



Planning Inspectorate
Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Hope Moor Wind Farm

Case Reference: EN0110038

Adopted by the Planning Inspectorate (on behalf of the Secretary of State)
pursuant to Regulation 10 of The Infrastructure Planning (Environmental
Impact Assessment) Regulations 2017

09 July 2026

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1. INTRODUCTION

- 1.0.1 On 29 May 2026, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Fred. Olsen Renewables Ltd. (the applicant) under regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) for the proposed Hope Moor Wind Farm (the proposed development). The applicant notified the Secretary of State (SoS) under regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and by virtue of regulation 6(2)(a), the proposed development is 'EIA development'.
- 1.0.2 The applicant provided the necessary information to inform a request under EIA regulation 10(3) in the form of a Scoping Report, available from:
- 1.0.3 <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN0110038/documents>
- 1.0.4 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the proposed development as currently described by the applicant. This Opinion should be read in conjunction with the applicant's Scoping Report.
- 1.0.5 The Inspectorate has set out in the following sections of this Opinion where it has / has not agreed to scope out certain aspects / matters on the basis of the information provided as part of the Scoping Report. The Inspectorate is content that the receipt of this Scoping Opinion should not prevent the applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects / matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects / matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 1.0.6 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in appendix 1 in accordance with EIA regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.0.7 The Inspectorate has published a series of advice pages, including '[Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#)'. AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their ES.
- 1.0.8 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:

['Nationally Significant Infrastructure Projects: Advice pages'](#)

- 1.0.9 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (e.g. on formal submission of the application) that any development identified by the applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or associated development or development that does not require development consent.

2. OVERARCHING COMMENTS

2.1 Description of the Proposed Development

(Scoping Report Section 2)

ID	Ref	Description	Inspectorate's comments
21.1	Paragraph 2.5.52 and Appendix 2A	Grid connection infrastructure including between onsite substation and offsite substation and to the transmission network infrastructure	The Inspectorate acknowledges the approach in Scoping Report Appendix 2. The Inspectorate considers, that in this instance, the applicant should clearly justify the position with regards to the grid connection. The Inspectorate advises that where uncertainty remains and detailed environmental information is not available, the applicant should explain how the current grid connection corridor has been defined and provide an assessment of the grid connection at a level that is proportionate to the environmental information that is available and the level of certainty of the grid connection route. This will demonstrate that a viable connection exists and whether any environmental issues are likely to arise from that connection. Such an assessment can be provided as an appendix within the ES and should be used to inform the cumulative assessment of the project with the grid connection, and subsequently with other development within the zone of influence of the Project and the grid connection.
212	Paragraph 2.5.42	Concrete batching	The Scoping Report states that it is currently unknown if concrete would be batched on site or not and sets out what the batching equipment may include in paragraph 2.5.42. It proposes to assess potential likely significant effects (LSE) from the process including abstraction of water and production of wastewater. The ES should assess LSE across other chapters such as (but not limited to) traffic and transport, carbon and climate change, hydrology and hydrogeology and air quality where an impact pathway exists. Where optionality remains in the ES, the worst-case scenario should be assessed in each relevant chapter. The ES should set out, and secure relevant mitigation measures applied in line with the mitigation hierarchy.

ID	Ref	Description	Inspectorate's comments
213	Paragraph 2.5.9	Micro-siting	The ES should explain how environmental constraints and potential LSE have informed the micro-siting of infrastructure within the proposed development site.
214	Paragraph 2.5.28	Impacts to peat	The Scoping Report proposes to minimise impacts to peat by routing haul roads through shallower areas of peat. The ES should demonstrate that the mitigation hierarchy has been applied in full including to firstly avoid areas of peat / deep peat where possible. The ES should explain why this is not possible before considering mitigation to minimises impacts. For clarity, effects from impacts to peat should be assessed across the relevant chapters of the ES including (but not limited to) carbon and climate change, ecology, hydrology and hydrogeology, geology, soils and ground conditions etc. The assessments should address all relevant peatland processes such as changes in hydrology, compression, density, drying, shrinkage, subsidence, oxidation and instability and assess all potential impacts across construction, operation and decommissioning where they are likely to lead to significant effects. An appropriate study area should be applied and justified based on the potential extent of the impact being assessed. The applicant should seek agreement on the scope of assessment across the relevant chapters of the ES with the relevant consultation bodies.

2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 3)

ID	Ref	Description	Inspectorate's comments
221	n/a	Impacts to Sites of Special Scientific Interest (SSSIs)	The Scoping Report applies different approaches to the identification of SSSIs across chapters 7, 8 and 9. Attention is drawn to NEs comment on the approach to assessing SSSIs throughout the ES. The applicant should seek agreement on the approach to assessing impacts to SSSIs with the relevant consultation bodies.
222	Paragraph 3.9.3	Professional judgement	This is proposed to be applied where it is not possible for sensitivity or magnitude to be quantified. Where professional judgement is used in the assessment of LSE, the ES should explain the reasoning behind the judgement, drawing on any relevant consultation, guidance and evidence.
223	Paragraph 3.9.4	Specific scenarios	Scoping Report paragraph 3.9.4 states that specific scenarios would determine whether a moderate effect is significant or not. The ES should explain what and how specific scenarios would influence significance of effects in relation to the specific chapter assessments.
224	n/a	Geology and Hydrology	The Scoping Report currently addresses hydrology and hydrogeology as one aspect topic and geology, soils and ground conditions as another aspect topic. There are a number of interacting effects between soils and hydrology and therefore the applicant should consider and seek to agree with relevant consultation bodies how assessments are to be undertaken to ensure all likely significant effects are assessed and to ensure there is appropriate cross reference between chapters.
225	Table 3-2	Cumulative effects	It is noted that a number of potentially cumulative projects are not identified in Table 3-2 eg East Coast Hydrogen Teeside Pipeline and East Coast Hydrogen Humber Pipeline among others. The applicant should seek to agree the relevant cumulative

ID	Ref	Description	Inspectorate's comments
			developments to be included on the long and short lists for the assessment of cumulative effects with the relevant consultation bodies.
226	Section 3.12	Transboundary	The Inspectorate on behalf of the SoS has considered the proposed development and concludes that the proposed development is unlikely to have a significant effect either alone or cumulatively on the environment in a European Economic Area State. In reaching this conclusion the Inspectorate has identified and considered the proposed development's likely impacts including consideration of potential pathways and the extent, magnitude, probability, duration, frequency and reversibility of the impacts. The Inspectorate considers that the likelihood of transboundary effects resulting from the proposed development is so low that it does not warrant the issue of a detailed transboundary screening. However, this position will remain under review and will have regard to any new or materially different information coming to light which may alter that decision. Note: The SoS' duty under regulation 32 of the 2017 EIA Regulations continues throughout the application process. The Inspectorate's screening of transboundary issues is based on the relevant considerations specified in the annex to its Advice Page 'Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process', links for which can be found in paragraph 1.0.7 above.

3. ENVIRONMENTAL ASPECT COMMENTS

3.1 Landscape and Visual

(Scoping Report Section 5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.1.1	Table 5-5	Short term, temporary impact of the proposed development on landscape features outside of the site area –construction and decommissioning	The Scoping Report proposes to scope this matter out on the basis that the landscape outside of the site area would not be physically affected by the project. The Inspectorate agrees that this matter can be scoped out on this basis the ES demonstrates no land outside of site area would be physically affected. The applicant should seek agreement with the relevant consultation bodies.
3.1.2	Table 5-5	Short term, temporary impact and long-term, reversible impacts of the construction and decommissioning of the proposed development on visual receptors / views with limited or no visibility – all phases	The Scoping Report states that visual receptors and views with limited or no visibility do not have the potential for significant visual effects. On the basis the ES defines what constitutes a 'limited' visibility and explains why this would not lead to LSE and demonstrates which receptors have limited or no visibility based on the final ZTV, the Inspectorate agrees that this matter can be scoped out of further assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
31.3	Table 5-5	Potential for long-term, reversible impacts of the operation and maintenance of the proposed development on landscape fabric outside of the site area – during operation	The Scoping Report states that landscape outside the site area would not be physically affected by the proposed development. The Inspectorate agrees that this matter can be scoped out on this basis the ES demonstrates no land outside of site area would be physically affected. The applicant should seek agreement with the relevant consultation bodies.
31.4	Table 5-5	Short term, temporary impact and long-term, reversible (daytime) impacts of the proposed development on landscape character Landscape Character Areas (LCAs) beyond 20 km – all phases	The Scoping Report states that LCAs beyond 20 km are shown on the scoping Zones of Theoretical Visibility (ZTVs) to have distant, limited or no visibility and therefore do not have the potential for likely significant visual effects. However, the Inspectorate notes concern from consultation bodies around the application of 20km to scope out impacts to LCAs. The Inspectorate also notes a lack of consideration for long distance views for landscape receptors eg from ridges, although long distance views are referred to in relation to cultural heritage receptors in paragraph 6.6.8. Additionally, the ZTV in its current form shows that LCAs beyond 20km will have visibility to the proposed development in some directions. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
31.5	Table 5-5	Short term, temporary impact and long-term, reversible impacts of the proposed development on designated landscapes described in Table 5-2 – all phases for the specifically identified receptors	The Scoping Report states that justification for each designated landscape scoped out of the assessment is provided in Table 5-2. This includes reasoning based on distance and theoretical visibility based on the ZTV displayed in Scoping Report Figure 5.8 for the following assets: • Lake District National Park (LDNP) • Durham Castle and Cathedral World Heritage Site • Middleton Lodge Registered Park and Gardens (RPG) • Aske Hall RPG • Temple Grounds RPG • St Nicholas Richmond RPG • Constable Burton Hall RPG • Burn Hall RPG • Croxdale Hall RPG • Old Durham Gardens • Japanese Garden at Grantley Hall RPG • Parcevall Hall RPG • Queen's Garden RPG • Image Garden RPG • Appleby Castle RPG The Inspectorate agrees that on the basis the final ZTV presented in the ES reflects that there would be negligible or no visibility to these receptors or else provides appropriate

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			evidence to demonstrate no LSE, these receptors can be scoped out of further assessment. To note, this agreement does not relate to the assessment of these receptors in the Cultural Heritage and Archaeology Chapter of the ES.
31.6	Table 5-5	Short term, temporary impact and long-term, reversible impacts of the proposed development on designated landscapes described in Table 5-2 – all phases for the specifically identified receptors	The Inspectorate does not agree to scope the following sensitive receptors out of further assessment on the basis the ZTV does not sufficiently demonstrate there would be no theoretical visibility. • North York Moors National Park • Nidderdale National Landscape (NNL) • Studley Royal Park including the ruins of Fountains Abbey WHS • Forcett Hall Registered Park and Gardens (RPG) • Hornby Castle RPG • Ramshaw Hall RPG • Auckland RPG • Brancepeth Castle RPG • Windlestone Hall RPG • Hardwick Park RPG • Ceddesfeld Hall RPG • Wynyard RPG • West Cemetery Darlington • South Park Darlington • Landscape at Cummins Engine Factory Darlington

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			• Ropner Park • Albert Park RPH • Arncliffe Hall RPG • Throp Perrow RPG • Norton Conyers RPG • Hackfall • Studley Royal RPG • Swinton Castle RPG The ES should include an assessment of LSE on these receptors or else demonstrate with sufficient evidence that there is no pathway for LSE. The applicant should seek agreement from the relevant consultation bodies on the approach. To note, this agreement does not relate to the assessment of these receptors in the Cultural Heritage and Archaeology Chapter of the ES.
3.1.7	Table 5-5	Potential for long-term, reversible impacts (night-time) of the operation and maintenance of the proposed development on visual receptors / views beyond 20km – operation	The Scoping Report states that potential significant effects of visible aviation lighting are considered unlikely beyond 20km, in line with NatureScot guidance. The Inspectorate agrees that this matter can be scoped out of the assessment on this basis.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
31.8	Table 5-5	Cumulative effects that may arise as a result of cumulative wind farm developments below 50m and non-wind local developments (major applications) beyond 10km from the proposed development – all phases	The Scoping Report states that there is no potential for significant cumulative effects from other wind farm developments due to a predicted lack of cumulative interaction and / or influence given the location of non-wind farm development beyond 10km or and the location of wind farm development beyond 10km where it is less than 50m in height. It is unclear why 10km has been applied to scope out these development types. On this basis, the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly, the ES should include an assessment of this matter or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effect.

ID	Ref	Description	Inspectorate's comments
31.9	Section 5.2 Paragraph 5.2.1 Paragraphs 5.2.2 Section 5.6 Figures 5.2 to 5.9 Paragraphs 5.6.10 to 5.6.14	Study Area – visual effects Study Area – landscape character effects	The Scoping Report considers that the maximum radius within which a significant effect could occur is 45 km given the height of the wind turbines that are being considered and landscape designations and visual receptors. The Inspectorate considers that the LVIA Study Area and ZTV and study area for LCAs should be based on the furthest extent of likely significant effects and that the applicant should seek agreement on the approach with the relevant consultation bodies to support an appropriate study area presented in the ES.

ID	Ref	Description	Inspectorate's comments
3.1.10	Section 5.5	Mitigation and enhancement	The Scoping Report states that mitigation of landscape and visual effects will be a central consideration in this design process of the proposed development. For the avoidance of doubt, the ES should describe any relevant mitigation measures including but not limited to how the siting has sought to minimise potential landscape and visual effects and any other mitigation measures identified from the LVIA assessment and explain how delivery of these measures is secured. Any specific enhancement plans should also be clearly set out in the ES and secured through the DCO.
3.1.11	Paragraphs 5.6.23 Table 5-4	Lighting	Potential for long term, reversible effects on views and visual amenity experienced by people from principal visual receptors and representative viewpoints arising because of visible aviation lights has been scoped into the assessment. The Scoping Report states that details of the lighting requirements for the proposed development are currently being defined along with potential mitigation measures. The ES should describe the light levels likely to be generated during construction, operation and decommissioning of the proposed development. Where mitigation is being relied on to avoid likely significant effects this should be described, including any embedded mitigation such as the design of the lighting or layout.
3.1.12	Paragraphs 5.6.22 to 5.6.24	Photomontages	The Scoping Report states that photographs will be captured from four of the readily accessible viewpoints at dusk and visualisations will be prepared to represent the effects of lighting on these views. The assessment approach and night-time visualisations will be in accordance with NatureScot guidance. The applicant should justify the choice of representative viewpoints for the photomontages where it is considered that significant effects are likely to occur. The applicant should consult and where possible agree on the number and location of photomontages with the relevant consultation bodies. The ES should include confirmation of the consultation undertaken, together with evidence of agreement about the final viewpoints selected. Where any disagreement remains, an explanation as to how the final selection was made should be provided.

ID	Ref	Description	Inspectorate's comments
			The photomontages should show all components of the proposed development and demonstrate the proposed development before and after mitigation to enable a worst-case scenario to be fully understood. The applicant should provide photomontages for the chosen representative viewpoints during winter as well as in summer for the current baseline and future year scenarios to allow an assessment of the maximum visibility scenario and illustrate the seasonal variation in screening provided by vegetation planting in line with the Landscape Institute's guidance, such as "Guidelines for Landscape and Visual Impact Assessment" (GLVIA3).
3.1.13	n/a	Protected landscapes	Noting the duty on public bodies to seek to further the purposes of National Landscapes, the ES should provide a full assessment of LSE taking into account the special qualities of the National Landscapes and demonstrate how the mitigation hierarchy has been applied to minimise potential impacts.

3.2 Archaeology and Cultural Heritage

(Scoping Report Section 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
321	Table 6-7	Settings effects on designated heritage assets – construction	Scoping Report Table 6-7 proposes to scope out settings effects on designated heritage assets because impacts on the setting of designated heritage assets from construction activity are considered to be minimal at most and temporary in nature. However, this is contradicted by Scoping Report paragraph 6.4.3 which states that designated heritage assets within 10km would be subject to a settings assessment and further scoping based on these assessments. It is also contradicted by Table 6-6 which states that short term change within the setting of a heritage asset could affect their cultural significance. Furthermore, paragraph 6.6.9 states that assets that have been scoped in may be scoped out and vice versa, dependent on the final layout. Given the contradictory nature of the information the Inspectorate is not in a position to agree to scope this matter at this stage from the assessment at this stage. Accordingly, the ES should include an assessment of this matter or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effect.
322	Table 6-7	Settings effects on designated heritage assets outside of 5km (including Grade II listed buildings, Registered Parks	The Scoping Report proposes to scope out setting effects on Grade II listed buildings and Registered Parks and Gardens that are outside of 5km of the proposed development where specific views do not contribute to their significance and/or to the ability to appreciate and experience them. This would be determined by professional judgement and experience of other comparable projects.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		and Gardens and Conservation Areas) – operation and maintenance	The Scoping Report also refers to scoping out conservation areas beyond 5 km of the proposed development site on the basis significance derives from character and features rather than the wider landscape. However, this is contradicted by Scoping Report paragraph 6.4.3 which states that designated heritage assets within 10km would be subject to a settings assessment and further scoping based on these assessments. It is also contradicted by Table 6-6 which states that short term change within the setting of a heritage asset could affect their cultural significance. It is unclear whether this applies to these designated heritage assets or not. Furthermore, paragraph 6.6.9 states that assets that have been scoped in may be scoped out and vice versa, dependent on the final layout. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
323	Table 6-7	Setting effects on designated assets outside of the Zone of Theoretical Visibility (ZTV) – operation and maintenance	The Scoping Report proposes to scope out heritage assets outside of the Zone of Theoretical Visibility (ZTV) and where important views associated those assets' approaches, and third points of appreciation also fall outside of the ZTV. The Inspectorate notes that the guidance references 'Historic England (2017). The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning (GPA 3, 2nd edition)' states that the significance of heritage assets provided by their setting is not solely based on views. The Inspectorate considers that other factors, such as noise, have potential to impact on setting which do not share the same impact zone as visual impacts. On this basis, the Inspectorate does not agree to scope this matter out at this stage. The ES should provide an assessment of these matters where significant effects are likely to

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			occur. The applicant should seek agreement on the approach with the relevant consultation bodies.
324	Appendix 6B	Assets scoped out in Appendix 6B – all phases	A number of individual assets are scoped out in Scoping Report Appendix 6B. Reasoning is based on whether assets fall within the ZTV and whether setting is likely to be affected including consideration of long-distance views. Some assets have no reasoning provided eg How Tallon Scheduled Monument and it is unclear whether impacts such as noise have been considered or variations in seasons have been taken into account. Additionally, in relation to IDs 3.2.1, 3.2.2 and 3.2.3 above, the Inspectorate considers that the approach to determining the effects on setting is unclear and contradictory. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
325	Table 6-7	Direct effects – decommissioning	The Scoping Report proposes to scope this matter out on the basis that effects are likely to be similar to or less than construction effects, and because it is unlikely for there to be any direct impacts on known heritage assets from decommissioning of the proposed development. On the basis that direct effects are scoped in for direct effects during construction in Table 6-6 the Inspectorate considers that there is potential for direct effects on heritage assets during decommissioning. Therefore, the Inspectorate does not agree to scope this matter out and LSE during decommissioning should be scoped in for further assessment.
326	Table 6-7	Settings effects on designated heritage	The Scoping Report states that the heritage assets with a lower than minor significance of effect resulting from the proposed development in isolation with respect to setting effects

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
		assets with lower than minor significant effects – cumulative effects	on designated heritage assets will not be taken forward for assessment for cumulative effects within the ES chapter, as these assets are unlikely to be susceptible to significant cumulative effects. The Inspectorate agrees that this matter can be scoped out of the assessment on this basis.
327	Paragraph 6.7.1	Heritage assets within the 10km Study Area as listed in Scoping Report paragraph 6.7.1	The Scoping Report states that it is anticipated that the asset types listed in paragraph 6.7.1 are unlikely to give rise to a significant effect from the proposed development because their cultural significance lies wholly or predominantly within their fabric and/or the lack of change which the proposed development would cause in respect to elements of setting which contribute towards their significance. However, this is contradicted by Scoping Report paragraph 6.4.3 which states that designated heritage assets within 10km would be subject to a settings assessment and further scoping based on these assessments. It is also contradicted by Table 6-6 which states that short term change within the setting of a heritage asset could affect their cultural significance. It is unclear whether this applies to these designated heritage assets or not. Furthermore, paragraph 6.6.9 states that assets that have been scoped in may be scoped out and vice versa, dependent on the final layout. It is also unclear whether impacts such as noise have been considered. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Description	Inspectorate's comments
328	Section 6.2 Figure 6.1	Study Area	A Study Area of up to 10 km from the proposed wind turbine locations has been defined in Figure 6.1. The ES should justify the study area used based on the worst-case scenario(s) and receptors likely to experience a significant effect and seek agreement with the relevant consultation bodies.
329	Paragraphs 6.4.4 to 6.4.5 6.4.11 to 6.4.17 6.4.28	Methodology – determining significance	The Scoping Report states that significant effects will be determined through professional judgement, having regard to the National Highways' Design Manual for Roads and Bridges (DMRB). The Inspectorate advises that the applicant should seek to agree the approach with the relevant consultation bodies, noting that DMRB guidance is not specific to wind farm development. In the event that the applicant's approach to recording significance of an asset deviates from any advice, the ES should explain why and provide justification based on relevant evidence and professional opinion.
3210	Table 6-5 Paragraph 6.6.13	Photomontages	The Scoping Report states that professional judgement has been exercised to determine the approximate locations of selected photomontage locations within groups of heritage assets and visualisations will not be produced for each individual asset. If any viewpoints cannot be accessed and photographs cannot be taken, wirelines will be produced. The assessment should be supported by visualisations such as photomontages where possible to help illustrate the likely impacts of the proposed development on heritage assets. The applicant should consult and where possible reach agreement on the number and viewpoint location of photomontages with relevant consultation bodies, including the host local authorities, Yorkshire Dales National Park Authority and Historic England. Cross reference in the ES should be made to the LVIA assessment to avoid duplication.
3211	Table 6-6 and paragraph 6.4.33	Archaeological surveys	The Inspectorate notes that only targeted site inspections are proposed for further surveys and evaluative surveys such as trial trenching and geophysical surveys would be considered if required to clarify archaeological potential. It is unclear what would trigger such requirements and how archaeological baseline data will be characterised.

ID	Ref	Description	Inspectorate's comments
			The ES should set out the approach to determining the archaeological baseline and seek agreement with the relevant consultation bodies.
3212	Table 6-6	Dewatering effects	Table 6-6 refers to indirect effects of dewatering on heritage assets from construction-related activities. The ES should provide a full description of any such activities and present an assessment of any significant effects where they are likely to occur.

3.3 Ecology

(Scoping Report Section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
33.1	n/a	Lighting impacts – operation	The Scoping Report identifies the potential for significant effects upon protected species from indirect lighting disturbance during construction but does not consider the potential for disturbance from operational lighting. The Inspectorate notes that paragraph 5.6.23 of the Scoping Report describes potential wind turbine lighting requirements. The ES should assess impacts on ecological receptors from lighting during operation as well as construction where significant effects are likely to occur.
33.2	Table 7-7	Indirect impacts on Brignall Banks SSSI – construction	The Scoping Report states that this SSSI is hydrologically connected to the site via the Gill Beck but proposes to scope out an assessment on the basis that embedded mitigation measures would sufficiently reduce potential risks to notified features to negligible levels. However, the extent to which the avoidance and mitigation measures proposed in Table 7-5 would reduce potential risks to the SSSI is unclear. Given the lack of evidence to demonstrate that significant effects would not occur and taking account of the national importance of the SSSI designation, the Inspectorate does not agree to scope this matter out at this stage. Accordingly, the ES should provide an assessment of the potential effects of the proposed development on Brignall Banks SSSI during construction where they are likely to be significant and should demonstrate that all potential pathways which would extend beyond the site boundary (eg deposition of pollutants, emissions to water, noise, etc) have been adequately considered. Water quality mitigation measures to prevent water pollution impacts to the SSSI that would be included in the proposed Construction Environmental Management Plan (CEMP) should be outlined.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
333	Table 7-7	Local Wildlife Sites (LWS) > 200m from the scoping boundary and those with no mobile notified features (e.g. bats) and/ or no hydrological connection – construction	The Scoping Report seeks to scope these receptors out due to the lack of mobile notified features and/or hydrological connections from the proposed development to these LWSs, and states that potential impacts are not anticipated. In the absence of evidence regarding the sites and impact pathways and noting the location of Hud Scar/Hope Scar LWS directly adjacent to the site's northern boundary as shown in Figure 7.2 of the Scoping Report, the Inspectorate does not agree to scope these receptors out at this stage. The Inspectorate notes proximity of other non-statutory designated sites within 2km of the site, including Low Easegill Grassland Site of Importance for Nature Conservation (SINC) and Lockey Wood SINC which are identified as being adjacent to the scoping boundary. The ES should include an assessment of likely significant effects on non-statutory designated sites or otherwise present a justification as to why significant effects are not likely to occur.
334	Table 7-7	Impacts to water vole and badger – construction	The Scoping Report seeks to scope out this matter as the combined mammal survey for badger and water vole undertaken in 2024 did not record any of these species. The Scoping Report also states that habitats on site are considered suboptimal for these mammals due to limited opportunities for foraging and/or shelter. Pre-construction checks for the presence of badger and other protected species are additionally proposed. On this basis, the Inspectorate agrees to scope out impacts to water vole and badger during construction.
335	Table 7-7	Impacts to otter – construction	The Scoping Report proposes to scope out otter on the basis that the combined mammal survey did not record any species and lack of suitable habitat present. However, the Inspectorate notes that Table 7-7 contradicts Table 7-4 where it states that the potential future presence of otter cannot be entirely ruled out and subsequently proposes to take the species forward in the assessment.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			In the absence of evidence of agreement with consultation bodies, the Inspectorate considers that this matter cannot be scoped out of the assessment at this stage. The ES should provide an assessment of LSE to otter or else demonstrate there would be no credible impact pathway for LSE.
336	Table 7-7	Impacts to white-clawed crayfish – construction	The Scoping Report proposes to scope out white-clawed crayfish based on lack of white-clawed crayfish presence in surveys undertaken in 2024, as documented in the White-Clawed Crayfish Technical Report of Appendix 7C. However, the applicant's attention is directed to comments from the Environment Agency (Appendix 2) regarding the presence of white-clawed crayfish in a nearby tributary and need to consider carrying out an additional white-clawed crayfish survey. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope this receptor out from the assessment at this time. The ES should include information demonstrating agreement with the relevant consultation bodies and the absence of a LSE or include an assessment of this matter.
337	Table 7-7	Killing and injury to low collision risk bat species – operation and maintenance	The Scoping Report identifies the presence of brown long eared bat, Daubenton's bat, Natterer's bat, and whiskered bat within the site, based on bat activity surveys conducted between April and October 2024. Potential injury and mortality effects on these species are proposed to be scoped out on the basis that they are considered to be at low collision risk according to the NatureScot et al. (2019) collision risk categories, as summarised in Table 7-3 of the Scoping Report. The Inspectorate agrees that this matter can be scoped out on this basis.
338	Paragraph 7.3.7	Shaw Beck Gill SSSI – all phases	The Scoping Report proposes to scope out impacts to Shaw Beck Gill SSSI which has been designated solely for geological interest. Considering the proposed development is located within the Impact Risk Zone (IRZ) of this SSSI, and noting the sensitivity of the geological site to impacts on active geomorphological processes, including changes to

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			drainage patterns, the Inspectorate does not agree to scope this receptor out at this stage. Accordingly, the ES should either present an assessment of likely significant effects on this receptor or provide information to demonstrate the absence of a pathway for significant effects.
33.9	Paragraph 7.3.7	Indirect peat impacts to North Pennine Moors Special Area of Conservation (SAC)	Whilst the Scoping Report states that the SAC is located within a separate water catchment, the proposed development would be situated on predominantly peat soils that are likely to be disturbed by activities such as infrastructure installation and dewatering. The Inspectorate therefore considers that the potential for hydrological connectivity and associated effects on the SAC cannot be discounted at this stage. The ES should identify the relevant hydrological unit(s) that have potential to be impacted and assess any potential LSE on sensitive receptors within those units eg North Pennine Moors SAC. or provide sufficient evidence to demonstrate that no pathway for LSE exists.
33.10	n/a	Water abstraction – North Pennine Moors SAC	Given the uncertainty surrounding the need for water abstraction (Scoping Report paragraph 2.5.42), the Inspectorate considers that any hydrological connectivity between a potential abstraction source and the North Pennine Moors SAC and any other potential impacted sensitive receptors should be identified and LSE assessed in the ES. The applicant's attention is drawn to comments from Natural England (Appendix 2) in this regard.

ID	Ref	Description	Inspectorate's comments
33.11	n/a	Sensitive environmental information	Under Regulation 12(5)(g) of the Environmental Information Regulations 2004 (EIR), public bodies have a responsibility to avoid releasing sensitive environmental information that could bring about harm to sensitive or vulnerable ecological features.

ID	Ref	Description	Inspectorate's comments
			Sections of the ES containing specific survey and assessment data relating to the location of sensitive species (e.g., badgers, rare birds, and plants) or other vulnerable environmental features should be provided in separate annexes by the applicant. This approach reduces the sensitive ecological feature's risk of disturbance, damage, persecution, or commercial exploitation arising from publication. The applicant's approach should be proportionate and only use these separate annexes for species where there is a genuine risk of harm. All other assessment information should be included in an ES chapter, as normal, with a placeholder providing a justification as to why annexes have been withheld and that a full version of the ES has been submitted to the Inspectorate.
33.12	Figure 7.1	North Pennine Dales Meadows SAC	Paragraph 7.3.7 of the Scoping Report states that only one SAC (North Pennine Moors SAC) is present within 10km of the site. However, Figure 7.1 of the Scoping Report also shows the North Pennine Dales Meadows SAC to be located within the 10km study area. The ES should assess impacts on the North Pennine Dales Meadows SAC where there is potential for LSE or else demonstrate an absence of LSE with appropriate supporting evidence. Consideration should be given to any potential for hydrological connectivity between the site and the habitats within the SAC, as well as any impacts upon water supply or water quality, as noted in the comments from Natural England (Appendix 2).
33.13	n/a	Borrow pits	Paragraph 1.1.3 of the Scoping Report identifies borrow pits to be a component of the proposed development, as addressed in ID 3.6.9. Mitigation measures to prevent any dewatering of peat within borrow pits should be considered and outlined in the ES and any appropriate cross reference to other relevant ES chapters should be made. The applicant's attention is drawn to comments from Natural England (Appendix 2) in this regard.
33.14	Paragraphs 7.3.19 to 7.3.21	Brown trout population and other fish species	The Scoping Report notes the presence of a breeding population of brown trout present in the catchment of the Arndale Beck and Moresdale Gill watercourses identified through

ID	Ref	Description	Inspectorate's comments
			an electro-fishing survey of fish assemblage in 2024, but states that no further surveys are proposed. This appears to contradict the Fish Survey Report, provided at Appendix 7B, which proposes to scope in locations along the Moresdale Gill and Arndale Beck for further survey. Appendix 7B further notes the potential for the proposed development to adversely affect fish populations within the site in the absence of appropriate mitigation and pollution prevention. Accordingly, the ES should clarify whether brown trout and other fish and freshwater species are present as important ecological receptors and should include an assessment of effects on such species, where significant effects are likely to occur. This should be supported by further surveys where appropriate, and the applicant should seek agreement on the methodology with the relevant consultation bodies.
33.15	Table 7-6	Loss of irreplaceable peat bog habitat	The Inspectorate notes that any permanent loss of irreplaceable blanket bog habitat would likely not be limited to the construction phase. Any prolonged impacts related to the long-term peatland habitat loss should therefore be considered during the operational phase and, where relevant, the decommissioning phase of the proposed development. The applicant's attention is drawn to the comments of Natural England at Appendix 2 of this Scoping Opinion regarding the need to consider the total permanent habitat loss, including peat habitat, that would arise from the proposed development. The ES should also confirm how the mitigation hierarchy has been applied to the siting and design of the proposed development in/around peatland habitat, and should appropriately cross reference to the Geology, Soils and Ground Conditions and Hydrology and Hydrogeology Chapters where relevant.
33.16	n/a	SSSIs underpinning North Pennine Moors SAC and North	Lovely Seat - Stainton Moor SSSI, Arkengarthdale, Gunnerside and Reeth Moors SSSI and Bowes Moor SSSI that partially underpin the North Pennine Moors Special Protection Area (SPA) and SAC, and Arkle Beck Meadows, Whaw SSSI and Fothering Holme SSSI that partially underpin the North Pennine Dales Meadows SAC are not considered in the Scoping Report as they do not fall within the assigned 2km study area for nationally

ID	Ref	Description	Inspectorate's comments
		Pennine Dales Meadows SAC	designated sites. However, the Inspectorate considers that insufficient evidence has been provided to rule out impact pathways to the SSSI features of special interest. Accordingly, direct and indirect effects on underpinning SSSIs should be assessed in the ES where significant effects are likely to occur.
33.17	Paragraph 7.2.1	Study area	The Scoping Report proposes a 10km and 2km study area for international and national designated sites, respectively. The ES should ensure the study area for each ecological receptor reflects the project's Zone of Influence (ZoI) rather than being based on a fixed distance, particularly in relation to mobile species such as fish and bats. Any impact risk zones identified for designated sites should also be considered. The applicant should seek agreement on appropriate study area(s) with the relevant consultation bodies.
33.18	n/a	Air Quality impacts – all phases	It is unclear from Scoping Report Chapters 7 and 15 what ecological receptors would be assessed in relation to air quality impacts. Please see ID 3.11.8 for further information on this matter.

3.4 Ornithology

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
34.1	Paragraph 8.7.2	Designated sites including Cotherstone Moor SSSI, Bollihope, Pikestone, Eggleston and Woodland Fells SSSI, Mallerstand-Swaledale Head SSSI, Lunne Forest SSSI, Swale Lakes SSSI, Upper Teesdale SSSI and Teesdale allotments SSSI – all phases	These sites are proposed to be scoped out on the basis of spatial separation in line with NatureScot guidance where 10km is beyond the core foraging range of most ornithological qualifying features of the SSSIs. The Scoping Report has not identified what ornithological features of these sites are being scoped out, and the Scoping Report states that 10km is beyond the core foraging range of most, rather than all, features. On the basis of the current information provided and in the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate does not agree to scope this matter out. The ES should provide evidence to demonstrate that the specific features of these SSSIs would not have a credible impact pathway in line with relevant guidance or else provide an assessment of LSE. The applicant should seek agreement on the approach with the relevant consultation bodies.
34.2	Paragraph 8.7.3	Impacts from collision risk and displacement to barn owl – all phases	Collision risk and displacement to barn owl are proposed to be scoped out on the basis that embedded measures would be employed during construction – including disturbance buffers and employment of an ecological clerk of works (ECoW) – and the low sensitivity of the species to displacement and collision mortality risk due to low altitude foraging. The Inspectorate notes that Scoping Report paragraph 8.3.29 identifies that there is evidence of barn owl breeding within 2km of the proposed development, although the location is not provided. The Inspectorate considers that there is potential for disturbance

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			impacts to occur for example, noise disturbance or disruption to flight lines. The Inspectorate also notes that Barn Owl would be considered a medium sensitivity receptor. In the absence of information around potential impacts from collision and disturbance, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
343	Paragraph 8.7.4	Impacts from collision risk and displacement to nightjar – all phases	This is proposed to be scoped out on the basis of the spatial separation of suitable breeding habitat and adoption of embedded mitigation measures during construction and decommissioning. This is supported by evidence demonstrating that these species are not significantly displaced or experience collision mortality risks from onshore wind farms. Mitigation is proposed to address potential disturbance during construction as set out in Scoping Report paragraph 8.5.6, including a CEMP, a Bird Disturbance Management Plan (BDMP) and a Landscape and Ecology Management Plan (LEMP) which would include measures such as micro-siting, ecological clerk of works, preconstruction surveys and disturbance buffers. However, no details of the bird disturbance plan are provided. Scoping Report paragraph 8.3.44 states that breeding bird surveys found four locations of male nightjar north of the site with suitable breeding habitat located 100m from any proposed turbine location. Therefore, the Inspectorate considers that there is potential for disturbance and barrier effects eg impacts from noise or disruption of flight lines. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
344	Paragraph 8.7.5	Impacts from disturbance, collision risk and displacement to passerines – all phases	It is not clear from the Scoping Report which passerine species are present within the site, nor the level of sensitivity attributed to any passerine species that may occur within the study area. Therefore, it is uncertain whether potential impacts, including habitat loss, may give rise to significant effects on these species. In the absence of information including agreement with the relevant consultation bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
345	Paragraph 8.7.6	Impacts from disturbance, collision risk and displacement to gulls – all phases	The Scoping Report states that gull species will only be taken forward for detailed assessment where baseline surveys identify regular flight activity linked to breeding, foraging and commuting. The Inspectorate agrees with this approach on the basis the ES clearly establishes what 'regular' flight activity is determined to be and explain what a clear functional link would look like for breeding, foraging and commuting across relevant gull species, taking account of the specific species sensitivity. The ES should also acknowledge that where a species is a feature of a designated site where there is potential for LSE, this should be scoped into assessment. The applicant should seek agreement on the approach with the relevant consultation bodies.
346	Paragraph 8.7.8	Impacts from disturbance, collision risk and displacement to migratory waterfowl – all phases	This is scoped out on the basis that the proposed development is not located within 20km of designated sites for which migratory waterfowl are a feature. Baseline surveys completed to date which are summarised in Scoping Report Table 8.2 are stated not to identify regular use of the turbine area by this species with no aggregations recorded as per paragraph 8.3.47. Additionally, it notes that in line with NatureScot collision risk model, there are typically high avoidance rates.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			On the basis the ES confirms an appropriate definition of 'regular use' and demonstrates that the survey results reflect that migratory waterfowl are not close to meeting or exceeding this definition, the Inspectorate agrees that this matter can be scoped out of the ES. The applicant should seek agreement on the approach with the relevant consultation bodies.
34.7	Paragraph 8.7.10	Impacts from disturbance, collision risk and displacement to other species – all phases	The Inspectorate agrees that where surveys demonstrate only occasional transient records on site, such other species of bird can be scoped out of the ES. The ES should define what is considered 'occasional' and provide survey evidence to support scoping out such species. The applicant should seek agreement on the approach with the relevant consultation bodies.
34.8	n/a	Functionally linked land (FLL) – all phases	The Scoping Report does not propose to identify or assess potential LSE to FLL of designated sites used by ornithology. The ES should identify FLL for ornithological species in relation to populations associated with European designated sites with potential to be impacted by the proposed development. The ES should assess LSE from potential temporary and permanent loss, displacement, noise and visual disturbance, mortality, disruption to flight lines and any cumulative effects.
34.9	Paragraph 8.7.12	Lighting	The Scoping Report proposes to scope out aviation lighting on the basis that baseline studies have not identified the site as important for species susceptible to elevated risks to collisions with lit turbines. However, this does not take into account barrier effects and disturbance and displacement as a result of lighting. Additionally, the effects from other sources of lighting such as during construction are not considered in Chapter 8 of the Scoping Report although Scoping Report paragraph 2.5.16 states that lighting may be required during construction and operation. The ES should assess potential effects from lighting to ornithological features where they are likely to be significant.

ID	Ref	Description	Inspectorate's comments
34.10	Table 8-5	Impact Magnitude	The ES should clarify what would determine the differentiation between the magnitude of the impacts between 'high', 'medium' and 'low' given that the descriptions of what would constitute these magnitudes are mostly the same eg '6 to 20% of population lost or increase in additive mortality' is the threshold for low, medium and high magnitude.
34.11	Paragraph 8.4.25	Surveys	The ES should provide detail on survey timings, frequency, coverage and methods. The applicant should seek agreement on the approach to surveys with the relevant consultation bodies and explain how it accords with relevant guidance. Where there is any deviation from guidance, this should be fully justified. The ES should explain how survey results have informed iterative design of the proposed development to minimise potential effects on ornithological species.
34.12	Table 8-9	Displacement – construction and decommissioning	Whilst displacement is proposed to be assessed during operation, it is not proposed to be assessed during construction or decommissioning. The Inspectorate considers that displacement could occur during construction and continue through operation and during decommissioning. The ES should assess potential significant effects of displacement to ornithological species across multiple phases of the development or justify why displacement during the construction / operational phases is unlikely to occur.
34.13	Table 8-9	Indirect effects	Indirect effects are not proposed to be assessed in Scoping Report Table 8-9. The Inspectorate considers there is potential for indirect effects, for example, changes in prey availability, increased predation risk etc. The ES should confirm whether an impact pathway for indirect effects exists for sensitive ornithological receptors and assess significant effects where they are likely to occur.
34.14	Table 8-9	Cumulative disturbance effects	Cumulative disturbance effects are not proposed to be assessed in Table 8-9 without clear explanation. The ES should either explain why such effects are not likely to be significant or else assess cumulative disturbance effects across all phases where they are likely to be significant.

ID	Ref	Description	Inspectorate's comments
34.15	n/a	Air Quality impacts – all phases	It is unclear from Scoping Report Chapters 8 and 15 what ecological receptors would be assessed in relation to air quality impacts. Please see ID 3.11.8 for further information on this matter.

3.5 Hydrology and Hydrogeology

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
35.1	Paragraph 9.3.29	Hydrological impacts to Brignall Banks SSSI – all phases	This matter is scoped out on the basis the habitat in the SSSI is not considered to be water dependent although it is hydrologically linked to the site as it is adjacent to Gill Beck which has headwater within the proposed development site. The Inspectorate notes that Natural England identify in their consultation response that the headwaters of the tributaries of Gill Beck are priority habitat for the SSSI. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.
352	Table 9-6	Potential adverse impacts to water dependent designated sites – construction	The Scoping Report proposes to scope out effects on water dependent designated sites because it states that there are no hydrologically connected designated sites within the Study Area or within 1km downstream of the Study Area. However, given that groundwater has potential to be impacted and the ground of the proposed development is predominantly peat and will be impacted, for example, through siting of infrastructure, the Inspectorate considers that there is still potential for a hydrological impact pathway to designated sites. In the absence of information such as evidence demonstrating clear agreement with relevant statutory bodies, the Inspectorate is not in a position to agree to scope these matters from the assessment. Accordingly the ES should include an assessment of these matters or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a LSE.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
35.3	Table 9-6	Decommissioning effects	The Scoping Report states that decommissioning the proposed development will be carried out in accordance with an approved decommissioning plan which will be expected to include the same safeguards as those provided during the construction phase of the proposed development. The Inspectorate notes that despite safeguards being in place during construction, LSE are scoped in during construction. Therefore, the Inspectorate does not agree that this matter can be scoped out; the ES should assess any LSE from decommissioning.

ID	Ref	Description	Inspectorate's comments
35.4	Paragraphs 9.3.19 and 9.8.3	Flood zones 3a and 3b	Figure 9-2 shows flood zone mapping for the study area where flood zones 3a and 3b are not distinguished. The ES should include a figure which distinguishes between flood zones 3a and 3b to determine which parts of the site are in areas of 'high probability of flooding' and 'functional floodplain' to inform the approach to the assessment of flood risk and approach to mitigation in the ES and the Flood Risk Assessment (FRA).
35.5	Paragraphs 3.15.5 and 9.4.14 to 9.4.16	Flood Risk Assessment – climate change allowances	Scoping Report paragraph 3.15.5 refers to accounting for climate change projections in the FRA. The proposed approach to the future baseline is set out in Scoping Report paragraphs 9.4.14 to 9.4.16 but does not refer to the inclusion of climate change projections. The FRA and ES assessment should apply the latest climate change allowances (currently UKCP18) and assess any LSE to/from flooding with climate change projections. The applicant should seek agreement on the approach with the relevant consultation bodies.

ID	Ref	Description	Inspectorate's comments
356	Paragraph 2.6.16 and Table 9-5	Impacts from disturbance of peat	Peat is not included in the description of the potential impacts scoped into the assessment in Scoping Report Table 9-5. Disturbance of peat has potential to reduce water storage and impact flood risk and water quality. Scoping Report paragraph 2.6.16 identifies that impacts to peat are likely to occur and a Peat Management Plan is proposed to minimise potential impacts. The ES should identify the total permanent and temporary habitat loss and / or degradation arising from the proposed development and associated activities and assess any impacts from changes in hydrology in terms of quantity, flow and quality. Appropriate cross reference should be made between relevant chapters eg the Geology, Soils and Ground Conditions Chapter. Please also see ID 2.1.4 of this Scoping Opinion.
357	Paragraphs 2.5.20 to 2.5.25	Construction/alteration of the road network	The Inspectorate notes that the Scoping Report proposes modifications to the existing road network in paragraphs 2.5.20 to 2.5.25, including construction of accesses and haul roads. However, it is not clear if subsequent impacts from the alteration of drainage and flows are captured in the matters proposed to be scoped into assessment in Scoping Report Table 9-5. For clarity, the ES should describe the associated proposed drainage mitigation and explain how it is secured and assess any associated LSE.
358	Paragraph 2.5.42	Water supply	Scoping Report paragraph 2.5.42 identifies that water supply would be required should concrete batching be undertaken on site. However, it is not clear if these impacts are captured in the matters proposed to be scoped into assessment in Scoping Report Table 9-5. For clarity, the ES should establish whether water supply is required for the proposed development and if so, assess any associated LSE and describe any associated mitigation measures and explain how they are secured.

ID	Ref	Description	Inspectorate's comments
35.9	Paragraph 9.2.2	Study area	500m from the Scoping boundary has been applied to define the study area based on professional judgement. However, Scoping Report paragraph 9.2.3 identifies that there is potential for impacts to extend beyond this distance up to 2km based on a number of variables. The ES should justify and explain an appropriate study area and seek agreement from the relevant consultation bodies on the approach.
35.10	n/a	Impacts from heat	Scoping Report paragraph 2.5.1 states that on-site underground cables will form part of the proposed development. There is no indication from the Scoping Report whether it is possible that the underground cables could raise the temperature of groundwater or whether it could impact peat. The ES should confirm if there is a potential impact pathways from heat from underground cables and assess any associated LSE. The applicant should seek to agree any approach with the relevant consultation bodies.
35.11	Paragraphs 9.3.15 and 9.3.33 to 9.3.35	Water Framework Directive (WFD) Groundwater bodies	Scoping Report paragraph 9.3.15 identifies WFD river water bodies however, WFD groundwater receptors are not identified in paragraphs 9.3.33 to 9.3.35 where the hydrogeology baseline is described. The ES should identify and describe the baseline in relation to WFD groundwater bodies and assess any LSE from the proposed development.
35.12	n/a	Flood risk in catchments of less than 3km ²	Scoping Report paragraph 9.3.20 identifies that there are only small areas located within flood risk zones 2 and 3 based on the 'Flood Map for Planning'. However, this does not account for watercourses with catchment areas less than 3km². The Inspectorate notes a number of watercourses within the proposed development area as identified in paragraph 9.3.12 to 9.3.17 with catchments potentially smaller than 3km². The applicant's attention is drawn to the Environment Agency's consultation response in the appendix to this Scoping Opinion.

ID	Ref	Description	Inspectorate's comments
			The ES should set out a methodology for assessing the flood risk of any such catchments where significant effects are likely to occur and provide an assessment of LSE.
35.13	Paragraph 10.4.9	Borrow pits	Please see ID 3.6.9 of this Scoping Opinion for detail on this matter.

3.6 Geology, Soils and Ground Conditions

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
36.1	Table 10-4	Ground disturbance activities – operation and maintenance	The Inspectorate is content to scope this matter out, on the basis the ES confirms that any ground disturbing activities will be limited during operation and maintenance and that any activities would be undertaken in line with the Operational Phase Environmental Management Plan (OPEMP).
36.2	Table 10-4	Decommissioning effects	The Inspectorate notes that the applicant has committed to a decommissioning plan which is to include the same safeguards as for the construction phase and that decommissioning effects are anticipated to be similar to those during construction. However, construction effects are scoped in for further assessment. On this basis, the Inspectorate does not agree to scope this matter out; the ES should either provide evidence to justify scoping out effects during decommissioning or provide an assessment of LSE.
36.3	Table 10-4	Cumulative effects assessment of ground instability, disturbance and loss of carbon rich soils and peat deposits and contaminated land – all phases	The Scoping Report notes that the potential for significant effects for these matters is anticipated to only be likely during construction and only when the proposed development and other projects overlap in both spatial footprint and timelines. Noting this, and the location of the proposed developments to be included in the cumulative assessment (Scoping Report Figure 3.1), the Inspectorate agrees that these matters can be scoped out on the basis the ES confirms that no cumulative developments have come forward that would overlap in spatial footprints and timelines prior to the submission of the ES.

ID	Ref	Description	Inspectorate's comments
364	Paragraph 2.5.14	Hardstanding and other ground installations	The Scoping Report state that " <i>The crane pad area would be left in situ following wind turbine installation, to allow for servicing and maintenance activities, including the replacement of components if required during the operational lifetime of the Project, and to facilitate decommissioning.</i> " The Scoping Report does not explain if these hardstandings are to remain post-decommissioning. This should be determined and set out in the project description and considered in all relevant assessments.
365	Section 10.2	Study area	On the basis that foundation and excavation depths and locations are currently unknown, it is not clear whether impacts could occur outside of the proposed development red line boundary which is proposed as the study area. The ES should explain the locations and depths of any ground works and use this to inform an appropriate study area. The applicant should seek agreement with the relevant consultation bodies.
366	Paragraph 11.5.2	Haul roads	The Traffic and Transport Chapter sets out that haul roads are being considered; the impact of these on geology and soils should be assessed where there is a potential for significant effects.
367	Paragraph 10.3.9	Peat present on site	The applicant is encouraged to seek agreement with Natural England on the scope of surveys and peat baseline informing the assessment.
368	n/a	Erosion impacts	It is not evident from the Scoping Report that erosion impacts specifically will be assessed. The ES should assess impacts to/from erosion where significant effects are likely to occur and appropriate cross reference should be made between chapters where relevant eg the Hydrology and Hydrogeology Chapter.
369	Paragraph 10.4.9	Borrow pits	The Scoping Report notes that a borrow pit appraisal will be undertaken. The Scoping Report does not set out how the impact of borrow pits, if used, will be assessed. The ES should set out any potential likely significant effects from the use of borrow pits on both geology and soils and hydrology.

ID	Ref	Description	Inspectorate's comments
36.10	10.3.16	Best and Most Versatile land (BMV)	Scoping Report paragraph 2.2.7 states that a small portion of the site would overlap with grade 3 agricultural land. The ES should clarify whether this is grade 3a or 3b and whether it is BMV and the extent of the BMV land affected. The ES should explain whether any works are proposed on this land and assess any potentially associated LSE.

3.7 Access, Traffic and Transport

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
37.1	Table 11-7	Additional vehicle movements – operation and maintenance	The Scoping Report states that vehicle movements associated with the operation stage are minimal, noting the need for the occasional maintenance and inspection vehicles. The Inspectorate is content to scope this matter out on the basis the ES confirms and explains how the number of operational movements align with this description, accounting for those associated with the replacement of components as discussed in Scoping Report paragraph 2.5.14 and replacement of buried cables as noted in Scoping Report Table 6-6.

ID	Ref	Description	Inspectorate's comments
37.2	Table 11-6	Right to Roam	The Scoping Report scopes in Public Rights of Way (PRoWs) that cross the site. A number of consultation responses note that the proposed turbine area is Right to Roam land and therefore the ES should consider the impact on this area in relation to these rights. This should also be considered in relation to socio-economic impacts.

3.8 Noise and Vibration

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
38.1	Table 12-3	Road traffic noise – operation and maintenance	The Scoping Report states that vehicle movements associated with the operation stage are minimal, noting the need for the occasional maintenance and inspection vehicles. The Inspectorate is content to scope this matter out on the basis the ES confirms and explains how the number of operational movements align with this description, accounting for those associated with the replacement of components as discussed in Scoping Report paragraph 2.5.14 and replacement of buried cables as noted in Scoping Report Table 6-6.
38.2	Table 12-3	Vibration – operation and maintenance	The Scoping Report states that no significant sources of vibration will be present during operation although limited information is provided. The Inspectorate agrees that this matter can be scoped out on the basis the ES clarifies the sources and distance at which vibration could be experienced and demonstrates there would be no pathway for effect to sensitive receptors.
38.3	Table 12-3	Infrasound, low-frequency noise, tonal noise and excess amplitude modulation – operation and maintenance	The Scoping Report proposed to scope out this matter based on guidance set out in ETSU-R-97 stating that this matter would be outside of the scope required for the planning stage of onshore wind turbine developments. The Inspectorate understands that this guidance (and subsequent updated guidance) relates to turbines only. The ES should confirm that aside from the turbines, no other component of the proposed development would give rise to these types of noise conditions. On this basis, the Inspectorate agrees to scope this matter out.
38.4	Table 12-3	Noise and vibration – decommissioning	The Scoping Report proposes to scope this matter out on the basis that the scale of decommissioning works would be less than that during construction and therefore there

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			would be not potential for LSE. Scoping Report Table 12-3 states that noise effects during decommissioning cannot be projected given future uncertainty. Potential LSE are scoped in for noise and vibration impacts during construction in Scoping Report Table 12-2. It is not clear whether the reduced scale of decommissioning would be sufficient to avoid significant effects in this regard. The Inspectorate considers that it is possible to undertake an assessment setting out relevant assumptions and limitations in the ES and using current baseline conditions and proposed decommissioning activities as a worst case scenario. Please see ID 3.14.12 of this Scoping Opinion for further detail related to impacts to human health. The Inspectorate does not agree to scope this matter out. The ES should assess LSE from decommissioning noise and vibration impacts during decommissioning.

ID	Ref	Description	Inspectorate's comments
385	Paragraph 12.4.2	Updated guidance	Since the issuing of this Scoping Report, an updated Assessment and Rating of Wind Turbine Noise (2026) has been published, replacing ETSU-R-97. The applicant is encouraged to review their approach to assessment in light of this new guidance and to agree the approach with the relevant statutory consultation bodies.

3.9 Aviation, Radar and Telecommunications

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.9.1	Table 13-3	Receptors not present in the study area – all phases	Table 13-3 sets out a number of receptors that are not present in the study area. Noting that the study area has been determined based on UK Civil Aviation Authority (CAA) guidance CAA Policy and Guidelines on Wind Turbines (CAP 764) and set out in Scoping report section 13.2, the Inspectorate is content with this approach and agrees to scope these receptors out of the ES.

3.10 Shadow Flicker

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	Table 14-3	Shadow flicker assessment – construction and decommissioning	The Inspectorate is content that shadow flicker effects are only possible when a turbine is in operation and therefore effects during construction and decommissioning can be scoped out of the assessment.
3.10.2	Table 14-3	Receptors beyond 10 times the rotor blade diameter – all phases	The Inspectorate acknowledges that industry standards note that effects beyond a distance of 10 times the rotor blade length are unlikely. However, in the absence of final turbine location and size information, the Inspectorate suggests the applicant seek to agree the study area radius with relevant consultation bodies, to enable further consideration of topography and final design. On this basis the Inspectorate does not agree to scope out any receptors beyond this distance out at this stage.
3.10.3	Table 14-3	Shadow flicker effects on people with epilepsy – all phases	The Scoping Report sets out that wind turbines likely to be constructed for the proposed development are considered to rotate slower than the frequency considered to trigger photosensitive epilepsy. Noting the information provided, the Inspectorate is content to scope this matter out.
3.10.4	Table 14- 3	Shadow flicker assessment – cumulative effects	The Inspectorate notes that there are currently no existing, consented or in planning windfarms in the vicinity of the proposed development which could contribute to shadow flicker impacts, and therefore cumulative effects can be scoped out at this stage. This should however be reviewed should this change prior to the submission of the ES.

3.11 Air Quality

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.11.1	Table 15-8	Plant and machinery (Non-Road Mobile Machinery (NRMM)) air quality effects – construction	The Scoping Report proposes to scope out an assessment of emissions from NRMM during the construction phase on the basis that the amount of NRMM to be used is relatively small (fewer than 10 units operating simultaneously at any location), and the site layout would be designed to maximise the distance between NRMM and sensitive receptors. On the basis the ES confirms the number, operation and layout of NRMM to be used on site during construction in line with the above and demonstrates that this is secured, the Inspectorate agrees that this matter can be scoped out.
3.11.2	Table 15-8	Wind turbine effects – operation and maintenance	The Inspectorate is content that the operation of wind turbine and associated infrastructure is unlikely to result in significant effects on air quality and that this matter can be scoped out of further assessment.
3.11.3	Table 15-8	Effects on human health of vehicle trips increasing emissions of NO₂ and particulate matter – operation and maintenance And Effects on local designated conservation sites	On the basis of the information in the Access, Traffic and Transport Chapter 11, with regard to low traffic flows during operation, subject to confirmation on the number and type of traffic movements during operation in the ES, the Inspectorate agrees that operational traffic emissions can be scoped out.

		due to changes in nitrogen oxides (NOx), ammonia (NH3) and nitrogen / acid deposition due to emissions from road vehicle movements on the local road network – operation and maintenance	
3.114	Table 15-8	Effects of dust on human health and ecological sites local to the proposed development – decommissioning	The Scoping Report proposes to scope this matter out on the basis that the scale of decommissioning works would be less than that during construction and therefore there would be not potential for LSE. Potential LSE are scoped in for construction effects in Scoping Report Table 15-7. It is not clear whether the reduced scale of decommissioning would be sufficient to avoid significant effects in this regard. The Inspectorate does not agree to scope this matter out. The ES should assess any LSE from dust on human and ecological receptors during decommissioning.
3.115	Table 15-8	Impacts from delivery vehicles, plant and machinery (NRMM) to all receptors – decommissioning	The Scoping Report proposes to scope out an assessment of emissions from NRMM during decommissioning on the basis that emissions from vehicle, plant and machinery are expected to be much lower due to improvements in vehicle technology and progression towards net zero carbon emissions. No information has been provided in the Scoping Report to support this. However, the Inspectorate is content to scope this matter out on the basis that sufficient information is provided to demonstrate no likely significant effects and the site management controls, and mitigation are secured using a similar approach to that adopted during the construction phase.
3.116	Table 15-8	Cumulative effects	The Scoping Report states that there are no other developments anticipated to give rise to significant cumulative effects on air quality cumulatively with the proposed development. It refers to the identified cumulative developments in Table 3-2. However, as per ID 2.2.5 of this Scoping Opinion, the Inspectorate considers that not all cumulative

			developments have been captured and also, other developments may come forward before submission of the ES. On this basis, the Inspectorate does not agree to scope this matter out and the ES should identify and assess any cumulative LSE to air quality where impacts from the proposed development may combined with other schemes.

ID	Ref	Description	Inspectorate's comments
3.11.7	Paragraph 15.2.12	Ecological receptors – all phases	The Scoping Report does not identify proposed access routes and it is uncertain whether routes would pass within 200m of ecologically designated sites. The applicant's attention is drawn to the consultation response from Natural England appended to this Scoping Opinion in relation to this matter. The ES should determine whether potential impact pathways exist based on the final design of the proposed development in line with relevant guidance. Where an impact pathway exists, the ES should assess any significant effects where they are likely to occur and the applicant should seek agreement on the approach with the relevant consultation bodies.

3.12 Carbon and Climate Change

(Scoping Report Section 16)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.121	Table 16-4	Cloud cover / sunshine frequency	The Inspectorate agrees that impacts from cloud cover and/or sunshine are unlikely to lead to significant effects to the operation of the proposed development and can be scoped out of the ES.
3.122	Table 16-4	Minimum air temperature / frost frequency	The Inspectorate agrees that effects from minimum air temperatures and / or frost frequency during construction, operation and decommissioning of the proposed development are unlikely to lead to significant effects. The Scoping Report states that the proposed development would be built with consideration of current cold climate conditions in mind. The ES should explain how the design of the proposed development has embedded measures to operate in cold conditions.
3.123	Table 16-4	Coastal flooding and erosion	The Inspectorate agrees that on the basis the proposed development would be located inland, there would be no potential for LSE from coastal flooding and erosion and that this matter can be scoped out of the ES.
3.124	Table 16-4 and Chapter 9	Fluvial and pluvial flooding	The Inspectorate is content that this can be scoped out of the Carbon and Climate Change Chapter on the basis that effects from fluvial and pluvial flooding, taking account of climate change projections, would be assessed in the Hydrology and Hydrogeology Chapter of the ES. However, it is not evident from Tables 9-3 or 9-5 of the Hydrology Chapter of the Scoping Report as to whether impacts to the proposed development from changes in flood risk are considered. The ES should assess impacts to the proposed development from changes in flood risk during all phases using appropriate climate change projections.

3.125	Table 16-2	Impacts to peat resources	Table 16-2 of the Scoping Report identifies the matters proposed to be scoped in, however, impacts from peat disturbance influencing GHG emissions are not included and it is unclear whether this would be captured under proposed assessment of 'land use'. The ES should assess potential impacts to peat including the reduction of carbon storage and sequestration and subsequent release of GHG emissions during all phases where significant effects are likely to occur. This should take account of cumulative and long-term effects. Appropriate cross reference should be made to the Geology, Soils and Ground Conditions Chapter where this informs the carbon and climate change assessment.
3.126	Table 16-2	Land use – decommissioning	Impacts from changes in land use are not proposed to be assessed during decommissioning but no explanation is provided and it is not proposed to be scoped out in Table 16-4. The ES should determine the scope of assessment, seeking agreement from the relevant consultation bodies, and provide an assessment of LSE to land use during the decommissioning stage or else justify why this matter should be scoped out.

ID	Ref	Description	Inspectorate's comments
3.127	Table 16-1, Paragraph 16.4.1	Carbon Impacts	The Scoping Report uses Carbon and GHG emissions interchangeably, although it proposes to assess LSE from the emissions of GHGs. However, the list of GHGs being assessed is not provided. The ES should be explicit in the emissions being assessed in the climate change chapter so that the ES is transparent.
3.128	n/a	Carbon budgets	There is no mention of the comparison of the proposed development emissions against carbon budgets in the Scoping Report. The ES should explain how the GHG emissions and savings of the proposed development align with relevant carbon budgets to inform the assessment of LSE in line with the relevant guidance.
3.129	Paragraph 16.3.5	Baseline conditions	Whilst the Scoping Report identifies how the baseline environment would be determined for the Climate Change Chapter, the baseline is not described in the Scoping Report.

			The ES should define the baseline conditions in line with relevant guidance.
3.12.10	Paragraph 2.5.42	Batching concrete on site	It is not stated whether it is assumed that this operation would occur although it is proposed as an option in Scoping Report paragraph 2.5.42. The ES should assess the LSE of GHG emissions from concrete batching using the worst case scenario where concrete batching is proposed.

3.13 Socio-Economics

(Scoping Report Section 17)

ID	Ref	Applicant's proposed aspects to scope out	Inspectorate's comments
3.13.1	Paragraph 17.1.3	Socio-economic effects	The Scoping Report proposes to scope out this matter on the basis that a standalone socio-economics and tourism report will be provided separately alongside the ES. While the Inspectorate agrees that impacts regarding local population, employment structure, businesses, or community infrastructure are unlikely to give rise to significant effects, insufficient information has been provided to demonstrate that significant effects can be ruled out in relation to tourism. Given that paragraph 17.3.17 of the Scoping Report identifies tourism as a significant contributor to the regional economy and considering the proximity of the Yorkshire Dales National Park and the North Pennines National Landscape to the site, the Inspectorate does not agree to scope out impacts to tourism. The ES should assess potential tourism effects arising from the proposed development during construction, operation and decommissioning where relevant, including effects on the tourist economy and broader tourism-related effects, such as those arising from changes to the landscape. Appropriate cross reference should be made to the Landscape and Visual Chapter.

ID	Ref	Description	Inspectorate's comments
3.132	Paragraph 17.2.5	Study area – tourism assets	The Scoping Report sets out a 15km study area for considering significant environmental effects upon tourism assets. The ES should identify an appropriate study area supported by evidence and seek agreement with the relevant consultation bodies.

3.14 Other Environmental Topics

(Scoping Report Section 18)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.14.1	Section 18.2	Material assets – all phases	The Inspectorate agrees that this matter can be scoped out on the basis that effects will be assessed in the Carbon and Climate Change Chapter of the ES. The transportation of materials should be assessed in the Traffic and Transport Chapter of the ES. The ES should quantify the number and type of materials required and confirm how they would be transported to site or produced on site and explain how they have been sourced.
3.14.2	Section 18.2	Waste – construction	The Scoping Report states that initial calculations of the construction waste would be 287,900m³. This is compared to the current existing landfill capacity in the study area of 72 million cubic meters of which 20.8million cubic meters is for inert waste. Additionally, the Scoping Report commits to develop a CEMP, a Materials Management Plan and a Site Waste Management Plan prior to commencement of the construction works to manage the handling of waste. Waste would also be dealt with by a licenced waste management facility. On the basis the ES confirms the amount and type of anticipated waste materially reflects those anticipated in the Scoping Report and secures the appropriate measures to manage waste in line with relevant guidance, the Inspectorate agrees that this matter can be scoped out.
3.14.3	Section 18.2	Waste – operation	The Scoping Report proposes that operational waste would be managed off-site in line with either standard operation procedures or an operational waste management plan. This would include the list of wastes likely to be generated during operation. It is not clear from the Scoping Report what the anticipated sources or quantities of waste would be during operation; the ES should set out anticipated waste sources and quantities

			during operation as well as providing detail on how they would be managed and how this is secured. On this basis, the Inspectorate agrees that this matter can be scoped out.
3.144	Section 18.2	Waste – decommissioning	The Scoping Report acknowledges that quantities and types of waste at decommissioning and potential recycling technologies are not currently understood. It proposes to produce a decommissioning plan toward the end of the proposed development's operational life to set out the requirements and methods for decommissioning providing a description of the components to be decommissioned and decommissioning measures alongside anticipated recycling and recovery targets. Whilst the Inspectorate agrees that this information should be included in a decommissioning plan committed to through the ES, the Inspectorate considers that it is possible to undertake an assessment setting out relevant assumptions and limitations in relation to a worst case scenario of quantities and types of waste based on the proposed infrastructure and decommissioning activities. On this basis, the Inspectorate does not agree to scope this matter out. The ES should provide an assessment of potential LSE at decommissioning from waste and set out anticipated waste types, quantities and how the waste hierarchy would be applied.
3.145	Section 18.2	Waste and material assets – cumulative	The Scoping Report state that the proposed development would not generate waste volumes or material demands of a scale that could meaningfully interact with other development to lead to LSE. The Inspectorate considers that due to the lack of information around waste generated during decommissioning, and detail on the materials to be brought to/ produced on site alongside the anticipated waste during construction, it cannot be confirmed there is no potential for LSE. Additionally, there remains uncertainty regarding other developments that may be proposed within the study area in the future. On this basis, the Inspectorate does not agree to scope out cumulative effects from waste. The ES should include an assessment of these matters or demonstrate the absence of a LSE and any relevant agreement with consultation bodies.
3.146	Section 18.3	Human health – Electro Magnetic	The Scoping Report proposes that the proposed development would 'comply' where reasonably practicable to the exposure standard set out in the Department for Energy and

		Fields (EMFs) during operation	Climate Change (DECC) Voluntary Code of Practice. The voltage of the cables and burial depths are not set out in the Scoping Report. On this basis, the Inspectorate is not in a position to agree to scope this matter from the assessment. Accordingly, the ES should include an assessment of this matter or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effect.
3.14.7	Section 18.3	Human health – impacts from EMFs, air quality, noise and vibration, levels of physical activity and enjoyment of the outdoors, loss of community identity, employment opportunities, access to community services and facilities, demand on local services and crime and community safety during construction	The Inspectorate agrees with the approach to assess impacts to human receptors in the respective air quality, noise and vibration, traffic and transport, landscape and visual, socio-economics chapters and that these matters can be scoped out of a separate human health chapter.
3.14.8	Section 18.3	Human health – crime and community safety during construction	The Scoping Report sets out that the site would be managed and operated in accordance with the Health and Safety at Work Act 1974 and comply with relevant Health and Safety Regulations. The ES should secure such health and safety protocols through the relevant management plans. On the basis such mitigation measures are secured, the Inspectorate is content that significant effects are unlikely and that this matter can be scoped out.

3.14.9	Section 18.3	Human health - Perceived fear and anxiety of EMFs and increased mental health burden during operation	The Inspectorate agrees that significant effects are not likely to occur and that this matter can be scoped out of the ES.
3.14.10	Section 18.3	Human health - Annoyance and perceived fear from operational noise and shadow flicker, reduced levels of physical activity and enjoyment of the outdoors during operation	The Inspectorate agrees with the approach to assess impacts to human receptors in the respective shadow flicker, noise and vibration, traffic and transport and landscape and visual chapters and that these matters can be scoped out of a separate human health chapter
3.14.11	Section 18.3	Human health – impacts from air quality during decommissioning	The Inspectorate does not agree to scope this matter out. Please see ID 3.11.6 of this Scoping Opinion for further detail. The Inspectorate considers that this matter can be scoped into the air quality assessment and on this basis, a separate human health chapter would not be required.
3.14.12	Section 18.3	Human health – impacts from noise and vibration during decommissioning	The Inspectorate does not agree to scope this matter out. Please see ID 3.8.4 of this Scoping Opinion for further detail. However, the Inspectorate considers that this matter can be scoped into the noise and vibration assessment and on this basis, a separate human health chapter would not be required.
3.14.13	Section 18.3	Human health – impacts on reduced levels of physical	The Inspectorate agrees with the approach to assess impacts to human receptors in the respective traffic and transport and landscape and visual chapters and that these matters can be scoped out of a separate human health chapter

		activity and enjoyment of the outdoors and reduced access to, and increased demand on community services and facilities during decommissioning	
3.14.14	Section 18.3	Human health – impacts causing loss of social cohesion during construction and decommissioning	The Inspectorate agrees that the proposed development is unlikely to cause significant effects. On the basis the ES confirms that it would not directly affect land used for community interaction or promote community participation, the Inspectorate agrees that this matter can be scoped out of the ES.
3.14.15	Section 18.3	Human health – cumulative effects on reduced access to, and increased demand on community services and facilities and increased employment opportunities during all phases	The Inspectorate agrees with the approach to assess impacts to human receptors in the respective traffic and transport and socio-economic chapters and that these matters can be scoped out of a separate human health chapter
3.14.16	Section 18.4	Major accidents and disasters – extreme weather	On the basis the design measures set out in Table 18-3 are described in the ES and secured as part of the project description, the Inspectorate agrees that this matter can be scoped out of the ES.

3.14.17	Section 18.4	Major accidents and disasters – collision risk with road users	On the basis the ES confirms that the mitigation measures set out in Table 18-3 are described and secured, the Inspectorate agrees that this matter can be scoped out of the ES.
3.14.18	Section 18.4	Major accidents and disasters – utility strikes	The ES should describe how micro-siting has been informed by avoidance of interaction with utilities. Any evidence of agreement on interactions and mitigation where avoidance is not possible should be provided in the ES. On this basis the Inspectorate agrees that this matter can be scoped out.
3.14.19	Section 18.4	Major accidents and disasters – UXO	The Scoping Report proposes to undertake a detailed assessment of UXO risk to inform micro-siting and designs and identify areas of sensitivity and mitigate any risk of UXO during surveys and construction. Any risks and mitigation would be identified and secured through the CEMP. It is acknowledged that the proposed development site is a low risk of UXO presence. On the basis the ES confirms and secures a pre-construction detailed assessment of UXO risk and describes and secures associated mitigation measures in line with those set out in the Scoping Report, the Inspectorate agrees that this matter can be scoped out of the ES.
3.14.20	Section 18.4	Major accidents and disasters – mining, subsidence / unstable ground	The Scoping Report identifies that there is evidence of former underground coal and metal mining at the proposed development site. Additionally the Scoping Report states that records identify extensive areas of the site are underlain by limestone which is prone to the formation of sink holes. A detailed mining risk assessment and a Geo-Hazards Risk Assessment are proposed to inform design and micro-siting and identify avoidance and mitigation measures in order to avoid potential LSE. The Inspectorate notes that instability related to mining and ground instability is scoped in for assessment in Table 10-3 for the Geology, Soils and Ground Conditions Chapter which is contradictory to the reasoning provided in Table 18-13. On this basis, the Inspectorate does not agree to scope these matters out. However, the Inspectorate considers that impacts from major accidents and disasters from mining and

			ground instability can be addressed in the Geology, Soils and Ground Conditions Chapter and a separate major accidents and disasters chapter is not required.
3.14.21	Section 18.4	Major accidents and disasters – peat landslide	A Peat Landslide Hazard Risk Assessment (PLHRA) is proposed to be undertaken to determine whether the Project could reasonably increase the likelihood or consequences of a peat landslide event occurring and identify areas susceptible to instability. This would then inform the design of the proposed development and any required mitigation measures to manage the risk. The Inspectorate considers that there is not enough evidence at this time to scope this matter out given the Scoping Report identifies extensive peatland across the site. Additionally, impacts from peat instability are proposed to be scoped into the Geology, Soils and Ground Conditions Chapter. On this basis, the Inspectorate does not agree to scope these matters out. However, the Inspectorate considers that impacts from major accidents and disasters from peat instability can be addressed in the Geology, Soils and Ground Conditions Chapter and a separate major accidents and disasters chapter is not required.
3.14.22	Section 18.4	Major accidents and disasters – flooding	The Scoping Report identifies potential impacts from flooding and states that the FRA would explain how flooding would be managed across the site. The Inspectorate notes that impacts from flooding are scoped into the Hydrology and Flood Risk Chapter. Considering the lack of evidence supporting that there would not be a LSE from flooding, the Inspectorate does not agree to scope these matters out. However, the Inspectorate considers that impacts from major accidents and disasters from flood risk can be addressed in the Hydrology and Flood Risk Chapter and a separate major accidents and disasters chapter is not required.
3.14.23	Section 18.4	Major accidents and disasters – release of chemicals	The Scoping Report proposes standard pollution prevention and spill-response measures, including environmental incident response procedures and management and storage of chemicals will be employed and set out in the CEMP and Decommissioning Plan. It is not clear from the Scoping Report whether this would be applicable to the operation of the proposed development also.

			The Inspectorate considers that such measures should also be secured during the operational period. On the basis the ES confirms such measures are secured for all relevant phases of the proposed development, the Inspectorate agrees that this matter can be scoped out of the ES.
3.1424	Section 18.4	Major accidents and disasters – fire	The Scoping Report proposes that potential ignition sources during construction and decommissioning would be managed through measures set out within the CEMP, including bunded storage, plant maintenance and provision of firefighting equipment. The Inspectorate considers that such measures should also be set out in the Decommissioning Plan of the ES to address ignition sources during decommissioning. During operation, the Scoping Report proposes fire suppression systems and monitoring to mitigate potential fire incidents and a fire risk assessment would inform the detailed design of the proposed development. Noting the comments from North Yorkshire Fire and Rescue Services as appended to this Scoping Opinion, the ES should demonstrate that fire mitigation measures account for the heightened intensity and potential for secondary fires associated with peat and fires at height, and that access in the event of an emergency is appropriate and secured, including access at height. It should also explain how the proposed mitigation minimises potential impacts to the water environment and provide appropriate cross reference to the Hydrology and Hydrogeological Chapter where relevant. The applicant should seek agreement with the relevant consultation bodies on the proposed measures. On the basis the ES provides adequate mitigation measures and explains how these are secured, the Inspectorate agrees that this matter can be scoped out of further assessment.
3.1425	Section 18.4	Major accidents and disasters – construction and decommissioning activities and operational activities including wind turbine collapse	The Inspectorate agrees that on the basis the ES confirms and secures that the proposed development would be constructed in accordance with the relevant British standards and health and safety regulations and applies relevant guidance as set out in Scoping Report Table 18-13, no significant effects are likely to occur and this matter can be scoped out of the ES.

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES

Bodies prescribed in schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended) (the 'APFP Regulations (as amended)')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Secretary of State for Defence	Ministry of Defence
The relevant parish council or, where the application relates to land in Wales or Scotland, the relevant community council	Arkengarthdale Parish Council
	Marske and New Forest Parish Council
	Newsham Parish Council
	Marrick Parish Council
	Dalton Parish Council
	Rokeby, Brignall and Egglestone Abbey Parish Council
The Environment Agency	The Environment Agency
Natural England	Natural England
The Forestry Commission	Forestry Commission -Yorkshire & North East
Relevant AONB Conservation Boards	Potential Future Boards - North Pennines National Landscape
The Historic Buildings and Monuments Commission for England (known as Historic England)	Historic England
The relevant Highways Authority	North Yorkshire Council
	Durham County Council
	National Highways

SCHEDULE 1 DESCRIPTION	ORGANISATION
Integrated Transport Authorities (ITAs) and Passenger Transport Executives (PTEs)	Tyne and Wear Passenger Transport Executive (Nexus)
The Health and Safety Executive	Health and Safety Executive
NHS England	NHS England
The Coal Authority	Mining Remediation Authority
The Crown Estate Commissioners	The Crown Estate
The relevant police authority	Durham Police and Crime Commissioner
	York and North Yorkshire Combined Authority - Policing, Fire and Crime Team
The relevant ambulance service	Yorkshire Ambulance Service - NHS Trust
	North East Ambulance Service - NHS Foundation Trust
The relevant fire and rescue authority	County Durham and Darlington Fire and Rescue Service
	North Yorkshire Fire and Rescue Service

TABLE A2: RELEVANT STATUTORY UNDERTAKERS

‘Statutory undertaker’ is defined in The APFP Regulations (as amended) as having the same meaning as in section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Integrated Care Board	NHS North East and North Cumbria Integrated Care Board
	NHS Humber and North Yorkshire Integrated Care Board
NHS England	NHS England
Railways	National Highways Historical Railways Estate
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding

STATUTORY UNDERTAKER	ORGANISATION
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant water and sewage undertaker	Yorkshire Water
The relevant public gas transporter	Cadent Gas Limited
	Northern Gas Networks Limited
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
	CNG Services Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	Fulcrum Pipelines Limited
	GTC Pipelines Limited
	Harlaxton Gas Networks Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Inovyn Enterprises Ltd
	Last Mile Gas Ltd
	Leep Gas Networks Limited
	Mua Gas Limited
	Quadrant Pipelines Limited
	Stark Infra-Gas Limited
	National Gas
The relevant electricity distributor with CPO Powers	Northern Powergrid (Northeast) Limited
	Northern Powergrid (Yorkshire) plc

STATUTORY UNDERTAKER	ORGANISATION
	Advanced Electricity Networks Ltd
	Aidien Ltd
	Aurora Utilities Ltd
	Eclipse Power Network Limited
	Energy Assets Networks Limited
	AGR Networks Ltd
	Edge Utility Networks Ltd
	Eclipse Power Distribution Limited
	Grid Line Power Networks
	Sphere Energy Connect Ltd
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Green Generation Energy Networks Cymru Ltd
	Harlaxton Energy Networks Limited
	Independent Distribution Connection Specialists Ltd
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited
	Mua Electricity Limited
	Optimal Power Networks Limited
	Stark Infra-Electricity Ltd
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited

STATUTORY UNDERTAKER		ORGANISATION
		Vattenfall Networks Limited
The relevant electricity transmitter with CPO Powers		National Grid Electricity Transmission Plc
		National Energy System Operator (NESO)

TABLE A3: LOCAL AUTHORITIES AS DEFINED IN SECTION 43(3) OF THE PA2008

LOCAL AUTHORITY
Pendle Borough Council
Ribble Valley Borough Council
Lancaster City Council
Yorkshire Dales National Park Authority
North York Moors National Park Authority
City of Doncaster Council
City of York Council
Northumberland County Council
Gateshead Metropolitan Borough Council
East Riding of Yorkshire Council
Hartlepool Borough Council
Durham County Council
North Yorkshire Council
Westmorland and Furness Council
Leeds City Council
Sunderland City Council
Wakefield Metropolitan District Council
Bradford Metropolitan District Council
Darlington Borough Council

LOCAL AUTHORITY
Middlesbrough Borough Council
Redcar and Cleveland Borough Council
Stockton-on-Tees Borough Council
Lancashire County Council

TABLE A4:: NON-PRESCRIBED CONSULTATION BODIES

ORGANISATION
York and North Yorkshire Combined Authority
North East Combined Authority
Potential future Development Corporations

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Advanced Electricity Networks Ltd.
Arkengarthdale Parish Council
City of Bradford Metropolitan District Council
Coal Authority
Darlington Borough Council
Durham County Council
Environment Agency
Forestry Commission
Gateshead Metropolitan Borough Council
Hartlepool Borough Council
Health and Safety Executive
Historic England
Marske and New Forest Parish Council
Middlesborough Borough Council
Ministry of Defence
National Grid
National Highways
NATS
Natural England
Newsham Parish Council
North Yorkshire Council
North Yorkshire Fire and Rescue Service

Northumberland County Council
Sphere Energy Connect
Sunderland City Council
Yorkshire Dales National Park Authority

From: [REDACTED]@advancedelectricitynetworks.co.uk>
Sent: 25 June 2026 10:49
To: Hope Moor Wind Farm <HopeMoorWindFarm@planninginspectorate.gov.uk>;
BeforeYouDig@northerngas.co.uk
Subject: RE: EXT:EN0110038 - Hope Moor Onshore Windfarm - EIA Scoping and Consultation and
Regulation 11 notification

[REDACTED]

Good morning,

Thank you for your email and enquiry.

