consultation on the 2025 Submission undertaken by the Councils.
16. The design process has, mindful of national government objectives and priorities relating to the generation of renewable energy from onshore wind, the available and secured grid connection capacity at the Rossendale Bulk Supply Point and the available wind resource, sought to optimise the energy generation of the Proposed Development whilst also balancing the need to avoid significantly adverse effects to the environment in so far as reasonably possible and incorporate mitigation where appropriate and necessary. A range of primary mitigation measures are embedded into the design whilst other measures are capable of being secured either by planning condition or legal agreement³.
17. Pre-application consultation was undertaken through information being made available on a project website and through public meetings, exhibitions, webinars and where appropriate 1-2-1 discussions. Pre-application public consultation took place at two key stages in the design process: in November 2024 and March 2025, and the results of this consultation together with details on how Cubico has responded is presented within a *Statement of Community Involvement* which formed part of the 2025 Submission.

³ Pursuant to Section 106 of the Town and Country Planning Act 1990.

18. Over the pre-application period, the Proposed Development was refined from a scheme of up to 24 turbines to a proposal for up to 17 turbines. Following feedback received on the 2025 Submission, the Proposed Development has been further reduced to a scheme comprising up to 12 turbines. Details of how Cubico responded to public feedback on the 2025 Submission are set out in the *You Said, We Heard, We Acted* document which forms part of the FEI Submission, alongside the *Applicants Response to Statutory and Non-Statutory Consultees* document.
19. The FEI Submission represents a betterment in comparison to the 2025 Submission, which is material to the determination of the Applications and is reflected in the assessment presented in later sections of this PDAS. In summary, this includes:
- A reduction of 5no. turbines, resulting in a 17% reduction in total infrastructure.
 - Reduced impact on peatland, including:
 - 51% less infrastructure located on peat over 1m depth.
 - 33% reduction in the average depth of peat beneath permanent hardstanding (average depth reduced from 50cm to 30cm).
 - 28% reduction in peat excavation.
 - Noticeable reduction in the number and density of turbines visible in key views, with less turbines seen in every viewpoint and a reduction in the ‘stacking’ effect of turbines in views.
 - Reduction in noise levels and potential shadow flicker effects.
 - Improved separation distances to residential receptors.
 - Alternative approach to grid connection, removing disruption to Edenfield Village and the local highway network.
 - A 30% reduction in construction traffic and abnormal load movements as a result of the removal of turbines.
 - Reduction in carbon payback period from 1.8 to 1.5 years.
 - Reduction in the scale of impact on the openness of the Green Belt.
20. Key design objectives have included: setting the turbines back from the edges of the moor thereby lessening the visual impact on the settled valleys below; avoiding deeper areas of peat where possible; minimising impacts on residential amenity of nearby properties and providing adequate separation to bridleways, public rights of way, watercourses and areas of former mining; and for vehicular access during construction and operation to utilize Scout Road, the existing Scout Moor Wind Farm access road from the A680.
21. Construction and maintenance of the Proposed Development **will not** require the use of Rooley Moor Road (RMR). A single crossing point of RMR is proposed for

construction and maintenance vehicles. RMR will be subject to a condition survey prior to construction commencing, protected during works and will be reinstated or repaired as necessary following completion of construction.

22. Due to their height the turbines will require aviation lighting to meet military and civil aviation requirements. To minimise the visual impacts, infrared lighting will be installed on all turbines with lighting visible to the naked eye installed on only eight of the twelve turbines.
23. A comprehensive package of moorland and peatland restoration works comprising habitat enhancement and restoration forms an integrated part of the Proposed Development, as does a package of measures to improve access to the moorland for outdoor access and recreation.
24. The *Moorland Restoration and Management Plan* (MRMP) presents proposals for the restoration of severely degraded moorland habitat. The measures include Core / Controlled Restoration whereby 116.7ha (99.77ha in RBC and 16.93ha in RMBC) of degraded peat moorland (which is not subject to Common Land restrictions) would be fenced and subject to a range of physical restoration works such as peat translocation and measures to assist water table recovery such as drain blocking, gully reprofiling and plug planting of Sphagnum species. Measures also include Community Restoration whereby 228ha (115ha in RBC and 113 in RMBC) of less degraded peat moorland will be managed and restored using cutting schedules and stock rotation.
25. Together the Core/Controlled and Community Restoration works comprise tried and tested methods deployed on other projects in the UK. The restoration works will be subject to regular surveys by an experienced environmental clerk of works to assess the effectiveness of the works which have been implemented. The results of such surveys will be submitted as a report to a Habitat Management Group for independent review, including confirmation of the need for remedial works (if necessary) or adaptation of restoration techniques – the final approval of the restoration works will thereafter be granted by the Councils. The implementation, monitoring and management of the moorland restoration works will be secured by Section 106 Agreement.
26. Submitted alongside the MRMP is an *Outline Habitat Management and Monitoring Plan* which, amongst other things proposes the creation of 49.49ha of new acid grassland, 0.67ha of other mixed woodland planting and 2.84km of riparian planting to enable the Proposed Development to achieve a greater than 10% biodiversity net gain. It also sets out proposed habitat enhancements for bats and birds.
27. The *Outdoor Access Management and Enhancement Strategy* details how public access will be protected and managed during construction and operation of the Proposed Development prioritising public safety, minimising disruption and protecting and enhancing the recreational value of Scout Moor and Rooley Moor including through a package of measures targeted at reducing illegal off road vehicle use comprising physical barriers, community education and working in partnership with other agencies such as the Police.

28. As parts of the Site are registered as Common Land it will be necessary for Cubico to make separate applications for Common Land consent (pursuant to the relevant parts of the Commons Act 2006) to deregister relevant land parcels to allow development to take place and to register replacement Common Land.

Scheme Benefits

29. The Proposed Development will deliver a range of substantial benefits which include the following:

- A significant contribution to the UK meeting its statutory obligations relating to net zero and to playing its part in addressing the global climate change challenge, whilst also contributing to higher levels of national energy security.

The Proposed Development would also contribute more locally to Rochdale and Rossendale, Greater Manchester and Lancashire addressing their own declared climate change emergencies, achieving net zero emissions and increasing the supply of renewable energy. It would deliver at least 68.4MW⁴ of renewable electricity, which equates to some 9,131,564 megawatt hours (MWh) of zero carbon electricity over its 40-year lifetime, sufficient to power 84,552 typical UK homes each year.

Once the Proposed Development becomes operational it would deliver 102,326 tCO₂e of GHG emission savings annually through the generation and utilisation of renewable electricity compared to fossil fuel generation (i.e. GHG savings). The payback period (in terms of the emission of greenhouse gases) for the project would be just 1.5 years.

- The restoration of extensive areas of degraded peat moorland to the benefit of carbon sequestration, habitat restoration, landscape quality, water quality and reduced flood risk, which is set out in detail in the *Moorland Restoration and Management Plan*.

The restoration of extensive areas of peat moorland is entirely aligned with UK objectives as set out in 'UK Peatland Strategy 2018-2040'⁵ and the 'England Peat Action Plan'⁶.

The Proposed Development would also deliver a net gain to biodiversity in excess of statutory requirements which is achieved through enhancement to non-irreplaceable habitats and fauna as set out in the *Biodiversity Net Gain Assessment* and *Outline Habitat Management and Monitoring Plan* (HMMP). This biodiversity net gain is in addition to the moorland restoration proposals.

- Enhanced provision for lawful access and recreation within the Site, which includes:

⁴ Based on 12no. turbines and a candidate turbine with a generation rating of 5.7MW per turbine.

⁵ International Union for the Conservation of Nature (IUCN) UK Peatland Programme (2018). Available: [UK Peatland Strategy 2018_2040.pdf](#)

⁶ DEFRA, (2021). Available: [England Peat Action Plan](#)

- Provision of approximately 15.1km of new or upgraded access tracks would be created and following construction will be made available for public use.
 - Provision of a new permissive public footpath and bridleway connections would be created, alongside improved cycling links between Cragg and Lee Quarries; a new public amenity area; new interpretation and learning infrastructure, including directional signage; and improvements to Greenbooth Reservoir Car Park would also be provided, as is detailed within the *Outdoor Access Management & Enhancement Plan*.
 - The Proposed Development could also support the creation of a dedicated Ranger and Apprentice Ranger roles whose responsibilities would include to manage trails, control access (including that which is unlawful) and provide educational opportunities.
- Significant socio-economic benefits would be delivered both locally (within Rochdale and Rossendale) and within a wider-geographical area, including:
 - A total gross value added (GVA) of between £33.7 - £35.6 million across the pre-development, construction and operational phases of the Proposed Development.
 - The generation of between £580,000 - £610,000 of business rates annually for the first five years of operation of the Proposed Development.
 - The creation of between 355 - 375 person years of employment.

Additionally, a Community Wealth Fund would be established which would provide a minimum of either £6,000/MW or 3% of gross project revenue – whichever is greater – per annum to support local community projects with additional amounts payable subject to the energy yield realised by the Proposed Development (minimum of £408,000 per annum). The provision of this fund is not, however, a material consideration in the determination of the Application

There is also a commitment to dedication of volunteering time from Cubico employees and contractors and to the creation of an Employment and Skills Plan which includes the creation of apprenticeship opportunities and educational provision in partnership with local schools and colleges.

Environmental Effects

30. Notwithstanding the iterative and sensitive design process which has been followed and the identification of additional mitigation, which can be secured by planning condition and / or legal agreement, the Applications record that there will be some potential residual harm to some receptors (environmental, human and technical).
31. This potential residual harm comprises:

- Definitional harm to the Green Belt, harm to the openness of the Green Belt and harm to the purposes of safeguarding the Green Belt from encroachment and preserving the setting of historic towns.
 - Harm to landscape character and visual amenity which in some instances would be significant and others not significant. The effect on the special qualities of the Peak District National Park / Forest of Bowland National Landscape would not be significant.
 - A degree of harm to the significance of 17 listed buildings, three Conservation Areas, one Registered Park & Garden and nine non-designated heritage assets which ranges from 'very low' to 'moderate', but in all cases is assessed as being below the bar of 'substantial harm' as set out in the NPPF.
 - Negligible / minor harm to some individual ecological / ornithological receptors and watercourses / waterbodies.
 - The potential for intermittent effects from shadow cast on horses and riders dependent on various factors including prevailing weather conditions and time of day.
32. This potential residual harm, which would be temporary and reversible, has been minimised in so far as is reasonably possible and, for a scheme of this nature, its occurrence is neither unusual nor unexpected.
33. The inevitability of significant residual harm from energy infrastructure (particularly in relation to landscape and visual effects) is recognised in National Policy Statements for Energy Infrastructure⁷, and results from the current international, national and local policy imperatives associated with a shift to a net zero economy and the recognition which is given to the importance of onshore wind as part of the energy mix.

Development Plan Compliance and Other Material Considerations

34. An assessment of the Proposed Development against the provisions of the adopted Development Plan(s) has been undertaken.
35. It is considered that the Proposed Development is in compliance with the objectives and provisions of the Development Plan when considered as a whole.
36. The Proposed Development is also compliant with the provisions and objectives of a wide range of other legislation, policy and strategy relating to net-zero and national energy security including the NPPF, PPG, National Policy Statements EN-1 and EN-3, the UK Peatland Strategy and the England Peat Action Plan which together comprise relevant material considerations.

⁷ Paragraph's 3.1.2, 4.1.7 and 4.2.28 of NPS EN-1 (adopted January 2026).

Overall Planning Balance and Conclusions

37. Planning permission is sought for what would be the first commercial scale onshore wind farm in England for more than a decade. It is a strategically important application both within a national and regional context.
38. The Proposed Development is promoted in direct response to amendments to the NPPF and to National Policy Statements EN-1 and EN-3; to the UK's statutory obligation, as expressed within the Climate Change Act 2008 to be 'net zero' by 2050; and the urgent need for 'mass deployment' of onshore wind, as is identified in the Clean Power 2030 Action Plan. It has secured a 2029 grid connection from the Distribution Network Operator and is available for early deployment, subject to securing planning permission.
39. The construction and operation of the Proposed Development would deliver a range of substantial and enduring environmental, economic and social benefits which directly respond to national policy objectives of the highest order. These benefits attract significant weight.
40. Residual environmental effects have been minimised in so far as is reasonably possible having regard to the national objective relating to the generation of electricity from onshore wind farms, the available and secured grid connection for 2029 and the available wind resource.
41. It is simply inconceivable that the scale of energy generation required to meet net zero objectives can be achieved without the deployment of commercial wind turbines of the scale proposed and in doing so significant effects to landscape character and visual amenity are inevitable and unavoidable.
42. The environmental effects would be temporary and entirely reversible upon decommissioning. They are neither unexpected nor unusual, and not out of the ordinary and preferable to the devastating, long term and irreversible effects of climate change.
43. The Proposed Development is considered to be compliant with the Development Plan when considered as a whole. With the substantial and enduring national benefits which stand to be realized clearly outweighing the temporary, reversible and largely localised effects identified.
44. In consideration of the above, planning permission should be granted without delay.
45. Doing so would send a very strong signal to the international renewable energy development community that the change in planning policies brought into force by the Labour Government in 2024 are having the necessary effect and facilitating the delivery of critical infrastructure. It would demonstrate that the consenting of such projects is possible and potentially catalyse similar developments elsewhere in the UK in line with national objectives.

1. Introduction

- 1.1 This Planning, Design & Access Statement ('PDAS') has been prepared by Turley on behalf of Cubico UK Development (Wind 1) Limited ('the Applicant' or 'Cubico'). It is submitted as part of Further Environmental Information in respect of the cross-boundary applications for full planning permission ('the Applications') relating to the construction and operation of a new onshore wind farm (to be known as 'Scout Moor II'), alongside a comprehensive moorland restoration scheme (the 'Proposed Development'), on land at Rooley Moor ('the Site').
- 1.2 The Site crosses the administrative boundaries of Rossendale Borough Council ('RBC') and Rochdale Metropolitan Borough Council ('RMBC') (collectively referred to as 'the Councils'). The Councils are the Local Planning Authorities ('LPAs') responsible for the determination of the Applications, which were originally submitted on 23 July 2025 and were validated by the Councils on 07 August 2025 (RBC ref. 2025/0267 and RMBC ref. 25/00680/FUL).
- 1.3 Following the completion of an extended period of statutory consultation on the Applications, the Applicant has evolved the Proposed Development to respond to comments received from statutory and non-statutory consultees, the public and other interested stakeholders and is hereby formally amending the Applications through the submission of Further Environmental Information ('FEI'). The FEI, including this PDAS, wholly supersedes the information submitted in July 2025 ('the 2025 Submission') and will be subject to further statutory consultation by the Councils. A summary of the amendments to the Applications is set out in the supporting *Cover Letter* and in Section 6 of this PDAS⁸.
- 1.4 Part of the Site is designated as Common Land. Therefore, in parallel to the Application, Cubico will also make separate applications pursuant to the provisions of the Commons Act 2006⁹, to deregister relevant parts of the Common to facilitate implementation of the Proposed Development and to register replacement Common Land, as well as for any necessary temporary works to be undertaken on the Common.

The Applicant

- 1.5 Headquartered in London, with its UK development team based across Manchester and Glasgow, Cubico Sustainable Investments is a global renewable energy business with a growing footprint in the UK. The company owns and operates more than 18 onshore wind and solar farms across the country, totalling over 250MW of installed capacity. With plans to invest approximately £300 million in new UK projects across a range of clean energy technologies, Cubico is committed to helping deliver reliable, homegrown and affordable energy for British homes and businesses. The company takes a long-term approach to partnerships with stakeholders, working closely with

⁸ For ease of referencing, the turbine numbering has been retained, with those turbines removed omitted from the plans, and as such turbine numbering is not sequential.

⁹ Sections 16 and 38 of the Commons Act 2006

local communities to deliver projects that bring both economic and environmental benefits and create lasting value for the people who live and work near its projects

The Proposed Development

1.6 The description of development is as follows:

“Construction and operation of up to 12 wind turbines with a maximum height to the tip of the blade of 180 metres (above ground level), together with associated ancillary infrastructure comprising crane pads and hardstandings; new access tracks; improvement and widening works to Scout Road; onsite substation; underground electrical infrastructure and cabling; fencing and boundary treatments; external lighting; drainage infrastructure; habitat and moorland restoration works; public right of way works; landscaping; temporary construction compound and staging area; underground electrical grid connection to the Rossendale Bulk Supply Point; and associated engineering works; with micro siting allowance; alongside the retention of and improvements to existing access tracks associated with the existing Scout Moor Wind Farm”

1.7 A detailed description of the Proposed Development is set out in Section 7 of this PDAS, but in summary it comprises:

- 12no. wind turbines with associated crane pads and hard standings, with a maximum height to the tip of the blade of up to 180m above ground level;
- An onsite substation, with woodland planting for screening purposes;
- Underground 33kV electrical cabling infrastructure to connect the proposed turbines to the onsite substation;
- A network of new access tracks and improvements to retained access tracks associated with the existing Scout Moor Wind Farm;
- Improvement and widening works to Scout Road, the existing road providing vehicular access to Scout Moor Quarry and the existing Scout Moor Wind Farm, which will also provide access to Scout Moor II;
- A temporary construction compound and staging area;
- Three underground 132kV electrical cable route options to connect Scout Moor II to the local electricity distribution network at the Rawtenstall Bulk Supply Point (BSP)¹⁰;
- A micro siting allowance for infrastructure components of 50m;
- A comprehensive package of moorland restoration works and biodiversity net gain, comprising habitat enhancement, restoration and creation;

¹⁰ Grid Route Options A, C1 and C2, only one of which would be implemented, which would be controlled via planning condition.

- New fencing and boundary treatments, designed to support moorland restoration and prevent illegal offroad access; and
- A series of measures to improve outdoor access and recreation, including public right of way, footpath and cycle route improvements, directional signage, information boards, new amenity areas and enhancements to Green Booth Reservoir car park.

1.8 The FEI Submission represents a betterment in comparison to the 2025 Submission, which is material to the determination of the Applications and is reflected in the assessment presented in later sections of this PDAS. In summary, this includes:

- A reduction of 5no. turbines, resulting in a 17% reduction in total infrastructure.
- Reduced impact on peatland, including:
 - 51% less infrastructure located on peat over 1m depth.
 - 33% reduction in the average depth of peat beneath permanent hardstanding (average depth reduced from 50cm to 30cm).
 - 28% reduction in peat excavation.
- Noticeable reduction in the number and density of turbines visible in key views, with less turbines seen in every viewpoint and a reduction in the 'stacking' effect of turbines in views.
- Reduction in noise levels and potential shadow flicker effects.
- Improved separation distances to residential receptors.
- Alternative approach to grid connection, removing disruption to Edenfield Village and the local highway network.
- A 30% reduction in construction traffic and abnormal load movements, and an overall reduction in disturbance associated with construction as a result of the removal of turbines.
- Reduction in carbon payback period from 1.8 to 1.5 years.
- Reduction in the scale of impact on the openness of the Green Belt.

1.9 The Proposed Development will deliver a range of substantial benefits, which in summary include:

- The contribution the Proposed Development would make to the UK meeting its statutory obligations relating to net zero and to playing its part in addressing the global climate change challenge, whilst also contributing to higher levels of national energy security mindful of predictions that the national need for

electricity could more than double in the next 25 years in the period to 2050 as a result of factors such as increased electrification of transportation and heating¹¹.

The Proposed Development would also contribute more locally to Rochdale and Rossendale, Greater Manchester and Lancashire addressing their own declared climate change emergencies, achieving net zero emissions and increasing the supply of renewable energy. It would deliver at least 68.4MW¹² of renewable electricity, which equates to some 9,131,564 megawatt hours (MWh) of zero carbon electricity over its 40-year lifetime, sufficient to power 84,552 typical UK homes each year.

Once the Proposed Development becomes operational it would deliver 102,326 tCO₂e of GHG emission savings annually through the generation and utilisation of renewable electricity compared to fossil fuel generation (i.e. GHG savings). The payback period (in terms of the emission of greenhouse gases) for the project would be just 1.5 years.

- The restoration of 116.7 hectares (ha) of degraded peat moorland (99.77ha in RBC and 16.93ha in RMBC) to the benefit of carbon sequestration, habitat restoration, landscape quality, water quality and reduced flood risk, which is set out in detail in the *Moorland Restoration and Management Plan* ('MRMP') and *Outline Peat Management Plan* ('OPMP') submitted with the Application. In addition, 228ha (115ha in RBC and 113ha in RMBC) of moorland which is designated as Common Land will be managed through cutting schedules and stock rotation as needed to benefit the less degraded peatland areas, without impacting on the rights of the Common. The restoration of extensive areas of peat moorland is entirely aligned with UK objectives as set out in 'UK Peatland Strategy 2018-2040'¹³ and the 'England Peat Action Plan'¹⁴.
- The Proposed Development would also deliver a level of net gain to biodiversity which is in excess of statutory requirements (10.81% for area-based habitats and 10.62% for watercourse-based habitats), achieved through enhancement to non-irreplaceable habitats and fauna as set out in the *Biodiversity Net Gain Assessment* and *Outline Habitat Management and Monitoring Plan* ('OHMMP') submitted with the Applications. This includes 49.49ha of acid grassland creation and 0.67ha of other mixed woodland (all in Rossendale), alongside 2.84km of riparian planting (the location of which is to be confirmed via a Biodiversity Gain Plan pursuant to a planning condition). This biodiversity net gain is in addition to the moorland restoration proposals above.
- Enhanced provision for lawful access and recreation within the Site. Approximately 15.1km of new or upgraded access tracks would be created and following construction will be made available for public use. In addition, a new permissive public footpath / bridleway connection would be created, alongside improved cycling links between Cragg and Lee Quarries; a new public amenity

¹¹ National Policy Statement for Renewable Energy (EN-3), paragraph 1.1.2. (DESNZ, adopted January 2026)

¹² Based on 12no. turbines and a candidate turbine with a generation rating of 5.7MW per turbine.

¹³ International Union for the Conservation of Nature (IUCN) UK Peatland Programme (2018). Available: [UK Peatland Strategy 2018_2040.pdf](#)

¹⁴ DEFRA, (2021). Available: [England Peat Action Plan](#)

area; and new interpretation and learning infrastructure, including directional signage, as is detailed within the *Outdoor Access Management & Enhancement Plan*. In addition, the Proposed Development would support the creation of a dedicated Ranger and Apprentice Ranger roles whose responsibilities would include the management of trails, control of access (including that which is unlawful) and providing educational opportunities.

- Significant socio-economic benefits would be delivered both locally (within Rochdale and Rossendale) and within a wider-geographical area, including:
 - During the construction phase it is estimated that between 120-130 net additional FTE jobs will be generated across the UK, including 35-40 within Rochdale and Rossendale. Cubico is committed to ensuring that as many of these jobs as possible are accessible to local people with further details set out in the *Community Benefits Charter* presented as part of the Application.
 - The construction phase is also anticipated to generate between £18.9-£20.0 million GVA boost to the UK economy, including between £17.9-18.9 million in the North West, of which £14.8-15.6 million will be concentrated within Rochdale and Rossendale.
 - The operational phase is anticipated to generate between £12.7-13.4 million GVA boost to the UK economy, including between £10.8-11.4 million in the North West, of which between £9.7-10.3 million will be concentrated within Rochdale and Rossendale.
 - The operational phase is also expected to generate between £580,000 - £610,000 in business rates per year, contributing towards the funding of public services and infrastructure in Rochdale, Rossendale and beyond.
 - Additionally, a Community Wealth Fund would be established which would provide a minimum of either £6,000/MW or 3% of gross project revenue – whichever is greater – per annum to support local community projects with additional amounts payable subject to the energy yield realised by the Proposed Development (minimum of £408,000 per annum). The provision of this fund is not, however, a material consideration in the determination of the Application.

1.10 The Proposed Development has been designed to strike an appropriate balance between the need to optimise electricity generation from the Site (mindful of the national and local policy imperatives relating to climate change and national energy security, an available and secured means of connection to the electricity network and the available wind resource) and the need to follow the mitigation hierarchy, whereby significant adverse effects to the environment are avoided wherever possible by adapting the design through an iterative process and, where avoidance has not been possible, adopting appropriate and proportionate secondary mitigation.

1.11 Notwithstanding the sensitive and iterative design process which has been adopted by Cubico, the *Environmental Statement* records that there is the potential for some

residual harm to some receptors (environmental and human). This potential residual harm has been minimised in so far as is reasonably possible and, for a scheme of this nature, its occurrence is neither unusual nor unexpected.

- 1.12 The inevitability of residual harm from energy infrastructure (particularly in relation to landscape and visual effects) is recognised in National Policy Statements for Energy Infrastructure¹⁵, and results from the current international, national and local policy imperatives associated with a shift to a net zero economy and the recognition which is given to the importance of onshore wind as part of the energy mix.
- 1.13 The limited harm would be temporary and entirely reversible upon decommissioning. It is Cubico's case that the residual harm is infinitely preferable to the catastrophic effects which climate change would have on the environment, landscape and biodiversity if the current level of greenhouse gas emissions is not abated through decarbonisation and the delivery of renewable energy projects such as the Proposed Development.
- 1.14 The identified harm is clearly and demonstrably outweighed by the range of benefits outlined above and expanded upon within this PDAS.
- 1.15 The Proposed Development is in accordance with the Development Plan when considered as a whole and is further supported by an extensive range of legislation, policy and guidance which seek to facilitate the achievement of objectives relating to net zero, national energy security, biodiversity net-gain, economic growth and health and wellbeing and to which significant weight can be attached. These documents include National Policy Statements EN-1 and EN-3.
- 1.16 Although the Proposed Development is not a Nationally Significant Infrastructure Project (as defined by the Planning Act 2008) it is, nevertheless, of national significance in terms of its scale and the contribution it would make to meeting the aforementioned objectives and it would comprise the delivery of critical national infrastructure.
- 1.17 The Proposed Development is also nationally significant by virtue of being one of the first (if not the first) major onshore wind application to be submitted in England following the UK Governments removal of the 'de-facto ban'. The granting of planning permission would send a very strong signal to the international renewable energy development community that the change in planning policies brought into force by the Labour Government in 2024 are having an effect and facilitating the delivery of critical national infrastructure. It would send a message that the delivery of such projects is possible and potentially catalyse similar developments elsewhere in the UK in line with national objectives.

Application Documentation

- 1.18 The Application is accompanied by a full suite of detailed drawings and technical supporting documents (including a full Environmental Impact Assessment, presented in the *Environment Statement*), as listed within the supporting *FEI Cover Letter*. These

¹⁵ Paragraph's 3.1.2, 4.1.7 and 4.2.28 of the Overarching National Policy Statement for Energy (EN-1) (adopted January 2026)

documents should be reviewed alongside this PDAS. The Application comprises all necessary information as required by NPPF Policy DM2 and its supporting Annex C.

This PDAS

- 1.19 As set out above, this PDAS wholly supersedes the version submitted with the 2025 Submission and presents the Applicants updated planning case in support of the Proposed Development.
- 1.20 This PDAS is intended to assist the Councils in determining the Applications by providing an evaluation of the Proposed Development against relevant planning considerations. Having regard to Section 38(6) of the Planning and Compulsory Purchase Act 2004, and in accordance with Policy DM1(1)(b) of the National Planning Policy Framework (NPPF) (August 2026), this PDAS considers the conformity of the Proposed Development with the Local Development Plan(s) and the weight to be applied to other material planning considerations, including the national decision-making policies set out in the NPPF.
- 1.21 This PDAS has also been prepared in accordance with the requirements of Article 9, Part 3 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 and **Table 1.1** provides an overview of how the statutory requirements within Paragraph (3) of Article 9 are addressed. It has also been prepared with regard to the National Planning Policy Framework (August 2026) and associated planning practice guidance¹⁶. It illustrates the processes which have resulted in the Proposed Development and seeks to justify the proposals in relation to their physical and planning context in a transparent, legible and structured method.

Table 1.1: Compliance with Development Management Procedure (Paragraph 3, Article 9, Part 3) relating to Design & Access Statements

A design & access statement must...	Where this is provided within the Application?
(a) explain the design principles and concepts that have been applied to the development.	Refer to Section 06 (Design Approach) of this PDAS.
(b) demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account.	Refer to Sections 03 (Site and Surroundings), 06 (Design Approach) and 07 (Proposed Development) of this PDAS.
(c) explain the policy adopted as to access, and how policies relating to access in relevant local development documents have been taken into account.	Refer to Sections 06 (Design Approach) and 13 (Design, Environment and Amenity) of this PDAS, as well as the <i>Transport Assessment</i> and the <i>Outdoor Access Management & Enhancement Plan</i> .

¹⁶ Paragraphs 029-032, Making an application planning practice guidance (DLUHC, May 2025). Available: [Making an application - GOV.UK](https://www.gov.uk/guidance/making-an-application)

(d) state what, if any, consultation has been undertaken on issues relating to access to the development and what account has been taken of the outcome of any such consultation.	Refer to Section 05 (Pre-App Consultation) of this PDAS, as well as the <i>Statement of Community Involvement</i> .
(e) explain how any specific issues which might affect access to the development have been addressed.	Refer to Section 13 (Design, Environment and Amenity) of this PDAS, as well as the <i>Transport Assessment</i> and the <i>Outdoor Access Management & Enhancement Plan</i> .

1.22 The remainder of this PDAS is structured as follows:

- **Section 2** – highlights the need for the Proposed Development, specifically the climate change crisis, the importance of renewable energy generation (including onshore wind) and the need for peat and moorland restoration.
- **Section 3** – provides an overview of the Site and its geographical context. It also explains the site selection process.
- **Section 4** – provides an overview of the relevant planning history of the Site and its immediate surroundings.
- **Section 5** – summarises the pre-application engagement with the LPAs and Statutory Consultees, along with public consultation. It also summarises the feedback received during the statutory consultation on the Applications (undertaken by the Council) and how the Applicant has responded to this.
- **Section 6** – provides an overview of the approach taken in the design of the Proposed Development, as well as the iteration of the design and layout prior to the 2025 Submission and to inform this FEI Submission.
- **Section 7** – presents details of the Proposed Development for which full planning permission is sought.
- **Section 8** – sets out the framework for decision making and the key issues upon which the Applications should be considered.
- **Section 9** – provides a summary of the adopted Development Plan(s) and other material considerations relevant to the appraisal of the Proposed Development.
- **Section 10** – considers the contribution the Proposed Development will make to national energy security and actions to tackle climate change.
- **Section 11** – appraises the Proposed Development against the strategic planning policies relating to Wind Energy included within the Development Plans.
- **Section 12** – considers the socio-economic benefits of the Proposed Development.

- **Section 13** – appraises the Proposed Development against the planning policies relating to the natural and built environment and amenity.
- **Section 14** – provides an assessment of the extent and level of harm that the Proposed Development would cause to the Green Belt. Then, it provides a comprehensive evaluation of the harm to the Green Belt and other impacts resulting from the Proposed Development alongside setting out the Very Special Circumstances.
- **Section 15** – provides the overall Planning Balance: why the identified need for and benefits of the Proposed Development substantially outweigh any harms arising. It also provides an overall concluding chapter and sets the case for planning permission.
- **Appendix 1** – comprises a schedule of key policies relevant to the determination of the Applications, in support of Section 9.
- **Appendix 2** – comprises a plan showing the Local Authority boundary and the proposed Infrastructure Layout.
- **Appendix 3** – comprises a plan showing the Green Belt boundary and the proposed Infrastructure Layout.
- **Appendix 4** – comprises a summary of the published Green Belt Assessments for the area within which the Site is located.

2. Need for the Proposed Development

- 2.1 This section of the PDAS sets out the strategic context to the Proposed Development, including the climate change crisis, the importance of renewable energy generation (including onshore wind) and the need for peat and moorland restoration.

The Climate Emergency Crisis

- 2.2 Climate change refers to the long-term changes in the Earth's climate characterised by shifts in average weather patterns. While natural factors contribute to climate change, the term is now predominantly associated with alterations propelled by human activities, particularly the emission of greenhouse gases (GHG) into the atmosphere. These 'anthropogenic' contributions include activities like burning fossil fuels (e.g. coal, oil, and natural gas), deforestation, and industrial processes. These activities release substantial quantities of CO₂ and other GHG's, such as methane (CH₄) and nitrous oxide (NO₂) into the atmosphere. GHG's trap heat, leading to an elevation in the Earth's surface temperature – an occurrence known as the greenhouse effect. Climate change has led to a drastic increase in flood risk, drought, heat waves and other extreme weather events.

- 2.3 The Paris Agreement was adopted at the UN Climate Change Conference (COP21) in 2015. It is a legally binding international treaty on climate change, and its goal is to hold:

"the increase in the global average temperature to well below 2°C above pre-industrial levels" and to pursue efforts "to limit the temperature increase to 1.5°C above pre-industrial levels".

- 2.4 In May 2019, the UK parliament declared an environmental and climate emergency. Whilst there is no fixed definition of a 'climate emergency', the focus is on the need for urgent action to reduce or halt climate change, to prevent further environmental damage. 'Climate change mitigation' relates to the critical need to rapidly reduce GHG emissions to limit future impacts from climate change that are predicted to occur.

- 2.5 The UK Government reinforced the need to tackle the climate crisis at COP29 when, on 12 November 2024, Prime Minister Keir Starmer remarked that the:

"Government recognises that the world stands at a critical juncture in the climate crisis. And the United Kingdom not only has a critical role to play but also, an opportunity to grasp the chance to maximise opportunities for Britain and make us more secure in the here and now"¹⁷.

- 2.6 Efforts to address climate change include "net zero", which refers to the balance between the amount of GHG emitted into the atmosphere and the amount removed or offset. Achieving net zero means that the total GHG emissions produced are equal to the total emissions removed or offset, resulting in no net increase in the concentration

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[PM remarks at COP29: 12 November 2024 - GOV.UK](#)

of GHG in the atmosphere. In the context of climate change, the concept of net zero is crucial for mitigating the impact of human activities on the climate system.

- 2.7 The UK has committed to achieving Net Zero GHG emissions by the year 2050. This target was set through the UK's Climate Change Act, which was amended in 2019¹⁸ to establish the net-zero goal. The commitment means that the UK aims to reduce its GHG emissions to as close to zero as possible and offset any remaining emissions. The pathway to net zero includes an interim target of a 78% reduction in greenhouse gas emissions (compared to 1990 levels) by 2035.
- 2.8 Within the regional context, Lancashire County Council ('LCC') Environment and Climate Strategy 2023-2025¹⁹ emphasises that LCC has placed protecting our environment as one of the top priorities. It focuses on three objectives which are to reduce waste and pollution, tackle climate change (including to reduce greenhouse gas emissions) and protect the natural and historic environment. Greater Manchester Combined Authority ('GMCA') has published a Five-Year Environment Plan 2025-2030²⁰, which confirms one of the identified actions is to increase the capacity of large-scale renewable energy generation and storage (including Solar Photovoltaic and onshore wind). The target for 2030 is to add 375MW renewable energy generation, equivalent to 103KtCO₂ of associated carbon savings based on a pathway up to 2038.
- 2.9 The Site is located within the boroughs of Rossendale and Rochdale. Both Councils have declared a 'Climate Emergency' – Rochdale in July 2019 and Rossendale in September 2019.
- 2.10 RBC has pledged to work towards ensuring that the Council and the Borough is carbon neutral by 2030, in line with the approach adopted by Lancashire County Council in December 2020²¹. Rossendale's Climate Change Strategy²² places an emphasis on 'actively' moving to more renewable sources of energy generation and acknowledges that a key contribution to helping climate change is through:
- "Both a reduction in the overall consumption of energy and the adoption of more renewable energy sources to fulfil our local demand".*
- 2.11 RMBC has pledged to work towards ensuring that the Council and the Borough is carbon neutral by 2038.
- 2.12 Rochdale's Climate Change Strategy and Delivery Plan²³ confirms that one of the key features of a carbon neutral Borough will be for energy to be *"generated locally and to meet local demand"*. This Strategy also identifies a target to increase the renewable energy generated in the Borough from 15GWh to 141GWh by 2030, and to create 1,838 new jobs in low carbon and renewable energy sectors in the Borough by 2038 and 2,643 by 2050.

¹⁸ [The Climate Change Act 2008 \(2050 Target Amendment\) Order 2019 \(legislation.gov.uk\)](#)

¹⁹ [Lancashire County Council Environment and Climate Strategy 2023-2025](#)

²⁰ [Greater Manchester Five-Year Environment Plan 2025-2030](#)

²¹ [Tackling climate change in Lancashire - Lancashire County Council](#)

²² [Rossendale Borough Council - Climate Change Strategy 2020 - 2030](#)

²³ [Rochdale Borough Council - Climate Change Strategy and Delivery Plan](#)

Energy Context

2.13 The following section provides a summary of the UK Government's key energy policies and strategies, as well as those at the regional/local level, specifically in respect of onshore wind.

2.14 The Right Honourable Ed Miliband MP, Secretary of State for Energy Security and Net Zero, set out his priorities for the Department of Energy Security and Net Zero (DESNZ) on 08 July 2024 following the election of the UK Labour Government on 05 July 2024²⁴. To achieve the Prime Ministers' national mission of making Britain a clean energy superpower, with zero carbon electricity by 2030, Mr Miliband's priorities for DESNZ include:

- *"delivering our mission to boost energy independence and cutting bills through clean power by 2030;*
- *taking back control of our energy with Great British Energy; ...*
- *leading on international climate action, based on our domestic achievements".*

Policy Statement on onshore wind

2.15 On 08 July 2024, the UK Government published their Policy Statement on onshore wind²⁵, which set out a commitment to double onshore wind by 2030 and, most importantly, set out the basis for the removal of the 'de-facto ban' on onshore wind in England, in place since 2015, by removing footnotes 57 and 58 to paragraph 168 of the National Planning Policy Framework (NPPF) (December 2023). This change was then carried through into the updated NPPF, published in December 2024 and August 2026.

Onshore Wind Taskforce Strategy 2025

2.16 On 04 July 2025, DESNZ published the Onshore Wind Taskforce Strategy²⁶, which confirms that *"onshore wind is a mature, efficient, and cheap electricity generation technology, and will play a crucial role in delivering our decarbonisation and economic goals"* (page 10). The Strategy sets out a series of urgent actions the UK Government intends to take to unlock onshore wind deployment and deliver the capacity needed by 2030 (as established by CP30), which includes 2GW of onshore wind in England.

2.17 The Strategy goes on to confirm that *"scaling up home-grown renewables, like we're doing for onshore wind, reduces the UK's exposure to volatile global fossil fuel prices, which protects consumer energy bills against future price shocks"* (page 10).

Plan for Change: Milestones for mission-led government

2.18 The Government published within its Plan for Change²⁷, a set of ambitions and milestones it aims to reach by the end of the current Parliament. The Plan is predicated

²⁴ [Energy Secretary Ed Miliband sets out his priorities for the department - GOV.UK](#)

²⁵ [Policy statement on onshore wind - GOV.UK](#) (HM Government, July 2024)

²⁶ Onshore Wind Taskforce Strategy (DESNZ, 04 July 2025). Available: [DESNZ Onshore Wind Taskforce Strategy - July 2025](#)

²⁷ [Plan for Change: Milestones for a mission-led government](#) (HM Government, December 2024)

on the delivery of a set of ‘missions’, which includes seeking to “make Britain a Clean Energy Superpower”.

- 2.19 It is recognised by the government that the UK is home to abundant natural resources for renewable energy, and a pioneering industry delivering the latest advancements in clean technology. The intention is to harness these opportunities to deliver change and the opportunity for growth and good jobs in clean technology.
- 2.20 The government aims to deliver clean power by 2030 and accelerate to net zero. Their mission is to bring energy security, protect billpayers, create good jobs and help to protect future generations from the cost of climate breakdown. This in turn, will help to revive the strength of British manufacturing, bringing jobs and investment into Britain’s industrial heartlands- unleashing the power of British technological innovation, and subsequently bringing private investment and good jobs into all parts of the UK.
- 2.21 The Government’s milestone this Parliament is to secure the country’s energy supply with home-grown, clean power. Key commitments include:
- **Accelerate low carbon power deployment:** Maximise the deployment of renewables and other forms of low carbon electricity generation, to deliver energy security, reduce emissions, drive growth and protect billpayers.
 - **Move to a low carbon economy:** Support sectors across the economy to reduce greenhouse gas emissions, working with the industry and unions to capitalise on the significant job and local growth opportunities.
- 2.22 This milestone will be achieved by:
- **Ensuring the economic benefits of clean energy and net zero are felt by workers and billpayers across the country-** the clean energy transition is one of the key economic opportunities of the twenty first century, protecting consumers from future price shocks, creating new and innovative businesses, and bringing good jobs to workers. Alongside the delivery of clean power, the government have also committed to investing in British homes and workplaces to reduce bills, in particular for lower-income households to reduce fuel poverty (the Warm Homes Plan);
 - **Work in partnership with businesses and the sector, to provide long term certainty, with catalytic public investment-** to attract inward investment through Great British Energy and the National Wealth Fund, and by removing barriers in the planning process and grid, to help enable clean power by 2030;
 - **Power up infrastructure across the country-** the government have lifted the ban on onshore wind, and have committed to reforming and speeding up the planning system to deliver the investment needed for clean power;
 - **Harness cutting-edge technology** – It is recognised that the UK is home to world-leading green-tech companies and researchers, pioneering the way to a clean

future. There is an industry target for at least 50% of the supply chain to be UK based, and significant opportunities to export UK technology abroad.

- **Ensure the public enjoy the full benefits of home-grown clean power** – by helping everyone to benefit from clean power, the intention is to deliver jobs, growth, energy security and tackle the climate crisis.

Clean Power 2030: Advice on achieving clean power for Great Britain by 2030 (2024)

- 2.23 The Clean Power 2030 report published in November 2024²⁸ was prepared by the National Energy System Operator (NESO) – an independent body set up by DESNZ to advise on strategy for achieving clean power ambitions by 2030.
- 2.24 The report confirms that UK power sector emissions have fallen by more than 65% since 2010²⁹ and that clean electricity sources provided for 62% of demand in 2023, primarily from renewables and nuclear. September 2024 saw Great Britain, and more widely the UK, become the first G7 country to phase-out coal power.
- 2.25 NESO’s vision for a clean power system for Great Britain in 2030 envisages that domestic demand is exceeded by energy generated by clean sources, mainly renewables.
- 2.26 The Clean Power 2030 report confirms that onshore wind, alongside solar, is one of the cheapest clear power options available. NESO anticipates a doubling of onshore wind capacity from 13.7GW in 2023 to 27.3GW by 2030 (in both of NESO’s scenarios), recognising that the lifting of planning restrictions in July 2024 provides scope for growth of this technology in England specifically.

Clean Power 2030 Action Plan: A new era of clean electricity (2024)

- 2.27 The Clean Power 2030 Action Plan³⁰ (December 2024), informed by the abovementioned NESO report, set out the UK Governments commitment to delivering clean power by 2030 by tackling three identified challenges:
- To maintain a secure and affordable energy supply
 - To create new industries and investments around the county
 - To protect the environment we live in from the damaging effects of climate change.
- 2.28 The Action Plan outlines the steps towards achieving a clean power system, detailing government actions to support and accelerate the delivery of necessary infrastructure, and how the government will collaborate with all stakeholders to reach this goal.
- 2.29 The Action Plan confirms that “*there is no path to clean power without mass deployment of offshore wind, together with onshore wind and solar*” (Page 07, emphasis added). It identifies onshore wind as one of the “*key supply-side*

²⁸ [Clean Power 2030: Advice on achieving clean power for Great Britain by 2030](#) (NESO, November 2024)

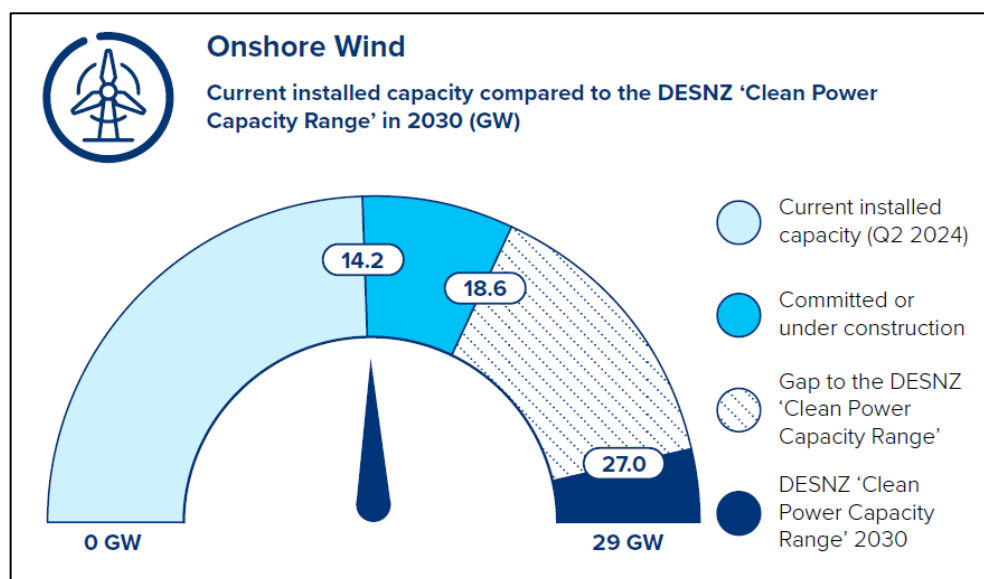
²⁹ [Final UK greenhouse gas emissions national statistics: 1990 to 2022](#) (DESNZ, June 2024)

³⁰ [Clean Power 2030: Action Plan: A new era of clean electricity](#) (DESNZ, December 2024)

technologies” which the UK will “need to deploy more on average each year to 2030 than ... ever done in a single year before” (Page 09).

- 2.30 The Action Plan pathways see a doubling on onshore wind capacity from 14.2 GW in 2023 to between 27 – 29 GW by 2030, which means massively scaling up annual delivery. Accounting for schemes already committed or under construction (4.4GW), current potential onshore wind capacity equates to 18.6GW and therefore there remains a need for 8.4GW of capacity to meet the 27GW target and 10.4GW to meet the 29GW target³¹ (Figure 2.1).

Figure 2.1: Clean Power 2030 Action Plan – Onshore Wind Current Installed Capacity and 2030 Clean Power Capacity Range



- 2.31 The Action Plan draws upon research from Trowers and Hamlins³² and notes that: “onshore wind with a capacity of 27 GW would require around 3,000 km² of land, representing 1% of the total Great Britain land area. Approximately 99% of this land area would remain available for other uses between the turbines, allowing for shared land use, such as agriculture and pasture. Only a small portion, approximately 30 km², would be occupied by the turbines” (Page 71).

UK Infrastructure: A 10 Year Strategy

- 2.32 In June 2025, the UK Government published its 10 Year Infrastructure Strategy³³, which establishes the approach to delivering the infrastructure the Country needs to achieve the objectives set out in the Plan for Change. Chapter 4 focuses on the priorities for “becoming a clean energy superpower” and delivering a clean power system by 2030. In summary it confirms:

³¹ Page 73, [Clean Power 2030: Action Plan: A new era of clean electricity](#) (DESNZ, December 2024)

³² [How can landowners harness onshore wind power opportunities | Trowers & Hamlins law firm](#)

³³ UK Infrastructure: A 10 Year Strategy (HM Treasury and National Infrastructure & Service Transformation Authority, June 2025). Available: [CP 1344 – UK Infrastructure: A 10 Year Strategy](#)

- In line with the Clean Power 2030 Action Plan, 27-29GW of onshore wind generation will be needed by 2030 (paragraph 4.6).
- *“Great Britain will need to continue investing in generation and network infrastructure to support the electrification of other sectors”* (paragraph 4.13)

UK Modern Industrial Strategy & Clean Energy Industries Sector Plan

- 2.33 On 23 June 2025, the UK Government published the UK’s Modern Industrial Strategy³⁴, which sets out the approach to backing the UK’s strengths and ambitious plans for 8no. high-growth sectors. This includes the ‘Clean Energy Industries’ sector.
- 2.34 The Clean Energy Industries Sector Plan³⁵, which supports the Modern Industrial Strategy, sets out a vision for 2035 for the UK to *“be a global leader in Clean Energy Industries, creating hundreds of thousands of good jobs at good wages across the country”*. Amongst a raft of announcements focused on creating Britain as a clean energy superpower and delivering a clean power system by 2030, the Sector Plan sets out following in respect of onshore wind:
- *“Where Britain has strengths, the Government will double down on them. We will: ... Unleash the pent-up power of onshore wind, maintaining momentum after the Government lifted the ban on this growing technology”* (page 8).
 - *“The onshore wind supply chain sector is comparatively underdeveloped in the UK compared to offshore wind – this is a missed opportunity. The onshore wind sector directly supported 6,600 full-time equivalent (FTE) jobs, supported a further 13,100 FTE indirectly, and generated £191 million in exports, in 2022. The Government estimates that the onshore wind sector could support up to 45,000 direct and indirect jobs in Great Britain by 2030”* (page 47).
 - *“Installed capacity is planned to almost double by 2030. Given the future growth in [the onshore wind] sector, there is significant economic opportunity for the UK, particularly in areas of existing strengths: development, balance of plant and operations in the onshore wind sector”* (page 47).

National Security Strategy 2025

- 2.35 On 24 June 2025, the UK Government published the National Security Strategy 2025³⁶ (NSS 2025), which identifies the main challenges the UK will face as a nation in an era of radical uncertainty and sets out a new Strategic Framework in response, which includes as one of the three core pillars ‘security at home’. Under this pillar, the Government sets out the need to build resilience to future threats, including reducing our reliance on other nations, ensuring (amongst other things) our energy security can be maintained even in times of crisis.

³⁴ The UK’s Modern Industrial Strategy (CP 1337) (UK Government, 23 June 2025). Available: [The UK's Modern Industrial Strategy](#)

³⁵ Clean Energy Industries Sector Plan (UK Government, 23 June 2025). Available: [Industrial Strategy: Clean Energy Industries Sector Plan](#)

³⁶ National Security Strategy 2025 (CP 1338) (UK Government, 24 June 2025). Available: [National Security Strategy 2025](#)

- 2.36 The Prime Ministers Foreword to the NSS 2025 states:

“I have long argued that issues like energy security are vital for our national security”.

- 2.37 Paragraph 25 of the NSS 2025 states:

“Our energy security is vital to our national security, economic stability, the delivery of essential services and our ability to fuel new technological developments in fields such as AI. We are moving away from imported fossil fuels and towards electricity produced at home and by our allies. We have banned the import of oil or gas from Russia and are building a global uranium nuclear supply chain that is entirely free from Russian influence. We have also lifted the ban on onshore wind, consented to record amounts of solar power projects and continue to innovate and invest in other sources of renewable energy. Reducing energy prices remains a vital part of ensuring our nation’s ability to innovate and grow our economy”.

Energy Independence Bill

- 2.38 The Kings Speech on 13 May 2026 outlined the Governments’ priorities for energy security and independence, which align with wider national security objectives:

“My Ministers believe that energy independence must be a long-term goal of national security and that the nation’s energy security requires long-term investment and reform, as demonstrated by recent events in the Middle East. Increased production of clean British energy will help to ensure that enemies of the United Kingdom cannot attack the economic security of the British people. My Ministers will therefore introduce an Energy Independence Bill to scale-up homegrown renewable energy and protect living standards for the long-term”³⁷.

- 2.39 The ‘Energy Independence Bill’ aims to provide Government with the powers it needs to go further and faster to deliver clean energy: *“As we face the second fossil fuel shock in half a decade, the lesson for the UK is clear: we need to get off the fossil fuel rollercoaster with clean, homegrown power we control and the electrification of our wider economy”³⁸*. One of the key objectives of the Bill is to accelerate the UK’s drive for energy security by support the deployment of clean power technologies.

National Policy Statements for Energy Infrastructure

- 2.40 The National Policy Statements (“NPSs”) for energy infrastructure set out the government’s policy for the delivery of Nationally Significant Infrastructure Projects (“NSIPs”) and other infrastructure development in the field of energy, providing the predominant planning policy framework for planning decisions in respect of such development. The latest NPSs came into force on 06 January 2026, including the Overarching National Policy Statement for Energy (EN-1) and the NPS for Renewable Energy Infrastructure (EN-3) – these are considered further in Section 8 of the PDAS. Whilst the Proposed Development is not an NSIP, the NPS’s are important material considerations for the Application as they are an up-to-date expression of government policy on energy infrastructure.

³⁷ His Majesty’s most gracious speech to both Houses of Parliament, 13 May 2026. Available: [The King's Speech 2026 - GOV.UK](#)

³⁸ The Kings Speech 2026 – Background Briefing Note. Available: [FINAL Lobby Pack 2026 .docx\[92\]](#)

- 2.41 NPS EN-1 (paragraph 1.1.1) confirms that there is an:
“urgent need for significant amounts of large-scale energy infrastructure in meeting government’s energy objectives”.
- 2.42 Paragraph 3.2.1 sets out that:
“the government’s objectives for the energy system are to decarbonise power generation to meet the Clean Power 2030 Mission, ensuring our supply of energy always remains secure, reliable, affordable, and consistent with net zero emissions in 2050”.
- 2.43 Paragraph 3.3.1 confirms that:
“electricity meets a significant proportion of our overall energy needs and our reliance on it will increase as we transition our energy system to deliver our Clean Power 2030 Mission and net zero targets. We need to ensure that there is sufficient electricity to always meet demand; with a margin to accommodate unexpectedly high demand and to mitigate risks such as unexpected plant closures and extreme weather events”.
- 2.44 Paragraph 3.3.3 goes on to confirm that:
“to ensure that there is sufficient electricity to meet demand, new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand”.
- 2.45 The role of wind power is considered at paragraphs 3.3.23 – 3.3.24, recognising the thresholds set out in the Clean Power 2030 Action Plan and that wind is one of the lowest cost ways of generating electricity, *“helping reduce costs and providing a clean and secure source of electricity supply”.*
- 2.46 Paragraph 3.2.8 confirms that the Secretary of State should (when considering applications for onshore wind of national scale) act on the basis need has been demonstrated.
- 2.47 Section 4.2 applies a policy presumption that, subject to any legal requirements (including under section 104 of the Planning Act 2008), the urgent need for ‘Critical National Priority’ (CNP) Infrastructure to achieving the UK’s energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy.
- 2.48 NPS EN-3 confirms that generating electricity from renewable sources is an essential element of the transition to Clean Power 2030 Mission, net zero and meeting the statutory targets of for the sixth carbon budget. It goes onto identify that demand for electricity could more than double by 2050 requiring a four-fold increase in low carbon energy generation with the majority likely to come from renewables (paragraph 1.1.2). It advises that more low-cost renewables in the system will reduce household electricity bills and increase security of energy supply (paragraph 1.1.3)

- 2.49 At paragraph 2.1.7, NPS EN-3 confirms that all onshore electricity generation not involving fossil fuel combustion are to be considered Critical National Priority Infrastructure (CNP).

Lancashire 2050

- 2.50 This strategy is organised around eight key priority areas, which includes “Environment and Climate”. To meet Lancashire’s low carbon ambitions, promote clean energy and enhance our rich natural environment, the key objectives of this area are:

- To substantially reduce carbon emissions and energy demand;
- To increase energy generation from low carbon sources, including renewables;
- To improve the resilience of infrastructure assets and services to climate change;
- To significantly grow the low carbon and environment sectors of Lancashire’s economy; and
- To retain our rich biodiversity and natural environment.

Whole System Smart Energy Plan: Greater Manchester

- 2.51 The vision with this strategy³⁹ for Greater Manchester is to be “a carbon neutral city region, with an energy system which is smart and fit for the future, low carbon and economically, environmentally and socially sustainable”.
- 2.52 The intention is to play a leading role in the low carbon transition, aiming to become an Energy Transition Region. The plan aims to ensure sustainable clean growth, which is smart, economically viable and provides energy security to Greater Manchester’s households, communities and businesses across the city region.
- 2.53 As increased national and local standards begin to drive innovation, it will also be crucial to stimulate skills and training in the sector, to enable roll out of retrofit measures and new infrastructure at the scale required. Presently, a shortage of suitably skilled contractors and labour force means that the sector is being held back from progressing at the rate that is comparable to other European countries.

Greater Manchester Five-Year Environment Plan: 2025-2030

- 2.54 The overall vision for the strategy⁴⁰ is to ‘ensure everyone in Greater Manchester has a healthy, low carbon, nature-rich environment in which to live-well, prosper and grow’.
- 2.55 There is an ambition to create a ‘Manchester-Energy Model’, a low carbon energy system, to assist with meeting the target of being carbon neutral by 2038. Such a system will be based around the three pillars of energy efficiency, energy generation and smart energy innovation. There is a particular commitment for homes, businesses and transport to be powered through renewable energy, built all over Greater Manchester, including onshore wind, to reduce transmission losses and give people more control over their energy bills (emphasis added).

³⁹ Greater Manchester Combined Authority (2019), Whole System Smart Energy Plan- Greater Manchester
⁴⁰ Greater Manchester Combined Authority (December 2024), Five Year Environment Plan (2025-2030)

- 2.56 The Environment Plan recognises the important role community wealth building can play in contributing to green growth, and will look where possible to redirect wealth back into the local economy through progressive procurement of goods and services, which support the development of good social enterprises and shorter supply chains.
- 2.57 The strategy sets out eight key aims for the city region, the key ones being:
- Energy infrastructure is smart, flexible and fit for a low carbon future;
 - The natural environment is enhanced, providing benefits for people, the economy and nature;
 - Air quality enhances the health, wellbeing and quality of life of the city region; and
 - The economy will grow sustainably because of the interventions we make to benefit both our residents and businesses.

Peatland & Moorland Restoration

- 2.58 Peatlands are “*areas of land with a naturally accumulated layer of peat, formed from carbon rich dead and decaying plant material under waterlogged conditions*”⁴¹. This build-up of decaying matter creates a rich organic soil that has a high carbon density, even when no longer wet. Peatlands therefore offer a range of benefits, including:
- Capturing carbon from the atmosphere and storing this in plant matter, helping to provide a net cooling effect on the climate.
 - Being rich in wildlife, containing a range of important species of flora and fauna.
 - Providing a sustainable supply of drinking water.
 - Intercepting and storing greater volumes of water, releasing it over a longer period of time and mitigating flood risk.
- 2.59 There are a range of national strategies which seek to promote restoration of the UK’s peatland, which has been subject to degradation through various means. These are considered in detail in the *Outline Peat Management Plan* but include:
- The ‘UK Peatland Strategy 2018-2040’⁴² which aims to drive and co-ordinate action across the UK, supported by country level plans that will establish a course for peatland conservation and management at a more detailed level. It sets the headline target from within the c.3 million ha of peatlands in the UK, to

⁴¹ Bain, C.G., Bonn, A., Stoneman, R., Chapman, S., Coupar, A., Evans, M., Gearey, B., Howat, M., Joosten, H., Keenleyside, C., Labadz, J., Lindsay, R., Littlewood, N., Lunt, P., Miller, C.J., Moxey, A., Orr, H., Reed, M., Smith, P., Swales, V., Thompson, D.B.A., Thompson, P.S., Van de Noort, R., Wilson, J.D. & Worrall, F. (2011) IUCN UK Commission of Inquiry on Peatlands. IUCN UK Peatland Programme, Edinburgh.

⁴² International Union for the Conservation of Nature (IUCN) UK Peatland Programme (2018). Available: [UK Peatland Strategy 2018_2040.pdf](#)

have “two million hectares of peatland in good condition, under restoration or being sustainably managed by 2040”.

- The ‘England Peat Action Plan’⁴³ which sets out the UK Government’s long-term vision for the management, protection and restoration of our peatlands, so that they provide a wide range of benefits to wildlife, people and the planet.
- The ‘England Peat Map’⁴⁴ which indicates that around three quarters of England’s peatlands are covered by plants and land use types associated with drier conditions, and that at least 37% is dominated by heather, which flourishes under dry conditions, while just 1% is dominated by Sphagnum mosses – a key peat-forming plant group associated with wetlands.
- The Natural England ‘Definition of Favourable Conservation Status of Blanket Bog (RP2967)’⁴⁵ which sets out views on favourable conservation status for Blanket Bog in England.

2.60 In accordance with the requirements of the Environment Act 2021, LCC and GMCA have both commenced the preparation of a Local Nature Recovery Strategy (‘LNRS’):

- LCC published its LNRS in January 2026. It establishes “a shared vision for collaborative nature recovery action to protect, enhance and connect our rich natural environment and biodiversity to benefit all Lancashire residents and visitors.”. It sets out a series of pressures and opportunities relating to various habitat types, including peatland (pages 85-94) and Biological Heritage Sites (pages 120-124) - these have been taken into consideration in developing the *Moorland Restoration and Management Plan* and *Outline Habitat Management and Monitoring Plan* which support this Application.
- The GMCA also published its LNRS in September 2025. The vision of the GM LNRS is: “for nature recovery in Greater Manchester is to work together to deliver a resilient network for nature across the city-region, connecting and enhancing wild spaces so that people and nature can thrive.” (page 48). The GM LNRS confirms that Greater Manchester’s “upland moorlands have been shaped not just by the underlying geology and location but also by centuries of historical clearance, industrial pollution and contemporary management practices, which has created a unique blend of habitats” (page 41). It adds that the upland moorlands “are crucial spaces not just for nature but also for outdoor recreation, offering long-distance trails and popular reservoirs. They also remain working landscapes and managed places used for raising livestock or grouse and supply water” (page 41). However, it recognises that the “uplands have been subject to drainage, pollution, grazing, burning and management over the 20th Century” and that “at present, only 10% of upland moorlands, over deep peat, are thought to be in good condition, 66% needs improvement and 24% is in poor condition” (page 41). The GM LNRS identifies that the Rochdale portion of the Site comprises a ‘core local nature site’ which aligns with the Rochdale Core Strategy

⁴³ DEFRA, (2021). Available: [England Peat Action Plan](#)

⁴⁴ Natural England & DEFRA (2025). Available: [A new peat map for England – Natural England](#)

⁴⁵ Natural England (2025). Available: [Definition of Favourable Conservation Status for Blanket bog - RP2967](#)

designations (covered in Section 9 of this PDAS). The GM LNRS (page 87-90) includes a series of opportunities, priorities, benefits and actions specifically relating to upland moorlands – these have been taken into consideration in developing the *Moorland Restoration and Management Plan* and *Outline Habitat Management and Monitoring Plan* which support this Application.

