

MIQ response re Matter 16 from PBFCA 5147

Prickshaw and Broadley Fold Conservation Area – Response Paragraph 16J

I have lived in the Conservation Area of Prickshaw and Broadley Fold since 2002 and I am Chair of the Conservation Area Committee which was formed following applications by SMWFEL (Peel) and Coronation Power to expand the wind farm on Scout Moor. P&BFCA is one of the Communities named as being under the umbrella of the representation made on behalf of those communities by Tom Whitehead

I am aware that others will be making representations to you about Wind Farm development within Rossendale but I would like to add to those representations by referring specifically to the potential damage to the embedded peat and blanket bog on site and the lessons learned from the Scout Moor Phase 1 wind farm and from the SMWFEL Application which went to Public Inquiry in 2016 after being called in by the SoS.

After the SMWFEL Inquiry, I decided to retain the written ‘expert witness’ statements used by Peel in their Application to expand the Scout Moor wind farm. Included in the bundle of documents are two volumes by Penny Anderson. These contain opinions on the content of the moorland and the proposals for a managed MRMP (Moorland Restoration Management Plan).

Paragraph 16J within the MIQ document includes some concerns about Rossendale’s potential lack of attention to the peat found on large parts of Scout Moor (including the potential expansion development site). We understand that Rossendale’s Local Plan incorporates the acceptance of a proposal by Natural England that no turbines should be erected on land where the peat cover exceeds 40cm. We fully support this initiative. It is well documented that our peatlands play a crucial role in the carbon cycle and in helping to tackle climate change. Ecosystems like peatlands store significant amounts of carbon dioxide and preservation is critical. We firmly follow the inference that our natural peatland environments must be left alone. Penny Anderson’s evidence is helpful. In her Document APP/PA/1 at Appendix Figure 3 you will find her “Peat Depth and Active Peat Map”. This is a useful document for two reasons

1. It identifies specific depths of peat across the whole Wind Farm sites – existing and SMWFEL. There are six depth categories ranging from 0-0.1m to >3.0m. We must assume (initially, at least) that the information is reliable but it would be interesting to get a second opinion on this because we are unsure how accurate it is. Users of the moorland – Commoners, walkers etc all agree that the peatlands are extensive and deep.
2. If we compare this map with the MRMP Area map it is easy to see just where the individual turbines within the SMWFEL Application would have fallen, in terms of the existing peat depth sites.

If we assume that the SMWFEL turbine siting might be revisited in a future Application, we conclude (from their own evidence) that the individual peat depths might be these:

T1 1.0 - 2.0M
T2 0.5 – 1.0M
T3 0.5 – 1.0M
T4 1.0 – 2.0M
T5 1.0 – 2.0M
T6 0.1 – 0.5M
T7 0.1 – 0.5M

T8 and T9 - no peat depth shown presumably because their sites are outside the designated MRMP Area
T10 0.1 – 0.5M
T11 0.1 -0.5M
T12 0.5 - 1.0M
T13 0.1 -0.5M
T14 2.0 – 3.0M
T15 0.5 - 1.0M
T16 1.0 -2.0M

We support the proposal that there must be no further development on areas of embedded peat in excess of 40cm and, straight away, we can see that Turbines T1, T2, T3, T4, T5, T12, T14, T15 and T16 would fail the 40cm test. Depending on the actual depth of their neighbours, turbines T6, T7, T10, T11 and T13 may also be vulnerable but all will fail if they are above the critical 40cm depth test as we suspect they will be. On the face of it, T8 and T9 seem to be OK but the peat depth map is incomplete because the locations of those turbines are outside the proposed MRMP Area. Their nearest neighbour is T7 so we may assume that the peat depth will be something between 0.1 and 1.0 and therefore vulnerable to the 40cm test. We must also consider the location of the arterial roads. For example the site of T11 may be OK (just) but the access track would be across peat in excess of 40cm.

Whilst there may be scope for some micro-siting, the overall impression is that any further development will have some problems with peat depth if the 40cm ruling is enforced. Indeed, it is clear from an examination of Ms Anderson's map (when overlaid with siting details of the existing 26 turbines) that the areas of 'shallow peat' have already been exploited. It is also clear to anyone who takes the trouble to walk through the existing wind farm that the damage done is considerable, it is permanent and it will never be restored. It is a 'dead zone', devoid of life and grazing animals and it is badly scarred. The huge quantities of alien material embedded in the moorlands must not be added to by further construction. Ms Anderson's MRMP (Moorland Restoration Management Plan) document provided no believable expectation that the moorland would be restored to its pre-development state, it offers no opinion on the huge clean-up costs (there are no funds set aside for this, of course) and it was clear from discussions with representatives from Peel Energy that 'restoration' actually meant skimming the surface from the miles of arterial roads and covering the permanent concrete and reinforced steel turbine foundations. "Restoration" means "putting everything back to how it was" and that will simply not be possible. If there is to be any restoration work on enhancing our upland peat landscape then it beggars belief that it must be accompanied by a wind farm expansion programme.

I would be grateful if you will make this communication available to the Inspectors and ask them to exercise extreme caution regarding any plans to permit more wind turbine development on our valuable moorlands.

Three hard copies of this submission will be sent separately

Thank you and kind regards,

John Newcombe
Prickshaw & Broadley Fold Conservation Area Committee