I can confirm that AEN do not have any networks in the area and that we have on further
input in the planning consultation.

Kind Regards

[REDACTED]

[REDACTED] [REDACTED]

Asset Data Coordinator

[REDACTED]@advancedelectricitynetworks.co.uk

Advanced Electricity Networks

Nexus Park, Avenue East, Skyline 120, Great Notley, Braintree, Essex, CM77 7AL



Clerk to Arkengarthdale Parish Council

clerk@arkengarthdale-pc.gov.uk

25 June 2026

The Planning Inspectorate

National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

**RE: Hope Moor Wind Farm – EIA Scoping Report (EN0110038) –
Representation in Response to Scoping Consultation**

Dear Sir/Madam,

As the Clerk to Arkengarthdale Parish Council, one of the neighbouring parishes to the proposed site for the Hope Moor Wind Farm, I write to share the views of residents within the parish. The Parish Council has provided an impartial route for information to be shared with residents and a public meeting was held to highlight important aspects of the report and to collate views from across Arkengarthdale.

The following representations are in response to the EIA Scoping Report published by Fred. Olsen Renewables Ltd (the Applicant) in May 2026 in relation to the Proposed Hope Moor Wind Farm (Project Reference EN0110038). This response by the Parish Council sets out the significant concerns regarding the scope and adequacy of the proposed Environmental Impact Assessment.

In general, the Parish Council and residents are concerned at the lack of baseline evidence that appears to be available. The following phrases occur frequently within Chapters 2 and 3: "surveys are ongoing"; "design will continue to evolve"; "details will be confirmed later"; "indicative layout". The liberal use of these phrases calls into question the completeness and reliability of the surveys, modelling and investigations, and creates a risk that scoping decisions are being made before adequate baseline information is available.

1. Habitats Regulations Assessment – North Pennine Moors Special Protection Area

Concerns have been raised about the proximity of the site—only 3.86 km—from the North Pennine Moors Special Protection Area (SPA). The species found there (which qualify the site) include breeding hen harrier, merlin, peregrine falcon, and golden plover. Flight activity surveys conducted between April 2022 and February 2024 recorded all four qualifying species over the site: 13 hen harrier flights, 15 merlin flights, 19 peregrine falcon flights, and 67 golden plover flights. It should be noted that this provides evidenced continued use of the footprint of the proposed wind farm by qualifying species.

While it has been acknowledged that a Habitat Regulations Assessment will be legally required under the Conservation of Habitats and Species Regulations, the applicant is seeking to defer providing the required information until a later stage in the process. To this end, the Parish Council would request that the applicant is required to carry out a precautionary HRA Screening Assessment, agreed with Natural England, prior to submission of the DCO application.

Page 172 of the report states, "there are no non-statutory designated sites with cited ornithological features located within 2 km of the Site". There is a concern however that distance alone has been relied upon for this statement. Distance is not the legal test: rather, it should be examined whether there is a credible route along which qualifying SPA species could be affected and therefore more weighting should be given to the SPA.

The report also states that only designated sites within a 20 km study area will be considered since that is deemed sufficient for identifying links. Numerous SPA qualifying birds do not simply behave in accordance with foraging distances. Instead, their movements depend on breeding success, disturbance, habitat management etc. meaning they can quite often travel beyond what could be regarded as a 'typical' distance.

With regard to the lack of justification provided, the Parish Council would also question whether the applicant has sufficiently demonstrated that no other SPA populations use the area and that there is no overlap between populations.

We would also request that red kites are not scoped out from the detailed assessment since they have recorded the highest single species flight count during the surveys; again, no sufficient justification has been provided for this omission.

We would also like evidence-based confirmation that the project will not adversely affect the integrity of the North Pennine Moors SPA, having regard to cumulative effects with other plans and projects. This is especially relevant since the report repeatedly states that future work will determine whether qualifying SPA species use the site. However, this poses a significant issue since scoping decisions are being made before the extent of SPA usage has been demonstrated. We would argue that the applicant should be required to take a default approach of protection of species and areas, and only exclude where there is a strong evidence base to support any such decision.

2. Impacts on the Yorkshire Dales National Park and Dark Sky Reserve

The proposed wind farm will be sited immediately adjacent to the north-east boundary of the Yorkshire Dales National Park (YDNP). The nearest proposed viewpoint (VP1, Stang Top) lies within the YDNP at a distance of only 0.8 km from the site boundary. Turbines of up to 200 m tip height would be visible across a wide swathe of the National Park.

Significant concerns have been raised that the scoping report does not define any limits for what could be seen as an acceptable impact on the YDNP's special qualities. The applicant does not seem to demonstrate that any alternative layout

capable of reducing the impact has been explored in any meaningful way. Given that the YDNP has a statutory purpose to conserve wildlife, cultural heritage and encourage public enjoyment (for both locals and visitors), there is very little discussion in the report of how a major industrial development such as a wind farm situated less than 1 km from the boundary will impact those statutory purposes.

Furthermore, all turbines exceeding 150 m to blade tip must carry mandatory aviation warning lighting under the Air Navigation Order 2016. The scoping report acknowledges a potential adverse effect on the Yorkshire Dales Dark Sky Reserve from this lighting but treats it as a matter for later assessment rather than a potential constraint on the scheme. The Yorkshire Dales holds International Dark Sky Reserve status, which is a material consideration that requires specific and robust assessment at the earliest opportunity, rather than the inadequate treatment in the report. To this end, the Parish Council requests that the scoping opinion requires the applicant to carry out a specific assessment of effects on the special qualities of the YDNP, agreed with the YDNP Authority and Natural England, including effects on the Dark Sky Reserve, with specific modelling. Furthermore, it has been proven that static visualisations cannot adequately represent flashing lights, changing weather conditions, cloud reflections, snow conditions, prolonged viewing and cumulative night-time perception while walking or driving. In addition the Parish Council would argue that the applicant's proposal to assess only four nighttime viewpoints is inadequate given the incredibly extensive area frequented by visitors in connection with the reserve.

A further important point to note at this stage is the issue of tranquillity and remoteness as a special quality that needs to be assessed, despite the inherent difficulties in quantifying it. The methodology used by the report is predominantly based on GLVIA, which is effective at assessing visual landscape impacts. However, the emotional responses of people, perceived wildness and remoteness, and the cumulative industrialisation of a significant and widespread undeveloped natural area are less effectively captured, thereby running the risk that tranquillity and peace is not recognised as a broader environmental quality.

Arkengarthdale in general has a background noise level of 29dB, which is very low. This is characterised in accepted descriptions as exceptionally peaceful with mainly natural sounds, ideal for noise sensitive individuals and predominantly the noise of bird song and the wind, all of which can be seen to cumulatively improve health and wellbeing.

Residents are concerned about the noise of construction and maintenance traffic, in addition to the turbines themselves being the cause of permanent nuisance noise. There appears to be very little specific reporting or investigations designed around the specific topology of the dale and the way in which sound carries, which is rather unique in places. The Parish Council therefore request that the applicant designs specific testing over a much wider area to assess the potential impact.

3. Blanket Bog and Peat – an Irreplaceable Habitat

The Site contains extensive deep peat across the central and western parts of the wind farm array. Phase 1 peat depth surveys recorded depths reaching a maximum of 4.91 m, with approximately 47% of probes showing depths of 0.31 m or greater. Blanket bog is classified as an irreplaceable habitat under the National Planning Policy Framework, meaning loss cannot be adequately compensated.

The scoping report's assertion that no peat in 'near natural condition' exists on the Site is based solely on a desk-based satellite review and has not been verified by detailed field survey. In fact, at a drop-in session, a Councillor specifically asked the person who undertook the survey if they had visited the area in question and the person replied that they had not visited at all.

This lack of site verification poses a serious concern to the Parish Council.

Furthermore, this assertion that no peat in 'near natural condition' exists on the Site is used to support a relatively permissive approach to peat disturbance in the scoping process, yet the Phase 2 peat depth survey (at 10 m grid spacing at infrastructure locations) and the Peatland Condition Assessment are both deferred to the Environmental Survey (ES) stage.

The Parish Council request that the Scoping Opinion require:

- The Phase 2 peat depth survey to be completed before submission of the DCO application, not deferred.
- A full Peatland Condition Assessment to be submitted with the ES, including independent verification of the claim that no near-natural peatland exists on site.
- A presumption against infrastructure siting in areas of deep peat (>0.5 m) unless demonstrably unavoidable.

Finally, local residents are concerned since they know from experience that when any changes are made on the moors (e.g. ditches dug or cleared) this always causes water to find another course, generally downwards to the lower populated and farmed parts of Arkengarthdale and further on down the dale and the Arkle Beck. Furthermore, there is a risk of displaced contaminated ground water should it be diverted over the numerous mining remains. The Parish Council requests that a fuller and more complete impact assessment of potential flood risks and flooding impact is carried out in conjunction with the hydrology report and it covers a much wider area than suggested.

4. Omission of Grid Connection from the EIA Scope

The Applicant has proposed that the grid connection—including all export cabling and the off-site substation—are completely scoped out from the DCO application and EIA. Their justification for this is that the point of connection is currently unknown (for which they cite precedents from offshore wind and nuclear projects).

This approach is inappropriate for an onshore wind farm. Although it may be permissible from a legal perspective, with regard to the environmental assessment it creates an artificial distinction between the infrastructure, since the grid connection is functionally integral to the development: without it the project cannot operate. The precedents cited (Brechfa Forest West, Hinkley Point C, Morgan and Morecambe Offshore) relate to fundamentally different development types where separate grid infrastructure is inherent to the technology. The scoping out of the connection means that potential environmental impacts, including such things as cable routing through upland peat, watercourse crossings, visual impact of any overhead lines or compound infrastructure, will receive no EIA scrutiny within this application. Furthermore, the cumulative effect of associated grid infrastructure is largely absent.

One of the main concerns facing residents of Arkengarthdale is the lack of information provided within this report in respect of those things that will impact them locally and personally. The community cannot determine whether their property may be in or near a connection route, whether a significant landscape may be impacted, protected habitats might be traversed or what level of construction activity may occur outside of the wind farm boundary.

The Parish Council therefore requests that, as a minimum, the Scoping Opinion requires the ES to include an assessment of indicative grid connection route options and their likely significant environmental effects. It is important that these are seen and therefore treated as integral to the project or, if treated separately, as committed associated development for the purposes of cumulative assessment.

5. Scheduled Monument Within the Site Boundary

The scoping report confirms that a prehistoric cairn on Hope Moor, designated as a Scheduled Monument, lies within the site boundary. The report acknowledges 61 additional non-designated heritage assets reflecting prehistoric and post-medieval activity, together with 31 lead mine shaft entries and evidence of historic coal workings.

The presence of a Scheduled Monument within the site demands specific and early assessment of direct and setting impacts. The scoping report does not demonstrate any buffer or exclusion zone around the monument, nor does it present any commitment to avoiding direct disturbance. The application of the Rochdale Envelope approach—including an unspecified micro-siting allowance—creates a risk that turbine or infrastructure positions could be adjusted towards the monument post-consent.

The Parish Council want to request that Historic England's views on appropriate setting buffers for this monument be sought as part of the scoping process, and that the ES include a specific assessment of direct and setting impacts on the Scheduled Monument.

6. Design Flexibility and Rochdale Envelope Risks

The scoping report applies the Rochdale Envelope approach to a very wide range of project elements, including turbine positions (with an unspecified micro-siting allowance), the haul road (two alignment options remain under consideration), borrow pit locations, cable routes, other access roads, compound positions, and the substation. Taken together, this means a substantial portion of the development could differ significantly from what is assessed in the ES.

While the Rochdale Envelope is an established and legitimate EIA methodology, there are legitimate concerns that, in this instance, it is being used as a way in which to postpone numerous material decisions to the post-consent stage. For sensitive receptors—including the SPA qualifying species breeding territories, the Scheduled Monument, and areas of deep peat—micro-siting towards these features could cause harm that was not assessed at the consent stage.

We request that the Scoping Opinion require the micro-siting allowance to be explicitly bounded and quantified, and that the outer limits of any micro-siting zone be assessed against sensitive receptors. Road and access options should be narrowed to a single preferred option before submission where feasible. Overall, the parish council is concerned that it is not possible to undertake a meaningful environmental assessment if the project layout remains predominantly flexible.

7. Tourism, Recreation, and the Dark Sky Reserve

The surrounding area supports significant internationally-important tourism and recreation, including users of the Pennine Way, the Coast to Coast trail, NCN Route 71, the Teesdale Way, the Barningham Trail, and numerous other long-distance routes. The socio-economic chapter of the scoping report does not assess potential negative effects on tourism or the visitor economy associated with the YDNP, the North Pennines, or the wider rural area.

This is a significant omission and the Parish Council is of the opinion that there should be a dedicated section in the ES on the potential impact on tourism and it should be treated as a receptor in its own right. Topics covered should include the visitor economy, tourism businesses, and recreational users, including both visitors to the YDNP and the North Pennines. This is because tourism cannot be solely regarded as an economic statistic but should be viewed from its intrinsic relationship to the quality of the landscape, tranquillity, cultural heritage, recreational experience and dark skies.

It should be noted that the area has been growing in importance as a filming location. The recent successful Hollywood film "Wuthering Heights" was shot in or extremely close to the proposed development site. This creates a direct economic benefit to the wider area from the filming itself as well as delivering a significant indirect benefit through the consequent boost in tourism.

We trust that the above concerns will be taken into account in the Scoping Opinion issued by the Secretary of State, and that consultees are given adequate opportunity to engage with the Applicant on these matters during the pre-application phase.

Finally, the Parish Council would like the Inspectorate to be aware that the Applicant did not provide the Scoping Document until approximately 2 weeks after the consultation period began, which has reduced the ability for smaller consultees and the wider community to engage as fully as possible in the consultation process. We hope that the Inspectorate will encourage the Applicant to commit to providing communities with their full consultation rights going forward.

The Parish Council would be grateful for confirmation of receipt of this representation.

Yours faithfully,

A black rectangular box redacting the signature of the Clerk to Arkengarthdale Parish Council.

Clerk to Arkengarthdale Parish Council

Application No: 26/02042/NSIP

CONNO

**TOWN AND COUNTRY PLANNING ACT, 1990 (AS AMENDED)
TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE)
(ENGLAND) ORDER 2015**

**Fred Olsen Renewables Ltd
C/O Emily Park
Environmental Services, Infrastructure, Decisions And
Application Service
Planning Inspectorate
C/o Quadient
69 Buckingham Avenue
Slough
SL1 4PN**

Consultation Response

Proposal: Scoping consultation by Planning Inspectorate for the Hope Moor Wind Farm.
Location: Out Of Area Hope Moor Onshore Wind Farm
Applicant: Fred Olsen Renewables Ltd

City of Bradford Metropolitan District Council has the following comments to make.

1. Thank you for consulting the City of Bradford Metropolitan District Council regarding the Environmental Impact Assessment (EIA) Scoping Report for the proposed Hope Moor Wind Farm

We have reviewed the preliminary site boundaries and details provided by the applicant, Fred. Olsen Renewables Ltd . Given that the proposed development is located approximately 80 km (50 miles) north of our administrative boundary, we conclude that the project will have no direct, localised environmental, highways, or amenity impacts on the Bradford District.

Accordingly, we offer no specific comments on the scope of the EIA at this stage and defers detailed assessment to the principal host authorities (North Yorkshire Council and Durham County Council). We reserve the right to engage in future statutory consultation stages should wider regional cumulative infrastructure matters arise.



The Coal
Authority

200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T: 01623 637 119 (Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

**For the attention of: Ms E Park – Senior Environmental Advisor (PIEMA)
The Planning Inspectorate**

Our ref: ENSIP- 56

9th June 2026

Dear Ms Park

Re: EN0110038 - Hope Moor Onshore Windfarm – EIA Scoping and Consultation

Thank you for your notification of the 29th May 2026 seeking the views of the Coal Authority on the above.

The Coal Authority, trading as the Mining Remediation Authority, is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

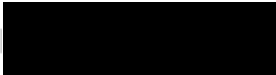
Our records indicate that there is a small area of probable coal workings within the site identified. Although outside of our remit, there are also lead mining features within the area including mine entries. All of these mining features pose a potential risk to surface stability and public safety.

The submission is supported by an EIA Scoping Report, dated May 2026 and prepared by SLR Consulting Ltd. This report acknowledges the coal mining and other mineral mining legacy within the site. This document confirms that ground stability matters will be considered in a Mining Risk Assessment. It also draws attention to Appendix 10A - Mining Risk Assessment (Mason Evans 2023). This report makes recommendations for intrusive site investigations to establish risks posed by past mineral workings. We assume that this includes the probable coal workings our records indicate in the area.

We are satisfied that the developer will consider ground stability risks, and based on the information submitted, this will include potential risks posed by coal mining legacy. We are pleased to see that mining is 'scoped in' as identified in Table 10.3 of the Scoping Report.

Please do not hesitate to contact me should you wish to discuss this further.

Yours sincerely


 BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI
Principal Planning & Development Manager

Disclaimer

The above consultation response is provided by the Coal Authority as a statutory consultee and is based upon the latest available data and the electronic consultation records held by the Coal Authority since 1 April 2013. The comments made are also based on the information provided to the Coal Authority and/or information that has been published for consultation purposes. The views and conclusions contained in this response may be subject to review and amendment by the Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided.

In formulating this response the Coal Authority has taken full account of the professional conclusions reached by the competent person who has prepared the Coal Mining Risk Assessment or other similar report. In the event that any future claim for liability arises in relation to this development the Coal Authority will take full account of the views, conclusions and mitigation previously expressed by the professional advisors for this development in relation to ground conditions and the acceptability of development.



DARLINGTON
Borough Council

**ECONOMY AND PUBLIC
PROTECTION GROUP**

Town Hall, Darlington DL1 5QT

Environmental Services Infrastructure Decisions and
Applications Service
Planning Inspectorate

[REDACTED]
[REDACTED]@darlington.gov.uk

10th June 2026

By email only

HopeMoorWindFarm@planninginspectorate.gov.uk

Our ref:

Your ref: EN0110038

Please ask for: [REDACTED]

Document Name: 1006261

Dear Sir/Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

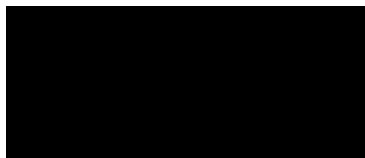
Proposed application by Fred. Olsen Renewables Ltd (the applicant) for an Order granting Development Consent for the Hope Moor Wind Farm (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if required

I write further to your letter dated 29th May 2026 regarding the above matter.

I can confirm that Darlington Borough Council has no comments to make on this occasion.

Yours sincerely



Interim Head of Planning Development Management

Contact: Claire Teasdale
Direct Tel: 03000 261390
email: claire.teasdale@durham.gov.uk
Our ref: AACON/26/01234
Your ref: EN0110038



Planning Inspectorate
Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
C/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

HopeMoorWindFarm@planninginspectorate.gov.uk

26 June 2026

Dear Sir/Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

Proposed Scoping Opinion Consultation from the Planning Inspectorate under the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) - Regulations 10 and 11
Proposed application by Fred. Olson Renewables Ltd (the applicant) for an Order granting Development Consent for the Hope Moor Wind Farm (the proposed development)
Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested
At Hope Moor Wind Farm
For Planning Inspectorate

Thank you for your letter dated 29 May 2026 in which you consult Durham County Council (DCC) in response to a Scoping Opinion request made to you by Fred. Olson Renewables Ltd. regarding the above proposed development.

It is expected that the information required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) is included in any Environmental Statement (ES) submitted. The ES must therefore include the information set out in Regulation 14(2) and meet the requirements of Regulations 14(3) and 14(4) of the EIA Regulations. It must also include the information set out in Schedule 4 of the EIA

Regeneration, Economy and Growth

Durham County Council, Planning Development (Strategic), PO BOX 274, Stanley, Co. Durham,
DH8 1HG
Main Telephone: 03000 262 830

Regulations that is relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected.

Scope of the Environmental Statement

Having reviewed the Scoping Report (May 2026) for the Hope Moor Wind Farm, it is noted that the applicant provides an indicative outline ES structure and identifies the expected environmental topics that would be considered and 'scoped in' and 'scoped out'. In addition, it is noted that certain elements for each 'scoped in' topic are 'scoped out' of the assessments.

Topics proposed to be 'scoped in'

- Landscape and Visual
- Archaeology and Cultural Heritage
- Ecology
- Ornithology
- Hydrology and Hydrogeology
- Geology, Soils and Ground Conditions
- Access, Traffic and Transport
- Noise and Vibration
- Aviation, Radar and Telecommunications
- Shadow Flicker
- Air Quality
- Carbon and Climate Change

Topics proposed to be 'scoped out':

- Socio-economics and Tourism
- Material Assets and Waste
- Human Health
- Major Accidents and Disasters
- Onward transmission infrastructure: the wider transmission assets extending from an off-site substation to the national electricity transmission network.

DCC agrees with the topics proposed to be 'scoped in', however do not agree with all of the matters proposed to be 'scoped out' of those topics. Furthermore, DCC disagrees with topics proposed to be 'scoped out'.

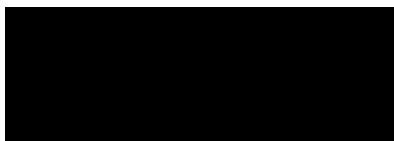
Specialist teams from within the Council have been consulted and their comments have been incorporated into the comments on each of the chapter topics set out in Appendix 1 (at the end of this letter) which provides reasoning for the Council's position. In addition, general comments are made.

It is appreciated that it is for the Planning Inspectorate to provide the Scoping Opinion and to decide the acceptability of the approach proposed by the applicant to the ES, but regard should also be had to comments received from relevant consultation bodies.

In addition, regard should be had to organisations who may have made comments, for example Parish Councils and Parish Meetings, who are not prescribed consultation bodies for the purposes of the EIA Regulations.

Comments forwarded to the Council from the Hope Moor Action Group response to the Scoping Report are attached in Appendices 3 and 4 to this response and should also be taken into account.

Yours faithfully



Principal Planning Officer

Encs.

- Appendix 1 – Durham County Council Comments on Proposed ES Topics
 - Appendix 2 – Durham County Council Solar and Wind Farm Drainage Guidance
 - Appendix 3 – Hope Moor Scoping Community Input
 - Appendix 4 – Scoping Appendix Hope Moor Wind Farm Action Group CIC
- 24.06.2026

Durham County Council Comments on Proposed ES Topics

Chapter 2. Project Description

General

All elements of the proposed development as set out in Paragraph 1.1.3 and Section 2.5 of the submitted 'Scoping Report (May 2026)' (referred to here after as the Scoping Report) should be clearly described and fully assessed as currently there is very little information.

Amongst other matters details of the underground cables including their location on site and beyond (refer to Grid Connection comments below) as well as the batching plant referred to would be required. Details of site compounds, temporary permanent and site access tracks along with crane pads would all be required along with lighting etc. It is noted that offsite highway works would be required and details of these would need to be assessed.

Reference is made in the Scoping Report to borrow pits to supply the development. The ES should set out the likely location, size and volume of materials to be excavated, it should also set out alternative options, should the borrow pits not provide the material required and any implications of this. In addition, whether or not blasting would be required and the potential effects of this especially in this sensitive location. Further comments on borrow pits are set out below.

Alternatives

Section 2.9 of the submitted Scoping Report refers to the proposed approach regarding alternatives. The ES would need to include an explanation of the main reasons for the selection of alternatives, and a comparison of environmental effects given the sensitivities of the site.

Grid connection

Of concern is that no details of the grid connection are provided and it is proposed to scope this out of the project. The submitted Scoping Report paragraph 2.5.47 seeks to distinguish between grid connection infrastructure assets of Onward transmission infrastructure and Project-specific connection infrastructure.

Paragraph 2.5.48 of the Scoping Report states that the Applicant's position is that the onward transmission infrastructure does not form part of the scope of the Project. Paragraph 2.5.52 states that "the grid connection infrastructure, including the export connection cables and the off-Site substation, would be subject to detailed environmental assessment requirements when brought forward by the third party responsible for its delivery. The Applicant has prepared Appendix 2A which explains its position on these matters. It is requested that the Scoping Opinion confirms this approach, in line with section 4.11 of the National Policy Statement for Energy (EN-1), which confirms that where there is the absence of information about both forms of grid connections, these are capable of being scoped out on the basis that a meaningful assessment cannot be carried out".

The Council has concerns given this approach and notes the recent Raeshaw Farms Ltd v Scottish Ministers [2026] CSIH 10 and considers that the grid connection infrastructure, including the export connection cables and the off-site substation, should be included in the proposed DCO to allow the project as a whole to be considered. At the very least route options should be included and assessed. The benefits of the development cannot given weight if the proposed development is reliant on another grant of planning permission which may or may not be granted. It may be considered that the intended application is premature. It is noted that highway modifications would be considered in the ES and the site boundary refined to include highway modifications to accommodate ALLV movements if necessary (Scoping Report paragraphs 2.5.54 and 2.5.33). The same approach should be applied to the cable connection or else the development and its environmental impacts cannot be fully considered.

Chapter 3. Approach to EIA Cumulative Effects

It is noted that a cumulative effects assessment is scoped into each of the topics to be considered in the ES. Notwithstanding this there should be a standalone chapter that brings cumulative effects together and provides an overall assessment.

The impacts of the development need to be assessed and where appropriate mitigation/controls through the DCO be imposed to reduce the impacts where identified.

Cumulative impacts section 3.11 of the submitted Scoping Report. Table 3-2: Initial Stage 1 Long List requires updating. DCOs not referred to East Coast Hydrogen Teesside Pipeline (Northern Gas Networks) and East Coast Hydrogen Humber Pipeline (Northern Gas Networks), both pre-application but currently requesting Scoping Opinions from PINS. Byers Gill is now post decision.

It is noted that Figure 3.1 Cumulative Developments shows a range of NSIP developments at the various project stages in the region. It also shows operational, consented and pending applications for windfarms in the region. The plan/assessment does not show other consented renewable applications or pending applications which may be relevant in considering cumulative effects. In addition, it appears that regard has not been had to the other major developments including the active Hulands Quarry, Kilmond Wood Quarry which are within 10km of the site. There are other active quarries within beyond 10km. No consideration has been given to other major development consents which may be of relevance. Details of applications made to Durham County Council are available to view on the Council's website at <https://publicaccess.durham.gov.uk/online-applications/search.do?action=simple&searchType=Application>

Regard should also be had to comments made in Chapter 5. Landscape and Visual regarding cumulative effects below.

Decommissioning

It is noted that the topics to be included in the ES propose to 'scope out' decommissioning stating that works would be carried out in accordance with an approved Decommissioning Plan expected to include the same safeguards as during the construction stage of the project which will be outlined in the EIA. On the basis of what is stated in the Scoping Report, that all turbines would have would not be operational during decommissioning, it is agreed that shadow flicker would not need to be addressed. However, for other matters given the absence of detail at this stage the matters cannot be 'scoped out'.

Chapter 5. Landscape and Visual General

Table 3.2.

The Initial Stage 1 Long List includes a number of operational sites in County Durham that have the potential to have cumulative effects with the proposals. It is stated in 3.11.6 that projects that are built or operational at the time that any baseline survey data were collected would be classified as part of the baseline conditions for the purposes of the EIA. DCC notes that the proposed methodology as set out in the LVIA takes a potentially different approach which assesses cumulative effects with reference to those of consented or proposed development. DCC would support the approach set out in the LVIA. As noted in pre-app discussion this is of particular importance to the assessment of cumulative effects on the special qualities and statutory purposes of the NPNL. Assessment should include the effects of other commercial scale turbines close to the edge of the NPNL at Kiln Pit Hill and Boundary Lane.

LVIA

Study area (5.2)

The 45K wider study area is generally appropriate. DCC would note that cumulative effects on the NPNL of the developments mentioned above are just outside of this distance range.

DCC would not consider the 20km focus on landscape character effects to be appropriate in this context. The proposed turbines would be visible and notable features in views from substantial areas of high moorland ridges and summits in the Lune Forest and Mickle Fell area at up to around 30km. They would be visible and notable features in views from substantial areas of high moorland ridges north of Teesdale – Langdon, Newbiggin & Middleton Commons and Pikestone & Woodland Fells at distances of 20km-40km.

In these very open upland landscapes, with typically clean sweeping skyline lacking in man-made features, effects can be of a greater magnitude at greater distances than in the settled and more visually complex lowlands. It might be anticipated that significant effects would not arise beyond 20km in landscapes to the east, though DCC would note that the northern watershed of the Tees - from where high ground running through the site forms a prominent southern skyline in views across the Tees Vale – extends just beyond the 20km in the Bolam area to the north-east.

Baseline Environment (5.3)

As mentioned in pre-app discussions there are a number of additional information sources that will inform the understanding of landscape character, landscape value, landscape sensitivity and landscape designations. These include:

NPNL Landscape Character Framework (part of the emerging NPNL Management Plan)
Tees Swale Local Landscape Character Assessment

[County Durham Landscape Character Assessment](#) (2008)
[County Durham Landscape Strategy](#) (2008)
[CountyDurhamLandscapeValueAssessment.pdf](#) (2019)
[CountyDurhamLocalLandscapeDesignationReview.pdf](#) (2019)
[WindTurbineDevelopmentEvidencePaper.pdf](#) (2019)

Proposed Assessment Methodology

Paragraph 5.4.5 of the Scoping Report states that effects on National Scenic Areas will be considered against their special landscape qualities. This should reference National Parks and National Landscapes and effects on their statutory purposes and special qualities.

The approach taken to the assessment of cumulative effects – that it will deal with effects arising from the addition of the project to the cumulative situation - in line with NatureScot cumulative assessment guidance (2021) (Ref 5-24) and Landscape Institute Technical Guidance Note LITGN – 2024-01 (Ref 5-16) is supported.

5.6.3 makes reference again to visibility beyond 20km being limited to patches on elevated hill tops. As noted above DCC's understanding is that visibility in those distance ranges include substantial areas of high moorland ridges and summits, the majority of it open access land and crossed in places by footpaths and minor roads, from where extensive views are a key characteristic of landscape character and take in open skylines largely free of vertical structures. It is from areas such as these that wildness / naturalness / remoteness / tranquillity and beauty of the National Landscape are often most readily appreciated. Turbines of this size are typically notable features at this distance range – that is, readily noticeable to casual observers - in reasonable weather conditions.

5.6.9 concludes that the potential for significant landscape character effects may only arise within an area of approximately 20km radius from the proposed wind turbines. Experience of smaller turbines (circa 100m) viewed at similar distance ranges where they are notable features even in visually complex views would suggest that 200m turbines could give rise to effects of a medium magnitude in open landscapes of the types affected here, which could give rise to potentially significant effects on those of higher sensitivity. This will be critical to understanding effects on the NPPL and YDNP and needs to be tested through the LVIA process. It should not limit the scope of the study area at this stage.

Landscape Character

As noted in pre-app discussions there are differences between the landscape typologies used in neighbouring authorities. It may be the case that landscape types and character areas from local authority Landscape Character Assessments are adopted for ease as the reporting units but it will be important to choose these carefully to avoid inconsistency and to adequately assess effects on landscape character.

As noted in pre-app discussions the NPPL has a landscape character framework that pulls together Durham, Northumberland and Cumbria LCAs. This doesn't cover North Yorkshire. A cross-boundary typology was produced for the Tees-Swale project which may be informative.

Further discussion is needed on how neighbouring Landscape Character Assessments are best reconciled. It will be important that the assessment of effects on the Pennine upland landscapes in the YDNP and NPPL is done with a degree of consistency at some level

otherwise the granularity and place - specific nature of landscape character areas (as opposed to the underlying Landscape Character Types) may obscure this.

The Landscape Character Areas (LCAS) identified in the scoping report in Durham / NPNL are not appropriate.

Figure 5.7 shows County Character Areas (CCA) from the CDLCA - which are the detailed local mapping of National Character Areas – alongside LCAs from the NYLCA which are of a different order – intermediate in scale between NCAs/CCAs and the Broad Character Areas (BCA) identified in the CDLCA. CCAs are not the appropriate assessment units on their own. They are no different to NCAs and lack the distinction between moorland and dales landscape that will be critical to understanding effects on landscape character for the purpose of this assessment.

The CDLCA identifies variations in landscape character as several levels.

- County Character Areas (CCA) – those parts of NCAs lying within Durham - e.g. *The North Pennines*.
- Broad Landscape Types (BLT) – broad types within the CCA - e.g. *Moorland Ridges & Summits*
- Broad Character Areas (BCA) – geographical areas belonging to a BLT – e.g. *Mickle Fell and Lune Forest*.
- Local Landscape types (LLT) – a finer grain of typology – e.g. *Moorland Ridge, Moorland Slope, Moorland Valley, Moorland Gill*
- Local Landscape Sub-types (LLST) – a further layer of classification – e.g. *Blanket Bog, Grass Moor* (enclosed), *Old Whinstone Quarry*.

Typically, LVIA for development such as this in County Durham would include assessment of effects on CCA, BLT and BCA at least, with further subdivision of BCA where needed to assess local effects.

For this LVIA Broad Landscape Types (BLT) and Broad Character Areas (BCA) from the CDLA are likely to be the most appropriate analysis/ reporting units for areas in Durham. The assessment should also be informed by Local Landscape Types where appropriate. DCC can provide ESRI shapefiles of the relevant typologies.

5.6.10 states that *Assessment in the LVIA. In particular, the landscape character assessment will focus on assessing the likely significant effects on the LCAs in which the Project is located, where the Project may result in direct effects on the pattern of elements that comprise the landscape character, together with LCAs in the immediately adjacent area where the Project may result in indirect effects on the perception of the landscape character.*

DCC would be concerned if the term *immediately adjacent area* indicated a more restricted area of enquiry than the study area. DCC would suggest that all LCAS in an appropriate study area - and certainly >20km to the north, south and west - need to be assessed.

Table 5.2

The entry for Durham Castle and Cathedral WHS states no theoretical visibility. In considering effects on the WHS it is effect on views of rather than views from the WHS that are a primary concern in relation to its OUV. The ZTV indicates visibility of some turbines directly in the backdrop of the WHS in views from the Frankland Farm / Frankland

Park area. At around 43km it is unlikely that effects would be significant for the purposes of an LVIA but Heritage consultants may need to consider this in more detail.

Consideration may also need to be given to NDHA landscapes such as parklands identified on the County Durham Local List of Parks, Gardens and Designed Landscapes. A conversation may need to be had with Heritage specialists about if and how these are dealt with – either as landscape or heritage receptors.

National Landscape Designations Special Qualities

The special qualities of the NPNL that contribute to its natural beauty are now set out in greater detail in the emerging Management Plan. Those included in the latest draft include:

- **Diverse and distinctive upland landscape character**
- A unique geology recognised in international designation as a UNESCO Global Geopark
- A nationally and internationally important assemblage of species and habitats
- Nationally important peatlands
- **A strong sense of wildness, naturalness, remoteness and tranquillity.**
- **Unrivalled dark skies**
- **Outstanding scenic beauty**
- A rich cultural heritage
- A long and distinctive farming heritage
- A unique mining heritage
- Exceptional access to nature

Those highlighted in bold are likely to be the most susceptible to the effects of development outside of the NPNL. DCC would endorse the general approach to the assessment of effects on Special Qualities (5.6.20) with respect to the use of NatureScot guidance. There is guidance in the North Pennines AONB Planning Guidelines, the County Durham Plan Wind Turbine Evidence Paper and the emerging NPNL Management Plan on the effects of development outside of the National Landscape.

Visual Receptors

The omission of open access land from the list of ‘principal visual receptors’ understates the importance of access land to recreational users of the NPNL and YDNP. Rights of access to open land have been in place for sufficient time now for some areas to have become well used and for vantage points on individual fell tops and landmark features such as summits, trig points and cairns to have become important destinations irrespective of the lack of public rights of way. Effects on these need to be understood as they contribute to the SQs of the protected landscapes. In some cases it will be from those areas that qualities such as wildness / naturalness / remoteness / tranquillity / scenic beauty are best appreciated.

Figure 5.10 – A Pennine Journey is a nationally promoted long distance walking route featured on OS 1:50,000 and 1:25,000 maps and is missing from the list/map. It has views of the development- for example from the Swinhope Head- Ettersgill stretch.

Viewpoint selection

5.6.22. It is stated that *in line with NatureScot guidance (Ref 5-1), it is proposed that photomontages will be prepared for viewpoints where they are located within a 20 km radius of the proposed wind turbines.*

What NatureScot guidance says is:

*Given the limitations of depicting turbines in photomontages, their production will usually be of most value for views within 20km of a wind farm site, for turbines up to 150 metres high to blade tip. At distances greater than this it can be difficult to represent the turbines well on a photomontage. However, this will depend on issues such as the specific wind farm design and environmental conditions, **so this parameter, and which viewpoints require photomontage, should be discussed and agreed with the determining authority and consultees.***

As these are 200m high turbines rather than 150m turbines and visible across extensive areas of protected landscapes at distances >20km where we anticipate significant effects could occur, this parameter, and which viewpoints require photomontage, will need to be discussed in detail with consultees including DCC NPNL and YDNP.

The Preliminary Representative Viewpoints List (Table 5-3) has many limitations and will not serve the assessment well. It is particularly weak on vantage points within the NPNL. It is understood that the list will be refined through consultation which will be the best place for detailed consideration. Initial observations are as follows.

The only viewpoint from the Moorland Plateau BLT (CDLCA) - VP15 - is from a layby on the A66. This is not representative of views from this landscape. Additional viewpoints for consideration include:

- The Pennine Way (PROW Cotherstone F6) at Race Yate (Cotherstone Moor BCA)
- The well visited summit of Shacklesborough (Cotherstone Moor BCA)

Viewpoints in Cumbria might include:

- The summit of High Skald Fell or Meldon Hill.

There are no viewpoints from the Moorland Ridges & Summits north of Lunedale. Additional viewpoints for consideration include:

- PROW Holwick F7 at Hagworm Hill (Lune Forest & Mickel Fell BCA)
- A Pennine Journey (PROW Lunedale F11) west of Kirkcarrion ((Lune Forest & Mickel Fell / Lunedale Moorland Fringe BCA)

There are no viewpoints from the Moorland Ridges & Summits on the northern flanks of Teesdale. Additional viewpoints for consideration include:

- UNC22.5 or byway Forest & Frith F14 around Coldberry End, Grasshill Common (Langdon, Newbiggin & Middleton Commons BCA)
- C28 or A Pennine Journey (PROW Forest & Frith F61) south of Swinhope Head (Langdon, Newbiggin & Middleton Commons BCA)
- PROW Middleton-in-Teesdale F11 Monks Moor (Langdon, Newbiggin & Middleton Commons BCA)
- B6278 crossing Long Man / Little Egglestone Head (Pikestone & Woodland Fells)

There are no viewpoints on the northern watershed of the Tees Vale where the development would be omnipresent on the southern skyline in all of the panoramic views of the Vale from higher vantage points. Additional viewpoints for consideration include:

- Billy Lane at Jagger Hill (Langleydale BCA)
- Dent Gate Lane at Penny Hill (Raby Hill & Marwood BCA),
- A688 around Keverstone Grange (Bolam, Hilton & Wackerfield BCA)
- Morton Tinmouth Lane at Stob Hill Bolam (Bolam, Hilton & Wackerfield BCA)
- B6275 at Leggs Cross (Bolam, Hilton & Wackerfield BCA)

There are no viewpoints from Lower Teesdale BCA. Additional viewpoints for consideration include:

- A viewpoint on the Teesdale Way or PROPW Eggleston F40 in the Barnley area on the eastern flanks of the dale opposite Romalldkirk

There are no viewpoints from Barningham Moor, where significant effects are likely to occur. Additional viewpoints for consideration include:

- A viewpoint from the PROW network on the moor such as byway Barningham F24 around West Langborough.

This list is not comprehensive and will need to be discussed further.

Potential effects of Visible Aviation Lighting

DCC would endorse the general approach to the assessment of Aviation Lighting with respect to the use of NatureScot guidance.

It is stated at 5.6.24 that *The assessment approach and night time visualisations will be in accordance with NatureScot guidance (Ref 5-22), which recommends a Study Area of 20 km for the assessment of visible aviation lighting.*

What NatureScot guidance actually says is:

*Experience suggests that a study area of between approximately 10km - 20km, depending on the extent of predicted visibility and relevant sensitivities, should be sufficient to ensure significant effects are captured. **In some circumstances a larger study area may be appropriate, and the precise requirements should be agreed at scoping stage.***

The NPNL and the YDNP that are identified as displaying dark sky qualities that will be especially sensitive to the introduction of visible aviation lighting. Dark skies are identified a special quality of the NPNL. The remoteness of the North Pennines from major areas of settlement and the relatively low level of light pollution gives the area some of the darkest skies in England and among the best opportunities to observe the stars and planets. 16 sites within the NPNL have been designated as Dark Sky Discovery Sites: more than anywhere else in the UK. These aren't referenced in the scoping report. No viewpoints are identified in the NPNL.

The NPNL team can provide data on the location of DSDS.

Further discussion is needed on establishing the study area, methodology and viewpoints for this element of the assessment.

Potential Cumulative Effects

DCC would endorse the general approach to the assessment of cumulative effects with respect to the use of NatureScot guidance.

Figure 5.2 shows Boundary Lane wind farm in the wrong place – south-west of Derwent Reservoir. Boundary Lane and Kiln Pit Hill lie just outside of the 45km study area. As discussed previously they play a part in the cumulative effect of wind energy development on the SQs of the NPNL – which should form part of the assessment.

DCC would not support at this stage the assertion that cumulative effects would be ‘minimal at worst’. A number of wind farms already effect the special qualities of the NPNL to some degree in the north. There is a significant cluster of wind development on the edge of the NPNL around 34KM to the north around Tow Law – which are visible in clear conditions from the site. There will be receptors between the two – including some within the NPNL - where turbines would be intervisible at distance ranges where they would both be notable or prominent features. There will be cumulative effects on sequential views within the NPNL, and cumulative effects on its SQs which will need to be fully understood.

Potential effects summary.

5.6.30 Bullet point 1 references Durham LCA 1 North Pennines alongside North Yorkshire LCA33 Gritstone High Plateau. As noted above County Character Areas are not the appropriate assessment units.

Potential Impacts scoped in

Operation and maintenance:

- reference is made to LCAs within 20km: see comments above on this issue.
- Reference is made to identified viewpoints in Table5-3: see comments above on this issue.
- Reference is made to receptors within 20km in the assessment of visible aviation lighting: see comments above on this issue.

Impacts scoped out.

Operation and maintenance

- reference is made to LCAs beyond 20km: see comments above on this issue. DCC disagree strongly with assertion that *LCAs beyond 20km are shown on the scoping ZTVs to have distant, limited or no visibility and therefore do not have the potential for significant visual effects*. There is clearly extensive visibility in LCAs in the 20-30km range where 200m turbines would be visible and notable features. Given the sensitivity of some of the landscapes affected there is potential for significant effects at these distance ranges and they should not be scoped out. Some LCA could be scoped out within the wider 45km study area to focus the assessment on potentially significant effects: this will require agreement firstly on the mapping geography of reporting units.
- Reference is made to Table 5-2: see comments above on WHS. This can be scoped out of the LVIA provided that the issue is articulated in the heritage assessment.

- Reference is made to effects of lighting beyond 20km and NatureScot guidance: see comments above on that issue. Methodology needs further refinement having regards to NPNL dark skies SQ and DSDS before a study area can be finalised.

Further Consideration for Consultees

Q6.1: Do consultees have any comments on the proposed approach and methodology?

Answer: Yes. Detailed comments provided.

Q6.2: Do consultees agree with the proposed 45km LVIA Study Area?

Answer: Yes. Subject to qualification in detailed comments provided.

Q6.3: Do consultees agree that the assessment of the effects on landscape character receptors (except landscape planning designations) should focus on areas within a 20 km radius of the proposed wind turbines?

Answer: No. Detailed comments provided.

Q6.4: Do consultees agree with the proposal to scope out the Landscape Planning Designations where no further assessment is proposed for the LVIA, as set out in Table 5-2.

Answer: Yes. Subject to qualification in detailed comments provided.

Q6.5: Do consultees have any comments or suggestions in relation to the Preliminary Representative Viewpoint Locations shown in Table 5-3 and illustrated on Figures 5.2 - 5.5?

Answer: Yes. Detailed comments provided.

Q6.6: Do consultees have any further comments or suggestions relating to the cumulative assessment or the preliminary cumulative sites shown on Figure 5.11?

Answer: Yes. Detailed comments provided.

It is noted that Arboricultural impact assessments/method statements may be required.

Chapter 6. Archaeology and Cultural Heritage

Archaeology

In general terms, DCC is supportive of the measures proposed in Chapter 6 of the submitted Scoping Report. In respect of archaeology and as is for the most part detailed in the Chapter, Desk Based Assessment, and detailed and systematic archaeological walk-over survey and assessment, are essential. This should all inform further stages of Archaeological Field Evaluation and survey.

Due to the Scoping Boundary and potential development area being located across both County Durham and North Yorkshire, close consultation with both Councils would be

essential to ensure a measured and comprehensive response to the potential impacts on this rich archaeological landscape.

At this early stage, there should be consideration of how the Historic Environment can be safe-guarded during future decommissioning of the site.

Comments specific to the following sections in the submitted Scoping Report:

6.4.4 – Regarding the “absence of specific prescribed criteria for the assessment of impacts on built heritage” DCC would request that this scope should also be agreed with the Archaeological Officers, not just Historic England and local Conservation Officers.

6.4.33 – It is assumed that the survey detailed in this section (“to establish the condition of any recorded assets and identify the potential for any additional presently unrecorded assets”) would be in addition to the ‘walkover survey’ of “all land within the site” mentioned in section **6.4.12**. However, clarity is required on this point.

6.4.34 - In addition to ZTV and satellite imagery, DCC advise the use of LiDAR and historic aerial photography. The latter techniques may also aid in identifying and/or confirming the presence of unrecorded or previously unknown assets.

6.5.3 – DCC suggest that the scoping element should identify if any assets are currently on the Heritage At Risk register. There may be an opportunity to improve the condition of such sites and thus enable their removal from the register, a ‘public benefit’ which could be defined in the ES.

Table 6.6 (p121)- related to the line “Direct physical impacts on non-designated heritage assets within the Site” and specifically the bullet point “Consideration of evaluative fieldwork (e.g. geophysical survey, trial trenching) if required to clarify archaeological potential”: DCC advise that evaluative fieldwork is essential. All imprints and areas where groundworks are to be undertaken should be subject to archaeological survey, to include evaluative fieldwork. In areas where usual ground-based geophysical survey cannot be undertaken we would advise the consideration of newer techniques (for example, the use of drones to carry out geophysical survey). If there are areas where geophysical survey simply cannot be completed, then it is strongly advised that a higher degree (in practice, a higher percentage sampling) of trial trenching is conducted.

In addition, the indirect effect of the construction of turbines is that it effectively makes the surrounding areas also un-surveyable in the future, due to interference from the turbines. As such, DCC would advise that wider areas are considered for survey, rather than just the physical footprint, to mitigate against this.

It is also recommended the consideration of other archaeological survey techniques, including Auger Surveys, which may be particularly useful in collating geoarchaeological data in advance of future mitigation works.

Cultural Heritage

Matters relating to scheduled monuments and below ground heritage are covered by the separate response from Archaeology.

Appendix 6B, tables 2-6 cover Grade I and II* listed buildings withing 10km, Grade II listed buildings within 5km, Registered Parks and Gardens, and conservation areas within 5km.

All of these assets are proposed to be scoped out from further assessment. From a design and conservation perspective DCC would disagree with all these assets as a whole being scoped out at this stage.

Grade I and II* listed assets

Whilst the methodology outlined is in line with typical approaches to assessing impacts on the significance of designated heritage assets through setting, including national guidance from Historic England, the conclusions are frequently over-generalised and incorrect. In many cases consideration of the impacts on setting have been discounted despite the visibility of turbines (often up to 23) in views. Due to the scale of the proposal there is the potential for the turbines to be highly prominent in views from, to, and through numerous designated heritage assets and thus potentially impact on their respective settings.

There is a frequently used justification in many cases within tables 2-6 that the significance of assets derives from their architectural significance or setting at close quarters, however this is not always the case – there are numerous examples where this generalization cannot be made without further assessment. On this basis there are many heritage assets for which it is not possible to scope out at this stage without further detailed assessment.

A notable example of these concerns is in relation to Bowes Museum (ref. 1218235 and 1292074). In Table 2 it states that their setting derives from their gardens only, however there are designed key views from the asset which take advantage of the wider landscape to the south, which are fundamental to their significance.

There are other examples where views are noted as only being significant in certain directions out from assets (e.g. Bowes Castle), or where wider landscape setting is not considered important which would be disputed. This demonstrates a mis-interpretation of the contribution that setting plays to the significance of these heritage assets.

In numerous other cases it is noted that impacts on the setting of designated heritage assets are not ‘anticipated’ however these claims are generally unsubstantiated and therefore should not be scoped out of future assessment at this stage. Furthermore in the case of Rokeby Park, and Mortham Tower, it is noted that woodland may screen views to some extent. Again however, without evidence to substantiate this fact, it cannot be taken for granted based on an anticipation of this being the fact.

Grade II listed buildings;

Table 6-7 states *Grade II Listed Buildings and Grade II Registered Parks and Gardens outside of 5km of the proposed wind turbines can be scoped out of the EIA in relation to cultural heritage with the exception of those wherein specific views are considered to contribute to their significance and/or to the ability to appreciate and experience them.* No assessment of Grade II listed assets beyond 5km have been provided to justify this point.

Conservation Areas

Conservation Areas (CA) beyond 5km have not been considered. Due to the scale of the proposal this assessment parameter would need to be extended. Within 10km are four further CAs, which, due to the surrounding topography, their significance derives in part from their wider landscape settings on the edge of (or within) the Pennines.

In the case of Barningham Conservation Area, the Pennine landscape provides a fundamental contribution towards the setting of the conservation area, and it has been identified that the turbines will be visible in certain views through and out of the conservation area. As such it is disagreed that this should be scoped out at this stage.

There are numerous designated, and non-designated heritage assets within the conservation area which have similarly been scoped out without full assessment and consideration, and would require more in depth assessment.

Durham Castle and Cathedral World Heritage Site (WHS)

Figure 5.2 identifies that there is potential visibility of the turbines from Durham Castle and Cathedral WHS in views through the WHS from the northeast where they may be featured in the WHS backdrop. It is acknowledged that this is at a substantial distance, however bearing in mind that this is a designation of the highest level, i.e. International significance, the potential impact on its setting would need to be assessed. Its setting within the landscape is a fundamental contributor towards its Statement of Outstanding Universal Value, and is acknowledged to extend significant distances from its boundary. This could result in an impact on its setting with the proposal site being within its backdrop in key views from the northeast.

Non-Designated Heritage Assets

No assessment is included in appendix 6B of the impact on the setting of any above ground Non-Designated Heritage Assets, and paragraph 6.7.1 notes that non-designated heritage assets within the Study Area are to be scoped out from further assessment. Although at a lower level of significance, the impact on their respective settings may nonetheless need to be considered and cannot be scoped out at this stage without any form assessment.

Conclusion

Overall, due to the scale of the proposal the radius search area should be increased; the ZTV maps demonstrate that the proposal site would be potentially visible from many miles away across substantial areas of County Durham and therefore there is great potential for impacts on the settings of many designated heritage assets. Paragraph 6.6.8 states that no heritage assets beyond 10km have been identified, but no further evidence to justify this conclusion has been provided.

The assessment methodology is based on approaches used commonly elsewhere and on relevant guidance which would be considered appropriate. Whilst this may be the case the level of evidence to scope out assessment of all listed buildings, conservation areas or non-designated heritage assets at this stage is over generalised and based on a high level of presumption and anticipation of impact. Although many assets could be justifiably scoped out of further assessment, there appears to be a lack of understanding of the potential impacts that may arise on a case-by-case basis in many instances, and there is the potential for a harmful impact on the setting on many designated heritage assets. Therefore, more solid evidence or consideration would be expected before such a significant number of heritage assets can be scoped out at this early stage.

Chapter 7. Ecology

DCC is concerned about the approach taken to irreplaceable habitats and deep peat. The scoping report indicates that NVC surveys have been used to identify habitats, but these alone are not sufficient to identify areas of deep peat. While specific plant communities strongly indicate peatland environments, physical peat probing or GPR is required to accurately gauge peat depth.

Table 7-6 of the 'Scoping Report (May 2026) Main Text': 'Impacts proposed to be scoped into the assessment for Ecology' does imply that further direct investigation is proposed and that 'post-scoping high resolution peat depth surveys' will be used. However, the

actual survey technique is not defined, and it might be that remote assessment techniques are being proposed; these would need field validation.

It is noted that the Stage 1 Consultation by the applicant includes a map of 'Peat depth and quality' however there is no information on how the data underpinning the map was arrived at. The locations of turbines, haul roads and tracks will require ground validation using peat probing or GPR to establish the absence of deep peat.

Table 7-2: 'Habitats present on Site' does not highlight degraded blanket bog as an irreplaceable habitat.

Killing and injury to low collision risk bat species recorded at the site is scoped out. DCC is unsure as to whether this is possible at this stage as the bat activity surveys are incomplete and bat activity is a factor in determining the vulnerability of the bat populations to the wind farm.

Impacts on protected / notable species and fragmentation are scoped in, with the assessment of impact being based on extant surveys work and data, this approach appears sound in principle, but further surveys might be required if final locations of infrastructure introduce a greater risk of impact.

Surveys for reptiles, amphibians, invertebrates and other priority mammal species are not proposed based on lack of significant impacts anticipated. However, until the location of infrastructure is known these impacts cannot be scoped out, certainly reptiles are of concern as impacts on adder hibernation sites would be highly significant.

The advice of Natural England will also be important to the consideration of this topic.

Chapter 8. Ornithology

Breeding territories have been recorded within The Stang woodland. It is noted that Nightjar is proposed to be scoped out of the EIA (paragraph 8.7.4 of the 'Scoping Report (May 2026) Main Text') despite turbine locations proposed on the edge of the plantation. The report in Milvus 4:1 (2025) does conclude that collisions with turbines by nightjar is unusual and that for the sites in Wales population impacts are not expected, although bird collisions were not explicitly part of the study. We have been unable to access the Mynydd Maen Wind Farm Environmental Statement. DCC would prefer if Nightjar remain scoped in until a further narrative around their exclusion has been established.

The advice of Natural England will also be important to the consideration of this topic.

Chapter 9. Hydrology and Hydrogeology

The advice of the Environment Agency and Natural England will be of importance to the consideration of this topic.

The development should comply with DCC's Guidance relating to drainage considerations for constructing and maintaining solar and wind farms (Appendix 2).

Chapter 10. Geology, Soils and Ground Conditions

DCC is satisfied with the proposed approach to contaminated land detailed in Section 10.4 of the submitted Scoping Report.

Due to the presence of potentially contaminated land onsite, had this been an application for determination by DCC the following contaminated land requirements would be applied to any grant of planning permission:

Contaminated Land (Phase 1-3)

No development shall commence until a land contamination scheme has been submitted to and approved in writing by the Local Planning Authority. The submitted scheme shall be compliant with the YALPAG guidance and include a Phase 1 preliminary risk assessment (desk top study).

If the phase 1 assessment identifies that further investigation is required a Phase 2 site investigation shall be carried out, which shall include a sampling and analysis plan. If the Phase 2 identifies any unacceptable risks, a Phase 3 remediation strategy shall be produced and where necessary include gas protection measures and method of verification.

Reason: To ensure that the presence of contamination is identified, risk assessed and proposed remediation works are agreed in order to ensure the site is suitable for use, in accordance with Part 15 of the National Planning Policy Framework. Required to be pre-commencement to ensure that the development can be carried out safely.

Contaminated Land (Phase 4)

Remediation works shall be carried out in accordance with the approved remediation strategy. The development shall not be brought into use until such time a Phase 4 verification report related to that part of the development has been submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the remediation works are fully implemented as agreed and the site is suitable for use, in accordance with Part 15 of the National Planning Policy Framework.

In addition, the following would be added as an informative:

If unforeseen contamination is encountered, the Local Planning Authority shall be notified in writing immediately. Operations on the affected part of the site shall cease until an investigation and risk assessment, and if necessary a remediation strategy is carried out in accordance with the YALPAG guidance and agreed with the Local Planning Authority. The development shall be completed in accordance with any amended specification of works.

Note: Following the submission of a preliminary ground gas risk assessment, for some developments the Local Planning Authority may agree in writing to the installation of Gas Protection Measures as a precautionary measure without first carrying out ground gas monitoring.

The advice of Natural England will also be important to the consideration of this topic in respect of peat, and your attention is also directed to the comments under Chapter 7. Ecology relating to peat.

Chapter 11. Access, Traffic and Transport

DCC Highways (Development Management) advise that once operational, a wind farm would be unlikely to generate any significant vehicle movements on the local road network. The main traffic generation would be during the construction phase. This traffic could be controlled by a Construction Management Plan.

On that basis, impact on DCC controlled roads is likely to be negligible outside of the construction and decommissioning period.

In terms of rights of way, whilst plans are indicative at present for the proposed site, there are several public rights of way within the indicated boundary, including 2 public bridleways.

There seems to be no mention of assessing the impact, both visual and physical, on use of Open Access land, on which the proposal will stand.

When considering base data sources, NE Open Access mapping should be included for 5. Landscape and Visual, and 11. Access, Traffic and Transport, as the proposal would have a significant impact upon the visual amenity and use of the area. Natural England should be contacted for any guidance on potential temporary closures during any construction phase.

BHS guidance should also be considered as best practice when considering turbine placement in relation to the public bridleways within the site.

It is noted that the public right of way network within a 5km radius of the site will be included in the Landscape and Visual assessment and consider that acceptable.

DCC should be included as Highway Authority in Paragraph 11.4.48 of the Scoping Report Consultation, to clarify matters around PROW locations, usage and management.

It is noted in Table 11-6 that Temporary delays to PROW users and changes in journey length will be scoped in. This should also consider Open Access.

Chapter 12. Noise and Vibration

DCC agree with the proposals with regard to the proposed approach and methodologies set out in Chapter 12 'Noise and Vibration'- of the of the submitted Scoping Report. DDC is also in agreement with the impacts proposed to be scoped into the assessment for Noise and Vibration and also the impacts proposed to be scoped out of assessment for Noise and Vibration.

Whilst having concerns in relation to certain sound characteristics associated with onshore wind turbines, particularly Amplitude Modulation (AM), DCC concur that current national guidance and policy on wind turbine noise assessment indicate that specific assessments of infrasound, low-frequency noise and excess amplitude modulation are outside the scope of ETSU-R-97 and the IOA GPG, and that such characteristics are best controlled through appropriately worded planning conditions, this is approach is supported within the Department for Business, Energy & Industrial Strategy commissioned report titled- 'A Review Of Noise Guidance For Onshore Wind Turbines' prepared by WSP Revision 05 dated September 2023, available via <https://www.ioa.org.uk/news/New-report--Assessing-onshore-wind-farm-noise> .

DCC agree with the proposed methodology set out within Chapter 12; and agree with the proposal to scope out operational traffic noise; operational vibration; infrasound, low-frequency noise and excess amplitude modulation and decommissioning from further assessment.

Chapter 13. Aviation, Radar and Telecommunications

Although these are matters that other specialist consultation bodies will comment upon, regard must be had to comments made above in response to Chapter 5. Landscape and Visual in respect of aviation lighting.

Chapter 14. Shadow Flicker

DCC agree with the proposed approach and methodologies set out in Chapter 14 'Shadow Flicker- of the of the submitted Scoping Report. In addition, it is confirmed that DCC is in general agreement with the impacts proposed to be scoped into the assessment for Shadow Flicker and also the impacts proposed to be scoped out of assessment for Shadow Flicker, however it is suggested that the definition of sensitive receptors should be extended to include offices and schools, if any fall within the proposed Shadow Flicker study area.

DCC agree with the area to be assessed for shadow flicker effects is sufficient, in regard to nuisance/amenity consideration. DCC would expect the definition of sensitive receptors should be extended to include offices and schools, if any fall within the proposed Shadow Flicker study area.

Chapter 15. Air Quality

DCC agree with the proposals with regard to the proposed approach and methodologies set out in Chapter 15 of the submitted Scoping Report. In addition, DCC is in agreement with the impacts proposed to be scoped into the assessment for Air Quality and also the impacts proposed to be scoped out of assessment for Quality. It is agreed that appropriate guidance and legislation have been identified within the Chapter, and the methodology is appropriate and proportionate.

Chapter 16. Carbon and Climate Change

In relation to tables 16 -2 and 16-3 of the submitted Scoping Report DCC agree with the impacts scoped into the EIA and agree with those scoped out.

References are made to peat in Chapter 7. Ecology and Chapter 10. Geology, Soils and Ground Conditions above. The disturbance of peat as pointed out in 10.3.10 of the submitted Scoping Report is of concern, however the Peat Management Plan is supported as a way to mitigate harmful impacts and as a consequence it is agreed that this should be Scoped in.

The submitted Scoping Report paragraph 2.2.11 states geologically, the site is underlain by carboniferous formations of the Yoredale Group, with extensive deep peat (>200 cm) across central and western areas and shallower peat along the eastern access track. Paragraph 2.6.16 to 2.6.18 addresses the proposed peat management plan (PMP). Paragraph 18.2.26 states that prior to commencement of onsite works, a Stage 2 outline PMP will be prepared to minimise environmental impact by limiting peat excavation, reducing carbon loss, and ensuring safe reuse.

Given the importance of peat as a carbon store consideration should be given to understanding and quantifying the significance of the projects impact on onsite peat resources as a carbon store. This will be important to address concerns which may be raised by the public or other stakeholders through the planning application process.

In terms of peat that Policy 41 of the CDP states that development proposals which are likely to result in the loss or deterioration of irreplaceable habitat(s) (such as peatlands or lowland fen) will not be permitted unless there are wholly exceptional reasons and a suitable compensation strategy exists. Similarly, Policy CC2 of the draft National Planning Policy Framework states 1) 'In order to contribute to climate change mitigation and the transition to net zero, development proposals should, where relevant to the proposal:' at f) 'Contribute to the creation or restoration of habitats which can act as carbon stores, such as through woodland planting and peatland restoration, while avoiding harm to habitats which can act as important carbon stores, including peatland and salt marsh; and'. Whilst very limited weight can be given to the draft NPPF at this time, its provisions show the direction of travel of Government in recognising the importance of habitats which can act as important carbon stores.

Chapter 17. Socio-Economics

Although 'scoped out' it is noted that a states that a proportionate standalone socio-economics and tourism report would be prepared and submitted alongside the EIA documentation. This would consider matters such as employment generation, local expenditure, tourism, and any indirect or induced effects arising from the Project (Paragraph 17.1.4 of the Scoping Report (May 2026) Main Text and Table 19-2). Nevertheless, DCC considers that this should not be 'scoped out' and consideration should be given to the impact during all stages of the proposed development. This should include the impact on public rights of way where there is a potential for significant effects.

Visit County Durham has commented in respect of tourism and visitor economy. The visitor economy is a significant contributor to the economy of County Durham and the surrounding area, supporting employment, local businesses, hospitality, attractions and rural communities. The landscape surrounding Barnard Castle, the North Pennines and the Yorkshire Dales forms an important part of the area's tourism offer, attracting visitors seeking tranquillity, outstanding scenery, outdoor recreation, cycling, walking and heritage experiences.

While recognising the national importance of renewable energy generation and the UK's net zero ambitions, it is essential that the Environmental Impact Assessment fully considers the potential implications for tourism and the visitor economy rather than assuming these impacts are negligible.

In particular, the assessment should:

- Include a comprehensive evidence-based Tourism and Visitor Economy Impact Assessment that quantifies the potential effects on visitor numbers, visitor spend and local employment.
- Assess impacts on the perception and quality of the landscape, recognising that scenic value is itself a tourism asset and part of the destination's competitive advantage.
- Consider cumulative visual impacts alongside existing and proposed energy infrastructure across the wider area rather than assessing the development in isolation.

- Evaluate impacts on key visitor experiences including walking, cycling, dark skies, wildlife tourism and heritage-based tourism.
- Consider effects on businesses whose success depends upon the area's environmental quality, including accommodation providers, hospitality businesses, attractions and outdoor activity operators.
- Assess construction impacts, including traffic, access restrictions and disruption to visitor routes during peak tourism periods.
- Include appropriate visitor surveys and business engagement to ensure the assessment reflects actual market behaviour rather than relying solely on generic national assumptions.

The current consultation material places considerable emphasis on environmental mitigation and community benefits. However, there appears to be limited information regarding the methodology that will be used to understand potential tourism impacts. Given the scale of the proposal, with turbines up to 200 metres in height, this should form a distinct and robust component of the Environmental Statement.

The current documentation refers to general engagement with local communities, community representatives and statutory consultees, but it does not appear to set out a targeted approach to engaging destination management organisations, tourism businesses, visitor attractions, accommodation providers, event organisers, cultural venues, or recreation and access stakeholders as a distinct stakeholder group. That is a significant gap given the sensitivity of the surrounding visitor destination and the importance of tourism to the local economy. Visit County Durham therefore recommends that, ahead of stage two consultation, the applicant establishes a specific tourism and visitor economy stakeholder engagement programme.

Should the project proceed, consideration should also be given to measures that mitigate any adverse impacts on the visitor economy, including protection of key viewpoints and visitor routes, careful management of construction activity, investment in visitor infrastructure where appropriate, and ongoing monitoring of tourism performance following implementation.

Chapter 18. Other Environmental Topics

18.2 Material Assets and Waste

Insufficient information has been provided to enable this topic to be scoped out.

The submitted Scoping Report explains the rationale for scoping out material assets and waste from the EIA (paragraphs 18.2.22 to 18.2.30). Paragraph 18.2.22 states that the intention is that the majority of the material assets and waste arising from the Project would be managed on-site. Where off-Site management is required, recycling and recovery routes would be preferred, with landfill disposal as the final option. Paragraph 18.2.25 explains that, with regards to the materials required for the infrastructure works such as aggregates, quantities required have not been fully defined but it is thought that these will be sourced from borrow pits (within the red line boundary of the Project) and local markets. Depending upon the quantities of materials required, there is the possibility that these may put pressure on existing local supply chains in the region. Paragraph 18.2.30 states that based on the indicative construction waste volumes and the substantial capacity of existing regional waste infrastructure as set out in Table 18-5, and the embedded commitments set out in Section 18.4, no likely significant effects on material assets and waste are anticipated during the construction, operation, maintenance, and

decommissioning of the Project. As waste would be managed in accordance with the waste hierarchy, it is assumed that disposal to landfill would be minimal, and it is on this basis that (with a commitment to develop the outline management plans set out at Paragraph 18.2.20 above) it is proposed that the material assets and waste topic is scoped out of the EIA and further assessment is not proposed.

Table 18-5 considers waste from construction, operation and maintenance decommissioning and cumulative impacts. The following comments focus on construction waste. The table explains that wastes generated on site during the construction phase of the Project are anticipated to be largely excavation wastes, although other general construction wastes would also be generated. It provides a waste case calculation that estimates construction waste generation (including excavation wastes) could be in the order of 287,900 m³, although this figure is subject to a number of caveats. Notwithstanding these caveats this quantum of waste is not insignificant and equivalent to ~262,000 tonnes (using a conversion factor of 1 ton to 1.1 cubic metres). If this waste were to be exported off site this would be equivalent to 13,086 laden 20 tonne HGVs. If this waste were to be managed on site and not exported to be disposed at a licensed waste management facility a relevant question would be how would this waste be managed on site and if recovery to land or disposal to land was required where and how would this occur. Furthermore, should the waste be managed at licensed landfill sites it is observed that the landfill site study area is defined as the entire North East and Yorkshire and Humber and which had a capacity at the end of 2024 of 72.2 million cubic metres. It is considered that this study area is not realistic and that a more reasonable study area should be limited to landfill sites in neighbouring areas of County Durham, the Tees Valley and North Yorkshire which would more realistically reflect the reality of transportation costs and need to reduce vehicle miles. It is considered that hazardous merchant landfill capacity should be excluded as this would be unlikely to be available for this project. It is also noted that a large proportion of landfill void space in North Yorkshire is located at non-hazardous landfill sites specifically at Drax and Gale Common in Knottingley both of which are geographically distant to the site. It is also noted that the study area does not consider neighbouring areas of the North West in Cumbria, this is agreeable, given the distance of the remaining five landfill sites in Cumbria, the nearest of which lies to the north west of Newbiggin, near Penrith.

In overall terms it is suggested that the ES should not scope out how construction wastes are to be managed. The management of 287,900 cubic metres of construction waste either on site or if removed from the site is significant. It is also suggested that given that the materials required for the infrastructure works such as aggregates have not been fully defined - but could be sourced from borrow pits - that the uncertainty of quantities and the possibility that the project may put pressure on existing local supply chains in the region that the aggregate requirements for construction works should also not be scoped out. This is because there is no clarity on the quantity of aggregates required or either the onsite or off-site locations where the aggregates will be sourced.

18.3 Human Health

The submitted Scoping Report at paragraph 18.3.35 sets out the rationale for scoping out human health from the EIA. Stating when considering the health characteristics of the zone of influence and the mitigation outlined included in Chapter 18, it is considered unlikely to result in any significant beneficial or adverse human health effects.

It is recommended that human health impacts be summarised within a dedicated chapter of the ES noting the requirements of Regulation 5(2) and Schedule 4, Paragraphs 4 and 5 of the 2017 Regulations.

Public Health Durham consider that a Health Impact Assessment should be submitted regarding the impact wind farms have on the health of the population including those who live in the vicinity and users of the area.

18.4 Major Accidents and Disasters

Chapter 18 of the submitted Scoping Report at paragraph 18.4.7 sets out why the applicant considers that it is feasible to scope out major accidents and disasters from the EIA for the Project but noting that certain matters would be considered in other assessments. It is proposed that all identified risks would be managed through established design standards, risk assessments and control measures. However, there may be matters that have not been assessed at this stage which may give rise to effects and where the effectiveness of mitigation is not certain. It is therefore important that comments from other relevant consultation bodies are considered in respect of major accidents and disasters.

Mineral Assessment

The submitted Scoping Report refers to a Mineral Resource Assessment at paragraph 10.4.11. The County Durham Plan (CDP) mineral safeguarding areas are shown on the CDP Policies Map. With the exception of safeguarded surface mined coal all mineral safeguarding areas in County Durham are based directly by British Geological Survey (BGS) datasets secured under license from the BGS.

CDP Policy 56 provides the basis for considering mineral safeguarding and in this respect renewables development such as wind turbines are considered to be a temporary development, albeit of a long duration, and therefore the supporting text to Policy 56 explains that careful consideration will need to be given to the siting of such development, to avoid mineral site allocations and to ensure that the possibility of extensions to existing mineral sites are not unnecessarily impeded, or economically important mineral resources sterilised.

Consideration of the CDP Policies Map would allow the applicant to understand that there are no mineral safeguarding areas or mineral site allocations within County Durham within their identified red line boundary. <https://arcg.is/XXn8q1>. The applicant may wish to note that there are safeguarded areas of carboniferous limestone within North Yorkshire as shown on the North Yorkshire Joint Minerals and Waste Plan Policies Map and this map also shows areas within County Durham of non-safeguarded carboniferous limestone, it is not known why these areas were not present on the BGS information which provided the basis for County Durham's mineral safeguarding areas. It is considered that these areas should also be considered as of economic importance as stated in the submitted Scoping Report paragraph 10.4.11.

Borrow Pits

It is noted that the submitted Scoping Report at paragraph 2.5.29 states that, 'It is anticipated that a substantial proportion of material for track construction would be sourced from on-Site borrow pits (subject to rock suitability). Further explanation is provided at

paragraphs 2.5.34 to 2.5.37, paragraph 2.6.1, Table 8-9, Table 9-5 and paragraphs 10.4.7, 10.4.10, 11.5.2, 18.2.17, 18.2.25.

Other than stating that the quantities of aggregates required have not been fully defined but it is thought that these would be sourced from borrow pits (within the red line boundary of the Project) and local markets, no quantum is provided on total aggregate requirements for the project, or the number or spatial extent of potential borrow pits. It is understood that any site aggregates may be sourced from onsite carboniferous limestone geology which may require the removal of overlying soils and overburden including peat, blasting (as occurs in other carboniferous limestone quarries in County Durham), mechanical extraction and screening by a mobile crusher to obtain the required aggregate followed by transport to point of use.

The winning and working of minerals through on site borrow pits is a mineral development and could have a range of unacceptable environmental effects in their own right. This will need to be considered as part of the proposed project.

Policy M9 of the County Durham Minerals and Waste Policies and Allocations Document (County Durham M&WDPD) is the relevant County Durham Policy which is applicable to Borrow Pits and cross refers to a number of other applicable policies i.e. Policy MW1 (General criteria for considering minerals and waste development), Policy MW4 (Noise), MW5 (Air Quality & Dust), M6 (Blasting), MW7 (Traffic and Transport) and MW20 (Mineral Site Restoration, Landfill and Landraise). The policies within the County Durham M&WDPD should not be considered in isolation and a number of other policies within the CDP will also be relevant.

County Durham M&WDPD Paragraph 4.89 makes it clear that the Council will always require the applicant to demonstrate that a borrow pit is the most appropriate mechanism to supply the necessary material for the associated construction project, and that the supply of material cannot be reasonably met using suitable secondary or recycled materials of appropriate quality or from existing quarries in the local area, and that the that the supply of material from such sources would be seriously detrimental to the environment and amenity of the area because of the scale, location or timing of the necessary operations. Paragraph 4.91 makes clear that the environmental impacts of borrow pits will always need to be fully considered and the working and restoration of borrow pits will always be required to be undertaken to the same high standards as longer-term mineral workings. High quality restoration with a suitable after use and after care will always be required. Applicants should demonstrate how an appropriate landform will be achieved and borrow pits should be restored without the use of imported material, other than that generated by the specified project. This will enable the transport benefits to be fully realised.

A borrow pit appraisal must address all relevant matters including the environmental acceptability of the working of any on-site mineral to produce an aggregate for use on the project. It should also set out alternatives to borrow pits and implications if they are not used.

Other matters

The submitted Scoping Report refers to sensitive receptors in respect of the various topics. Sensitive receptors for each issue should be agreed with the Council and other relevant consultation bodies.

Relevant County Durham Plan Policies

The proposed development, spans County Durham and North Yorkshire. The comments below are in relation to the County Durham planning policy context.

National Policy Statements

National Policy Statement (NPS) for Renewable Energy (EN-3), taken together with the Overarching National Policy Statement for Energy (EN-1), provides the primary policy for decisions on applications for nationally significant renewable energy infrastructure. The 2025 versions of NPS EN-1 and EN-3 came into force on 6 January 2026. The following is highlighted as being of particular relevance to this proposal:

Landscape

- The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid harming the purposes of designation or to minimise adverse impacts on designated areas, and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. (EN-1, para 5.10.8)
- Outside nationally designated areas, there are local landscapes that may be highly valued locally. Where a local development document in England or a local development plan in Wales has policies based on landscape or waterscape character assessment, these should be paid particular attention. However, locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development. (EN-1, para 5.10.11)

Heritage

- When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance. (EN-1, para 5.9.25)
- Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional. (EN-1, para 5.9.28)

Peatland

- Onshore wind farm sites within England may be proposed on peatland, however applicants should rule out other locations before siting developments on peatland. In particular, areas of deep peat, which have the highest potential for carbon emissions, should be avoided. (EN-3, para 2.12.77)

Public Rights of Way

- Applicants should design the layout and appearance of the site to ensure continued use of public rights of way where possible during construction, and in particular, during operation of the site. (EN-3, para 2.12.26)

Ecology

- As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives (as set out in Section 4.2 above). Where significant harm cannot be

avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought. (EN-1, para 5.4.42)

- Applicants should consider any reasonable opportunities to maximise restoration, creation, and enhancement of wider biodiversity. This may include considerations and opportunities identified through Local Nature Recovery Strategies, and national goals and targets set through the Environment Act 2021 and the Environmental Improvement Plan. (EN-3, para 2.12.57)

Highways

- The Secretary of State should be satisfied, taking into account the views of the relevant local highway authorities, that abnormal loads can be safely transported in a way that minimises inconvenience to other road users and that the environmental effects of this and other construction traffic, after mitigation, are acceptable. (EN-3, para 2.12.169)

National Planning Policy Framework

The NPPF sets out a range of specific national policy approaches which should also be given due regard when considering this proposal alongside relevant parts of Planning Practice Guidance (PPG), the latter providing further clarity on such matters.