Other International, National, Regional and Local Strategies

- 2.61 The urgent need to address the causes of climate change, to reduce GHG emissions and for the deployment of additional renewable energy infrastructure is also set out in a range of international, national, regional and local statute, policy and guidance as summarised in Section 8 of this PDAS.

3. Site & Surroundings

- 3.1 This section of the PDAS provides a brief description of the Site and its surroundings; the rationale for site selection; and an overview of relevant planning history.

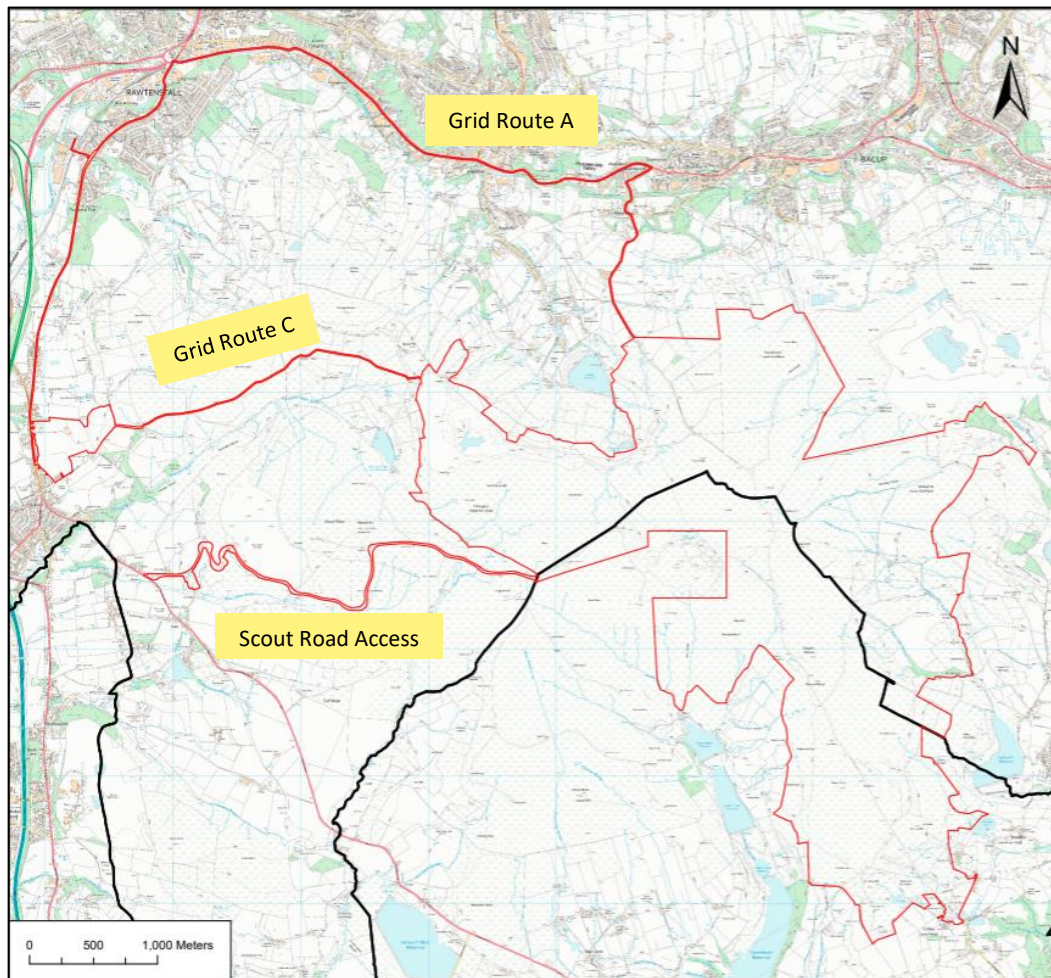
Overview of the Site

Site Location & Description

- 3.2 The Site encompasses 1,023.34 hectares (ha) of land (623.7ha in RBC and 399.64 in RMBC), as edged red on **Figure 3.1** and shown in full in the *Site Location Plan*. It comprises an area of open moorland between the urban areas of Rochdale, Bury, Blackburn, Accrington and Halifax, consisting of Rooley Moor, Scout Moor, Cowpe Moss and Brandwood Moor that collectively form part of the Southern Pennines.
- 3.3 The Site is strategically located within proximity of the existing Scout Moor Wind Farm ('SMWF') which is positioned on open moorland between Edenfield, Rawtenstall and Rochdale. SMWF, which comprises 26no. turbines with a total installed capacity of 65MW, was commissioned in September 2008 and is owned and operated by ENGIE.
- 3.4 The Site comprises three parcels:
- The main parcel, which will encompass the wind farm development and moorland restoration works. This parcel is bounded by Cowpe Reservoir, Lee Quarry Mountain Bike Trail and Whitworth Quarry to the north; the land adjacent to Cowm Reservoir and Spring Mill Reservoir to the east; Catley Lane Head to the south; and Naden Reservoir and Greenbooth Reservoir to the south-west. This part of the Site comprises of an irregular shaped parcel of open moorland, characterised by expansive and undeveloped terrain with a mix of rough grassland.
 - Grid Connection Route Option A, which extends northwards from the main parcel, following the alignment of Rooley Moor Road, connecting into Rakehead Lane and Brandwood Road, before heading westwards following the alignment of the A681 Newchurch Road / Bacup Road / Bocholt Way, terminating at the Rossendale Bulk Supply Point (BSP).
 - Grid Connection Route Option C⁴⁶. This extends westwards from the main parcel, following the alignment of an existing farm track connecting to the A680 Rochdale Road and heading northwards via the B6527 Market Street / Burnley Road / Moorlands View / Bury Road, terminating at the Rossendale BSP.

⁴⁶ Note: Within the main parcel of the Site, this is split into Route Options C1 and C2, as shown on the *Cable Route Options* drawing.

Figure 3.1: Site Location Plan (Site bounded in red, with the Local Authority Boundary in black)⁴⁷.



- 3.5 As set out in Section 1 of this PDAS, the Site is situated within the administrative boundaries of RBC (623.70ha) and RMBC (399.64ha)⁴⁸. The black line shown on **Figure 3.1** illustrates the administrative boundary, with land to the north of the black bold line within RBC and land to the south within RMBC.
- 3.6 There are no residential properties located within the Site. However, there are some existing properties located along Rooley Moor Road to the south. Further residential properties are located within Whitworth, to the east, as well as a cluster of properties situated to the north in the hamlet of Cowpe.
- 3.7 The Site's topography is defined by the significant changes in elevation and natural topographic features. It sits at an elevation of between 247m Above Ordnance Datum (AOD) and 476m AOD.

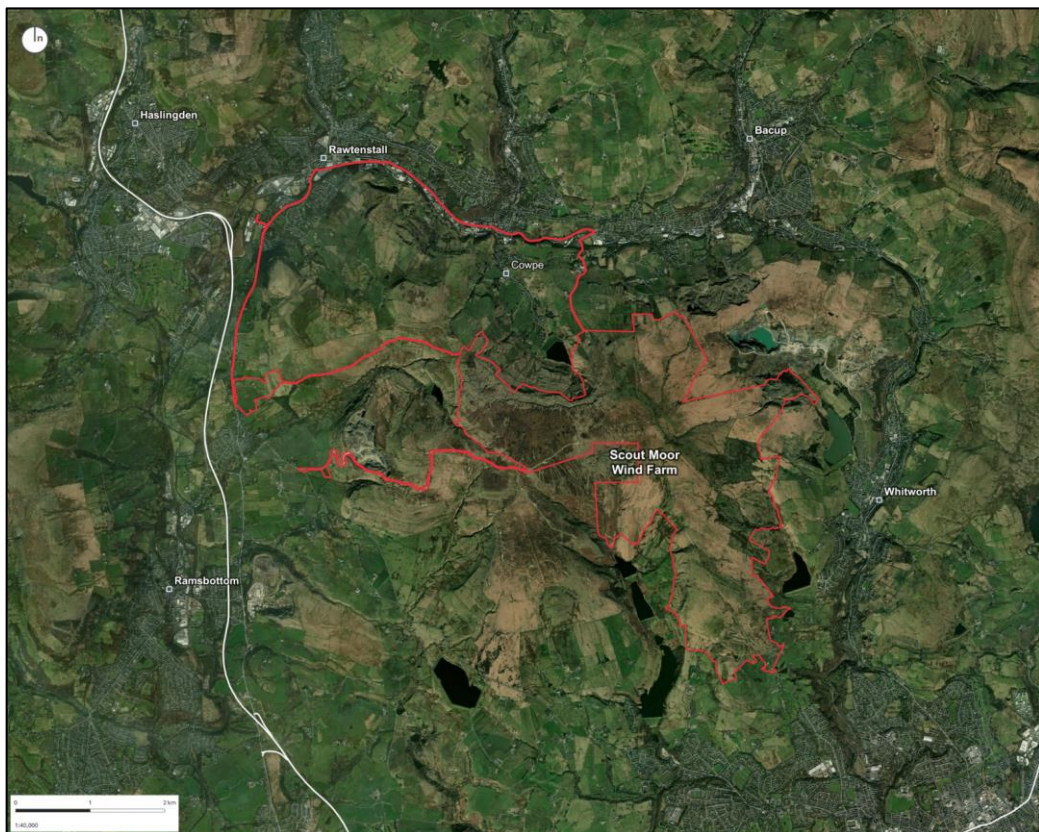
⁴⁷ As set out in Sections 6 & 7 of this PDAS, following revisions to the Proposed Development as part of this FEI Submission, the red line boundary has been amended, with previous Grid Route B deleted and Grid Route C introduced as an alternative. Please refer to the *Site Location Plan* for a scaled drawing.

⁴⁸ The distribution of land within the Site comprises 60.95% in Rossendale and 39.05% in Rochdale.

Surroundings

- 3.8 The main parcel of the Site is situated 2.5km south of Rawtenstall, 4km north of Rochdale, 6.5km northeast of Bury. The immediate surroundings of the main parcel are predominately open and undeveloped, characterised by upland moorland. The existing and operational SMWF, along with the associated track routes, is immediately to the west of the main parcel of the Site.
- 3.9 Built development exists in the wider context, including clusters of mainly residential settlements and commercial uses. To the north, development extends along the A681 Newchurch Road, comprising a mix of industrial uses and housing units. The settlement of Whitworth forms the main built area to the east. The southwest of the Site mainly comprises agricultural land. Edenfield and Ramsbottom, situated along the A56, are to the west of the Site.

Figure 3.2: Site surroundings



Source: Turley

Accessibility

Vehicular Access

- 3.10 Vehicular access to the Site will be via Scout Road, through the operational Scout Moor Quarry and SMWF. Other vehicular routes to the moor, including Rooley Moor Road, will not be used for vehicular access to the Proposed Development. Further detail on this is set out in Section 5 of this PDAS, as well as the *Transport Assessment*.

Public Access Network

- 3.11 The Site is closely connected to surrounding towns and villages, with residents of Rochdale, Norden, Greenbooth, Whitworth, Boarsgreave, Bacup and Edenfield regularly using the area for recreation. Public access routes provide vital green space connections, allowing communities to engage with the natural environment.
- 3.12 The Site contains a comprehensive access network comprising definitive public rights of way (PRoW), bridleways, permissive and informal paths, Open Access land (CRoW), and registered Common Land. These are set out in detail in the *Outdoor Access Enhancement and Management Plan* submitted with the Application.

Public Rights of Way

- 3.13 Key PRoW within the Site include:
- The most well-known PRoW within the Site is Rooley Moor Road, a historic upland route linking Rochdale to Bacup. Known as the "Cotton Famine Road", it is now a restricted byway, allowing access for walkers, cyclists, horse riders, and non-motorised vehicles, but excluding motorised vehicles. It forms a key spine route across the moor.
 - Multiple footpaths linking local settlements, including Whitworth, Bacup, Edenfield and Boarsgreave, to the open moorland.
 - Additional bridleways providing east-west and north-south connectivity across the Site.

Permissive and Informal Paths

- 3.14 The Site also contains a number of permissive and informal access routes, which are regularly used by walkers, cyclists, and horse riders. These are not recorded on the Definitive PRoW Map but are well-established on the ground, particularly around Lee Quarry and Cragg Quarry. These areas support recreational mountain biking and are promoted regionally by organisations such as Ride Rossendale.

Linkages to Wider Recreational Network

- 3.15 The Site includes recreational trails that form part of longer distance route, including:
- The Pennine Bridleway, a National Trail passing near the site, including the Mary Towneley Loop, which is used by horse riders, cyclists and walkers.
 - The Rossendale Way, a circular walking route traversing the surrounding moorland.
 - The Rochdale Way, a long-distance trail encircling Rochdale and connecting to adjacent upland areas.
- 3.16 These access features make the Site an integral part of the local and regional recreational network.

Open Access Land

- 3.17 Large areas of the Site are designated as Open Access Land under the Countryside and Rights of Way (CROW) Act 2000. This designation grants a statutory right of access on foot for recreation. These areas are mapped by Natural England and are publicly accessible irrespective of the presence of PROWs.

Common Land

- 3.18 The Site is partially designated as Common Land, as listed in the registers held by Lancashire County Council and Rochdale Borough Council. Common Land in this area often coincides with CROW Access Land, providing overlapping public rights of access.
- 3.19 Common Land is legally protected under the Commons Act 2006, which regulates its status and safeguards the rights of commoners, including long-established rights of grazing and land management. Importantly, public access to Common Land is provided under the Countryside and Rights of Way (CROW) Act 2000, which designates most registered commons as “Access Land” and grants the public a legal right to walk freely across them on foot.
- 3.20 The cultural and functional significance of this landscape is well established. As well as being a valued open space for walkers, residents, and recreational users, Common Land supports active grazing, with local commoners using 4x4 vehicles to manage stock and access the moor for land management purposes. These practices form an essential part of the landscape’s heritage and ongoing stewardship.

Environmental & Nature Conservation Designations

- 3.21 The Site does not form part of a nationally designated landscape with the nearest such designations being the Peak District National Park (15km south-west) and the Forest of Bowland National Landscape (17km north-west).
- 3.22 There are no internationally or nationally designated sites for nature conservation within the Site. However, the following are in proximity to the Site:
- The closest internationally designated site is the Rochdale Canal Special Area of Conservation (SAC) located approximately 16km south-east of the Site, followed by the South Pennines Moors Special Protection Area (SPA) which is located approximately 69km east of the Site.
 - At a national level of designation:
 - The Lee Quarry Site of Special Scientific Interest (SSSI) is located immediately adjacent to the Site. Therefore, the Site is situated within the SSSI Impact Risk Zone for the Lee Quarry SSSI.
 - The South Pennines Moors SSSI & SPA is located approximately 69km east of the Site. Therefore, the Site is situated within the SSSI Impact Risk Zone for the South Pennines Moors SSSI.

- The Rochdale Canal SSSI is located approximately 16km south-east of the Site. Therefore, the Site is situated within the SSSI Impact Risk Zone for the Rochdale Canal SSSI.
- The West Pennine Moors SSSI, Hodge Clough SSSI and Lower Red Lees Pastures SSSI are located approximately 4km to the west. Therefore, the Site is situated within the SSSI Impact Risk Zone for these SSSI's.
- The Healey Dell Local Nature Reserve (LRN) is located approximately 750m to the southeast and Gorpley Clough LRN is located approximately 800m to the northeast.

Heritage Designations

- 3.23 The north-western part of the Catley Lane Head Conservation Area falls within the southern part of the main parcel of the Site. The Site does not contain any other designated heritage assets. The Site does include non-designated heritage assets, however, including Rooley Moor Road.
- 3.24 The *Heritage Assessment (Volume 2, Appendix 12.1 of the Environmental Statement)* submitted with the Application identifies all designated heritage assets⁴⁹ within 15km of the Site and all non-designated heritage assets within 5km. This includes a total of 92 Conservation Areas, 46 Scheduled Monuments, 2,716 listed buildings, 22 Registered Parks and Gardens and numerous non-designated heritage assets.
- 3.25 Full details of the heritage assets within and surrounding the Site is set out within the Heritage Assessment.

Hydrology and Flood Risk

- 3.26 A number of watercourses cross the Site and drain to surrounding reservoirs.
- 3.27 The Flood Risk Map for Planning identifies that the Site is located within flood zone 1 and is therefore at low probability of flooding from rivers and the sea. The Site has a moderate surface water flood risk due to the presence of a significant flow path running through the Site. The Site is considered to be at a low flood risk from other sources (including fluvial, coastal and tidal, groundwater, sewers, canals, reservoirs and waterbodies).

⁴⁹ Conservation Areas, Listed Buildings and Scheduled Ancient Monuments

- 3.28 The Site is covered by Drinking Water Safeguard Zones (Surface Water)⁵⁰ for Cowpe⁵¹ (north), Watergrove⁵² (east), Clay Lane⁵³ (central/south) and Ashworth Moor⁵⁴ (north west).

Peatland

- 3.29 Natural England's records⁵⁵ indicate that large areas of the Site are underlain by peat of variable depth (shallow and deep). Some of this peat is currently in a degraded condition, which can be attributed to factors such as unsuitable livestock management practices and the illicit use of moorland by off-road vehicles.
- 3.30 Detailed peat surveys have been completed across the Site, the results of which are presented within the *Environmental Statement* submitted with the Application. In summary, this has demonstrated that the Site is underlain by varying depths of peat, the majority of which is between 0.3m and 1m depth. The surveys also indicate that the peat on-site is experiencing erosion in numerous locations and will continue to do so without intervention. There are numerous gullies of varying size which are draining and dewatering the peatlands, and transferring peat particles away from the Site and into watercourses. There are areas of bare peat at the base of the gullies, and at the margins peat is often exposed and is resulting in continued gradual degradation.

Site Selection Process

- 3.31 In order to identify an area of land appropriate for commercial scale wind development, Cubico adopts a three-stage site selection screening process prior to a project progressing to planning application stage. This process reflects the factors which may influence site selection for onshore wind projects identified in National Policy Statement EN-3 (paragraphs 2.12.7 – 2.12.28)⁵⁶.

Stage 1 Viability

- 3.32 Prior to project commencement, Cubico went through a process in England, Scotland and Wales (Great Britain) of identifying areas of appropriate wind speed and therefore areas that would generate energy yields suitable for a commercial scale onshore wind farm (generally a consistent and high wind speed is required) utilising a mixture of

⁵⁰ Drinking Water Safeguard Zones (Surface Water) are catchment areas that influence the water quality for their respective Drinking Water Protected Area (Surface Water). They are identified where the protected area has been assigned as being "at risk" of failing the drinking water protection objectives of the Water Environment (Water Framework Directive) (England & Wales) Regulations 2017. These Safeguard Zones are a non-statutory, joint initiative between the Environment Agency and water companies that define areas where actions and measures will be targeted to address water contamination and avoid or minimise extra treatment needed by water companies.

⁵¹ [Surface Water Safeguard Zone Action Plan: Cowpe \(data.gov.uk\)](#) – associated with the Drinking Water Protected Area (Surface Water) for Cowpe Reservoir.

⁵² [Surface Water Safeguard Zone Action Plan: Watergrove \(data.gov.uk\)](#) – associated with the Drinking Water Protected Area (Surface Water) for Watergrove Reservoir and Springmill Reservoir.

⁵³ [Surface Water Safeguard Zone Action Plan: Clay Lane \(data.gov.uk\)](#) – associated with the Drinking Water Protected Area (Surface Water) for Middle Naden Reservoir, Lower Naden Reservoir and Greenbooth Reservoir.

⁵⁴ [Surface Water Safeguard Zone Action Plan: Ashworth Moor \(data.gov.uk\)](#) – associated with the Drinking Water Protected Area (Surface Water) for Ashworth Moor Reservoir.

⁵⁵ [Peaty Soils Location \(England\) | Peaty Soils Location \(England\) | Natural England Open Data Geoportal \(arcgis.com\)](#)

⁵⁶ [National Policy Statement for renewable energy infrastructure \(EN-3\), 2025 \(accessible webpage\) - GOV.UK](#)

softwares (e.g. ArcGISPro) and various wind speed data resources. This process eliminates most areas in Great Britain due to several factors (areas of lower wind speeds, built-up areas, etc) leaving potential areas for a wind farm.

3.33 Following that process, areas identified for potential wind farms are screened against a series of factors to ensure a development is in an area which is logistically and economically viable including:

- Proximity to a grid connection point – The larger the distance to a substation the greater the cost of the commercial connection of a wind farm (i.e. due to increased cabling or the requirement for new electrical infrastructure e.g. OHL's / substations). Therefore, calculations take into consideration the potential scale of a wind farm vs grid connection cost. If the grid connection cost estimation is too large against the predicted commercial yield of a project, then these sites are excluded;
- Grid capacity availability and speed of connection – Where there is little / no grid capacity in a region, greater infrastructure updates are required (e.g. substation upgrades) to absorb a commercial scale wind farm taking a greater amount of time and cost before energy can be distributed onto the grid. Therefore, where there is identified grid capacity in a region and an opportunity to secure a quicker grid connection date these areas are favoured; and
- Military land use areas / airfield buffers / aviation constraints – A lot of areas which show initial suitability for a wind farm are in areas used for military purposes or are of aviation interest. These areas are identified, and any unacceptable areas are excluded (e.g. areas within 5km of an airport).

Stage 2: Environmental Designations

3.34 Following this initial site viability process, the potential sites are then assessed in relation to proximity to several statutory and non-statutory environmental constraints including:

- National Parks;
- National Scenic Areas (Scot);
- National Landscape Areas (Eng & Wales);
- Sites of Special Scientific Interest;
- Special Protection Areas;
- Special Areas of Conservation;
- Ramsar;
- National Nature Reserves.
- Local Nature Reserves;

- Registered Parks and Gardens;
- Scheduled Monuments;
- World Heritage Sites;
- Registered Battlefields;
- Conservation Areas;
- Listed Buildings; and
- Ancient Woodland.

3.35 These designations are applied to the viable areas identified at Stage 1 which further reduces the land areas available for commercial wind development. Although this process does not negate the occurrence of likely significant effects of a potential project, it is considered an essential step to exclude those areas of Great Britain that are of greatest sensitivity.

3.36 Following the Stage 1 and Stage 2 screening process the Site was identified noting its recorded consistent and high wind speed, the proximity to and confirmed available capacity at the Rossendale BSP, and its location not being within any of the environmental constraints identified above.

Stage 3: Land / Legal Agreements

3.37 Having identified the Site as being suitable following completion of the Stage 1 and 2 assessment process, Cubico commenced the process of securing land and legal agreements with all relevant landholders and common land rights holders, as well as securing a grid connection offer of up to 99.9MW, linked to the Rossendale BSP, from SP Electricity North West (the Distribution Network Operator).

4. Planning History

- 4.1 A review of the LPA records for the Site, identifies the following planning history of relevance to the Proposed Development.

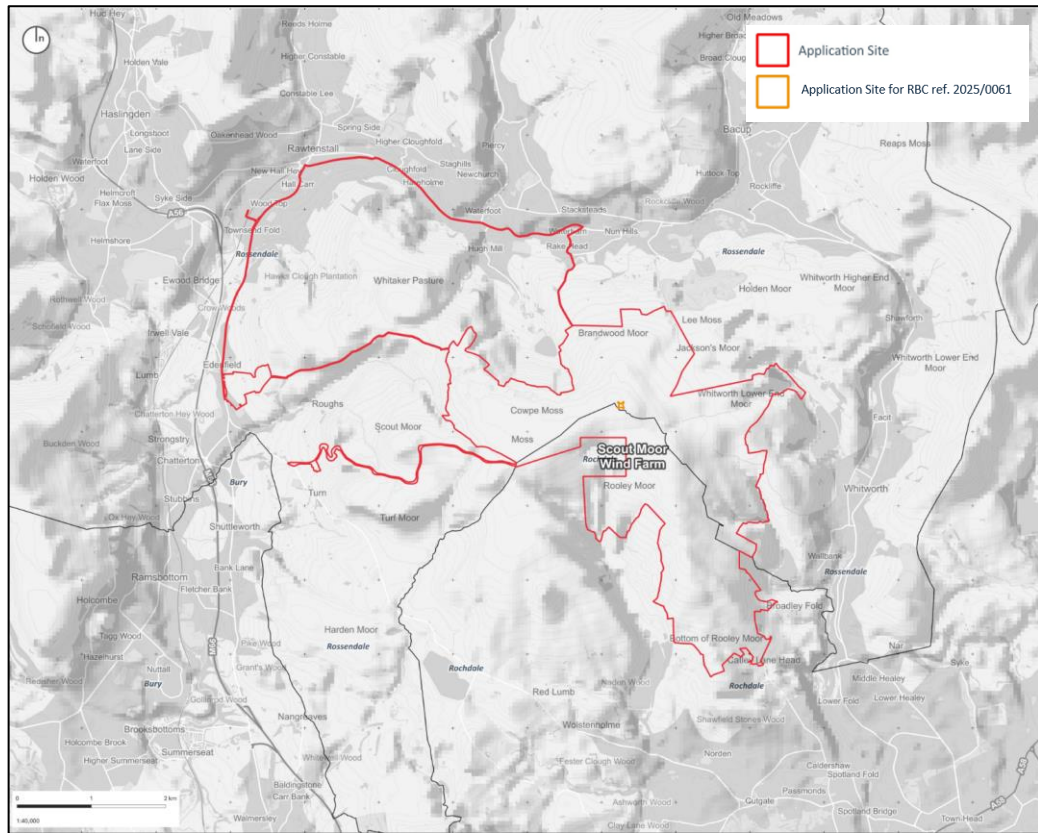
Environmental Impact Assessment

- 4.2 Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (hereafter referred to as the 'EIA Regulations') identifies projects where an EIA is required. The EIA Regulations implement the requirements of the European Community's Directive on Environmental Assessment (85/337/EEC), as amended by the Council Directive No. 97/11/EC and 2011/92/EU. Further guidance is provided in the National Planning Practice Guidance (PPG).
- 4.3 An EIA Scoping Opinion Request was submitted to RBC and RMBC on 17th December 2024 (RBC LPA ref. 2024/0495 and RMBC LPA ref. 24/01241/SCO). A Scoping Opinion has not yet been received at the time of writing (June 2026). In the absence of a Scoping Opinion, the scope of the *Environmental Statement* has been informed by the EIA Scoping Report and consultation responses received in response to the request for a Scoping Opinion and in response to the 2025 Submission.

Temporary Meteorological Mast

- 4.4 To further inform the assessment of prevailing environmental conditions for the Proposed Development and to collect a minimum of 24 months weather data, a met mast is required to be erected on land within the potential development area for the Scout Moor II proposals. The monitoring data generated by the proposed met mast will assist in securing funding for the Scout Moor II wind farm from the selected turbine supplier, as well as supporting the construction and future operation of the wind farm.
- 4.5 Full planning permission for the erection of a temporary meteorological mast with associated data collection and monitoring equipment, and other ancillary infrastructure for a period of 36 months (RBC ref. 2025/0061) was granted by RBC on 25 June 2025. Following the confirmation of pre-commencement condition discharge (RBC ref. 2025/0383), the met mast became operational on 20 September 2025.
- 4.6 The met mast is located at grid reference SD 85258 19420 and its location in relation to the Site is shown in **Figure 4.1**.

Figure 4.1: Met Mast Location



Scout Moor Wind Farm

- 4.7 The existing SMWF is located within RBC and RMBC local authority boundaries and comprises a wind turbine generating station with an installed capacity of 65MW, including:
- 26no. Nordex N80 wind turbine generators, each with a hub height of 60m, height to blade tip of 100m and installed capacity of 2.5MW per turbine.
 - 2no. anemometry masts.
 - Underground 33kV electrical cabling.
 - An electrical substation.
 - Various other ancillary infrastructure, including crane pads and access tracks.
- 4.8 Consent under Section 36 of the Electricity Act 1989 and deemed planning permission under Section 90(2) of the TCPA 1990 (as amended) for the construction and operation of SMWF was granted by the Secretary of State ('SoS) for Trade & Industry on 25 May 2005 (Ref. GBDC/003/00005c-02).
- 4.9 In addition, three Orders were granted for the exchange of Common Land under Section 147 of the Enclosure Act 1845 by the SoS for Environment, Food and Rural

Affairs ('DEFRA') on 5 May 2006 – the applications for these Orders having been made prior to the 2006 Commons Act coming into effect.

- 4.10 SMWF was constructed between 2007 and 2008 and began exporting electricity to the local electricity distribution network in July 2008⁵⁷.
- 4.11 The consent / deemed planning permission is temporary for a period of 25 years. Condition 2 of the deemed planning permission requires all above ground elements of SMWF (excluding access tracks) to be removed and the land restored, in accordance with a detailed restoration scheme approved in writing by RBC and RMBC, at the expiry of the 25 year period – SMWF (excluding access tracks) is therefore required to be decommissioned from July 2033.
- 4.12 SMWF is presently the largest onshore wind farm by installed capacity (65MW) and joint largest by number of turbines (26no.) in England. It can generate enough electricity to power up to the equivalent of 37,788 homes each year and offset the emission of up to 68,115 tonnes of carbon dioxide ('CO₂') annually. Ownership transitioned from Peel Wind Power Limited to MEAG in 2012, and to ENGIE in 2025.
- 4.13 The financial revenues generated by SMWF have supported the establishment of a Habitat Enhancement Fund (HEF). This has funded environmental improvements works, aimed at the maintenance, restoration and re-establishment of habitat and wildlife interests. To date, this has included the re-wetting of over 200 hectares of bog, the prevention of further peat erosion, the restoration of moorland flora and habitat restoration for moorland fauna. The HEF has a total value of around £500,000 and will continue until 2033.
- 4.14 SMWF has also been used as an educational resource hosting visits from a number of local schools and wider community interest groups and the access tracks associated with the development are regularly used by walkers, horse-riders and those on mountain bikes.

Previous Wind Farm Proposals

- 4.15 Two previous proposals for onshore wind farms in this location have previously been considered by RBC and RMBC, including:
- Proposal by Scout Moor Wind Farm Expansion Limited to expand the SMWF with up to additional 16no. wind turbines (with a maximum height to the tip of the blade of 115 metres (above ground level)) and associated infrastructure for a temporary period of 25 years (RBC LPA ref. 2015/0112 and RMBC ref. 15/00395/FUL). The proposal comprised 14no. turbines in Rossendale and 2no. turbines in Rochdale. Whilst the proposal was supported locally by RBC and RMBC, the application was 'called in' by the Secretary of State, who issued a split decision on 6th July 2017 confirming:

- Refusal of planning permission for the portion of development proposed in RBC's administrative boundary (i.e. 14no. turbines and ancillary development).
- Approval of planning permission for the portion of development proposed in RMBC's administrative boundary (i.e. 2no. turbines and ancillary development), for a temporary period of 25no. years. However, this was never implemented and therefore the consent has lapsed.
- Proposal by Coronation Power for the construction and operation of 12no. wind turbines (maximum height to tip of 125m) and associated infrastructure and works on land to the east and west of Rooley Moor Road (RBC LPA ref. 2014/0388 and RBMC LPA ref. 14/00877/FUL). Both RBC and RMBC refused the application in 2014, and a subsequent appeal was withdrawn.

5. Consultation

- 5.1 This section of the PDAS provides an overview of consultations and stakeholder engagement undertaken prior to the submission of the Application in 2025. It also considers the responses received by the Councils as part of the statutory consultation in respect of the 2025 Submission, and how the Applicant has sought to address these.
- 5.2 In accordance with NPPF Policy DM1(1)(a), the Proposed Development has been informed by early and proportionate engagement with neighbours and the local community, as well as with the local planning authorities, statutory consultees and other relevant stakeholders in order to identify and seek to resolve key planning matters prior to the submission of the Application.

Pre-Application

Local Planning Authorities, Statutory & Non-Statutory Consultees

- 5.3 Extensive pre-application engagement was undertaken with the Councils over an extended period commencing in Summer 2024, to evolve the detail of the Proposed Development, and to agree the scope of the Applications, including the drawings and documents to be submitted.
- 5.4 Detailed briefing sessions (online) were held with officers from RBC⁵⁸ and RMBC⁵⁹, as well as statutory⁶⁰ and non-statutory⁶¹ consultees in January 2025, to provide an overview of the Proposed Development and the approach to assessment within the Application – this provided officers and consultees the opportunity to provide comments and ask questions which have been taken on board in the preparation of the Application.
- 5.5 A Consultation Approach document was prepared and shared with relevant LPA stakeholders in advance of the consultation launch, to ensure all parties were comfortable with Cubico's approach to engagement and had the opportunity to provide their comments.
- 5.6 Engagement with officers and consultees has continued throughout the preparation of the Applications and, where necessary, a summary of this consultation is included in application reports and the *Environmental Statement* on a topic-by-topic basis.

⁵⁸ This included RBC officers from the following teams: Development Management & Planning; Economic Development; and Climate Change. It also included Lancashire County Council officers from the following teams: Highways; Flood Risk Management; and Archaeology.

⁵⁹ This included RMBC officers from the following teams: Development Management & Planning; Highways & Engineering; Public Rights of Way; Lead Local Flood Authority; Environmental Protection; Strategic Planning; and Climate Resilience.

⁶⁰ The following organisations attended the briefing session: Greater Manchester Ecology Unit (GMEU) (acting as ecological advisors to RBC and RMBC); Greater Manchester Archaeological Advisory Service (acting as archaeological advisers to RMBC); the Mining Remediation Authority; Natural England; Historic England; and United Utilities. The Environment Agency was also invited but chose not to attend.

⁶¹ The following organisations attended the briefing session: Royal Society for the Protection of Birds (RSPB); Lancashire Wildlife Trust; and Lancashire Badger Group.

Stakeholder & Community Engagement

- 5.7 A *Statement of Community Involvement* ('SCI') was submitted alongside the Applications in July 2025. This details the extensive engagement which was undertaken with the local community and other key stakeholders, including landowners, elected representatives, community groups, local business and education institutions, in respect of the Proposed Development prior to submission of the Applications. It confirms that a fully inclusive consultation process was undertaken.
- 5.8 For the sake of brevity, the detailed scope, methodology and outcomes of the stakeholder and community engagement undertaken is not replicated here and cross reference should therefore be made to the SCI. However, a summary of the SCI is set out below.
- 5.9 From the outset, Cubico recognised that securing genuine local involvement is not just a policy requirement, but a critical enabler of project success. Good community engagement helps to build support, identify and address local concerns, shape better project outcomes, and unlock wider opportunities and benefits for the local area. This approach has underpinned the consultation strategy for Scout Moor II from the outset.
- 5.10 Cubico has delivered a comprehensive consultation programme that aligned with national government and local authority guidance and went beyond recognised industry best practice. While the process included two formal consultation phases — each with public exhibitions and formal feedback opportunities — engagement did not begin and end there. Between these phases, the project team maintained ongoing dialogue with residents, local groups, and stakeholders, ensuring the conversation remained open and responsive throughout.
- 5.11 Between November 2024 and April 2025, **nine public exhibitions** were held across the Rossendale and Rochdale areas, supported by **three technical webinars**, a dedicated website which attracted almost **30,000 visits**, and widespread social media and press outreach reaching **hundreds of thousands of people**. In total, over **300 pieces of formal feedback** were received, alongside targeted discussions with elected representatives, community groups, environmental organisations and local businesses. Leaflets were delivered to around **40,000 addresses** across two phases, and the consultation reach extended across diverse geographies, age groups and stakeholder interests.
- 5.12 The consultation showed strong local support for renewable energy in principle, alongside a clear desire for projects to be designed and delivered in close dialogue with communities. Many residents raised questions about visual impact, environmental protection, private water supplies, access and transport, and the governance of community benefit.
- 5.13 In response, Cubico made a number of changes to the Proposed Development and its engagement strategy. These included:
- Reducing the number of turbines from 21 to 17, in response to visual and environmental concerns.

- Refining the layout to avoid deeper peat areas and improve separation from homes and public rights of way.
- Removing a turbine near Whitworth based on local feedback.
- Publishing a Community Benefit Charter, committing to either £6,000/MW or 3% of gross project revenue – whichever is greater – per annum , linked to inflation and governed by an independent local community development trust.
- Reiterating that Rooley Moor Road will not be used for construction or operational access of the proposed wind farm, with a single protected crossing introduced away from the most sensitive sections (in heritage terms).
- Hosting technical webinars and publishing detailed topic papers to clarify complex issues such as noise, shadow flicker, peatland restoration and access.
- Introducing dedicated mechanisms to capture information on unrecorded private water supplies, informing the Environmental Impact Assessment.

Response to 2025 Submission

- 5.14 As set out in Section 1 of this PDAS, the Applications were originally submitted on 23 July 2025 and were validated by the Councils on 07 August 2025. Following the completion of an extended period of statutory consultation on the Applications, the Applicant has evolved the Proposed Development to respond to the comments received and is hereby formally amending the Applications through the submission of FEI. The FEI supersedes the 2025 Submission and will be subject to further statutory consultation by the Councils.
- 5.15 The Applicant has prepared the following documents which are submitted as part of the FEI Submission, and which summarise its response to the comments received from statutory and non-statutory consultees and the local community:
- *Applicant's Summary Response to Statutory and Non-Statutory Consultee Comments.*
 - *You Said, We Heard, We Acted – Applicant's Summary Response to Public Consultation Comments.*

6. Design Approach

Overview

- 6.1 The design of the Proposed Development has emerged through an iterative process which has sought to balance the need to avoid, reduce and minimise adverse environmental effects wherever possible whilst also seeking to optimise renewable energy generation and the benefits associated with implementation of the *Moorland Restoration & Management Plan*. The need to ensure that local communities can continue to enjoy the landscape and natural environment of the Site and wider area both during the construction and operation of the wind farm has also been a key consideration and is reflected in the submitted *Outdoor Access Management & Enhancement Plan*.
- 6.2 Over a period of approximately 12 months, prior to the 2025 Submission, the scheme design was periodically reappraised in response to technical, functional and safety-led design requirements, adopted planning policy, site-specific studies, early engagement with stakeholders (including the local community) and a clear understanding of the sensitivities of the moorland landscape. This design evolution has continued since the 2025 Submission, with this FEI Submission representing the Applicant's response to feedback received during the statutory consultation, as well further detailed environmental surveys and engagement with turbine suppliers (OEMs).
- 6.3 The design also responds to the operational context of the existing SMWF.

Design Policy Context

- 6.4 The design of the Proposed Development has been informed by a range of planning policy considerations, as well as good practice guidance as detailed in Section 9 of this PDAS, alongside **Appendix 1**. This includes all Development Plan policies relating to the design of new development, and onshore wind farms specifically, as well as adopted SPDs and the national planning policies contained within the NPPF (specially Chapter 14 – Policies DP3 and DP4) and other national-level documents, including:
- Design: Process & Tools PPG⁶²
 - Renewable & Low Carbon Energy PPG⁶³
 - National Design Guide⁶⁴
 - NPS EN-1⁶⁵, Section 4.7

⁶² Guidance – Design: process and tools (MHCLG, October 2019). Available: [Design: process and tools - GOV.UK](#)

⁶³ Guidance – Renewable and low carbon energy (MHCLG, August 2023). Available: [Renewable and low carbon energy - GOV.UK](#)

⁶⁴ Guidance – National Design Guide (MHCLG, January 2021). Available: [National design guide - GOV.UK](#)

⁶⁵ Overarching National Policy Statement for Energy (EN-1) (DESNZ, January 2026). Available: [Overarching National Policy Statement for energy \(EN-1\), 2025 \(accessible webpage\) - GOV.UK](#)

- NPS EN-3⁶⁶, Section 2.12

- 6.5 The design process has also been informed by NatureScot's guidance *entitled 'Siting and Designing Wind Farms in the Landscape (Version 3a)'*⁶⁷. Good design principles for wind farms are becoming more established following approximately two decades of wind farm development in Scotland with around 300 wind farms constructed and operating. NatureScot's intention is for the guidance to produce development which is appropriate to a landscape. Guidance is provided on the appropriate turbine form, size, scale, layout and on the siting and design of wind farms in relation to landscape character, landscape with scenic value, landscape pattern, landform, perspective and focal features. Whilst it is intended to guide development within Scotland's landscapes the design principles which it presents are equally relevant to the Proposed Development.
- 6.6 The generic guidance on siting, layout and design of wind energy developments presented within Appendix 3 of the *'South Pennines Wind Energy Landscape Study'*⁶⁸ has also been considered in designing the Proposed Development.

Design Strategy

- 6.7 The design process has been guided by several key principles which include but are not limited to the following:
- Avoiding deep peat and ecologically sensitive ground wherever possible;
 - Safeguarding the amenity of residential properties in relation to noise, visual amenity and shadow flicker;
 - Minimising the number of turbines visible from sensitive public viewpoints;
 - Reducing visual prominence from cultural and landscape designations;
 - Prioritising use of the existing access track network associated with SMWF to avoid additional land take;
 - Aligning turbine layout with wind resource potential while respecting site constraints;
 - Responding to topography to reduce cut-and-fill, track visibility, and physical impacts; and
 - Recognising the impact of physical interaction with recreational routes, including the Pennine Bridleway, where construction could temporarily affect access or user experience.

⁶⁶ National Policy Statement for renewable energy infrastructure (EN-3) (DESNZ, January 2026). Available: [National Policy Statement for renewable energy infrastructure \(EN-3\), 2025 - GOV.UK](#)

⁶⁷ Siting and Designing Wind Farms in the Landscape – Version 3a (NatureScot, August 2017). Available: [Siting and designing wind farms in the landscape - version 3a | NatureScot](#)

⁶⁸ South Pennines Wind Energy Landscape Study (Julie Martin Associates, October 2014). Available: [South Pennines Wind Energy Landscape Study Final Report](#)

- 6.8 This approach ensures the Proposed Development sits comfortably within the upland setting and builds positively on the form and composition of the existing SMWF.

Environmental Constraints and Mitigation by Design

- 6.9 Environmental constraints were identified through desk-based analysis, site surveys, and consultation feedback. These informed the design process and helped embed mitigation through avoidance or refinement of layout. The way key constraints have influenced the scheme design include:

- **Landscape and Visual:** The proposed layout ensures turbines remain on the moorland plateau, avoiding visual spill into surrounding valleys and maintaining a horizontal skyline. This also includes maintain a buffer to residential properties to minimise potential for residential visual amenity impact.
- **Ecology:** Sensitive habitats, including blanket bog and species-rich grassland, have been avoided where possible through careful siting and track routing.
- **Hydrology & Private Water Supplies:** A 50m stand-off from all mapped watercourses has been applied where possible. Private water supplies have been identified and assessed, with turbine locations adjusted accordingly.
- **Noise:** Layout iterations included noise modelling to ensure compliance with national guidance for the assessment and rating of wind turbine noise (ARWTN). Proposed turbines were removed or relocated where necessary to protect residential amenity.
- **Built & Cultural Heritage:** The design process took account of intervisibility with designated heritage assets and the contribution of setting to the significance of individual assets. Known archaeological features were avoided entirely.
- **Peat:** Desk-based peat depth mapping, complemented by detailed on-site peat probing, was utilised to identify peat deposits across the Site, with the design and layout seeking to avoid areas of deep peat.
- **Public Rights of Way (PRoW):** A 200m buffer was applied to Rooley Moor Road (part of the Pennine Bridleway national trail and Mary Townley Loop).
- **Topography and Gradient:** Slopes exceeding 15% were excluded due to construction and stability concerns.
- **Mining Risk Areas:** Areas identified as having high subsidence risk from historical mining were excluded from turbine and track siting.

Turbine Layout Iteration

- 6.10 A number of layout options were considered and refined over time, each informed by further and more detailed environmental information, feedback from consultees, and opportunities to reduce potential impacts while maintaining a commercially viable project.

- 6.11 Following an initial desktop-based constraints mapping exercise, an initial layout of 24-turbines was prepared in June 2024 for Cubico internal feasibility testing only. Following a series of site visits and subsequent technical studies this layout was refined to a 21-turbine proposal, the maximum extent of which was utilised to define the Turbine Development Zones (TDZ) submitted as part of the EIA Scoping Report⁶⁹. This layout also formed the basis of the information provided at the first public consultation held between 5 to 26 November 2024. Following stakeholder feedback and further design evolution, an 18-turbine layout was developed and formed the basis of the 2nd public consultation held between the 25 March and 29 April 2025. Following consultation, a further single turbine was removed to form the 17-turbine layout on which the 2025 Submission was based. In response to the feedback received on the 2025 Submission, the layout has been reduced to 12-turbines (a reduction of 5-turbines) and this forms the basis of this FEI Submission.
- 6.12 A detailed breakdown of the key decisions made in respect of each of the five iterations is provided below, but in summary the key environmental reasoning for alterations to the Proposed Development (including removals and repositioning) are as follows:
- Moving turbines out of areas of peat / deeper peat to avoid or reduce adverse impacts to the peatland resource;
 - Moving turbines out of areas of archaeological potential to avoid or reduce the potential adverse environmental effects through loss or disturbance;
 - Moving turbines out of identified mining risk areas to ensure structural stability; and
 - Moving some turbines more centrally within the Site to lessen or avoid adverse impacts to landscape character, visual amenity, heritage assets and residential properties.
- 6.13 Several other factors were taken into consideration for the movement of turbines including:
- Energy yield – detailed energy yield studies found that the turbine spacing between some turbines would have led to a greater level of deterioration of the wind turbines, because of wind turbulence. As such, the spacing between some turbines was increased.
 - Engineering constraints – some turbines were moved out of more constrained areas (i.e. high slope angle) to reduce the level of engineering works required to construct.
- 6.14 In parallel with considerations relating to layout, consideration was also given to the appropriate height of turbines in different parts of the Site. Through the completion of

⁶⁹ To allow flexibility of the turbine layout to evolve in response to environmental and engineering constraints (beyond the EIA Scoping timescales) and feedback from the public consultation Turbine Development Zones were utilised to demarcate the maximum spatial extent of the turbines whilst the layout was under development.

more detailed baseline surveys and interim assessment work it was concluded that the Site could accommodate turbines of up to 180 metres in height in all locations, principally by locating all turbines more centrally.

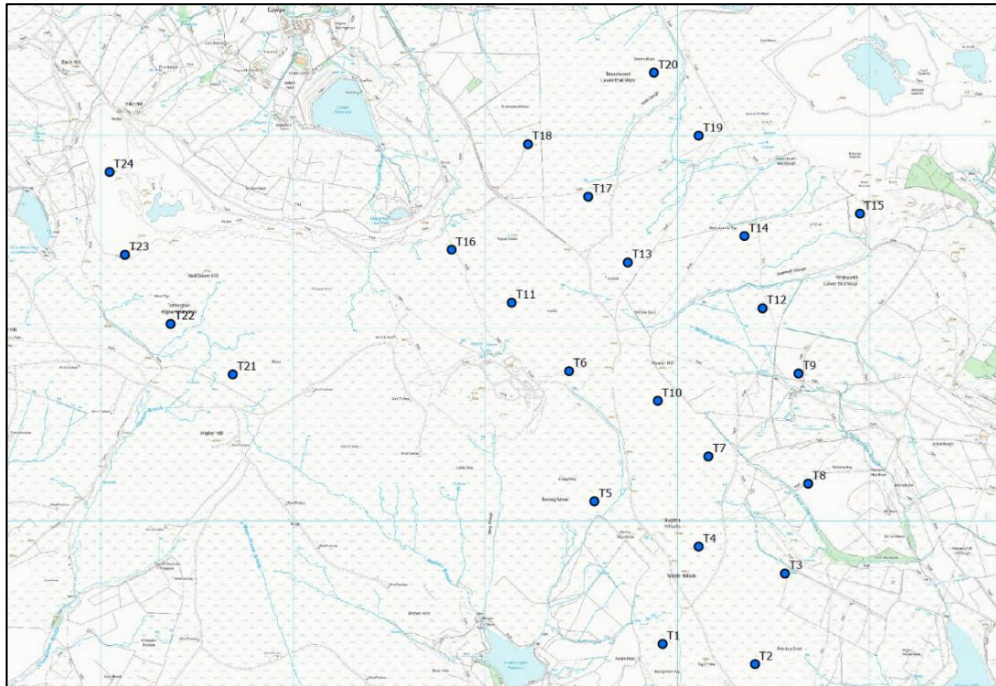
Layout Iteration 1: 24 Turbines (June 2024)

- 6.15 As shown in **Figure 6.1**, an early concept layout was prepared to test the technical feasibility of the Site and inform the first site visit. This was used as a baseline to identify fixed topographical, hydrological and environmental constraints as well as potential development opportunities. These constraints included:

- Watercourses;
- Slopes >15% gradient;
- Public Right of Ways;
- Telecommunications infrastructure;
- Residential properties;
- Electrical infrastructure;
- Designated ecological or archaeological features;
- Land within 1 km of residential properties;
- Land outside the moorland plateau; and
- Areas located in peat > 1.0m in depth.

- 6.16 At this stage it was considered the Site could theoretically accommodate up to 24 turbines of up to 150m in tip height. This provided a platform to identify zones of suitability and to refine the layout accordingly.

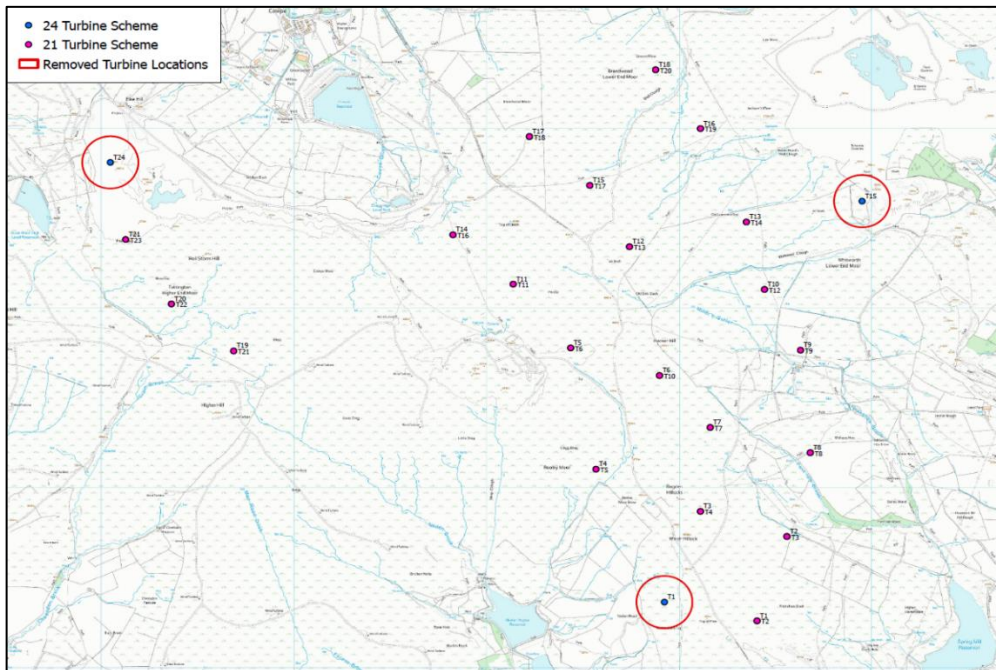
Figure 6.1: Layout Iteration 1 (24 Turbines)



Layout Iteration 2: 21 Turbines (November 2024)

6.17 As illustrated in pink in **Figure 6.2**, the second iteration comprised 21 turbines of up to 180m tip height.

Figure 6.2: Layout Iteration 2 (21 Turbines)



6.18 The decision to increase the turbine height reflects a balance between maximising renewable energy generation whilst also taking into consideration environmental effects. From an energy generation perspective, wind speed increases with height due

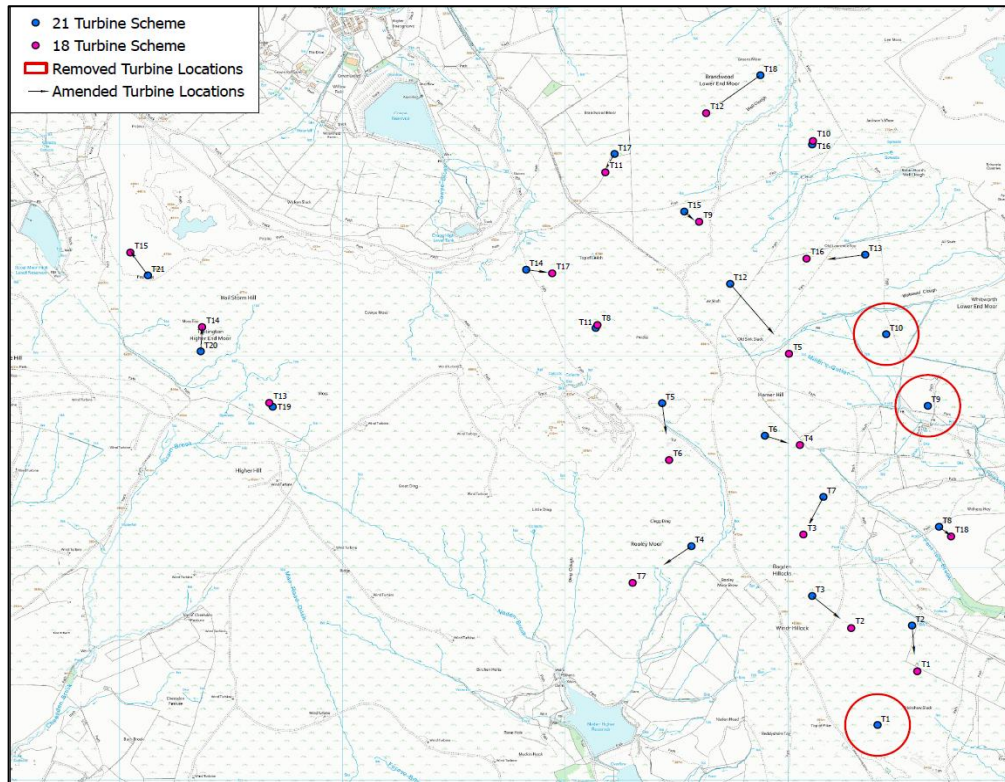
of wind shear. On moorland terrain a 180m turbine can access stronger and more consistent wind flows than a 150m turbine increasing their efficiency. The increased output of the 180m turbine also allowed the Applicant to reduce the number of turbines to achieve the same overall generation capacity. The extract above contains in blue the 24-turbines of the Initial Layout and shows the locations of the turbines that were subject to removal (Turbines 1, 15 and 24 - circled in red) as an output of this transition to a 180m tip height. Reasons for these turbines' removal are discussed in more detail below.

- 6.19 T1 (southern), T15 (eastern), and T24 (north-western) are all located on the outer edges of the Initial Layout. These areas were identified as being particularly constrained from both a landscape and visual perspective, as well as in terms of noise and vibration. Their proximity to the moorland edges made the turbines more visually prominent particularly when seen from the settled valley bottoms. There was also potential for adverse noise effects on the closest residential properties.
- 6.20 The Initial Layout would have also led to a greater level of effect on the quantity of habitats subject to removal and on the loss / degradation of peat resource than that proposed within the application.

Layout Iteration 3: 18 Turbines (March 2025)

- 6.21 As illustrated in pink in **Figure 6.3**, the third iteration comprised of 18-turbines up to 180m tip height. The extract also contains Layout Iteration 2 in blue for context and circles in red those specific turbines that were subject to removal.
- 6.22 Between the period of EIA Scoping and Public Consultation the design team received the majority of detailed further baseline studies / investigations / surveys which could inform layout. The layout also went through an extensive repositioning process which is discussed in more detail in the section below. The changes in layout are depicted by the arrows in **Figure 6.3**. Public and statutory consultation feedback on reducing the ground-based impacts was also further taken into consideration.
- 6.23 Key changes from the 21-turbine layout were the removal of Turbines 1, 9 and 10.
- 6.24 T1 was the most southerly turbine and closer to residential receptors to the south of the Site. Noise studies determined that the turbine would have increased the adverse effects at these receptors to a point that operational curtailment would need to be applied to the turbine at such a level that rendered the turbine unviable but without which there would have been an inappropriate significant environmental effect. Its location would also be visually more imposing on views from the south.
- 6.25 Turbines 9 and 10 were in the eastern most point of the layout. Initial visualisations of the Proposed Development determined that due to their location and the topography of the Site their presence would be more visually prominent to receptors from the east such as the settlement of Whitworth and its associated heritage assets (e.g. Whitworth Church of St Bartholemew (Grade II Listed Building) and views over the Whitworth Conservation Area)). Similar to above, these turbines would have also led to potentially adverse impacts (noise) on receptors to the east and to the peatland environment.

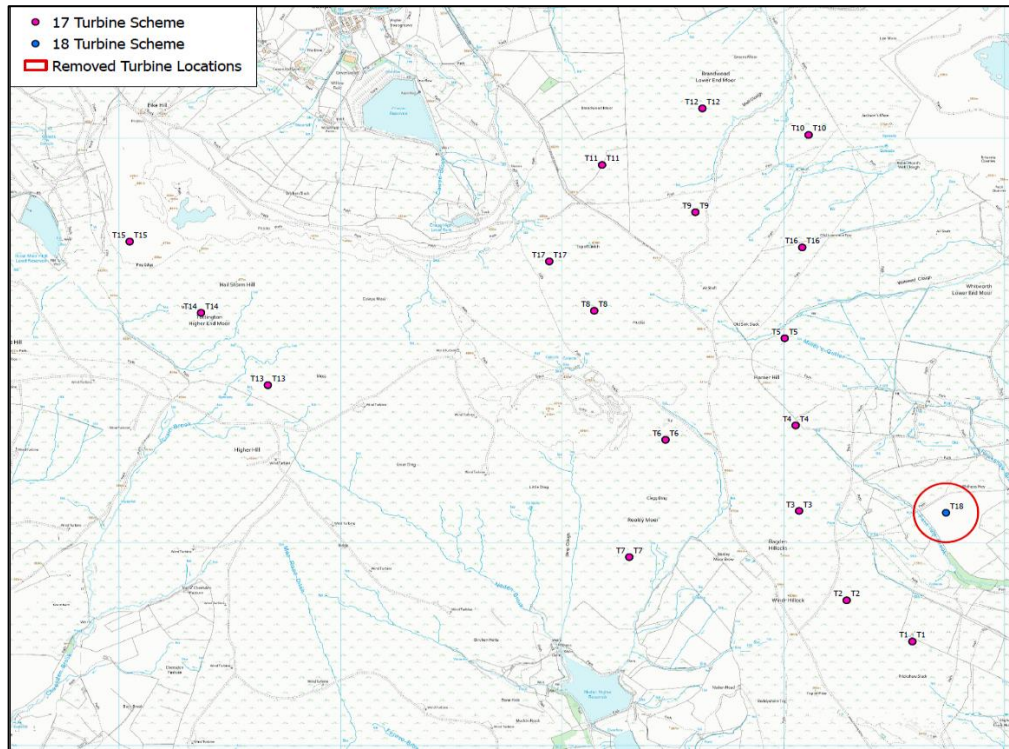
Figure 6.3: Layout Iteration 3 (18 Turbines)



Layout Iteration 4: 17 Turbines (May 2025) – the 2025 Submission

- 6.26 Through a series of further studies and the second public consultation, as shown in **Figure 6.4** the key change to the layout included the removal of ‘Turbine T18’ and associated infrastructure (i.e. access track, underground cable connection and crane pad hardstanding).
- 6.27 The turbine was removed due to the noise effects on residential receptors to the east of the Site. The turbine was also located in an area of complex topography which would have required a substantial amount of earthworks / engineering to construct requiring a greater level of peat extraction, transport movements and habitat removal.
- 6.28 The topography of this eastern portion of the Site also means that Layout 3 would be more visually prominent to receptors from the east such as the settlement of Whitworth and its associated heritage assets (e.g. Whitworth Church of St Bartholemew (Grade II Listed Building) and views over the Whitworth Conservation Area)). The removal of Turbine 18 lessened the effect of the Proposed Development on views from the east and on the heritage significance of assets to the east of the Site.

Figure 6.4: Layout Iteration 4 (17 Turbines)



Layout Iteration 5: 12 Turbines (June 2026) – FEI Submission

6.29 As part of the FEI Submission, the turbine layout has been further refined in response to consultation feedback, identified environmental constraints and engagement with turbine manufacturers (OEM) to ensure appropriate turbine spacing and a balanced design.

