

Dear sirs,

REPRESENTATION TO THE ROSENDALE LOCAL PLAN, DATED 9 OCTOBER 2017

Please accept this representation on behalf of a collective of individuals and community groups who came together to resist the Scout Moor Windfarm extension proposals (Rossendale), and the Rooley Moor Windfarm proposals (Rochdale).

Following these two successful campaigns, as well as campaigns against other individual turbine proposals locally, the group's purpose has evolved and now includes resisting inappropriate wind turbine development in the wider north-Manchester uplands, including land in Rossendale, Bury, Rochdale and Blackburn with Darwen.

The group has serious concerns as to the draft Rossendale Local Plan policies pertaining to wind turbine development, and these are elaborated on below. Requests to amend policy are **highlighted blue** for ease of reference.

A schedule of the signatories to this submission is set out at the foot of this representation.

REGIONAL IMPORTANCE OF THE 'UPLANDS'

By way of a context, the October 2016 draft Greater Manchester Spatial Framework (GMSF) identifies "the north Manchester uplands" as a regionally important landscape, for the benefit and utility of people from the wider city region (Policy GM10). The uplands provide a valuable visual, environmental and recreational resource to the region, and are precious in their very 'open-ness'.

Whilst Rossendale is not within Greater Manchester, its administrative area lies intimately between and around the GM authorities of Bury and Rochdale, and the moorland and upland in Rossendale's south-western sector (notably Scout Moor and the moorlands north and east of Ramsbottom) function inescapably as part of this greatly valued Greater Manchester regional upland resource.

To demonstrate this regional importance, the draft GMSF policy said:

"The distinctive upland landscape, including large scale sweeping moorlands, pastures enclosed by dry stone walls, and gritstone settlements contained in narrow valleys, will be protected and enhanced as part of the wider Pennine area extending to the north and east of Greater Manchester.

The achievement of the following priorities will be particularly important:

- 1. Significantly extend the area of active blanket bog, both through the protection of existing sites and the restoration of degraded areas, thereby helping to retain and capture carbon, support priority species and habitats, improve water quality, retain water, manage run-off and reduce soil erosion;*
- 2. Enhance the full range of moorland habitats as part of an ecologically connected network, including improving upland meadows, to support increased wildlife populations and enable them to adapt to climate change;*
- 3. Maintain the sense of remoteness, protect historic landscape features, and enhance views of and from the area, as key aspects of local distinctiveness, tranquillity and identity;*

4. Enhance public access and promote the enjoyment of the landscape, in a manner compatible with conserving the environmental and historic qualities, thereby supporting a high quality of life, healthy lifestyles and the attractiveness of Greater Manchester for visitors."

Whilst in draft, this policy was included in the GMSF from the outset, and clearly demonstrates a recognition at the GM level the value of these uplands. This position reflects the position of Natural England, who identify this area as within the South Pennine Character Area.

Given this regional significance, the north Manchester uplands are to be read as one collective of spaces, despite the considerable expanse of area they occupy, and despite straddling various different local authority administrative areas.

LOCAL PRECEDENT & LANDSCAPE VALUE

The decisions of three recent planning applications for turbines or groups of turbines within this GM uplands area have been taken at either Secretary of State or Planning Inspectorate level. We identify these decisions below, and in each instance, summarise the reason for refusal:

1. Scout Moor Windfarm Extension (DCLG reference APP/B2355/V/15/3139740; refused at SoS call-in; decision dated 6 July 2017); *the proposed development would be visible from Ramsbottom and surrounding Bury settlements. The SoS observed that "the proposal sits within an area of valued landscape because of its openness, tranquillity and attractive views", and "would introduce prominent views of turbines where none currently exist"; in concluding, the Secretary of State factors in to the planning balance the energy-generation benefits of the proposal, and yet concludes in "weighing the benefits of the scheme against the likely harm...the planning balance falls against granting planning permission". The SoS also gave considerable weight to the level of opposition expressed by 'Affected Communities' (a term introduced by the June 2015 Written Ministerial Statement for onshore turbine development).*

2. Rooley Moor Windfarm, Rochdale; reference 14/00877/FUL, determined 25 June 2015. Reasons for refusal included "Rooley Moor is specifically identified as 'unenclosed moorland' with a wild and tranquil landscape character. The proposed development of twelve turbines would have a detrimental impact on the landscape character of the area, from both short range and longer distance views and both individually and cumulatively when viewed with existing and proposed wind farm developments in the area."

3. Turbine at Gatehouse Farm, Bamford Road, Ramsbottom (Turn Village), Bury, BLO ORT; appeal reference: APP/B2355/W/16/3152975, dated 29 November 2016. *The inspector found that 'the totality of harm would not be outweighed by the environmental benefits'.*

It is clear that, despite claimed energy-generation benefits of turbine development, the adverse landscape impacts of such developments across this north-Manchester upland area clearly outweigh any claimed benefits. Given the regional significance of the north-Manchester uplands, these recent decisions give considerable weight towards the policy commentary set out below.

POLICY PROPOSALS & COMMENTS

Draft Policy SD2

The Green Belt boundary should be extended in the area south of Rawtenstall to meet the southern boundary of Rossendale's borough boundary.

