

27/8/2019

To the Inspectors
Rossendale Local Plan

Dear Sir and Madam,

Re. Rossendale Local Plan Hearing Submission

I am a local GP and live near Ramsbottom and would like to submit the following to the Rossendale Local Plan Hearing. I have already made submission to the Draft Local Plan during the consultation process.

I would like to attend the Hearing Session; Matter 16: Environment, on the morning of Wednesday, 2nd October but will have to leave early. I would be grateful if this can be accommodated.

Matter 16 – Environment

[Policies ENV1 – ENV10]

ENV 1. As a GP, I wish to promote good health and wellbeing in the population. It is good to see that Rossendale recognises the need to promote health and wellbeing throughout the Local Plan. I believe it is important to preserve the natural environment of Rossendale. The South Pennines Wind Energy Landscape Study 2014 by Julie Martin and Associates says *there are extensive views from elevated locations in all directions. The open and broadly level plateau tops provide uninterrupted visibility over long distances, with wide horizons, big skies and a strong sense of relative isolation and remoteness.* I believe any wind turbine development on the Rossendale Moorland would destroy the sense of happiness and wellbeing that is provided by these essential green spaces and impact adversely on health. The Local Plan states at ENV1 k *Providing landscaping as an integral part of the development, protecting existing landscape features and natural assets, habitat creation, providing open space, appropriate boundary treatments and enhancing the public realm;* I believe that this requirement can only be met if there is no more wind turbine development on the Rossendale Moorland.

At **ENV 2** I agree that Heritage Assets should be titled Historic Environment as there seems to be more accent on buildings rather than landscape in the Local Plan.

With respect to Heritage Assets/Historic Environment, I am surprised that Waugh's Well is not mentioned. This is situated just above Scout Moor High Level Reservoir and just below the edge of the Scout Moor plateau. It a beautiful place, well worth a visit. Here at Foe Edge Farm in 1865 the dialect writer and poet, Edwin Waugh (1817-1890) was invited to stay by his friend Edmund Chattwood of Bury. He spent some months there and on this and later visits he produced some of his best work. In 1866 Mr Chattwood built a well at the farm in his honour. This memorial has been rebuilt since, especially at the centenary in 1966, and a bust has been added. The farmhouse was demolished and removed in the 1970s. Every year the Edwin Waugh Society organise a walk to the Well. Waugh's Well is in an area which has been selected as an area of possible wind farm development which would impact adversely on its beauty, heritage worth and the historic environment.

ENV 3. I believe strongly that all development proposals should meet the requirement of this policy. In particular development proposals should *not have an unacceptable impact on skylines*. This would impact on wind turbine development which as a consequence should not be allowed on the Rossendale Moorland.

ENV 7. I am a GP and have interest in the health impact of wind turbines on human health. I am a medical practitioner and not a noise expert, neither am I anti-wind turbine but I am concerned about where they are placed. I gave evidence at the Scout Moor Windfarm Public Inquiry in 2016, where the proposed Scout Moor Wind Farm Expansion was rejected. Please see attached Appendix 1. The main detrimental health impacts are annoyance and sleep disturbance caused by the amplitude modulation (AM) of wind turbine noise, the audible *swish* and *thump*. This noise can cause problems up to 1.5km away. So an AM noise condition is essential and the siting of wind turbines is also most important. The noise issues must be investigated thoroughly before any turbine goes up, no after. Ref Appendix 1

In respect to the impact of the construction of a wind turbine on the moorland, a 100 ft. wind turbine requires a foundation of 225 cubic metres of concrete and 32 tonnes of steel reinforcing. This together with the required tracking will significantly impact on peat and blanket bog, affecting water retention and run off and is likely to increase the chance of flooding. Peat will be reduced as will the carbon capture by the peat so increasing global warming. Ref Appendix 1

With respect to the blanket bog and peat it is imperative that development on deep peat (over 40cm depth) or blanket bog within the area suitable for wind turbines is avoided. This is in line with Natural England's guidelines in A Strategy for the Restoration of Blanket Bog in England. Peat and blanket bog are of the utmost importance for carbon capture and to prevent Global Warming.

In the Local Plan, using the South Pennines Wind Energy Landscape Study 2014 by Julie Martin and Associates, *areas suitable for commercial Wind Turbines have been identified on the Policies Map. Single, and exceptionally, small groups of Turbines of up to 59m may be suitable in the “Enclosed Uplands Areas Suitable for Wind Turbines” shown on the Policies Map. New larger turbines or re-powering of existing ones may be considered on the “High Moorland Plateau Areas Suitable for Wind Turbines” shown on the Policies Map, provided areas of deep peat (over 40cm depth) and blanket bog are avoided.*

However in the same study the High Moorland Plateau, Moorland Hills, Enclosed Uplands and Moorland Fringes/Upland Pastures are shown to be largely covered with deep peat and blanket bog. Wind turbine development would be prohibited here as the peat depth will almost certainly be greater than 40cm.

The best way to avoid all these inherent problems is to rule out wind turbine development on the Rossendale Moorland all together.

The Ministerial Statements of 2015 altered planning policy and although reference is made to them in Explanations at 198 in ENV7 this is not listed in the Criteria list that needs to be addressed before development can go ahead. The following Explanation should be in the Criteria List. *It is particularly important that, in line with the Written Ministerial Statement of 2015, the planning impacts identified by the affected local community are fully addressed and the proposal therefore has their backing.*

Rossendale and surrounding areas have seen considerable wind turbine development over the last few years and the Government accent is now on the development of off-shore wind energy which is more reliable than on-shore. It would appear that we have enough onshore wind turbines already. A Ministerial statement from the Department of Energy and Climate Change in June 2015 stated the following:-

In 2014, onshore wind made up around 5% of electricity generation, supported by around £800m of subsidies. At the end of April 2015, there were 490 operational onshore wind farms in the UK, comprising 4751 turbines in total. These wind farms have an installed capacity of 8.3GW enough to power the equivalent of over 4.5 million homes. The Electricity Market Reform Delivery Plan (2013) projects that we require between 11-13 GW of electricity to be provided by onshore wind by 2020 to meet our 2020 renewable electricity generation objective while remaining within the limits of what is affordable. We now have enough onshore wind in the pipeline, including projects that have planning permission, to meet this requirement comfortably. Ref Appendix 1

In summary then the Rossendale Local Plan has much to recommend it. It has been a wide ranging, careful and detailed submission. The areas I have concerns about are the following:-

1) Whether the Plan can adequately protect the health and wellbeing of the population with respect to AM noise nuisance and the loss of the openness of the Rossendale Moorland.

2) The failure to include Waugh's Well as a heritage asset/historic environment.

3) Whether the Plan can effectively protect sky-line development if wind turbines are erected.

4) Wind turbine development would lead to important peat and blanket bog loss and an increase flood risk.

5) The inconsistency in the Plan in that areas of wind turbine development have been allocated where the peat and blanket bog is probably the deepest. In line with Natural England recommendations no development should take place on peat with a depth greater than 40cm and on blanket bog. It is essential that this limit is kept in the list of Criteria to be met before development can go ahead.

6) The Ministerial Statement of 2015 *is particularly important that, in line with the Written Ministerial Statement of 2015, the planning impacts identified by the affected local community are fully addressed and the proposal therefore has their backing.* This must be included in the list of criteria that have to be met, not just in the Explanations at ENV7 198.

To conclude the clearest way address these various points is to prohibit wind turbine development altogether on the Rossendale Moors.

Many thanks

Yours sincerely

Chris Woods

Dr C.J.Woods MBChB. MRCP.