In assessing this application regard should be had to the key paragraphs in the NPPF as these will be material considerations, for example:

Meeting the challenge of climate change, flooding and coastal change

NPPF Paragraph 161 states the planning system should support the transition to net zero by 2050, including supporting renewable and low carbon energy and associated infrastructure.

NPPF Paragraph 168 states local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future.

NPPF Paragraph 196 states once suitable areas for renewable and low carbon energy have been identified in plans (as the County Durham Plan does), local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.

Conserving and enhancing the natural environment

NPPF Paragraph 187 (a) looks to conserve and enhance the natural environment, protecting and enhancing valued landscapes and sites of biodiversity value, and providing net gains in biodiversity where possible.

NPPF Paragraph 187 (d) requires development to minimise impacts on and provide net gains for biodiversity.

Conserving and enhancing the historic environment

NPPF Paragraph 207 states applications should describe the significance of any heritage assets affected, including any contribution made by their setting. Where a site on which

development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

NPPF Paragraph 212 states when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

A consultation draft NPPF was issued by Government for consultation on 16 December 2025. This may be subject to change and has only limited weight as a material planning consideration at the current time.

The Development Plan

The statutory development plan for County Durham is the County Durham Plan (CDP), the Minerals and Waste Policies and Allocations Plan, together with 'made' Neighbourhood Plans. The site is not within a neighbourhood area.

Relevant policies within the County Durham Plan (CDP) are considered to include:

- Policy 10 Development in the Countryside
- Policy 14 Best and Most Versatile Agricultural Land and Soil Resource
- Policy 26 Green Infrastructure
- Policy 31 Amenity and Pollution
- Policy 33 Renewable and Low Carbon Energy
- Policy 34 Wind Turbine Development
- Policy 35 Water Management
- Policy 39 Landscape
- Policy 40 Trees, Woodland and Hedges
- Policy 41 Biodiversity and Geodiversity
- Policy 43 Protected Species and Nationally and Locally Protected Sites
- Policy 44 Historic Environment

Consistency between the development plan and current NPPF (2024)

The government's Policy Statement on Onshore Wind, published 8 July 2024, confirmed that footnotes 57 and 58 of paragraph 163 of the NPPF (December 2023) no longer apply. This included requiring onshore wind proposals to demonstrate community support. These footnotes were subsequently removed when the NPPF was revised in 2024. As such the requirement to demonstrate community backing in policy 34 is no longer considered consistent with the NPPF.

Policy 33 states significant weight will be given to the achievement of wider social, environmental and economic benefits renewable and low carbon energy projects. It is highlighted the NPPF (2024) now states significant weight should also be given to the proposal's contribution to a net zero future.

In Annex 1 'Implementation' of NPPF (December 2024) paragraph 232 explains that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them,

according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).

Principle of development

The application site lies in the countryside. Policy 10 (Development in the Countryside) does not give support to development proposals located in the countryside, unless they meet one of a number of specific exceptions set out in the policy, or unless the proposed development would be allowed by another policy in the Plan. Footnote 54 confirms relevant policies include those in relation to renewable and low carbon energy. These are policies 33 and 34.

The policy also sets out a series of criteria that development should adhere to. It is considered that the relevant Policy 10 criterion are l), o) and r). These are:

- l) give rise to unacceptable harm to the heritage, biodiversity, geodiversity, intrinsic character, beauty or tranquillity of the countryside either individually or cumulatively, which cannot be adequately mitigated or compensated for;
- o) impact adversely upon the setting, townscape qualities, including important vistas, or form of a settlement which cannot be adequately mitigated or compensated for.
- r) impact adversely upon residential or general amenity.

The generic provisions of Policy 33 (Renewable and Low Carbon Energy) apply to all renewable energy schemes including wind turbines. This policy provides support to renewable and low carbon energy development in appropriate locations and advises that significant weight will be given to the achievement of wider social, environmental and economic benefits and provides advice on detailed requirements. It also states that proposals should include details of associated developments including access roads, transmission lines, pylons and other ancillary buildings. that proposals should Where relevant, planning applications will also need to include a satisfactory scheme to restore the site to a quality of at least its original condition once operations have ceased. Where necessary, this will be secured by bond, legal agreement or condition.

Policy 34 (Wind Turbine Development) is the most relevant plan policy as it was prepared to address this specific form of development. It states that 'wind turbine development will only be permitted in the areas identified as suitable for development on the policies map and where the applicant is able to demonstrate that, following consultation, those planning-related impacts identified by any affected local communities have been fully addressed and that the proposal has their backing. In those circumstances, planning permission will be granted unless:

- a. there would be unacceptable harm, individually or cumulatively, to the amenity of local communities or nearby residents, due to noise, traffic or visual intrusion;
- b. in respect of the visual amenity of individual residential properties, any proposed turbine would be located at a distance of less than 6 times its overall height of the property, unless it can be demonstrated that it would not be overbearing;
- c. in respect of shadow flicker, any proposed turbine would be located at a distance of less than 10 times its rotor diameter from a susceptible dwelling house, community facility or workplace, unless it can be demonstrated that shadow flicker would not occur, or would be prevented from occurring;

- d. there would be unacceptable harm individually or cumulatively to priority habitats or species;
- e. there would be unacceptable harm individually or cumulatively to the character of the landscape;
- f. there would be any adverse impacts on radar and other aviation and navigation systems which are not capable of being acceptably mitigated;
- g. there would be an unacceptable adverse impact on TV reception, communications links or telecommunications systems which is not capable of being acceptably mitigated;
- h. there would be unacceptable harm either individually or cumulatively to the significance of a heritage asset or its setting; or
- i. any proposed wind turbine would be located within topple distance plus 50 metres or its height x1.5 (whichever is the lesser) of a motorway, trunk road or railway line or topple distance plus 10% of an A, B or C class road, or if its blades would over-sweep a public right of way.'

The County Durham Plan identifies suitable areas for wind turbines. It is highlighted the proposal is not within an area identified as suitable for wind turbines of any scale. In accordance with NPPF paragraph 196 applications for commercial scale proposal outside of suitable areas are to demonstrate that the proposed location meets the criteria used in identifying suitable areas. The County Durham Wind Turbine Study which determined suitable areas is available at: <https://www.durham.gov.uk/article/32186/Development-Plan-evidence-base>

Other policy considerations

Landscape Impacts

The site is identified as an area of high landscape sensitivity to wind turbine development of all scales in the County Durham Wind Turbine Study. It is in an area of Higher Landscape Value (AHLV). The North Pennines National Landscape is 2km to the north west of the site boundary.

CDP Policy 39 (Landscape) states any proposal should not cause unacceptable harm to the character, quality, or distinctiveness of the landscape, or to important features or views. CDP Policy 38 (North Pennines Area of Outstanding Natural Beauty) states any development affecting the AONB will only be permitted where it is not, individually or cumulatively, harmful to its special qualities or statutory purposes.

The views of the Council's Landscape Section are of particular importance in this regard.

Ecological Impacts

CDP Policy 41 (Biodiversity and Geodiversity) states proposals will be expected to minimise impacts on biodiversity by retaining and enhancing existing biodiversity assets and features and providing net gain for biodiversity. Proposals for new development will not be permitted if significant harm to biodiversity or geodiversity resulting from the development cannot be avoided, or appropriately mitigated, or, as a last resort, compensated for.

There are Local Wildlife Sites and Sites of Special Scientific Interest in the wider setting of the site. CDP Policy 43 (Protected Species and Nationally and Locally Protected Sites) is therefore highlighted.

Regard should be had to specialist colleagues on the level of detail required to fully understand the impact on ecology and nature conservation.

Heritage Impacts

There are scheduled ancient monuments within the site boundary and in the surrounding area. In addition, the proposal has the potential to impact on archaeology. CDP Policy 44 (Historic Environment) states proposals should sustain the significance of designated and non-designated heritage assets, including any contribution made by their setting. In accordance with the NPPF when considering the impact of development on the significance of a designated heritage asset, great weight will be given to the asset's conservation (and the more important the asset, the greater the weight will be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Comments from specialist colleagues in the Design and Conservation Team and Archaeology are of importance.

Public Rights of Way

Public Rights of Way (PROWs) intersect the site. CDP Policy 26 (Green Infrastructure) states proposals that would result in the loss of, or deterioration in the quality of, existing PROWs will not be permitted unless equivalent alternative provision of a suitable standard is made. Policy 34 criteria i) is also highlighted in relation to over-sweep and PROW. Comments from the Public Rights of Way Team provide further guidance.

Amenity

Policy 31 (Amenity and Pollution) is relevant with regards to the proposed development's potential to have amenity and pollution effects, specifically in relation to matters such as visual intrusion and dominance and noise. The policy states that development will be permitted where it can be demonstrated that there will be no unacceptable impact, either individually or cumulatively, on health, living or working conditions or the natural environment, and that the development can be integrated effectively with any existing business and community facilities. The policy goes on to say that:

- Proposals which will have an unacceptable impact such as through overlooking, visual intrusion, visual dominance or loss of light, noise or privacy will not be permitted unless satisfactory mitigation measures can be demonstrated whilst ensuring that any existing business and/or community facilities do not have any unreasonable restrictions placed upon them as a result.
- Development which has the potential to lead to, or be affected by, unacceptable levels of noise or other sources of pollution, either individually or cumulatively, will not be permitted unless identified mitigation can reduce the impact to an acceptable level.

Policy 34 criteria a) and c) also highlighted in relation to amenity impacts, including shadow flicker. Specialists in Environmental Health have provided comments.

Highway Impacts

CDP Policy 21 (Delivering Sustainable Transport) is applicable. It will be necessary to ensure that any vehicular traffic generated by new development through its construction phase can be safely accommodated on the local and strategic highway network and does not cause an unacceptable increase in congestion or air pollution and that severe congestion can be overcome by appropriate transport improvements.

Policy 34 criteria (i) is also highlighted in relation to topple distances and the highway network.

Agricultural Land

Policy 14 (Best and Most Versatile Agricultural Land and Soil Resource) states development of the best and most versatile agricultural land, will be permitted where it is demonstrated that the benefits of the development outweigh the harm, taking into account economic and other benefits. All development proposals relating to previously undeveloped land must demonstrate that soil resources will be managed and conserved in a viable condition and used sustainably in line with accepted best practice.

Water Management

Policy 35 (Water Management) states that, all development proposals will be required to consider the effect of the proposed development on flood risk, both on-site and off-site, commensurate with the scale and impact of the development and taking into account the predicted impacts of climate change for the lifetime of the proposal. This includes completion of a Flood Risk Assessment (FRA) where appropriate. The policy also requires that for major developments the management of water must be an intrinsic part of the overall development and that on all new development there is no net increase in surface water runoff for the lifetime of the development. That where greenfield sites are to be developed, the runoff rates must not exceed and where possible should reduce the existing greenfield runoff rates. On previously developed land, as close as practicable to a greenfield rate must be achieved. That surface water run-off must be managed at source wherever possible and disposed in the order addressed by the Policy. The Policy also addresses water quality.

Conclusion

It is considered key policy issues will be impacts on landscape, biodiversity, heritage, amenity, peatland, the highway and PROW network. Regard should be had to the views of specialist DCC Officers and consultation bodies in respect of these impacts.

The proposal is not within an area identified as suitable for wind turbines in the County Durham Plan. In accordance with NPPF Paragraph 196 applications for commercial scale proposal outside of suitable areas are to demonstrate that the proposed location meets the criteria used in identifying suitable areas.

Drainage And Coastal Protection

Neighbourhoods and Climate Change



General Guidance from research sources relating to drainage considerations for the construction and maintenance of varying types of Solar / Wind Farms:

Such developments can have the potential to impact on surface water flow around and from the arrays by concentrating surface water flow both from rainfall and through construction impacts upon the soil.

The site's soils and their permeability will be a major consideration, as siting on impermeable clay soils will lead to runoff channel forming, erosion and potential silting of watercourses. In contrast soils and subsoils are often thin and highly permeable when overlying Magnesian Limestone which supports the protected/designated Magnesian Limestone grasslands.

The permeability of material used for the access tracks should be taken into consideration.

A greater volume of surface water could potentially enter watercourses, or flow to adjacent areas at a greater rate than would otherwise occur in greenfield conditions due to earthworks carried out during construction. This concentration of water flow can create rills, or channelised flows, which can compact and erode the soil, and lead to the potential silting of watercourses and possible flooding.

Changing baseline drainage patterns can alter/ change subsurface flow paths such that water is preferentially moved from one receptor dependent on ground water to another (especially in a fractured aquifer like the Magnesian Limestone). Cumulative impact/ scale should be considered. Potential to lower water levels/quantity in private water supplies/ or raising groundwater levels and increasing flood extents/ duration.

Solar panels are often installed in agricultural land with potential pre-existing contaminants in the ground/groundwater. Altering the pre-development drainage could mobilise these (nitrates, herbicides, pesticides, landfill contaminants) potentially resulting in a pollution/deterioration in water quality at a receptor such as a watercourse, wetland, pond, private/public water supply borehole.

When considering the impact on flood risk and the future drainage of such developments, due consideration should be undertaken in respect of the construction phase. During this period the ground around the arrays can become compacted, and if not rectified later, may result in the run-off from the arrays draining onto semi-impermeable ground resulting in possible drainage issues. The length of lifetime of the development should be made explicit to ensure that mitigation measures for the site are effective for the lifetime of the development. This would affect any climate change allowances to be made for storage calculations for attenuation features.

Mitigation Methods

To counter these risks the following measures should be taken where appropriate:

- Undertake an assessment of the baseline run-off rates of the existing site. Compare this to the calculated greenfield allowance for a development.
- Undertake an assessment of the baseline infiltration rates and site specific baseflows to rivers. There are many areas which do not match the generic catchment hydraulic modelling criteria due to the inherent difficulties in assessing recharge or rainfall infiltration. Equally

there will be sites where a greenfield runoff rate may still cause flooding. In these cases, schemes should provide additional mitigation.

- Research the former use of the land listing possible contamination. Provide a semi-quantitative or quantitative assessment of the risk and impact on all receptors with measures to mitigate, where necessary against the risk of mobilising contaminants through the change of use and drainage of the land. Where a drainage system design maintains baseline run-off and infiltration rates this assessment may become less important.
- Research which nearby watercourses are impacted by lower than normal flows i.e. close to their (EFI) environmental flow indicator which is the minimum flow required to support good ecological status as required by the Water Framework Directive 2000. These may benefit from having more water to improve their quality and WFD status.
- To counter ground compaction from construction machinery, sub soiling by chisel plough should be carried out to break up any natural hard sub soils or construction compacted ground beneath the surface, which may otherwise cause poor drainage.
- Access roads should take account of the infiltration capacity of the soil. Where feasible, permeable materials should be used, or the road should be positively drained.
- Drainage from access roads may require attenuation control to the outflow before discharging to an identified location (e.g., a watercourse) or soakaway (where ground conditions allow). Please refer to CIRIA's SuDS Manual to inform your design of such elements.
- Structures should be sited along the contour (wherever possible) so that the water flow between rows is dispersed evenly beneath them.
- Incorporate bunds, filter drains or other measures to interrupt flows of water between structures to disperse water flows over the surface and promote infiltration into the soils.
- Incorporate wide grassed filter strips at the downstream side of the structures and maintain the grass at a long length to interrupt water flows and to promote infiltration.
- Incorporate gravel filled filter drains or swales to help infiltrate run-off (where ground conditions allow).
- There should be a soil management plan in place to ensure that the soil is kept in good condition both during and after construction, as well as for decommissioning.

Submitting a Planning Application

To support any planning application a NPPF compliant Flood Risk Assessment (FRA) and Surface Water Drainage Strategy should be submitted. This FRA should review all existing flood risks and identify any necessary mitigation measures during the construction, operational and decommissioning phases.

In respect to surface water drainage, the following information shall be included within the Surface water management proposal.

- 1) Assessment of the existing soil and sub soils and their permeability
- 2) A review of the existing surface water drainage mechanisms
- 3) Assessment of the impact from the run-off and how this will be controlled.
- 4) Details, plans, sections and calculations where necessary to demonstrate that there will be no increase in flood risk from surface water or groundwater, and total discharge from the site will be no greater than or equivalent to QBAR Rate for all events up to and including the 1 in 100year + the appropriate climate change allowance for the lifetime of the development.
- 5) Details of the future site management plan including an inspection and maintenance plan for the areas around and beneath the structures.
- 6) Details and sections of any new access roads identifying how these will be drained.

- 7) A construction management plan providing details of how the site and any temporary and permanent access roads will be drained during the installation and decommissioning. This assessment should review how the site drainage characteristics will be temporarily changed following removal of any crops, stubble or grasslands.
- 8) Identify any existing watercourses which may require crossing to form temporary or permanent access tracks and include details of any localised culverting and assessments to demonstrate that the culverts will be able to accept the flow from the 1 in 100+ 45% Climate Change storm event with an agreed freeboard. Note that where any works affecting a watercourse even of a temporary nature are involved, then an Ordinary watercourse Consent approval will be required from Durham County Council Drainage and Coastal Protection Section.

Hope Moor Wind Farm

Community Receptor

Identification Consultation

To support PINS' Scoping Opinion

05 June 2026



Resident & Process Analyst

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1 Executive Summary

This report presents the results of a community receptor-identification consultation undertaken to assist PINS' preparation of a Scoping Opinion for the proposed Hope Moor Wind Farm. The need for such an exercise was identified following the conclusion of correspondence with the Planning Inspectorate, North Yorkshire Council, and Fred Olsen Renewables. This report does not argue for or against the development. Its purpose is to identify pathways and receptors drawn from local knowledge of how the area is used, experienced, and depended upon, to reduce the risk of incomplete scoping.

The risk is fourfold: (1) important receptors may be missed, under-described, or fragmented across separate topic headings; (2) magnitude and significance may be underestimated; (3) monitoring and mitigation may not be secured; and (4) responsibility for responding to consequences should the development go ahead may be unclear or displaced onto affected people.

The community evidence is described in Section 3, which identifies a substantial number of integrated receptors – i.e. receptors affected by interrelationships and combined effects that are not adequately captured if assessed only through standard topic headings. Appendix B gives examples of the types of impact that can be missed if these receptors are not identified for assessment.

A summary checklist of matters that appear to require explicit treatment in the Scoping Opinion is provided in Section 4, which compares Section 3 with the Scoping Request. The community evidence suggests that the assessment frame needs to be widened in both scale and detail.

The comparison in Section 4 should not be treated as exhaustive. This was a limited and unofficial exercise with restricted reach, yet it identified additional receptors and integrated receptors relevant to scoping, with further potential receptors and pathways still emerging at the time of writing. This report therefore has value in identifying receptors and pathways that a desk-based or topic-by-topic approach may miss. However, because the exercise was limited, it cannot remove the concern that a narrow scoping process may leave important matters outside the assessment frame.

2 Introduction

Fred Olsen Renewables (Olsen) has been granted a Section 35 direction to apply for a Development Consent Order under the Nationally Significant Infrastructure Project (NSIP) legislation. As detailed in my tripartite note of 31st January 2026, there were no plans for community consultation during the preparation of the Scoping Request. As this risks missing important receptors in the Environmental Impact Assessment (EIA) process, I have undertaken a community consultation exercise for scoping.

This report does not contain arguments for or against the wind farm, which are not appropriate at this stage of the development. Nor does it address wider questions such as the need for renewable energy or government policy. Rather, it is focused only on helping the Planning Inspectorate (PINS) in producing a Scoping Opinion, to support future environmental assessments, planning decisions, and monitoring and mitigation should the development go ahead. To that end, the exercise was focused on identifying pathways and receptors using an online questionnaire; where text was entered that included any support for or objections to the wind farm, only the receptor identification part of the comment was included in the analysis. Although this report refers to some potential impacts, it does so only to illustrate the kinds of assessment that scoping needs to include.

The community responses were of two kinds, with some overlap between them. The first identified individual receptors that might be affected by one or two pathways. Some of these are already included in Olsen's Scoping Request, but many locations are not.

The second kind was qualitatively different, describing how pathways and receptors interact in a way that cannot be adequately assessed by examining individual components.¹ In the author's process-analysis language,² these are system-level effects or emergent properties: effects that arise from the way several pathways, uses, and settings combine, rather than from any one component alone. The community evidence of such interactions is consistent with EIA legislation,³ the

¹ Examples are provided in Appendix B.

² The author's background includes both academic and commercial experience.

³ <https://www.legislation.gov.uk/ukxi/2017/572/regulation/5>

Planning Inspectorate's NSIP guidance,⁴ and Defra's work on upland communities.⁵ These integrated receptors are grounded in local knowledge of how the area is actually used and experienced. Their omission from the Scoping Opinion risks important impacts not being assessed in the Environmental Statement (ES).

Other scoping methodologies were available that, by involving the community, would have been less likely to leave the Scoping Request unduly narrow.⁶ My unofficial community consultation was limited in time, format, and scope. It falls far short of those formal methodologies and had limited reach. Nevertheless, although limited, the exercise is useful for scoping because even a small number of locally informed submissions can identify receptors and pathways that a desk-based or topic-by-topic approach may miss. However, this report should not be viewed as having exhausted the range of receptors that may have been omitted from the Scoping Request.

The methodology is summarised in Appendix A, the numerical summary of the community data is provided in Appendix G, and the use of artificial intelligence is described in Appendix C.

⁴ <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment>

⁵ <https://www.gov.uk/government/publications/uplands-review-a-report-on-upland-communities-in-england>

⁶ For example, the International Institute for Sustainable Development (IISD) recommends that the scoping stage should include extensive publicity, exhibitions, workshops, and other public-facing activities. See: <https://www.iisd.org/learning/eia/wp-content/uploads/2016/05/Public-participation.pdf>, pp. 1-2.

3 Receptors Identified from the Community Data

The community submissions reveal several recurring themes that show scoping should include receptors whose significance arises from systemic interactions – between pathway, place, use, and setting – rather than from any single topic considered on its own. If the receiving environment is broken down only into separate functional headings – such as noise, transport, ecology, heritage, landscape, tourism, or water – impact analyses risk under-describing or missing altogether those emergent aspects of the environment. In several cases, the community evidence suggests that what matters locally is how the various topics combine in practice.

The receptors or receptor classes listed below are structured using these systemic and ‘real world’ themes. They describe recurring combinations in the community evidence that require treatment as integrated receptors rather than using a more conventional topic-by-topic approach. They correspond to real ways in which the area is relied upon, used, and experienced by residents, visitors, businesses, farmers, and others. Their exclusion from scoping creates a risk that the impacts on important receptors will not be fully or accurately assessed.

3.1 Upland Water Interdependence

A major theme in the submissions is dependence on the integrity of an integrated upland water system. The community evidence points to an interdependent system in which various pathways bear collectively on several receptors. These pathways include the conditions of peat, sphagnum moss, ponds, drainage, ecology, land use, and water quality and quantity. The various receptors include home, holiday cottage, business, farm, habitat, or downstream water environment.⁷

Much of the proposed site is shown by Natural England’s 2025 peat mapping as covered by peat, with mapped depths ranging from 30 cm to 5 m;⁸ it is also located

⁷ Shaw Beck Gill – referred to in the submissions as GCR/SSSI – was particularly highlighted for potential wet heath or blanket bog disturbance, or flash flooding. Dous Gill was highlighted for water quality because it is used to supply livestock.

⁸ Peat data: Natural England Peat Map 2025. See Appendix D.

on one of the highest moors between the rivers Tees and Swale.⁹ There were 38 declarations of private water supplies with a further 13 uncertain whether their supply is private.¹⁰

These cannot be examined in isolation because the functioning of the receptors depends on the whole system and its integrity. Deep peat, for example, is both a receptor that may be damaged and a water store whose condition helps regulate the functioning of the upland water system. It may play a significant role in helping to stabilise and maintain the quality and year-round supply of water. If the impact on individual receptors were to be examined in isolation, it may overlook the systemic impacts that are just as critical – if not more so – than the individual components.

This is especially important in relation to local water supplies, on site and in the wider area between the Tees and Swale. Community submissions identify a significant number of private supplies drawn from springs, boreholes, streams, and other water sources that may be affected by the proposed site. Those supplies are relied upon for domestic use, livestock, farming operations, hospitality businesses, or a combination of these. The significance of the receptor therefore lies in the interdependence of several pathways and receptors.

The submissions identify numerous potential impacts, many of which are related and need to be assessed as a whole, such as disturbance to peat, disused mines, faster runoff, altered drainage patterns, reduced water retention, contamination, altered water table, the potential to create or exacerbate summer drought, and heightened flood risk during heavy rainfall in settlements below the site and downstream water courses. For example, in Dousgill, the spring supplying the residences has dried up only twice in four decades. Changes to the overall water system could change the spring's reliability. The review of the hydrological system should not be confined to the site, its immediate surroundings, or just a downstream frame. It should also extend to the wider hydrologically interconnected system on which these receptors depend.

⁹ Elevation sources: OS Landranger Map.

¹⁰ Areas of private water supply were identified in Barningham, The Stang, Thwaite, Hope Moor, Dousgill, Helwith, Scargill, Kexwith, Marske, Bushy Park, Newsham, Langthwaite, Whaw, and Reeth.

As the proposed site is at the head of many local private water supplies for domestic, livestock, and agricultural use, the community submissions identified the need to assess the degree to which wind turbine construction and operation will affect the private and mains water supplies, including the supplies' reliability and potential for contamination with concrete and other relevant substances.

Another topic for assessment is the possible disturbance or mobilisation of lead, cadmium, zinc, or other contaminants associated with historic mine workings and the potential for increased contamination to enter human and food-production water sources or flow down to the Swale and Tees. Local community knowledge highlighted the presence of mines, shafts, and shake holes on and around the proposed site, not all included on official maps, together with Environment Agency assessments of water contamination (see Appendix K).

A related but separate issue is what the presence of disused mines, shafts and shake holes on and around the proposed site may mean. The assessment should not assume the absence of subsurface mining-related risk but establish whether historic workings, collapsed features or associated drainage pathways could affect water quality, the water table, or ground stability during and after construction.

Also, community submissions asked for assessment of whether PFAS or other substances associated with blade erosion could enter human and food-production water sources.¹¹ Given the sensitivity of private water supplies, the various uncertainties above should be properly assessed rather than assumed to be of little consequence.

Several watercourses, particularly to the south and east of the site, form part of a wider downstream system connected with the Swale. There is a need to assess the impact of the proposed development on downstream contamination pathways and flood-management issues, including the implications for the Ure/Ouse/York system. For example, flood mitigation plans include the Mid Swale project. The assessment should include the current river levels as well as the projected increases in forthcoming years as a result of climate change.

¹¹ In checking this issue, I found research into blade erosion but was unable to find anything that looks at the impact in hydrologically sensitive upland systems such as Hope Moor.

Questions were also raised about the proposed temporary on-site concrete batching plant.¹² Assessment should include effects on the mains supply, including consultation with relevant water companies about water demand, source, pressure, and supply in Newsham.

3.2 Multi-Pathway Disturbance

A second recurring theme is the identification of receptors exposed to multiple concurrent pathways of disturbance during construction and operation. The community data identifies layered disturbance involving noise, shadow flicker, dust, vibration, traffic, lighting, and other constructional or operational effects such as tree and hedgerow removal, or alteration/removal of stone walls. A particular issue for assessment is the concrete dust and air pollution that may be created by the temporary concrete batching plant.

The submissions also identify the need to include, within the assessment of cumulative disturbance, the additional construction and operations that are associated with connection to the grid and site access. At present there is uncertainty about pylons, power lines, and grid connection, which need to be defined and included in the Environmental Statement because it is an associated infrastructure pathway that contributes to the multi-pathway disturbance receptor.

This matters because the significance for some receptors may lie less in any one pathway taken alone than in their combined incidence. A receptor may experience not one discrete nuisance, but an accumulation of disturbances extending across construction, operation, and associated changes to environmental conditions. Some submissions indicate that certain receptors already experience intermittent disturbance from other sources, including nearby military activity from army firing ranges, RAF night-time or low-flight training, heather harvesting, lorry and tractor movements, overspill from the A66 following an accident, and the forthcoming construction project on the A66. Therefore, the assessment needs to consider how project-related disturbance may add to or interact with those existing or increasing

¹² The proposal for potential on-site concrete production wasn't in the Olsen consultation materials. It was advised to a resident orally in response to questions at a consultation session.

baseline conditions. Separate treatment of noise, dust, vibration, transport, lighting, and flicker will fail to identify the combined burden as a receptor issue and take account of forthcoming increases.

The impact analysis also needs to address conditions in which multiple turbines act together, rather than relying only on standard assumptions about a single turbine over a standard distance. It should consider whether combined effects may arise in circumstances such as shadow flicker resulting from sunlight passing through several turbines, or noise aggregation and propagation under conditions that increase audibility at residential receptors, including topography, temperature inversion, and open-window conditions during warmer periods. The assessment should therefore examine how disturbance may be experienced across the Tees, Swale, and Arkengarth dales under real-world conditions, rather than only under average or standardised assumptions, and using the latest research. The noise assessment should address repetitive swishing or thumping and sounds that are low-frequency or have a distinct pitch, particularly at night and under propagation conditions where turbines may be audible at greater distances than predicted by average assumptions.

This theme also has a residential and wellbeing dimension. Some submissions refer explicitly to health issues including sensitivity to stress, sleep disturbance, low background sound conditions, or the loss of peace and quiet at times when tranquillity is currently part of the ordinary environmental baseline. The issue here is not the assertion of any connection between a specific receptor and medical outcome. It is the need for the assessment to recognise how a receptor exposed to multiple concurrent disturbances may experience a different kind of burden from one exposed to a single pathway only.

3.3 Immersive Landscape Experience

The community data often describes the moor as an immersive landscape experience. In several submissions, the value of the landscape is described in terms of psychological restoration or the beneficial effect of being in an open upland environment with limited large-scale modern infrastructure. The overall experience is created through the interaction of the moor's many attributes, such as openness,

remoteness, tranquillity, dark skies, bird song, peat, heather, wildness, archaeology, and the absence of large-scale modern infrastructure. The experience is enhanced by 360° views across several landscapes, most of which are protected, including the Yorkshire Dales, North Pennines, Nidderdale, North York Moors, and Teesdale as far as the North Sea. The immersive character is further enhanced by dark nights that, under suitable conditions, include the visibility of the Milky Way, stargazing, and the observation of Northern Lights aurorae.

The significance of this receptor lies in the experience of moving through and engaging with a landscape whose character is valued as a whole. Residents, tourists, cyclists, horse riders, and others visit the moor for its overall experience. The assessment needs to examine the impact on that whole experience rather than just the individual parts. The potential impact will not be captured if scoping treats views, routes, noise, wildlife, and landscape character as unrelated, piecemeal matters and overlooks how they interact to create an immersive landscape experience.

3.4 Heritage Character

Community submissions identified a heritage character whose significance is shaped in part by individual assets¹³ and in part by the setting, intervisibility, and the wider historic landscape of the moor. The community submissions suggest that this applies in two directions. First, the proposed site itself – and possibly nearby new access roads and grid connection – contains heritage features whose significance depends in part on the moorland context in which they are situated. On the proposed site there are historic routes, prehistoric landscape features, ancient rock-art or carvings, burial features, archaeological remains, and prehistoric settlement remains and stone features. Beyond the site, there are listed buildings, scheduled monuments, conservation areas, castles, and other designated heritage assets. However, the significance of this receptor does not lie just in the presence of those individual features. It also lies in the way the open moor contributes to their character, setting, and relationship to one another.

¹³ A large number of Historic England sites were identified in the vicinity of the proposed site. See Appendix I.

Secondly, the proposed site also forms part of the landscape setting of heritage assets beyond it. Indicative examples of this intervisibility include Barnard Castle (the castle), Scargill Castle, Dalton Mill, Bowes Castle, Bowes Museum, and Raby Castle. In this respect, the relevant receptor is not simply the individual heritage asset in isolation, but the heritage character created by the relationship between asset, setting, outlook, and the wider moorland landscape.

One further aspect identified in the submissions is that some heritage significance is carried by historically meaningful routes and places whose value depends on continuity of use, setting, and local memory. This includes, for example, the Funeral Walk between Newsham and Barningham – used for transporting the deceased to the village church, St Michael's. The significance is not the same as an ordinary right of way, and it may be affected by the development site, access roads, and grid connection. The community evidence therefore suggests that heritage should not be treated only as a list of designated features, but as a receptor class whose significance depends on the contribution made by the moor to historic setting, cultural continuity, and landscape context.

3.5 Residential Character

The community submissions identified the importance of setting and amenity character to their residences and hospitality businesses. These include rural properties, local villages, or dwellings further afield that have direct or partial line of sight to the proposed development or may be affected by noise or other pathways. The receptors included residential use of gardens and external amenity areas, including day- and night-time enjoyment of views, peace and quiet, dark skies, and wildlife. 54 submissions identified this receptor – along with multi-pathway disturbance – as relevant to their ongoing health (both physical and mental). This is a contributory reason to them living in the area and suggests the residential experience is often one of psychological restoration through peace, escape, and a day-to-day lived benefit. It is not just a matter of the formal amenity or of visual or acoustic attributes.

The relevant receptor is the overall residential setting and external amenity together with nearby shared spaces valued for ambience and community use.¹⁴ Various pathways were identified that could impinge on that character, such as noise, shadow flicker, night-time aviation lighting, construction disturbance, and changes in landscape character associated with large-scale energy infrastructure. The combination tended to vary with location and distance from the proposed site.

For residential receptors, the noise assessment should not be limited to average figures or a simple distance radius. It should apply the real-world conditions identified in Section 3.2 to residential settings, including hot summer nights when windows are open, topography, non-prevailing wind propagation, temperature inversion, and the cumulative effects of multiple turbines.

A further matter for assessment is the impact of construction traffic on listed buildings and private houses, particularly in Newsham. This is especially relevant for older buildings very close to the proposed traffic route that are reported to have little or no modern foundations. This issue also needs to be drawn to the attention of Historic England in case it is missed by desk-based scoping.

3.6 Ecological Interdependence

Community submissions identified ecological sensitivity as a receptor class whose significance lies in the vulnerable and interconnected conditions on which various habitats and species depend, as well as the movement of birds across the moors. The submissions refer to the interdependence of peatland systems, blanket bog, sphagnum bog, wet heath, ponds, streams, breeding areas, and species-supporting habitat, together with ground-nesting birds, waders, raptors, bats, deer, insects, amphibians, and notable flora. Some submissions highlighted the centrality of the peat to the interdependent ecological conditions.

What is of most importance to this receptor is not the presence of any particular species, but the conditions and interdependence that sustain multiple species. The Tees-Swale and North Pennines landscape has seen substantial conservation effort to sustain an integrated environment capable of supporting populations of waders

¹⁴ Residential receptors were nominated in numerous locations. See Appendix I.

such as curlew, lapwing, redshank, and snipe. As a result, these have remained stable across the northern uplands of England despite national decline.¹⁵ Some members of the community also report observations of black grouse, which have been in steep decline elsewhere in Britain.¹⁶ Forestry England have identified the North Pennines and Yorkshire Dales — both lying very close to the proposed site — as two of the eight areas with the greatest ecological potential to contribute to Golden Eagle recovery in England.¹⁷ Wind farms formed part of the risk when identifying the best areas.

The interconnected locations in the submissions extended beyond the proposed site to include nearby conservation areas, sphagnum bogs, the Stang Road corridor, Newsham Tarn and other water-fed habitats around Newsham, Scargill, Helwith, and the wider Barnard Castle environs. Some submissions call specifically for survey work in relation to ponds, watercourses, bog habitats, and breeding or nesting areas, whilst taking account of the interdependence and sensitivity of the conditions on which they depend, both on the proposed site and the surrounding area. If the assessment examines only the proposed wind farm's impact on individual species, or individual functional categories, it will miss the impact on the interdependence that is also central to how multiple species can survive.

Attention was also drawn to various regional or national initiatives concerned with nature recovery, habitat restoration, biodiversity, and wild-landscape character.¹⁸ The EIA/ES needs to consider the impact of the development on such initiatives.

3.7 Agricultural and Land-Managed Use

Community submissions also identify agricultural and land-managed use as a distinct receptor class. This includes farms, grazing land, livestock areas,

¹⁵ <https://www.northpennines.org.uk/wp-content/uploads/2022/01/Tees-Swale-Programme-Project-Summaries.pdf>

¹⁶ One member of the community reported, during a 10-mile walk within the boundary of the proposed site, they observed 9 skylarks, 19 curlews, 46 lapwings, 4 mallards, 13 golden plovers, 7 greylag geese, many red grouse, 1 stonechat, 1 red kite, 1 black grouse, many starlings, 17 oystercatchers, 3 snipe, 1 kestrel, 7 fieldfares, and 1 common buzzard. Another reported counting 22 curlew flights in 24 minutes between Newsham and the proposed site.

¹⁷ <https://www.forestryengland.uk/nature-wildlife/golden-eagles>

¹⁸ Community feedback suggests many such schemes are supported by the Environment Agency.

gamekeeping land, and other managed rural land whose significance lies in practical use and management rather than in ecology or hydrology taken in the abstract.¹⁹ In some submissions the main question related to the reliability and quality of private or local water supplies; in others it is the possible effect of access changes, habitat disturbance, construction traffic, infrastructure corridors, or changes to land condition.

The submissions refer to sheep and cattle breeding and movement, livestock water points, pasture, access to fields, the operation of farm and estate land, gamekeeping, and conservation management. A number of these activities, and the locations in which they occur, also overlap with water dependence, heritage, or tourism, but the organising principle here is the continued practical use and management of rural land. The receptor is therefore the continuity of agricultural and land-managed use on the site and in the wider area. If the assessment treats water, access, habitat disturbance, traffic, and land condition as separate matters, it may miss the effect on farmers' and gamekeepers' ability to continue managing the land in practice.

Some community evidence also raised air-quality baseline issues associated with moorland burning or heather management, including whether the proposed development could alter the frequency or pattern of such burning and thereby affect particulate exposure.

3.8 Recreation and Destination Use

The community submissions identify the site, the surrounding area, and wider locations as receptors of recreation and destination use, rather than merely as a set of isolated rights-of-way or visitor assets. The submissions refer to walking, cycling, riding, open-access use, scenic climbing points, landscape photography, long-distance routes, and wider visitor draw. In many cases these are valued for the quality of the surrounding experience: openness, remoteness, dark skies,

¹⁹ The locations of submissions included Barningham, Dousgill, Helwith, Scargill, Spanham, Kexwith, and Marske.

archaeology, wildlife, and the sense of being in a relatively undeveloped upland landscape.

Locally, residents often use the pathways or bridleways crossing the site or nearby moors, such as Harker Moss – on the East side of which a former resident's ashes appear to be buried in an informal grave. A particular note was made of the potential road-safety interaction between cycling and increased construction/operational traffic.²⁰ Also, several submissions identified horse and rider safety, including potential behavioural responses to turbines, lighting, noise, and moving shadows, and the potential reduction in use of bridleway networks. A further potential danger for assessment is safety during high winds and/or icy conditions, such as the shedding of ice from turbine blades. Some submissions identified perceived safety and fear responses as access issues, acting as a deterrent to use the bridleways and open-access land.

Various hospitality businesses in the local and wider area depend in part on landscape character, tranquillity, habitat quality, conservation value, and rural road access. The impact assessment therefore needs to consider tourism and hospitality impacts within the local context, rather than relying only on national or regional research that may not capture displacement away from destinations where the landscape forms a significant part of the visitor draw.²¹ The assessment should also consider actual or perceived effects on guest confidence, insurability, and business viability.

This receptor class includes both ordinary local use and nationally significant routes or destinations. The submissions identify visibility of the site from various points along the Pennine Way and Coast to Coast National Trails, North Pennines National Landscape and UNESCO Geopark, Yorkshire Dales National Park, Nidderdale

²⁰ For example, Moor Lane – which runs from Helwith to Newsham – is a single track and has large downhill sections and blind bends down which cyclists often travel too quickly.

²¹ 82 submissions identified a potentially detrimental impact on tourism, due to the moor being a part of the attraction or the business' proximity to the moor. These submissions were not limited to the immediate area of the site but included: the town of Barnard Castle in County Durham; villages such as Buckden, Cray, Hubberholme, Starbotton, and Kettlewell in the Yorkshire Dales National Park; and some villages or parishes in Nidderdale and Wensleydale. Submissions also identified the need to include national tourist organisations – such as the Ramblers Association – to assess activities potentially moving to undeveloped landscapes.

National Landscape, and Teesdale.²² They also identify destinations and businesses whose appeal depends on these qualities, including Scargill Castle,²³ Helwith tea garden, Tan Hill Inn, rural holiday locations around the proposed site, and visitor-facing locations further afield, such as Barnard Castle and Reeth.

What matters here is the continued use and draw of the area as a place people travel through, visit, and value for a distinctive upland experience.

3.9 Rural Roads and Access Network

Community submissions identify the rural roads and access network serving villages, farms, and dispersed properties as a distinct receptor class whose significance lies in its vulnerability to construction and operational burden – especially when added to existing planned works such as the A66 dualling. The submissions refer repeatedly to narrow lanes, single-track roads, bridges,²⁴ verges, flood- and snow-prone routes, passing places, commuter access, and use by cyclists and horse-riders. The high number of accidents on the nearby A66 was also highlighted for cumulative assessment with increased construction and operational traffic for the site, access, and grid connection.

There are two key issues in this receptor class. One is the use of local roads for recreation or as amenity through walking, cycling, driving, or shared roadside community spaces. The other is dependence on a constrained transport network for everyday movement, agricultural operation, and access to homes and businesses. At present, the two mix satisfactorily, but can be strained when there is overspill from the A66 due to accidents.

Indicative examples in the submissions include roads through and connecting Barningham, Helwith, Newsham, Barnard Castle, the Stang Road corridor, Whipperdale Bank, Stang Lane, and other minor-road corridors that may be required to carry abnormal loads or heavy construction traffic. Several submissions refer to

²² A wide range of locations affected by the proposed site was identified – see Appendix H.

²³ Scargill Castle is a Grade II listed medieval castle, scheduled monument, and part holiday let with views of dark skies.

²⁴ Bridges were mentioned in some submissions because residents understood The Stang might be used as an access route. As Olsen's current chosen route does not use The Stang, bridge-related concerns are not carried forward in Section 4.

existing flooding, potholes, narrow geometry, weak verges, and already difficult passing conditions. Moor Lane (from the proposed site down to Newsham) is frequently flooded in various places causing large potholes to appear in the road. The potential for increased flooding to put some houses at risk was also flagged for assessment.

The receptor is the wider rural access network and the communities and hospitality businesses who depend upon it.

3.10 Operational Environment Uses

A smaller but distinct group of submissions identifies uses of the area that do not sit comfortably within the main receptors above, because their significance lies in the area functioning as an operational environment rather than simply as landscape, amenity, or recreation. These include military training land and RAF low-flying activity throughout the Tees valley. The assessment should examine possible effects on MOD-related operations such as telecoms, radar, and signal interference as well as potential knock-on effects if activity is displaced and causes greater disturbance to residents elsewhere.

Submissions also reported private helicopters and paramotors flying in the area. Other uses depend on open upland airspace, darkness, visibility, or the absence of large-scale vertical infrastructure, lighting, or other features affecting operational suitability. These include Feldom Range night training, which sometimes makes use of flares, and may therefore be affected by turbine night lighting in a way that desk-based scoping might not identify.

The significance of this receptor lies in the area's continuing suitability as a flexible, operational environment. If assessment is confined to separate topics such as aviation, lighting, noise, or military consultation, it may miss the effect on that operational environment itself and any indirect effect on residents arising from displaced activity.

3.11 Other Locally Identified Receptors

As explained in the introduction (Section 2), community submissions identified two kinds of receptor – individual receptors with one or two pathways, and integrated

receptors that emerge from the interaction of several pathways and receptor groups. Where individual receptors relate to an integrated receptor, they have been referred to in one of the above sections – either in the text or in a footnote. However, there are some submissions that identify locally significant receptors that do not fit neatly within the main classes above, but which should not be lost in a generic heading. This subsection documents other locally identified receptors that have not yet been referred to.

Newsham Village Green was highlighted as a particularly vulnerable area for potential accidents as it is a shared community space used by children and residents, for various informal and organised events. Examples include the annual carnival or playing football which, in the absence of pavements, can encroach on the road. The relevant pathway is the possible effect of construction traffic or increased volume of normal traffic, and the associated impact on safety and amenity – particularly for children playing on the green. Even if a new, alternative access route is to be built, the interim risks on Newsham Village Green need to be assessed.

The road through Newsham is crossed above lorry height by more than 30 telephone/broadband cables and some power cables, which are for residential and business purposes. Such telephony, internet, and electric mains services in Newsham need to be treated as a receptor, with particular attention on how they will be affected by oversized construction traffic.

Also, the impact on travellers who park on the verges at the Rokeby Inn/Smallways junction of the A66 needs to be assessed. This is an established stopping point, and the assessment may need to cover several issues, including safety, disturbance, and possible legal implications.

The status of the North Pennines National Landscape as a UNESCO Global Geopark was also highlighted. Its significance lies in the wider interpretive and educational value of the landscape, rather than in any single heritage, tourism, or ecological designation taken in isolation.

The submissions also identify some film and television locations, such as Healaugh Crag, where the value of the receptor lies in the open landscape as a cultural backdrop – e.g. for historical drama – rather than in standard amenity or route use alone.

Several submissions also highlighted that the site already acts as a significant carbon store, principally through the peat which covers much of the site and, as suggested by Natural England's 2025 peat map,²⁵ can be up to 5 m deep. These submissions identify a more general climate receptor, through the release of carbon due to the proposed development, access, and connection to the grid.

These receptors are not numerous, though this needs to be considered against the relatively low participation rate in the consultation due to the short timescales and limited official support. Important receptors may be overlooked if scoping fails to take advantage of local knowledge and the receiving environment is reduced to standard categories.

²⁵ See Appendix D.

4 Comparison with Scoping Request

Section 3 sets out various receptors and pathways raised in the scoping community consultation exercise. The present section compares those issues with Olsen's Scoping Request and identifies matters that appear to need explicit treatment in the Scoping Opinion. There are three main issues.

The first issue is that the Scoping Request's topic-led structure tends to fragment receptor-level effects. The issue is not whether such matters are mentioned somewhere under conventional topic headings – in many cases those headings are present, which underlines their potential relevance to likely significant effects. Rather, as a result of the fragmentation, the Scoping Request overlooks system-level effects or emergent properties that arise from the interactions between functional topics. Unless PINS requires explicit assessment of integrated receptors, those system-level effects may not be assessed. The suggestions within the Scoping Request to read related chapters simultaneously does not remove this issue. The integrated receptors need to be identified and properly assessed in their own right.

Secondly, there are some areas of detail or granularity that do not seem to be included in the Scoping Request. Whilst it is possible that such details may be covered in the final assessment, it is also possible they may be overlooked. There is no clear mechanism by which later public consultation will reliably recover those community-derived receptors and pathways that are missing at the scoping stage.

Thirdly, the geographical scope is sometimes limited on the basis of standard or common assumptions – for example, for private water supplies or listed buildings. Whilst common assumptions can be a starting point, they can have the effect of scoping out receptors that have the potential to be significantly affected. The geographical scope needs to take into account the unique circumstances of the proposed site and the wider area in which it is situated. A limited geographical scope may lead to an underestimate of the significance or magnitude of an impact, or a failure to implement appropriate monitoring, mitigation, or remedial measures should the development proceed.

Therefore, within this section, bullet points are provided that summarise the community feedback in Section 3. The numbers correspond to Section 3 – e.g. the

bullets under 4.1 relate to the narrative in 3.1 – which provides expanded descriptions. Those bullets are then rated according to whether they appear to be not identified (19), minimally covered (20), partly covered (29), or mostly covered (7) by the Scoping Request. There are also several more specific or qualified ratings where required by the nature of the issue.

For the avoidance of doubt, where this section states that assessment is “not clear” or similar, it refers to the lack of clarity in the Scoping Request about whether the matter will be considered in the ES; it does not imply uncertainty about the relevance, likelihood, or potential significance of the receptor or pathway identified by the community evidence.

Please note, this report has been prepared rapidly to assist the Scoping Opinion process within the available timescale. It is not a full audit or exhaustive verification of the Scoping Request but a comparison against the specific matters raised in the community consultation. In some cases, where community-supplied information seems to conflict with the Scoping Request or Olsen’s consultation materials, the matter has been checked and, if unresolved, flagged for clarification. Nevertheless, this report was not produced from an exhaustive verification exercise. Its primary purpose is to identify receptors, pathways, and assessment gaps that require explicit consideration at scoping.

4.1 Upland Water Interdependence

4.1.1 Integrated upland water system: assessment based on systemic interactions rather than only on separate hydrology, ecology, peat, drainage, water-quality, or land-use topics.

***Minimally covered:** Relevant topical headings are included in the Scoping Request, and the fact of some interrelationships between potential effects is acknowledged.²⁶ However, these interrelationships are addressed by suggesting the other topic chapters should be read in parallel. The Scoping Request does not identify what the interrelationships or systemic effects are,*

²⁶ Scoping Report, 9.1.3.

nor does it list the integrated upland water system as a receptor in its own right.

4.1.2 Peat as water store and receptor: assessment of peat, sphagnum, and associated habitats both as receptors that may be damaged and as water stores helping to regulate the upland water system, including possible effects on runoff, drainage patterns, water retention, water table, drought resilience, and flood risk.

***Partly covered:** Various aspects of peat are covered, but it is not clearly scoped as a key part of the integrated upland water system, acting as a water-storage receptor regulating runoff, water retention, water-table behaviour, drought resilience, and flood-risk mitigation within the wider upland system. See also the note under 4.12.1 on reconciling discrepancies between peat maps.*

4.1.3 Geographical scope: given the site's upland/headwater position, include all water sources and uses between the Tees and Swale that may be affected by changes to the upland water system.

***Partly covered:** The Scoping Request identifies the site plus 500 m, and a precautionary 2 km downstream. However, the proposed site is in an upland/headwater position of an integrated upland water system that feeds multiple private supplies through streams, springs, and boreholes at varying distances (see 4.1.5). The Scoping Opinion should include all potentially affected water supplies where quality or reliability might be altered by changes to this part of the integrated upland water system.*

The integrated water system of which the site occupies a headwater position also feeds the Tees and Swale.²⁷ Despite the distance of approximately 7 km, there may be consequences for the Swale/Ure/Ouse system and associated flood mitigation schemes related to York (see 4.1.9). The scope should include assessment of potential consequential effects for the Mid Swale project and other flood mitigation schemes.

²⁷ See Appendix K "Environment Agency Catchment Data Explorer" for stream connections between the proposed site and the Swale.

4.1.4 Water table: assessment of how it might change and impact private water supplies, ponds, streams, and habitats.

***Minimally covered:** Many hydrological topics are covered, but water-table change is not itself clearly scoped as a specific pathway affecting springs, boreholes, ponds, streams, and water-dependent habitats.*

4.1.5 Private water supplies: identification and assessment of all potentially affected springs, boreholes, streams, and other private water sources, including reliability, quality, dependence on the wider water system and water table, and effects on homes, farms, livestock, hospitality businesses, and other local uses.

***Partly covered:** The (non-comprehensive) community consultation included 38 reports of private water supplies, which are essential for domestic, animal, agricultural, hospitality, and food-production use. However, the Scoping Request indicates that private water sources will be investigated within a limited geographical scope. There is no clear commitment to identifying all potentially affected private water supplies whose quality or reliability might be altered by changes to the upland water system, given the site's headwater position. Also, the Scoping Request contains only a qualified commitment to 'avoid impacts on private water supply sources where possible'.²⁸*

The Scoping Opinion should therefore require explicit identification and assessment of all potentially affected private water sources, including their reliability, quality, hydrological dependence, and consequences for homes, farms, livestock, hospitality businesses, and other local uses. The ES should identify what measures would be required to maintain clean, reliable supplies to all essential water sources that may be affected by the development. This assessment should also include the consequences (including socio-economic, which Olsen propose to scope out) of supply disruption for domestic use, livestock, farm operations, hospitality premises, and other facilities dependent on private or local water sources.

²⁸ Volume B, Comm Hy-04, p. 3A-6, emphasis added.

Without such identification and assessment, a supply affected outside Olsen's proposed study area may have no agreed baseline, monitoring mechanism, trigger threshold, or clear route for remedial action if quality or reliability changes during or after construction.

4.1.6 Construction and operation effects on water supplies: including reliability and quality of private and mains water supplies and potential contamination from concrete or other substances.

***Partly covered:** Many of the relevant topics are covered in the Scoping Request. However, the assessment is not clearly framed around the reliability and quality of actual private and mains water supplies as essential receptors. There is no clear commitment to assess mains-water demand, source, pressure, and resilience, particularly in relation to any temporary concrete batching plant and its potential effects on local supplies such as Newsham, including consultation with the relevant water companies.*

4.1.7 Historic mines, shafts, and shake holes: assessment of whether historic workings, collapsed features, or associated drainage pathways could affect water quality, water table, or ground stability, including whether lead, cadmium, zinc, or other contaminants could be disturbed or mobilised into human and food-production water sources or downstream watercourses.

***Partly covered:** The Scoping Request identifies historic lead mining, with a ground stability risk and potential contaminants, but mainly in the context of geology and land contamination. It is not clearly framed as an integrated mine–water pathway potentially affecting water quality, water-table behaviour, and human or food-production water sources. Nor does it specifically identify the possible mobilisation of contaminants into downstream watercourses during or after construction as needing assessment.*

4.1.8 Blade erosion and water sensitivity: assessment of whether PFAS or other substances associated with blade erosion could enter human and food-production water sources.

***Not identified:** The Scoping Request includes general pollution-prevention and water-quality monitoring commitments, but I have not found any reference*

to PFAS, blade erosion, blade-derived contaminants, or assessment of whether substances released during operation could enter human or food-production water sources in this hydrologically sensitive upland setting. As discussed in 3.1 (footnote 11), I was unable to find any significant research that covers this specific point. Given the criticality of human and food-production water supplies, the Scoping Opinion should require evidence-based assessment rather than leaving this pathway outside the scope because published research appears limited.

4.1.9 Long-range downstream flood management: implications for the Swale, Ure, Ouse, and York system, including flood-management work such as the Mid Swale project, current river levels, and projected increases in future years due to climate change.

***Minimally covered:** The Scoping Request scopes in increased downstream flood risk during construction and states that the FRA will consider climate change. However, this appears to be framed mainly around local flood risk and limited downstream study distances. It does not clearly identify the longer-range flood-management pathway involving the Swale/Ure/Ouse/York system or flood-management schemes such as the Mid Swale project.*

4.2 Multi-Pathway Disturbance

4.2.1 Combined disturbance: assessment of combined burden on receptors exposed to multiple disturbance pathways together, rather than only separate treatment of noise, shadow flicker, dust, vibration, traffic, lighting, and construction effects.

***Not identified:** Relevant disturbance topics are included in the Scoping Request, but combined multi-pathway disturbance is not identified as an integrated receptor issue. The Scoping Request appears to treat noise, shadow flicker, dust, vibration, traffic, lighting, and construction effects mainly through separate topic assessments, rather than assessing the combined burden on receptors exposed to several pathways together.*

4.2.2 Construction and operational phases: assessment across both construction and operation, including how temporary construction effects may combine with longer-term operational disturbance.

***Partly covered:** The Scoping Request recognises construction, operation, maintenance, and decommissioning phases and assesses some effects by phase. However, it is not clear that the ES will assess how temporary construction disturbance may combine with longer-term operational disturbance as a cumulative burden on the same receptors across the project lifecycle.*

4.2.3 Grid connection and site access: inclusion of construction and operational disturbance associated with grid connection, power lines or pylons, site access, and any associated infrastructure.

***Minimally covered:** Site access and internal cabling are included in the Scoping Request, but off-site grid connection infrastructure, including any power lines or pylons, is not included for meaningful assessment at this stage. The Scoping Request therefore does not clearly include construction or operational disturbance from grid connection and associated infrastructure as part of the combined multi-pathway burden on affected receptors.*

4.2.4 Existing and future baseline disturbance: assessment of how project-related disturbance may add to existing or planned disturbance, including military activity, RAF low-flying, heather harvesting, tractor/lorry movements, A66 accident overspill, and A66 dualling works.

***Minimally covered:** The Scoping Request recognises some relevant baseline or future-baseline matters, including A66 works and military activity. However, these are not clearly assessed as existing or planned disturbance conditions affecting the same receptors. It is not clear that the ES will assess how project-related disturbance may add to or interact with existing disturbances as part of the combined multi-pathway burden.*

4.2.5 Temporary concrete batching plant: assessment of concrete dust, air pollution, noise, traffic, vibration, water demand, and other disturbance associated with any temporary on-site concrete batching plant.

Minimally covered: *The Scoping Request identifies that some associated effects of a temporary concrete batching plant would be assessed, particularly water abstraction and wastewater discharge. However, it is not clearly scoped as one of the contributors to combined disturbance in its own right, including concrete dust, air pollution, noise, traffic, vibration, water demand, and other effects on nearby receptors such as Newsham village.*

The ES should also justify whether any fixed air-quality study boundary, including the 250 m screening distance, is adequate in this exposed upland setting, where wind may carry dust towards sensitive human receptors beyond that distance.

4.2.6 Multiple turbines acting together: assessment of whether multiple turbines may combine to increase effects, including shadow flicker, noise aggregation, and noise propagation.

Partly covered: *The Scoping Request includes operational noise prediction for the proposed wind turbines, inter-project cumulative operational wind-turbine noise assessment, and shadow-flicker assessment. However, it is not clear that the ES will specifically assess whether multiple turbines within the Hope Moor array acting together may increase receptor-level effects, including shadow flicker from several turbines, combined noise from multiple turbines within the scheme, and noise propagation under conditions that increase audibility.*

Also, the 1.75 km scope for the assessment of shadow flicker is derived from what is “commonly considered”²⁹ to be the shadow reach from a single turbine. However, there is no calculation for the geographical reach of shadow flicker from multiple turbines aligning with the sun and the receptor. Olsen should justify whether the ten-rotor-diameter / 1.75 km study area is sufficient for a multi-turbine array, including whether cumulative or sequential shadow flicker from more than one turbine could affect receptors outside that distance.

²⁹ Scoping Report, 14.2.2.

4.2.7 Real-world noise and propagation conditions: assessment of noise across the Tees, Swale, and Arkengarth dales under real-world conditions and using the latest research, including topography, temperature inversion, night-time conditions, low background sound, and open-window conditions during warmer periods.

***Partly covered:** The Scoping Request includes baseline noise monitoring, daytime and night-time noise limits, recognised wind-farm noise guidance, predictive modelling, and a worst-case correction for concave topography. However, it is not clear whether the ES will rely mainly on averaged or standardised assumptions, or whether it will assess real-world variations in noise propagation across the Tees, Swale, and Arkengarth dales, including conditions that may increase audibility beyond standard assumptions.*

4.2.8 Specific noise characteristics: cumulative assessment of repetitive swishing or thumping, low-frequency sound, and sounds with a distinct pitch.

***Partly covered / partly scoped out:** The Scoping Request proposes to scope out infrasound, low-frequency noise, tonal noise, and excess amplitude modulation at the planning-stage assessment. It is not clear that the ES will use current evidence to assess specific noise characteristics relevant to receptor experience, or justify whether the scoped-out characteristics can safely be excluded in this location.*

4.2.9 Residential and wellbeing dimension: assessment of how multiple concurrent disturbances may affect residential amenity, sleep, tranquillity, stress sensitivity, and peace and quiet, without needing to assert a specific medical outcome.

***Partly covered:** The Scoping Request recognises some residential and wellbeing-related matters, including noise-sensitive receptors, stress or anxiety from construction disruption, and annoyance, sleeplessness, and stress associated with operational noise and shadow flicker. However, these matters appear to be divided between topic chapters. It is not clear that the ES will assess the residential and wellbeing burden of multiple concurrent disturbances.*

4.3 Immersive Landscape Experience

4.3.1 Whole landscape experience: assessment of the moor as an immersive landscape experience, rather than only as separate views, routes, noise, wildlife, dark skies, archaeology, or landscape-character topics.

***Not identified:** The Scoping Request includes multiple relevant assessments as separate topics. However, it does not identify the moor as an immersive whole-landscape experience whose value arises from the interaction of openness, remoteness, tranquillity, dark skies, wildlife, archaeology, and the absence of large-scale modern infrastructure.*

4.3.2 Restorative value and tranquillity: assessment of the value of the moor for psychological restoration due to the combination of its many natural aspects.

***Minimally covered:** The Scoping Request recognises relevant natural components of the moor but does not frame assessment around the moor's restorative value as experienced through its overall natural character (see also 4.5.4, footnote 32).*

4.3.3 Movement through the landscape: assessment of how residents, walkers, cyclists, horse riders, visitors, and other users experience the moor whilst moving through it, not only from fixed viewpoints.

***Partly covered:** The Scoping Request identifies routes and visual receptors, but assessment appears to be framed mainly around visual effects on routes and viewpoints, rather than the immersive experience of users moving through the moor.*

4.3.4 Dark skies and night-time experience: assessment of dark skies, stargazing, Milky Way visibility, Northern Lights observation, and the effect of turbine lighting on the night-time landscape experience.

***Partly covered:** The Scoping Request identifies visible aviation lighting, night-time visual effects, and effects on dark-sky designations. However, it does not clearly frame dark skies for assessment as a lived night-time landscape experience that contributes to tranquillity and residential amenity.*

4.3.5 Long views and surrounding protected landscapes: assessment of 360° views and the interrelationship between the proposed site and surrounding landscapes, including the Yorkshire Dales, North Pennines, Nidderdale, North York Moors, Teesdale, and views towards the North Sea.³⁰

***Mostly covered:** The Scoping Request includes a 45 km LVIA study area, ZTV mapping, landscape designations, landscape character assessment, and representative viewpoints. Community submissions identified a wide range of locations for assessment that may be affected by the proposed site, some of which are covered in the Scoping Request (see 4.12.3). The remaining gap is that the Scoping Request does not clearly frame assessment around the 360° views and the reciprocity and interrelationship between the proposed site and surrounding landscapes.*

4.4 Heritage Character

4.4.1 Heritage character beyond individual assets: assessment of the heritage character of the moor and its surroundings as a whole, shaped by assets, setting, intervisibility, cultural continuity, local memory, and the wider historic landscape, rather than only as a list of designated features.

***Mostly covered:** The Scoping Request includes designated and non-designated heritage assets, and takes account of setting impacts, cumulative impacts, historic land-use relationships, intervisibility, and communal value. This is an area, therefore, where Olsen largely recognises the relevant interactions. The remaining gaps are that heritage is subject to limiting geographical scope assumptions and it is still framed primarily through asset-led assessment rather than clearly identifying the heritage character of the moor itself as an integrated receptor.*

4.4.2 On-site and nearby heritage features in moorland context: assessment of historic routes, prehistoric landscape features, rock-art or carvings, burial features,

³⁰ See Appendix H for examples of landscape, recreation, and destination viewpoints identified through community submissions.

archaeological remains, prehistoric settlement and stone features, and how the moorland setting contributes to their significance.

***Mostly covered:** The Scoping Request identifies on-site and nearby heritage assets and proposes assessment of direct effects, setting, intervisibility, archaeological potential, and non-designated heritage value. The remaining gap is whether the assessment will give sufficient weight to how the moorland setting contributes to the significance of those heritage assets.*

4.4.3 Wider heritage setting and intervisibility: assessment of the proposed site as part of the landscape setting of heritage assets beyond it, including intervisibility with Barnard Castle, Scargill Castle, Dalton Mill, Bowes Castle, Bowes Museum, Raby Castle, and other relevant assets.³¹

***Mostly covered:** The Scoping Request includes assessment of wider heritage setting, intervisibility, predicted turbine visibility, distance, direction, and whether long-distance views contribute to the significance of heritage assets beyond the site. The remaining gap is whether the assessment will give sufficient weight to the collective heritage-character relationship between the moor and surroundings, rather than an asset-by-asset analysis.*

4.4.4 Historically meaningful routes and places: assessment of routes and places whose heritage value depends on continuity of use, setting, and local memory, including examples such as the Funeral Walk between Newsham and Barningham.

***Minimally covered:** The Scoping Request includes some route-related heritage assets, such as waymarkers and boundary features. However, it does not clearly identify historically meaningful routes whose heritage value depends on social and geographical continuity, such as the Funeral Walk between Newsham and Barningham.*

4.4.5 Access roads and grid connection: assessment of how new access roads, grid connection, and associated infrastructure may affect heritage setting, historic routes, archaeological features, and the wider historic landscape.

³¹ See Appendix I for examples of named heritage and archaeological places identified through community submissions.

Minimally covered: Whilst access roads are included in the Scoping Request, grid connection and associated infrastructure are not, and there is no obvious assessment of how these will collectively affect local and wider heritage assets and historic settings.

4.5 Residential Character

4.5.1 Overall residential setting: assessment of residential character as the combined experience of dwelling, setting, external amenity, outlook, peace and quiet, dark skies, wildlife, and rural character.

Not identified: The Scoping Request includes residentially relevant matters across separate topic chapters, but does not identify overall residential setting as an integrated receptor shaped by the combined experience. This identifies a locally evidenced pathway by which residents may be affected, notwithstanding Olsen's proposal to scope out socio-economic effects on the local population on the basis that no clear pathway has been identified.

4.5.2 Gardens, shared spaces, and external amenity: assessment of day- and night-time enjoyment of gardens, outdoor spaces, and nearby shared spaces valued for ambience and community use.

Minimally covered: The Scoping Request includes some relevant residential amenity, visual, noise, shadow-flicker, and lighting topics, but does not clearly assess gardens, outdoor domestic spaces, or nearby shared spaces as places whose day- and night-time use, ambience, and community value may be affected.

4.5.3 Residential restorative value: assessment of the residential environment as a source of peace, escape, psychological restoration, and day-to-day lived benefit, not only as visual or acoustic amenity.

Minimally covered: The Scoping Request recognises some related visual amenity, access, noise, shadow-flicker, and community-identity issues, but does not clearly assess the residential environment as a source of peace, escape, psychological restoration, and day-to-day lived benefit.

4.5.4 Human health: assessment of health sensitivity and wellbeing where community evidence identifies residential setting, sleep, stress sensitivity, and disturbance vulnerability as relevant to physical or mental health.

***Minimally covered:** The Scoping Request recognises some health-related determinants through separate topic chapters, but human health is scoped out as a separate assessment topic. This is an important receptor issue being fragmented across different chapters.*

Although individual health-related determinants can be assessed under separate technical headings, human health and wellbeing are emergent receptor-level outcomes that cannot be captured by assessing the separate aspects alone.³² A residential receptor might fall below the threshold for significant effect when each determinant is assessed separately, yet still experience a material health or wellbeing effect from the interaction of disturbance, sleep, stress sensitivity, residential setting, tranquillity, and loss of restorative environment.

Given that over 25% of responses identified health sensitivity as an issue, and the community evidence that health and wellbeing are among the reasons people live in the area, the ES should assess these matters as part of the residential receptor, without needing to assert a specific medical outcome.

4.5.5 Application of multi-pathway disturbance to homes: assessment of the residential effects of the pathways identified in 4.2, including how the combined effect varies by location, distance, exposure, and residential use.

***Partly covered:** The Scoping Request assesses several relevant pathways affecting residential or noise-sensitive receptors, including visual effects, noise, shadow flicker, lighting, traffic, and construction effects. However, it*

³² See, for example, Jimenez et al. (2021), *Associations between Nature Exposure and Health: A Review of the Evidence*, which reviews evidence linking nature exposure with cognitive function, blood pressure, mental health, physical activity, and sleep. This article is not suggested as evidence for or against the wind farm, but to support the point that human health and wellbeing can be affected by environmental conditions and should not be fragmented into discrete topics. Available online at: <https://pmc.ncbi.nlm.nih.gov/articles/PMC8125471/>

does not clearly apply the multi-pathway disturbance issue to homes as integrated residential receptors.

4.5.6 Older buildings close to construction traffic: assessment of construction-traffic effects on listed buildings and private houses, especially older buildings close to the proposed route that may have little or no modern foundations, including whether Historic England should be consulted.

***Minimally covered:** The Scoping Request includes construction traffic, route modifications, construction noise and vibration, and heritage assessment. However, it does not clearly assess the specific risk to older listed buildings and private houses close to the proposed construction route, including buildings with little or no modern foundations, nor the need to consult Historic England where local knowledge indicates potential vulnerability.*

4.6 Ecological Interdependence

4.6.1 Ecological conditions as a receptor: assessment of the vulnerable and interconnected conditions that sustain the ecosystem, rather than only separate assessment of individual habitats or species.

***Partly covered:** The Scoping Request includes ecology, ornithology, priority habitats, protected species, peatland ecology, and ecological receptors. It also recognises there are interrelationships with other functional topics. However, Olsen addresses this by stating that the ecology chapter “should be read alongside the following chapters”,³³ before listing hydrology, geology, ornithology, and climate change. The Scoping Request does not clearly identify the integrated receptor comprised of the interconnected ecological conditions and systemic effects that sustain the ecosystem and the habitats and species within it.*

4.6.2 Species, habitats, and movement: assessment of the ecological interdependence of ground-nesting birds, waders, raptors, bats, deer, insects,

³³ Scoping Report, 7.1.3.

amphibians, notable flora, and bird movement across the moors in relation to the habitats and conditions they depend on.

Partly covered / partly scoped out: *The Scoping Request includes ornithological survey work and refers to species, habitats, and ecological receptors. The assessment does not appear to adequately consider ecological interdependence and several bird species have been scoped out.*

However, the relationship between the different ornithological findings is not clear. For example, the Vantage Point (VP) survey observed 16 curlew flights³⁴ but elsewhere the Scoping Report notes the observation of flocks of curlew.³⁵ Community observations are more consistent with a higher level of curlew activity – e.g. see Section 3.6, footnote 16. Because curlew are a locally prominent and readily observed species, any material discrepancy between formal survey findings and local observations should be explained.

This may have implications for other bird species proposed to be scoped out. Until the apparent curlew discrepancy is explained, the Scoping Opinion should be cautious about accepting exclusions that rely on similar survey interpretation, especially where local observations, suitable habitat, or ecological connectivity provide a basis for questioning absence or low activity.

4.6.3 Wider ecological geography: assessment extending beyond the proposed site to connected conservation areas, sphagnum bogs, the Stang Road corridor, Newsham Tarn, water-fed habitats around Newsham, Scargill, Helwith, and the wider Barnard Castle environs.

Partly covered: *The Scoping Request's wider ecology study area appears to include most of the locations identified by community evidence. However, it is not clear that the assessment will treat them as part of a connected ecological geography, rather than as separate designated sites, habitats, species records, or survey areas.*

³⁴ Scoping Report, 8.3.26 (survey totalling 144 hours conducted between April 2022 and February 2024).

³⁵ 8.3.47.

4.6.4 Conservation and nature-recovery context: assessment of the relation between the proposed development and wider initiatives – current and emerging – to restore nature, habitats, biodiversity, and wild-landscape character across the north of England, including work in the Tees-Swale and North Pennines landscape and the potential contribution of nearby areas to Golden Eagle recovery.

***Partly covered:** The Scoping Request refers to Local Nature Recovery Strategies, biodiversity policy, ecological datasets, potential nature-recovery areas, and landowner biodiversity or environmental schemes. However, it is not clear that the ES will assess how the proposed development relates to wider conservation and nature-recovery trajectories across the Tees-Swale and North Pennines landscape.*

4.7 Agricultural and Land-Managed Use

4.7.1 Agricultural use and rural land management: assessment of the effect on farms, grazing land, crops, livestock areas, gamekeeping land, conservation-managed land, and other managed rural land.

***Not identified:** The Scoping Request includes relevant matters across separate topic chapters, including ecology, hydrology, access, traffic, peat, and land-use context. However, it does not identify an integrated receptor concerned with the practical continuity of use and management.*

4.7.2 Water, access, habitat, traffic, and land condition together: assessment of how water reliability, access changes, habitat disturbance, construction traffic, infrastructure corridors, and changes to land condition may combine to affect agriculture and land management in practice.

***Partly covered:** The Scoping Request includes several relevant topics but does not clearly assess how these pathways may combine to affect the practical, day-to-day management of agriculture and land.*

4.7.3 Farm-business and livestock management: assessment of effects on sheep and cattle breeding, livestock movement, livestock water points, pasture, field access, and other farm operations.

Minimally covered: The Scoping Request includes some relevant topics but does not clearly assess the practical and socio-economic impacts on farm operations. This assessment should include livestock welfare, business continuity, and effects on any associated farm-business facilities.

4.7.4 Gamekeeping and conservation management: assessment of effects on gamekeeping, estate management, conservation management, and the continuity of existing land-management practices.

Minimally covered: The Scoping Request includes some relevant ecology, habitat, land-use, access, and construction topics, but does not clearly assess effects on the practical continuity of gamekeeping, estate management, and conservation-management practices.

4.7.5 Moorland burning and heather management: assessment of air-quality baseline issues associated with moorland burning or heather management.

Minimally covered: The Scoping Request refers to heather, grouse-moor management, controlled burning, grazing, and particulate-matter standards in separate contexts. However, it does not clearly assess these practices as an air-quality baseline issue, or whether the proposed development could alter the frequency or pattern of burning and thereby affect particulate exposure.

4.8 Recreation and Destination Use

4.8.1 Recreation and destination use as a receptor: assessment of the site, surrounding area, and wider locations as places people travel through, visit, and value for recreation and destination use, not only as isolated rights-of-way or visitor assets.

Not identified: The Scoping Request includes relevant matters across separate topic chapters, including rights-of-way, visual receptors, tourism, and landscape/visual effects. However, it does not identify recreation and destination use as an integrated receptor concerned with how the site, surrounding area, and wider locations are travelled through, visited, and valued.

4.8.2 Local and long-distance recreational use: assessment of walking, cycling, open-access use, scenic climbing points, landscape photography, and long-distance routes.

Partly covered: The Scoping Request includes public rights of way (but see 4.12.2), National Cycle Routes, National Trails, long-distance walking routes, recreational visual receptors, tourism assets, and non-motorised road users. However, it is not clear that the assessment treats local and long-distance recreational use as a practical and experiential receptor rather than as separate access, visual, traffic, and tourism matters.

4.8.3 Bridleways, riding, and access deterrence: assessment of horse-and-rider behavioural responses to turbines, lighting, noise, moving shadows, and construction traffic.

Partly covered: The Scoping Request identifies PRowWs, non-motorised users, and bridleways. It is not clear that the ES will assess the various factors affecting horse-and-rider safety. Also, it is not clear whether the ES will assess the extent to which perceptions of safety could deter use of the moor and displace riders onto other routes.

4.8.4 High wind, ice, and blade-shedding safety: assessment of recreation and access safety during high winds and icy conditions, including the potential shedding of ice from turbine blades.

Partly covered: The Scoping Request identifies turbine safety measures for extreme weather, including high winds and icing. However, it is not clear that the ES will assess recreation and access safety for walkers, cyclists, horse riders, and other users during high-wind or icy conditions.

4.8.5 Tourism, hospitality, and local destination effects: assessment of local tourism and hospitality businesses whose visitor draw depends on landscape character, tranquillity, habitat quality, conservation value, rural access, and the distinctive upland experience, rather than relying only on national or regional research.

Partly covered: The Scoping Request proposes to scope out socio-economics and tourism, and address the subject in a standalone report, on

the basis that no clear pathway has been identified for significant adverse effects. However, the community evidence identifies plausible tourism and hospitality pathways that should be considered at scoping, especially where visitor draw depends on the combined qualities of landscape, tranquillity, conservation value, rural access, and distinctive upland experience.

It is not clear if Olsen's future report – whether in or out of the ES – will assess potential visitor displacement away from local tourism and hospitality businesses whose visitor draw depends on the combined qualities of the distinctive upland experience.

4.8.6 Guest confidence, insurability, and business viability: assessment of whether actual or perceived effects on landscape, access, tranquillity, or safety could affect hospitality or visitor-facing businesses.

***Minimally covered:** The Scoping Request identifies tourism as a topic to be covered in a separate report, but does not clearly assess effects on guest confidence, insurability, or the viability of hospitality or visitor-facing businesses.*

4.8.7 National trails and recognised destinations: assessment of effects on Pennine Way and Coast to Coast National Trail users, North Pennines National Landscape and UNESCO Geopark, Yorkshire Dales National Park, Nidderdale National Landscape, Teesdale, and individual locations such as Tan Hill Inn, Scargill Castle, Helwith tea garden, Barnard Castle, Reeth, and other relevant visitor destinations.³⁶

***Partly covered:** The Scoping Request identifies National Trails, long-distance routes, designated landscapes, recreational visual receptors, and tourism assets. However, it does not clearly assess the combined effect on recognised trails and visitor destinations as part of a connected recreation and destination network whose value depends on the wider upland experience.*

³⁶ See Appendix H for examples of wider landscape, recreation, and destination viewpoints identified through community submissions.

4.9 Rural Roads and Access Network

4.9.1 Rural access network as a receptor: assessment of the wider rural road and access network serving villages, farms, dispersed properties, businesses, and visitors, rather than only individual road links.

***Not identified:** The Scoping Request includes transport, access, construction traffic, abnormal loads, and road-user assessment, but does not identify the wider rural access network as an integrated receptor serving the area.*

4.9.2 Constrained/fragile road conditions: assessment of the network of narrow lanes, single-track roads, verges, passing places, flood- and snow-prone routes, potholes, weak edges, and difficult passing conditions.

***Partly covered:** The Scoping Request recognises some relevant constraints, including single-track roads, access to homes and farms, route configuration, route modifications, and passing places. However, it does not clearly assess the extent to which local road fragility may deteriorate under construction and access pressures.*

4.9.3 Abnormal construction, access, and grid traffic: assessment of abnormal loads, HGVs, construction traffic volume, and grid-connection traffic on the rural road network.

***Partly covered:** The Scoping Request includes construction traffic, operational access, abnormal loads, HGV movements, site access, and route modifications. However, grid-connection traffic is not included, omitting a potentially major infrastructure traffic pathway. Therefore, the overall burden on the rural road network is not clearly assessed.*

4.9.4 Cumulative pressure with A66 works and accidents: assessment of how project traffic may combine with A66 dualling works and overspill from A66 accidents.

