



The Wildlife Trust for  
**Lancashire  
Manchester &  
North Merseyside**



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And

Planning and Development  
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17<sup>th</sup> January 2025

FAO Planning Teams

Dear Planning Teams

**RE: 2024/0495 | ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING OPINION | SCOUT MOOR  
GINCROFT LANE, EDENFIELD, BURY, LANCASHIRE.**

**AND**

**24/01241/SCO | SCOPING OPINION IN RESPECT OF THE ERECTION OF UP TO 21 WIND TURBINES  
UP TO 180M IN HEIGHT WITH A GENERATING CAPACITY OF 100MW3 WITH ASSOCIATED  
INFRASTRUCTURE AND ACCESS, INCLUDING RESTORATION AND ENHANCEMENT OF DEGRADED  
PEAT MOORLAND | LAND AT ROOLEY MOOR, ROCHDALE.**

The Lancashire Wildlife Trust have had the opportunity to view the above scoping proposal and we would like to provide the following comments and observations.

The report appears to be fairly comprehensive and covers what we would wish to see within the EIA. There are however a number of issues relating mainly to peat soils that we feel need to be highlighted now as they are an important aspect of the upcoming EIA process.

Whilst the Trust would welcome the restoration and enhancement of degraded areas of peat moorland within the area, we do not feel that this should come at the expense of permitting

development on existing deep peat deposits. The proposal as outlined would allow peat of up to 1m in depth to be stripped away, and whilst the proposal is then to re-instate the peat or utilise it in restoration elsewhere within the project area, we have deep concerns regarding the success of such a scheme. It is strongly recommended that a thorough chemical and profile analysis of the peat needs to be undertaken before stripping and movement of the peat. This will be necessary to avoid the potential release of pollutants that might have built up in the peat from the industrial revolution. Such peat soils should not be used within any restoration proposal, as it has the potential to inhibit the growth of bog vegetation. We will naturally be commenting on the peat management plan when this becomes available, however, the Preliminary Environmental Management Plan (PEMP) does provide some indication of how the peat stripped peat is to be handled. Within the PEMP, the section on peat slide management refers to storing the stripped peat in peat mounds before moving the peat to the borrow pits or to the restoration areas. This process will invariably mix up the peat profile and could potentially change the physical and hydrological properties of the peat, thereby making it unsuitable for restoration purposes. We strongly recommend that the stripped peat is not stored but should be utilised immediately for the purpose assigned. The peat soils should also be kept wet throughout the process and mixing of the different peat layers prevented or at least minimised.

Notwithstanding the management approach to the stripped peat, the Trust opposes the stripping of any peat soils as part of the development. The current National Planning Policy Framework (NPPF, December 2024) recognises that blanket bog peat is an irreplaceable habitat. Paragraph 193 sub section c) states that development resulting in the loss or deterioration of irreplaceable habitats should be refused, unless there are wholly exceptional and a suitable compensation strategy exists. We have concerns regarding the success of the compensation strategy as outlined below and are especially confused as to why an arbitrary cut off of less than 1m of peat has been chosen. In England, the national designation of deep peat is defined as any area of peat over 40cm in depth, the disturbance and/or damage to such deep peat reserves must therefore be avoided.

However, it is also worth stressing that even peat at a shallower depth than 40cm has its part to play in maintaining the function of a peat bog, which is often underestimated. The International Union for Conservation of Nature (IUCN) highlighted this problem in their report 'Use of peat depth criteria: Accounting for the lost peatlands'. The IUCN report highlights that the definition of peat has historically been based on the exploitative potential of the peat resource, rather than being derived on the basis of hydrology, ecology, biodiversity or other non-exploitative ecosystem services. The report goes on to say that defining peat and peatlands is important, as the presence of peat is often now a lynchpin for land use policy. The report also stresses that whilst applying a minimum depth criterion can help to protect peatlands, it should be recognised that in providing this cut-off point, there is a danger that a fixation on depth could exclude extensive areas of sensitive shallower peat soils. The IUCN report argues that too often, these shallow peat areas are ignored and discounted.

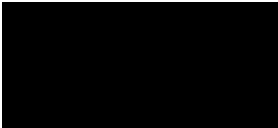
The report concludes, 'a policy that only focuses on, and manages for, parts of an ecosystem without recognising all the essential components and connections of the entire system risks causing harm across the system as a whole if essential supporting structures are allowed to degrade or be lost. Deeper peats almost never end abruptly, but instead grade into shallower peat, then into mineral ground. Given that peatland systems are wetlands and essentially large water bodies held within an organic medium, these margins are vital parts of the interconnected whole in much the same way that one part of a lake is indivisible from the rest of the water body. Where policy retains a focus only on deeper peats, it obscures the view of peatlands as this integrated system. Policy should instead overtly address the fact that peatlands are integrated wetland systems, which cannot be successfully maintained, managed or restored if only parts of the system are acknowledged.'

We note that further detail on construction methods and material is to be provided and we feel this is essential information needed to assess any potential adverse impact on the retained peat soils. Concrete foundations will interact chemically with the peat substrate, not only degrading the peat but also releasing Greenhouse Gases. The specification of the proposed foundations as well as the locations of the turbines will help determine potential adverse impacts on peat restoration attempts. This is especially significant if turbines are positioned upslope of any proposed restoration areas. There is also no discussion on how the installation of the turbines will impact the hydrology of the underlying peat and how this might lead to a draw down effect/drying out of the peat mass. It is essential that the impact on soil chemistry, hydrology and carbon release during construction as well as post construction/operation of the turbines and access roads is fully understood and the relevant data provided.

Outside of peat issues, we note that the scoping study has not included the West Pennine Moors (WPM) SSSI as an issue to be discussed. The nearest section of the WPM to the area of proposed windfarm is approximately 5km away and is immediately across the valley from the mapped search area. The WPM SSSI needs to be included within the scoping assessment.

I hope these comments prove useful. If you have any further queries or require clarification, please do not hesitate to contact me.

Yours sincerely,



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