This would assist in protecting against ‘urban sprawl’ (wind turbines and ancillary development being urbanising), to assist in safeguarding the countryside from encroachment, and to protect the character and setting of historic towns. These are of course three of the five purposes of Green Belt as defined in NPPF; there is therefore a compelling case for this.

At the time the current Green Belt boundaries were set previously, it would have been inconceivable for the threat of windfarm development of the scale now present and threatened. There is a compelling need to update policy and land allocations to reflect modern challenges.

Draft Policy ENV4

We object in the strongest terms to draft policy ENV4 as presently worded.

The policy wording in itself recognises the value of the landscape, and is to be commended. However, the supporting text (which forms a functional role in interpreting the policy) and the illustration at ‘Figure 1’ are seriously flawed.

The decision of the Secretary of State on the Scout Moor extension proposals, clearly demonstrates that a tipping point has been reached where the landscape along the M66 corridor can no-longer accommodate additional turbines. The Julie Martin study referred to dates back to 2014, is out of date, and has been discredited through the Scout Moor call-in process. Indeed, the 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.

Given policies elsewhere in the Plan deal with wind turbines, all reference to turbines in Policy ENV4 should be deleted.

Figure 1 should not illustrate turbines as this implies they sit comfortably in the landscape; instead they are regarded as alien in the landscape, contrary to all commentary in the GMSF and Natural England guidelines to this very landscape, and we do not accept that they are an established baseline to be recorded.

Draft Policy ENV8

We object to this policy in the strongest terms.

The policy and supporting text talk in positive terms about areas ‘being suitable’ for turbine development. One thing that is clear from the appeal and call-in decisions referred to earlier in this representation is that the appropriateness or otherwise of turbine development within a landscape is a hugely complex matter; a pro-turbine policy such of ENV8 fails to recognise this complexity.

The draft supporting text refers to the June 2015 Written Ministerial Statement, and recognises the importance of local opinion emphasised in that WMS. The Scout Moor public inquiry heard that 97% of respondents to that application were against the proposal. This reflects the sentiment of the local community when the existing Scout Moor development was consented a decade ago (at that time Rossendale refused the planning application). Turbines are not welcome in this landscape, and the community does not wish to see additional turbine development.

The draft policy again refers to the Julie Martin study, which dates back to 2014; we'd restate that that document is out of date, and has been discredited through the Scout Moor call-in process. Indeed, the council's own landscape consultee to the planning application (as recorded in the officer's report to committee) recommended that the landscape impacts of additional turbines would be unacceptable.

There is no need for a 'wind turbine area of search'; it is not a requirement on the LPA.

Policy ENV8 should be deleted, and the tests set out in draft policy ENV9 instead relied upon (subject to our further comments to that policy).

Draft Policy ENV9

We object to this policy in the strongest terms.

The starting presumption is that turbines 'will be supported'. Given the recent decisions cited above, this should not be the starting position of the LPA.

The draft policy again refers to the Julie Martin study, which dates back to 2014; we'd restate that that document is out of date, and has been discredited through the Scout Moor call-in process. Indeed, the council's own landscape consultee to the planning application (as recorded in the officer's report to committee) recommended that the landscape impacts of additional turbines would be unacceptable.

There should instead be a presumption against turbines, and any proposal for turbines should be assessed in accordance with the tests set. Reference to the Julie Martin study should be removed.

Draft Policy ENV10

We object to this policy.

Whilst renewable energy may be appropriate on a very small-scale (single dwelling), the LPA should adequately prepare for applications for 'solar farms' (or other large scale renewable energy development): large-scale solar development would have a considerable adverse impact on the landscape, and any policy should set out the tests to be met *within* the policy itself (not in the explanation) in order to give the tests the status; this is the approach the LPA has already taken with draft policy ENV9.

Tests should be added to the body of the policy, to ensure that the adverse impacts of such development are properly considered, and additional tests considered (such as those in draft ENV9).

Proposed New Policy

We propose a policy covering all the upland areas, explicitly recognising the value of the open-ness in accordance with draft policy GM10 of the GMSF, and how incongruous structures, such as turbines, would be considered inappropriate development and refused planning permission

We propose a policy that all existing turbine development is to be regarded as inappropriate development, that there is a presumption to reinstate the open-ness of the uplands, and that upon expiry of planning permission in each instance there shall be a presumption against renewal of those consents.

This group will work constructively with the LPA through its Local Plan review to ensure that that a robust defence is made of the open-ness of these uplands. Parallel representations will also be made the local plan reviews in neighbouring authorities, and to the GMSF.

Tom Whitehead MRTPI MCIPR

Acting pro-bono on behalf of community groups

Signed on behalf of:

- Rooley Moor Neighbourhood Forum
- Holcombe Society
- Bury Rural Inequalities Forum
- Ramsbottom Heritage Society
- Prickshaw & Broadley Fold Area Community Group
- Rossendale Harriers club
- Friends of Rooley Moor
- Whitworth Residents
- Turn Village Residents
- Townsend Fold Residents
- Affetside Society
- Lane Head residents group
- Edenfield Village Residents Association
- Rochdale & Bury Bridleways Association committee
- Rural Rossendale Trust Accommodation Providers
- Norden Area Forum