***Partly covered:** The Scoping Request recognises the A66 dualling works as a relevant future-baseline issue. However, it does not clearly assess how project traffic may combine with A66 accident overspill and existing diversionary pressure on the rural road network.*

4.9.5 Mixed road use: assessment of effects on everyday access, commuting, agricultural movement, walking, cycling, horse-riding, driving, and shared roadside community use.

***Mostly covered:** The Scoping Request recognises relevant road-user groups and access functions, including non-motorised users, access to homes and farms, construction traffic, abnormal loads, and general road-user effects. The remaining issue is whether the interaction between different users on constrained rural roads is fully assessed.*

4.9.6 Flooding and road-related property risk: assessment of increased flooding or drainage changes on road conditions and nearby houses.

***Minimally covered:** The Scoping Request includes flood-risk, drainage, hydrology, access, and transport topics. However, it does not clearly assess whether increased flooding or drainage changes could worsen local road conditions or put nearby houses at risk as part of the rural access-network assessment.*

4.9.7 Routes that may be affected: assessment of potentially affected routes including Barningham, Helwith, Newsham, Barnard Castle, the Stang Road corridor, Whipperdale Bank, Stang Lane, Moor Lane, and other relevant minor-road corridors.

***Mostly covered:** The Scoping Request assesses selected access routes and key transport links. The remaining issue is whether all minor-road corridors and route examples have been considered where they may be affected by displacement, overspill, construction traffic, or associated infrastructure.*

4.10 Operational Environment Uses

4.10.1 Operational environment: assessment of the area as a flexible operational environment, not only as landscape, amenity, recreation, aviation, lighting, noise, or military activity.

***Not identified:** The Scoping Request includes relevant matters across separate topic chapters. However, it does not identify the area as a flexible operational environment whose suitability may depend on the combination of*

open upland airspace, darkness, visibility, and the absence of large-scale vertical infrastructure or intrusive lighting.

4.10.2 MOD and RAF activity: assessment of potential effects on military training land, RAF low-flying activity, telecoms, radar, signal interference, and related MOD operations.

***Mostly covered:** The Scoping Request identifies MOD and RAF matters, including RAF Leeming, military low-flying, Feldom Range, radar, telecommunications, and potential obstruction or signal-interference effects. The remaining gap is whether the assessment will capture locally observed operational use (vs desk-based scoping) and any knock-on disturbance or displacement effects of the development.*

4.10.3 Feldom Range night training: assessment of effects on night training, flare use, darkness, visibility, and the interaction with turbine lighting.

***Minimally covered:** The Scoping Request identifies Feldom Range and military low-flying/night low-flying context, but does not clearly assess Feldom Range night training, flare use, darkness, visibility, or the interaction with turbine lighting as a locally specific operational-use issue.*

4.10.4 Private helicopters and paramotors: assessment of locally reported helicopter and paramotor use.

***Not identified:** The Scoping Request includes aviation and safeguarding matters but does not identify locally reported private helicopter and paramotor use, or assess how such use may depend on open upland airspace, visibility, and the absence of large-scale vertical infrastructure.*

4.10.5 Displacement effects: assessment of whether affected operational activity could be displaced elsewhere and create indirect disturbance for residents.

***Not identified:** The Scoping Request does not clearly assess whether affected operational activity could be displaced elsewhere and create indirect disturbance for residents.*

4.11 Other Locally Identified Receptors

4.11.1 Newsham Village Green: assessment of construction-traffic and increased-traffic effects on Newsham Village Green as a shared community space used by children and residents, including interim risks before any alternative access route is available.

***Not identified:** The Scoping Request includes construction-traffic, access, and road-safety assessment, but does not identify Newsham Village Green as a shared community space whose use by children and residents may be affected by construction traffic or increased traffic, including interim risks before any alternative access route is available.*

4.11.2 Overhead services in Newsham: assessment of effects of oversized construction traffic on telephone, broadband, and power cables crossing the road through Newsham, and the residential and business services that depend on them.

***Not identified:** The Scoping Request includes construction-traffic, abnormal-load, access, and road-safety assessment, but does not identify overhead telephone, broadband, and power cables crossing the road through Newsham, or the residential and business services that depend on them, as receptors potentially affected by oversized construction traffic.*

4.11.3 Travellers at Rokeby Inn / Smallways junction: assessment of effects on the established stopping point at the Rokeby Inn / Smallways junction of the A66.

***Not identified:** The Scoping Request includes A66 access, construction-traffic, and road-safety assessment, but does not identify the established stopping point at the Rokeby Inn / Smallways junction as a locally specific receptor whose safety, disturbance, access, or legal implications may need assessment.*

4.11.4 UNESCO Global Geopark status: assessment of the North Pennines National Landscape as a UNESCO Global Geopark.

***Not identified:** The Scoping Request recognises the North Pennines in landscape, visual, heritage, tourism, and ecological contexts. However, it does not appear to identify the North Pennines National Landscape as a UNESCO*

Global Geopark, nor assess its wider interpretive and educational value rather than only separate landscape, heritage, tourism, or ecological effects.

4.11.5 Film and television landscape settings: assessment of locations such as Healaugh Crag where the open landscape has value as a cultural backdrop, including for historical drama.

***Not identified:** The Scoping Request recognises film and television locations only as a general regional tourism theme, but does not identify specific local landscape settings such as Healaugh Crag where the open landscape may have value as a cultural backdrop, including for historical drama.*

4.11.6 Peat and carbon storage: assessment of peat as a carbon store, including potential carbon release from the proposed development, access works, and grid connection.

***Partly covered:** The Scoping Request includes carbon and climate-change assessment and recognises that peat may act as a carbon store. Olsen provides an initial assessment suggesting that the moor may be a carbon emitter. However, that peat/carbon assessment cannot be relied upon until apparent discrepancies between the official Natural England peat mapping, Olsen's peat-depth mapping, and Olsen's habitat classification have been reconciled (see 4.12.1). It is also not clear that potential carbon release from access works and grid connection will be fully assessed.*

4.11.7 Other locally identified receptors: assessment of any remaining locally significant receptors not captured either by Olsen's standard categories or by the present non-comprehensive exercise. Public consultation should provide a clear opportunity to identify specific places, uses, or pathways of importance that may otherwise be overlooked.

***Not identified:** The Scoping Request uses standard topic headings and therefore may not identify locally specific receptors, uses, or pathways that do not fit neatly within those categories. Public community consultation should provide a clear opportunity to identify such receptors, which should then be checked against the ES scope so they are not lost under generic headings.*

The design of the first public consultation does not appear to facilitate such feedback.

4.12 Consequences of Narrow Scoping

If the Scoping Opinion reflects a narrow geographical scope, or a topic-by-topic approach, without requiring targeted assessment of the integrated receptors identified above, there may be several implications, ranging from an inadequate Environmental Impact Assessment to insufficient monitoring and mitigation should the development go ahead. For example, later community consultation should not be treated as a safeguard against omissions from scoping if that consultation is shaped by a relatively narrow set of assumptions and a design focus. In that situation, the community may not be given adequate opportunity to identify receptors and pathways missing from the assessment framework. Therefore, any significant omissions from the Scoping Opinion are less likely to be identified and corrected at a later stage.

Community feedback to the present author from the first consultation has already indicated possible consequences of narrow scoping, creating the risk of evidence and assessment gaps at later stages. The following list reflects the main issues raised and shows how a narrow scoping frame can affect the evidence available for the Environmental Impact Assessment.

4.12.1 Peat-map discrepancies: reconciliation of differences between Natural England's 2025 peat mapping, Olsen's peat-depth mapping, and Olsen's habitat classification, with a clear explanation of the peat baseline used for assessment.

***Unclear / possible discrepancy:** Natural England's mapping appears to show widespread peat of 30 cm and above across much of the relevant moorland area, and Olsen's habitat classification acknowledges extensive blanket bog habitat. However, Olsen's peat-depth mapping appears to show more extensive areas below 30 cm. The Scoping Opinion should require these apparent discrepancies to be reconciled, including any differences in peat definition, survey resolution, field-sampling method, remote-sensing method, classification threshold, management history, or mapping*

assumption, with a clear explanation of the peat baseline used for assessment and how it can be independently verified.

4.12.2 Public rights-of-way classification in consultation material: explanation of why community consultation material showed affected routes under a generic rights-of-way category, despite the legal and practical differences between footpaths, bridleways, restricted byways, and other route types.

Partly covered / consultation discrepancy: *The Scoping Request recognises distinctions between public rights-of-way categories, but the public consultation map appears to show routes under a generic rights-of-way category (see Appendix E). This distinction is important for community consultation because different route types involve different users, vulnerabilities, and impact pathways. For example, bridleways raise particular issues for horse-and-rider safety when using routes on the site as well as the surrounding rural road network, during construction and operation.*

The Scoping Opinion should seek an explanation of why undifferentiated route classifications were considered suitable for community consultation, given that different route types involve different users, vulnerabilities, and impact pathways.

4.12.3 Representative ZTV viewpoints: expansion of viewpoints to include local settlements, dispersed residential receptors, cultural sites, heritage viewpoints, national trails, and other locations for which the current list may not provide a properly representative viewpoint.

Partly covered: *The Scoping Request includes ZTV mapping and 18 representative viewpoints. However, the current viewpoint selection does not appear to include a sufficient range of local settlements, dispersed residential receptors, cultural sites, heritage viewpoints, national trails, and other community-identified locations needed to test whether the selected viewpoints are properly representative. For example, the largest settlement nearby (Newsham) has been excluded, as have other close hamlets such as Dalton, Gayles, and several others. Settlements and dispersed residential receptors are different from panoramic viewpoints in many ways, the former being part of everyday lived experience.*

Olsen's list does not include Great Whernside or Little Whernside, mountains that span the Yorkshire Dales National Park and Nidderdale National Landscape. As they are a major feature of the skyline when observed from the proposed site, to investigate the reverse perspective a line-of-sight analysis was undertaken which suggests that the full height of some turbines may be visible from certain points of Great and Little Whernside. They appear to represent a key receptor not necessarily captured by other viewpoints. Also, there are few viewpoints along the Pennine Way or Coast-to-Coast National Trails, whereas community feedback suggests the proposed turbines will likely be visible from many places along those paths.

Some viewpoints are included that do not seem to provide the most representative perspective. For example, the viewpoint selected in Barnard Castle is from the Cricket Ground, which is not the highest part of Barnard Castle, is surrounded by buildings in a dense residential area, and is on the opposite side of the town centre to the proposed site. Whilst the Cricket Ground is acceptable as a viewpoint, the character of the area is not fully representative. There are closer and potentially more sensitive locations that may need to be represented in the viewpoint selection, including heritage sites such as Barnard Castle (i.e. the castle itself), rather than relying on the Cricket Ground viewpoint to represent the town as a whole.

Also, a provisional community-generated ZTV analysis (see Appendix L), which broadly agrees with Olsen's mapping, makes the regional extent of theoretical visibility more apparent. Combined with the community observations concerning Great and Little Whernside and the locations listed in Appendix H, this reinforces the need to test whether the selected viewpoints adequately represent potential effects across protected landscapes, national trails, heritage/destination viewpoints, and long-distance recreational receptors.

The Scoping Opinion should require both a clear regional presentation of ZTV findings and more comprehensive coverage of potentially affected receptors in the selected viewpoints, including receptors beyond 20 km where ZTV or line-of-sight evidence indicates potential visibility.

4.12.4 Grid connection deferral: inclusion of grid connection effects in the ES where connection infrastructure is necessary for the wind farm to operate and may give rise to substantial environmental effects, rather than deferring those effects to a later process after the DCO decision.

***Minimally covered / inadequately deferred:** The Scoping Request acknowledges that grid connection is not included in the current application and will be promoted separately by a third party. However, as the Scoping Request also makes clear, grid connection is essential and may involve substantial environmental effects, potentially over a considerable distance.*

Olsen presents a legal argument for deferring consideration of those effects to a third party's application. That argument does not remove the scoping problem: Olsen accepts that the grid connection is functionally interdependent with the development and "capable of forming part of the Project for EIA purposes";³⁷ yet Olsen proposes that the decision-maker should determine the wind farm DCO without assessment of a necessary and potentially environmentally-significant infrastructure pathway.

If those effects are deferred until after the DCO, the ES may be incomplete because the decision-maker would not be assessing the likely environmental effects of the operational project as a whole. The Scoping Opinion should therefore require the ES to include grid connection effects, so far as they can reasonably be identified, where connection infrastructure is necessary for the wind farm to operate, even if the detailed route, method, or approval process has not yet been finalised.

4.12.5 Grid connection imagery: inclusion of a reasonable representation of grid connection impacts in the ES.

***Unclear representation / scoped out:** For example, Appendix F shows an image from Olsen's consultation document that defers grid connection to a later project, but also presents an image showing relatively small wooden poles when much larger pylons may be required. That is, the consultation*

³⁷ Appendix 2A, 1.6.1.

presents a visual representation of grid infrastructure whilst simultaneously deferring the actual route/method – which may or may not be different – to a later process. If what is presented to the community in the consultation is quite small, relatively unobtrusive, and of a scale commensurate with existing infrastructure, then the feedback is unlikely to identify the receptors and pathways that are relevant should the actual infrastructure be much bigger.

In the absence of knowing the method and route for the connection to the grid, the use of images such as these wooden poles may further weaken any later reliance on the consultation to correct earlier scoping errors or to act as evidence of community views. It suggests that Olsen’s consultation process may itself generate an incomplete understanding of what is being scoped.

4.12.6 Consultation limitations: consultation should not be assumed to cure omissions in the Scoping Request unless residents are given sufficient information and a clear opportunity to identify missing receptors, pathways, and mitigation questions relevant to the Environmental Statement.

***Not identified / scoping safeguard:** It should not be assumed that deficiencies in scoping can be corrected through later consultation unless that consultation is designed to elicit receptors and pathways based on local knowledge. Public-facing scoping methodologies, such as those described by the International Institute for Sustainable Development,³⁸ indicate the kind of open, evidence-gathering process that may be needed to identify locally understood receptors, uses, dependencies, and impact pathways.*

The Hope Moor consultation does not appear to have used that kind of open scoping methodology. The public questionnaire is framed primarily around project refinement and Olsen’s existing categories, rather than giving residents a fully open opportunity to identify what matters, why it matters, and how receptors may be affected. Community feedback also suggests that information about potential visual and noise effects, mitigation, and turbine

³⁸ See: <https://www.iisd.org/learning/eia/wp-content/uploads/2016/05/Public-participation.pdf>, pp. 1-2.

scale may not have been sufficient to enable informed identification of receptors, pathways, and mitigation questions. ³⁹

4.12.7 Pre-grid commissioning and temporary power: assessment of whether turbines could require temporary power generation, battery systems, diesel generators, or other auxiliary systems for commissioning, testing, safety systems, or operation before grid connection is available.

***Unclear / not identified:** The Scoping Request includes commissioning and testing, but it is not clear whether the ES will assess any temporary power arrangements that may be required if turbines are constructed or commissioned before grid connection is available. The Scoping Opinion should require clarification of whether temporary arrangements are likely to be required, for how long, and what the environmental impacts of such arrangements will be.*

4.12.8 Newsham Conservation Area: clarification of whether Newsham Conservation Area and associated heritage assets have been included in the cultural heritage baseline and assessed for relevant pathways, including setting, construction traffic, vibration, older buildings, residential character, and historic setting.

***Unclear / possible omission:** Newsham is a designated Conservation Area and appears to be within the relevant cultural heritage distance threshold. However, it does not appear to be listed in the cultural heritage appendices reviewed. The Scoping Opinion should require confirmation that Newsham Conservation Area and associated heritage assets have been included in the ES baseline and assessed for relevant pathways, including setting, construction traffic, vibration, older buildings, residential character, and historic setting.*

4.12.9 Long Green telecommunications mast: verification of the location and distance of the Long Green mast from the Scoping Boundary, and whether telecommunications effects can properly be scoped out.

³⁹ See Appendix J for an example of consultation imagery that community feedback considered to underrepresent turbine scale.

Unclear / possible discrepancy: *The Scoping Request identifies the Long Green telecommunications mast but states that it is approximately 1.4 km east of the Scoping Boundary. Local checking – using both Google satellite view measurement and direct observation – indicates that the mast is approximately 75 m from the Scoping Boundary. The Scoping Opinion should require verification of the mast location, distance from the Scoping Boundary, associated links, and whether mobile coverage to the intended service area may be affected.*

4.12.10 Effect of fixed scoping boundaries on magnitude and significance:

assessment boundaries should not be applied in a way that excludes receptors whose omission may reduce the apparent magnitude or significance of effects.

Scoping risk: *Several topic areas appear to rely on fixed geographical or category-based boundaries when determining what is scoped in or out, including heritage assets, private water supplies, shadow flicker, air quality, and other receptors. Standard screening boundaries may be appropriate starting points, but they should not become conclusive exclusions where site-specific evidence – including evidence provided through community input – indicates a plausible pathway beyond them.*

The risk is not only that individual receptors may be missed. It is also that the apparent magnitude and significance of impacts may be understated if the assessment excludes relevant receptors, pathways, interrelationships, or baseline conditions. Where affected receptors are omitted or scoped out, monitoring, mitigation, trigger thresholds, and remedial responsibilities may also be absent. The Scoping Opinion should therefore require Olsen to justify fixed-distance or category-based exclusions where community evidence or site-specific conditions indicate that affected receptors may fall outside the proposed scope.

4.12.11 Evidential basis for scoping out: transparent justification of effects that are judged unlikely, negligible, not anticipated, or adequately controlled by embedded mitigation.

Not identified / scoping risk: *Professional judgement is inevitable in environmental assessment. However, where it is used to exclude species,*

receptors, pathways, or other matters from detailed ES assessment, the Scoping Opinion should require the evidential basis for those exclusions to be made explicit. This should include the assumptions made, survey limitations, local records considered, embedded mitigation relied upon, and any consultee or stakeholder input, so that scoping-out decisions can be scrutinised by PINS, consultees, and affected communities.

Conclusion

The above discrepancies became apparent as a result of the comparison of the information provided by Olsen during their first community consultation and Scoping Request with supplementary information provided to the author by the community during this independent scoping consultation exercise. There has not been sufficient time to review the full Scoping Request technical information for consistency with community knowledge. This section should therefore not be viewed as a comprehensive list of discrepancies.

For PINS, the significance of these discrepancies is that they call into question whether the consultation process can generate the local evidence needed to support a complete and reliable EIA, so consultation should not be assumed to cure omissions in the Scoping Request. If the Scoping Opinion reflects the same narrow, functionally oriented frame as presented in Olsen's Scoping Request and stage one consultation materials, important receptors and pathways may remain outside the assessment and not be corrected through community feedback even though consultation has taken place. The community evidence in this report is submitted so that as many of those receptors as possible can be included at the scoping stage, before the assessment frame becomes difficult to correct.

Appendix A – Methodology

Most of the information for this community consultation was gathered during March and April 2026. The methodology used was:

1. An online questionnaire was created to capture receptors and pathways.⁴⁰
2. A short, explanatory video was produced, which also provided the link to the questionnaire.⁴¹
3. The video was publicised by a local county councillor, two local parish councils, and the Hope Moor Wind Farm Action Group.
4. Submissions were closed on 19th May 2026 in anticipation of the Scoping Request being due for publication.
5. The data was downloaded (235 submissions).
6. The data was cleansed, including:
 - the removal of incomplete or duplicate entries (33);
 - receptor descriptions were edited to remove language that expressed support for the wind farm (1) or objection to it (77).
7. Statistical factor analysis and AI-assisted thematic analysis were used to identify recurring themes.
8. The themes identified through the analyses were reviewed alongside the individual submissions and relevant public documents, maps, consultation materials, and Olsen documentation to structure Sections 1 to 3 of this report.⁴²
9. The results were compared with the Scoping Request to identify differences, with AI assistance to analyse Olsen's documentation.
10. The results of the comparison were used to write Section 4, after which the report was reviewed and finalised.

⁴⁰ <https://myers.co/hopemoor>

⁴¹ <https://myers.co/receptorvideo>

⁴² The detail of specific house and farm names is not included in the report for two reasons. Firstly, it avoids giving the false impression that this consultation was a comprehensive exercise. Less than 4% of residents in the 10 local parishes included in Olsen's liaison group answered the questionnaire. Secondly, a small minority of respondents expressed privacy concerns, including some who expressed concern about landlords becoming aware of their participation. Presenting area level information preserves privacy whilst still identifying the receptor classes and locations relevant to scoping.

Appendix B – Example effects of interactive receptor omissions

This appendix shows, for each receptor class, a practical type of effect that may be missed, split up, or understated if assessment is confined to separate functional topics – such as hydrology, noise, ecology, landscape, transport, or tourism – or locally identified receptors are not included. The practical omission can occur in three ways: a receptor is not identified at all; it is identified only in generic form without regard to location, use, or setting; or it is split across separate chapters so that no chapter assesses the actual integrated effect or local impact. This means that an Environmental Statement can appear to have covered all the topics whilst still being substantively incomplete.

Receptor	Organising principle	Example of what may be missed/misrepresented
3.1 Upland Water Interdependence	Dependence on an integrated upland hydrological system that affects, and is affected by, multiple receptors.	A private spring may remain technically present but become less reliable because peat disturbance, altered drainage, runoff, water-table change, and contamination pathways interact across the whole system. The Dousgill example captures this clearly: a spring that has dried up only twice in four decades may still suffer a significant effect if the reliability of supply changes, even if functional assessments of hydrology, peat, and water quality identify no separate impacts.
3.2 Multi-Pathway Disturbance	Exposure of the same receptors to multiple concurrent pathways whose combined burden may not be captured if assessed separately.	A dwelling may sit within individually acceptable ranges for noise, shadow flicker, lighting, dust, and traffic, yet still experience a qualitatively different burden because those disturbances occur together, and in some cases interact with an already intermittent baseline of military disturbance. A functional approach could record each pathway separately and miss the cumulative lived effect.

Receptor	Organising principle	Example of what may be missed/misrepresented
3.3 Immersive Landscape Experience	The moor as a whole landscape experienced through openness, remoteness, tranquillity, dark skies, nature, and cultural depth.	A walker or resident may lose the combined restorative experience of the upland environment. If landscape, lighting, noise, archaeology, and ecology are each assessed in their own chapter, the Environmental Statement may never assess the change or reduction in the immersive experience as such.
3.4 Heritage Character	Heritage significance shaped by setting, intervisibility, and the wider historic landscape of the moor.	The effect on a heritage receptor may not be physical damage to a monument, but loss of significance because the open moor no longer contributes to the asset's setting or to its relationship with other heritage features. The Funeral Walk is an example: its significance is not simply one of path use, and could be missed if treated only as access, recreation, or transport.
3.5 Residential Character	The dwelling together with its wider setting, external amenity, outlook, and day- and night-time environmental conditions.	A residential property may experience a combined effect on external amenity and ordinary domestic life through night lighting, flicker, episodic noise under real conditions such as open windows, topography, temperature inversion, or the introduction of large-scale energy infrastructure into the visual setting. A functional approach may note each pathway separately but still fail to assess the effect on the residential setting as it is actually lived.
3.6 Ecological Interdependence	Habitats and species whose significance depends on vulnerable ecological conditions, including disturbance regime, hydrology, darkness, and landscape context.	The impact on the ecosystem may not be adequately assessed if ecology is treated in a compartmentalised way, such as considering species separately from habitat or hydrology. The real effect may lie in deterioration of the conditions that support breeding, feeding, and movement across the moor, so that no single chapter captures the deterioration of the ecosystem on which those species depend.

Receptor	Organising principle	Example of what may be missed/misrepresented
3.7 Agricultural and Land-Managed Use	Practical use and management of land for farming, grazing, livestock, and conservation management.	A rural holding might not suffer one single neat impact, but a combined effect on continuity and viability. A functional approach may split these matters across roads, ecology, and hydrology and never assess the operational or socio-economic effect on the holding as a managed unit.
3.8 Recreation and Destination Use	The area as used and valued for walking, cycling, riding, visiting, and visitor-dependent use.	A hospitality business or recreation route might be affected by the combination of several factors. The practical effect may be reduced visitor draw because tranquillity, habitat interest, dark skies, conservation value, and access reliability are all affected together. If those matters are assessed under separate functional headings, the effect on destination use can be missed or understated.
3.9 Rural Roads and Access Network	Dependence on a constrained rural transport network whose significance arises from its vulnerability to construction and operational burden.	A road may remain technically open yet become less usable because flooding, potholes, narrow passages, abnormal loads, cyclist and horse-rider conflict, and village access pressures interact. If transport is treated only through traffic volume, routing, or capacity, the Environmental Statement may miss the actual burden on the rural access network.
3.10 Operational Environment Uses	Specialised uses of the area that depend on open upland airspace, darkness, visibility, and the absence of large-scale vertical infrastructure or intrusive lighting.	This may not involve a simple aviation or Ministry of Defence issue in isolation, but rather a potential effect on the area's continuing suitability for activities that depend on its combined attributes. If assessment is confined to separate topics such as aviation, lighting, noise, or military consultation, or relies mainly on desk-based scoping, it may miss locally observed uses such as flare-based night training, paramotors, as well as any indirect effect on residents arising from displaced activity.

Receptor	Organising principle	Example of what may be missed/misrepresented
3.11 Other Locally Identified Receptors	Recurrent local receptors that do not fit neatly within the main classes but are still sufficiently specific to require identification.	Newsham Village Green is an example of the issue not being road traffic in general, but the effect of construction traffic on a specific shared community space used by children and residents. A standard transport chapter might never identify that receptor at all. Similarly, the contribution of the landscape to UNESCO Geopark status may disappear if reduced to heritage, tourism, and ecology separately.

NB: The examples are illustrative rather than exhaustive. Their purpose is to demonstrate how an Environmental Statement may appear topic-complete whilst still omitting or obscuring the actual integrated effect on a receptor identified by the community consultation.

Appendix C – Artificial intelligence statement

Artificial Intelligence (AI) tools were used to assist in the preparation of this report in the following ways:

- preliminary topical research support;
- helping to design and implement the online receptor video and questionnaire;
- initial textual analysis and thematic sorting of community submissions;
- removal of support or objection language from community submissions;
- general editorial support, critique, and checking of clarity; and
- assistance in analysing and summarising Olsen's Scoping Request.

Although community submissions were analysed thematically with AI assistance, all submissions were read individually, themes explored using other techniques (e.g. factor analysis), the Scoping Request read independently, and the final decisions on themes, categories, and pathways were made by the author.

The purpose, structure, judgments, interpretation of community evidence, selection of material, and final wording are the responsibility of the report author. Any AI-assisted wording used in the report was reviewed, checked, and edited before inclusion.

Appendix D – Peat map comparisons

Natural England peat-depth / peat extent mapping (2025)

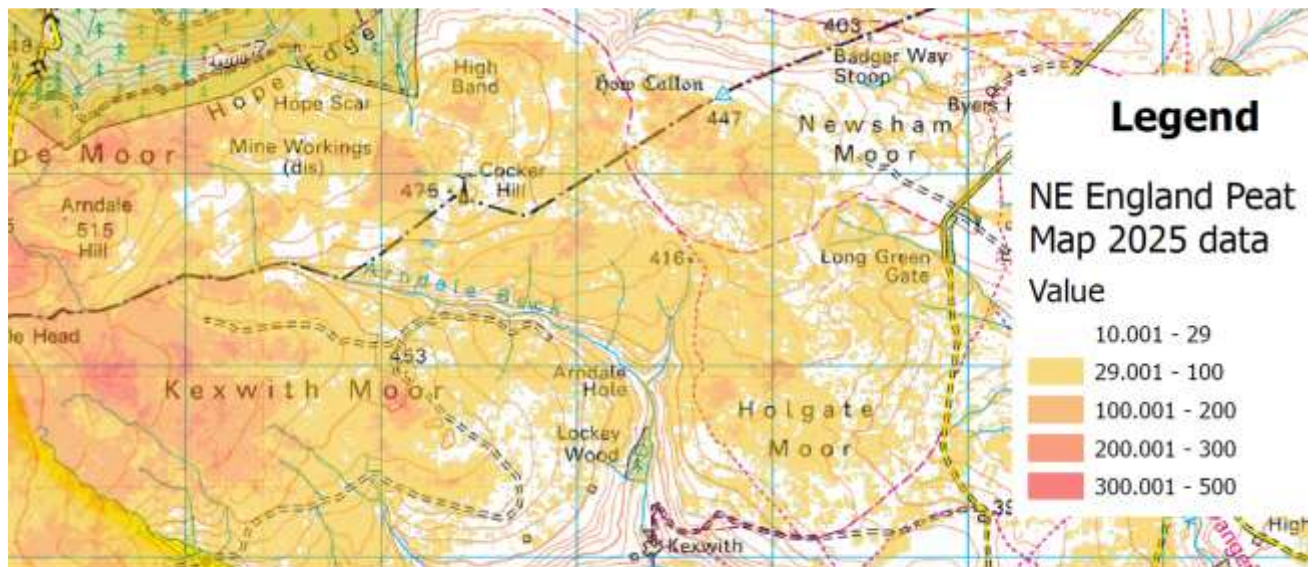
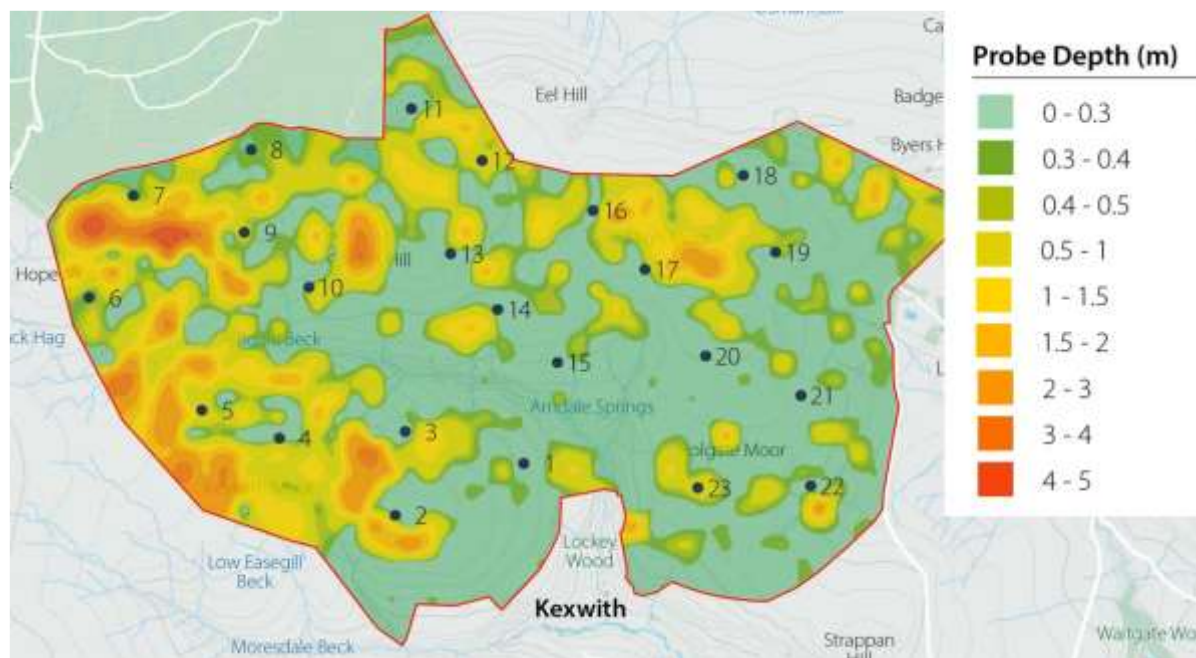


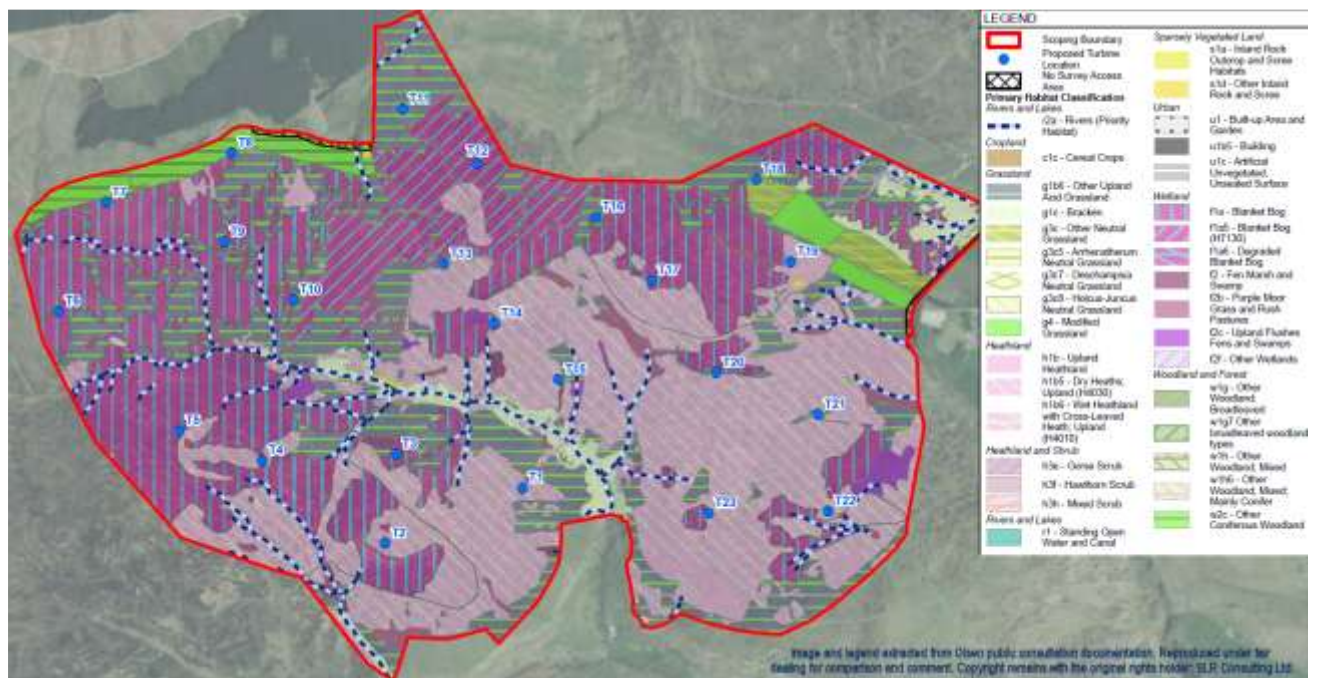
Image and legend reproduced for comparison and comment from community-supplied Natural England documentation. Copyright remains with the original rights holder.

Olsen Scoping Request peat-depth mapping (2026)



Source: Olsen public consultation: https://www.datocms-assets.com/197579/1778510450-15111-for-hm-digital_peat_depth_map.webp. (Linked to from <https://hopemoor.co.uk/documents/>). "Stage 1 Maps – May 2026" > "Peat depth map". Also found in the Scoping Request as Figure 10.1. Reproduced for comparison and comment. Copyright remains with the original rights holder.

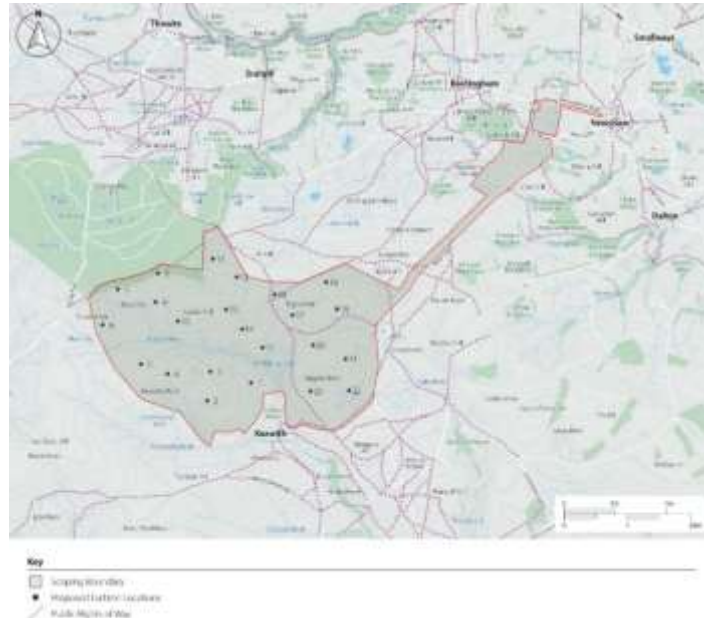
Olsen UKHab / habitat classification (2026)



Source: Olsen public consultation: <https://www.datocms-assets.com/197579/1778875805-414-063912-00001-0065-1habitats.pdf> (linked to from <https://hopemoor.co.uk/documents/>). "Technical maps – May 2026" > "UK Habitats Classification map". Reproduced for comparison and comment. Copyright remains with the original rights holder.

Appendix E – Route classification comparisons

Olsen Rights-of-way Map



Source: Olsen public consultation material: https://www.datocms-assets.com/197579/1778510477-15111-for-hm-digital_public_row_map.webp (linked to from <https://hopemoor.co.uk/documents/>). “Stage 1 Maps – May 2026” > “Public rights of way map”. Reproduced for comparison and comment. Copyright remains with the original rights holder.

Ordnance Survey route classifications



Source: <https://explore.osmaps.com/>. Map reproduced under fair dealing for purposes of comparison and comment. Copyright remains the property of Ordnance Survey (OS). OS is not the legal source of rights-of-way status, but maps have been cross-checked with local highway authorities' online maps and there is broad agreement as to the location of relevant bridleways.

Appendix F – Grid connection image



Grid connection

Connecting to the grid

Recent changes to grid connection processes across the UK mean that the grid connection point will not be confirmed until later in the development timeline. As a result, the grid connection route and method do not form part of this application and will instead be progressed through a separate application.

We will share further information as it becomes available.

Source: <https://www.datocms-assets.com/197579/1777493904-con-1-consultation-document.pdf> (Linked to from: <https://hopemoor.co.uk/documents/>). "Stage 1 Consultation Documents – May 2026" > "Consultation Document". Extract reproduced for comparison and comment. Copyright remains with the original rights holder.

Appendix G – Numerical summary of community data

This appendix summarises the final cleaned dataset from the Hope Moor Wind Farm receptor-identification questionnaire. The dataset contains 202 submissions.

Percentages are calculated as a share of the 202 submissions.

For receptor types and impact pathways, respondents could tick more than one option, so totals in those tables do not add to 202.

G1. Privacy and optional contact fields

Field	Count	Percent
I have privacy/safety concerns about being identified	6	3.0%
I am a tenant and do not want my landlord to identify me	2	1.0%
Name provided	23	11.4%
Email provided	23	11.4%
Phone number provided	19	9.4%
Preferred contact method stated	5	2.5%

G2. Location, relationship to place, and water supply

Field	Count	Percent
Nearest postcode or what three words provided	202	100.0%
Description or nearest place / landmark provided	160	79.2%
Private water supply – yes	38	18.8%
Private water supply – no	88	43.6%
Private water supply – unsure	13	6.4%
Private water supply – not answered	63	31.2%
Short factual description provided	202	100.0%

G3. "This relates to" (single choice)

Response option	Count	Percent
Home	68	33.7%
Business	12	5.9%
Community asset	32	15.8%
Place used regularly	82	40.6%
Managed property or land	8	4.0%

G4. Receptor type (multiple choice)

Response option	Count	Percent
Residential dwelling(s)	82	40.6%
Individual human receptor (health sensitivity)	54	26.7%
Public right of way / bridleway / open access users	108	53.5%
School / childcare / care home / medical facility	5	2.5%
Heritage asset (listed / scheduled / conservation area)	97	48.0%
Landscape viewpoint / valued view / recreation viewpoint	133	65.8%
Ecology / habitat (e.g., peatland, moorland, watercourse corridor)	81	40.1%
Water environment (stream/river/wetland/spring/groundwater/private supply)	67	33.2%
Farm / agricultural holding	39	19.3%
Tourism / hospitality business or attraction	82	40.6%
Transport route / junction / road safety location	46	22.8%
Other receptor type selected	21	10.4%
'Other' receptor description provided	28	13.9%

G5. Impact pathway (multiple choice)

Response option	Count	Percent
Visual / landscape character	166	82.2%
Noise	118	58.4%
Shadow flicker	71	35.1%
Aviation/lighting/night-time effects (incl. dark skies)	121	59.9%
Traffic and transport (HGVs, road safety, severance)	106	52.5%
Hydrology / water quality (including downstream concerns)	82	40.6%
Peat disturbance / carbon / land instability	88	43.6%
Ecology (species disturbance, habitat loss/fragmentation)	93	46.0%
Construction impacts (dust, vibration)	106	52.5%
Cumulative effects (with other schemes)	61	30.2%
Other impact pathway selected	15	7.4%
'Other' pathway description provided	14	6.9%

G6. Editing of support or objection language

Field	Count	Percent
Receptor descriptions edited to remove language expressing support for the wind farm	1	0.5%
Receptor descriptions edited to remove language expressing objection to the wind farm	77	38.1%

Appendix H – Landscape / recreation / destination viewpoints

<i>Black Hill (Ivelet)</i>	<i>Harter Fell</i>	<i>Peat Moor Hill</i>
<i>Booze (Arkengarthdale)</i>	<i>Height of Hazely</i>	<i>Penhill</i>
<i>Bouldershaw Moor</i>	<i>Helvellyn</i>	<i>Pen-y-Ghent</i>
<i>Buckden Pike</i>	<i>Holgate How</i>	<i>Pickerstone Ridge</i>
<i>Calver Hill</i>	<i>Holgate Pasture</i>	<i>Rogan's Seat (Keld)</i>
<i>CB Yard</i>	<i>How Tallon</i>	<i>Rokeby Inn</i>
<i>Cotherstone Moor</i>	<i>Hurst Moor</i>	<i>Romaldkirk Moor</i>
<i>Cross Fell</i>	<i>Ingleborough</i>	<i>Skiddaw</i>
<i>Dodd Fell</i>	<i>Lake District summits</i>	<i>Slei Gill / Sleigill</i>
<i>Downholme</i>	<i>including Scafell Pike</i>	<i>Tallon How</i>
<i>East Grain Moor</i>	<i>Little Whernside</i>	<i>Tan Hill</i>
<i>Fore Gill</i>	<i>Lovely Seat (Hawes)</i>	<i>The Fleak summits</i>
<i>Fountains Fell</i>	<i>Marrick</i>	<i>The Stang Road area</i>
<i>Fremington Edge</i>	<i>Melbecks Moor</i>	<i>Thorn Hill</i>
<i>Great Pinseat</i>	<i>Middleham Low Moor</i>	<i>Upper Wharfedale</i>
<i>Great Shunner Fell</i>	<i>Middleton-in-Teesdale</i>	<i>Whipperdale Bank</i>
<i>Great Whernside</i>	<i>Newbiggin</i>	<i>Windegg</i>
<i>Harkerside</i>	<i>Nine Standards Rigg</i>	

Appendix I – Other named places

A large number of archaeological and heritage sites were identified that may be affected by the proposed development. Most of these are visible by zooming in at the Historic England map search at <https://historicengland.org.uk/listing/the-list/map-search/>. Some examples (not comprehensive) of the places identified include:

<i>Badger Way Stoop</i>	<i>Boundary Stone 550</i>	<i>Dalton Conservation Area</i>
<i>Barningham Conservation Area</i>	<i>metres north of Byers Hill</i>	<i>Holy Trinity Church, Wensley</i>
<i>Bolton Castle</i>	<i>Bowes Museum</i>	<i>Raby Castle</i>

Various residential locations were identified. Specific house or farm names have been removed for privacy reasons (see footnote to Appendix A). Areas mentioned include:

<i>Arkengarthdale</i>	<i>Greta Bridge</i>	<i>Scargill</i>
<i>Barnard Castle</i>	<i>Helwith</i>	<i>Smallways</i>
<i>Barningham</i>	<i>Hope</i>	<i>Spanham</i>
<i>Brignall</i>	<i>Hutton Magna</i>	<i>Tees Valley</i>
<i>Bushy Park</i>	<i>Kexwith/Holgate Moors</i>	<i>The Stang</i>
<i>Crackpot/Whitside</i>	<i>Kirby Hill</i>	<i>Thwaite</i>
<i>Dalton</i>	<i>Langthwaite</i>	<i>Westwick</i>
<i>Dousgill</i>	<i>Marske</i>	<i>Whashton</i>
<i>Gayles</i>	<i>Newsham</i>	<i>Whaw</i>
<i>Greta</i>	<i>Ravensworth</i>	

Appendix J – Wind farm image

Some community feedback indicated that the image below does not provide a sufficient basis for understanding the size and scale of 200m turbines.



Source: <https://www.datocms-assets.com/197579/1777493932-con-1-strategy-doc.pdf>, p.1.

Extract reproduced for comparison and comment. Copyright remains with the original rights holder.

Appendix K – Mining and water maps

Northern Mines Research Society (map of mineral mines)



<https://nmrs.org.uk/mines-map/metal/non-ferrous-mines-of-the-british-isles/non-ferrous-mines-england-2d-mapping/>

Ordnance Survey (map showing additional mines, shafts, and shake holes on site)



Source: <https://explore.osmaps.com>. Extract reproduced for comparison and comment. Copyright remains with the original rights holder.

Environment Agency Catchment Data Explorer

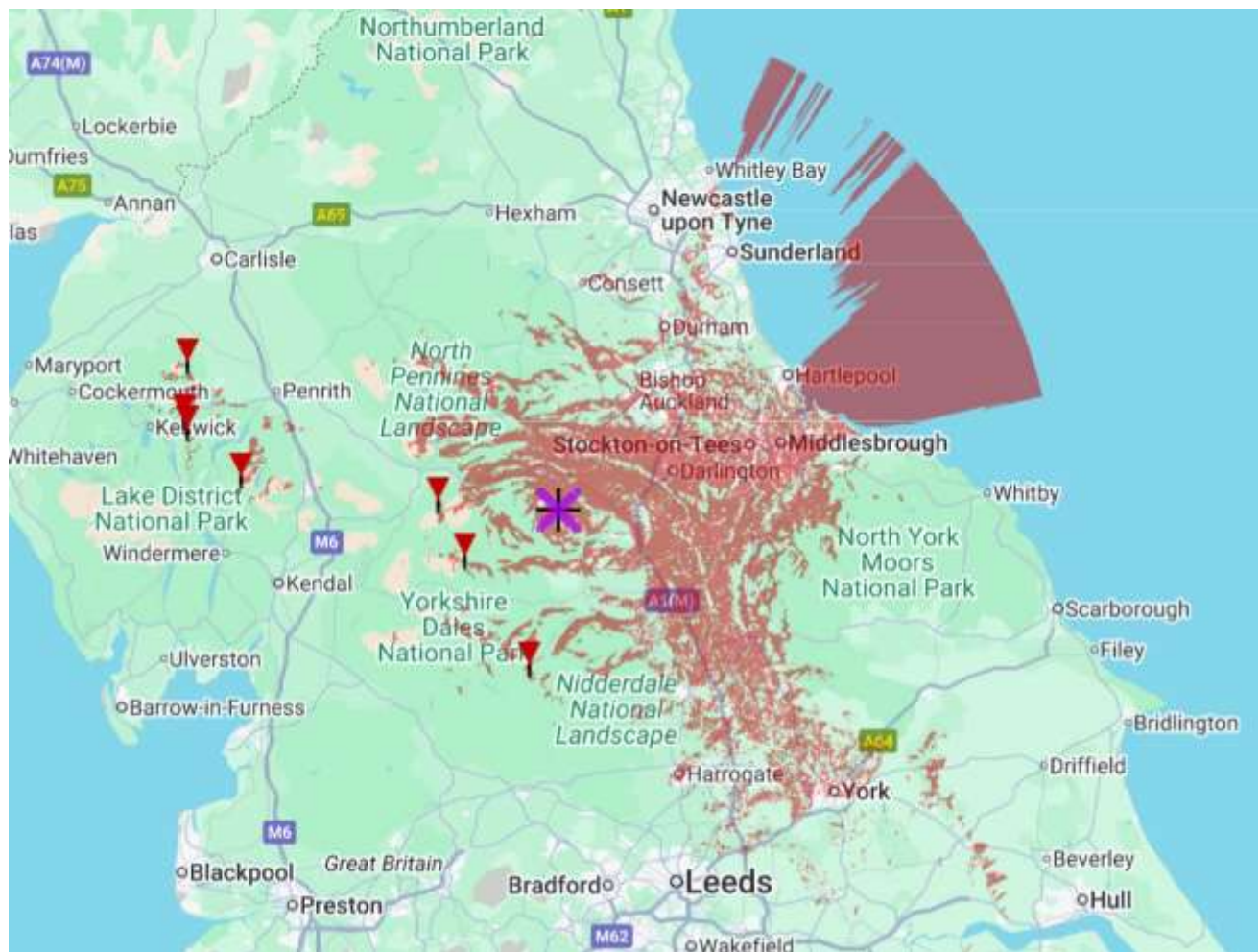
Data relating to water contamination from the proposed site to the River Swale via Marske Beck:



Source: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB104027069140>. Extract reproduced for comparison and comment. Copyright remains with the original rights holder.

The data identifies the Marske Beck from Source to River Swale water body as having moderate ecological status (which the author understands to mean it is not in bad condition, but it is also not good enough to meet the expected environmental standard). Contaminants include zinc, cadmium and its compounds, mercury and its compounds, PBDE, and lead and its compounds. The cadmium, lead, and zinc are attributed to abandoned mine pollution from mining and quarrying.

Appendix L – Community-generated ZTV analysis



Source: <https://www.heywhatsthat.com/?view=SUDWDH12>

Dear Sirs

24 June 2026

EN0110038 Hope Moor Wind Farm-APPENDICES

Please find attached comments and appendices on the Community Consultation process led by Fred Olsen Renewables, and responses to the EIA Scoping Report.

Yours faithfully

Receptor Comments 1 Scoping Report

It is understood that the Scoping Report Comments are to be anonymous/redacted and therefore the details of the persons this has been submitted on behalf of have been removed.

Contents

1.0 Bird Surveys

2.0 Special Protection Areas (SPA)

3.0 Biodiversity Net Gain (BNG) Proposals

4.0 Natural England Criteria

5.0 Aircraft Activity

6.0 Unlicensed Aerodromes

7.0 Listed Buildings

8.0 Government Spending

9.0 Potential Cumulative affects

10.0 Fire risk

11.0 Birds and Migration

12.0 Water Quality Surveys

13.0 Aviation Lighting

14.0 Peat Mapping

15.0 Bat Surveys

16.0 Grid Connection

The Report for Hope Moor Wind Farm fails to adequately address the following points and the developer should be required to take the necessary steps to address the below concerns and flaws in their proposals.

1.0 Bird Surveys

The results of the bird surveys rely on data for 2022 and 2023. Whilst it is proposed that surveys are being repeated this year (2026), there are incomplete records due to data missing in 2024 and 2025.

A minimum of 5 years' worth of continual data should be provided. The developer refers to NatureScot requirements being less than 5 years, however, this proposed development is not in Scotland; the local authorities and Natural England (and the NP National Landscape) should confirm the requirement as to how many years of continuous bird surveys data should be prepared as a minimum to support the proposed development.

Once the requisite data has been collected, it should be analysed and then mitigation proposed as part of the development process.

2.0 Special Protection Areas (SPA)

The vantage point surveys refer again to NatureScot requirements, not English parameters. 36 hours of data per year for each vantage point is not sufficient and Natural England should be consulted on the requirements to ensure the impact on SPA's are appropriately considered and measured.

Birds from the surrounding areas, including the adjacent SPA, are using the Hope Moor site as functionally linked habitat. If the sightings, based on the developers counts for the 36 hours, were multiplied up for a whole season, it demonstrates a considerable amount of activity.

It is critically important that a detailed study is undertaken to identify the functional linkage of the Hope Moor site to the SPA. Birds do not respect the boundaries of SPAs and therefore the developer must take into account the functional contribution of nearby land, if the bird surveys shown that SPA birds are using the site, even if their use of it is less than the SPA land itself.

The SPA birds will be impacted if the proposed development proceeds as feeding and potential breeding habitat will be removed and potential blade strikes will have a substantial population impact on the bird species for which the SPA is designated (Hen Harrier, Merlin, Peregrine Falcon and Golden Plover).

3.0 Biodiversity Net Gain (BNG) Proposals

BNG has not been adequately considered or calculated. The area impacted and the type, distinctiveness and condition of the habitat needs to be fully assessed and reported on.

4.0 Natural England Criteria

In the EIA Scoping Report - main text, NatureScot is referenced 92 times; this is more than double the number of times Natural England is referenced (41). The proposed development is in England, not Scotland, and therefore all policies, surveys and proposals should be to the scope and standard required by Natural England policy, not that of NatureScot. If Natural England do not have the necessary policies or criteria, Natural England must be consulted to confirm their associated position in each and every instance.

5.0 Aircraft Activity

The site is located in an uncontrolled airspace; any aircraft may fly without contact or clearance from any air traffic control agency from ground level up to 10,500ft.

The proposed assessment methodology is purely desk based. This cannot adequately assess the number of unregistered small drones that are unlikely to appear on radar systems.

Without conducting a practical assessment, the actual number of aircrafts used in the area cannot be quantified.

An assessment of what aircraft activity may be displaced to other areas of the Yorkshire Dales National Park, the SPA and North Pennines National Landscape is necessary, particularly relating to military aircraft that regularly conduct low flying exercises during the day and night (as stated in the scoping report), which has a huge potential to disturb wildlife and cause dispersal.

The report states there are issues with low flying and potential for false plots and reduced probability of detection with a proposed approach of consulting with the MOD and other Airports. Consultation with other stakeholders is necessary given the development will lead to low flying in other areas.

6.0 Unlicensed Aerodromes

Under section 13.7 the scoping report states that unlicensed aerodromes are to be scoped out as there are none within the study area. The definition of an unlicensed aerodrome is a site where an aircraft can land and take off without a formal license from the CAA. These sites can be large airfields or private farm airstrips. Areas where a field is used as an aerodrome for no more than 28 days annually do not require planning permission and so the developer can't

categorically say there are no unlicensed aerodromes as most will not have any formal registration at all.

In addition, helicopters take off, fly past/through and land regularly across multiple locations surrounding the development site, especially during the game shooting season over the autumn and winter months. An appropriate study is therefore needed to assess this.

The study area for unlicensed aerodromes, aeronautical radio navigation beacons and aeronautical radio communication transmitters/receiver sites is a 10km radius of the site boundary; to say there are no unlicensed aerodromes within the study area is erroneous and displays inadequate data collection which must be resolved.

The study area should also be extended to obtain a full picture of aircraft activity from unlicensed aerodromes in the region. There is a private airstrip within 3.5km of the development site.

7.0 Listed Buildings

There is a Grade II listed building within 400m of Turbine 18. A Heritage Assessment should be undertaken to establish how this development impacts the listed building as well as any mitigation measures that could be considered.

8.0 Government Spending

The UK Department for Environment, Food & Rural Affairs (DEFRA) and the Rural Payments Agency (RPA) spend millions annually on moorland restoration works through Countryside Stewardship Schemes and similar initiatives relating to peatland restoration projects. The scoping report acknowledges that parts of the site has undergone grip (drain) blocking, indicating peatland restoration works have taken place on the site. This is mostly like funded by DEFRA.

The developer should assess and publish what the government expenditure to date has been on the site's peatland restoration projects, including any immediately surrounding moorland which is assessed as impacted by the development.

A report should then be commissioned by the developer to demonstrate how and where the equivalent restoration works that have been undermined will be delivered elsewhere, at their expense, in addition to any statutory BNG obligations.

9.0 Potential Cumulative affects

Under section 5.6.27. it states that the proposed scope for the cumulative search area for the Landscape Visual Impact Assessment includes turbines above 50m in height within 45km of

the project, non-wind national infrastructure developments within 45km and non-wind local developments (major applications) within 10km of the project.

Given the remote location of the development, non-wind local developments (major applications) should have the area increased from within 10km of the project to within 25km of the project to fully evaluate major applications that may be visible on the horizon.

10.0 Fire risk

Fire risk has been scoped out of the report with no regard to wildfires; it states there is no fire risk due to the location of the site, only due to the risk from the project. This is untrue, wildfires are becoming increasingly more common due to climate change and human influence. In 2025 46,000ha burned nationwide with the largest fire being less than 80km away from the development at Langdale Moor in the North York Moors. The fire burned for days and left 10 square miles of charred and devastated moorland. The average cost of a UK wildfire is approximately £10,000 per hectare when all impacts are accounted for (such as firefighting and emergency response, damage to land and wildlife, health impacts from smoke pollution, infrastructure restoration and lost income) meaning the Langdale fire cost £25.9m.

With no plans put forwards on how fuel loads on Hope Moor will be managed, fire is a very real concern. If the vegetation is left unmanaged, the fuel load will increase, adding to the potential devastation. Hope Moor has full public access which heightens the risk of wildfire from, for example, cigarette butts and disposable barbeques.

The developer has suggested many community benefits and investment pledges but it is key that they demonstrate how they will manage fuel loads/wildfire risk and invest in resources to combat wildfires, should a fire break out.

11.0 Birds and Migration

The height of the turbines is disastrous for migratory birds such as curlew. Curlew are an endangered species that have seen a 50% population decline in the last 25 years, their conservation status became red over ten years ago, giving them the highest conservation priority in the UK.

Curlews migrate from tidal mudflats and coastal areas to the Yorkshire Dales to breed and raise chicks on grassland and moorland, they're extremely site faithful and often return to the same farm and in some cases the same field.

In Section 8.7 the developer has Olsen scoped out Barn Owls, Nightjar, Passerines, Gulls and Migratory Waterfowl from the Ornithology chapter for various reasons (such as being low flying) which we disagree with. This should be assessed on site.

In addition, wildfowl were scoped out due to surveys not showing notable activity; this is not the case because at some times of the year, there is reduced activity, but in early to mid-autumn, the wetlands within 5km of the site are filled with wild migratory wildfowl.

Due to the scale of the development it is appropriate to request the developer ensures that all species are surveyed in depth with records of their activities established. The developer should not just rely on previous surveys which are outdated. The developer should obtain at least 5 years' worth of continuous migratory data and then propose appropriate mitigation strategies for consideration by the relevant public bodies.

12.0 Water Quality Surveys

The Scoping Report states that the water environment baseline and consideration of any other downstream surface water receptors will be developed at later stages of the assessment. The stated precautionary distance of 2km downstream from the project is not sufficient.

The developer should obtain historical records of water quality sampling, ground water monitoring points and surface water monitoring points. Hope Moor has various features that are likely to impact water quality such as lead mines, coal workings, shafts, shake holes, dissolution features, private water supplies and peat.

The developer must begin to gather the following information to inform the scoping opinion: seasonally representative baseline surface water and ground water monitoring, monitoring 8km upstream and downstream of all water courses within the study area, testing for pH, conductivity, turbidity, suspended solids, dissolved oxygen, acidity/alkalinity and relevant metals such as lead, zinc, cadmium and arsenic.

The developer must also complete a private water supply inventory within 2km of the site with source, yield, quality and source pathway receptor assessments. The baseline period must be agreed with the Environment Agency to represent seasonal variability. Promising monitoring immediately before construction does not suffice.

13.0 Aviation Lighting

Section 8.7.12. states that the site has not been identified as being important for species susceptible to elevated risks of collisions with lit turbines. This is false and needs reviewing to evaluate the presence of migratory birds who migrate at night, such as curlew.

The developer should arrange independent surveys on migratory patterns within 45km of the site as that is the distance in which the turbines are theoretically visible.

There is substantial evidence that shows that the colour and mode of lights interfere with magnetoreception in migrating birds, meaning certain colours and flashing patterns attract

birds. The developer should research colours and lights affecting migratory birds and publish the findings to inform aviation lighting decisions.

14.0 Peat Mapping

The developer has prepared peat depth maps, but these are not at an adequate scale to enable informed decisions to be made regarding the proposed development. The initial survey uses a low resolution 100m x 100m grid. The developer has outlined plans for further surveys, the first of which is desk-based however, the most up to date peat depth map produced by DEFRA and the Natural Capital and Ecosystem Assessment programme (NCEA) is inaccurate and the results unreliable.

Practical peat depth measurements using a measuring stick should be undertaken as part of their Phase 2 mapping, although using a 10m x 10m grid to update the siting of the infrastructure (turbine bases, crane pads and cable trenches etc.). Once drafted, more detailed 1m x 1m site surveys should be undertaken where infrastructure is to be laid, to measure peat depth.

The developers focus should be on producing an accurate picture of exactly what peat is going to be affected across the site, as it is important for the scale of peat damage to be understood.

15.0 Bat Surveys

The report states that the proposed scope of the survey work is designed to meet current NatureScot survey guidelines, which again, may not be representative of English requirements.

Initial surveys were carried out in 2024 when the scheme design only had 19 turbines. The developers are proposing updated activity surveys in 2026. The proposed desk-based analysis and scoping to identify features of potential value is not deemed adequate and full surveys are required to produce updated results.

The report again refers to NatureScot guidelines, not English ones, and states that in accordance with these NatureScot rules, any key features identified within 200m (plus rotor radius) of the turbine locations will be subject to further investigation.

The methodology of this survey does not seem replicable as identifying key features from online imaging is entirely subjective. The developer also needs to clarify what is meant by "further investigation". The next step proposed is an automated bat activity survey, which entails (again as per NatureScot guidelines) placing detectors within the developable area and at ten potential turbine sites plus a third of additional turbine sites, with 10 nights of recording in each of spring, summer and autumn.

Natural England should clarify their stance on bat surveys and set their own guidelines if they do not have them already. As part of the NatureScot automated bat activity survey, weather

data including windspeed, temperature and rainfall must be recorded as they are important for the interpretation of bat activity data and need to be recorded nightly for all types of bat surveys.

The developer has proposed to use publicly available weather data for Richmond from www.weatheronline.co.uk for rainfall as well as weather information for both previous surveys and 2026 future surveys. Using weather data for Richmond is entirely inaccurate due to the significant difference in altitude and topography. The development site will have much higher windspeeds, more variable temperatures and increased rainfall, so without having alternative weather recording data from the site directly, the data sets provided by the bat detectors are worthless and must be re-done.

The developer must reevaluate the methodology of the proposed surveys and look to establish on site, automated weather stations at representative elevations and exposures that record conditions with at least ten-minute intervals.

16.0 Grid Connection

Grid connection, for a project of this type and scale, should not have any sections of the grid connection process scoped out of the proposal, be it the onward transmission infrastructure or parts of the project-specific connection infrastructure. The project should be considered as a whole as the works required to connect to the grid will also be significant and will have a significant impact on the local area socially, economically and environmentally.

Receptor Comments 2 Scoping Report

Scoping comments- Geology and Soils:

The EIA Scoping Report identifies that the area contains dissolution features, but it does not identify the cause of these features – karstification of the Main Limestone – and the potential risks that come from this. This is significant, because the Main Limestone in this area has been subject to significant hypogenic karst processes during its geological history, resulting in the formation of extensive and substantial cave passages and networks of connected caverns covering hundreds of metres in various locations. These are expected to be very close to the surface (within a few metres) in some places and hence pose a major geohazard to turbine foundations and associated temporary and permanent infrastructure such as haul routes and access roads. In addition, modern karst drainage flows underground, typically at or near the base of the Main Limestone in a number of areas.

Evidence for the karstic nature of the Main Limestone is found within Appendix 10A to the report, but is not recognised as such. Swaledale and Arkangarthdale, extending as far as the Stang (Scargill Mine) are well known for historical lead mining and this is reported in this Appendix and summarised in the main report. However, the connection is not drawn between the mine plans included, which show a number of locations where the mines intersect natural cave passage (e.g. nearby Windegg Mine Caverns), and the potential for cavities beneath the wind farm site.

While there are currently no known caves beneath the footprint of the proposed wind farm, the site is very close to several extensive known cave systems beneath the Stang: the multiple hypogenic mine caverns within Faggergill lead mine, and the >11km long hypogenic maze cave development of Draughting Hole / Missed Pot on the Main Limestone bench of Scargill High Moor. These cave systems contain numerous solution enlarged fractures at spacing of between 2m and 10m extending laterally over many hundreds of metres. While most of these cavities are only between 0.4m and 1m in width, some of the larger halls in these cave systems are in excess of 10m long (see images attached). There is no reason to suggest that the Main Limestone beneath the Hope Moor site will not be karstified to some extent, and the dissolution features in the area confirm this.

These cave systems have been largely undocumented until the last five years so there is little public domain information available. However, current scientific mapping and water tracing projects are revealing detailed information that can be made available. This work is by no means complete and the cave systems are expected to be much more substantial than currently known. I wrote to this email address on the 17th November 2025 to offer to discuss these projects and the information available

with the Hope Moor engineering team, but this was never taken further, resulting in this geohazard being underestimated in the EIA Scoping Report.

In respect of the particular questions asked in the Scoping Report, I make the following responses:

Q9.4: Do you agree that the scope of the proposed assessment is appropriate?

With respect to the hydrogeology of the site, it needs to be appreciated that the karstic nature of the aquifer means that there may be subterranean catchments that are divergent from surface catchments. Without understanding this, any source-pathway-receptor framework for assessing pollution risk may not correctly identify receptors and therefore any associated risks.

Q10.1 Should any additional investigation or data sources be considered when assessing baseline conditions?

The EIA should include specific risk assessment with respect to karst geohazards. The engineering team should be compiling existing cave plans, and planning/conducting site investigations targeted at identifying shallow voids. This could include geophysical techniques, as intrusive techniques alone may miss sporadic karst features. However, intrusive techniques that penetrate the Main Limestone should be included at proposed foundation locations, rather than just identifying peat depths and depth to bedrock. Any site investigation should also be used to inform a risk based approach for construction in case of encountering voids.

Q10.2: Do you agree that the scope of the proposed assessment is appropriate?

Ground instability assessment needs to extend beyond historical mining hazards, and landslide risk to also include karst geohazards.

The EIA also needs to include the impact on the unique karst environment of the construction process, and how any impacts will be mitigated, e.g. in planning or during construction if unforeseen (but not unforeseeable) cave systems are encountered.

Q18.3: Do consultees agree that major accidents and disasters can be scoped out of the EIA?

I do not believe that the risk of ground instability or subsidence can be scoped out until a ground investigation and follow on interpretation has been conducted that includes for identification, characterisation and assessment of karst geohazard risks. Only then will it be possible to properly understand the nature and magnitude of the ground instability risk.

Receptor Comments 3 Scoping Report

Comments on the Consultation Process
Not all Parish Councils in the affected area are invited consultees. The Parish Council for Reeth, Fremington and Healaugh (RFH) has been exclude, despite RFH Parish extending far into Arkengarthdale, with the furthest reaches covering the area directly opposite the site.
Release of the Scoping Documents a month before public consultation closes is unreasonable. Community Consultation should feed into Scoping, and individuals have had to read, digest, understand and feedback on ~1000 pages of complicated technical data within the timescale. Running in parallel has also caused confusion over who can reply to which aspect, and what information is required. No clarification is available via the Fred Olsen Renewables (FOR) Hope Moor website.
I requested hard copies of the scoping documents as I find reading online difficult. I was told by FOR that "we are not providing hard copy versions of the EIA Scoping Report, its appendices, or figures" (email 10 June). As hard copies were sent to Marske Parish Council by the Olsen team, I submitted a repeat request which was again met with refusal. Requests for references quoted in the scoping documents but not available through the links provided were submitted on 10 June (Ref 17-14, Ref 17-22, Ref 4-19, Ref 5.2) - working links were provided on 18 June. <u>These are accessibility issues and limited/delayed my ability to engage in the process.</u>
FOR Community Liaison Group meetings were poorly organised, with Arkengarthdale Parish Council not invited to the first meeting. Meeting attendance was limited to one member of each Parish Council with Parish Council Clerks initially excluded from the process and agendas being sent direct to specific councillors. This goes against local government policy. Feedback and output from CLG meetings has not been properly communicated to the public, with limited minutes available through the Hope Moor website.
Community Consultation meetings were poorly advertised locally. Meetings in the two main towns noted in the Scoping Document (Barnard Castle and Richmond) were 9am to 12 noon on weekdays, meaning anyone who works was unable to attend. A reliance on social media meant that many residents were unaware of the process. A flyer sent to residents by Royal Mail was not received by every household.
Documents on display at the Community Consultation sessions quote the Community Benefit fund at £750k per annum. It was not stated in the Consultation paperwork or at Community Consultation meetings that this fund is shared across 14 parishes. This is misleading the public by dangling a financial "carrot". No detail was available on how this fund would be administered.
Visual imagery at the Community Consultation Meetings was misleading. The single image of a wind farm landscape showed 70m turbines across a wooded landscape with no ancillary infrastructure (roads, other buildings). Images available through the website (www.hopemoor.co.uk) are not representative of the actual scale of the project, featuring a man on stilts who appears the same height as the turbines. ZTV maps were too low-resolution and too small scale to identify individual (remote) properties to assess visual impact. "Blade Tip" visibility was questioned and clarified as it was not clearly stated that this could mean "full turbine".
Alternative routes to site have not been mentioned at any point during the Consultation process. All focus has been on the A66/Newsham access route with residents of other areas unaware of the risks.

Comments on the Scoping Document are grouped according to the relevant section. Comments may be repeated in other sections if the concern overlaps more than one aspect of the project.

1. Introduction

1.1.3 No definitive construction size requirements. Phrases such as "not limited to" suggest that construction requirements could be in excess of those suggested. Without accurate plans it is impossible to gauge the level of damage to the moor.

1.1.4 The proposal aims to "ensure that Hope Moor is integrated within the wider cultural and environmental landscape". The only comparable structures in the north of England are TV and radio masts, which are single, static features. The turbines are as tall as the Deansgate Tower in Manchester (the tallest building outside London) and taller than anything in Leeds or Sheffield. How will this be integrated into the landscape?

2. Project Description

The site boundary is not clearly defined - how far may it extend? There are concerns that adjacent moorland (Hurst, Marrick and Skelton Moors, as well as Holgate Pasture) could also be at risk of development either through this project or in the future. FOR developments at Crystal Rig show that this is not an unreasonable concern.

2.2.2 There is no explicit mention of alternative routes to site in any paperwork. The site is not "between the A66 and A6108". The site is directly accessed **from all sides** via minor roads - none of these roads are suitable for heavy construction traffic.

Any alternative route to site will involve steep, narrow minor roads already subject to repeated subsidence, physical width restrictions (cattle grids and bridges), heavily wooded sections and hairpin bends.

Use of these minor roads by construction traffic present disturbance and risks to (but not limited to) properties adjacent to these roads, local road users, tourism businesses, tourists, cyclists and horse riders (Dales Bike Centre and Arkle Moor Riding Centre are both on the Arkengarthdale route), children playing on open spaces and free-roaming livestock. It also brings noise and nuisance to residents from heavy early morning traffic based on the proposed 7am to 7pm operating hours.

If these routes are to be used, it is likely that significant new infrastructure would be required to facilitate the vehicles required. This could mean new roads and bridges, mostly within the Yorkshire Dales National Park. Such work would require careful assessment to prevent disruption to school bus routes, commuter traffic, tourist use and accessibility to the National Park, and to ensure that works do not have a negative effect on the visual aspect of the YDNP.

Consultation with North Yorkshire Highways, the Yorkshire Dales National Park and the Ministry of Defence is required (the latter as work to the Cordilleras route would impact MOD activity).

2.5.9 Micro-siting "allows for limited adjustments" and suggests minimal, careful positioning. How does this fit with the mining survey which recommends 40-50m deep bores to assess land stability and establish the absence of mining/voids? If the turbine locations are as shown, micro-siting may not be possible if the bores show the position to be unsuitable. It is impossible to estimate the position of the turbines (particularly to assess visual impact) until macro-siting/full auger assessment has been carried out.

2.5.16 Artificial light during construction would cause disturbance to the bird habitat, affecting many species including red-listed (e.g. Curlew, Lapwing, Ring Ousel)

2.5.15 Aviation lighting would be visible from miles around and would disturb birds and bats on the site, as well as affecting Dark Skies status

2.5.19 The Scoping document states underground cabling will be adjacent to access tracks "where possible". This provides no guarantee that further damage to the peat moorland will not be caused through digging of an unspecified number of trenches.

2.5.24 - Removal of wildlife habitat. The access road proposed from the A66, and the haul road to be constructed to run to site, will involve the removal of established hedgerows and trees – a further loss of wildlife habitat and visual amenity.
2.5.29 Discussing "borrow pits" the Scoping document states that "if appropriate areas are identified, a description of likely materials, borrow pit size and the ability to supply...would be included in the ES". How can the ability to supply aggregate and borrow pit size be determined if the aggregate is a "likely" material? What is the definition of a "likely" material? How much aggregate would be excavated? This needs to be stated in order to assess damage to the moors. To call these "borrow" pits is misleading, as the aggregate used in road construction etc will not be returned to the pits, but will remain in situ on the moor. Quarrying will also cause associated disruption for residents in terms of noise, dust and increased road use. A full understanding of local geology is required to assess the risks from a combination of peat removal/disturbance and removal/disturbance of the underlying geology, including the risk of peat slide, geological collapse and release of heavy metal contaminants into water supplies.
2.5.41 The scale of ancillary construction is unclear as the type and location of temporary construction compounds are still to be determined. All structures need to be included in Scoping as, without these plans, the scheme cannot be properly quantified and potential damage to the moor assessed.
Should a concrete batching plan be required, a full assessment of the quantity required and potential impacts of water supply to the site, both on the surrounding area and water courses (including private supplies to homes, farms, businesses and mains supplies, given recent summer droughts), is required. Consultation with the local Water Authority is required.
Substation – Where will this be? The size is not specified.
2.5.47 Grid Connection. It is unreasonable to scope a project without a full understanding of how the energy generated will be transferred from the onsite substation to the National Grid, and what infrastructure such a connection would require. A full assessment is required to determine distance to connection, power loss as a result of distance, and the impact of this onward transmission on the wider landscape. Would pylons be wooden pylons, as shown in on the www.hopemoor.co.uk website, or significantly larger metal pylons? Given the distance from the National Grid, is there a chance that this connection would prove unfeasible, leaving the wind farm unable to feed into the grid? Again, mixed messages from the FOR team, who discussed the grid connection at Community Consultation meetings and in the Community webinar as though it was part of the proposal, rather than admitting it was not within the scope. Note that the Scoping Document had been released at the time of the webinar.
2.5.31 Water course crossings are proposed to have a 50m buffer. Is there a risk of contamination from road materials/vehicle emissions (including transferred wheel debris from off-site) etc to the water supply. Again, these will be minimised "as far as possible" – is this acceptable when dealing with a water course that ultimately supplies homes, farms, wells, streams and businesses in the area?
2.5.42 Water Pollution from construction. Where will the run-off from construction and excavation go? What impact will this have on the local water table and water quality? How will pollution be prevented from entering the local water courses? The Scoping document speaks of monitoring watercourses in the immediate area, but this is problematic as issues may be seen further downstream than assessment covers and, at the point in time that issues are identified, pollution is present and the damage is done. Note that there is no mains water supply in the area to connect to. Loss of drinkable water would be life-changing for residents.

2.6. Construction Phase
2.6.14 Public Access management plan only discusses PRow. The site is predominantly Registered Common Land and CRow (open) access land.
2.6.17 The Scoping Document states that peat will be reused "in a manner to which it is suited". This is not a clear commitment that peat will be retained on the moor, as peat has, historically, been used in other settings including as fuel/fertiliser.
2.5.5 It is noted that the final choice of turbine would be "dependent on the turbine economics and available technology options at the time of procurement" suggesting turbines could be taller than the proposed 200m. Until turbine size is fixed it is impossible to accurately assess the impact of these in terms of noise, environmental damage, visual impact etc.
3. Approach to EIA
Who are the stakeholders who will be consulted to "determine the sufficiency of baseline information." given that the bird surveys done to date are flawed (see section 8 - Ornithology)
Figure 3.1 Aygill intake Wind Farm is included in the Scoping document as a "consented" wind farm. This should not be included as it is not a NISP but a local development to provide small scale monitoring equipment.
Q3.1: Do you agree with the proposed approach to EIA for this Project? •
At this stage the project has not been fully scoped out, and the actual scale determined. It is difficult for a non-expert to determine whether the proposed approach is correct when the proposal appears to rely on evidence to be gathered in the future.
Q3.2: Are there any other large-scale developments that consultees are aware of which should be considered as part of the cumulative effects assessment?
Development/completion of the Retail Park at Scotch Corner may need to be factored in as this will have an impact on traffic at the A1/A66 junction. Dualling of the A66 needs to be considered as this will impact on use of the A66 as the access route.
4. Legislation and Policy Context
Conflict with National Planning and Conservation Initiatives: NPPF para 187 states "Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and ... b) [recognise] the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services". Further, paragraph 189 states that "development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas."
Conflict with the Yorkshire Dales National Park Authority objectives: The vision states the YDNP's "unique cultural landscape will be treasured for its stunning scenery, exceptional heritage and wonderful wildlife, and every year millions of people will be inspired to be a part of it". Ambitions include working with farmers/landowners to restore or create wildlife habitats, improve peat moorland, "maintain.. a place where a true sense of tranquility and remoteness can still be found..." , provide "benefits for the nation based on its natural resources, landscape and cultural heritage" and "retain international Dark Sky Reserve status".
Conflict with new YDNP Scheme: The recently announced programme to "support people, places and nature (https://www.yorkshiredales.org.uk/new-investment-to-support-people-places-and-nature-across-the-yorkshire-dailes/)" involves a wide range of projects to improve access to, support communities in and enhance the natural environment of the Yorkshire Dales National Park, creating and extending important wildlife-rich habitats and supporting species recovery.