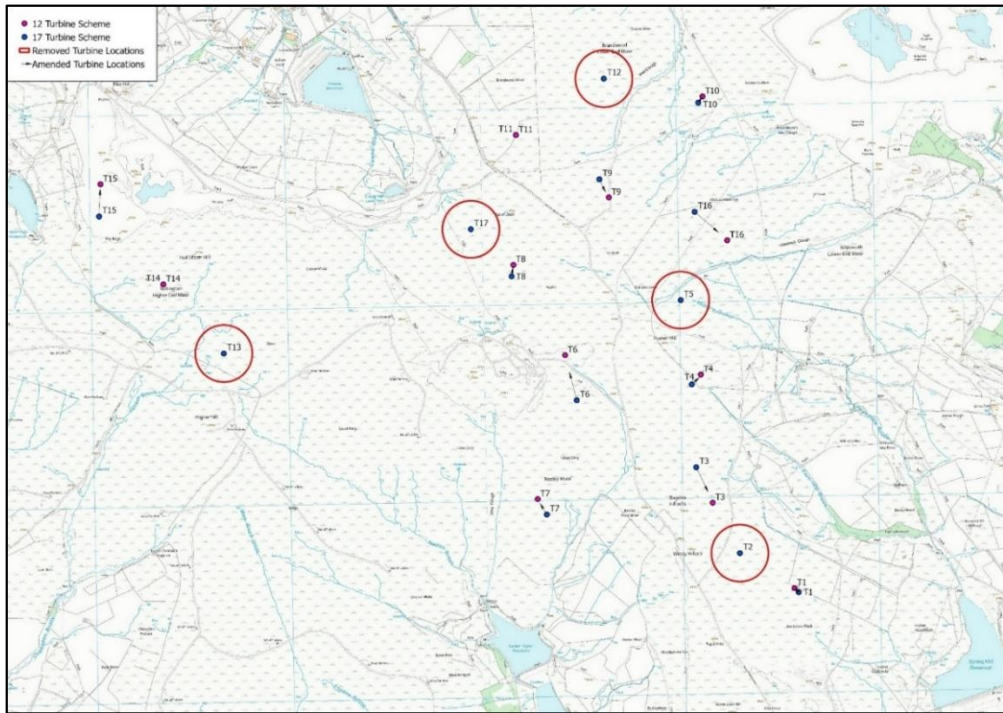
6.30 A summary of the amendments to the Proposed Development is set out below:

- Reduction in turbine numbers from ‘up to 17 turbines’ to ‘up to 12 turbines’. Turbines T2, T5, T12, T13 and T17 have been removed from the Proposed Development.
- The layout of the remaining turbines has been updated, with turbines T11 and T14 retained in their original positions as per the 2025 Submission and turbines T1, T3, T4, T6, T7, T8, T9, T10, T15 and T16 relocated within the Site to respond to environmental constraints and consultation feedback.
- The Typical Turbine Foundation Detail and Typical Crane Hardstanding Detail have been updated to reflect turbine specification advice from the supply chain.
- The Aviation Lighting Plan has been updated to reflect the revised turbine layout, with all 12no. turbines having infrared lighting and 8no. turbines (T1, T4, T7, T10, T11, T14, T15 and T16) also having a nacelle light.
- The works to the access via Scout Road, as well as the location and design of the construction laydown area, have been amended to reflect the logistics of turbine delivery in response to advice from the supply chain.

- The internal access track layout has been updated to reflect the revised turbine positions, logistics of turbine delivery in response to advice from the supply chain and to respond to consultation feedback from the Mining Remediation Authority relating to track proximity to historic mine entries and their associated zones of influence. This includes localised realignment and optimisation of track lengths and geometry.
- The Rooley Moor Road Crossing details have been updated to provide clarification on how users of the route would interact with the crossing point both during construction and operation, in response to consultation feedback.
- Revision to grid connection route options, including the removal of the previously proposed Option B route and the introduction of a new alternative western route (Options C1 and C2) to remove the section routed through Edenfield Village, in response to consultation feedback.
- The substation has been relocated 118m to the east, with further detail developed for the indicative design and layout, including refinement of the compound arrangement and associated infrastructure (with the detailed layout/design to be confirmed via planning condition).
- The Indicative Fencing Layout has been revised to align with consultation feedback (with the detailed layout/design to be confirmed via planning condition) and updates to the *Moorland Restoration and Management Plan*.
- The *Drainage Strategy* has been updated to reflect the revised infrastructure layout and to address consultation feedback.
- The *Moorland Restoration and Management Plan* (MRMP) and *Outline Habitat Management & Monitoring Plan* (OHMMP) have been updated to reflect the revised infrastructure layout, including amendments to restoration areas, and to address consultation feedback.
- The Biodiversity Net Gain proposals have been updated to reflect changes in habitat loss and enhancement areas, with a revised *BNG Calculations Report and Metric* presented – a greater than 10% BNG is still achieved.
- The *Outdoor Access Management and Enhancement Plan* (OAMEP) has been updated to reflect the revised infrastructure layout, consultation feedback, and amendments to the Common Land replacement strategy.

6.31 The comparison between the 2025 Submission and FEI Submission layouts is illustrated in **Figure 6.5**.

Figure 6.5: 2025 Submission Layout (17 Turbines – Blue) v FEI Layout (12 Turbines – Pink)



- 6.32 The repositioning of turbines has been undertaken to improve turbine spacing, respond to environmental constraints and optimise constructability. This includes localised adjustments to increase separation distances between turbines, avoid sensitive features such as watercourses, and reduce potential disturbance to peat and habitats. Refinements have also been made to facilitate construction access, including alignment with proposed access tracks and turning requirements.
- 6.33 The removal of turbines and associated infrastructure reduces the overall development footprint by 17% (52,000m² less infrastructure area), including a reduction in the extent of access tracks, crane hardstandings and associated earthworks. The FEI Submission Layout will therefore have lesser disturbance to peat and soils than the 2025 Submission. Some key statistics include:
- 51% less infrastructure located on peat over 1m depth (reduced from 31,746m² to 15,631m²).
 - 33% reduction in the average depth of peat beneath permanent hardstanding (average depth reduced from 50cm to 30cm).
 - 28% reduction in peat excavation (37,000m³ less excavation), including 30% reduction in catotelm peat excavation and 14% reduction in acrotelm peat reduction.
- 6.34 The western extent of the Site has been specifically revised in direct response to feedback from Natural England and JBA Consulting (third-party consultants to the LPAs) in respect of peatland impacts, with turbine T13 removed entirely, turbine T15 repositioned northwards out of peat and turbine T14 retained in the same position.

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 eroded areas will continue to erode and the peat bog will further decrease as is clearly evident from historical mapping. Full detail on the approach to peatland is presented in *Chapter 14 of the Environmental Statement, Volume 1*, as summarised in Chapter 13 of this PDAS.

6.35 The key drivers and justification for siting turbines in the western part of the Site are:

- It is one of the windiest parts of the Site, allowing efficient use of the available wind resource, and making this location highly suitable for onshore wind.
- Turbines T14 and T15 together would deliver c.12 MW of clean, secure electricity (based on a candidate turbine of 5.7MW).
- The revised turbine and track locations significantly reduce impacts on peatland, while retaining restoration opportunities in this location (as shown in the *Moorland Restoration & Management Plan*).
- This part of the moor is one of the most degraded and offers substantial potential for peatland restoration (as reflected in *Chapter 14 of the Environmental Statement, Volume 1*) – therefore the Proposed Development combines renewable energy generation with landscape scale peatland restoration, representing a balanced approach to energy generation, peat protection and long-term habitat recovery.

6.36 In addition, the reduction in turbine numbers and improved spacing between turbines contributes to reduced operational effects, including noise and shadow flicker effects. The removal of turbines T2, T12 and T17, which were the closest to nearby residential areas, specifically responds to consultation feedback to reduce noise, shadow flicker and residential amenity impacts. In summary, following the design changes for the FEI:

- The reduction in the number of proposed wind turbines and the redesign of the layout has resulted in lower predicted operational noise levels at the nearest noise-sensitive receptors. This has reduced the number of receptors where noise limit exceedances are predicted under worst case conditions from four to one. At the remaining location where noise limit exceedances are predicted, this is due to the close proximity of two existing small-scale turbines, and is only expected to occur for a narrow range of wind speeds and directions, and not during prevailing conditions. As a result, the requirement for mitigation (via turbine mode management) has been reduced substantially compared to the 2025 ES.
- The reduction in the number of proposed wind turbines and the redesign of the layout has resulted in lower predicted levels of shadow flicker at the nearest sensitive receptors. The number of receptors where shadow flicker effects could occur has also reduced from 31 to 27. The number of receptors where predicted worst-case theoretical shadow flicker levels exceeded 30 hours per year has

reduced from 14 to 3, and those exceeding 30 minutes per day has reduced from 14 to 7. As a result, the requirement for mitigation of shadow flicker effects (targeted turbine shutdowns) has been reduced compared to the 2025 Submission.

- 6.37 The removal and repositioning of turbines has also sought to reduce the impact on public rights of way and bridleways, including Rooley Moor Road and the Mary Townley Loop, and minimise the presence of turbines for users. In summary, the proximity of turbines to Rooley Moor Road has changed as shown in **Table 6.1**.

Table 6.1: Turbine Proximity to Rooley Moor Road (RMR)

Distance from RMR	2025 Submission	FEI Submission	Change
Within 250m	2	2	No Change
Within 300m	4	3	-25%
Within 350m	7	6	-14%
Within 400m	8	6	-25%
Within 500m	11	8	-27%

- 6.38 The FEI Submission layout has also been informed by landscape and visual, as well as the historic environment, considerations to reduce impacts as the Proposed Development was revised, including the potential to reduce the density and stacking of turbines in views and maintain appropriate buffers to key receptors. This has resulted in reduced visual impacts to the north (particularly in Cowpe and Bacup), and to east (in Whitworth). The FEI Submission layout will therefore have lesser negative effects on landscape character and visual amenity than the 2025 Submission.
- 6.39 This iteration of the layout represents a refinement of the Proposed Development which reduces environmental effects where practicable, whilst maintaining the overall viability of the Proposed Development. The FEI Submission layout represents the most suitable design identified through the iterative design process.

Ancillary Infrastructure Iteration

- 6.40 In addition to the turbine siting and layout, the design team also had regard to the sensitive design and layout of the ancillary infrastructure components of the Proposed Development in consideration of Site constraints and sensitive receptors.

Internal Access Tracks

- 6.41 Once the turbine locations were fixed in the final FEI layout, the routing of access tracks was determined seeking to balance the most efficient alignment from an engineering perspective (i.e. to minimise length, avoid steep slopes) whilst also taking into consideration several environmental constraints. Key principles of access track alignment included:

- Using existing tracks where possible to reduce the amount of material required for construction and reducing disturbance;
- Avoiding identified mining risk areas from a health and safety perspective – this has been further refined through the FEI in response to consultation comments from the Mining Remediation Authority (formerly the Coal Authority);
- Minimising the number of watercourse crossings (only 4no. are proposed);
- Minimising the number of PRow crossings to reduce disturbance to future site users during construction and operation, including only a single crossing of Rooley Moor Road to minimise disturbance; and
- Avoiding peatland areas / areas of deep peat to reduce the disturbance / excavation and the introduction of floating tracks – this has been further refined through the FEI in response to consultation comments from a number of consultees (including Natural England) whereby tracks have been aligned to minimise land take, avoid the best quality peat, avoid the deepest peat and exploit areas of actively eroding peat to allow restoration.

Substation

- 6.42 A position relatively central within the turbine array the location is considered optimal from an electrical engineering perspective. However, the topography of the location meant that the onsite substation would have formed a visually prominent position on the moorland tops that was considered less suitable from a visual impact perspective and less suitable from a landscape perspective to integrate mitigation planting.
- 6.43 Following this feedback, the onsite substation was moved to the northern portion of the Site, off the moorland tops, onto slopes part way down the moorland. This site was relatively flat and substantially screened from the slopes below it, and above it, by landform. It was also closer to the moorland fringe landscape type which would be better able to accommodate the mitigation of proposed woodland planting surrounding the substation.
- 6.44 As part of the FEI, the onsite substation has been microsituated approximately 118m to the east to reduce potential impacts on peat, whilst retaining the other aspect of the mitigation.

Borrow Pits

- 6.45 Original iterations considered utilisation of the non-active Ding Quarry as a borrow pit to serve the stone material requirements for the Proposed Development. This was not progressed due to the unacceptable effects this would have on landscape features and character.

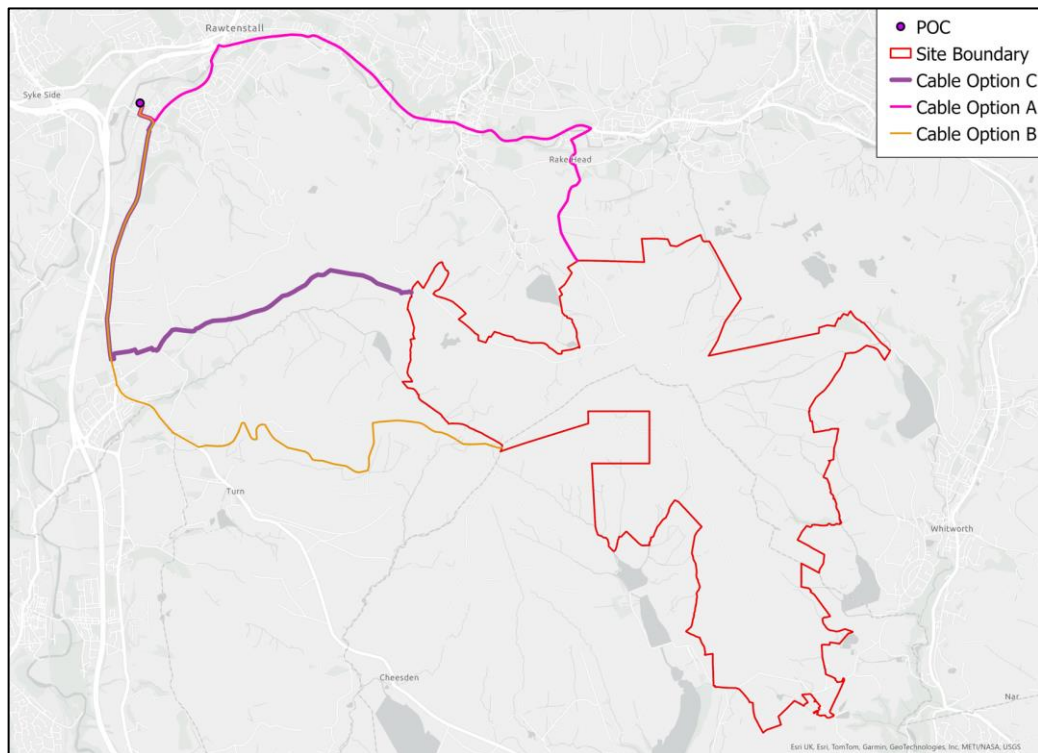
Grid Connection Routes

- 6.46 The Proposed Development includes a connection to the local electricity distribution network at the Rawtenstall Bulk Supply Point (BSP). The final alignment of the grid connection will be determined prior to the commencement of development, and therefore two options are presented for approval under this application, including:

- Grid Connection Route Option A (shown in pink in **Figure 6.6**), which extends northwards from the main parcel, following the alignment of Rooley Moor Road, connecting into Rakehead Lane and Brandwood Road, before heading westwards following the alignment of the A681 Newchurch Road / Bacup Road / Bocholt Way, terminating at the Rossendale BSP.
- Grid Connection Route Option C (shown in purple in **Figure 6.6**) extends westwards from the main parcel, following the alignment of an existing farm track connecting to the A680 Rochdale Road and heading northwards via the B6527 Market Street / Burnley Road / Moorlands View / Bury Road, terminating at the Rossendale BSP.

6.47 As part of this FEI Submission, the strategy for the proposed grid connection to the Rossendale BSP has been revised to address community concerns regarding disruption to Edenfield Village. Therefore, the previous Grid Connection Route Option B (as proposed in the 2025 Submission and shown in Orange in **Figure 6.6**) has been removed and is replaced by Route Option C.

Figure 6.6: Grid Connection Route Options



Source: Cubico

7. The Proposed Development

Overview

- 7.1 The Proposed Development comprises the construction and operation of a new onshore wind farm, comprising up to 12no. wind turbines together with associated ancillary infrastructure including access tracks, crane pads / hardstandings, onsite substation, underground 33kV electrical cabling, underground fibre cabling, a temporary construction compound and a temporary staging area, as well as an underground 132kV grid connection to the Rossendale BSP. Proposals for the restoration and management of the degraded moorland peat habitat within the Site, including new fencing, are also presented, alongside enhancements to outdoor access provision.
- 7.2 Planning permission is sought for a temporary period of 40 years, from the date of first exportation of electricity to the local electricity distribution network.
- 7.3 The existing SMWF is required to be decommissioned in July 2033, whereas the Proposed Development is likely to be decommissioned in 2070. Although the existing SMWF may be subject to a future repowering or life extension proposal, any such proposal would require separate planning permission. On the basis of the current planning permission, there could therefore be a period of approximately 37 years during which the Proposed Development remains in situ beyond the current permitted decommissioning date for the existing SMWF. The Application, therefore, seeks permission to retain some of the access tracks associated with the SMWF which it is necessary to retain beyond 2033 to enable the operation of the 12no. turbines proposed in the Applications.
- 7.4 As noted in Section 3 of this PDAS, the majority of the Site comprises Common Land and Cubico will make a separate application, pursuant to Section 16 of the Commons Act 2006, to deregister relevant parts of the common to facilitate implementation of the Proposed Development and designate replacement Common Land to ensure no overall net loss. Consent will also be obtained pursuant to Section 38 of the Commons Act 2006 for temporary works associated with construction of the Proposed Development.

Rochdale Envelope

- 7.5 It should be noted that the exact size and output of the turbines will depend on the particular model selected and this depends on a number of factors including equipment availability at the time of construction. Cubico will engage with manufacturers to acquire turbines that match the consented turbine specifications. Similarly, other aspects of the Proposed Development, including the onsite substation, access tracks, watercourse crossings, underground 33kV cabling, underground 132kV grid connection and outdoor access enhancements, will be subject to further detailed design development.

- 7.6 A ‘Rochdale Envelope’ is therefore presented within the Applications. The Rochdale Envelope is a well understood concept in infrastructure consenting and is encapsulated in the Planning Inspectorate Guidance for “Nationally Significant Infrastructure Projects – Advice Note Nine: Rochdale Envelope”⁷⁰ (“PINS Guidance”). Whilst the Proposed Development is not being promoted as an NSIP the legal principles are the same. At paragraph 1.2 the PINS Guidance says this:

“The ‘Rochdale Envelope’ approach is employed where the nature of the Proposed Development means that some details of the whole project have not been confirmed (for instance the precise dimensions of structures) when the application is submitted, and flexibility is sought to address uncertainty...”

- 7.7 Similarly, NPS EN-3 provides the following:

“Flexibility in the project details

2.12.39 In many cases, not all aspects of the proposal may have been settled in precise detail at the point of application. Such aspects may include:

- Dimensions of turbines, including hub height and rotor diameter;*
- Type, number and generating capacity of wind turbines;*
- The precise location, configuration and spacing of turbines and associated infrastructure;*
- The need and size for external cabins adjacent to the wind turbines to house transformers.*

2.12.40 Guidance on how applicants should manage flexibility is set out at Section 2.6 of this NPS and in Section 4.3 of EN-1”.

- 7.8 Therefore, provided that the final locations of the turbines and related infrastructure are within the parameters assessed, those final locations may be refined through additional plans and secured through suitable conditions after the grant of planning permission.

Grid Connection & EIA

- 7.9 In preparing the Applications, and producing the EIA, the Applicant has had due regard to the decision delivered by the Inner House of the Court of Session in *Raeshaw Farms Ltd v Scottish Ministers [2026] CSIH 10*⁷¹, which confirmed consideration should be given to whether a proposed wind farm and its associated electricity grid connection constitute a single project for the purposes of EIA.

- 7.10 As set out later in Section 7 of this *Planning, Design & Access Statement* and in *Chapter 4 (Development Specification)* of the *FEI Environmental Statement, Volume 1*, the

⁷⁰ Nationally Significant Infrastructure Projects – Advice Note Nine: Rochdale Envelope (Planning Inspectorate) (Updated 25 March 2025). Available: [Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope - GOV.UK](#)

⁷¹ Available: [2026csih10-raeshaw-farms-limited-against-scottish-ministers-and-another.pdf](#)

electricity grid connection comprises an underground 132kV electrical cable extending from the on-site substation to the Rossendale Bulk Supply Point (BSP), which is the point of connection to the local distribution network. Two route corridor options (Route Options A & C) are proposed for the alignment of the electricity grid connection.

7.11 As set out within *Chapter 2 (Approach to EIA)* of the *FEI Environmental Statement, Volume 1*:

- The electricity grid connection forms part of the 'Project for Assessment' for the purposes of the EIA. A detailed description of the electricity grid connection is presented in *Chapter 4 (Development Specification)* of the *FEI Environmental Statement, Volume 1* and the alignments of the two route corridor options (Route Options A & C) are included within the 'Assessment Boundary' (*Figure 1.1* of the *FEI Environmental Statement, Volume 1*). The Applicant would be responsible for delivering the electricity grid connection from the on-site substation up to the operational boundary of the Rossendale BSP.
- The Project for Assessment (including the electricity grid connection) is assessed within each technical topic chapter of the *FEI Environmental Statement*, informed by appropriate baseline data, with relevant levels of effect and significance reported and necessary mitigation measures identified.
- The works to connect the electricity grid connection within the operational boundary of the Rossendale BSP will be undertaken by the Distribution Network Operator (DNO) and not the Applicant. To ensure appropriate consideration of these works alongside the Project for Assessment and any 'combined environmental effects', the cumulative (in-combination) effects are reported in *Chapter 16 (Assessment of Cumulative Effects)* of the *FEI Environmental Statement, Volume 1*.

7.12 It is also important to note that the Proposed Development differs from the case in *Raeshaw*, in that the electricity grid connection route corridor options form part of the 'Proposed Development' (set out in the description of development) and the alignments of the two route corridor options (Route Options A & C) are included within the boundary of the Applications for which full planning permission is sought – in *Raeshaw* it did not. A planning condition is proposed to be applied to any grant of planning permission restricting the implementation of only one of the proposed route corridor options.

Quantum of Development per Local Authority

7.13 As previously noted, the Site crosses the administrative boundaries of Rossendale and Rochdale Councils (**Figure 7.1** and **Appendix 2**). **Table 7.1** below summarises the elements of the Proposed Development which fall within each local authority area.

Figure 7.1: Infrastructure Layout with LPA Boundary

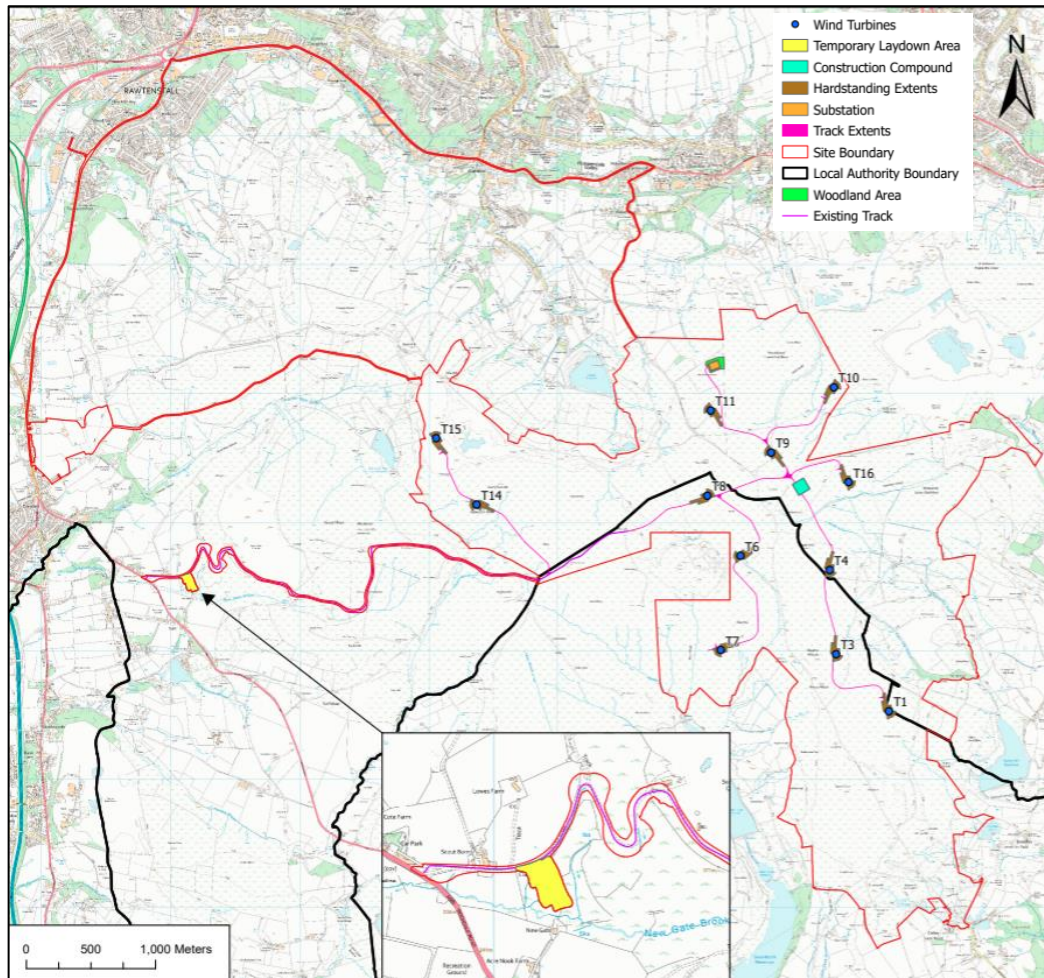


Table 7.1: Elements of Proposed Development within Rossendale and Rochdale⁷²

Elements of Proposed Development within Rossendale	Elements of Proposed Development within Rochdale
7no. turbines and associated crane pad hardstanding (T4, T9, T10, T11, T14, T15 & T16)	5no. turbines and associated crane pad hardstanding (T1, T3, T6, T7 & T8)
Part of the crane pad hardstanding for turbine T1	Part of the crane pad hardstanding for turbine T4
5.9km of new access tracks, including the Rooley Moor Road crossing, with underground 33kV electrical cabling and fibre cabling running parallel to these tracks	4.3km of new access tracks, with underground 33kV electrical cabling and fibre cabling running parallel to these tracks

⁷²

Note: The location of the 2.84km of proposed riparian planting set out in the *Biodiversity Net Gain Report* and *Outline Habitat Management & Monitoring Plan* will be confirmed via a Biodiversity Gain Plan pursuant to a planning condition

4.1km of existing SMWF access tracks, including Scout Road, with underground 33kV electrical cabling and fibre cabling running parallel to these tracks	0.8km of existing SMWF access tracks, with underground 33kV electrical cabling and fibre cabling running parallel to these tracks
Onsite Substation and associated 0.67ha woodland planting area	Grid Connection (Option C1 (1.6km)) to Rossendale BSP (underground)
Grid Connection (Options A (7.9km), C1 (9.8km) and C2 (9.6km)) to Rossendale BSP (underground)	16.93ha of 'controlled' moorland restoration
Temporary Construction Compound	113ha of 'community' moorland restoration
Temporary Construction Staging Area	Outdoor access physical enhancement works, including: • Moor Cock Inn Rest Area • Greenbooth Car Park Enhancement Works • Reinforced Vehicle Barrier to prevent unauthorised access to RMR from the South • Interpretation panels and on-site signage • CCTV cameras
99.77ha of 'controlled' moorland restoration	
115ha of 'community' moorland restoration.	
6.7km of new/improved fencing and boundary treatments	
Outdoor access physical enhancement works, including: • New Permissive Public Footpath / Bridleway Connection to RMR • Mountain Bike Trail enhancements • Reinforced Vehicle Barrier to prevent unauthorised access to RMR from the North • Interpretation panels and on-site signage • CCTV cameras	

Wind Farm Development

Wind Turbines

- 7.14 Planning permission is sought for the construction and operation of up to 12no. wind turbines⁷³. The precise design of the turbines will be confirmed via planning condition, however, planning permission is sought for turbines with a maximum height to the tip of the blade of 180m above ground level.
- 7.15 The turbines will be of conventional design, including a tower, nacelle and three blades, and will be finished in an off-white matt colour – the precise colour (RAL) can be agreed pursuant to a planning condition.
- 7.16 A *Typical Wind Turbine Detail* is submitted with the application for information only.
- 7.17 Turbine locations are shown on the *Infrastructure Layout* and co-ordinates are listed in **Table 7.2**. These coordinates are subject to a maximum of 50m micro-siting allowance for any environmental and geotechnical constraints in each location identified at construction stage (as described below) – final locations will therefore be confirmed via planning condition.

Table 7.2: Proposed wind turbine co-ordinates

Turbine no.	Easting	Northing
T1	386563	417532
T3	386153	417975
T4	386104	418629
T6	385413	418740
T7	385260	418009
T8	385156	419206
T9	385650	419541
T10	386137	420048
T11	385182	419867
T14	383369	419137
T15	383057	419653
T16	386250	419312

- 7.18 The foundation solution for the wind turbines is anticipated to comprise gravity foundations unless geotechnical studies indicate a piled (deep) foundation is more

⁷³ For ease of referencing, the turbine numbering has been retained, with those turbines removed omitted from the plans, and as such turbine numbering is not sequential.

appropriate. The typical depth of a gravity foundation is 3.5m⁷⁴, with a 25m width to the edge of the slab. A *Typical Turbine Foundation Detail* is submitted for information.

Crane Pad Hardstandings

- 7.19 At each wind turbine location, to provide a level and firm base for the cranes and other plant, hardstanding will be constructed. Hardstanding would also be used to temporarily store turbine components until they are installed.
- 7.20 Due to the size of turbines proposed as part of the Proposed Development (i.e. up to 180m to tip height), mobile cranes with an appropriate lifting capacity (typically of up to 1,000 tonnes) will be required.
- 7.21 The total crane pad area for each wind turbine, including permanent hardstanding, temporary hardstanding and clearance area, has a length of approximately 196m and a width of 93.5m at its widest point⁷⁵ with a total area of 7,093m². The majority of the crane pad will comprise a non-load bearing clearance area required for the manoeuvring of turbine components. The intrusive, load bearing components only form 2,975m² of the overall crane pad area.
- 7.22 The construction of the load bearing components of the pads will involve the stripping of the existing vegetation layer and underlying soft topsoils and then laying a suitably graded capping material of up to 0.7m to improve load bearing capacity. There will be areas of the pads which will be used temporarily and other areas for permanent use and these are indicated in *Infrastructure Layout – Construction Stage*. All areas of the crane pad will be surfaced utilising coarse aggregate.
- 7.23 The crane pads will be retained through the operation of the wind farm for use during maintenance activities (e.g. component replacement), albeit some areas will be covered over in topsoil / grassed. The working area around the crane pad will be kept free of obstructions (e.g. vegetation). These areas are indicated on the *Infrastructure Layout – Construction Stage*, *Infrastructure Layout – Operational Stage* and *Typical Crane Pad Detail*.

Onsite Substation

- 7.24 As shown in the *Infrastructure Layout*, the onsite substation will be constructed in the northern part of the Site.
- 7.25 The substation will house a substation control building, transformers to step up the voltage for connection to the grid network, an area for temporary storage during operation, car parking, standby diesel generator and an auxiliary transformer. The total substation compound will be 75m x 55m, totalling 4,125m². The control building area will be a maximum of 5.5m x 16m (175m²).
- 7.26 An *Indicative Onsite Substation Layout* and *Indicative Onsite Substation Elevation* are submitted for information, providing an indication of the potential arrangement of the compound and associated infrastructure. The maximum height of the main

⁷⁴ Depth is dependent on the depth to obtain a suitable bearing.

⁷⁵ Including 6m site track

transformer within the substation compound will be 6.7m. The substation control building would be up to 5.6m in height.

- 7.27 Full details of all components to be located within the substation area will be confirmed pursuant to condition(s) once selected as part of the equipment procurement process.
- 7.28 The substation will be secured by a high palisade security fence up to 2m in height. Secure access gates will be provided to prevent unauthorised access.
- 7.29 Outside of the areas of infrastructure, the compound will be surfaced with a layer of aggregate.
- 7.30 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 substation will be confirmed pursuant to a planning condition.
- 7.31 A woodland planting area, comprising of deciduous mixed tree planting, will also be planted around the onsite substation as shown in the *Infrastructure Layout, Indicative Onsite Substation Layout* and *Indicative Onsite Substation Elevations* – the detailed planting specification will be confirmed pursuant to a planning condition.

Underground Cabling

- 7.32 Turbines will be connected to the onsite substation via 33kV electricity cables and fibre cables⁷⁶ with each cable connecting several turbines together in a string. Earthing grid bare cable conductors will also be installed.
- 7.33 The location of the onsite cables will follow the alignment / route of the internal site tracks to reduce disturbance, which helps to minimise the extent of works and reduce the disturbance to previously undisturbed land.
- 7.34 The cables will be underground and laid from a drum attached to a suitable vehicle in trenches approximately 1.2m in depth and 2m wide that will be backfilled with layer of sand and excavated soil material. The cables will be gathered in the trench in a trefoil arrangement. The cables will be protected from mechanical damage by the backfill, separated by warning mesh. Soil / peat will then be reinstated depending on location.
- 7.35 In the vicinity of the onsite substation, the cable trench will be up to 4m wide to accommodate multiple circuits converging from the turbines. In this area, suitable separation distances between cables will be maintained, and trench dimensions will be increased.
- 7.36 At the point where the underground cabling crosses Rooley Moor Road, works will be required to facilitate underground cable installation. Given the condition of the road in this location, a trench-based installation method is anticipated. This would involve the temporary removal of the existing road surface, excavation of a cable trench,

⁷⁶ To enable the operation of the Supervisory Control and Data Acquisition (SCADA) system.

installation of the cable, and subsequent reinstatement of the road to its existing condition.

- 7.37 A *Typical Trench Detail* for the 33kV electricity cables and fibre cables is submitted for information, with the detailed design and specification to be secured via condition.
- 7.38 The cables will be subject to ongoing maintenance and management during operation.

Grid Connection

- 7.39 From the onsite substation the Proposed Development will connect to the Rossendale BSP in Rawtenstall for distribution purposes. This connection from the onsite substation to the Rossendale BSP will utilise higher voltage 132kV electricity cables. The cables will connect into the BSP where the electrical control equipment will interface with the local distribution network.
- 7.40 For the connection from the onsite substation to the Rossendale BSP there are three alternatives for the routing including:
- Grid Connection Route A, which extends northwards from the main parcel, following the alignment of Rooley Moor Road, connecting into Rakehead Lane and Brandwood Road, before heading westwards following the alignment of the A681 Newchurch Road / Bacup Road / Bocholt Way, terminating at the Rossendale BSP.
 - Grid Connection Routes C1 & C2, which extend westwards from the main parcel, following the alignment of an existing farm track connecting to the A680 Rochdale Road and heading northwards via the B6527 Market Street / Burnley Road / Moorlands View / Bury Road, terminating at the Rossendale BSP. Routes C1 & C2 relate to potential alignments within the main parcel of the Site, but merge into a single alignment when extending westward.
- 7.41 Both alternatives are identified in the *Infrastructure Layout and Cable Route Options Plan*.
- 7.42 The exact routing of this connection (A or C) is not known at this stage and will be subject to further consultation with the Local Highways Authority (LHA) and SP Electricity North West (SP ENW) but will be delivered by the Applicant. The final design and specification will be secured via condition.
- 7.43 The 132kV cables will be installed in line with SP ENW guidance to allow adoption following completion.
- 7.44 A typical trench arrangement for the installation of a 132kV cable (as per the submitted *Typical Trench Detail*) comprises several key components designed to ensure electrical performance, mechanical protection, and long-term system reliability. The trench will generally begin with a formation layer, consisting of a prepared and levelled base that provides a stable foundation for the cable system. Above this, a bedding material—typically sand or fine granular fill—is placed to cushion the cable and distribute mechanical loading. The cable or duct installation follows, with the cable circuit either installed directly within the trench or drawn through protective ducts where ground

conditions, crossings, or highway interfaces require additional protection. Surrounding the cable, a layer of thermal backfill is used to maintain the required thermal conductivity of the cable environment and ensure the cable can operate at its rated capacity. Protection measures, such as cable protection tiles or covers and clearly identifiable marker tape, are then installed to reduce the risk of accidental damage during future works. The trench is then backfilled and reinstated in accordance with relevant highway or landowner standards to ensure structural integrity, surface continuity, and compliance with statutory requirements.

- 7.45 The 132kV cables will be pulled into underground ducts laid in cable trenches approximately 0.9 to 1.2m in depth and 0.5m wide but with a 3m permanent easement width to allow access for installation and inspection / maintenance. An indicative cable trench arrangement for the 132kV cables is shown in the *Typical Trench Detail* which is submitted for information, with the detailed design and specification to be secured via condition.
- 7.46 Temporary Working Areas will be required approximately every 1 km with an indicative footprint of around 12m × 6m for cable drum storage, jointing works, plant access and material storage.
- 7.47 Cabling installation works on the public highway will likely require temporary closures / disturbances the nature of which would be agreed with RBC / RMBC prior to construction with appropriate consents and licenses sought. All such works will be short-term and temporary.
- 7.48 At the point where the grid connection crosses Rooley Moor Road, works will be required to facilitate underground cable installation. Given the condition of the road in this location, a trench-based installation method is anticipated. This would involve the temporary removal of the existing road surface, excavation of a cable trench, installation of the cable, and subsequent reinstatement of the road to its existing condition.
- 7.49 Whilst two options for the grid connection are presented within the Application only one would be implemented – this will be controlled via planning condition.

Vehicular Access

- 7.50 The Site will be accessed via Scout Road (i.e. the existing Scout Moor Quarry access from the A680), as shown in the *Infrastructure Layout*.
- 7.51 Due to the requirement for Abnormal Indivisible Loads (AIL) some sections of Scout Road will require a level of cut and fill to enable the suitable swept path for these vehicles to obtain access. This is detailed within the *Scout Moor Quarries Access Design General Arrangement* which is submitted for information, with the detailed design and specification to be secured via condition.

Onsite Access Tracks

Site Tracks

- 7.52 To enable the construction and operation of the Proposed Development approximately 15.1km of internal site tracks are required, comprising:

- The construction of approximately 9,476m of new cut track;
- The construction of approximately 752m of new floating track; and
- The upgrade of approximately 4,884m of existing track (associated with SMWF), which includes Scout Road.

7.53 The internal track layout during construction is shown in *Infrastructure Layout – Construction Stage*. A micro-siting allowance of 50m (as summarised below) has been applied from the centre line of the internal site tracks to allow for any unforeseen environmental and geotechnical constraints – final locations will therefore be confirmed via planning condition.

7.54 Where new sections of access track are required, whether cut or floating, these would have a minimum width of 4.5m with local widening at bends where necessary.

7.55 Access tracks (both cut and floating) will be retained during the operational life of the wind farm, as shown in *Infrastructure Layout – Operational Stage*, to facilitate maintenance access, with a partial reduction in the area.

New cut tracks

7.56 The construction of new cut tracks on overburden soil will involve the stripping of the existing vegetation layer and underlying soft topsoils and then laying a suitably graded capping material of up to 400mm to improve load bearing capacity. A further layer of suitably graded material would be applied where deemed necessary. A shoulder width of 0.5m will be provided on either side of the main track width.

7.57 A typical cross-section of new cut track on overburden soil is shown in the *Typical Track Detail* which is submitted for information, with the detailed design and specification to be secured via condition.

Floating tracks

7.58 Where new tracks are proposed across areas of deep peat (>1m), floating road construction techniques will be used to limit the potential for ground penetration and damage to the underlying peatland.

7.59 The construction of floating tracks will involve a layer of terram (or similar) to be laid over formation followed by a layer of a geogrid / geotextile. The geogrid / geotextile layer will be a minimum of 400mm deep. The sub-base depth will be dependent on the underlying ground conditions. A 0.7m layer of crushed stone will then be laid on top to form the track surface.

7.60 A typical cross-section of floating track is shown in the *Typical Track Detail* which is submitted for information, with the detailed design and specification to be secured via condition.

Typical existing track widening

7.61 Construction will involve the stripping of the existing vegetation layer and underlying soft topsoils and then laying a suitably graded capping material of up to 400mm to improve load bearing capacity where required to widen the existing tracks. A further

layer of suitably graded material is to be applied where deemed necessary. The existing fall will be maintained.

- 7.62 A typical cross-section of widening existing tracks is shown in the *Typical Track Detail* which is submitted for information, with the detailed design and specification to be secured via condition.

Crossings

Rooley Moor Road Crossing

- 7.63 Internal site track layout has been designed to limit vehicular crossings of Rooley Moor Road as a non-designated heritage asset and public route, with a single crossing point proposed as shown in the *Infrastructure Layout*.
- 7.64 The *Rooley Moor Road Crossing Construction & Operational Phase Detail*, *Rooley Moor Road Crossing Construction Detail* and *Rooley Moor Road Crossing Plan View* are submitted for information, with the detailed design and specification to be secured via condition.
- 7.65 During construction a layer of terram (or similar) will be laid over the existing road surface to prevent aggregate migration, followed by a geogrid with a layer of crushed stone to create the crossing surface. The historic road will be reinstated to its original form for the operational life of the wind farm, with a maintenance track junction re-graded to match the roads original levels. A stone set at the transition will also be utilised for the reinstatement.

Watercourse crossings

- 7.66 Watercourse crossings will be constructed to facilitate the creation of the onsite access track network. A total of four watercourse crossings is proposed.
- 7.67 Two types of watercourse crossings are anticipated, as follows:
- Closed pipe crossing – with a new pipe set into the watercourse bed, surrounded by concrete. Locally won compacted material will be used to back fill and landscape over the culvert up to the site track level; or
 - Bottomless arch crossing – with the installation of a bottomless pipe over the watercourse. Locally won compacted material will be used to back fill and landscape over the culvert up to the site track level.
- 7.68 Typical cross-sections of the water crossing methods are shown in the *Typical Water Crossing Methods Detail* which is submitted for information, with the detailed design and specification to be secured via condition.

Micro-Siting Allowance

- 7.69 Nature Scotland⁷⁷ provides a helpful description of micro-siting in the context of windfarms:

⁷⁷ Siting and Designing Wind Farms in the Landscape – Guidance, Version 3a (August 2017) (Nature Scotland). Available: [Appendix 1](#)

“2.32 Micro-siting is the siting of wind turbines in small incremental distances and is used at two main stages of wind farm development:

- firstly, during the design stage to ensure that turbine layout is satisfactory from key viewpoints and achieves the design objectives. It can also be used to maximise the screening benefits of landform or landcover from key viewpoints*
- secondly, during the construction phase of a project, where previously unexpected conditions are encountered on site. This may happen, for example, where a turbine needs to be located away from an area of peat that is deeper than predicted.*

2.33 ...Micro-siting is usually covered by a planning condition which limits this to 50-100m from the consented turbine location.”

- 7.70 Micro-siting is therefore the process to determine the final position of turbines and related infrastructure to reflect physical circumstances on site.
- 7.71 A micro-siting allowance of 50m is proposed to allow flexibility in the locations of the wind turbines and other infrastructure as these are subject to further engineering and design work.
- 7.72 Alongside these micro-siting allowances there are a series of identified environmental constraints which preclude the wind turbines and associated infrastructure from being located within certain areas of the micro-siting allowances where these overlap. Therefore, there are limits / controls on where turbines and other infrastructure can be located.
- 7.73 Where appropriate to the technical topic / effect being assessed, the influence of the micro-siting allowance and the environmental constraints has been considered within the *Environmental Statement*, evidencing a robust approach to the assessment of impacts and a “reasonable worst case” assessment of the effects of the final micro-siting of wind turbines and related infrastructure.

Temporary Construction Compound

- 7.74 A temporary Construction Compound will be located in the central portion of the Site, as shown in the *Infrastructure Layout* and will form the hub of construction operations.
- 7.75 The temporary Construction Compound will be surfaced with aggregate and fenced. It will extend up to 100m x 100m, totalling 10,000m² (1ha), and will comprise:
- Storage area;
 - Chemical and oil storage area;
 - Waste management area;
 - Washout and refuelling area;
 - Site security hut;

- Hardstanding and parking areas; and
 - Site offices and welfare facilities (up to 3m in height above ground level).
- 7.76 The detailed layout and composition of the Construction Compound will be confirmed by the appointed contractor and is therefore proposed to be secured via planning condition. A typical layout is shown on the *Typical Construction Compound Detail* and typical fencing is shown on the *Typical Compound Fencing Detail* – these drawings are submitted for information only, with the detailed design and specification to be secured via condition.

Temporary Construction Staging / Laydown Area

- 7.77 A temporary Construction Staging / Laydown Area will be created off Scout Road, in the western part of the Site, as shown in the *Infrastructure Layout*. This will include an area of hardstanding for laydown and is approximately 130m in length and 64m wide (at the widest point). The temporary laydown area will be surfaced with aggregate.
- 7.78 The detailed layout and composition of the Construction Staging / Laydown Area will be confirmed by the appointed contractor and is therefore proposed to be secured via planning condition.

Earthworks

- 7.79 There will be earthworks to enable access, create the construction staging areas, laydown areas and construction compound and install electrical cables / services, foundations and crane pads. Due to this, there will be areas where levels will reduce (areas of cut) and areas where levels will increase (areas of fill). The *Infrastructure Layout* shows where such infrastructure is located and therefore the areas of the Site subject to cut and fill. The maximum deviation from existing ground levels will be +9m / -10.5m. Currently, it is expected there will be an overall cut and fill balance with any excavated material retained on-site. This will also include any requirement for excavation / changes to levels to facilitate the moorland restoration works.

Operational Drainage Strategy

- 7.80 The Proposed Development includes Sustainable Drainage Systems (SuDS) to manage surface water discharge and surface water pollution on-site. The SuDS include:
- Trackside drainage – surface water drainage ditches adjacent to access tracks that will include permanent check dams (to reduce velocity, slow sediment transport and prevent channel scour) and relief drains crossing the tracks longitudinally to prevent surcharging. These trackside drains will be drained to the existing drainage sub-catchments across the site at a controlled rate to ensure no increase in flows; and
 - Attenuation basins – Attenuation features will be located adjacent to and downslope of each turbine hardstanding area, substation and compound, with runoff shedding overland into the basin/swale features. These will be vegetated basins will allow any exceedance flows to overtop and shed back into the surrounding downslope, thus maintaining existing overland flow routes within each sub-catchment. These flows eventually route into the watercourses within and adjacent to the site.

- The features are designed to accommodate the 1 in 30 year event, with a conservative estimate of all flows from the temporary and permanent working areas contributing. The attenuation basin is designed to drain down in a controlled manner following rainfall events, ensuring that stored surface water is gradually released rather than discharged rapidly. Water collected within the basin will be conveyed via a piped outfall system, which directs flows safely to a nearby watercourse. To prevent downstream flooding and maintain greenfield runoff conditions, a flow control structure will be installed at the outlet, restricting discharge to the agreed greenfield runoff rate. This controlled release mimics natural drainage patterns, reducing peak flows and supporting sustainable water management within the site.
- Where new infrastructure or hardstanding is proposed on site, existing overland flow paths may be severed, preventing the surface water from its natural flow through the catchment. To maintain these flow paths, interception drains should be included on the upslope side of any hardstanding to capture the clean runoff and route it around to the downslope side. This can be by means of swale or drainage ditch, which is then piped to the downslope side and released in a controlled way, such as unlined filter drain or swale

- 7.81 The proposed strategy has been designed to accommodate a return period of up to 1 in 100 years, plus a 45% uplift allowance for climate change. A climate change allowance has been taken as the design value as the upper end allowance for the 2050s epoch.
- 7.82 Attenuation features and trackside drainage have been designed to accommodate the 1 in 30 year event, with any exceedance flows being retained on-site and routed overland and into the surrounding ground. Discharge rates will be limited to the equivalent greenfield runoff rates.
- 7.83 A detailed drainage scheme, in accordance with the *Drainage Strategy*, will be secured via planning condition.

Operational Phase External Lighting Strategy

Aviation Lighting

- 7.84 The *Aviation Lighting Scheme* has been agreed with the CAA.
- 7.85 Both visible and infrared lights will be attached to the wind turbines to make them visible to aircraft operating in the vicinity of the Site to support aviation safety considering the needs of civil, military, commercial and general aviation.
- 7.86 Infrared lights will be installed on all wind turbines to meet Ministry of Defence aviation safety requirements.
- 7.87 Visible lights will comprise of a static red light. The number of visible lights will be minimised to avoid visual impacts at night while still meeting UK Civil Aviation Authority (CAA) requirements. The number of turbines with visible lights has been agreed with the CAA and include 8no. turbines (T1, T4, T7, T10, T11, T14, T15 and T16). The visible lights will be operated by a suitable control device such as that the lights are

only turned on at 'night' which the CAA defines as 30 minutes before sunset to 30 minutes after sunrise. Automatic dimming will also be used, in line with CAA policy, to reduce light intensity to 10% of the peak intensity when visibility in all directions is greater than 5km.

Substation Lighting

7.88 Regular maintenance would be scheduled for daylight hours, but there will be a requirement for operational lighting for emergency works during hours of low light/darkness. Therefore, the substation will incorporate a minimal and controlled lighting strategy to meet operational and security requirements while limiting effects on the surrounding environment. It will comprise:

- Passive infrared (PIR) sensor-controlled security lighting, activated only in response to movement and remaining unlit under normal conditions;
- Operational lighting, used only during periods of low light where essential maintenance or emergency works are required, and limited to infrequent and short-duration use; and
- External lighting designed in accordance with dark sky principles, including the use of directional, downward-facing luminaires, low-intensity lighting, and the avoidance of unnecessary or continuous illumination. Lighting will be directed away from sensitive ecological features, including watercourses.

7.89 Detailed lighting design will be secured through a planning condition.

Moorland Restoration & Management Plan

7.90 An integral part of the Proposed Development are proposals for the restoration of 344.5ha of severely degraded moorland habitat to the benefit of carbon sequestration, biodiversity, water quality and reduced flood risk.

7.91 The proposals are presented within a *Moorland Restoration and Management Plan* (MRMP) which is submitted as part of the Application.

7.92 As bog and mire habitats are considered 'irreplaceable' habitats in terms of Statutory Biodiversity Net Gain (BNG), impacts to these habitats cannot be considered as part of the BNG calculations and must be dealt with separately, in a bespoke way. Therefore, enhancements set out in the MRMP are only focused only on the moorland habitats and are considered separate to the 10% BNG requirement.

7.93 The MRMP presents a restoration strategy comprised of two elements:

- Controlled Restoration: whereby 116.7ha of peatland would be enclosed with stock proof fencing (to exclude grazing and vehicles for a period of c.8-10 years) and subjected to physical restoration works, including:
 - Flailing, bunding and plug planting;
 - Drain blocking;

- Gully reprofiling;
 - Patch repair;
 - Bog recreation; and
 - Plug planting and spot turving.
- Community Restoration: whereby 228ha of less degraded peatland which is designated Common Land will be managed and restored using cutting schedules and stock rotation in collaboration with relevant Common Land rights holders. The objective will be to reduce the dominance of purple moor grass to allow other species to grow and this will be achieved through annual flailing and possibly wind rowing outside the bird nesting season.
- 7.94 The restoration techniques presented within the MRMP comprise tried and tested methods deployed in other peatland restoration projects in the UK. In accordance with NatureScot guidance⁷⁸ for developments on peatland, 10 hectares of peatland will be restored for every 1 hectare directly impacted by physical development works.
- 7.95 The objectives include to enhance the restoration areas from their existing ‘poor’ or ‘degraded’ condition to ‘good’.
- 7.96 The MRMP provides details of how the appointed Ecological Clerk of Works (ECOW) would prepare a technical report at the end of each year in which restoration works take place and for the first five years following implementation of the works to assess the effectiveness of the works undertaken, setting out the success or otherwise of works undertaken and where necessary identify the need for remedial work or refinement of the plan for subsequent years. If remedial works are identified as being required there would be a requirement for further survey and reporting until successful implementation of works is confirmed.
- 7.97 Under the terms of the *draft Section 106 Agreement*, the technical reports and surveys would be submitted to the Local Planning Authorities for approval, as well as to a Habitat Management Group (HMG) who would provide independent recommendations to the LPA’s on the validity of the reporting. Membership of the HMG would be a matter for discussion during determination of the Application. Cubico anticipates the group including representatives of Greater Manchester Ecological Unit, Natural England and other stakeholders considered appropriate along with a representative of the company. Funding for the restoration works along with funding of the activities of the HMG (if required) would be provided by Cubico or any successor in title.
- 7.98 It is proposed that the commitments presented within the MRMP be secured by legal (Section 106) Agreement between Cubico and relevant parties. A *draft Section 106 Agreement* has been provided as part of the FEI Submission.

⁷⁸ NatureScot (November 2023) *Advising on peatland, carbon-rich soils and priority peatland habitats in development management*. Available: [Advising on peatland, carbon-rich soils and priority peatland habitats in development management | NatureScot](#)

Outline Habitat Management & Monitoring Plan

- 7.99 In addition to the moorland restoration component, the Proposed Development also comprises a series of other enhancement, management and monitoring measures associated with compensating for the loss of 'non-irreplaceable' habitats and fauna.
- 7.100 An *Outline Habitat Management & Monitoring Plan* ('Outline HMMP') is submitted with the Application and will remain iterative throughout the construction and operational phases of the Proposed Development to reflect ongoing monitoring undertaken by the Applicant and reported to the HMG – this will be secured via legal (Section 106) Agreement.
- 7.101 The Outline HMMP sets out the following enhancement measures:
- Creation of 49.49ha of acid grassland across the northern portion of the Site (within Rossendale), targeting 'good' habitat condition.
 - Creation of 0.67ha of other mixed woodland, adjacent to the proposed on-site substation to provide screening (within Rossendale).
 - Creation of 2.84km of scrub, shrub and tree planting within marginal riparian habitat, the location of which is to be confirmed pursuant to a planning condition.
 - Habitat enhancement measures for bats and birds through the installation of bat and bird boxes – the location and specification of which will be confirmed via planning condition.
 - Habitat enhancement measures for herpetofauna through the provision of hibernacula – the location and specification of which will be confirmed via planning condition.
- 7.102 The Outline HMMP also sets out measures for monitoring the effective implementation of the above enhancements and wider ecological monitoring throughout the construction and operational phase of the Proposed Development, including feedback to the proposed HMG.
- 7.103 A detailed HMMP will be secured via legal (Section 106) Agreement.

Outline Peat Management Plan

- 7.104 An *Outline Peat Management Plan* ('OPMP') is submitted with the Application (*Volume 2, Appendix 14.3 of the Environmental Statement*). It provides the framework for the preparation and implementation of a detailed Peat Management Plan ('PMP') by a specialist peat restoration contractor to work alongside the appointed Principal Contractor ('PC') prior to commencement of construction. The detailed PMP will be secured via planning condition and will be developed in consultation with key stakeholders including Natural England, the Environment Agency and the Councils. This will include additional site investigations to be carried out prior to construction and to reflect any proposed micro-siting of infrastructure. Once the PMP has been approved,

the specialist peat restoration contractor alongside the PC will be responsible for implementing it.

- 7.105 This OPMP addresses the management of peat during the construction period for the Proposed Development, as well as site restoration both during and following construction.
- 7.106 The OPMP sets out how, in line with national environmental policy and best practice guidance, the Proposed Development has applied the mitigation hierarchy – Avoid, Minimise, Restore, and Compensate/Offset – to manage potential impacts on peatlands and carbon-rich soils, seeking to reuse as much peat as possible. These principles are embedded in guidance from the UK Peatland Strategy and IUCN UK Peatland Programme guidance⁷⁹, NatureScot⁸⁰, Natural England⁸¹, the Environment Agency⁸², and the England Peat Action Plan⁸³.
- 7.107 The OPMP confirms that the majority of infrastructure would be sited on peat of low – medium sensitivity⁸⁴, with only limited works on peat of high sensitivity⁸⁵. To facilitate construction of the Proposed Development, approximately 96,674m³ of peat would be excavated, however, following the application of the peat reuse and restoration measures set out in the OPMP and MRMP 97,537m³ of peat would be reused/restored, resulting in a peat balance of 863m³ being achieved.

Common Land

- 7.108 As part of the Proposed Development, a small area of Common Land (the ‘Release Land’) will be removed from registration to allow for infrastructure such as turbine foundations and access tracks. However, this will be fully offset by the addition of adjacent ‘Replacement Land’ of equal or greater size and quality, ensuring that the total area of Common Land is maintained or increased. In addition, a Section 106 Agreement will regrant public access rights over new tracks and operational areas, resulting in an overall net gain in land available for both public access and grazing.
- 7.109 The process and extent of these changes are shown below on **Figure 7.2**, which details:

⁷⁹ IUCN UK Peatland Programme (2018). UK Peatland Strategy 2018–2040. Available at: <https://www.iucn-uk-peatlandprogramme.org/resources/uk-peatland-strategy-2018-2040>

IUCN UK Peatland Programme. Peatland Restoration. Available at: <https://www.iucn-uk-peatlandprogramme.org/peatland-restoration>

⁸⁰ NatureScot (2023). Advising on peatland, carbon-rich soils and priority peatland habitats in development management. Available at: <https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management>

⁸¹ Forestry Commission, Forest Research, and Natural England (2021). *Decision Support Framework for Peatland Protection and the Establishment of Woodland*. Available at: <https://www.gov.uk/government/publications/decision-support-framework-for-peatland-protection-the-establishment-of-new-woodland-and-re-establishment-of-existing-woodland-on-peatland-in-england>

⁸² Environment Agency (2004). *Guidance on the Management of Peat Soils and the Use of Peat in Construction*. Science Report SC030136.

⁸³ DEFRA (2021). *England Peat Action Plan*. Available at: <https://www.gov.uk/government/publications/england-peat-action-plan>

⁸⁴ The sensitivity of the peat is determined by both the depth and the condition of the peat, as heavily eroded, drained or afforested peat has little carbon within the upper layer and therefore the sensitivity of the peat is considered to be lower.

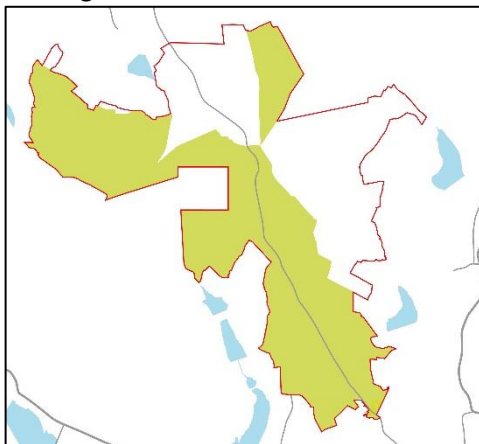
⁸⁵ Temporary Hardstanding and Earthworks associated with T6.

- The Release Land – Cubico will apply to deregister the areas of Common Land required for infrastructure (ie. turbine foundations and access tracks), both temporary and permanent.
- The Replacement Land – to compensate, Cubico will provide like-for-like replacement land adjacent to the existing common, ensuring continued availability for grazing and public access. The replacement land will be greater in size and quality than the land removed.
- Regrant of Access Rights – once the wind farm is complete, Cubico will regrant rights over the access tracks, hardstandings and temporary construction areas under a Section 106 Agreement, allowing the public to use them as if they were Common Land. This will result in a net increase in land available for grazing and public access

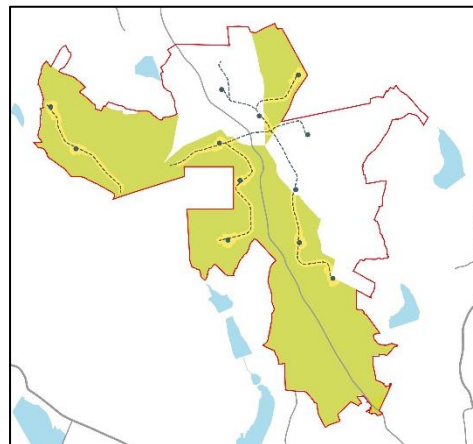
7.110 This approach ensures that public access and commoners' rights are protected and enhanced, supporting both recreation and traditional land management while enabling the delivery of a nationally significant renewable energy project.

