

REPORT OF THE DIRECTOR

Plan No: 10/16/0704

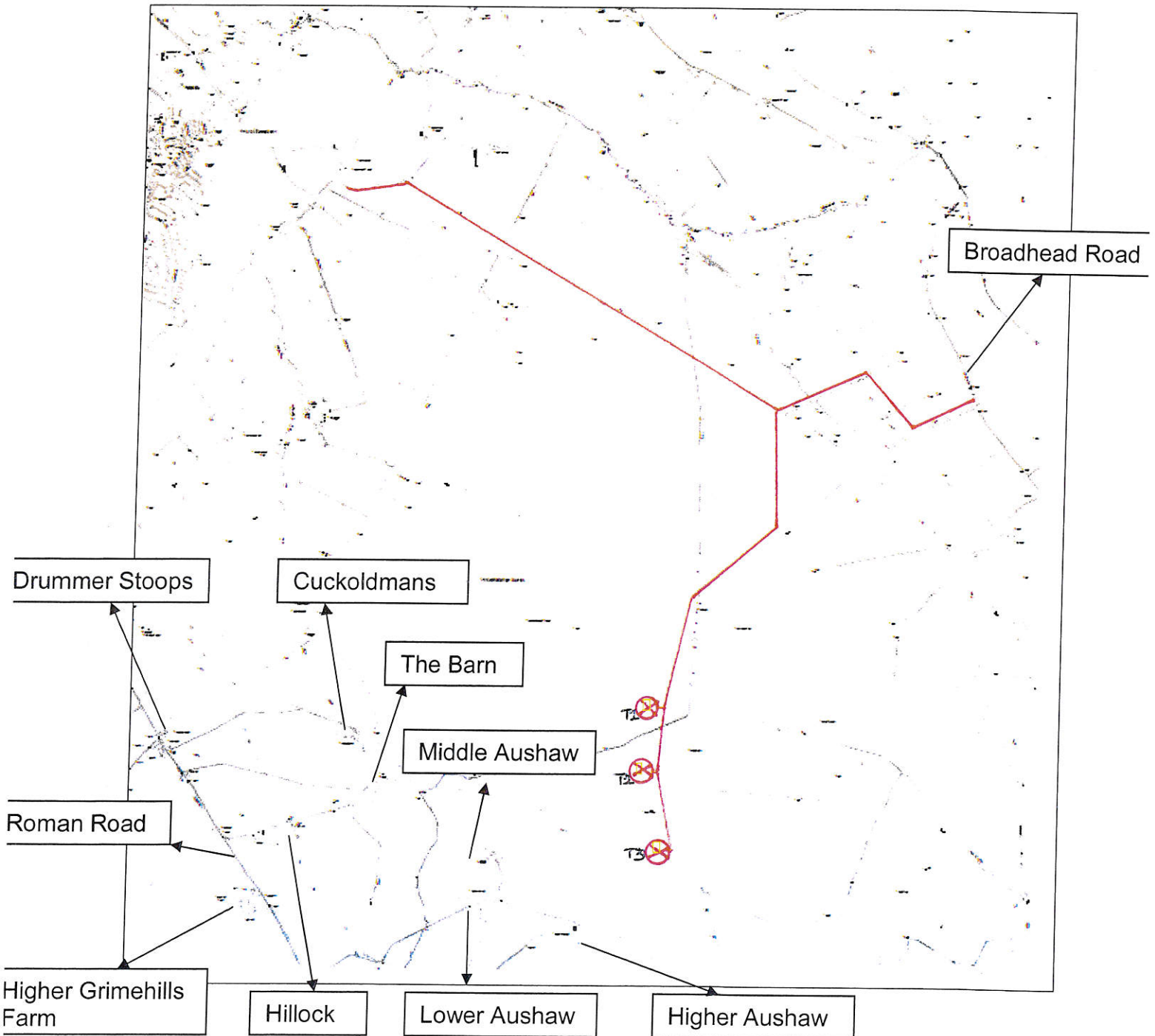
Proposed development: Full Planning Application for installation of 3 wind turbines, hub height of 46m, to tip height 76.5m, to include all ancillary works.

Site address: Hoddlesden Moss, Hoddlesden, Darwen

Applicant: Viridis Wind Turbines

Ward: East Rural, North Turton with Tockholes

Councillor Julie Slater	
Councillor Colin Rigby	
Councillor Jean Rigby	



1.0 SUMMARY OF RECOMMENDATION

1.1 REFUSE – based on four reasons:

1. The proposal would have an unacceptable impact on the ecological and biodiversity interests of the area, including the characteristics identified as of interest in relation to the West Pennine Moors Site of Special Scientific Interest. The proposal does not demonstrate why avoidance of these impacts is not possible; and the proposed habitat enhancement measures do not adequately mitigate, or compensate for, the impacts identified. The harm caused by these impacts is not clearly outweighed by any benefits of the development at the site; nor by any wider benefits of the development. As such, the proposal is contrary to Policies CS13 and CS15 of the Blackburn with Darwen Core Strategy, Policies 5, 9 and 37 of the Blackburn with Darwen Local Plan Part 2 and paragraphs 109 and 118 of the National Planning Policy Framework.
2. The proposed location of Turbine no.3 would have an unacceptable impact on the residential amenity of Higher Aushaw Farm, by reason of harmful visual dominance and an unacceptable level of noise, contrary to Policies 8 and 37 of the Blackburn with Darwen Local Plan Part 2 and paragraphs 17, 109 and 123 of the National Planning Policy Framework.
3. The proposal would have an adverse impact upon the landscape character of the West Pennine Moors and the Countryside Area, introducing industrial and artificial features in a natural landscape; which impacts upon the character of the landscape in this sensitive location. This impact is not outweighed by the benefits of the scheme. As such, the proposal is contrary to Policy CS18 of the Core Strategy, Policies 5, 37 and 41 of the Local Plan Part 2 and paragraphs 17 and 109 of the National Planning Policy Framework.
4. Following consultation, it cannot be demonstrated that the planning impacts identified by affected local communities have been fully addressed, and as such it is clear that the proposal does not have their backing. The proposal therefore conflicts with the position set out in the House of Commons Written Ministerial Statement (HCWS42) - Department for Communities and Local Government Written Statement made by the Secretary of State for Communities and Local Government on 18 Jun 2015. This conflict is not outweighed by the environmental benefits of the development, and as such the proposal is also contrary to Policy 37 of the Blackburn with Darwen Local Plan Part 2.

2.0 KEY ISSUES/SUMMARY OF PLANNING BALANCE

- 2.1 The proposal would, if implemented, be expected to generate 9,268MWh/year of renewable energy, which in broad terms is equivalent to the energy requirements of 2,350 UK homes. The development would also involve the carrying out of works aimed at improving the condition of the peat environment on Hoddlesden Moss.
- 2.2 However, the construction of the turbines and associated infrastructure in this location would bring about significant harm to the peat environment on Hoddlesden Moss, including the characteristics identified as being of interest in relation to the West Pennine Moors Site of Special Scientific Interest. The application does not provide any explicit demonstration of how it has sought to avoid these impacts; the measures proposed in the application do not directly mitigate the impacts; and the proposed improvements to the peat moss (which might be considered as being aimed at compensating for the impacts identified) have either not been demonstrated to be necessary; or are able to be achieved as a result of the SSSI designation without needing to incur the impacts on the peat identified above.
- 2.3 There is also an unacceptable impact on a specific neighbouring property which in itself would warrant refusal of the application.
- 2.4 The proposal also has a material impact upon the landscape character of the West Pennine Moors and the Countryside Area, introducing industrial and artificial features in a natural landscape. This impact is not outweighed by the benefits of the scheme.
- 2.5 In addition the application is clearly not supported by the community local to the application site, and therefore conflicts with local policy and the Written Ministerial Statement.
- 2.6 There is therefore a significant conflict with national policy relating to the SSSI; with Local Plan policy relating to ecology, residential amenity, landscape character and community support for wind energy development; and national guidance and a Written Ministerial Statement concerning the same issue of community support.
- 2.7 The significant harm that is caused by these impacts is clearly not outweighed by the benefits of the development, either at the site or in overall terms.
- 2.8 The overall planning balance is therefore considered to be strongly negative, and Members are recommended to refuse the application.

3.0 RATIONALE

3.1 Site and Surroundings

The site is open moorland on Soot Hill, notified as part of the West Pennine Moors SSSI. It is known as Hoddlesden Moss and sits to the south of Hoddlesden, west of Broadhead Road and east of Roman Road. It is identified as Countryside Area within the Local Plan Part 2. Public Rights of Way intersect the site and the closest residential property is located 330m away.

3.2 Proposed Development

- 3.3 The application proposes full planning permission for the erection of three 900kw wind turbines, which would each have a total height of 76.5 metres

(46m to hub and 61m rotor diameter). They are to be located in a north south arrangement on Hoddlesden Moss, sited at the following locations:

	Wind Turbine 1	Wind Turbine 2	Wind Turbine 3
	OSX 372902	OSX 372873	OSX 372902
	OSY 420727	OSY 420534	OSY 420362
3.4 A	N 53° 40' 56"	N 53° 40' 50"	N 53° 40' 45"
n	W 02° 24' 42"	W 02° 24' 44"	W 02° 24' 42"
C			

- illary works would also include the creation of an access road off Broadhead Road for construction and maintenance purposes, which will be 3.75m wide and approx. 1.6km long (to turbine 3). The wind turbines would each require a foundation and designated hardstanding area for construction purposes, being 15m diameter hard standing for turbine and 15m x 35m for the construction pad. Depth of the foundations is suspected to be around 2.5m, however, this could be more dependent upon topography and peat depths. A transformer station would also be required adjacent to the installation and a cable connection is proposed to run from the turbines northwards into Hoddlesden.
- 3.5 The turbines will be in situ for 25 years, and decommissioned following this time. The turbines would be removed, but the hardstanding and access track would remain permanently.
- 3.6 Anticipated energy generation is 9,268MWh/year, with an installed capacity of 2.7MW; equivalent to powering 2,350 UK homes.
- 3.7 As part of this proposal the applicant proposes a package of works to an area of Hoddlesden Moss comprising:
- Grip blocking and dam installation in the main gully/irrigation pipe removal/bunding – to improve water retention on the blanket bog.
 - Geojute bank stabilisation of exposed peat
 - Purple moor-grass *Molinia caerulea* mulching
 - Sphagnum moss inoculations (measures to promote the growth of peat forming sphagnum mosses)
 - Installation of fire breaks
 - Removal of forested areas (off site)
 - 1.3 ha of woodland replanting is proposed to be included as “compensation” (off site).
- 3.8 Amended and additional information for the scheme was received during the course of the application. The assessment is based upon the original and amended/additional information.

3.9 Development Plan

Core Strategy

CS13 – Environmental Strategy – The environmental effects of development will be weighed against its economic and social effects and the net environmental impact managed, in line with the environmental strategy. Where there is conflict alternative sites which would result in less harm should be considered. Mitigation and compensation will be sought where environmental impacts outweigh benefits. Development will only be permitted where it creates no unacceptable environmental impact.

CS15 – Protection and Enhancement of Ecological Assets – Ecological assets will be protected. Measures will be put in place to secure the protection and enhancement of biodiversity sites and habitats.

CS18 – The Borough's Landscapes – Key features of landscapes will be protected. Proactive management of the upland areas will be supported.

Local Plan Part 2

Policy 5 – Countryside Areas – Planning permission will only be granted for development needed for the purposes of agriculture or forestry or economic uses appropriate in nature and scale to the rural area.

Policy 7 – Sustainable and Viable Development – When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions of the area.

Policy 8 – Development and People – Development will be permitted where it complies with a range of criteria, including contributing positively to the overall physical, social, environmental and economic character of the area in which the development is sited and it would secure a satisfactory level of amenity and safety for surrounding uses and for occupants or users of the development itself, with reference to noise, vibration, odour, light, dust, other pollution or nuisance, privacy / overlooking, and the relationship between buildings.

Policy 9 – Development and the Environment - Development will be permitted where, following implementation of any required mitigation, there is no unacceptable impact on environmental assets or interests, including but not limited to climate change (including flood risk), green infrastructure, habitats, species, water quality and resources, trees, and the efficient use of land. [...] Development likely to damage or destroy habitats or harm species of international or national importance will not be permitted [...]

Policy 10 – Accessibility and Transport - Development will be permitted provided it has been demonstrated that the road safety and the safe, efficient and convenient movement of all highway users (including bus passengers, refuse collection vehicles, the emergency services, cyclists and pedestrians) is not prejudiced; and [...] the development does not directly affect any public right of way, unless the right of way is maintained or the proposal provides for its replacement by an equally attractive, safe and convenient route [...]

Policy 37 – Wind turbines – Will be permitted where it complies with a range of criteria, including visual impact, neighbouring amenity including noise and shadow flicker, protected habitats and features of ecological interest unless the benefits outweigh harm, the degree of harm is minimised by design and residual harm is mitigated or compensated for, impact on local hydrology and interference with telecommunications paths

Policy 41 – Landscape – Development will be permitted where there is no unacceptable impact on landscape character.

Green Infrastructure & Ecological Networks Supplementary Planning Document (SPD)

3.10 **Other key material planning considerations**

National Planning Policy Framework

Paragraph 17 (Core Planning Principles) encourages the use of renewable resources; *paragraphs 97 and 98* of the NPPF relates to increasing the supply of renewable and low carbon energy and state that LPAs should approve applications [unless material considerations indicate otherwise] if impacts are acceptable.

Paragraph 118: [...] proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest [...].

Notified as West Pennine Moors Site of Special Scientific Interest (SSSI) by Natural England in November 2016 [with immediate effect].

The site is allocated as a Biological Heritage Site.

Wind Turbine Development in Blackburn with Darwen – A guide for Developers - This document sets out the overall approach for such developments in the Borough and the material considerations that should be taken into account when assessing such proposals. It provides some interpretation of the previous Local Plan policies.

Lancashire Landscape Character Assessment - an objective description and classification of the Lancashire landscape. It forms the basis for the evaluation and guidance provided in the landscape strategy.

Landscape Sensitivity to Wind Energy Development in Lancashire – provides strategic guidance on the sensitivity of Lancashire's landscapes to wind energy developments. Addresses landscape parameters only and excludes consideration of other issues (e.g. impacts on ecology, hydrological regimes, soil resources, grid connections etc) which also merit careful consideration when seeking to locate wind energy developments.

House of Commons: Written Statement (HCWS42) - Department for Communities and Local Government

Written Statement made by: Secretary of State for Communities and Local Government (Greg Clark) on 18 Jun 2015.

3.11 **Mechanics of the Planning Decision**

As with all planning applications, the overall basis for a decision on this proposal is set by Section 38(6) of the Town and Country Planning Act 1990

(as amended), such that the application should be determined in accordance with the Development Plan (the Core Strategy and Local Plan Part 2) unless material planning considerations indicate otherwise. If there is a conflict with the development plan, this conflict is weighed against any "positive" material considerations in the planning balance.

3.12 In this context, Members are advised of the need to specifically take into account the following points in forming a view on this application.

3.13 *The policy test at the 2nd bullet of paragraph 118 of the National Planning Policy Framework.*

Where an application would cause harm to a Site of Special Scientific Interest (SSSI), as this development would, the decision maker must consider whether this harm is clearly outweighed by the benefits of development at the site. The renewable energy benefits of this development are not benefits that arise at this site. In determining whether there is a conflict with NPPF para 118, Members should not therefore take into account the renewable energy benefits of the development. They are however entitled to consider, if they were first to conclude that there is a conflict with NPPF para 118, whether this conflict is outweighed by the wider benefits of the scheme including the renewable energy generated.

3.14 *The relevance of land ownership.*

The owner of Higher Aushaw Farm (on which Turbine 3 is proposed to be sited), who has also indicated that he owns the land on which Turbine 2 is proposed to be sited, has stated that he will not allow Turbines 2 and 3 to be installed on his land, or any other aspect of the proposed development undertaken. He has invited the Council to consider the application only on the basis of the benefits of Turbine 1. In relation to this issue, Members are advised on two points. Firstly, land ownership is not itself a material planning consideration. Members are therefore asked to set aside the statements made by the landowner in their assessment of the application, and to consider the benefits and impacts of the scheme applied for as a whole. Secondly, and notwithstanding this, Members are advised that in the event that they were minded to approve the application, there would be a number of "pre-commencement" conditions that could not be discharged without detailed on-site surveys being undertaken across the whole application site – which would require the land owner's consent to access the land in question. In practice this would mean that the development, if approved, would either be carried out as a whole, or not at all.

3.15 *The Written Ministerial Statement of July 2015.*

The Written Ministerial Statement (which has subsequently been transposed into the national Planning Practice Guidance - Paragraph: 033 Reference ID: 5-033-150618) indicates that onshore wind energy schemes are not to be approved unless either i) they are on land allocated for this purpose in a Local Plan (there is no such allocation in Blackburn with Darwen's Local Plan), or ii) the planning concerns raised by the local community have been addressed such that it can be taken that the scheme has local support (officers' assessment is that this requirement has not been met). Members are advised that this Statement and the Practice Guidance cannot constitute an outright moratorium on development that does not meet the criteria set out, and are instead material considerations that are capable of being weighed in the planning balance alongside all others. Members are also advised however,

that as an up to date expression of government policy, the Statement and the Practice Guidance should attract significant weight in the planning balance.

3.16 *Environmental Impact Assessment (EIA) Screening.*

The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 as amended (the "EIA Regulations") require certain developments to be subjected to an Environmental Impact Assessment or EIA. These regulations apply the EU directive "on the assessment of the effects of certain public and private projects on the environment" (usually referred to as the Environmental Impact Assessment Directive) to the planning system in England.

3.17 The EIA Regulations set out a framework for "screening" projects in order to determine which ones require EIA. "Screening" is a procedure used to determine whether a proposed project is likely to have significant effects on the environment. It should normally take place at an early stage in the design of the project. However, it can also occur after a planning application has been made or even after an appeal has been made. In general terms the screening process looks at the likely environmental impact of a project by reference to the type and size of the project, and the sensitivity of the location in which it is proposed. The Council has a role in providing written "screening opinions" in relation to projects proposed in Blackburn with Darwen.

3.18 Members will be aware that an application for a development very similar to the current proposal was submitted to the Council in 2012. That application was screened in accordance with the EIA Regulations, and an opinion issued that EIA was not required.

3.19 When the current planning application was submitted in June 2016, there had been no significant change to the nature of the development, and no change to the status of the area it was proposed to be constructed on, and so the 2012 determination that EIA was not required remained applicable.

3.20 During the assessment of the application, however, the West Pennine Moors have been notified as a Site of Special Scientific Interest. This represents an increase in the sensitivity of the application site.

3.21 Members are advised that the proposal would have significant effects on what is now deemed a sensitive location, and would therefore, if submitted now, require an Environmental Impact Assessment. However, given that the application had been submitted and accepted as valid without an EIA at a point where the SSSI had not been notified, it is necessary to advise Members as to how to deal with the application on this point.

3.22 Natural England provided a comment on this issue in their updated consultation response following notification of the SSSI as follows: "*the local planning authority might refer to the indicative thresholds and conclude that EIA is not necessary on that basis. They might also conclude that whilst it is in a sensitive location and the effects are significant, that an EIA is not required because the aims of EIA have already been met through the planning process i.e. assessment of impacts and consultation.*"

3.23 Members are advised that it is not possible to "invalidate" the application on the basis that it would now require an EIA. They are also advised that by the point at which the SSSI was notified, the application had been subject to extensive assessment by the Council, consultation with statutory bodies and local communities, and discussion with the applicant. As such, the issues which an EIA would have addressed had already begun to be considered, in

an open forum, in a high level of detail. To have halted consideration of the planning application and required a formal EIA process would have i) led to confusion on the part of communities and consultees as to the process of determining the application, and ii) added little or nothing to the assessment or the outcome. In this unique combination of circumstances, Members are advised that the most reasonable way to address the issues is to proceed to determine the current planning application without requiring a separate EIA.

3.24 **Assessment**

The key issues in relation to this application are:

- Principle;
- Ecology and biodiversity;
- Hydrology;
- Residential amenity, including visual impact, shadow flicker and noise;
- Landscape Impact;
- Community backing; and
- Highways.

3.25 The proposal will involve significant ground and infrastructure works to facilitate the construction and access to the turbines. The excavation required for the hardstanding of the turbine bases and construction pads amounts to some 2,100 square metres of area. The foundations must be built onto solid ground and as such, given a typical peat depth of at least 2.5 metres, this would involve the excavation of at least 5,250 cubic metres of land (predominantly peat). Furthermore, the access track from Broadhead Road to the site will be around 1.6 km long, being 3.75 metres wide, constructed using a "floating road" technique. In addition, a cable is to be inserted into the ground which will feed the energy into the National Grid – running from all turbines to the connection point in Hoddlesden.

3.26 Principle

Wind turbine development is generally supported by the Council's planning policy framework, indeed Policy CS13 of the Core Strategy and Policy 37 of the Local Plan Part 2 (along with NPPF paragraphs 17, 97-98) promote the development of renewable energy; providing that the environmental benefits of the renewable energy generation potentially realisable through the development outweigh any harm caused.

3.27 Members are advised that there is nothing in the area's Site of Special Scientific Interest designation that represents an outright "ban" on wind energy development; though the designation introduces clear policy tests that must be met or addressed.

3.28 The principle of the development is therefore acceptable – but Members are advised that given the policy framework this would almost always be the case; and that the determination of this application should be made based on the benefits and impacts of the specific scheme.

3.29 Ecology and biodiversity

The site has been notified as a Site of Special Scientific Interest (SSSI) by Natural England. As such, paragraph 118 of the NPPF is particularly relevant which states that:

"When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- *if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- *proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest;*
- *[...] planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss; [...]"*

3.30 The notified features of the West Pennine Moors SSSI are:

- i. Blanket bog
- ii. Upland heathland
- iii. Flushes
- iv. Moorland fringe grasslands
- v. Woodland
- vi. Breeding birds
- vii. Flowering plants.

3.31 Paragraph 118 of NPPF (bullet point 1) is clear that Local Planning Authorities should follow a hierarchy of consideration, i.e. if significant harm resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.

3.32 It is considered that, in consultation with Natural England and the Council's ecological advice specialist that the proposals have not properly considered the hierarchy of considerations. This would include consideration of alternative locations ("avoid"), the scope to fully mitigate impacts, and the need for off-site compensation for loss of notified habitat.

3.33 "Avoid"

The application contains very limited information on why this site has been chosen, and none on how environmental factors have influenced the site selection process.

3.34 "Mitigate"

The application fails to define the impact of the development in the level of detail that would be expected in order to allow a fully detailed mitigation scheme to be designed. As a consequence the application does not propose a mitigation scheme that addresses in detail the specific impacts that will occur. Nevertheless, a number of impacts can clearly be identified, including the removal and translocation of peat, changes to patterns of drainage in the peat, and risks that are created to the stability of the body of the peat. The

measures proposed to the peatland are not specific enough in nature, and do not relate sufficiently directly to the identified impacts, to be properly considered mitigation. Natural England has commented that it would be “very challenging” to successfully mitigate the impacts of this scheme at this location.

3.35 “Compensate”

Paragraph 118 of NPPF (bullet point 2) details that proposed development on land within a SSSI likely to have an adverse effect should not normally be permitted. It specifies that where an adverse effect on the site’s notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest.

3.36 Given the scale of engineering works involved, it is considered that this application will cause irreparable damage to the blanket bog habitat notified feature (both the peat profile and extent) in the excavation of peat for the wind turbine pads, hardstanding, the access tracks and route for the cable. Blanket bog is a limited and finite resource. The proposed development would therefore result in loss of and impacts on blanket bog, an Annex 1 Priority Habitat of European importance and notified interest feature of this SSSI.

3.37 Additionally, the development is likely to have significant impacts on the breeding bird assemblage, with the risk that the breeding birds feature would be disturbed and affected both during the construction works, if undertaken during the breeding and nesting season (although this element could be dealt with by a condition), and permanently during operation (which could not be dealt with by a condition). Furthermore, concerns have been raised by Natural England, Capita Ecology, the RSPB, Lancashire Wildlife Trust and others that the submission documents relating to breeding bird surveys and bat surveys were not carried out to the accepted methodology. This could have resulted in under-recording of birds/bats and subsequently not have provided a full picture of the use or importance of the site for bird species during the peak breeding season or the evidence of bats.

3.38 As such, the Council must consider if the works proposed can be considered as an exception whereby the benefits of the development, at the site, clearly outweigh the impacts that it is likely to have on the features of the site that make it of special scientific interest. The benefits of the development at the site are:

- Grip blocking and dam installation in the main gully/irrigation pipe removal/bunding – to improve water retention on the blanket bog. It is noted that these locations are unspecified.
- Geojute bank stabilisation of exposed peat
- Purple moor-grass *Molinia caerulea* mulching
- Sphagnum moss inoculations
- Installation of fire breaks

3.39 The renewable energy benefits of the development are not a benefit realised at the site; they are wider benefits that could be realised elsewhere and are not site specific to this development. The same is true of the scheme (which does not form part of the development covered by this application, but which the applicant has committed to undertake in the event that permission is

granted) to remove an area of non-native trees in another location on Hoddlesden Moss and to plant an area of trees on land near Broadhead Road.

- 3.40 The applicant has submitted documents which suggest that the site is not an active blanket bog. It is acknowledged that the site may not currently be an active peat forming bog; however, it has sufficient peat depth and bog indicator species that with appropriate management it could be brought back into a more favourable condition and potentially as an active peat forming bog in time. In this regard, Natural England has advised that large-scale enhancement on the area is not required and would be unlikely to be beneficial to the overall condition of the site. Moreover, the proposed enhancement could have a further negative impact through effects on hydrology and damage to the bog. The notification of the West Pennine Moors as a SSSI provides the best possible mechanism for the Hoddlesden Moss site to recover and achieve a favourable condition status through sensitive management on the site in conjunction with owners and occupiers. It creates opportunities, including funding, for improvement schemes to be delivered without the need to allow development (with its attendant impacts) as a means of securing them.
- 3.41 The site is considered to be an irreplaceable habitat that takes tens of thousands of years to be created naturally. No avoidance methods have been detailed, the mitigation proposed is not sufficient and there are no benefits at the site that outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest, or the significant harm to an Annex 1 Priority Habitat of European Importance identified under the Habitats Directive and a Habitat of Principal Importance as identified under the NERC Act 2006.
- 3.42 No broader impacts on the national network of Sites of Special Scientific Interest have been identified as arising from this development.
- 3.43 To conclude, it is considered that the proposal fails to comply with paragraph 118 of NPPF, along with Policies CS13 and CS15 of the Core Strategy and Policies 9 and 37 of Local Plan Part 2.
- 3.44 Hydrology
The proposal has the potential to impact upon hydrology, with specific reference to public and private waters supplies. Paragraph 162 of NPPF details that Local Planning Authorities should work with other authorities and providers to assess the quality and capacity of [...] water supply [...]
- 3.45 The proposal received objection from United Utilities on the first consultation, however, this objection has now been withdrawn and been replaced with 8no. proposed conditions relating to both public and private water supply.
- 3.46 It is observed that these conditions may require a substantial investment from the applicant to comply with, but are technically capable of controlling this matter satisfactorily.
- 3.47 Residential Amenity
The location of turbine no. 3 (the southernmost turbine) is located approximately 330 metres away from the residential property, Higher Aushaw Farm. The application was initially formulated on the basis that the landowner wished the development to proceed, and therefore would have been willing to

accept a relationship between the development and his house which would ordinarily have been contrary to policy. (This situation is similar to a domestic extension, where an extension that for example fails the "45-degree rule", in relation to a window on the house being extended, would still be considered acceptable). However during the consideration of the application, notification was received that the ownership of Higher Aushaw Farm had changed and the new owner strongly objected to the proposal. As such, an assessment upon the amenity of this dwelling must be fully appraised, along with the impact of the development upon other nearby neighbours.

- 3.48 The Wind Turbine Developer's Guide advocates that where a turbine is between 71-85 metres in height, the minimum separation distance between the turbine and the residential property should be 490 metres. Whilst the document is not adopted planning guidance, it does provide helpful assistance in assessing impact, and is consistent with standards applied by other local planning authorities.
- 3.49 It is considered that the location of turbine 3 and its resultant height and massing would have a harmful and detrimental impact upon the residential amenity of Higher Aushaw Farm. The siting is 160m less than the minimum separation distance detailed in the wind turbine developers guide and this impact would result in visual dominance to the extent that the scheme would have an unacceptable adverse impact on the amenity of neighbouring occupiers.
- 3.50 Furthermore, the impact of noise upon the neighbouring property has identified that there would be an unacceptable adverse impact at wind speeds less than 6m/s. A noise condition could theoretically be devised which prevents the operation of the turbine at wind speeds below 6 m/s and imposes noise limits at higher wind speeds, along with mechanisms for assessing whether these limits have been breached. However, such a condition would i) impose a significant resource demand on the operator, ii) require significant resource from the Council to assess alleged breaches and iii) leave a significant degree of uncertainty for neighbours as to whether a breach had occurred at a given point in time. It is therefore considered by officers that such a condition, relating to only one turbine, may be unreasonable and fail to comply with paragraph 206 of the NPPF, which details the requirements for planning conditions.
- 3.51 It has been considered, and advised by Public Protection, that shadow flicker can be managed through a condition that will require shut down of the turbines where shadow flicker could occur. As such, the impact of the development in terms of shadow flicker would be adequately mitigated by an appropriately worded condition.
- 3.52 Whilst there has been some concern expressed regarding the size of the proposed wind turbines and the fact that it would somewhat interrupt the outlook upon other neighbouring properties, it would not be so harmful in this regard to create an overbearing impact that would harm their amenity to a degree that would warrant refusal on these grounds.
- 3.53 To conclude, the proposal would have an unacceptable impact upon the residential amenity of Higher Aushaw Farm, contrary to Policies 8 and 37 of the Local Plan Part 2.
- 3.54 Landscape Impact

The Lancashire Landscape Character Assessment identified this area as "Moorland Hills" and the subsequent study by Lovejoy (2005) on landscape sensitivity to wind energy development highlighted that the area had a medium-high sensitivity to wind energy development. This evidence gives the basis for determining the degree of protection to be afforded under Policy CS18: the "quality, importance and uniqueness" of the landscape in question can be equated to its sensitivity to turbine development, in addition to policies 5, 9, 37 and 41 of the Local Plan Part 2.

- 3.55 It is of little doubt that in spite of the submission of extensive documentation regarding landscape impact, that the proposed development of 3 turbines on this highly prominent and visible site would result in an intrusive development in the West Pennine Moors; and due to the open landscape character of the area would be highly visible from several locations across the Borough. Indeed, this harmful impact constituted a clear reason for refusal of a previous development of a single wind turbine under planning reference 10/12/0318, and the three wind turbines in the same location (planning ref 10/14/1117) as set out in 5.0.
- 3.56 It is still considered that the current proposal would create an adverse visual impact forming an industrial and artificial feature in a natural landscape with few man-made features to break up views, undermining the character of the landscape in this sensitive location.
- 3.57 These identified landscape impacts are capable of being weighed in the planning balance against any identified benefits of the development. However, officers' assessment is that the degree of harm to landscape character is not outweighed by the benefits; and therefore the development is contrary to Policy CS18 of the Core Strategy and policies 5, 37 and 41 of the Local Plan Part 2.
- 3.58 Community Backing
Policy 37 of the Local Plan Part 2 details that "wind turbine development will be permitted, where [...] following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing." This is based on The Written Ministerial Statement HCWS42 published in June 2015 and subsequently incorporated in the national Planning Practice Guidance.
- 3.59 In terms of neighbouring letters of objection and support, a significant proportion of objection letters have been received from the surrounding local community, i.e. people living in Hoddlesden and the dwellings surrounding the site. Officers have produced a map of the location of objection and support letters received from within the borough, to detail this in a graphic format. A summary of objections received is set out in 6.1, along with the map.
- 3.60 The applicant has submitted an addendum report to detail the community engagement that has been carried out in Hoddlesden, along with submitting details of the community benefits scheme, which would provide monies to local facilities.
- 3.61 In consideration of the objections received, and taking into account the applicant's submission details, it is recommended that the planning impacts identified by the affected local communities have not been fully addressed. This relate to, amongst others, the adverse landscape and visual impact and the adverse impact upon ecology, biodiversity and the West Pennine Moors

SSSI. Therefore, it is considered that the proposal does not have the backing of the local community and would fail to comply with Policy 37 of the Local Plan Part 2 and the Written Ministerial Statement HCWS42.