Conflict with the Government funded Tees-Swale: Naturally Connected scheme (https://www.yorkshiredales.org.uk/park-authority/living-and-working/tees-swale-naturally-connected/hire Dales National Park : Yorkshire Dales National Park): There is a conflict between the proposed scheme and the conservation, restoration and landscape management objectives already being undertaken by publicly-funded environmental programmes and statutory bodies such as the Yorkshire Dales National Park Authority (YDNPA) and the North Pennines Landscape (NPNL) on land adjacent to the site.
Conflict with the Yorkshire Wildlife Trust: The proposal conflicts with the aims of the Three Dales Project (https://www.ywt.org.uk/three-dales-project) which focuses on "restoring the landscape for three iconic upland bird species: black grouse, curlew and ring ouzel. All have perilously low populations in this area, reflecting the fragility of their national populations".
Conflict with the North Pennines National Landscape priorities: "working ...to protect what remains and restore what has been lost", "helping people make an emotional connection with nature" and "conservation, consolidation and interpretation of historic buildings and structures".
Conflict with North Yorkshire Council's conversation guidelines which state that conservation areas and their surroundings "must be safeguarded from indiscriminate or ill-considered change" and that "their surroundings and general environment are ...of equal importance". They believe that "we have a responsibility to ensure that the character of these areas is not diminished in our lifetime" and that "new development must make a positive contribution to the character of the area".
Conflict with Common Land Registration and Rights of Common. The site is part of the largest area of common land in North Yorkshire. Homeowners and tenants will have rights to access and use the land, via easements, covenants and stints in deeds.
Conflict with Co Durham plan -policy 34 "demonstrating that any potential adverse effects can be satisfactorily mitigated"
Conflict with Richmondshire plan - policy CP12 "supports renewable and low carbon energy schemes where any adverse impacts on the character of the landscape, biodiversity, heritage assets, residential amenity and highway safety can be satisfactorily avoided or mitigated"
5. Landscape and Visual
Community consultation meetings provided no visuals of how the site will appear from the surrounding area. The single image of a wind farm was of 70m turbines, with no ancillary buildings/roads.
Visuals to show the impact of the proposal are not available. These should show day and night images and include panoramas and "wireline" images from key viewpoints to enable the public to understand the scale and visual impact of the proposal.
5..3.2 - Richmond and Barnard Castle are the two main towns. Other settlements that must be scoped in as they are nearer to the proposal are: East Hope (1km), West Hope (2km), Scargill (3km) Barningham (3km) Newsham (3.5km) Whaw (4km) Langthwaite (3.5km) Arkle Town (3.5km) Reeth (6km) Hurst (2km) Washfold (2km) and Helwith (2km). There are also numerous isolated homes that do not sit within these "settlements" but still require consideration. This is not an empty area - there are many residents whose concerns need to be addressed, and amenity maintained.
5.3.4 The Stang connects Teesdale with Arkengarthdale, and offers views into Arkengarthdale, not Swaledale.
Security lighting during the construction phase would affect Dark Sky status

The Scale and height of the proposal would alter the setting and 360° open moorland panoramas which are a key part of the special character of the Yorkshire Dales National Park, the North Pennines National Landscape and UNESCO Global Geopark as well as the area, including Hope, Kexwith and Holgate Moors, which sit outside the National Parks but are immediately adjacent to these protected areas. It is noted that figure 5.8 of the FOR Scoping data shows part of the site to be within an Area of Higher Landscape Value.

Visual impact upon Conservation Area:

The archaeological assessment details the Swaledale and Arkengarthdale barns and walls conservation area and states "...views would be focused downwards along the valley to the north-west and south east, with wind turbines forming a minimal distraction ...". Areas on the opposing reaches of the Dale from the site include a number of residences, which currently enjoy uninterrupted rural views up, down and across the valley towards Booze Moor. The famous view into Arkengarthdale from Yellow Houses/Raw Bank (what3words flames.pumpkin.walked) is in the ZTV. This is not from "atop the higher reaches of the dale" but from the public road which runs from Reeth, through Arkengarthdale towards Tan Hill. The turbines would be highly visible, standing 200m tall (i.e. the height of Fremington Edge) and immediately visible on the right of the above viewpoint. Views from the same road looking down into Arkengarthdale in the opposite direction (from above the Stang junction) would similarly experience the turbines as a visual intrusion on the skyline. The rural views are appreciated holistically - i.e. including the skyline and to state otherwise suggests the author has not visited the area.

• Q6.2: Do consultees agree with the proposed 45km LVIA Study Area?

Blade Tip ZTV - the range needs extending. AI modelling suggests that Hope Moor will be visible from the Lake District Peaks - not as a distant view, but as clearly identifiable individual units. From the top of Great Pinseat (within the YDNP), the effect will be to "occupy and redefine the skyline, resulting in a markedly greater magnitude of visual effect." The impact upon walking and running routes including the Three Peaks and the Swaledale Marathon needs to be assessed (this is missing from the Scoping list)

Q6.5: Do consultees have any comments or suggestions in relation to the Preliminary Representative Viewpoint Locations shown in Table 5-3 and illustrated on Figures 5.2 - 5.5?

Receptor -Visual impact from YDNP, North Pennines National Landscape and UNESCO Global Geopark. The site will be in direct line of sight of many historic and listed buildings (e.g. Bowes Museum) and hilltops throughout the Yorkshire Dales National Park, North Pennines National Landscape and UNESCO Global Geopark and Lake District National Park. The view from Calver and Great Pinseat in Arkengarthdale (within the YDNP) are currently a 360° panorama of level undeveloped moorland. The proposal would change the open moorland views and affect the setting of the YDNP, North Pennines National Landscape and UNESCO Global Geopark. Viewpoints proposed within the Scoping document are insufficient in both number and location. Plateau tops are predominantly treeless, and even a hawthorn tree is highly visible against the horizons. Suggested views should include the following what3words reference locations -these are either within the YDNP or are at key access points into Swaledale/Arkengarthdale - i.e. the point at which tourists may decide which direction to travel.

High Carl, Whitaside-///depending.tickles.nursery

Gibbon Hill, Harkerside-///solder.carry.worthy

Blea Barf, Crackpot Moor-///startles.water.mason

Calver-///magazine.happily.masterful

Rogan's Seat-///universes.mugs.spending

High Moss, Grinton Moor-///emerald.seducing.hampers

Fremington Edge Top-///shameless.kind.about
Kitley Hill, Arkengarthdale-///months.wimp.cringes
Fleak Moss (entry from Askrigg)-///breaches.transcribes.tenders
Greets Moor (entry from Redmire)-///initiated.silver.riot
Whipperdale Bank (entry from Leyburn)-///spoiled.represent.attend
Whaw road (view down from Tan Hill)-///regulator.clenching.reporters
Whipperdale Bank-///welcome.trifling clotting
Grinton Lodge junction-///summit.brochure.backfired
Harkerside footpath-///mallets.revolting.rating
Cordilleras Road-///concerts.careless.obstinate
Washfold view-///sapping.butterfly.bathtubs
View down Arkengarthdale-///gloves.measuring.trailer
Downholme Viewpoint-///turned.trump.agenda
There seems to be a high dependence on Scottish legislation. English legislation should be accessed as this may differ.
Landscape character assessment is limited to 20km radius. This needs to be extended as the turbines will be clearly visible from the 3 Peaks (Whernside, Ingleborough and Pen y Ghent).
2km is insufficient for residential visual amenity assessment. Given the scale of the turbines, the assessment area should be at least doubled.
A previous application for 54m turbines near the site was previously rejected as the "special character" of this area of "high landscape value" would "be seriously harmed". Although the site sits outside the YDNP and NPL/UGG, development would affect the setting of these protected areas. The site is a CPRE National Character Area (NCA21 – Yorkshire Dales). Consultation with the Yorkshire Dales National Park, North Pennines National Landscape and UNESCO Global Geopark, Lake District National Park, Campaign for the Protection of Rural England (CPRE), Friends of the Dales, County Durham Council and North Yorkshire Council is required.
6. Archaeology and Cultural Heritage
fig 6.1.2 shows scheduled monuments batched into "landscape" group. These should be a single unit over the whole of the moor as it's an entire prehistoric landscape
fig 6.2 this clearly shows that SAMs will have their setting affected by the proposal
Newsham Village (and other settlements/properties depending on routes to site) - some houses fronting the road are very old with no foundations - therefore prone to vibration damage from excess quantity and weight of loads. If alternative routes to site are to be used, properties along all these routes will require the same assessment.
Q6.1: Do consultees agree with the methodology set out, including the use of UAV in areas which are assessed to be a health and safety issue for industry standard surveying?
It is suggested that UAV can carry out field assessments in lieu of surveyors due to the health and safety risk posted by mining shafts and shakeholes. The data available from such survey needs to be fully understood, as aerial views are very different to "on-the-ground" views of features. This suggests that desk-based studies can fully appreciate the landscape in question, which can only be experienced by being present in it. The opinion of experts in local archaeology such as Tim Laurie and Prof Richard Bradley should be requested.
Q6.2: Do consultees agree with assets and matters scoped out?
The FOR Scoping appendices "scope out" the majority of heritage assets on the basis of their setting in the landscape, and state they will not be affected by the wind farm. Examples of this are:

NHLE 1002316 Roman Fort (Lavatrae) ... While views from the asset are "primarily" to the east and west, views to the north and south cannot be discounted. 7.1 km from the nearest turbine cannot be considered "distant" given the scale of the wind farm.
NHLE 1012602 and NHLE 1012617 Grinton–Fremington Dykes. Up to 23 wind turbines are predicted to be visible from the assets to the north, ..While views may be focused downwards, 23 turbines will be visible if the viewer raises their eyes. This clearly affects the setting as the "backdrop" will be a wind farm of a similar height to the escarpment on which it sits. Similarly:
NHLE 1012609 Maiden Castle prehistoric defended settlement and adjacent round barrow - Iron Age hillfort with, on the eastern extent of the avenue, a round barrow of likely Neolithic to Bronze age. ... This paragraph contradicts itself - the assessment admits that views to the north "do contribute to the asset's setting" but then dismisses these as anyone at the site would only look down, not up to the northern ridgeline.
NHLE 1012603 Ring cairn on Fremington Edge 650m; NHLE 1012611 Ring cairn on Fremington Edge Top; NHLE 1012600 and NHLE 2022601 - Ring cairns; NHLE 1012615 Ring cairns on Riddings Rigg; NHLE 1012612 Embanked small stone circle, Harkerside Moor; NHLE 1012613 Ring cairn and adjacent round cairn on Low Moor; NHLE 1012614 two adjacent ring cairns Intervisibility between these assets is noted in some instances but not as a series of features in the prehistoric landscape. The turbines will clearly have a significant impact on the setting of these SAMs, as part of their location in the wider prehistoric landscape.
NHLE 1015854 Lead mines and smelting mills at Moulds Side west of Langthwaite. ...Up to 23 wind turbines of the Project are predicted to be visible from the asset to the north-east. As long-distance views in this direction do not contribute to the setting of the asset" 5.5km from the nearest turbine cannot be considered "long distance" views. The turbines are as tall as the escarpment at the forefront of the view, and will be highly visible.
Barningham has 42 listed buildings within the conservation area with 21 wind turbines anticipated to be visible to the south-west. The "tranquil agricultural landscape to the north, west, east, and south-east" is noted. The setting of the conservation area will be impacted as the turbines will not blend into the otherwise rural surroundings.
Q6.3: Are there any assets, not listed in the appraisal, that key consideration should be given to?
Assets are scoped out because " it is not anticipated that the Project will change the setting of the asset to such an extent so as to cause harm to the ability to appreciate it" - this statement appears to be subjective rather than referring to legislation/guidance.
Inclusion of the A6108 suggests that this would be used as an alternative route to site. This requires further assets to be scoped in along the route of the A6108, B6270 and via minor roads as applicable. This is not covered in the scoping document as the main route to site is via the A66 with no alternatives suggested.
The author states "there is no guidance defining what the extent of an appropriate 'study area' should be for the cultural heritage assessment...." but claims "experience ... in similar landscapes across the UK..." and dealings with "projects of similar scale". Clarification is required on which projects this experience relates to, as I am unaware of any similar sites (of this scale and impacting multiple National Parks and protected landscapes) within England. It is important that comparisons are only made with sites in England, as Scottish landscapes fall under different legislation and guidance. If this site is to be used as a precedent, impact on Nationally valued and protected landscapes, and the corresponding loss of these, must be fully assessed on the assumption that further developments within/affecting National Parks will be approved.

Footnote 2 details the lack of a "universally agreed methodology for assessing the impact of development on heritage assets..." and states "While the referenced guidance originates from infrastructure projects such as roads and bridges, the principles it sets out ...are applicable to other forms of development, including wind farms." This appears to be the opinion of the author rather than an accepted set of principles across the Heritage sector, and further discussion with HE is required regarding the difference between building a road through the landscape in question vs the installation of 200m tall turbines.

The reference quoted (Principles of Cultural Heritage Impact Assessment in the UK (July 2021)) is not a referenced document within this Section of the Scoping Document.

The document (https://www.archaeologists.net/sites/default/files/2024-11/CIfA-IEMA-Principles-Cultural-Heritage-Impact-UK_2021.pdf) quotes UNESCO "Cultural heritage is ...inherited from past generations, maintained in the present and bestowed for the benefit of future generations" and states that the Cultural Heritage Impact Assessment must present "an understanding of how the proposed change relates to cultural significance and not the cultural heritage asset in its entirety". It goes on (B8) to state that "adverse impact on cultural significance can come from total or partial loss of a cultural heritage asset through alteration or destruction. Also, it can be the result of change within the setting of a cultural heritage asset that prevents an aspect of cultural significance from being experienced, impact on the character and appearance of the setting, or the alteration of soil chemistry such that important buried archaeological remains deteriorate."

This is key as the setting of the entire Prehistoric landscape around the site (including that to the South) will be visually impacted. Soil chemistry changes caused by alkali contamination of the acidic peat environment may also cause the deterioration/loss of human/other remains possibly preserved within the peat. The document calls for CHIA to be "fit-for-purpose" and "an informed and impartial assessment" and that "there will be value in consulting with cultural heritage stakeholders and advisors at local planning authorities, national heritage agencies, specialist interest groups and members of the public."

Nothing in this guidance suggests that wind farms should be considered a similar form of infrastructure to roads and bridges.

"Significant effects will be determined...through professional judgment". This is subjective opinion.

Assessment of "magnitude" is a subjective opinion.

Grouping of scoped-in assets into 2 distinct groups - these should be assessed as a single landscape group **including all the non-designated assets on the site itself.**

The non-designated assets are part of a Prehistoric ritual/rock art landscape, and an industrial archaeological landscape. The report states that "design changes will need to take into consideration the location of these assets to avoid any potential direct impacts on the heritage assets **as far as possible**". It is difficult to see how both the Prehistoric and Industrial landscapes can be preserved, given the degree of construction required.

It is already accepted (6.4.22) that the contribution of setting to an asset's significance needs to be considered. Only designated assets are included in scoping. Non-designated assets must be included as they contribute to the Prehistoric and industrial landscapes. Non-designated prehistoric assets are as archaeologically important as the designated assets and it is surprising that they do not hold designated status.

Scoping out of "distant cottages and houses to which rural setting is restricted" scopes out all properties in Arkengarthdale. These are set within the National Park and will be heavily visually impacted by the proposal. Their remote rural setting is a key aspect of the overall

aesthetic of the Dale, and the turbines will be a dominant factor, breaking the skyline when viewed from most areas.
"professional judgement ...comparable projects" are mentioned. Detail of these projects is required to demonstrate direct comparison is possible with the site.
The Swaledale and Arkengarthdale Barns and Walls Conservation Area is within 5km of the project, and its significance derives from its contribution to, and setting within, the wider landscape. The Barns and Walls are features within a landscape where the setting and overall aspect with open views (including those of the skylines) are key. This cannot be scoped out.
7. Ecology
Construction presents serious risk of contamination from fuel/human waste/other waste/vehicle emissions. Further chemical assessment of the impact of inserting concrete (alkali) bases, roads, crane pads, blade landing areas etc into a peat (acid) substrate is required, to assess leaching/chemical exchange and potential damage to sphagnum moss.
The Scoping document states that <i>"the application for development consent would include proposals for managing measures to avoid, reduce, mitigate or compensate for potential impacts on landscape and biodiversity resources and measures intended to provide biodiversity benefit"</i> . Biodiversity Net Gain is a requirement of wind farm development. Detail on these measures is required.
fig 7.2 Ecology - Local Wildlife Sites border the site to the east - wildlife will not understand these boundary lines. SINC's and SSSIs take water from the moors - risk of pollution
fig 7.3 ancient woodland abuts haul access area. 7.4.5 FOR Scoping Document states "Ancient Woodland" is "considered irreplaceable" and the risk of contamination to the water supply must be covered. Half the site is blanket bog - construction conflicts with govt protection for peat
The extent of vegetation stripping and topsoil removal is not stated but can only be significant given that construction includes <i>"A hardstanding ... for each wind turbine ...anticipated to consist of a crane pad measuring up to 4,150 m² and a blade laydown area of up to 2,050 m²"</i> Scaling up these figures, there will be 35 acres of land covered with concrete for the crane pads and laydown areas alone.
The Scoping document states <i>"... foundation footprint and working area would be excavated with the foundation footprint being upon competent load bearing strata."</i> The mining survey identifies the risk of unknown historic mines on the site and states <i>"At this stage we would estimate that rotary bores would likely need to be extended to depths of between 40 m to 50 m deep. Furthermore, a trenching exercise to locate the indicated mine entries may be required depending on the proposed turbine locations, cabling routes and road layouts"</i> There is no indication of how many rotary bores would be required in total, and what the impact would be upon peat and water/drainage on site.
There is a risk that rotary bore investigations could exclude numerous planned "shallow peat" sitings through the identification of historic mining levels, forcing repeated augering to identify suitable locations. It is possible that this would necessitate the relocation of multiple turbines to more visible positions/possibly in areas of deep peat. Trenching would add to the peat removal load.
Detail on macro and micro-siting methodologies needs to be provided, allowing for such major relocations and taking into account visibility of turbines and avoidance of deep peat areas and archaeological assets. The visual impact can change significantly even through small variations in turbine height and location.
7.9. Further Consideration for Consultees
If original bat surveys were based on 19 turbines on site, were all other surveys done on the same metric?

RCA - proposal to carry out RCA assessment only at all potential water course crossings. This is problematic as it is stated in 2.5.31 that water course crossings will be avoided where possible. Pollution to a particular water course could take place but not be detected if this methodology is employed. These water courses not only feed private water supplies to homes, farms and businesses in the vicinity but are direct habitats for reptiles, amphibians and invertebrates, and a key part of bird habitats.
"surveys for reptiles, amphibians, invertebrates and other priority mammal species are not proposed" - adders, lizards and newts (a protected species) are present on the site and the impact upon their habitats must be assessed. Newts are present at similar altitudes in Arkengarthdale.
Full impact upon SSSIs (Brignall Banks and Shaw Beck Gill) must be assessed as potential habitat environments.
Construction impact (dust) upon the North Pennine Moors SAC and all surrounding areas must be assessed. Concrete dust would cause changes to water and soil chemistry, potentially damaging delicate peatland.
The Olsen team stated (June webinar) that during the operational phase a "small permanent team" of engineers will be on site. This will require staff facilities including toilets. How will this be managed to prevent possible contamination from human waste if a sewage treatment plant is installed?
Impact upon SINCs must be assessed. The risk of pollution from construction (including, but not limited to, concrete batching and wash-out activities; fuel storage upon the moor; waste management practices on site) needs to be understood and appropriately mitigated.
.
Surveys appear to be from 2024 at the latest, while work to improve the moor has been ongoing. Up to date surveys need to be carried out as habitats may have expanded for hares and hedgehogs.
Surveys appear to be from 2024 at the latest, while work to improve the water courses has been ongoing. Otter, water vole, fish and white-clawed crayfish surveys need to be redone as habitats may have expanded.
Blanket bog habitat is noted as "Regional" importance. This is noted as an irreplaceable Priority Habitat Type with Government protection and extensive funding, suggesting this should be upgraded to National importance.
A disused agricultural building is noted in the Haul Route Search Area - this should be assessed for Barn Owls as well as bats, noting that Barn Owls are more likely to be disturbed by construction activity.
No discussion of habitat loss through hedgerow removal as road-widening works.
NatureScot guidelines on buffer zone - no English legislation?
Vegetation clearance - "Micro-siting of project elements will be used to avoid important ecological features, where possible"
"All temporary construction areas will be reinstated to their original condition in terms of vegetation cover, except where they are to be enhanced." - how will this be possible if peat is removed? Evidence is required to show that peat can successfully be cut and relaid without permanent damage to its inherent structure or carbon storage properties.
Best Practice: "...dust suppression measures (if required), to be used as appropriate to prevent the migration of pollutants" - this will not prevent the migration of pollutants, but will move them to an alternative environment i.e. suppression of dust via water sprays will prevent airborne pollution through dust transfer, but will add to ground pollution through the wetting and grounding of dust particles. Similarly "regular cleaning of roads of any construction waste and dirt" will add to groundwater pollution.

Operation and maintenance: "feathering... will be considered and implemented, depending upon the findings of detailed assessment" What are the implications is feathering is not implemented in terms of additional wear and tear/loss of productivity etc?
Operation and maintenance: the use of machinery containing potential pollutants which could include cooling oils, lubricants, fuels, greases, etc. is noted. Given the "green" status of the project, and it's identification as "onshore and offshore generation that does not include fossil fuel combustion" it is worrying that a high proportion of construction and operation will rely on fossil fuels. These need to be factored into full lifecycle assessments that demonstrate the "green" credentials of the project.
"Additional mitigation measures will be considered where significant effects are anticipated to remain after embedded design measures and standard good practice controls have been applied. If residual impacts persist, proportionate further actions, such as mitigation and compensation will be identified to address those remaining effects" - What does this mean? What kind of mitigation would remain? Compensation suggests mitigation is not possible
"Detailed discussion is anticipated with key consultees in respect of compensation requirements for any loss of areas of irreplaceable habitat." Any loss of irreplaceable habitat (i.e. blanket bog) cannot be mitigated through compensation. It is, as it says, irreplaceable.
The document details barotrauma. This paper (https://www.sciencedirect.com/science/article/pii/S0960982208007513) assessed 188 bats killed at turbines in a single night. Deaths were shown to be caused by air pressure changes around turbine blades which appear to affect the lungs of mammals, rather than impact trauma. This could be catastrophic for bat populations in the vicinity.
Scoped Out
Brignall Banks SSSI. Hydrologically connected to the site, therefore at risk of pollution from construction including, but not limited to, spills from vehicles, concrete batching and wash-out, waste management (including human waste).
Receptor - Water pollution – impact on vertebrates/wildlife. Water from the moor drains into numerous natural water courses which will be home to many aquatic species, including newts (a protected species). These could be impacted by run-off pollution from construction. Part of the moor system feeds directly to Brignall Banks SSSI via Gill Beck. North Yorkshire Sites of Importance for Nature Conservation (SINC) are identified on the site boundary (Low Easegill, Moredale Beck, Locky Wood, Rispey Gill) and Figure 15.1 in FOR Scoping documents shows ancient woodland (Locky Wood and Barningham Park) borders the site while Rispey Wood and Waitgate Wood both receive water run-off from the moor. Pollution in the water supply could affect all of these protected areas. Section 10 discusses sulphide rich ores on the site, which are "likely to contain elevated concentrations of lead (Pb), zinc (Zn), cadmium (Cd) and arsenic (As). There is no discussion of the possible health impact (to humans and animals/birds) of heavy metal contamination on local water supplies.
8. Ornithology
8.1. Introduction
fig 8.1 Confusing. Seems to show SSSIs but not detailed on key. SSSIs on site are not shown.
fig 8.2 Ornithology flight activity survey area 2022-24. Miss out Moresdale Ridge, Holgate Pasture and Barningham Moor. Curlew are known on these areas and will not respect vantage point location boundaries
fig 8.3 Breeding and wintering bird surveys apr 22 to aug 24 - miss out key areas (Fell End Moor, Holgate Pasture, Barningham Moor)

fig 8.4 flight activity 2026 breeding season - misses key areas (Holgate Pasture and Barningham Moor)
The site has been identified as "Right use, right place" on the basis of:
• <i>existing compatible land uses, such as grazing and grouse moor management, which can co-exist alongside wind farm infrastructure and support practical construction, operation and maintenance.</i>
The site is home to the curlew "argued to be the bird of greatest conservation concern within the UK" and around 130 other species, many red-listed. Curlew numbers have dropped 65% since 1970, with an estimated 250 pairs left in the south of England (below Birmingham). Consultation with the RSPB, BTO, curlewaction.org, Game & Wildlife Conservation Trust (gwct.org.uk), the Curlew Recovery Partnership (curlewRecovery.org), curlewlife.org, and wwt.org.uk is required. King Charles has an interest in curlew conservation (see The King's Series of National Nature Reserves) and should be consulted on this removal of a key breeding habitat. The Duke of Norfolk should also be consulted as his land is immediately adjacent to East Arkengarthdale Estate and will be impacted both in terms of species loss and amenity.
The bird survey carried out as part of FOR Scoping process is incomplete as Holgate Pasture – a known Curlew habitat immediately adjacent to site – was not covered. The survey data also appear to miss 2024 and 2025 figures. It is noted that data do not correlate with personal experience of local birdwatchers who report seeing flocks of Curlew in a single 10km walk in the area. This could be due to the survey years correlating with forest clearance on the Stang, or could show that surveys were carried out at the wrong time of year. Doubts over the accuracy/care taken in bird surveys to date raise serious concern over the ongoing nature of such surveys. No evidence has been presented that proposed mitigation strategies have been successful in the past when dealing with sensitive bird species
Survey data should be independently corroborated by a specialist team to ensure confidence in data presented. Dates/durations of surveys should be published, along with detail of who carried out the survey and how long they were on site on each date to ensure key breeding periods are accurately covered.
Around 130 species are currently known to use the site and surrounding Estate, at least 20 of these are red-listed species including the Curlew, Lapwing, Ring Ouzel and Starling. Hope, Kexwith and Holgate Moors will no longer be an open expanse of undisturbed habitat. The FOR team at a community consultation meeting advised that these birds use the moorland as it has "been managed in a particular way" and believe that if a similar area of land were managed in the same way, the birds would adapt and move to the new area. No replacement area of land is identified, or information provided on how birds would be directed to the new site. The Bird Disturbance Management plan detailed in the Scoping documents speaks of complying with legislation" informed by pre-commencement surveys and/or consultations with relevant bird recording groups" but no detail is provided. No evidence is presented that proposed mitigation strategies in terms of relocating have been successful in the past when dealing with sensitive bird species.
The Scoping document states that "<i>the application for development consent would include proposals for managing measures to avoid, reduce, mitigate or compensate for potential impacts on landscape and biodiversity resources and measures intended to provide biodiversity benefit</i>". It is already noted that this is a requirement of wind farm development and that no clear biodiversity benefits are detailed. Note that the presence of a habitat does not guarantee a functionally-viable habitat. Damage to the peat could render the moor a dead-zone as far as wildlife is concerned due to their reliance on suitable conditions.

"Baseline ornithology studies ...were commenced in April 2022 and are ongoing." This suggests continuity, which is not evidenced
Data from landowners beyond 2022 should be queried, as discussions around installation of a wind farm began at this date. There is a clear conflict of interest between evidencing red-listed bird activity on site while discussing wind farm opportunities with developers.
Surveys "commenced in April 2022, with two full consecutive years of surveys completed in February 2024". This is not two consecutive years - April 2022 to February 2024 is 22 months.
Curlew flights recorded over a 2 year period - 16. This is unlikely given that personal experience has shown a minimum of 20 flights in a half hour walk around the site and is contradicted by 8.3.47 which states "flocks of curlew, golden plover, lapwing and snipe were recorded within the survey area." . Other species are, on that basis, also assumed to be under-counted.
"overall level of sensitivity of an ornithological feature, adopted for the purposes of assessment, will therefore be based on a combination of the feature's NCI and conservation status, together with professional judgement". Again, this involves an element of subjectivity, which must be questioned when the surveyor is employed by the Developer.
Refers to bird species as "features" - our bird populations are held in great affection and this feels dismissive
Development in conflict with nearby protected zone. A Wild Bird General Licence Protected Sites zone (England) exists in Arkengarthdale. The proposal conflicts with ongoing projects to preserve and support wildlife in the area
Barn owls should not be scoped out on the assumption that they occupy lower land. Barn owls are frequently seen on Hurst Moor, in the fields adjacent to High Greenas Farm.
"baseline studies have not identified the site as being important for species susceptible to elevated risks to collisions with lit turbines ... as such, impacts ...relating to ...any other infrastructure lighting can be scoped out". The lack of collision risk with turbines and other lighting are very different.
9. Hydrology and Hydrogeology
Increased risk of flooding in lower areas. Part of the site drains to the Upper Swale Catchment area, directly impacting Arkengarthdale (via Arkle Beck), Reeth, Fremington and Grinton. It is acknowledged in the Scoping document that excavation of borrow pits could lead to increased flood risk and water pollution.
FOR Scoping documents Figure 9.2 – Flooding – does not include Arkengarthdale on the maps. Arkengarthdale is historically documented as prone to flooding and works that would increase drainage rate of the moors would exacerbate this. Flood risk to areas outside the immediate water assessment zone do not appear to have been considered as figure 3.15.5 of Scoping document states "Flood Risk Assessment (FRA) will be submitted...."
Flood risk to areas outside the immediate water monitoring zone require full assessment as catastrophic flooding in Arkengarthdale in 2019 affected hundreds of homes, farms and businesses and caused millions of pounds of damage. Assessment of risk also needs to consider the impact on Richmond and York, where flooding is already a regular problem. Increase in frequency or volume could result in additional economic damage to businesses in York, as well as higher repair costs and flood-management costs
2km is insufficient for flood risk assessment.
Water Quality/Supply e.g. disruption/changes to the water table (affecting homes/farms with spring water, borehole supplies and natural wells such as Frankinshaw Well). Olsens advise that monitoring of properties with private waters supplies will take place before, during and after construction. This is not guaranteed to prevent disruption, and there is no guarantee that any disruption would be reversible. There is no option for mains water

supply connection in the area so loss or contamination of supply would be life-changing for these residents/possibly fatal if arsenic is released into the water.
"Measures...including ...the control of surface run-off" are discussed including natural flood management measures. While natural flood management measures (e.g. leaky dams) would help with surface water, underground springs and changes to the water table cannot be controlled via surface measures. Detail of how underground water features will be managed is required.
Water course crossings are proposed to have a 50m buffer. This needs full assessment to gauge the risk of contamination from road materials/vehicle emissions/other to the water supply. Again, these will be minimised "as far as possible" – is this acceptable when dealing with a water course that ultimately supplies homes, farms, wells, streams and businesses in the area?
table 9-3 Receptor sensitivity must be considered high until it is established whether Frankinshaw Well is an actual well with open access to the public
what effect will mining investigation boreholes have on drainage? Will these turn the moor into a colander?
9.4.13 this needs to cover all effects, not just cumulative, given flooding in Arkengarthdale
9.5. Design, Mitigation and Enhancement Measures - "setting out principles for storage and handling of oils, fuels or other potentially polluting substances; " but if there is a spill how will these be prevented from getting into private water supplies
Water pollution – impact on vertebrates/wildlife. Water from the moor drains into numerous natural water courses which will be home to many aquatic species, including newts (a protected species). These could be impacted by run-off pollution from construction. Part of the moor system feeds directly to Brignall Banks SSSI via Gill Beck. North Yorkshire Sites of Importance for Nature Conservation (SINC) are identified on the site boundary (Low Easegill, Moredale Beck, Locky Wood, Rispey Gill) and Figure 15.1 in FOR Scoping documents shows ancient woodland (Locky Wood and Barningham Park) borders the site while Rispey Wood and Waitgate Wood both receive water run-off from the moor Section 10 discusses sulphide rich ores on the site, which are "likely to contain elevated concentrations of lead (Pb), zinc (Zn), cadmium (Cd) and arsenic (As). There is no discussion of the possible health impact (to humans and animals/birds) of heavy metal contamination on local water supplies.
Q9.2: It is not proposed to undertake any water quality sampling, establish groundwater monitoring points, surface water monitoring points or undertake leachability trials of any rock as there is published data that can be used to characterise baseline conditions and complete the impact assessment. What is this published data/how current is it/this does not protect water quality that feeds homes and businesses.
WFD survey needs to be redone - 2019 data cannot be considered current. Water from site already supplies numerous private water supplies.
"Measures...including ...the control of surface run-off" are discussed. Construction run off could pollute water courses and ultimately, render private water supplies unpotable. Note that this cannot be mitigated – there is no water main in the area that could be connected to.
"Longterm operation may alter groundwater recharge and subsurface flow pathways and may also influence groundwater quality. These changes can affect the long-term yield and water quality of licensed abstractions or private water supplies that depend on groundwater/Site-specific surveys will be carried out to assess impact on private water supplies. " How can surveys show what the long term impacts may be? These are unknown or would be mitigated against at this stage.

Construction resource requirements. Construction will require enormous amounts of resources – energy and water. How will this water and energy be supplied? Will this affect the local water table and/or local residential/agricultural/business supplies. Reservoir levels are regularly depleted over the summer months and consultation with local Water Authorities is required to assess the feasibility of supply.
scoping out "water dependent sites" - the entire peat moor surrounding the site is water dependent. Without it the blanket bog will dry out.
9.5.4 What does this mean? " If residual impacts persist, proportionate further actions, such as enhancement, remediation or compensation, will be identified to address those remaining effects."
10. Geology, Soils and Ground Conditions
fig 10.1 doesn't agree with other maps showing half site blanket bog, half heathland
Site boundaries shown in FOR Scoping documents are not consistent. The mining survey states the site is 490 Ha, while the Scoping Document says over 1000 Ha. The coal mining survey also has an incorrect site boundary.
Inferred fault - most have mineral veins. Likely to have been mined.
Disturbance of limestone next to peat (alkali vs acid)
A 2006 paper (Wallage et al) investigated peat restoration and concluded that "it may not be possible with current techniques to fully restore the hydrology and biochemistry back to their pre-drainage conditions " and that "marginal and degraded peatland habitats are more prone to significant and irreversible changes"
FOR quotes LandIS Soils mapping - their website states that "Soils mapping is not intended as a means for supporting detailed assessments, such as land planning applications or site investigations; nor should it be used to support commercial activities". "The north of the Wind Farm Array and the Haul Route Search Area are underlain by a small area of slowly permeable, very acidic upland soils with a peaty surface". This contradicts the assessment by CSX, who have this area flagged for peat regeneration work.
Low res survey done in 2024 - what restoration work has been done since that point, either under BNG umbrella or other?
SLR peat surveys 52% up to 30cm "therefore classified as organic rich soil deposits (i.e. not peat by Natural England).
The area around Byers Hill (extent unknown) was used as a firing range during the late WWII years (Riddle, pers comm) and it is likely that unexploded ordnance will be present across the site.
This section details sulphide rich ores on the site, which are "likely to contain elevated concentrations of lead (Pb), zinc (Zn), cadmium (Cd) and arsenic (As). There is no discussion of the possible health impact (to humans and animals/birds) of heavy metal contamination on local water supplies.
"reusing excavated peat in a manner to which it is suited" - what does this mean? Peat has historically been used as compost (another potential income stream?)
Removal of peat moorland - mitigation
The FOR team advised that peat would be relaid in "pools" after removal, with the water table being raised to ensure moisture levels are retained. Peat re-laying may provide limited surface restoration or visual mitigation, but it cannot replicate the ecological, hydrological, or carbon storage functions of intact peatland. Disturbance and excavation result in irreversible carbon loss and long-term degradation, with restoration uncertain, incomplete, and occurring over decades rather than within project timescales. Evidence that successful relaying is possible as a mitigation strategy without CO2 release needs to be provided.

Natural England should be asked about the status of land funded through their statutory credit pilot project as Barningham Estate, via a sub company called Climate Solutions Exchange Ltd (CSXCarbon.com), has been "involved in BNG since 2019, as at first a participant in Natural England's ... project".

The map on <https://csxcarbon.com/2021/08/01/restoring-peatlands-using-artificial-intelligence/> shows the area immediately to the north of the site, suggesting this has either already been restored, or is targeted for restoration via the BNG system. This area is within 100m of at least 3 turbines, with risk of peat contamination from construction work. Does this land, as a BNG area, have added protection through the Government BNG scheme? It seems odd that construction could be planned immediately adjacent to BNG land.

The CSX Carbon LinkedIn page shows a map of available BNG land, which includes the proposed site. There is a clear conflict of interest regarding use of the site.

The CSX website (<https://csxcarbon.com/2021/08/01/restoring-peatlands-using-artificial-intelligence/>) states that "Whilst it is clear that restoring areas of poor condition to moderate or good would provide a significant uplift to our annual carbon account, what is less clear is the process in qualifying the condition of our moorland. And frustratingly the carbon emittance/sequestration figures proposed by Artz et al. do not seem to correspond with the International Union for Conservation of Nature (IUCN) figures, which underpin the Peatland Code." This page details the shortage of specialist peatland ecologists and the time-intensive and costly nature of survey. Their solution is a LIDAR based drone/AI system to produce an assessment of current condition.

Evidence is required to show, firstly, which method was used to assess peat depth and condition on the site (physical or remote/drone) and, if remote/drone assessment was carried out, what benchmarking and validation methods were used to prove this is a valid replacement for physical testing.

Permanent damage to the site. There is no commitment to remove the turbine bases at the end of the wind farm life. The moor cannot be reinstated to its former condition as a result of installed concrete, peat removal and ongoing pollution from concrete deterioration.

<https://publications.naturalengland.org.uk/publication/43010> discusses peat and summarises that "Developing a conceptual model of blanket peat is an essential step in understanding the potential impacts of wind farm development in these areas. In particular:

- It is clear from the literature review that peat (blanket peat being no exception) differs from other materials for which hydrological models have been developed.
- Peat is strongly anisotropic; its properties vary over short distances, both vertically and horizontally.
- Peat has little cohesive strength, being largely composed of water, and can mass flow in its semi-fluid state.
- Peat can erode as smaller particles when subject to the energy of moving surface water (ditches, streams), dissolved organic carbon is also lost from peat bodies via drainage waters.
- Fast water movement in ditches and streams cause head-ward erosion.
- Its biodiversity value is dependent on maintaining its original (as laid down) structural integrity and a high water level." and that site selection should avoid "any adverse effects on the integrity ...of ... national wildlife importance sites ... key habitats of species listed in Annex IV of the Habitats Directive; or On hydrological processes which might have an adverse impact on the conservation of wildlife, geomorphological or geological features."

The report also recommends early consultation between developers and nature conservation organisations "in order to consider the ecological value of the site (whether

designated or not) and to safeguard the hydrological process which maintain the groundwater dependant ecology of blanket peat". The assessment of significance is based on "... the likelihood of an impact and how the wind farm would affect the peat (in comparison with no wind farm at the location)" noting that "in general peat is very sensitive to changes" and the Irish Wind Energy Association (2008) recommends that the EIA "should include [assessment of] ... Slope stability; Dewatering effects; Sediment, erosion and nutrient control; Impact of tracks and drains on hydrology and ecology; Re-vegetation measures" as well as an "assessment of cumulative impacts and impacts outside the site boundary" noting that "The geographical boundary .. may need to be much larger than the development site" and that "the unusual properties of peat and its variable nature mean that geotechnical techniques developed for mineral soils should be applied cautiously on peat, as the physical properties of peat differ from other soils and sediments. These differing properties should be accounted for in working within a peat environment. "

11. Access, Traffic and Transport

Improved access can also lead to increased illegal use of moorland, including bogs, by off-road traffic

11.5.2 - Borrow pits would turn the moor into an open-cast quarry, with associated dust and disturbance, removing an unspecified amount of substrate for construction. To call these "borrow" pits is misleading, as the aggregate used in road construction etc will not be returned to the pits, but will remain in situ on the moor. Quarrying will also cause associated disruption for residents in terms of noise, dust and increased road use.

Pollution from vehicles. What plans are in place to offset pollution from the thousands of diesel vehicles that will be used in construction, in what is currently a clean air site?

11.3 accident data. This information needs to be provided by Highways

A66 is major trunk road with heavy usage. Delays when transporting e.g. turbine parts will cause chaos

Use of the A66 - bank holidays and school holidays are particularly busy. It is not 10% either way and assessment needs to factor in these seasonal peaks. The A66 sometimes appears to be at capacity on the single carriageway sections with traffic often backing up at the entrance/exit to Mainsgill Farm Shop.

The "network" in question is the A66, not just the side roads, and is, at times, at or close to capacity. Assessment at holiday periods needs to be included for "worst case scenario" modelling.

Local authorities are aware of accident hot spots - increased traffic will increase risk but "what plans the authorities have to address those rates". Devolution of responsibility.

If traffic would use side roads, free roaming livestock and wildlife must be considered as Very High Sensitivity given their unpredictable behaviour around cars.

Cumulative effects are more around increased volume and size of loads + nature of the roads + likelihood of other users actively avoiding the A66 due to excess traffic

"Professional judgment will be applied to estimate the routes taken by vehicles travelling to and from the project. .. Informed by a review of where potential suppliers ... are located locally and where there are large centre of population from where other supplies and staff may originate". **If alternative routes to site are to be proposed/considered, the consultation process needs to make this clear to the public. Current plans refer only to the A66.**

Are proposed roads feasible? Figure 7.4.1 of FOR Scoping documents shows mapped areas of "No Survey Access Area" – one section appears to completely block the access route for new road. Another appears to include privately-owned farmland out of crop production. Clarification needs to be sought on the nature of this land.

The site has been identified as "Right use, right place" on the basis of:

• *proximity to major transport routes (A66, A6108, A1(M)), enabling feasible delivery of turbine components and construction materials;*

The site is directly accessed **from all sides** via minor roads - none of these roads are suitable for heavy construction traffic. A member of the Parish Council was advised that "multiple alternative routes to site" would be required. There is no mention of this in the Scoping Document. Any routes used to travel to site via Marske or Grinton/Fremington/Reeth/Arkengarthdale involve steep, narrow minor roads already subject to repeated subsidence, physical width restrictions (cattle grids and bridges), heavily wooded sections and hairpin bends.

Use of these minor roads present risks to (but not limited to) tourism businesses, tourists, cyclists and horse riders (Dales Bike Centre and Arkle Moor Riding Centre are both on the route), children playing on the Green in Reeth, free-roaming livestock in Arkengarthdale, and brings associated noise and nuisance to residents from heavy early morning traffic based on the proposed 7am to 7pm operating hours.

If these routes are to be used, it is likely that significant new infrastructure would be required to facilitate the vehicles required. This could mean new roads (significantly wider than existing), new bridges (to prevent damage to listed structures) all within the Yorkshire Dales National Park. The impact of such work would require careful assessment to prevent disruption to school bus routes, commuter traffic, tourist use, MOD training and accessibility to the National Park, and to ensure that works do not have a negative effect on the visual aspect of the YDNP. Consultation with North Yorkshire Highways, the Yorkshire Dales National Park and the Ministry of Defence is required (the latter as work to the Cordilleras route would impact MOD activity).

Increased road maintenance. Extraordinary use of local minor roads will lead to increased highway maintenance requirements. It is reported that FOR have previously failed to upgrade roads prior to use, repair during use, or carry out repair after construction. Strict conditions need to be applied for use and repair of local roads, and an extensive bond taken to ensure works are carried out before, during and after construction to maintain roads during use and return to a good state of repair at the conclusion of construction. Agreement needs to cover all proposed routes to and from site, including the A6108 and B6270 (which suffers from repeated subsidence). Increased road maintenance requirements are likely to lead to inflated council tax bills for local residents.

The A66 is currently due to be upgraded to dual carriageway. These works will cause significant traffic issues, likely to push traffic onto the minor side roads around Newsham and Barningham which are treated as "rat runs" when the A66 is blocked.

Unsuitable roads (road safety)

Figure 5.9 of the FOR Scoping documents clearly shows that all roads in the immediate area around site are minor roads - additional traffic loads will increase the road safety risk to users (including pedestrians, cyclists and horse riders).

Additional construction lorries will increase road safety risks to residents and wildlife. Assuming the A6108 is to be included, with onward travel towards site via the B6270, the settlements of Grinton, Fremington, Reeth, Arkle Town, Langthwaite and Barningham all need to be risk assessed. For example The Dales Bike Centre at Fremington is very busy with cyclists and visitors and additional road traffic would increase the risk to these users. The village greens in Reeth and Newsham are often used by children playing football, and increased traffic presents a clear risk to their safety. Livestock roams free outside of Reeth, through Arkengarthdale and over the Stang road. Increased road traffic presents significant risk to these animals, and to the associated losses experienced by the farmer.

How will AILVs get through Newsham with overhead cabling etc? What is the proposed back up route to site for these loads?

Natural England report NECR032 (Investigating the impacts of windfarm development on peatlands in England) 2010 notes that "initial width of wind farm tracks (up to 6-7m)" and that "cranes are often delivered to site in pieces.... But may be moved as one unit (weighing up to 200 tonnes). Note that, at the point this was written, turbines were significantly smaller - will tracks and max loads be proportionately increased, and how will damage to the peat moorland be prevented?
12. Noise and Vibration
fig 12.1 Arkengarthdale not included for noise - despite known amplification effect
Quotes Figure 13.1 - this does not exist in the supplementary Figures document
Residential – noise disruption. Noise from both construction works and movement of materials and personnel to and from the site will cause disruption to residents. The surrounding area (particularly Arkengarthdale) experiences very little disturbance from roads or agriculture. MOD activity (RAF training – firing on the ranges is not heard in Arkengarthdale), although high impact, is infrequent and short-lived. Constant construction noise would be a serious disruption to the area. Background noise levels in Arkengarthdale are around half the national average - road traffic noise is ~29dB (Very Quiet) and not a "greater contributor to background noise levels".
Residential – noise pollution. Noise from the turbines is likely to affect residents both to the North (in Barningham and Newsham) and to the South in Arkengarthdale. Figure 12.1 of the FOR Scoping documents does not include Arkengarthdale on the Noise and Vibration maps, despite there being a known amplification effect in the Dale (personally experienced at Raw Moor Farm). The following houses must be fully assessed for noise amplification effects, during the day, and at night, with windows open and from the gardens: Raw Bank House, Rawcroft Farm, Raw Moor Farm, Bouldershaw Farm, Far Gill, Gill House, New House Farm, The White House, Yellow Houses
While it may be considered that infrasound has no effect on physical health, the mental health effects of living in such close proximity to 200m turbines cannot be underestimated. Residents may experience depression or wish to move house as a result of the development.
13. Aviation, Radar and Telecommunications
The Duke of Norfolk's Estate must be scoped in, as the Duke and (royal) guests are known to arrive by private helicopter
14. Shadow Flicker
Who would assess any complaint? Is this done independently?
15. Air Quality
fig 15.1 incomplete. Inclusion of Barningham and Newsham ~3km from site boundary. Needs to also include Helwith, Hurst, Washfold, Eskeleth, Langthwaite, Arkle Town, Booze and isolated houses in the same area.
Construction dust assessment needs to be wider ranging. The area is windy, so dust created would travel far further than 50m from the site. This would affect residential amenity - use of gardens
16. Carbon and Climate Change
The proposal is presented as a key contributor towards Net Zero climate objectives. The Scoping document states: <i>The Project would result in emissions savings of approximately 202,963 tonnes of carbon dioxide (CO2) per annum, compared to a fossil fuel mix of electricity.</i>
The construction work would involve substantial carbon emissions from large-scale excavation and construction work (as above), A full and transparent whole-life carbon assessment is essential to include:
· Embodied carbon from construction materials (including concrete and steel)

· Emissions from the production of turbine parts
· Emissions from transportation of materials from overseas and within the UK
· Emissions from all construction activity including quarrying of "borrow pits" and use of the moor as a construction site with associated infrastructure
· Emissions associated with peat disturbance and habitat loss
Emissions from operational activity
· Emissions from recycling of turbine parts at the end of life
A clear demonstration of the "green" energy was requested but could not be provided. The public would like to see these calculations to establish that the proposal really is green energy.
Peatland and "other soils" are highlighted as a top conservation priority, with the need to "restore ecosystem function on our moorlands" and address problems created by "track construction".
Construction would cut through peat moorland, releasing an unspecified amount of CO ₂ , and removing thousands of m ³ of peat and valuable soils. On this basis, the proposal fundamentally conflicts with the objectives of local regeneration schemes.
17. Socio-Economics
Job creation The FOR website describes the creation of new jobs as part of the development. Only "dry stone walling" is specifically stated. Detail of "generation of employment" is not within the sectors where people currently work - i.e. hospitality and farming. Discussions with the Olsen team suggest that a small number of "well paid" jobs (turbine engineers) will be created, to be filled as apprenticeships. Suggestions that residents finding themselves unemployed from e.g. hospitality roles should retrain as turbine engineers are simplistic - most are not young people, many have no means of transport to access college, and may struggle to undertake such training. Already-trained maintenance engineers are unlikely to be employed from the local area, as these are specialist roles, filled by existing contractors from across the UK and EU. There were also mixed messages - Euan Hutchinson (Development Director UK for FOR) stated at the community webinar that there would be a "permanent team on site" for general maintenance work once construction was complete. This is contradicted by the Scoping Document which states that "wind turbines would operate automatically and would be monitored remotely" and "during operation there would be only occasional visits by maintenance or inspection staff"
Loss of farmland and the ability to farm. Farms and properties adjacent to the site (within 3km) may be rendered uninhabitable by turbine noise/flicker or become unfeasible to run as a business due to land loss. Farmers have operated these farms for generations and will not have, or are likely to want, a "back-up plan" for employment.
Economic assessment needs to be more closely focused on the areas immediately around the site - i.e. Barnard Castle, Reeth and Arkengarthdale. Local businesses in Arkengarthdale and Swaledale (particularly Reeth, Fremington and Grinton) are dependent upon both tourism and shooting income. Visitors to the Dales come to the moors to enjoy wide open spaces away from industrialisation. Tourists may go, and stay, elsewhere – affecting accommodation providers, hospitality and shops in the area and leading to job losses/business closures. Many businesses in the area are already "running lean" due to rising costs, and loss of income will lead to staff reductions or business closures.
Many people beyond "working age" are still working - farmers never retire. High dependence on hospitality business. What does "local area" cover?
Loss of tourism/ Visual impact from YDNP, NPNL/UGG. The tranquility and remoteness of the area will be affected by turbines. For example, FOR estimate that 15 turbines will be visible from the main road through Arkengarthdale, with all 23 visible from higher ground within the YDNP such as the flanks of Calver, Bouldershaw Road, Great

Pinseat etc. The proposal would alter the open moorland panoramas, removing the feeling of remoteness experienced on the tops of moors where it is possible to have a 360o view with virtually no man-made structures, and none standing 200m tall.
Visual Impact across the YDNP needs to be assessed, including impact on key walking routes such as the Three Peaks which is walked by thousands of people every year. This is absent from the FOR Scoping documents. The NatureScot guidance points out that <i>"A viewpoint is by its very nature static whilst views tend to be experienced on the move as well as when stationary"</i>
loss of shooting revenue Consultation is required with the Duke of Norfolk's Estate (owner of West Arkengarthdale Estate) as the turbines will be a dominant feature of his estate. Shooting parties may choose to visit Reeth or the Bolton estate instead as shadow flicker could affect the ability to shoot. This, again, will have significant financial impact on the area as shooting parties contribute a great deal to the local economy. This is also a loss of historical/traditional activity in Arkengarthdale, as shooting is a long-established pastime.
Loss of employment. The Barningham estate shooting rights are let to a sporting tenant and the Arkengarthdale estate is managed as a shooting estate. If the moorland is used to house turbine there will be no requirement to manage the land, particularly during the construction phase, and no shooting parties visiting the area. This is likely to lead to a loss of employment for gamekeepers, housekeepers, hospitality staff etc – completely changing the nature of employment in the area.
The Olsen team stated that around £5m was added to the local Dunbar economy during the construction of Crystal Rig. This site is significantly larger than Hope Moor (around 4 times the size) and, reducing this proportionately, suggests around £1.25 million may be added to the local economy. This is unlikely to make up a potential shortfall caused by a drop in tourism and would only be experienced as a benefit during the construction phase as the money comes through supply chain demands, few of which would feed into the very local (Reeth and Arkengarthdale) economy which would be most impacted by a fall in tourism. Attempts to limit supply chain expenditure already include the use of "borrow pits" on site to access unspecified amounts of aggregate. The document also states that "... it is unlikely that the construction workforce would put pressure on the local community facilities given the nature of these services and limited amount of accommodation available" , effectively stating that money through the supply chain will not go to hospitality providers in the area.
The scoping document discusses "access to skills training for local farmers and residents" - further detail is required to show the kinds of skills training that would be available, evidence that this has taken place and been successful in securing employment for residents in similar areas. How will these skills compensate farmers for loss of grazing land?
Scoped out - reduced levels of physical activity and enjoyment of the outdoors. The document details public rights of way "which may be affected by ...loss of visual amenity during construction". Loss of visual amenity will be permanent during the construction and operational phases. The turbines will be visible from world-famous walking routes such as the newly upgraded Coast to Coast National Trail, the Pennine Way, Three Peaks and the Herriot Way. This will impact views from the routes and may deter future walkers from undertaking the challenge. A study by Mountaineering Scotland showed that 90% of walkers/hikers preferred not to see, or avoided areas with, wind turbines.
The Scoping Document details security lighting during the construction phase. This would affect Dark Skies Swaledale and Arkengarthdale have Dark Skies status and visitors are privileged to view the Milky Way and Aurora on a regular basis. This would be impacted by the scheme, with Aviation lighting visible from across the YDNP and NPNL/UGG.
18. Other Environmental Topics

How will the blades be removed and are they recyclable? If so, how will this be done, where and at whose expense? If they are not recyclable, how will they be disposed of? Will they go to UK landfill? Who will bear these costs?
Figure 18.1 to 18.6 shows how remote the site is from all waste infrastructure. There is no attempt at quantification of waste. Transfer to a waste facility in e.g. Sheffield or York would involve a minimum 2 hour drive each way, with associated pollution from diesel vehicles (or from electricity use if EV are used). Without an idea of quantity it is impossible to say what the impact will be, or how to mitigate.
what are the 287,900 m3 of "excavation wastes"? Peat and soil should be retained on site for maintenance and relaying once the site is operational (e.g. to cover crane pads as suggested by the Olsen team (webinar June 2026))
18.3. Human Health
The archaeological assessment as part of Scoping, discusses the Swaledale and Arkengarthdale Barns and Walls conservation area: ... from those areas which fall within the ZTV on the opposing reaches of the dale, [as] views would be focused downwards along the valley to the north-west and south east, with wind turbines forming a minimal distraction from the ability to appreciate and experience the historic aspects of the landscape. Only very small areas relative to the entirety of the designated area would have any visibility of wind turbines, with the majority of the conservation area falling outside of the ZTV. As the owner of Raw Moor Farm, we sit just below the main Reeth/Arkengarthdale Road. We are predicted to sit in the ~15 turbine section of the ZTV. Our views from the garden, which we enjoy at all times of the year, are not "focused downwards" but are holistic, appreciating the full aspect of sky/ridgeline and moors. The alignment of our home is such that our view is directly across Arkengarthdale to Sleil Gill, meaning the turbines will be immediately visible on the skyline. The impact upon our quiet enjoyment of our home and the surrounding beauty, tranquility and sense of remoteness will be significant, as the turbines are as tall as Fremington Edge.
Turbine blades are known to shed PFAS (forever chemicals) which have known adverse environmental effects with impact on soil and water, affecting agriculture (soil chemical changes leading to reduced crop yield), aquifers (impacts on flora and fauna including developmental abnormalities and reduced reproductive success) and ecosystem level consequences. Health effects in humans including cancer, immune system impairment, neurodevelopmental disorders, endocrine disruption, cardiovascular risk and mental health problems. Effects are disproportionately high in rural communities who may be dependent on contaminated water supplies, leading to socio-economic implications through increased healthcare costs, reduced productivity and loss of property value. Assessment of structural integrity of the blades is required, with a full degradation and emissions risk assessment undertaken with sign off from the Environment Agency. This should examine possible impacts on local water courses, fauna, flora and humans.
What provision is being put in place re emergency response plan in case of fire? Local fire crews (Barnard Castle, Reeth, Colburn, Leyburn, Hawes) are retained (i.e. not full time, therefore a response is not guaranteed).
Reduced moorland management will result in plant species, normally controlled through moorland burning practices, growing unchecked. As seen repeatedly over recent summers, our moors are a "tinderbox" with a single spark having the potential to start a wildfire. Unmanaged moorland has no built-in fire breaks – fire can travel at speed across great distance, setting into the peat and creating uncontrollable burns below ground level. Should the moor become, as predicted by the Olsen team, more easily accessible to the public and a form of tourist attraction, it is likely that the usual issues with public use would arise, including the abandonment of disposable BBQs after use. As seen at Fylingdales moor, a spark can lead to a fire that causes irreparable damage to the peat and present

significant risk to properties in the locality. The site's remoteness and inaccessibility to water supplies further increases risk of a fire burning out of control. Roads are not effective fire breaks in these situations - the fire jumps them.
The area around Byers Hill (extent unknown) was used as a firing range during the late WWII years (Riddle, pers comm) and it is likely that unexploded ordnance will be present across the site.
Not discussed
It is unclear why Hope Moor has been identified as the best site for a NISP, given its size and proximity to protected landscapes to the South (YDNP), West (NPL), East (MOD land) and North (residential areas including conservation area). The Olsen team advised that the site had been chosen due to "good wind". Looking at the Global Wind Atlas, sites with similar levels of wind are available nearer to the Northeast coast (nearer to Hartlepool) which are closer to national grid connections (including a main link to Norway) and existing road infrastructure.
No information is provided to show which other sites were considered and dismissed in favour of Hope Moor.
Effect on farmers whose sheep are hefted to long-standing defined areas. Sheep cannot just be moved around as variable Pb (lead) levels in vegetation can affect their health.
Effect on house prices: In National Parks, buyers explicitly pay a premium for uninterrupted visual amenity and "unspoiled" heritage landscapes. Arkengarthdale relies heavily on a market of affluent retirees, second-home buyers and holiday-let investors, all of whom have the mobility to look elsewhere if they feel a view has been "industrialised". A study by RICS showed that 60% of surveys reported that wind farms decrease the value of residential properties when the development is within line of sight and 67% noted market slowdown begins the moment a formal planning application is publicised, driven by buyers' "fear of the unknown". A study by LSE found that large wind farms could reduce property values by up to 13% within a 2km radius if they significantly altered a prized countryside view. Although Arkengarthdale is more than 2km from the site, the proposal will be highly visible and is likely to affect property values.
Section 10 discusses sulphide rich ores on the site, which are "likely to contain elevated concentrations of lead (Pb), zinc (Zn), cadmium (Cd) and arsenic (As). There is no discussion of the possible health impact (to humans and animals/birds) of heavy metal contamination on local water supplies.
The proposal, at present, seems to depend on surveys, documents and assessments that will be produced, and is heavily dependent on data/evidence not yet available.

Receptor Comments 4 Scoping Report

Submission for Human Health to be included as a standalone topic for assessment

Date: 23 June 2026 at 16:27:11 BST

Human Health has been entirely scoped out of the FOR Hope Moor submission ref **EN0110038**

I would request that this be amended and included within the scoping process under **Human Health as a standalone topic within the Environmental Impact Assessment.**

The Scoping Report proposes to deal with health-related effects indirectly through other chapters, including Noise and Vibration, Landscape and Visual, Shadow Flicker, Traffic and Transport, and Socio-Economics. This is not sufficient. Human health is not merely a secondary consequence of technical impacts; it is a receptor in its own right and should be assessed holistically.

1. Human Health should be scoped back into the EIA

The report acknowledges that environmental noise is one of the leading environmental risks to physical, mental health and wellbeing, including annoyance, sleep disturbance, cardiovascular effects and mental health impacts. It also acknowledges that some residents near turbines report sleeplessness and stress.

Despite this, the report proposes not to include a separate Human Health chapter. This creates a risk that the cumulative health burden on local residents will be fragmented across separate technical chapters and never properly assessed as a whole.

A standalone Human Health Assessment should be required to consider the combined effects of:

- * operational turbine noise;
- * infrasound and low-frequency noise;
- * amplitude modulation;
- * shadow flicker;

- * aviation lighting;
- * loss of tranquillity;
- * loss of access to wild spaces;
- * construction disturbance;
- * anxiety and stress associated with long-term uncertainty and landscape change.

2. Infrasound, low-frequency noise and amplitude modulation should not be scoped out

The report proposes to scope out operational infrasound, low-frequency noise, tonal noise and excess amplitude modulation. This is not acceptable.

The report relies heavily on current guidance and states that these matters are not required to be assessed at the planning stage. However, the fact that an issue is difficult to predict does not mean it should be excluded. Indeed, the report itself accepts that amplitude modulation is complex and cannot reliably be predicted at planning stage. That uncertainty is precisely why it should remain within the assessment, not be removed from it.

The public concern around infrasound and low-frequency noise from large modern turbines is growing. The proposed turbines at Hope Moor are 200 metres in tip height. It would be a high-risk strategy to exclude these issues from the EIA when the evidence base, public concern and potential for future challenge are all developing.

At minimum, the EIA should include:

A review of the most recent evidence on infrasound, low-frequency noise and amplitude modulation;

A precautionary assessment of potential health effects;

A baseline monitoring where appropriate;

A consideration of sensitive receptors, including residents, older people, children, people with existing health conditions and those particularly vulnerable to sleep disturbance;

Clear mitigation and enforceable monitoring commitments;

A clear and fair complaints and independent investigation procedure if the development becomes operational.

Keeping infrasound and low-frequency noise outside the EIA risks leaving a significant gap in the assessment. It may also increase the likelihood of future legal challenge if residents later experience adverse effects that were not properly assessed during the planning process.

3. Wild spaces, wellbeing and outdoor health benefits should not be scoped out

The report also proposes to scope out reduced physical activity and enjoyment of the outdoors as a standalone health matter, suggesting that this can be dealt with through traffic, access and landscape assessments. This is too narrow.

Hope Moor is not simply an access route or a visual receptor. It is a wild open landscape used for walking, quiet recreation, reflection, nature connection and mental wellbeing. The health value of such spaces cannot be properly assessed only by measuring footpath diversions or visual impact.

The Scoping Report itself recognises that physical activity is an important determinant of health and that loss of visual amenity can affect how people use outdoor space. It also acknowledges that landscape helps shape community identity and belonging. These are clearly health and wellbeing issues and should therefore be assessed within a Human Health chapter.

This is particularly important given the proposed site Hope Moor residing in the majority of North Yorkshire and the direction of public policy in North Yorkshire. The Mayor of York and North Yorkshire has recently invested significant public funding into programmes promoting health, movement, activity, mental wellbeing and connection to the outdoors. The Combined Authority has also highlighted nature-based approaches to improving health outcomes, reducing isolation and supporting prevention.

It is inconsistent to recognise the value of wild spaces for public health through public investment, while allowing a major infrastructure project to scope out the potential loss or degradation of those same wellbeing benefits.

4. The health value of wild landscapes is supported by evidence

There is strong and growing evidence that access to natural environments improves mental wellbeing, supports physical activity, reduces loneliness and contributes to community resilience. North Yorkshire's own Natural Health Service pilot reported measurable improvements in mental wellbeing, social wellbeing, physical wellbeing and loneliness through structured engagement with nature.

This means that the loss of tranquillity, remoteness, dark skies and wild character at Hope Moor should be assessed as a potential public health impact, not dismissed solely as a landscape or access issue.

5. Requested change to the Scoping Opinion

I request that the Secretary of State requires Human Health to be scoped back into the EIA as a standalone chapter.

The Human Health Assessment should include:

1. A full assessment of operational noise, including infrasound, low-frequency noise and amplitude modulation.
2. A cumulative assessment of noise, shadow flicker, lighting, visual intrusion and loss of tranquillity.
3. A specific assessment of impacts on sleep, stress, anxiety and mental wellbeing.
4. Assessment of impacts on use of wild spaces, outdoor recreation, physical activity and nature connection.
5. Consideration of vulnerable groups, including children, older residents, people with disabilities, people with existing health conditions and people dependent on local access to outdoor space.
6. Clear mitigation, monitoring, complaint investigation and enforcement mechanisms.
7. Consideration of whether the proposal conflicts with regional public health policy promoting access to nature, outdoor activity and wellbeing.

In conclusion, Human Health should not be fragmented across other technical chapters. The potential effects on residents, visitors and users of Hope Moor are sufficiently important, complex and cumulative to require a dedicated assessment within the Environmental Statement.

References

1. Hope Moor Wind Farm Scoping Report, Chapter 12: Noise and Vibration.
2. Hope Moor Wind Farm Scoping Report, Chapter 18: Other Environmental Topics – Human Health.
3. Hope Moor Wind Farm Scoping Report, Appendix 3A: Draft Register of Environmental Actions and Commitments.
4. York and North Yorkshire Combined Authority – Moving Forward mayoral investment programme.
5. York and North Yorkshire Combined Authority – Natural Health Service for North Yorkshire.
6. North York Moors National Park Authority – Measuring Health and Wellbeing Impact Report.
7. UK Health Security Agency – Improving Access to Greenspace Review.
8. NHS England – Green Social Prescribing.
9. World Health Organization – Environmental Noise and Health.

Key supporting source links: the Scoping Report proposes to scope out infrasound, low-frequency noise and excess amplitude modulation from operational noise assessment and asks consultees whether they agree with scoping those matters out. It also scopes out reduced outdoor activity/enjoyment and community identity from a separate Human Health chapter, relying instead on landscape, traffic and access chapters.

For external evidence, the York and North Yorkshire Combined Authority says the Mayor's "Moving Forward" programme includes "Connected to the Outdoors" and a £2.75m Movement, Activity and Sport fund ([yorknorthyorks-ca.gov.uk][1]). Its Natural Health Service pilot reported improvements in mental wellbeing, social wellbeing, physical wellbeing and loneliness from structured engagement with nature ([yorknorthyorks-ca.gov.uk][2]). The North York Moors National Park reports that every £1 invested by DEFRA generated around £7 of health and wellbeing benefit ([northyorkmoors.org.uk][3]).

[1]: <https://yorknorthyorks-ca.gov.uk/7million-mayoral-investment-made-to-get-the-region-moving-forward/> "£7million mayoral investment made to get the region moving forward > York and North Yorkshire Combined Authority"

[2]: <https://yorknorthyorks-ca.gov.uk/north-yorkshire-leading-the-way-with-uks-first-protected-landscape-led-natural-health-service/> "UK's first Protected Landscape-led Natural Health Service "

[3]: <https://www.northyorkmoors.org.uk/health-and-wellbeing/measuring-health-and-wellbeing-impact-report> "Measuring Health and wellbeing impact report | NYMNP"

Receptor Comments 5 Scoping Report

Response to the Hope Moor Wind Farm Scoping Report – June 2026

Date: 24 June 2026 at 14:45:38 BST

The current Scoping Report in my opinion, provides insufficient evidence to demonstrate that the geological, mining, karst, hydrogeological and ground stability risks associated with the proposed Hope Moor Wind Farm have been fully identified or appropriately scoped for assessment.

Whilst the report recognises the presence of historic lead mining, extensive peat deposits, limestone geology, faulting and areas of potential instability, the proposed scope appears fragmented and does not adequately address the interaction between these environmental systems. In particular, insufficient weight appears to have been given to the combined effects of: historic lead mining and associated contamination; karst limestone geology; sink holes and shake holes; deep peat deposits; groundwater pathways; private water supplies; surface water catchments; slope stability and erosion risks under future climate conditions.

These issues are interrelated and should be assessed as part of an integrated geological and hydrogeological assessment rather than being considered in isolation.

1. Historic Mining Legacy (see attached Ordnance Survey maps of mining incidents for the proposed wind farm site dated 1895 and 1911) I can supply hard copies should you so wish.

The Scoping Report acknowledges the presence of recorded lead mine entries and historical mining activity within the study area. However, historical mapping of Hope Moor, Barningham Moor, Holgate Moor and Keswick Moor demonstrates that mining activity was widespread and includes: old lead mines; old coal mines; old shafts; old quarries; hushes; spoil areas; associated drainage features. (Refs. 2, 3, 4)

Whilst the Scoping Report acknowledges that historical lead mining was extensive throughout the wider study area and records 31 mine entries within the Wind Farm Array, much of the detailed mining discussion appears to rely upon Appendix 10A: Kexwith Moor Mining Risk Assessment. Historic mapping demonstrates that old lead mines, old coal mines, shafts, shake holes, hushes and associated workings occur across Hope Moor, Barningham Moor and

Holgate Moor as well as Kexwith Moor. It is therefore unclear whether the wider mining legacy across the entire development area has been characterised with sufficient detail to support the conclusions reached at the scoping stage. (Refs. 2, 3)

The mapping indicates that these features are distributed across a much wider area than the limited focus presented within parts of the Scoping Report.

Importantly, historic mining records are rarely complete. Many workings pre-date modern surveying standards and some may have been lost, infilled or obscured by peat accumulation.

The report itself acknowledges the likelihood of unrecorded shallow workings. However, it is not clear how uncertainty relating to unidentified workings, shafts and voids will be incorporated into the assessment.

The Environmental Statement should therefore include: a comprehensive mining legacy assessment; review of historical mapping; LiDAR analysis; geophysical investigation; intrusive ground investigation; assessment of unrecorded workings; consideration of cumulative mining-related ground instability. It is important that this is not limited solely to Kexwith Moor and the scoping report is broadened to include the whole proposed site. It is also likely that there are numerous unrecorded workings which the Scoping report comments upon, however there is no assessment to rule this out completely.

I request that the complexity of this entire site needs be assessed, fully understood and amendments made to the scoping report by the developer.

2. Karst Limestone, Sink Holes and Shake Holes

The underlying Carboniferous limestone geology introduces additional complexity.

The historic mapping demonstrates numerous shake holes across Hope Moor, Barningham Moor, Holgate Moor and Keswick Moor. These features should not automatically be assumed to be mining related. Many represent natural karst landforms associated with dissolution processes within limestone bedrock. (Refs. 2, 4, 5, 6)

Karst systems are characterised by: fissures; underground drainage routes; cavities; sink holes; solution features; groundwater connectivity.

These systems can extend well beyond the locations of recorded surface features and are often incompletely mapped. (Refs. 5, 6)

The Scoping Report does not currently provide sufficient evidence that the distribution and extent of karst features have been adequately characterised.

Given the scale of the proposed development, a dedicated karst risk assessment should be undertaken.

This assessment should consider the following: natural sink hole development; interaction between mining and karst features; groundwater pathways; foundation stability; drainage impacts; climate resilience.

The British Geological Survey identifies changes in loading, excavation, altered drainage patterns and construction activities as factors capable of influencing sink hole development in soluble rock environments.

3. Foundation Construction and Ground Disturbance

The proposed turbines are expected to reach approximately 200 metres to blade tip and will require substantial foundations, crane hard standings, access roads and underground cable infrastructure. (Ref. 2)

The Scoping Report currently provides insufficient information regarding: foundation depth requirements; excavation volumes; bedrock conditions; interaction with peat deposits; interaction with historic mine workings; interaction with karst features; likely concrete volumes. (Refs. 2, 3, 5)

The assessment should not simply demonstrate that foundations can be engineered. It should also assess the environmental consequences of constructing them.

In particular, the Environmental Statement should explain: how competent bearing strata will be identified; whether blasting, rock breaking or piling may be required; whether deeper excavations may be necessary due to peat thickness or unstable ground; how groundwater pathways may be affected; whether additional concrete requirements alter carbon calculations.

These matters have direct implications for peat disturbance, hydrology, carbon balance and ecological impacts.

4. Peat, Hydrogeology and Water Movement

One of the most significant omissions within the current Scoping approach is the lack of an integrated assessment linking peat, geology and hydrogeology.

The site contains extensive peat deposits, including areas of deep peat exceeding two metres in depth.

Peatland systems depend upon stable hydrological conditions. Changes in drainage, excavation, groundwater flow or surface runoff can result in: drying of peat; increased erosion; oxidation and carbon release; slope instability; peat slide risk and peat instability. (Refs. 1, 2, 10, 11)

These risks may be amplified where peat overlies fractured limestone, karst systems or historical mine workings.

Historic mapping also identifies numerous springs and groundwater emergence points across the site. These features suggest active groundwater movement and reinforce the need for a detailed hydrogeological assessment. (Refs. 1, 2, 4)

A comprehensive conceptual hydrogeological model should be prepared to demonstrate how groundwater, peat, geology, springs and surface water systems interact across the development area.

5. Historic Mining Contamination and Water Quality

Insufficient attention appears to have been given to the potential mobilisation of historic mining contaminants. (Refs. 7, 1, 2)

Lead mining is commonly associated with elevated concentrations of: Lead (Pb); Zinc (Zn); Cadmium (Cd); Arsenic (As); Copper (Cu); and other trace metals.

These contaminants may remain relatively stable whilst undisturbed. However, excavation, drainage works, road construction, foundation installation and altered groundwater pathways may mobilise contaminants previously retained within spoil deposits, sediments, peat or mineralised ground.

The proposed development includes: turbine foundations; crane hard standings; access tracks; cable trenches; drainage infrastructure.

Collectively these activities have the potential to alter groundwater movement and sediment transport pathways.

The Environmental Statement should therefore include: groundwater quality monitoring; surface water quality monitoring; peat and soil chemistry testing; heavy metal analysis; contaminant transport modelling; assessment of historical mine waste. (Refs. 1, 7)

6. Private Water Supplies and the Swale Catchment

The wider area contains numerous private water supplies serving farms, rural properties and isolated dwellings.

Many of these supplies depend upon: springs; boreholes; local groundwater systems.

Such supplies may be particularly vulnerable to changes in groundwater quality and flow.

The site also drains towards watercourses including Arndale Beck, Holgate Beck, Moresdale Beck and tributaries of the River Swale.

Given the combination of historic mining, karst limestone and groundwater connectivity, the Environmental Statement should assess whether construction activities could: alter groundwater pathways; increase sediment loading; mobilise contaminants; affect private water supplies; affect downstream water quality.

In the absence of a detailed hydrogeological and contamination assessment, it cannot be concluded that impacts on water resources have been adequately assessed.

7. Landslides, Erosion and Climate Resilience

The Scoping Report does not appear to place sufficient weight on the implications of recent extreme weather events within the wider Swaledale catchment.

The July 2019 flooding event caused severe erosion, infrastructure damage and slope instability across parts of Swaledale, Arkengarthdale, Reeth and Grinton. Subsequent storm events have also demonstrated the vulnerability of upland landscapes to intense rainfall. (Refs. 8, 9)

The key issue is not whether the site is stable under average conditions, but whether it will remain stable under future climatic conditions over the operational lifetime of the development.

Climate projections indicate increasing frequency and intensity of heavy rainfall events.

Accordingly, the Environmental Statement should include: peat stability assessment; slope stability assessment; erosion modelling; climate resilience assessment; assessment of extreme rainfall scenarios. (Refs. 9, 10, 11)

To conclude, the current Scoping Report does not provide sufficient evidence to demonstrate that the geological, mining, karst, hydrogeological and contamination risks associated with the Hope Moor Wind Farm have been fully characterised.

The combination of: extensive historic lead mining; potential unrecorded workings; karst limestone; sink holes and shake holes; deep peat; springs and groundwater pathways; private water supplies; downstream catchments; climate-driven erosion risks,

This combination creates a highly complex environmental setting.

These matters should remain fully scoped into the Environmental Impact Assessment and should be assessed through an integrated programme of geological, hydrogeological, contamination and ground stability investigations before any conclusions regarding significance can be reached.

References

1. Hope Moor Wind Farm Scoping Report – Chapter 9: Hydrology and Hydrogeology.
2. Hope Moor Wind Farm Scoping Report – Chapter 10: Geology, Soils and Ground Conditions.
3. Hope Moor Wind Farm Scoping Report – Appendix 10A: Mining Risk Assessment.
4. Historic Ordnance Survey Mapping (1919 Edition) – Hope Moor, Barningham Moor, Holgate Moor and Keswick Moor.
5. British Geological Survey (BGS) – Karst and Sinkhole Hazards.
6. British Geological Survey (BGS) GeoSure Dataset – Soluble Rocks and Ground Stability.
7. Environment Agency – Metal Mining Contaminated Water and Catchment Management Guidance.
8. North Yorkshire County Council Section 19 Flood Investigation Report (Swaledale and Arkengarthdale Floods, July 2019).

9. UK Climate Projections (UKCP18) – Extreme Rainfall and Flood Risk.
10. IUCN UK Peatland Programme – Peatland Hydrology and Stability Guidance.
11. Scottish Government Peat Landslide Hazard and Risk Assessment Best Practice Guide.
12. Coal Authority and British Geological Survey Guidance on Abandoned Mine Workings and Ground Stability.

The Scoping Report itself records limestone beneath the northern site, inferred faults, widespread peat in the centre and west, extensive deep peat over 2m, peat drainage/erosion features, 31 recorded lead mine entries, visible collapsed-pit type depressions, and likely unrecorded shallow workings. It also says only a “limited” geomorphological mapping exercise is proposed for peat slide risk, which I would like to challenge. BGS confirms that construction, changed surface drainage and altered ground loading can trigger sinkhole development in karst/soluble rock settings. ([British Geological Survey][1]) The 2019 North Yorkshire Section 19 flood report covers Reeth, Arkengarthdale and Grinton as among the worst affected areas. ([edemocracy.northyorks.gov.uk][2])

[1]: https://www.bgs.ac.uk/discovering-geology/earth-hazards/sinkholes/?utm_source=chatgpt.com "Understanding sinkholes and karst"

[2]: https://edemocracy.northyorks.gov.uk/Data/Business%20and%20Environmental%20Services%20Corporate%20Director%20and%20Executive%20Members%20Meeting/20200221/Agenda/Flood%20and%20Water%20Management%20Act%202010%20Section%2019%20Investigation%20and%20Re.pdf?utm_source=chatgpt.com "Flood and Water Management Act 2010 Section 19 ..."

Receptor Comments 6 Scoping Report

Receptor - The Moorland - Sphagnum Moss.

Date: 23 June 2026 at 06:13:03 BST

Receptor 1: The Moorland: an intact peatland ecosystem and carbon sink.

The site that has been chosen for this industrial development is completely unsuitable in both size and scale. This would irreversibly damage deep peat moorland, affecting its hydrology, protected habitats and wider climate system that depends upon undisturbed peat retaining stored carbon. I strongly believe that the environmental impacts of the proposed development will be considerably higher than the green energy generated over the lifespan of the project.

I am particularly concerned about the potential loss of Sphagnum Moss peat bogs which are peppered and accurately recorded across the footprint of the proposed wind farm. These bogs are one of the engines that helps create peat land in the first place, so a loss of these critical ecological systems cuts off the pathway of continual peat land growth.

It is also been a prudent measure by National Parks and other land management organisations, that the recognition of upland peat areas not be outlined for wind and solar development due to the ability to naturally absorb carbon dioxide and therefore play an important role in the journey towards Net Zero.

Receptor 2: Ecology & Wildlife

The area supports important rare and nationally protected wildlife and ecology and is an important breeding habitat for many red listed species. These habitats are vulnerable to disturbance and disruption; it is known that the blades can kill important protected bird species and the disturbance from all the proposed development areas will have severe impacts across the whole ecology and ornithology of the site.

I am particularly concerned about the welfare and future of the Eurasian Curlew (*Numenius arquata*) within the boundary of the wind farm.

Despite the Curlews National decline, I have been able to observe and document a relatively stable seasonal population that call the wind farm footprint their breeding home.