Figure 7.2: Common Land Works

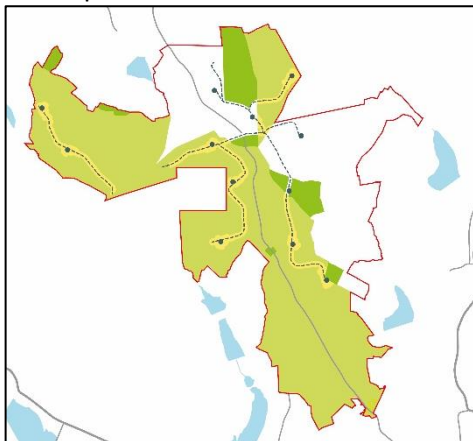
Existing Common:



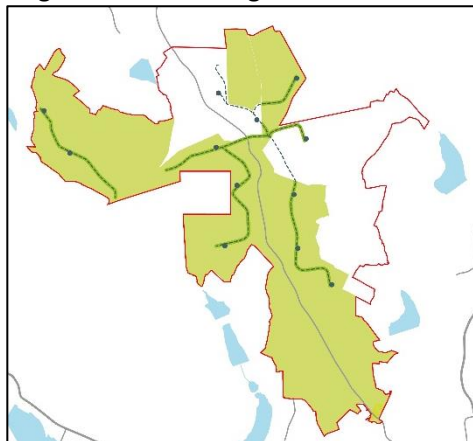
The Release Land:



The Replacement Land:



Regrant of Access Rights:





Fencing & Boundary Treatments

- 7.111 The *Proposed Indicative Fencing Layout with Access Point Locations* sets out the proposed location of new stockproof fencing, as well as field gates, to be installed as part of the Proposed Development. The new fencing is required to support the moorland restoration measures presented in the MRMP (summarised above), whilst maintaining public access across the Site. It is intended that the final location and detailed specification of the fencing and gates will be submitted and approved pursuant to a planning condition.
- 7.112 Present efforts to control vehicular access to Rooley Moor Road include an existing vehicle barrier to the south, which is currently in a poor state of repair, and a gate to the north. As set out in the *Outdoor Access Management & Enhancement Plan*, the Applicant commits to repairing, and thereafter maintaining, these gates/barriers during the construction and operational phases of the Proposed Development, as part of their contribution to supporting efforts to control illegal off-roading. This will also form part of the construction traffic management strategy which includes a commitment not to use Rooley Moor Road other than the identified crossing point. The detailed specification of any repair works and future maintenance regime for these features will be submitted and approved pursuant to a planning condition.

Outdoor Access Management & Enhancement

- 7.113 An *Outdoor Access Management & Enhancement Plan* (OAMEP) is submitted with the Application, which explains how public access will be protected and managed during construction of the Proposed Development and outlines measures to enhance access and recreational opportunities during operation. It establishes a clear and proactive framework to:
- Protect public rights of way ('PRoW'), common land, and Countryside and Rights of Way ('CRoW') Act Access Land throughout construction and operation.
 - Safeguard open access rights while minimising disruption to recreational users and ensuring safe, continuous access.
 - Enhance public access infrastructure, including new and upgraded trails, improved wayfinding, and visitor facilities.

- Implement measures to deter illegal off-roading, protect the landscape, and promote responsible access.
- Provide a long-term strategy for monitoring, management, and enforcement to maintain and improve public access.

7.114 The OAMEP sets out lasting improvements to outdoor access and recreation, including:

- Opening approximately 10.2km of new windfarm access tracks, plus retaining approximately 4.8km of existing tracks through SMWF, creating a network of 15.1km of tracks accessible to walkers, cyclists, and horse riders.
- Increasing publicly accessible land by providing replacement Common Land and regranting access rights over the areas of Common Land removed to facilitate the Proposed Development, offering additional space for recreation and wildlife appreciation.
- Upgrading key infrastructure, such as car parks, and providing new directional signage, interpretation materials and amenity areas.
- Creating new circular recreational routes to provide more opportunities for outdoor exploration.
- Strengthening connections between Lee Quarry and Cragg Quarry mountain bike facilities via the wind farm access tracks, improving mountain biking and multi-use access across the wider area.
- Reducing illegal off-roading through targeted deterrents and enforcement partnerships, protecting the landscape.
- Investing in long-term site management to ensure ongoing maintenance and community engagement.

7.115 The OAMEP follows the five-step methodology established by NatureScot's Outdoor Access Plan Guide⁸⁶, which provides best-practice principles for outdoor access planning for wind farms.

Construction Phase Access Management

7.116 The OAMEP establishes a framework for the maintenance and management of public access during the construction of the Proposed Development, prioritising public safety, minimising disruption, and protecting the recreational value of Scout Moor and Rooley Moor. It identifies potential impacts on recreational routes – such as bridleways, footpaths, and areas of open access land – and sets out mitigation measures, including temporary closures and controlled crossings.

⁸⁶ A Brief Guide to Preparing an Outdoor Access Plan (NatureScot, formerly Scottish Natural Heritage, February 2010). Available: [Microsoft Word - A409251.doc](#)

7.117 This will inform the preparation of a Path Management Plan, to be secured via planning condition, which will be prepared by the appointed contractor and set out a detailed strategy for access management. It will:

- Identify all crossing points and how each will be managed;
- Set out how works will be phased to avoid overlapping closures;
- Define signage, diversion routes, and crossing control measures;
- Include a communications plan to keep local communities and user groups informed; and
- Be reviewed and updated as work progresses, based on site conditions and feedback.

Operational Phase Access & Recreation Enhancements

7.118 The operational phase of the Scout Moor II Wind Farm presents a unique opportunity to deliver lasting improvements to access, recreation, and landscape stewardship across the moor. The OAMEP sets out a programme of targeted interventions that respond directly to issues raised through public consultation, as well as long-standing access challenges onsite.

7.119 In summary, the following ‘key moves’ are proposed:

Key Move 1: Multi-User Access Tracks

7.120 As part of the Proposed Development, a new network of purpose-built access tracks will be constructed to service the turbine locations, alongside the retention of existing access tracks from SMWF. Once construction is complete, these tracks – totalling approximately c.15.1km – will be opened for public, multi-user access. With a compacted stone surface and designed to accommodate maintenance vehicles, the tracks will also be suitable for walkers, cyclists, and horse riders throughout the year.

Key Move 2: New Permissive Public Footpath / Bridleway Connection

7.121 A new multi-user permissive path – suitable for walkers, cyclists, and horse riders – will be created to link Rooley Moor Road with the northern access track near the onsite substation. This route will offer a more accessible alternative to the steep northern section of Rooley Moor Road, with a gentler gradient and improved surface. The entrance will include a gate or barrier designed to enable reasonable access for legitimate users while helping to prevent illegal off-road vehicle use.

Key Move 3: Moorland Stewardship and Local Partnership Role

7.122 As part of the moorland restoration strategy, a structured programme of stewardship works will be developed and delivered in close partnership with local commoners and land managers. This will include the maintenance of fences, stiles, gates, and dry stone walls, as well as support for responsible access and habitat restoration.

7.123 Alongside this, there is potential to explore a local countryside warden scheme modelled on successful approaches such as the National Trust’s Ranger programme at

Holcombe Moor. The scheme would prioritise practical maintenance, user engagement, and the day-to-day coordination of activities on the moor.

Key Move 4: Contribution to Tackling Illegal Off-Roading

7.124 A coordinated package of measures to reduce illegal off-road vehicle use and safeguard the moor for legitimate users. The proposed approach blends physical prevention, community education, and targeted partnership support – recognising that tackling this issue long-term will require both visible infrastructure and joined-up working.

7.125 The strategy focuses on three main areas:

A) Physical Prevention

- Installation of targeted barriers, such as fencing and maintained gates at vulnerable access points. The indicative fencing locations are shown on the *Proposed Indicative Fencing Layout with Access Point Locations* drawing.
- There is potential to use CCTV cameras, focused on key access points, to help deter unauthorised access and support responsible site use. Any use of cameras would be clearly signposted and carefully considered to respect privacy concerns. Footage could, where appropriate, be shared with the police to assist with enforcement in known high-risk areas.
- Access controls (such as gates, stiles and vehicle barriers) built into the design of new permissive paths and infrastructure.
- Ensuring that gates and fences are well maintained, such as the gates onto Rooley Moor Road.

B) Education and Positive Influence

- Awareness campaigns through in-person events on the moor, social media and local press to promote understanding and direct users to legal riding locations
- Educational engagement including school visits, youth outreach, and guided walks.

C) Partnership Support and Coordination

- Close collaboration with Greater Manchester Police, Lancashire Police, landowners, United Utilities, commoners, and community groups.
- Local groups will have the opportunity to access funding through the Community Wealth Fund to support grassroots deterrent measures and develop additional initiatives that promote responsible site use.
- Supporting a unified approach between both Greater Manchester Police and Lancashire Police to ensure intelligence-sharing and consistent response.

- This approach builds on existing initiatives (such as Operation Dragster) and aims to increase local capacity, create better links between stakeholders, and equip communities with the tools and resources they need for lasting impact.

Key Move 5: Improved Cycling Links Between Cragg and Lee Quarries

- 7.126 There is an opportunity to upgrade sections of the existing formal route between Cragg and Lee Quarries—improving surfacing, signage, and wayfinding to create a safer and more enjoyable experience for cyclists. The scheme will also provide new connections into the wider network of existing and proposed wind farm access tracks, helping to establish a broader network of circular and longer-distance gravel bike routes across the moor.

Key Move 6: Greenbooth Reservoir Car Park Strategy

- 7.127 A new car park strategy is proposed at Greenbooth Reservoir, focused on improving safety, protecting the environment, and creating a more welcoming gateway for visitors. The approach will balance formalised parking provision with clear signage, behavioural messaging, and improved wayfinding.

Key Move 7: Interpretation and Learning Infrastructure

- 7.128 The centrepiece of Cubico’s proposed interpretation strategy will be the creation of the Moor Cock Inn Rest Area on Rooley Moor Road – a historically significant site where an 18th-century public house once stood, serving quarry workers, sheep farmers, and travellers. Although the inn itself was demolished, two remaining stone pillars stand as a powerful visual reminder of the area’s industrial and social past. This location presents a unique opportunity to create a small, informal natural rest area that supports a wide range of moorland users – including walkers, cyclists, horse riders, and local visitors. Thoughtfully designed to sit comfortably within the landscape, the rest area will avoid any formal or intrusive infrastructure while offering simple, practical amenities and a moment of pause.
- 7.129 Alongside this, there will be a broader programme of interpretation and learning infrastructure across the moor—designed to bring the landscape to life and spark curiosity in visitors of all ages. This will include:
- A central feature of this will be a dedicated learning turbine - a turbine within the wind farm that will act as a hands-on learning hub for schools, youth groups, and community organisations. With safe viewing areas, interpretation board, interactive content via a smart phone app, and possibility for guided activities, the turbine will offer a unique opportunity for visitors to learn how renewable energy works, how turbines are constructed and maintained, and the vital role wind power plays in tackling climate change. This will allow visitors to get up close to large-scale infrastructure in a way that is rarely possible - making clean energy real, relatable, and exciting.
 - Interpretation panels exploring the industrial heritage of Cragg Quarry, including its role in shaping the local economy and landscape, and its connections to the wider moorland story.

- On-site signage and digital resources that highlight key features of the moor's ecology, moorland restoration efforts, evolving land use, and the growing network of access routes.
- Opportunities for schools and community groups to co-design content, ensuring it reflects local priorities and inspires future generations.

Construction Phase

7.130 Site preparation is anticipated to commence in 2028, with completion and operation of the Proposed Development in 2030. Therefore, the main construction programme will be approximately two years.

7.131 The period would consist of the following principal operations:

- Mobilisation to site
- Construction of temporary construction compound and site office facilities
- Upgrade to existing access track (if required) to facilitate construction traffic
- Construction of new site access tracks to turbine locations
- Construction of turbine foundations and hardstandings
- Erection of onsite substation building
- Excavation and laying of on-site cabling, connection turbines and substation building
- Erection of the turbines
- Commissioning and testing of turbines
- Reinstatement works, and
- Demobilisation from the site.

7.132 A Construction Method Statement (CEMP) will be produced prior to commencement of any development pursuant to a planning condition.

Operation and Maintenance

7.133 The wind farm will have an operational life of 40 years following first exportation of electricity to the national grid and will therefore likely be decommissioned in 2070.

7.134 The Proposed Development would be unmanned, with its performance automatically monitored from a central control room. It is anticipated that service crews would visit the site twice a year to undertake maintenance checks, whilst more regular visual inspections will take place on a monthly basis.

- 7.135 However, the Proposed Development would lead to the requirement for dedicated personnel (approximately four) to manage, monitor and maintain the wind farm infrastructure. This will include staff to monitor operational activities, complete routine maintenance and servicing on each turbine at regular intervals; periodic oil changes (e.g. gear oil), blade inspections and any other necessary maintenance works following any unexpected events (e.g. gearbox failure).

Decommissioning

- 7.136 The Proposed Development is expected to operate for 40 years, after which time decommissioning would take place.
- 7.137 Decommissioning works are anticipated to include:
- Dismantling and removal of wind turbines;
 - Demolition and removal of the substation control and ops building;
 - Dismantling and removal of electrical infrastructure, such as switchgear and transformers;
 - Removal of hardstanding, concrete bases / foundations and access tracks up to 1.5m below ground level and covered with topsoil.
- 7.138 Where features are removed, the land will be reinstated to its original baseline conditions in so far as is possible. An *Indicative Decommissioning Plan* is submitted for information.
- 7.139 A full Decommissioning & Restoration Strategy, Decommissioning Environmental Management Plan (DEMP) and Decommissioning Waste Management Strategy for the wind farm and site restoration will be prepared and submitted to RBC / RMBC prior to such works commencing, pursuant to a planning condition.
- 7.140 An updated Outdoor Access Management Plan would also be prepared and submitted pursuant to a planning condition.

8. Decision Making Framework

- 8.1 Section 70(2) of the Town and Country Planning Act 1990 requires that, in determining planning applications, regard must be had to the provisions of the development plan, so far as material to the Application, and to any other material considerations.
- 8.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that *“if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise”*.
- 8.3 It is necessary therefore to test the Proposed Development against the relevant Development Plan policies identified in the following sections of this PDAS and having regard to all other relevant material considerations.
- 8.4 The NPPF reiterates the primacy of the Development Plan (Chapter 1, paragraph 3) in decision-taking and adds that the national decision-making policies in the NPPF are a material consideration in making decisions and should be read alongside the policies in the Development Plan. NPPF Policy S3 confirms that planning decisions must apply a ‘presumption in favour of sustainable development’, which in the context of the Proposed Development means:
- Outside settlements applying NPPF Policy S5; and
 - In all locations, development proposals that accord with both an up-to-date Development Plan and the decision-making policies in the NPPF should be approved without delay.
- 8.5 On this basis the key issues to determine in consideration of this Application are whether:
- The Proposed Development is in accordance with relevant policies of the adopted Development Plan, and if there are any other material considerations that should be taken into account in the planning balance, including the national decision-making policies of the NPPF – see **Section 9: Planning Policy Context, Section 10: Contribution to Energy Security and Tackling Climate Change, Section 11: Wind Turbine Development, Section 12: Economic & Social Benefits, Section 13: Design, Environment & Amenity and Section 14: Green Belt**; and
 - The Proposed Development will result in significant or demonstrable harm that outweigh the benefits of the proposal – see **Section 14: Green Belt and Section 15: Planning Balance & Conclusions**.
- 8.6 The following sections of this PDAS address each of these issues in turn.

9. Planning Policy Context

- 9.1 In line with Section 38A of the Town and Country Planning Act 1990, the Application should be determined in accordance with the adopted Development Plan(s), unless material considerations indicate otherwise.
- 9.2 This section of the PDAS identifies the key national, regional and local planning policy tests against which the merits of the Proposed Scheme must be appraised, including those set out in the adopted Development Plans for Rossendale and Rochdale.
- 9.3 A schedule of all relevant policies is set out at **Appendix 1**. The following represents a summary and draws out the key considerations from the strategic and site-specific planning policies.

The Development Plan

- 9.4 Within Rossendale, the adopted Development Plan comprises:
- Rossendale Local Plan 2019 to 2036 (December 2021) ('Rossendale LP').
 - Edenfield Neighbourhood Plan (April 2025) ('Edenfield NP')⁸⁷.
 - Joint Lancashire Mineral and Waste Core Strategy (March 2009) ('Lancashire Minerals & Waste CS').
 - Joint Lancashire Minerals & Waste Site Allocations and Development Management Plan (September 2013) ('Lancashire Minerals & Waste SADMP').
- 9.5 Within Rochdale, the adopted Development Plan comprises:
- Places for Everyone Joint Development Plan (March 2024) ('PfE').
 - Rochdale Core Strategy (October 2016) ('Rochdale CS')⁸⁸.
 - 'Saved' policies from Rochdale Unitary Development Plan Review 2001-2016 (June 2006) ('Rochdale UDP').
 - Greater Manchester Joint Waste Development Plan (April 2012) ('GM Waste Plan').
 - Greater Manchester Joint Minerals Development Plan (April 2013) ('GM Minerals Plan').

⁸⁷ The Edenfield NP is of relevance only in respect of Grid Connection Route B.

⁸⁸ PfE Appendix A Table A.5 sets out the policies of the Rochdale CS and Rochdale UDP which have been superseded following adoption of PfE and are therefore no longer relevant.

Vision and Strategic Objectives

Rossendale Local Plan

- 9.6 The Rossendale LP sets out the Vision which envisages that the Borough will be a place where people want to live, visit, work and invest. Rossendale's distinctive landscapes and natural assets will continue to be protected and enhanced for their intrinsic value to biodiversity and tackling climate change as well as their recreational and economic value to local people and visitors alike.
- 9.7 This Vision is supported by a number of Objectives including:
- Ensuring good design that reinforces Rossendale's local character.
 - Reducing the impact of and adapting to climate change, including suitable flood prevention measures, the promotion and protection of Green Infrastructure and green energy projects.
 - Protecting and enhancing natural assets and improving biodiversity.
 - Conserving and enhancing the historic environment.
- 9.8 The Strategic Priorities recognise the importance of green and renewable energy projects as part of the solution to reducing the impact of climate change. Those of relevance are:
- Enhancing the Borough's biodiversity including through the use of the Scout Moor Habitat Enhancement Fund to deliver upland restoration projects.
 - Addressing the Climate Change emergency through the enhancement of Green Infrastructure, provision of electric charging points and delivery of renewable energy projects.

Places for Everyone

- 9.9 PfE sets out its aspirations to make Greater Manchester one of the best places in the world to grow up, get on and grow old. This includes becoming a "*place at the forefront of action on climate change*".
- 9.10 PfE establishes a series of Strategic Objectives to support this aspiration. The following Strategic Objectives are of relevance to the Proposed Development:
- Objective 3: Playing a part in ensuring a thriving and productive economy in all parts of Greater Manchester.
 - Objective 4: Maximise the potential arising from national and international assets including ensuring infrastructure provision supports growth.
 - Objective 7: Playing a part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region, including promoting carbon neutrality of new development by 2038 and improving the generation of renewable energy.

- Objective 8: Improving the quality of the natural environment and access to green spaces.
- Objective 9: Ensuring access to physical and social infrastructure, including improving the capacity of energy systems in key growth locations.

Rochdale Core Strategy

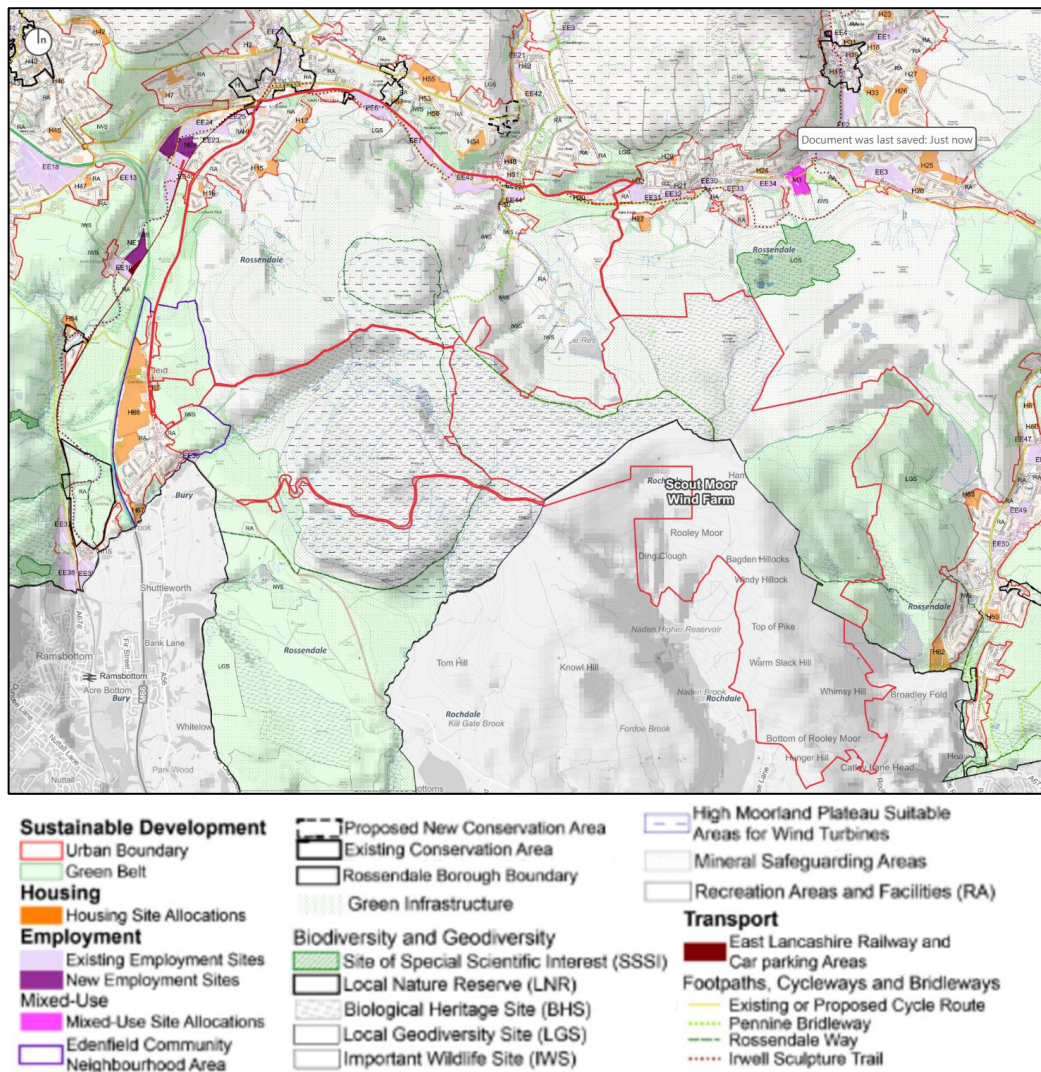
- 9.11 The Rochdale CS's Spatial Strategy for the Borough seeks to grow the economy and develop the area through cooperation and partnership, improving the lives of local residents.
- 9.12 The Rochdale CS sets out a series of Strategic Objectives, of which the following are of relevance to the Proposed Development:
- SO1 – To deliver a more prosperous economy, including by building on the borough's assets and improving its image to attract investment.
 - SO3 – To improve design, image and quality of place.
 - SO4 – To promote a greener environment, including by minimising Rochdale's contribution to climate change and mitigating and adapting to its adverse effects, as well as ensuring that new development contributes to carbon reduction.

Site-Specific Designations

Rossendale Local Plan

- 9.13 **Figure 7.1** identifies the designations of the Rossendale LP relevant to the Site.

Figure 9.1: Extract of Rossendale Local Plan Map



Rossendale LP Policy ENV7 (Wind Turbines)

- 9.14 The Rossendale LP Policies Map identifies that part of the Site is identified as High Moorland Plateau Suitable Areas for Wind Turbines under Rossendale LP Policy ENV7, which is considered to be suitable for new larger turbines or re-powering of existing ones, provided areas of deep peat (over 40cm depth) and blanket bog are avoided. Policy ENV7 confirms that the development of new wind turbines over 25 metres in height or re-powering of existing machines outside these areas would be resisted. However, the policy is internally contradictory as it also confirms that commercial proposals for new wind turbines or re-powering of existing schemes outside Suitable Areas defined on the Policies Map should demonstrate that the criteria used for designating these areas have been fully addressed in their proposals. In both cases (i.e. within or outside defined suitable areas) proposals are also required to address a series of other criteria; these are listed in full in the Renewable Energy Policies section of this PDAS.

Rossendale LP Strategic Policy SD2 (Urban Boundary and Green Belt)

- 9.15 The Rossendale LP Policies Map identifies that the Site sits outside of the Urban Boundary and that the south-eastern stretch of the Site is within RBC's Green Belt. Rossendale LP Strategic Policy SD2 states that all new development in the Borough will take place within the Urban Boundaries, except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area.

Rossendale LP Policy ENV5 (Green Infrastructure Networks)

- 9.16 The Rossendale LP Policies Map identifies that a Green Infrastructure Network covers the Site. Rossendale LP Policy ENV5 expects development proposals to support the protection, management, enhancement and connection of Green Infrastructure networks, aiming first to avoid or, if not feasible, mitigate biodiversity impacts on-site. This policy also confirms that where practicable and appropriate, new Green Infrastructure assets incorporated into development proposals should be designed and located to integrate into the existing Green Infrastructure network and should maximise the range of Green Infrastructure functions and benefits achieved.

Rossendale LP Policy ENV4 (Biodiversity, Geodiversity and Ecological Networks)

- 9.17 The Rossendale LP Policies Map identifies that the Site partially includes the Scout Moor Biological Heritage Site ('BHS') and Cowpe Moss and Brandwood Moor BHS. Rossendale LP Policy ENV4 confirms that development that has the potential to affect a national or locally designated site, and its immediate environs, or on protected habitats or species, will be expected to be accompanied by relevant surveys and assessments detailing likely impacts. This policy also confirms that development proposals should protect areas of biodiversity and protected species; areas of geodiversity and ecological networks, and where possible enhance sites and linkages. Any adverse effects should be first of all avoided; if this is not possible, minimised and mitigated against, and where this cannot be achieved, compensated for.

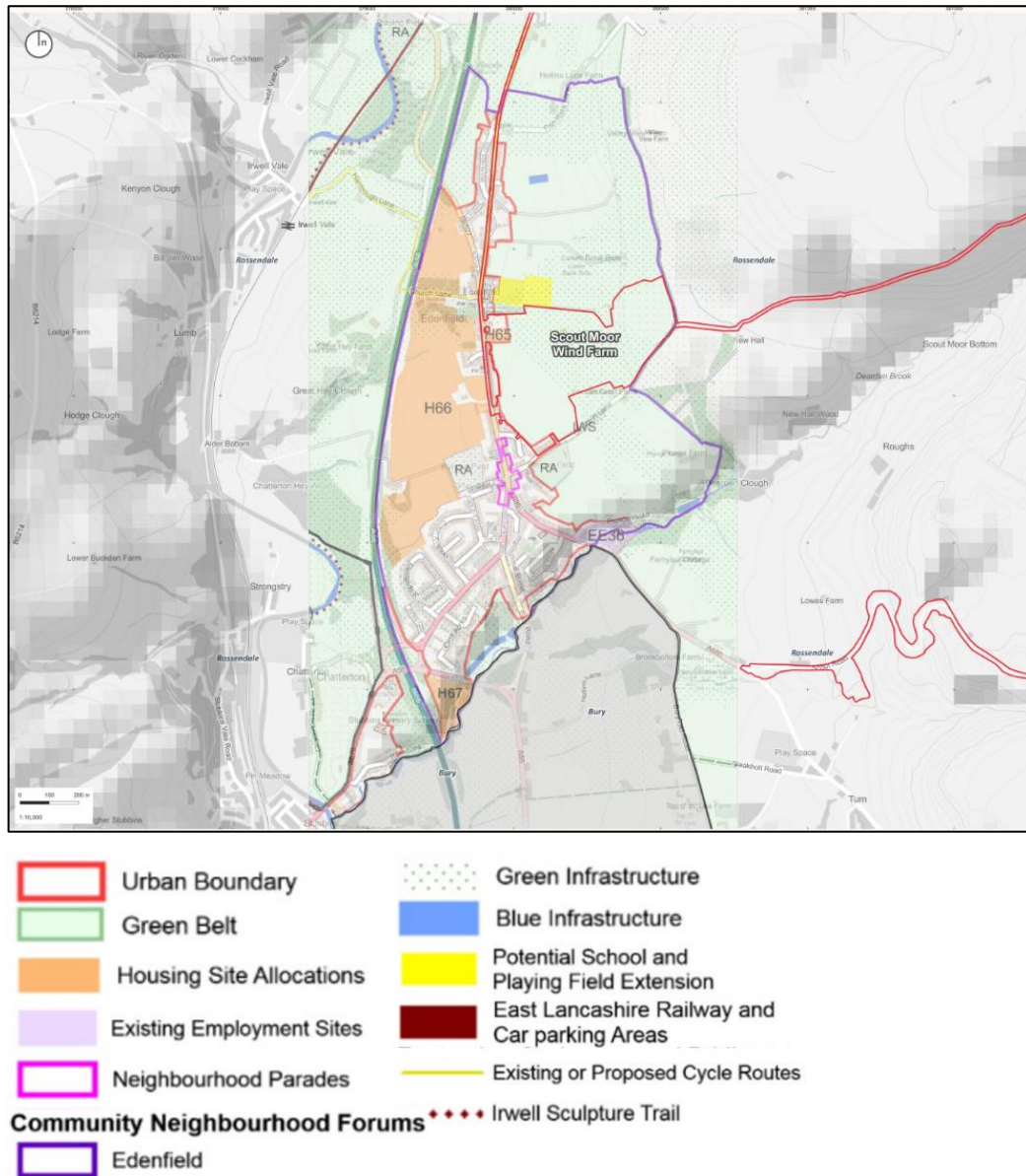
Rossendale LP Policy TR2 (Footpaths, Cycleways and Bridleways)

- 9.18 The Rossendale Way and Pennine Bridleway cut across the central of the Site. Rossendale LP Policy TR2 confirms the Council will support the development and enhancement of a strategic public rights of way (PRoW) network including enhancements to surfacing, signage, supporting facilities, and feeder routes.

Edenfield Neighbourhood Plan

- 9.19 Grid Connection Route C extends through the designated Edenfield Neighbourhood Area where it follows the highway along A680 Market Street and therefore this component of the Proposed Development is subject to the policies of the Edenfield NP.

Figure 9.2: Extract of Edenfield Neighbourhood Plan Map



Edenfield NP Policy UB1 (Development and the Urban Boundary)

- 9.20 NP Policy UB1 confirms that future development in the Edenfield Neighbourhood Area should be focused within the Urban Boundary, and that development proposals will be supported within the Urban Boundary subject to compliance with other policies in the NP.

Joint Lancashire Minerals and Waste Local Plan

- 9.21 The Rossendale LP Policies Map identifies the Site is located within a Minerals Safeguarding Area.
- 9.22 Lancashire Minerals and Waste CS Policy CS1 (Safeguarding Lancashire's Mineral Resources) states that mineral resources with the potential for extraction now or in the future will be identified as Mineral Safeguarding Areas and protected from permanent

sterilisation by other development. Extraction of mineral resources prior to other forms of development will be encouraged.

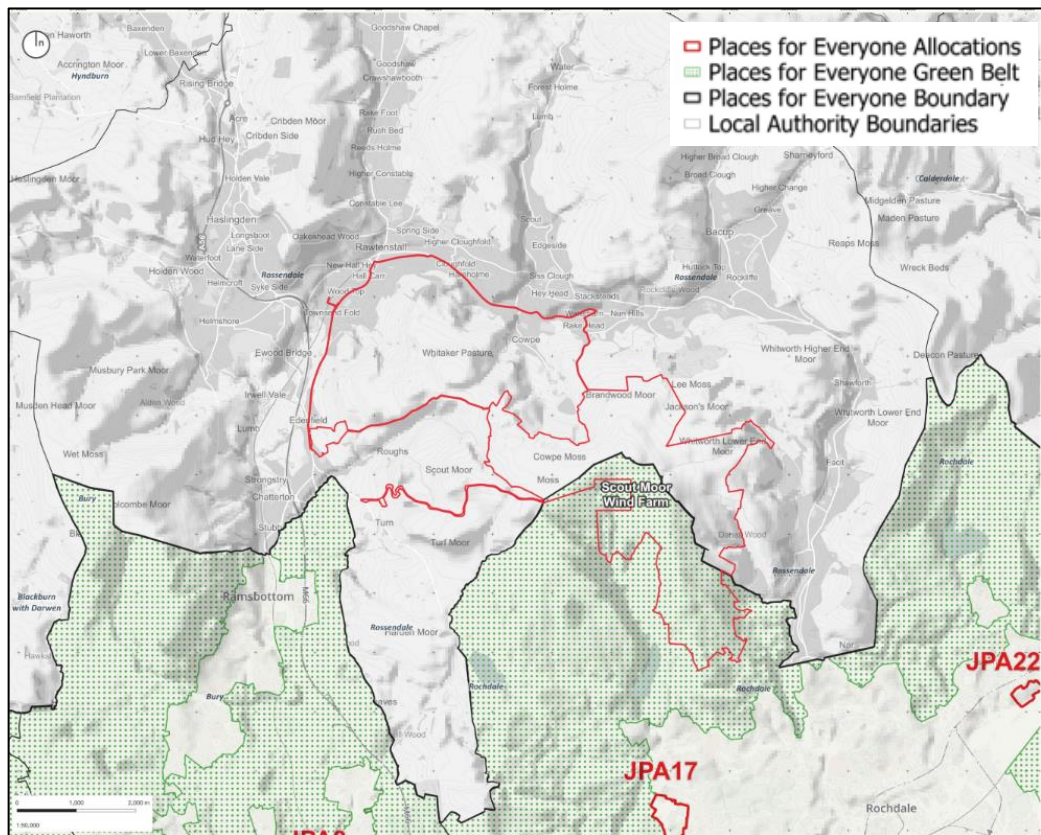
9.23 Lancashire Minerals and Waste SADMP Policy M2 (Safeguarding Minerals) clarifies that, within these mineral safeguarding areas, planning permission will not be supported for any form of development that is incompatible by reason of scale, proximity and permanence with working the minerals, unless the applicant can demonstrate to the satisfaction of the LPA that:

- The mineral concerned is no longer of any value or has been fully extracted.
- The incompatible development is of a temporary nature and can be completed and the site returned to its original condition prior to the minerals being worked.
- There is an overarching need for the incompatible development that outweighs the need to avoid the sterilisation of the mineral resource.

Places for Everyone

9.24 The part of the Site located within Rochdale is wholly located within the Green Belt, as defined by the PfE Policies Map.

Figure 9.3: Extract of PfE Policies Map



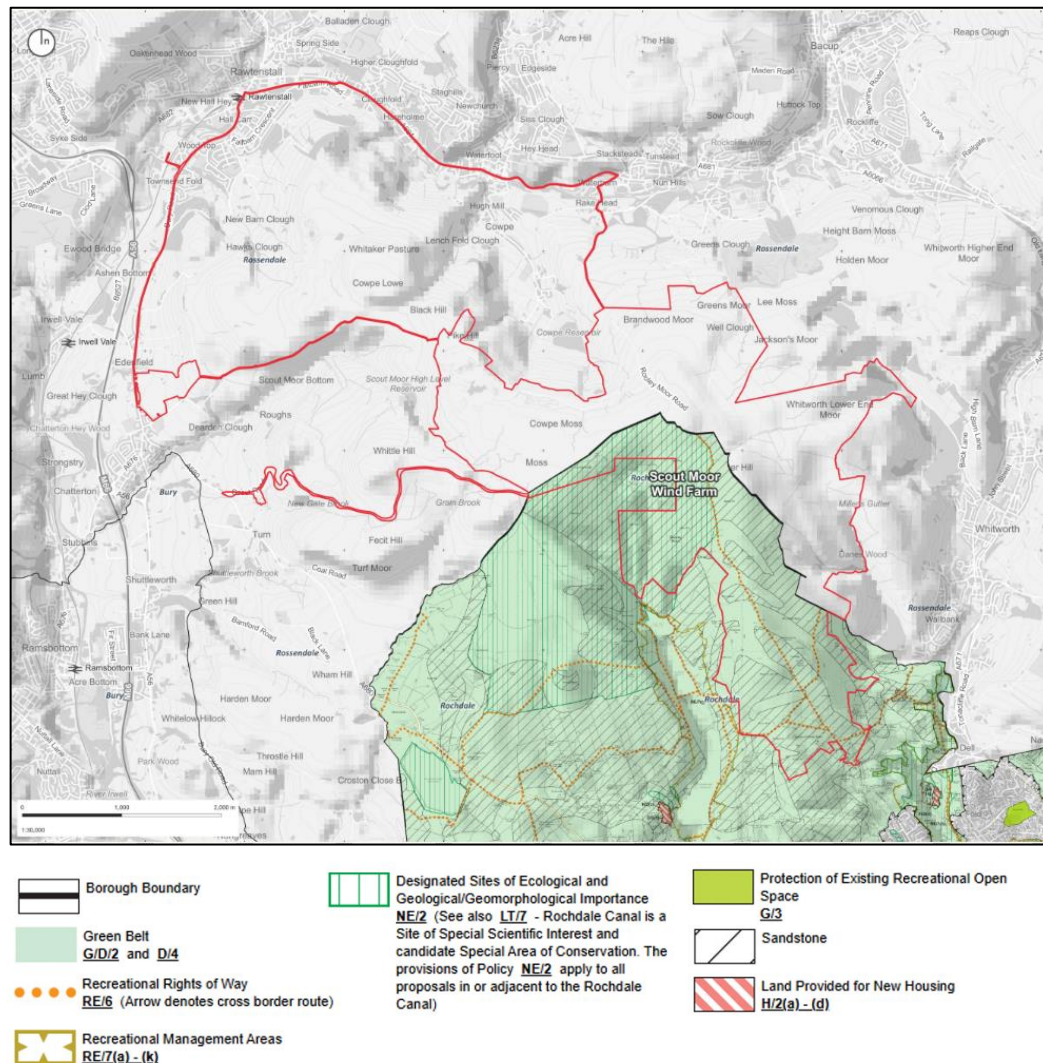
PfE Policy JP-G9 (The Green Belt)

- 9.25 PfE Policy JP-G9 (The Green Belt) reiterates the five purposes of the Green Belt as defined in the NPPF (Policy GB2) and states that the beneficial use of the Green Belt will be enhanced where this can be achieved without harm to its openness, permanence or ability to serve the five purposes. In particular, the enhancement of the Green Belts' green infrastructure functions will be encouraged, such as improved public access and habitat restoration, helping to deliver environmental and social benefits for residents and providing the high-quality green spaces that will support economic growth.

Rochdale Core Strategy and Unitary Development Plan

- 9.26 The part of the Site located within Rochdale is subject to the following designations and their relevant policies are summarised below.

Figure 9.4: Extract of Rochdale Policies Map (subject to updates to reflect PfE)



CS Policy G4 (Protecting Green belt) and Rochdale UDP Policy G/D/2 (Green Belt)

- 9.27 As confirmed in Table A.5 Appendix A of PfE, Rochdale CS Policy G4 (Protecting Green belt) and Rochdale UDP Policy G/D/2 (Green Belt) are wholly superseded by PfE Policy JP-G9 (The Green Belt) – therefore these policies are not relevant to the determination of the Application.

Rochdale UDP Policy RE/6 (Recreational Rights of Way)

- 9.28 A number of Strategic Recreational Rights of Way cut across the Site, including the Pennine Bridleway and Mary Townley Loop. Rochdale UDP Policy RE/6 (Recreational Rights of Way) confirms that these routes should be protected, developed and improved to link areas of managed and accessible countryside and establish links with routes in the wider region, including from urban areas. Where opportunities and resources permit, the Council will support and implement enhancement schemes such as waymarking, picnic, interpretation and other facilities along the routes.

Rochdale UDP Policy NE/2 (Designated Site of Ecological and Geological/ Geomorphological Importance)

- 9.29 A Regionally Important Geological / Geomorphological Site and Site of Biological Importance dissects the Site.
- 9.30 Rochdale UDP Policy NE/2 (Designated Sites of Ecological and Geological/ Geomorphological Importance) states that development will only be permitted where:
- It would not adversely affect the fundamental nature conservation value of the site as defined by appropriate expert assessment;
 - Provision has been made by the developer to ensure the safeguarding of the substantive nature conservation value of the site;
 - The reasons for the proposal which outweigh the need to safeguard the substantive nature conservation value of the site have been clearly demonstrated; and
 - The loss is mitigated by providing appropriate compensatory nature conservation benefits either on or off-site.

- 9.31 This policy also confirms that in all cases where development is permitted, conditions or planning obligations should be used where they are required to ensure the protection and enhancement of the Site's nature conservation value.

Greater Manchester Joint Minerals Plan

- 9.32 The Site is located within a Minerals Safeguarding Area for Sandstone.
- 9.33 GM Minerals Plan Policy 8 (Prior Extraction of Mineral Resources) clarifies that all non-mineral development proposals within the Mineral Safeguarding Area should extract any viable mineral resources present in advance of construction except where the following circumstances apply:

- The need for the development outweighs the need to extract the mineral; or
- It can be clearly demonstrated that it is not environmentally acceptable or economically viable to extract the mineral prior to non-mineral development taking place; or
- It can be clearly demonstrated that the mineral is either not present or of no economic value or too deep to extract in relation to the proposed development; or
- The development is limited⁸⁹ or temporary and would not prevent minerals extraction taking place in the future.

Renewable Energy Policies

Rossendale Local Plan

9.34 As set out above, Rossendale LP Policy ENV7 (Wind Turbines) sets out that proposals for commercial wind farms and turbines within and outside areas of suitability will only be supported if the following criteria are addressed to the satisfaction of the Local Planning Authority:

- The impacts identified by the local community have been taken into account and fully addressed;
- The scale, height and siting of the turbine(s) and all supporting information is appropriate to the area taking into account:
 - The vertical height and horizontal expanse of the topography;
 - The degree of openness of the landscape;
 - The scale of adjacent landscape features, buildings and walls;
 - The proximity to designated and non-designated built heritage assets;
 - The proximity to distinctive landforms, such as a ridgeline, knoll or rock outcrop, which makes a key contribution to local landscape character;
 - The presence of existing settlement or field patterns; and
 - The opportunities to screen or reduce the visual impact of the development;
- It would not result in the loss of, or significantly detract from, key views of scenic landmarks or landscape features;
- The design, colour, layout and arrangement of turbines are appropriate to their setting;

⁸⁹ Limited being proposals which retain existing infrastructure, such as foundations, buildings and utilities.

- The proposal would not result in unacceptable visual clutter in combination with other existing structures, with cumulative impacts fully assessed to the satisfaction of the Council;
- There would be no unacceptable harm to neighbour amenity, protected species or the use of public rights of way or bridleways or a severe impact on highway safety;
- Shadow and reflective flicker impacts on buildings and public rights of way are fully assessed with a precautionary approach taken to mitigation;
- The scheme would not result in unacceptable noise impacts, including amplitude modulation, on residential properties and other sensitive users;
- The impact on geology, including former mine workings, peat and hydrogeology is fully appraised and issues identified addressed, including restoration plans as appropriate;
- No development is proposed on areas of peat of over 40cm depth;
- Impacts on designated species and ecological assets are avoided or minimised;
- The proposal does not cause unacceptable harm to any heritage assets and their setting;
- The impact on recreational assets is assessed and impacts on key routes such as the Pennine Bridleway and Rossendale Way are avoided or if this is not possible, mitigated;
- The scale, siting and design of any ancillary structures and access tracks are appropriate to the character of the area and the landscape setting;
- The submission contains a Construction Management Plan, including impacts on the Highway network, and incorporates proposals for managing the decommissioning and removal of the turbines and the restoration of the site;
- Any landscape features removed or altered to enable the erection of the turbine are reinstated and the design, materials and scale of any new fencing or walling needed is appropriate to the character of the local area;
- Issues with respect to the following are appropriately addressed to the satisfaction of the LPA:
 - Shadow and reflective flicker;
 - TV and phone reception;
 - Air traffic radar reception; and
- A de-commissioning scheme is included.

Rochdale Core Strategy

9.35 Rochdale CS Policy SP1 (Rochdale borough's role in the city region) confirms that RMBC will seek to *"contribute to the success of the Manchester city region and the North West by playing its part in the delivery of sustainable development and investment that meets national and sub regional objectives for housing and employment growth"*. Policy SP1 (part g) confirms that one way this will be achieved is by delivering *"appropriate opportunities for renewable energy generation where adverse impacts can be satisfactorily addressed to support wider sub regional development and environmental objectives"*.

9.36 Rochdale CS Policy E2 (Increasing Jobs and Prosperity) seeks to promote the delivery of various infrastructure, including energy, with a focus on supporting economic development.

9.37 The first paragraph of Rochdale CS Policy G3 (Renewable & Low Carbon Development) is replaced by PFE policies, including PFE Policy JP-S2 (Carbon and Energy), which is summarised below. The remaining elements of Rochdale CS Policy G3 (Renewable and Low Carbon Energy Developments) confirm that any proposal for wind farm development:

- Must avoid harm to the health and safety of the public, including through nuisance or adverse impact on highway safety by conflict with or undue distraction to road users.
- Must ensure any harm to the following is minimised and appropriately mitigated:
 - The visual character and quality of the landscape or townscape and the physical record of the historic and cultural evolution of the landscape;
 - The setting of heritage assets including Scheduled Ancient Monuments, Conservation Areas and Listed Buildings;
 - Local residents and their amenity;
 - Biodiversity including protected species, statutory and locally designated sites and important habitats, and geodiversity;
 - The value of the borough's peatlands as an ecological and hydrological resource and as a carbon sink;
 - The value of the surrounding area for relaxation and recreation;
 - Water quality;
 - Land which is used for water catchment purposes and which is critical to the delivery of water supply; and
 - Highway safety.

- Must demonstrate the best use of location, topography, siting, design and colour to minimise its visual and other impacts, including any cumulative impacts.
- Any ancillary structures and access roads should employ sensitive design and the use of local materials to respect the character and appearance of the setting.
- The visual impact of infrastructure associated with renewable energy developments should be satisfactorily addressed, including by routing power lines underground wherever possible.
- All proposals should seek to minimise the length of cable connection in order to reduce the visual impact of such structures when sited above ground.
- It must be demonstrated that the proposal will not result in electro-magnetic interference with local television reception and specialist radio communication networks.
- Planning permission will be subject to a condition that if a wind turbine generator, or other redundant plant or infrastructure, is not producing electricity for six months or more, it shall be removed and the site fully restored to a use and condition appropriate to its surroundings in accordance with this plan.
- Planning permission will only be granted if:
 - The development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and
 - Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.

Places for Everyone

- 9.38 Policy JP-S2 (Carbon and Energy) sets the aim to deliver a carbon neutral Greater Manchester no later than 2038, with a dramatic reduction in greenhouse gas emissions. Part 3 of the policy confirms that this will be supported through taking a positive approach to renewable and low carbon energy schemes.
- 9.39 The supporting text of Policy JP-S2 (Carbon and Energy) clarifies that the advantages of increasing renewable and low carbon energy capacity will need to be balanced against any potential impacts such as on residential amenity, local environment and landscape character, sites of conservation and heritage value, telecommunications and aviation equipment and air quality (Paragraph 5.16).

Development Management Policies

- 9.40 The adopted Development Plans for Rossendale and Rochdale also include general development management policies relevant to the Proposed Development and consideration of the Application. For the sake of brevity, these are not recited in full here but are listed thematically in the schedule at **Appendix 1** and considered in the assessment of the Proposed Development in the following sections of this PDAS.

Other Material Considerations

Documents that are capable of being ‘other material considerations’ in the determination of the Application include:

- The National Planning Policy Framework (adopted August 2026) (‘the NPPF’).
- Planning Practice Guidance (‘PPG’), including the Renewable and Low Carbon Energy PPG (August 2023).
- Adopted National Policy Statements (NPS’s) for Energy Infrastructure, including the Overarching National Policy Statement for Energy (EN-1) and the NPS for Renewable Energy Infrastructure (EN-3).
- Adopted and emerging Supplementary Planning Documents (‘SPD’) and Guidance (‘SPG’).
- The Emerging Development Plan⁹⁰
- A range of other National, Regional and Local Policies & Strategies.

National Planning Policy Framework (August 2026)

9.41 The NPPF sets out the Government’s planning policies for England and how these are expected to be applied. Extensive parts of the NPPF are of relevance and for the sake of brevity are not recited in full here but are listed thematically in the schedule at **Appendix 1** and considered in the assessment of the Proposed Development in the following sections of this PDAS.

9.42 However, the following sections of the NPPF are of particular relevance.

- **Achieving Sustainable Development** – NPPF Policy S3 confirms that planning decisions must apply a ‘presumption in favour of sustainable development’, which in the context of the Proposed Development means:
 - Outside settlements applying NPPF Policy S5⁹¹ – whereby only certain types of development (which includes energy infrastructure and engineering operations under Policy S5(1)(a)) should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the NPPF. In applying Policy S5, the circumstances in which the benefits of approving development proposals are likely to be substantially outweighed by adverse effects include, but are not restricted to, situations where the development proposal would fail to comply with one of the

⁹⁰ RBC have formally started working on the new Rossendale Local Plan, which will in time replace the Rossendale Local Plan 2019-2036. The scoping consultation and Call for Sites exercise are expected to start on 15 June 2026. Given the emerging Rossendale Local Plan is in its early stages of development with no draft policies, it carries limited weight and is not referred to again. RMBC published their Regulation 19 Publication Draft Local Plan for consultation in August 2026, running until 25 September 2026 – a summary of this plan is set out below. However, as the emerging Rochdale Local Plan is in its early stages of development, it carries limited weight.

⁹¹ Apart from proposals within the Green Belt, whereby NPPF Policies GB6, GB7 and GB8 apply.

national decision-making policies in the NPPF which state that development proposals should be refused in specific circumstances; and

- In all locations, development proposals that accord with both an up-to-date Development Plan and the decision-making policies in the NPPF should be approved without delay.
- **Protecting Green Belt land** – NPPF Policy GB6 confirms that development in the Green Belt is inappropriate unless it falls within one of the categories in NPPF Policy GB7. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Such circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposed development, is clearly outweighed by other considerations. In making this assessment, **substantial weight** should be given to the harm to the Green Belt which would be caused, including harm to its openness. The policy goes on to confirm that in the case of proposals for renewable energy development, very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources (paragraph 3).

NPPF Policy GB7 confirms that the following types of development are not regarded as inappropriate, and therefore should not be regarded as harmful to the Green Belt or be required to demonstrate very special circumstances (provided the impact on the openness of the Green Belt is minimised, and there would not be a significant conflict with the Green Belt purposes):

- Engineering operations required in a Green Belt location;
- Electricity network infrastructure required in a Green Belt location; and
- The provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor recreation.
- **Meeting the challenge of climate change** – NPPF Chapter 5 confirms that the objective of the policies in the chapter is “*to support the transition to net zero by 2050 and to shape places in ways which are more resilient to the effects of climate*”. Policy CC2(f) confirms that in order to contribute to climate change mitigation and the transition to net zero, development proposals should contribute to the creation or restoration of habitats which can act as carbon stores, such as through woodland planting and peatland restoration, while avoiding harm to habitats which can act as important carbon stores, including peatland.
- **Securing Clean Energy** – Policy W3 confirms that **substantial weight should be given to the benefits associated with the development of renewable and low carbon energy infrastructure for improving energy security, supporting economic development and the transition to a net zero future⁹²**. The policy confirms that applicants are not required to demonstrate the ‘need’ for the

proposal (paragraph 2). It also confirms that where proposals for this form of development come forward outside areas which have been identified as being suitable for them in a Development Plan, their acceptability should be assessed against the national decision-making policies in the NPPF, taken as a whole (paragraph 2). Where development is expected to be time-limited, the policy confirms that applications should be accompanied by proposals for decommissioning and site restoration, including details of how these measures are expected to be implemented (paragraph 3).

- **Building a strong, effective economy** – Policy E2(1) confirms that to support business growth, **substantial weight**⁹³ should be given to the economic benefits of proposals for commercial development, especially where this would support the economic vision and strategy for the area and/or the implementation of the Industrial Strategy.
- **Making effective use of land** – Policy L2 confirms that **substantial weight**⁹⁴ should be given to the benefits where a development proposal would remediate despoiled, degraded, derelict, contaminated or unstable land.

Emerging Rochdale Local Plan (August 2026)

- 9.43 The Rochdale Borough Local Plan Publication Plan was issued for the purpose of the Regulation 19 consultation on 14 August 2026, running until 25 September 2026.
- 9.44 The draft Spatial Vision confirms that *“more renewable energy will be produced and used locally”*. This is underpinned by a series of Strategic Objectives which include the ambition to create *“a sustainable and resilient place”* (SO1) which will contribute to GM’s target of net zero by 2038 and *“support the production of renewable energy where appropriate”*. The Spatial Priorities for the Borough includes seeking to *“support opportunities for renewable energy generation where appropriate”*.
- 9.45 Draft Policy S3 (Renewable and Low Carbon Energy Infrastructure) confirms that proposals for renewable and low carbon energy infrastructure will be supported providing there is no unacceptable impact on a range of receptors (including amenity, highways, landscape character, heritage, biodiversity, geodiversity, water resources, flood risk, open space and PRow/recreation). It requires the landscape impacts to be minimised and appropriately mitigated against, with applications accompanied by an LVIA. It also confirms that renewable energy proposals should look to deliver multiple benefits where possible, such as for habitats and agriculture and include details of the arrangements for decommissioning and aftercare/restoration.
- 9.46 The supporting text to Draft Policy S3 confirms that *“increasing renewable energy generation is essential to achieving the transition to a low carbon economy and meeting carbon reduction targets”* and that *“it can also boost energy independence, reduce energy bills and support high-skilled jobs”*. It also confirms that *“while the benefits of renewable energy are recognised it is important that they do not have an unacceptable*

⁹³ Our emphasis

⁹⁴ Our emphasis

impact on the environment and maximise opportunities for enhancements where possible”.

- 9.47 The Draft Local Plan also sets out policies in relation to design (Draft Policy PE1); landscape (Draft Policy G8 and PE4); climate change (Draft Policy S2); ecology, biodiversity and arboriculture (Draft Policies G1, G6 and G7); peat (Draft Policy G7); green infrastructure (Draft Policy G3), ground conditions (Draft Policy S5); light, noise and air pollution (Draft Policy S5); water quality (Draft Policy S4 and S5); transport impacts (Draft Policies T1 and T4); flood risk and drainage (Draft Policies S4); aviation (Draft Policy S3); minerals (Draft Policy M3).
- 9.48 Draft Policy DM1 (General Development Requirements) sets out the general development requirements for all development proposals, including considerations on design, compatibility with surrounding land uses, amenity and safety, pollution and land contamination.

Planning Practice Guidance

- 9.49 The Government has adopted a range of PPG which builds upon and supports the policies in the NPPF. Extensive parts of the PPG are of relevance to the Proposed Development. For the sake of brevity, these are not recited in full here but are listed thematically in the schedule at **Appendix 1** and considered in the assessment of the Proposed Development in the following sections of this PDAS.

National Policy Statements

- 9.50 The energy National Policy Statements (“NPSs”) set out the government’s policy for the delivery of Nationally Significant Infrastructure Projects (“NSIPs”) and other infrastructure development in the field of energy, providing the predominant planning policy framework for planning decisions in respect of such development. They were first designated and published in 2011.
- 9.51 The latest NPSs came into force on 06 January 2026, including the Overarching National Policy Statement for Energy (EN-1) and the NPS for Renewable Energy Infrastructure (EN-3), as explored further below.
- 9.52 Whilst the Proposed Development is not an NSIP, the NPS are important material considerations as they provide an up-to-date expression of government policy on energy infrastructure. This is reflected at Chapter 1, Paragraph 13 of the NPPF, which confirms that NPS’ *“may, where relevant, be a material consideration in ... making decisions on planning applications”*.

The Overarching National Policy Statement for Energy (EN-1)

- 9.53 NPS EN-1 sets out the Government policy for the delivery of major energy infrastructure development and its ambition to decarbonise the power sector.
- 9.54 Paragraphs 1.2.1 and 1.2.2 of NPS EN-1 state that: *“In England, this NPS, in combination with any relevant technology specific NPSs, may be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended). Whether the policies in this NPS are material and to what extent, will be judged on a case-by-case basis and will depend upon the extent to which the matters are already covered by applicable planning policy”*

- 9.55 Paragraph 3.3.3 highlights that the demand for electricity could more than double by 2050 *“as large parts of the economy including transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity”*.
- 9.56 Paragraphs 3.3.62 and 4.2.16 of NPS EN-1 confirm that the Government has concluded that there is a Critical National Priority (‘CNP’) for the provision of nationally significant low carbon infrastructure.
- 9.57 Infrastructure is defined as nationally significant low carbon infrastructure. Low carbon infrastructure is defined as *“... for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion...”* (Paragraph 4.2.17).
- 9.58 Paragraph 3.3.63 of NPS EN-1 states that:
- “the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, means that it is likely the need case will outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional circumstances. **Government strongly supports the delivery of CNP infrastructure and it should be progressed as quickly as possible.**”* (emphasis added).
- 9.59 The CNP policy has been applied to decisions within the Town & Country Planning regime, recognising that low carbon energy infrastructure proposals which contribute to achieving the objectives of the Clean Power 2030 Action Plan can be considered as CNP.
- 9.60 In granting planning permission for a Battery Energy Storage proposal at Lowlands Farm, Halesowen (Ref. APP/C4615/W/24/3341383) within Dudley Metropolitan Borough Council, the Inspector had regard to paragraph 4.1.7 of NPS EN-1, which states that it is likely that the need for CNP projects will outweigh the residual effects in all but the most exceptional cases. In conducting the Green Belt balance, the Inspector therefore gave significant weight to *“the fact that low carbon development is a critical national policy which can help to achieve net zero, provide energy security and energy flexibility”*⁹⁵.
- 9.61 A similar statement was made in the appeal decision for a Battery Energy Storage proposal at Whites Farm, Essex (Ref. APP/V1505/W/23/3332888) within Basildon Borough Council, with the Inspector stating: *“Provision of battery energy storage is a Critical National Priority (CNP) as set out in NPS EN-1, and it is undisputed that the proposal falls within this category”*⁹⁶.
- National Policy Statement for Renewable Energy Infrastructure (EN-3)**
- 9.62 NPS EN-3 outlines the Government’s framework for decision-making on the development of all forms of renewable energy projects which currently fall within the NSIP definition – therefore the existing EN-3 does not relate to onshore wind.

⁹⁵ Paragraph 34, Inspectors Report relating to Appeal Ref: APP/C4615/W/24/3341383, Lowlands Farm, Illey Lane, Halesowen B62 0HJ (September 2024)

⁹⁶ Paragraph 31, Inspectors Report relating to Appeal Ref: APP/V1505/W/23/3332888, Whites Farm, Barleylands Road, Basildon, Essex, SS15 4BC (June 2024)

NPS Updates Consultation

- 9.63 In line with the commitments in the Clean Power 2030 Action Plan, DESNZ launched a consultation on updates to NPS EN-1 and EN-3 on 24 April 2025, running to 29 May 2025. The Consultation Report⁹⁷ confirms that key updates to the NPS's include:
- *"The policy narrative through NPS EN-1 has been updated to bring Clean Power 2030 front and centre as the primary policy that the NPS's enable. It points towards the Clean Power 2030 Action Plan, which contains the capacity ranges for technologies in 2030 that the NPSs support. Successfully delivering Clean Power 2030 will require rapid deployment of new clean energy capacity. Delivering Clean Power 2030 also paves the way to decarbonising the wider economy by 2050, and focussing the narrative around the planning system on it will enable us to meet those ranges by ensuring developers bring forward relevant projects"* (Page 9).
 - *"Projects relevant for Clean Power 2030 can be deemed Critical National Priority (CNP), with a presumption in favour of consent"* (Page 9). The CNP policy was introduced in the previous amendments to the NPS's and is set out above under the summary of existing NPS EN-1. The policy allows for the importance of low carbon infrastructure to be considered during the decision-making process by the Secretary of State. The policy means that for qualifying infrastructure projects, where residual impacts remain after the mitigation hierarchy has been applied, it is unlikely that consent will be refused on the basis of these residual impacts.
 - Reflects the re-introduction on onshore wind (100MW or over) into the NSIP consenting regime from 31 December 2025 (as per the Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025). The consultation notes that *"the mass deployment of onshore wind farms is critical in meeting the government's 2030 clean power pathway"* (Page 10).
- 9.64 Draft Updated NPS EN-3 sets out the approach to onshore wind at Section 2.12, confirming that *"the deployment of onshore wind farms is critical in meeting the government's Clean Power 2030 Mission"* (paragraph 2.12.2).
- 9.65 NPS EN-3 sets out a range of criteria and requirements relevant to the assessment of onshore wind. For the sake of brevity, these are not recited in full here but are listed thematically in the schedule at **Appendix 1** and considered in the assessment of the Proposed Development in the following sections of this PDAS:
- Supplementary Planning Documents/ Guidance**
- 9.66 There are various adopted SPDs and Guidance which are of relevance, including:
- Rossendale:
 - Climate Change SPD (November 2022).

⁹⁷ [Planning for new energy infrastructure: revised draft National Policy Statements for energy infrastructure](#)

- Compensation Measures for Green Belt Release (January 2023).
- Rochdale:
 - Biodiversity and Development SPD (Updated February 2017).
 - Climate Change Adaptation SPD (June 2012).
 - Design and Planning Process: A Guide to Good Practice SPD (2007).
 - Urban Design Guide SPD (2007).
 - Holcroft Moss Planning Obligations Joint SPD (May 2025).
 - South Pennine Moors Special Area of Conservation (SAC) / Special Protection Areas (SPAs) Joint SPD (May 2025).

9.67 For the sake of brevity, these are not recited in full here but are listed thematically in the schedule at **Appendix 1** and considered in the assessment of the Proposed Development in the following sections of this PDAS.