3.62 Highways

Policy 10 of the Local Plan Part 2 requires that the proposal will demonstrate that the road safety and the safe, efficient and convenient movement of all highway users are not prejudiced.

3.63 Supporting information received has concluded that the proposal would not have a harmful impact upon highway safety. Highways have advised that there are a number of issues that still require further consideration, however, these could be sufficiently conditioned and are not sufficiently insurmountable to warrant a recommendation for refusal.

3.64 Other matters

Objection from the National Air Traffic Control has been received. Correspondence with NATS detailed that *"the applicant was offered mitigation in 2014 but at this time was unwilling to commit, as an agreed mitigation can block potential mitigation for neighbouring developments the Hoddlesden offer was withdrawn after 30 days. No neighbouring developments have emerged in the interim that would preclude us re-offering mitigation for Hoddlesden however our internal governance requires us to re-approve the mitigation with the various users of the radar which we will endeavour to do as quickly as practical."* This issue is not considered to warrant refusal of the application.

3.65 Comments from Lancashire Fire & Rescue Service have advised that sites incorporating wind turbines installations are subject to a robust risk assessment that should consider the means to mitigate the structure becoming involved in fire should a wildfire occur in their proximity. There is also a requirement should the structure itself become primarily involved in fire that adequate mitigation is taken to prevent that fire spreading to open land and causing a wildfire in that vicinity.

3.66 It is considered that a condition requiring a prevention strategy would be necessary, should the application be approved. This would also include proportional consideration to access for emergency services.

3.67 Conclusion

The overall planning balance advocated for this application comprises the following:

- There is a clear and direct conflict with the second bullet of para 118 of the National Planning Policy Framework, and therefore also with Policy 37 of the Local Plan Part 2.
- There is a significant impact on a neighbouring property (Higher Aushaw Farm) to an extent that would in itself warrant refusal.
- There is an adverse impact upon landscape character.
- There is a conflict with the Written Ministerial Statement and therefore with Policy 37 of Local Plan Part 2 in relation to community support for the proposal.
- The benefits of the development at the site, as required by NPPF para 118; do not clearly outweigh the impacts, and could be achieved through funding opportunities attached to the SSSI designation without

needing to allow the development – and should therefore be afforded less weight in the planning balance.

- The wider benefits of the development are noted but are not considered to outweigh the impacts.

The planning balance in terms of the benefits against impacts is therefore considered to fall very clearly in favour of a refusal of the application, which does not constitute sustainable development.

4.0 RECOMMENDATION

4.1 REFUSE:

4.2 Reasons:

1. The proposal would have an unacceptable impact on the ecological and biodiversity interests of the area, including the characteristics identified as of interest in relation to the West Pennine Moors Site of Special Scientific Interest. The proposal does not demonstrate why avoidance of these impacts is not possible; and the proposed habitat enhancement measures do not adequately mitigate, or compensate for, the impacts identified. The harm caused by these impacts is not clearly outweighed by any benefits of the development at the site; nor by any wider benefits of the development. As such, the proposal is contrary to Policies CS13 and CS15 of the Blackburn with Darwen Core Strategy, Policies 5, 9 and 37 of the Blackburn with Darwen Local Plan Part 2 and paragraphs 109 and 118 of National Planning Policy Framework.
2. The proposed location of Turbine no.3 would have an unacceptable impact on the residential amenity of Higher Aushaw Farm, by reason of harmful visual dominance and an unacceptable level of noise, contrary to Policies 8 and 37 of the Blackburn with Darwen Local Plan Part 2 and paragraphs 17, 109 and 123 of National Planning Policy Framework.
3. The proposal would have an adverse impact upon the landscape character of the West Pennine Moors and the Countryside Area, introducing industrial and artificial features in a natural landscape; which impacts upon the character of the landscape in this sensitive location. This impact is not outweighed by the benefits of the scheme. As such, the proposal is contrary to Policy CS18 of the Core Strategy, Policies 5, 37 and 41 of the Local Plan Part 2 and paragraphs 17 and 109 National Planning Policy Framework.
4. Following consultation, it cannot be demonstrated that the planning impacts identified by affected local communities have been fully addressed, and as such it is clear that the proposal does not have their backing. The proposal therefore conflicts with the position set out in the House of Commons Written Ministerial Statement (HCWS42) - Department for Communities and Local Government Written Statement made by: Secretary of State for Communities and Local Government (Greg Clark) on 18 Jun 2015. This conflict is not outweighed by the environmental benefits of the development, and as such the development also fails to comply with Policy 37 of the Blackburn with Darwen Local Plan Part 2.

5.0 PLANNING HISTORY

5.1 10/12/0318 – Proposal for installation of a 500 kw Wind Turbine including all ancillary works at Lower Aushaw Farm, Roman Road, Eccleshill, Darwen, BB3 3PP refused under delegated powers in June 2012 for the following reasons:

1	The proposed development, by virtue of its siting and scale, would introduce a highly prominent feature to the detriment of the landscape and visual character of this area of the West Pennine Moors which is also a designated Countryside Area. As such the proposal is contrary to the provisions of Saved Policies ENV8, RA6, LNC1 and LNC3 of the Blackburn with Darwen Local Plan, Policy CS18 of the Core Strategy and advice contained in the National Planning Policy Framework.
2	The proposal fails to thoroughly and adequately evaluate the impact of the proposed development on biodiversity, including non-statutory designated sites, Habitat of Principal Importance / Annex I (Habitats Directive) habitats, peat and hydrology, and ornithological interests and, as such is contrary to the provisions of saved Policies LNC6 and LNC9 of the Blackburn with Darwen Local Plan, Policy CS15 of the Core Strategy and advice contained in the National Planning Policy Framework.
3	The proposal fails to provide adequate information to allow a detailed assessment to be made with respect to the impact of the proposed development on the efficient, convenient and safe movement of all highways users and as such is contrary to the provisions of saved Policy T9 of the Blackburn with Darwen Local Plan.

5.2 10/13/0829 – Proposal for installation of 3 wind turbines on this site was withdrawn by Viridis due to there being a requirement for further information to fully assess impacts.

5.3 10/14/1117 – Installation of 3 wind turbines, hub height of 50 metres, 'to tip' height 74 metres, to include all ancillary works. The application was refused for the following reasons:

1	The proposal fails to demonstrate that the impact of the development on the landscape character and functioning of the West Pennine Moors and the Countryside Area would be satisfactorily mitigated or compensated and, as such, it is contrary to the provisions of Saved Policies LNC1, LNC3, ENV9 and RA6 of the Blackburn with Darwen Local Plan, Policy CS18 of the Core Strategy, Policies 5, 37 and 41 of the emerging Local Plan Part 2 and National Planning Policy Framework.
2	The proposal fails to demonstrate the full extent of the impacts of the development on the ecological, hydrological and biodiversity interests of the area, including impacts on the Hoddlesden Moss Biological Heritage Site, Edgerton Moss Biological Heritage Site, protected species including wintering birds and breeding/nesting birds, European Protected Species Bats, Habitats and Species of Principal Importance and Irreplaceable Habitats (Peatland) and hydrology and fails to demonstrate that such impact would be mitigated to adequately compensate for the loss of habitats and damage to peat. The

	submission also fails to demonstrate that the proposed compensation and mitigation measures themselves will not harm ecological impacts on biodiversity. As such the proposal is contrary to saved policies ENV9, LNC3, LNC6, LNC8 and LNC9 of the Blackburn with Darwen Local Plan, Policies CS13, CS15 and CS18 of the Core Strategy, Policies 5, 37 and 41 of the emerging Local Plan Part 2 and National Planning Policy Framework.
3	The proposal fails to demonstrate that the development will not be detrimental to the safe, efficient and convenient movement of highways users. As such it is contrary to the provisions of saved Policy T9 of the Blackburn with Darwen Local Plan.

6.0 CONSULTATIONS

6.1 Public Consultation:

- 36 neighbouring properties have been consulted by letter, along with the erection of several site notices and a press notice, on both the original scheme and following receipt of additional information on 13 February. At the time of writing this report, 904 letters of objection and 556 letters of support have been logged. It must be noted that some of these letters (both objection and support) could have been logged more than once as there have been duplicate copies submitted.
- There is also an ongoing online petition against the proposal which has over 300 signatures.
- All ward Councillors (both East Rural and North Turton with Tockholes) have also objected. Refer to appendix 2
- The land owner of turbines 2 and 3 objects to the proposal.

Appendix 1 of this report contains a selection of objection and support letters received. The following is a summary of the public comments received:

Object:	Support:
- Adverse landscape and character impact (industrialisation of the area)	- Produce clean, affordable, renewable energy
-- Adverse visual impact	- Offset carbon emissions
- Cumulative impact	- Invest in local communities
- Adverse ecological impact – including birds, bats, badgers, flora and fauna.	- Wind farms are more environmentally friendly than “fracking” or nuclear
- Loss of habitat	- Wind is “never ending”
- Loss of wildlife	- Won't be as visually intrusive as others within the area
- SSSI status	- Onshore wind is cheaper than alternatives
- Shadow flicker impact	- Benefit local economy both during construction and operation of the site through directly employing locals and the supply chain
- Adverse impact to deep peat/active bog	- Help to reduce this reliance on overseas energy
- Carbon sequestration from developing on deep peat	- The UK has committed to reduce carbon emissions
- Adverse impact upon residential amenity	
- Adverse hydrological impact (private water supplies/wells)	
- Adverse impact upon drainage	
- Adverse noise impact	

<ul style="list-style-type: none"> - Adverse geological impact - Lack of community support - Lack of community consultation - Adverse highway safety impact during construction - Adverse visual impact of the access track - Access track unsuitable for construction traffic - Potential flood risk from excavations - Carbon payback time - Adverse impact towards tourism, leisure and recreation on site, i.e. walkers, horse riders, bird watchers - Adverse impact upon heritage and conservation areas of Hoddlesden - Loss of heritage from developing on old coal mine - Adverse impact upon Public Rights of Way - Adverse impact upon livestock - Reduction of property values - Distraction for drivers - Lack of any economic value for the local economy - Inconsistent wind - Wind turbines are ineffective - Potential for more turbines - No need for turbines - Already other wind farms nearby - Attempt to use government subsidies - Never pay for themselves due to the high start-up costs - Errors in the reports/timings in the reports - Planning permission previously refused 	<ul style="list-style-type: none"> - Opportunity to enhance the peat bog - Walkers can enjoy therapeutic nature of turbines. - Generate enough energy to supply 1,500 homes - Wind farm is not a threat to birds or wildlife - Close to existing wind farms - No global warming potential - Proven resource - Cheaper electricity in the future - No negative visual impact - No use of chemicals or radioactive waste
---	--

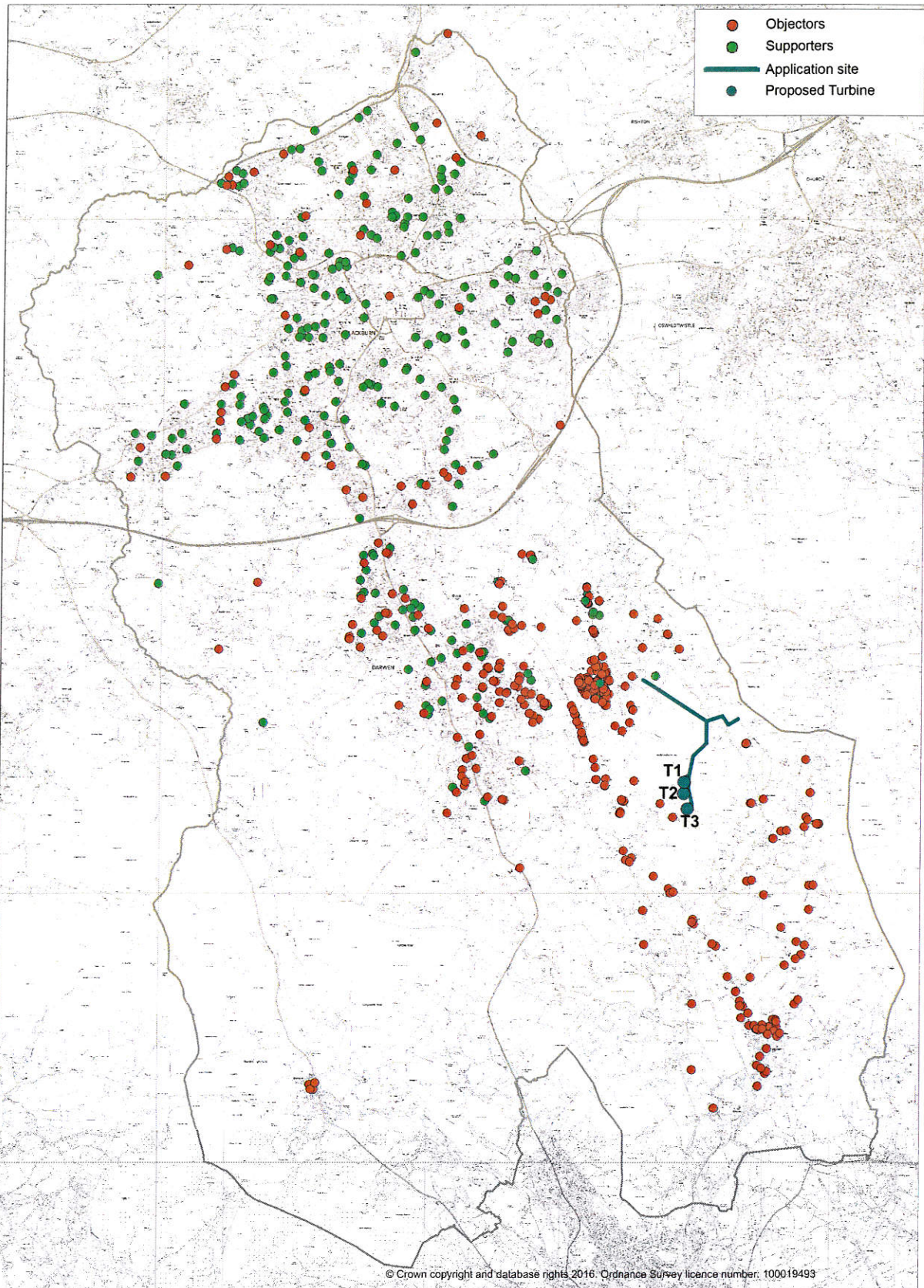
6.2 Statutory Consultations

A suite of the consultation responses and re-consultation responses is contained in Appendices 3 and 4 of this report.

7.0 CONTACT OFFICER: Kate McDonald, Planning Team Leader

8.0 DATE PREPARED: 13 April 2017

APPENDIX 1
**SELECTION OF PUBLIC RESPONSES
RECEIVED**



PLANNING APPLICATION 10/16/0704 - PROPOSED WIND FARM AT HODDLESDEN MOSS:
MAP SHOWING OBJECTORS AND SUPPORTERS

Dr Adam & Mrs Louise Nulty
Higher Aushaw Farm
Roman Road
Hoddlesden
Darwen
BB3 3PP

25th October 2016

Brian Bailey - Director of Planning and Prosperity
&
Kate MacDonald - Planning Officer
Town Hall
Blackburn
BB11 7DY

Dear Sir & Madam,

RE Planning Application Reference: 10/16/0704

Installation of Three Wind Turbines, Access and Infrastructure at Hoddlesden Moss

STRONG OBJECTION (AS LAND OWNERS OF ONE OF THE TURBINES LAND)

We are writing further to our previous written objection sent via email to Kate Macdonald and after we have had a great deal of time to consider and be open minded to the wind turbine project that is to **strongly object** to the above application as we live in THE nearest property to the proposed installation and will be most severely affected by the installation.

As the new owners of Higher Aushaw Farm and the associated land that the closest turbine would sit on, after gathering all of the available evidence (much as I would assume that you have done) we are very worried that this planning application will go ahead and affect the lives, health and mental state of both ourselves and also our two young children of 4 and 1. Our conclusion is based on the fact that there are inconsistencies in the application and what has been told to us by the applicant and also the facts present such as distances. As such we plan on not only stopping the placement of the turbine on our land but also should planning permission be granted we would see this as a grave error and plan on challenging any such permission as far as possible on social media, news and if required the high court of appeal. We say this as respectfully as possible and this may seem as an extreme viewpoint when as land owners we would stand to benefit financially but as the only land owners that would be affected by the application and not living a distance away we see our position as a realistic and unbiased one. I plan to lay out in this letter the argument for refusing this application and any similar to be proposed on this site.

Ordinarily we wouldn't mind the renewable aspect of wind turbines on other sites when chosen correctly and we would prefer the country as a whole to be better adapted to an environmentally beneficial position but this must not come at a cost to the environment and certainly not at a cost to the local community and residents. The wind turbines are unacceptably close to our property.

This is confirmed by Blackburn with Darwen's very own planning document "Wind Turbine Development in Blackburn with Darwen - A Guide for Developers May 2013";

1) Relationship to Residential Properties

Saved Policy ENV9: "no unacceptable adverse impact on the amenity of neighbouring occupiers"

The minimum acceptable distance to a property with a wind turbine of 77m is 490m. The distance of the proposed wind turbine is under 330m to our house and the other turbines are less than 200m to our land. We are therefore rightly concerned with the health and well being impacts on our family including two small children of 4 and 1 of noise and shadow flicker as well as any animals and livestock we plan to put on the land.

2) The Expected Benefits of the Proposal

National Planning Policy Framework Paragraph 98: "When determining planning applications, local planning authorities should: • not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions"

From our reading and research it appears that the CO2 release from the disturbance of the peat bogs will by far greatly outweigh the benefit of the wind turbines in their lifetime.

As we plan to stop the installation of the nearest wind turbine as we own this land then paragraph 2.13 would also be of concern as the benefit of only two wind turbines energy production in the area compared to three can therefore majorly affect the balance of the impact on the landscape and peat vs the potential renewable energy gain.

3) 3 Community Involvement

3.1 Applicants for planning permission for wind turbine development, particularly "commercial" development which will supply power to the National Grid, are encouraged to make early contact with the communities likely to be affected. The Council can assist with this via its Neighbourhood Managers; and applicants should also consider early contact with ward members to explore issues.

As far as we are aware the person planning this scheme Matt Jackson has made no attempt to consult on the previous land owner save a fly by night call in to the property to talk over in advance of the first proposal. There was certainly no consultation on this most recent re-application and if Viridis is claiming to have land owner consent and being false in this claim, this should be of concern to both the planning authority and the land owners with regards to future promises and claims. It is even more concerning that I have had to personally request applicable information from Viridis' Matt Jackson.

4) There has been a great demand from notable local and national bodies such as the local parish council and as far reaching as the RSPB criticising and Objecting to the planning application with genuine and scientific concerns. Whilst there are clear benefits to renewable energy, this site is not the way forward to achieve renewable goals and as land owners we would never want to be in the position of approving a scheme that has such strong criticism and we would suggest the council have the same stance.

5)The original application was turned down as "The proposal fails to demonstrate the full extent of the impacts of the development on the ecological, hydrological and biodiversity interests of the area"

Contrary to what the newest application would have the planning office believe i don't think this position has changed. As a third party I would expect that since the two bodies that would normally approve of a renewable scheme, the RSPB and government itself seem to be strongly objecting to the idea of this site as the site should become an area of special scientific interest as they believe that this development would not be in the best interest of the ecological, hydrological and biodiversity interests of the area. All of the farms of the area, including ours also obtain water from this site via our own wells, we are seriously concerned that this development would poison these wells and impact on the health of my family and those of the families of the surrounding farms.

6) If the council believes that a renewable source is required on this site, may I suggest that if this is of primary concern then a better alternative would be a solar farm that would have much less impact with all of the above factors and in fact with current technologies may actually produce the same amount of power for the area. However this is just a suggestion for the wind turbine closest to us on our land as no other alternative and we would rather our land be used as farming land as per its current use.

I have been advised by the planning team that our objection as land owners does in fact change whether the planning should be accepted if it would not be viable if only 2 turbines were installed or whether to advise Mr Jackson of Viridis to move the turbine off our land and reapply as it would be a good renewable resource for the area. I feel that this is wholly inappropriate as Matt Jackson now feels that the planning application is his to tailor as he sees fit with the consent of the planning team.

We met with Matt Jackson of Viridis to see if he could make us feel better about our concerns. We requested to meet him at the site of the turbine he has so far installed in Rochdale near the reservoir of the same spec. We stood under the behemoth and also stood 330m away to see and hear the effects that this would have on our house. We then drove to 490m away from the turbine as per the documented minimum residential distance as advised by your council. The important points we found were;

1) At around 500m we could still faintly hear the turbines but at less than this distance there was a definite high pitched noise that was present and the closer you got the more this became easily apparent and more than an annoyance and something that I would be concerned at causing long term health effects both mentally and in hearing. This tells me that your councils advising document that 490m is a minimum distance is actually correct and that closer should be very seriously discouraged. In fact after personally visiting these turbines, we feel that even 500m isn't enough as you have to travel a few hundred metres more to not hear them at all. We shouldn't have to put up with these health concerns in this day and age when medical and research driven medicine has shown these to be valid concerns.

2) The distance proposed to our house (please see; http://planning.blackburn.gov.uk/northgate/documentexplorer/application/stream.aspx?target=http%3A%2F%2F10.200.18.171%2FNorthgate%2FDocumentExplorer%2FDocumentStream%2FDocumentStream.aspx%3Fname%3D%255bpublic%255d%2B16_0704%2BAppendix%2B14%2BLVIA%2BReport.pdf%26unique%3D50174%26type%3DPLNP11_DC_PLANAPP)

The document from Viridis on your planning site entitled "Landscape and Visual Assessment" Introduction 1.3;

"There is residential occupation in the vicinity of the proposed development with the closest residential dwelling associated with Higher Aushaw, approximately 455m away. "

This figure has been used throughout the application.

HOWEVER. Using the location map OS points and measuring the distance accurately with satellite map software between the coordinates of our house is actually around 330m. This is confirmed later in this letter with documentation provided by viridis.

In fact, only one turbine of the three is over 490m away.

This is even proved in the other documents Viridis has provided with red marker diameter circles showing distances and also the photo viewpoint 5 from Soot hill which is in fact a greater distance on the map to the third turbine that the turbine is to our house and yet it is noted as 370m away.

In relation to this perceived sensitivity (as established within the study 'Landscape Sensitivity to Wind Energy Development in Lancashire'), the only significant effect arising from the proposed development is in relation to a single location, this being photoviewpoint 5 on Soot Hill. It should be noted that this is within 370m of the closest wind energy converter. At this close proximity, the wind turbines would add a prominent range of vertical structures and noticeable alteration to the existing baseline situation with a high magnitude of change, leading to locally isolated moderate to major-moderate adverse effects.

i.e Viridis themselves have admitted and acknowledged that the distance to Higher Aushaw has major adverse affects which would be even worse at a closer distance as our house is than the photo point.

We have very strong concerns regarding the planning application, even more so after discussions and visiting the site of another turbine.

This was further proven by our request for a picture representation of the effects of building these turbines on our land and the adjoining land. Matt Jackson provided these as he is still interested in trying to convince us that the placement of the turbines is a good financial decision for us. Matt came with technical equipment and provided the evidence for this himself.

As we and you can't trust such a simple matter of measuring distance from our house to the closest turbine we have no confidence in any of the given figures regarding safety in;

- water supply being only "minimally" affected? If its different by the same margin as the above then perhaps we will be poisoned?

- noise, apparantly this can be "limited" to 35db. But is this 35db measured at 455m or the more realistic 330m? And can we trust it will in fact be limited and monitored.

- shadow flicker, is this calculated with our distance at 455m or 330m?

We have tried hard to be open minded and speak to Matt regarding the wind turbine development but we cannot support something we have no trust in. We have been offered the financial benefits of these turbines but this doesn't mean anything to the health of our children. Especially as we have been personally told by him of the "financial contributions" to local centres to gain support for the scheme as this effectively is attempting to manipulate the planning decision by way of financial gain to them and him.

After we advised Matt of the above his response was an underhand comment that the turbine could be simply moved over the fence to another land owner but we wouldnt have any financial benefit. We didnt say anything immediately but considered this basically a threat. i.e. accept it or it will be moved and you'll have the same problems and risk without financial recompense anyway.

I would strongly urge the deciding planning committee members to visit the site of his other turbine OL11 5UN and standing 330m away before deciding whether this is acceptable and whether the information provided by viridis is actually reliable and accurate (of which the above can easily be checked) and potential errors in the planning application warrant the risk of the council approving such a scheme, especially when it is our understanding that the scheme has no guaranteed financial backing and the measurements and statistics that are provided so far are only valid for another year and wouldnt be valid if the planning was changed or if in fact the distances were wrong anyway.

I would very much hope that the planning members would regard your councils own recommendations of 490m distance to a property to be safe.

This is entirely possible but doesn't consider any of the factual and very real concerns we have on the moorland if in fact the peat moorland should be disturbed at all. Matt Jackson stood in front of us and told us that the peat report showed the moorland to be as dry as bone. We can testify that this is absolute and 100% fabrication as I have personally sunk my leg into the site on walking the land.

In fact government guidance and commons examples of turbine application rejection include examples that are similar or indeed without as much affect to our property in distance;

House of Commons

BRIEFING PAPER

Number 04370, 13 July 2016

Planning for onshore wind

6. Some reasons for rejection

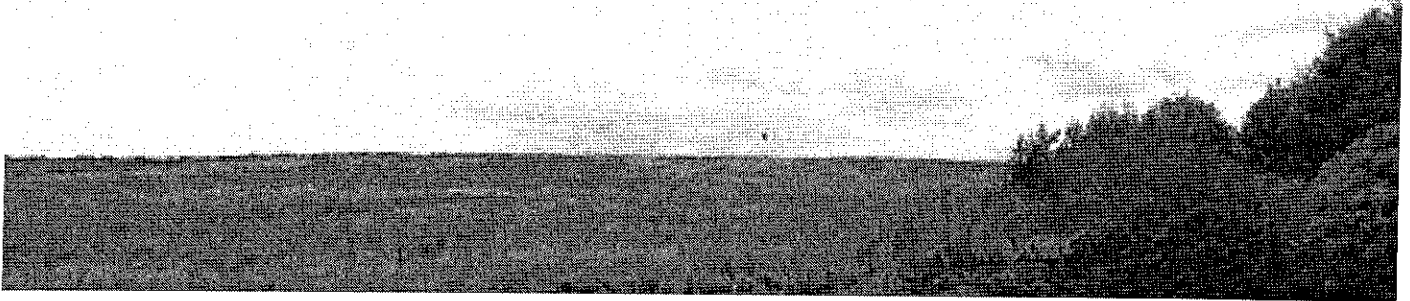
Here are some examples of refusals by planning inspectors or the Secretary of State, since the start of 2009 for onshore wind developments. This list is not exhaustive:

- Five 100m high wind turbines were rejected at a site in North Yorkshire primarily due to landscape harm and a serious adverse effect on residential amenity at a nearby farm. An inspector held that the landscape contributed to the area's distinctive character.²⁴
- A proposal to site seven wind turbines in the Grampian foothills has been rejected on the grounds that it would have a significant adverse effect on landscape character and harm visual amenity.²⁵
- A proposal for four wind turbines 125 metres high on the Northumbria coast was dismissed because it would undermine landscape character and local residents' amenities.²⁷
- A proposal for 12 wind turbines 145 metres high and a permanent meteorological mast in the Trent Valley was rejected, although the site lay within one kilometre of eight power stations and was crossed by pylon lines. The inspector held that the turbines would still have a significant effect on the surroundings.²⁸
- A 75-metre high wind turbine in Southern Scotland was rejected because of its harm to the setting of a historic hill fort 500 metres away.²⁹
- A proposal for two wind turbines with a hub height of 24 metres close to a racecourse in Somerset was blocked partly due to the adverse effect on the horses.³⁰
- The Secretary of State refused planning permission for two wind turbines at a farm in Staffordshire stating that local concerns about the effects on the landscape and townscape quality had not been addressed.³⁴

Lastly I provide the actual report and pictorial evidence that Matt himself created to further show why this project is a terrible idea for the area, the environment and higher aushaw.

Here are the beautiful views of our lovely area in pictures I have taken myself;





As you can see from these pictures the land and area is BEAUTIFUL unspoilt moorland. The clear skies and the nature around us is both astounding and inspiring. What the pictures above do not convey is the abundance of life in the area. In the short time we've been here we have witnessed more wildlife around us than we have witnessed in our entire lives. This land should not be abused to satisfy the ideology of a "renewable" benefit and certainly not be abused to benefit and line the pocket with millions of pounds of taxpayers money to someone who doesn't even own the land. If we could help Nature England to classify our land alone as a site of special interest tomorrow we would.

With this in mind here is the evidence provided by Viridis of the proposed effect on our lives;

Project:
Hockliff Moor Renewable Energy Project

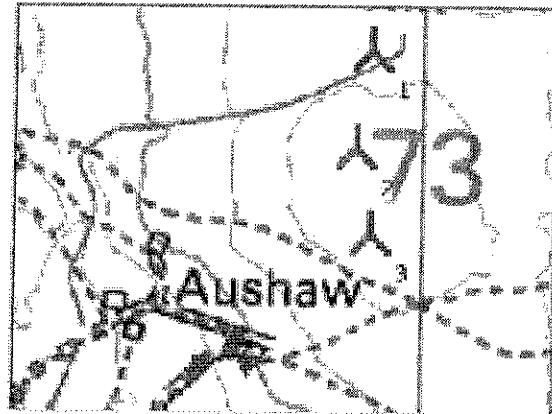
Client:
Pac Resources with
renewable energy
project.

