

28/08/2019

To the Inspectors

Re: Rossendale Local Plan Hearing Submission

Dear Inspectors,

My name is Alan Rawsterne, I am a trustee and secretary of Rooley Moor Neighbourhood Forum (RMNF - see: www.RMNF.org.uk). I am also a resident who lives near Rooley Moor, which is close to an area identified in the Rossendale Local Plan as suitable for wind turbines.

A previous submission, with ID number 1775, has been made during the consultation process on behalf of RMNF. I would now like to submit the following to the Rossendale Local Plan Hearing and participate in the morning session with the inspectors on Wednesday 2nd October 2019, to discuss Matter 16 – Environment [Policies ENV1 – ENV10]

In particular I wish to comment on MIQ point f). *“Does Policy ENV4 promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity as required by paragraph 174 of the National Planning Policy Framework?”*

Policy ENV4: Biodiversity, Geodiversity and Ecological Networks

My comments are with regard to wind turbines.

Policy ENV4 states:

Development proposals that have potential to affect a national or locally-designated site, as shown on the Policies Map and its immediate environs, or on protected habitats or species, will be expected to be accompanied by relevant surveys and assessments detailing likely impacts. A sequential approach should be followed to avoid harm and where possible enhance biodiversity, and where not possible, provide appropriate mitigation and, as a last resort, on and off-site compensatory measures to offset the impact of development.

My comment:

There is sufficient opportunity to evaluate the affects of existing wind farms in the area to be able to determine the suitability of the land allocated. Looking at the decision of the Secretary of State on the Scout Moor extension proposals, it clearly demonstrates that a tipping point has been reached where the landscape can no longer accommodate additional turbines. Rossendale council’s own landscape consultee to that planning application (as recorded in the officer’s report to committee) recommended that the landscape impacts of additional turbines would be unacceptable.

The British Trust for Ornithology's Breeding Bird Survey, surveys a 1-km square at grid reference SD8519 (Cowpe Moss) and I’ve included a summary of this information in Appendix 1. You can see there is a decline in Curlew, Golden Plover and Lapwing that co-inside’s with the construction of Scout Moor, which began in January 2007 and went live in September 2008.

You will also note an increase in Carrion Crow, Lesser Black-backed Gull and Rook, which might be attributed to changes in farming practice due to the introduction of wind farms. It is also worth noting that numbers of Meadow Pipits and Skylarks don't appear to have been affected.

A comprehensive and independent review is required to establish the affect on the environment of Scout Moor and other wind turbine sites in the area. Any review should include understanding the affect of opening up the moors to illegal off road use, which in turn affects wildlife and grazing for

those with rights of common. There are Commoners who believe farming the uplands in our area is seriously under threat and becoming unviable because of the adverse affects brought about by wind farms. We also need to understand how Scout Moor and other wind farms in the area have increased the recreational use of the moors, with service roads giving ease of access, etc. and the affect this has on the environment. Unfortunately, there appears to be little management of the moor to mitigate any adverse affects.

A similar study is required to understand the affects on bats and mammals.

It is important to consider the ecological value of the moors (whether designated or not) and to safeguard the hydrological process, which maintains the groundwater dependant ecology of blanket peat. The impact of existing wind turbine foundations, access tracks and drains on hydrology and ecology should be evaluated and understood before considering any further development.

The report from Natural England, "Assessing Impacts of Wind Farm Development on Blanket Peatland in England" recommends that an Environmental Impact Assessment (EIA) should:

- Include an assessment of dewatering effects, sediment, erosion and nutrient control, peat stability, impact of tracks and drains on hydrology and ecology, water quality and re-vegetation measures. This should be based on a thorough understanding of the baseline conditions at the site, including the habitat types present.
- Include an assessment of cumulative impacts and impacts outside the site boundary. The geographical boundary of the EIA may need to be much larger than the development site area and may be revised during the scoping stage of the EIA.
- Assess the impacts of any potential changes to the original design [in this I would also include any micro siting allowance that might be considered necessary for the construction of turbine foundations].
- Use widely recognised methods. It should be noted that the unusual properties of peat and its variable nature mean that geotechnical techniques developed for mineral soils should be applied cautiously on peat, as the physical properties of peat differ from other soils and sediments. These differing properties should be accounted for in working within a peat environment.
- Assess a scheme as a whole rather than in smaller sections.

Policy ENV4 continues:

Provision of, or contributions to creation of, Sites of Suitable Alternative Natural Green Space (SANGS) will be sought where development would have an individual or cumulative impact on Priority Species resident in or making use of habitat in the Borough

My comment:

Why destroy what we already have? Natural England has published guidelines in, "A Strategy for the Restoration of Blanket Bog in England" and we know the destruction of blanket bog and peat should be avoided as they are of the utmost importance for the capture of carbon to help prevent Global Warming.

Conclusion

I believe it is important to preserve the natural environment of Rossendale and the best way to do this is to rule out wind turbine development on the Rossendale Moorland all together.

Yours sincerely,

Alan Rawsterne

Appendix 1

8/25/2019

Grid Square Summary | BBS Online

BBS Grid Square Summary - SD8519

The following table shows the Bird species recorded per year, and the highest count of that year from either visit.

Bird Species Records

Species	Max number of individuals per year																
	1997	1998	1999	2000	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Canada Goose					1			2									
Carrion Crow	8	23	8	9	9	21	18	152	60	61	91	36	77	46	70	51	158
Cormorant							2										
Curlew	6	10	3	3	8	3	9	4	2	1	1	2	3	1	3	1	
Golden Plover			6	3	10	1	2					1					
Grey Heron							2										
Herring Gull														1			
House Martin							3										
Jackdaw								5				6	4	1			6
Lapwing					2	2				1							
Lesser Black-backed Gull			4	4			1			4	13	18	253	82	48	72	391
Linnet							1										2
Mallard					2								2			1	
Meadow Pipit	48	18	25	25	29	18	17	23	21	27	13	15	28	16	28	25	17
Merlin				1													
Peregrine			1														
Pied/White Wagtail															1	1	2
Raven					2	4			1		1	2	4				
Reed Bunting				1			1						1	1	1	1	
Rook					1			15	5	62	16	54	36	101	48	14	34
Sand Martin			1														
Skylark	2	9	20	35	31	23	28	30	23	21	26	18	25	21	24	20	22
Snipe					1												
Spotted Redshank					1												
Starling		15						4		1		1					10
Swallow			1	3						1		2	4	1			1
Swift				2	4	1	4				2			2			1
Twite			1	1													
Wheatear		7	3	1	1		4			2	2	6	5	1	2	3	
Woodpigeon					2												
Number of species (total: 30)	4	6	11	12	15	8	13	8	6	10	9	12	12	12	9	10	11