Other Relevant Policies or Strategies

9.68 Other national policies & strategies in relation to net zero and renewable energy include:

- Written Ministerial Statement on updated policy for planning for onshore wind development in England (05 September 2023)
- Clean Power 2030: Advice on achieving clean power for Great Britain by 2030 (2024)
- Clean Power 2030 Action Plan: A new era of clean electricity (2024)
- UK Climate Change Act (2008) and Carbon Budgets
- Energy Act 2023
- Assessing Onshore Wind Applications – Guidance for Local Planning Authorities in England (DESNZ, Great British Energy & Regen)
- NatureScot Siting and Designing Wind Farms in the Landscape (Version 3a)
- Historic England Advice Note 15 (Second Edition) – Delivering Clean Power: Commercial Renewable Energy Development and the Historic Environment

9.69 Other national policies or legislation which are of relevance, include:

- Environment Act 2021
- National Planning Policy for Waste (October 2014)
- UK Peatland Strategy 2018-2040

- England Peat Action Plan (May 2021)
- England Peat Map (May 2025)

9.70 Other regional policies & strategies in relation to net zero and renewable energy include:

- Landscape Capacity Study for Wind Energy Developments in the South Pennines (January 2010)
- Net Zero North West Cluster Plan (January 2023)
- South Pennines Wind Energy Landscape Study ('SPLS') (October 2014)
- Lancashire 2050 – A strategic framework for Lancashire
- Lancashire Energy Strategy (September 2018)
- Whole Systems Smart Energy Plan for Greater Manchester (April 2019)
- Greater Manchester Spatial Energy Plan: Evidence Base Study
- Greater Manchester Five Year Environment Plan 2025-2030 (December 2024)

9.71 Other local policies & strategies in relation to net zero and renewable energy include:

- Rossendale Borough Council 2020-2030 Climate Change Strategy
- Economic Development Strategy for Rossendale
- Rochdale Climate Change Strategy and Delivery Plan 2021-2025 and Action Plan
- Rochdale Local Area Energy Plan (June 2022)
- South Pennines Wind Energy Landscape Study (October 2014)

9.72 For the sake of brevity these are not recited in full here but are summarised and considered in the assessment of the Proposed Development presented in the following sections of this PDAS.

Common Land Legislation

9.73 Common Land is protected under the legislation of Commons Act 2006, which governs the registration, protection and management of Common Land.

9.74 Under Section 38 of the Commons Act 2006, "*a person may not, except with the consent of the appropriate national authority, carry out any restricted works on land to which this section applies*⁹⁸." Restricted works refer to:

⁹⁸ (a) Common Land, (b) land not registered which is (i) regulated by an Act made under the Commons Act 1876 (c. 56) confirming a provision order of the Inclosure Commissioners, or (ii) subject to a scheme under

- Works which have the effect of preventing or impeding access to or over any land to which this section applies, include in particular
 - The erection of fencing;
 - The construction of buildings and other structures;
 - The digging of ditches and trenches and the building of embankments.
- Works for the resurfacing of land, specifically consist of the laying of concrete, tarmacadam, coated roadstone or similar material on the land.

9.75 Section 16 of the Commons Act 2006 allows for the deregistration of Common Land. In determining the application to deregister land as common, the appropriate national authority shall have regard to:

- the interests of persons having rights in relation to, or occupying, the release land (and in particular persons exercising rights of common over it);
- the interests of the neighbourhood;
- the public interest;
- any other matter considered to be relevant.

9.76 The replacement land must be registered as Common Land to offset the loss.

the Metropolitan Commons Act 1866 (c. 122) of the Commons Act 1899 (c. 30), (c) land not falling within paragraph (a) or (b) which is in the New Forest and is subject to rights of commons.

10. Contribution to Energy Security and Tackling Climate Change

Renewable Energy Generation

- 10.1 To address the climate crisis, to ensure security and affordability of supply, and to achieve statutory Net Zero obligations the UK Government is resolute in its requirement for the rapid deployment of low-cost renewable energy.
- 10.2 The need is described as being “*urgent*” (NPS EN1, paragraph 3.1.1) and onshore wind is recognised as a key component of the transition to Net Zero; it being an established and low-cost solution as recognised by the Onshore Wind Taskforce Strategy.
- 10.3 Clean Power 2030 identifies the need to increase onshore wind capacity to 27-29GW by 2030 whilst NPS EN-1 highlights that all routes to a clean power system will require “*mass deployment*” of onshore wind (paragraph 2.3.5) and “*at a sharply accelerated scale and pace*” (paragraph 2.3.6) if the anticipated “*doubling of demand*” (paragraph 2.3.7) for electricity by 2050 is to be met.
- 10.4 The GMCA has published a Five-Year Environment Plan 2025-2030⁹⁹, which confirms one of the identified actions is to increase the capacity of large-scale renewable energy generation and storage (including onshore wind). The target for 2030 is to add 375MW renewable energy generation, equivalent to 103KtCO₂ of associated carbon savings based on a pathway up to 2038.
- 10.5 In response, the Proposed Development would have the capacity to generate at least 68.4MW of renewable energy, which equates to 9,131,564 MW hours of zero carbon electricity generation over its lifetime, sufficient to power 84,552 typical UK homes each year (based on 5.7MW rated turbines); the equivalent of 64.9% of the total number of homes (130,240) in Rossendale (32,770) and Rochdale (97,470) combined¹⁰⁰.
- 10.6 The Proposed Development would represent approximately 0.8% (as a minimum) to meeting the additional need (8.4GW) for capacity to achieve the Clean Power 2030 27GW target. It would also represent 18.24% of the GMCA 2038 target for renewable energy generation in Greater Manchester.
- 10.7 There is no requirement, in policy or legislation, for the applicant to demonstrate a “need” for the Proposed Development.
- 10.8 Notwithstanding, the Proposed Development would make a significant contribution to the delivery of the UK’s renewable energy targets providing energy directly to the National Grid (via Rossendale BSP). This alone is a significant benefit which should be

⁹⁹ [Greater Manchester Five-Year Environment Plan 2025–2030](#)

¹⁰⁰ Total number of dwellings per Local Authority identified from:
https://assets.publishing.service.gov.uk/media/668545157541f54efe51b926/CTSOP_summary_tables.xlsx

afforded **substantial positive weight** in the decision-making process, in accordance with NPPF Policy W3(1)(a).

- 10.9 Additional **substantial positive weight**, in accordance with NPPF Policy W3(1)(a), can be attributed to the consideration that the Applicant has secured an offer to connect the Proposed Development to the local electricity distribution network in 2029 and is therefore entirely aligned with objectives of Clean Power 2030. It is also instructive to note that in determining appeal reference APP/Q4245/W/22/3300299 the appointed Inspector noted and gave weight to the ability to connect the project to the electricity network within a relatively short time frame.

Climate Change

- 10.10 The potential effects of the Proposed Development on climate change (through reductions / savings in greenhouse gas emissions) have been considered in the EIA process and are reported in *Volume 1, Chapter 15 of the Environmental Statement*.
- 10.11 Quantifying GHG emissions, savings and net GHG effect of an onshore windfarm on peatland across its lifecycle is complex.
- 10.12 To ensure an objective assessment, SEPAs carbon calculator tool has been utilized. The tool quantifies carbon emissions, savings and the net GHG effect across the full project lifecycle and establishes the carbon payback period.
- 10.13 It utilises data specific to the Site and to the Proposed Development (i.e. peat depth and site design). The calculator adopts a number of worse case assumptions (which result in predicted GHG emissions during construction being recorded as higher than is likely in practice) including that all carbon stored in peat would be released to atmosphere following excavation whereas in practice the peat would be carefully handled and reused on site as part of site restoration proposals.
- 10.14 In addition, it is assumed that each turbine would have a rating of 5.7MW whereas following final turbine selection/procurement, turbines with higher ratings may be utilised. This results in the potential beneficial effects (in terms of GHG emission) savings are therefore understated within the calculator.
- 10.15 In order to minimise GHG emissions during construction, the design of the Proposed Development incorporates embedded mitigation in a number of areas: turbine locations mainly avoid areas of peat >1metre depth and floating road construction techniques will be used for access roads required to cross peat >1metre deep. An *Outline Peat Management Plan* has also been prepared which details how excavated peat would be excavated, stored, translocated and reused along with how any degraded peat would be restored – this would be further developed into a detailed Peat Management Plan prior to the commencement of construction following further site investigations and secured pursuant to a planning condition.
- 10.16 The assessment concludes that during construction total GHG emissions are expected to amount to 156,373 tCO₂e, equivalent to 78,187 tCO₂e per annum over the two-year

construction period¹⁰¹; a figure which represents a 'maximum' based on the worse case assumptions noted above.

- 10.17 Once the Proposed Development becomes operational, however, it would deliver 203,326 tCO₂e of GHG emission savings annually through the generation and utilisation of renewable electricity compared to fossil fuel generation (i.e. GHG savings).
- 10.18 Based upon the predicted construction stage GHG emissions and the operational stage GHG savings a maximum (i.e. worse case) pay-back period of 1.5 years is identified (for 5.7MW turbines) with the Proposed Development delivering net GHG emission savings over the subsequent c.38.5 years of operation. If higher rated turbines are utilised, the pay-back period would reduce further.
- 10.19 The contribution of the Proposed Development to reducing GHG emissions is, in its amended form greater than was proposed in the 2025 submission. This is assessed as being significant and this attracts **substantial positive weight** in the decision-making process in accordance with NPPF Policy W3(1)(a).

Policy Compliance

- 10.20 In the circumstances it can be considered that the Proposed Development, having regard to the contribution it will make to delivering national security of energy supply and to delivering net GHG emission savings during 38.5 years of operation (post the 1.5-year payback period). Whilst there will be a requirement to curtail the operation of some turbines in certain conditions to ensure compliance with ARWTN (see Section 13 – Noise), the impact of such curtailment on energy generation would be immaterial to the planning balance.
- 10.21 The Proposed Development is, in principle, entirely aligned with the objectives of the adopted Development Plan, specifically:
- Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough) and Policy ENV7 (Wind Turbines)
 - PFE Policies JP-S1 (Sustainable Development), JP-S2 (Carbon and Energy) and JP-S6 (Resource Efficiency)
 - Rochdale CS Policy G3 (Renewable and low carbon energy developments)
- 10.22 The Proposed Development is also, in principle, in compliance with the objectives of the following other material considerations each of which are highly supportive of the deployment of onshore wind and the delivery of renewable electricity.
- Clean Power 2030
 - Onshore Wind Taskforce Strategy
 - NPPF Policies W3, CC2 and DP3

¹⁰¹ This figure incorporates the decommissioning phase which cannot be disaggregated.

- NPS EN-1 and EN-3
- Climate Change PPG
- Renewable & Low Carbon Energy PPG
- Rossendale's Climate Change SPD
- Rochdale's Climate Change Adaptation SPD
- Lancashire 2050
- Whole System Smart Energy Plan: Greater Manchester

11. Wind Turbine Development

11.1 The principal policies of the adopted Development Plan relating to proposals for commercial scale onshore wind generation comprise:

- Rossendale LP Policy ENV7 (Wind Turbines); and
- Rochdale CS Policy G3 (Renewable and Low Carbon Energy Developments) (as amended by PfE Appendix A).

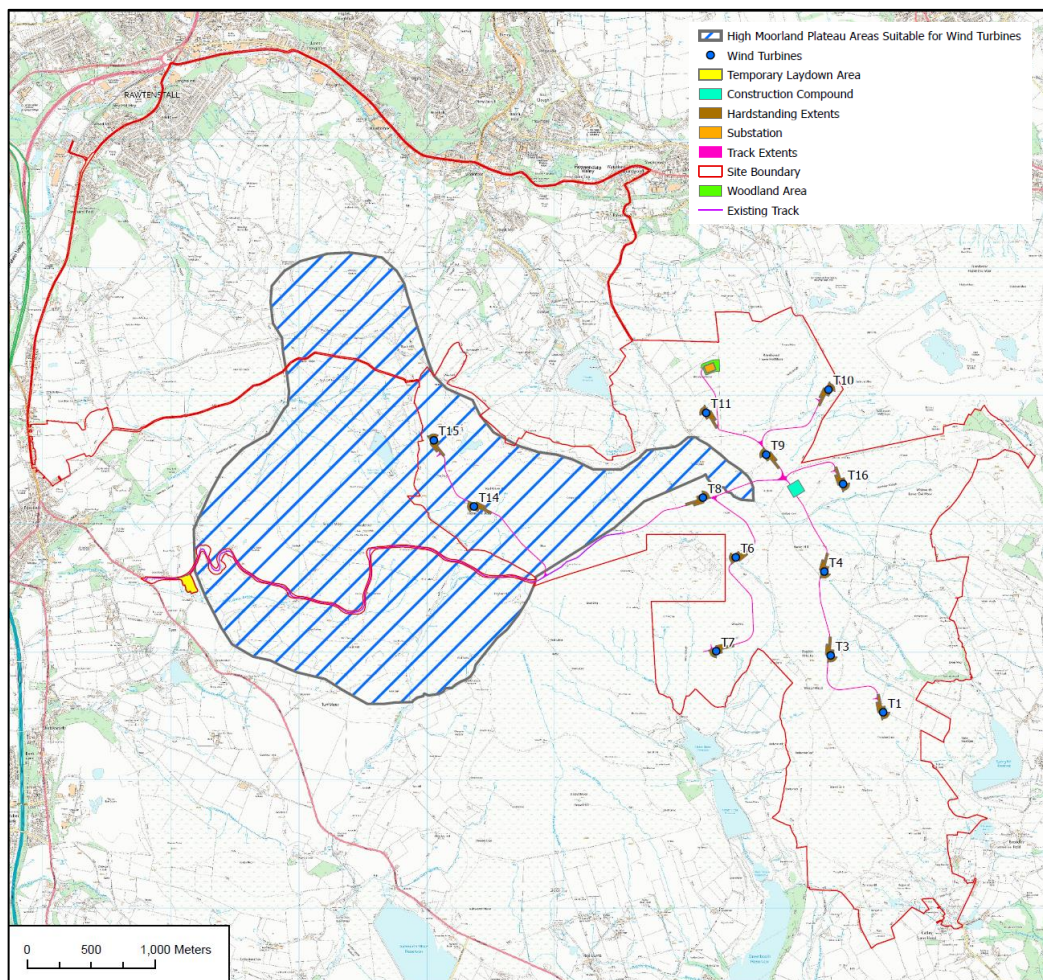
11.2 This Section provides an assessment of the Proposed Development against these policies, with reference to other sections of this PDAS and the wider Application documentation where relevant.

Rossendale LP Policy ENV7 (Wind Turbines)

Suitable Area for Commercial Scale Wind Turbines

11.3 The Site is partially located within an area identified on the Rossendale LP Policies Map as the “*High Moorland Plateau Areas Suitable for Wind Turbines*” (**Figure 11.1**).

Figure 11.1: High Moorland Plateau Areas Suitable for Wind Turbines



- 11.4 2no. of the 7no. wind turbines proposed within Rossendale (T14 and T15) and their associated crane pad hard standings are located within the defined High Moorland Plateau Area of Suitability.
- 11.5 Rossendale LP Policy ENV7 confirms that new large wind turbines may be considered in such areas, provided that areas of deep peat (over 40cm depth) and blanket bog are avoided and only supported if a defined list of criteria is addressed to the satisfaction of the Council.
- 11.6 Thereafter the Policy indicates that proposals for new wind turbines over 25 metres in height or the repowering of existing machines, outside these areas would be resisted. However, the Policy is internally inconsistent as it also requires that proposals for commercial scale wind turbines outside the defined areas demonstrate that the 'criteria' used for designating the High Moorland Plateau Area of Suitability are fully addressed in the proposals and that the separate list of criteria defined within the policy are addressed to the satisfaction of the Council.
- 11.7 Having regard to the above it is considered that the Rossendale LP Policy ENV7 is permissive of the development of commercial scale wind turbines both within and outside the defined High Moorland Plateau Area of Suitability subject to defined criteria being addressed to the satisfaction of the Council.
- 11.8 Furthermore, it is also relevant to acknowledge that NPPF Policy W3 confirms that where proposals for renewable energy development come forward outside areas which have been identified as suitable for such development, they should be acceptable when assessed against the national decision-making policies in the NPPF, taken as a whole. This is a significant material consideration in the drawing of the planning balance, as Rossendale LP Policy ENV7 is considered out of date due to inconsistency with national policy.

Assessment of Policy Compliance

- 11.9 As noted above, 2no. of the 7no. wind turbines (T14 and T15) proposed within Rossendale are located within the High Moorland Plateau Area of Suitability with the residual 5no. wind turbines (T4, T9, T10, T11 & T16) being located outside.
- 11.10 The following provides an assessment of the Proposed Development against the appraisal Criteria for Commercial Scale Wind Farms established in Rossendale LP Policy ENV7:
- The Application is supported by a range of supporting technical information such that it may be concluded that the list of criteria relating to proposals for commercial scale wind turbines within and outside the High Moorland Plateau Area of Suitability have been addressed in so far as reasonably possible having regard also to the national priorities relating to the deployment of such technology and available and secured grid connection and the available wind resource.
 - Matters relating to the potential effects to landscape character and visual amenity are fully addressed within *Volume 1, Chapter 11 of the Environmental Statement* (and summarised in Section 13 of this PDAS). It is acknowledged that

the Proposed Development would result in a range of effects, some of which would be significant and some of which would not. It is also acknowledged that some receptors may perceive these effects to be adverse. However, the effects are neither unusual or out of the ordinary for a scheme of this nature and to an extent are inevitable (as acknowledged within NPS EN-3) if national government objectives relating to the further deployment of onshore wind are to be realised. Having regard to those objectives and the benefits which stand to be realised the identified effects, which would be temporary and reversible, are infinitely preferable to the devastating long-term effects to landscape character which would arise if the causes of climate change are not addressed.

- There would be no unacceptable effects to neighbour amenity with respect to visual impacts, noise or shadow flicker:
 - The visual effects to individual residential properties are assessed where relevant within the *Residential Visual Amenity Assessment* (and summarised in Section 13 of this PDAS). No property would become an unattractive or undesirable place to live such that whilst the effect of the Proposed Development on some views from some properties may be significant it would not be unacceptable.
 - The effects of the Proposed Development on neighbouring properties in respect to noise are assessed in *Volume 1, Chapter 7 of the Environmental Statement* (and summarised in Section 13 of this PDAS). The Proposed Development would comply with ARWTN. It is concluded that effects would not be significant, nor would they be unacceptable.
 - *Volume 1, Chapter 8 of the Environmental Statement* (summarised in Section 13 of this PDAS) confirms that there would be no adverse effects to residential properties from shadow flicker following implementation of operational mitigation where required.
- The *Telecommunications Impact Assessment* confirms that there would no adverse effects in relation to telecommunication infrastructure.
- The *Aviation & Met Radar Impact Assessment* confirms the potential for some adverse effects to aviation related radar infrastructure and radar associated with the Hambledon Hill Meteorological Radar which is capable of mitigation (to be secured via planning condition). Discussions with the relevant stakeholders, including NATS, MAG and the Met Office, to confirm the preferred mitigation solution, are ongoing.
- There would be no effects from shadow flicker to users of public rights of way but some horses may be affected by the shadows which turbine blades cast across such routes (Shadow Cast). Shadow Cast would only occur at certain times of day under certain weather conditions, and its effect would depend on the temperament of an individual horse. Cubico will provide a series of wind farm familiarisation days for riders as has been provided at other wind farms to mitigate this effect such that it would not be unacceptable.

- The effects to protected species, designated species and other ecological assets are addressed within *Volume 1, Chapter 9 of the Environmental Statement* (and summarised in Section 13 of this PDAS). The effects would not be significant and have been minimised in so far as is reasonably possible. The submitted *Biodiversity Net Gain Assessment* confirms that the Proposed Development would deliver a 10.75% net gain for habitat units and 10.62% net gain for watercourse units, whilst the *Moorland Restoration & Management Plan* sets out how the proposals will restore extensive areas of degraded peat moorland.
- Effects to ground conditions, minerals and mining risk are addressed within the associated application reports¹⁰² (and summarised in Section 13 of this PDAS), and are concluded to be not significant, subject to mitigation measures which can be secured via planning condition.
- Effects to hydrology and hydrogeology are assessed within *Volume 1, Chapter 14 of the Environmental Statement* (and summarised in Section 13 of this PDAS). In summary this concludes that there would be minor adverse residual effects during both construction and operation to relevant receptors, but none of these would be significant.
- Effects on peatland are assessed within *Volume 1, Chapter 14 of the Environmental Statement* and the *Outline Peat Management Plan (OPMP)*, which are summarised in Sections 7 and 13 of this PDAS. In summary this assessment confirms that whilst there would be a minor adverse residual effect during construction, following the application of the measures proposed within the OPMP and MRMP, there would be a minor beneficial residual effect during operation of the Proposed Development (which includes a peat balance being achieved).

Whilst the Proposed Development does include infrastructure located on peat >40cm, the OPMP sets out how the avoidance mitigation hierarchy has been applied during the design phase and the overall conclusions are that there would be a beneficial effect on peatland as a result of the Proposed Development.

- The effects to heritage assets are addressed within the *Heritage Assessment (Volume 2, Appendix 12.1 of the Environmental Statement)* (and summarised in Section 13 of this PDAS). Identified effects would be less than substantial and not unacceptable having regard to substantial public benefits to be realised from the Proposed Development.
- The Proposed Development would deliver enhancements for access and recreation as detailed in the *Outdoor Access Enhancement and Management Plan* (and summarised in Section 7 of this PDAS). The use of PRoW would not be impeded by the Proposed Development. Whilst some users may perceive the impact of the turbines on views / experience as being adverse this effect has been mitigated in so far as reasonably possible. In the case of longer distance

trails the perceived adverse effects would only be experienced for a relatively small proportion of the overall route.

- 11.11 In consideration of the above it can be concluded that the individual criteria within Rossendale LP Policy ENV7 have been fully addressed by the Application such that the requirement of this element of the policy is satisfied with the sole exception of the requirement that no development takes place on peat with a depth greater than 40cm. The policy conflict which arises in this regard should be afforded **limited weight** when having regard to the wider benefits of the Proposed Development both in terms of the delivery of peatland restoration and the contribution to meeting the need for new onshore wind energy reflected in national policy (as detailed in Section 2 of this PDAS).

Location Suitability Criteria

- 11.12 As some of the proposed turbines within Rossendale are located outside the defined area of suitability it is also necessary to demonstrate that the 'criteria' used for designating the High Moorland Plateau Area of Suitability have been addressed within the Application for these elements.
- 11.13 In so far as the Applicant is aware, the criteria which RBC used to identify the High Moorland Plateau Area of Suitability do not exist or, in the alternative, are not in the public domain. Whilst the supporting text to the policy makes reference to the South Pennines Wind Energy Landscape Study by Julie Martin Associates (2014) the purpose and output of that study was to: define the inherent sensitivity of various landscape character types to wind turbine development generally; to judge landscape sensitivity of each LCT to different scale (height and number) of turbine development and to provide guidance to individual Councils and applicants as to principles for the design of wind energy schemes within those LCTs. The study **does not** define areas of suitability, and it is instructive to note that the extent of the High Moorland Plateau LCT within Rossendale is more extensive than the area of suitability identified in the adopted Rossendale LP. Furthermore, the study confirms that it does not provide a definitive statement on suitability and confirms that each proposal should be assessed on its own merits at a more granular level.
- 11.14 In the circumstances, it is not possible to demonstrate compliance or otherwise with this aspect of Policy ENV7 and as set out above, NPPF Policy W3 confirms that where proposals for renewable energy development come forward outside areas which have been identified as suitable for such development, they should be acceptable when assessed against the national decision-making policies in the NPPF, taken as a whole. This is a highly material consideration in the drawing of the planning balance, as Rossendale LP Policy ENV7 can now be considered out of date due to inconsistency with national policy. On this basis, the conflict with Rossendale LP Policy ENV7 should be afforded **no weight** in the planning balance.

Conclusion compliance with Rossendale LP Policy ENV7

- 11.15 Having regard to the above, it can be concluded that the Proposed Development complies with Policy ENV7 when considered as a whole.
- 11.16 Whilst an area of suitability for commercial scale wind turbines has been identified within the Rossendale LP this does not convey automatic support for commercial scale turbines within the designated area, nor does the policy preclude commercial scale

turbines outside the area. Rather, applications are required to demonstrate that a range of criteria have been addressed. This has been done and the recorded effects are considered acceptable. Regardless of this, NPPF Policy W3 confirms that proposals outside defined suitable areas should be assessed against the NPPF's decision-making policies and therefore this element of Policy ENV7 is regarded as out-of-date and is afforded no weight in the balance.

- 11.17 The individual criteria within Rossendale LP Policy ENV7 have been fully addressed by the Application such that the requirement of this element of the policy is satisfied. Although the development proposes infrastructure on peat with a depth in excess of 40cm (contrary to a criteria within the policy) this should be afforded neutral weight mindful of benefits of the Proposed Development in terms of delivering peatland restoration and contributing to the national need for new onshore wind energy as reflected in national policy (as detailed in Section 2 of this PDAS) and mindful of the fact that the requirements of Policy ENV7 in relation to development on peat are internally inconsistent¹⁰³.

Rochdale CS Policy G3 (Renewable and Low Carbon Energy Developments)

- 11.18 Rochdale CS Policy G3 is the principal policy relating to renewable and low carbon energy developments within Rochdale. It requires that proposals avoid harm to the health and safety of the public including through nuisance or highway safety considerations. For the reasons set out above and elsewhere within this PDAS the Proposed Development is supportive of these objectives, it being sensitively designed with appropriate mitigation where needed.
- 11.19 The policy also requires that harm to a similar range of receptors to those set out within Rossendale LP Policy ENV7 be minimised and mitigated. For the reasons set out above it is considered that the Proposed Development complies with this policy objective. Sensitive design has ensured that effects have been minimised in so far as reasonably possible relative to the strategic need to optimise energy generation from sites such as this and where necessary appropriate mitigation has been identified which is capable of being secured by condition or legal agreement.
- 11.20 Rochdale CS Policy G3 includes additional criteria which specifically relates to wind energy development indicating that permission will only be granted if the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan. Paragraph 10.18 of the supporting text to this policy confirms that *"in accordance with the written ministerial statement of June 2015, the Council intends to identify areas suitable for wind energy development in the Allocations DPD"*.
- 11.21 RMBC have not progressed the Allocations DPD and are instead commencing preparation of a new local plan to replace the Core Strategy and which will be consistent with PfE (operating as a 'Part 2' Local Plan). No such areas have been identified in the Publication Draft Rochdale Local Plan. Therefore, contrary to stated objectives at the time of the adoption of the CS, no areas of suitability have been

¹⁰³ Other parts of the policy require that development avoids peat >40cm depth.

applied and, on this basis, this element of Policy G3 cannot be applied, and attracts **no weight** in the planning balance.

Impacts Identified by the Local Community

- 11.22 Extensive public and stakeholder consultation has been undertaken in respect to the Proposed Development, both prior to the 2025 Submission and in response to the 2025 Submission, and this has informed the FEI Submission. The Applicant has sought to accommodate the requests and suggestions of the local community in so far as possible mindful also of the strategic national policy objective of maximising renewable energy generation – refer to the Statement of Community Involvement and the *You Said, We Heard, We Acted* document, as summarised in Section 5 of this PDAS.
- 11.23 Rossendale LP Policy ENV7 and Rochdale CS Policy G3 both establish a requirement for all wind farm proposals to demonstrate that the impacts identified by the local community have been taken into account and been “*fully addressed*”. The supporting text to Rossendale LP Policy ENV7 (paragraph 265) also confirms that this requirement is consistent with the Written Ministerial Statement (WMS) of June 2015 relating to wind farms¹⁰⁴.
- 11.24 However, the Applicant considers that the requirement for any identified impacts to be “*fully addressed*” is now inconsistent with national planning policy, as expressed in the NPPF (August 2026) and the UK Governments Policy Statement on onshore wind¹⁰⁵, and therefore this component of the policies is out-of-date. National policy now requires proposals for onshore wind to be considered in the same way as any other planning application, requiring the decision-maker to consider all material considerations relevant to the determination of the application and to make a balanced planning judgement. The NPPF (Annex A) explicitly confirms that the June 2015 WMS, as well as WMS from June 2013¹⁰⁶, December 2022¹⁰⁷ and September 2023¹⁰⁸ (in so far as they relate to onshore wind) are incorporated into the NPPF and therefore no longer represent up-to-date government policy.
- 11.25 In the circumstances it is considered that this policy requirement should attract **no weight** in the decision-making process. Notwithstanding, it is considered that the application has met the policy requirements in any event in so far that the effects identified by the local community have been addressed within the submission.

¹⁰⁴ Written Statement made by Secretary of State for Communities and Local Government (Greg Clark) on 18 June 2015. Available here: [1-DCLG-Planning.pdf](#)

¹⁰⁵ [Policy statement on onshore wind - GOV.UK](#)

¹⁰⁶ Written Statement made by Secretary of State for Housing, Communities and Local Government (Eric Pickles) on 06 June 2013. Available here: [Local planning and onshore wind - GOV.UK](#)

¹⁰⁷ Written Statement made by Secretary of State for Levelling Up, Housing and Communities (Michael Gove) on 06 December 2022. Available here: [Written statements - Written questions, answers and statements - UK Parliament](#)

¹⁰⁸ Written Statement made by Secretary of State for Levelling Up, Housing and Communities (Michael Gove) on 05 September 2023. Available here: [Written Statements - Hansard - UK Parliament](#)

12. Economic & Social Benefits

- 12.1 The Site is situated in an area of economic and social need. The local economies of Rossendale and Rochdale face structural challenges, contain areas of significant deprivation and are expected to grow more slowly than national and regional comparators.
- 12.2 The *Economic and Social Benefits Statement*, which is provided as part of the Application, identifies that Rochdale and Rossendale are the 19th and 60th most deprived boroughs nationally, respectively, and summarises data showing that both boroughs perform below national averages across metrics such as economic activity, employment, and productivity.
- 12.3 The Proposed Development will make a significant contribution to addressing these challenges conveying significant economic and social benefits over a sustained period to Rossendale and Rochdale, Lancashire and Greater Manchester, the wider North West region and nationally.

Economic Benefits

- 12.4 The *Economic and Social Benefits Statement* presents the quantified economic impacts estimated to be generated by the Proposed Development across three phases:
- Pre-Development Phase: this includes the project design, environmental studies, legal agreements, funding and planning consent, which are estimated to last 4no. years.
 - Construction Phase: this includes preparation of the Site, manufacturing and installation of the turbines, balance of plant and establishing grid connections, which is estimated to last 2no. years.
 - Operation & Maintenance (O&M) Phase: this will include the O&M of the Proposed Development over a 40-year period.
- 12.5 The following section provides a summary of the key economic benefits arising during each of these phases, including the benefits to be experienced by residents of Rossendale and Rochdale.

Pre-Development Phase

- 12.6 During the 4-year pre-development phase, the following economic benefits will be generated:
- **£3.4 million** total investment.

- **Five** net additional person-years¹⁰⁹ of employment for residents of Rossendale and Rochdale. In total there would be 25 net additional person-years across the UK, inclusive of 15 in the North West.
- **£1.8 million** GVA¹¹⁰ boost to the economies of Rossendale and Rochdale. In total the Proposed Development would generate £2.1 million in GVA for the UK economy, including £1.9 million in the North West.

Construction Phase

12.7 During the 2-year construction phase, the following economic benefits will be generated:

- Between **£95.0 - £100.6 million** total investment.
- **75-80** net additional person-years of employment for residents of Rossendale and Rochdale, which equates to **35-40** full-time equivalent ('FTE') jobs. In total there would be 245-260 net additional person-years of employment across the UK, inclusive of 220-235 in the North West. This equates to 120-130 FTE jobs in the UK inclusive of 110-115 FTE jobs in the North West.
- Between **£14.8-£15.6 million** GVA boost to the economies of Rossendale and Rochdale. In total the Proposed Development would generate between £18.9-£20.0 million in GVA for the UK economy, including between £17.9-£18.9 million in the North West.

Operation and Maintenance (O&M) Phase

12.8 During the 40-year O&M phase, the following economic benefits will be generated:

- Between **£32.6-£34.6 million** total investment.
- **40-45** net additional person-years of employment for residents of Rossendale and Rochdale. In total there would be 90-95 net additional person-years of employment across the UK, inclusive of 60-65 in the North West.
- Between **£9.7-10.3 million** GVA boost to the economies of Rossendale and Rochdale. In total the Proposed Development would generate between £12.7-13.4 million in GVA for the UK economy, including between £10.8-11.4 million in the North West.
- Between **£580,000 - £610,000** in business rates contribution per year, for the first five years of operation (to be reviewed after 2031), contributing towards the funding of public services and infrastructure in Rochdale, Rossendale and beyond.
- Once operational the **Community Wealth Fund** will be launched, which will involve developing Local Action Plans, to tailor the funding approach to best respond to identified local need at the time of delivery. This will provide ongoing

¹⁰⁹ Defined as the total employment required to deliver the Proposed Development across that phase of development.

¹¹⁰ Gross Value Added

financial support for the community. In response to feedback from the community this will be independently managed by a dedicated charity, to ensure fair distribution, transparency and lasting long-term benefits for the community, and managed by those who understand the local issues and needs best. To ensure a degree of accountability and transparency, oversight of the process will be undertaken by the Community Liaison Group, to ensure that Cubico delivers on these commitments, as well as maintaining a positive relationship with local stakeholders, and responding to local needs and issues. Linked to a revenue sharing mechanism, the Community Wealth Fund will guarantee that communities will receive a minimum £408,000 per year¹¹¹ (£6,000 **£6,000 per MW of installed capacity per annum**), or 3% of gross project revenue – whichever is greater – with payments linked to inflation and rising over time. In high-yield years therefore, the community would benefit from the upside in revenue, and in lower-yield years, Cubico would guarantee the minimum payment. At this stage, the eligibility criteria are yet to be determined, however this will be developed through the governance arrangements of the managing charity referenced above, this will ensure it is sufficiently flexible to respond to changing priorities and needs of the local area, in a fair and transparent manner, at the time of delivery. Whilst the provision of a Community Wealth Fund is actively encouraged by the UK Government¹¹², it attracts no weight in the planning balance¹¹³.

- 12.9 In considering that the context is a local area which lags behind economically and evidences higher levels of deprivation and economic inactivity relative to other parts of the country, the benefits highlighted above, which will be realised locally by residents of Rossendale and Rochdale, become even more important and gain even more significance.

Community Benefits

- 12.10 In addition to the quantifiable economic benefits, the Proposed Development will also deliver further wide-ranging social benefits, which will generate long-term positive outcomes on the overall health, wellbeing and resilience of individuals, local communities and society as a whole.
- 12.11 Cubico has developed a 'Community Benefits Charter' for Scout Moor II¹¹⁴ which sets out the clear community benefit commitments being made to communities surrounding the Site. It provides the framework through which the Proposed Development's social value ambitions will be delivered, ensuring a positive and lasting

¹¹¹ Based on a total output of 68MW

¹¹² The Applicant acknowledges the Working Paper published by DESNZ in July 2025 in respect of Community Benefits and Shared Ownership for Low Carbon Energy Infrastructure (Available: [Community Benefits and Shared Ownership for Low Carbon Energy Infrastructure: working paper](#)) which sets out proposals for the introduction of a mandatory community benefits scheme and/or shared ownership of renewable energy infrastructure. The Applicant will have regard to this emerging national policy throughout the construction and operation of the Proposed Development and adjust its approach if and as necessary.

¹¹³ In accordance with the Supreme Court's ruling in [Wright, R \(on the application of Wright\) v Resilient Energy Severndale Ltd & Anor - \[2019\] UKSC 53 \(20 November 2019\)](#).

¹¹⁴ Enclosed at Appendix 1 of the Economic & Social Benefits Statement

socio-economic and environmental legacy for Rochdale, Rossendale, and the wider area.

12.12 At its core, the Charter makes three overarching commitments:

- **Engaging the Community with Transparency** – ensuring that local voices help shape the project and guide key decisions through open, honest engagement.
- **Investing in the Community at Every Stage** – including the establishment of the Scout Moor Development Trust; an independent organisation to manage and administer the Community Wealth Fund. This will direct long-term financial support into the communities most impacted by the wind farm. The fund will be independently managed, and a Community Liaison Group (CLG) – secured through planning conditions – will ensure Cubico’s commitments are upheld with community-led oversight and transparency.
- **Creating Local Opportunities** – supporting local businesses to provide apprenticeships, training, and economic growth close to home.

12.13 These commitments are underpinned by a series of initiatives which are set out in detail in the *Economic and Social Benefits Statement* submitted with the Application.

12.14 Amongst other things these initiatives include: the provision of voluntary time within the local community by Cubico and appointed contractors / supply chain partners; the delivery of enhancements to access and recreation provision within the Site and wider area; the production of an Employment and Skills Plan (which will establish targets for local recruitment, the creation of apprenticeships and utilisation of local businesses within the supply chain), the delivery of a programme of education and careers engagement through collaboration with local schools and colleges. The following table provides a summary of these initiatives and the means of delivery.

Table 12.1: Community Benefit Initiatives & Delivery Mechanisms

Initiative	Delivery Mechanism
Continued engagement with the local community	Planning condition to deliver commitment set out in the Community Benefit Charter to support ongoing community engagement. This will include undertaking, or establishing: • Updating of public communication channels • A Community Liaison Group (CLG) • Annual Impact Reporting
Monetary Funding for local communities during all phases of development. This includes the Construction Impact Fund and Community Wealth Fund	Cubico will work with the local community, including the Community Liaison Group (CLG) referenced above once established, to establish and distribute the identified monetary funds. This recognises that these funds are not a material planning consideration and cannot be secured through planning conditions or S106.

Provision of volunteering time from the Applicant and Contractors	Binding commitment documented in the Community Benefit Charter
Delivery of proposals within the <i>Outdoor Access Enhancement and Management Plan</i> to improve health, wellbeing and access to green space	On-Site Scheme Design/ Planning Condition
Delivery of proposed enhancements to the natural environment set out in the <i>Biodiversity Net Gain Assessment and Moorland Restoration & Management Plan</i> .	On-Site Scheme Design/ Planning Condition
Sustainable Construction practices.	Planning condition to produce and align with the requirements of, a Construction Environmental Management Plan (CEMP)
Prioritising employment opportunities for local people.	Planning condition to produce, and align with, the requirements of an Employment and Skills Plan (ESP), which will include a monitoring and evaluation framework
Supporting skills, training and apprenticeship opportunities.	
Utilising local businesses as part of the supply chain.	
Delivering education and careers engagement sessions for local schools, colleges and community groups.	Binding commitment documented in the Community Benefit Charter

- 12.15 The opportunities the Proposed Development will create for learning, education and employment are substantial and should be given significant weight. Employment is widely recognised as one of the most significant factors in terms of a person's health and wellbeing. The social impact of employment is far reaching and has benefits at both the individual and wider societal level, shown clearly by the fact that the NHS's HUDU (Healthy Urban Development Unit) consider access to employment and training opportunities as a 'primary determinant' of health¹¹⁵. A person's employment status can also impact on other health determinants, such as physical activity, and other lifestyle choices. Health expenditure on an unemployed person is estimated to be double the average expenditure per person, demonstrating the fact that an individual's overall physical and mental health and wellbeing is strongly associated with being in meaningful employment¹¹⁶.

Policy Compliance

- 12.16 These significant benefits align fully with policies referred to in Sections 2 and 9 of this PDAS, in particular:

¹¹⁵ As confirmed at Paragraph 8.31 of the *Economic and Social Benefits Statement*.

¹¹⁶ As confirmed at Paragraph 8.32 of the *Economic and Social Benefits Statement*.

- The ambition and objectives of the Plan for Change¹¹⁷ which establishes an ambition to '*make Britain a clean energy superpower*', accelerating the path towards net zero emissions, as well as energy security and to '*kickstart economic growth*', acknowledging that this should be felt across the country through good jobs, higher living standards and productivity.
- The economic objective of sustainable development set out at NPPF Chapter 1, Paragraph 17, which seeks to build a strong, responsive and competitive economy.
- The intention to create the conditions in which business can invest, expand and adapt, established under NPPF Chapter 7. The NPPF confirms that substantial weight should be placed on economic benefits of proposals for commercial development, especially where this would support the economic vision and strategy for the area and the implementation of the Industrial Strategy (which includes renewable energy generation).
- The priorities recognised in Lancashire County Council's (LCC) Lancashire 2050¹¹⁸ strategy, which include seeking to increase energy generation from low carbon sources, including renewables, and to subsequently grow the low carbon and environment sectors of Lancashire's economy. Development of the sector is also recognised as being core to economic prosperity and increased investment in the region.
- The ambitions set out in the Whole Systems Smart Energy Plan for Greater Manchester¹¹⁹ and the Greater Manchester Five Year Environment Plan¹²⁰ which set out the ambition for the region to play a leading role in the low energy transition and collectively establish a commitment for homes, businesses and transport to be powered through renewable energy, built all over Greater Manchester (including onshore wind), to reduce transmission losses, and afford more control over energy bills.
- The economic objectives set out within the Rossendale LP, under Policy SD1 (Presumption in favour of Sustainable Development), which seeks to secure development that improves the economic, social and environmental conditions in the area.
- The ambition established in the Economic Development Strategy for Rossendale¹²¹, which aims for Rossendale's economy to show strong and sustainable growth, with high levels of investment and for residents to benefit from improved life chances and enhanced employment and skills opportunities. A particularly relevant priority is to work alongside the East Lancashire Chamber of Commerce to support the expansion of the renewable energy sector locally,

¹¹⁷ UK Government (December 2024), Plan for Change: Milestones for a mission-led government

¹¹⁸ Lancashire County Council (2023), Lancashire 2050

¹¹⁹ Greater Manchester Combined Authority and Department for Business, Energy and Industrial Strategy (2019), SSH Phase 2, D40: Whole System Smart Energy Plan- Greater Manchester

¹²⁰ Greater Manchester Combined Authority (December 2024), Five Year Environment Plan (2025-2030)

¹²¹ Rossendale Borough Council (2018), Economic Development Strategy for Rossendale 2018-2033

and to identify income generation opportunities, and to improve educational attainment and vocational skills to match the demands from industry.

- The economic objectives set out within the Rochdale CS, under Policies SP1 (Rochdale borough's role in the city region) and SP2 (The Spatial Strategy for the borough), which include promoting the Borough as an attractive location for employment growth and focusing employment development so that it supports the overall economic growth of the Greater Manchester sub region.
- The aims of PfE Policy JP-J1 (Supporting Long-Term Economic Growth) to maintain a very high level of economic diversity and facilitate the development of high value clusters within various sectors, including logistics, advanced manufacturing, digital and cyber, health innovation and low carbon goods.
- The aims of PfE Policy JP-Strat 6 (Northern Areas) to significantly increase the competitiveness of the northern areas of Greater Manchester and reduce deprivation through the provision of new employment opportunities.

Conclusion

- 12.17 In consideration of the above it is clear that the Proposed Development will deliver a wide range of social, environmental and economic benefits which will be felt directly with Rossendale and Rochdale and which will also impact the wider North-West and UK economy.
- 12.18 The Proposed Development will amongst other things: generate a substantial level of GVA; deliver access to opportunities for training and education; deliver access to skilled employment for local people; support local businesses within the supply chain ecosystem; generate significant levels of additional revenue for the local authorities (funds which can support enhanced levels of public service provision), facilitate improved access for recreation to the benefit of health and wellbeing, support community led projects through a very substantial Community Wealth Fund and assist the transition to a low carbon economy in accordance with a range of local and national policies and strategic objectives.
- 12.19 These socio-economic benefits are substantial and, in the context of Rochdale and Rossendale being high levels of deprivation and economic inactivity relative to other parts of the country, should be afforded substantial positive weight in the decision-making process as advised by NPPF Policies W3 & E2.

13. Design, Environment & Amenity

- 13.1 The preceding section has appraised the Proposed Development against the principal policies of the respective Development Plans relating to onshore wind. This section addresses all other matters considered material to the planning balance. The technical documents and *Environmental Statement* which are submitted alongside the Application have assessed the impact of the Proposed Development in respect of all relevant technical and environmental issues. The content and findings of these assessments is summarised thematically below, in the context of relevant policies of the Development Plan and other material considerations as summarised in Section 9 and **Appendix 1** of this PDAS.

Design & Layout

Assessment

- 13.2 The approach to defining the design and layout of the Proposed Development is set out in detail in Sections 6 and 7 of this PDAS and is not replicated here.
- 13.3 In summary, the design and layout of the Proposed Development has responded to detailed assessments of the Site, seeking to balance the need to optimise renewable energy generation from the Site mindful of available wind resource and grid connection with the sensitivities presented by various environmental constraints including landscape character and visual amenity.

Policy Compliance

- 13.4 The Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to design and layout:
- Rossendale: Rossendale LP Strategic Policies Strategic Policy SS (Spatial Strategy) and ENV1 (High Quality Development in the Borough), as well as Policies ENV3 (Landscape Character and Quality), ENV4 (Biodiversity, Geodiversity and Ecological Networks), ENV5 (Green Infrastructure Networks) and ENV7 (Wind Turbines).
 - Rochdale: PFE Policies JP-P1 (Sustainable Places), JP-G5 (Urban Green Space) and JP-C5 (Streets for All) and Rochdale CS Policies P1 (Improving Image), P2 (Protecting and Enhancing Character, Landscape and Heritage), P3 (Improving Design of New Development), DM1 (General Development Management Requirements) and G3 (Renewable and Low Carbon Energy Developments).
- 13.5 The Proposed Development is also in full compliance with the following other material considerations:
- NPPF Policies DP3 and DP4
 - Design: Process & Tools PPG
 - Renewable & Low Carbon Energy PPG

- NPS EN-1 Section 4.7
- NPS EN-3 Paragraphs 2.12.29 – 2.12.33
- Rochdale's Design & Planning Progress: A Guide to Good Practice SPD, Urban Design SPD and Public Realm Design Guide

Landscape Character & Visual Impact

Assessment

Landscape & Visual Impact Assessment

- 13.6 The potential effects of the Proposed Development on landscape character and visual amenity have been considered as part of the EIA process with the results reported within *Volume 1, Chapter 11 of the Environmental Statement*.
- 13.7 The assessment presented within the *Environmental Statement* is, necessarily, complex and of considerable length. Its findings have been reviewed in detail to inform the preparation of this PDAS and the drawing of the overall planning balance.
- 13.8 In the interests of brevity, it is not considered necessary or appropriate to present a lengthy recital of the findings of the landscape and visual impact assessment (LVIA). Instead, what is presented below represents a summary of the key points of relevance for determination of the Application. It is necessary for the LVIA to be read in full for a complete understanding of predicted effects to be obtained.
- 13.9 The LVIA sets out the baseline conditions of the Site, which in summary include:
- Situated within National Character Area (NCA) 36: Southern Pennines
 - Situated within Local Character Area (LCA) A1: South Pennine Moors and LCA 24: Knowl and Rooley Moors, Fringes and Foothills.
 - The Site itself is not located within a National Park, however, the Peak District National Park (NP) lies 16.9km south-east of the Site at its closest point.
 - The Forest of Bowland National Landscape lies 17.8km north-west of the Site.
 - The Site is not located within a designated regional or local landscape.
- 13.10 A series of primary, tertiary and secondary mitigation measures have been identified for both the construction and operational stages of the Proposed Development to mitigate potential adverse effects. This includes the adopted design approach (summarised in Section 6 of this PDAS), including the steps taken to remove or relocate infrastructure which could have impacts on relevant landscape and visual receptors. It also includes the time-limited (40 years) and reversible nature of the Proposed Development; the implementation of the MRMP and OAMEP; and a reduced aviation lighting scheme.
- 13.11 Following the implementation of these mitigation measures, the Proposed Development will result in various residual effects across the construction and

operational phases, some of which are identified as being 'significant' in EIA terms, as presented in full within the LVIA.

- 13.12 It is material to the consideration of the Applications that this FEI Submission represents a betterment in comparison to the 2025 Submission. The main difference is the noticeable reduction in the number and density of turbines visible in key views, with less turbines seen in every viewpoint and a reduction in the 'stacking' effect of turbines in views. This includes the removal of turbines T12 and T17 which has reduced visual impacts to the north (particularly in Cowpe and Bacup), as well as the removal of turbines T2 and T5 which has reduced visual impacts to the east (particularly in Whitworth). The lateral extent and scale of turbines (in terms of tip height), and therefore the overall pattern of visibility, has not changed, so the levels of effect presented within *Volume 1, Chapter 11 of the Environmental Statement* have remained the same.

Residential Visual Amenity Assessment

- 13.13 A *Residential Visual Amenity Assessment* (RVAA) has also been produced as part of the Application.
- 13.14 In accordance with the Landscape Institute's guidance¹²² 'residential visual amenity' is taken to mean *"the overall quality, experience and nature of views and outlook available to occupants of residential properties, including views from gardens and domestic curtilage"*.
- 13.15 The purpose of the RVAA is to consider whether the Proposed Development would be so 'oppressive' or 'overbearing' at any residential property that when judged objectively in the round the resulting visual effect would widely be regarded to render any property an 'unpleasant' or 'unattractive' place to live.
- 13.16 In summary, the RVAA confirms:
- Within a 2km radius of any proposed turbine there are 3,977 registered addresses according to Land Registry records, although not all of these are residential properties. Only four residential dwellings would lie within 1km of a proposed turbine, namely: Heights Farm (approximately 970m to the north); Sheephouse Fold; and Sheephouse Farm (both approximately 940m to the north); Lowerfold Barn (980m to the north); Willowfield Barn (960m to the north); and Old Cowpe Hall (980m to the north).
 - Of the 24 representative residential properties assessed in detail in the RVAA (which included the four closest properties and those within 2km where the highest magnitude of visual effect is likely to occur), most (22 properties) would experience a major adverse effect on views. There would be some notable exceptions such as Sheephouse Barn and Sheephouse Farm where only the tips of two turbine blades would be visible due to steeply rising landform to the rear of

¹²² Paragraph 1.2, Technical Guidance Note (TGN) 2/19: Residential Visual Amenity Assessment (RVAA) (Landscape Institute, March 2019). Available: [tgn-02-2019-rvaa.pdf](#)

these properties. At these two properties the effect on visual amenity would not be significant.

- In no instance would the proposed turbines be present in such number, size, layout, proximity and movement as to represent an overwhelming and unavoidable presence in the main views of any of the representative residential properties. As these 24 properties include the closest properties and those which are likely to experience the highest magnitude of effect on visual amenity, it is considered these properties can be taken as representative of the 'worst case' scenario in terms of residential visual amenity.
- When considered objectively in the round, it is the professional opinion of Stephenson Halliday that no property would experience a visual effect which was so oppressive or overbearing that it would be widely regarded to become an unpleasant or unattractive place to live. Whilst the visual effect in several cases would be Major, it would not be sufficient to breach the Residential Visual Amenity Threshold.

Conclusion on Landscape Character & Visual Impact

- 13.17 The residual effects to landscape character and visual amenity (including residential visual amenity) are factored into the planning balance, conducted at Sections 14 and 15 of this PDAS.
- 13.18 The totality of harm to landscape character is afforded **substantial weight** in the planning balance, in accordance with NPPF Policy N4(1), however, this is in the context of the sensitive approach to layout and design of the Proposed Development (summarised in this PDAS) which is not located within a Protected Landscape and wholly accords with NPPF Policy N4(4). The totality of harm to visual amenity is afforded **moderate weight** in the planning balance.

Policy Compliance

- 13.19 The likely occurrence of significant landscape and visual effects from commercial scale wind energy schemes is explicitly acknowledged within NPS EN-1 (Section 5.10) and NPS EN-3 (Section 2.12), in the context of national policy support for onshore wind.
- 13.20 The identified effects are not in any way unusual or out of the ordinary. It is inconceivable that the national policy objectives relating to the "mass deployment" of onshore wind and the levels of energy generation sought from onshore wind can be achieved without significant effects to landscape character and visual amenity arising and, in this regard, it is to be noted that those effects would be entirely reversible upon decommissioning. Overall, the degree of landscape and visual effect is of an acceptable level relative to the urgent need for renewable energy generation and the substantial benefits which stand to be derived from the Proposed Development.
- 13.21 In view of the above findings, it may be concluded that the Proposed Development is compliant with the following Development Plan policies on the basis that whilst some

significant landscape and visual effects arise these are not considered to be “unacceptable”¹²³:

- Rossendale: ENV7 (Wind Turbines)
- Rochdale: Rochdale CS Policy G3 (Renewable and Low Carbon Energy Developments)

13.22 Notably these policies are specific to proposals for wind energy developments and other forms of renewable / low carbon energy and so considered to be the primary policies for decision making purposes.

13.23 The Proposed Development is also considered to comply with the following Development Plan policies, in so far as they relate to landscape character and visual amenity (including residential visual amenity):

- Rossendale: Rossendale LP Strategic Policy SS (Spatial Strategy) and Policies ENV3 (Landscape Character and Quality) and ENV6 (Environmental Protection)
- Rochdale: PFE Policies JP-G1 (Landscape Character) and JP-P1 (Sustainable Places), as well as Rochdale CS Policy P2 (Protecting and enhancing character, landscape and heritage)

13.24 It is accepted however that a conflict with part of Rochdale CS Policy DM1 (General Development Management Requirements) arises on the basis that this policy seeks to ensure that development does “... *not adversely affect amenity of residents or users through visual intrusion* ...”. It is to be noted however that the policy is a general development management policy and that the conflict arises because the policy sets a very high bar of acceptability by seeking to avoid any adverse effects. This is in contrast to Rochdale CS Policy G3 which is specific to low carbon energy proposals and which requires that adverse effects be minimised and mitigated and with which compliance is achieved. In consideration of the above and the reversible nature of the effects this policy conflict attracts neutral weight.

13.25 NPPF N2(1)(a) confirms that new development should “*consider the environmental qualities of land proposed for development, including habitats, landscape character and the natural beauty of the countryside, and identify opportunities for those qualities to be conserved or enhanced (including through requirements for biodiversity net gain where these apply)*”. The Proposed Development includes measures to improve biodiversity (in excess of the statutory 10% requirement) and restore the degraded moorland (via the MRMP), contributing to landscape restoration and enhancement.

13.26 NPPF Policy N4(1) confirms that “...*substantial weight should be placed on the importance of conserving and enhancing the natural beauty of...*” Protected Landscapes, which includes National Parks and National Landscapes. NPPF Policy N4(4) confirms that “*development proposals within the setting of Protected Landscapes should be sensitively located and designed to avoid or minimise adverse impacts on*” a Protected Landscape. The LVIA confirms that there will be a moderate / minor adverse

¹²³ These policies generally seek to avoid the occurrence of unacceptable effects.

residual effect to the special qualities of the Peak District National Park and to the Forest of Bowland National Landscape following mitigation, but that these effects are not significant. As set out in Section 6 of this PDAS and within the LVIA, the Proposed Development has been sensitively designed to avoid and minimise adverse impacts on Protected Landscapes. On this basis it is considered to comply with NPPF Policy N4 (4).

13.27 On the basis of the above, the Proposed Development is also considered to comply with the following other material considerations, in so far as they relate to landscape character and visual amenity (including residential visual amenity):

- NPPF Policies N2(1), N4(1) and N4(4)
- Renewable & Low Carbon Energy PPG (Paragraphs 022-023)
- Natural Environment PPG (Paragraphs 036-043)
- NPS EN-1 (Sections 4.7 and 5.10)
- NPS EN-3 (Section 2.212)

Built & Cultural Heritage

Assessment

13.28 An assessment of the potential impact of the Proposed Development on designated and non-designated heritage assets and other assets recorded on the Local Authority 'Local Lists' and the Historic Environment Record has been completed with the results reported within the *Heritage Assessment (Volume 2, Appendix 12.1 of the Environmental Statement)*.

13.29 All designated heritage assets¹²⁴ within 15km of the Site and all non-designated heritage assets within 5km were identified¹²⁵. Only those assets with the potential to be affected by the Proposed Development were assessed in detail.

13.30 The assessment concludes that the Proposed Development would give rise to harm to:

- 3no. Conservation Areas, 1no. at a low level and 2no. at a medium/moderate level.
- 1no. RPG, at a low level.
- 17no. listed buildings, with the harm ranging from a very low level to a medium/moderate level.
- 9no. Non-Designated Heritage Assets, all at a low level.

13.31 In consideration of the scale of the Proposed Development, its spatial extent and the number of designated and non-designated heritage assets identified within the defined

¹²⁴ Conservation Areas, Listed Buildings and Scheduled Ancient Monuments

¹²⁵ Within the defined study area a total of 92 Conservation Areas, 46 Scheduled Monuments, 2,716 listed buildings (22 Grade I; 129 Grade II*; 2,565 Grade II), 22 Registered Parks and Gardens and numerous non-designated heritage assets were identified.

study areas it can be concluded that, in overall terms, the potential impact of the Proposed Development is relatively limited, with no instances of harm being ‘substantial’ as per the NPPF.

- 13.32 It is material to the consideration of the Applications that this FEI Submission represents a betterment in comparison to the 2025 Submission. The main difference is the noticeable reduction in the number and density of turbines visible in key views, with fewer turbines seen in every viewpoint and a reduction in the ‘stacking’ effect of turbines in views. This includes the removal of turbines T12 and T17 which has reduced visual impacts to the north (particularly in Cowpe and Bacup), as well as the removal of turbines T2 and T5 which has reduced visual impacts to the east (particularly in Whitworth). The lateral extent and scale of turbines (in terms of tip height), and therefore the overall pattern of visibility, has not changed, so the levels of effect presented within *Volume 1, Chapter 12 of the Environmental Statement* has remained the same.

Heritage Balance

- 13.33 Completion of the *Heritage Assessment* is intended to assist the Councils in addressing the statutory duties under Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. These duties include the requirement to pay special regard to the desirability of preserving listing buildings, their setting and any features of special interest they may possess¹²⁶ and to pay special attention to the desirability of preserving or enhancing the character and appearance of a conservation area¹²⁷.
- 13.34 Case law has confirmed that Parliament’s intention in enacting s66(1) was that decision-makers should give considerable importance and weight to the desirability of preserving the special interest and setting of listed buildings, where ‘preserve’ means ‘to cause no harm’. The High Court has indicated that the proper application of the NPPF policies discharges the statutory duties.
- 13.35 NPPF Policy HE6(4) is engaged, which states the following:

“Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal”.

- 13.36 NPPF Policy HE7(2) is also engaged, which states the following:

“Where a development proposal would harm the significance of a non-designated heritage asset, this should be weighed against the benefits of the proposal and a balanced judgement made, having regard to the scale of any harm or loss and the significance of the non-designated heritage asset”.

- 13.37 PPG confirms that public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in Chapter 1, Paragraph 17 of the NPPF.

¹²⁶ S66(1) Planning (Listed Buildings and Conservation Areas) Act 1990

¹²⁷ S72(1) Planning (Listed Buildings and Conservation Areas) Act 1990

- 13.38 The NPPF is also clear that in applying ‘substantial weight’ to the conservation of heritage assets, the more important the asset, the greater the weight should be, irrespective of the level of harm. The Grade II* listed status of the Church of St Nicholas with St John should therefore be taken into consideration.
- 13.39 It is necessary, therefore, for the identified harm to be given substantial weight in the decision-making process (having regard to the statutory duties outlined above). In doing so regard has also been had to the substantial public benefits which stand to be delivered through the construction and operation of the Proposed Development. Those public benefits are outlined in full in this PDAS and include the generation of sufficient electricity to meet the domestic needs of 84,552 typical UK homes, the contribution the Proposed Development will make to reducing GHG emissions and tackling the cause of climate change and the delivery of an extensive moorland and peatland restoration programme to the benefit of carbon sequestration, landscape quality, biodiversity, flood risk and water quality. The Proposed Development will also deliver improved access and recreation opportunities to and on the moorland, as well as opportunities for education, employment and skills training. In accordance with Paragraph 83 of Historic England’s Advice Note 15¹²⁸, public benefits also include “archaeological investigation, social prescribing and nature or landscape recovery”, which are provided through the Proposed Development through a commitment to pre-construction archaeological investigation (secured via condition), which will provide opportunities for the local community to engage in historical activities, as well as the restoration of the peat moorland.
- 13.40 These public benefits are, together, substantial and based on the findings of the detailed *Heritage Assessment*, are considered to materially outweigh the degree of harm which has been identified to the significance of the designated and non-designated heritage assets. This conclusion acknowledges the special regard required by section 66(1) of the LBCA Act and reflects the balancing exercise required in NPPF Policies HE6(4) and HE7(2).

Policy Compliance

- 13.41 The Proposed Development is in full compliance with the following Development Plan policies, in so far as the policies align with the framework for the consideration of harm to the significance of heritage assets set out in the NPPF:
- Rossendale: Rossendale LP Strategic Policies Strategic Policy SS (Spatial Strategy), ENV1 (High Quality Development in the Borough) and ENV2 (Historic Environment), as well as Policy ENV7 (Wind Turbines).
 - Rochdale: PFE Policies JP-P2 (Heritage) and JP-P1 (Sustainable Places), as well as and Rochdale CS Policies P2 (Protecting and enhancing character, landscape and heritage) and G3 (Renewable and Low Carbon Energy Developments), and saved Rochdale UDP Policy BE/17 (New Development Affecting Conservation Areas).