Created with:
Viridis Wind Turbines (Global) and
Data of York House Johnson New Road, Wetherby
GB-DATUM 000 000
+44 7766 320734
Viridis Global / viridis.global@gmail.com
Copyright:
28/10/2016 17:18:11.578

VISUAL - Main result

WTG siting

WTG type	Wind direction	Type	Power	Rotor diameter	Hub height	Distances to locations				
						A	B	C	D	E
1. 10000 200	1000	10000-2000	1000	100	100	100	100	100	100	
2. 10000 200	1000	10000-2000	1000	100	100	100	100	100	100	
3. 10000 200	1000	10000-2000	1000	100	100	100	100	100	100	



A Near WTG
Camera
Scale 1:100,000

A 172000 40000 left corner of house.JPG



B 172000 40000 left top of drive.JPG



C 172000 40000 left of left corner of house.JPG



D 172500 40000 at HA gate.JPG



E 172500 40000 at HA gate.JPG



This is what my children would have to look at every day, every birthday, every special occasion, riding their ponies, on waking and listen to while they sleep;



Target	Face	Dist	Height	Angle	Dist	Angle	Dist	Angle	Dist	Angle	Dist	Angle	Dist	Angle	Dist	Angle	Dist	Angle	Dist	Angle
Wind turbine	100m	100m	100m	100m	100m	100m	100m	100m	100m	100m	100m	100m	100m	100m	100m	100m	100m	100m	100m	100m

Recommended observation distance: 35.0m

Point of view: 10° 42' 54" North 25° 00' 00" East
 Eye point: 10° 42' 54" North 25° 00' 00" East
 Wind direction: 284° Direction of photo: 28°
 Software: WindPRO version 3.1.5.75
 Project: C:\p16\test\pics\UTM02 420.37 left garden of house 206

Created by: WindPRO Software GmbH Ltd
 Trade of WindPRO Software from East, Westside
 CE-DATUM: NAD 83
 Unit: 1000000
 Wind: Global; wind.globe@gmail.com

We will see and hear these turbines;

- out of every window
- in our bedrooms
- in our living rooms
- in our kitchen
- on our driveway
- in our garden

We will see the flicker of these passing our windows and hear their drum whilst i try to rock my baby to sleep.
 It is obvious from the evidence above that the shadow flicker assessment is greatly miscalculated not only with the distance but also the angulation required.

The sun is at the end of its autumn run on the right of the above picture as seen with the shadows cast.
 The sun will rise to the left of the above picture as north is shown in the calculations to be behind.
 As such as it passes behind the above picture there will be a great shadow of the whole turbine and blades flickering over our land, house, garden and in our eyes constantly.

The view of the further two is equally as disturbing to our view from our garden;

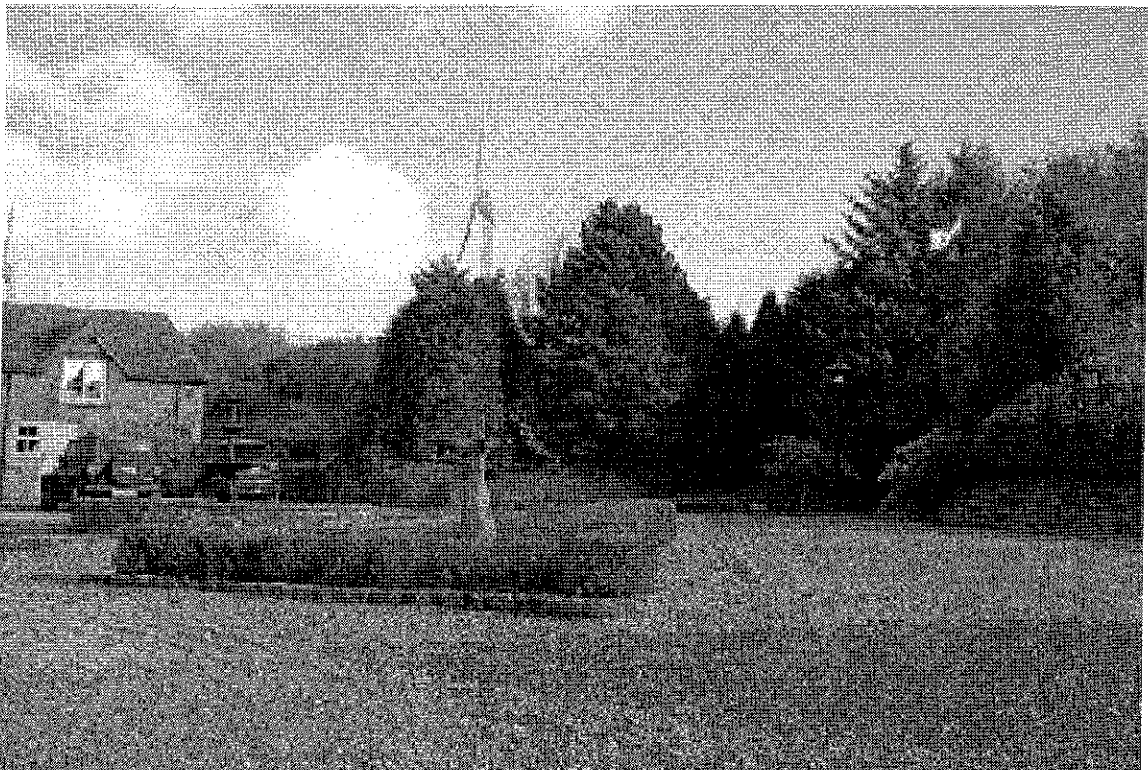


Project	Date	Time	Location	Altitude	Distance	Direction	Notes
Blackburn Moor Renewable Energy Project	25/10/2016	15:11:01	Blackburn Moor	150m	35m	180°	Recommended CC separation distance: 35 cm Photo captured: 25/10/2016 15:11:01 Field of view: 35.7°(H) x 26.2°(V) lens: 32 mm film: 36x48 mm Focal: 32mm Eye-point: 161°(Az) (Zenith) East: 372.87m North: 444.16m Wind direction: 100° direction of photo: 49° Software: windPRO version 3.1.175 Photo: C:_1A And photo\22229-4200000 left top of view.PG

windPRO 3.1.175 - the wind measurement and analysis software for professionals

WINDPRO

The view from our driveway;



Project	Date	Time	Location	Altitude	Distance	Direction	Notes
Blackburn Moor Renewable Energy Project	25/10/2016	15:11:01	Blackburn Moor	150m	32m	180°	Recommended CC separation distance: 32 cm Photo captured: 25/10/2016 15:11:01 Field of view: 35.7°(H) x 26.2°(V) lens: 32 mm film: 36x48 mm Focal: 32mm Eye-point: 161°(Az) (Zenith) East: 372.87m North: 444.16m Wind direction: 100° direction of photo: 49° Software: windPRO version 3.1.175 Photo: C:_1A And photo\22229-4200000 left top of view.PG

windPRO 3.1.175 - the wind measurement and analysis software for professionals

WINDPRO

The view to our house from the approaching lane;



Recommended observation distance: 35 cm Project: 10/14/1117 Field of View: 35.0° x 11.0° Lens: 50 mm f/1.8 ISO: 4000 Exposure: 1/1000 (Manual) Shutter: 1/1000 ISO: 4000 White Balance: 4000 (Auto) Direction of photo: 0° Software: viridis version 3.1.5.17 Author: C. L. G. 10/14/1117 10/14/1117		Contact: 10/14/1117 Name: 10/14/1117 Email: 10/14/1117 Website: 10/14/1117
---	--	---

I have to question why images like the above aren't with the planning application. The reason is obvious, Matt Jackson (Viridis) knows how bad the impact will be on the local residents.

We have also absolutely valid reasons from our research and our discussions personally with other residents and with Matt as to why this application and ones like it should NEVER be entertained by this council;

1) Denial of prior application refusal reasons

The applicant appears to be in denial that application 10/14/1117 was refused on four valid and still pertinent grounds. The applicant views this submission as a continuation of earlier applications and an opportunity to address the grounds for refusal. I quote from 2.2 of the application "this was refused as further studies were required to provide baselines in which a comprehensive decision on impacts could be made". This is not correct. It was an outright refusal. Furthermore, as far as I can see the applicant has not even made an attempt to address some of the reasons for refusal, but rather has decided unilaterally that the reasons given by Planning were wrong and has dismissed and disregarded them.

I also think that the hundreds of people who objected to the 10/14/1117 application (and indeed the 10/13/0829 application) are entitled to believe that the application was refused and that the reasons for refusal stand.

Our discussions with Matt only reinforce the above as he brazenly stated that he wasn't bothered by the RSPB and Nature England's objections and he can simply alter plans as he sees fit by amending them after the application is granted.

2) Political guidelines

As well as those discussed in detail above, since the 2014 submission there have been significant changes which the application does not address. National guidelines on planning for onshore wind have changed and in June 2015 the Government's policy emphasised that the planning impacts identified by local people should be addressed and planning permission should only be given if proposals have their backing.

As such our opinion should be greatly considered. This application has to be considered in this context, whereas the bulk of the submission is what was relevant under previous guidelines.

The Borough's Local Plan has also been updated and is more aspirational. In the 'Site Allocations and Development Management Policies' adopted in December 2015, there is clear recognition that the dramatic landscape is one of its principal assets. Taking extracts from the document "The visibility of open upland countryside from many parts of the urban area helps convey a sense of place, and is a factor in the attractiveness of Blackburn and Darwen as a place to live and to invest" and "the open landscape creates a sense of unspoilt beauty which is highly attractive". This is all part of the Council's aspiration to encourage inward investment, to improve social aspirations and to raise the area's economic wealth and wellbeing across the whole of Blackburn with Darwen.

We can confirm the above comments wholeheartedly as we live and breathe on the land on the site proposed.

3) Business Proposition

We can personally attest to the monetary gain aims of the applicant. In fact, not only did he personally tell us that it will definitely go through for various reasons and he stated that we would be in line to receive a good sum per year. When we discussed other concerns the very real threat was made as we discussed above that he would simply amend the application after it was granted "which is easy to do" to "just" over the fence and it would affect us in just the exact same way with the same appearance but we wouldn't benefit financially "just as he had done with Middle Aushaw Farm and moved the track run to Broadhead Road". Middle Aushaw Farm is still against the application and were against it previously when the access track was between our houses. Middle Aushaw didn't want this next to their land as we do not and Matt basically bragged about how they'll end up with nothing and they should have taken the deal.

He bragged about the fact that he would make "payments" for local schemes and "charitable donations" for their support to influence the planning decision to "make sure we get it through and benefit us both financially." Therefore I would request any related support from these people be ignored and these promises considered bribes. We flat out said this to him and he laughed it off.

4) Credibility

Matt Jackson stated he had loan agreements made on promises that were directly affected by the tariff coming to an end next year, the ability to place three turbines by the end of next year and planning permission being granted. This is very poor business practice as he has no fiscal guarantees. He therefore could go bankrupt at any time leaving the moorland a mess with no one to blame as his company could disappear overnight. The moorland peat would have been perilously affected for absolutely NO gain and would need a great deal of investment at cost of the council/country/tax payer to rectify Viridis mistake.

5) Noise and Health

There is strong evidence that wind turbine noise (because it is strongly modulated) unlike road traffic noise, is not something that nearby residents can ever get used to. It is also worth noting that turbine noise problems may not be restricted just to properties in close proximity. Given the topography of the area with hills and valleys, the sound waves can be transmitted for considerable distances.

We can personally testify to this having visited and stood underneath and at distances away from an identical turbine in size placed by viridis. In fact, within 10 minutes of standing under and near a turbine we both had headaches. I would strongly suggest the planning members visit the rochdale turbine to see and hear this for themselves.

There are many papers from academics and medical doctors (see Cranberry Turbine Planning Proposal which has links to many relevant published research) which show that the types of noise from wind turbines are more harmful than some people state. There is a strong suggestion that wind turbines should not be sited within 2km of a dwelling. Again we would request this as the lives of two young children may be affected by this.

A second consideration is the shadow flicker effect. When the sun is behind the blades of a turbine it casts a shadow; and as the blades rotate this is a flickering shadow. This is at best annoying but it can also have a strobing effect which many people find difficult to live with. This shadow flicker is often experienced inside a house and not just in outside spaces. This is easily seen to be confirmed by Viridis own supplied mockups above.

Solar glint, caused by sunshine reflecting off the rotar blades, can create a flashing or strobing effect too, although I appreciate that modern coatings on rotar blades should greatly reduce this annoyance, it may still have an effect on us and livestock and animals.

As the installation of commercial wind turbines is becoming more frequent there is increasing evidence, from a variety of sources, of the adverse impact they can cause to health. A four year study which was the subject of a masters thesis carried out by the Faculty of Veterinary Medicine, Technical University, Lisbon, Portugal and completed in 2012 linked wind turbines to deformities in foals born on a stud farm.

We plan on having further children and my wife is extremely anxious that wind turbines nearby may affect the development of any children born and raised here.

The study measured the ground vibrations caused by wind turbines and found them to be of different frequencies. The research has shown that vibration effects bone

metabolism. Cellular mechanotransduction is the mechanism by which cells convert mechanical signals into biochemical responses. If this can happen in horses there is every reason to expect some effect in humans and domestic livestock. It is worth noting that the distance from the stud farm to the nearest turbine was similar to that proposed for the Hoddlesden turbines, if not closer for ourselves at Higher Aushaw.

6) Local Ecology

A decision is awaited from Natural England about the designation of the area as SSSI. I understand from conversations with Natural England's officers that these moors have improved dramatically in recent years and are of sufficient quality to meet all the requirements for SSSI designation. This is not the derelict, rural wasteland the Viridis report would have one believe and we would welcome any planning officer to see this on site on our land.

Indeed the Viridis submission now acknowledges that the installation would cause ecological damage. (It is interesting that this was deemed insignificant in the 2013 application). Viridis describe this as unavoidable and propose an ecological compensation/enhancement scheme.

Peatland locks in 20 times as much carbon per acre as the average woodland.

Viridis confirm that the access road, and the installation of turbines in their massive concrete bases, and the channel for the cables must inevitably damage the peat moss and its grasses and mosses. And if the rolling mat fails the disruption will be huge.

Summary

In summary, as confirmed by Section 14.9 of the Viridis report there is clear acknowledgement that visually, for properties close to the turbines such as ours, the magnitude for change is very high "resulting in significant major adverse effect". This is confirmed by the pictures that Viridis (Matt Jackson - the applicant) has himself provided.

On a personal note, we have just purchased Higher Aushaw Farm because of these beautiful views and the potential of the property to ride these moors with horses and farm the land with sheep and possibly deer. This would NOT be possible if these turbines were so close as can easily be seen on the above pictures. The animals have very acute hearing and would be very upset to be near the turbines and any reckless decision granting this application may even in fact endanger the lives of any horse rider in our fields next to the turbines by spooking the animals causing them behavioural problems and rear causing an accident.

We write this in good faith that the contents will be read by yourselves and used to decide this application in confidence only but not passed to Mathew Jackson or anyone related to Viridis to prevent any retribution.

PLEASE REJECT THIS APPLICATION

Should you need anything else from us please do not hesitate to get in touch.

Kind Regards,

Adam & Louise Nulty

Higher Aushaw Farm.

Far Hillock Barn

Roman Road

Hoddlesden

Darwen

BB3 3PP

15th August 2016

Brian Bailey

Director of Planning and Prosperity

Town Hall

Blackburn, BB1 7DY

Dear Sir,

Re Planning Application Reference: 10/16/0704

Installation of three Wind Turbines, Access and Infrastructure at Hoddlesden Moss

I am writing to **object** to the above application and I live in one of the nearest properties to the proposed installation.

This application is, I understand, supposed to be a new one. I challenge that this application is actually a **valid** one and believe that the Planning Service would be correct to dismiss it without further consideration. The reasons for reaching this conclusion are as follows:-

1) **Process.**

There has been no compliance with the process required for applications of this nature.

- i) As far as I am aware there has been no consultation with the community. The applicant's submission refers to consultations which took place in 2013 and which related to application 10/13/0829. (Note. Not even the previous application 10/14/1117).
- ii) The Council offers pre-planning advice and as I understand this has not been followed for this application. It surely cannot be assumed that historical pre-planning advice for earlier applications is valid. Especially as Reason 4 of the refusal decision for the previous application clearly focuses on the pre-planning advice offered by the Local Planning Authority. My understanding of Reason 4 is that the application was not fit for purpose, and there was no perceivable modification that could make it acceptable.

2) **Misrepresentation.**

The applicant appears to be in denial that application 10/14/1117 was refused on four valid and still pertinent grounds. The applicant views this submission as a

continuation of earlier applications and an opportunity to address the grounds for refusal. I quote from 2.2 of the application "this was refused as further studies were required to provide baselines in which a comprehensive decision on impacts could be made". This is not correct. It was an outright refusal. Furthermore, as far as I can see the applicant has not even made an attempt to address some of the reasons for refusal, but rather has decided unilaterally that the reasons given by Planning were wrong and has dismissed and disregarded them.

I also think that the hundreds of people who objected to the 10/14/1117 application (and indeed the 10/13/0829 application) are entitled to believe that the application was refused and that the reasons for refusal stand.

3) **Quality of the Application**

This application is full of errors and does not appear to be a new one. It is almost entirely cut and pasted from the previous application (10/14/1117) without rigorous checking or proof reading, which has resulted in inconsistencies of dates and factual errors. There are also other errors of fact which are not the result this duplication of applications. I am happy to list these if it would be helpful but I am also sure the Planning Service will be vigilant.

The quantity of the information provided does not equate to quality – much of it is repetitious – and it is as if the applicant is trying to suggest that volume gives credibility and legitimacy. It does not!

The reports from the professional experts are, on the whole, generalist comments by people who have no real knowledge of, nor commitment to the area.

4) **The Changing Political Climate**

Since the 2014 submission there have been significant changes which the application does not address. National guidelines on planning for onshore wind have changed and in June 2015 the Government's policy emphasised that the planning impacts identified by local people should be addressed and planning permission should only be given if proposals have their backing. This application has to be considered in this context, whereas the bulk of the submission is what was relevant under previous guidelines.

The Borough's Local Plan has also been updated and is more aspirational. In the 'Site Allocations and Development Management Policies' adopted in December 2015, there is clear recognition that the dramatic landscape is one of its principal assets. Taking extracts from the document "The visibility of open upland countryside from many parts of the urban area helps convey a sense of place, and is a factor in the attractiveness of Blackburn and Darwen as a place to live and to invest" and " the open landscape creates a sense of unspoilt beauty which is highly attractive ". This is all part of the Council's aspiration to encourage inward investment, to improve social aspirations and to raise the area's economic wealth and wellbeing across the whole of Blackburn with Darwen.

Much is made in this planning application of the National Planning Policy Framework with its emphasis on securing economic growth, and highlights that sustainable development has three interrelated dimensions of economic, social and environmental factors. Retaining Hoddlesden and Aushaw Mosses in their unspoilt form would contribute more to the Borough on every one of those dimensions than any supposed gains from wind turbines.

- HOWEVER, despite not believing this is either a new or valid application in case this is allowed to proceed I find myself in the position of having to lodge my reasons for objection for the **THIRD** time.

I understand from discussions with the planning department and from reading the Council's website that the grounds for objection are prescribed and fall into categories detailed under 'Policy 37. Wind Turbines'. I shall follow this framework for my objections. However, the applicant's submission is far wider ranging and tries to set a broader context for the application and I believe that it would be completely inequitable if I am not given the opportunity to comment, challenge or refute some of the contents of the Viridis submission. I therefore propose to firstly offer general observations on the submission, followed by comments under more specific headings.

1. GENERAL OBSERVATIONS

Climate Change and the Environmental Argument

There appears to be an assumption running through the submission that all those who object to this application have no concerns for climate change and the need to reduce carbon emissions. This is completely incorrect and on the contrary many objectors are very well informed about the debate, and are more aware of where wind turbines fit into the overall scheme of things; but they also recognise the shortcomings of wind turbines with their intermittent/unreliable energy supply. As the electricity they generate cannot be stored there would always be a need to retain the other forms of power generation. The UK's future energy needs and security cannot ever be met by wind energy developments alone. On-shore turbines are only one option in an energy portfolio which will inevitably include, in Lancashire's case, nuclear, off-shore and probably shale (as a lower carbon alternative).

Many objectors also felt aggrieved about the business model behind wind turbines and their heavy subsidisation. Community benefits are in fact funded by the tax payer and by everyone who pays energy bills.

It would appear that the government wishes to have a pause in onshore renewables. Approval has been given for Nuclear and there have been a number of Ministerial visits to Lancashire encouraging the development of Shale. Lancashire already has a good record for the contribution it makes now, and will be making, to the UK's energy requirements, so why sacrifice the special area that is Huddlesden-Aushaw Moss? Especially as that sacrifice could in fact have a negative impact on combating climate change.

Indeed the environmental argument is suspect throughout this application and is clearly open to challenge from a variety of credible scientific sources. Wind turbines are far less environmentally friendly than they first appear. The carbon emissions generated in the manufacture, transportation and installation of the turbines are significant. The actual operation of the turbines and the figures for electricity generation is also open to question. A report for the Renewable Energy Foundation by Professor Gordon Hughes, a former senior energy advisor to the World Bank, published last year highlighted that wind turbines usually

operate at a fraction of their "capacity", 25% is a figure quoted for some turbines. It also showed that due to wear and tear on their mechanisms and blades, the amount of electricity they generate very dramatically falls over the years. A turbine that on average generates at 25% capacity can degrade over 15 years to produce less than 5%.

The Renewable Energy Foundation have also published a report that states that with the existing capacity and applications already in the system there is more than enough to meet the UK's renewables targets.

It is clear that this is really just a business proposition and Viridis and the three landowners are in it for the money. The emotional tug of 'third generation farmers' wishing to diversify is patently incorrect in the case of at least two of the landowners – both of whom have their properties up for sale, and no longer live in the area. It is also interesting to note that the nearest farming families who are real third generation farmers all oppose this installation.

The Consultation Process

In my objection to the previous applications on this site (10/16/0704 and 10/13/0829) I commented at length about the highly flawed and inaccurately reported consultation process which Viridis claimed to have undertaken. It seems that this new application refers to the consultation process for the FIRST application and again I find the comments in section 9.51 highly misleading – the very limited public meetings were vociferous in their opposition. Section 9.54 is particularly misleading because ecological compensation and forest replanting weren't even on the agenda in 2013!

Section 9.56, about the support of the Carus Centre, is again a straight lift from the previous application, and I believe this is no longer correct. I understand that the East Rural Community Association no longer supports this application.

The only personal consultations with neighbouring properties,(not landowners involved in this bid) that I am aware of, from Matthew Jackson, Viridis Director, the applicant for this submission, have been visits to my neighbours at Middle Aushaw Farm and Cuckoldman's Farm. He offered a financial incentive to one and sought to persuade them of the benefits that would go to Hoddlesden if his application were successful. Their opposition to the installation remained unchanged.

The consultation process for the last application was largely undertaken with individuals or small groups with vested interests i.e. those who would receive financial benefit from Viridis if the application were to be successful. I am not convinced that they were presented with the full picture. As I asked in my previous objection, how can it be fair and just that a decision could be influenced by payments offered to a few groups when the wider communities of Hoddlesden, Edgworth, and indeed the whole Borough, and those most directly affected will suffer?

The Credibility of Viridis Wind Turbines Ltd

I have grave reservations about the credibility and financial standing of this company. The company does not appear to have a proven track record in this field of commercial turbine installation. There are also big questions about this company's financial position.

To be absolutely clear Viridis Wind Turbines Ltd is Matthew Jackson.. At the time of the 2014 application there were two Viridis companies that had Matthew Jackson named as a director. One is Viridis Wind Turbines (UK) Ltd and the other is Viridis Wind Turbines (Global) Ltd. Both are private limited companies. [Other UK and international companies with Viridis in their name have no connection].

The company's financial state was and remains parlous. I will provide balance sheet details at a later date. This does not inspire confidence in the company's ability to deliver. In this submission Viridis state that the company will pay substantial sums to the landowners, and also sums to community groups. It leads one to question if Mr Jackson's statement made on 24/11/13 - that there would be no outside financiers and he would be financing this via help from the banks – can be believed? The banks would not loan the huge sums involved to a company with no assets to secure against, and a sole director with insufficient personal assets. The best that Mr Jackson could do is opt for a joint venture or 'sell' the benefit of any planning approval to a company that does have sufficient assets. Where is the integrity and commercial transparency in all this? Where is the commitment to this area?

I also have grave reservations about Mr Jackson's integrity. At the time of the previous application Mr Jackson distributed a leaflet in Hoddlesden village, which basically promoted the financial benefits that could accompany the turbine installations, which could be construed as a bribe - without also explaining the negatives or the full picture, and at the same time maligning both our local councillor, Julie Slater, and our MP Jake Berry. The suggestion made was that Mrs Slater was opposed to the turbine development purely because Mr Jackson had nearly beaten her in the local elections. I do not feel the need to defend either my local councillor or MP as I'm sure they are capable of speaking for themselves but nevertheless Mr Jackson's claim was statistically nonsense. The issue that offered me most about this leaflet was that it was a deliberate attempt to undermine and discredit the democratic process. I find this outrageous and such tactics have to call into question Mr Jackson's personal integrity and professionalism. Mrs Slater had fought, and convincingly won her East Rural seat on an anti-turbine platform.

2. SPECIFIC OBJECTIONS

Adverse Visual Impact and Adverse Impact on the Character of the Area

This was one of the reasons the previous application was refused. As far as I can see nothing has changed in this respect in this submission. The rationale Viridis has taken is that the Local Planning Authority were wrong to make the decision they made and therefore Viridis has dismissed it and merely re-presented their earlier submission. It is worth noting that very many of the objectors to the earlier applications were in agreement with the Planning decision.

It is proposed to locate the wind turbines in a stunning area of moorland which stretches in an almost unbroken line from Hoddlesden village to the outskirts of greater Manchester. This part of the West Pennine Moors where the proposed turbines would be located is covered by the Countryside Rights of Way Act 2000 and gives the public 'right to roam'. The fact that there are only two designated footpaths seems irrelevant. It is an area enjoyed by many - walkers, cyclists, horse riders and by those who just enjoy gazing down on its unspoilt beauty. Others have coined the phrase 'wilderness therapy'. People need wild unspoilt places for our mental health and wellbeing. There is an almost spiritual element to the experience of these moors. These moors are also a major attraction for visitors to the area who relish the peace and tranquillity; the contrasting moods of the moors – dappled by sunlight and cloud shadows one minute, wild and tossed by winds the next. The Viridis application seems to infer that this area is some sort of neglected wasteland

Three commercial turbines equate to the industrialisation of the area. They would visually be totally out of character and conflict with the intrinsic value of the area and ruin it. The visual impact would be further adversely affected by the wind farm in Hyndburn. This would represent an unacceptable and very negative cumulative impact for the area.

They would be highly prominent and visible from miles away in all directions, despite any claims to the contrary that Viridis might make.

Viridis make the argument in section 14 that the scenery is already compromised by the wind farm in Hyndburn, and pylons have already diminished the area's sensitivity to wind turbine development. The latter seems a strange argument as the pylons are not on this moorland but on adjoining farmland. Similarly pylons are a very different proposition in scale and positioning from turbines – turbines are bright and they move and are sited on prominent elevations. Section 14.12 refers to other consented turbines in 5km of this site but fails to mention that these are smaller scale, and not in the middle of stunning moorland. It also fails to mention that the one that went to appeal was lost. Section (14.9) makes the breath-taking comment that the visual effects of the turbines will generally reduce with increasing viewing distance. Of course they will but they will still be visible from great distances.

It is worth noting that the local authority's own existing policies and plans give clear direction and weight to refusing this application. Blackburn with Darwen Council's plans recognise the importance of preserving the countryside and the open landscape and that these are one of the districts finest assets. It is important for the quality of life of its residents and for attracting investment in the Borough

The proposed turbine location is in a designated **Countryside Area**.

Similarly, the area is part of **the West Pennine Moors County Heritage Sites – Biological** designates Hoddlesden Moss as a **Bog**. Adjoining Aushaw Moss is also a **designated bog area**.

Hoddlesden, Edgworth and Chapeltown are conservation areas.

In addition to existing policies the council's 'Wind Turbine Development in Blackburn with Darwen – A Guide for Developers' published in May 2013 but not yet replaced/updated identified landscape sensitivity to wind farm development. It states that "turbine development is more likely to be acceptable if it is in areas of lower sensitivity. Turbine development within

or affecting areas of high sensitivity will rarely if ever be acceptable." The proposed siting of these turbines is in an area of moderate to high sensitivity.

Similarly, the decision from Natural England on SSI designation for the moorland is awaited, but whatever the final outcome this shows the value of the area.

As a final point in this section I believe that the proposed site chosen for the three turbines would make it so easy for the developer (or future developers) to 'backfill' with additional turbines at little additional cost. Similarly, I have heard that at certain wind farm sites developers have applied for x number of turbines but as soon as planning had been obtained then going back and arguing that x wasn't financially viable so they need to install multiple x.

Adverse Impact on Neighbouring Properties and Personal Adverse Impact of the Proposed Turbines

I and my family have been privileged to live at Far Hillock for 37 years. Our land adjoins where the three proposed turbines would be located. The nearest turbine would be a few hundred metres from my home. The 76.5metre turbines, and their positioning on land that is 1000ft above sea level, would be totally intimidating and dominate the views and indeed many visual aspect of my home. If I were in the garden or field there would be no avoiding them. They would be there 24 hours a day and there would be no respite from them.

The main outlook from my property is onto the moors. One corner of the view already has the Oswaltwistle Moor turbines. This proposal would then wreck the other aspect.

In Section 14.9 of the Viridis report there is clear acknowledgement that visually, for properties close to the turbines, the magnitude for change is very high "resulting in significant major adverse effect".

I believe that the erection of the turbines would have a damaging effect on my health and that of my family. There is rapidly accumulating evidence that wind turbines will have an adverse effect on health.

Noise is the first consideration. Wind causes noise as it moves over any structure, whether manmade or natural. The problem with turbines is the nature of the noise generated. A wind turbine produces a regular beat as each rotor moves behind the tower, and this can be by day or night. This has been found to lead to difficulty in sleeping, or sleep of such poor quality that people are tired during the day. There is also what is often termed 'hypo sound'. This is a deep sound of less than 16 kHz. Many people are unable to actually hear this note but nevertheless it has been found to have an effect on the hearing mechanism. Hypo sound travels much further than hearing frequency sound and penetrates houses without much quietening. This could be the reason that people who live near wind turbines often report insomnia.

There is strong evidence that wind turbine noise (because it is strongly modulated) unlike road traffic noise, is not something that nearby residents can ever get used to. It is also

worth noting that turbine noise problems may not be restricted just to properties in close proximity. Given the topography of the area with hills and valleys, the sound waves can be transmitted for considerable distances.

There are many papers from academics and medical doctors (see Cranberry Turbine Planning Proposal which has links to many relevant published research) which show that the types of noise from wind turbines are more harmful than some people state. There is a strong suggestion that wind turbines should not be sited within 2km of a dwelling.

A second consideration is the shadow flicker effect. When the sun is behind the blades of a turbine it casts a shadow; and as the blades rotate this is a flickering shadow. This is at best annoying but it can also have a strobing effect which many people find difficult to live with. This shadow flicker is often experienced inside a house and not just in outside spaces.

Solar glint, caused by sunshine reflecting off the rotar blades, can create a flashing or strobing effect too, although I appreciate that modern coatings on rotar blades should greatly reduce this annoyance.

As the installation of commercial wind turbines is becoming more frequent there is increasing evidence, from a variety of sources, of the adverse impact they can cause to health. A four year study which was the subject of a masters thesis carried out by the Faculty of Veterinary Medicine, Technical University, Lisbon, Portugal and completed in 2012 linked wind turbines to deformities in foals born on a stud farm. The study measured the ground vibrations caused by wind turbines and found them to be of different frequencies. The research has shown that vibration effects bone metabolism. Cellular mechanotransduction is the mechanism by which cells convert mechanical signals into biochemical responses. If this can happen in horses there is every reason to expect some effect in humans and domestic livestock. It is worth noting that the distance from the stud farm to the nearest turbine was similar to that proposed for the Hoddlesden turbines.

Two of the dwellings which would be nearest to the proposed turbines, Higher Aushaw and Lower Aushaw have a strong financial interest in the success of the application and both properties are up for sale with their owners now living outside the area.