You will understand that it is not appropriate for me to identify the Curlews nesting areas precisely, but what I can reveal, is that there are many areas in immediate conflict with some of the proposed turbine positions and the landowner has publicly confirmed that there are around 70 curlew nesting sites on his moorland.

It is reasonable to conclude, that if the wind farm were to be developed, these established and fragile nesting areas would be lost, and the Curlew breeding safe haven at Hope Moor would be gone forever.

Receptor 3 : Ecology & Wildlife

I am particularly concerned about the welfare and future of the Golden Plover (*Pluvialis apricaria*) and its inclusion as a receptor.

This migratory bird, is a skittish, easily spooked wader, that seeks areas where they will be left undisturbed to roost and breed. They claim sanctuary on the moorland within the footprint of the proposed wind farm in early spring in staggering numbers. I have managed to film and count spring flocks on several occasions this year totalling a 1000+ in number. This figure represents approximately ten percent of the uk population of this bird at that time of year. Having observed these birds for many years, it is without doubt that the development and inevitable presence of a large wind farm would simply put an end to the visiting and breeding of Golden Plovers at Hope Moor.

I am looking forward to seeing any reports or documents to show how this issue can be avoided and the Golden Plovers can continue to thrive on this precious moorland.

I respectfully request that these receptors are fully and rigorously assessed, and that their significance is given appropriate weight in the decision-making process

Receptor Comments 7 Scoping Report

Scoping and Receptor- Hope Moor Development omissions

Date: 24 June 2026 at 12:38:18 BST

In support of receptor comments below, please find enclosed images of the currently exposed shaft adjacent to Scheduled Monument 1017441 -

National Grid reference NZ0514807545





I am writing to highlight what I believe are serious omissions in the scoping process for Hope Moor Wind Farm ref EN0110038

My principal concerns relate to the following receptors:

Archaeology and Cultural Heritage

Barningham Moor contains one of the most significant prehistoric landscapes in northern England, including scheduled monuments, prehistoric settlement remains, carved rocks, cairns and associated archaeological features. Recent Historic Environment Record data confirms the exceptional density of archaeological remains within the area.

During a recent site visit I identified what appears to be a previously unrecorded subsurface feature immediately adjacent to Scheduled Monument [1017441](#). This has been formally reported to Historic England and the relevant Historic Environment Record authorities for assessment.

Regardless of the outcome of that assessment, the discovery highlights the possibility that further archaeological and geological features remain unrecorded within the wider landscape and reinforces the need for particularly rigorous investigation before any intrusive works are undertaken.

Peatland, Geology and Hydrology

I am concerned about the potential effects of large-scale foundations, access tracks and associated infrastructure on the peatland and hydrological systems of the moor. These systems are interconnected and any assessment should fully consider impacts on peat stability, water movement and associated habitats.

Landscape Character

The defining qualities of this landscape are its openness, remoteness and sense of wildness. The proposed turbine scale would introduce a highly industrial element into a landscape whose character has remained substantially undeveloped for centuries.

Tourism and Cultural Value

The area attracts visitors because of its landscape, heritage and opportunities for quiet recreation. These qualities contribute to the local economy and cultural identity of the region and should be carefully weighed against the benefits of the proposal.

For these reasons I believe the environmental, archaeological and landscape impacts of the proposal require particularly rigorous assessment before any decision is made.

Receptor Comments 8 Scoping Report

- 1) The Scoping Report appears not to comply with EN-3, which requires developers to demonstrate that reasonable alternative sites have been assessed. No such evidence is provided.

2. Systemic Minimisation of Baseline Conditions

2.1 Artificially Reduced Study Areas

Across multiple topics, the Scoping Report adopts study areas far smaller than industry norms, resulting in the exclusion of receptors that would clearly be affected:

- **Bats:** A 200 m study area is proposed, despite the report itself acknowledging foraging ranges of up to 4 km for several species. This is inconsistent with CIEEM guidance and NatureScot recommendations for wide-ranging species, being a twenty-fold underestimation of the ecological zone of influence.
- **Heritage Assets:** A 10km study area is proposed, even though the ZTV clearly shows significant intervisibility with designated heritage assets at far greater distances.
- **Amphibians and reptiles:** Entire groups are scoped out before any survey work has been completed, contrary to CIEEM guidance.
- **Ornithology:** A 500m survey study area for moorland breeding birds is insufficient. When evaluating ground nesting waders like curlew and lapwing, Natural England expand this to include In-by line.
- **Hydrology:** a 500m study area beyond the boundary of the site does not reflect the characteristics of the site, as acknowledged in the Scoping Report by a reference to a precautionary distance of 2 km downstream from the project will be considered.

These constrained study areas create a false impression of low impact and are not compliant with standard EIA practice.

3. Premature Scoping-Out of Receptors Before Survey Completion

The Scoping Report repeatedly removes receptors from assessment before any baseline data exists. This includes:

- Brignall Banks SSSI
- Local Wildlife sites LWS beyond 200m
- Low collision-risk bats

- Amphibians and reptiles
- Ornithology – several species
- Non-priority habitats
- Heritage assets
- Hydrological receptors beyond the immediate footprint

This approach is not acceptable under the EIA Regulations, which require scoping to be based on evidence, not assumptions.

3.1 Brignall Banks SSSI

Brignall Banks SSSI is situated 1.7 km north of the Site and of importance for its upland mixed ash woods and upland oakwoods. It occurs adjacent to the Gill Beck, which has headwaters within the Site such that the two are hydrologically linked. However, it has been scoped out on the grounds that:

‘Indirect impacts Brignall Banks Site of Special Scientific Interest (SSSI) because embedded mitigation measures are considered sufficient to reduce potential risks to notified features to negligible levels.’

Premature scoping-out also contradicts CIEEM (2018) Guidelines for Ecological Impact Assessment, which state that receptors must not be excluded without adequate justification and baseline data.

4. Incorrect Peat Definitions and Understatement of Peatland Sensitivity

4.1 Use of a 200 cm Threshold for “Deep Peat”

The Scoping Report defines “deep peat” as >200 cm, which is not a recognised UK definition.

The accepted standard across statutory agencies (Natural England and DEFRA) is:

- Peat <30 cm = peat soil
- Peat > or equal to 30 cm = deep peat
- Blanket bog = priority habitat and irreplaceable habitat

By using a 200 cm threshold, the developer artificially reduces the extent of “deep peat” and therefore the perceived impact of:

- Turbine foundations
- Access tracks

- Cable trenches
- Borrow pits
- Crane hardstandings
- Substation and compounds

This is a material misrepresentation of the site's peat resource.

4.2 Blanket Bog as Irreplaceable Habitat

The Scoping Report acknowledges blanket bog as a priority habitat and irreplaceable, yet simultaneously proposes to potentially scope out large areas of peatland from detailed assessment.

While confirming the presence of deep peat and blanket bog on the site, the Scoping Report minimises its importance by stating that:

‘An initial desk-based review of satellite imagery and the Natural England Peat Map indicates that no areas of peatland in a ‘near natural’ condition are present within the Wind Farm Array.’

Although, the report goes on to clarify that this preliminary finding will be verified through the completion of detailed peat depth and condition survey and associated assessment of the Site, the narrative has been set.

4.3 Design and Mitigation

The Scoping Report outlines measures adopted as part of the project including:

‘Avoidance by design where possible. Inherent in the emerging design of the Project is the commitment to avoid impacts on peat wherever practicable. The design process will prioritise the routing and siting of infrastructure avoiding areas of deeper peat (greater than 1 m depth) where technically possibly’

It should be noted that the 1 m depth is an Engineering constraint and bears no correlation to Ecological recognised definition of deep peat as used by Natural England and DEFRA. This commitment is therefore not applicable to the protection of or to the disturbance reduction of deep peat.

These contradictions must be resolved through a full peat depth survey, peat slide risk assessment and carbon payback analysis.

5. Understatement of Heritage Impacts

Despite the ZTV showing clear visibility from multiple heritage assets, the Scoping Report scopes out all individual assets beyond 3 km. As a further contradiction, the

Landscape and Visual ZTV desk top assessment identified a location at 14.7km with potential for significant effects due to level of theoretical visibility. The approach used within the scoping report has resulted in 134 heritage assets being scope out of further assessment, while only 70 heritage assets have been scoped in for further assessment. This high level of filtering, at such an early stage, raises concerns about the methodology and criteria used.

This is contrary to:

- Historic England guidance, which recognises visibility impacts up to 15–20 km for tall structures
- EIA practice, which requires assessment where intervisibility exists
- The site's location within a landscape rich in scheduled monuments, medieval field systems, and historic routeways

The scoping-out of heritage assets is therefore unjustified and must be reversed.

6. Ornithology

The ornithology section is one of the weakest elements of the Scoping Report. The approach taken is not compliant with Natural England or CIEEM guidance.

6.1 Premature scoping-out of species before surveys

The report excludes several species groups before vantage point, breeding bird, wintering bird, or flight activity surveys have been adequately completed. This includes:

- “Low collision-risk” species
- “Non-priority” waders
- “Low sensitivity” raptors
- All species assumed to be “in low numbers”

This is not acceptable. Collision risk cannot be assessed without empirical flight activity data. This approach has resulted in important species such as Barn Owls and Nightjars being scoped out of the EIA for the project.

6.2 Failure to recognise the site's regional ornithological importance

Hope Moor lies within a landscape supporting a significant number of Red and Amber list species, including curlew, lapwing, golden plover, merlin, and short eared owl.

While recognising that Hope Moor is located within 10 km of a number of statutory designated sites:

- Cotherstone Moor SSSI
- Bollihope, Pikestone, Eggleston and Woodland Fells SSSI
- Mallerstang-Swaledale Head SSSI
- Lune Forest SSSI
- Swale Lakes SSSI
- Upper Teesdale SSSI
- Teesdale Allotments SSSI

These have been scoped out of the EIA, 'on the basis of spatial separation and embedded mitigation and therefore absence of credible connectivity and pathway for effect', without adequate justification and baseline data.

6.3 Inadequate study areas

The proposed 500m survey study area for moorland breeding birds is insufficient. When evaluating ground nesting waders like curlew and lapwing, Natural England expand this to include In-bye line.

- This study area captures enclosed agricultural farmland sitting below or within 1 km of the upper moorland boundary.
- This zone is included because waders frequently move between open moorland and lower managed farmland pastures to feed and raise chicks.

This artificially reduces the number of birds recorded and therefore the predicted impact.

7 Hydrology and Hydrogeology

The Scoping Report understates hydrological sensitivity despite the site being dominated by deep peat, blanket bog, areas of saturated upland soils and 20.9 km of watercourses

7.1 Watercourses and water dependent designated sites scoped out prematurely

Several watercourses, flushes and water dependent designated sites are scoped out on the basis of distance alone. The Scoping Report stating 'It is proposed to scope out the effects on water dependent designated sites because there are no hydrologically connected designated sites within the Study Area or within 1 km downstream of the Study Area.'

despite:

- Peatland hydrology being non linear
- Flow paths extending hundreds of metres

- High sensitivity to disturbance from tracks and cable trenches

Without detailed surveys and mapping this seems premature at the scoping stage

7.2 No assessment of downstream receptors

The restrictive study area of 500m excludes the vast majority of downstream receptors, notably local communities dependant on private water supplies, boreholes and springs.

The report does not adequately consider:

- Drinking water catchments
- Private water supplies
- Flood risk downstream
- Sediment mobilisation
- Water quality deterioration

This is contrary to the Water Framework Directive and UK hydrological guidance.

8. Use of Mitigation to Justify Scoping-Out (Not Permitted at Scoping Stage)

The Scoping Report repeatedly uses future mitigation as justification for removing receptors from assessment. Examples include:

- Assuming “good practice construction methods” will prevent peat slide
- Assuming “track design” will avoid hydrological disruption
- Assuming “micro-siting” will avoid sensitive habitats
- Assuming “embedded mitigation measures” as basis to scope out Barn Owls

Under the EIA Regulations, mitigation cannot be used to scope out impacts. Scoping must be based on worst-case assessment, not assumed future mitigation.

9. Inadequate Consultation with Key Consultees

The Scoping Report does not demonstrate adequate engagement with stated consultees, examples:

- Natural England
- Durham County Council
- North Yorkshire Council
- North Pennines AONB Partnership

- Yorkshire Dales National Park Authority
- Historic England
- Local bat groups and ornithological groups
- Hydrology and peatland specialists
- Teesside International Airport has been scoped out

Where consultees have not been engaged, the scoping cannot be considered robust.

10. Lack of Evidence of Alternative Sites (EN-3 Non-Compliance)

National Policy Statement – Energy, EN-3: NPS for Renewable Energy Infrastructure, states: Onshore wind farm sites within England may be proposed on peatland, however applicants should rule out other locations before siting developments on peatland. In particular, areas of deep peat, which have the highest potential for carbon emissions, should be avoided. The England Peat Map is a tool that can be used to identify if a potential site is on peatland, however this should be used alongside other assessments. Where developments are proposed on peatlands, including on deep peat, applicants must conduct a detailed peat survey and must provide justification of the need for infrastructure to be sited on peatland.

EN-3 (Renewable Energy Infrastructure) requires developers to demonstrate that:

“Reasonable alternatives to the proposed site have been considered, including alternative locations.”

The Scoping Report provides no evidence that:

- Alternative upland sites were assessed
- Lower-impact sites were considered
- Grid-proximate brownfield or industrial sites were evaluated
- Landscape capacity studies informed site selection

This is a clear breach of EN-3 and must be rectified before scoping can be accepted.

11. Summary and Request to PINS

Given the issues outlined above, the Scoping Report:

- Minimises baseline conditions
- Uses artificially small study areas
- Prematurely scopes out receptors without sufficient evidence

- Mis-defines peat to understate impacts
- Fails to comply with EN-3 requirements for alternatives
- Understates heritage and ecological impacts
- Uses mitigation inappropriately at scoping stage
- Does not demonstrate adequate consultee engagement

I therefore request that PINS:

1. Reject the Scoping Report in its current form, and
2. Require the developer to submit a revised Scoping Report that:
 - Uses recognised peat definitions
 - Applies appropriate study areas
 - Includes all receptors until evidence supports scoping-out
 - Provides a full alternatives assessment as required by EN-3
 - Undertakes full peat, hydrology, ecology, and heritage baseline surveys
 - Reflects the true sensitivity of Hope Moor's upland peatland landscape

Hope Moor is an irreplaceable upland peatland landscape of high ecological, hydrological, archaeological, and cultural value. The Scoping Report does not reflect this reality. I ask PINS to ensure that the EIA proceeds on a sound, evidence-based footing.

Receptor Comments 8 Scoping Report

Planning Inspectorate
[HopeMoorWindFarm@planninginspector
ate.gov.uk]

Reference: OR-0005254/01
Customer reference: EN0110038

25 June 2026

Dear Sir/Madam

EIA SCOPING CONSULTATION FOR THE HOPE MOOR WIND FARM PROJECT

Thank you for your consultation on the Scoping Report, submitted under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, in support of the Application by Fred. Olsen Renewables Ltd (the Applicant) for an Order granting Development Consent (DCO) for the Hope Moor Wind Farm. This consultation was received on 29 May 2026. We have reviewed the Main Text and accompanying figures and appendices, and can provide the following advice in relation to matters within our remit.

We must take issue with the scope of the Environmental Impact Assessment (EIA) as currently defined and would recommend further issues are scoped in to meet the requirements of the EIA regulations.

Further detailed comments are provided within the following appendices:

- Appendix A – Comments on the scope of the EIA
- Appendix B – General advice on the proposals and EIA content
- Appendix C – Additional advice for the Applicant

Please note this response does not represent our final view in relation to any future DCO, or any environmental permit applications made to us. Our final views will be based on all relevant information including applications and guidance available at the time of submission.

We trust this advice is useful.

Yours faithfully,

Chloe Snowball

Planning Specialist – National Infrastructure Team

Email: Nlteam@environment-agency.gov.uk

Appendix A – Comments on the scope of the EIA

Biodiversity

Document Reference(s): EIA Scoping Report, Main Text, Tables 7-1, 7-4, 7-7 and 19-2	
Issue	Impacts to otter have been proposed to be scoped out of the EIA on the basis of lack of evidence, suitable habitat within the Site, and lack of potential significant impacts.
Impact	Risk of the Proposed Development causing unacceptable harm to otter.
Solution	Scope in impacts to otter. Clarity should be provided on what (if any) consideration will be given to otters going forward.
Additional narrative/explanation Following the 6th National Otter Survey, otter have been found to be present on all major watercourses and their tributaries. Similarly, otter utilise smaller watercourses to rest and as temporary shelters or transit routes, therefore it can be assumed that otter are present within the Site and should therefore be scoped into the EIA. Table 7-1 states that updated surveys for otter are not proposed to be completed due to a combination of lack of evidence and no anticipated significant adverse impacts to potentially suitable habitats. This is a contradiction to Table 7-4 which states that while no evidence of otter has been recorded at the Site, its potential future presence cannot be ruled out and therefore it has been taken forward in the assessment. This further contradicts Table 7-7 which states that although otter is known to be present locally, the need for further survey and assessment has been scoped out.	

Water Quality

Document Reference(s): EIA Scoping Report, Main Text, Tables 9-5 and 9-6	
Issue	The proposed scope of the EIA does not include: • Foul drainage impacts during any phase • Any decommissioning activities.
Impact	Risk of the Proposed Development posing a risk to the water environment and decreasing water quality if foul water is not appropriately managed and contained during all phases. Risk of the Proposed Development decreasing water quality if sediment, hydrocarbons and other contaminants are allowed to enter the water environment during decommissioning.
Solution	Scope in: • Foul drainage impacts for all phases (until the containment and disposal method is finalised) • All decommissioning activities within Table 9-6 until a Decommissioning Plan can be reviewed.

Additional narrative/explanation	
Impacts for Hydrology and Hydrogeology during decommissioning have been proposed to be scoped out on the basis that there will be a Decommissioning Plan. However, without the provision of mitigation measures, it is unclear at this stage whether their design and the level of protection that they will provide will be suitable.	

Document Reference(s): EIA Scoping Report, Main Text, Tables 9-5 and 18-13	
Issue	The proposed scope of the EIA does not include impacts of fire risk on the water environment.
Impact	Risk of firewater (from fire suppression or contaminated surface runoff) posing an unacceptable risk to water environment receptors during the operation phase, unless they are appropriately managed and contained.
Solution	Scope in impacts of firewater from turbine fire (associated with lightning strike or electrical equipment failure) and substations for the Water Environment (Hydrology and Hydrogeology Environmental Statement (ES) chapter).
Additional narrative/explanation	
Table 18-13 scopes out Fires, Lightning and Release of chemicals under the premise that they will be considered in the Construction Environment Management Plan (CEMP) and that turbine design will be suitable. However, a CEMP has not yet been prepared, therefore any mitigation measures are unknown at this stage.	

Groundwater & Contaminated Land

Document Reference(s): EIA Scoping Report, Main Text, Sections 9.2.2 and 9.2.3	
Issue	An insufficient buffer of 500m has been used around the Scoping Boundary.
Impact	Risk of groundwater receptors being potentially harmed by the Proposed Development if an insufficient buffer is used.
Solution	Utilise a 2km scoping distance to potential groundwater receptors.
Additional narrative/explanation	
Due to similar sensitivities and risks we believe 2km should be utilised as the buffer around the Scoping Boundary to match the downstream used for hydrological receptors (as mentioned in Section 9.2.3). This would ensure potential impacts could be assessed and designed around at an early enough stage.	

Document Reference(s): EIA Scoping Report, Main Text, Table 9-5	
Issue	Table 9-5 which summaries impacts proposed to be scoped into the assessment for Hydrology and Hydrogeology does not include heat as a pollutant.
Impact	Risks to groundwater and groundwater dependent receptors has not and will not be assessed.
Solution	Specifically scope in heat as a groundwater pollutant into the EIA.

Additional narrative/explanation

Heat as a groundwater pollutant was introduced in 2023 via the [Environmental Permitting \(England and Wales\) \(Amendment\) \(England\) Regulations 2023 SI No.2023/651](#):

“pollutant”, in relation to England, means any—

1. substance,
2. heat, or
3. biological entity or micro-organism,

which is liable to cause pollution;”

We are mindful that work is being carried out in this area in relation to heating of groundwater from Ground Source Heating and Cooling (GSHC) systems but there is currently no guidance relating to the potential thermal implications of high voltage (HV) buried electricity cables.

The Environment Agency’s Chief Scientist’s Group has published a report for GSHC systems ([Environmental Impacts of Temperature Changes from Ground Source Heating and Cooling Systems](#)). In this study, a ‘thermal plume’ was defined as the region around a GSHC system that experiences a 1 degree C temperature change or greater. While the study is not directly applicable to thermal emission from underground cables, an equivalent benchmark could be considered when assessing heat pollution from underground HV cables.

The Chief Scientist’s Group states that the environmental factors with the greatest influence on thermal plume development include groundwater flow and bulk thermal conductivity. It identifies that impacts may occur by direct (temperature change) and indirect (e.g. changes in water chemistry) means.

At this stage we require the potential thermal implications of buried cables, in relation to risks to groundwater, to be considered further via desk-based assessment. This should also include risks relating to damage and release of contaminants from peat.

Document Reference(s): EIA Scoping Report, Main Text, Section 9

Issue	The scope of the EIA has not identified any Water Framework Directive (WFD) Groundwater bodies.
Impact	Risk of the Proposed Development impacting a key receptor if it is omitted from further assessment.
Solution	Scope in WFD Groundwater bodies for further assessment.

Additional narrative/explanation

The site boundary sits on the Tees Carb Limestone & Millstone Grit, and SUNO Millstone Grit and Carboniferous Limestone WFD Groundwater Bodies. These are key receptors, and risks to them should be assessed within the EIA.

Document Reference(s): EIA Scoping Report, Main Text, Table 9-6

Issue	Water dependent designated sites have been proposed to be scoped out.

Impact	Risk of the Proposed Development impacting key receptors if omitted from further assessment.
Solution	Scope in water dependent designated sites.
Additional narrative/explanation The justification for scoping out this impact (as mentioned in Table 9-6) contradicts earlier statements that water dependent sites and ecosystems will be identified by site walk over, as such the impacts on these sites should not be scoped out unless this assessment has been carried out.	

Document Reference(s): EIA Scoping Report, Main Text, Tables 9-6 and 10-4	
Issue	No justification has been provided for decommissioning risks being the same as those during construction.
Impact	Risk of the Proposed Development impacting and polluting the water environment during decommissioning activities.
Solution	Scope in all decommissioning activities within Tables 9-6 and 10-4 until a Decommissioning Plan can be reviewed.

Document Reference(s): EIA Scoping Report, Main Text, Sections 10.3.3-10.3.6	
Issue	Only lithologies under the site boundary have been identified.
Impact	Risk of the Proposed Development impacting certain receptors if they and their potential pathways are not identified.
Solution	Ensure a 2km buffer from the site boundary is utilised to identify relevant lithologies.
Additional narrative/explanation Due to the 3-dimensional nature of geology and the currently unknown maximum depths that foundation and excavation work may reach, lithologies not listed may be impacted. To ensure impacts are assessed, the Applicant should utilise a 2km buffer from the site boundary. This will ensure all relevant potential pathways and receptors are identified.	

Appendix B – General advice on the proposals and EIA content

Biodiversity

Document Reference(s): EIA Scoping Report, Main Text, Section 2.5.19	
Issue	Open-cut techniques will be used as part of pipeline installation, to create trenches for pipes and cables.
Impact	Use of open-cut methods for installing cabling and pipelines risk destroying habitats, including those of protected species such as the water vole. Additionally, installation of cables and pipelines can prevent the free movement of mammals along the river corridor. There is also a risk of entrapment of mammals such as otters within compounds and trenches associated with cable installation.
Solution	Cover-over open trenches to prevent wildlife from falling in and place a ramp to enable wildlife to escape. Securely fence compounds and trenches during construction.
Additional narrative/explanation Reinstatement of bankside habitats along watercourses and ditches should be considered after completion of works. This could include sowing the bankside habitats with a species rich locally appropriate sward, and erecting fencing to prevent livestock access.	

Document Reference(s): EIA Scoping Report, Main Text, Sections 2.5.33 and 9.5.2	
Issue	Lack of detail regarding proposed watercourse crossings.
Impact	Whilst full details of watercourse crossings are to be expected in the ES, the lack of a broad overview of watercourse crossings in the early stages of consultation makes it difficult for consultees to provide comment.
Solution	Should any access tracks cross watercourses or ditches, we would expect to see open-span bridge design. We would encourage improving existing watercourse crossing points, for example, removing a culvert and replacing it with an open-span bridge.
Additional narrative/explanation Although culverts have not been mentioned within the report, these should be avoided. Culverts have the potential to fragment habitats and reduce connectivity, making dispersal and commuting for some species difficult. Culverts also put an added pressure on otters during periods of high water-levels, as culverts offer little room for conveyance and put otters at risk of being killed when crossing roads. We would encourage the Applicant to discuss watercourse crossings with the Environment Agency as soon as possible to ensure that they are designed appropriately, as opposed to leaving it until the publication of the ES.	

Document Reference(s): EIA Scoping Report, Main Text, Section 2.5.32

Issue	A riparian buffer of 50m is to be maintained around watercourses, however the report does not specify where the buffer measures from.
Impact	Risk of implementing an insufficient buffer between the development and any watercourse or ditch, which could hinder the free movement of riparian mammals up and down the system and prevent the maintenance of the natural river corridor.
Solution	The riparian buffer must be measured from the bank top of the watercourses.

Document Reference(s): EIA Scoping Report, Volume B: Appendices, Appendix 7C White-clawed Crayfish Technical Report

Issue	No further surveys are planned for white-clawed crayfish.
Impact	Risk of changes in the baseline of species presence and distribution being missed if an updated survey for white-clawed crayfish is not planned. Our records show that white-clawed crayfish have been recorded in Dalton Beck (a tributary of which bisects the scoping boundary).
Solution	We would strongly suggest that an additional white-clawed crayfish survey is planned, to consider the lapse of time from the previous survey.

Additional narrative/explanation

The Chartered Institute of Ecology and Environmental Management's (CIEEM) Advice Note 'On the lifespan of ecological reports & surveys' states that species survey data may be out of date around 12-18 months following a survey. Although the white-clawed crayfish survey found no evidence of the species, suitable habitat and refugia is present and therefore white-clawed crayfish could occupy the site in the future.

Fisheries

Document Reference(s): EIA Scoping Report, Volume B: Appendices, Appendix 7B Kexwith Fish Survey Report

Issue	Watercourses are present within the scoping boundary.
Impact	Potential impacts to fish, as outlined in Section 4 (Recommendations) of Appendix 7B.
Solution	According to the mitigation hierarchy, all in-channel works, particularly on the Moresdale Beck and Arndale Beck, should be avoided. Where this is not possible, the recommendations listed in Appendix 7B should be incorporated into the design and mitigation for the proposal. In particular, no new culverts should be installed on the Moresdale Beck and Arndale Beck. Where any existing culverts are used, they should be adapted so that fish passage is improved through them.

Geomorphology

Document Reference(s): EIA Scoping Report, Main Text, Section 9.5.2

Issue	Lack of detail regarding proposed watercourse crossings.

Impact	Risk of watercourse crossings deteriorating downstream WFD waterbodies, if there is no proper consideration of the water environment, especially in headwaters, when designing watercourse crossings for cable routes or temporary/permanent access. This is especially important to note when dealing with waterbodies that may be classified as poor or low quality, as deterioration of those water courses, overall or in a particular class, is not allowed under WFD legislation.
Solution	Ensure watercourse crossings are sensitively designed. Avoid interfering with watercourse headwaters, including spring heads and “wet flushes”. We would also recommend that the River Basin Management Plan is consulted to determine whether actions to enhance/lead to betterment of watercourses are possible.
Additional narrative/explanation General considerations for watercourse crossings are provided in Appendix C.	

Flood Risk and Modelling

Document Reference(s): EIA Scoping Report, Main Text, Section 3.15.5	
Issue	Lack of clarity regarding the climate change allowances to be applied.
Impact	Risk of underestimating future flood risk.
Solution	Ensure appropriate climate change allowances are applied to flows and rainfall in line with the development vulnerability classification.
Additional narrative/explanation Section 3.15.5 states that the Flood Risk Assessment (FRA) will give due regard to climate change and will form an appendix to the ES. This is welcomed. Please see Flood risk assessments: climate change allowances - GOV.UK for further details on how to establish the design flood event for the development based on the development vulnerability classification.	

Document Reference(s): EIA Scoping Report, Main Text, Section 9.3.20	
Issue	Flood risk from catchments less than 3km ² may not be represented by the Flood Map for Planning.
Impact	Risk of underestimating flood risk associated with smaller Ordinary Watercourses.
Solution	Undertake an assessment of catchments less than 3km ² within the study area and identify any unmapped flood risk in consultation with the Environment Agency. Ensure this is adequately considered within the FRA.
Additional narrative/explanation Section 9.3.20 notes that fluvial flood risk mapping indicates that only minimal areas of Flood Zone 2 and 3 are present within the study area. This is correct, however, it is important to note that the Flood Map for Planning generally only covers watercourses with a catchment area greater than 3km ² . There are several watercourses which cross the draft Order Limits for the development which have no associated flood zone mapping due to the small size of their respective catchments.	

There could be fluvial flood risk associated with these watercourses, it is just not modelled or mapped.

Document Reference(s): EIA Scoping Report, Main Text, Section 9.4.15

Issue	Hydraulic modelling scope and use of existing flood risk datasets.
Impact	Risk of inaccurately assessing flood risk if appropriate methods are not used.
Solution	Please consult the Environment Agency when developing hydraulic models or using existing hydraulic modelling data to inform flood risk both to and from the Proposed Development.

Additional narrative/explanation

Section 9.4.15 notes that further data collection will be undertaken to fully assess the potential impacts of the project on the water environment. This will include targeted data requests from the Environment Agency and Local Planning Authorities. This is welcomed.

The Environment Agency should be consulted on any hydraulic modelling which is developed to inform the FRA. Where existing modelling data is used to inform the FRA, please check any modelling data you use in line with the following guidance: [Using modelling for flood risk assessments - GOV.UK](#).

Document Reference(s): EIA Scoping Report, Main Text, Section 9.5.2

Issue	Lack of detail regarding freeboard and design flood levels for any watercourse crossings that may be proposed.
Impact	Risk of increasing flood risk if watercourse crossings are designed inappropriately.
Solution	Ensure soffit levels of any temporary and permanent access crossings are above the design flood level with an appropriate allowance for freeboard. Further detail is provided in the additional narrative/explanation box.

Additional narrative/explanation

Section 9.5.2 notes that any new tracks will be designed to limit the number of crossings required. This is welcomed.

Please note that any temporary or permanent crossings should be designed as such that they are raised 600mm above the design flood level. In the context of fluvial flood risk, the design flood level for temporary crossings would be the 1% (1 in 100) annual exceedance probability (AEP) scenario water level. For permanent crossings, a higher central allowance should be applied for climate change considering the lifetime of the development to determine the design flood level.

Water Quality

Document Reference(s): EIA Scoping Report, Main Text, Sections 2.5.11, 2.5.42, 2.5.44 and 2.6.1, Tables 9-5 and 19-1

Issue	Lack of detail provided regarding how use of concrete will be managed during the construction phase to protect the water environment.

Impact	Risk of the Proposed Development causing a deterioration in water quality if hazardous substances enter surface runoff and are subsequently discharged. Leachate from concrete can carry chemicals, including heavy metals, and can affect pH.
Solution	Please ensure that the CEMP includes the following concrete mitigation: • Concrete/cement works should be minimised during heavy precipitation events and carried out during dry months. • When concrete is curing, covering should be used where possible, and pre-cast units should be used where possible. • Concrete washout facilities must be sited on impermeable lining, and water must be collected and not allowed to be discharged to surface waters.
Additional narrative/explanation We are pleased to see that impacts on surface water from concrete has been proposed to be scoped in for the construction phase.	

Document Reference(s): EIA Scoping Report, Main Text, Sections 2.5.6 and 2.5.43	
Issue	Lack of information provided regarding any bunding that will be associated with the transformers at the turbines and substation.
Impact	Risk of the Proposed Development posing an unacceptable risk to the water environment if the transformers (if they are oil insulated) are not bunded as they could leak or spill hydrocarbons.
Solution	All transformers should be bunded for all phases of development. Transformers will need to be suitably sized to contain 110% of the volume. Where they are exposed to rainwater, there must be a mechanism to remove accumulated rainwater regularly.

Document Reference(s): EIA Scoping Report, Main Text, Section 2.5.43 and Table 18-13	
Issue	Lack of clarity regarding drainage proposals at substations, and whether appropriate fire water containment measures will be provided. Details around the isolation of contaminated water are unknown at this stage.
Impact	Risk of the Proposed Development posing an unacceptable risk to the water environment including a deterioration in water quality if firewater and other chemicals are not contained sufficiently.
Solution	The substation must have a sealed drainage system with an automatically closing penstock valve to isolate any contaminated water. Firewater drainage from substations units should be contained within a sealed, impermeable drainage solution, unless the developer can demonstrate an alternative method which provides sufficient mitigation.

Additional narrative/explanation

We note that Table 18-13 says that the electrical equipment will be constructed in accordance with the appropriate fire safety standards. This is welcomed.

Due to the risk of chemicals in contaminated firewater, it would be our preference for the developer to considering tankering firewater it offsite, rather than treating and discharging. However, if discharge at the site is required, consideration will need to be given to the potential impacts of this discharge and confirm will need to be provided that a water discharge activity permit will be sought from the Environment Agency.

Where sites are designed with fire extinguishing systems that do not rely on water, fire crews may still use water for boundary cooling, and this can contain pollutants from the burning units, including any associated chemical leakage, and dust and ash from the air. As such, we expect firewater capture to be included in any design. Operation and activation of penstocks should be included within any maintenance schedule. Firewater must be tested for relevant contaminants to determine if it can be released, or if it needs to be removed from the site for disposal elsewhere.

Where gravel is proposed to be used within an impermeable drainage basin, the operator must demonstrate how they will manage accumulation of silt and pollutants within the base of the gravel. Contaminants from a fire event may accumulate in the gravel even if firewater runoff is identified as being suitable for release. These contaminants would then be released into the natural environment over longer periods of time.

Additional guidance in relation to discharging and permits is available here:
[Discharges to surface water and groundwater: environmental permits - GOV.UK.](#)

The Applicant should note that we will expect the drainage design to be produced following an adequate assessment of risks to groundwater (in addition to surface water), including a conceptual site model (CSM), and to include suitable provisions to contain water in the event of a fire.

Document Reference(s): EIA Scoping Report, Main Text, Sections 2.6.1 and 2.6.2

Issue	Chronologies of site preparation and construction are unknown, and establishment of site drainage is not clearly stated in the construction approach.
Impact	Without installing relevant impermeable lining, Sustainable Drainage Systems (SuDS) and shutoff valves prior to constructing the substation, there is a risk that in the event of a fire or pollution event any contaminated water will not be adequately isolated and could cause harm to the water environment.
Solution	The Applicant should commit to installing suitable drainage prior to other installations.

Additional narrative/explanation

We note that a detailed construction programme will be set out in the ES.

Document Reference(s): EIA Scoping Report, Main Text, Section 9.4.4 and Table 9-1	
Issue	Omission of key sources of relevant information from the Relevant Policy, Legislation and Relevant Guidance section of the report, as well as Table 9-1.
Impact	If all relevant guidance is not used, the assessment of the water environment may not be based on complete information.
Solution	The Applicant should use the following guidance and best practice documents for mitigation to the water environment: • CIRIA SuDS Manual (C753) should be mentioned in Table 9-1 (we note that it is currently only mentioned in Section 9.4.4) • CIRIA Containment Systems for the Prevention of Pollution (C736) • Oil storage regulations for businesses - GOV.UK • Pollution prevention for businesses - GOV.UK The Applicant should also use the Catchment Data Explorer England Catchment Data Explorer and Water Quality Explorer for available data for the baseline: Map Explorer Water Quality Explorer.

Document Reference(s): EIA Scoping Report, Main Text, Sections 9.4.15 and 9.9.1	
Issue	There is no mention of a water quality monitoring plan within the document.
Impact	If a water quality monitoring plan is not suitably designed it may not be able to capture a suitable baseline or detect relevant trends in water quality deterioration or improvement during the phases of the Proposed Development.
Solution	A water quality monitoring plan should be provided when the ES is produced. It should have a pre-construction, during construction and post-construction phase. It should clarify locations, frequency, quantity and possible methods of monitoring. The frequency should occur at least monthly and the locations should be upstream and downstream of any watercourse crossings or discharges. The Applicant should confirm how they intend to secure this existing monitoring commitment, i.e. through the CEMP.
Additional narrative/explanation In response to Q9.2 within Section 9.9.1 (with respect to surface water quality), we suggest that this approach can only be acceptable if there is sufficient data found for a desk-based survey. As few data sources have been provided, so we cannot currently assess the water quality baseline conditions for the impact assessment. However, the Applicant should be aware that whilst there may be published data on temperature, pH, dissolved oxygen etc, there is often limited published data on turbidity. Although WFD does not specify a specific limit for freshwater turbidity, it is important that there is some data to assess water quality to ensure that freshwater	

bodies remain in good condition. High turbidity levels can indicate poor water quality and may have negative impacts on aquatic ecosystems. If turbidity data is not available from alternative sources, a further assessment of turbidity should be carried out to support baseline data of water quality.

Furthermore, as previously stated, water quality monitoring will still be required for pre-construction, during construction and post-construction phases.

Groundwater & Contaminated Land

Document Reference(s): EIA Scoping Report, Main Text, Table 9-3	
Issue	Misidentification of sensitivity of receptors within Table 9-3.
Impact	Risk of mitigation measures being inadequate and therefore unable to sufficiently protect the water environment, if watercourses are not given a high enough receptor importance. Risk of changing the result of any outcomes reached by the EIA, if receptor sensitivity is not clear and correct.
Solution	The Applicant should revise their sensitivity brackets in line with LA113, Road drainage and the water environment, Revision 1, Highways England, March 2020. Further suggested amendments are included below.
Additional narrative/explanation Provide a Very High sensitivity and clarify whether the section missing a classification level is medium. Clarification on what a Source Protection Zone (SPZ) within a secondary A aquifer would be classified as is left unclear. Receptor importance should be increased to 'High' where watercourses are tributaries of WFD classified watercourses and where there could be downstream effects. Watercourses or waterbodies of good ecological status should be classified as 'High'. Watercourses or waterbodies with an ecological water quality status classed as 'Poor' in the Low category should be amended to say they are classed as 'Poor' or 'Bad' to cover all WFD classifications.	

Document Reference(s): EIA Scoping Report, Main Text, Section 2.5.11	
Issue	Vague information supplied regarding the expected maximum depths of works.
Impact	The potential depth at which construction related impacts may occur are not clear.
Solution	The Applicant should provide Maximum Design Scenario indicative depths for trench and trenchless installation methods and pile and other foundation design and supply a foundation works risk assessment for any penetrative works.
Additional narrative/explanation	

The report indicates wide ranges of depths for both foundations and cable installation. Cable depths should be included in assessment for the CEMP, and a foundation works risk assessment should risk assess foundation design.

Deep foundation, piling and ground improvement methods may create preferential pathways or otherwise result in the mobilisation of contamination or alter groundwater flow paths if not adequately mitigated.

Piling and penetrative ground improvement methods should be designed in accordance with CL:AIRE guidance [Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention](#), published March 2025.

A Foundation works risk assessment should be produced in areas of sensitive groundwater such as in Secondary A aquifers, SPZs or where other receptors may be linked.

We recognise that at this stage more detailed information may not be available, however we wish to provide this information now to aid future assessments to be carried out.

Document Reference(s): EIA Scoping Report, Main Text, Sections 4, 9 and 10

Issue	Omission of references to relevant legislation and guidance.
Impact	Risk of the Proposed Development not being compliant with legislation and/or not following best available practice, and therefore increasing risk to the environment.
Solution	Refer to and follow all relevant guidance and legislation in further assessments and plans. See below for further details.

Additional narrative/explanation

The report either does not include or does not consistently include:

- The Environmental Permitting Regulations (England & Wales) 2016 (last revised March 2020)
- The Water Supply (Water Quality) (Amendment) Regulations 2018
- Environmental Damage (Prevention and Remediation) (England) (Amendment) Regulations 2019
- Part IIA, Environmental Protection Act 1990
- Groundwater (England and Wales) Regulations 2009
- LA113, Road drainage and the water environment, Revision 1, Highways England, March 2020.
- A new perspective on Land and Soil in Environmental Impact Assessment, IEMA, February 2022.

Document Reference(s): EIA Scoping Report, Main Text, Section 9.4.7

Issue	Section 9.4.7 does not clarify what sensitivity will be used where multiple may exist.

Impact	Risk of underestimating impacts posed by the Proposed Development to the water environment.
Solution	The Applicant should be aware that where multiple sensitive receptor impacts are noted, the highest sensitivity should be utilised.
Additional narrative/explanation The above solution helps ensure that the Rochdale envelope is being utilised and that potential impacts on receptors being under assessed and follows industry standard practice.	

Document Reference(s): EIA Scoping Report, Main Text, Section 9.4.16	
Issue	Source of information on private water abstractors has not been identified.
Impact	Risk of missing sensitive receptors.
Solution	Contact the relevant Local Authority Environmental Health teams.
Additional narrative/explanation Abstractions of <20m ³ are regulated by Local Authority Environmental Health teams. The Applicant should contact these departments to ensure all receptors are identified as a site walkover, where permission allows will be at risk of missing abstractors.	

Document Reference(s): EIA Scoping Report, Main Text, N/A	
Issue	There is no mention within the report for procedures for managing unexpected contamination encountered during and beyond construction.
Impact	Risks to controlled waters may not be adequately assessed mitigated if a protocol for how to manage unexpected contamination in accordance with Land Contamination Risk Management guidance is not established prior to DCO.
Solution	Ensure that a commitment to managing unexpected contamination is included in the outline CEMP, outline Operational Phase Environmental Management Plan (OEMP) and outline Decommissioning Plan.

Additional narrative/explanation

Our suggested process is:

1. In the event that contaminated land, including groundwater, is found at any time when carrying out the authorised development, which was not previously identified in the ES, then no further development (unless otherwise approved in writing by the relevant authorities) shall be carried out within the identifiable perimeters of the area in which the suspected contamination is located. It must be reported as soon as reasonably practicable to the Local Planning Authority, and where necessary, the Environment Agency, and the undertaker must complete a risk assessment of the contamination in consultation with the Local Planning Authority, and where necessary, the Environment Agency.
2. Where the undertaker determines that remediation of the contaminated land is necessary, a written scheme and programme for the remedial measures to be taken to render the land fit for its intended purpose must be submitted to and approved in writing by the local planning authority, following consultation with the Environment Agency.
3. Remediation must be carried out in accordance with the approved scheme under sub paragraph (2).
4. Following the implementation of the remediation strategy approved under sub-paragraph (2), a verification report, based on the data collected as part of the remediation strategy and demonstrating the completion of the remediation measures must be produced and supplied to the relevant planning authority and the Environment Agency.

We expect land contamination assessments to follow the tiered approach laid out in our [Land Contamination Risk Management \(LCRM\)](#) guidance. The preliminary risk assessment (PRA) should include historical plans of the site, an appraisal of the environmental setting (including geology, hydrogeology, groundwater and surface water receptors, potential contaminants of concern and source areas), an initial CSM describing possible pollutant linkages for controlled waters, and identification of potentially unacceptable risks.

Land contamination investigations should be undertaken by suitably qualified and experienced professionals and in accordance with [BS 5930: Code of practice for ground investigations](#) and [BS 10175: Investigation of potentially contaminated sites – code of practice](#). Soil and water analysis should be fully MCERTS accredited. Investigation, demolition, remediation, or construction works must not create new pathways or linkages to controlled waters. Clean drilling techniques may be required for boreholes that penetrate contaminated ground.

Document Reference(s): EIA Scoping Report, Main Text, Sections 10.3.12, 10.4.6 and 18.2.20

Issue	No methodology has been supplied for referenced soil surveys.
Impact	We are unable to determine if suitable method used for the type of peat, therefore full extent may be greater than referenced.

Solution	Undertake a peat survey with a method appropriate for the type of peat present.
Additional narrative/explanation Due to differing methodologies for specific peat types and localities it is important for the Environment Agency to be able to assess whether it has suitably assessed the extent of the peat present. We are pleased to read that a Stage 1 Peat Management Plan (PMP) will be prepared as a technical appendix to the ES, and a Stage 2, construction-phase PMP would be developed prior to the construction phase of the Project.	
Document Reference(s): EIA Scoping Report, Main Text, N/A	
Issue	Lack of consideration as to whether the Proposed Development would be a barrier to any lowland peat re-wetting in the catchment.
Impact	Risk of the Proposed Development impacting the neighbouring land's ability to re-wet at a later date.
Solution	The Proposed Development should be designed so that actions to re-wet neighbouring peat soils will not be impacted.
Additional narrative/explanation Lowland Agricultural Peat Task Force, June 2023 and Government Policy, EIP, 2025 support the re-wetting of lowland peat to prevent carbon loss. If considered as early as possible, impacts on the ability to re-wet neighbouring land could be prevented.	

Appendix C – Additional advice for the Applicant

Water Vole Survey

The report states that a single water vole survey was conducted, and confirms that a second survey is not planned as no evidence of water voles were found. It would have been preferable for the water vole survey report to be appended to the EIA Scoping report to allow consultees to review and make comment or recommendations. We kindly ask that we are provided with the opportunity to review the water vole survey report.

Watercourse Crossings

The following are general guiding principles to consider when designing watercourse crossings to avoid negatively affecting geomorphology and natural processes:

- Avoid unnecessary interference with natural processes. For instance, encourage use of trenchless techniques such as horizontal directional drilling (HDD) to minimise the likelihood of cables entering the water environment.
- Ensure watercourse crossing design is informed by assessment of fluvial processes and geomorphology. For example, depth of HDD crossing should consider the likelihood of vertical channel change.
- Avoid designs which present legacy risks to natural processes and geomorphology beyond the project lifespan. For example, infrastructure such as access tunnels which are left in-situ after decommissioning could be exposed by future coastal erosion or river movement, becoming an impediment to natural processes.
- Consider opportunities to deliver WFD mitigation measures/Biodiversity Net Gain (BNG) uplift as part of the design.
- Avoid preventing delivery of mitigation measures, e.g. avoid bringing cables to surface level in floodplains earmarked for future river restoration or flood defence works (including construction of bypass channels).

Notes:

- i. WFD applies to all surface waterbodies, not just those designated for monitoring purposes.
- ii. Small watercourses and WFD - watercourses with a catchment less than 10km² connected to a downstream WFD waterbody take the classification of that waterbody.
- iii. BNG guidelines indicate that structures built within 10 m of the bank top of a watercourse qualify as encroachment, which may affect the uplift score calculated using the BNG Watercourse metric.

BNG guidance is mentioned here because the Environment Agency's usual easement for structures, operations, launch pits is to be at least 8m away from the watercourse bank or landward base of fluvial defence structure/embankment (16m if

defence structure is for tidal purposes). As stated in the note above, BNG watercourse metric considers anything within 10m of bank top to be encroaching on the watercourse.

- Any potential construction, operational, and decommissioning phase impacts that the proposed scheme may have on the river must be subject to a WFD Assessment to the satisfaction of the Environment Agency.
- Any infrastructural developments on river/floodplain environments should be designed and delivered to have a minimal impact on natural river dynamics (e.g. erosion, deposition, meander migration etc.) and should not place any significant limitations on future river restoration projects.
- Geomorphologically dynamic behaviour is deemed likely to intensify in the next decades in line with Flood Estimation Handbook ([Flood Estimation Handbook \(FEH\) | UK Centre for Ecology & Hydrology \(ceh.ac.uk\)](#)). Therefore, any infrastructure developments should also take some account of the likelihood for increased lateral and vertical river dynamics anticipated to result from continued hydro-climatic intensification (e.g. 'a flood-rich epoch') over the remainder of the 21st century (i.e., future proofed designs that are not just based on present-day baseline geomorphological configuration/behaviour).
- If river crossings (bridges, culverts, and buried cables) are required as part of the development, the Environment Agency would expect to see geomorphologically robust designs that will cause minimal impacts on natural fluvial processes operating in the river/floodplain environment over the course of the 21st century.

Further guidance in regard to river crossings can be found in the following document:

- SEPA, 2010. Engineering in the water environment: good practice guide River crossings Second edition. SEPA

Watercourse sensitivity

- Care should be taken by applicants when determining watercourse sensitivity, especially the use of Q95 scores. Rivers with a higher Q95 flow are not more sensitive than rivers with a lower Q95. In the case of water quality, the reverse of this is true, with less dilution meaning a higher sensitivity to change. Some watercourses with low Q95 may also be winterbournes, and therefore cannot accommodate change easily, as they would be dry for most of the year.
- WFD designation is a method of monitoring and classifying the ecological health of the water environment and not an indication of greater or lesser sensitivity to change. Therefore, watercourses with a WFD designation are no more sensitive than those which have not been designated.
- Sensitivity to change cannot be determined from a desk study alone. When determining the sensitivity of a watercourse, the applicant should ensure that professional judgement and the results of any surveys are also incorporated into the assessment.

FRA

It is noted that an FRA will be prepared alongside the ES for the Proposed Development. As the FRA has not yet been submitted it is not possible to provide detailed comments, however we offer the following recommendations:

- **Sequential Test** - In accordance with National Planning Policy Framework (NPPF) and the sequential test (paragraph 172), development should apply a sequential, risk based approach to the location of development, taking into account all sources of flood risk and the current and future impact of climate change, to avoid (where possible) flood risk to people and property. The project should take a sequential approach where it can, if there are any opportunities for development to be located outside of flood zones 2 and 3 and into flood zone 1, this should be prioritised.
- **Flood Zones** - The FRA will need to consider the future flood extent of the design flood plus climate change which should be informed by the design life of the development. We would also recommend development be setback from watercourses and the design flood extent. This allows for future remediation, replacement, raising of flood assets in the context of a changing climate and increasing flood risk.
- **Proposed Development Lifetime** - The proposed development lifetime, including the construction, operation, and decommissioning phases should be confirmed.
- **Climate Change** - If the development is classed as essential infrastructure, then from a fluvial flood risk perspective the higher central climate change allowance should be used (70th percentile). A sensitivity test for the credible maximum scenario, which in this case would be the upper climate change allowance for fluvial flows (95th percentile), should also be completed. Essential infrastructure should remain operational during the design flood scenario.

Waste

The Waste (England and Wales) Regulations 2011 for dealing with waste materials are applicable to anyone who produces, carries, keeps, disposes of, treats, imports or has control of waste in England or Wales.

The law requires anyone dealing with waste to keep it safe and make sure they deal with it responsibly. They must only pass it to someone authorised to take it. You can find the waste duty of care code of practice here: [Waste duty of care code of practice - GOV.UK](#)

Contaminated soil that is, or must be, disposed of, is waste. Therefore, its handling, transport, treatment and disposal is subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standards BS EN 14899:2005 'Characterisation of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan'. The permitting status of any proposed treatment or disposal activity should be clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of waste material to be produced at or taken off site is hazardous waste and is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to [our website](#) for more information.

If you need to register as a carrier of waste, please follow the instructions here: [Register or renew as a waste carrier, broker or dealer - GOV.UK](#).

In order to meet the Applicant's duties under the waste hierarchy and obligations under the duty of care, it is important that waste is properly classified. Some waste (e.g. wood and wood-based products) may be either a hazardous or non-hazardous waste dependent upon whether or not they have had preservative treatments.

Proper classification of the waste both ensures compliance and enables the correct onward handling and treatment to be applied. In the case of treated wood, it may require high temperature incineration in a directive compliant facility. More information on this can be found here: [Classify different types of waste: your legal responsibilities - GOV.UK](#).

If excavated materials are to be used on the development site, you need to comply with the exclusion from the WFD article 2(1) (c) for the use of, 'uncontaminated soil and other naturally occurring material excavated in the course of construction activities, etc...') for waste controls to not apply to their use. Meeting these criteria will mean environmental permitting requirements do not apply.

Excavated materials that are recovered via a treatment operation can be re-used on-site under the CL:AIRE Definition of Waste: Development Industry Code of Practice. This voluntary Code of Practice provides a framework for determining whether excavated material arising from site during remediation or land development works are waste.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to:

- [CL:AIRE Definition of Waste: Code of Practice](#)
- [EA Regulatory Position Statement 215](#): Treating small volumes of contaminated soil and groundwater

Where the developer cannot meet the criteria, they will need an appropriate environmental permit from us or to register an exemption.

A deposit of waste to land must either be a disposal or a recovery activity. The legal test for recovery is set out in Environmental Permitting (England and Wales) Regulations 2016, and is defined in schedule 9 and/ or schedule 1A (Article 3(15) of WFD) as:

- Any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.
- We have produced guidance on the recovery test which can be viewed at [Waste recovery plans and deposit for recovery permits - GOV.UK](#).

You can find more information on the WFD here: [Environmental permitting guidance: The waste framework directive - GOV.UK](#)

More information on the definition of waste can be found here: [Legal definition of waste guidance - GOV.UK](#)

More information on the use of waste in exempt activities can be found here: [Waste exemption guides - GOV.UK](#)

The Environment Agency does not regulate non-waste operations. The person producing the material will need to decide if it is waste or a by-product. If it is waste they can consider if it meets End of Waste criteria. You can [check if your material is waste](#) or [get an opinion from the definition of waste service](#) on if a material is a by-product or meets 'end of waste' status. Please note that there is a cost for this service.

Developers must apply the waste hierarchy as a priority order of prevention, re-use and recycling before considering other recovery or disposal options. Government guidance on the waste hierarchy in England can be found here: [Waste hierarchy guidance](#).

Site Waste Management Plans (SWMP) are no longer a legal requirement in England, however, in terms of meeting the objectives of the waste hierarchy and your duty of care, they are a useful tool and considered to be best practice. Other best practice approaches are found in the [Waste Prevention Programme for England](#).

The circular economy is a concept designed to keep materials/resources in use as long as possible and maintaining the highest possible value state, thus promoting resource efficient practice and deriving economic benefits. Adherence to the waste hierarchy and adoption of best practice in relation to Resource Management Plans will help you deliver against circular economy objectives.

Observance of the waste hierarchy objectives and principles of the circular economy will depend upon the selection of the most sustainable option at every phase of a development project, from reduction through design and architecture, to the selection of the most efficient recovery process for the treatment and use of waste. The [Waste \(Circular Economy\) \(Amendment\) Regulations 2020](#) outlines those matters which must be included in SWMPs.

Where a development involves any significant construction or related activities, we would recommend using a management and reporting system to minimise and track the fate of construction wastes, such as that set out in [Publicly Available Specification PAS 402: 2025](#), or an appropriate equivalent assurance methodology. This should ensure that any waste contractors employed are suitably responsible in ensuring waste only goes to legitimate destinations.

SuDS

We note that the ES will include a commitment to development of a surface water drainage strategy to manage runoff during the operation and maintenance phase of the development. Surface water runoff management is essential for construction and decommissioning, therefore a surface water management plan should be written and submitted with the DCO application, possibly appended to the CEMP. The Applicant must commit to producing a SuDS maintenance schedule, based on the CIRIA SuDS Manual.

Surface water management strategies must be suitably designed to manage the risks from sediment, hydrocarbons, heavy metals and other hazardous substances which could get into surface water runoff and decrease water quality if these contaminants reach receiving surface watercourses. If SuDS are unmaintained, debris and/or sediment could accumulate and prevent them from effectively managing drainage.

When the ES is produced, the Applicant should make it clear which SuDS are proposed at which areas of the site, and how they will be used to improve water quality. Each SuDS will require a maintenance schedule commitment to ensure they perform optimally. This can be informed by the CIRIA SuDS Manual (C753F). The Applicant should produce a document which will explain how surface water will be managed during each phase of development.

The Government's expectation is that SuDS will be provided in new developments wherever this is appropriate. The Environment Agency supports this expectation.

Where infiltration SuDS are to be used for surface run-off from roads, car parking and public or amenity areas, they should:

- Be suitably designed

- Meet Governments non-statutory technical standards for SuDS– these standards should be used in conjunction with the NPPF and Planning Practice Guidance
- Use a SuDS management treatment train – that is, use drainage components in series to achieve a robust surface water management system that does not pose an unacceptable risk of pollution to groundwater.

Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1, a hydrogeological risk assessment should be undertaken, to ensure that the system does not pose an unacceptable risk to the source of supply.

See the Environment Agency's approach to groundwater protection, position statement G13: [Groundwater protection position statements](#).

WFD Assessment

A WFD assessment will be submitted with the DCO application, however limited references are provided in the report. If all relevant guidance is not used, WFD assessment may not be based on complete information. We advise the Applicant uses the following guidance to support the WFD assessment:

1. [Nationally Significant Infrastructure Projects: Advice on the Water Framework Directive - GOV.UK](#). This guidance summarises the requirements of The Water Environment Regulations 2017 in relation to NSIPs.
2. [Water Framework Directive assessment: estuarine and coastal waters - GOV.UK](#). This advice is not limited to estuarine and coastal waters in England, the guidance sets out general principles and a staged approach to assessment that the can be used for other water bodies such as rivers, lakes and groundwater.
3. [Map Explorer | Water Quality Explorer](#). We recommend the Applicant uses the Water Quality Explorer for available data for the baseline.

Please be aware that the next comprehensive update of classifications in all water bodies, as required in the WFD Regulations, is the 2025 classifications. Draft 2025 classification results have been finalised and can now be shared externally with stakeholders on demand via Freedom of Information request. We would suggest reviewing these classifications once released to ensure appropriate mitigation measures are in place during the construction phase of the Project.

The current (2019) status of the WFD surface water bodies within the Study Area are presented in Table 9-2. In accordance with the above comment, we advise using the more recent WFD data for the screening report. The Applicant should also provide more information on reason for chemical failure and poor ecological status.

Management Plans

A drilling fluid breakout plan and a surface water management plan are not listed in the topic specific environmental plans associated with the CEMP. We strongly advise the Applicant to add these to manage risks associated with Horizontal Direction Drilling, and minimising pollution from surface runoff, respectively.

Use of per- and polyfluoroalkyl substances (PFAS) and other substances

Q18.2 within Section 18.5.1 asks if consultees agree that human health can be scoped out of the EIA. Whilst this is outside of the Environment Agency's remit, we wish to make the Applicant aware that they should consider any risks from leading edge erosion of turbine blades, and if this could result in any PFAS, Bisphenol A (BPA) or microplastics being released into the environment. This assessment should be included in the Hydrology chapter, but may overlap with human health.

The Applicant should ensure that any bentonite used for trenchless drilling, or elsewhere in the scheme, has not been treated with chemicals containing PFAS. Fuel, oils and other chemicals, such as cleaning agents and decontaminants, should be PFAS-free wherever possible.

We recommend checking with manufacturers if the materials used in bentonite pellets contain PFAS. If the manufacturers are unknown, the Applicant should commit to using PFAS-free materials.

Abandoned Metal Mining

The Proposed Development is within proximity to surface water body GB104027069140 Marske Beck from Source to River Swale, which is known to be impacted by abandoned metal mining. South of the area a catchment study is currently being undertaken on this watercourse to identify and quantify the metal inputs. We recommend the Applicant engages with the Environment Agency to ensure any impacts during construction or operation can be mitigated.

Dewatering

The requirement for a Water Resources Abstraction License applies unless the activity is exempt under [The Water Abstraction and Impounding \(Exemptions\) Regulations 2017](#) or [RPS 368](#). The Applicant should determine the [need for an abstraction license](#) at an early stage. **We advise early consideration should be given to this, so that permitting timescales can be built into the development programme so as not to cause delays.** The Applicant is advised to contact the Environment Agency on 03708 506 506 for further advice and to discuss the issues likely to be raised or utilise our [pre-application advice service](#).

We recommend following the [Hydrological Impact Appraisal for dewatering abstractions guidance](#).

The Proposed Development may need:

- A groundwater investigation consent (section 32/3 of the Water Resources Act 1991) to construct and test pump; and
- A full abstraction licence (Water Resources Act 1991) if the volume of groundwater abstracted is greater than 20 m³/day and abstraction will occur for longer than a period of six consecutive months.

Further guidance can be found at: <https://www.gov.uk/guidance/water-management-abstract-or-impound-water#abstractions-that-need-a-licence>.

There may be a requirement for an associated [permit to discharge](#) unless an exemption applies; this should also be considered at an early stage.

Lifespan of Infrastructure

The Applicant should ensure that all below ground infrastructure is suitable for the operational lifespan of the project to minimise the risk of further preventable disturbance during this period.

Cables Left in Situ at Decommissioning

Some or all buried cables may be left in situ indefinitely at decommissioning. We do not currently have specific guidance or a regulatory position about this in the context of groundwater and land contamination. However, we recommend that cables are removed entirely at the end of the project's functional lifespan. Furthermore, we ask the Applicant to consider the potential effects of cables being left in situ, such as deterioration of plastic and metal over extended time periods, and the release of these materials into soil and groundwater.

The Applicant should refer to regulatory guidance and general best practice at the time of decommissioning. Whilst the current intention may be for these to be left in the ground, we strongly recommend that the Applicant considers full cable removal in their designs. Allowance should be made at this stage for cable removal should it be later deemed necessary, so that the method of installation does not mean this cannot be reasonably achieved.

It is important to consider that use of plastic ducting to facilitate easy removal of cables may have its own impacts. This ducting could degrade over time in a similar manner to plastic cable housing, with some residual risk to sensitive receptors.

The Environment Agency expects developers and operators to assess the area of influence of their activities and to take account of all current and future groundwater uses and dependent ecosystems. Developers and operators are expected to assess and mitigate the potential impact on groundwater, throughout planning, construction, operation, and decommissioning phases of the development or operation.

Fluid-Filled Cables

We have not identified a description of the type of cables to be used.

The Environment Agency will normally object to pipelines or fluid-filled cables that transport pollutants, particularly hazardous substances that:

- Pass through SPZ1 or SPZ2 where this is avoidable
- Are below the water table in principal or secondary aquifers

If cables containing hazardous fluid are to be left in the ground indefinitely, we consider it likely that leakage will occur in the long term. This would be uncontrolled and unmonitored, posing a potentially unacceptable risk to controlled waters.

Flood Risk Activity Permits (FRAPs)

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- Erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- Altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- Building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- Dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- Diverting or impounding the flow of water or changing the level of water in a main river
- Quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- Any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- Any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- Any activity within 16 metres of a sea defence structure
- Activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

The Applicant should not assume that a permit will automatically be forthcoming once a DCO has been approved, and we advise the Applicant to consult us at the earliest opportunity.

Disapplication of FRAPs

If any of the works are likely to require a FRAP, we recommend that you inform the

Environment Agency at the earliest opportunity as to whether you are seeking to disapply the Environmental Permitting Regulations (England & Wales) 2016 for flood risk activities as part of the DCO (minimum 6 months before submission). Please note that the DCO will need to include protective provisions for our benefit if the disapplication of FRAPs is sought.

Hello,

Thank you for seeking the Forestry Commission's advice about the impacts that this application may have on the trees and woodland identified in this proposed application. As a Non-Ministerial Government Department, we provide no opinion supporting or objecting to an application. Rather, we are providing information on the potential impact that the proposed development could have on trees and woodland habitats. The Forestry Commission is pleased to provide you with the following information that may be helpful when you consider the application:

- Details of Government policy relating to ancient woodland, ancient trees and veteran trees
- Information on the importance and designation of ancient woodland, ancient trees and veteran trees
- Details of Government policy relating to non-ancient woodland and trees

Ancient Woodlands (ASNW/PAWS) and Ancient & Veteran Trees (AVT)

Ancient woodlands (AW), ancient trees and veteran trees (AVT), are irreplaceable. They have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW), Plantations on Ancient Woodland Sites (PAWS)/Ancient Replanted Woodland (ARW), ancient trees and veteran trees. It is Government policy to refuse development that will result in the **loss or deterioration** of irreplaceable habitats including **ancient woodlands, ancient trees and veteran trees**, unless "there are wholly exceptional reasons and a suitable compensation strategy exists" (National Planning Policy Framework paragraph 186c). It is not possible to fully compensate for the loss of an irreplaceable habitat.

The Forestry Commission advises that the most up-to-date Ancient Woodland Inventory (AWI) should be used throughout the assessment process. The inventory has recently been updated. The Applicant should also refer to the Woodland Trust's Ancient Tree Inventory (ATI) and any other relevant datasets to identify ancient trees and veteran trees that may be affected by the proposed development. The ATI should not be considered an exhaustive dataset of all ancient trees and veteran trees, and an arboricultural assessment should be undertaken to identify all ancient trees and veteran trees, including those not recorded in the inventories/datasets above, within the Scoping Boundary, or potentially impacted by the proposed development. Assessments should consider all potential impacts to ancient woodland, ancient trees and veteran trees arising from construction, operation, maintenance and decommissioning activities across the lifetime of the project.

The Scoping Report identifies two areas of ancient woodland, both approximately 50m from the Scoping Boundary; Barningham Wood (PAWS/ARW, grid ref: NZ 0873 0991) and Lockey Wood

(ASNW, recorded as unnamed in the Scoping Report, grid ref: NZ 0533 0551). The Woodland Trust's Ancient Woodland Inventory (AWI) also records at least 16 ancient or veteran trees within the Scoping Boundary and a further approximately 15 that appear to be within 50m of the Scoping Boundary, close to Lockey Wood, however these ancient/veteran trees do not appear in the Scoping Report. As irreplaceable habitat they should be scoped into the Environmental Impact Assessment of the site. There is also an area of Wood Pasture and Parkland adjacent to Barnigham Wood which does not appear in the Priority Habitat Inventory or Scoping Report, but may contain irreplaceable habitats in the form of ancient and/or veteran trees.

Standing Advice for Ancient Woodland, Ancient Trees and Veteran Trees

Natural England and the Forestry Commission have published standing advice on ancient woodland, ancient trees and veteran trees, which should be consulted where development occurs close to these irreplaceable habitats. The standing advice provides information on the nature of potential direct and indirect impacts from development, on ancient woodland, ancient trees and veteran trees. It also provides more detailed information on mitigation, including the use of buffers. Further technical information is set out in Natural England and Forestry Commission's [Standing Advice on Ancient Woodland](#) – plus supporting [Assessment Guide](#) and [“Keepers of Time” – Ancient and Native Woodland and Trees Policy in England](#).

The standing advice states that 15 m represents the **minimum** buffer that should be provided for ancient woodland, however it makes clear that this may not be sufficient in all circumstances. For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. Where assessment shows other impacts are likely to extend beyond these distances, the proposal is likely to need larger buffer zones.

Buffer distances should be informed by site-specific assessment and should be sufficient to avoid deterioration of ancient woodland, ancient trees and veteran trees, arising from direct, indirect and cumulative impacts. Assessments should include, but not be limited to, impacts on root protection areas, hydrology, soil compaction, edge effects, shading, pollution, vibration, dust, construction activity, access requirements, operational maintenance and decommissioning. Where possible, a buffer zone should contribute to wider ecological networks and be part of the green infrastructure of the area. Buffer zones should consist of semi-natural habitats such as woodland or a mix of scrub, grassland, heathland and wetland. The proposal should include creating or establishing habitat with local and appropriate native species in the buffer zone.

Biodiversity Duty and Policy Context

Under Section 40 of the Natural Environment and Rural Communities Act 2006, as amended by the Environment Act 2021, public authorities exercising functions in relation to England

(including under the planning system) must consider what action they can properly take to further the conservation and enhancement of biodiversity and take appropriate action consistent with the proper exercise of their functions.

The Environmental Statement should demonstrate consideration of the Environment Act 2021 biodiversity targets, including the statutory targets to:

- Halt the decline in species abundance by 2030
- Increase species abundance so that by 2042 it is greater than in 2022, and at least 10% greater than 2030
- Improve the Red List Index for England species extinction risk by 2042, compared to 2022 levels
- Restore or create in excess of 500,000 hectares of wildlife-rich habitats outside of protected sites by 2042. A new interim target was also set within the EIP23 to restore or create 140,000 hectares of a range of wildlife-rich habitats outside protected sites by 2028

These targets are directly relevant to trees, woodlands, hedgerows and associated habitats within the scheme.

Woodland Loss, Tree Canopy and Compensatory Woodland Creation

Government policy strongly supports **increasing tree and woodland cover in England**, including commitments to:

- Reach **16.5% tree and woodland cover in England by 2050** (Tree Action Plan for England)
- Increase woodland creation rates to support net zero and biodiversity objectives
- Deliver landscape-scale nature recovery through the Environmental Improvement Plan 2023
- Contribute to the England Trees Action Plan ambition to expand woodland creation and tree canopy cover

Where tree or woodland loss is unavoidable, the Forestry Commission encourages the applicant to provide robust justification and to consider significant compensatory woodland creation, planting of trees outside of woodlands, hedgerow creation and habitat enhancement measures that exceed the area of permanent woodland and tree canopy loss or deterioration, and contribute positively to local woodland networks and landscape-scale connectivity. Any

woodland creation planned as part of biodiversity net gain/enhancements plans should follow the UK Forestry Standard (UKFS) and may require its own Environmental Impact Assessment. Notably there is peat blanket bog in the area of the proposal and this may influence where trees can be planted.

Conclusion

The Forestry Commission advises that the Environmental Statement should clearly demonstrate how the mitigation hierarchy has been applied, with avoidance of impacts to ancient woodland, ancient trees and veteran trees.

Where impacts cannot be avoided, the assessment should provide robust evidence that direct, indirect and cumulative effects during construction, operation, maintenance and decommissioning have been identified and reduced as far as possible, supported by appropriate mitigation, buffering and habitat enhancement measures.

Particular attention should be given to avoiding deterioration of irreplaceable habitats and maintaining or strengthening habitat connectivity across the wider landscape.

We hope these comments are helpful to you. If you have any further queries please do not hesitate to contact the Forestry Commission on the email address provided.

Many thanks,

Dan Brown

Local Partnership Advisor

Yorkshire and North East Area

Foss House, King's Pool

1-2 Peasholme Green

York

YO1 7PX

Date: 17 June 2026
Our ref: EIASCO/26/03
Your ref: EN0110038

The Planning Inspectorate
Environmental Services
Infrastructure Decisions
and Applications Service
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

For the attention of : Emily Park

By email to : [HopeMoorWind Farm@planninginspectorate.gov.uk](mailto:HopeMoorWindFarm@planninginspectorate.gov.uk)

Dear Ms Park

APPLICATION BY FRED OLSEN RENEWABLES FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE HOPE MOOR ONSHORE WINDFARM DEVELOPMENT IN DURHAM AND NORTH YORKSHIRE (23 WIND TURBINES UPTO 200 METRES).

(EIA) SCOPING CONSULTATION AND NOTIFICATION OF ENVIRONMENTAL IMPACT ASSESSMENT.

Thank you for your letter dated 29 May 2026.

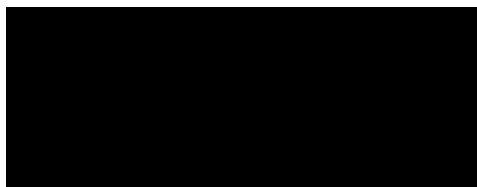
I understand that the applicant has asked the Planning Inspectorate on behalf of the Secretary of State for its opinion (a scoping opinion) as to the information to be provided in the Environmental Statement (ES) to the proposed development, which is a Nationally Significant Infrastructure Project (NSIP). It is noted that the proposed development is currently in the pre application stage.

I have reviewed the information accompanying the request for a scoping opinion, via the link contained in your letter, and can confirm that Gateshead Council has **no comments** to make on the information to be provided in the Environmental Statement in this instance, given that the site/proposed development is a significant distance from the administrative boundary of Gateshead Council.



Should you wish to discuss this response further then please contact me on [REDACTED] or at [REDACTED] [@gateshead.gov.uk](mailto:[REDACTED]@gateshead.gov.uk).

Yours sincerely



Senior Planner
Development Management
Climate Change, Compliance, Planning and Transport
Economy Innovation and Growth
Gateshead Council

**Development, Neighbourhoods &
Regulatory Services**

Email: developmentcontrol@hartlepool.gov.uk

Civic Centre Level 1
Hartlepool TS24 8AY

Tel: 01429 266522
DX60669 Hartlepool-1



Our Ref: H/2026/0179

Your Ref: EN0110038

Contact Officer: [REDACTED]

25 June 2026

PLANNING INSPECTORATE
ENVIRONMENTAL SERVICES
INFRASTRUCTURE DECISIONS AND APPLICATIONS SERVICE
C/O QUADIENT
69 BUCKINGHAM AVENUE
SLOUGH
SL1 4PN

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

PROPOSAL: Adjoining Authority Consultation for a scoping opinion for the
Hope Moor Wind Farm

LOCATION: HOPE MOOR WIND FARM

I refer to the above noted application.

Having viewed the supporting documentation in respect of the EIA Scoping and Consultation and Regulations 10 and 11 Notification, I have set out the responses I have received from various Hartlepool Borough Council technical consultees below for your consideration:

HBC Heritage and Open Spaces

The proposal does not impact on any listed or locally listed buildings, nor any conservation areas in Hartlepool.

HBC Traffic and Transport

There are no highway concerns with this proposal.

Tees Archaeology

Thank you for the consultation. The proposed development lies outside of our remit and archaeological matters will be dealt with by the relevant local archaeological advisor.

HBC Building Control

I can confirm that we do not require a Building Regulation application for Adjoining Authority Consultation for a scoping opinion for the Hope Moor Wind Farm.

HBC Land Use Policy

No comments to make.

Other Consultees

Comments were not received from the consultees listed below. You should not take the lack of comments from respective consultees as an indication of no objection or requirements, however should you wish to gain an understanding of the views of additional consultees, I have set out the relevant contact details for your consideration.

HBC Public Protection: environmental.protection@hartlepool.gov.uk

HBC Engineering Consultancy: [REDACTED] [@hartlepool.gov.uk](mailto:[REDACTED]@hartlepool.gov.uk)

HBC Arboricultural Officer: [REDACTED] [@hartlepool.gov.uk](mailto:[REDACTED]@hartlepool.gov.uk)

If you would like any further information about the Council's decision please contact your case officer Stephanie Bell quoting the reference number given above.

Yours faithfully

[REDACTED]

Senior Planning Officer

CEMHD Policy - Land Use Planning,
NSIP Consultations,
Building 1.2,
Redgrave Court,
Merton Road,
Bootle, Merseyside
L20 7HS.

HSE email: NSIP.applications@hse.gov.uk

By email only:
HopeMoorWindFarm@planninginspectorate.gov.uk

Dear Ms Emily Park (PINS)

Date: 10 June 2026

**PROPOSED HOPE MOOR WIND FARM (the project)
PROPOSAL BY FRED OLSEN RENEWABLES LTD (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as
amended) REGULATIONS 10 and 11**

Thank you for your letter of 29 May 2026 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records, the proposed **Hope Moor Onshore Windfarm** project components as specified in the ***Environmental Impact Assessment Scoping Report Volume A: Figures EN0110038 May 2026, Figure 2.1, drawing title 'WIND FARM ARRAY AREA AND HAUL ROUTE SEARCH AREA'***, **does not** appear to cross the Consultation Zones of Major Accident Hazard (MAH) sites and MAH pipelines.

Hazardous Substance Consent

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended.

HSC would be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the controlled quantities set out in Schedule 1 of these Regulations.

If hazardous substances planning consent is required, please consult HSE on the application.

Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 Annex on the Planning Inspectorate's website - [Annex G – The Health and Safety Executive](#). This document includes consideration of risk assessments on page 3

Explosives sites

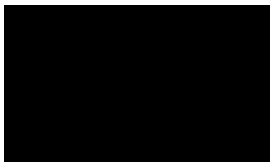
Explosives Inspectorate has no comment to make as there are no HSE licenced explosives sites in the vicinity of the proposed development.

Electrical Safety

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk . We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely



CEMHD4 NSIP Consultation Team

Privacy Notice details

English

Privacy information

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Direct Dial: 01904 601858

Our ref: PL00802022

PINS ref.: EN0110038

By email

Date: 17 June 2026

Dear Madam or Sir,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Proposed application by Fred. Olsen Renewables Ltd (the applicant) for an Order granting Development Consent for the Hope Moor Wind Farm (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Thank you for your communication of 29 May 2026 consulting Historic England on the above EIA Scoping Report. This relates to a proposal for the construction of up to 23 wind turbines with a tip height of up to 200m across an area of 1,111 hectares of land and associated infrastructure.

Our advice is based on Consultation Documents provided as a link to the online documentation website (see appendix), and our statutory remit with its focus primarily on higher-graded heritage assets.

Historic England's Advice

Having reviewed the EIA Scoping Report and associated Figures and Appendices, this proposal has the potential to have direct and indirect impacts on heritage assets, both designated and undesignated.

The EIA is therefore necessary to understand these impacts and ensure that they are properly considered when a planning decision is taken. The Scoping exercise is important in ensuring that the EIA is appropriate.

General observations

1. We do not support the approach suggested by the applicant to scope into the EAI all heritage assets within 10km, and to scope out all such assets beyond this distance

Such a scoping exercise should be based on an analysis of the significance of the heritage assets, and decisions on inclusion/exclusion made after the assessment and evaluation phase.

We recommend to scope in and out more general topics of impact during the construction, operation and decommissioning of the wind farm instead of focussing on individual heritage assets at this stage.

In regard to heritage assets, we need to point out that a flexible approach to impact assessment and study areas would be welcomed in relation to results from surveys and evaluations during the preparation of the EIA.

Specific observations

1. Four designated heritage assets lie within, or on the boundary of, the draft Order Limits, and therefore need particular attention as part of the EIA:
 - The scheduled monuments of How Tallon round barrow and cup marked stones (NHLE 1010540)
 - Cairn near the summit of Low Ridge, 850m southwest of Crocker Stake Nook, Hope Moor (NHLE1017427)
 - Prehistoric Settlement and associate remains, including carved rocks and a stone circle 400m north of How Tallon Cairn, Barningham Moor (NHLE 1017441)
 - Cairnfield on a small knoll at Badger Way Stoop, Barningham Moor (NHLE 1017445)
2. We note that **Scoping Report Volume B (Appendix 6A)** has scoped out the scheduled monument of the How Tallon round barrow and cup marked stones (NHLE 1010540) in the list of designated heritage assets. No reasons for this have been provided.

The provided GIS data suggests that this heritage asset falls within the draft Order Limits and should therefore be included and assessed.

3. We do not support the preliminary scoping exercise for individual monuments in **Scoping Report Volume B (Appendix 6B) and table 6-5 and 6-6** of the main text.