¹²⁸ Historic England Advice Note 15 (Second Edition) – Delivering Clean Power: Commercial Renewable Energy Development and the Historic Environment

13.42 The Proposed Development is also in full compliance with the following other material considerations:

- S.66 (1) and s.72 of The Planning (Listed Buildings and Conservation Areas) Act 1990
- NPPF Policies HE4, HE5, HE6, HE7 & HE9
- Historic Environment PPG Renewable & Low Carbon Energy PPG, Paragraph 019
- NPS EN-1 Section 5.9
- NPS EN-3 Paragraphs 2.12.78 – 2.12.90, 2.12.120 – 2.12.122 and 2.12.155 – 2.12.157
- Historic England Advice Note 15 (Second Edition) – Delivering Clean Power: Commercial Renewable Energy Development and the Historic Environment

Archaeology

Assessment

- 13.43 The potential effects of the Proposed Development to known and unknown archaeological assets through loss or disturbance have been considered as part of the EIA process with the results reported within *Volume 1, Chapter 13 of the Environmental Statement*. The EIA process / EIA has also considered the potential for the loss of / a reduction in paleoenvironmental remains.
- 13.44 The assessment has been focused upon a core study area which has been the subject of a detailed walkover survey with archaeological remains which may be affected directly or indirectly identified. A wider 1km study area was defined to identify all known heritage assets and known previous archeological interventions.
- 13.45 In addition, a range of published data sources were consulted including the Greater Manchester and Lancashire Historic Records (GMHER and LHER).
- 13.46 The assessment identified 283 heritage assets within the core study area and 1,414 heritage assets within the wider 1km study area.
- 13.47 The Proposed Development incorporates a number of primary mitigation measures which are embedded into the design which intend to avoid or minimise harm where possible. These include:
- applying the avoidance mitigation hierarchy in relation to peatland (as detailed in the *Outline Peat Management Plan*).
 - the use of floating road construction techniques where it is necessary to cross area of deep >1metre.
 - limiting the need for access tracks and underground electrical cabling to cross Rooley Moor Road to a single location and the use of protective measures over

the existing road surface¹²⁹ during construction with the road reinstated to its original form during the operational life of the wind farm.

- Avoiding, retaining and demarcating heritage assets during site works where possible (any asset within 50 metres of the working area would be fenced).

- 13.48 *Volume 1, Chapter 13 of the Environmental Statement* records that some known archaeological assets would be lost during the construction phase although the total number could be reduced through the application of micro-siting allowances. These are generally assessed as being of medium or low importance and it is considered that their loss would not be significant.
- 13.49 It is proposed that all affected assets would be subject to a programme of archaeological and / or historic building recording. Such work would allow for a programme of public benefit to be delivered through engagement with community groups and facilitating participation in field surveys, the results of which will be incorporated into onsite and offsite interpretation resources. The scope of surveys and public benefit would be agreed in advance with relevant stakeholders including Historic England, Lancashire County Council Historic Environment Team and Greater Manchester Archaeological Advisory Service.
- 13.50 There is also the potential for hitherto-unknown prehistoric artefacts and features and medieval and post-medieval remains to be present within the Site. The potential loss of these assets is assessed as being significant.
- 13.51 In accordance with national and local policy requirements a programme of intrusive archaeological investigations would be undertaken, initially commencing with evaluation trenching in the areas with highest potential and should further works be required these would be set out within a Written Scheme of Investigation which can be secured by planning condition. The level of effect would depend on the nature of the asset and the archaeological technique employed during investigations.
- 13.52 Any results of interest will be fed into onsite and offsite interpretation resources as described above for public benefit. Excavation and recording of the assets would ensure that impacts are offset by ensuring preservation by record.
- 13.53 *Volume 1, Chapter 13 of the Environmental Statement* also considers the potential for the construction of the Proposed Development to result in a loss / reduction in peat deposits preserving paleoenvironmental remains. The design of the Proposed Development incorporates embedded mitigation through the application of the peatland avoidance mitigation hierarchy and use of floating road construction techniques in areas of deeper peat. As the Proposed Development includes extensive areas of peat restoration and drain blocking, ground water levels would be expected to rise and as a result below ground remains are not expected to be affected by

¹²⁹

A layer of terram (or similar) will be laid over the existing road surface to prevent aggregate migration, followed by a geogrid with a layer of crushed stone to create the crossing surface. For the underground cable installation, a trench-based installation method is anticipated which would involve the temporary removal of the existing road surface, excavation of a cable trench, installation of the cable, and subsequent reinstatement of the road to its existing condition

dewatering. Overall, it is considered that the impact of the Proposed Development on peat deposits would, in terms of archaeology, be minor and not significant.

- 13.54 In recognition of this impact a programme of geo-archaeological investigation would be undertaken where peat depths are >2metres. The scope of work would be agreed with relevant stakeholders including Historic England, Lancashire County Council Historic Environment Team and Greater Manchester Archaeological Advisory Service. This would allow for the identification and sampling of deposits which have the potential to preserve paleoenvironmental remains providing opportunities for dating and enhancement of current knowledge which would offset the identified impacts and would be of public benefit.

Heritage Balance

- 13.55 NPPF Policy HE7(2) confirms that where a development proposal would harm the significance of a non-designated heritage asset, this should be weighed against the benefits of the proposal and a balanced judgement made, having regard to the scale of any harm or loss and the significance of the non-designated heritage asset.
- 13.56 *Volume 1, Chapter 13 of the Environmental Statement* concludes that there would be a negligible residual adverse effect (not significant) on Rooley Moor Road (non-designated heritage asset) during construction.
- 13.57 The Proposed Development would generate public benefits through engagement with community groups and facilitating participation in field surveys, the results of which will be incorporated into onsite and offsite interpretation resources – this accords with Paragraph 83 of Historic England’s Advice Note 15¹³⁰. Furthermore, there are a series of wider public benefits which are wide ranging. These are set out in detail in this PDAS and are not repeated here for the sake of brevity.
- 13.58 The benefits are, together, substantial and based on the findings of the archaeological impact assessment, are considered to materially outweigh the degree of harm which has been identified to the significance of Rooley Moor Road as a non-designated archaeological asset. This conclusion reflects the balancing exercise required in NPPF Policy HE7(2).

Policy Compliance

- 13.59 The Proposed Development is in full compliance with the following Development Plan policies, in so far as the policies align with the framework for the consideration of harm to the significance of heritage assets set out in the NPPF:
- Rossendale: Rossendale LP Strategic Policy ENV2 (Historic Environment).
 - Rochdale: PFE Policy JP-P2 (Heritage) and Rochdale CS Policies P2 (Protecting and enhancing character, landscape and heritage) and G3 (Renewable and Low Carbon Energy Developments).

¹³⁰ Historic England Advice Note 15 (Second Edition) – Delivering Clean Power: Commercial Renewable Energy Development and the Historic Environment

13.60 The Proposed Development is also in full compliance with the following other material considerations:

- NPPF Policies HE5(5), HE7(2) and HE10(2)
- NPS EN-1 Paragraphs 5.9.13 and 5.9.22
- NPS EN-3 Paragraphs 2.12.78 – 2.12.90
- Historic England Advice Note 15 (Second Edition) – Delivering Clean Power: Commercial Renewable Energy Development and the Historic Environment
- Historic England Peatlands and the Historic Environment: An Introduction to their Cultural and Heritage Value

Ecology

Assessment

Ecological Impact Assessment

- 13.61 An assessment of the potential effects of the Proposed Development in respect of ecology has been undertaken as part of the EIA process with the results reported within *Volume 1, Chapter 9 of the Environmental Statement*. This is supported by a detailed package of habitat and species surveys which are included in *Volume 2 of the Environmental Statement*.
- 13.62 The assessment confirms that the Proposed Development is unlikely to have ecological impacts on the following:
- Rochdale Canal SAC / SSSI, South Pennine Moors SAC / SSSI, Lower Red Lees Pasture SSSI, West Pennine Moors SSSI, Healey Dell Local Nature Reserve (LNR), five Sites of Biological Importance (SBI)¹³¹ and nine Biological Heritage Sites (BHS)¹³², due to the distance between the Site and these designated sites and the absence of hydrological connectivity between them, there will be no impact on the qualifying features.
 - Lee Quarry SSSI and Hodge Clough SSSI, as these are geological designations.
 - Bats (roosting), terrestrial invertebrates, aquatic invertebrates, fish and other mammals.
 - Invasive non-native species, as there was no evidence recorded within the Site.
- 13.63 A series of primary, tertiary and secondary mitigation measures have been identified for both the construction and operational stages of the Proposed Development to mitigate potential adverse effects. This includes the MRMP and Outline HMMP

¹³¹ Fordoe & Naden Woods & Quarry, Doctor Dam & Holt Wood, Old House & Mill Croft Brook, Naden Brook and Healey Dell

¹³² Fern Isle and Doctors Wood (Danes Wood), Dearden Clough (Plunge Valley), Sow Clough Fields, Lee Quarry, White Jones Fields, New Barn Clough Fields, Kenroy's Pond, Higher Boarsgreave Lodge and Hawks Clough

(summarised in Section 7 of this PDAS), as well as the inclusion of good practice ecological protection measures within the Construction Environmental Management Plan (CEMP), further pre-commencement species surveys / walkovers and erection of protective fencing, all of which can be secured via planning condition.

13.64 Following the implementation of these mitigation measures, the Proposed Development will result in the following residual effects during the construction stage:

- Minor adverse residual effect to:
 - One degraded blanket bog habitat¹³³ due to habitat loss/modification and hydrological change – this effect is not significant.
 - Acid grasslands due to habitat loss – this effect is not significant.
 - Waterbodies and watercourses (ponds, ditches and streams / brooks) due to habitat loss/modification and hydrological change – this effect is not significant.
- Negligible adverse residual effects on:
 - Knowl Moor SBI and Scout Moor BHS due to habitat loss/modification and hydrological change – these effects are not significant.
 - Bats (foraging and commuting) due to disturbance (via noise and light) and fragmentation of species ranges or habitats – this effect is not significant.
 - Species-poor soft rush due to habitat loss and hydrological change – this effect is not significant.
 - Badger, Water Vole, Otter, Reptile and Amphibians due to disturbance (via noise and light), fragmentation of species ranges or habitats and injury/mortality from construction activities – this effect is not significant¹³⁴.
- Minor to moderate beneficial residual effects to:
 - Three Degraded Blanket Bog Habitats¹³⁵ due to habitat loss/modification and hydrological change – these effects are a long-term significant benefit due to the proposed moorland restoration works set out in the MRMP.

13.65 Following the implementation of these mitigation measures, the Proposed Development will result in the following residual effects during the operational stage:

¹³³ M6 *Carex echinata* - *Sphagnum recurva/auriculatum* mire

¹³⁴ The effects are assessed in the range negligible – minor.

¹³⁵ Including M25 *Molinia caerulea* – *Potentilla erecta* mire, M20 *Criophore vaginatum* blanket and raised mire and M3 *Eriophorum angustifolium* bog pool

- Minor adverse residual effect on bats (foraging and commuting) due to disturbance (via noise and light), fragmentation of species ranges or habitats and injury/mortality from collision – this effect is not significant.
- Negligible adverse residual effect on other fauna (badgers, otter, water vole and herpetofauna) – this effect is not significant.

13.66 The residual effects to ecology are factored into the planning balance, conducted at Sections 14 and 15 of this PDAS. However, this residual harm is afforded very limited weight considering the degree of harm arising. The residual benefit is attributed moderate weight.

Biodiversity Net Gain

13.67 A *Biodiversity Net Gain Assessment* is submitted with the Application and the key conclusions are as follows:

- There is 458.04ha of blanket bog located within the Site, of which 16.9ha is proposed to be lost as a result of the Proposed Development. As blanket bog is classified as an irreplaceable habitat a bespoke compensation scheme is provided through the MRMP (summarised in Section 7 of this PDAS).
- The total baseline area-based habitats within the Site comprise 4,472.28 biodiversity units, with the predicted post-development value amounting to 4,953.985 biodiversity units, arising from the following interventions:
 - Enhancing 116.7ha of poor-condition blanket bog to moderate condition (only areas out with the proposed loss).
 - Enhancing 49.49ha poor-condition modified grassland to good-condition other upland acid grassland.
 - Creating 0.67ha of moderate-condition other mixed woodland.

This comprises an overall increase of 482.92 biodiversity units, which represents a net gain of 10.81%.

- The total baseline watercourse-based habitat units within the Site comprise 57.58 biodiversity units, with the predicted post-development value amounting to 63.69 biodiversity units, arising from the proposal to enhance 2.84km of moderate condition other rivers and streams to fairly good through the planting of shrubs, scrubs and trees along the bank tops and bank faces – the location of this planting will be confirmed via a Biodiversity Gain Plan pursuant to a planning condition. This comprises an overall increase of 6.11 biodiversity units, which represents a net gain of 10.62%.

Policy Compliance

13.68 On the basis of the above assessment, the Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to ecology and biodiversity:

- Rossendale: Rossendale LP Strategic Policies Strategic Policy SS (Spatial Strategy) and ENV1 (High Quality Development in the Borough) and Policies ENV4 (Biodiversity, Geodiversity and Ecological Networks), ENV5 (Green Infrastructure Networks), ENV6 (Environmental Protection), ENV7 (Wind Turbines) and ENV10 (Trees & Hedgerows).
- Rochdale: PFE Policies JP-G8 (A Net Enhancement of Biodiversity and Geodiversity), JP-P1 (Sustainable Places), JP-Strat13 (Strategic Green Infrastructure), JP-G2 (Green Infrastructure Network), JP-G5 (Uplands) and JP-G7 (Trees and Woodland), as well as Rochdale CS Policies SP3/R (The Strategy for Rochdale), G6 (Enhancing green infrastructure), G7 (Increasing the value of biodiversity and geodiversity), G8 (Managing Water Resources and Flood Risk), DM1 (General Development Management Requirements) and G3 (Renewable and Low Carbon Energy Developments), as well as saved Rochdale UDP Policy NE/2 (Designated Sites of Ecological and Geological / Geomorphological Importance).

13.69 The Proposed Development is in full compliance with NPPF Policy N2, in so far as it relates to biodiversity and supporting nature's recovery, as well as NPPF Policies N3 and DP3(2)(c) in respect of the provision of new trees and measures for long-term maintenance (identified via the OHMMP). In accordance with NPPF Policy N6(1)(a) and (b), the Proposed Development does not adversely affect a site of international or national importance. Whilst negligible adverse residual effects have been identified to Knowl Moor SBI and Scout Moor BHS due to habitat loss/modification and hydrological change, these affects are not significant, and the benefits of the Proposed Development (as summarised in this PDAS) are considered to outweigh the limited impact on the features which make the sites' valuable for nature conservation – therefore the impact of the Proposed Development on sites of local importance complies with NPPF Policy N6(1)(c). Furthermore, in accordance with NPPF Policy N6(2), whilst the Proposed Development entails some loss of irreplaceable habitat (blanket bog) it is considered that the public benefits (as summarised in this PDAS) clearly outweigh the limited loss, and a suitable compensation strategy (in the form of the MRMP) exists in order to demonstrate exceptional reasons to support the grant of consent.

13.70 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to ecology and biodiversity:

- Rossendale's Climate Change SPD (Chapter 6)
- Rochdale's Biodiversity and Development SPD
- Holcroft Moss Planning Obligations Joint SPD
- South Pennine Moors Special Area of Conservation (SAC) / Special Protection Areas (SPAs) Joint SPD
- Biodiversity Net Gain PPG

- Natural Environment PPG
- Renewable & Low Carbon Energy PPG, Paragraph 018
- NPS EN-1 Paragraph 5.4.2
- NPS EN-3 Paragraphs 2.12.51 – 2.12.57, 2.12.67 – 2.12.73, 2.12.113 – 2.12.117 and 2.12.147 – 2.12.151
- Lancashire Local Nature Recovery Strategy 2026
- Greater Manchester Local Nature Recovery Strategy 2025

Ornithology

Assessment

- 13.71 An assessment of the potential effects of the Proposed Development in respect of ornithology has been undertaken as part of the EIA process with the results reported within *Volume 1, Chapter 10 of the Environmental Statement*. This is supported by a detailed package of ornithological surveys which are included in *Volume 2 of the Environmental Statement*, the scope of which has followed good practice guidance specific to wind farm development.
- 13.72 The assessment confirms that the Proposed Development is unlikely to have ornithological impacts on the following:
- Noise, disturbance / displacement and loss of breeding habitat for breeding passerines;
 - Collision risk to migratory wildfowl; and
 - Disturbance, loss of foraging habitat and additional mortality for SPA and SSSI bird populations.
- 13.73 A series of primary, tertiary and secondary mitigation measures have been identified for both the construction and operational stages of the Proposed Development to mitigate potential adverse effects. This includes the Outline HMMP (summarised in Section 7 of this PDAS), as well as the inclusion of good practice ecological protection measures within the Construction Environmental Management Plan (CEMP) and further pre-commencement species surveys / walkovers, all of which can be secured via planning condition.
- 13.74 Following the implementation of these mitigation measures, the Proposed Development will result in the following residual effects during the construction stage:
- Minor adverse residual effect to:
 - Curlew and Merlin as a result of displacement due to the loss and degradation of habitats, and disturbance – this effect is not significant.
 - Negligible adverse residual effect to:

- Breeding Waders: Lapwing and Dunlin as a result of displacement due to the loss and degradation of habitats, and disturbance – this effect is not significant.
- Merlin, Lapwing, Dunlin and Curlew as a result of population decline of breeding upland birds within the West Pennine Moors SSSI – this effect is not significant.

13.75 Following the implementation of the above mentioned mitigation measures, the Proposed Development will result in the following residual effects during the operational stage:

- Minor adverse residual effect to:
 - Merlin and Kestrel as a result of increased mortality due to collision – this effect is not significant.
- Negligible adverse residual effect to:
 - Lapwing and Curlew as a result of increased mortality due to collision – this effect is not significant.
 - Breeding Waders: Lapwing and Dunlin as a result of displacement due to the loss and degradation of habitats, and disturbance – this effect is not significant.
 - Merlin, Lapwing, Dunlin and Curlew as a result of population decline of breeding upland birds within the West Pennine Moors SSSI – this effect is not significant.

13.76 The residual effects to ornithology are factored into the planning balance, conducted at Sections 14 and 15 of this PDAS. However, this residual harm is afforded very limited weight considering the degree of harm arising.

Policy Compliance

13.77 On the basis of the above assessment, the Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to ornithology:

- Rossendale: Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough) and Policies ENV4 (Biodiversity, Geodiversity and Ecological Networks), ENV5 (Green Infrastructure Networks), ENV6 (Environmental Protection), ENV7 (Wind Turbines) and ENV10 (Trees & Hedgerows).
- Rochdale: PFE Policy JP-G8 (A Net Enhancement of Biodiversity and Geodiversity), Rochdale CS Policies G6 (Enhancing green infrastructure), G7 (Increasing the value of biodiversity and geodiversity), G8 (Managing Water Resources and Flood Risk), DM1 (General Development Management Requirements) and G3 (Renewable and Low Carbon Energy Developments), as well as Rochdale UDP Policy NE/2 (Designated Sites of Ecological and Geological / Geomorphological Importance).

13.78 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to ecology and biodiversity:

- Rossendale's Climate Change SPD (Chapter 6)
- Rochdale's Biodiversity and Development SPD
- South Pennine Moors Special Area of Conservation (SAC) / Special Protection Areas (SPAs) Joint SPD
- NPPF Policies N2 and N6
- Biodiversity Net Gain PPG
- Natural Environment PPG
- Renewable & Low Carbon Energy PPG, Paragraph 018
- NPS EN-1 Section 5.4
- NPS EN-3 Paragraphs 2.12.51 – 2.12.57, 2.12.67 – 2.12.73, 2.12.113 – 2.12.117 and 2.12.147 – 2.12.151

Peatland

Assessment

- 13.79 An assessment of the potential effects of the Proposed Development in respect of peatland has been undertaken as part of the EIA process with the results reported within *Volume 1, Chapter 14 of the Environmental Statement*.
- 13.80 The spatial occurrence and depth distribution of peat across the Site has been examined extensively based on guidance from Natural England, the UK Peatland Strategy (2018–2040) and Peatland Survey: Guidance on Developments on Peatland (Scottish Government, Scottish Natural Heritage, SEPA, 2017). High-density probing has been undertaken at all infrastructure locations to determine peat depth and ensure appropriate and accurate avoidance wherever possible.
- 13.81 The following summarises the results of the various phases of the peat survey campaign and subsequent interpreted peat depth contouring across the Site:
- Peat is recorded across much of the Site. However, there are areas, some fairly large, where no peat is present. The largest areas absent of peat are in the southern section of the Site
 - Peat is deepest in the western part of the Site, where it occupies a hilltop area. While there is no strict pattern to its distribution, the deeper deposits tend to occur in pockets rather than forming a continuous expanse. Peat up to 1m in depth is relatively widespread across the area. Overall, peat is extensive across the Site but varies in depth and distribution;

- The maximum peat depth recorded was circa 3.7m in the west of the Site; and
 - As a result of modification and degradation of the peat habitats, the depth of the peat does not always relate to the quality of the overlying habitat.
- 13.82 In summary, the peat on-site is experiencing erosion in numerous locations and will continue to do so without intervention. There are numerous gullies of varying size which are draining and dewatering the peatlands, and transferring peat particles away from the Site and into watercourses. There are areas of bare peat at the base of the gullies, and at the margins peat is often exposed and is resulting in continued gradual degradation.
- 13.83 A series of primary, tertiary and secondary mitigation measures have been identified for both the construction and operational stages of the Proposed Development to mitigate potential adverse effects. This includes:
- Sensitive design approach adopted, including seeking to avoid siting infrastructure on peat (particularly deeper peat).
 - Where feasible, and considering other constraints, floating tracks are proposed where tracks are located on peat >0.5m depth and slopes are <5 degrees, to reduce peat excavation.
 - Development of an *Outline Peat Management Plan (Volume 2, Appendix 14.3 of the Environmental Statement)*, which sets out how the avoidance mitigation hierarchy has been applied in the design of the Proposed Development, as well as the measures for the management and reuse of peat extracted during the construction (summarised in Section 7 of this PDAS).
 - Detailed peatland restoration strategy as described within the *Moorland Restoration and Management Plan*.
 - Further ground investigation surveys to be undertaken prior to commencement of construction to inform detailed design and micro-siting – these will be secured via planning condition.
 - Application of a CEMP, including good practice measures to protect peatland.
 - Implementation of the *Drainage Strategy* to maintain and increase saturation of peat.
- 13.84 Following the implementation of these mitigation measures, the Proposed Development will result in the following residual effects during the construction stage:
- Minor adverse residual effects to peat resource (on-site peat) – these effects are not significant.
- 13.85 Following the implementation of these mitigation measures, the Proposed Development will result in the following residual effects during the operational stage:

- Minor beneficial residual effects to peat resource (on-site peat) – this effect is not significant.

13.86 It is material to the consideration of the Applications that this FEI Submission represents an overall betterment in comparison to the 2025 Submission, comprising:

- 51% less infrastructure located on peat over 1m depth (reduced from 31,746m² to 15,631m²).
- 33% reduction in the average depth of peat beneath permanent hardstanding (average depth reduced from 50cm to 30cm).
- 28% reduction in peat excavation (37,000m³ less excavation), including 30% reduction in catotelm peat excavation and 14% reduction in acrotelm peat reduction.

Policy Compliance

13.87 As acknowledged in Section 10 of this PDAS, limited conflict has been identified with Rossendale LP Policy ENV7 in so far as it seeks to preclude any development taking place on peat with a depth greater than 40cm. However, Policy ENV7 is internally inconsistent in that it initially refers to areas of deep peat (>40cm) and blanket bog being “avoided”, but later states that “no development [should be] proposed on areas of peat of over 40cm depth”. The policy conflict which arises in this regard should be afforded limited weight when having regard to the wider benefits of the Proposed Development both in terms of the delivery of peatland restoration, the residual beneficial effects which would be realised and the contribution to meeting the need for new onshore wind energy reflected in national policy (as detailed in Section 2 of this PDAS).

13.88 However, on the basis of the above assessment, the Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to peatland:

- Rochdale: PFE Policies JP-S2 (Carbon and Energy) and JP-G5 (Uplands), as well as Rochdale CS Policies G3 (Renewable and Low Carbon Energy Developments) and G7 (Increasing the Value of Biodiversity and Geodiversity).

13.89 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to peatland:

- Rossendale’s Climate Change SPD
- Rochdale’s Biodiversity and Development SPD
- NPPF Policies CC2(f), N2, N6 and L2(1)(a)

- UK Peatland Strategy and IUCN UK Peatland Programme guidance¹³⁶
- NatureScot Peatland Guidance¹³⁷
- Forestry Commission, Forest Research, and Natural England Guidance¹³⁸
- Environment Agency Guidance¹³⁹
- England Peat Action Plan¹⁴⁰
- Lancashire Local Nature Recovery Strategy 2026
- Greater Manchester Local Nature Recovery Strategy 2025

Hydrology & Hydrogeology

Assessment

- 13.90 An assessment of the potential effects of the Proposed Development in respect of hydrology and hydrogeology has been undertaken as part of the EIA process with the results reported within *Volume 1, Chapter 14 of the Environmental Statement*.
- 13.91 A detailed overview of the baseline conditions of the Site is set out including an assessment of public and private water supplies, as well as the hydrological and hydrogeological features present.
- 13.92 The assessment confirms that the Proposed Development is unlikely to have hydrological or hydrogeological impacts on the following:
- Effects on licenced and private water supplies located over 1km from the Site and over 250m from infrastructure associated with the Proposed Development; and
 - Effects on Groundwater Dependent Terrestrial Ecosystems¹⁴¹ ('GWDTEs') located over 250m from infrastructures excavations >1m depth and 100m from excavations <1m depth.

¹³⁶ IUCN UK Peatland Programme (2018). UK Peatland Strategy 2018–2040. Available at: <https://www.iucn-uk-peatlandprogramme.org/resources/uk-peatland-strategy-2018-2040>

IUCN UK Peatland Programme. Peatland Restoration. Available at: <https://www.iucn-uk-peatlandprogramme.org/peatland-restoration>

¹³⁷ NatureScot (2023). Advising on peatland, carbon-rich soils and priority peatland habitats in development management. Available at: <https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management>

¹³⁸ Forestry Commission, Forest Research, and Natural England (2021). *Decision Support Framework for Peatland Protection and the Establishment of Woodland*. Available at: <https://www.gov.uk/government/publications/decision-support-framework-for-peatland-protection-the-establishment-of-new-woodland-and-re-establishment-of-existing-woodland-on-peatland-in-england>

¹³⁹ Environment Agency (2004). *Guidance on the Management of Peat Soils and the Use of Peat in Construction*. Science Report SC030136.

¹⁴⁰ DEFRA (2021). *England Peat Action Plan*. Available at: <https://www.gov.uk/government/publications/england-peat-action-plan>

¹⁴¹ GWDTEs are habitats that are dependent on groundwater.

- 13.93 A series of primary, tertiary and secondary mitigation measures have been identified for both the construction and operational stages of the Proposed Development to mitigate potential adverse effects. This includes:
- All wind farm infrastructure has been sited with an objective to maintain a 30m 'buffer zone' from natural watercourses and water bodies shown on 1:50,000 scale and 1:25,000 scale Ordnance Survey mapping;
 - All infrastructure is located outside of flood zones, except for watercourse crossings;
 - Wind farm infrastructure was designed to minimise the number of new watercourse crossings, and existing access tracks have been utilised where possible;
 - During the detailed design and construction stage, sections of track will be surveyed and micro-sited to optimise the distance from water bodies.
 - Application of a CEMP, including good practice measures to protect hydrological and hydrogeological receptors.
- 13.94 Following the implementation of these mitigation measures, the Proposed Development will result in the following residual effects during the construction stage:
- Minor adverse residual effects to on / off-site waterbodies and watercourses; public water supplies (reservoirs); private water supply sources; and GWDTEs (polygon 281) – these effects are not significant.
- 13.95 Following the implementation of these mitigation measures, the Proposed Development will result in the following residual effects during the operational stage:
- Minor adverse residual effects to on / off-site waterbodies and watercourses; public water supplies (reservoirs); private water supply sources; and GWDTEs (polygon 281) – these effects are not significant.

Policy Compliance

- 13.96 On the basis of the above assessment, the Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to hydrology and hydrogeology:
- Rossendale: Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough) and Policies ENV6 (Environmental Protection) and ENV9 (Surface Water Run-off, Flood Risk, Sustainable Drainage and Water Quality).
 - Rochdale: PFE Policies JP-S4 (Flood Risk and the Water Environment), JP-G5 (Uplands) and JP-G2 (Green Infrastructure Network), as well as Rochdale CS Policies G6 (Enhancing Green Infrastructure), G8 (Managing Water Resources and Flood Risk), G9 (Reducing the Impact of Pollution, Contamination and Land Instability) and DM1 (General Development Management Requirements). It is also compliant with saved Rochdale UDP Policies EM/8 (Protection of Surface

and Ground Water) and NE/2 (Designated Sites of Ecological and Geological / Geomorphological Importance).

13.97 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to hydrology and hydrogeology:

- Rossendale's Climate Change SPD
- NPPF Policies P3 and F8
- Water Supply, wastewater and water quality PPG

Flood Risk & Drainage

Assessment

13.98 A *Flood Risk Assessment* (FRA) is submitted as part of the Application. It assesses the flood risk posed to the Proposed Development from a range of sources and recommends appropriate flood risk mitigation measures. In summary, the FRA concludes:

- The Site has a low fluvial flood risk as it is wholly within Flood Zone 1, which have less than 0.1% annual probability of river or sea flooding.
- The Site has low flood risk from other sources, including sewers, canals and reservoirs.
- The Site has a moderate surface water flood risk. The Proposed Development has been designed to avoid these areas wherever possible and micro-siting will be employed to further reduce the potential impacts.
- The proposed moorland restoration works (set out in the MRMP and summarised in Section 7 of this PDAS) will contribute to natural flood management within the wider catchment area. Degraded moorland, particularly areas of drained or eroded peat, typically exhibits reduced water retention capacity and more rapid surface runoff, which can exacerbate downstream flood risk during periods of heavy rainfall. In contrast, restored moorland and peatland habitats act as natural hydrological buffers. By re-wetting peatlands and restoring vegetation cover, the landscape regains its ability to hold and slowly release water over time. Specifically, the restoration proposals are expected to:
 - Increase the catchment's water storage capacity, reducing the volume and velocity of water entering watercourses during storm events.
 - Improve soil structure and vegetation cover, which enhances infiltration and reduces surface runoff.
 - Attenuate peak flows, helping to "flatten" the hydrograph and decrease the severity of flood events downstream.

- Stabilise eroded areas, reducing sediment transport and improving water quality in nearby rivers and streams.

13.99 A Drainage Strategy (DS) is also submitted as part of the Application and provides an outline surface water management strategy to mitigate any impact from surface water runoff from the Proposed Development. In summary, the DS confirms that the provision of a Sustainable Drainage System (SuDS) will treat and attenuate the surface water runoff prior to discharge. The design will accommodate surface run-off for the 1 in 30-year event. This includes:

- Trackside drainage – surface water drainage ditches adjacent to access tracks that will include permanent check dams (to reduce velocity, slow sediment transport and prevent channel scour) and relief drains crossing the tracks longitudinally to prevent surcharging. These trackside drains will be drained to the existing drainage sub-catchments across the site at a controlled rate to ensure no increase in flows; and
- Attenuation basins – Attenuation features will be located adjacent to and downslope of each turbine hardstanding area, substation and compound, with runoff shedding overland into the basin/swale features. These will be vegetated basins will allow any exceedance flows to overtop and shed back into the surrounding downslope, thus maintaining existing overland flow routes within each sub-catchment. These flows eventually route into the watercourses within and adjacent to the site.
- The features are designed to accommodate the 1 in 30 year event, with a conservative estimate of all flows from the temporary and permanent working areas contributing. The attenuation basin is designed to drain down in a controlled manner following rainfall events, ensuring that stored surface water is gradually released rather than discharged rapidly. Water collected within the basin will be conveyed via a piped outfall system, which directs flows safely to a nearby watercourse. To prevent downstream flooding and maintain greenfield runoff conditions, a flow control structure will be installed at the outlet, restricting discharge to the agreed greenfield runoff rate. This controlled release mimics natural drainage patterns, reducing peak flows and supporting sustainable water management within the site.
- Where new infrastructure or hardstanding is proposed on site, existing overland flow paths may be severed, preventing the surface water from its natural flow through the catchment. In order to maintain these flow paths, interception drains should be included on the upslope side of any hardstanding to capture the clean runoff and route it around to the downslope side. This can be by means of swale or drainage ditch, which is then piped to the downslope side and released in a controlled way, such as unlined filter drain or swale

13.100 In consideration of the above it can be concluded that the design of the Proposed Development is acceptable from a Flood Risk perspective (both in terms of its risk of being affected by and giving rise to).

Policy Compliance

13.101 On the basis of the above assessment, the Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to flood risk and drainage:

- Rossendale: Rossendale LP Policy ENV9 (Surface Water Run-off, Flood Risk, Sustainable Drainage and Water Quality) and Strategic Policy ENV1 (High Quality Development in the Borough).
- Rochdale: PFE Policies JP-S4 (Flood Risk and the Water Environment), JP-G5 (Uplands) and JP-G2 (Green Infrastructure Network), as well as Rochdale CS Policies G6 (Enhancing Green Infrastructure), G8 (Managing Water Resources and Flood Risk), P3 (improving design of new development) and DM1 (General Development Management Requirements) and saved Rochdale UDP Policies EM/7 (Development Flood Risk) and EM/8 (Protection of Surface and Ground Water).

13.102 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to flood risk and drainage:

- NPPF Policies F4-F8, CC3(1)(a), CC3(1)(c) and DP3(2)(c)
- Flood Risk & Coastal Change PPG
- NPS EN-1 Section 5.8
- NPS EN-3 Paragraphs 2.12.58 – 2.12.66
- Rossendale Hybrid Level 1 and Level 2 Strategic Flood Risk Assessment
- Rossendale Borough Environmental Network Study
- Bury, Rochdale and Oldham Strategic Flood Risk Assessment
- Rochdale Borough's Strategy for Flood Risk Management 2014-2024

Noise & Vibration

Assessment

13.103 An assessment of the potential effects of the Proposed Development in respect of noise has been undertaken as part of the EIA process with the results reported within *Volume 1, Chapter 7 of the Environmental Statement*.

13.104 The noise assessment has been informed by relevant policy and guidance including the NPPF, the PPG for Renewable and low carbon energy, the 'Assessment and Rating of Wind Turbine Noise' (ARWTN)¹⁴² and 'A Good Practice Guide to the Application of

¹⁴² DESNZ (June 2026) 'The Assessment and Rating of Noise from Wind Turbines'. Available: [Assessment and rating of noise from wind turbines: guidance - GOV.UK](#)

ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise'¹⁴³ which represents current good practice, as well as NPS EN-1 and EN-3. The assessment is informed by pre-application consultation with the Environmental Health Departments of RBC and RMBC, and has also been updated to reflect consultation responses received in relation to the 2025 Submission – including the advice of the Councils' third-party advisors Hayes McKenzie Partnership.

13.105 The PPG for Noise¹⁴⁴ states that the management of the noise associated with wind turbines is considered in the PPG 'Planning for renewable and low carbon energy and the 'Assessment and rating of noise from wind farms (ETSU-R-97)'.

13.106 The PPG 'Planning for renewable and low carbon energy'¹⁴⁵ states:

"The report, [ETSU-R-97: The assessment and rating of noise from wind farms](#) should be used by local planning authorities when assessing and rating noise from wind energy developments. Good practice guidance on noise assessments of wind farms has been prepared by the Institute of Acoustics. The Department for Energy Security and Net Zero accept that it represents current industry good practice and endorses it as a supplement to ETSU-R-97".

13.107 NPS EN-3 (Section 2.12) states:

'The method of assessing the impact of noise from a wind farm on nearby residents is described in the report, 'The Assessment and Rating of Noise from Wind Farms' (ETSU-R-97). This was produced by the Working Group on Noise from Wind Turbines Final Report, September 1996 and the report recommends noise limits that seek to protect the amenity of wind farm neighbours. Therefore, noise limits will often influence the separation of wind turbines from residential properties.

The applicant's assessment of noise from the operation of the wind turbines should use ETSU-R-97, taking account of the latest industry good practice [such as the IOA GPG]. This should include any guidance on best practice that the government may from time to time publish.'

13.108 Furthermore, when discussing how the Secretary of State should approach decision making for onshore wind developments NPS EN-3 states the following:

'The Secretary of State should consider noise and vibration impacts according to Section 5.11 of EN-1 and use ETSU-R-97, or any updated versions of this guidance that may be produced, to satisfy itself that the noise from the operation of the wind turbines is within acceptable levels.

¹⁴³ Institute of Acoustics (IOA) 'A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise' (IOA GPG, 2013)

¹⁴⁴ HM Government (2019). Guidance 'Noise'. Available at: [Noise - GOV.UK](#)

¹⁴⁵ HM Government (2023). Guidance 'Renewable and low carbon energy'. Available at: [Renewable and low carbon energy - GOV.UK](#).

Where the correct methodology has been followed and a wind farm is shown to comply with ETSU-R-97 recommended noise limits, the Secretary of State should give no weight to adverse noise impacts from the operation of the wind turbines.'

13.109 NPS EN-3 notes, with regards to the above, that:

'All references to ETSU-R-97 in this section should be taken to include any updated, successor or supplementary guidance endorsed or published by the Government'

13.110 Furthermore, ARWTN itself states in Section 1.12, that:

'Reference to ETSU-R-97 in UK planning policy or guidance should be interpreted to mean a reference to this technical guidance, which replaces ETSU-R-97.'

13.111 As the successor to ETSU-R-97, ARWTN is therefore endorsed by NPS EN-3 and also supersedes references in the PPG for Renewable and Low Carbon Energy and PPG for Noise.

13.112 ARWTN confirms that the noise assessment criteria confirmed in the guidance is *"consistent with the UK's statutory commitment to achieve net zero greenhouse gas emissions by 2050, supporting the deployment of renewable energy infrastructure while ensuring that potential adverse impacts on people are appropriately limited"*. Further detail on the scope and content of ARWTN is set out within *Volume 2, Appendix 7.2 of the Environmental Statement*.

13.113 The effects of noise during construction and operation of the Proposed Development were assessed. The effects from various sources including amplitude modulation and infrasound and low frequency noise during operation were 'scoped' out of the ES but assessment is provided within *Volume 2, Appendix 7.2 of the Environmental Statement*.

13.114 To inform the assessment of potential effects, baseline noise monitoring was undertaken during the period December 2024 and February 2025 at six locations.

13.115 The assessment of effects during construction considered impacts at 21no. representative noise assessment locations (NALs) and was undertaken in accordance with ISO 9613-2:2024 *'Acoustics – Attenuation of sound during propagation outdoors Part 2: Engineering method for the prediction of sound pressure levels outdoors'*. The assessment was based upon an assumed typical selection of plant for a project of this nature and assessed a number of construction scenarios where different activities may be being undertaken in different parts of the site at the same time chosen to represent the likely noisiest works. A number of 'worst case' assumptions were applied.

13.116 In respect to noise during operation, having regard to ARWTN and associated guidance documents, the results of the baseline noise monitoring, the number and proximity of dwellings located nearby and the noise limits imposed on other wind turbines operating in the area¹⁴⁶, the 'Total Noise Assessment Criteria' (TNAC) for the Proposed Development operating in conjunction with other schemes was established¹⁴⁷. Site

¹⁴⁶ Imposed by planning condition

¹⁴⁷ 40 dB(A) or background plus 5 dB whichever is the greater during the daytime period and at 43 dB(A) or background plus 5 dB whichever is the greater during the night-time period. The exception to this is

Specific Noise Limits (SSNLs) have also been derived in accordance with ARWTN, with the daytime SSNL restricted from exceeding the limit that would be applicable to the Proposed Development in isolation (i.e. 35 dBA or background plus 5 dB, whichever is greater).

13.117 The operational noise assessment was based on a candidate wind turbine (Nordex 149 5.7MW with serrated trailing edge blade and a hub height of 105m). The Nordex turbine model was chosen as it is considered to be representative of the type of turbine that could be installed. There are a number of wind turbine makes and models that may be suitable for the Proposed Development. Should the Proposed Development receive consent, the final choice of turbine would be subject to a competitive tendering process. The final choice of turbine would, however, have to meet the noise limits determined and contained within any condition imposed.

13.118 As explained in Section 6 of this PDAS, the design of the Proposed Development has followed an iterative process whereby the potential effects from noise on residential amenity have been a primary consideration in the siting of individual turbines.

13.119 The noise assessment demonstrates that:

- The construction noise levels would be below the relevant limits at all receptors during weekdays and Saturday daytime. Noise levels would also be below relevant limits for evenings, weekends and night times except at a single receptor which would be affected by the construction of the temporary laydown area on Scout Road and the use of a diesel generator to providing lighting. These results were generated using a range of conservative assumptions (such that actual noise levels would likely be lower). Nonetheless the potential for the impact can be mitigated through the use of planning conditions which limit the construction of the laydown area to 07.00 – 19.00 (weekday) and 07.00 -13.00 (Saturday daytime) and preclude the use of diesel generators between 23.00 – 0700. Should lighting be required within the laydown area during night-time hours, additional mitigation would be implemented such as a U-shaped acoustic barrier around the generator, details of which can be secured by planning condition.
- A cumulative assessment was undertaken at all 21 NALs. The results show that the predicted cumulative wind farm noise immission levels would meet the TNAC at all NALs during both the daytime and night-time periods.
- The wind turbine noise immission levels from the Proposed Development were predicted to be below the SSNLs at all NALs, with the exception of NAL2 and NAL4 under specific wind conditions during the daytime only, when considering the Nordex N149 5.7 MW with serrated trailing edge blades as a candidate turbine. The SSNL may be met through the use of wind turbine mode management, comprising the use of Low Noise Modes during specific wind conditions and times. The regime of mode management would be presented within an 'Operational Noise Management Plan' which will be prepared and

financially involved properties where a 45 db(A) limit has been applied – this relates to NAL21. The TNAC relates to noise from all wind farm / turbine developments in the area.

submitted for approval following final turbine selection. This can be secured by planning condition.

- The use of SSNLs would ensure that the Proposed Development could operate concurrently with other proposed, consented or operational turbines in the area and would also ensure that the Proposed Development's individual contribution could be measured and enforced if required.
- Should permission be granted for the Proposed Development it would be appropriate to include a set of noise related planning conditions, which detail the noise limits applicable to the Proposed Development.

13.120 It is material to the consideration of the Applications that this FEI Submission represents an overall betterment in comparison to the 2025 Submission. The reduction in the number of proposed wind turbines and the redesign of the layout has resulted in lower predicted operational noise levels at the nearest noise-sensitive receptors. This has reduced the number of receptors where noise limit exceedances are predicted under worst case conditions from four to two. At the remaining locations where noise limit exceedances are predicted, this is only expected to occur for a narrow range of wind speeds and directions, and not during prevailing conditions. As a result, the requirement for mitigation (via turbine mode management) has been reduced substantially compared to the 2025 Submission, which is a material benefit.

13.121 The mitigation, which will ensure compliance with relevant noise limits, can be secured by planning condition. *Volume 2, Appendix 7.2 of the Environmental Statement* presents proposed wording for these conditions.

Policy Compliance

13.122 Demonstrable compliance with the ARWTN noise limits enables the conclusion to be drawn that the effects of noise from the Proposed Development would, subject to the aforementioned mitigation, be minimised in so far as is reasonably practicable (mindful also of the national policy objectives to urgently increase the generation of electricity from onshore wind turbines) such that the Proposed Development complies with the requirements of Rossendale LP Policies ENV6 and ENV7 (which require that where effects cannot be avoided they be mitigated to an "acceptable level") and Rochdale CS Policies DM1 and GM3 (which require that mitigation for noise impacts be incorporated where necessary and that harm to residential amenity be minimised), as well as NPPF Policy P3(2)(d) (which requires that new development "*mitigate and reduce to a minimum potential adverse impacts resulting from noise, not result in levels of noise exposure which would have a significant observed adverse effect, and maintain the character of tranquil areas*").

13.123 The Proposed Development would also be in full compliance with Policy G9 (Reducing the Impact of Pollution, Contamination and Land Instability) of the Rochdale CS. On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to noise and vibration:

- NPPF Chapter 15 (Conserving and enhancing the natural environment)

- NPPF Policy P3
- Noise PPG
- Renewable & Low Carbon Energy PPG, Paragraph 015
- NPS EN-1 Section 5.12
- NPS EN-3 Paragraphs 2.12.99 – 2.12.103, 2.12.126 and 2.12.161 – 2.12.164

Shadow Flicker & Shadow Cast

Assessment

Residential Amenity: Shadow Flicker

- 13.124 The potential effects of the Proposed Development on residential amenity due to shadow flicker have been assessed as part of the EIA and are reported within *Volume 1, Chapter 8 of the Environmental Statement*.
- 13.125 Shadow flicker can occur when under certain combinations of geographical position and time of day, the sun can pass behind the rotors of a wind turbine and cast a shadow over neighbouring properties. When the blades rotate the shadow flicks on and off.
- 13.126 There are no published guidelines or standards for the assessment of shadow flicker in the UK.
- 13.127 In accordance with NPS EN3, the assessment has considered potential impacts to a representative sample (28 no.) of properties within 10 rotor diameters of individual wind turbines (1,500 metres)¹⁴⁸ and on a worse case basis whereby turbines are always ‘face on’ and the mitigation offered by factors such as cloudy skies and intervening vegetation is not accounted for.
- 13.128 The assessment shows that there is the potential for shadow flicker to occur at 27 of the 28 assessed properties at levels which would be considered significant at some properties.
- 13.129 To address this, a shadow flicker turbine control system will be installed in all wind turbines. The system will halt turbines when it detects that it is geometrically possible for shadow flicker to occur and the environmental conditions necessary for shadow flicker to occur are present. This is an established, tried / tested system successfully operated in wind farms around the world. The system would be designed based on more detailed surveys post consent and with reference to the specific turbine to be erected and would reduce potential effects to a level which is negligible. Further details and the submission of a shadow flicker management strategy can be secured by condition.

¹⁴⁸ Mindful of the application validation checklist (Rossendale BC) the assessment also considers potential effects to properties within ten times the maximum height of the turbines (1,800metres).

13.130 It is material to the consideration of the Applications that this FEI Submission represents an overall betterment in comparison to the 2025 Submission. The reduction in the number of proposed wind turbines and the redesign of the layout has resulted in lower predicted levels of shadow flicker at the nearest sensitive receptors. The number of receptors where shadow flicker effects could occur has also reduced from 31 to 27. The number of receptors where predicted worst-case theoretical shadow flicker levels exceeded 30 hours per year has reduced from 14 to 3, and those exceeding 30 minutes per day has reduced from 14 to 7. As a result, the requirement for mitigation of shadow flicker effects (targeted turbine shutdowns) has been reduced compared to the 2025 Submission.

Access and Recreation: Shadow Cast

13.131 The potential for the wind turbines to cast shadows across the Pennine Bridleway has been raised during public consultation and has been considered by the Applicant in the design of the Proposed Development.

13.132 There is no requirement in law or policy for an assessment of shadow cast on public rights of way or equestrian users to be undertaken but Cubico recognise that it is a relevant material consideration.

13.133 In the absence of guidance on how such an assessment should be undertaken, the Applicant and TNEI have considered the issue on a qualitative basis.

13.134 The British Horse Society (BHS) 'Advice on Wind Turbines and Horses for Riders and Drivers of Horses' guidance document advises that:

"From birth, horses become accustomed to moving shadows cast by clouds, passing birds, themselves, people or other animals. Movement of shadows over the ground will be slower than many other moving shadows they will encounter. Although the rhythmic shadow movement from a turbine is not natural, this may be as likely to cause a horse to ignore it as to react to it.

There are horses that are troubled by movement at ground level, such as wind through long grass, and they may respond similarly to a shadow of a turbine blade, but such sensitivities are probably already known to the rider or driver and considered, perhaps taking advantage of familiarisation days in a safer environment".

13.135 The BHS guidance recommends a minimum separation distance of blade tip height plus 10% between commercial turbines and any equestrian route, and this is maintained within the proposed layout and tip height of the Proposed Development.

13.136 The existing Scout Moor Wind Farm has been operational since 2008 and is within 475m of the Pennine Bridleway and 100m of the Rossendale Way. It is therefore reasonable to assume that the presence of wind turbines in the landscape and the 'casting' of shadows will already be well known to many riders and their horses.

13.137 Therefore, whilst there is the potential for shadow cast to occur, only certain horses would be affected during certain times of the day and during certain weather conditions.

13.138 Over time these horses could become accustomed to the occurrence. To assist this Cubico will host a number of wind farm familiarisation days for local riders and for those from further afield. Delivery and Management Plans for such events can be secured by planning condition.

13.139 The Rossendale Borough Council Validation Checklist states that:

“...the effects of Shadow Flicker on the users of bridleways within a 10 times turbine height radius should also be addressed”.

13.140 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.

13.141 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.

13.142 In the circumstances it may be concluded that the potential effect from shadow cast to horse and riders would not be significant and should only be afforded very limited weight in the decision-making process.

13.143 It is material to the consideration of the Applications that this FEI Submission represents an overall betterment in comparison to the 2025 Submission. The reduction in the number of proposed wind turbines and the redesign of the layout has resulted in a commensurate reduction in the potential for the occurrence of shadow cast.

Policy Compliance

13.144 On the basis of the above assessment, the Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to shadow flicker and shadow cast:

- Rossendale: Rossendale LP Policy ENV7 (Wind Turbines).
- Rochdale: Rochdale CS Policies G9 (Reducing the Impact of Pollution, Contamination and Land Instability) and G3 (Renewable and Low Carbon Energy Developments).

13.145 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to shadow flicker:

- NPPF Policy P3
- Renewable & Low Carbon Energy PPG, Paragraph 020

- NPS EN-3 Paragraphs 2.12.104 – 2.12.105, 2.12.127 – 2.12.128 and 2.12.165 – 2.12.168

Access & Transport

Assessment

- 13.146 A *Transport Assessment* (TA) is submitted as part of the Application and describes the potential access and transport impacts associated with the Proposed Development.
- 13.147 The Proposed Development will be accessed from an existing priority junction from the A680, that currently provides access to Scout Moor Wind Farm and Scout Moor Quarry (via Scout Road). The access junction will provide construction phase access to the Site for all abnormal loads associated with the delivery of turbines, as well as access for Heavy Goods Vehicles (HGV's) delivering construction materials and general construction traffic. It will also provide access for future maintenance vehicles during the operational phase.
- 13.148 The construction phase would result in a temporary increase in traffic flows on the road network surrounding the Site. The peak of construction in terms of vehicular movements will be 208 daily movements (100 Car/Light Vehicles and 108 HGV journeys).
- 13.149 The TA confirms that the peak level of vehicular activity can be accommodated within the existing road network. The additional vehicular activity would be temporary for the duration of construction activity. Once operational the additional vehicular activity associated with the wind farm would be negligible and limited to periodic visits from maintenance vehicles.
- 13.150 Construction of the wind farm would require the use of Abnormal Indivisible Loads (AIL) to transport the turbine blades to the Site, undertaken in convoys with escort vehicles. It is estimated that a total of 57 AIL convoys would be required, with a total of approximately 344 escort journeys (172 trips in and 172 trips out). As a result of the reduction in turbines presented in this FEI submission, there will be an approximately 30% reduction in the quantum of AIL deliveries required, which is a betterment that is material to the consideration of the Applications.
- 13.151 An AIL Transport Management Plan (AILTMP) will be prepared and submitted for approval once turbine procurement is completed and the point of delivery of turbine components to the UK is confirmed. This can be secured by planning condition.
- 13.152 A route survey has been completed and is submitted as part of the TA. It is presently anticipated that the turbine components would be delivered to the Port of Liverpool before being transported to Site via the A5036, A59, M58, M6, M65, A56, B5627 and A680.
- 13.153 The blades would be transported via a vehicle convoy system with police escort as required. Transportation would require the temporary removal of street furniture in some locations and temporary suspension of on street parking. The time and date of deliveries would be agreed with the Local Highway Authority(s), National Highways, police and community representatives with the aim of minimising the effect to the

road network and to local communities; the operation of local businesses in particular. Advance signage would be installed on the affected sections of highway network and details of delivery dates and parking restrictions etc. would be notified in advance using a range of media outlets.

13.154 In addition to the AILTMP a more general Construction Traffic Management Plan, a Path Management Plan, Access Track Management Plan and Staff Travel Plan will be prepared and submitted for approval. These can be secured by planning condition.

13.155 The Path Management Plan / Access Track Management Plan would provide details of how the interface between public users of the access tracks and rights of way and construction vehicles would be managed to minimise disruption and ensure user safety, building upon the framework set out within the *Outdoor Access Enhancement & Management Plan* submitted with the Application.

Policy Compliance

13.156 Overall, the TA concludes that the Proposed Development would not result in a severe residual cumulative impact on the road network, following implementation of the mitigation identified.

13.157 On the basis of the above assessment, the Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to access and transport:

- Rossendale: Rossendale LP Strategic Policies TR1 (Strategic Transport) and ENV1 (High Quality Development in the Borough), as well as Policies LT3 (Tourism) and ENV7 (Wind Turbines).
- Rochdale: PFE Policies JP-Strat6 (Northern Areas), JP-Strat14 (A Sustainable and Integrated Transport Network), JP-C1 (An Integrated Network), JP-C3 (Public Transport), JP-C4 (The Strategic Road Network), JP-C5 (Streets for All), JP-C6 (Walking and Cycling), JP-C7 (Freight and Logistics) and JP-C8 (Transport Requirements of New Development), as well as Rochdale CS Policies T1 (Delivering Sustainable Transport), T2 (Improving Accessibility), SP1 (Rochdale Borough's Role in the City Region), DM1 (General Development Management Requirements) and G3 (Renewable and Low Carbon Energy Developments). It is also compliant with saved Rochdale UDP Policy A/24 (Strategic Highway Network).

13.158 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to access and transport:

- NPPF Policy TR3, TR4 and TR6
- Travel Plans, Transport Assessments and Statements PPG
- Renewable & Low Carbon Energy PPG, Paragraph 016
- NPS EN-1 Section 5.14

- NPS EN-3 Paragraphs 2.12.18 – 2.12.22, 2.12.106 – 2.12.112, 2.12.129 – 2.12.135 and 2.12.168 – 2.12.171
- Rossendale Climate Change SPD (Chapter 3)

Public Access & Recreation

Assessment

- 13.159 As set out in Section 7 of this PDAS, an *Outdoor Access Management & Enhancement Plan* (OAMEP) is submitted with the Application which sets out a broad range of enhancements for public access to and appreciation of the moorland. For the sake of brevity, these measures are not replicated here but are summarised within Section 7 of this PDAS.
- 13.160 To ensure the benefits of these enhancements continue throughout the operational lifetime of the Proposed Development, the OAMEP sets out a monitoring and review strategy, comprising regular inspections of public access routes, community feedback mechanisms and action plans to respond to any requirements for repairs or further enhancements – this can be secured through an Operational Phase Outdoor Access Management Strategy related planning condition.
- 13.161 It is acknowledged that the presence of new wind turbines will affect the experience of using the moorland, including the various PRoW, bridleways and other routes which cross the Site and its surroundings, for some individuals / groups. The effects upon equestrian users specifically are considered in respect of shadow cast earlier in Section 13 of this PDAS. The effect on users of various PRoW, bridleway and other recreational assets in respect of changes in views / visual amenity is considered within the LVIA (*Volume 1, Chapter 11 of the Environmental Statement*) – in summary the impact on views from some paths will be significant and that some users will perceive this change as being adverse.
- 13.162 Furthermore, it is acknowledged that the construction of the Proposed Development would result in the need for closures or diversions of public rights of way, however, these will be temporary and minimised where possible. The OAMEP proposes management measures to be implemented during the construction of the Proposed Development, seeking to preserve access whilst ensuring the health and safety of all users of the moor – this will inform the preparation of a Path Management Plan which will be prepared by the appointed contractor and can be secured via planning condition.
- 13.163 Overall, the proposals set out within the OAMEP will provide a significant improvement in opportunities for outdoor access and recreational enjoyment of the moorland for walkers, cyclists and equestrian users.
- 13.164 However, whilst these benefits are important and will contribute to a range of active travel and health and wellbeing objectives, the weight which they should attract in the planning balance, presented in Sections 14 and 15 of this PDAS, is limited to moderate.

Policy Compliance

13.165 On the basis of the above assessment, the Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to public access and recreation:

- Rossendale: Rossendale LP Strategic Policies ENV1 (High Quality Development in the Borough), as well as Policies TR2 (Footpaths, Cycleways and Bridleway), ENV7 (Wind Turbines), LT3 (Tourism) and SD4 (Green Belt Compensatory Measures)
- Rochdale: PFE Policies JP-Strat6 (Northern Areas), Strat14 (A Sustainable and Integrated Transport Network), JP-C1 (An Integrated Network), JP-C6 (Walking and Cycling), JP-C8 (Transport Requirements of New Development), JP-G2 (Green Infrastructure Network), JP-P1 (Sustainable Places) and JP-P7 (Sport & Recreation), as well as Rochdale CS Policies T1 (Delivering Sustainable Transport), T2 (Improving Accessibility), G6 (Enhancing green infrastructure), G7 (Increasing the value of biodiversity and geodiversity), SP1 (Rochdale Borough's Role in the City Region), SP3/R (The Strategy for Rochdale, E5 (Encouraging the visitor economy), E6 (Supporting and diversifying the rural economy), P1 (Improving Image) and DM1 (General Development Management Requirements). It is also compliant with saved Rochdale UDP Policy RE/6 (Recreational Rights of Way).

13.166 Saved UDP Policy RE/7(g) (Recreational Management Areas) seeks to develop the recreational potential of Greenbooth and Naden Reservoirs. The policy confirms that within the defined Recreational Management Areas, RMBC will promote outdoor recreational uses that are consistent with the conservation and enhancement of the local landscape and ecology, including the provision of visitor facilities such as car parks and management services. The Proposed Development specifically proposes enhancements to Greenbooth Reservoir car park– on this basis, the proposal is considered to wholly comply with saved UDP Policy RE/7(g).

13.167 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to public access and recreation:

- NPPF Policies TR8, DP3(2)(c), DP3(2)(d), HC7 and GB5
- Rossendale's Climate Change SPD
- Open space, sports and recreation facilities, public rights of way and local green space PPG
- NPS EN-1 Section 5.14
- NPS EN-3 Section 2.12

Aviation & Meteorological Radar Impact

Assessment

- 13.168 An *Aviation and Met Radar Impact Assessment* has been completed by EGIS and has been submitted as part of the Application. The assessment considers the potential impact of the Proposed Development on a variety of types of infrastructure using a combination of publicly available information and bespoke modelling. Consultation has also been undertaken with a range of stakeholders including UK National Air Traffic Services (NATS), Manchester Airport Group (MAG), Ministry of Defence (MoD) and the UK Met Office.
- 13.169 The impact assessment focusses on whether the proposed wind turbines would be in radar line of sight and have a consequent detrimental impact on air traffic control services or impact flight operations. It also considers the impact on UK Met Office weather radars.

Radar Infrastructure

- 13.170 The technical assessment has identified some level of impact on aviation Primary Surveillance Radar (PSR) and UK Met Office weather radar that is highly likely to require mitigation to maintain performance to a level that will not impact operations. The assessment indicates that the Manchester Airport PSR and the UK Met Office Hameldon Hill weather radar represent the radars with the most significant potential impacts on services provided using those radars and likely to require mitigation. This has been confirmed through the stakeholder consultations that have been conducted. In addition, more limited but nonetheless identifiable interactions have been identified in relation to the NATS St Anne's PSR and BAE Warton PSR, which have been considered within the assessment. The impact of wind farms on aviation PSR is well understood and there are several options for mitigation that have already been implemented at other sites in the UK. The typical mitigation options include the use of a data feed from an unaffected radar, the upgrade of an existing radar to improve its wind farm mitigation capabilities, or the installation of an 'in-fill' radar with wind farm mitigation capabilities. Once a technical mitigation has been agreed and implemented no impact on aviation operations is anticipated.
- 13.171 The predicted impact on the UK Met Office Hameldon Hill weather radar is highly likely to affect the quality of Met Office forecasting and mitigation will be required. In some cases, the UK Met Office is able to implement its own mitigation by removing affected data where a wind farm only impacts the lowest beam elevation. However, it has been shown that Scout Moor II will also impact higher beam elevations. Alternative mitigation options are being explored which align with the general options proposed by the UK Met Office for mitigating the impact of wind farms on weather radars. It is therefore highly likely that technical solutions exist but further consultation is required with the Met Office to investigate the feasibility of the different options.
- 13.172 The appropriate mitigation solution would be identified in consultation with relevant aviation stakeholders and its design and implementation can be secured by planning condition.

13.173 Once a technical mitigation has been agreed and implemented no impact on aviation operations or MET office radar is anticipated.

Aviation Lighting

13.174 As the proposed wind turbines would be over 150 metres in height to blade tip aircraft obstacle lighting will be installed as a collision avoidance measure in the interests of aviation safety. This is a statutory requirement under the Air Navigation Order. The aviation lighting scheme has been designed to balance the requirements of civil, military and general aviation interests while also minimising light pollution to the local area.