The overall thrust of the Viridis argument seems to be that neighbouring dwellings' views are already compromised by the wind farm in Hyndburn and pylons have already diminished the area's sensitivity to wind turbine development. Does this mean 'it's spoilt so let's spoil it some more'? I and my neighbours don't want to suffer cumulative negative impact. It would be like living in an industrial site. The Viridis suggestion that trees can obscure the view of turbines may be true for some properties to a limited extent – but only in summer and only if the trees thrive. Most properties could not avoid seeing and being dominated by the turbines. We would lose our immediate views with the introduction of an unnatural barrier (this is open-moor, not tree country) but the 74m high turbines will still be visible for miles around, as well as many parts of ours and our neighbours' properties

Although this proposed development is literally in my back yard and I believe that I and my family will suffer, it is not purely 'nimby-ism' which motivates me; there is a basic principle here regarding the role of the moors and their value to the whole community. I have previously objected to the installation of Turbines that would similarly detract from the

character of this area –even when not in our view. (e.g. Pleasant View Farm by Bull Hill/A666) long before the prospect arose so close to home.

Adverse Impact on the Ecology of the Area

I am not an ecological expert but the current research I have undertaken would lead me to believe that the access road, the installation of the three turbines, and associated infrastructure including the grid connection cable which would run from the site to Hoddlesden, and the actual operation of the turbines would have a serious negative impact on the ecological environment of the area. The moors are biological heritage sites and undisturbed peatlands are themselves hugely valuable assets in the battle against carbon emissions. They are a store of carbon and also absorb carbon from the atmosphere. The RSPB are also strong in their opposition to this application not only from a protection of birds perspective but also the destruction/disturbance of the blanket bog and peatlands.

A decision is awaited from Natural England about the designation of the area as SSSI. I understand from conversations with Natural England's officers that these moors have improved dramatically in recent years and are of sufficient quality to meet all the requirements for SSSI designation. This is not the derelict, rural wasteland the Viridis report would have one believe.

Indeed the Viridis submission now acknowledges that the installation would cause ecological damage. (It is interesting that this was deemed insignificant in the 2013 application). Viridis describe this as unavoidable and propose an ecological compensation/enhancement scheme. My understanding of ecological compensation is that it equates to providing newly created habitats for wildlife that replace what has been lost or affected. What Viridis is proposing does not meet this criteria. It is not like for like. What is offering is something completely different. Woods are all very well but they are not peat moss and provide very different habitats for wildlife. Woods make a contribution to the government's commitment to reducing greenhouse gas emissions they are not nearly as effective as peat moss. (See article from Sunday Times 23/11/14 – Peatland locks in 20 times as much carbon per acre as the average woodland). Similarly, creation of open habitats is fine but doesn't compensate for the destruction of the moorland terrain and peat beds. I also understood that where compensation principle is being employed the first, and crucial aspect, to consider is the overall project legitimacy and necessity of intersecting protected areas. These turbines, on this site, are NOT necessary.

Viridis confirm that the access road, and the installation of turbines in their massive concrete bases, and the channel for the cables must inevitably damage the peat moss and its grasses and mosses. And if the rolling mat fails the disruption will be huge.

The moors are home to a wide variety of wildlife including badgers, foxes, rabbits, stoats and various amphibians. Many birds, both permanent residents and migratory, including hawks, kestrels, red grouse, curlews and owls have the moors as their habitat and/or feeding grounds. Watching the Canada geese arriving in the spring is a magnificent sight. All of these beautiful birds enhance our living environment and add to our well-being. It is almost certain that should these turbines be allowed we would lose these birds forever. It is also

worth noting that since the erection of the Hyndburn wind farm there has been a noticeable increase in the wildlife we have on our moors. The wildlife that doesn't die is displaced.

Insects are plentiful on the moors and provide a good source of food for our resident bat community, which is not of insignificant size as the Viridis submission seems to be suggesting. Bats have their homes in a neighbouring quarry as well as farm buildings and trees. The Viridis submission states there are no suitable bat habitats within 50m of the turbines but bats fly significantly greater distances when hunting.

Considerable evidence has accumulated to show that wind turbines kill bats and birds. The application statement of 2013 even included a report from 'Carbon Connect' which stated that wind turbines present a collision risk to birds and bats.

While the local badger population tend to have their setts in the adjoining farmland they too visit the moors. Badgers do not adapt easily to change and any development is likely to cause problems for them which could force them to move on or die out. Any disturbance to the moors will inevitably result in disruption and harm to the wildlife.

Hoddlesden moss is a water catchment area and some of the properties on land adjoining these moors have spring water. I understand from other parts of the country that wind turbine installation can also lead to flooding problems. The enormous concrete bases will affect drainage, as will the vibration effect of the turbines. I have concerns that the proposed development would have an adverse effect on the water resources in this area. Natural England has said that it is nervous about interference with the area's natural drainage patterns. It is also interesting that the application makes no mention of the SSI survey, which is yet to report.

As stated, I am not an ecological expert but the current research I have undertaken would lead me to believe that the installation of the three turbines would have a serious negative impact on the ecological environment of the area.

Adverse Impact on Highways

This Viridis submission seems little changed from the previous, refused, application. Access to the proposal is from Broadhead Road which is a narrow country road, with some tight right angled corners and very soft verges. Is the road really strong enough to support such enormous loads? Section 9.24 states "from desk-top analysis there is confidence that the roads network is acceptable". Isn't desk-top very different from the reality?

The installation would certainly cause havoc for other road users – whether they be in vehicles, on foot, or on horseback or cycle. I would have thought that this would be incredibly dangerous too.

Adverse Impact on Blackburn with Darwen

Viridis state that the development would bring benefits for the local communities in a variety of ways, ranging from the community benefit scheme, and where possible using local firms and locally manufactured materials, to indirect expenditure in local shops during the installation phase and farm income diversification. However, I think that taking the bigger picture the area and its people would be seriously disadvantaged. This is not just immediate neighbours and the villages of Hoddlesden and Edgworth but also the wider local authority

area. I understand that Blackburn with Darwen Council is working hard and making a real financial commitment to improve the perception of the area and attract inward investment and to make the borough a desirable place to live. The council wants to attract higher income earners into the borough as a whole but recognises that housing will have to be in attractive areas. The areas that surround, or have sight of, the proposed turbine site definitely constitute attractive residential areas in terms of setting. These unspoilt upland and moorland areas are one of its greatest assets and need protection from development. They are of enormous benefit and enjoyment for existing local residents and will be key to attracting new residents and inward investment.

The attraction is further enhanced by other developments. Darwen, for example, has already benefited from considerable restoration around the bus station and market areas. The opening of the Academy is another positive factor. The improved rail links to central Manchester will encourage commuting and make Darwen and its surrounding villages a potential residential area for professionals and other higher earners. The upgraded line will be of equal benefit residents in the North Turton and Tockholes ward.

The stunning landscape also attracts visitors to the area who spend money on local businesses. It is not just the two obvious businesses, most closely located to the proposed development, Moorview Equestrian Centre and Brocklehead Farm Caravan park, which benefit; their customers spend money in the local economy - in markets, shops and public houses. Commercial Turbines will not add to the appeal of the area and both Moorview and Brocklehead have lodged objections to this development.

1. Summary

I fully appreciate the need to address climate change and seek alternative sources of energy. I support the Council's wish to seek renewable energy sources to reduce carbon emissions by lessening the need for fossil fuel-powered generation but I do not believe that putting onshore wind turbines on the Borough's countryside assets are the way forward. The negatives far outweigh the positives. This proposal would bring, to use the Council's terminology, considerable 'disbenefits', in the form of visual and other impacts on the countryside; on those who live close by; and of the wider promotion and success of the Borough. There is a real danger that a beautiful part of this area's countryside and ecological heritage, which is described as irreplaceable, will be sacrificed.

Please refuse the application.

Pat Damms (Mrs)

Pat Damms

Far Hillock Barn
Roman Road
Hoddlesden
Darwen
BB3 3PP

1st March 2017

Brian Bailey
Director of Planning and Prosperity
Blackburn with Darwen Council
Town Hall
Blackburn
BB1 7DY

Dear Mr Bailey,

Re Amendments to Planning Application 10/16/0704 Wind Turbines on
Hoddlesden Moss

Following recent telephone conversations with Kate McDonald, the lead officer in the Planning Service, about amendments to this application, I have decided to write again to lodge my objections to the application. I understand that the previous lengthy objections I submitted last year will still be counted so I shall restrict myself to brief comments on the recent amendments to the submission which was originally registered in July 2016.

In the first instance I am unhappy with how the amendments were publicised. Yet again my house was not included in the letters to nearest properties, and I assure you my home is one of the very nearest to the proposed development site. [I accept Kate McDonald's assurance that this was an oversight but we have been missed repeatedly in the past]. Similarly, the only 'public' paper notification that I am aware of was wrapped round a 40mph sign, located on the brow of a blind hill. Thus almost invisible!

I have read the amendments and frankly feel that in essence this application has not changed. It continues to contain material that is not up to date and

which lifts large chunks of content from past applications made in 2013 and 2014. It continues to contain inaccuracies and misrepresentations – all of which are in the applicant's favour. Many of the reports are lengthy but contain little relevant information. In short the supposed amendments just serve to confirm this as a poor submission which I hope will give the Planning Service and the Council real concerns about the applicant's professionalism and ability to deliver.

Furthermore, questions have to be asked about why the applicant is in the position of supplying additional and different material seven months after the application was submitted in July 2016 – and that this was in effect the third application for this site. I totally understand why the Planning Service would request responses to queries but after so many submissions one would have thought the applicant would have been better prepared and ready with speedy responses. But apparently not so.

I should be happy to go through the documents giving details of inaccuracies or misrepresentations if that would be helpful but I am sure that The Planning Service personnel will have noted these themselves. I am particularly excited about the public consultation amended report and I am adamant that the comments I submitted previously still stand. Indeed I have been told by an attendee that Mr Jackson's request in September 2017 for support for the development from Yate and Pickup Bank Parish Council was rejected. Similarly there has been no support from North Turton Parish Council. The evidence of community support in the words "one resident put it thus ..." is exactly what it says – one resident and not a community.

It is also interesting to note that the letters of support for the application were very largely received a considerable time after the deadline stated by the Council. I know that at this time I was informed by Planning Service that there were relatively few letters of support. Kate McDonald explained that letters of support and objection could be considered right up until a decision is made by Planning but this is not widely known and if people had thought there was still time to object there might have been even more communications.

It is also interesting to note that most letters of support were not from people who live in the area where the development would occur, and I gather that the Council has no clear steer on the geographical significance of 'community' where planning applications are concerned.

I also question what has changed in the reasons given for refusal since the application of 2014. Would approving this application put the Council in breach of its own policies?

Indeed there have also been significant developments on the ecological front to further support planning refusal since 2014 and since July 2016. The

designation of SSSI for the area on which the proposed turbines would be sited is surely of immense significance and further serves to support the ecological arguments of objectors to the development. I would also like to draw to the Council's attention a very recent article by Simon Barnes in The Sunday Times Magazine about the importance of preserving peat bogs as damaging them is a significant factor in global warming. I attach an extract in the hard copy of this letter.

This is an application for a major industrial development in a hugely ecologically sensitive and important area. This importance is not only national but international so please safeguard this moorland and reject the application.

Yours Sincerely,

Pat Damms (Mrs)

Rokeby
61 Earnsdale Avenue,
DARWEN,
Lancashire,
BB3 1JR
2nd August 2016

FAO Kate McDonald,

Development Management Team,
Blackburn with Darwen Borough Council,
Town Hall
Blackburn,
BB1 7DY.

Dear Sir,

Planning Application: 10/16/0704

Full Planning Application

Installation of 3 wind turbines, hub height of 46m, to tip height 76.5m, to include all ancillary works at Hoddlesden Moss, Hoddlesden, Darwen.

I wish to object to the above planning application at Hoddlesden Moss on the basis of;
Its location within the West Pennine Moors;

- (i) It is environmentally unsound to locate on an area of semi-natural¹ habitat of International, biodiversity significance;
- (ii) There is in the neighbourhood cultivated land, agriculturally improved upland pastures, of lower biodiversity value which offer suitable alternatives for wind farm development with far less impact upon the natural environment; and
- (iii) Considerations over Mitigation/Compensation

These current Objections should be read in conjunction with my previous Objections to planning application **10/13/0829**.

I consider that Blackburn with Darwen Council have sufficient justification to refuse this application.

1. Objection Rationale

(i) West Pennine Moors

The concept of the West Pennine Moors back in the mid nineteen seventies followed very much the rationale and structure of a statutory National Park, but one locally designated by the partnership of Lancashire County Council, Greater Manchester Council and North West Water Authority. This 'Regional Park' was (and still is) presided over by the WPMs Area Management Committee, and had its own adopted statutory Local Plan, the **West Pennine Moors Recreation and Conservation Subject Plan: 1986**.

¹ Almost all habitats in the British Isles have been influenced by man, even the tops of high mountains in Scotland, hence 'natural' habitat is a very rare condition in Britain. It has long been the practice amongst Ecologists to use the term 'semi-natural' for vegetation types where the dominant and constant plant species are native to Britain and the structure of the communities conform to the range of the natural types. Ratcliffe, D. (ed) (1977) *A Nature Conservation Review*, Volume 1, Cambridge, Cambridge University Press.

Over the intervening years this Local Plan has been incorporated into the Development Plans of the constituent District Councils. Nevertheless, the WPMs remain in principle a 'Regional Park' with Recreation and Conservation at its core. Whilst Recreation included Tourism, Conservation embraced Landscape, Natural and Historic Heritage. In these respects, to locate an obtrusive Wind Farm at the heart of the WPMs is wholly unacceptable. It is alien to the concept of open space and wilderness for which the Area is recognised.

In this respect I refer BwD Planning to the document 'A Landscape Strategy for Lancashire' produced in December 2000 by LCC and part funded by BwD Borough Council. Hoddlesden Moss falls within Landscape 2a Moorland Hills – West Pennine Moors. Here key environmental features include 'exposed upland rolling landscape'; and the negative implications of wind turbine development are considered.

(ii) Biodiversity and Ecology

- (a) Hoddlesden Moss comprises Blanket bog, one of the most important habitats in Britain. This un-prepossessing habitat takes thousands of years to develop² and is at least as irreplaceable as ancient semi-natural woodland. Blanket bog is listed as a **Habitat of Principal Importance** under sect 41 of the NERC Act 2006. More importantly 'active Blanket bog' is an Annex 1 Priority Habitat within the EC Council Directive 92/43/EEC (Habitats Directive) as a habitat of European significance or Community Importance. 'Active Blanket bog' is defined by the Joint Nature Conservancy Council, JNCC³ as, 'typically, include important peat-forming species such as bog-mosses *Sphagnum* spp. and Cottongrasses *Eriophorum* spp., or Purple Moor-grass *Molinia caerulea* in certain circumstances, together with Heather *Calluna vulgaris* and other ericaceous species'. This condition is the predominant vegetation across Hoddlesden Moss, being confirmed as such by the ecological assessment provided by Avian Ecology Ltd (2014). Therefore Hoddlesden Moss unquestionably supports 'active Blanket bog' in terms of the EC Council Directive 92/43/EEC.

Hoddlesden Moss does not currently carry a statutory designation, although this is under consideration. It is none-the-less recognised to be of **at least County significance** through its Biological Heritage Site designation. Notwithstanding this, in considering this planning application, BwD Borough Council needs to be cognisant of the fact that Hoddlesden Moss is of **international significance** by virtue of being 'active Blanket bog' as defined in the previous paragraph. Whilst not carrying an international designation, (Natura 2000/Special Area of Conservation, SAC) the international significance needs to be recognised by BwD Planning Committee through their **Biodiversity Duty** under section 40 of the NERC Act 2006, i.e. *Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of*

² UK Biodiversity Action Plan; Priority Habitat Descriptions. BRIG (ed. Ant Maddock) 2008. (Updated July 2010), Blanket Bog, page 9.
<http://www.ukbap.org.uk/library/UKBAPPriorityHabitatDescriptionsRevised20100730.pdf>

³ JNCC (2005), The Habitats Directive: Selection of Special Areas of Conservation in the UK, JNCC Report 270.
<http://www.jncc.gov.uk/ProtectedSites/SACselection/habitat.asp?FeatureIntCode=H7130>

conserving biodiversity. In this respect giving the appropriate consideration in recognition that the habitat involved is of **International significance**.

Further, it should be recognised that statutory SSSIs (and therefore SPA & SAC designations) are representative examples, whilst Local Sites (including BHS) are comprehensive. This means that some BHS are of SSSI or even the international SPA/SAC quality. It is my opinion that this is the case at Hoddlesden as we are dealing with 'active' Blanket Bog.

- (b) As a habitats specialist and botanist, I leave matters relating to avifauna to the RSPB and others, but wish to state that I endorse their objections. In this respect I would add that I have observed Short-eared Owl and Merlin over Hoddlesden Moss on occasions over the last four decades.

I would also question the worth of the Brown and Shepherd methodology; I recall back in the 1990s this being used as a 'broad-brush' approach to systematically survey very large areas of the uplands, not as at Hoddlesden Moss, small discrete units of land. Also, that the methodology requires surveys to be completed by late June, not as here in late July. It is important that ecologists use appropriate methodology in support of Planning Applications; as a Fellow of the CIEEM this is a matter over which I have major concerns.

- (c) The EA fails to assess impacts upon Species of Principal Importance Section 41 NERC Act which may occur on or around Hoddlesden Moss. There is also a need to consider the Vascular Plant Red List for England. At least two species listed occur on Hoddlesden Moss, one is considered as Near Threatened and another as Vulnerable. Not to cover either Section 41 or Red List species should be regarded as inadequacies in the Applicants submission.

(iii) Alternative locations

Paragraph 118 of the **National Planning Policy Framework** states that: *planning permission should be refused for development resulting in the loss or deterioration of **irreplaceable habitats**, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.*

Given the age of Blanket bog, generally quoted as 5,000 - 6,000 years and possibly as much as 9,000 years, its importance is evident and comparable with our ancient semi-natural woodlands. In this respect it must be considered to be **Irreplaceable**.

Further para 118 also states: *if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission **should be refused**.* It has already been argued above that alternative sites off the Blanket bog are present in the general area, in this respect there is little justification for an approval that puts environmental resources at risk.

(iv) Considerations over Mitigation/Compensation

In my opinion it is reprehensible to impact upon irreplaceable habitats. Whilst the life of the wind farm will be finite, its impacts will be permanent. Clearly the impacts are not restricted to the construction phase, but also to the working life as well as the eventual de-commissioning phase. In these respects most windfarms plan to leave the turbine bases in-situ; whilst tracks may be removed, but here compaction of the underlying

peat is inevitable. Therefore, long-term restoration plans (up to 50 years beyond the working life of the wind farm) will be necessary should planning permission be approved. Measures to mitigate and/or compensate impacts will need to be rigorous, robust and enduring. If Blackburn with Darwen Borough Council cannot ensure measures and Planning Officer resources to safeguard this irreplaceable habitat through the planning system over this lengthy time frame then it has no alternative than to **refuse** the application.

I do not consider the mitigation presented by the applicant to be commensurate with the impact upon a habitat of international significance.

2. Professional consultation

Some twelve or more months ago I was approached by the Applicant (or his agent) seeking my professional assistance in developing mitigation/compensation measures in order to make the Hoddlesden Moss wind farm application acceptable to the Local Authority. The Applicant appeared to have informed that I had experienced in Planning and something of an authority on the habitats involved. I turned down any notion of a contract; making it quite clear that it is my professional opinion that wind farm development on Blanket bog/mire is an inappropriate intrusion on such a valuable internationally important habitat; and to jeopardise a habitat potentially so important for atmospheric carbon dioxide sequestration is unacceptable, even for a development that seeks to deliver 'green energy'. Rightly or wrongly I gained the impression that three turbines was the thin end of the wedge.

3. Applicants Supporting Documents

- (i) ***RPS Hoddlesden Moss Wind Energy Wind Energy Development - Ecological Assessment, 12 May 2016.***

Paragraph 1.2 Consideration of Alternative Development

Paragraph 1.3 Design Iterations to Avoid or Minimise Ecological, Hydrological and Ornithological Effects

The developer has here failed to show Avoidance. It needs to be demonstrated that Hoddlesden Moss is the only possible location for the proposed development and show why improved pastures of low biodiversity value in the vicinity are unsuitable. Surely their wind conditions must be similar and access would be far easier.

It is not acceptable to choose areas of high biodiversity value, such as Hoddlesden Moss, simply because they are available and of lower agricultural/commercial value than other land nearby.

Section 3. Ecology

Paragraph 3.1.3 Designated Sites: Non-Statutory Designated Sites

This part of the Ecological Assessment only considers three Biological Heritage Sites, Hoddlesden Moss itself, Aushaw Moss and Edgerton Moss. However, there are further BHS in proximity, certainly within a 2km radius. Their omission from the EA suggests that any impact by the proposed development has not been fully considered and evaluated, regardless of how negligible these may be.

It also needs to be stated whether or not there are any Geological Sites in proximity, and if so an assessment provided.

Paragraph 3.3.1 Badgers

It is worth noting that on the 18th July 2016, I observed Badger footprints in wet peat at grid ref. circa SD73112147 on Hoddlesden Moss.

Moorland Badgers are a feature of some parts of East Lancashire so the statement made by RSP that '*The habitat at the site is considered to generally offer low suitability for badgers*' **should be disregarded** without definite field evidence. Assertions made over Badgers in 3.4.1 *Ecological Receptors* and 3.4.2 *Impacts of the Development on Ecological Receptors* should be read in this context.

Paragraph 3.4.1 Ecological Receptors

Modified Bog

Whilst it is true to say that the Blanket bog habitat at Hoddlesden Moss is modified, this being the prevalent condition of the habitat in England, to apply the term 'degraded' is misleading. In my professional capacity, I use the term 'modified' widely, but reserve the term 'degraded' for bog with bare peat or little if any remaining semi-natural vegetation (as was the case on Kinder Scout and Bleaklow, parts of the South Pennines SAC). Using the term 'degraded' to describe Hoddlesden Moss does the quality of the habitat a major dis-service

The assertion in this paragraph that the Blanket bog at Hoddlesden Moss is, '*unlikely to be peat forming*' and that as a consequence '*does not qualify for status as an Annex 1 habitat under the Habitats Directive*', is at best misguided, at worst factually misleading. As covered in 1(ii) above, bogs capable of forming peat are known as 'Active', a condition required for this Annex 1 Habitat. In this respect the term 'Active' is defined by JNCC³. Clearly this condition prevails at Hoddlesden Moss.

Peat

The assertions made in this section by RPS are questioned. During my site visit on the 18th July 2016 following the approximate line of the proposed access track it was observed that the surface peat was wet, in localised bare patches it was sufficiently wet to allow footprints to be left (including those of Badger). Certainly around the post assuming to mark the location Turbine 3 there were bog pools present with standing water. As if to confirm the wetness, within a short time walking over the Moss I discovered that my boots no longer repelled water and that my feet were getting wet despite it being a sunny day. This is at odds with the RPS findings over watertable.

Paragraph 3.4.2 Impacts of Development on Ecological Receptors

Under the sub-heading Habitat this section deals with areas of direct and indirect impact, and considers these to be small. Any loss or impact to an internationally important habitat should be avoided at all cost. Measures such as floating tracks are identified. Sadly such measures as floating tracks, were promised on Scout Moor and Hoddlesden Moss sites but these proved not to be a wholly practical proposition when it came down to construction. Floating

tracks were not delivered on Scout Moor and I am informed that they were only partly delivered on Oswaldtwistle Moor. If minded to approve the application BwD Borough Council will need to be confident that such measures can be adequately conditioned, implemented and rigorously enforced. If BwD Council is uncertain about its long-term resources for such enforcement then it needs to **refuse** the application.

Paragraph 3.4.3 Summary of Effects to Important Ecological Features

Table 11 summarises the predicted effects to important ecological features; I consider that for Badgers needs to be re-evaluated, given my comments above.

In terms of the category Modified Bog, I cannot agree with the classification under Conservation Value of *Regional Importance (Medium)*. As described above all Blanket bog is of International importance so long as it is 'active', a condition that exists on Hoddlesden Moss in terms of JNCC³ and confirmed by the Applicants own surveys.

Similarly for Peat, peat depth of 4 metres in Blanket bog is extremely significant, warranting a Conservation Value far greater than Regional Importance (Medium).

For both Modified bog and Peat the Proposed Mitigation measures are considered inadequate, surely they are not serious in offering to do Natural England's HLS monitoring, in any event the HLS will only run for a further 5 or 6 years, far shorter than the life of the Windfarm. Also there is no certainty that the HLS will continue if the Windfarm is constructed.

Section 4. ORNITHOLOGY

With regards to Ornithological issues, I support the objections raised by the RSPB and S Martin. I have particular concerns over the dates of the survey visits in terms of methodology (see 1(ii) above). In addition the applicant makes assertions over the presence of certain species. Lack of confirmed breeding records does not indicate absence.

Section 5. MITIGATION AND ENHANCEMENT MEASURES

Paragraph 5.2 Hoddlesden Moss Habitat Management

It is preposterous that the Applicant is proposing to monitor the success of the Natural England (DEFRA) Higher Level Stewardship Scheme as part of the Mitigation and Enhancement Measures. Mitigation is about reducing the impact of the damaging development, not monitoring a Government Agency's land management schemes. In any case I consider monitoring of development impacts to be a standard element in planning approval and obligations (planning conditions), not as mitigation to justify damaging developments.

Paragraph 5.2.2 Proposed Woodland Planting

In terms of tree planting to the NE of Broadhead Road. It is not clear precisely which land is proposed so these comments are by necessity generic. Whilst I can accept that as pasture the vegetation in the proposed fields currently have the appearance of acidic grassland with vegetation '*such as sheep's fescue (Festuca ovina), sweet vernal grass (Anthoxanthum odoratum), and wavy hair grass (Deschampsia flexuosa)*'; this was not always the case in all the fields above Broadhead Road and below Edgerton Moss. Within the last thirty years I remember certain fields above this section of Broadhead Road managed as hay meadows

and supporting a species-rich sward. Given the time scale it is quite possible that there is a sufficient seed bank in the soil for re-establishment of herb-rich grassland. To cover with trees could be a biodiversity negative. Particularly so given the word 'afforested' is used in this paragraph and the planting is of a commercial timber composition.

Paragraph 5.2.3 Draft Construction Environmental Management Plan (CEMP) and Ecological Protection Plan (EPP) Document

See comments to Appendices 10 and 11.

(ii) Appendix 1 – Hafren Water (2013) Hydrological Survey Report

Appendix 7 – Avian Ecology (2014) Hoddlesden Moss Habitats And Vegetation Survey Report 2014

I do not regard this document as particularly informative, whilst it discusses the hydrological impacts of the tracks on the peat, it fails to do so for the turbine foundations and crane hard standing. In either case it fails to discuss the long-term impacts, particularly following the working life of the Turbines, i.e. how will the localised peat compaction recover.

Recommendation: I suggest that BwD Planning seek independent advice over peat hydrology prior to determination.

(iii) Appendix 2 – Hoddlesden Moss BHS Citation

See 3(i) above. There is a mismatch over Biological Heritage Sites, the Site Description Forms and Site Boundary Plans are included for Hoddlesden Moss and Cranberry Moor, for Aushaw Moss only the Site Description Form is provided. Edgerton Moss BHS is mentioned in paragraph 3.1.3 of the RPS Ecological Assessment but neither the Site Description or Boundary Plan is provided in this Appendix. Conversely Cranberry Moor is omitted from paragraph 3.1.3 but included in the Appendix. Such omission undermines the whole validity of the Ecological Appraisal.

(iv) Appendix 3 – RPS (2015) Badger Survey Report

See Paragraph 3.3.1 Badgers above.

Regrettably I have not been able to access the 2015 Badger Survey Report on BwD website; I therefore reserve the right to comment further at a later time.

(v) Appendix 4 – RPS (2015) Bat Survey Report Appendix 5 – RPS (2015) Otter And Water Vole Survey Report

I do not have comments over these at this time.

(vi) Appendix 6 – Penny Anderson Associates (2013) Natural England West Pennine Moors Phase 1 and NVC Level Site Surveys 2012

This report by PAA clearly supports the biodiversity value of both the West Pennine Moors and Hoddlesden Moss at an International level, as put forward in this planning application objection.

(vii) Appendix 7 – Avian Ecology (2014) Hoddlesden Moss Habitats and Vegetation Survey Report 2014

Not having had the luxury, as has the Applicant, to undertake a complete Phase 1 Habitat Survey of Hoddlesden Moss within the determination timeframe, I restrict my comments to the areas in close proximity to the proposed turbine locations and associated infrastructure. Whilst there may be a few ecological subtleties, these are not currently pertinent. However, what is pertinent is that the mapping not only confirms that the habitat is Blanket bog but also that it qualifies as 'active' Blanket bog as per JNCC³ (contrary to the view expressed by other Viridis supporting information - see comments to RPS Ecological assessment in 3(i)).

Notwithstanding the above, I wish to draw BwD Planning's attention to the following points within the Habitat and Vegetation study.

On the 18 July 2016, I visited the areas associated with the three turbine locations and below comment upon the vegetation within the Target Note Areas. These areas were surveyed by Avian Ecology in 2013.

Turbine 1 Target Note Areas 52 & 53

Avian Ecology describes the area as '*Dense purple moor-grass with occasional heather and cottongrasses*', with which I agree and its classification as Wet modified bog. Only one *Sphagnum* species is recorded in Target Note Area 53. In 2016 I found in addition *S. subnitens*, *S. palustre* and most importantly *S. papillosum*. Overall the *Sphagna* here were low in frequency. ***In this respect there appears to be an improvement in quality of vegetation and habitat within Target Note Area 52 & 53 since the 2013 Survey.***

Turbine 2 – Target Note Areas 54

Avian Ecology describes the area as '*Mostly dense dominant heather with locally frequent hare's-tail cottongrass and common cottongrass, with patches of purple moor-grass with occasional cottongrass and heather scattered around. Lots of bare peat, area seems disturbed with evidence of fairly recent burning*'; and records the presence of two species of *Sphagnum*. In 2016 whilst some bare peat was visible, much of the area was vegetated to a greater cover. It should be noted that rather than the two species of *Sphagnum* described as present in the 2013 survey, in 2016 I found in addition *S. fallax*, *S. subnitens*, *S. palustre* and most importantly *S. papillosum*. Within the area I would describe the frequency of *Sphagna* as Occasional. ***In these respects there appears to be a marked improvement in quality of vegetation and habitat within Target Note Area 54 since the 2013 Survey.***

Turbine 3 - Target Note Area 76

Avian Ecology describes the area as '*Recently burnt and disturbed area with short vegetation and much bare peat*', and records the presence of only one species of *Sphagnum*. In 2016 whilst some bare peat was visible, much of the area was vegetated to a much greater cover; and standing water and the occasional bog pool were present – indicating wet modified bog rather than dry modified bog described in the 2013 survey. It should be noted that rather than the one species of *Sphagnum* described as present in the 2013 survey, in 2016 I found in addition *S. fallax*, *S. subnitens*, *S. palustre* and most importantly *S. papillosum*. Within the area I would describe the frequency of *Sphagna* as Occasional. ***In these respects there***

appears to be a marked improvement in quality of vegetation and habitat within Target Note Area 76 since the 2013 Survey.

(viii) APPENDIX 8 – RPS (2015) ORNITHOLOGY TECHNICAL REPORT

See 1(ii) and 3(i) Ornithology above.