Such sites should not be scoped in or out at this point of the analysis.

We assume that the exercise is based solely on the ZTV analysis. Historic England's guidance on setting of heritage assets (which has been referenced by the applicant in this regard), states that the significance of heritage assets provided by their setting is not solely based on views

This work needs to consider other key factors as impact associated with settings, such as noise, cumulative impact and different seasons, etc.

We would expect the methodology for the assessment of settings, taking into account our guidance as set out in our guidance, to be included in the ES as an Appendix.

Section 6.4.8 also mentions heritage assets scoped out based on the ZTV. Historic England does not agree to scope out specific designated heritage assets solely on the ZTV without further settings assessments. We welcome the offer of the applicant to discuss this further.

We would be happy to advise the applicant to understand the requirements in this regard going forward.

4. The **Scoping Report, section 6.4.3** states that ‘all nationally significant designated heritage assets’ within the 10km study area will be subject to a settings assessment and further scoping based on these assessments.

This approach, but it contradicts the scoping in and out of these heritage assets in **Appendix B** (see general observation above). This needs clarification, as our position is that a scoping exercise at this point is not possible.

5. **Section 6.6.7 and 6.6.8** confuses potential direct impacts and impacts on the setting of designated heritage and it is not clear what is scoped in and out.
6. In the Scoping Report further consultation with stakeholders after receipt of the scoping opinion is stated in **section 6.8.4**.

Historic England welcomes further opportunities to engage with the applicant. It is essential to identify and mitigate impact on heritage assets resulting from an iterative process of assessment and analysis.

7. We would recommend scoping in a potential to enhance the heritage assets impacted on by the Proposed Development through improved interpretation or active community engagement. However, there is no intention by the applicant to consider how the proposed development can contribute to this.

Section 17.3.15 of the Scoping Report provides a wide range of ‘Socio-economics’ related to tourism. History and Heritage have been identified as one driver of tourism.

It is beneficial for such projects to include considerations about the active involvement of the public in archaeological mitigation.

As such, Historic England would be happy to work with the applicant to provide examples and advice on public engagement for the wider benefit of the community.

Questions for consultees

Q6.1: Do consultees agree with the methodology set out, including the use of UAV in areas which are assessed to be a health and safety issue for industry standard surveying? Yes

Q6.2: Do consultees agree with assets and matters scoped out? No – see above details on the issue with single designate heritage scoped out solely on the assessment of ZTV at this early stage of the NSIP process.

Q6.3: Are there any assets, not listed in the appraisal, that key consideration should be given to? Yes, see above details.

Q6.4: Do consultees have any specifications on further visualisations and their locations? Yes, but this should be a topic that is discussed in online meetings, and we recommend that the applicant sets up an initial meeting with Historic England to allow us to provide optimal advice on specific issues.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely

[Redacted Signature]

Inspector of Ancient Monuments

E-mail: [Redacted] [@historicengland.org.uk](mailto:[Redacted]@historicengland.org.uk)

Appendix – consultation documents

The documents which the following comments refer to are:

- EN0110038 Hope Moor Wind Farm – Environmental Impact Assessment – Scoping Report: Main Text
- EN0110038 Hope Moor Wind Farm – Environmental Impact Assessment – Scoping Report Volume A: Figures
- EN0110038 Hope Moor Wind Farm – Environmental Impact Assessment – Scoping Report Volume B: Appendices

By email

22nd June 2026

PINS Scoping Consultation on Hope Moor Wind Farm

Response from Marske and New Forest Parish Council (MNFPC)

**The Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11.
Application by Fred Olsen Renewables (the Applicant) for an Order granting Development Consent for the Hope Moor Wind Farm (the Proposed Development)**

Thank you for your email of 29 May 2026 relating to the consultation on the Applicant's request for a Scoping Opinion from the Planning Inspectorate on behalf of the Secretary of State.

The Parish of Marske and New Forest is one of the four parishes within which the proposed windfarm is sited. The others are Hope, Barningham and Newsham. Both Marske and Newsham are in North Yorkshire; part of Marske is also within the area of the Yorkshire Dales Park Authority. Both of the higher authorities are Planning Authorities.

There are more turbines planned within Marske and New Forest than in any other parish (9 out of the proposed 23 turbines). Around 40% of the area of the proposed windfarm array is within our parish, and about 90% of the drainage from the windfarm array is in the catchment of Marske Beck and flows through the Parish. Without further information we must also assume that the area within the Parish may also include borrow pits, parts of the construction haul route, internal access tracks, newly constructed drainage and other project components.

I am writing on behalf of Marske and New Forest Parish Council ("MNFPC") to provide the Council's response on the Hope Moor Wind Farm Environmental Impact Assessment Scoping Report (May 2026). The response is provided in the attached document in tabular form. We have organised the table in line with the Chapters and paragraphs in Olsen's report, and identified where we think the Planning Inspectorate should reflect our comments in its Opinion.

I would like to draw to your attention to our substantive comments around the following topics:

- The exclusion of considerations relating to an electrical grid connection (see 2.5.47-52);
- The limited range of alternatives which the work plans to consider (2.9.3-2.9.5);
- The heavy reliance on Scottish guidance documents (comments on Chapter 3);
- Matters relating to the inadequacy of consultation (3.1.2-3.1.3)
- Significant limitations in the assessment of landscape and visual impacts (Chapter 5)
- The importance of Intra-project effects (3.11.18), and effects on health (Chapter 18)
- The lack of any analysis on impacts on farming (Chapter 17)

Whilst our comments on consultation issues generally are set out below we would like to draw your attention here to the timing of this Scoping Consultation, which is running concurrently with a wider public consultation on the wind farm plans. In our view this is both irregular and highly unsatisfactory. As a Parish Council, in an area with a population of around 100, we are

expected to draw up consultation responses to two consultations in parallel. The imposition of two consultations at once is grossly unfair.

There has been no direct pre-application discussion between Council and the applicants to date on matters relating directly to the parish. We are unaware as to whether the developer intends to put in place a Planning Performance Agreement with our Council, and/or other parishes in a similar position. It is likely further information on technical details will be requested by the Council subsequent to this Scoping Response.

Please let me know if you require any further information.

Yours sincerely

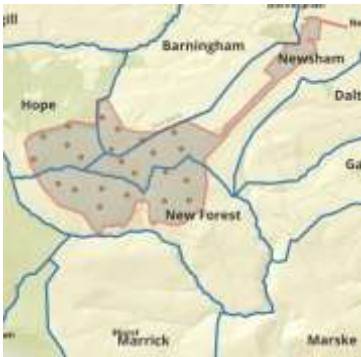
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Clerk to Marske and New Forest Parish Council

PINS Scoping Consultation on Hope Moor Wind Farm

Response from Marske and New Forest Parish Council (MNFPC)

This document provides in table form our response to the EIA Scoping Report (“SR”), in respect of Fred Olsen. Renewables (“Olsen”) (“the Applicant”) application for development consent for the Hope Moor Wind Farm (“the Proposed Development”).

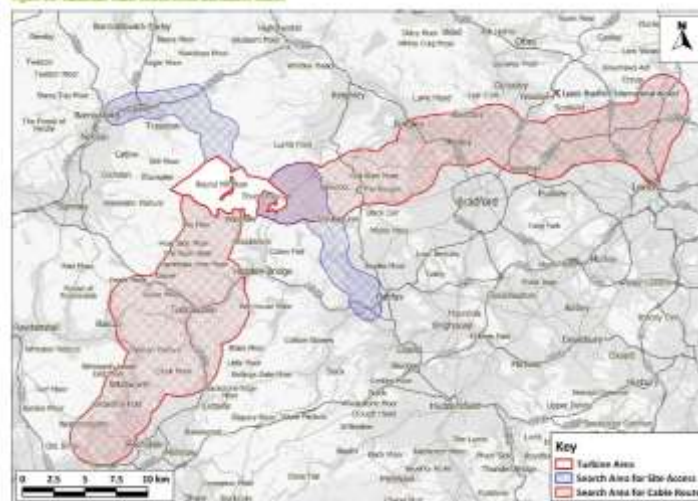
Scoping Report Reference	Topic/Issue	Marske and New Forest Parish Council Response
1. Introduction		
		The Parish of Marske and New Forest is one of the four parishes within which the proposed windfarm is sited (see map). The others are Hope, Barningham and Newsham. There are more turbines planned within Marske and New Forest than in any other parish (9 out of the proposed 23 turbines). Around 40% of the area of the proposed windfarm array is within our parish, and about 90% of the drainage from the windfarm array is in the catchment of Marske Beck and flows through the Parish.  Our substantive comments are made in the table below. We have had only a limited time to review this report and reserve the right to make comments later.

2. Project Description		
2.3.2	Scoping Boundary	We do not agree that the Scoping Boundary captures a reasonable worst-case scenario. As set below we do not agree that the Scoping Boundary should exclude the connection to the National Grid. A convincing case has not been made by Olsen for excluding impacts related to the grid connection. See 2.5.47 to 2.5.52 below. We ask that the Planning Inspectorate Opinion includes a statement that Scoping Boundary should include the grid connection. Our reasons for this are set out below.
2.5	Key Project Components	The Scoping Report does not include the likely number of, and dimensions of, most of the components listed in the 2nd and 3rd bullet points of para 2.5.1. This may lead to consultees overlooking certain environmental impacts. We reserve the right to make comments on any of these components later.
2.5.23-24, 2.53-55	Site Access and Off-Site Highway Works	Para 2.5.23 does not set out how the “haul route search area” has been identified. The search area is predominantly a narrow strip of around 100m. It is unclear whether the southernmost part of the haul route might be within our Parish Boundary in the vicinity of Long Green Gate and Frankinshawe Howe. We do not agree that only two options for the haul road should be included within the Scoping. Neither the Scoping Report, nor the public consultation, make a case for why only two options have been considered. Feedback from the public consultation, which closes after the consultation on the Scoping Report, is likely to ask for other options to be examined. The Planning Inspectorate should not accept a Scoping Boundary which limits options for Site Access.
2.5.34	Borrow pits	The environmental impacts of borrow pits may be significant. The Around 40% of the windfarm area is within our parish. We ask that the Inspectorate reflects on the need for a description of how the environmental impacts specific to borrow pits will be measured.
2.5.47 to 2.5.52.	Grid Connection	From the perspective of Marske and New Forest Parish Council we would take comfort in the exclusion of any grid connections that might traverse the Parish. As the proposals stand we cannot have any certainty about this. We ask that the Inspectorate does not confirm Olsen’s suggested approach that the grid connection and electricity generation facility are treated as separate consenting processes. If Olsen chose to proceed in their EIA work without including the grid connection it should be at their risk and be a matter that is determined during the Examination of their Application.

A resident of our Parish was told by Olsen at a Drop-in session in November that the “DCO application will include (1) plans for the wind farm footprint, including turbine locations and heights, (2) plans for transporting materials to the site, and (3) plans for connections to the grid.” (We can evidence this discussion if required.) It is surprising to us therefore that this position had changed materials in the materials that make up the current 6 May- 30 June public consultation. We feel this change of approach by Olsen places all consultees at a disadvantage in countering legal arguments for the exclusion of the grid connection from the DCO. This is especially the case in as the current PINS consultation is limited to four weeks.

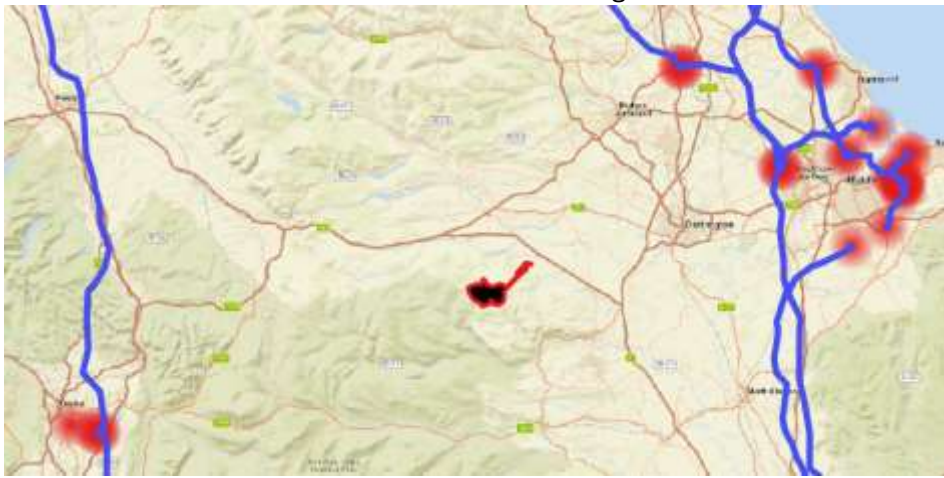
There are many examples of where a grid connection has been planned as part of the same consenting process for the generating facility it serves. The most relevant and recent example is for the 200m wind turbine farm at Calderdale Energy Park (see figure below). This is only other English windfarm DCO application we are aware of.

Figure 4.2: Calderdale Cable Search Areas and Access Routes



Extract from Calderdale Energy Park Scoping Report showing four grid connection options

The EIA Scoping Report for the Calderdale windfarm was deposited with PINS in September 2025 (Reference: EN0110023). The plan includes four options for the grid connection (see their figure 4.2 above). One connection option is in Rochdale, two are in Bradford and one is in Leeds – these points are between 20km and 40km from the wind farm (e.g. see Chapters 4 and 5 in that report). The inclusion of these cable route options is accompanied by plans for in-scope environmental assessments across a range of aspects including ecology/biodiversity,

		hydrology and cultural heritage impacts. Consultees in the Calderdale application will have been made aware of impacts of all infrastructure associated with the construction and operation of that wind farm. In para 2.5.49 Olsen do identify other DCOs where transmission infrastructure does not form part of projects (e.g. Hinkley Point C). Whilst we accept that the point of connection to the grid for Hope Moor is not yet confirmed (2.5.50) the Scoping Report does not set out a compelling justification for not including grid connection options. The case of Calderdale illustrates very clearly that there is no reason to exclude the grid connection options from the scoping of a >100MW wind farm in the English Pennines. Whilst we understand that legal precedents illustrate what <i>could</i> be proposed the Olsen document does not set out why the Scoping <i>should</i> exclude grid connection options. The example of Calderdale demonstrates that contrary to the Olsen's concluding assertion (Appendix B, para 1.7.3) it is possible to carry out a meaningful assessment of the grid connection infrastructure. In summary we refute the exclusion of grid connection infrastructure in the Scoping the following reasons. 1. Precedent. The Calderdale case is an example of a recently Scoped DCO for a windfarm of more than 100MW in the English Pennines. In this case the Developer and the Inspectorates Opinion both support the Scoping of the Project on that basis. 2. Options. We believe that the number of National Grid substations relevant to the Hope Moor Wind Farm are likely to be limited to the two or three nearest sites on the National Grid network in the North East (see map below, which excludes a further substations near Harrogate and York to the south of Marske).  Site of Hope Moor windfarm in relation to National Grid (blue) and National Grid substations (red circles)

		We do not understand therefore why the applicant has not scoped in options for transmission corridors as has been done in the case of Calderdale where four substations have been included as options. 3. Sole user of grid connection. The Hope Moor Wind Farm site is unique amongst proposed renewable energy generating sites in North Yorkshire (including solar sites) in being remote from the grid. We are not aware of any other demands for electricity generating sites in or around the area between Hope Moor and the any likely grid connection point (see Table 3-2). Hence we argue that the Hope Moor Wind Farm uniquely needs its own grid connection. It therefore seems to us that the grid connection is entirely part of the Hope Moor Wind Farm project, regardless of the delivery mechanism. To argue to the contrary suggests that there may be other plans in the pipeline for electricity generating sites that we are not aware of. The sections in the Scoping Report on cumulative impacts do not consider such other projects as being “reasonably foreseeable” (section 3.11). Needless to say were it to become apparent that other such projects were foreseeable then there would be a need re-evaluate any cumulative effects as part of the Hope Moor Project Scoping. 4. Project timing. Olsen’s project plan for the Wind Farm includes making a DCO application in 2027 and receiving a decision in 2029 (see “Vision” document as part of concurrent public consultation (6 May-30 June). Para 2.6.1 in the Scoping Report notes that construction could commence in 2030, and that subject to consent being granted for the project that it <i>would</i> (our italics) become operational in 2031 (para 2.7.1). For this to be the case it will be necessary to secure consents for the grid connection within the same timescales as the turbine array. This presents another rationale for Scoping a single consenting process for all of the elements to take place at the same time.
2.6.1	Construction and Project Programme	As an observation we think it would be helpful if Olsen set out a timeline for the Project all in one place. We have based our response on the dates below: • Late 2026: Second public consultation • Mid 2027: DCO submission • Autumn 2028: Examination • 2029 (estimate): Recommendation and Decision • 2030 Commence Construction (2.6.1.) • 2031 Project becomes operational (2.7.1 - subject to consents) • 2061 End of operational life (2.7.1). A programme timeline should also include milestones for the grid connection which include (i) acceptance of proposals by the network operator, (ii) timing of consents processes and (iii) the beginning and end dates for construction. Note para 2.7.1 suggests that the grid connection would be operational within 2031.

2.9.3 – 2.9.5	Consideration of Alternatives	Para 2.9.5 suggests that the consideration of alternatives should be limited to different site layout and project refinements. The proposed approach to alternatives suggested by Olsen is treating minor changes in facilities as alternatives, and is not dissimilar to their approach to managing design uncertainty and the Rochdale Envelope (2.4, and 3.4.1). We are familiar with the scoping of the A66 DCO project, and an approach to alternatives that looked at radically different options from those that were approved in the eventual DCO. No such breadth of analysis has been made public with respect to this Project. Section 4.5.8 lists factors that influenced the selection of the site at Hope Moor, albeit that they conspicuously omit the lack of a grid connection. The same factors listed in 4.5.8 might also apply to other sites near the Hope Moor Site. Olsen should include such sites in their analysis of alternatives. We would like to see the Planning Inspectorate ask that the consideration of alternatives should be broader than alternatives <i>within</i> the proposed development, and should include sites with alternative Scoping Boundaries.
2.9.6	“Do-nothing” and “No Development”	We agree that a do-nothing or no-development scenario is inconsistent with government policy, and that reasonable alternatives in the ES should not include such scenarios. However in the definition of project impacts it would then be inconsistent to then measure those impacts against the standpoint of “no-development”. The question that the ES, and its examination of alternatives should address, is not whether an on/offshore wind project at Hope Moor is the right thing for UK plc, but whether the choice of the site at Hope Moor is sound compared to other possible on/offshore sites. We therefore reiterate the point made in relation to paras 2.9.3.-2.9.5 that the consideration of alternatives should include sites with alternative Scoping Boundaries.

1. Approach to EIA		
Chapter 3. Overall comment	Guidance documents. Reliance on Scottish guidance	The Scoping Report lists many guidance documents published by NatureScot (formerly Scottish Natural Heritage). The use of Scottish guidance in the Olsen report covers a range of subjects as varied as badgers, visual impacts of windfarms, and cultural heritage. Using Scottish Guidance in an English Planning and Environmental context, without comment, is deeply flawed. The Scoping Report is drafted without comment as to whether it is appropriate to use guidance developed for planning decisions in a part of the UK that has separate planning legislation to England. Furthermore the Scoping Report is drafted without comment as to whether it is appropriate to use guidance developed for Scotland where the background to environmental, ecological and cultural matters is different from England. The omission of Access land (see comments on 11.3.14 etc) is a good example of where Olsen (as a primarily Scottish developer in a UK context) have looked at this Project from a Scottish Perspective, relied heavily on Scottish guidance, and given little consideration to specifically English matters. Scottish Guidance would give no weight to any considerations around Access Land as the Scottish legal framework does not have such a concept. There may be other less obvious, but potentially more important areas of the Scottish legal context that renders applying Scottish guidance to an English Planning process unreliable. We ask that the Inspectorate to reflect in their Opinion the following: • That Scottish guidance is not used where there is relevant guidance in relation to England; • That where Scottish guidance is used it is demonstrated to be a last resort. In these cases we think it is reasonable to ask Olsen to provide evidence that they have pressed the relevant English authorities to develop parallel guidance for England; • That where Scottish guidance is available, and it is Olsen's intention to use that guidance, that an issue-by-issue analysis is carried out and published to assess the relevance and limitations of using that guidance in an English context. Where Scottish guidance is used in this Scoping Report we have commented separately below.
3.1.2, 3.13	Introduction + Consultation and Engagement	The Parish of Marske and New Forest is one of the four parishes within which the proposed windfarm is sited. There are more turbines planned within the Parish than in any other parish (9 out of the proposed 23 turbines). Around 40% of the area of the proposed windfarm array is within our parish, and about 90% of the drainage from the windfarm array is in the catchment of Marske Beck and flows through the Parish.

		Para 3.13.3 notes that “the applicant acknowledges that consultation and engagement will play a central role in shaping the design of the project by helping to identify .. local considerations .. that should be taken into account from an early stage”. We have three comments to make on this: 1. Apart from a single “drop-in” session in November, Olsen’s consultation has been limited to a consultation of the “Vision for Hope Moor” which began on 6 May and is due to close on 30 June. Olsen have chosen to deposit their Scoping Report to PINS, thus triggering the PINS consultation (from 29 May to 26 June) which ends before the concurrent public consultation. It is therefore the case that the Scoping Report has not included any consultation feedback. • The omission of Access Land is a good example of the ineffectiveness of an Olsen consultation schedule based on two concurrent consultations (i.e. the informal public consultation (6 May-30 June) and the statutory Scoping Report consultation (29 May-26 June). A consultation strategy that allowed time for Olsen to reflect on the feedback received in their public consultation would have led to them being able to reflect considerations of Access Land in their Scoping Report. There may be other substantive issues raised in the public consultation that will have been missed in the Scoping Report. 2. In practical terms concurrence of two consultations is in our view unreasonable. This has placed very large burdens on a small Parish Council. We have one paid member of staff who works 3 hours per week, and a population of no more than 100. We probably have fewer people living in the Parish than the whole Olsen team. 3. As Marske and New Forest Parish Council we asked for, and were promised, a consultation session/discussion on issues in our Parish with Olsen in November 2025. The matter then remained under discussion with Olsen for months. The schedule of public information events accompanying the May-June consultation excluded our Parish. Despite raising this after that schedule was published Olsen failed to arrange a session in Marske. We reiterate that more of the Olsen Wind turbines are in our Parish than in anywhere else.
3.2	The EIA process	We feel it would be helpful if Olsen could be asked to produce a Preliminary Environmental Impact Report as this would enable consultees to confirm that the direction set by the Scoping Opinion is being followed in the work leading to the formal planning application. We note that government guidance set out in the Infrastructure and Planning Act, 2025 had not been published when this consultation on the Scoping Report had commenced. The consultation provisions from the 2008 Planning Act should therefore be a guiding principle. In light of the above we ask that the Inspectorate give considerable weight to the desirability of a public consultation on Preliminary Environmental Impact Report (as per Calderdale).

3.4	Rochdale Envelope	See comments above on alternatives (2.9.3 – 2.9.5)
3.6	Temporal Scope	The final bullet point notes that the assumption for the EIA is that the Project will be operational for “approximately 30 years”. We ask that this time period is precisely defined.
3.9, Table 3-1	Assessing Significance	The ES should clearly and consistently set out for each aspect (or chapter) how the significance of effects has been determined, referencing relevant industry guidance and where possible agreement with relevant consultation bodies. The guidelines set out in Table 3-1 are helpful, but the Chapters of the Scoping Report has many deviations from these guidelines which are not explained. We ask that the Inspectorate proposes that all analysis of significance should follow the guidelines set out in Table 3-1, unless a case can be made for deviations from Table 3-1. It is our view that this will improve the understanding of measures of significance across the EIA.
3.11	Cumulative Effects	Marske and New Forest Parish Council is concerned that were the Hope Moor Wind Farm to be given consent that further expansion of that facility might spread along the National Park boundary to the west of the Parish. As noted above the approach to the DCO that excludes the grid connection opens up the possibility that the grid connection DCO may reference additional electricity generation sites served by the proposed grid connection (see comments on 2.5.47 to 2.5.52 above). Olsen operates five wind farm sites in Scotland. At every single site they have either expanded the original site, or are actively seeking consents to do so. We argue that there is a very high likelihood that were Hope Moor to be consented that Olsen would seek to expand that site. We believe this is “reasonably foreseeable” (see 3.11.1). The Planning Inspectorate should ask that Olsen include within the Scoping the impacts of “reasonably foreseeable” expansion of the Hope Moor Windfarm.
3.11.8	Intra-Project Effects	The Scoping Report gives very little detail around the importance and assessment of intra-project effects. It would be helpful if the primary intra-project effects could be tabulated in order that their assessment can be easily judged in the Environmental Statement. Two examples of this are: - the combined effects for users of the visual impacts at the site of the turbine array, and the combined effects that people visiting that area will experience including noise, flicker, and the impacts of a built environment. This will apply to users of roads, footpaths, bridleway and the access land around the array (see paras 5.6.10-5.6.14). - Noise, vibration, traffic disturbance, flicker and other aspects will have effects on people’s physical and mental health (see comments relating to 18.3.35, 18.3.36, Table 18-12, 18.37).

4. Legislation and Policy Context		
Overall		Around 40% of the windfarm area is within our parish. We have not had the time or resource to fully review this chapter. We would expect that other statutory consultees will respond in more detail.
4.5	Land Use Framework for England	We are dismayed that there is no spatial plan covering either North Yorkshire, or England more generally, that defines and prioritises places where it is appropriate to site wind farms. The result of this is that we believe the choice of sites is driven primarily by the ability of promoters to engage willing landowners, and that public interests and therefore given insufficient weight. See also comments under 2.9.3 – 2.9.5 above in relation to consideration of alternatives.

5. Landscape and Visual																		
Overall		We are very concerned about this chapter including because: • It uses out of date guidance. This factor is not discussed. • The guidance used includes no specific measures applicable to the visibility of 200m turbines. Instead catch-all guidance has been used for turbines that are “150m+”. This factor is not discussed. • It uses guidance for Scotland that is not be applicable to England. This factor is not discussed. • Many assertions are made without evidence or justification (e.g. 5.6.8, 5.6.9, 5.6.18). • The use of the proprietary Guidelines for Landscape and Visual Impact Assessment is inappropriate given that this key document is behind a paywall. This factor is not discussed.																
5.2.1, 5.2.2 and throughout the Chapter.	Reliance on outdated Scottish Guidance in asserting limits on Study area for visual and landscape effects.	Throughout this chapter there is a reliance on Scottish Guidance. General comments on the use of Scottish guidance are set out in comments in Chapter 3. Much of the Scottish Guidance used in this Chapter in the Scoping Report is dated. For example, the Scottish Natural Heritage (SNH – now “NatureScot”) documents “Siting and Designing Wind Farms in the Landscape: Guidance” (Ref 5-25), and “Visual Representation of Wind Farms: Guidance” (Ref-5-1) were both published in 2017. These documents tend to focus on wind turbines in the 50-100m height range. The document “Siting and Designing .. 2017” gives recommendations for the study areas for Zone of Theoretical Visibility maps (ZTV) for different turbine heights (see table below extracted from this document). However all turbines above 150m are lumped into a single catch-all category with a recommended study area of 45km. <table><tr><th>Height of turbines including rotors (m)</th><th>Recommended initial ZTV distance from nearest turbine or outer circle of wind farm (km)</th></tr><tr><td>up to 50¹</td><td>15</td></tr><tr><td>51-70</td><td>20</td></tr><tr><td>71-85</td><td>25</td></tr><tr><td>86-100</td><td>30</td></tr><tr><td>101-130</td><td>35</td></tr><tr><td>131-150</td><td>40</td></tr><tr><td>150+</td><td>45</td></tr></table> Table from para 48 in Visual Representation of Wind Farms: Guidance Version 2.2. Scottish Natural Heritage, 2017.	Height of turbines including rotors (m)	Recommended initial ZTV distance from nearest turbine or outer circle of wind farm (km)	up to 50 ¹	15	51-70	20	71-85	25	86-100	30	101-130	35	131-150	40	150+	45
Height of turbines including rotors (m)	Recommended initial ZTV distance from nearest turbine or outer circle of wind farm (km)																	
up to 50 ¹	15																	
51-70	20																	
71-85	25																	
86-100	30																	
101-130	35																	
131-150	40																	
150+	45																	

		This table was drafted in 2017 when few if any onshore turbines were being built at 200m heights. Olsen have asserted a 45km ZTV study area for the EIA work without comment (5.2.1). We question this assertion for the reasons set out below. From the table (above) in the 2017 SNH report one can extrapolate a recommendation for a 200m high turbine is a ZTV study area would be closer to 60km. (A 50m turbine is assigned a 15km ZTV, and a 100m turbine a 30km ZTV.) In lieu of more up to date or relevant guidance we ask that the Planning Inspectorate mandate a 60km study area and that the ZTV maps referred to in 5.2.1 and in Figure 5.1 are re-drafted. Furthermore in 5.2.2 Olsen propose that for the assessment of certain landscape character effects a radius of 20km should be used. This is not justified anywhere. The concept of dividing the Study area into an inner and outer zone is also not explained except by reference a “review of the ZTV for the Project” (5.2.2 first sentence). This approach does not bear any relation to the SNH guidance. We propose that in lieu of any logic behind the creation of a 20km radius area that all landscape character effects should be assessed based on the ZTV radius of 60km as set out above. The Inspectorate’s Opinion should reflect on the need for a full review of the assessment methodology for the visual impact of 200m turbines in an English landscape. In our view Olsen’s approach to ZTV-based assessment in this chapter is based on of out-of-date, and inapplicable guidance, that does not include 200m turbines.
Refs 5-1, 5-22, 5-23, 5-24 and 5-25	Reliance on Scottish Guidance	General comments on the use of Scottish guidance are set out in comments in Chapter 3. There will be several factors which could introduce differences from Scottish guidance in the assessment of the visual impacts of windfarms in the English landscape, including: • The legislative basis for all planning matters differs between England and Scotland • The relative rarity of open land in England when compared to much of Scotland; • The preponderance of flat lying geological strata and large plateaus in England (especially in the Pennines); • Greater density of population in hilly areas in England • The greater recreational use of hilly areas in England • Greater density of populations in large cities often fringing hilly areas (especially in the North); • Greater areas of flat land (e.g. “Vales”) from which hilly areas can be seen • Higher density of enclosures and fields leading to different impacts of turbines in the landscape.

5.3.5	Descriptions of uses of landscape	The sections on the baseline context do not identify that large parts of the Hope Moor area, and other areas around it are “Access Land”. People will be able to view the Wind Farm from areas other than roads and linear rights of way. Much of the Access land is in our Parish.
5.4, 5.4.10, Ref 5-2.	Proposed methodology	The primary reference for the proposed LVIA methodology is “Guidelines for Landscape and Visual Impact Assessment: Third Edition (GLVIA)”. This document is not freely available to Parish Councils or the public and costs over £100. In our view it is not satisfactory that a whole chapter on the assessment of visual impacts is behind a paywall. We can think of no other part of the Scoping Report where the assessment methodology requires access to material behind a paywall. It is unacceptable. We have not been able to review this material – but we note that it is dated from 2013. The Landscape Institute website includes an update in 2024 which is completely unintelligible without the original 2013 document. The Olsen document makes use of both sources (e.g. 5.4.10). We ask the Inspectorate demands that if Olsen wish to carry out the EIA with reference to the GLVIA approach they should supply it for free, and without quibble, to any consultee or member of the public who makes a request for it.
5.4.3	Assessment methodology	As noted in comments on 5.2.1 and 5.2.2. we think that there is no basis for using a 45km limit for the LVIA study area. A 45km study area does not take into account plans to install 200m wind turbines.
5.4.6	Significance of Effects	Para 5.4.6 notes that in relation to landscape and visual effects assessments lead to either a “significant” or “not significant” classification. This differs from the approach set out in Table 3-1 where assessments also include a “potentially significant” category. No explanation is given for this divergence in approach.
5.4.6 and 5.4.7	Sensitivity and Magnitude of Effects	The significance of visual impacts is a result of the assessments made of the Sensitivity and Magnitude of effects. Section 5.4.6 only describes part of the methodology for assessing the significance of landscape and visual receptors. The Scoping Report should include definitions of how sensitivity and magnitude will be assessed – currently the document is silent on that. Without a description of how this will be done it is not clear on what basis subsequent statements about significance (in 5.4.6 and 5.4.7) can be made. We ask that the Planning Inspectorate in its Scoping Opinion asks for clear definitions of magnitude and sensitivity scoring methods for landscape and visual receptors.
5.6	ZTV - overview	The Study area for the ZTV works should be 60km as set out in comments on 5.2.1 and 5.2.2. As noted above no justification based on any source external to Olsen has been provided for using a smaller area (20km) for <i>any</i> assessments in the EIA.

5.6.8-5.6.9	Landscape Character	The statement at the end of this paragraph 5.6.8 that “It is also considered that beyond 20 km, the visibility reduces as the apparent height of the turbines will form a smaller feature on distant horizons and will only be viewed in very good to excellent visibility conditions” is both subjective and without any justification. This unjustified statement in 5.6.8 is then used in para 5.6.9 to justify a statement that “potential for significant landscape character effects may only arise within an area of approximately 20km radius from the proposed wind turbines. As such it is proposed that the landscape character assessment will focus on this 20km area.” These statements are also entirely without any justification. As noted in comments under 5.2.1, 5.2.2 the methodology for LVIA has been based on out-of-date Scottish guidance that is not relevant to 200m turbines. Y
5.6.10-5.6.14	Landscape character – local impacts	The Landscape character of the local area <i>in and around</i> the windfarm array will be hugely affected by the Project. We ask that the Inspectorate asks Olsens to develop a methodology that assesses the wind farm array not just in terms of its visual impact from points away from the site but also from at/near the site itself. Around 40% of the windfarm area is within our parish. This assessment should not be limited to the visual impact but also to the combined effects that people visiting the area will experience including noise, flicker, and the impacts of a built environment on the users of roads, footpaths, bridleway and the access land in the area.
Table 5.2	Preliminary Assessment of Landscape Designations	As noted in comments under 5.2.1, 5.2.2 the methodology for LVIA has been based on out-of-date Scottish guidance that was drafted before the prevalence of 200m turbines in developers plans for windfarms. The Study area should be based on a 60km radius as noted in comments relating to 5.2.1. Applying this logic invalidates many of the exclusions proposed in this table. It will bring into scope designated landscapes including: • The Lake District National Park • North York Moors National Park • Parts of Nidderdale NL • Durham City Centre/Castle/Cathedral • Hackfall • Newby Hall • Swinton Castle area
5.6.18	Yorkshire Dales National Park	The Parish of Marske and New Forest is bisected by the Yorkshire Dales National Park boundary (YDNP). The YDNP Management plan has a 4-page summary of the Park’s “Special Qualities”. The list of Qualities provided by Olsen in 5.6.18 are selective and without justification. We are astonished that this selective list excludes the YDNP Special Quality which states “Fells that rise to over 700 metres at High Seat, Great Shunner Fell, Wild Boar Fell and the millstone grit-capped ‘Three Peaks’, and include the highest peaks in Yorkshire (Whernside) and Lancashire (Gragareth). Glaciers and rivers have cut deep dales into the extensive moorland plateaux, each distinctive in character and atmosphere”. We would like to Inspectorate to develop an Opinion that addresses this selectivity.

5.6.20	Special [landscape] Qualities.	The proposed approach here is to follow Scottish Guidance. For reasons already set out under comments relating to Chapter 3 this is unsatisfactory. See also specific comments above relating to Chapter 5.
5.6.21	Visual Receptors and Visual Amenity	As noted in comments under 5.3.5 there is no recognition that most of the Hope Moor area, and other areas around it are “Access Land”. The wind turbines will be within this access land. It is very poor that this has not been recognised by the Scottish-based Olsen team. It goes to show that Olsen is blind to the differences between the Scottish and English planning environments.
5.6.22	Viewpoint Selection	As noted in comments under 5.2.1, 5.2.2 the methodology for LVIA has been based on out-of-date Scottish guidance that was drafted before the prevalence of 200m turbines in developers plans for windfarms. Viewpoints should be based on a 60km radius as noted in comments relating to 5.2.1. There is no justification for limiting the viewpoint list to areas within 20km of the turbines. Olsen should justify the location and number of viewpoints, ensuring these capture a worst-case scenario of impacts from the proposed development and are representative of visual receptors. Efforts should be made to agree the number and location of viewpoints and for photomontages with Marske and New Forest Parish Council. The Parish Council does not consider the viewpoints set out in Table 5-3 enable a sufficient and robust assessment of impact. The project scoping should augment the suggested receptor list set out in Table 5-3 with sequential views from all footpaths and bridleways within 5km of the proposed development area. Additionally users of open access land should be considered key visual receptors and should be included. Given the potential for access road formation/widening, cut-and-fill, borrow pits, vegetation removal and lighting to give rise to notable landscape and visual effects, the ES should include route-based viewpoints along the access corridors (including key bends, gradients and settlement interfaces) and present sequential assessment where appropriate, in addition to turbine-focused viewpoints. Marske and New Forest Parish would like the following visual receptors to be added to the viewpoint list, and request further consultation in due course with Olsen in line with the comments above: • Hardstiles Top (068001) • Jingle Pot Farm (100011) • Park Top Farm (122019) • Point 368 (on access land) (076004) • Skelton Moor (077020)

		• Dicky Edge (087322) • Moor House Farm (088010) • East end of Downholme Bridge (013991) • How Gate (071052) • Cordilleras Farm north of woodland (094040) • Kexwith Farm (053050) • Frankinshawe Howe (061064) • Holgate Howe (067047) Finally the assessment of viewpoint visualisations should include (a) the foreground in front of turbines, (b) the appearance of turbines on the horizon, and (c) the view beyond (or through), the turbine array. All these factors will affect the perceptions of the impact of the wind farm on the character of the local landscape.
Aviation lighting	5.6.24	This section again references Scottish guidance (see general comments in relation to Chapter 3, and 5.2.1 and 5.2.2). No commentary has been provided as to why Scottish guidance is appropriate for an English landscape, and what its limitations might be. The Olsen Scoping Study recommends a 20km Study area – but as is prevalent throughout the whole of this chapter this is not justified. Given that this Scottish guidance is primarily based on smaller turbines (see comments under 5.21.and 5.2.2) it is suggested that a 30km study area is used to assess aviation lighting.
5.6.30	Potential Effects Summary	For the reasons set out in relation to most of the work in this Chapter (see above) we assert that the conclusions listed in section 5.6.30 are highly misleading.
Section 5.7/5.8	Potential Impacts Scoped in and out.	For the reasons set out in relation to most of the work in this Chapter (see above) we assert that the conclusions listed in sections 5.7 and 5.8 are highly misleading.
Questions	LVIA Study Area	We answer “No” to almost all the questions for reasons set out above.

6. Archaeology and Cultural Heritage		
6.	General	Around 40% of the windfarm area is within our parish. We have not had the time or resource to fully review this chapter. We would expect that other statutory consultees will respond in more detail.
6.2.2, 6.4.10	Study Area	The study area of 10km is justified in terms of Olsen's experience and professional judgement and refers also to the Chapter 5 on landscape and visual impacts. We have highlighted significant concerns on the assessment of visual impacts of the windfarm already (see comments on Chapter 5). We expect that Olsen will provide a justification for the Study Area in Chapter 6 that takes more heed of relevant published as well as informal guidance from statutory bodies. As noted elsewhere (see comments relating to Chapter 3) guidance cited in this Chapter has been developed for a Scottish context. There is no explanation in paras 6.2.2 or 6.4.10 for why Scottish guidance has been followed, and whether there are limitations in following such guidance in an English planning context.
6.4.4	Scope of Assessment	As a parish council we are not experts in the subject matter in this chapter. We are surprised by the footnote (2) in this paragraph. If it is true that "there is currently no universally agreed methodology for assessing the impact of development of heritage assets within an Environmental Statement" then we ask that Olsen to make the case to Historic England for such guidance to be drawn up before the formal DCO application. Can the Inspectorate highlight this lacuna in their Opinion.
Table 6-2, and Table 6.3 and related text.	Cultural Heritage Significance	The grids set out in Tables 6-2 and 6-3 differs from the template set out in Table 3-1. There is no reason given for the use of a different set of categories and descriptors for sensitivity and magnitude in these Tables when compared to Table 3-1. Having a common grid across all aspects covered in the EIA increases its legibility. See our comments on 3.9 and Table 3-1.
7. Ecology		
7.	General	We have not had the time or resource to fully review this chapter. We would expect that other statutory consultees will respond in more detail. We note that around 40% of the windfarm area is within our parish, and about 90% of the drainage from the windfarm array is in the catchment of Marske Beck.
7.3 and Table 7-1	Baseline Environment	The Habitat/National Vegetation Classification (NVC) area is limited to the "entire site". The Council requests that baseline assessment of effects on vegetation are also carried in a buffer zone around the proposed

		windfarm. This would allow changes in vegetation to be compared through time to neighbouring areas with similar vegetation, but which are not affected by the windfarm construction and operation.
Table 7-1, Table 7-5.	Bat and Badger surveys	As noted elsewhere in this response some guidance cited in this Chapter has been developed for a Scottish context. Our general comments on this are set out in relation to Chapter 3. There is no explanation in Table 7-1 (or Table 7.5) as to why surveys of common English fauna, including Bats and Badgers, are assessed against Scottish guidance, or whether there are limitations in following such guidance in an English planning and ecological context. We note that there are over half a million badgers in England. Both bats and badgers have been the subject of significant public interest in England for many years, including in reference to planning issues, and are surprised that the assessment of them in Yorkshire requires resort to Scottish guidance.
Table 7-7	Areas scoped out	As noted above (see comments on Tables 7-1 and 7-5) the proposals made here to scope out bat collision risks are based on Scottish guidance. No explanation is as to why Scottish guidance is being followed, and whether there are limitations in following such guidance in an English planning and ecological context. Without such justification we disagree with the proposals to scope out this effect.
8. Ornithology		
8.	General	We have not had the time or resource to fully review this chapter. We would expect that other statutory consultees will respond in more detail. We note that around 40% of the windfarm area is within our parish, and about 90% of the drainage from the windfarm array is in the catchment of Marske Beck. We also note that there are more turbines planned within Marske and New Forest than in any other parish (9 out of the proposed 23 turbines).
8.3.16-17, 8.3.25-27, 8.3.40, 8.4.1-2 8.4.5, 8.4.11, 8.4.27-28, Table 8-9	Use of Scottish ornithological guidance in an English Environmental Assessment.	Guidance cited in this Chapter has been developed for a Scottish context. Our general comments in relation to the use of Scottish guidance is contained within our comments on Chapter 3. There is no explanation as to why ornithological surveys of English birds are assessed against Scottish guidance, or where there are limitations in following such guidance in an English planning and ornithological context. Furthermore as surveys have already been carried out using Scottish guidance they need to be reviewed considering any limitations that this guidance presents when used in an English context.
Table 8-5. Impact magnitude.		The grids set out in Table 8-5 and Table 8-6 differ from the template set out in Table 3-1. There is no reason given for the use of a different set of categories and descriptors for sensitivity and magnitude in these Tables when

		compared to Table 3-1. Having a common grid across all aspects covered in the EIA increases its legibility. See general comments in relation to 3.9 and Table 3-1.
9. Hydrology and Hydrogeology		
9.2	Study Area	The study area should be wide enough to ensure that it encompasses all water features that have the potential to be significantly impacted by the proposed development. Sufficient cross-referencing within the ES should ensure all hydrological links, ecological and human receptors are considered in determining this. The Parish Council considers that the study area is inadequate for a project of this scale. Almost all the catchment of Marske Beck is within our parish. The 500m buffer (Fig 9.1) is drawn in a manner that ignores water features that will be impacted by this development. specifically in the case of Mosedale Gill. We would also like to see an assessment of the land adjacent to Marske Beck, and its tributaries towards its confluence with the River Swale (perhaps to the point of the sewage treatment plant at Marske Bridge). We would like the Inspectorate to reflect this in their Opinion.
9.2.3	Distance impacts along water courses	The distance impacts along watercourses flowing away from the Wind Farm site should extend to a natural hydrological boundary and not to an arbitrary 2km distance as proposed. We propose that the logical boundary for this assessment is the confluence of Marske Beck with the River Swale. The streams whose catchments are in the area of the proposed windfarm (Mosedale Gill, Arndale Beck, Kexwith Beck and Rake Beck) all flow into Marske Beck and make up a significant proportion of Marske Beck's flow volume.
9.3.26, 9.3.30-35	Water abstractions	All private water supplies in the Parish of Marske and New Forest should be identified, including ground water, stream water (including hydraulic rams) and wells. This should include water used for domestic, agricultural and business purposes. The list of sensitive receptors (9.3.30-9.3.35) should include all private water sources within the Marske Beck catchment as far as its confluence with the Swale. The Inspectorate in its Scoping Opinion should reflect on the lack of a clearly defined assessment methodology for the impacts of the Project on private water supplies.
9.3.31/9.4.16	Sensitive receptors	The watercourses included as sensitive receptor should include the whole of the course of Marske Beck to its confluence with the Swale as set out above (see 9.2.3). This area extends beyond that shown in Figure 9.1.
9.4.5	Assessment methodology	The absence of English guidance in relation to hydrological assessments of wind farm developments is disappointing and does not protect our local interests. General points about the applicability of Scottish guidance are covered under our comments on Chapter 3.

9.4.8/Q 9.2	Significance of Receptor	The applicant should demonstrate the derivation of their definitions of Receptor Sensitivity (Table 9-3) and set out how they have established these definitions by reference to existing guidance and/or the agreement of statutory bodies. Similarly the source for the ecological and chemical status of water bodies (Table 9-2) should be identified – as this is a key component in the assessment of significance. Given that this data was published in 2019 (and may have been sampled before then) we ask that a comprehensive set of up-to-date water quality measurements is made in the Marske Beck catchment. We do not agree with the premise of Q9.2 that no new water quality sampling should be undertaken – given the substantial focus in the past decade on improved practices to improve water quality, for example relating to agricultural practices.
9.5.2	Design Mitigation and Enhancement: Surface Water	The construction phase surface water scheme will need to cover each phase of the proposal (including decommissioning) for the duration of construction with escalation and backup measures during storm events along with contact details for normal working hours, out of hours, weekends and holidays. The Construction Phase Surface Water Management plan shall include the following as a minimum: • Measures to prevent uncontrolled runoff affecting adjacent third-party land • Measures to maintain/improve water quality • Measures to prevent siltation • A design drawing showing the on-site location of the proposed measures • An emergency escalation procedure in case of a rainstorm • Design calculations to show that the scheme can retain the runoff volume for the critical 1in 100-year storm
Table 9.5	Erosion and sedimentation - operation	The Scoping Report seeks to address this issue in the proposed CEMP. Little information has been provided to demonstrate why this assessment, and the proposed mitigations, should not be undertaken as an integral part of the development of the ES. We would like the Inspectorate to reflect this point.
Table 9-5.	Hydrological impacts of road construction	Table 9-5 excludes any consideration of the impacts of road construction within the wind turbine site of water flows. These effects should be scoped into the work on the EIA.
10. Geology, Soils and Ground Conditions		
10.	General	Around 40% of the windfarm area is within our parish. We have not had the time or resource to fully review this chapter. We would expect that other statutory consultees will respond in more detail.

10.4.8	Reliance on NatureScot guidance	Guidance cited in this Chapter has been developed for a Scottish context. Our general comments in relation to the use of Scottish guidance is contained within our comments on Chapter 3. There is no explanation in para 10.4.8 on why this guidance has been followed, and whether there are limitations in following such a course of action in an English planning context.
10.5 and Table 10.3	Areas scoped in	These sections do not appear to refer to any assessment of the impacts of the very substantial volumes of construction waste set out in Table 18-5 (in the order of 300,000 m ³).
11. Access, Traffic and Transport		
11.3.14, 11.4.8, 11.4.23, 11.4.48, Table 11-6	Access Land	The Scoping Report makes no mention of Access land (CROW Act 2000). Almost all the area occupied by the proposed wind turbine array is Access Land. The chapter should reflect this, and included appropriate assessments relating to rights of access over this land. Much of this land is within the parish of Marske and New Forest. The Inspectorate should opine on the incorporation of legislation that applies primarily to England to this Project, in this case in respect of rights of access.
11.3.15	Non-Motorised users	No mention is made of cyclists or horse riders using the roads in and around the Scoping area. It should also be noted that Smallways on the A66 is one of the few places that cyclists can cross the A66 safely. It is important that these issues are considered in the assessments in Chapter 11.
11.4.5	Construction impacts: traffic	We note that this paragraph suggests that “professional judgment” should be applied to estimates of routes taken by vehicles travelling to and from the Project. This suggests that Olsen does not intend to take an active role in the management of all vehicles traveling to/from the Project. As a parish we note that the use by Cordilleras Lane from Marske towards the site is inappropriate for all vehicles including cars and vans. It is a single-track road, up a steep bank (15-20%), on a steep hillside, and has no formal passing places. It is used regularly by local farmers in their daily work, often in tractors and hauling heavy loads. We ask that Olsen creates a plan for all vehicles that <i>does not</i> include Cordilleras Lane – and that the routes taken by vehicles are assessed on the basis of this plan.
11.4.9	Operational impacts: traffic	For the reasons noted above (comments on 11.4.5) we do not feel it is appropriate that wind farm connected traffic uses Cordilleras Lane from Marske to the site, including cars and vans. If this is not accepted by Olsen then we disagree with the scoping out of operational traffic from the assessment.

11.4.23 11.4.32	Non-motorised users and receptors	This section contains no mention of cycling, horse-riding, or Access land (see also comments above). Much of the Access land in the turbine area is in our Parish.
11.4.33 and Table 11-4	Significant criteria	The grid set out in Table 11-4 differs from the template set out in Table 3-1 (see comments on para 3.9) . There is no reason given for the use of a different set of categories and descriptors for sensitivity and magnitude in Table 11-4 when compared to Table 3-1.
Table 11.6	Potential Impacts Scoped in	As noted above there is no consideration of Access Land. The assessment of the impact of this windfarm on the rights of the public to make use, without hindrance, of access land should be considered fully.
Table 11.7	Potential Impacts Scoped Out	As noted above we do not agree that that additional vehicle movements during operation and maintenance should be scoped out. Were Olsen to create a plan for all vehicles that <i>does not</i> include Cordilleras Lane then we would accept the scoping out of vehicle movements.
12. Noise and Vibration		
12.	General	Around 40% of the windfarm area is within our parish. We have not had the time or resource to fully review this chapter. We would expect that other statutory consultees will respond in more detail.
13. Aviation, Radar and Telecoms		
13.	General	Around 40% of the windfarm area is within our parish. We have not had the time or resource to fully review this chapter. We would expect that other statutory consultees will respond in more detail.
14. Shadow Flicker		
14.	General	Around 40% of the windfarm area is within our parish. We have not had the time or resource to fully review this chapter. We would expect that other statutory consultees ill respond in more detail.
15. Air Quality		
15.	General	Around 40% of the windfarm area is within our parish. We have not had the time or resource to fully review this chapter. We would expect that other statutory consultees will respond in more detail.

16. Carbon and Climate Change		
16.1.12	Introduction	We would expect that the baseline for the measurement of GHG emissions should be a baseline that <i>includes</i> the projected impact of the Government's "Clean Power 2030 Action Plan: A new era of clean electricity", published in December 2024. The impact of the GHG emissions of this project should be measured against this baseline, and be consistent with the exclusion of "do-nothing and "no-development" scenarios from the proposed work in the section above headed "Consideration of Alternatives" (2.9.6).
Table 16-1	Sources of information	We are puzzled by the omission of any reference to the North Yorkshire local authority area in this table.
16.3.3	GHG Assessment	The statement that "based on the current peatland condition, it is considered to be an overall net emitter of carbon due to its poor condition and heavily eroded state." Is not justified. We ask that the Planning Inspectorate either asks Olsen for a justification of this statement, or asks that the statement is removed from any assessments.
Table 16-2	Impacts scoped into the GHG assessment	The transport impacts set out in the Construction and Operation phases only consider the movement of inbound vehicles. This assessment should also consider the movement of outbound vehicles – as all inbound movements will be accompanied by a balancing outbound movement. The reverse applies to the decommissioning phase.
17. Socio-Economics		
17.2.1, 17.5.4, 17.5.5, Table 17.4	Definition of "Local Area"	We do not agree that the Local Area for this chapter should be based on political boundaries (Council wards). For example this definition extends up to 40km from the windfarm to the border with Cumbria, but misses out the nearby towns of Richmond, Catterick Garrison and Barnard Castle. These towns are integral to the economic interests of those living within our parish. The impact of this unhelpful definition of the Local Area has been to downplay the importance of agriculture and farming to the local economy. 63% of the population of the combined parishes of Marske and New Forest and Marrick are economically active (2021 census). "Agriculture, Forestry and Fishing" provides 29% of the employment (compared to 1% in England as a whole). Perhaps because of the poor definition of the Local Area the Chapter on socio-economic assessment omits to cover anything on farming (but says a lot about tourism).

		A better definition of Local Area should be reflected throughout this chapter – until this is done Table 17.4 is misleading. The chapter should also include an assessment of farming and agriculture. We ask that the Planning Inspectorate requires that the Local Area better reflects the stated aim that it should be “defined to reflect the geographical scales at which socio-economic effects may occur.”
Overall	Assessment of farming	The Inspectorate is asked to include in the Scoping Opinion a view that the ES should include an in-depth assessment of the impacts of the Project on farming and related agricultural activities. This should include but, not be limited to, the impact of the Project as regards: • Local farming practices and economics • Cultural issues associated with family farming • Maintenance of historic farm-related built environment • Any impact from the scheme that might lead to displacement of farming activities • The impact of the Project on the long-term fortunes of small local farms • Small businesses related to local farms and small-holdings • Grouse shooting and pheasant rearing • Impact on Common land and commoners • Transport issues related to farm work • Impacts of the scheme on recent (past 5-years) and current schemes to improve the quality of the environment through farming actions
17.3.15, 17.5.4	Drivers of Tourism	The assessment on drivers of tourism is based analysis of documents from North Yorkshire (“Destination Management Plan” (DMP)) and County Durham Councils, both of whom are of course public bodies. In our view the North Yorkshire DMP has significant short-comings. Whilst the document mentions the National Park (very much in the small print) it is focussed almost entirely on the area of North Yorkshire outside of the Yorkshire Dales National Park (for example the DMP only contains one photograph (out of around 30) that is identified as being within the National Park. The Yorkshire Dales (including the National Park and surrounding areas) is one of the most visited areas in England. One of the main drivers of tourism here is the landscape and countryside. It is also the landscape and countryside, including in and around our parish, that will be impacted by the proposed windfarm. There is no sense from reading the text in Chapter 17 that these effects have been understood. The appearance of wind turbines on the boundary of the National Park, and visible from both nearby parts of the Park (e.g.

		Arkengarthdale) and prominent areas such as the Three Peaks, will have an impact on the attractiveness of the Park to visitors. The livelihoods of many of those living and working within the park who depend on it, including some of those in our parish. These impacts should be assessed as part of the EIA process. We would hope that the Planning Inspectorate would require that Olsen develop a more broadly based assessment of the local tourist economy, including assessments within it that relate to the importance of the landscape and countryside to visitors.
17.4.6	Relevant Policy	This section omits any documents produced by the Yorkshire Dales National Park Authority. Our Parish is partly within the National Park. We ask that the Parks work is included in the items listed in 17.4.6.
18. Other Environmental Topics		
18.	General	Around 40% of the windfarm area is within our parish. We have not had the time or resource to fully review this chapter. We would expect that other statutory consultees will respond in more detail.
Table 18-5	Impacts of Waste	The very substantial volumes of waste quoted here are not reflected in the assessment of soil/geology in Chapter 10 (see 10.5 and Table 10.3).
18.3.28	Community Facilities	The name of the pub in Barningham is spelt incorrectly. It is the Milbank Arms. Some people in Marske have been more reluctant to eat there since the plans for the Windfarm were hatched.
18.3.28	Community Facilities	The other local community facility in Marske and New Forest is the Helwith Tea Garden.
18.3.35, 18.3.36, Table 18-12, 18.37	Rational for scoping out health impacts	We do not accept the statement in para 18.3.35 that the mitigations outlined lead to “it being considered” that human health issues should be scoped out. A more careful assessment should be carried out. We know from our experience in the parish that the impacts of the plans have already caused significant mental stress for some of our residents. Noise, vibration, traffic disturbance, flicker and other aspects will have effects on parts of our Parish during both construction and operation. We ask that the Inspectorate’s Opinion includes assessment of the combined nature that these effects will have on people’s physical and mental health.
19. Summary		
19.	General	Our comments on this section are set out in relation to the Chapters above.

From: [REDACTED]@middlesbrough.gov.uk>

Sent: 10 June 2026 07:59

To: Hope Moor Wind Farm <HopeMoorWindFarm@planninginspectorate.gov.uk>

Subject: RE: EN0110038 - Hope Moor Onshore Windfarm - EIA Scoping and Consultation and Regulation 11 notification

This document was classified as: OFFICIAL

Good morning Emily

Thank you for your email of 29th May consulting on the proposed wind farm at Hope Moor.

Having considered the information, Middlesbrough Council has no comments to make.

Regards

[REDACTED]
Principal Planning Officer

Development Control
Middlesbrough Council
PO Box 500, Middlesbrough, TS1 9FT

[REDACTED]@middlesbrough.gov.uk | [REDACTED] | W:
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Defence Infrastructure Organisation

Ministry of Defence
Safeguarding Department
DIO Head Office
St George's House
DMS Whittington
Lichfield
Staffordshire WS14 9PY

Your reference: EN0110038

E-mail: DIO-Safeguarding-Wind@mod.gov.uk

Our reference: DIO10071024

www.mod.uk/DIO

Emily Park
Environmental Services
Infrastructure Decisions and Applications Service
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

26 June 2026

By email only

Dear Emily,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11.

Proposed application by Fred. Olsen Renewables Ltd (the applicant) for an Order granting Development Consent for the Hope Moor Wind Farm (the proposed development).

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested.

Thank you for consulting the Ministry of Defence (MOD) in relation to the scoping consultation for the proposed Hope Moor Wind Farm.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

I am writing to advise you that the MOD has concerns with the proposal.

It is anticipated that the proposed development will consist of onsite substation(s), anemometry mast(s) and other infrastructure, along with the erection of up to 23 wind turbines. The turbines will each have a maximum blade tip height of 200 metres (m) above ground level (agl). The development

has been assessed using the location data (Grid References) provided in the developer's document 'Environmental Impact Assessment Scoping Report: Main Text', dated May 2026.

Turbine no.	Easting	Northing
T1	404938	505823
T2	404245	505539
T3	404299	505998
T4	403625	505964
T5	403206	506118
T6	402599	506732
T7	402835	507293
T8	403471	507548
T9	403432	507091
T10	403782	506792
T11	404333	507774
T12	404710	507491
T13	404543	506977
T14	404798	506672
T15	405120	506382
T16	405309	507217
T17	405589	506892
T18	406119	507412
T19	406292	506987
T20	405916	506417
T21	406429	506202
T22	406481	505704
T23	405876	505694

The principal safeguarding concerns of the MOD with respect to wind farm proposal relate to the potential for the development to:

- be detectable by, and impact upon, the operation and capability of one or more MOD radars as specified below; and
- introduce a physical obstruction to air traffic movements.

Air Traffic Control (ATC) Radar

The turbines will be 30km from, detectable by, and will cause unacceptable interference to the ATC radar sited at RAF Leeming.

Wind turbines have been shown to have detrimental effects on the performance of Primary Surveillance Radars. These effects include the desensitisation of radar in the vicinity of the turbines, shadowing and the creation of "unwanted" aircraft returns which air traffic controllers must treat as aircraft returns. The desensitisation of radar could result in aircraft not being detected by the radar and therefore not presented to air traffic controllers. Controllers use the radar to separate and sequence both military and civilian aircraft, and in busy uncontrolled airspace radar is the only sure way to do this safely. Maintaining situational awareness of all aircraft movements within the airspace is crucial to achieving a safe and efficient air traffic service, and the integrity of radar data is central to this process. The creation of "unwanted" returns displayed on the radar leads to increased workload for both controllers and aircrews. Furthermore, real aircraft returns can be obscured by a turbine's radar return, making the tracking of both conflicting unknown aircraft and the controllers' own traffic much more difficult.

Air Defence (AD) radar

The turbines will be 108.5 km from, detectable by, and will cause unacceptable interference to the AD radar at RRH Brizlee Wood.

Wind turbines have been shown to have detrimental effects on the operation of radar. These include the desensitisation of radar in the vicinity of the turbines, and the creation of "false" aircraft returns. The probability of the radar detecting aircraft flying over or in the vicinity of the turbines would be reduced, hence turbine proliferation within a specific locality can result in unacceptable degradation of the radar's operational integrity. This would reduce the RAF's ability to detect and deter aircraft in United Kingdom sovereign airspace, thereby preventing it from effectively performing its primary function of Air Defence of the United Kingdom.

Physical Obstruction

In this case the development falls within Low Flying Area 17 (LFA 17), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The addition of turbines in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area.

If the developer is able to overcome the issues stated above, to address the impact up on low flying given the location and scale of the development, the MOD would require that conditions are added to any consent issued requiring that the development is fitted with aviation safety lighting and that sufficient data is submitted to ensure that structures can be accurately charted to allow deconfliction.

Grid Connection

Within the scoping report, the applicant has taken the view that the Project-specific connection infrastructure does form part of the Project for EIA purposes. It is acknowledged that, at this stage, there is insufficient detail available regarding the electrical infrastructure of overhead or underground electricity cables required to connect the on-site substation to an off-site substation, including the location of the off-site substation. The MOD request that we are consulted on any detailed applications submitted so that a full assessment can be completed and any impacts identified can be addressed appropriately.

Summary

The principal safeguarding concerns of the MOD with respect to this wind farm proposal relate to the potential for the development to:

- be detectable to, and impact on the operation and capability of, one or more MOD radars as specified; and
- introduce a physical obstruction to air traffic movements.

The MOD must emphasise that the advice provided within this letter is in response to the information detailed in the developer's documents 'Environmental Impact Assessment Scoping Report: Main Text', dated May 2026, 'Environmental Impact Assessment Scoping Report Volume A: Figures', dated May 2026 and 'Environmental Impact Assessment Scoping Report Volume B: Appendices – Appendix 2A Applicant's Position on Grid Connection Infrastructure', dated May 2026. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I hope this adequately explains our position on the matter. If you require further information or would like to discuss this matter further, please do not hesitate to contact me.

Further information about the effects of wind turbines on MOD interests can be obtained from the following websites:

MOD: <https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding>



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Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)
National Grid Electricity Transmission (NGET)
www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
HopeMoorWindFarm@planninginspectorate.gov.uk

26 June 2026

Dear Sir/Madam

RE: APPLICATION BY FRED. OLSEN RENEWABLES LTD (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE HOPE MOORE WIND FARM (THE PROPOSED DEVELOPMENT)

SCOPING CONSULTATION RESPONSE

We refer to your letter dated 29th May 2026 regarding the above Proposed Development.

This is a response on behalf of National Grid Electricity Transmission PLC (NGET).

NGET has no existing apparatus within or in close proximity to the proposed site boundary but would like to be kept informed as the proposal progresses.

We enclose a plan showing our nearest infrastructure.

If you require any further information, please do not hesitate to contact the Land Development Liaison team.

Yours faithfully,

[REDACTED]

Lead Development Liaison Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

[REDACTED]

Development Liaison Support Officer
Customer Connections Site Solutions (CCSS)
Land, Planning and External Affairs (LPEA)

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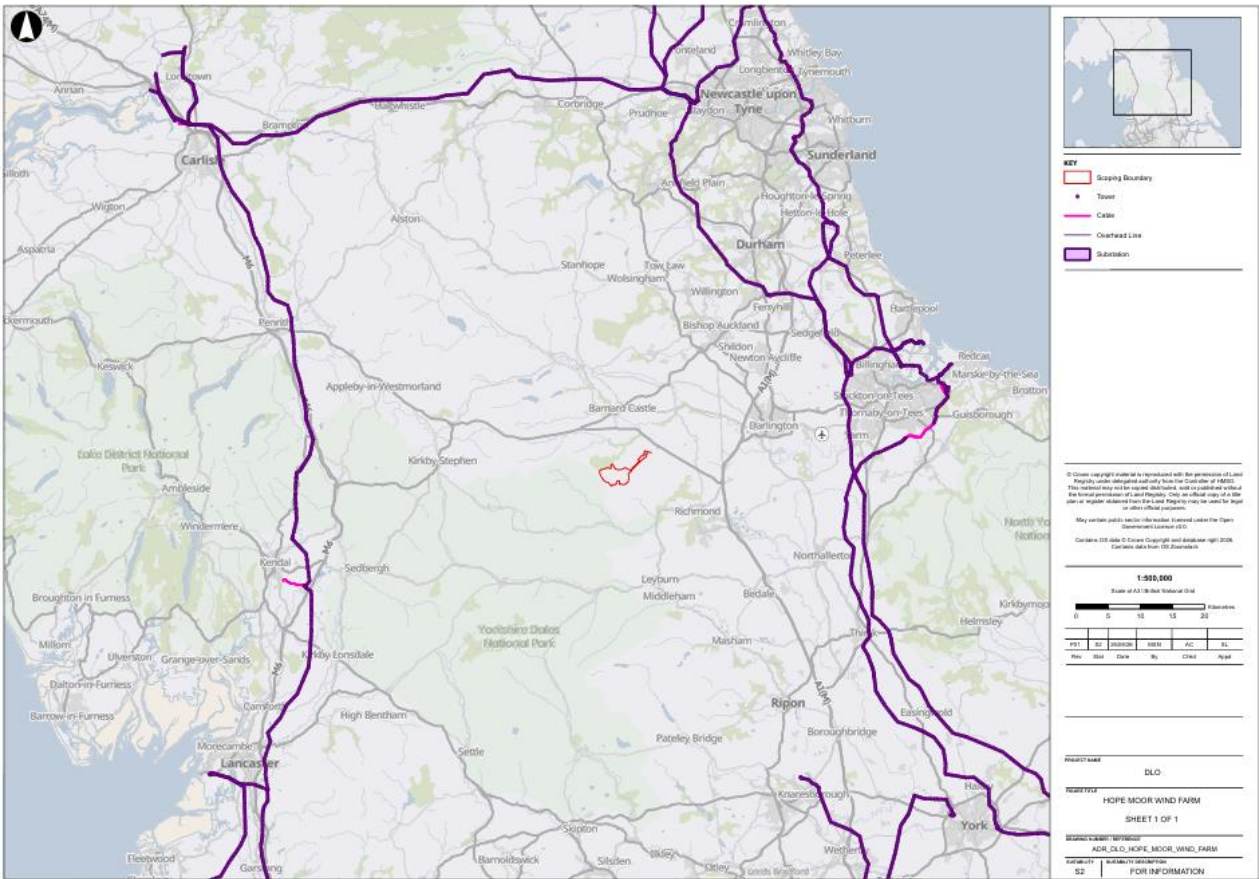


Figure 1: NGET Assets Near to Scoping Boundary

Technical Guidance Note 287

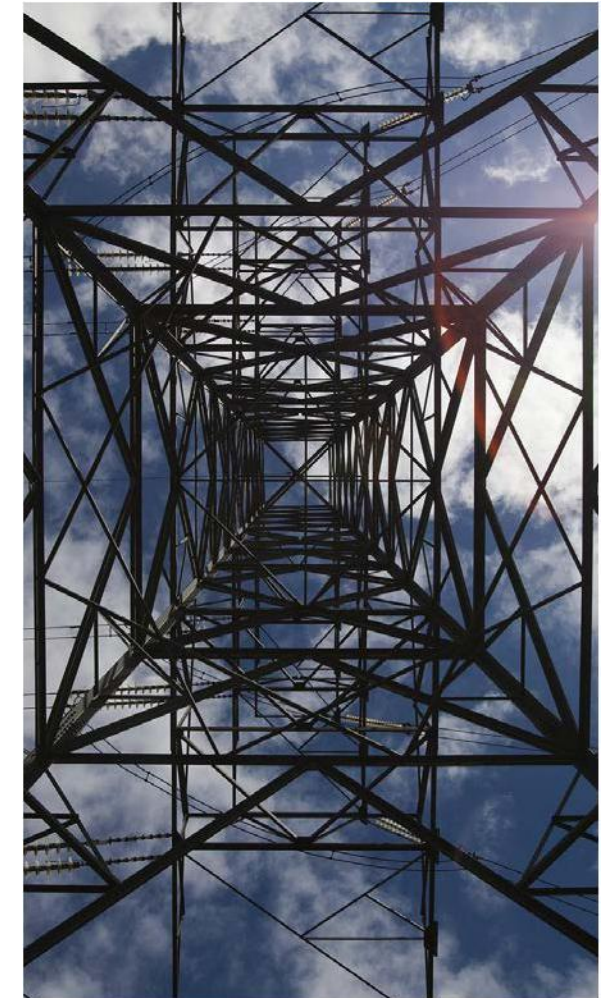
Third-party guidance for working near National Grid Electricity Transmission equipment

nationalgrid





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Disclaimer

National Grid Gas Transmission and National Grid Electricity Transmission or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law, nor does it supersede the express terms of any related agreements.



Purpose and scope

The purpose of this document is to give guidance and information to third parties who are proposing, scheduling or designing developments close to National Grid Electricity Transmission assets.

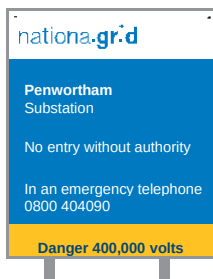
The scope of the report covers information on basic safety and the location of our assets – and also highlights key issues around particular types of development and risk areas.

In the case of electrical assets, National Grid does not authorise or agree safe systems of work with developers and contractors. However, we will advise on issues such as electrical safety clearances and the location of towers and cables. We also work with developers to minimise the impact of any National Grid assets that are nearby.

How to identify specific National Grid sites

Substations

The name of the Substation and emergency contact number will be on the site sign.



Overhead Lines

The reference number of the tower and the emergency contact number will be on this type of sign.



Contact National Grid

Plant protection

For routine enquiries regarding planned or scheduled works, contact the Asset Protection team online, by email or phone.

www.lsbud.co.uk

Email: assetprotection@nationalgrid.com

Phone: 0800 001 4282

Emergencies

In the event of occurrences such as a cable strike, coming into contact with an overhead line conductor or identifying any hazards or problems with National Grid's equipment, phone our emergency number 0800 404 090 (option 1).

If you have apparatus within 30m of a National Grid asset, please ensure that the emergency number is included in your site's emergency procedures.

Consider safety

Consider the hazards identified in this document when working near electrical equipment



Part 1

Electricity transmission infrastructure

National Grid owns and maintains the high-voltage electricity transmission network in England and Wales (Scotland has its own networks). It's responsible for balancing supply with demand on a minute-by-minute basis across the network.

Overhead lines

Overhead lines consist of two main parts – pylons (also called towers) and conductors (or wires). Pylons are typically steel lattice structures mounted on concrete foundations. A pylon's design can vary due to factors such as voltage, conductor type and the strength of structure required.

Conductors, which are the 'live' part of the overhead line, hang from pylons on insulators. Conductors come in several different designs depending on the amount of power that is transmitted on the circuit.

In addition to the two main components, some Overhead Line Routes carry a Fibre Optic cable between the towers with an final underground connection to the Substations.

In most cases, National Grid's overhead lines operate at 275kV or 400kV.

Underground cables

Underground cables are a growing feature of National Grid's network. They consist of a conducting core surrounded by layers of insulation and armour. Cables can be laid in the road, across open land or in tunnels. They operate at a range of voltages, up to 400kV.

Substations

Substations are found at points on the network where circuits come together or where a rise or fall in voltage is required. Transmission substations tend to be large facilities containing equipment such as power transformers, circuit breakers, reactors and capacitors. In addition Diesel generators and compressed air systems can be located there.

Part 2

Statutory requirements for working near high-voltage electricity

The legal framework that regulates electrical safety in the UK is *The Electricity Safety, Quality and Continuity Regulations (ESQCR) 2002*. This also details the minimum electrical safety clearances, which are used as a basis for the Energy Networks Association (ENA) TS 43-8. These standards have been agreed by CENELEC (European Committee for Electrotechnical Standardisation) and also form part of the *British Standard BS EN 50341-1:2012 Overhead Electrical Lines exceeding AC 1kV*. All electricity companies are bound by these rules, standards and technical specifications. They are required to uphold them by their operator's licence.

Electrical safety clearances

It is essential that a safe distance is kept between the exposed conductors and people and objects when working near National Grid's electrical assets. A person does not have to touch an exposed conductor to get a life-threatening

electric shock. At the voltages National Grid operates at, it is possible for electricity to jump up to several metres from an exposed conductor and kill or cause serious injury to anyone who is nearby. For this reason, there are several legal requirements and safety standards that must be met.

Any breach of legal safety clearances will be enforced in the courts. This can and has resulted in the removal of an infringement, which is normally at the cost of the developer or whoever caused it to be there. Breaching safety clearances, even temporarily, risks a serious incident that could cause serious injury or death.

National Grid will, on request, advise planning authorities, developers or third parties on any safety clearances and associated issues. We can supply detailed drawings of all our overhead line assets marked up with relevant safe areas.



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Your Responsibilities - Overhead lines

Work which takes place near overhead power lines carries a significant risk of coming into proximity with the wires. If any person, object or material gets too close to the wires, electricity could 'flashover' and be conducted to earth, causing death or serious injury. You do not need to touch the wires for this to happen. The law requires that work is carried out in close proximity to live overhead power lines only when there is no alternative, and only when the risks are acceptable and can be properly controlled. Statutory clearances exist which must be maintained, as prescribed by the Electricity Safety, Quality and Continuity Regulations 2002.

Under the Health and Safety at Work etc. Act 1974 and Management of Health and Safety at Work Regulations 1999, you are responsible for preparing a suitable and sufficient risk assessment and safe systems of work, to ensure that risks are managed properly and the safety of your workforce and others is maintained. Your risk assessment must consider and manage all of the significant risks and put in place suitable precautions/controls in order to manage the work safely. You are also responsible for ensuring that the precautions identified are properly implemented and stay in place throughout the work.

Work near overhead power lines must always be conducted in accordance with GS6, 'avoiding danger from overhead power lines', and any legislation which is relevant to the work you are completing.

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What National Grid will provide

National Grid can supply profile drawings in PDF and CAD format showing tower locations and relevant clearances to assist you in the risk assessment process.

What National Grid will not provide

National Grid will not approve safe systems of work or approve design proposals

Part 3

What National Grid will do for you and your development

Provision of information

National Grid should be notified during the planning stage of any works or developments taking place near our electrical assets, ideally a minimum notification period of 8 weeks to allow National Grid to provide the following services:

Drawings

National Grid will provide relevant drawings of overhead lines or underground cables to make sure the presence and location of our services are known. Once a third party or developer has contacted us, we will supply the drawings for free.

400kV

The maximum nominal voltage of the underground cables in National Grid's network

Risk or impact identification

National Grid can help identify any hazards or risks that the presence of our assets might bring to any works or developments. This includes both the risk to safety from high-voltage electricity and longer-term issues, such as induced currents, noise and maintenance access that may affect the outcome of the development. National Grid will not authorise specific working procedures, but we can provide advice on best practice.





Risks or hazards to be aware of

This section includes a brief description of some of the hazards and issues that a third party or developer might face when working or developing close to our electrical infrastructure.

Land and access

National Grid has land rights in place with landowners and occupiers, which cover our existing overhead lines and underground cable network. These agreements, together with legislation set out under the *Electricity Act 1989*, allow us to access our assets to maintain, repair and renew them. The agreements also lay down restrictions and covenants to protect the integrity of our assets and meet safety regulations. Anyone proposing a development close to our assets should carefully examine these agreements.

Our agreements often affect land both inside and outside the immediate vicinity of an asset. Rights will include the provision of access, along with restrictions that ban the development of land through building, changing levels, planting and other operations. Anyone looking to develop close to our assets must consult with National Grid first.

For further information, contact Asset Protection:

Email: assetprotection@nationalgrid.com
Phone: 0800 001 4282

Electrical clearance from overhead lines

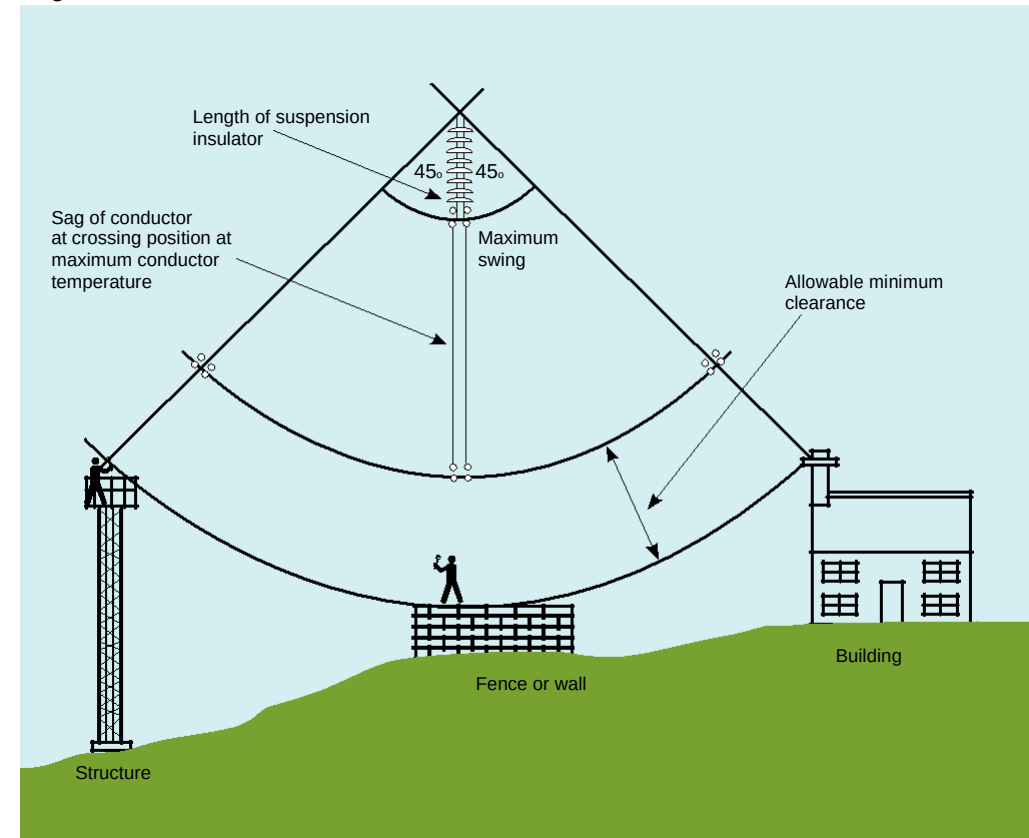
The clearance distances referred to in this section are specific to 400kV overhead lines. National Grid can advise on the distances required around different voltages i.e. 132kV and 275kV.