13.175 The scheme includes a combination of visible ‘nacelle lights’ and infrared lights to make them visible to aircraft. Infrared lights will be installed to all turbines meaning that the need for nacelle lights can be minimised as far as possible whilst meeting UK Civil Aviation Authority (CAA) requirements – nacelle lights are only proposed on 8no. turbines¹⁴⁹. The nacelle lights will be controlled by an automated device, only turning on after sunset or when light levels fall below a prescribed threshold.

13.176 The proposed aviation lighting scheme has been agreed with the CAA prior to submission of the Application and is proposed to be secured via planning condition.

13.177 Furthermore, the Applicant commits to continued review of the aviation lighting scheme, in consultation with the CAA and MoD to ensure that any mitigation remains appropriate and where possible seeks to further reduce the night-time landscape effects (as summarised above) arising from light spill. On this basis, the Applicant proposes a planning condition be applied which requires such a review to be undertaken.

Policy Compliance

13.178 On the basis of the above assessment, the Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to aviation (including aviation lighting) and radar impact:

- Rossendale: Rossendale LP Policies ENV6 (Environmental Protection) and ENV7 (Wind Turbines)
- Rochdale: PFE Policy JP-S2 (Carbon and Energy)

13.179 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to aviation and radar impact:

- NPPF Policy P4-P6
- Renewable & Low Carbon Energy PPG, Paragraph 016
- NPS EN-1 Section 5.5

¹⁴⁹ T1, T4, T7, T10, T11, T14, T15 and T16

Telecommunications Impact

Assessment

- 13.180 A *Telecommunications Impact Assessment* (TIA) is submitted as part of the Application and assesses the potential impact of the Proposed Development on the wireless communications infrastructure (point-to-point links) in the surrounding area.
- 13.181 Consultation with Joint Radio Company (JRC), Airwave, Virgin Media O2, MLL Telecom, Mobile Broadband Network Limited (MBNL), Atkins, Arqiva, BT, and Vodafone has been undertaken. The outcomes are as follows:
- Airwave, MLL Telecom, MBNL, Vodafone and Virgin Media O2 have all confirmed no concerns with the Proposed Development.
 - Arqiva have provided details pertaining to their link infrastructure within the vicinity of the proposed development, which has an exclusion zone covering the northernmost section of the Proposed Development. Turbines T9, T11 and T16 infringe on the 100m exclusion zone requested by Arqiva. Arqiva have confirmed that it is a radio link and due to the distance of the turbines from the link ends, significant interference is not predicted. Arqiva have no objection to the Proposed Development.
 - BT have provided details pertaining to their link infrastructure within the vicinity of the Proposed Development. None of the proposed turbines infringes the exclusion zones of these links.
 - The JRC have provided an initial exclusion zone that covers a southern section of the site. The proposed turbines lie outside of this exclusion zone and therefore will not impact the identified JRC link.

13.182 The TIA also confirms no mitigation is expected to be required.

Policy Compliance

- 13.183 On the basis of the above assessment, the Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to telecommunications impact:
- Rossendale: Rossendale LP Policy ENV7 (Wind Turbines)
 - Rochdale: PFE Policies JP-C2 (Digital Connectivity), JP-C1 (An Integrated Network) & JP-S2 (Carbon and Energy), plus Rochdale CS Policies G3 (Renewable and Low Carbon Energy Developments) and E2 (Increasing jobs and prosperity).
- 13.184 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to telecommunications impact:
- NPPF Policy P6
 - Renewable & Low Carbon Energy PPG, Paragraph 017

Air Quality

Assessment

13.185 An *Air Quality Assessment* (AQA) is submitted as part of the Application and describes the potential air quality impacts associated with the Proposed Development. In summary the AQA confirms that:

- The Proposed Development will generate additional traffic on local roads during the construction and operation phases, which may impact on air quality at existing residential properties along the affected road network. The main air pollutants of concern related to road traffic emissions are nitrogen dioxide (NO₂) and fine particulate matter (PM₁₀ and PM_{2.5}).
- There is also the potential for the construction activities to impact upon sensitive receptors. The main pollutants of concern related to construction activities are dust and PM₁₀.
- There are no sensitive receptors within the relevant screening distances of the Site. Therefore, a full construction dust assessment has been screened out and the impacts associated with construction dust can be concluded to be not significant. Nonetheless, appropriate best practice measures have been recommended for inclusion in the Construction Environment Management Plan (CEMP) (to be secured via planning condition) to minimise the risk of nuisance from construction dust.
- The traffic generation levels associated with the construction and operation of the Proposed Development will be well below the relevant screening criteria. The AQA concludes that the Proposed Development will have a negligible impact on air quality conditions at all existing receptors.
- The overall construction and operational air quality effects of the Proposed Development are therefore judged to be 'not significant'.

Policy Compliance

13.186 On the basis of the above assessment, the Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to air quality:

- Rossendale: Rossendale LP Policy ENV6 (Environmental Protection)
- Rochdale: PFE Policies JP-S5 (Clean Air) and JP-C5 (Streets for All), as well as Rochdale CS Policies G9 (Reducing the Impact of Pollution, Contamination and Land Instability), DM1 (General Development Management Requirements), and G3 (Renewable and Low Carbon Energy Developments)

13.187 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to air quality:

- NPPF Policy P3

- Air Quality PPG
- NPS EN-1 Section 5.2 and 5.7
- Holcroft Moss Planning Obligations Joint SPD

Ground Conditions & Mining Risk

Assessment

13.188 A *Preliminary Risk Assessment* (PRA) is submitted as part of the Application and identifies potential land contamination risks and geoenvironmental constraints which could impact upon or restrict the Proposed Development. In summary, the PRA confirms that:

- Based on the mining and quarry history of the Site, it is likely that the Proposed Development will encounter areas of Made Ground. However, risks to future operators of the wind farm are likely to be very low to negligible as any work activities are unlikely to involve close contact with the ground. The nature of the Proposed Development will not significantly alter the ground conditions.
- Potential ground contamination risks to construction and site maintenance workers can be mitigated by the adoption of suitable working methods and the use of PPE.
- There are former underground coal mines. The mine shafts and underground workings have been identified as a potential source of mine gas that could be disturbed and or released during construction.
- The PRA recommends further ground investigation with respect to made ground, and the existing mine entries and shallow underground mine workings be undertaken prior to the commencement of development to inform any remedial works required – this can be secured via planning condition. The ground investigation will also inform any micro-siting of infrastructure.

13.189 A *Mining Risk Assessment* is submitted with the Application, as summarised below:

- The Site is subject to a substantial legacy of historical coal mining activities, as well as a more limited history of sandstone flag mining.
- The layout of the Proposed Development has sought to avoid the known areas of previous mine workings, however, there remains some potential for recorded and unrecorded workings to be within the influencing distance of some of the infrastructure components; the extents of which cannot be accurately established without intrusive ground investigation to prove either the presence of workings or that suitable depth of cover of intact rock is present.
- On this basis, the *Mining Risk Assessment* sets out a schedule of ground investigation works which would be required to be undertaken prior to the commencement of development, and which can be secured via planning

condition. The ground investigation will also inform any micro-siting of infrastructure which may be required.

- Where the ground investigation identifies a mining constraint which cannot be avoided by micro-siting, then alternative mitigation will be required. This is likely to comprise grouting in accordance with the CIRIA Abandoned Mine Workings Manual (C758D). Therefore, it is proposed that a Mine Works Remediation Strategy is submitted and approved via planning condition, in consultation with the Mining Remediation Authority.

Policy Compliance

13.190 On the basis of the above assessment, the Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to ground conditions:

- Rossendale: Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough) and Policy ENV6 (Environmental Protection)
- Rochdale: Rochdale CS Policies G9 (Reducing the Impact of Pollution, Contamination and Land Instability), G7 (Increasing the value of biodiversity and geodiversity) and DM1 (General Development Management Requirements), as well as saved Rochdale UDP Policy NE/2 (Designated Sites of Ecological and Geological / Geomorphological Importance).

13.191 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to ground conditions:

- NPPF Policy P2
- Land affected by contamination PPG
- Land Stability PPG
- NPS EN-3 Paragraphs 2.12.58 – 2.12.66

Minerals Safeguarding

Assessment

13.192 A *Mineral Resource Assessment* (MRA) is submitted as part of the Application and undertakes a geological overview to assess the mineral resource potential and extent of economically viable deposits and mineral recovery potential.

13.193 The MRA concludes that shallow coal, brick clay and sandstone have been identified as safeguarded minerals that occur within Site boundaries. It indicates that the impact of the Proposed Development will be limited to a small part of the upper moorland. The reserves are overlain by peat.

13.194 MRA concludes that mineral extraction within the boundary of Site is not likely to be environmentally or financially viable. The contributing factors which lead to this

conclusion being drawn are the environmental value of the peat which would likely be significantly adversely affected during excavation of the minerals contrary to national policy objectives, the limited and diminishing demand for coal in light of UK Climate Change objectives, the prevailing topography and the existence of more accessible sandstone deposits adjacent to Scout Moor Quarry within the side slopes outside the Site. It is further noted that the proposed physical infrastructure would only occupy a small percentage of the overall Site area, would be temporary in nature and would be decommissioned after 40 years meaning that there would be no long- term sterilisation of the available resource.

Policy Compliance

13.195 In the consideration of the above it can be concluded that the Proposed Development is compliant with Policy 8 of the Greater Manchester Joint Minerals Plan and Policy M2 of the Joint Lancashire Minerals and Waste Local Plan on the basis that: the urgent need to accelerate the deployment of onshore wind generation outweighs the need to extract the mineral resources; mineral extraction would not be environmentally or economically viable and; the Proposed Development is temporary in nature and entirely reversible meaning that there would be no long term sterilisation of the mineral resource.

13.196 It is also considered to be compliant with the following other Development Plan policies, in so far as they relate to mineral safeguarding:

- Rossendale: Lancashire Minerals & Waste CS Part 1 Policies CS1 (Safeguarding Lancashire's Mineral Resources), CS2 (Minimising the need for Mineral Extraction) and CS3 (Meeting the demand for new minerals), as well as Lancashire Minerals & Waste CS Part 2 – Section 1 (Inert Waste Recycling – IWR1 Scout Moor) and Lancashire Minerals & Waste SADMP Policy DM1 (Management of Waste and Extraction of Minerals).
- Rochdale: Rochdale CS Policies G10 (Managing mineral resources), G7 (Increasing the value of biodiversity and geodiversity) and G3 (Renewable and Low Carbon Energy Developments).

13.197 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to mineral safeguarding:

- NPPF Policies M5 & M6
- Minerals PPG

Security & Crime Prevention

Assessment

13.198 The approach to site securement during the construction phase of the Proposed Development will be set out within a Construction Environmental Management Plan, secured via planning condition. In summary, this will include measures such as the installation of temporary construction fencing around working areas; the use of lighting and CCTV; on-site security personnel; and the installation of fencing and gates at the

construction compounds and staging areas to prevent unauthorised access and to manage the movement of vehicles, plant, equipment, materials and personnel.

13.199 During the operational phase, the Proposed Development will not be occupied 24/7 and therefore a series of security features and deterrents are proposed including:

- Secure access doors, anti-climb measures and alarm systems to turbine towers, preventing unauthorised access.
- The substation will be secured by a circa 3m high palisade security fence¹⁵⁰ containing secure access gates to prevent unauthorised access.

13.200 As set out within the OAMEP, working alongside the local police forces, landowners, SMWF operator and other key stakeholders, the Applicant is committed to preventing illegal off-roading on the moorland and will contribute to wider initiatives in this regard. This includes the proposed maintenance of vehicle barriers on Rooley Moor Road, as well as the proposed fencing works.

Policy Compliance

13.201 On the basis of the above assessment, the Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to security and crime prevention:

- Rossendale: Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough) and Policy TR2 (Footpaths, Cycleways and Bridleway).
- Rochdale: PFE Policy JP-P1 (Sustainable Places), as well as Rochdale CS Policies P1 (Improving Image), P3 (Improving Design of New Development) and DM1 (General Development Management Requirements).

13.202 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to security and crime prevention:

- NPPF Policy P5
- Rochdale's Urban Design SPD
- Rochdale's Public Realm Design Guide SPD

Health & Wellbeing

Assessment

13.203 A *Health Impact Assessment* (HIA) is submitted as part of the Application and describes the effects from the construction and operation of the Proposed Development in relation to health and wellbeing. In summary, it concludes that:

¹⁵⁰ 2.4m fence plus 0.6m electric topper

- Health inequalities exist within Rochdale and Rossendale and reflect the wider socio-economic inequalities within the region.
- The Proposed Development will not result in any negative impacts on the health of the existing or future population of the immediate and local areas. The aspiration is for the development of the Site to deliver long-term health and wellbeing benefits for workers, visitors and existing surrounding communities.
- The Proposed Development is assessed as making the following positive contributions to health and wellbeing:
 - Delivering substantial renewable energy generation, playing a critical role in the UK's response to the climate emergency crisis, of a scale sufficient to power the equivalent of 84,552 UK homes each year of operation.
 - Restoring and enhancing areas of peatland through a dedicated MRMP and increasing biodiversity by over 10%. The implementation of the MRMP will lead to the restoration of the moorland habitats enabling appreciation of a greater diversity of flora and fauna.
 - Enhancing access to existing green and open spaces, and delivering new routes (including public rights of way), increasing local recreational opportunities for walking, cycling, horse riding, and other non-motorised vehicles, through a dedicated OAMEP.
 - Implementing measures to reduce illegal off-road vehicle use, safeguarding the moor for legitimate users, by blending physical prevention, community education and targeted partnership support.
 - Producing a Community Benefits Charter and linked Community Wealth Fund, incorporating findings from community consultation, to make financial contributions to community initiatives that best-respond to local needs and aspirations.
 - Delivering employment and supply chain opportunities for local people and businesses at every stage of the project's lifecycle, seeking – as set out in the Community Benefits Charter – to maximise local impacts through extensive engagement with public bodies, communities and other stakeholders. Opportunities to successfully access education, training and employment are a fundamental component of an individual's health and wellbeing; the creation of such being particularly important in locations with relatively high levels of deprivation and higher instances of poor health and wellbeing.
- In addition, the Proposed Development will further support health & wellbeing through the following measures:
 - Cubico continuing to engage with local communities, voluntary organisations and other stakeholders to establish uses and scope of the Community Wealth Fund.

- Production of a Construction Environmental Management Plan and Construction Traffic Management Plan – to be secured through planning condition – and implementation of measures identified therein to minimise construction impacts such as dust, noise, vibration and odours; detail building materials recycling and other circular economy initiatives that will be implemented; and detail other best-practice sustainable construction techniques that will be implemented.
- Production of an Operational Noise Management Plan – to be secured through planning condition – and implementation of measures to ensure that no exceedances of relevant noise limits will occur.
- Seek to maximise employment, skills and training opportunities for local people via local procurement arrangements as the proposals progress, implementing initiatives set out in the Community Benefits Charter and through ongoing engagement with RMBC, RBC, the GMCA, LCC and other stakeholders.

Policy Compliance

13.204 On the basis of the above assessment, the Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to health and wellbeing:

- Rossendale: Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough) and Policy ENV6 (Environmental Protection).
- Rochdale: PFE Policies JP-P1 (Sustainable Places) and JP-P6 (Health), as well as Rochdale CS Policies C6 (Improving Health and Wellbeing), DM1 (General Development Management Requirements) and G3 (Renewable and Low Carbon Energy Developments).

13.205 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to health and wellbeing:

- NPPF Policies DP3 and P3
- Healthy & Safe Communities PPG
- NPS EN-1 Section 4.4

Climate Change & Sustainability

Assessment

13.206 A *Sustainability, Energy & Climate Change Statement*, prepared by Turley Sustainability & ESG, is submitted with the Application. This presents a summary of the conclusions of the wider Application documentation, in so far as they relate to ‘sustainability’, in respect of the following environmental topics:

- Green House Gas emissions, savings and clean energy generation

- Ecology
- Ornithology
- Outline Habitat Management and Monitoring Plan
- Moorland Restoration and Management Plan
- Biodiversity Net Gain
- Outline Peat Management Plan
- Flood Risk Assessment
- Drainage Strategy
- Ground conditions
- Archaeology
- Transport
- Noise & Vibration
- Air quality

13.207 For the sake of brevity, these conclusions are not replicated here as they are set out in detail elsewhere in this section of the PDAS. However, the *Sustainability, Energy & Climate Change Statement* concludes that the Proposed Development as a whole is considered to represent ‘sustainable development’ in line with the definition established in the NPPF.

Policy Compliance

13.208 On the basis of the above assessment, the Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to sustainability:

- Rossendale: Rossendale LP Strategic Policies SD1 (Presumption in Favour of Sustainable Development) and ENV1 (High Quality Development in the Borough), as well as Policy ENV7 (Wind Turbines)
- Rochdale: PFE Policies JP-S1 (Sustainable Development), JP-S2 (Carbon and Energy), JP-S6 (Resource Efficiency) and JP-P1 (Sustainable Places), as well as Rochdale CS Policies SD1 (Delivering Sustainable Development), P3 (Improving design of new development) and G3 (Renewable and low carbon energy developments).

13.209 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to sustainability:

- NPPF Policies CC2, CC3, DP3, TR1, F2, F8, N2
- United Nations Sustainable Development Goals (‘UN SDGs’)¹⁵¹, including:
 - SDG 7: Affordable and Clean Energy
 - SDG 9: Industry, Innovation and Infrastructure
 - SDG 11: Sustainable Cities and Communities

- SDG 12: Responsible Consumption and Production
- SDG 13: Climate Action
- SDG 15: Life on Land
- Climate Change PPG
- The Climate Change Act 2008
- Rossendale Only:
 - Rossendale’s Climate Change SPD
 - Rossendale Climate Change Strategy (2020)¹⁵²
- Rochdale Only:
 - Greater Manchester Five-Year Environment Plan 2025-2030
 - Rochdale’s Climate Change Adaptation SPD
 - Rochdale Climate Change Strategy & Delivery Plan 2021-25¹⁵³

Waste Management

Assessment

13.210 A *Sustainability, Energy & Climate Change Statement*, prepared by Turley Sustainability & ESG, is submitted with the Application. In respect of waste management and circular economy, it confirms:

- In order to help promote waste minimisation and circular economy principles for the Proposed Development, the Applicant has utilised DNV’s ReWind software¹⁵⁴ which seeks to maximise circularity of wind energy projects at lowest cost. The assessment is based on a 5.7 MW Nordex N149 candidate turbine, together with information on the wider Proposed Development regarding turbine foundations, access tracks, cables, and site decommissioning proposals.
- Some 32,543 tonnes of material are forecast to arise from the Proposed Development at decommissioning, of which 29,730 tonnes are forecast to be recovered, resulting in overall “project circularity” of 91.36%.
- Calculating the circularity percentage of a wind farm gives a measure of the proportion of the Proposed Development that can be usefully recycled, re-used or recovered at the end-of-life and that will not end up in landfill.
- DNV defines circularity as any material processing activity which avoids waste material from the wind farm going to landfill. When defined in terms of the

¹⁵² https://www.rossendale.gov.uk/downloads/file/16648/rossendale_council_climate_change_strategy

¹⁵³ <https://www.rochdale.gov.uk/downloads/file/1120/climate-change-strategy-and-delivery-plan>

¹⁵⁴ <https://store.veracity.com/rewind>

waste hierarchy this means that the following activities are considered circular: re-use – recycle – recover.

- DNV's ReWind circularity analysis concludes that ~90% of the turbine materials are recyclable, ~93% of turbine foundations are recyclable, ~70% of the substation is recyclable, ~65% of array cables and ~70% of the export cables are recyclable, resulting in a forecast overall project circularity of ~91.36%.
- Three potential waste material processing facilities have been identified for the primary waste materials, namely metals, blades and concrete. These are: EMR Group, Rochdale (ferrous and non-ferrous metals); Enva, Ayrshire (turbine blades), and; Enva, Manchester (ferrous metals, non-ferrous metals and non-metal wastes). The location(s) at which materials recovery and recycling is undertaken will depend on which waste processing facilities are available following decommissioning of the Proposed Development. On this basis, further details are proposed to be confirmed through a Decommissioning Waste Management Strategy, to be secured via planning condition.

Policy Compliance

13.211 On the basis of the above assessment, the Proposed Development is in full compliance with the following Development Plan policies, in so far as they relate to waste management:

- Rossendale: Lancashire Minerals & Waste CS Policy CS7 (Managing our Waste as a Resource)
- Rochdale: PFE Policies JP-S6 (Resource Efficiency) and JP-P1 (Sustainable Places), as well as Rochdale CS Policy G11 (Managing Waste) and the Greater Manchester Joint Waste Development Plan Document

13.212 On the basis of the above assessment, the Proposed Development is also in full compliance with the following other material considerations, in so far as they relate to waste management:

- National Planning Policy for Waste (Section 5)
- Waste PPG
- NPS EN-1 Section 5.15

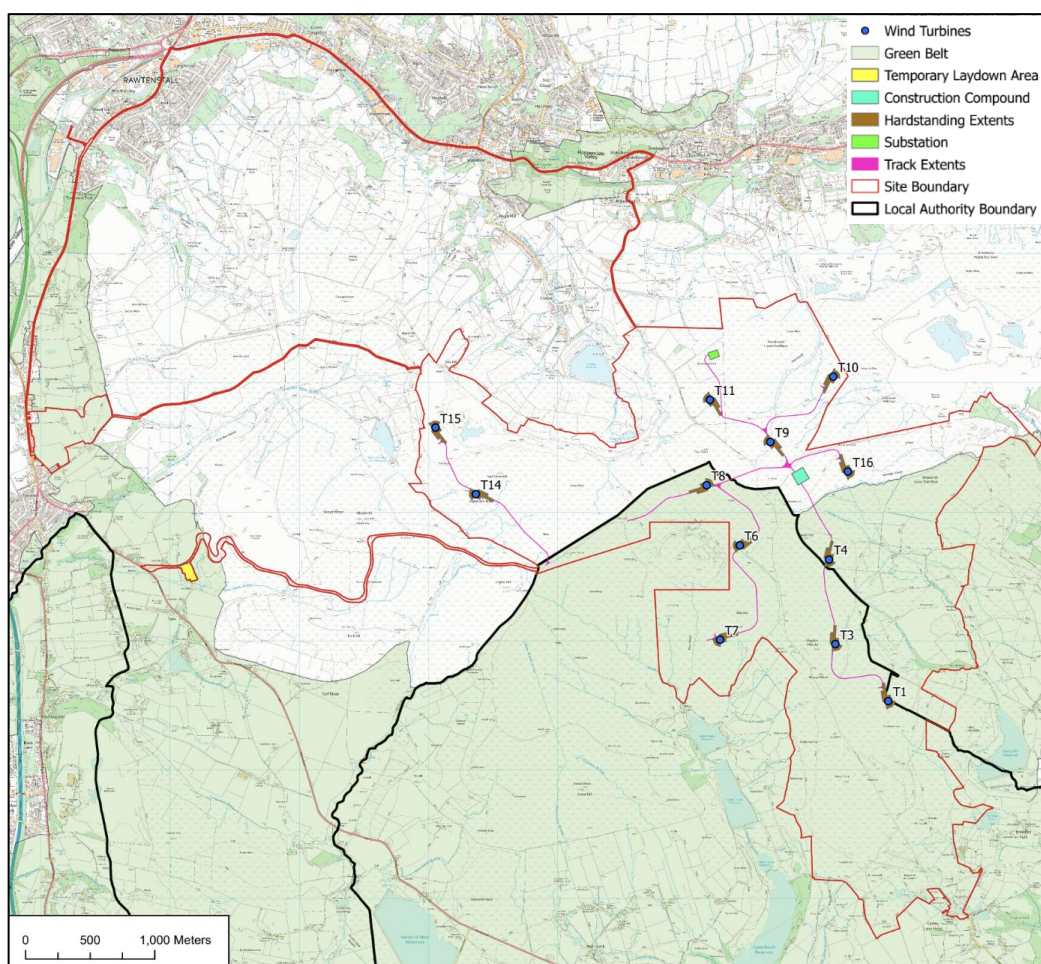
14. Green Belt Assessment

- 14.1 This section considers the principle of development by appraising the Proposed Development against Green Belt policies contained within the Development Plan and the NPPF.

Proposed Development Components in the Green Belt

- 14.2 As set out in Section 9, the Site is partially located within the Green Belt, comprising approximately 582ha of land in total (182ha in Rossendale and 399ha in Rochdale)¹⁵⁵ (**Figure 14.1** and **Appendix 3**).

Figure 14.1: Extent of Development within the Green Belt



- 14.3 The components of the Proposed Development which are located within the Green Belt are summarised in **Table 14.1**.

¹⁵⁵ This represents approximately 56.9% of the total Site area (1,023.34ha), 29.2% of the total land area within Rossendale (623.7ha) and 100% of the total land area within Rochdale (399.64ha).

Table 14.1: Infrastructure in the Green Belt

Rossendale Green Belt	Rochdale Green Belt
1no. turbine (T4) and its associated crane pad hardstanding	5no. turbines and associated crane pad hardstanding (T1, T3, T6, T7 & T8)
Part of the crane pad hardstanding for turbine T1	Part of the crane pad hardstanding for turbine T4
0.64km of new access track (including the Rooley Moor Road Crossing) and 0.59km of existing access track, with underground 33kV electrical and fibre cabling running parallel to these tracks	4.25km of new access track and 0.78km of existing access track, with underground 33kV electrical and fibre cabling running parallel to these tracks
Part of the engineering and improvement works to Scout Road	1.64km of Grid Connection Route C1 (underground)
Temporary Construction Staging / Laydown Area	16.94ha of 'controlled' moorland restoration
1.12km of Grid Connection Route A (underground)	New fencing and boundary treatments
2.03km of Grid Connection Routes C1/C2 (underground)	Outdoor access physical enhancement works, including: • Moor Cock Inn Rest Area • Greenbooth Car Park Enhancement Works • Reinforced Vehicle Barrier to prevent unauthorised access to RMR from the South • Interpretation panels and on-site signage • CCTV cameras
24ha of 'controlled' moorland restoration	
New fencing and boundary treatments	
Outdoor access physical enhancement works, including: • Interpretation panels and on-site signage • CCTV cameras	

Policy Context

- 14.4 The Government places significant emphasis on the protection of the Green Belt, with their primary purpose being to prevent urban sprawl by keeping land permanently

open (NPPF Chapter 13). Policy GB2 of the NPPF confirms that the Green Belt serves five purposes:

- Purpose a: To check the unrestricted sprawl of large built-up areas
- Purpose b: To prevent neighbouring towns merging into one another
- Purpose c: To assist in the safeguarding of the countryside from encroachment
- Purpose d: To preserve the setting and special character of historic towns
- Purpose e: To assist in urban regeneration by encouraging the recycling of derelict and other urban land

14.5 Inappropriate development will only be permitted in "Very Special Circumstances" (VSC), which can only be demonstrated if the harm caused to the Green Belt through inappropriateness, along with any other associated harm, is clearly outweighed by other material considerations (NPPF Policy GB6).

14.6 NPPF Policy GB6 (paragraph 3) confirms that *"in the case of proposals for renewable and low carbon energy development, very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources"*.

14.7 NPPF Policy GB7 confirms that the following types of development are not regarded as inappropriate, and therefore should not be regarded as harmful to the Green Belt or be required to demonstrate very special circumstances (provided the impact on the openness of the Green Belt is minimised, and there would not be a significant conflict with the Green Belt purposes):

- Engineering operations required in a Green Belt location;
- Electricity network infrastructure required in a Green Belt location; and
- The provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor recreation.

14.8 The importance of the Green Belt is also confirmed in the Development Plan as follows:

- Rossendale: although there is no specific policy within the Rossendale LP relating to what constitutes inappropriate or appropriate development within the Green Belt, there is an expectation that all new development in the Borough will take place within the Urban Boundaries, defined on the Rossendale LP Policies Map, except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area (Rossendale LP Strategic Policy SD2 (Urban Boundary and Green Belt)).

- Rochdale¹⁵⁶:
 - PfE Policy JP-G9 (The Green Belt) reiterates the five purposes of the Green Belt as set out in the NPPF (Policy GB2) and confirms that the *“beneficial use of the Green Belt will be enhanced where this can be achieved without harm to its openness, permanence or ability to serve its five purposes. In particular, the enhancement of its green infrastructure functions will be encouraged, such as improved public access and habitat restoration, helping to deliver environmental and social benefits for our residents and providing the high quality green spaces that will support economic growth.”*
 - PfE Policy JP-G2 (Green Infrastructure Network) confirms that *“development which involves the removal of land from the Green Belt (including allocations proposed in this plan) will be required to offset the impact of removing land from the Green Belt through identifying and delivering compensatory improvements to the environmental quality and accessibility of remaining Green Belt in the vicinity of the site”*.

14.9 It is also important to note that NPS EN-1 reiterates NPPF Green Belt policy and confirms:

- *“Although the re-use of previously developed land for new development can make a major contribution to sustainable development by reducing the amount of countryside and undeveloped greenfield land that needs to be used, it may not be possible for many forms of energy infrastructure (paragraph 5.11.3).*
- *Very special circumstances are not defined in national planning policy as it is for the individual decision maker to assess each case on its merits and give relevant circumstances their due weight. However, when considering any planning application affecting Green Belt land, the Secretary of State should ensure that substantial weight is given to any harm to the Green Belt when considering any application for such development, while taking account, in relation to renewable and linear infrastructure, of the extent to which its physical characteristics are such that it has limited or no impact on the fundamental purposes of Green Belt designation. Very special circumstances may include the wider environmental benefits associated with increased production of energy from renewables and other low carbon sources (paragraph 5.11.36)”*.

14.10 The VSC test has been reviewed on several occasions by the courts. However, the principles are now well-established, with the test requiring a broad discretion on the part of the decision-maker.

14.11 In *R (on the application of Temple) v Basildon District Council* [2004] EWHC 275929 (Admin) Sullivan J (as he then was)¹⁵⁷ observed:

¹⁵⁶ PfE Appendix A confirms that Rochdale CS Policy G4 (Protecting Green Belt land) is wholly superseded by PfE Policy JP-G9 (The Green Belt).

¹⁵⁷ [Basildon District Council, R \(on the application of\) v Temple \[2004\] EWHC 2759 \(Admin\) \(08 November 2004\) \(bailii.org\)](#)

“...the decision-taker must be able to point to a circumstance, or combination of circumstances which, viewed objectively, is reasonably capable of being described as ‘very special’,” (paragraph 15)

“The short answer to the claimant’s argument is that in planning, as in ordinary life, a number of ordinary factors may when combined together result in something very special. Whether any particular combination amounts to very special circumstances...will be a matter for the planning judgement of the decision-taker” (paragraph 17)

“...The question is not merely whether there are very special circumstances, but whether those circumstances clearly outweigh the harm done by reason of inappropriateness and any other harm. Thus, a combination of factors which amounted to special circumstances might be sufficient to clearly outweigh the limited degree of harm that would be caused by granting planning permission upon one particular site, but the same or a similar combination of factors might well be insufficient to justify the grant of planning permission for a site that was more harmful in planning terms, for example because it had a greater impact upon the underlying objectives of the Green Belt; it was more harmful in terms of the character or appearance of the countryside; it had a greater effect upon residential amenity and/or highway safety, etc.” (paragraph 18)

- 14.12 The judgment clarifies that, although individual factors may be considered ordinary, their combined effect could clearly outweigh the harm caused by development proposals in the Green Belt, including harm arising from inappropriateness, thus satisfying the VSC test.
- 14.13 This approach was confirmed in *Sefton MBC v SSHCLG* [2021] EWHC 108230 (Admin)¹⁵⁸, the High Court further observed that NPPF does not “require a particular mathematical exercise nor do they require substantial weight to be allocated to each element of harm as a mathematical exercise with each tranche of substantial weight then to be added to a balance”. The Court further stated that the remaining task requires a “single exercise of judgement to assess whether there are very special circumstances which justify the grant of permission notwithstanding the importance of the Green Belt”.

Green Belt Assessment Criteria

- 14.14 In accordance with national policy, the potential harm to the Green Belt must be assessed in relation to the following factors:
- Green Belt harm, which includes:
 - The definitional harm resulting from any inappropriate development in the Green Belt
 - The impact on the openness of the Green Belt

¹⁵⁸

[Sefton Metropolitan Borough Council v Secretary of State for Housing, Communities, and Local Government \[2021\] EWHC 1082 \(Admin\) \(07 May 2021\) \(bailii.org\)](#)

- The impact on the purposes of including land within the Green Belt
 - Any other harms arising from the proposal
- 14.15 It is also necessary to consider the extent to which the Proposed Development is aligned with national policy objectives which encourage the beneficial use of Green Belt land (NPPF Policy GB5) and local policy objectives relating to compensatory measures to improve the environmental quality and accessibility of land remaining within the Green Belt.
- 14.16 The following sub-sections address each in turn below and subsequently consider whether there are 'other considerations' of sufficient weight to outweigh the identified harms, such that VSC can be considered to exist.

Green Belt Harm

Definitional Harm

- 14.17 NPPF Policy GB6 states that LPA's should regard the construction of new buildings as inappropriate development in the Green Belt. NPPF Policy GB7 then provides a closed list of 'exceptions' (i.e. development that would not be inappropriate development in the Green Belt).
- 14.18 The proposed peat and moorland restoration works (41.10ha), alongside the woodland landscape buffer to the onsite substation, would not comprise built development and would not, therefore, be inappropriate. Furthermore, in accordance with NPPF Policy GB7, the engineering works associated with the Proposed Development – comprising the construction of new access tracks and associated earthworks operations; the improvement works to the existing access tracks; the formation of crane pad hardstandings and associated foundations; the installation of the below ground cabling and grid connection infrastructure; and the formation of the temporary construction laydown area – are not inappropriate development. All other components of the Proposed Development which are located within the Green Belt (as listed in **Table 14.1**) are therefore, by definition, inappropriate development.
- 14.19 In assessing definitional harm regard has been had to the development when considered in totality / as a whole. **Substantial weight** should be given to the definitional harm which arises in this case, in accordance with NPPF Policy GB6.

Harm to Openness

- 14.20 Maintaining the openness of the countryside is a fundamental objective of Green Belt policy. Case law has addressed the inappropriateness of development in relation to 'openness,' confirming that the impact of development on openness must not be assessed solely in spatial terms but must also take into account its visual impact. In *Samuel Smith Old Brewery (Tadcaster) v North Yorkshire CC [2018] EWCA Civ 489*, the Court of Appeal¹⁵⁹ stated that:

¹⁵⁹ Samuel Smith Old Brewery (Tadcaster) v North Yorkshire CC [2018] EWCA Civ 489 (NB this aspect of the judgment not impacted by the judgment of the Supreme Court: [2020] UKSC 3.

‘Whether, in the individual circumstances of a particular case, there are likely to be visual as well as spatial effects of the openness of the Green Belt, and if so, whether those effects are likely to be harmful or benign, will be for the decision-maker to judge. But the need for those judgements to be exercised is in, my view inherent in the policy.’

14.21 The effect of the Proposed Development as a whole on openness of the Green Belt is considered below:

- The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. This is achieved by protecting its intrinsic openness (the absence of built development) rather than visual amenity (experience or asset) or the visual quality of land or the landscape. On this basis, the Proposed Development will be harmful to openness.
- However, the Green Belt PPG¹⁶⁰ indicates that an assessment of the impact on openness should consider the duration of the development and its ‘remediability’, taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness. In this instance, the Proposed Development is proposed for a temporary 40-year permission, and the Applicant proposes a planning condition to secure a site restoration strategy meaning that the impacts are entirely reversible.
- Whilst the turbines would be relatively slender structures and whilst they would be well spaced with a high degree of visual permeability retained between each turbine, having regard to their number, scale, kinetic element and spatial distribution it can be concluded that **substantial harm** would be caused to the openness of the Green Belt and that this harm should be afforded **substantial weight** in the decision making process, in accordance with NPPF Policy GB6 (paragraph 2), albeit this harm would be temporary and entirely reversible upon decommissioning and site restoration.
- The identified harm to openness is inevitable. National Planning and Energy Policy stresses the need for additional wind turbines and the urgency of deployment. Given that wind turbines can only be located where there is an adequate and available wind resource and given the multitude of other factors which constrain the location of wind turbines it is inconceivable that the Government’s stated objectives can be achieved without the use of Green Belt land. To the extent that the use of Green Belt land for onshore wind is inevitable it therefore follows, logically, that harm to openness would inevitably arise from any wind energy scheme.

Impact on the Purposes of Including Land within the Green Belt

14.22 This section considers the impact of the Proposed Development on the purposes of the Green Belt. It has regard to the published Green Belt Assessments for this area of Green Belt, which include the Rossendale Green Belt Review¹⁶¹ (‘RGBR’) and the

¹⁶⁰ Department for Levelling Up, Housing and Communities (February 2025) – [Green Belt Planning Practice Guidance](#), Paragraph: 013 Reference ID: 64-013-20250225.

¹⁶¹ [Rossendale Green Belt Review - November 2018](#)

Greater Manchester Green Belt Assessment¹⁶² ('GMGBA') – the findings of which are summarised at **Appendix 4** of this PDAS.

- 14.23 **Table 14.1** assesses the impact of the Proposed Development on the purposes of including land within the Green Belt.

Table 14.2: Assessment of Impact on Purposes of Including Land within the Green Belt

Purpose	Assessment
(a) To check the unrestricted sprawl of large built-up areas	As set out at Appendix 4, the published Green Belt Assessments have not considered the role this area of Green Belt makes in respect of the prevention of urban sprawl as it is separated from the urban edge by intervening parcels. The Proposed Development will not contribute to urban sprawl and the purpose of the Green Belt in this regard would not be materially affected. While the turbines and other equipment will undoubtedly introduce additional man-made features into this area of the Green Belt, they represent specific elements of infrastructure not commonly associated with urban areas and which is more commonly located in open landscapes. Furthermore, they will be viewed in close association with the existing operational SMWF. On this basis, it can be concluded that the Proposed Development raises no material harm to purpose (a) and even if a contrary view were to be formed the weight to be attached would be reduced by virtue of the temporary nature and reversibility.
(b) To prevent neighbouring towns from merging into one another	As set at Appendix 4, the RGBR confirms that this area of the Green Belt makes no contribution to this purpose. However, the GMGBA confirms that the Rochdale parcel makes a strong contribution. The turbines of the scale proposed are commonly associated with rural rather than urban areas and would not encourage or result in any physical or visual merging of surrounding settlements or any perception thereof.

Purpose	Assessment
	On this basis, it can be concluded that the Proposed Development raise no material harm to purpose (b) and even if a contrary view were to be formed the weight to be attached would be reduced by virtue of the temporary nature and reversibility.
(c) To assist in the safeguarding the countryside from encroachment	As set at Appendix 4, the published Green Belt Assessments confirm that this area of Green Belt performs strongly in respect of purpose c. The proportional land take of the Proposed Development is considered by the applicant to be very limited, and the ‘harm’ in terms of encroachment to the countryside is accordingly limited. Furthermore, the encroachment is finite. It would not lead to or encourage any further loss of Green Belt land (as other urban development may encourage or set a precedent for), nor would it undermine the future appearance or function of the land as countryside. As such, whilst it is acknowledged that some encroachment would occur, the extent of the harm arising from this encroachment is considered to be limited. It is material to the balancing exercise that this harm would be temporary, limited to the operational period of the wind farm (40 years) and entirely reversible. On this basis, it can be concluded that the Proposed Development raises limited - moderate harm to purpose (c).
(d) To preserve the setting and special character of historic towns	There is no precise definition offered within the NPPF of what is deemed to constitute a ‘historic town’, beyond the Green Belt PPG¹⁶³ confirming that this purpose only relates to ‘towns’ and not ‘villages’.

¹⁶³ Department for Levelling Up, Housing and Communities (February 2025) – [Green Belt Planning Practice Guidance](#), Paragraph: 005 Reference ID: 64-005-20250225.

Purpose	Assessment
	A ‘historic town’ is not a designated heritage asset in itself (for the purposes of NPPF policy), though it may (and is likely to) contain one or more conservation areas, listed buildings and other heritage assets. Guidance from the Local Government Association and the Planning Advisory Service (2015)¹⁶⁴ confirmed that this purpose applies to very few settlements in practice. The Green Belt in Rossendale was established in the 1979 North East Lancashire Structure Plan which identified the main role of the Green Belt as being to protect settlements from coalescing, to manage urban sprawl and to create recreational opportunities – not the preservation of the character and setting of historic towns. The broad extent of the Green Belt in Greater Manchester appeared in draft in the 1978 Greater Manchester Structure Plan, approved by the Secretary of State in 1981 with the primary purposes of the Green Belt set out in the plan being aligned to national policy including to preserve the special character of a town (as the purpose was then phrased). As set out at Appendix 4, the published Green Belt Assessments indicate that this area of Green Belt performs as follows, though it is noted that both the Rossendale and Greater Manchester GBAs pre-date the 2025 PPG and the guidance it provides on assessing the contribution made to this purpose: • Rossendale: moderately in respect of purpose (d). The Assessment notes theoretical intervisibility with the historic settlements of Bacup Town Centre, Rochdale Town Centre, Wardle, and Whitworth Square, but identifies that in practice, it is the higher ground located within this area that has good intervisibility with Whitworth Square. It concludes that the Green Belt in this area forms a part of Whitworth Squares’ wider setting and the openness of the land contributes positively the historic significance and special character of this settlement, albeit to a relatively limited degree. • Rochdale: strongly in respect of purpose (d). The Assessment notes theoretical intervisibility with the historic settlements of Ramsbottom, Rochdale

¹⁶⁴ Local Government Association and the Planning Advisory Service (2015). Planning on the Doorstep: The Big Issues – Green Belt)

Purpose	Assessment
	Town Centre, Rowlands and Wardle, the Greater Manchester Green Belt Assessment but identifies in practice that, the area has good intervisibility with the historic settlement areas located within the towns of Rochdale and Bury. Whitworth Square is described as a ‘small rural hamlet’ and a village within its Conservation Area Appraisal and was not included in the Lancashire Historic Town Survey Programme. Wardle and Rowlands are also villages and therefore in accordance with the Green Belt PPG, these settlements are not relevant for the purposes of assessing the impact of the Proposed Development on Green Belt purpose (d)
	The only historic towns which the Green Belt Assessments identify intervisibility in practice are Rochdale Town and Bury Town Centres. In considering heritage assets to be included within the Heritage Assessment, consideration was given of assets within Rochdale and Bury Town Centre including through a review of the Zone of Theoretical Visibility (ZTV) alongside site visits to understand intervisibility in practice. This identified that there would be only limited, patchy visibility of the Project for assessment from these areas. It was concluded that although there are some limited locations from which the Site and / or the Proposed Development may be visible in combination with heritage assets within these urban areas, the Main Site does not contribute to their significance which would be unaffected by the Proposed Development. The <i>Heritage Assessment</i> (summarised in Section 13 of this PDAS) therefore did not assess the effects upon any heritage assets within Rochdale Town centre or Bury Town Centre.
	The Rossendale GBA identifies a theoretical visual relationship with Bacup Town Centre but concludes that this area of Green Belt does not contribute to the setting or significance of Bacup in practice.
	A theoretical visual relationship is also identified with Ramsbottom. From Ramsbottom, the Proposed Development would be visible beyond the existing turbines of the Scout Moor Wind Farm. Review of the

Purpose	Assessment
	ZTV, which was checked through site visits, identified that there would be only patchy visibility of the Proposed Development from Ramsbottom. It was concluded that although there are some limited locations from which the Site and / or the Proposed Development may be visible in combination with heritage assets within Ramsbottom, the Main Site does not contribute to their significance and the overall experience of the assets' and the town's setting would not change. On this basis, it can be concluded that the Proposed Development would give rise to only very limited harm to purpose (d). The weight to be attached would be reduced by virtue of the temporary nature and reversibility of the Proposed Development. It is material to the determination of the Applications, that following further detailed appraisal and consideration of purpose (d) that the level of harm has been reduced from moderate (2025 Submission) to very limited (FEI Submission).
(e) To assist urban regeneration by encouraging the re-use of derelict and other land.	Although not making a direct contribution to urban regeneration, the Proposed Development will not in any way discourage nor prevent the regeneration of derelict and other urban land. On this basis, it can be concluded that the Proposed Development raises no material harm to purpose (e).

- 14.24 On balance, therefore, the Proposed Development could be considered to raise a conflict with two stated Green Belt purpose, namely purpose (c) safeguarding the countryside from encroachment and purpose (d) preserving the setting and special character of historic towns.
- 14.25 The extent and effects of encroachment arising from the physical development of the wind turbines and associated infrastructure is, however, limited-moderate; both in scale in the context of the wider Green Belt and in the nature of the development itself which will ensure that the character of the site remains distinctively different from urbanised land beyond the Green Belt.
- 14.26 In accordance with NPPF Policy GB6(2), the weight to be given to the identified harm is, therefore, **substantial**.

Conclusion on Green Belt Harm

- 14.27 In summary, it is considered that the Proposed Development would result in the following impacts on the Green Belt, which collectively are to be afforded **substantial weight** in the planning balance.

Table 14.3: Summary of Impacts on Green Belt Purposes

Consideration	Assessment
Definitional Harm to the Green Belt by virtue of inappropriate development	The Proposed Development constitutes ‘inappropriate development’ and therefore there is ‘definitional harm’, which attracts substantial weight.
Openness of the Green Belt	Substantial harm, which attracts substantial weight.
Purpose A: Checking unrestricted sprawl	No harm
Purpose B: Preventing towns from merging	No harm
Purpose C: Safeguarding the countryside from encroachment	Limited – moderate harm, which attracts substantial weight.
Purpose D: Preserving the setting of historic towns	Very limited harm, which attracts substantial weight.
Purpose E: Promoting urban regeneration	No harm
Overall harm to Green Belt purposes	Limited – moderate harm, which attracts substantial weight.

Assessment of ‘Other Harm’

- 14.28 NPPF Policy GB6(2) advises that very special circumstances [to justify inappropriate development in the Green Belt] *“will not exist unless the potential harm to the Green Belt by reason of inappropriateness, **and any other harm** resulting from the proposed development, is clearly outweighed by other considerations”* [emphasis added].
- 14.29 Sections 10-13 of this PDAS present an overview of the conclusions from various technical assessments, which evaluate the potential impact of the Proposed Development on relevant technical and environmental factors. It confirms the extent to which the Proposed Development may cause ‘other harm’ to be weighed in the overall planning balance alongside the above Green Belt assessment.
- 14.30 In summary, the following additional ‘harm’ has been identified:
- Harm to landscape character – the identified harm is afforded substantial weight (in accordance with NPPF Policy NE4).

- Harm to visual amenity – the identified harm is afforded moderate weight.
- Harm to built heritage – the level of harm to the significance of these assets varies, but in all cases it is below the bar of ‘substantial harm’ as set out in NPPF. Notwithstanding this, and having regard to the statutory duties outlined in Section 13, this harm is afforded substantial weight (in accordance with NPPF Policy HE6).
- Harm to archaeological remains – the identified harm would not be significant and should only be afforded moderate weight.
- Residual effects to ecology – the identified harm would not be significant and should only be afforded very limited weight.
- Residual effects to ornithology – the identified harm would not be significant and should only be afforded very limited weight.
- Residual harm to some watercourses/ waterbodies – the identified harm would be minor and not significant and attracts very limited weight.
- Potential effect from shadow cast on horses and riders – the identified harm would not be significant and should only be afforded very limited weight.

Beneficial use of land in the Green Belt

- 14.31 NPPF Policy GB5 confirms that *“Green Belt land should provide benefits for communities and nature”*, and sets out that Development Plans should set out *“opportunities to improve the environmental quality, secure improved public access to greenspace, including for outdoor sport or recreation, allotments and community food production, within the Green Belt”* and *“how the Green Belt can contribute to the priorities for nature recovery set out within relevant Local Nature Recovery Strategies”*.
- 14.32 Rossendale LP Strategic Policy SD2 (Urban Boundary and Green Belt) and Policy SD4 (Green Belt Compensatory Measures) set out an expectation that development within the Green Belt provides ‘compensatory measures’ to improve the environmental quality and accessibility of land remaining within the Green Belt.
- 14.33 PfE Policy JP-G2 (Green Infrastructure Network) confirms that development that involves the removal of land from the Green Belt will be required to offset the impact of removing land from the Green Belt through identifying and delivering compensatory improvements to the environmental quality and accessibility of remaining Green Belt in the vicinity of the site. Details of specific sites and projects will be established in discussion with the relevant Local Authority (i.e. RMBC).
- 14.34 This is an encouragement to make better use of Green Belt land within the context of its principal purposes. The extent to which the Proposed Development will contribute to the beneficial use of land in the Green Belt, and provide compensatory improvements the environmental quality and accessibility of land remaining within the Green Belt, is a material consideration and is assessed below.

Opportunities to improve the environmental quality

- 14.35 The implementation of the MRMP is an integral element of the Proposed Development. A significant proportion of the land identified for improvement through the MRMP is located within the Green Belt (a total of 40.94ha). This represents approximately 35% of the total controlled restoration area (116.7ha).
- 14.36 This will deliver net gains to biodiversity and landscape fabric: there will be more plant species, more flowers and seeds, less bare eroding peat, and more animals to see for visitors to the moor. The moorland would also be more resilient to wildfire and more effective in sequestering carbon dioxide. These restorative benefits would be permanent and endure beyond the operational lifetime of the Proposed Development.
- 14.37 The requirement for, aims and objectives, and benefits of the MRMP are discussed in detail at Section 7 of this PDAS.
- 14.38 Having regard to the detail of the MRMP and the summary presented it can be concluded that the Proposed Development will result in the restoration of a significant improvements to environmental quality. Such improvements would not arise without the Proposed Development.
- 14.39 The Proposed Development therefore achieves compliance with this policy objective when consideration is given to the temporary and reversible nature of adverse effects and the long-term benefits of the moorland restoration works.

To secure improved public access to greenspace, including for outdoor sport and recreation

- 14.40 The Proposed Development, as a whole, will secure a number of significant improvements to public access across the moorland. These improvements are set out in detail in the *Outdoor Access Management & Enhancement Plan* (as summarised in Section 7 of this PDAS). Within the Green Belt this includes:
- 4.74km (0.53km in RBC and 4.21km in RMBC) of multi-user access tracks, available to the public during the operational phase of the Proposed Development.
 - Part of the new permissive public footpath / bridleway connection.
 - A new public amenity area (in RMBC).
 - New interpretation and learning infrastructure, including directional signage.
 - Improvements to Greenbooth Reservoir Car Park (in RMBC).
- 14.41 These improvement works form part of the wider strategy for outdoor access, summarised in full in Section 7 of this PDAS, which have been devised in line with feedback provided from key user groups and through public consultation. Collectively, these works (both those elements within and outside of the Green Belt) provide a comprehensive package of improvements to recreational infrastructure for walkers, cyclists, horse riders and other users of the Site and in its vicinity, supporting the enhancement of access to the Green Belt.

- 14.42 The Proposed Development is therefore consistent with the policy objectives of providing for access and for creating opportunities for outdoor sport and recreation.

Conclusion on the Beneficial Use of the Green Belt and Compensatory Measures

- 14.43 On the basis of the above, the Proposed Development accords with the requirements of the Development Plan in respect of Green Belt compensation measures (Rossendale LP Strategic Policy SD2 and Policy SD4, as well as PFE Policy JP-G2). It is also in accordance with relevant other material considerations, including NPPF Policy GB5, the Green Belt PPG, NPS EN-1 (Section 5.11) and Rossendale's Compensatory Measures for Green Belt Release Guidance.

Very Special Circumstances

- 14.44 In order for the VSC to exist, the totality of any harm identified must be clearly outweighed by the benefits / material considerations supporting the Proposed Development.
- 14.45 As the courts have noted, the material considerations do not themselves all have to be "very special", they can indeed be ordinary when considered individually. However, when considered cumulatively they must clearly outweigh the harm identified such that, overall, the VSC necessary for a grant of planning permission in the Green Belt exists.
- 14.46 The VSC in this case is comprised of the following component elements:
- **VSC 1:** The Proposed Development will contribute to addressing the national need for new onshore wind energy generation capacity. By providing a clean, renewable source of energy generation, and benefiting from a confirmed grid connection by 2030, it will support the achievement of legal obligations and policy goals related to climate change, while also enhancing national energy security.
 - **VSC 2:** The Proposed Development will contribute to achieving Climate Emergency objectives, particularly by reducing greenhouse gas emissions.
 - **VSC 3:** The restoration of a substantial area of severely degraded peat moorland through the implementation of a *Moorland Restoration and Management Plan* to the benefit of biodiversity, water quality, grazing stock, carbon sequestration and the visual and recreational amenity of the moor for its users. These are benefits which would not be realised without the Proposed Development. In the alternative of a 'do-nothing' scenario the moorland will continue to degrade to the detriment of the natural environment.
 - **VSC 4:** The Proposed Development will also contribute to the enhancement of the local biodiversity through the incorporation of habitat creation and enhancement through biodiversity net gain.
 - **VSC 5:** The Proposed Development will deliver a range of enhancements to public access and recreation on the Moorland.

- **VSC 6:** The socio-economic benefits arising from the Proposed Development.
- **VSC 7:** The temporary nature of the Proposed Development, along with the reversibility of its identified impacts upon decommissioning and the subsequent reinstatement of the Site, ensures minimal long-term effects.

VSC 1: Contribution to meeting a national, regional and local need for renewable energy generation from onshore wind.

- 14.47 As set out in Sections 2 and 10 of this PDAS, the UK Government has set out clear intentions for maximising the delivery of new renewable energy generation and supply infrastructure.
- 14.48 To achieve its 'net-zero' goals and to enhance domestic energy security, the Government has released numerous policy documents and strategies aimed at supporting the increased deployment of renewable and low-carbon energy sources in suitable locations.
- 14.49 These policy and strategy documents, including the Clean Power 2030 Action Plan, Onshore Wind Taskforce Strategy and the NPS's for energy infrastructure EN-1 and EN-3, all acknowledge the critical national need for the increased deployment of onshore wind, particularly as it is one of the cheapest clean power options available. The Clean Power 2030 Action Plan pathways see a doubling of onshore wind capacity from 14.2GW in 2023 to between 27 – 29GW by 2030. Accounting for schemes already committed or under construction (4.4GW), current potential onshore wind capacity equates to 18.6GW and therefore there remains a need for 8.4GW of capacity to meet the 27GW target and 10.4GW to meet the 29GW target¹⁶⁵.
- 14.50 The Proposed Development will also support the UK Government's objectives, including those in the National Security Strategy 2025, around enhancing 'homegrown energy supply', contributing to a secure and reliable domestic energy generation system which underpins national security.
- 14.51 The Proposed Development represents one of the first onshore wind farm proposals to come forward in England since the removal of the de-facto ban. It will provide a capacity of at least 68.4MW of renewable electricity exported to the national grid, which will make an important contribution (approximately 0.8% as a minimum) to meeting the additional need (8.4GW) for capacity to achieve the Clean Power 2030 27GW target. It would also represent 18.24% of the GMCA 2038 target for renewable energy generation in Greater Manchester. This is underpinned by a secured grid connection offer for delivery by 2029, which materially distinguishes the Proposed Development from other speculative schemes and demonstrates that it is both viable and capable of contributing to national energy and climate objectives within the timeframe envisaged by the government's Clean Power by 2030 ambition. Deliverability is a key consideration in planning decisions for renewable infrastructure, and the secured 2029 grid connection enhances the weight to be attached to the scheme as a whole.

- 14.52 As set out in Section 10 of this PDAS, **substantial positive weight** should be afforded to VSC 1 and the benefits arising from renewable energy generation and the Proposed Development's consistency with national policy relating to renewable energy, in accordance with NPPF Policy W3.

VSC 2: Contribution to Addressing Climate Emergency Objectives.

- 14.53 As set out in Section 2 of this PDAS, the UK Government, as well as Rossendale and Rochdale, have all declared 'Climate Emergencies'.
- 14.54 The Climate Change Act 2008 (2050 Target Amendment) Order 2019 establishes a legally binding commitment for the UK to achieve a minimum 100% reduction in greenhouse gas emissions by 2050, relative to 1990 levels ("net zero"). This pathway includes an interim target of a 78% reduction by 2035.
- 14.55 Rossendale Council has pledged to work towards ensuring that the Council and the Borough is carbon neutral by 2030. Its Climate Change Strategy¹⁶⁶ places an emphasis on 'actively' moving to more renewable sources of energy generation and acknowledges that a key contribution to helping climate change is through:

"Both a reduction in the overall consumption of energy and the adoption of more renewable energy sources to fulfil our local demand".

- 14.56 Rochdale Council has pledged to work towards ensuring that the Council and the Borough is carbon neutral by 2038. Its Climate Change Strategy and Delivery Plan¹⁶⁷ confirms that one of the key features of a carbon neutral Borough will be for energy to be "generated locally and to meet local demand". This Strategy also identifies a target to increase the renewable energy generated in the Borough from 15GWh to 141GWh by 2030, and to create 1,838 new jobs in low carbon and renewable energy sectors in the Borough by 2038 and 2,643 by 2050.
- 14.57 Once the Proposed Development becomes operational it would deliver 102,326 tCO₂e of GHG emission savings annually through the generation and utilisation of renewable electricity compared to fossil fuel generation (i.e. GHG savings).
- 14.58 Based upon the predicted construction stage GHG emissions and the operational stage GHG savings maximum (i.e. worse case) pay-back period of 1.5 years is identified with the project delivering net GHG emission savings over the subsequent c.38.5 years of operation. It is identified that the Proposed Development would generate sufficient power to meet the requirements of 84,552 homes annually and will contribute to realisation of the UK's net zero objectives.
- 14.59 Further information relating to reductions in GHG emissions is set out within the *Sustainability, Energy and Climate Change Statement* prepared by Turley and submitted in support of the Application.
- 14.60 VSC 2 attracts **substantial positive weight** in its own right in the planning balance and determination of the application, in accordance with NPPF Policy W3.

¹⁶⁶ [Rossendale Borough Council - Climate Change Strategy 2020 - 2030](#)

¹⁶⁷ [Rochdale Borough Council - Climate Change Strategy and Delivery Plan](#)

VSC 3: Moorland Restoration & Management

- 14.61 VSC 3 comprises the need for, and the benefits which will be derived from, the proposed restoration of a significant area of severely degraded peat moorland.
- 14.62 A *Moorland Restoration and Management Plan* (MRMP) has been prepared by Atmos Consulting and is submitted with the Application. Its provisions are an integral part of the Proposed Development.
- 14.63 Whilst a summary of the key elements of the MRMP is presented in Section 7 of this PDAS, it is considered imperative that this should be read alongside the provisions of the MRMP in its entirety. The benefits arising from the MRMP are summarised below to provide the reader with an overview of this limb of the VSC case.
- 14.64 The key benefits of the MRMP include:
- Enhancement of the biodiversity of the blanket bog and acid grassland vegetation through removing bare ground/peat, increasing species richness and thus the opportunities for a wider range of animals.
 - Improvements to the water quality draining off the moors into the surrounding streams, with benefits to the water treatment works and to aquatic invertebrates in the stream. This would be of value to the operators of the reservoirs fed from much of the area surrounding the Site, as well as to the wider biodiversity of the streams, since dissolved organic carbon (DOC) / sediment can adversely affect the aquatic invertebrate diversity.
 - Improvement to the forage quality and productivity of the vegetation of the Site so that it could support more stock in the future in a more sustainable way.
 - Increased resilience of the vegetation to wildfire and facilitation of carbon sequestration, both through re-wetting the peat where possible.
 - Reduction in the loss of carbon through peat erosion, peat decay and DOC/sediment in the streams, thus contributing to climate change objectives.
 - Improvement in the appearance and amenity value of the Site for public enjoyment through having more plant species, more flowers and seeds, less bare eroding peat, and more wildlife to see, and
 - Improvements in water catchment characteristics through reduced flows.
 - Reducing runoff rates, thus minimising any contribution to downstream flooding.
- 14.65 Given the severely degraded condition of the peat moorland with the Site and the impact of this in terms of carbon loss, on the amenity value of the area and on water quality it is considered that the proposed implementation of the MRMP and the realisation of its benefits are entirely in accord with national and local planning policy and supportive of the Government's responsibilities to enhance the condition of priority habitats (of which blanket bog is one). It should, in our view, attract **substantial weight** as part of the VSC case in the overall planning balance, through its contribution

to remediating despoiled and degraded moorland in accordance with NPPF Policy L2(1)(a).

14.66 The Applicant proposes that the implementation and long-term delivery of the MRMP will be secured via Section 106 Agreement. The land required for delivery of the MRMP is entirely within the Applicants control, via legal agreements with relevant landowners and Common Land rights holders.

14.67 It is without question that the Proposed Development presents an important opportunity to restore a significant area of degraded peat moorland and, without its implementation, not only will the aforementioned benefits not be realised but the condition of the Site will continue to deteriorate for the foreseeable future with further environmental consequences for the flora and fauna of the Site and its visual and recreational amenity.

VSC 4: Biodiversity enhancements

14.68 As outlined in the accompanying *Biodiversity Net Gain Assessment*, and summarised in Section 13 of this PDAS, the Proposed Development will result in a biodiversity net gain for habitat units of 10.75% and for watercourse units of 10.62%, ensuring a positive impact on the local ecosystem.

14.69 The contribution to enhancement of biodiversity net gain attracts **moderate positive weight** in its own right in the planning balance.