In Appendix 8 I have major concerns over their assessment of the validity of the BHS Register. To counter those expressed, all site and boundaries were chosen by a panel of professionally employed ecologists from Natural England, Lancashire County Council and Lancashire Wildlife Trust. The Site Selection Guidelines were published in 1998, after exhaustive trialling from circa 1990. The Bird Guidelines were updated and republished on-line in 2006 after consultation. In these respects I do not consider any of the comments made by RPS to be valid.

(ix) Appendix 9 - Dinsdale Moorland Services (2013) Peat Restoration Report

I concur with Dinsdales Moorland Services over the Ecosystem Services provided by Blanket bog, from CO₂ sequestration and storage to flood elevation. It therefore follows that BwD Borough Council needs to give the highest level of protection to such habitats against potential damage.

Whilst I have the greatest respect for the expertise of Dinsdales Moorland Services in moorland re-wetting, I have major concerns over the images used in the report (not being Hoddlesden Moss), which give the impression that such major works are needed on Hoddlesden Moss; this is far from the case.

In the summary of results it states that 'the majority of the site would benefit from a habitat management plan'. Surely such management is in hand already through the UK Government's advisory organisation, Natural England, and Higher Level Stewardship.

The Dinsdale report acknowledges there is an abundance of dead vegetation on the site posing a fire risk, however, it is the self-same dead plant material which contributes to peat formation, a function of 'active' bogs.

The long-term sustainability of cutting fire-breaks is questionable. Any re-wetting, if accomplished well, should make the bog so wet as to inhibit the spread of fires. The proposal to create sizable scrapes for wader habitat is also questionable and has implications for CO₂ release particularly if the moss is insufficiently re-wetted.

I feel that more investigation/analysis is necessary if the Applicant wishes to put forward Dinsdale's measures as mitigation/compensation. In this respect BwD Borough Council needs to consider whether there is sufficient to determine the application under the basis of Paragraph 118 of the **National Planning Policy Framework**.

(x) Appendix 10 - Construction Environment Management Plan (CEMP)

Whilst the provision of an Ecological Protection Plan (EPP) following a planning approval is a pragmatic gesture for the applicant, it leaves BwD Council with little to balance the damage and loss of an internationally important habitat with the unquantified measures outlined by the three bullet points. BwD Council cannot accept these as components in the mitigation/compensation for the loss. Strong and robust Planning Obligations are required to include long-term management (i.e. the life of the wind farm plus at least a further 25 years following de-commissioning).

In terms of construction, the need for an Ecological Clerk of Works is agreed. However, such a person should be employed on a five days per week basis, and not be employed by the applicant. Rather the Ecological CoW needs to be in the direct employment of the Borough Council and be empowered to stop all works if there are ecological matters requiring such action.

(xi) Appendix 11 - Ecological Protection Plan

The inclusion of a draft Ecological Protection Plan is welcomed, this will need to be significantly strengthened through planning obligations in the event that BwD approves the development. However, this option should in reality not arise.

4. Conclusion

I feel that there are sufficient ecological grounds for BwD Borough Council to **refuse** this application, based upon provisions in the NPPF, the Habitats Regulations 2010 (as amended)/EC Habitats Directive and the NERC through its Biodiversity Duty. I also feel that **refusal** is necessary to conserve the integrity of the WPMs as a recreational destination in terms of landscape.

Neither do I feel is there adequate provision of mitigation/compensation to balance the biodiversity loss; and there is adequate agricultural/equestrian pasture land in upland Lancashire of low biodiversity value for the avoidance of important semi-natural habitat. These two points also warrant **refusal**.

Yours faithfully,

P. Jepson CEcol, CEnv, FCIEEM, MSc.
Chartered Ecologist and Chartered Environmentalist.

Rokeby
61 Earnsdale Avenue,
DARWEN,
Lancashire,
BB3 1JR
3rd March 2017

FAO Kate McDonald,
Development Management Team,
Blackburn with Darwen Borough Council,
Town Hall
Blackburn,
BB1 7DY.

Dear Ms MacDonald,

Planning Application: 10/16/0704: Reconsultation.

Full Planning Application

Installation of 3 wind turbines, hub height of 46m, to tip height 76.5m, to include all ancillary works at Hoddlesden Moss, Hoddlesden, Darwen.

1. OVERVIEW

Thank you for the opportunity to make further comments to the additional documents submitted in relation to the above planning application. Having read and considered the Ecological documents forming part of this consultation, **I wish to re-iterate my objection to the proposed development on Hoddlesden Moss.**

The following comments should be seen as additional to my previous objection and comments dated the 2nd August 2016. In these earlier comments I state that the habitat of Hoddlesden Moss is Blanket bog, a habitat of international importance. At that time Hoddlesden Moss carried a local designation (Biological Heritage Site). The notification of the West Pennine Moors, including Hoddlesden Moss, on the 17th November 2016 as a **Site of Special Scientific Interest** recognises the importance and elevates the Moss to a higher status in terms of Planning Policies. The notification is an affirmation of my previous comments and my assertion that the habitat of Hoddlesden Moss as Blanket bog/mire is of international importance.

Within the re-consultation material I find nothing to suggest the Applicant has presented anything further to show 'Avoidance', only providing mitigation/compensation not commensurate to the damage to an internationally important habitat.

The material recently submitted by the Applicant forming the basis for this re-consultation seeks to demonstrate that Hoddlesden Moss is in a poor state, is not 'active' bog and that it is in unfavourable condition, even claiming that it is in unfavourable declining. However, I **completely disagree** with that view; which I base upon my +40 years local experience of Blanket bog and site visits to Hoddlesden Moss on the 10th November 2013, 18 July 2016 and 20th February 2017. I would agree that Hoddlesden Moss, like much of the South Pennines, is in unfavourable condition, but most importantly, it is my opinion that the condition of Hoddlesden Moss is **Unfavourable Recovering**. In this respect its condition is regarded as positive and the imposition of the wind farm development on the moss is an unnecessary and damaging vector in ultimately achieving Favourable condition.

I make the following comments to the two Ecological documents forming part of the re-consultation.

**2. COMMENTS TO PLANTECOL REPORT
HODDLESDEN MOSS: AN ASSESSMENT OF THE CONDITION AND INTEGRITY OF ITS
BLANKET BOG HABITAT AND VEGETATION
Dr Alistair Headley**

Part 5 Conclusions to the above report make three concluding statements, over which as an Ecologist I strongly beg to differ.

1. *The plant remains in the peat and species composition and structure of the vegetation at Hoddlesden Moss shows that the blanket bog habitat is far from pristine, i.e. in a pure state without human alteration. In fact it is so heavily modified from more 'near-natural' types of blanket bog habitat found elsewhere in Britain that it has fewer species than the most degraded types of bog and heath vegetation described in the NVC.*
2. *The poor condition is not a result of current levels of grazing, but is almost certainly as a result of a long history of moor burning, air pollution (past and present), drainage and probably historically high levels of sheep grazing. Although the evidence for active drains is minimal, some drains may be hidden under the extant vegetation.*
3. *There is no evidence to suggest that any part of Hoddlesden Moss within the vicinity of the development is an 'active' blanket bog and that there are strong indications that the blanket bog habitat in the areas that was observed it was probably a net emitter of carbon dioxide.*

2.1 Comments to Concluding statement 1.

I am not aware that anyone has argued that Hoddlesden Moss is in 'pristine' condition, yet the Report makes great play over this. There are few Bogs in Britain which are truly in that state, all having been influenced in one way or another by human activities. It is true to say that Bogs in Scotland and Wales are much nearer their 'natural-state' than those in England. Indeed, it is well recognised that the whole of England's Southern Pennine uplands have suffered the impacts of pollution since the Industrial Revolution, as well as fires and drainage. Dr Headley makes much of this damage in relation to Hoddlesden Moss, but does not set his conclusions into context with the South Pennines and England itself, but towards Wales and Scotland. Regardless of the past impacts, the South Pennines is designated a Special Area of Conservation 'SAC' (a UK designation at the international level and afforded the greatest degree of protection in Law). The West Pennine Moors, along with Hoddlesden Moss, supports vegetation and habitats at least equal to those of the South Pennines, indeed none is so degraded as parts of the summits of Kinder Scout and Bleaklow which carry the highest level of (international) designation.

In his stated experience, Dr Headley, appears to have been most involved in peatlands in Scotland and Wales, rather than England, hence this may have been influencing his comparison. Hoddlesden Moss should be compared with upland bogs/peatlands in England, not with the two other parts of Britain. Here it may be noted that the UK Government's statutory advisors are divided by countries, England, Wales and Scotland, a division that serves to aid the comparing of 'like with like'.

The statement that Hoddlesden Moss carries fewer species than most degraded bog types is misleading. In the report Dr Headley states that he made a site visit on the 17th September (*note a single visit*) and was accompanied by Matthew Jackson and that **'the route of the proposed access track was walked over as well as the location of each turbine base and area of hard standing'**. It appears that the extent of the survey presented in this report was confined to this area, with assessments of Hoddlesden Moss wholly reliant upon previous surveys, i.e. Avian Ecology 2014¹. However, I recall that this earlier survey was not comprehensive, with species lists developed from random quadrats.

¹ See comments over these surveys in my previous objections

This survey method may account for the failure to list the important bog-building *Sphagnum papillosum*. During my walkover of Hoddlesden Moss in 10th November 2013, I found this important Bog-moss *Sphagnum papillosum* to be present; and on a subsequent visit on the 18 July 2016, I found this species within 20 metres of a post presumed to mark a turbine location.

Interestingly Dr Headley places no significance upon finding Lesser-Cowhorn Bogmoss (*Sphagnum inundatum*). According to data held by the British Bryophyte Society's Local Recorder, there are only two previous post 1950 records for this species in historic Lancashire south of the Ribble, that is despite searches over the last decade or so. Surely this adds significance to the value of Hoddlesden Moss.

Dr Headley makes reference to fewer species than most degraded bog types described by NVC. The use of the worded 'degraded' whilst frequently used in an ecological context, is misleading for the layperson. Modified bog is a far more meaningful term, reserving 'degraded' to describe bogs no longer carrying 'natural vegetation'. Without doubt Hoddlesden Moss carries 'natural' vegetation (here I use the term to describe vegetation that has evolved from the original so-called 'pristine' condition). The vegetation on Hoddlesden Moss is comparable to most of the South Pennine Special Area of Conservation taking into account the altitudinal difference.

In this respect I refer to the description for the South Pennine Moors SAC (international designation):

This site represents **blanket bog** in the south Pennines, the most south-easterly occurrence of the habitat in Europe. The bog vegetation communities are botanically poor. Hare's-tail cottongrass *Eriophorum vaginatum* is often overwhelmingly dominant and the usual bog-building *Sphagnum* mosses are scarce. Where the blanket peats are slightly drier, heather *Calluna vulgaris*, crowberry *Empetrum nigrum* and bilberry *Vaccinium myrtillus* become more prominent. The uncommon cloudberry *Rubus chamaemorus*² is locally abundant in bog vegetation. Bog pools provide diversity and are often characterised by common cottongrass *E. angustifolium*. Substantial areas of the bog surface are eroding, and there are extensive areas of bare peat. In some areas erosion may be a natural process reflecting the great age (9000 years) of the South Pennine peats.

The above description confirms that the vegetation on Hoddlesden Moss is comparable with much of the South Pennine Moors SAC. The added interest is that as part of the WPMs is at a lower altitude and being closer to the coast is more oceanic than the South Pennines.

In these respects the assessment presented in the Plantecol report is unsound in comparing Hoddlesden Moss with habitats in Scotland and Wales rather than bog habitat in England's South Pennines. This serves to present a skewed picture of Hoddlesden Moss to the advantage of the Applicant.

2.2 Comments to Concluding statement 2.

There is no argument over Hoddlesden Moss having suffered fire damage in the past; indeed this is not unique as most of the South Pennines Special Area of Conservation has so suffered. To belittle Hoddlesden Moss in this respect is immaterial in the overall picture. Past air pollution has been a contributing factor on Hoddlesden Moss, as it has on all lowland and upland bogs in Lancashire. However, the West Pennine Moors have suffered less in this respect than peatlands further east, due to the close proximity to the Irish Sea and the prevailing wind from that direction. Moorlands further east are ringed by big industrial conurbations of East Lancashire, Manchester, Sheffield and

² Moorland in the West Pennine Moors is too low for the occurrence of Cloudberry *Rubus chamaemorus* an arctic species found normally only over 450 metres (1,500 ft) altitude in England.

Leeds and receive pollution from which ever direction the wind blows. In recent years the cleaner air from the coast is considered to be a major factor in bog recovery in the West Pennine Moors and the increase in *Sphagna* (Bogmosses). In terms of grazing, I am not aware of any grazing of Hoddlesden Moss for at least the last fifty years.

Drainage has probably been one of the most significant vectors in modification of bogs in England, making them more vulnerable to fires. Dr Headley is correct in stating that '*Although the evidence for active drains is minimal, some drains may be hidden under the extant vegetation*'. **May** and **definitely** are worlds apart. No evidence is presented to substantiate the presence of hidden drains, although it has long been recognised that stone 'soughs' are present in several WPMs bogs. Evidence of such drains is usually present along the sides of deeper peripheral drains; however, I have not as yet seen any such evidence at Hoddlesden Moss.

Here again the conclusion reached in the Plantecol report is weak and fails in a comparison within the South Pennines.

2.3 Comments to Concluding statement 3.

The statement made '*There is no evidence to suggest that any part of Hoddlesden Moss within the vicinity of the development is an 'active' blanket bog*' is interestingly worded; as it does not suggest that the whole of Hoddlesden Moss is inactive. Further, I use the term 'active' differently than Dr Headley, as I follow that of JNCC (as stated in my previous objections).

'Active' is defined as supporting a significant area of vegetation that is **normally peat-forming**. Typical species include the **important peat-forming species**, such as bog-mosses *Sphagnum* spp. and cottongrasses *Eriophorum* spp., or purple moor-grass *Molinia caerulea* in certain circumstances, together with heather *Calluna vulgaris* and other ericaceous species. Thus sites, particularly those at higher altitude, characterised by extensive erosion features, may still be classed as 'active' if they otherwise support extensive areas of typical bog vegetation, and especially if the **erosion gullies show signs of recolonisation**.

The most abundant NVC blanket bog types are:

- M17 *Scirpus cespitosus* – *Eriophorum vaginatum* blanket mire
- M18 *Erica tetralix* – *Sphagnum papillosum* raised and blanket mire
- M19 *Calluna vulgaris* – *Eriophorum vaginatum* blanket mire
- M20 *Eriophorum vaginatum* blanket and raised mire
- M25 *Molinia caerulea* – *Potentilla erecta* mire.

JNCC (2005), The Habitats Directive: Selection of Special Areas of Conservation in the UK, JNCC Report 270.

<http://www.jncc.gov.uk/ProtectedSites/SACselection/habitat.asp?FeatureIntCode=H7130>

What matters is that the vegetation is **capable** of forming peat, whether or not it is currently doing so is **irrelevant** in terms of the definition; this is based upon the presumption that peat formation was probably never continuous historically, with periods of no laying down of peat or even periods of peat loss.

There is no doubt in my judgement that Hoddlesden Moss overall fulfils this definition. Certainly at my second visit to the turbine locations on the 18th July 2016 it was apparent that there had been an observable natural recovery of the vegetation from the last fire. This was further evident on my subsequent visit on the 20th February 2017 when I observed *Sphagna* (Bogmosses) to be frequent to locally abundant within parts of the application area. Without the imposition of the proposed development I have little doubt that this recovery will continue.

In terms of areas with Purple Moor-grass (*Molinia caerulea*) dominated vegetation on Huddlesden Moss, the assessments presented by the Applicant are generally disparaging over this vegetation type. However, my observations in the WPMs over more than thirty years paint a different picture. This is described in the paper I presented to the National Trust and Natural England conference in 2015.

Jepson, P. (2015) *Long-term observations of Molinia caerulea (Purple Moor-grass) dominated Blanket mire in the West Pennine Moors and statutory designation*. National Trust (ed. Meade, R), 2015. *Proceedings of 'Managing Molinia?'* A conference held in Huddersfield in September 2015 to highlight issues and solutions around the dominance of *Molinia caerulea* on upland peat. Available at <https://www.nationaltrust.org.uk/marsden-moor-estate/documents/managing-molinia.pdf>, accessed 19th February 2017.

Here I describe how *Molinia* tussocks act as a structural host for Bog-moss (*Sphagnum*) and how it is eventually over-topped and suppressed by the bog-moss growth. I also demonstrate initial accumulation of *Molinia* leaf-litter and its role in initiating peat formation. Hence, the Applicant's surveys should, far from describing this vegetation in deprecating terms, recognise its potential in natural bog recovery.

The 17th September assessment by Dr Headley suggests that the peat is relatively dry. This is perhaps best explained by scrutinising rainfall figures in the previous three months. Precipitation was generally low except for the short period from the 19th -22nd August. On the three occasions I have visited the application area I have observed the **bog surface to be wet**, noting standing water, known as bog-pools, particularly evident around Turbine location 2.

I therefore strongly disagree with the Plantecol report and re-iterate my previous objection, in this respect. I am of the opinion that the blanket-bog at Huddlesden Moss is indeed 'active' under the terms of JNCC, and that the vegetation is capable of favourable recovery without intervention on the back of the proposed development. I also feel that the construction of the wind turbines would be damaging to the integrity of the whole moss.

2.4 JNCC Common Standards Monitoring

The Plantecol report presents in its Table 2 the results of an assessment of the condition of the blanket bog habitat at Huddlesden Moss using the JNCC Common Standards Monitoring guidance for Upland Habitats, and with cells highlighted in orange indicating failed target.

The CSM is intended as a 'quick' method of assessing the condition of habitats; it is not an exact procedure and is open to individual interpretation. Sadly, the raw data is not fully presented but from Table 2 it appears that there were just three samples.

The CSM requires 10 to 20 sample quadrats, but most importantly it is stated, on page 44 under General notes and qualifications, relating to Blanket bog that **'When assessing frequency or cover within the vegetation, exclude all bare rock and recently burned ground from the assessment. Recently burned areas can be recognised by the presence of loose charcoal on partially burnt stems that easily produces black marks on fingers and clothes (it takes two to three years for charcoal to be weathered from stems)'**.

It is quite apparent in the area around Turbines 2 and 3 that the habitat had been burnt some years previous, as charred stems of Heather were clearly visible on my visit in 2013 and to a lesser extent in 2016. I am informed that the last wildcat fire on Huddlesden Moss was 2005; the vegetation around Turbines 2 and 3 was shorter than elsewhere but I cannot state that this is a result of a later burn. It may be attributable to combinations of seasonally waterlogging and desiccation of bare peat and/or the ravages of Heather Beetle.

Notwithstanding this, quadrat data collected by me on the 21st February 2017 paints a very different picture of the vegetation condition to that presented by the Applicant (see my assessment below).

Assessing the various reports submitted and based upon my observations, I conclude that the Plantecol assessment is unsound.

**3. COMMENTS TO THE CAPITA REPORT :
HODDLEDEN MOSS MOORLAND RESTORATION ENHANCEMENT STRATEGY
NOVEMBER 2016
NEIL PAGE**

Section 1 of this report makes the statement that; *'The baseline condition of the whole Hoddlesden Moss site subject to this report is considered to be in unfavourable declining condition based on the assessment of PlantEcol 2016 and the site walkover undertaken in November 2016 by Capita ecologist'*,

However, both the Plantecol survey and the Capita walkover were restricted to the footprint of the proposed development, so I am at a loss as to how their statement can claim to cover the **whole** of Hoddlesden Moss. Moreover, I am at a loss over the Capita assertion that the 'baseline condition' of the **whole** of Hoddlesden Moss is 'unfavourable declining'. There is nothing presented to show how Capita arrived at this opinion.

Certainly the Plantecol assessment, using the JNCC Common Standards Monitoring, may have inadequately considered the condition of Hoddlesden Moss as 'unfavourable' (see above) and in that set a baseline, but to determine 'unfavourable declining' or 'unfavourable recovery' requires a comparable survey nominally six years later (or sooner if there are issues over condition).

On that basis the walkover survey of Capita, restricted to the proposed development footprint alone and involving such a short date interval³, the assertion that the condition of Hoddlesden Moss is unfavourable declining is grossly inadequate and extremely dubious.

Further if the Capita Report purports to mitigate/compensate for the damage/loss of blanket bog habitat, then I consider that proposed to be grossly inadequate. It most certainly does not mitigate/compensate for the loss to a 9,000yr old system. Certainly a modicum of grip blocking and the planting of trees does not equate to the loss/damage to an internationally important habitat. I do not consider BwD Planning are in a position to approve this application with the mitigation/compensation on offer.

4. ALTERNATIVE ASSESSMENT OF THE VEGETATION AND CONDITION OF HODDLEDEN MOSS

Conversely to the Plantecol and the Capita assessments; based upon my knowledge of habitats in the WPMs spanning +40 years and visits to Hoddlesden Moss in connection with planning applications in 2013, 2016 and 2017, it is **my opinion that the condition of the moss is at the least Unfavourable Recovery**. This concurs with Natural England's assessment for part of the Moss.

It should be recognised that the last wildcat fire (probably arson) was in 2005 at which time much of the vegetation would have been severely damaged. The vegetation on the site represents circa 11

³ September to November 2016

years of recovery. In this respect it cannot be expected to compare with near pristine bogs of Wales and Scotland as presented in the Plantecol report.

The assessment made by Plantecol and Capita that the habitat is in poor condition is not corroborated by my visits and latest walkover.

Quadrat Survey on the 21st February 2017

During a walkover on the 21st February 2017, the plant species in twelve 4m² quadrats were recorded within or adjacent to the development site boundary and the results presented in Appendix 1.

Of particular note is the total of **nine Sphagna** species recorded in the quadrats, contrasting with the few vascular plant species. In terms of the Indicator Species in the Common Standards Monitoring (used by Plantecol) where a threshold of 6 such species is required for Favourable Condition. In my survey (see Appendix 1) **Six Indicator species occurred in 6 of the quadrates**, with two quadrats with 8 indicators, and with the two lowest with 4 indicators each. As advised by Natural England the generic term 'Pleurocarpous mosses', is taken to include *Hypnum jutlandicum* as an Indicator.

Species composition of vegetation

Whilst the vascular plants recorded in the quadrats are few, mainly Heather, Cottongrasses and Purple Moor-grass, the moss and liverwort flora more than compensates. Nine species of *Sphagna* (Bogmoss) were recorded; adding the *Sphagnum inundatum* found by Dr Headley, this makes a most impressive count of at least **ten Sphagnum species on Hoddlesden Moss**, more than twice as many as typically found in the South Pennines SAC⁴.

In addition the record of *Sphagnum tenellum* is the first in the West Pennine Moors. It would appear there are few if any recent records for the South Pennines, so must therefore be considered an extremely rare species within that context.

The Liverwort *Odontoschisma sphagni*, is of major significance as the last fully documented records in South Lancashire VC59 are from the southern lowland mosses in the mid 1970s (M.Newton); (there are records dated 1989 from SD81 and SD92 but no recorder/determiner is specified). *Cephalozia connivens* has two recent records, both from the southern mosses of South Lancashire; and *Lophozia incisa* with only four recent records. These species were identified by the British Bryophyte Society Recorder covering S. Lancashire and Cheshire, and he states in correspondence, "*L. incisa* and *O.sphagni* are prominent liverworts unlikely to be overlooked and undoubtedly scarce in VC59. I have been specifically searching for the latter for years".

Clearly, the assessments submitted by the Applicant to support the proposed development undervalues Hoddlesden Moss as a biodiversity resource, a Site of Special Scientific Interest and Internationally important habitat.

⁴ Following research for Oswaldtwistle Wind Farm that indicated that 4-5 species typically occurred per 2km square on the OS grid in the South Pennines.

5. CONCLUSION

I conclude, based upon policies in BwD Development Plan and those in the National Planning Policy Framework, I urge Blackburn with Darwen Borough Council to refuse Planning Application 10/16/0704.

- The windfarm development on Hoddlesden Moss would cause a loss to the total area of Blanket bog and impact potentially adversely upon the remainder. Blanket bog, is a priority habitat listed in the EC Habitats Directive and is a Section 41 Habitat of Conservation Importance in the NERC Act, under which local authorities have an obligation to protect.
- It is made clear in the National Planning Policy Framework that: *"Proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any other broader impacts on the national network of Site of Special Scientific Interest"*. In this respect BwD as the planning authority needs to place considerable weight behind the advice from Natural England in their decision. I see no other option than refusal.
- In my previous objections and again here in this objection, I do not consider the proposed mitigation/compensation adequate, neither has 'Avoidance' been satisfactorily demonstrated. NPPF dictates a hierarchical approach of Avoidance – Mitigation - Compensation. It may be claimed that the SSSI notification postdates the planning application, the designation had been on the cards since 2007 and was widely known. In any case Hoddlesden Moss was designated a BHS from the early 1990s, the hierarchical approach of Avoidance , Mitigation and Compensation still applied. I am of the view that the mitigation/compensation offered is nowhere near proportional to the loss and damage to the Moss.
- Hoddlesden Moss is in a state of Recovery, whilst lacking certain vascular plants, its *Sphagnum* (bogmoss) flora is diverse with at least 10 species. *Sphagna* are well distributed across the Moss and where they are locally frequent to locally abundant.

Yours faithfully,

P. Jepson CEcol. CEnv. FCIEEM.
Chartered Ecologist.

Appendix 1 Hoddesden Moss Walkover Assessment.

Surveyor: P.Jepson CEcol.CEnv.FCIEEM with bryophytes determined by Dr J. Lowell, British Bryological Society VC Recorder for S. Lancashire and Cheshire.

Quadrates data taken during a site walk over on the 21st February 2017.

Survey duration circa 2 hours (10.30 am to 12.30am), survey abandoned when thick wet mist began to roll-in

Weather conditions: dull but dry prior to mist.

Ground conditions: variable, moist to wet with localised standing water present.

Notable species in bold

- Indicates an Indicator Species JNCC Common Standards Monitoring

Species	Location					
	1	2	3	4	5	6
	SD 7307221316	SD 7303821260	SD 7287721080	SD 7291020752	SD 7291020651	SD 7287120553
○ Heather <i>Calluna vulgaris</i>	LD	D	A	O	R	O
○ Common Cottongrass <i>Eriophorum angustifolium</i>	R	F	A	R		F
○ Hare'-tail Cottongrass <i>Eriophorum vaginatum</i>	F	O	R	O		A
Purple Moor-grass <i>Molinia caerulea</i>	D	R	O	D	D	A
<i>Calypogeia muelleriana</i>						present
<i>Cephalozia connivens</i>						present
○ <i>Hypnum jutlandicum</i>			F			F
<i>Lophozia incisa</i>						present
<i>Odontoschisma sphagni</i>						present
<i>Polytrichum commune</i>						R
Bogmoss <i>Sphagnum</i> species comprising:	A	LD		A	LD	F
○ <i>S. denticulatum</i>		present				
○ <i>S. capillifolium</i>	present					present
○ <i>S. cuspidatum</i>						
○ <i>S. fallax</i>	present		present		present	
○ <i>S. fimbriatum</i>	present					present
○ <i>S. palustre</i>	present			present		present
○ <i>S. papillosum</i>					present	
○ <i>S. subnitens</i>	present	present		present	present	
○ <i>S. tenellum</i>						
	Small grip, naturally infilling with vegetation, some standing water			Close to post, presumed location of proposed Turbine 1		Close to post, presumed location of proposed Turbine 2
CSM Qualifying Species	8	5	5	5	4	7

* Grid reference may have been corrupted at beyond 6 figures – to be checked in field when the opportunity permits.

Species	Location					
	7	8	9	10	11	12
	SD 7285720533	*SD 7285620539	SD 7291520339	SD 7285920301	SD 7280920436	SD 7270820670
○ Heather <i>Calluna vulgaris</i>	F	O	A	A	O	A
○ Common Cottongrass <i>Eriophorum angustifolium</i>	O	F	F	A	F	F
○ Hare's-tail ottongrass <i>Eriophorum vaginatum</i>	A	F	F	F	A	F
Purple Moor-grass <i>Molinia caerulea</i>	R	F			R	R
<i>Calypogeia muelleriana</i>						
<i>Cephalozia connivens</i>						
○ <i>Hypnum jutlandicum</i>	R			R	LF	O
<i>Lophozia incisa</i>						
<i>Odontoschisma sphagni</i>			present			
<i>Polytrichum commune</i>	R					
Bogmoss <i>Sphagnum</i> species comprising:	LD	F	LD	LD	LD	A
○ <i>S. denticulatum</i>						
○ <i>S. capillifolium</i>	present		present			
○ <i>S. cuspidatum</i>		present				
○ <i>S. fallax</i>				present	present	
○ <i>S. fimbriatum</i>					present	
○ <i>S. palustre</i>	present					
○ <i>S. papillosum</i>					present	present
○ <i>S. subnitens</i>				present	present	present
○ <i>S. tenellum</i>		present				
	Close to post, presumed location of proposed Turbine 2, Sphagnum hummock c 1.5metres across	Standing water present. Close to post, presumed location of proposed Turbine 2,	Close to post, presumed location of proposed Turbine 3,	Substantial Sphagnum hummock Near to post, presumed location of proposed Turbine 3,	Sphagnum hummock c 1metre across	
CSM Qualifying Species	6	5	4	6	8	6

Bob Britnell – Planning Consultancy

planning and conservation advice

28 Orchard Close, Canterbury, CT2 7AL

e-mail bobbritnellplans@hotmail.co.uk tel: 01227 456648

Planning Dept,
Blackburn with Darwen Borough Council
Lower Ground Floor
Town Hall
King William Street
Blackburn BB1 7DY
Date: 1st March 2017

Letter of objection: application 10/16/0704
Erection of three wind turbines between Broadhead Road and Roman Road at
Hoddlesden Moss, Hoddlesden, Darwen

1. INTRODUCTION

1.1 This letter of objection is on behalf of Mrs I Syddall and Ms N Syddall who occupy two properties at Lower Giles, at the western end of Knowsley Lane, Edgworth. Knowsley Lane runs down hill westward from The Broadhead Road at the Toby Inn, almost to the Broadhead Brook; from the Broadhead Brook land rises upwards to the west and north-west to the top of what is referred to in the application as "Soot Hill" and the location of the proposed three turbines. From the properties of Mrs and Ms Syddall the turbines will be dominant features on the hilltop above their properties and clearly visible in the outlook from their windows and garden. The turbines will be equally if not more visible from the other properties of Knowsley Lane, which are uphill to the east of Lower Giles towards the Broadhead Road.

2. COMMUNITY ENGAGEMENT

2.1 Given the proximity of these properties to the turbine application site it is surprising that none of the Knowsley Lane properties were advised of the planning application which is now more than six months old; the fear is that these properties and the impact upon them has been totally overlooked both by the applicants in devising their proposals and by the Council in assessing them.

2.2. It is clear from the applicants submission that their "community engagement" did not extend to properties outside the immediate Hoddlesden, Waterside and Pick-up Bank areas and neither residents of, nor the Parish Council of North Turton were consulted or even informed of the proposals by the applicants; this is a serious oversight and totally undermines the applicants claim to have community support for the proposals. The submitted documents suggest that the public consultation that did take place was as long ago as 2013 and that really cannot be relied on as being valid in 2017.

3. VISUAL AMENITY

3.1 Whilst a photograph and visualisation have been provided to "demonstrate" the visual impact of the proposed turbines, including a photograph taken from Broadhead Road close to The Toby Inn such things are notoriously misleading as the eye does not perceive in the same way as a camera and the camera cannot capture the visual impact of turbines in motion with the revolution of the blades making turbines much more noticeable visually. The reality of the situation here is that three

huge towers with revolving blades would be a dominant hilltop feature detracting from the unspoilt outlook, character and nature of Hoddlesden Moss and Soot Hill.

3.2. Whilst no-one has a "right to a view" this is not about loss of a private "view" but about a gross intrusion on a public view of an unspoilt moorland hill. This is an important issue as a present this area between the M61 and the Grane Road is largely unspoilt by structures of the scale and magnitude of wind turbines. The presence of the turbines to the east of the Grane Road demonstrates just what a deleterious visual impact turbines can have on a wide area of landscape. It is probably worth noting at this point that the three turbines proposed do not extend the full length of this moorland ridge and on plan at least it would appear that further turbines could be added southwards at limited cost as the service road and infrastructure would be in place.

4. LOCAL PLANNING POLICY

4.1 Before commenting in detail on the planning policy issues that arise from the application it must be noted that the proposal refers consistently to the last, but now superseded version of the Borough Local Plan, quoting policies therefrom that are now overtaken by changes made; this is perhaps as a result of the applicant merely rehashing their previous submission with additional material limited to specific issues; changes in planning policy are therefore not reflected in this submission. In assessing compliance with planning policy regard has been had to the Landscape Strategy for Lancashire, the Blackburn with Darwen Local Plan Part 1 Core Strategy and Part 2 dealing with development management and to the National Planning Policy Framework and the associated National Planning Practice Guidance suite.

4.2 The Landscape Strategy identifies the site as within the West Pennine Moors with a Moorland Hills designation; within such an area it indicates that development such as this "can be intrusive" if a "cluttered skyline" is created and as a guiding principle that local distinctiveness should be recognised and enhanced. The hill is currently uncluttered, its bare top forming a characteristic and distinctive moorland feature that would be lost if turbines were erected on it; the proposal is therefore clearly contrary to the aims and ambitions of the Landscape Strategy for Lancashire.

4.3 Policy CS18 of the Borough Core Strategy states at part 2
"The key features of landscapes throughout the Borough will be protected. Development likely to affect landscapes or their key features will only be permitted where there is no unacceptable adverse impact on them. The level of protection afforded will depend on the quality, importance and uniqueness of the landscape in question."

And Part 2 of the Local Plan further states in policy 41

"Development will be permitted provided there is no unacceptable impact on landscape character or the principal traits associated with it."

It is self evident that introducing three giant wind turbines on to the top of this unspoilt hilltop will have an unacceptably adverse impact on the character of the landscape and the proposal is thus demonstrably contrary to the Local Plan.

4.4 Policy CS18 of the Borough Core Strategy states in part 3,
"The active use of the Borough's landscapes through leisure and tourism will be promoted where this is compatible with objectives relating to their protection."

And Part 2 of the Local Plan further states in policy 34

"Tourism-based development will be granted planning permission, with priority given to the following locations:

ii) the West Pennine Moors as defined on the Adopted Policies Map for uses associated with the recreational use of the Moors. All recreational development

must be sensitive to the natural environment that is the tourism asset of the West

Pennine Moors;

Again, it is self evident, imposing three large wind turbines on an unspoilt hilltop in the West Pennine Moors is going to undermine the Council's strategy of encouraging tourism and the related tourist spend into the local economy. The area where the turbine towers are proposed is criss crossed with public footpaths giving access for town dwellers and visitors to the unspoilt beauty of the moors; the presence of the proposed turbines would impact adversely on the areas recreational potential. The proposal is thus again demonstrably in conflict with the Local Plan and Core Strategy.

4.5 The Council has adopted a specific policy in Part 2 of the Local Plan with regard to wind Turbines, policy 37: this states at the outset,

"1. Wind turbine development will be permitted where it complies with all of the following criteria:"

It is notable that the policy requires compliance with all the following criteria, however it falls at the first hurdle:

i) the development has no unacceptable adverse visual impact and does not unacceptably undermine the character of the landscape;

As set out above the proposal would have a seriously adverse visual impact and would undermine the character of the landscape; it falls again at the ninth and tenth hurdles:

ix) the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and

x) following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.

There is no Local or Neighbourhood Plan that has identified the area as suitable for wind energy development and, in any case, the consultation with the "local community" was very restricted and ignored people like the residents of Knowsley Lane who will be seriously adversely affected by the proposal; they simply were not consulted, let alone had their concerns addressed and they certainly do not back the proposal. The proposal is therefore contrary to policy 37 of the Local Plan.

5. NATIONAL PLANNING POLICY

5.1 Identifying the conflict with the adopted Local Plan Part 2 and Core Strategy documents is important as the National Planning Policy Framework makes clear in paras 2, 11 and 196 that development decisions should be made in accordance with an adopted Local Plan where it is up to date, as in this case. Para 7 of the NPPF indicates that there are three important strands to sustainable planning and that these are to be held in tension, no one trumping the other, these are economic, social and environmental strands and the conservation and enhancement of the natural environment is one of the core planning principles set out in Para 17; the environment and its protection is thus a fundamental and important part of planning as seen by the Government.

5.2 Elsewhere in the NPPF Para 109 refers to the need to conserve and enhance natural and local environments and particularly to protect and enhance "valued landscapes"; although valued landscapes are not defined as such, there can be no doubt that this landscape, which is designated as a specific landscape character area, moorland hills and the West Pennine Moors, fits the picture of such a "valued landscape", were it not it would not have received the extra layer of protection that such designation affords it.

5.3 Furthermore Para 123 of the NPPF indicates that areas of tranquillity that are relatively undisturbed by noise should be identified and protected as such areas are prized for their amenity and recreational values. As stated above this moor is such an area, crossed by public footpaths and close enough to major urban areas to provide an opportunity for town and city dwellers to enjoy a break in the countryside, even if only for a day or so.

5.4 The National Planning Practice Guidance suite offers specific advice in respect of renewable and low carbon technology stating that **“in the case of wind turbines a planning application should not be approved unless the proposed development site is an area identified as suitable for wind energy development in a local or neighbourhood plan”**. Furthermore it states, **“the need for renewable or low carbon energy does not automatically override environmental protections”** and **“local topography is an important factor in assessing if the effect on the landscape is damaging”** and finally, **“protecting local amenity is an important consideration”**.

6. CONCLUSION

6.1 As the Council's Local Plan Part 2 and Core Strategy clearly reflect the national framework and practice guidance and as the development is demonstrably contrary to the Local Plan and Strategy it follows that the proposal must be contrary to the National Framework and Guidance. The NPPF is clear and repeats that development decision making should follow adopted planning policy and as this proposal is so clearly contrary to adopted policies, both national and local, it follows that the proposal should be rejected and the moorland safeguarded.

R T Britnell FRICS
01 Mar 2107

Anthony Wild

Orrell Cote Barn, Moorside Road
Edgworth, Bolton. BL7 0JZ

1st August 2016

Kate McDonald,
The Lead Planning Officer,
King William Street,
Blackburn,
BB1 7DY.

Dear Ms. McDonald,

Re: Planning application number 10/16/0704: site address: Hoddlesden Moss, Hoddlesden, Darwen.

I wish to register an objection to the above application. My grounds for objection are as follows:

1. The development would have an unacceptably adverse impact upon the key characteristics of the surrounding landscape. The turbines are 76.5 meters high and would create a complete blight on the skyline from many directions.
2. I consider that the turbines would be too close to several nearby properties, taking account of their size.
3. The area of the proposed development is currently under consideration for being designated as a 'special scientific site of interest' by Natural England.
4. In my view, the sound report is incomplete. The site is approximately equidistant from both the Roman road and Broadhead Road. No sound assessments have been considered for the many properties on the Broadhead Road side of the proposed turbines e.g. Longshoot Barn Cottage and Higher Pasture Farm. The prevailing wind blows from the west and these properties are likely to receive more noise on most occasions than those to the west of the site, to which the sound reports relate.

Sound can travel differently depending on the lie of the land: and in Scotland, which is the U.K.'s main venue for wind farms, the recommended distance of large turbines from residential properties is a minimum of 2km.

5. I am concerned with access to the site. The size and weight of each turbine being transported is likely to cause damage and inconvenience users on the narrow access roads and also to cause irreparable damage to the important natural flora and fauna of the moorland.

6. *I have obtained information relating to the accounts of Viridis Wind Turbines (Global) Limited as at 31st December 2014. These show assets of £16,127 and liabilities of £90,755. Debt exceeds assets by £74,628. The applicant has agreed to give certain undertakings to the Council, the Parish Councils and others. No evidence is available to support the applicant's ability to meet these obligations. This is of serious concern and I would respectfully suggest that in the event that the Council are mindful to grant the application, that prior to doing so they take out credit reports on Viridis and the appropriate sureties be obtained.*

Yours Sincerely,

James Anthony Wild

West Cottage
Ryecroft Lane
Belmont
Bolton
Lancashire
BL7 8AH

Kate McDonald,
Planning Team Leader (Implementation)
Planning Services
Planning and Prosperity
Blackburn with Darwen Borough Council
Town Hall
Blackburn
BB1 7DY

2nd March 2016

Dear Ms McDonald

Re: Planning Application 10/16/0704 (amended) – Three wind turbines and ancillary works at Hoddlesden Moss, Darwen

I wish to register my **objection** to the amended proposal to erect three wind turbines and ancillary works at Hoddlesden Moss, Darwen. Since my previous letter of objection (dated 28th July 2016) to the original proposals, a major development has been that Natural England (NE) notified the West Pennine Moors SSSI on the 17th of November 2016 under section 28C of the Wildlife and Countryside Act 1981. I know that you are acutely aware of the notification and the legal consequences of it.

I feel able to comment with authority on the birds of the West Pennine Moors (WPM) having been consulted on the original designations and assemblage criteria of Avian BHS's within the WPM by Lancashire County Council from 1992 onwards. Furthermore, I was co-author of *The Birds of Lancashire* (White et al 2008)¹ the 'Lancashire Bird Atlas' (*The State of Lancashire's Birds: 2007-2011* (White et al 2013)², the annual Lancashire Bird Report since 2006 plus have contributed further within other works of reference in relation to the birds of the WPM. I have carried out ornithological survey and consultancy/advisory work in the WPM for over 20 years for clients including United Utilities plc, the Forestry Commission, Bolton Metropolitan Borough Council plus independent consultants. Additionally, Dr Tim Melling and I produced the text on birds for the *Conspectus for Statutory Designation (SSSI)* for the West Pennine Moors to Natural England in 2007.

¹ *The Birds of Lancashire and North Merseyside* – White et al 2008

² *The State of Lancashire's Birds: An Atlas Survey 2007-2011* – White et al 2013

Hoddlesden Moss qualifies as a Site of Special Scientific Interest (SSSI) under the *upland moorland and grassland without water bodies* breeding bird assemblage of the JNCC Guidelines for the Selection of Biological SSSIs, hence why Hoddlesden Moss is included within the West Pennine Moors SSSI. The breeding bird assemblage of the SSSI of Hoddlesden and Aushaw Mosses lying within the 2km buffer of the proposed development includes many species listed in SPA Annex 1, Birds of Conservation Concern (BoCC4) Red-list, BoCC Amber-list plus Schedule 1 Licence listed species in addition to species listed in the SSSI Site Selection guidelines.

This list (updated to include the 2016 breeding season) includes *Peregrine, Merlin, Short-eared Owl, Long-eared Owl, Teal, Raven, Cuckoo, Curlew, Grey Partridge, Linnet, Lapwing, Golden Plover, Dunlin, Red Grouse, Snipe, Wheatear, Stonechat, Skylark, Lesser Redpoll, Willow Warbler, Meadow Pipit and Reed Bunting*.

This is an impressive list which serves to illustrate why Hoddlesden Moss is a key component part of the SSSI and therefore of national significance.

Following the notification of the SSSI, NE was re-consulted by Blackburn with Darwen Borough Council (The Council), and NE's response to consultation in a letter dated 3rd February 2017 states:

- *the proposed development would result in loss of and impacts on blanket bog, an Annex 1 Priority Habitat of European importance and notified interest feature of this SSSI. It would also be likely to have significant impacts on the breeding bird assemblage for which the SSSI is notified*
- *the planning policy context (NPPF paragraph 118) is clear that: "Proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any other broader impacts on the national network of Site of Special Scientific Interest". Therefore, in weighing benefits and impacts as part of the decision making process, the LPA should take into account Natural England's advice that an adverse effect on the site's notified features is likely*
- *as per our previous advice, the proposals have not properly considered the mitigation hierarchy. This would include consideration of alternative locations, the scope to fully mitigate impacts, and the need for off-site compensation for loss of notified habitat. It is our view that it would be very challenging to successfully mitigate the impacts of this scheme at this location*
- *enhancement should be considered separately to the mitigation hierarchy. As per our previous advice, it is our view that large-scale enhancement is not required and would be unlikely to be beneficial to the overall condition of the site. Moreover, the proposed enhancement could have a further negative impact through effects on hydrology and damage to the bog. The notification of the West Pennine Moors as a SSSI provides the best possible mechanism for the Hoddlesden Moss site to recover and achieve a favourable condition status through sensitive management on the site in conjunction with owners and occupiers*

Furthermore, the NE letter clearly states "*Natural England maintains an objection to this proposal on the grounds that it is likely to damage or destroy the interest features for which the West Pennine Moors SSSI has been notified*".

All the above statements by NE, the Government's advisory body on England's natural environment, are absolutely firm, clear and unambiguous. Therefore any application, such as this, that constitutes an adverse impact on both priority habitats and upland priority breeding birds should clearly be refused.

The applicant's revised submission states (in 'Additional Info Sheet', page 5, 'Breeding Bird Surveys') that two additional bird surveys were undertaken by the applicant's consultant, on the 22nd and 23rd April 2016. However, the detailed bird survey data for those two days is not made available or included within the additional documents. The lack of this information, and additionally of a Winter Bird Survey, I find most wanting and remiss and I can see no genuine reason why the applicant would not produce this information, given the request from Council for such, in the pre-application response dated 23rd July 2015.

I have cause for concern over the methodology of the breeding bird surveys employed by the developer as these have led to the apparent absence of several key species and suppression of recorded numbers of other species. The 2013 Ornithological Survey was limited in the area it covered (only 500m from the proposed turbines) and did not include the vital dawn/dusk visits, with the 2014 Ornithological Survey also not including any dusk visits. The absence of dawn and dusk visits leads to under-recording of species like Snipe and Short-eared Owl. However, it is the 2015 Ornithological Survey that is found most wanting. The surveying in 2015 did not start until late June (23rd June). This is at a time when any breeding bird survey should be nearing completion as many early/failed/elusive species will have already left the site or no longer be evident to surveyors. This gross failing in the developer's 2015 Survey unfortunately renders the 2015 data, and any conclusions drawn from that data, unsafe. This is amply illustrated by the fact that Short-eared Owls were present, and in all probability breeding, on Hoddlesden Moss in April 2015 (data via RSPB). Their breeding cycle was concluded and the birds had clearly moved away before the late start of the applicant's, flawed breeding bird survey.

Furthermore, the deficiencies of the developer's 2015 Survey are amply illustrated in the fact that, for example, only one Snipe territory, 2 Curlew territories and 4 Linnet territories were located. In comparison, a series of brief walkover surveys by myself during the 2016 breeding season located 7+ Snipe territories, 5/6 Curlew territories and 9+ Linnet territories. Additionally, key breeding raptor and other site 'flagship' species, present during the 2016 breeding season, were unrecorded during the developer's surveys.

The displacement of several moorland breeding bird species to wind-turbines has been demonstrated (Pearce-Higgins et al., 2009)³. Particularly affected are raptor species and several waders with, for example, Curlew avoidance of turbines out to 800m and Snipe avoidance out to 400m. This would clearly have a massive detrimental effect in displacing many species from the development site itself and up to 800m around the proposed turbines. The access track would also contribute to the displacement effect due to the inevitable increased disturbance it will generate. These displaced birds are an important constituent part (and percentage) of the West Pennine Moors SSSI population. It is also totally remiss, but perhaps not surprising, that the definitive work on the displacement of breeding birds by wind-turbines in the UK (Pearce-Higgins et al., 2009) is not referred to within the developer's application.

³ The Distribution of Breeding Birds around Upland Wind Farms - Pearce-Higgins et al 2009

The developer's Ornithological Survey Report (Desk Study) also makes an immense, and false, assumption that if a record isn't on the LERN database then the species is absent. Ornithological records are unfortunately grossly underrepresented on the LERN database which is clearly evident upon study. The developer's further statements and conclusions, drawn from the paucity of bird records on LERN, verge on the naïve, as they suggest that an absence of records equals a record of absence! This is well illustrated by reference to Short-eared Owl, which the developer states '*has only been identified twice over the last 20 years*'. This is unacceptably misrepresentative as the species is seen on essentially an annual basis (including probable breeding in 2015 and presence in 2016) and breeds regularly within the SSSI.

The mitigation and enhancement packages offered by the applicant are totally inappropriate for the scale of the ecological damage that the construction and operation of the proposed turbines/access track will bring and are unnecessary and could even be regarded as damaging. Furthermore, the advice from NE was that:

"large-scale enhancement is not required and would be unlikely to be beneficial to the overall condition of the site. Moreover, the proposed enhancement could have a further negative impact through effects on hydrology and damage to the bog. The notification of the West Pennine Moors as a SSSI provides the best possible mechanism for the Hoddlesden Moss site to recover and achieve a favourable condition status through sensitive management on the site in conjunction with owners and occupiers".

The site is already in Higher Level Stewardship and therefore 'recovering' plus large areas are believed to have never been gripped/drained. Therefore any grip-blocking could be considered unnecessary and could even be regarded as damaging to the site and the advice of NE should be heeded and this 'enhancement' dismissed. The further tree-planting mitigation is anything but compensatory as it will damage open species-rich grassland and have a totally negative affect on the immediately adjacent SSSI on Edgerton Moss. Hence, this tree-planting mitigation will have a harmful ecological impact and I find it incredible that it has even been suggested.

Whilst others will be better qualified to comment at length on other aspects of the proposal, I would like to state that the irreparable damage to the deep peat, the active blanket-bog, the remarkable ten species of *Sphagna* present plus the hydrology of the site is totally unacceptable. Active blanket-bog is an extremely valuable and scarce world resource, often described as 'Britain's rainforest' and The Council should be extremely proud to have such an internationally important habitat within their jurisdiction and have the ability to protect it through development control. There is up to 3.5m depth of peat around the proposed turbines, which will equate to it being some 3,500 years old as it grows at around 1mm per year. This will have provided some 3500 years-worth of climate benefit but if the peat is damaged this process reverses and it starts to release stored carbon becoming negative with regard to climate change. Additionally, the damage to the landscape character of the West Pennine Moors is of major concern and the turbines would additionally be highly visible at great distance, particularly to the north and south. The access track would also be highly visible, especially from the east and north, and its route so close to the summit of the moor at Grey Stone will be highly detrimental to the landscape.

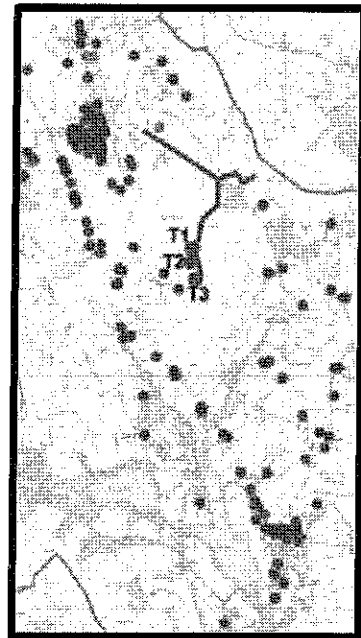
Given all of the above, I believe that the application should be rejected, as the presence and construction of the turbines plus ancillary works will irreparably damage the ecological status of the site (notified SSSI) both in terms of habitat destruction, disturbance and displacement of breeding birds with the inevitable degradation of the nationally important upland breeding bird assemblage and active blanket-bog over deep peat. Having carried out ecological surveys and consultancy throughout the West Pennine

Moors for many years I struggle to think of a more inappropriate and ecologically damaging location for a windfarm than Hoddlesden Moss.

To conclude, as Hoddlesden Moss, has now been notified as part of the West Pennine Moors SSSI, it would be extremely injudicious to grant permission for such an application to proceed given the clear advice received from NE, the Government's advisory body on England's natural environment. As you will be aware, Local Authorities also have a responsibility under Section 40 of the Natural Environment and Rural Communities NERC Act (2006), in accordance with Paragraph 118 of the National Planning Policy Framework (NPPF). The fact that the site is a notified SSSI indicates that it has nationally significant biodiversity interest. Section 40 of the Natural Environment and Rural Communities Act 2006 (as amended) places a duty on all public bodies to 'have regard to the purpose of conserving biodiversity' in exercising their functions. Therefore, the local authority should give consideration to the biodiversity value and SSSI notification of the site in order to comply with this duty.

Furthermore, as the applicant has not submitted any documentation or any reasons as to why Hoddlesden Moss is the only possible location for the windfarm, he has therefore failed at the first hurdle of the mitigation hierarchy as laid down within the NPPF. This in respect that the applicant should first address any site based issues through avoidance. Therefore planning permission should be refused.

One final point; the June 2015 Ministerial Statement on Wind Energy states that local authorities should only consider granting planning permission for wind turbines where they have been allocated within Local Plans and have community support. This proposal has neither, and the public antipathy to this proposal is overwhelming despite what the applicant states in his 'Community Engagement Report'. This is amply illustrated by The Council's Objectors and Supporters map (right) where objections to the present application are noted in red whilst supports are in green.



Yours faithfully

Stephen Martin

Donald and Sheila Bell, Stand Hill Farm Hoddlesden Darwen BB3 3QS

Registration of objection to Planning Application Reference 10/16/0704 – Installation of Wind Turbines on Hoddlesden Moss

Dear Kate –

We would like to yet again formally register our objection to the abovementioned planning proposal as we believe a further attempt is being made to resurrect the abomination and objections have to be in by 06/03/17.

Our objections are as follows :-

1) As we live at Stand Hill Farm Chapman Rd Hoddlesden BB3 3QS we believe the siting of the turbines makes them directly visible from all windows and the conservatory on the rear elevation of our property (see Appendix 14 Plan 5). Given their size and proximity we consider the turbines will be a complete eyesore and ruin what has been our long established unobstructed views of pristine moorland.

2) We believe that given there is growing evidence that cost effectiveness of wind turbines is being seriously called in to question then at least the progressing of such applications should be held in moratorium until their efficacy is proven.

Not to mention their cost in subsidies and their potential long term dismantling costs when they outlive their short life.

3) We believe the government position on wind farms is changing with several Ministers in favour of halting or at least a having a moratorium on the building of more wind farms as along with questions of their cost effectiveness they believe too little consideration has been given to the views of and impact on local/affected communities. This has been much reported in the press in with the then PM David Cameron recently saying in Lancashire

“that people should not “expect to see a lot more wind power onshore

in the UK”. “There’s a limited potential for onshore wind,” Mr Cameron said. “Frankly, we’ve got some in the UK — I don’t think we’re going to have a huge amount more. “We’ve just changed the rules, we’ve cut the subsidies and we’ve said that any schemes that go ahead have to give more benefit to local communities. So I wouldn’t expect to see a lot more wind power onshore in the UK.”

Indeed there is talk of halting of further inland Wind Farms being an Election Manifesto issue.

By the way what benefits would we/Hoddlesden see ??

4) We think our area has already contributed/suffered enough in support of the misguided Wind Farm policy in as much as the northern views from our farm are already blighted by the site of six turbines from the Hyndburn Wind Farm.

Are you trying to surround us with Wind Farms?.

5) We believe there is growing concern about the wider environmental impacts of wind farms on bird/animal and indeed public health, again numerous cities/local governments worldwide are having moratoriums whilst more evidence is collected.

6) Hoddlesden Moss has recently be declared a Site of Special Scientific Interest – surely this development should not be allowed to impinge/endanger such a site.

Along with our objection the abovementioned planning proposal we also have some serious concerns relating to the actual planning notification process used in this case.

1) Although we are in direct line of site of the proposed development and it would have a major impact on our views we've received no notification from the Council.

No notifications were put up on Chapman Rd where all properties will have a direct view of Hoddlesden Moss, we believe what we are seeing here is effectively Planning By Stealth – given the size of the objects and their impact on what otherwise would be natural woodland views that have existed for all time, we think all properties within say 3 or 4 miles of the turbines (we appreciate the turbines can be seen much farther than this but accept that some limits must be applied) that are in direct line of sight of the development (and this can be easily established) should have been directly contacted by the Council.

In 2014 we objected to the previous version of this application (10/14/1117) and asked to be put on the list of affected neighbours, obviously without success – confirming PLANNING BY STEALTH

We would appreciate your comments/response on this.

Be fully aware that we are completely opposed to the development and very dissatisfied with the way this particular planning proposal has been handled, in particular who has or hasn't been notified.

Be assured we will fight this to the bitter end and are backing our Councillor Julie Slater and MP Jake Berry in their opposition to this plague.

Ian Almond, 1 Mill Cottages, Waterside, Darwen, BB3 3NY, 11/07/16

Good Morning,

I am writing to object to the installation of three wind turbines on Hoddlesden Moss, Hoddlesden, Darwen by Viridis Wind Turbines which is under Application Reference: 10/16/0704.

My reasons for objection are as follows:

I have lived in the Hoddlesden/Waterside area for over 30 years (All my life) & part of the reason I love the place is that, although it is only over the hill from the towns of Darwen & Blackburn, there is a tranquility & a wilderness about the place. You can go for a wander in the fields & see miles of beautiful landscape. Installing the turbines will ruin the view even further, following on from the catastrophic decision to allow a wind farm behind the Grey Mare at the side of the Grane Road.

There are also concerns regarding nature & wildlife that thrive upon the area that is proposed to place these turbines. It is my belief that many ecosystems will be severely disrupted by the installation, & this could lead to severe consequences for a substantial amount of the amazing wildlife we take for granted on our doorsteps. Much of the wildlife that was displaced by the pre-mentioned turbines on the Grane Road has now settled in the Hoddlesden Moss area & I feel that tampering with such an eco-system further can only be detrimental.

I am also concerned that there will be major disruption caused by the installation mainly along the small country roads surrounding the site. Large wagons & plant machinery will no doubt be involved & the damage to our roads these vehicles cause is not to be underestimated. I am certain that no thought has gone into the damage that these vehicles will do to our roads or that any repairs will be a necessity. After all it's 'only a country road anyway'.

My final point of objection is that wind turbines are massively ineffective. Having done some research it appears that wind turbines operate between wind speeds of 15mph & 30mph. If it is below 15mph they don't create enough power & if the wind speed goes above 30mph they are shut down to avoid damage. Between 25mph & 30mph the turbine runs at its full capacity. A wind turbine generally creates around 30% of its maximum potential output. It seems so selfish of the money driven installers to ruin such a beautiful area for what on the whole would seem to be an ineffective source of power.

Many thanks for taking the time to read my views which are, on the whole, unchanged since the previous applications were entered.

16/02/17

Good Morning,

I am writing again to object to the installation of three wind turbines on Hoddlesden Moss, Hoddlesden, Darwen by Viridis Wind Turbines which is under Application Reference: 10/16/0704.

My reasons for objection are as follows:

I have lived in the Hoddlesden/Waterside area for over 30 years (All my life) & part of the reason I love the place is that, although it is only over the hill from the towns of Darwen & Blackburn, there is a tranquility & a wilderness about the place. You can go for a wander in the fields & see miles of beautiful landscape. Installing the turbines will ruin the view even further, following on from the catastrophic decision to allow a wind farm behind the Grey Mare at the side of the Grane Road.

There are also concerns regarding nature & wildlife that thrive upon the area that is proposed to place these turbines. It is my belief that many ecosystems will be severely disrupted by the installation, & this could lead to severe consequences for a substantial amount of the amazing wildlife we take for granted on our doorsteps. Much of the wildlife that was displaced by the pre-mentioned turbines on the Grane Road has now settled in the Hoddlesden Moss area & I feel that tampering with such an eco-system further can only be detrimental.

I am also concerned that there will be major disruption caused by the installation mainly along the small country roads surrounding the site. Large wagons & plant machinery will no doubt be involved & the damage to our roads these vehicles cause is not to be underestimated. I am certain that no thought has gone into the damage that these vehicles will do to our roads or that any repairs will be a necessity. After all it's 'only a country road anyway'.

My final point of objection is that wind turbines are massively ineffective. Having done some research it appears that wind turbines operate between wind speeds of 15mph & 30mph. If it is below 15mph they don't create enough power & if the wind speed goes above 30mph they are shut down to avoid damage. Between 25mph & 30mph the turbine runs at its full capacity. A wind turbine generally creates around 30% of its maximum potential output. It seems so selfish of the money driven installers to ruin such a beautiful area for what on the whole would seem to be an ineffective source of power.

1

Many thanks for taking the time to read my views which are, on the whole, unchanged since the numerous previous applications were entered.

In my opinion the 'amendments' made recently contain many false information and inaccurate statements which I believe further discredit this application.

Mr Duncan Turner, 17 Blacksnape Road, Hoddelsden Darwen, BB3 3PN 22/07/16

Re: Hoddlesden Moor Planning Application 10/16/0704. Formal objection to construction of three wind turbines.

Dear Kate,

I do understand and support the principle of renewable energy. I do not object on the basis of "not on my doorstep" but because of the environmental impact of such a development. This habitat is important because of the flora and fauna which it supports, many species of which are under threat from loss of habitat.

Also I am concerned that once allowed the three wind turbines could become rather more !!

I would assume also that access to the sight would be via Roman road which is not suited to heavy traffic. Sections of the road are already one way traffic due to the parked cars of residents.

Alan P Buchanan FCII, Broadmeadow Cottage, Knowsley Lane, Turton. Boltob,
BL70JH 06/03/17

Please note my objection to the above application/development

1. INTRODUCTION

1.1 We believe that the turbines will be dominant features on the hilltop above their properties and clearly visible in the outlook from our Property. The turbines will be equally if not more visible from the other properties of Knowsley Lane.

2. COMMUNITY ENGAGEMENT

2.1 Given the proximity of these properties to the turbine application site it is surprising that none of the Knowsley Lane properties were advised of the planning application which is now more than six months old; the fear is that these properties and the impact upon them has been totally overlooked both by the applicants in devising their proposals and by the Council in assessing them.

2.2. It is clear from the applicants submission that their "community engagement" did not extend to properties outside the immediate Hoddlesden, Waterside and Pick-up Bank areas and neither residents of, nor the Parish Council of North Turton were consulted or even informed of the proposals by the applicants; this is a serious oversight and totally undermines the applicants claim to have community support for the proposals. The submitted documents suggest that the public consultation that did take place was as long ago as 2013 and that really cannot be relied on as being valid in 2017.

3. VISUAL AMENITY

3.1 Whilst a photograph and visualisation have been provided to "demonstrate" the visual impact of the proposed turbines, including a photograph taken from Broadhead Road close to The Toby Inn such things are notoriously misleading as the eye does not perceive in the same way as a camera and the camera cannot capture the visual impact of turbines in motion with the revolution of the blades making turbines much more noticeable visually. The reality of the situation here is that three huge towers with revolving blades would be a dominant hilltop feature detracting from the unspoilt outlook, character and nature of Hoddlesden Moss and Soot Hill.