VSC 5: Public access enhancements

14.70 As outlined in the accompanying *Outdoor Access Management & Enhancement Plan* (OAMEP), and summarised in Section 7 of this PDAS, the Proposed Development incorporates a range of enhancements to public access to the moor, including the opening up of 15.1km of access tracks for public use; the creation of a new permissive public footpath / bridleway connection; enhancements to mountain bike trails; facilitating moorland stewardship; contributing to tackling illegal off-roading; providing improved cycling links between Cragg and Lee Quarries; providing enhancements to Greenbooth Reservoir Car Park; and investing in interpretation and learning infrastructure (including the proposed Moor Cock Inn Rest Area on Rooley Moor Road, as well as a dedicated learning turbine, interpretation boards, directional signage and digital resources).

14.71 The contribution to enhancement of public access attracts **moderate positive weight** in its own right in the planning balance.

VSC 6: The socio-economic benefits arising from the Proposed Development

14.72 The Application is supported by a *Socio-Economic Benefits Statement*, prepared by Turley Economics, which sets out the wide-ranging socio-economic benefits that could be realised through both construction and operation of the Proposed Development – these benefits are summarised in Section 12 of this PDAS and for the sake of brevity are not replicated here.

14.73 The contribution made by a range of socio-economic benefits attracts **substantial positive weight** in its own right in the planning balance, as advised by NPPF Policies W3 and E2.

VSC 7: Temporary and reversible impacts

- 14.74 Full planning permission is being requested for the Proposed Development for a temporary period of 40 years. Upon completion of this period, the Proposed Development will be decommissioned. All electricity-generating equipment, structures, and associated infrastructure will be removed from the Site, with the exception of landscaping features – as summarised by the *Indicative Decommissioning Plan*.
- 14.75 A full Decommissioning & Restoration Strategy and a Decommissioning Environmental Management Plan (DEMP) for the wind farm and site restoration will be prepared and submitted to RBC / RMBC prior to such works commencing. This can be secured by planning condition.
- 14.76 In light of the above, it can be concluded that the effects of the Proposed Development would be temporary and fully reversible. This consideration holds some weight in favour of granting permission, although the positive weight is **limited**.

Conclusion

- 14.77 The assessment of the Green Belt balance as to whether the benefits identified amount to the very special circumstances necessary to outweigh the identified harm to the Green Belt and other harm is presented in Section 15 of this PDAS. In consideration of the above, it can be concluded that the Proposed Development would cause definitional harm to the Green Belt and substantial harm to its openness. There would also be harm to 2no. purposes of the Green Belt. Collectively, the harm to the Green Belt attracts substantial weight.
- 14.78 In terms of 'other harm' this would be restricted to significant harm to some aspects of landscape character and visual amenity. The harm to landscape character attracts significant weight, with harm to visual amenity attracting moderate weight. A limited degree of harm to ecology, ornithology, shadow cast and, watercourses / bodies also arises. This harm attracts no more than limited weight with the exception of:
- The identified heritage harm to which substantial weight should be given (in accordance with NPPF Policy HE6).
 - The identified harm to landscape character to which substantial weight should be given (in accordance with NPPF Policy NE4).
 - The identified harm to visual amenity to which moderate weight should be given.
- 14.79 Set against this temporary and reversible harm are range of substantial benefits which directly respond to national policy objectives relating to matters such as national energy security, reducing GHG emissions, restoring peatlands, delivering biodiversity net gain, supporting economic growth (including through access to education, training and employment) and improving access to and the beneficial use of land within the Green Belt to the assistance of health and wellbeing. These benefits are both substantial and compelling. They attract substantial/moderate weight as set out above. Collectively they comprise the very special circumstances necessary to justify development within the Green Belt.

Development Outside the Settlement Boundary

- 14.80 The residual element of the Site which is not located within the Green Belt, is regardless located outside a defined settlement boundary.
- 14.81 Rossendale LP Strategic Policy SD2 (Urban Boundary and Green Belt) confirms that all new development in the Borough will take place within the Urban Boundaries, defined on the Policies Map, except where development specifically needs to be located within a countryside location and the development enhances the rural character of the area.
- 14.82 The Applicant acknowledges that the Proposed Development is in conflict with Policy SD2, in so far as the components of the Proposed Development which are located on land outside of the defined Urban Boundary (as per the Policy Map) but which are also not within the Green Belt, and which don't enhance the rural character of the area. However, as is considered in Section 6 of this PDAS, the Site has been selected due to a range of factors making it suitable for commercial scale onshore wind development – these factors mean that a countryside location is most appropriate for the Proposed Development. It is inconceivable that the national objectives relating to onshore wind generation and the use of commercial scale wind turbines can be achieved without the use of sites within the countryside. On this basis, the weight to be applied to this policy conflict is **neutral**.
- 14.83 NPPF Policy S5(1)(a) advises that 'energy infrastructure' (such as the Proposed Development) is one of the forms of development which should be approved on land situated outside settlement boundaries, unless the benefits of doing so would be **substantially outweighed** by any adverse effects, when assessed against the national decision-making policies in the NPPF.
- 14.84 In undertaking an assessment of the Proposed Development, it is important to remain mindful that substantial weight should be given to scheme benefits.
- 14.85 As is demonstrated in Sections 13 and 14 of this PDAS, the residual adverse effects of the Proposed Development would be temporary, reversible, localised and not significant. The existence of some residual effects is inevitable and to be expected from a scheme of this nature (as recognised in NPS EN-1). The nature of the residual effects is that they do not substantially outweigh (or even just outweigh) the benefits of the Proposed Development (which attract substantial/moderate positive weight). The Proposed Development is required to be located in a countryside/rural location, as set out in Section 6 of this PDAS.
- 14.86 Accordingly, the Proposed Development can be considered to be compliant with NPPF Policy S5 and this policy compliance should be afforded **substantial weight** in the decision-making process.

15. Planning Balance & Conclusions

- 15.1 As noted in Section 9 of this PDAS, applications for planning permission should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 15.2 The Proposed Development has been appraised against the Development Plan and other material considerations in Sections 10-14. The following section brings this appraisal together and sets out the case for the grant of planning permission, first undertaking a Green Belt balancing exercise, balancing the identified harms against the benefits of the Proposed Development to identify whether very special circumstances exist to justify inappropriate development in the Green Belt ('the Green Belt balance'). It then sets out an evaluation under Section 38(6) of the Planning and Compulsory Purchase Act 2004 to confirm the compliance with the adopted Development Plans and other material considerations.
- 15.3 In undertaking the balancing exercise, it is necessary to identify the weight which is to be attached to the various impacts and benefits. In doing so a weighting system which ranges from 'substantial' – 'neutral' is utilised with 'substantial' representing the greatest level of weight to be attached and 'neutral' representing no weight. The use of the term 'substantial weight' reflects the language utilised within the NPPF, particularly in respect to the weight to be attributed to the benefits associated with proposals for renewable energy generation (NPPF Policy W3), as well as the identified harm to the Green Belt.

Green Belt Balance

Identified Harm

- 15.4 Some elements of the Proposed Development comprise inappropriate development within the Green Belt¹⁶⁸.
- 15.5 Having identified the relevant policies in the Development Plan, alongside other material considerations, including the NPPF, the decision-maker must assess whether VSC exist to justify granting planning permission for those elements of the Proposed Development (and the development when considered as a whole). This involves evaluating the weight to be given to each issue to determine the overall balance, in accordance with NPPF Policy GB6 and Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 15.6 The Proposed Development would lead to definitional harm to the Green Belt, substantial harm to the openness of the Green Belt and harm to two Green Belt purposes¹⁶⁹. The identified harms should be given **substantial weight** in the decision-making process, in accordance with NPPF Policy GB6.

¹⁶⁸ Eight wind turbines and associated hard standings

¹⁶⁹ This includes limited – moderate harm to the purpose (c) safeguarding the countryside from encroachment and very limited harm to purpose (d) preserving the setting and special character of historic towns.

15.7 There would be 'other harm' arising from the Proposed Development, including:

- Adverse residual effects to landscape character, visual amenity and residential visual amenity. These include significant adverse effects to landscape character and visual amenity in some instances and effects which are not considered to be significant in others. However, the special qualities of Protected Landscapes (The Peak District National Park and the Forest of Bowland National Landscape) would be preserved, in accordance with NPPF Policy N4(4). No residential property would widely be regarded as an unpleasant or unattractive place in which to live. Accordingly, the identified harm to landscape character is afforded **substantial weight**. The harm to visual amenity attracts **moderate weight**.
- Varied levels of harm to the significance of designated and non-designated heritage assets, which in all cases is below the bar of 'substantial harm'. In accordance with NPPF Policy HE6, the harm to designated heritage assets is afforded **substantial weight**. The low level of harm to non-designated heritage assets is afforded **limited weight**, in accordance with NPPF Policy HE7.
- Negligible to Major adverse residual adverse effects to potential / unknown buried archaeological remains (prehistoric artefacts and features) as a result of loss / disturbance – this effect is potentially significant (dependant on the nature of any encountered remains and the mitigation strategy employed). The identified harm is afforded **limited – moderate weight**, in accordance with NPPF Policy HE7.
- Negligible to Minor residual adverse effects to other individual archaeological receptors, including negligible adverse residual harm to Rooley Moor Road non-designated heritage asset during the construction of the Proposed Development – the identified harm is afforded **limited weight**, in accordance with NPPF Policy HE7.
- Negligible to Minor residual adverse effects to individual ecological receptors – the identified harm is afforded **very limited weight**. Overall, the scheme will deliver more than 10% net gain in biodiversity across the Site.
- Negligible to Minor residual adverse effects to ornithology – the identified harm is afforded **very limited weight**.
- Minor residual harm to waterbodies / watercourses – the identified harm is afforded **very limited weight**
- The potential for intermittent effects from shadow cast on horses and riders dependent on various factors including prevailing weather conditions and time of day – the identified harm is afforded **very limited weight**.

15.8 The identified harm to the Green Belt, together with other identified harm, is to be given **substantial weight** in the overall balance.

Benefits of the Proposed Scheme

15.9 For VSC to be established, the total harm identified must be clearly outweighed by the benefits and material considerations supporting the Proposed Development. The weight to be given to each of the VSC's (identified in Section 14 of this PDAS) in the planning balance is as follows:

- VSC1: Substantial contribution to meeting a national, regional and local need for renewable energy generation from onshore wind – **substantial weight** (in accordance with NPPF Policy W3).
- VSC 2: Substantial contribution to Addressing Climate Emergency Objectives – **substantial weight** (in accordance with NPPF Policy W3).
- VSC 3: Moorland Restoration & Management – **substantial weight** (in accordance with NPPF Policy L2(1)(a)).
- VSC 4: Biodiversity net-gain enhancements in excess of statutory requirements – **moderate weight**.
- VSC 5: Public Access Enhancements – **limited – moderate weight**.
- VSC 6: Significant socio-economic benefits arising from the Proposed Development – **substantial weight** (in accordance with NPPF Policy E2).
- VSC 7: Temporary and reversible impacts – **limited weight**.

Balance of benefits and harms – Very Special Circumstances

15.10 As outlined above, many of the benefits arising from the Proposed Development are substantial and carry substantial/moderate positive weight in their own right. Taken together, the overall package of benefits is wide ranging, addressing environmental, social and economic policy objectives of the highest order. The urgent need to reduce GHG emissions to prevent the devastating effects of climate change is a global priority. In response, UK planning / energy policy calls for the mass deployment of onshore wind turbines (along with other technologies) to meet that need. Doing so will inevitably lead to impacts such as those to landscape character, visual amenity and the Green Belt. The effects which have been recorded for the Proposed Development has been minimised in so far as possible mindful of wider objectives, are of localised significance, and are neither unusual nor out of the ordinary. The effects are temporary and reversible and are significantly outweighed by the benefits which stand to be realised such that **Very Special Circumstances exist**. In consideration of the above the Proposed Development is compliant with the policy tests set out in the NPPF, as well as / the following Development Plan policies:

- Rossendale: Rossendale LP Strategic Policy SD2
- Rochdale: PFE Policy JP-G9.

15.11 Adding further weight in support of the Proposed Development, the proposals also contribute to the beneficial use of the Green Belt in accordance with NPPF Policy GB5, as well as providing compensatory measures to improve the environmental quality and

accessibility of remaining Green Belt land in accordance with the following Development Plan policies:

- Rossendale: Rossendale LP Strategic Policy SD2
- Rochdale: PFE Policies JP-G9 and JP-G2.

Compliance with the Development Plan

15.12 The assessment presented in this PDAS, including the detailed policy-by-policy appraisal of consistency presented at Sections 10-14, demonstrates that the Proposed Development is compliant with the Development Plan in almost every respect, including and most significantly in respect of the key policies relating to onshore wind development (Rossendale LP Policy ENV7 (in part) and Rochdale CS Policy G3).

15.13 The limited exceptions are:

- Rossendale:
 - Rossendale LP Strategic Policy SD2 (Urban Boundary and Green Belt), in so far as the components of the Proposed Development which are located on land outside of the defined Urban Boundary (as per the Policy Map) but which are also not within the Green Belt, and which don't enhance the rural character of the area. However, as is considered in Section 3 of this PDAS, the Site has been selected due to a range of factors making it suitable for commercial scale onshore wind development – these factors mean that a countryside location is most appropriate for the Proposed Development. It is inconceivable that the national objectives relating to onshore wind generation and the use of commercial scale wind turbines can be achieved without the use of sites within the countryside. On this basis, the weight to be applied to this policy conflict is **neutral**.
- Rochdale:
 - Rochdale CS Policy DM1 (General Development Management Requirements) - in respect of the adverse impact on *affect amenity of residents or users through visual intrusion*. It is to be noted however that the policy is a general development management policy and that the conflict arises because the policy sets a very high bar of acceptability by seeking to avoid **any** adverse effects. This is in contrast to Policy G3 which is specific to low carbon energy proposals and which requires that adverse effects be minimised and mitigated and with which compliance is achieved. In consideration of the above and the temporary and reversible nature of the effects this policy conflict attracts **neutral weight**.

15.14 This limited degree of conflict sits against a very significant degree of consistency and explicit policy support for the Proposed Development.

- 15.15 It should be concluded therefore, that the Proposed Development accords with the Development Plan when read as a whole. In line with planning law¹⁷⁰, planning applications should be determined in accordance with the adopted Development Plan, unless material considerations indicate otherwise.

Other Material Considerations

- 15.16 A number of other material considerations have been identified in Sections 10-14 which further weigh in favour of the Proposed Development, supporting the identified compliance with the Development Plan.
- 15.17 The Proposed Development accords with the provisions of the NPPF in almost every respect, including, based on these conclusions, the presumption in favour of sustainable development. This is to be afforded **substantial positive weight**.
- 15.18 **Substantial positive weight** should be applied to the Proposed Development's accordance with a range of national, regional and local policies relating to climate change and net zero energy infrastructure (as set out in Sections 2 and 10 of this PDAS). The Proposed Development is entirely aligned with and supportive of the UK's statutory obligation, as expressed within the Climate Change Act 2008 to be 'net zero' by 2050 and the aspiration of both Council's to be net-zero by 2030 (RBC) and 2038 (RMBC) respectively. The UK Government has identified the need for increased renewable capacity, including the 'mass deployment' of onshore wind, to meet legally binding climate goals and national security objectives. Targets for onshore wind deployment have been set for 2030 through the Clean Power 2030 Action Plan, with a series of actions identified to stimulate increased deployment through the Onshore Wind Taskforce Strategy and the National Security Strategy 2025 confirming the vital role of domestic energy security in safeguarding the UK against external threats. However, there are only a finite number of viable onshore wind sites that are environmentally acceptable, commercially feasible, and capable of securing a grid connection in time. Scout Moor II is one of those rare projects — it has grid rights in place and is technically and financially deliverable within the Government's 2030 timeframe. To realise this ambition, the planning system must not become a barrier. Timely consent is critical to ensuring projects like this can proceed to construction and help meet national targets. Delay at this stage risks missing the window for delivery, undermining both national and local policy goals.
- 15.19 **Substantial positive weight** should also be applied to the Proposed Developments' consistency with the Overarching National Policy Statement on Energy Infrastructure (NPS EN-1) (December 2025), in accordance with paragraph 1.2.1 of NPS EN-1, as this represents an up-to-date expression of Government's planning policy in relation to proposals for energy infrastructure.
- 15.20 NPS EN-1 confirms that there is an *"urgent need for significant amounts of large-scale energy infrastructure in meeting government's energy objectives"*¹⁷¹ and that onshore wind is one of the lowest cost ways of generating electricity, *"helping reduce costs and*

¹⁷⁰ Section 38(6) of the Planning and Compulsory Purchase Act 2004

¹⁷¹ NPS EN-1 (Paragraph 1.1.1)

*providing a clean and secure source of electricity supply*¹⁷². NPS EN-1 also confirms that there is a critical national priority (CNP) for the provision of nationally significant low carbon energy infrastructure and that the urgent need for such infrastructure to achieving energy objectives, together with national security, economic, commercial and net zero benefits, will in general outweigh any other residual impact not capable of being addressed by application of the mitigation hierarchy.

- 15.21 Whilst the Proposed Development does not comprise a Nationally Significant Infrastructure Project (as defined by the PA2008) and does not comprise Critical National Priority Infrastructure (with reference to NPS EN-1) it is, nonetheless, a project of national significance which will deliver infrastructure which is critical to national energy security, reducing GHG emissions and economic growth, amongst other things. This attracts **substantial positive weight** in the planning balance.

Overall Planning Balance and Conclusions

- 15.22 The Proposed Development accords with the Development Plan when read as a whole.
- 15.23 In addition, the Proposed Development is supportive of the strategic objectives set out within a range of material considerations, including the NPPF (and its presumption in favour of sustainable development), NPS EN-1, NPS EN-3 and a range of other national, regional and local policies relating to climate change and net zero energy infrastructure (as set out in Section 9). Collectively these other material considerations weigh significantly in favour of the proposals.
- 15.24 The Proposed Development is of significant scale and, by implication the environmental, social and economic benefits which stand to be realised from its construction and operation will be substantial and enduring.
- 15.25 It is acknowledged that, notwithstanding a sensitive approach to design, there will be some residual harm to some receptors. However, that harm has been minimised and mitigated in so far as possible mindful of the need to optimise energy generation given the available wind resource and grid connection capacity. Only in the case of effects to landscape character and visual amenity have significant effects been identified, which may be perceived as being adverse. That the Proposed Development gives rise to such is neither unusual nor out of the ordinary. It is inconceivable that the scale of energy generation aspired to within suite of policy documents and the scale of need identified within CP30 can be met without the deployment of commercial wind turbines of the scale proposed and in doing so significant effects to landscape character and visual amenity are inevitable and unavoidable as is explicitly recognised within NPS EN-3.
- 15.26 The identified effects of the Proposed Development would be temporary and entirely reversible upon decommissioning. The occurrence of such is preferable to the devastating, long term and irreversible effects of climate change that will continue to be experienced unless the emission of GHG is abated.

¹⁷² NPS EN-1 (Paragraphs 3.3.23 – 3.3.25)

- 15.27 In consideration of the above it is concluded that substantial and enduring benefits of the Proposed Development would clearly outweigh the temporary and reversible adverse effects identified.
- 15.28 Accordingly, in applying Section 38(6) of the Planning and Compulsory Purchase Act 2004 and NPPF Policies S3 and S5, as well as Rossendale LP Strategic Policy SD1 (Presumption in favour of sustainable development) and Rochdale CS Policy SD1 (Delivering Sustainable Development), planning permission should be granted, without delay.
- 15.29 The Proposed Development is one of the first, if not the first, large-scale onshore wind energy project to seek planning permission since the Labour Government took office in June 2024. Its approval has the potential to catalyse further investment in renewable energy technology and sites in the UK, to drive further progress towards net zero and to enhance national energy security.

Appendix 1: Schedule of Relevant Development Plan Policy and Other Material Considerations

The following table presents a thematic schedule of the key development management related policies of the adopted Development Plan for each Council and the associated other material considerations of relevance. The strategic and site-specific policies of the Development Plans and other material considerations of relevance are set out in the main body of this PDAS and are therefore not repeated here.

Technical Discipline	Development Plan		Supplementary Planning Documents / Guidance		Other Material Considerations
	Rossendale	Rochdale	Rossendale	Rochdale	
Access & Transport	- Rossendale LP Strategic Policy TR1 (Strategic Transport) - Rossendale LP Policy TR3 (Road Schemes and Development Access) - Rossendale LP Policy TR4 (Parking) - Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough) - Rossendale LP Policy LT3 (Tourism) - Rossendale LP Policy ENV7 (Wind Turbines) - Rossendale LP Policy SD3 (Planning Obligations)	- PfE Policy JP-Strat6 (Northern Areas) - PfE Policy JP-Strat14 (A Sustainable and Integrated Transport Network) - PfE Policy JP-C1 (An Integrated Network) - PfE Policy JP-C3 (Public Transport) - PfE Policy JP-C4 (The Strategic Road Network) - PfE Policy JP-C5 (Streets for All) - PfE Policy JP-C6 (Walking and Cycling) - PfE Policy JP-C7 (Freight and Logistics)	Climate Change SPD (Chapter 3)	N/A	- NPPF Policies TR3, TR4 & TR6 - Rochdale Borough Draft Local Plan Draft Policies T1, T4, S3 & DM1 - Travel Plans, Transport Assessments and Statements PPG - Renewable & Low Carbon Energy PPG, Paragraph 016

		• PfE Policy JP-C8 (Transport Requirements of New Development) • Rochdale CS Policy T1 (Delivering Sustainable Transport) • Rochdale CS Policy T2 (Improving Accessibility) • Rochdale CS Policy SP1 (Rochdale Borough's Role in the City Region) • Rochdale CS Policy DM1 (General Development Management Requirements) • Rochdale CS Policy DM2 (Delivering Planning Contributions & Infrastructure) • Saved Rochdale UDP Policy A/24 (Strategic Highway Network)				
Public Rights of Way, Footpaths & Cycleways	• Rossendale LP Policy TR2 (Footpaths, Cycleways and Bridleway) • Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough) • Rossendale LP Policy ENV7 (Wind Turbines)	• PfE Policy JP-Strat6 (Northern Areas) • PfE Policy JP-Strat14 (A Sustainable and Integrated Transport Network) • PfE Policy JP-C1 (An Integrated Network) • PfE Policy JP-C6 (Walking and Cycling)	• Climate Change SPD (Chapter 3)	• N/A	• NPPF Policies TR8, DP3, HC7 and GB5 • Rochdale Borough Draft Local Plan Draft Policy S3 • Open space, sports and recreation facilities, public	

	- Rossendale LP Policy LT3 (Tourism) - Rossendale LP Policy SD3 (Planning Obligations) - Rossendale LP Policy SD4 (Green Belt Compensatory Measures)	- PfE Policy JP-C8 (Transport Requirements of New Development) - PfE Policy JP-P7 (Sport & Recreation) [in so far as it relates to Public Rights of Way) - Rochdale CS Policy T1 (Delivering Sustainable Transport) - Rochdale CS Policy T2 (Improving Accessibility) - Rochdale CS Policy SP1 (Rochdale Borough's Role in the City Region) - Rochdale CS Policy DM1 (General Development Management Requirements) - Rochdale CS Policy DM2 (Delivering Planning Contributions & Infrastructure) - Saved Rochdale UDP Policy RE/6 (Recreational Rights of Way) - Saved Rochdale UDP Policy RE/7 (Recreational Management Areas)			rights of way and local green space PPG
Design, Landscaping & Public Realm	Rossendale LP Strategic Policy ENV1 (High Quality	PfE Policy JP-P1 (Sustainable Places)	N/A	Design & Planning Progress: A Guide to Good Practice	NPPF Policies DP3 & DP4

	- Development in the Borough) - Rossendale LP Strategic Policy ENV3 (Landscape Character and Quality) - Rossendale LP Policy ENV4 (Biodiversity, Geodiversity and Ecological Networks) - Rossendale LP Policy ENV5 (Green Infrastructure Networks) - Rossendale LP Policy ENV7 (Wind Turbines)	- PfE Policy JP-G5 (Urban Green Space) - PfE Policy JP-C5 (Streets for All) - Rochdale CS Policy P1 (Improving Image) - Rochdale CS Policy P2 (Protecting and Enhancing Character, Landscape and Heritage) - Rochdale CS Policy P3 (Improving Design of New Development) - Rochdale CS Policy DM1 (General Development Management Requirements) - Rochdale CS Policy DM2 (Delivering Planning Contributions & Infrastructure)		- Urban Design SPD - Public Realm Design Guide SPD	- Rochdale Borough Draft Local Plan Draft Policies PE1, S3 & DM1 - Design: Process & Tools PPG - Renewable & Low Carbon Energy PPG
Landscape Character & Visual Impact	- Rossendale LP Strategic Policy ENV3 (Landscape Character and Quality) - Rossendale LP Strategic Policy ENV2 (Historic Environment) - Rossendale LP Policy ENV7 (Wind Turbines) - Rossendale LP Policy LT3 (Tourism)	- PfE Policy JP-G1 (Landscape Character) - Rochdale CS Policy P2 (Protecting and enhancing character, landscape and heritage) - Rochdale CS Policy DM1 (General Development Management Requirements)	N/A	N/A	- NPPF Policy N2 & N4 - Rochdale Borough Draft Local Plan Draft Policies G8, S3 & PE4 - Renewable & Low Carbon Energy PPG, Paragraphs 022-023

					• Natural Environment PPG (Paragraphs 036-043) • NPS EN-1 (Sections 4.7 and 5.10) • NPS EN-3 (Section 2.212) • Landscape Capacity Study for Wind Energy Developments in the South Pennines
Green Belt	• Rossendale LP Strategic Policy SD2 (Urban Boundary and Green Belt) • Rossendale LP Policy SD4 (Green Belt Compensatory Measures)	• PfE Policy JP-G9 (The Green Belt)¹ • PfE Policy JP-G2 (Green Infrastructure Network)	• Compensatory Measures for Green Belt Release Guidance	• N/A	• NPPF Policies GB6 & GB7 • Green Belt PPG • NPS EN-1
Built Heritage	• Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough)	• PfE Policy JP-P2 (Heritage) • PfE Policy JP-G1 (Landscape Character) • Rochdale CS Policy P2 (Protecting and enhancing	• N/A	• N/A	• NPPF Policies HE4, HE5, HE6, HE7 & HE9 • Rochdale Borough Draft Local Plan Draft Policy PE5

¹ PfE Appendix A confirms that Rochdale CS Policy G4 (Protecting Green Belt land) is wholly superseded by PfE Policy JP-G9 (The Green Belt).

	- Rossendale LP Strategic Policy ENV2 (Historic Environment) - Rossendale LP Policy ENV7 (Wind Turbines)	- character, landscape and heritage) - Saved Rochdale UDP Policy BE/17 (New Development Affecting Conservation Areas)			- Historic Environment PPG - Renewable & Low Carbon Energy PPG, Paragraph 019 - Historic England Advice Note 15 (Second Edition) – Delivering Clean Power: Commercial Renewable Energy Development and the Historic Environment
Archaeology	Rossendale LP Strategic Policy ENV2 (Historic Environment)	- PfE Policy JP-P2 (Heritage) - PfE Policy JP-G1 (Landscape Character) - Rochdale CS Policy P2 (Protecting and enhancing character, landscape and heritage)	N/A	N/A	- NPPF Policies HE5, HE7 & HE10 - Rochdale Borough Draft Local Plan Draft Policy PE5 - Historic England Advice Note 15 (Second Edition) – Delivering Clean Power: Commercial Renewable Energy Development and

					the Historic Environment
Flood Risk & Drainage	- Rossendale LP Policy ENV9 (Surface Water Run-off, Flood Risk, Sustainable Drainage and Water Quality) - Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough)	- PfE Policy JP-S4 (Flood Risk and the Water Environment) - Rochdale CS Policy G6 (Enhancing Green Infrastructure) - Rochdale CS Policy G8 (Managing Water Resources and Flood Risk) - Rochdale CS Policy DM1 (General Development Management Requirements) - Rochdale CS Policy DM2 (Delivering Planning Contributions & Infrastructure) - Saved Rochdale UDP Policy EM/7 (Development and Flood Risk)	Climate Change SPD (Chapter 5)	N/A	- NPPF Policies F4-F8 - Rochdale Borough Draft Local Plan Draft Policy S3 & S4 - Flood Risk & Coastal Change PPG
Hydrology & Water Quality	- Rossendale LP Policy ENV6 (Environmental Protection) - Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough)	- Rochdale CS Policy G8 (Managing Water Resources and Flood Risk) - Rochdale CS Policy G9 (Reducing the Impact of Pollution, Contamination and Land Instability) - Saved Rochdale UDP Policy EM/8 (Protection of Surface and Ground Water)	Climate Change SPD (Chapter 5)	N/A	- NPPF Policies P3 & F8 - Rochdale Borough Draft Local Plan Draft Policy S3 & S4 - Water Supply, wastewater and water quality PPG

Biodiversity & Ecology	- Rossendale LP Policy ENV4 (Biodiversity, Geodiversity and Ecological Networks) - Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough) - Rossendale LP Policy ENV7 (Wind Turbines) - Rossendale LP Policy LT3 (Tourism)	- PfE Policy JP-G8 (A Net Enhancement of Biodiversity and Geodiversity) - Rochdale CS Policy G7 (Increasing the value of biodiversity and geodiversity) - Rochdale CS Policy G8 (Managing Water Resources and Flood Risk) - Rochdale CS Policy DM1 (General Development Management Requirements) - Rochdale CS Policy DM2 (Delivering Planning Contributions & Infrastructure) - Saved Rochdale UDP Policy NE/2 (Designated Sites of Ecological and Geological / Geomorphological Importance)	- Climate Change SPD (Chapter 6) - South Pennine Moors Special Area of Conservation (SAC) / Special Protection Areas (SPAs) Joint SPD	- Biodiversity and Development SPD - Holcroft Moss Planning Obligations Joint SPD	- NPPF Policies N2, N3 & N6 - Rochdale Borough Draft Local Plan Draft Policies S3, G1, G7 & DM1 - Biodiversity Net Gain PPG - Natural Environment PPG - Renewable & Low Carbon Energy PPG, Paragraph 018 - NPS EN-1 Paragraph 5.4.2 - NPS EN-3 Paragraphs 2.12.51 – 2.12.57, 2.12.67 – 2.12.73, 2.12.113 – 2.12.117 and 2.12.147 – 2.12.151 - Lancashire Local Nature Recovery Strategy 2026 - Greater Manchester Local
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						Nature Recovery Strategy 2025
Peatland	Rossendale LP Policy ENV7 (Wind Turbines)	- PfE Policy JP-S2 (Carbon and Energy) - PfE Policy JP-G5 (Uplands) - Rochdale CS Policy G3 (Renewable and Low Carbon Energy Developments) - Rochdale CS Policy G7 (Increasing the Value of Biodiversity and Geodiversity)	Climate Change SPD (Chapter 6)	Biodiversity and Development SPD	- NPPF Policies CC2(f), N2 and N6 - Rochdale Borough Draft Local Plan Draft Policy G7 - UK Peatland Strategy and IUCN UK Peatland Programme guidance² - NatureScot Peatland Guidance³ - Forestry Commission, Forest Research, and Natural England Guidance⁴ - Environment Agency Guidance⁵	

² IUCN UK Peatland Programme (2018). UK Peatland Strategy 2018–2040. Available at: <https://www.iucn-uk-peatlandprogramme.org/resources/uk-peatland-strategy-2018-2040>

IUCN UK Peatland Programme. Peatland Restoration. Available at: <https://www.iucn-uk-peatlandprogramme.org/peatland-restoration>

³ NatureScot (2023). Advising on peatland, carbon-rich soils and priority peatland habitats in development management. Available at: <https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management>

⁴ Forestry Commission, Forest Research, and Natural England (2021). *Decision Support Framework for Peatland Protection and the Establishment of Woodland*. Available at: <https://www.gov.uk/government/publications/decision-support-framework-for-peatland-protection-the-establishment-of-new-woodland-and-re-establishment-of-existing-woodland-on-peatland-in-england>

⁵ Environment Agency (2004). *Guidance on the Management of Peat Soils and the Use of Peat in Construction*. Science Report SC030136.

					• England Peat Action Plan⁶ • Lancashire Local Nature Recovery Strategy 2026 • Greater Manchester Local Nature Recovery Strategy 2025
Green Infrastructure	• Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough) • Rossendale LP Policy ENV3 (Landscape Character and Quality) • Rossendale LP Policy ENV5 (Green Infrastructure Networks) • Rossendale LP Policy ENV9 (Surface Water Run-off, Flood Risk, Sustainable Drainage and Water Quality) • Rossendale LP Policy ENV10 (Trees and Hedgerows) • Rossendale LP Policy SD3 (Planning Obligations)	• PfE Policy JP-Strat13 (Strategic Green Infrastructure) • PfE Policy JP-G2 (Green Infrastructure Network) • PfE Policy JP-C6 (Walking and Cycling) • PfE Policy JP-G3 (River Valleys and Waterways) • Rochdale CS Policy G6 (Enhancing Green Infrastructure) • Rochdale CS Policy DM2 (Delivering Planning Contributions & Infrastructure)	• Climate Change SPD (Chapter 6)	• N/A	• NPPF Policies DP3 & N2 • Rochdale Borough Draft Local Plan Draft Policy G7 • Natural Environment PPG • Lancashire Local Nature Recovery Strategy 2026 • Greater Manchester Local Nature Recovery Strategy 2025

⁶ DEFRA (2021). *England Peat Action Plan*. Available at: <https://www.gov.uk/government/publications/england-peat-action-plan>

Health & Wellbeing	Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough)	- PfE Policy JP-P6 (Health) - Rochdale CS Policy C6 (Improving Health and Wellbeing) - Rochdale CS Policy DM1 (General Development Management Requirements) - Rochdale CS Policy DM2 (Delivering Planning Contributions & Infrastructure)	N/A	N/A	- NPPF Policies DP3 & P3 - Rochdale Borough Draft Local Plan Draft Policies PE2 & PE3 - Healthy & Safe Communities PPG
Noise & Vibration	- Rossendale LP Policy ENV6 (Environmental Protection) - Rossendale LP Policy ENV7 (Wind Turbines)	- Rochdale CS Policy G9 (Reducing the Impact of Pollution, Contamination and Land Instability) - Rochdale CS Policy DM1 (General Development Management Requirements) - Rochdale CS Policy DM2 (Delivering Planning Contributions & Infrastructure)	N/A	N/A	- NPPF Policy P3 - Rochdale Borough Draft Local Plan Draft Policies S3, S5 & DM1 - Noise PPG - Renewable & Low Carbon Energy PPG, Paragraph 015 - Assessment & Rating of Wind Turbine Noise (June 2026)
Air Quality	Rossendale LP Policy ENV6 (Environmental Protection)	- PfE Policy JP-S5 (Clean Air) - PfE Policy JP-C5 (Streets for All) - Rochdale CS Policy G9 (Reducing the Impact of	N/A	N/A	- NPPF Policy P3 - Rochdale Borough Draft Local Plan Draft Policies S3, S5 & DM1

		- Pollution, Contamination and Land Instability) - Rochdale CS Policy DM1 (General Development Management Requirements) - Rochdale CS Policy DM2 (Delivering Planning Contributions & Infrastructure)			Air Quality PPG
Ground Conditions, Contamination & Land Stability	- Rossendale LP Policy ENV6 (Environmental Protection) - Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough)	- Rochdale CS Policy G9 (Reducing the Impact of Pollution, Contamination and Land Instability) - Rochdale CS Policy DM1 (General Development Management Requirements)	N/A	N/A	- NPPF Policy P2 - Rochdale Borough Draft Local Plan Draft Policies S5 and DM1 - Land affected by contamination PPG - Land Stability PPG
Minerals	- Lancashire Minerals & Waste CS Policy CS1 (Safeguarding Lancashire's Mineral Resources) - Lancashire Minerals & Waste CS Policy CS2 (Minimising the need for Mineral Extraction) - Lancashire Minerals & Waste CS Policy CS3 (Meeting the demand for new minerals)	- GMJMP Policy 8 (Prior Extraction of Mineral Resources) - Rochdale CS Policy G10 (Managing mineral resources)	N/A	N/A	- NPPF Policies M5 & M6 - Minerals PPG

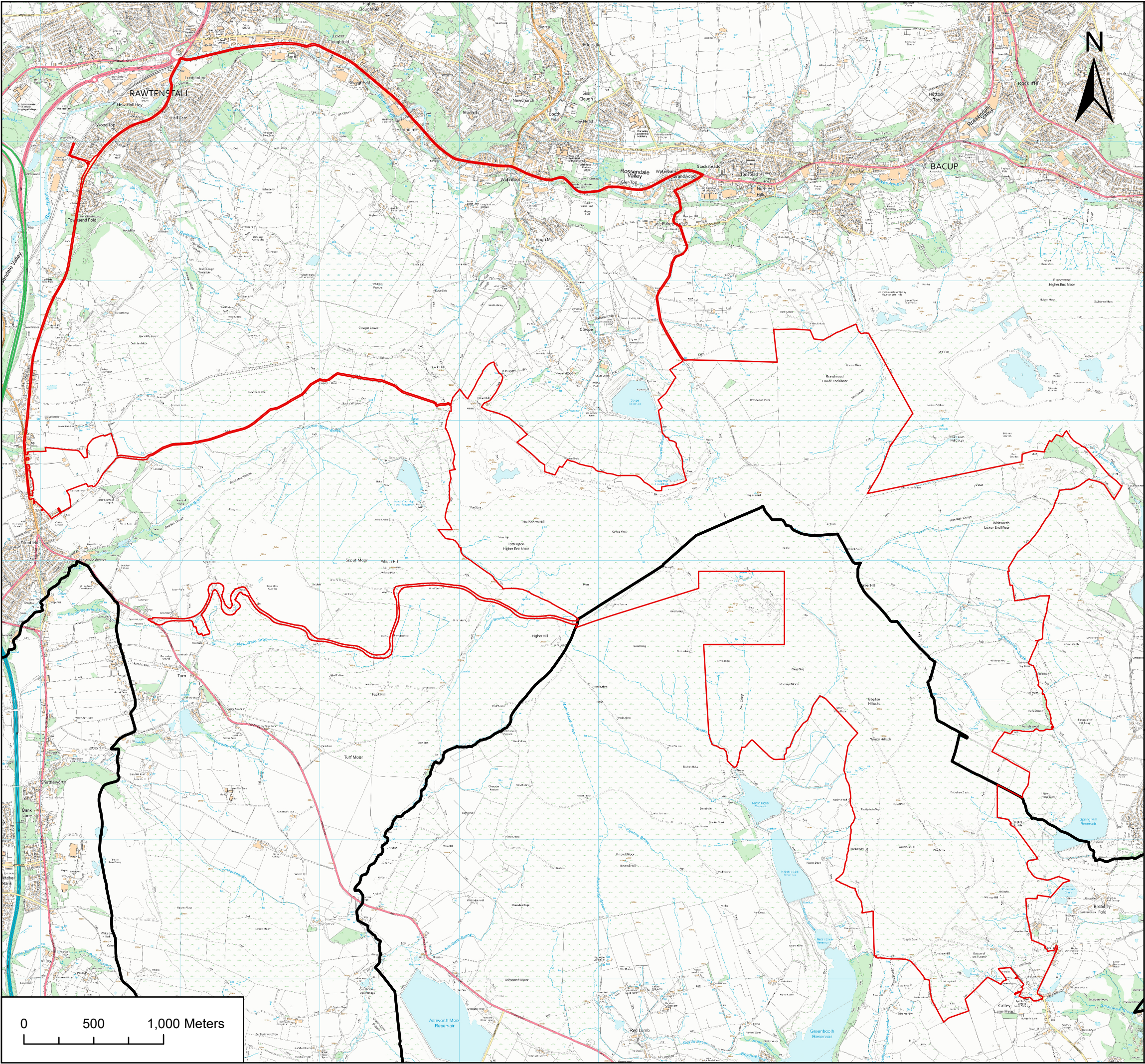
	• Lancashire Minerals & Waste CS Part 2 – Section 1 (Inert Waste Recycling – IWR1 Scout Moor) • Lancashire Minerals & Waste SADMP Policy DM1 (Management of Waste and Extraction of Minerals) • Lancashire Minerals & Waste SADMP Policy M2 (Safeguarding Minerals)				
Aviation Safeguarding	• Rossendale LP Policy ENV7 (Wind Turbines)	• PfE Policy JP-S2 (Carbon and Energy)	• N/A	• N/A	• NPPF Policies P4-P6 • Rochdale Borough Draft Local Plan Draft Policy S3 • Renewable & Low Carbon Energy PPG, Paragraph 016
Lighting	• Rossendale LP Policy ENV6 (Environmental Protection) • Rossendale LP Policy ENV7 (Wind Turbines)	• Rochdale CS Policy G9 (Reducing the Impact of Pollution, Contamination and Land Instability) • Rochdale CS Policy DM1 (General Development Management Requirements)	• N/A	• N/A	• NPPF Policy P3 • Rochdale Borough Draft Local Plan Draft Policy S5 • Light Pollution PPG • Renewable & Low Carbon Energy

						PPG, Paragraph 020
Sustainability, Energy & Climate Change	- Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough) - Rossendale LP Policy ENV7 (Wind Turbines)	- PfE Policy JP-S1 (Sustainable Development) - PfE Policy JP-S2 (Carbon and Energy) - PfE Policy JP-S3 (Heat and Energy Networks) - PfE Policy JP-S6 (Resource Efficiency) - Rochdale CS Policy G3 (Renewable and low carbon energy developments)⁷ - Rochdale CS Policy DM2 (Delivering Planning Contributions & Infrastructure)	Climate Change SPD	Climate Change Adaptation SPD	- NPPF Policies CC2, CC3, DP3, TR1, F2, F8 & N2 - Rochdale Borough Draft Local Plan Draft Policy S2 - Climate Change PPG	
Security & Crime	Rossendale LP Strategic Policy ENV1 (High Quality Development in the Borough)	- Rochdale CS Policy P3 (Improving Design of New Development) - Rochdale CS Policy DM1 (General Development Management Requirements)	N/A	- Urban Design SPD - Public Realm Design Guide SPD	- NPPF Policy P5 - Rochdale Borough Draft Local Plan Draft Policy DM1	
Waste	Lancashire Minerals & Waste CS Policy CS7 (Managing our Waste as a Resource)	- PfE Policy JP-S6 (Resource Efficiency) - Rochdale CS Policy G11 (Managing Waste)	N/A	N/A	- National Planning Policy for Waste (Section 5) - Waste PPG	

⁷ PfE Appendix A Table A.5 (Replaced Rochdale Local Plan Policies) confirms that the first paragraph of Rochdale CS Policy G2 (Energy and new development) is deleted. The general approach to renewable and low carbon energy developments is more up to date and provided in more detail within PfE Policies JP-S1, JP-S2 and JP-S3.

Shadow Flicker	Rossendale LP Policy ENV7 (Wind Turbines)	- Rochdale CS Policy G9 (Reducing the Impact of Pollution, Contamination and Land Instability) - Rochdale CS Policy G3 (Renewable and Low Carbon Energy Developments)	N/A	N/A	Renewable & Low Carbon Energy PPG, Paragraph 020
Telecommunications	Rossendale LP Policy ENV7 (Wind Turbines)	- PfE Policy JP-C2 (Digital Connectivity) - Policy JP-S2 (Carbon and Energy) - Rochdale CS Policy G3 (Renewable and Low Carbon Energy Developments) - Rochdale CS Policy E2 (Increasing jobs and prosperity)	N/A	N/A	- NPPF Policy P6 - Rochdale Borough Draft Local Plan Draft Policy S3 - Renewable & Low Carbon Energy PPG, Paragraph 017

Appendix 2: LPA Boundary



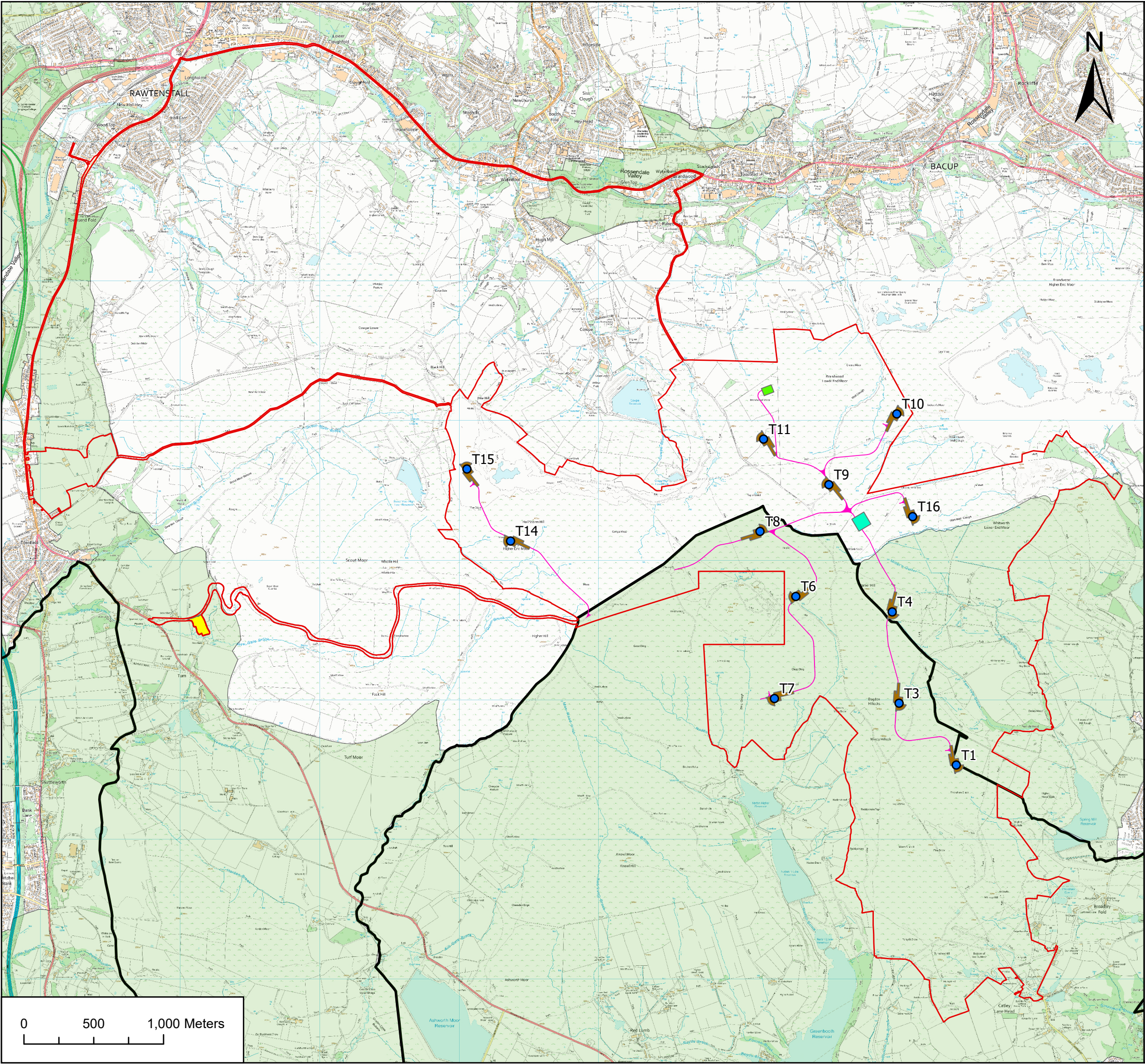
- Site Boundary
- Local Authority Boundary

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Ordnance Survey 0100031673

Rev	Date	Status	Auth.	Review.	App.
2.0	06.05.06	Final	JS	PR	JC
1.0	20.05.25	SS	JS	PR	RT

Scout Moor II

Site Location Plan



- Wind Turbines
- Green Belt
- Temporary Laydown Area
- Construction Compound
- Hardstanding Extents
- Substation
- Track Extents
- Site Boundary
- Local Authority Boundary

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Ordnance Survey 0100031673

Rev	Date	Status	Auth.	Review.	App.
2.0	29.04.26	Final	JS	PR	JC
1.0	20.05.25	SS	JS	PR	RT

Scout Moor II

Green Belt

Appendix 4: Summary of Published Green Belt Assessments

As set out in Section 14 of this PDAS, the Councils have published Green Belt Assessments for the area of Green Belt within which the Site is located. The findings of these assessments are summarised in this appendix.

Rossendale Green Belt Review

The Rossendale Green Belt Review¹ ('RGBR') was prepared by LUC on behalf of Rossendale Borough Council in preparation of Rossendale LP. The assessment determines the extent to which the land defined as being within the Green Belt contributes to the purposes of including land within it (as defined by the NPPF).

Part of the Site within Rossendale is identified as 'Parcel Ref. 71' of the RGBR (**Figure A6.1**) and its assessment is summarised in **Table A6.1**.

Figure A6.1: Green Belt Parcel Ref. 71

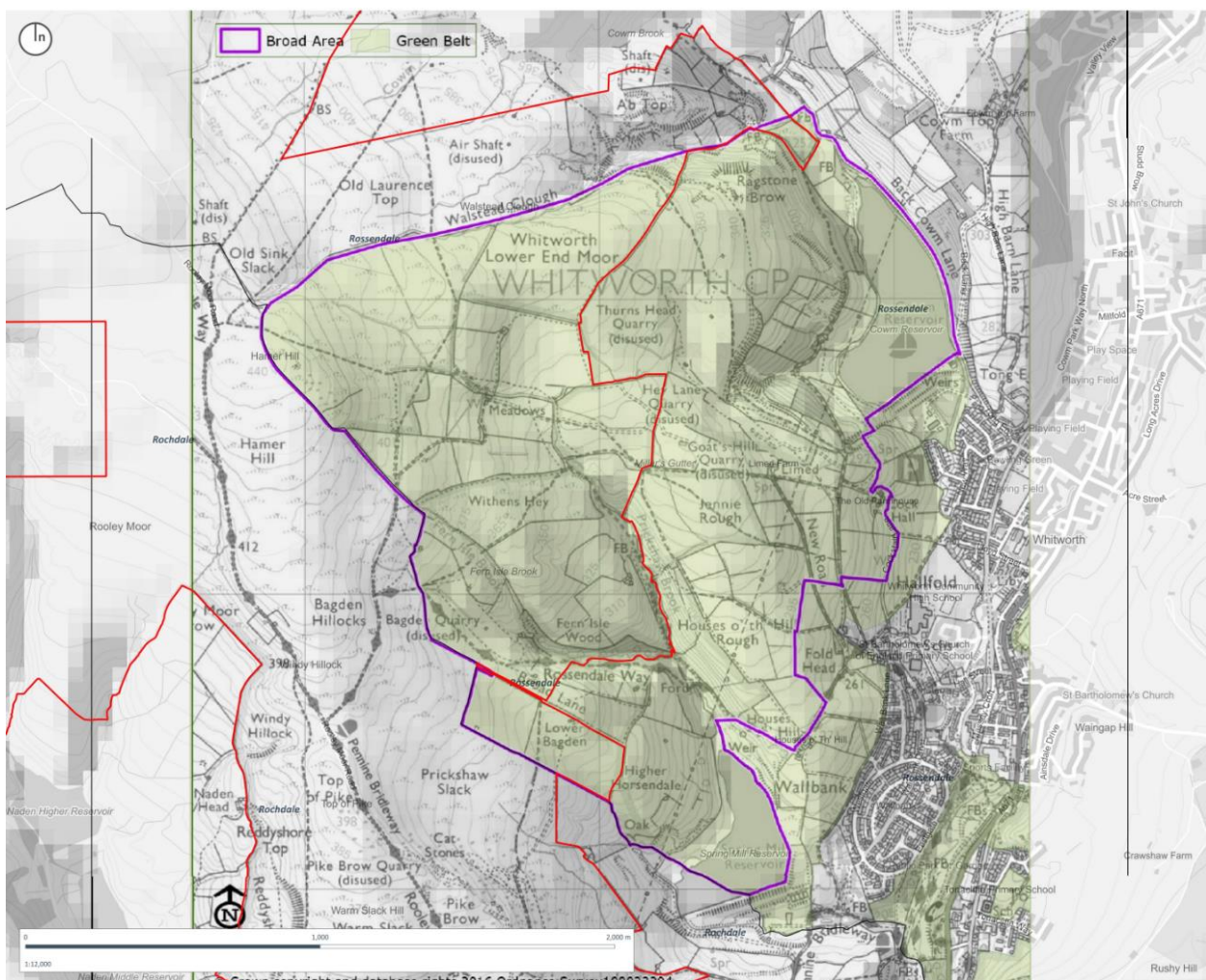


Table A6.1: Green Belt Assessment rating for Parcel Ref. 71 in Rossendale

Purpose	Rating	Notes
1	N/A	This parcel is a Broad Area which is not adjacent to the urban edge as it is separated by intervening parcels. As the parcel does not lie adjacent to the urban edge, it has not been considered further in terms of the role it plays in checking the unrestricted sprawl of the large built up area.
2	No contribution	This Broad Area is close to the settlement edge of Whitworth and lies between Whitworth and the settlements of Bacup and Stacksteads to the north-west. There is no intervisibility between Whitworth and these settlements due to the intervening higher ground of Holden Moor, Brandwood Moor and Rooley Moor. The parcel does not play a role in preventing the erosion of the visual gap between these settlements. Any new urban development within this parcel may be perceived as eroding the physical gap, although due to the considerable distance this will be very limited.
3	Strong	This is a broad area of countryside that contains relatively little urban development. The east of the area contains the Cowm and Spring Mill Reservoirs; these weaken the rural character in parts, though this is minimal. From the higher ground located within this area the neighbouring settlements of Shawforth and Whitworth are widely visible, although their visual influence is relatively limited. The area displays clear characteristics of the open countryside and has an intact rural character. The Green Belt designation in this area is considered to make a major contribution to safeguarding a large area of countryside from encroachment.
4	Moderate	Digital analysis, based on bare earth height data, indicates that this Broad Area is theoretically visible from the historic settlements of Bacup Town Centre, Rochdale Town Centre, Wardle, and Whitworth Square. In practice the higher ground located within this area has good intervisibility with Whitworth Square. The area forms a part of its wider setting and the openness of the land contributes positively the historic significance and special character of this settlement, albeit to a relatively limited degree.
5	No rating	All parcels make an equally significant contribution to this purpose.

Greater Manchester Green Belt Review

Part of the Site in Rochdale is identified as 'Parcel Ref. RD_BA02' in the Greater Manchester Green Belt Assessment² ('GMGBA') (**Figure A6.2**).

This large broad area is located to the north of Heywood, the north-west of Rochdale and the north-east of Bury. The parcel is located in the north-west of the Rochdale area. Landform rises steeply to the north;

² Greater Manchester Green Belt Assessment – Final Report (July 2016), prepared by LUC

characterised by Harden Moor, Knowl Moor and Rooley Moor. A patchwork of arable and pastoral land use is found at lower elevation. Field pattern is rectilinear to irregular and bound by a mix of weak hedge rows, treelines, stone walls and wire and post fencing. Notable landscape features include a sequence of reservoirs situated towards the centre of the parcel. Other features include Scout Moor wind farm, with well-spaced farmsteads and residence located at lower elevation. The A680 passes through the parcel and the M66 is located on the western outermost edge.

The GMGBA's appraisal of Parcel Ref. RD_BA02 is summarised in **Table A6.2**.

Figure A6.2: Green Belt Parcel Ref. RD_BA02

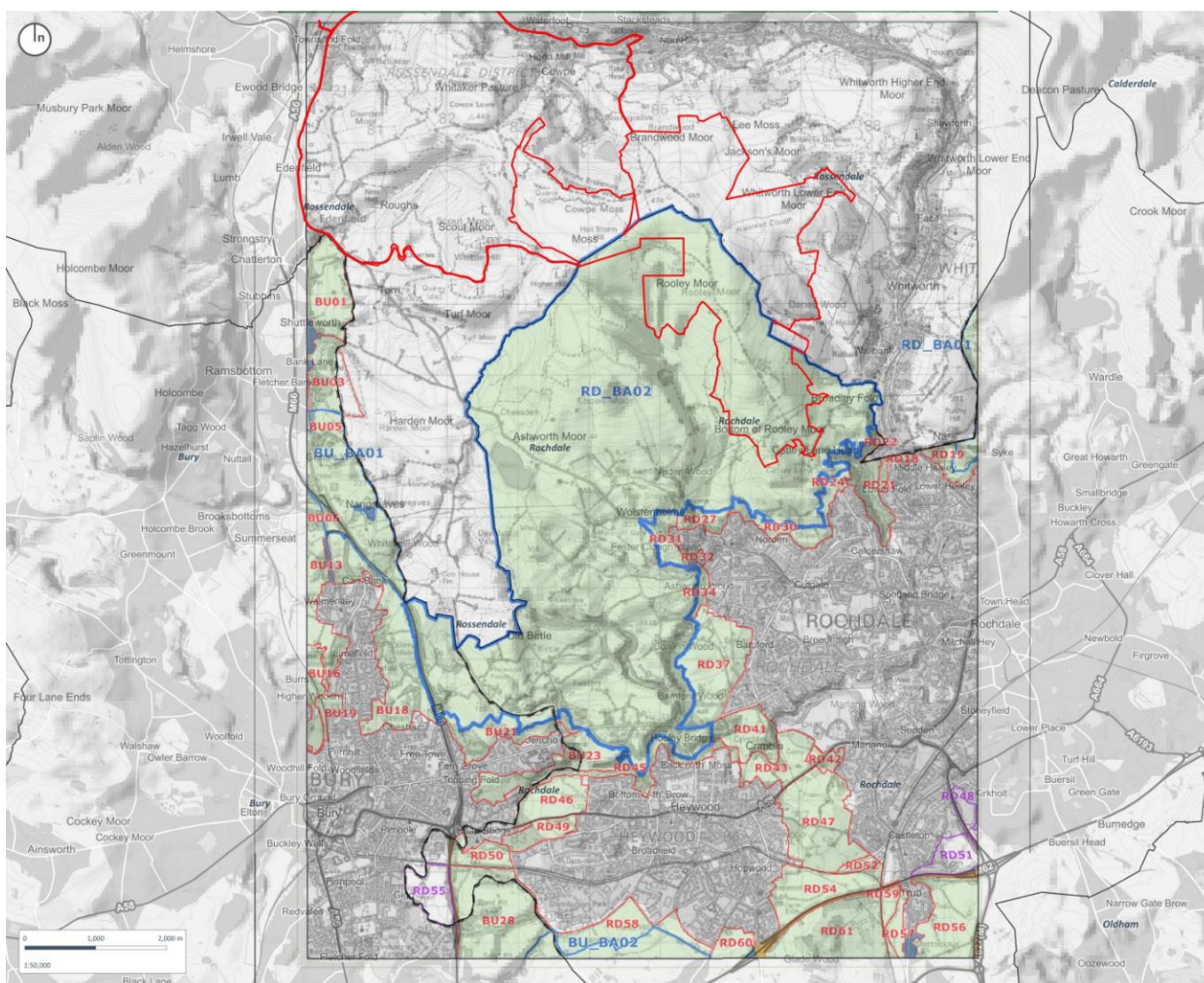


Table A6.2: Green Belt Assessment rating for Parcel Ref. RD_BA02 in Rochdale

Purpose	Rating	Notes
1	N/A	This parcel is a Broad Area which is not adjacent to the urban edge as it is separated by intervening parcels. As the parcel does not lie adjacent to the urban edge, it has not been considered further in terms of the role it plays in checking the unrestricted sprawl of the large built up area.
2	Strong	The broad area lies around the settlements of Norden and Rochdale to the north-east, Heywood and Heap Bridge to the south, and Bury to the west.

		Given the variable topography and considerable distance between those settlements in the west (Bury) and those in the east (Norden and Rochdale), the broad area does not play a significant role in preventing coalescence between these settlements. The parcel also makes little/no contribution to preventing coalescence between Norden and Rochdale given the high degree of merging which has already occurred between the settlements. The broad area does however prevent the physical coalescence or a clearly recognisable perception of merging of Heywood from Rochdale towards its western edge where the settlements are within approximately 500m of each other across this broad area.
3	Strong	There is limited/no sense of encroachment with the parcel being generally free of urbanised built development. The landscape within this parcel remains largely unspoilt by urbanising influences located outside its boundaries. It has an intact and rural in character and displays characteristics of the countryside.
4	Strong	Digital analysis, based on bare earth height data, indicates that this parcel is theoretically visible from the historic settlements of Ramsbottom, Rochdale (Town Centre), Rowlands and Wardle. In practice, the area has good intervisibility with the historic settlement areas located within the town of Rochdale and Bury. The area plays a key role in setting of these historic settlements. The openness of the land contributes positively to the historic significance of these settlements and helps to preserve their setting and special character. The Prickshaw & Broadley Fold and Ashworth Fold Conservation Areas are located entirely within this area. Additionally, the eastern most part of RD_BA2 is likely to be visible from within the Whitworth Sq Conservation Areas (outside Greater Manchester) and thus contributes to its setting.
5	No rating	Green Belt has the potential to make a strategic contribution to urban regeneration by restricting the land available for development and encouraging developers to seek out and recycle derelict / urban sites. It is difficult to distinguish the extent to which each Green Belt parcels delivers against this purpose and therefore this study will not undertake a parcel by parcel assessment of the contribution made in relation to Purpose 5.

Turley Office
Manchester

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