3.2. Whilst no-one has a "right to a view" this is not about loss of a private "view" but about a gross intrusion on a public view of an unspoilt moorland hill. This is an important issue as a present this area between the M61 and the Grane Road is largely unspoilt by structures of the scale and magnitude of wind

1

turbines. The presence of the turbines to the east of the Grane Road demonstrates just what a deleterious visual impact turbines can have on a wide area of landscape. It is probably worth noting at this point that the three turbines proposed do not extend the full length of this moorland ridge and on plan at least it would appear that further turbines could be added southwards at limited cost as the service road and infrastructure would be in place.

4. LOCAL PLANNING POLICY

4.1 The proposal appears to refer consistently to the last, but now superseded version of the Borough Local Plan, quoting policies therefrom that are now overtaken by changes made; changes in planning policy are therefore not reflected in this submission. In assessing compliance with planning policy regard has been had to the Landscape Strategy for Lancashire, the Blackburn with Darwen Local Plan Part 1 Core Strategy and Part 2 dealing with development management and to the National Planning Policy Framework and the associated National Planning Practice Guidance suite.

4.2 The Landscape Strategy identifies the site as within the West Pennine Moors with a Moorland Hills designation; within such an area it indicates that development such as this "can be intrusive" if a "cluttered skyline" is created and as a guiding principle that local distinctiveness should be recognised and enhanced. The hill is currently uncluttered, its bare top forming a characteristic and distinctive moorland feature that would be lost if turbines were erected on it; the proposal is therefore clearly contrary to the aims and ambitions of the Landscape Strategy for Lancashire.

4.3 Policy CS18 of the Borough Core Strategy states at part 2
"The key features of landscapes throughout the Borough will be protected. Development likely to affect landscapes or their key features will only be permitted where there is no unacceptable adverse impact on them. The level of protection afforded will depend on the quality, importance and uniqueness of the landscape in question."

And Part 2 of the Local Plan further states in policy 41

"Development will be permitted provided there is no unacceptable impact on landscape character or the principal traits associated with it."

It is clear that that introducing three giant wind turbines on to the top of this unspoilt hilltop will have an unacceptably adverse impact on the character of the landscape and the proposal is therefore contrary to the Local Plan.

4.4 Policy CS18 of the Borough Core Strategy states in part 3,
"The active use of the Borough's landscapes through leisure and tourism will be promoted where this is compatible with objectives relating to their protection."

And Part 2 of the Local Plan further states in policy 34

**"Tourism-based development will be granted planning permission, with priority given to the following locations:
ii) the West Pennine Moors as defined on the Adopted Policies Map for uses associated with the recreational use of the Moors. All recreational development must be sensitive to the natural environment that is the tourism asset of the West Pennine Moors**

We would suggest that three large wind turbines on an unspoilt hilltop in the West Pennine Moors is going to undermine the Council's strategy of encouraging tourism and the related tourist spend into the local economy. The area where the turbine towers are proposed is criss crossed with public footpaths giving access for town dwellers and visitors to the unspoilt beauty of the moors; the presence of the proposed turbines would impact adversely on the areas recreational potential. The proposal is thus clearly in conflict with the Local Plan and Core Strategy.

4.5 The Council has adopted a specific policy in Part 2 of the Local Plan with regard to wind Turbines, policy 37: this states at the outset,

"1. Wind turbine development will be permitted where it complies with all of the following criteria:"

It is notable that the policy requires compliance with all the following criteria, however it fails immediately:

i) the development has no unacceptable adverse visual impact and does not unacceptably undermine the character of the landscape;

As set out above the proposal would have a seriously adverse visual impact and would undermine the character of the landscape; it falls again at the ninth and tenth hurdles:

ix) the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and

2

x) following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.

There is no Local or Neighbourhood Plan that has identified the area as suitable for wind energy development and, in any case, the consultation with the "local community" was very restricted and ignored people like the residents of Knowsley Lane who will be seriously adversely affected by the proposal; they simply were not consulted, let alone had their concerns addressed and they certainly do not back the proposal. The proposal is therefore contrary to policy 37 of the Local Plan.

turbines. The presence of the turbines to the east of the Grane Road demonstrates just what a deleterious visual impact turbines can have on a wide area of landscape. It is probably worth noting at this point that the three turbines proposed do not extend the full length of this moorland ridge and on plan at least it would appear that further turbines could be added southwards at limited cost as the service road and infrastructure would be in place.

4. LOCAL PLANNING POLICY

4.1 The proposal appears to refer consistently to the last, but now superseded version of the Borough Local Plan, quoting policies therefrom that are now overtaken by changes made; changes in planning policy are therefore not reflected in this submission. In assessing compliance with planning policy regard has been had to the Landscape Strategy for Lancashire, the Blackburn with Darwen Local Plan Part 1 Core Strategy and Part 2 dealing with development management and to the National Planning Policy Framework and the associated National Planning Practice Guidance suite.

4.2 The Landscape Strategy identifies the site as within the West Pennine Moors with a Moorland Hills designation; within such an area it indicates that development such as this "can be intrusive" if a "cluttered skyline" is created and as a guiding principle that local distinctiveness should be recognised and enhanced. The hill is currently uncluttered, its bare top forming a characteristic and distinctive moorland feature that would be lost if turbines were erected on it; the proposal is therefore clearly contrary to the aims and ambitions of the Landscape Strategy for Lancashire.

4.3 Policy CS18 of the Borough Core Strategy states at part 2

"The key features of landscapes throughout the Borough will be protected. Development likely to affect landscapes or their key features will only be permitted where there is no unacceptable adverse impact on them. The level of protection afforded will depend on the quality, importance and uniqueness of the landscape in question."

And Part 2 of the Local Plan further states in policy 41

"Development will be permitted provided there is no unacceptable impact on landscape character or the principal traits associated with it."

It is clear that that introducing three giant wind turbines on to the top of this unspoilt hilltop will have an unacceptably adverse impact on the character of the landscape and the proposal is therefore contrary to the Local Plan.

4.4 Policy CS18 of the Borough Core Strategy states in part 3,

"The active use of the Borough's landscapes through leisure and tourism will be promoted where this is compatible with objectives relating to their protection."

And Part 2 of the Local Plan further states in policy 34

"Tourism-based development will be granted planning permission, with priority given to the following locations: ii) the West Pennine Moors as defined on the Adopted Policies Map for uses associated with the recreational use of the Moors. All recreational development must be sensitive to the natural environment that is the tourism asset of the West Pennine Moors

We would suggest that three large wind turbines on an unspoilt hilltop in the West Pennine Moors is going to undermine the Council's strategy of encouraging tourism and the related tourist spend into the local economy. The area where the turbine towers are proposed is criss crossed with public footpaths giving access for town dwellers and visitors to the unspoilt beauty of the moors; the presence of the proposed turbines would impact adversely on the areas recreational potential. The proposal is thus clearly in conflict with the Local Plan and Core Strategy.

4.5 The Council has adopted a specific policy in Part 2 of the Local Plan with regard to wind Turbines, policy 37: this states at the outset,

"1. Wind turbine development will be permitted where it complies with all of the following criteria:"

It is notable that the policy requires compliance with all the following criteria, however it fails immediately:

i) the development has no unacceptable adverse visual impact and does not unacceptably undermine the character of the landscape;

As set out above the proposal would have a seriously adverse visual impact and would undermine the character of the landscape; it falls again at the ninth and tenth hurdles:

ix) the development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and

5. NATIONAL PLANNING POLICY

5.1 Identifying the conflict with the adopted Local Plan Part 2 and Core Strategy documents is important as the National Planning Policy Framework makes clear in paras 2, 11 and 196 that development decisions should be made in accordance with an adopted Local Plan where it is up to date, as in this case. Para 7 of the NPPF indicates that there are three important strands to sustainable planning and that these are to be held in tension, no one trumping the other, these are economic, social and environmental strands and the conservation and enhancement of the natural environment is one of the core planning principles set out in Para 17; the environment and its protection is thus a fundamental and important part of planning as seen by the Government.

5.2 Elsewhere in the NPPF Para 109 refers to the need to conserve and enhance natural and local environments and particularly to protect and enhance "valued landscapes"; although valued landscapes are not defined as such, there can be no doubt that this landscape, which is designated as a specific landscape character area, moorland hills and the West Pennine Moors, fits the picture of such a "valued landscape", were it not it would not have received the extra layer of protection that such designation affords it.

5.3 Furthermore Para 123 of the NPPF indicates that areas of tranquillity that are relatively undisturbed by noise should be identified and protected as such areas are prized for their amenity and recreational values. As stated above this moor is such an area, crossed by public footpaths and close enough to major urban areas to provide an opportunity for town and city dwellers to enjoy a break in the countryside, even if only for a day or so.

5.4 The National Planning Practice Guidance suite offers specific advice in respect of renewable and low carbon technology stating that "in the case of wind turbines a planning application should not be approved unless the proposed development site is an area identified as suitable for wind energy development in a local or neighbourhood plan". Furthermore it states, "the need for renewable or low carbon energy does not automatically override environmental protections" and "local topography is an important factor in assessing if the effect on the landscape is damaging" and finally, "protecting local amenity is an important consideration".

As the Council's Local Plan Part 2 and Core Strategy clearly reflect the national framework and practice guidance and as the development is demonstrably contrary to the Local Plan and Strategy it follows that the proposal must be contrary to the National Framework and Guidance. The NPPF is clear and repeats that development decision making should follow adopted planning policy and as this proposal is so clearly contrary to adopted policies, both national and local, it follows that the proposal should be rejected and the moorland safeguarded.

Roger, Cathie, Alex & Stephanie Bowker, Stand Farm Chapman Lane, Darwen BB3
3QS 09/08/16

Re: Hoddlesden Moor Planning Application 10/16/0704. Formal objection to construction of three wind turbines.

Dear Kate,

Our strongest objections to the proposed windfarm on Hoddlesden Moss were stated when the application was first lodged and refused - ref 10/14/1117. I have attached a copy of our letter of objection below for your reference, as these objections still apply and are of ongoing concern.

Since that date there has been a subsequent application for a bridal path across the Moss at Hoddlesden which was rejected on the grounds that it would be detrimental to wildlife and the visual landscape of an area soon to be designated SSSI; to have an area of SSSI within BwD would be an asset and an attraction to the area and a feather in the cap of the Authority and we are sure that everyone who loves the countryside will agree that this must not be compromised.

Copy: letter of objection to windfarm on Hoddlesden Moss Ref 10/14/1117

OBJECTIONS TO THE PROPOSED WIND FARM ON HODDLESDEN MOSS

Ref: 10/14/1117

- The Moss is designated a County Heritage Site within a countryside designated area by LCC
- This area already has electricity pylons over parts of it and has been visually and physically blighted to a degree already by the Belthorn Wind Farm, a scheme over which the residents of Hoddlesden had no say, as the wind farm is in Hyndburn.
- The effect on the wild life of this proposal would undoubtedly be detrimental. I say this having had the pleasure of looking after the Moss and surrounding areas from 1985 until the new owners took over 2 years ago. Last year, when this application was first submitted, I sent you enclosed with my objection a report we had commissioned in 1994 by the GCT (as it was then) now called GWCT. They are a scientific charity who report without prejudice. Please refer to this document.
- After we initiated many of the proposals of the report there was a big jump in the number of ground nesting birds of various species, this resulted in the arrival of a variety of raptors including peregrine falcons hunting from their base on India Mill chimney in Darwen to one of the smallest falcons the Merlin taking up residence at Scotland

1

lodge on the edge of the moss. We deemed the effort that we had put implementing the proposals a success, most of that will disappear with the advent of the scheme.

- I would also mention that what looks like a track across the top of the moss was not there two years ago and might have been created to give the impression that access to the site was pre-existing, which I can unequivocally state is not the case.
- A report recently came out raising concerns about the danger to bats caused by wind farms, as bats are a totally protected species and that to take any actions that could be detrimental to them is a serious offence, the proposers of this scheme need to be made aware of the serious risks they run of incurring substantial punitive costs.

- In my last objection I also enclosed a copy of an e-mail circulated to members of Pickup Bank Parish Council, dated 9/7/13, which I would ask you again to refer to. You will see from the main paragraph that they were being asked for ideas on how to spend their windfall from the wind farm even though plans had not even been submitted at that time. This together with offers of monies to various bodies in the village (the Carus centre, Youth club etc) amount to efforts to undermine the democratic process by the proposers of this scheme.

- Data released by the Valuation Office Agency reveals a number of homeowners have successfully applied to have their properties moved to a lower band because of their proximity to a wind farm and yet a person affected by a scheme cannot use devaluation of their property by said scheme as an objection. I would also like to add that a distance of 1.2 miles from habitation has been advised when siting a wind farm.

- There are fourteen livestock farms and domestic properties which rely totally for their water supply on the water tank situated on the Moss. The water is collected from springs which are fed by seepage from high on the Moss. Any interference or disturbance of the Moss could very easily result in a polluted and restricted or damaged flow of water supply to these properties; residents of these properties and livestock alike would suffer. In the event of potential damage or the loss of this water supply through the construction of the wind farm or its maintenance, who would pay for the piping and installation of mains water to all these properties? Who would then also be responsible for the water rates bills which the properties would then incur (properties which currently do not pay for water as this is a private supply)?

We already have historic electricity pylons across the area. We now have the Hyndburn wind farm at Belthorn which is sadly visible, even on a foggy day. If there is a wind farm on Hoddlesden Moss, within such close proximity to the village, would the area designation change from East Rural to East Industrial?

I trust that you will give due consideration to these serious concerns.

OUR REF: KF/KF/KFM1/4
YOUR REF:



15 December 2016

FAO Ms K McDonald
Planning Department
Blackburn with Darwen Borough Council
Town Hall
BLACKBURN
Lancs.
BB1 7DY

Dear Sirs

Re: Planning Permission 10/16/0704
Hoddlesden Moss Hoddlesden Darwen

We have been approached by Mr Roger Bowker the owner of Stand Farm Chapman Road Hoddlesden BB3 3QS in relation to the above planning application.

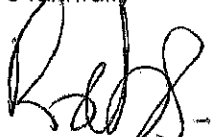
We are advised that the installation of the wind turbines will disturb a nearby water supply that serves our clients property and his neighbouring properties.

Our client has been advised that there is a report which states that testing of the water supply will be carried out after the works have been completed. But there is no evidence in the report that any provision has been made for what would happen should the supply be adversely affected.

Our client is understandable concerned about this matter as he has not been consulted during the planning process so far. Our client is seeking confirmation that his water supply would not be adversely affected by the works in installing the Wind Turbines and we would be grateful if you could provide us with copies of any relevant reports in relation to this together with your confirmation that the situation with regard to the water supply has been thoroughly investigated.

We look forward to hearing from you.

Yours faithfully



Roebucks Solicitors

Direct Dial: 01254 274068
E-mail: kellie.cook@roebuckslaw.co.uk

DIRECTORS:

ROBIN PHOENIX
VICTORIA DE-MEL
ALISON NOLAN
KAREN WADE
KELLIE COOK
GINA STEELE

CONSULTANTS:

PETER KING
RONALD SHIPLEY
MARTIN BLOCK

ASSOCIATES:

DAVID GRIFFITHS
IAN HUGGAN
RUTH SAGAR
IMRAN HUSSAIN
JOANNE LEWIS
SALMA AHMAD
KATIE MAYOH
KATIE ROABUCK

LEGAL EXECUTIVES:

COLLEEN DICKINSON-JONES
ANDREW PERKS

PARALEGALS:

EMMA TOMLINSON
SHARON GRISHAKOW
FAIZA KAUSAR

PRACTICE MANAGER:

AMANDA THOMPSON

QUALITY MANAGER:

JULIE WALKDEN

12-13 RICHMOND TERRACE
BLACKBURN BB1 7BG

TEL: 01254 274000
FAX: 01254 274002
DX: 15254 BLACKBURN 2

www.roebuckslaw.co.uk

24 Hour Emergency No.
07903 559919

OFFICES ALSO AT:

7-8 RICHMOND TERRACE
BLACKBURN BB1 7BG

TEL: 01254 274000
FAX: 01254 274002
DX: 15254 BLACKBURN 2

7 CANNON STREET
ACCRINGTON BB5 1NJ

TEL: 01254 274000
FAX: 01254 306561
DX: 23770 ACCRINGTON

31 KING STREET
CLITHEROE BB7 2EU

TEL: 01200 453131
FAX: 01200 453130
DX: 15151 CLITHEROE

Lexcel
Practice Management Standard
Law Society Accredited

Andrew Firth, Top O'th Meadow Cottage, Pickup Bank, Darwen, BB3 3QQ 26/07/16

Dear Sirs,

I am alarmed to discover the above mentioned planning application for 3 wind turbines which will extend to 76.5 metres in height on Hoddlesden Moss. I live at Top'Oth Meadow Cottage, Pickup Bank overlooking this beautiful natural landscape, and am extremely surprised to note that I was not directly advised of this planning application which is clearly going to have a massive visual impact to all properties in Pickup Bank. I note from the website that you were expecting objections by 27th July 2016 - it is difficult to object if interested parties are not advised!

I wish to object strongly to this major development - the experience at nearby Oswaldtwistle Moor gives me first hand experience of the significant impact on the local habitat caused by the access roads and infrastructure. This proposed development will destroy the very special nature of the Moss and surrounding area - peaceful with uninterrupted views. Surely it would also have an adverse impact on the local ecology and interrupt breeding birds and other wildlife etc. It will have a significantly adverse visual impact from my property and indeed all the surrounding area which will undermine the character of the area.

I am also concerned about potential road safety issues during the proposed construction period - the roads are narrow and the massive trucks needed to transport the actual turbines and general construction vehicles will potentially cause disruption to local residents and cause serious road safety issues.

This area of the West Pennine Moors is a designated Countryside Area and I insist that this designation be respected. There are already two large scale windfarms in this area - Scout Moor and Hyndburn/Oswaldtwistle. Both of these sites have already lodged applications for significant expansion of what is already a visual eyesore. I walk and run regularly around these areas and I am appalled by the industrialisation of these beautiful moorland areas.

Ann Gleave, Old Temple House, Roman Road, Hoddlesden, Darwen BB3 3PP
27/07/16

I wish to lodge my objections to the planning application 10/16/0704.

I believe there will be an adverse impact on mine and nearby properties ruining existing views, noise, light reflection and the flicker effect from the rotating blades.

I believe the noise from the three proposed turbines would be quite substantial as I already experience noise from the rotating blades of the much smaller turbine already in existence

I am convinced that such huge structures would have an adverse effect on the rural landscape. The plants, birds, wildlife, protected habitats and features of ecological importance would be devastated.

Hoddlesden, Edgworth and Chapeltown are conservation areas and such a development could affect the setting and character of these areas.

This area of the West Pennine Moors continues to be respected as a designated Countryside Area and a development of this nature would have a detrimental effect on the whole area.

Kathryn David, The Grange, Broadhead Road, Turton, Bplton BL7 0JW 02/08/16

& 01/03/17

Objection to Application Ref 10/16/0704 Turbines at Hoddlesden Moss

My family and I reside at The Grange, Pastures Farm, Broadhead Road, one of the affected properties of this application.

I would like to comment with regard to the planning application currently submitted for the installation of 3 wind turbines on Hoddlesden Moss.

Firstly, I would like to call into the Councils' communication, or lack of it. Most of the properties on Broadhead Road and Moorside Road have never received notification of this application, yet I feel these properties are significantly affected by it.

Also, I believe that the date listed was a deliberate attempt to coincide when the majority of residents being away on holidays as it is the the week of the school holidays. In my opinion, the consultation period should be extended to allow residents to see this planning application.

I have been very sick for several years and I am disabled. The noise (sound pollution) from the wind turbines would severely affect my sleep which would of course deteriorate my health even further.

A regular visitor to my property suffers from epilepsy. The flicker off the wind turbines are very likely to trigger epileptic seizures.

Notwithstanding that, I believe a precedent has been set for the area of the Broadhead Valley with regard to previous applications for such, small in quantity yet large and visually intrusive wind turbines see 10/03/0689 application for turbines at the rear of Uglow Farm, Broadhead Road.

This current application shares many similar attributes and in my opinion would be **significantly out of character with the local area** and would significantly affect my enjoyment and use of my property. The main draw to walkers, residents and visitors to Broadhead Valley is the uninterrupted views that can be afforded, this application would severely hamper this. The applicants' Landscape and Visual Assessment supports this assertion, naming a number of major-moderately affected areas from the visual impact survey. The size and scope of these turbines are purely out of character and would amount to industrialisation of a rural area that has just started to thrive from a growth in rural tourism and people enjoying the countryside that this little pocket of land provides.

1

This particular area as a whole has already succumbed to a cumulative effect and is already severely over populated with wind turbines. If you stand next to Higher Pastures Farm, behind there is a massive wind farm on Grane Road less than a mile away, if you look to your left on the next hill in Rossendale there is a massive wind farm and to the front there are several wind turbines. If another Wind farm is accepted, the local residents would be totally surrounded by wind turbines. The local countryside is totally ruined by enormous wind turbines dominating the skyline.

Lastly, the application clearly states that there are no protected species in the area, this is not true, There are badgers, deer, owls, bats, Robins, Canadian geese, curlews, lapwings, kestrels, sparrows, woodpeckers, Jay's, bull finches, wrens and many more

In summary, I believe the proposed development would, by virtue of its size and siting, introduce a highly prominent feature to the detriment of the landscape and visual character of this area of the West Pennine Moors and the Broadhead Valley and adjacent moorland. As such the proposed development would be contrary to Policies ENV8, ENV9, LNC1 and LNC3 of the Blackburn with Darwen Borough Local Plan and should be refused.

Whilst there is a need for alternative sources of energy, a more-suitable site should be found that does not compromise nor sacrifice currently unspoilt moorland views such as Hoddlesden Moss and the Broadhead Valley for such a minimal gain that 3 turbines will provide.

Mrs Linda Taylor, 27 Eccleshill Gardens Eccleshill Darwen BB3 3PQ 07/07/16

Full Planning Application

Installation of 3 wind turbines, hub height of 50metres, 'to tip' height 74metres, to include all ancillary works at Hoddlesden Moss, Hoddlesden, Darwen.

Case Officer: Katie Wright

I am writing to you today so that I can let you know of my objections regarding the above named application.. I am against the erection of 3 more wind turbines in the local vicinity. Please accept my objections.

1/ I can already see 3 from my home. That is enough.

2/ I am against the threat and massive disruption to our countryside and wildlife, not only birds, but bats and ground creatures to name a few.

3/ I am against the number of wind turbines which will go up if this initial application is approved. It needs a large numbers of wind turbines to produce even a small amount of power. The applicant is starting with 3, where will the applicant stop if this planning is granted.

4/ I fear these wind turbines never pay for themselves due to the high start up costs. This means residents will actually see very little if anything at all.

5/ I am against the noise given out by wind turbines, it can be surprisingly loud especially from a large wind farm. This will put a halt to the tranquil countryside.

6/ The wind is inconsistent, unsteady and unpredictable, so the wind turbines will not run to capacity 100% of the time.

7/ I am against and damage to the peat bogs in our idyllic area.

8/ I am against the negative impact on our natural wells. Not only resident's use these natural wells but many, many ramblers.

9/ I am against the damage which is being caused to the track which is now turning into a road which is due to the applicant & their consultants keep using it. This is damaging the visual impact of the countryside. It has already started affecting the wildlife; we have seen the loss of certain types of birds. This downward spiral will only continue if the application is granted.

21/07/16

Further to my recent email detailing my objection to the above mentioned planning application.

Please accept these further objections.

The wind turbine sizes have changed, which means resonance from them will differ.

Non of the roads to the site are suitable for the HGV vehicles needed to transport masts and blades.

Reports & Assessments are not up to date as they relate to the previous application.

Jim Hodgson, The Bungalow, Broadhead Road, Edgworth BL7 0JJ

15/07/16

I would like to object to the planning application no. 10/16/0704 for 3 wind turbines on the grounds that the wind farm would have a significant and unacceptable cumulative adverse impact on the character of the landscape and visual amenity sufficient to outweigh the wider benefits of renewable energy provision.

This application for 3 turbines would set a precedent for other similar sized wind farms within the West Penine Moors and we would end up with them dotted all over the moors.

If we are to have them at least keep them together in larger numbers in very remote areas rather than a small numbers popping up everywhere.

Dave Gorton, 28 Blacksnap Road Hoddlesden Darwen BB3 3PN

17/07/16

Regarding Planning Reference 10/16/0704

Please register this email as my objection to planning approval for a wind farm at Hoddlesden and Aushaw Moss. This project would be a blight on this area of beautiful natural moorland and ecologically unsound.

20/07/16

Re: Hoddlesden Moor Planning Application 10/16/0704. Formal objection to construction of three wind turbines.

Dear Kate,

please do not allow planning for wind turbines at Hoddlesden Moss. This is an area of natural beauty and a recreational area for walkers and bird watchers. Wind turbines would destroy yet another local area should this go ahead.

This area is recommended to become a 'Site of Special Scientific Interest' because of its rare breeding birds and fantastic habitat.

I'm sure you would not want to be a party to destroying it.

Jean Greenhalgh Drummer Stoops Farm Blacksnape Darwen BB3 3PR 24/07/2016

Objection to Planning Application No 10/16/0704 Installation Of Three Wind Turbines At Hoddlesden Moss, Hoddlesden, Darwen

We write to register the strongest objection to the application by Viridis Wind Turbines to install the above.

As a residents of Blacksnape, Darwen, for the past 43 years we feel that this proposal would seriously impede quality of life and the relative peace of the countryside by virtue of its size and the noise that it would generate.

The proposed site is totally inappropriate would dominate the scenery and in all probability devalue existing properties. Additionally there is a very real worry that if this application is granted it would set a precedent for further applications on this site as we have already experienced multiple turbines within the area. If other applications should be granted we would effectively be encircled by wind turbines and have an unacceptable visual impact undermining the character of the area.

Roads are also a major concern – the volume of traffic would increase to an unacceptable extent. The narrow roads in the area already display signs indicating that they are unsuitable for heavy vehicles which would be needed in the preparation and maintenance of the site and disrupt all modes of existing transport and would be a potential danger to public using the highways.

There ought to be firm limitations imposed by the local authority as to the size of the structures that are being installed in people's backyards. This proposed structure is far too big for the intended sight – it will dominate the skyline for miles around. The Council need to survey and locate suitable sights without serious disadvantages to Council Tax paying residents before they grant further applications in an area which is supporting more than its fair share of wind turbines which would seriously encroach on the nestling conservation areas around Hoddlesden Moss.

Ecological issues are also of very considerable concern as regards the wildlife, plants, habitats and the very nature of the moorland surrounding. Would this be adequately protected?

There have also been serious concerns amongst our fellow residents that once again there were so few people officially notified by the Planning Department of this application. The structures would be visible from many miles around; spoiling views; increasing noise levels; adding to highways danger and therefore the application should have been brought to the attention of more people.

The West Pennine Moors have been promoted as an area of natural beauty so the addition of these proposed wind turbines would do nothing to enhance the scenery and we would therefore urge that this application be rejected.

Dave McDonough, Holker House, Long Hey Lane, Pickup Bank, Darwen BB3 3QD

17/02/17

Reference 10/16/0704

I would object to the planning application for the wind turbines on Hoddlesden Moss because my property has a private water supply which comes from the area where these wind turbines are being proposed. There are numerous properties on this supply. I would have great fear that the water supply would be contaminated or disrupted during the construction works no matter how much care was taken to be prevent this from happening, clean water is a life essential and I do feel that our right to it should not be compromised in any way.

I would also have great concerns as to the viability of this water supply once the works are finished, large areas being filled with concrete and everything else involved in the construction and running of the turbines I can't imagine that the water flowing off the moss will still run as it does today which could potentially cause our water supply to be at best interrupted or worse and so in effect would mean that it was no longer a viable source of water and we would have to then make other arrangements for our water supply.

I would much appreciate it if you could take this matter into consideration when you are deciding on the planning application.

Dr C Welshman, Pastures Farm, Broadhead Road, Edgworth, Lancs BL7 0JW

No to Windfarms

Dear Madam

We totally object to the planning application 10/16/0704. Hoddlesden Moss Hoddlesden Darwen

As long standing residents and council tax payers to Blackburn with Darwen council, we are extremely annoyed that we have not been informed of this application that affects our property.

The location of the proposed wind turbines is directly behind our property in the region of approximately 500m and would tower over our property.

The enormous size and proximity would cause --

- a. Irreparable damage to the Green Belt Area which is already undergoing evaluation by Natural England site of special scientific interest (SSSI)
- b. Visually 3 such enormous towers almost 5 times or more the height of the surrounding properties plus 48m blades would be totally out of proportion with the natural landscape
- c. It would also be detrimental to the enjoyment of the area by the many visitors and locals who come to our beautiful valley
- d. The destruction of the flora, fauna and peat bogs of the area
- e. The planned access road is via Broadhead Road which is already a limited 7.5t road, unsuitable to large construction vehicles that will inevitably cause damage
- f. The road is already too narrow in places to accommodate large vehicles and is in a poor state of repair
- g. The proposed site access cuts right at the side and at the back of our property within 50m or so
- h. The inevitable amount of heavy construction traffic and materials will cause major disruption to our day to day lives.
- i. We are also concerned about potential damage to the natural soak-away drainage from our property
- j. There will be no local economic benefits forthcoming and will reduce property values and adversely affect local businesses
- k. If approved it will open the flood gates to more of these developments and will totally change this area forever
- l. The huge size of the turbines will cause a distraction to the many drivers who use Broadhead Road and this will lead to an increase in accidents on what is already a dangerous road
- m. There is already a similar larger development a couple of miles away overlooking Accrington so there can be no real need for any further wind farms of this nature in the area

We urge you to reject this application out of hand as being totally unsuitable for the area and of no real benefit to the local people / rate payers of Blackburn with Darwen council. We look forward to your support in preserving one of the most beautiful valleys in the borough. This is an area of Outstanding Natural Beauty .

Yours

Dr C Welshman

I **SUPPORT** the Planning Application 10/16/0704

RE- Planning Application : Installation of 3 wind turbines, hub height of 46m, to tip height 76.5m, to include all ancillary works.

I write in connection with the above planning application. I wish to **SUPPORT** strongly this application for the reasons below.

I support this application because
it goes to move to a low carbon
future

I would be grateful if you could add my **SUPPORT** to the planning application with immediate effect.

Name BARBARA BOLTON

Signature 

Address 17 POTHOUSE LANE
DARWEN
LANCS

Contact Number 

Email Address _____

Name..... Steve Wolski.....

Address..... 64 LINDISFARNE AVE
BLACKBURN
BB2 5UH.....

Kate McDonald
Case Officer
Planning Department
Blackburn with Darwen Borough Council
Town Hall
King William Street
Blackburn
BB1 7DY

Dear Kate McDonald,

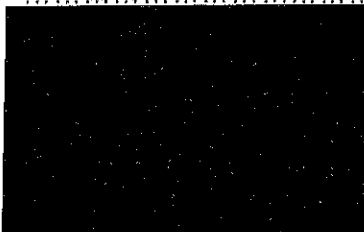
RE: Hoddlesden Moss Wind Turbines
Ref: 10/16/0704

I'm writing to **SUPPORT** this application for renewable energy because:

- Wind power reduces the need for new expensive nuclear power stations that leave a toxic legacy of radioactive waste that remains dangerous for thousands of years.
- I regard the location as an appropriate site for 3 wind turbines.
- Operation of the turbines would off-set around 5000 metric tons of carbon dioxide per year.
- Climate Change is the greatest threat facing our planet and we need urgent action on the issue. We need renewable technology solutions, such as these wind turbines, to tackle Climate Change.
- The 3 turbines could provide enough electricity to supply around 700 homes.
- The operation of wind power doesn't produce emissions of acid rain gases, carbon dioxide or particulate matter - unlike conventional power generation.
- Wind power helps to improve the UK's energy security.
- More wind power means cheaper electricity in the long run.

Additional support reasons or comments:

A safe clean alternative



Name... Aqsa Nabeel...

Address... 26 Mandella...

Court
Blackburn

Kate McDonald
Case Officer
Planning Department
Blackburn with Darwen Borough Council
Town Hall
King William Street
Blackburn
BB1 7DY

Dear Kate McDonald,

RE: Hoddlesden Moss Wind Turbines - Ref: 10/16/0704

I'm writing to **SUPPORT** this application for renewable energy because:

1. The 3 turbines could provide enough electricity to supply around 700 homes.
2. The operation of wind power doesn't produce emissions of acid rain gases, carbon dioxide or particulate matter - unlike conventional power generation.
3. Wind power helps to improve the UK's energy security.
4. More wind power means cheaper electricity in the long run.
5. Wind power reduces the need for new expensive nuclear power stations that leave a toxic legacy of radioactive waste that remains dangerous for thousands of years.
6. I regard the location as an appropriate site for 3 wind turbines.
7. Operation of the turbines would off-set around 5000 metric tons of carbon dioxide per year.
8. This scheme would have a community fund of around £20k.
9. Climate Change is the greatest threat facing our planet and we need urgent action on the issue. We need renewable technology solutions, such as these wind turbines, to tackle Climate Change.

Additional support reasons or comments:

.....
.....



Name..... ANAS
Address..... 72 Dunes
Beow
Blackburn

Kate McDonald
Case Officer
Planning Department
Blackburn with Darwen Borough Council
Town Hall
King William Street
Blackburn
BB1 7DY

Dear Kate McDonald,

RE: Hoddlesden Moss Wind Turbines - Ref: 10/16/0704

I'm writing to **SUPPORT** this application for renewable energy because:

1. The 3 turbines could provide enough electricity to supply around 700 homes.
2. The operation of wind power doesn't produce emissions of acid rain gases, carbon dioxide or particulate matter - unlike conventional power generation.
3. Wind power helps to improve the UK's energy security.
4. More wind power means cheaper electricity in the long run.
5. Wind power reduces the need for new expensive nuclear power stations that leave a toxic legacy of radioactive waste that remains dangerous for thousands of years.
6. I regard the location as an appropriate site for 3 wind turbines.
7. Operation of the turbines would off-set around 5000 metric tons of carbon dioxide per year.
8. This scheme would have a community fund of around £20k.
9. Climate Change is the greatest threat facing our planet and we need urgent action on the issue. We need renewable technology solutions, such as these wind turbines, to tackle Climate Change.

Additional support reasons or comments



Yours,

Name... Samuel Kay

Address... 94 Hollin
Bridge
Street
Blackburn

Kate McDonald
Case Officer
Planning Department
Blackburn with Darwen Borough Council
Town Hall
King William Street
Blackburn
BB1 7DY

Dear Kate McDonald,

RE: Hoddlesden Moss Wind Turbines - Ref: 10/16/0704

I'm writing to **SUPPORT** this application for renewable energy because:

1. The 3 turbines could provide enough electricity to supply around 700 homes.
2. The operation of wind power doesn't produce emissions of acid rain gases, carbon dioxide or particulate matter - unlike conventional power generation.
3. Wind power helps to improve the UK's energy security.
4. More wind power means cheaper electricity in the long run.
5. Wind power reduces the need for new expensive nuclear power stations that leave a toxic legacy of radioactive waste that remains dangerous for thousands of years.
6. I regard the location as an appropriate site for 3 wind turbines.
7. Operation of the turbines would off-set around 5000 metric tons of carbon dioxide per year.
8. This scheme would have a community fund of around £20k.
9. Climate Change is the greatest threat facing our planet and we need urgent action on the issue. We need renewable technology solutions, such as these wind turbines, to tackle Climate Change.

Additional support reasons or comments:

Yours



Name David Davis
Address 21 Pasture Lane
Hovingham
York YO62 4JT

Kate McDonald
Case Officer
Planning Department
Blackburn with Darwen Borough Council
Town Hall
King William Street
Blackburn
BB1 7DY

Dear Kate McDonald,

RE: Hoddlesden Moss Wind Turbines - Ref: 10/16/0704

I'm writing to **SUPPORT** this application for renewable energy because:

- Climate Change is the greatest threat facing our planet and we need urgent action on the issue. We need renewable technology solutions, such as these wind turbines, to tackle Climate Change.
- The 3 turbines could provide enough electricity to supply 1500 homes.
- The operation of wind power doesn't produce emissions of acid rain gases, carbon dioxide or particulate matter - unlike conventional power generation.
- Wind power helps to improve the UK's energy security.
- More wind power means cheaper electricity in the long run.
- Wind power reduces the need for new expensive nuclear power stations that leave a toxic legacy of radioactive waste that remains dangerous for thousands of years.
- I regard the location as an appropriate site for 3 wind turbines.
- The wind farm does not have any negative visual impact.
- Operation of the turbines will off-set around 2600 metric tons of carbon dioxide per year.
- This scheme will have a community fund of £15,000/year
- The scheme has an excellent peat restoration plan
- The wind farm does not have any detrimental effects on wildlife, flora or fauna.
- The proposal is a perfectly balance and passive technology with no negative environmental or social impacts.

Additional support reasons or comments:

.....
.....

Yours



Name... MR P. BEER
Address... 4 PENFOLD HEY
UPTON
CHESTER CH12 1ES

Kate McDonald
Planning Department
Blackburn & Darwen Borough Council
Town Hall
King William Street
Blackburn
BB1 7DY

Planning Ref: 10/16/0704 - Hoddlesden Moss Wind Turbines

Dear Kate McDonald,

I would like to register my **support** for the above wind farm.

There are many reasons for supporting this renewable development, some of which are listed

- 1 The wind farm can generate enough electricity for 1500 homes.
- 2 The wind farm doesn't emit carbon, sulphur, nitrogen or methane into the atmosphere and has no global warming potential.
- 3 On shore wind is the cheapest form of electricity generation and offers energy security
- 4 Reports have shown that the wind farm is not a threat to birds or wildlife.
- 5 Wind power is a proven resource as seen in Denmark and Scotland both of whom have exceeded 100% electricity generation from renewables (wind has played a significant roll in this success).
- 6 More wind power will result in cheaper electricity in the future.
- 7 Wind power means there is less requirement for fracking and other fossil fuels.
- 8 Wind power helps to achieve our national and local carbon targets as aligned to COP 21..
- 9 Hoddlesden Moss is a good location for wind farms and in close proximity to the larger wind farms on the Grane road.
- 10 The proposed turbines will offset 2600 tonnes of carbon per year which is very significant.
- 11 The developer who lives close to the wind farm has stated that he will invest £15,000 per year into community schemes including local community centres.
- 12 Climate change is the greatest risk to our plant and our childrens futures, we must embrace renewable technology now. Blackburn with Darwen Council should be supporting and promoting all renewable schemes within the borough and should be actively involved in seeking renewable investment within the borough.

Additional support reasons or comments:

.....
.....

Yours



Name... PHIL DALY
Address... 19 HERDINGS VIEZ
GLEADLESS
SHEFFIELD
S70 2LX
S12 2LE

Kate McDonald – Planning Department
Blackburn with Darwen Borough Council
Town Hall
King William Street
Blackburn
BB1 7DY

For the attention of Kate McDonald

Dear Kate

**Can you please register my support for
Reference - 10/16/0704 - Hoddlesden Moss Wind Farm**

The proposed wind farm is an excellent idea and should be approved because

Wind power reduces the need for expensive nuclear power station that take years to come on line and leave a toxic legacy for thousands of years.

More renewable energy negates the need for high risk fracking in Lancashire that poisons water, pollutes air and has serious health effects.

Hoddlesden Moss is a good location as can be seen from the turbines over the Grane Road. Building turbines on the moss means no compromise of agricultural land. Many Scottish wind farms are built on peat bogs.

The wind farm does not compromise local wildlife and after the peat restoration plan is envisaged the project will deliver net biodiversity gains and significantly enhanced wildlife.

The project is an ideal opportunity to enhance the quality of the peat land without Council investment.

Walkers can enjoy the therapeutic nature of the turbines as they do over the Grane Rd and at Scout Moor.

The wind farm will offset 2600 tonnes of carbon per year which will help the local carbon reduction target and is consistent with UK and European plans to reduce carbon emission.

The wind farm will generate enough energy for around 1500 local homes and this should be encourage. It will also invest in local communities by offering local employment and community investment of £15k/year thereby reducing the burden on reducing council budgets.

The Hoddlesden Moss Wind farm does not have any negative implication and should be approved and future renewable investment encouraged.

Sign



24/9/16

Name: JA TAYLOR

Address: 27 TUNGS LN

BILLINGHAM

UN5-750

Kate McDonald
Planning Department
Blackburn & Darwen Borough Council
Town Hall
King William Street
Blackburn
BB1 7DY

Planning Ref: 10/16/0704 - Hoddlesden Moss Wind Turbines

Dear Kate McDonald,

I would like to register my **support** for the above wind farm.

There are many reasons for supporting this renewable development, some of which are listed

- 1 The wind farm can generate enough electricity for 1500 homes.
- 2 The wind farm doesn't emit carbon, sulphur, nitrogen or methane into the atmosphere and has no global warming potential.
- 3 On shore wind is the cheapest form of electricity generation and offers energy security
- 4 Reports have shown that the wind farm is not a threat to birds or wildlife.
- 5 Wind power is a proven resource as seen in Denmark and Scotland both of whom have exceeded 100% electricity generation from renewables (wind has played a significant roll in this success).
- 6 More wind power will result in cheaper electricity in the future.
- 7 Wind power means there is less requirement for fracking and other fossil fuels.
- 8 Wind power helps to achieve our national and local carbon targets as aligned to COP 21..
- 9 Hoddlesden Moss is a good location for wind farms and in close proximity to the larger wind farms on the Grane road.
- 10 The proposed turbines will offset 2600 tonnes of carbon per year which is very significant.
- 11 The developer who lives close to the wind farm has stated that he will invest £15,000 per year into community schemes including local community centres.
- 12 Climate change is the greatest risk to our plant and our childrens futures, we must embrace renewable technology now. Blackburn with Darwen Council should be supporting and promoting all renewable schemes within the borough and should be actively involved in seeking renewable investment within the borough.

Additional support reasons or comments:

.....

.....
Yours, 



Renewable Energy Alliance Lancashire REAL

Letter of Support for Hoddlesden Moss Wind Farm Ref: 10/16/0704

1 message

Thu, Oct 13, 2016 at 12:11 PM

Kerris Casey

Kate McDonald,

I strongly encourage Blackburn with Darwen Borough Council to positively support the Hoddlesden Moss Wind farm Ref 10/16/0704, for the following reasons:

- 1) The scheme will offset 2600 tonnes of CO2 per annum along with other harmful pollutants generated from fossil fuel combustion, contributing positively to the reduction of climate change.
- 2) The scheme will contribute to Blackburn with Darwen moving towards a low carbon future and negate the need for intensive extraction technologies.
- 3) The Peatland Enhancement Proposal includes significant measures to improve the quality of the existing unfavourable peatland on Hoddlesden Moss and generating net biodiversity gains.
- 4) The proposal offers a major step towards energy security, with the capability of generating enough clean, green, healthy electricity to power 1500 homes.
- 5) Onshore wind is the cheapest form of electricity generation within the UK and should be encouraged across Lancashire.
- 6) The Hoddlesden Moss wind farm will generate local jobs and support local businesses through the establishment of a Local Suppliers Database that encourages local businesses to register interest allowing investment benefits to be retained within the local economy.
- 7) A significant Community Benefits Fund worth £15,000/year (inflation protected), will be available for local community investment.
- 8) The proposal is fully aligned to local and national planning policy on renewable energy generation and is a vital contributor to the Blackburn with Darwen Councils carbon reduction plan.
- 9) The UK's Climate Change Act legislates for an 80% reduction in greenhouse gas emissions by 2050 and the UK's legislated Carbon Budgets for the 2020's are already forecast to be significantly overshot. The Hoddlesden Moss Wind Farm's contribution to reducing the impacts of climate change within our community must be given substantial weight.

10) The Wind farm has no detrimental visual impacts and does not generate excessive noise or any emissions to atmosphere.

11) The proposal has no detrimental impact on wildlife or the natural environment, it does not contaminate air or water.

For the sake of future generations, we must act now to deliver the renewable energy capacity that we desperately need. We must transition from fossil fuel technologies and embrace affordable alternatives that offer Clean, Green Healthy Energy for our Children's futures and the future of our Earth.

Kerris Casey St Pierre



419 Revidge Road
Blackburn, Texas BB1 8DE



Renewable Energy Alliance Lancashire REAL

Letter of Support for Hoddlesden Moss Wind Farm Ref: 10/16/0704

1 message

Thu, Oct 13, 2016 at 5:38 PM

Johnathan Lincoln.

Kate McDonald,

I strongly encourage Blackburn with Darwen Borough Council to positively support the Hoddlesden Moss Wind farm Ref 10/16/0704, for the following reasons:

- 1) The scheme will offset 2600 tonnes of CO2 per annum along with other harmful pollutants generated from fossil fuel combustion, contributing positively to the reduction of climate change.
- 2) The scheme will contribute to Blackburn with Darwen moving towards a low carbon future and negate the need for intensive extraction technologies.
- 3) The Peatland Enhancement Proposal includes significant measures to improve the quality of the existing unfavourable peatland on Hoddlesden Moss and generating net biodiversity gains.
- 4) The proposal offers a major step towards energy security, with the capability of generating enough clean, green, healthy electricity to power 1500 homes.
- 5) Onshore wind is the cheapest form of electricity generation within the UK and should be encouraged across Lancashire.
- 6) The Hoddlesden Moss wind farm will generate local jobs and support local businesses through the establishment of a Local Suppliers Database that encourages local businesses to register interest allowing investment benefits to be retained within the local economy.
- 7) A significant Community Benefits Fund worth £15,000/year (inflation protected), will be available for local community investment.
- 8) The proposal is fully aligned to local and national planning policy on renewable energy generation and is a vital contributor to the Blackburn with Darwen Councils carbon reduction plan.
- 9) The UK's Climate Change Act legislates for an 80% reduction in greenhouse gas emissions by 2050 and the UK's legislated Carbon Budgets for the 2020's are already forecast to be significantly overshot. The Hoddlesden Moss Wind Farm's contribution to reducing the impacts of climate change within our community must be given substantial weight.

Man-made climate change is the greatest global threat that we face today. There is compelling evidence that the climate is changing and the cause of this is clear.

10) The Wind farm has no detrimental visual impacts and does not generate excessive noise or any emissions to atmosphere.

11) The proposal has no detrimental impact on wildlife or the natural environment, it does not contaminate air or water.

I personally find wind farms beautiful to look at, they represent a positive and necessary change

Not to take action to address climate change is simply unacceptable. The consequences of failing to address the warming of the planet will be severe and irreversible.

For the sake of future generations, we must act now to deliver the renewable energy capacity that we desperately need. We must transition from fossil fuel technologies and embrace affordable alternatives that offer Clean, Green Healthy Energy for our Children's futures and the future of our Earth.

Jonathan Lincoln

Jonathan Lincoln



Beck House, Stanhope Road

Horncastle, Lincolnshire, Lincolnshire LN9 5DG

Renewable Energy Alliance Lancashire REAL **Letter of Support for Hoddlesden Moss Wind Farm Ref: 10/16/0704**

1 message

Thu, Oct 13, 2016 at 10:11 PM


James Marsh.

Kate McDonald,

I strongly encourage Blackburn with Darwen Borough Council to positively support the Hoddlesden Moss Wind farm Ref 10/16/0704, for the following reasons:

- 1) The scheme will offset 2600 tonnes of CO2 per annum along with other harmful pollutants generated from fossil fuel combustion, contributing positively to the reduction of climate change.
- 2) The scheme will contribute to Blackburn with Darwen moving towards a low carbon future and negate the need for intensive extraction technologies.
- 3) The Peatland Enhancement Proposal includes significant measures to improve the quality of the existing unfavourable peatland on Hoddlesden Moss and generating net biodiversity gains.
- 4) The proposal offers a major step towards energy security, with the capability of generating enough clean, green, healthy electricity to power 1500 homes.
- 5) Onshore wind is the cheapest form of electricity generation within the UK and should be encouraged across Lancashire.
- 6) The Hoddlesden Moss wind farm will generate local jobs and support local businesses through the establishment of a Local Suppliers Database that encourages local businesses to register interest allowing investment benefits to be retained within the local economy.
- 7) A significant Community Benefits Fund worth £15,000/year (inflation protected), will be available for local community investment.
- 8) The proposal is fully aligned to local and national planning policy on renewable energy generation and is a vital contributor to the Blackburn with Darwen Councils carbon reduction plan.
- 9) The UK's Climate Change Act legislates for an 80% reduction in greenhouse gas emissions by 2050 and the UK's legislated Carbon Budgets for the 2020's are already forecast to be significantly overshot. The Hoddlesden Moss Wind Farm's contribution to reducing the impacts of climate change within our community must be given substantial weight.

10) The Wind farm has no detrimental visual impacts and does not generate excessive noise or any emissions to atmosphere.

11) The proposal has no detrimental impact on wildlife or the natural environment, it does not contaminate air or water.

For the sake of future generations, we must act now to deliver the renewable energy capacity that we desperately need. We must transition from fossil fuel technologies and embrace affordable alternatives that offer Clean, Green Healthy Energy for our Children's futures and the future of our Earth.

james marsh



18 knowsley crescent
preston, Lancashire PR4 3ND



Renewable Energy Alliance Lancashire REAL [REDACTED]

Letter of Support for Hoddlesden Moss Wind Farm Ref: 10/16/0704

1 message

[REDACTED] Thu, Oct 13, 2016 at 11:47 PM

Brett Lund.

Kate McDonald,

I strongly encourage Blackburn with Darwen Borough Council to positively support the Hoddlesden Moss Wind farm Ref 10/16/0704. for the following reasons:

- 1) The scheme will offset 2600 tonnes of CO2 per annum along with other harmful pollutants generated from fossil fuel combustion, contributing positively to the reduction of climate change.
- 2) The scheme will contribute to Blackburn with Darwen moving towards a low carbon future and negate the need for intensive extraction technologies.
- 3) The Peatland Enhancement Proposal includes significant measures to improve the quality of the existing unfavourable peatland on Hoddlesden Moss and generating net biodiversity gains.
- 4) The proposal offers a major step towards energy security, with the capability of generating enough clean, green, healthy electricity to power 1500 homes.
- 5) Onshore wind is the cheapest form of electricity generation within the UK and should be encouraged across Lancashire.
- 6) The Hoddlesden Moss wind farm will generate local jobs and support local businesses through the establishment of a Local Suppliers Database that encourages local businesses to register interest allowing investment benefits to be retained within the local economy.
- 7) A significant Community Benefits Fund worth £15,000/year (inflation protected), will be available for local community investment.
- 8) The proposal is fully aligned to local and national planning policy on renewable energy generation and is a vital contributor to the Blackburn with Darwen Councils carbon reduction plan.
- 9) The UK's Climate Change Act legislates for an 80% reduction in greenhouse gas emissions by 2050 and the UK's legislated Carbon Budgets for the 2020's are already forecast to be significantly overshot. The Hoddlesden Moss Wind Farm's contribution to reducing the impacts of climate change within our community must be given substantial weight.

10) The Wind farm has no detrimental visual impacts and does not generate excessive noise or any emissions to atmosphere.

11) The proposal has no detrimental impact on wildlife or the natural environment, it does not contaminate air or water.

For the sake of future generations, we must act now to deliver the renewable energy capacity that we desperately need. We must transition from fossil fuel technologies and embrace affordable alternatives that offer Clean, Green Healthy Energy for our Children's futures and the future of our Earth.

Brett Lund



19 Empire House

Preston, Lancashire PR1 3BA



Renewable Energy Alliance Lancashire REAL

Letter of Support for Hoddlesden Moss Wind Farm Ref: 10/16/0704

1 message

Fri, Oct 14, 2016 at 1:11 PM


Liz Stanton.

Kate McDonald,

I strongly encourage Blackburn with Darwen Borough Council to positively support the Hoddlesden Moss Wind farm Ref 10/16/0704, for the following reasons:

- 1) The scheme will offset 2600 tonnes of CO2 per annum along with other harmful pollutants generated from fossil fuel combustion, contributing positively to the reduction of climate change.
- 2) The scheme will contribute to Blackburn with Darwen moving towards a low carbon future and negate the need for intensive extraction technologies.
- 3) The Peatland Enhancement Proposal includes significant measures to improve the quality of the existing unfavourable peatland on Hoddlesden Moss and generating net biodiversity gains.
- 4) The proposal offers a major step towards energy security, with the capability of generating enough clean, green, healthy electricity to power 1500 homes.
- 5) Onshore wind is the cheapest form of electricity generation within the UK and should be encouraged across Lancashire.
- 6) The Hoddlesden Moss wind farm will generate local jobs and support local businesses through the establishment of a Local Suppliers Database that encourages local businesses to register interest allowing investment benefits to be retained within the local economy.
- 7) A significant Community Benefits Fund worth £15,000/year (inflation protected), will be available for local community investment.
- 8) The proposal is fully aligned to local and national planning policy on renewable energy generation and is a vital contributor to the Blackburn with Darwen Councils carbon reduction plan.
- 9) The UK's Climate Change Act legislates for an 80% reduction in greenhouse gas emissions by 2050 and the UK's legislated Carbon Budgets for the 2020's are already forecast to be significantly overshot. The Hoddlesden Moss Wind Farm's contribution to reducing the impacts of climate change within our community must be given substantial weight.

10) The Wind farm has no detrimental visual impacts and does not generate excessive noise or any emissions to atmosphere.

11) The proposal has no detrimental impact on wildlife or the natural environment, it does not contaminate air or water.

For the sake of future generations, we must act now to deliver the renewable energy capacity that we desperately need. We must transition from fossil fuel technologies and embrace affordable alternatives that offer Clean, Green Healthy Energy for our Children's futures and the future of our Earth.

Liz Stanton


53 grafton street

Preston, Lancashire Pr1 8jh

Name JAN SMITH
Address 3 MESSENGER ST
NELSON
BB9 0LW

Kate McDonald
Case Officer
Planning Department
Blackburn with Darwen Borough Council
Town Hall
King William Street
Blackburn
BB1 7DY

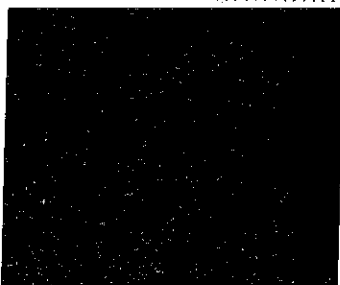
Dear Kate McDonald,

RE: Hoddlesden Moss Wind Turbines - Ref: 10/16/0704

I'm writing to **SUPPORT** this application for renewable energy because:

- Climate Change is the greatest threat facing our planet and we need urgent action on the issue. We need renewable technology solutions, such as these wind turbines, to tackle Climate Change.
- The 3 turbines could provide enough electricity to supply 1500 homes.
- The operation of wind power doesn't produce emissions of acid rain gases, carbon dioxide or particulate matter - unlike conventional power generation.
- Wind power helps to improve the UK's energy security.
- More wind power means cheaper electricity in the long run.
- Wind power reduces the need for new expensive nuclear power stations that leave a toxic legacy of radioactive waste that remains dangerous for thousands of years.
- I regard the location as an appropriate site for 3 wind turbines.
- The wind farm does not have any negative visual impact.
- Operation of the turbines will off-set around 2600 metric tons of carbon dioxide per year.
- This scheme will have a community fund of £15,000/year
- The scheme has an excellent peat restoration plan
- The wind farm does not have any detrimental effects on wildlife, flora or fauna.
- The proposal is a perfectly balance and passive technology with no negative environmental or social impacts.

Additional support reasons or comments:



Kate McDonald
Planning Department
Blackburn & Darwen Borough Council
Town Hall - King William Street
Blackburn, BB1 7DY

Support letter for Hoddlesden Moss Wind Farm, Reference number 10/16/0704

Dear Ms Kate McDonald,

I am writing to support the Hoddlesden Moss Wind Farm.

As you know climate change is the greatest threat to our biosphere and life on earth. At the Paris summit last year the world largely agreed to keep global warming below 1.5 degrees temperature rise, to achieve this we must stop burning fossil fuels and transition to a renewable energy future now.

I was very disappointed when I looked at Blackburn and Darwen renewable investment schemes and found nothing of any significance. This is a great shame considering the number of jobs that can be created from renewable energy is very significant.

We had very serious flooding in Whalley and Darwen within the last year and weather patterns across the globe tell us that this is a direct consequence of global warming.

The Hoddlesden Moss wind farm is a neutral technology that does not emit dangerous fumes, it does not contaminate our air or water, it doesn't poison our earth, it does not contribute to resource depletion, it does not bring enormous volumes of traffic or create noise and light pollution. The wind farm is passive, it does not harm birds or other wildlife, the proposal enhances our lovely peat moss with a restoration plan, it brings local work by employing local traders where possible, it does not use enormous volumes of drinking water and create masses of radioactive waste, it does not use chemicals or leave a legacy of radioactive waste, it does not involve processing radioactive material or burning fossil fuels.

The Hoddlesden Moss wind farm is a perfect development that will generate much needed renewable energy for 1500 homes and offset 2600 tonnes of carbon per year. The scheme offers a much needed community fund that will help towards community investment at a time when our Council budgets are being savagely cut by a government that appears not to have a viable energy policy. As you know on shore wind is the cheapest form of electricity generation and we should embrace as much of it as we can while we can.

Name DAVID RICHARD JOHN PENNEY

Address HIGH FIELD

21, KEIGHLEY ROAD, COLNE

BB8 0LP

Signature



26/9/16

Kate McDonald
Planning Department
Blackburn & Darwen Borough Council
Town Hall - King William Street
Blackburn, BB1 7DY

Support letter for Hoddlesden Moss Wind Farm, Reference number 10/16/0704

Dear Ms Kate McDonald,

I am writing to support the Hoddlesden Moss Wind Farm.

As you know climate change is the greatest threat to our biosphere and life on earth. At the Paris summit last year the world largely agreed to keep global warming below 1.5 degrees temperature rise, to achieve this we must stop burning fossil fuels and transition to a renewable energy future now.

I was very disappointed when I looked at Blackburn and Darwen renewable investment schemes and found nothing of any significance. This is a great shame considering the number of jobs that can be created from renewable energy is very significant.

We had very serious flooding in Whalley and Darwen within the last year and weather patterns across the globe tell us that this is a direct consequence of global warming.

The Hoddlesden Moss wind farm is a neutral technology that does not emit dangerous fumes, it does not contaminate our air or water, it doesn't poison our earth, it does not contribute to resource depletion, it does not bring enormous volumes of traffic or create noise and light pollution. The wind farm is passive, it does not harm birds or other wildlife, the proposal enhances our lovely peat moss with a restoration plan, it brings local work by employing local traders where possible, it does not use enormous volumes of drinking water and create masses of radioactive waste, it does not use chemicals or leave a legacy of radioactive waste, it does not involve processing radioactive material or burning fossil fuels.

The Hoddlesden Moss wind farm is a perfect development that will generate much needed renewable energy for 1500 homes and offset 2600 tonnes of carbon per year. The scheme offers a much needed community fund that will help towards community investment at a time when our Council budgets are being savagely cut by a government that appears not to have a viable energy policy. As you know on shore wind is the cheapest form of electricity generation and we should embrace as much of it as we can while we can.

Name RAISE HARRISON

Address 16 FOTHERGILL ST

COLNE

BB8 9AS

Signature



Date 27/9/16

Name MARGARET SMITH
Address 68 ALBION STREET
LANCASHIRE
BB9 7PT

Kate McDonald – Planning Department
Blackburn with Darwen Borough Council
Town Hall
King William Street
Blackburn
BB1 7DY

For the attention of Kate McDonald

Dear Kate

**Can you please register my support for
Reference - 10/16/0704 - Hoddlesden Moss Wind Farm**

The proposed wind farm is an excellent idea and should be approved because

Wind power reduces the need for expensive nuclear power station that take years to come on line and leave a toxic legacy for thousands of years.

More renewable energy negates the need for high risk fracking in Lancashire that poisons water, pollutes air and has serious health effects.

Hoddlesden Moss is a good location as can be seen from the turbines over the Grane Road. Building turbines on the moss means no compromise of agricultural land. Many Scottish wind farms are built on peat bogs.

The wind farm does not compromise local wildlife and after the peat restoration plan is envisaged the project will deliver net biodiversity gains and significantly enhanced wildlife.

The project is an ideal opportunity to enhance the quality of the peat land without Council investment.

Walkers can enjoy the therapeutic nature of the turbines as they do over the Grane Rd and at Scout Moor.

The wind farm will offset 2600 tonnes of carbon per year which will help the local carbon reduction target and is consistent with UK and European plans to reduce carbon emission.

The wind farm will generate enough energy for around 1500 local homes and this should be encourage. It will also invest in local communities by offering local employment and community investment of £15k/year thereby reducing the burden on reducing council budgets.

The Hoddlesden Moss Wind farm does not have any negative implication and should be approved and future renewable investment encouraged.

Signed



I SUPPORT the Planning Application 10/16/0704

RE- Planning Application : Installation of 3 wind turbines, hub height of 46m, to tip height 76.5m, to include all ancillary works.

I write in connection with the above planning application. I wish to SUPPORT strongly this application for the reasons below.

The Climate Change Act 2008 commits Britain to reduce CO₂ emissions. A recent report commissioned by the Offshore Wind Programme Board has shown a fall in energy price. Onshore wind turbines as those in planning application 10/16/0704 have the potential to provide clean affordable renewable energy, and be part of a national development and manufacturing renewable future. Any development on Huddlesden Moss must adhere to the landscape and Visual Impact Assessment and the Ecological Protection Plan given the nature of the area. Wind turbines placed sensitively in the environment will help to provide renewable clean energy without producing greenhouse gasses, and more acceptable than fossil fuels & fracking.

I would be grateful if you could add my SUPPORT to the planning application with immediate effect.

Name MRS D COOPER

Signature 

Address 16 WATERSIDE TERR

WATERSIDE

NI DAWEN

BR 3 3PD

Contact Number _____

Email Address _____

As a resident of Edgworth, I support the application for three wind turbines at Hoddiesden and Aushaw Moss reference 10/16/0704.

It is important that we develop low carbon power generation to reduce global warming. It is also important that we do this at the lowest possible cost to protect people against rising fuel bills. Onshore wind power is about half the cost of offshore, and on current trends will become cheaper than gas generated power. This development in particular is also helping to sustain a local business.

It is a myth that local residents are opposed to turbines. People in the immediate vicinity of wind turbines usually object very vocally to such applications, partly through an unproven fear of the effect on property values. However I won a contested seat on North Turton parish council about 12 years ago by campaigning in favour of a wind turbine application here at the time. All the evidence shows that the wider community, here and generally, supports these developments. I have walked in many rural areas and in general find turbines an interesting, rather than obtrusive, addition to the landscape.

I urge you to approve this application.

Kenneth Graeme McIver
8 Foxdale Close
Edgworth
BL7 0BJ