As we explained earlier, *Electrical Networks Association TS 43-8* details the legal clearances to our overhead lines. The minimum clearance between the conductors of an overhead line and the ground is 7.3m at maximum sag. The sag is the vertical distance between the wire's highest and lowest point. Certain conditions, such as power flow, wind speed and air temperature can cause conductors to move and allowances should be made for this.

The required clearance from the point where a person can stand to the conductors is 5.3m. To be clear, this means there should be at least 5.3m from where someone could stand on any structure (i.e. mobile and construction equipment) to the conductors. Available clearances will be assessed by National Grid on an individual basis.

National Grid expects third parties to implement a safe system of work whenever they are near Overhead Lines.

Diagram not to scale



There should be at least 5.3m between the conductors and any structure someone could stand on

We recommend that guidance such as *HSE Guidance Note GS6 (Avoiding Danger from Overhead Power Lines)* is followed, which provides advice on how to avoid danger from all overhead lines, at all voltages. If you are carrying out work near overhead lines you must contact National Grid, who will provide the relevant profile drawings.

7.3m

The required minimum clearance between the conductors of an overhead line, at maximum sag, and the ground

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The undergrounding of electricity cables at Ross-on-Wye

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Underground cables Underground cables operating at up to 400kV are a significant part of the National Grid Electricity Transmission network. When your works will involve any ground disturbance it is expected that a safe system of work is put in place and that you follow guidance such as *HSG 47 (Avoiding Danger from Underground Services)*.

You must contact National Grid to find out if there are any underground cables near your proposed works. If there are, we will provide cable profiles and location drawings and, if required, on-site supervision of the works. Cables can be laid under roads or across industrial or agricultural land. They can even be laid in canal towpaths and other areas that you would not expect.

Cables crossing any National Grid high-voltage (HV) cables directly buried in the ground are required to maintain a minimum separation that will be determined by National Grid on a case-by-case basis. National Grid will need to do a rating study on the existing cable to work out if there are any adverse effects on either cable rating. We will only allow a cable to cross such an area once we know the results of the re-rating. As a result, the clearance distance may need to be increased or alternative methods of crossing found.

For other cables and services crossing the path of our HV cables, National Grid will need confirmation that published standards and clearances are met.

Impressed voltage

Any conducting materials installed near high-voltage equipment could be raised to an elevated voltage compared to the local earth, even when there is no direct contact with the high-voltage equipment. These impressed voltages are caused by inductive or capacitive coupling between the high-voltage equipment and nearby conducting materials and can occur at distances of several metres away from the

equipment. Impressed voltages may damage your equipment and could potentially injure people and animals, depending on their severity. Third parties should take impressed voltages into account during the early stages and initial design of any development, ensuring that all structures and equipment are adequately earthed at all times.

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Earth potential rise

Under certain system fault conditions – and during lightning storms – a rise in the earth potential from the base of an overhead line tower or substation is possible. This is a rare phenomenon that occurs when large amounts of electricity enter the earth. This can pose a serious hazard to people or equipment that are close by.

We advise that developments and works are not carried out close to our tower bases, particularly during lightning storms.

Noise

Noise is a by-product of National Grid's operations and is carefully assessed during the planning and construction of any of our equipment. Developers should consider the noise emitted from National Grid's sites or overhead lines when planning any developments, particularly housing. Low-frequency hum from substations can, in some circumstances, be heard up to 1km or more from the site, so it is essential that developers find adequate solutions for this in their design. Further information about likely noise levels can be provided by National Grid.

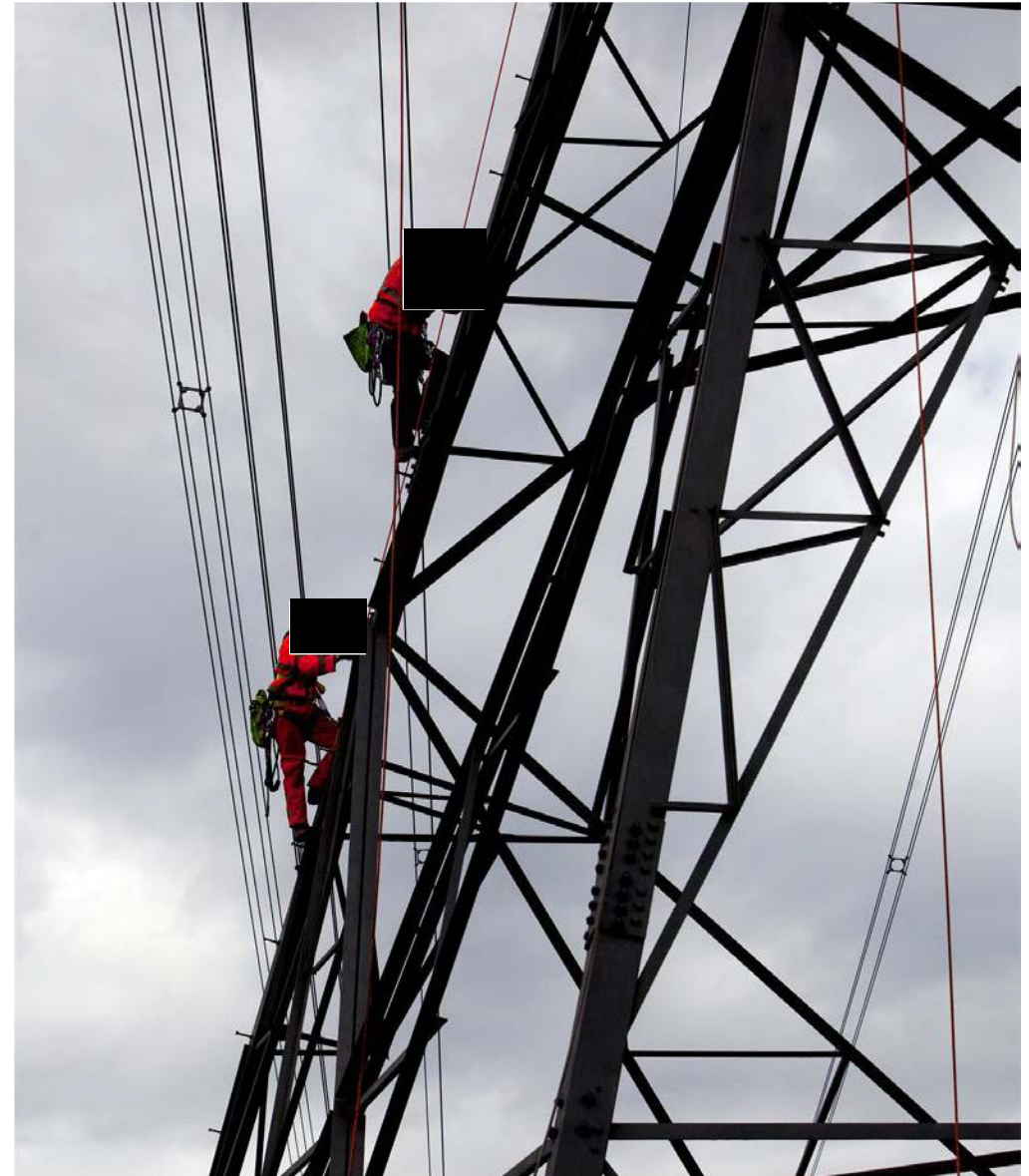
Maintenance access

National Grid needs to have safe access for vehicles around its assets and work that restricts this will not be allowed. In terms of our overhead lines, we wouldn't want to see any excavations made, or permanent structures built, that might affect the foundations of our towers. The size of the foundations around a tower base depends on the type of tower that is built there. If you wish to carry out works within 30m of the tower base, contact National Grid for more information. Our business has to maintain access routes to tower bases with land owners. For that reason, a route wide enough for an HGV must be permanently available. We may need to access our sites, towers, conductors and underground cables at short notice.

30m

If you wish to carry out work within this distance of the tower base, you must contact National Grid for more information

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previous page

Fires and firefighting

National Grid does not recommend that any type of flammable material is stored under overhead lines. Developers should be aware that in certain cases the local fire authority will not use water hoses to put out a fire if there are live, high-voltage conductors within 30m of the seat of the fire (*as outlined in ENA TS 43-8*).

In these situations, National Grid would have to be notified and reconfigure the system – to allow staff to switch out the overhead line – before any firefighting could take place. This could take several hours.

We recommend that any site which has a specific hazard relating to fire or flammable material should include National Grid's emergency contact details (found at the beginning and end of this document) in its fire plan information, so any incidents can be reported.

Developers should also make sure their insurance cover takes into account the challenge of putting out fires near our overhead lines.

Excavations, piling or tunnelling

You must inform National Grid of any works that have the potential to disturb the foundations of our substations or overhead line towers. This will have to be assessed by National Grid engineers before any work begins.

BS ISO 4866:2010 states that a minimum distance of 200m should be maintained when carrying out quarry blasting near our assets. However, this can be reduced with specific site surveys and changes to the maximum instantaneous charge (the amount of explosive detonated at a particular time).

All activities should observe guidance layed out in *BS 5228-2:2009*.

Microshocks

High-voltage overhead power lines produce an electric field. Any person or object inside this field that isn't earthed picks up an electrical charge. When two conducting objects – one that is grounded and one that isn't – touch, the charge can equalise and cause a small shock, known as a microshock. While they are not harmful, they can be disturbing for the person or animal that suffers the shock.

For these reasons, metal-framed and metal-clad buildings which are close to existing overhead lines should be earthed to minimise the risk of microshocks. Anything that isn't earthed, is conductive and sits close to the lines is likely to pick up a charge. Items such as deer fences, metal palisade fencing, chain-link fences and metal gates underneath overhead lines all need to be earthed.

For further information on microshocks please visit www.emfs.info.



200m

*The minimum distance that
should be maintained from
National Grid assets when
quarry blasting*

Specific development guidance

Wind farms

National Grid's policy towards wind farm development is closely connected to the *Electricity Networks Association Engineering Recommendation L44 Separation between Wind Turbines and Overhead Lines, Principles of Good Practice*. The advice is based on national guidelines and global research. It may be adjusted to suit specific local applications.

There are two main criteria in the document:

- (i) The turbine shall be far enough away to avoid the possibility of toppling onto the overhead line
- (ii) The turbine shall be far enough away to avoid damage to the overhead line from downward wake effects, also known as turbulence

The toppling distance is the minimum horizontal distance between the worst-case pivot point of the wind turbine and the conductors hanging in still air. It is the greater of:

- the tip height of the turbine plus 10%
- or, the tip height of the turbine plus the electrical safety distance that applies to the voltage of the overhead line.

To minimise the downward wake effect on an overhead line, the wind turbine should be three times the rotor distance away from the centre of the overhead line.

Wake effects can prematurely age conductors and fittings, significantly reducing the life of the asset. For that reason, careful consideration should be taken if a wind turbine needs to be sited within the above limits. Agreement from National Grid will be required.

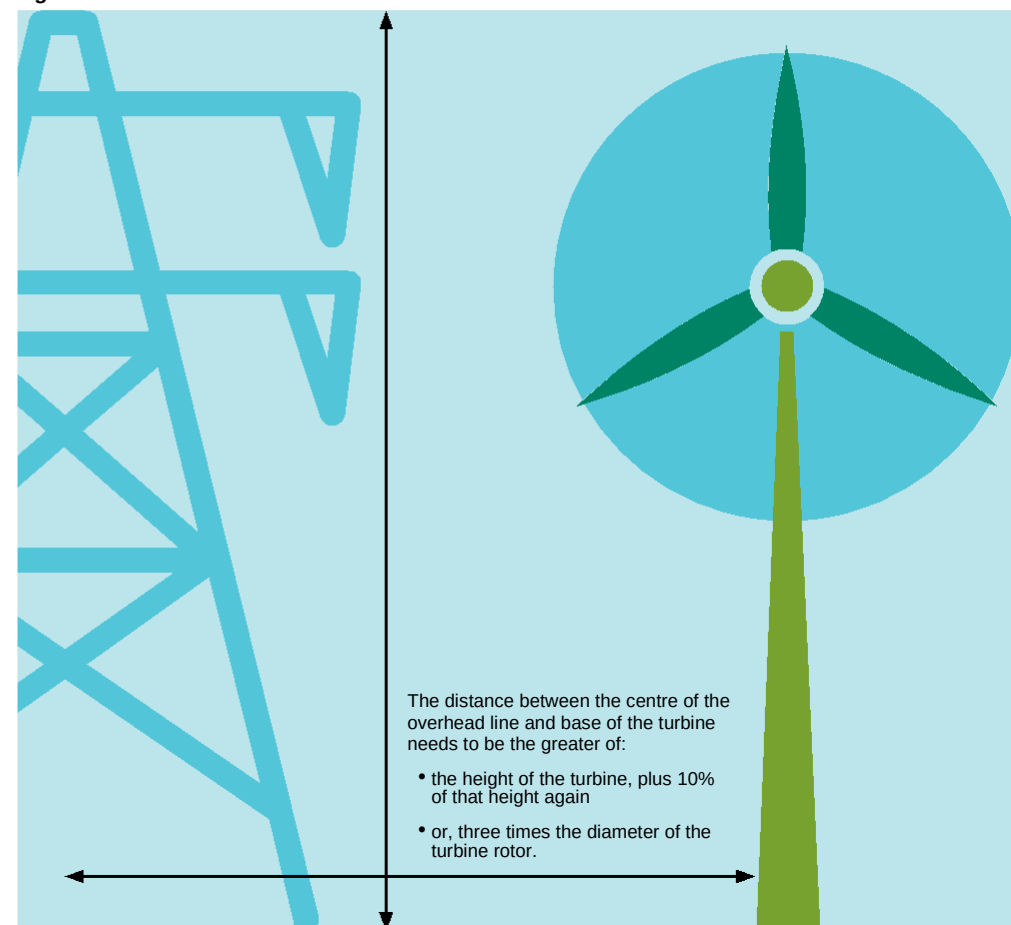
Commercial and housing developments

National Grid has developed a document called *Design guidelines for development near pylons and HVO power lines*, which gives advice to anyone involved in planning or designing large-scale developments that are crossed by, or close to, overhead lines.

The document focuses on existing 275kV and 400kV overhead lines on steel lattice towers, but can equally apply to 132kV and below. The document explains how to design large-scale developments close to high-voltage lines, while respecting clearances and the development's visual and environmental impact.

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Diagram not to scale



Turbines should be far enough away to avoid the possibility of toppling onto the overhead line



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The advice is intended for developers, designers, landowners, local authorities and communities, but is not limited to those organisations.

Overall, developers should be aware of all the hazards and issues relating to the electrical equipment that we have discussed when designing new housing.

As we explored earlier, National Grid's assets have the potential to create noise. This can be low frequency and tonal, which makes it quite noticeable. It is the responsibility of developers to take this into account during the design stage and find an appropriate solution.

Solar farms

While there is limited research and recommendations available, there are several key factors to consider when designing Solar Farms in the vicinity of Overhead Power Lines.

Developers may be looking to build on arable land close to National Grid's assets. In keeping with the safety clearance limits that we outlined earlier for solar panels directly underneath overhead line conductors, the highest point on the solar panels must be no more than 5.3m from the lowest conductors.

This means that the maximum height of any structure will need to be determined to make sure safety clearance limits aren't breached. This could be as low as 2m. National Grid will supply profile drawings to aid the planning of solar farms and determine the maximum height of panels and equipment.

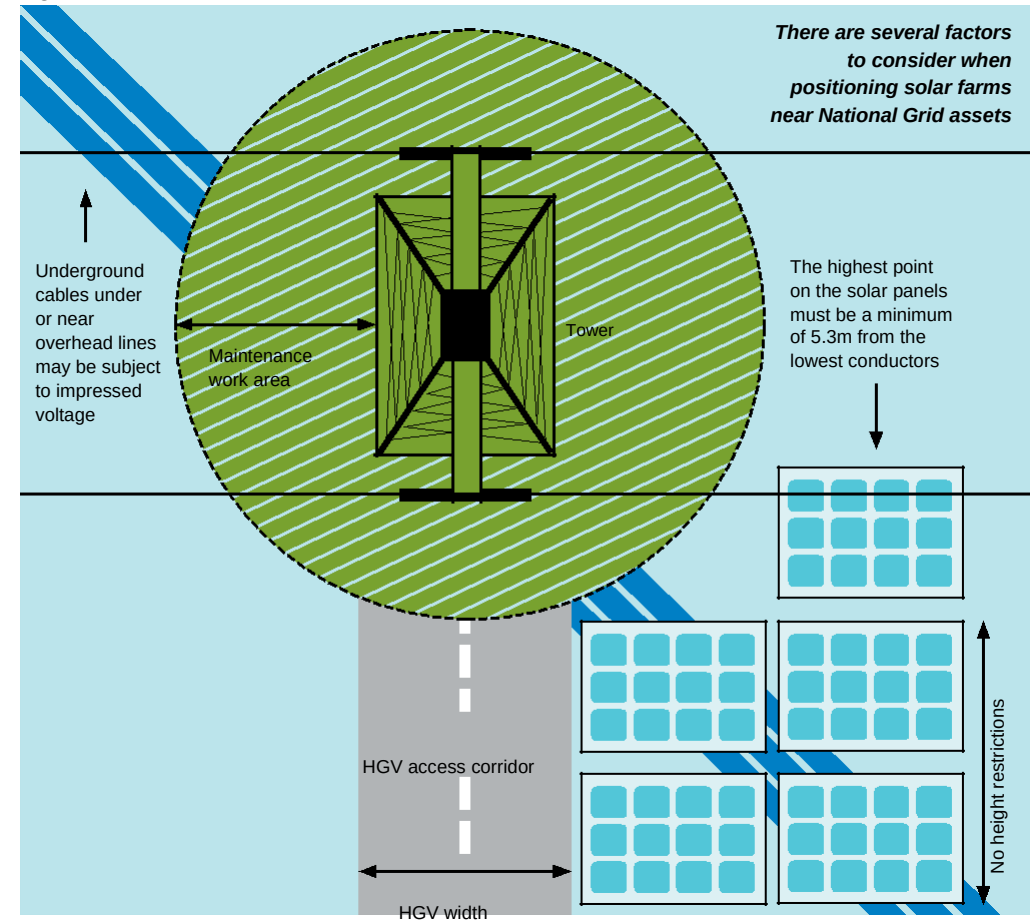
Solar panels that are directly underneath power lines risk being damaged on the rare occasion that a conductor or fitting falls to the ground. A more likely risk is ice falling from conductors or towers in winter and damaging solar panels.

There is also a risk of damage during adverse weather conditions, such as lightning storms, and system faults. As all our towers are earthed, a weather event such as lightning can cause a rise in the earth potential around the base of a tower. Solar panel support structures and supply cables should be adequately earthed and bonded together to minimise the effects of this temporary rise in earth potential.

Any metallic fencing that is located under an overhead line will pick up an electrical charge. For this reason, it will need to be adequately earthed to minimise microshocks to the public.

For normal, routine maintenance and in an emergency National Grid requires unrestricted access to its assets. So if a tower is enclosed in a solar farm compound, we will need full access for our vehicles,

Diagram not to scale



Including access through any compound gates. During maintenance – and especially re-conductoring – National Grid would need enough space near our towers for winches and cable drums. If enough space is not available, we would require solar panels to be temporarily removed.



Asset protection agreements

In some cases, where there is a risk that development will impact on National Grid's assets, we will insist on an asset protection agreement being put in place. The cost of this will be the responsibility of the developer or third party.

Contact details

Emergency situations

If you spot a potential hazard on or near an overhead electricity line, do not approach it, even at ground level. Keep as far away as possible and follow the six steps below:

- Warn anyone close by to evacuate the area
- Call our 24-hour electricity emergency number: 0800 404 090 (Option 1)¹
- Give your name and contact phone number
- Explain the nature of the issue or hazard
- Give as much information as possible so we can identify the location – i.e. the name of the town or village, numbers of nearby roads, postcode and (ONLY if it can be observed without putting you or others in danger) the tower number of an adjacent pylon
- Await further contact from a National Grid engineer

¹ It is critically important that you don't use this phone number for any other purpose. If you need to contact National Grid for another reason please use our Contact Centre at www2.nationalgrid.com/contact-us to find the appropriate information or call 0800 0014282.

Routine enquiries

Email:
assetprotection@nationalgrid.com

Call Asset Protection on:
0800 0014282

Opening hours:
Monday to Friday 08:00-16:00

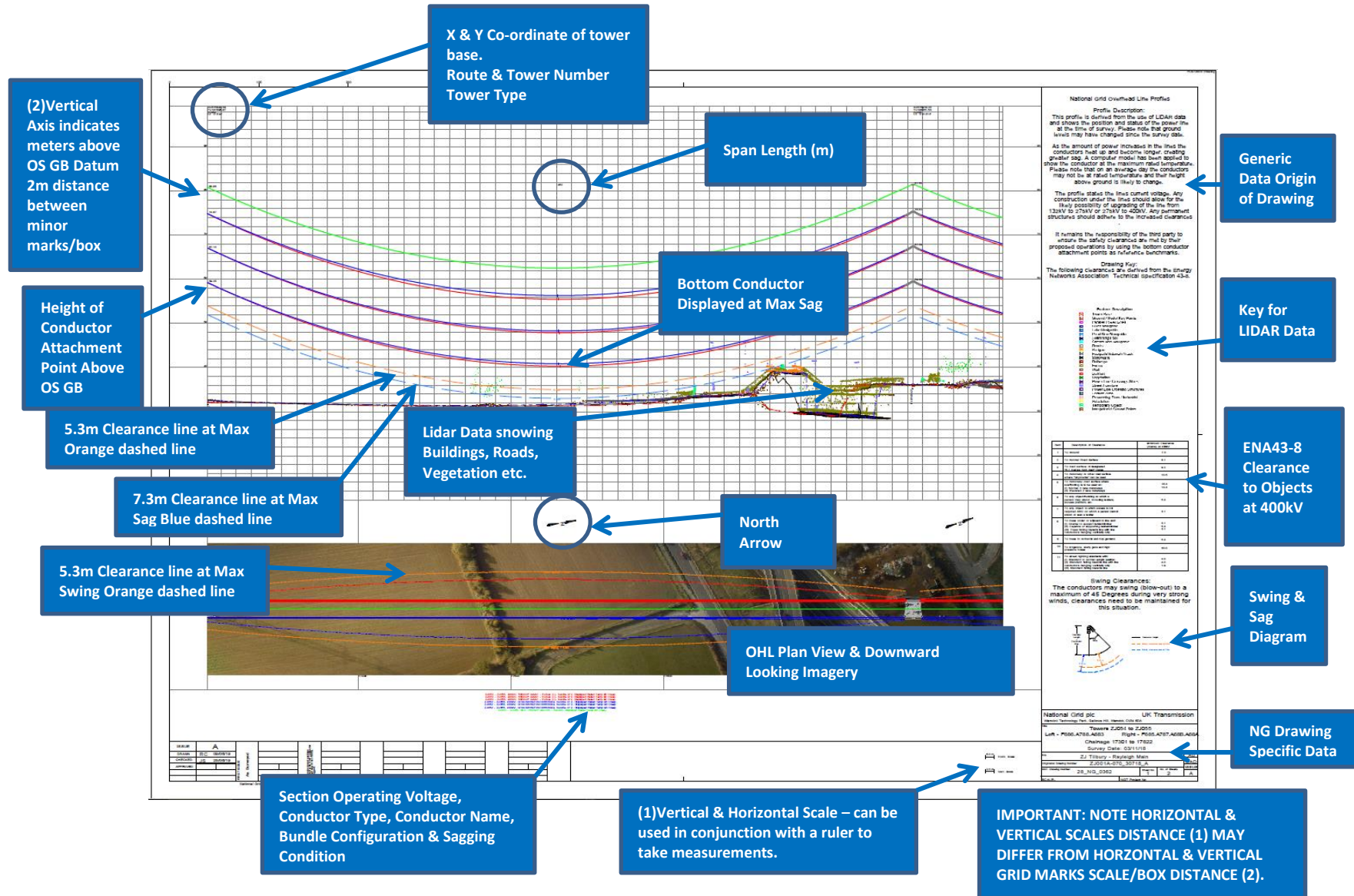
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14 APPENDIX A



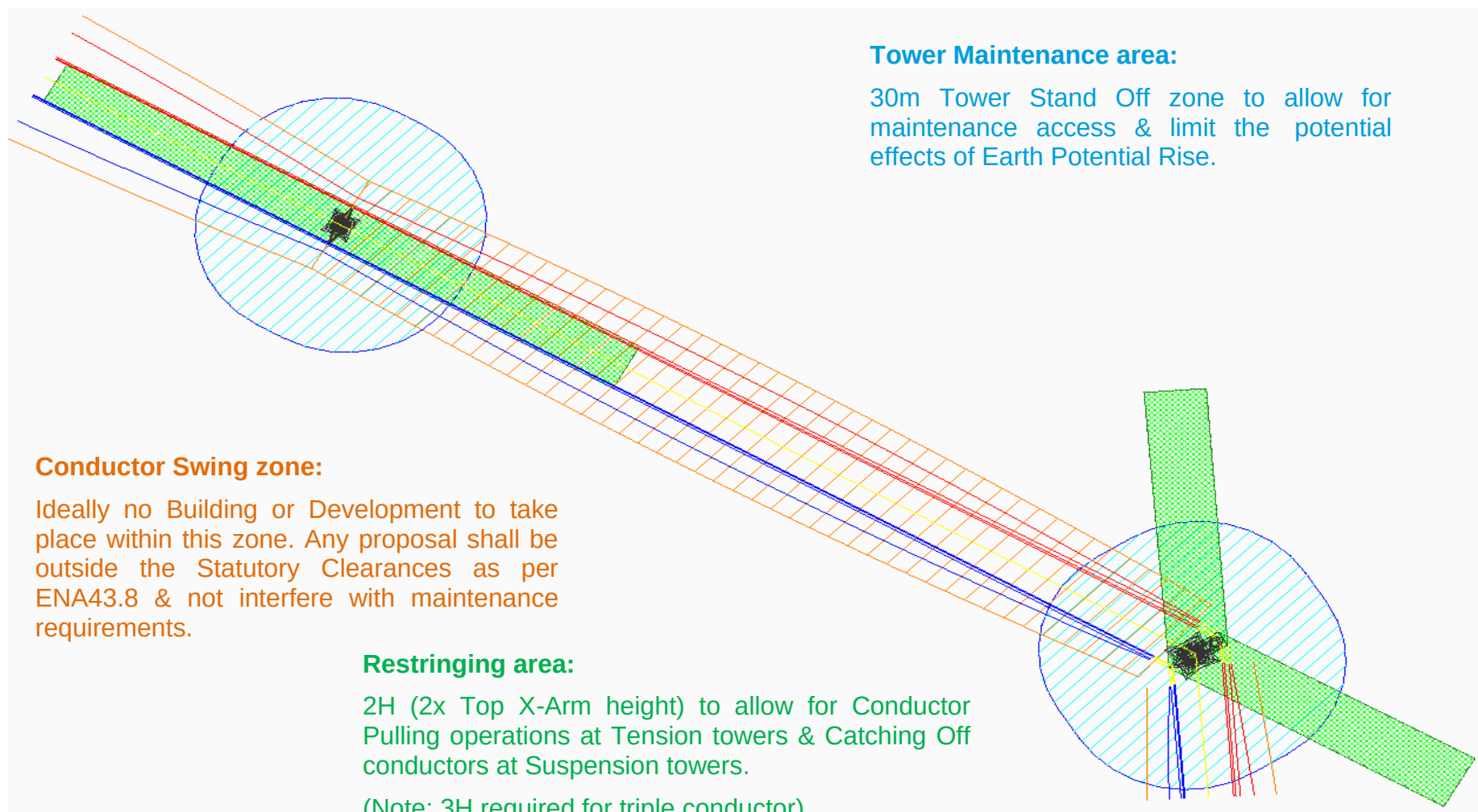
OHL Profile Drawing Guide



15 APPENDIX B



OHL Tower Stand Off & Reconductoring Area





Our ref: NE_HMWF
Your ref: EN0110038

██████████
Planning and Development
National Highways
8 City Walk
Leeds
LS11 9AT

██
11 June 2026

FAO: HopeMoorWindFarm@planninginspectorate.gov.uk

Dear Sir/Madam,

Hope Moor Wind Farm

Thank you for consulting National Highways ("NH") for our comments on the Environmental Impact Assessment (EIA) Scoping Report, relating to the proposed development of the Hope Moor Wind Farm ("the Proposed Development").

The Project as set out within the Environmental Impact Assessment (EIA) Scoping Report is to construct and operate an onshore wind turbine generating station, which would be located on a site crossing the administrative areas of Durham County Council and North Yorkshire Council. The wind farm is currently proposed with approximately 23 turbines, each up to 200m in height (to blade tip), with a generating capacity greater than 100MW.

It is noted from the map on the developer's website (<https://hopemoor.co.uk/about/our-proposals/>) that the proposed development does not encroach onto the Strategic Road Network (SRN). However, the proposed development does create the need for this review to ensure that the proposed development does not materially impact upon the capacity, operation and safety of the SRN, in this case the A66 Trunk Road.

Environmental Impact Assessment (EIA) Scoping Report

This Statutory Consultation on the Environmental Impact Assessment (EIA) Scoping Report, dated 28th May 2026, runs to Tuesday 30th June 2026.

The submitted EIA Scoping Report sets out that the Proposed Development comprises the construction and operation of an onshore wind turbine generating station. The wind farm is currently proposed with a maximum of 23 turbines, with a tip height of up to 200m and associated development which may include hardstanding areas, access tracks and site accesses, watercourse crossing, Haul Route for construction vehicles, on-Site substation(s) and compound(s), temporary construction compounds, batching plant, borrow pits, on-Site underground cabling, drainage, CCTV, fencing, anemometry mast(s), offsite street works to mitigate overrun and oversail, services and internal cabling work). The Project would have a gross electrical output capacity of at least 100 Megawatts (MW).

National Highways has reviewed the project red line boundary and we are content that the proposed development does not cross or encroach on to NH assets or the SRN.

Construction Phase

Construction Programme

The EIA Scoping Report sets out that subject to development consent being granted for the Project, it is currently anticipated that construction of the Project could commence in 2030 and is likely to be completed over a period of approximately 18 months.

Construction Hours

The EIA Scoping Report advises that construction activities are likely to be carried out 07:00 to 19:00 Monday to Friday and 07:00 to 13:00 on Saturdays. Working would not be permitted on Sundays or Public Holidays. It should be noted that out of necessity some activities, for example abnormal load deliveries, concrete pouring for foundations and the lifting of turbine components may require exceptions to these specified working hours.

Construction activities taking place outside of specified hours would be notified to the local authorities within 48 hours of any works taking place. Local residents would also be kept informed of the proposed working schedule, where appropriate, including the times and durations of any abnormal loads and abnormally noisy activities.

National Highways notes that construction workers will typically travel outside of peak hours and as the site is in a rural location away from the SRN trips generated by construction workers will be distributed with minimal impact across the SRN and LRN.

Construction workforce

Notwithstanding this, the EIA Scoping report has not provided any information on the predicted quantum of construction workers during the construction phase and due to this National Highways requests that this information is provided. This will enable us to understand the likely quantum of construction worker trips accessing the site and the likely impact on the SRN.

Construction Environmental Management Plans (CEMP)

It is understood that a Construction Environmental Management Plan (CEMP) would set out the principles and procedures for the environmental management of the Project during construction. The CEMP would aim to describe how any potential adverse effects from construction on the environment and local communities would be controlled and minimised as far as reasonably practicable. It would describe good industry practice for the management of the environment and would form the framework for more detailed construction mitigation plans.

Construction Traffic Management Plan (CTMP)

The EIA Scoping Report advises that the movement of materials, waste, construction workforce and plant require careful management with respect to transport movements. Traffic management measures would be covered in a Construction Traffic Management Plan (CTMP) to be agreed with the appropriate Highway Authority to minimise traffic disruption. The CTMP measures would manage the movement of wind turbine

components, construction materials and plant and general construction traffic to the Site, to reduce delays on other road users, and minimise interference with local traffic.

The CTMP would set out how transport movements would be managed on the highway network, routes for Heavy Goods Vehicles (HGVs), details and management of any abnormal indivisible loads, with details / timings of any road closures. Construction access and highway modifications would also be developed and outlined in the CTMP.

National Highways advise that based on our experience of wind farm schemes that the construction phase usually has the greatest quantum of vehicle movements although once these are distributed across the network and at the time they are likely to be occurring they would normally be expected to have minimal impact on the SRN. However, we request that we continue to be consulted on this application as it progresses and especially with regard to Abnormal Indivisible Loads using our network, between Able Seaton Port and Teesport to the site via the SRN (A1(M), A66(M), A66), for which the applicant will require our agreement and advice in using the SRN for these movements.

To ensure that the interests of the SRN are safeguarded, NH will seek an approval right in respect of the relevant DCO requirement which secures the CTMP. We recommend that the Applicant drafts the relevant DCO requirement to include NH as an approving highway authority with respect to matters concerning the SRN at the point of application submission to avoid the applicant incurring costs in defending against NH's stated position in examination and to ensure the appropriate highway authority has the benefit of the relevant approval right.

It should be noted that any abnormal loads would need to be approved via Electronic Service Delivery for Abnormal Loads (EDSAL) - <https://nationalhighways.co.uk/road-safety/abnormal-loads-and-the-esdal-system>.

Operational Phase

We understand from the EIA Scoping report that the Project would become operational in 2031 and is expected to have an operational life of up to 30 years from the first commissioning (export to the electrical grid).

During the operation and maintenance phase of the Project, on-Site activities would be limited in extent. The wind turbines would operate automatically and would be monitored remotely. Routine site visits would be undertaken periodically for the maintenance and inspection of wind turbines and electrical infrastructure, and other site management activities including vegetation and habitat management, and the maintenance of other other-Site infrastructure such as access track and drainage features.

Based on the above and National Highways experience we would expect vehicle movements during the operational phase to be minimal and have no material impact on the SRN.

Decommissioning Phase

At the end of its operational life, the Project would be decommissioned unless an application is submitted to extend the operational period or to repower the Site. The decommissioning phase would be expected to take up to 12 months. The

decommissioning phase would involve the dismantling and removal of wind turbines from the Site and the top 1m of the wind turbine foundations and hardstanding's being removed and disposed of appropriately.

The excavated foundations and hardstandings would be reprofiled with soil and reseeded. Any new access tracks would be decommissioned using the same method unless otherwise agreed with the landowners and the planning authority. Any upgraded access tracks would be left in situ, as would underground cabling subject to them being made safe and being 1m below ground. The on-Site sub-station and any associated equipment would be removed and disposed of appropriately and the land would be restored to a satisfactory state.

Based on the above National Highways advises that vehicle movements during the decommissioning phase are usually less than the construction phase and therefore would normally have no material impact on the SRN. However, we welcome any forecasts of vehicle movements that the applicant can provide.

Protective Provisions

We advise that NH is a statutory undertaker and will require the Applicant to agree to its standard form protective provisions to safeguard the interests of the SRN and to ensure the protection of the public that use it.

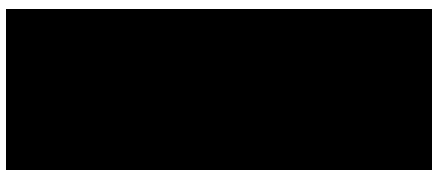
We recommend that the Applicant's appointed legal advisors contact our legal team LegalServicesInbox@nationalhighways.co.uk at the earliest possible opportunity to agree the provisions which will be included in the draft DCO at the point of submission of your application.

Please also note that pursuant to section 54A of the Planning Act 2008 and Regulation 12A of and Schedule 2 to the Infrastructure Planning (Fees) Regulations 2010 (as amended), NH is a prescribed public authority entitled to the recovery of its reasonable fees associated with any relevant service. These services cover all stages of the DCO process including pre-application consultation. The charging policy which NH applies can be found on our website - <https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england> .

National Highways welcomes further engagement with the applicant to discuss the DCO Application and its impacts on the SRN as the DCO progresses. Please note that these comments are provided on the basis of the information currently available to us and are made without prejudice to future advice and/or recommendations.

I trust this response is helpful, but should you require any further information please do not hesitate to contact me.

Yours sincerely,



Planning and Development

 @nationalhighways.co.uk

Our Ref: SG41588

Dear Sir/Madam

We refer to the application above. The proposed development has been examined by our technical safeguarding teams and conflicts with our safeguarding criteria.

Accordingly, NATS (En Route) plc objects to the proposal. The reasons for NATS's objection are outlined in the attached report TOPA SG41588.

We would like to take this opportunity to draw your attention to the legal obligation of local authorities to consult NATS before granting planning permission. The obligation to consult arises in respect of certain applications that would affect a technical site operated by or on behalf of NATS (such sites being identified by safeguarding plans that are issued to local planning authorities).

In the event that any recommendations made by NATS are not accepted, local authorities are obliged to follow the relevant directions within Planning Circular 2 2003 - Scottish Planning Series: Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2003 or Annex 1 - The Town And Country Planning (Safeguarded Aerodromes, Technical Sites And Military Explosives Storage Areas) Direction 2002.

These directions require that the planning authority notify both NATS and the Civil Aviation Authority ("CAA") of their intention. As this further notification is intended to allow the CAA to consider whether further scrutiny is required, the notification should be provided prior to any granting of permission.

It should also be noted that the failure to consult NATS, or to take into account NATS's comments when determining a planning application, could cause serious safety risks for air traffic.

Should you have any queries, please contact us using the details below.

Yours faithfully

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,

Fareham, Hants PO15 7FL

www.nats.co.uk

Technical and Operational Assessment (TOPA)

For Hope Moor
Wind Farm Development

NATS ref: SG41588

Planning Inspectorate ref: EN0110038

Issue 1

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Publication History

Issue	Month/Year	Change Requests and summary
1	June 2026	Scoping Request

Document Use

External use: Yes

Referenced Documents

1. Background

1.1. En-route Consultation

NATS en-route plc is responsible for the safe and expeditious movement in the en-route phase of flight for aircraft operating in controlled airspace in the UK. To undertake this responsibility it has a comprehensive infrastructure of RADAR's, communication systems and navigational aids throughout the UK, all of which could be compromised by the establishment of a wind farm.

In this respect NATS is responsible for safeguarding this infrastructure to ensure its integrity to provide the required services to Air Traffic Control (ATC).

In order to discharge this responsibility NATS is a statutory consultee for all wind farm applications, and as such assesses the potential impact of every proposed development in the UK.

The technical assessment sections of this document define the assessments carried out against the development proposed in section 3.

2. Scope

This report provides NATS En-Route plc's view on the proposed application in respect of the impact upon its own operations and in respect of the application details contained within this report.

Where an impact is also anticipated on users of a shared asset (e.g. a NATS RADAR used by airports or other customers), additional relevant information may be included for information only. While an endeavour is made to give an insight in respect of any impact on other aviation stakeholders, it should be noted that this is outside of NATS' statutory obligations and that any engagement in respect of planning objections or mitigation should be had with the relevant stakeholder, although NATS as the asset owner may assist where possible.

3. Application Details

Planning Inspectorate submitted a request for a NATS technical and operational assessment (TOPA) for the development at Hope Moor Wind Farm. It will comprise turbines as detailed in Table 1 and contained within an area as shown in the diagrams contained in Appendix B.

Turbine	Lat	Long	East	North	Tip Height (m)
T1	54.4478	-1.9254	404938	505823	200
T2	54.4452	-1.9360	404245	505539	200
T3	54.4494	-1.9352	404299	505998	200
T4	54.4491	-1.9456	403625	505964	200
T5	54.4504	-1.9521	403206	506118	200
T6	54.4560	-1.9614	402599	506732	200
T7	54.4610	-1.9578	402835	507293	200
T8	54.4633	-1.9480	403471	507548	200
T9	54.4592	-1.9486	403432	507091	200
T10	54.4565	-1.9432	403782	506792	200
T11	54.4653	-1.9347	404333	507774	200
T12	54.4628	-1.9288	404710	507491	200
T13	54.4582	-1.9314	404543	506977	200
T14	54.4554	-1.9275	404798	506672	200
T15	54.4528	-1.9225	405120	506382	200
T16	54.4603	-1.9196	405309	507217	200
T17	54.4574	-1.9153	405589	506892	200
T18	54.4621	-1.9071	406119	507412	200
T19	54.4582	-1.9045	406292	506987	200
T20	54.4531	-1.9103	405916	506417	200
T21	54.4512	-1.9024	406429	506202	200
T22	54.4467	-1.9016	406481	505704	200
T23	54.4466	-1.9109	405876	505694	200

Table 1 – Turbine Details

4. Assessments Required

The proposed development falls within the assessment area of the following systems:

En-route Surv	Lat	Long	nm	km	Az (deg)	Type
Claxby Radar	53.4501	-0.3083	82.3	152.5	317.1	CMB
Clee Hill Radar	52.3983	-2.5975	125.3	232.0	10.7	CMB
Great Dun Fell Radar	54.6841	-2.4509	21.8	40.4	126.9	CMB
Lowther Hill Radar	55.3778	-3.7530	83.1	153.8	130.5	CMB
St Annes Radar	53.7684	-2.9908	55.0	101.9	41.8	CMB
En-route Nav	Lat	Long	nm	km	Az (deg)	Type
None						
En-route AGA	Lat	Long	nm	km	Az (deg)	Type
None						

Table 2 – Impacted Infrastructure

4.1. En-route RADAR Technical Assessment

4.1.1. Predicted Impact on Great Dun Fell RADAR

Using the theory as described in Appendix A and development specific propagation profile it has been determined that the terrain screening available will not adequately attenuate the signal, and therefore this development is likely to cause false primary plots to be generated. A reduction in the RADAR's probability of detection, for real aircraft, is also anticipated.

4.1.2. En-route operational assessment of RADAR impact

Where an assessment reveals a technical impact on a specific NATS' RADAR, the users of that RADAR are consulted to ascertain whether the anticipated impact is acceptable to their operations or not.

Unit or role	Comment
Swanwick Centre ATC	Unacceptable
Prestwick Centre ATC	Unacceptable
Military ATC	Acceptable

Note: The technical impact, as detailed above, has also been passed to non-NATS users of the affected RADAR, this may have included other planning consultees such as the MOD or other airports. Should these users consider the impact to be unacceptable it is expected that they will contact the planning authority directly to raise their concerns.

4.2. En-route Navigational Aid Assessment

4.2.1. Predicted Impact on Navigation Aids

No impact is anticipated on NATS' navigation aids.

4.3. En-route Radio Communication Assessment

4.3.1. Predicted Impact on the Radio Communications Infrastructure

No impact is anticipated on NATS' radio communications infrastructure.

5. Conclusions

5.1. En-route Consultation

The proposed development has been examined by technical and operational safeguarding teams. A technical impact is anticipated, this has been deemed to be unacceptable.

Appendix A – Background RADAR Theory

Primary RADAR False Plots

When RADAR transmits a pulse of energy with a power of P_t the power density, P , at a range of r is given by the equation:

$$P = \frac{G_t P_t}{4\pi r^2}$$

Where G_t is the gain of the RADAR's antenna in the direction in question.

If an object at this point in space has a RADAR cross section of σ , this can be treated as if the object re-radiates the pulse with a gain of σ and therefore the power density of the reflected signal at the RADAR is given by the equation:

$$P_a = \frac{\sigma P}{4\pi r^2} = \frac{\sigma G_t P_t}{(4\pi)^2 r^4}$$

The RADAR's ability to collect this power and feed it to its receiver is a function of its antenna's effective area, A_e , and is given by the equation:

$$P_r = P_a A_e = \frac{P_a G_r \lambda^2}{4\pi} = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4}$$

Where G_r is the RADAR antenna's receive gain in the direction of the object and λ is the RADAR's wavelength.

In a real world environment this equation must be augmented to include losses due to a variety of factors both internal to the RADAR system as well as external losses due to terrain and atmospheric absorption.

For simplicity these losses are generally combined in a single variable L .

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r^4 L}$$

Secondary RADAR Reflections

When modelling the impact on SSR the probability that an indirect signal reflected from a wind turbine has the signal strength to be confused for a real interrogation or reply can be determined from a similar equation:

$$P_r = \frac{\sigma G_t G_r \lambda^2 P_t}{(4\pi)^3 r_t^2 r_r^2 L}$$

Where r_t and r_r are the range from RADAR-to-turbine and turbine-to-aircraft respectively. This equation can be rearranged to give the radius from the turbine within which an aircraft must be for reflections to become a problem.

$$r_r = \sqrt{\frac{\lambda^2}{(4\pi)^3}} \sqrt{\frac{\sigma G_t G_r P_t}{r_t^2 P_r L}}$$

Shadowing

When turbines lie directly between a RADAR and an aircraft not only do they have the potential to absorb or deflect, enough power such that the signal is of insufficient level to be detected on arrival.

It is also possible that azimuth determination, whether this done via sliding window or monopulse, can be distorted giving rise to inaccurate position reporting.

Terrain and Propagation Modelling

All terrain and propagation modelling is carried out by a software tool called ICS Telecom (version 11.1.7). All calculations of propagation losses are carried out with ICS Telecom configured to use the ITU-R 526 propagation model.

Appendix B – Diagrams



Figure 1: Proposed development location shown on an airways chart

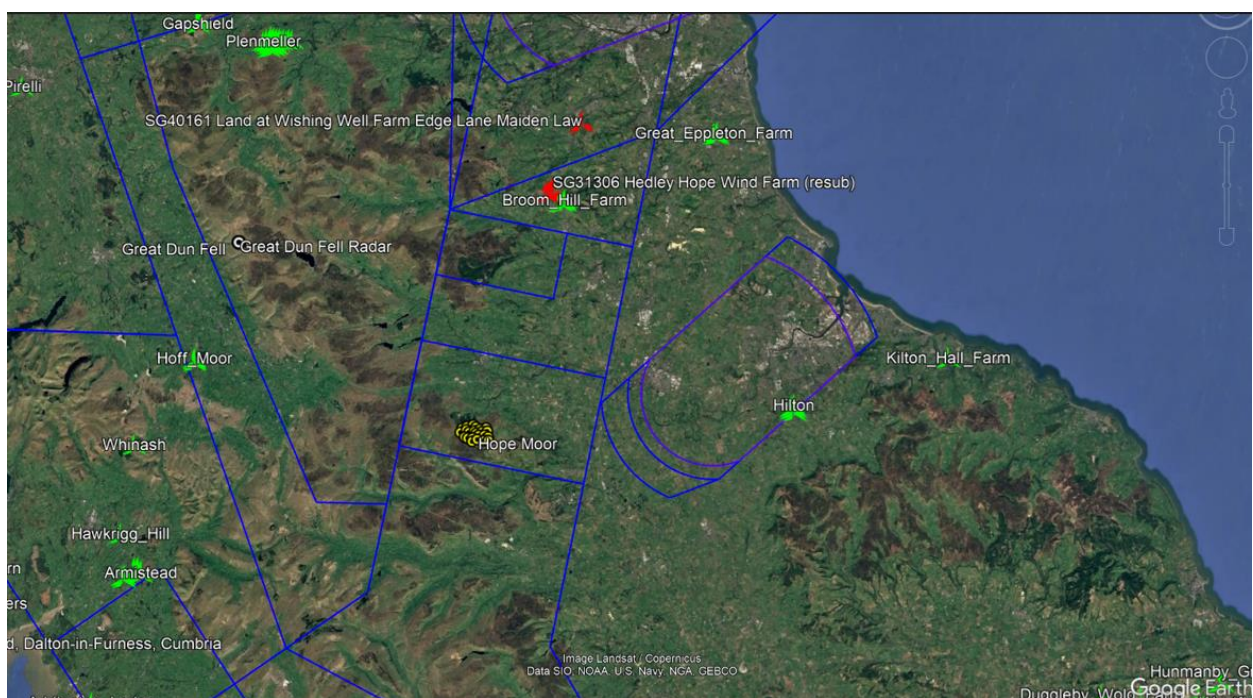


Figure 2: Proposed development shown alongside other recently assessed applications



Date: 26 June 2026
Our ref: 549825
Your ref: EN0110038



HopeMoorWindFarm@planninginspectorate.gov.uk

BY EMAIL ONLY

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Electra Way
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CW1 6GJ

T 0300 060 900

Dear Inspector

Environmental Impact Assessment Scoping Consultation under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulation 11

Proposal: Hope Moor Wind Farm

Location: approximately 8km to the south of Barnard Castle and 12km north of Richmond across the administrative areas of Durham County Council and North Yorkshire Council.

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 29 May 2026

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities, based on relevant and up to date environmental information, should be undertaken prior to an application for a Development Consent Order (DCO). Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for the proposed development.

The environmental considerations for this scheme are highly complex. Therefore, we highlight the importance of the provision of detailed evidence and assessments at an early stage of the process. We strongly advise that an **Evidence Plan** would be beneficial for this project to inform the Habitats Regulations Assessment (HRA) and other environmental assessments.

There has not been any pre-application engagement between the Applicant and Natural England prior to the issuing of the EIA Scoping Report. Going forward, Natural England would wish to work with the Applicant on the issues outlined within this letter via the Discretionary Advice Service (DAS).

At the present stage Natural England's most significant concerns within the proposed application are summarised below;

1. International designated sites

- The project has potential to significantly impact upon birds associated with North Pennine Moors SPA which may use the development site as foraging habitat. A suitable level of bird survey should be undertaken for the project to determine the level of impact and the requirements for mitigation.
- The project is proposed to be sited upon peatland outside of a designated site. However it should be considered that there could be wider habitat impacts due to hydrological connection, and therefore there may be damage to or loss of habitat within SACs in proximity to the proposed application site.

2. Protected landscapes

- The project is located in the setting of four protected landscapes, namely; Yorkshire Dales National Park, North Pennines National Landscape, Nidderdale National Landscape, North York Moors National Park. All of these Protected Landscapes are within the zone of theoretical visibility (ZTV) for the proposed development.
- The scoping report does not currently acknowledge the LURA duty on relevant authorities to seek to further the purposes of Protected Landscapes.

3. Loss of or damage to irreplaceable habitats

- The project redline boundary is located on peat habitats. The total permanent habitat loss arising from all infrastructure and construction activities must be clearly calculated and presented.
- The carbon emissions and changes to carbon storage and sequestration over time, resulting from the loss of (or impacts to) semi-natural habitats and the associated peat carbon stores should also be considered.

Detailed advice on scoping the Environmental Statement is available in the attached Annex A.

For any further advice on this consultation please contact the case officer
Lisa.Sheldon@naturalengland.org.uk and copy to consultations@naturalengland.org.uk.

Yours sincerely



Yorkshire and Northern Lincolnshire Area Team
Natural England

Annex A – Natural England’s Advice on EIA Scoping

1. General principles

Regulation 11 of the Infrastructure Planning Regulations 2017 - (The EIA Regulations) sets out the information that should be included in an ES to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Appropriately scaled and referenced plans which clearly show the information and features associated with the development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects and matters requested to be scoped out of further assessment with adequate justification provided¹.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- An outline of the structure of the proposed ES.

2. Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects
- b. approved but uncompleted projects
- c. ongoing activities
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an

¹ National Infrastructure Planning [Advice Note Seven, Environmental Impact Assessment, Process, Preliminary Environmental Information and Environmental Statements](#) (see Insert 2 – information to be provided with a scoping request)

application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects

Table 1: Plans or projects that Natural England is aware of that might need to be considered in the ES	
Project/Plan	Application Stage
Calderdale Energy Park NSIP	Pre application (EN0110023)
Ray II Windfarm NSIP	Pre application (EN0110031)

3. Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at www.magic.gov.uk. This includes Marine Conservation Zone GIS shapefiles.

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local Wildlife Trust, local geo-conservation group or other recording society.

4. Biodiversity and geodiversity

The assessment will need to include potential impacts of the proposal upon sites and features of nature conservation interest as well as opportunities for nature recovery through biodiversity net gain (BNG). There might also be strategic approaches to take into account.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) and an [EclA checklist](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

Many public authorities e.g. National Highways and National Grid have biodiversity duties including taking opportunities for habitat restoration or enhancement. They might have Key Performance Indicators (KPIs) to adhere to via Government policy, or have agreed approaches to BNG. Further information around general duties is available [here](#).

Remember to refer to the relevant sector specific information within National Policy Statements [here](#) and our own sector specific guidance on the SD Toolkit.

5. International and European sites

European site conservation objectives are available at <http://publications.naturalengland.org.uk/category/6490068894089216>.

Evidence Plans are a useful mechanism NSIP applicants can use to agree what information should be provided to the Planning Inspectorate and Natural England when undertaking Habitats Regulations Assessment (HRA). Agreeing the evidence-needs of the project early prior to applying for Development Consent will help reduce delays in the process. More information on Evidence Plans is available [here](#).

You should also consider where applicable our advice on the environmental considerations and use of data and evidence to support offshore wind and cable projects in English waters – see: [Environmental considerations for offshore wind and cable projects - Home \(sharepoint.com\)](#). This includes Natural England and Joint Nature Conservation Committee (JNCC)'s shared advice on 'Nature conservation considerations and environmental best practice for subsea cables in English inshore and UK offshore waters'. The outputs of Natural England's project 'Offshore Wind Marine Environmental Assessments: Best Practice Advice for Evidence and Data Standards' are also provided.

Natural England's Impact Risk Zones incorporate internationally designated sites and features and can be used to help identify the potential for the development to impact on a European Site. The dataset and user guidance can be accessed from the [Natural England Open Data Geoportal](#).

You can access this information through [NE Maps](#).

The development site is within or may impact on the following **European/internationally designated nature conservation site(s)**:

- North Pennine Moors Special Protection Area (SPA)
- North Pennine Moors Special Area of Conservation (SAC)
- North Pennine Dales Meadows SAC

The ES should thoroughly assess the potential for the proposal to affect internationally designated sites of nature conservation importance / European sites, including marine sites where relevant. This includes Special Protection Areas, Special Areas of Conservation, listed Ramsar sites, candidate SAC and proposed SPA.

Article 6 (3) of the Habitats Directive requires an appropriate assessment where a plan or project is likely to have a significant effect upon a European Site, either individually or in combination with other plans or projects.

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites	
Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
North Pennine Moors SPA European Site Conservation Objectives for North	Potential Impacts to Functionally Linked Land (FLL) Bird species associated with the North Pennine Moors SPA also rely on areas of land outside of the designated site boundary. These sites provide important supporting feeding and roosting habitats. They are often referred to as areas of functionally linked land (FLL). This land is important to the

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites

Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
Pennine Moors SPA - UK9006272	continuing survival, reproduction and viability of populations of SPA bird species, and proposals affecting this habitat may therefore have the potential to undermine the European site conservation objectives. <u>Temporary and permanent loss of FLL</u> The Proposed Development has potential to result in both temporary and permanent loss of habitats identified as FLL supporting qualifying SPA bird species. This includes permanent loss associated with Turbines, substation infrastructure, borrow pit excavation and access tracks, and temporary loss or permanent habitat damage associated with all construction activities and infrastructure cabling across the Order Limits. In addition, disturbance and displacement effects may reduce the suitability of FLL for key ecological functions and lead to additional loss of supporting habitat. Permanent loss of SPA supporting habitat from all infrastructure and construction activities should be assessed. Details of the full extent, nature and location of proposed works should be provided and the full amount of SPA supporting habitat loss associated with the proposal should be calculated. This should include the footprint of proposed infrastructure and any habitat removal/excavations required for proposed works, such as the onsite 'borrow pits.' Natural England advise that it will be important to present a project-wide assessment for impacts to functionally linked land. This should consider the potential for cumulative habitat losses (including areas supporting below 1% of the SPA population) alongside changes in habitat suitability and food availability, and disturbance effects. The assessment of changes to habitat suitability should include potential impacts of introducing additional drainage on areas of FLL, leading to drying and potential reduced usage by SPA birds. Temporary loss and damage of SPA habitats should also be assessed, for example from temporary siting of construction materials or cable installation. <u>Displacement</u> We welcome that a species-specific displacement assessment will be carried out and Natural England advise that the Breeding Bird Surveys, and habitat surveys should be used to

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites

Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
	inform the assessment of bird displacement from the proposed wind turbines. Natural England advises that displacing birds on a continuing basis from areas of suitable habitat which support SPA birds for necessary stages of their breeding cycle (courtship, nesting, feeding) equates to effective loss of functionally linked land, as such habitat is no longer available. Therefore, we advise that further assessment should be carried out within a 600 m buffer distance of the turbines to determine the predicted level and effects of displacement. The assessment should be informed by site-specific factors such as the habitats available, extent and type of bird usage within the buffer zone, relative importance of the area and existing pressures on the species present. The ecological functioning of the supporting habitats within proximity to the turbines will be a key consideration in the assessment. <u>Noise and visual disturbance</u> Disturbance effects on FLL should be assessed, including those arising from construction, operation, and decommissioning activities. Sources of disturbance may include noise, vibration, artificial lighting, turbine movement, and disruption of open vistas, which may lead to displacement or reduced use of these areas by SPA bird species. During construction, particular consideration should be given to disturbance arising from plant, machinery, excavation (e.g. borrow pits), vehicular movement along access tracks, lighting, and the presence of personnel. Operational effects should also be assessed, particularly those associated with turbine operation (including blade movement), maintenance activities, and substation infrastructure, including operational noise, lighting (including additional lights on top of the turbines), and ongoing site access. We note that impacts from lighting have been scoped out, however this cannot be ruled out at this stage without further detail and assessment of potential impacts and how lighting will be designed and managed. The assessment should determine the extent of both noise and visual disturbance. The combined effects of visual

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites

Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
	disturbance (e.g. turbine movement, machinery, personnel) and elevated noise levels should be considered, as these may increase the risk of disturbance. Natural England advise that an assessment is made for both construction and operational noise against the existing noise environment using a range of noise measurements – e.g. LAeq/ LAm_{ax}. The noise assessment should present the predicted noise at the sensitive receptor (i.e. the location of SPA birds) and set this in the context of the existing noise environment – i.e. how noise levels will change, including the type of noise such as consistent or sudden loud bangs etc. Factors such as noise ‘peakiness’, including rise time of a noise signal and the frequency content of the noise source, should also be included as these factors may affect behaviour. To understand peak noise levels and the repetition rate of peak noises over a period of time, we suggest LAm_{ax} and/or LApeak levels are assessed, in addition to LAeq. This will help to understand both average and maximum levels, as each can affect behaviour. A noise contour map should be provided to compare the location of noise contours matching thresholds of concern against the mapped distribution of birds. Where significant effects are identified, suitable mitigation measures should be developed. <u>Mortality from collision with turbines or ancillary infrastructure</u> The Proposed Development has the potential to increase mortality risk for SPA bird species through collision with turbine blades. We note that collision mortality risks ‘will be assessed for species identified as being potentially vulnerable to turbine collision’. The assessment should ensure that all relevant SPA qualifying species are considered, based on survey data and known ecological characteristics. We welcome that the NatureScot guidance on collision risk model and avoidance will be used.

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites

Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
	<u>Disruption to flight lines</u> Potential impacts on bird flightlines (i.e. barrier effect) and associated increased energy expenditure by birds for commuting flights between roosting and foraging areas should be assessed. Disruption to flightlines resulting from avoidance action should be assessed, informed by the VP surveys and predicted avoidance levels from the collision risk modelling. Bird survey methodology Natural England welcomes the ongoing bird surveys; however, further detail is required on the survey methodology to enable a full assessment of adequacy. This should include survey timings, frequency, coverage and methods. Natural England will provide further advice once this information is made available. In addition to breeding and non- breeding bird surveys, it is recommended that at least one full year of spring and autumn passage surveys is undertaken, in accordance with relevant guidance, to ensure that seasonal bird movements are appropriately characterised. Survey coverage should extend beyond the turbine locations to include the full Draft Order Limits, including potential cable corridor, access tracks, and all associated infrastructure. This is necessary to ensure that bird use of the wider site is adequately understood. We note that the area covered by vantage point 4 will only include one year of surveys. An assessment should be provided to demonstrate whether this offers sufficient coverage. Survey results should be used to inform the iterative design of the scheme, including the siting of turbines and associated infrastructure, and to identify and develop appropriate mitigation measures where necessary. The detailed bird survey results should be presented in full, with clear acknowledgement of any methodological limitations or gaps. We recommend that all survey data are collated into a single, coherent evidence base and presented spatially across the full DCO boundary, supported by mapping, to enable a comprehensive understanding of bird distribution and habitat

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites

Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
	use. Natural England will provide further advice once full survey results and detailed methodological information have been provided. We would encourage DAS engagement on the survey results and scheme design prior to production of the ES.
North Pennine Moors SAC European Site Conservation Objectives for North Pennine Moors SAC - UK0030033	<u>Habitat Damage or Loss through Indirect Peat Impacts</u> We note the proposal is located within 10km of the North Pennine Moors SAC. While the application will not be sited directly within a designated site, the wider impacts of damage to or loss of peat within the application boundary should be considered within the HRA. The assessment should consider the potential for hydrological connectivity between the application site, and the habitats within the designated site which could be impacted by changes to water supply or water quality. An appropriate hydrological unit should be identified as part of the assessment using evidence which demonstrates there will not be dewatering of the wider habitat. Please see the advice on peat below for further information on the requirements of the assessment (Peatlands). Paragraph 2.5.42 of the scoping report has identified there may be a requirement for supply of water if concrete will be batched on site in the final project design. It is currently not clear whether this water supply will be directly abstracted as part of the application process, or tankered in. If it is determined that water abstraction will be required as part of the application, then potential for changes to hydrology of designated sites should be assessed where there is hydrological connectivity between the abstraction location and the designated site. Paragraph 2.6.1 of the scoping report identifies there will be construction of barrow pits as part of the application. The hydrology of the borrow pits needs to be fully understood to determine whether they would be suitable receptor sites for excavated peat. Otherwise, the peat could be placed into a hole which is unable to retain water leading to loss of the peat, which may have impacts to designated sites in proximity to the proposed development. Measures should also be put in place around each borrow pit to prevent them from dewatering the surrounding peat.
North Pennine Dales Meadows SAC	We note that only one SAC within the 10km scoping boundary has been identified. However, North Pennine Dales Meadows SAC also occurs within your screening distance. The assessment should be updated to include consideration of

Table 2: Potential risk to international designated sites: the development is within or may impact on the following sites	
Site name with link to conservation objective	Potential impact pathways where further information/assessment is required
European Site Conservation Objectives for North Pennine Dales Meadows SAC - UK0014775	this SAC, with particular regard to the potential for hydrological connectivity between the application site and the habitats within the designated site, including whether the proposed development could affect water supply or water quality (such as through abstraction).
All internationally designated sites which may be located within 200m of site access routes.	Natural England advises that the potential for air quality impacts arising from this development needs to be assessed. Natural England refers the decision maker and Applicant to the Standard Advice in Annex B. This standard advice is Natural England's formal statutory advice and is a material consideration. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts. An overall conclusion regarding impacts on statutory protected sites must take into account the standard advice for air pollution. This will be for the decision maker to determine.

6. Nationally designated sites

Sites of Special Scientific Interest

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 (as amended). Further information on the SSSI and its special interest features can be found at www.magic.gov.uk.

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geportal](#).

The development site is within or may impact on the following **Site of Special Scientific Interest**:

- Lovely Seat – Stainton Moor SSSI
- Arkengarthdale, Gunnerside and Reeth Moors SSSI
- Bowes Moor SSSI
- Shaw Beck Gill SSSI
- Brignall Banks SSSI
- Arkle Beck Meadows, Whaw SSSI
- Fothering Holme SSSI
- All SSSIs with ornithological interest features within 20km of the proposed Order

Limits

There are inconsistencies between chapters of the Scoping Report in relation to the screening distances applied to designated sites, with different approaches taken to SSSI inclusion. While the screening distances are acceptable, it creates a lack of clarity as to which SSSIs are being scoped into the assessment. A consolidated list of all SSSIs considered within the study area should be provided to ensure clarity in the scope of the assessment.

The ES should include a full assessment of the direct and indirect effects of the development on the features of special interest within **these SSSIs** and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. We have focused our comments on the designated sites for where we anticipate the potential for impacts at this stage.

Table 3: Potential risks to nationally designated sites: the development is within or may impact on the following sites	
Site name with link to citation	Potential impact pathways where further information/assessment is required
Lovely Seat - Stainton Moor SSSI Citation Arkengarthdale, Gunnerside and Reeth Moors SSSI Citation Bowes Moor SSSI Citation	The application is in proximity to Lovely Seat - Stainton Moor SSSI, Arkengarthdale, Gunnerside and Reeth Moors SSSI and Bowes Moor SSSI, which partially underpin the North Pennine Moors SPA and SAC. We advise impacts should be considered in line with the advice given in table 2 for the European sites. For notified habitats or species which do not also form part of the SAC designation, a SSSI impact assessment should also be completed as part of the ES.
Arkle Beck Meadows, Whaw SSSI Citation Fothering Holme SSSI Citation	The application is in proximity to Arkle Beck Meadows, Whaw SSSI and Fothering Holme SSSI which partially underpin the North Pennine Dales Meadows SAC. We advise impacts should be considered in line with the advice given in table 2 for the SAC. For notified habitats or species which do not also form part of the SAC designation, a SSSI impact assessment should also be completed as part of the ES.
Shaw Beck Gill SSSI Citation	It is noted that the Scoping Report proposes to scope out Shaw Beck Gill SSSI from further consideration on the basis that it is a geological site; however, Natural England advise that it should be considered further as it triggers the IRZ and may be sensitive to impacts on active geomorphological processes, including changes to drainage patterns.
All SSSI's with ornithological interest within 20km (identified)	Natural England welcomes the 20km screening distance applied to designated sites with ornithological interest features. Impacts which may occur to supporting habitat used by SSSI birds outside the designated site boundary, as a result of the application, should be assessed.

Table 3: Potential risks to nationally designated sites: the development is within or may impact on the following sites	
Site name with link to citation	Potential impact pathways where further information/assessment is required
within Table 8-3)	
Brignall Banks SSSI Citation	The scoping identifies that headwaters of some tributaries of Gill Beck are within the site works area (9.3.29), we advise this is 'priority headwater habitat' for Brignall Banks SSSI. Therefore, water quality mitigation measures which are controlled via a Construction Environmental Management Plan (CEMP), as outlined in paragraphs 2.6.6 to 2.6.9, should be implemented to prevent water pollution impacts to the SSSI during the construction phase of the development. We will review the outline CEMP to be submitted as part of the DCO application. We also draw attention to the out-of-date ecological assessment of the Gill Beck WFD waterbody stated in table 9-2. The 2019 classification of 'poor' ecological status is used, when the 2022 classification is 'moderate', which raises the receptor sensitivity from very low to low. Additionally, it is only the fish element that is 'moderate' and this drives the overall classification; the other biological elements being 'good' (invertebrates) or 'high' (phytoplankton i.e. diatoms), and all physico-chemical elements being uniformly 'high'.
All nationally designated sites which may be located within 200m of site access routes.	Natural England advises that the potential for air quality impacts arising from this development needs to be assessed. Natural England refers the decision maker and Applicant to the Standard Advice in Annex B. This standard advice is Natural England's formal statutory advice and is a material consideration. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts. An overall conclusion regarding impacts on statutory protected sites must take into account the standard advice for air pollution. This will be for the decision maker to determine.

7. Regionally and Locally Important Sites

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local sites are identified by the local Wildlife Trust, geoconservation group or other local group. The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. They may also provide opportunities for delivering beneficial environmental outcomes.

8. Protected species

The conservation of species protected under the Wildlife and Countryside Act 1981 and the

Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System](#).

Applicants should check to see if a mitigation licence is required using Natural England guidance on licensing [Natural England wildlife licences](#). Applicants can also make use of Natural England's charged service [Pre Submission Screening Service](#) for a review of a draft wildlife licence application. Natural England then reviews a full draft licence application to issue a Letter of No Impediment (LONI) which explains that based on the information reviewed to date, that it sees no impediment to a licence being granted in the future should the DCO be issued. This is done to give the Planning Inspectorate confidence to make a recommendation to the relevant Secretary of State in granting a DCO. See [Advice Note Eleven, Annex C – Natural England and the Planning Inspectorate | National Infrastructure Planning](#) for details of the LONI process.

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England has adopted [standing advice](#) for protected species, which includes guidance on survey and mitigation measures. A separate protected species licence from Natural England or Defra may also be required.

9. District Level Licensing for great crested newts

Where strategic approaches such as DLL for GCN are used, a Letter of No Impediment (LONI) will not be required. Instead, the developer will need to provide evidence to the Examining Authority (ExA) on how and where this approach has been used in relation to the proposal, which must include a counter-signed Impact Assessment and Conservation Payment Certificate (IACPC) from Natural England, or a similar approval from an alternative DLL provider.

The DLL approach is underpinned by a strategic area assessment which includes the identification of risk zones, strategic opportunity area maps and a mechanism to ensure adequate compensation is provided regardless of the level of impact. In addition, Natural England (or an alternative DLL provider) will undertake an impact assessment, the outcome of which will be documented in the IACPC (or equivalent).

If no GCN surveys have been undertaken, Natural England's risk zone modelling may be relied upon. During the impact assessment, Natural England will inform the applicant whether their scheme is within one of the amber risk zones and therefore whether the Proposed Development is likely to have a significant effect on GCN.

The IACPC will also provide additional detail including information on the Proposed Development's impact on GCN and the appropriate compensation required.

By demonstrating that the [DLL scheme for GCN](#) will be used, consideration of GCN in the ES can be restricted to cross-referring to the Natural England (or alternative provider) IACPC as a justification as to why significant effects on GCN populations as a result of the Proposed Development would be avoided.

10. Priority Habitats and Species

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).

An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The ES should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

11. Ancient Woodland, ancient and veteran trees

The ES should assess the impacts of the proposal on the ancient woodland and any ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, its history, and the contribution it makes to our diverse landscapes. Paragraph 186 of the National Planning Policy Framework (NPPF) sets out the highest level of protection for irreplaceable habitats and development should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

Natural England maintains the [Ancient Woodland Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

Natural England and the Forestry Commission have prepared [standing advice](#) on ancient woodland, ancient and veteran trees.

12. Biodiversity net gain

We welcome the commitment to delivering Biodiversity Net Gain (BNG) on this project. BNG will become mandatory for NSIPs in November 2026. The Environment Act 2021 includes NSIPs in the requirement for BNG, with the biodiversity gain objective for NSIPs defined as at least a 10% increase in the pre-development biodiversity value of the on-site habitat. The new Biodiversity Gain Statement sets out how energy NSIPs must calculate, deliver and report on BNG2. Further upcoming guidance on delivering BNG for NSIPs should also be adhered to.

Early engagement with Natural England on BNG proposals will help maximise outcomes and reduce risks. It would also be beneficial to align BNG provision with the features of the designated site and the aims of the LNRS, and we advise consultation with the relevant LPAs on this matter should be considered.

13. Landscape

Context

The proposed development is in the setting of – and may potentially impact on – four Protected Landscapes:

- Yorkshire Dales National Park (approximately 0.65km to the nearest turbine);
- North Pennines National Landscape (approximately 2.3km to the nearest turbine)
- Nidderdale National Landscape (approximately 22km to the nearest turbine);
- North York Moors National Park (approximately 38km to the nearest turbine).

All of these Protected Landscapes are within the zone of theoretical visibility (ZTV) for the proposed development. Natural England is particularly concerned about potential impacts on the Yorkshire Dales National Park and North Pennines National Landscape due to their close proximity. For example, the site of the proposed development shares the same landscape character as the nearest sections of these Protected Landscapes. Whilst the potential impacts on Nidderdale National Landscape and North York Moors National Park are likely to be less significant, we do consider that they should not be scoped out at this stage of the process, as outlined in more detail in response to the consultation questions, below.

Part of the Lake District National Park is within the 45km study area. However, as there is not likely to be any intervisibility with the proposed development, we acknowledge that this National Park can be scoped out of the assessment.

Consultation questions on Chapter 5 (Landscape and Visual)

Q6.1: Do consultees have any comments on the proposed approach and methodology?
Hope Moor Wind Farm – EIA Scoping Report Landscape and Visual

Paragraph 5.4.2 refers to the 'Guidelines for Landscape and Visual Impact Assessment' and other sources of guidance, which are listed in the section titles 'Relevant Policy, Legislation

and Relevant Guidance'. Natural England considers the list of legislation, policy and guidance to be incomplete. For example:

- National Policy should include:
 - Natural Environment Planning Practice Guidance² (with the section on Landscape³ being particularly relevant).
- Local Policy should include:
 - Nidderdale National Landscape Management Plan 2025-2030.⁴
 - North Pennines Area of Outstanding Natural Beauty Management Plan 2019-24⁵
 - Yorkshire Dales National Park Management Plan 2025-2030.⁶
 - North Yorks Moors National Park Management Plan 2022-2027.⁷
- Guidance should include:
 - North Pennines AONB Planning Guidelines.⁸
 - Defra's 'Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes'.⁹
 - The National Landscape Association's 'Guidance for relevant authorities on the Protected Landscapes duty (CRoW Act 2000).¹⁰

A particularly important consideration, with regards to legislation, is the statutory duty on relevant authorities to seek to further the purposes of Protected Landscapes. In this instance, this would include Yorkshire Dales National Park, North Pennines National Landscape, Nidderdale National Landscape and North York Moors National Park.

As stated in National Policy Statement EN-1 (paragraph 5.10.8) this duty '*applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. In these locations, projects should be designed sensitively given the various siting, operations and other relevant constraints*'. This policy wording is also reflected in Defra's guidance on the 'seek to further' duty, which explicitly addresses the issue of development in the setting of Protected Landscapes.

It is not clear, from the Scoping Report, whether the applicant is a relevant authority in this regard. The applicant should make it clear whether they are a relevant authority or not. However, even if the applicant is not a relevant authority, the Planning Inspectorate and the Secretary of State are relevant authorities. As such, they will have to fulfil this statutory duty when providing their recommendations on the proposed development and when making their decision on the proposed development, respectively. On this basis, it would be in the applicant's best interest to demonstrate how they have sought to further the purposes of designation for these Protected Landscapes.

² <https://www.gov.uk/guidance/natural-environment>

³ <https://www.gov.uk/guidance/natural-environment#landscape>

⁴ Nidderdale National Landscape Joint Advisory Committee (2025) *Nidderdale National Landscape: An Area of Outstanding Natural Beauty. Management Plan 2025 to 2030* ([link](#)).

⁵ North Pennines AONB Partnership (2019) *North Pennines Area of Outstanding Natural Beauty Management Plan 2019-2024* ([link](#)).

⁶ Yorkshire Dales National Park Management Plan Partnership (2025) *Yorkshire Dales National Park Management Plan 2025-2030* ([link](#))

⁷ North York Moors National Park Authority (2022) *North York Moors National Park Management Plan 2022-2027* ([link](#)).

⁸ North Pennines AONB Partnership (2011) *North Pennines AONB Planning Guidelines* ([link](#)).

⁹ Department for Environment, Food & Rural Affairs (2024) *Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes* ([link](#)).

¹⁰ National Landscapes Association (2025) *Applying the CRoW Act section 85 duty to 'seek to further the purpose' in National Landscapes (AONBs) – Guidance for relevant authorities* ([link](#)).

The above points should also be explicitly addressed in relation to Chapter 4 of the Scoping Report.

Section 5.4.2 refers to seascape character typology. Given the inland location of the proposed development, seascape character typology is, presumably, not a relevant consideration in this instance.

Section 5.4.5 refers to effects on National Scenic Areas (NSAs). NSAs are a Scottish designation and, as such, are, presumably, not relevant in this instance. A more appropriate reference point would be the affected National Parks (i.e. Yorkshire Dales and North York Moors) and the affected National Landscapes (i.e. North Pennines and Nidderdale). The 'special qualities' of these Protected Landscapes will be a key consideration. However, these special qualities should be considered alongside the key features / characteristics of National Character Areas (NCAs) and landscape character types / areas that overlap with these Protected Landscapes.

Section 5.4.5 refers to cumulative effects. It states that cumulative effects arise where the Study Areas for two or more developments overlap. However, the NatureScot guidance on cumulative effects states that '*sequential impacts may need to be assessed for a distance of more than 60km from the proposed wind farm*'. With regards to sequential visual assessment and the selection of routes for analysis, the NatureScot guidance states that the assessed routes '*may extend beyond this [60km search area] in some situations, for example, particularly important or busy travel routes, or particularly sensitive locations*'.¹¹

As such, it may be appropriate to consider cumulative effects beyond the 45km study area, to a distance of 60km or more (i.e. two developments could be 120km, or more, apart).

This would be particularly relevant for visual receptors (i.e. people) on the Pennine Way National Trail. This is because the Hope Moor Wind Farm proposal, in combination with the Calderdale Energy Park proposal, in West Yorkshire, and the Ray II Wind Farm proposal, in Northumberland, would result in large scale wind farms (i.e. wind farms with multiple turbines that have a turbine tip height of 200m) being visible, intermittently, along almost the entire length of the Pennine Way. It may also be relevant for the Coast to Coast Path National Trail.

Section 5.4.6 refers to the sensitivity of the view. It should refer to the sensitivity of the visual receptor rather than the sensitivity of the view.

Section 5.4.6 states that the degree of effects in the LVIA will be assessed as negligible, minor, moderate-minor, moderate, moderate-major or major. Natural England agrees with using these six degrees of effect (rather than just using four degrees of negligible, minor, moderate and major). We recommend that six categories should also be applied for sensitivity and magnitude of change (unlike Table 3-1, which only applies three categories). This would facilitate a more nuanced assessment.

However, the assessment should not overly rely on a matrices-based assessment of significance and matrices should not dictate judgements. Any matrices-based assessment of significance should be accompanied by a robust narrative to justify the conclusions that have been reached. This is particularly important where the assessment identifies moderate levels of effect, which could be classed as significant or not significant, depending on the assessor's professional judgement.

¹¹ <https://www.nature.scot/doc/guidance-assessing-cumulative-landscape-and-visual-impact-onshore-wind-energy-developments>

Section 5.4.9 states that ‘a precautionary approach will generally be adopted which assumes that significant landscape and visual effects will be weighed on the negative side of the planning balance’. The LVIA should focus on the significance of landscape and visual effects and should not stray into providing opinions on the overall planning balance.

Q6.2: Do consultees agree with the proposed 45km LVIA Study Area?

In principle, Natural England agrees with the proposed 45km LVIA Study Area as this reflects the thresholds that are recommended in relevant guidance. However, as outlined in response to Q6.1, it may be appropriate to consider a 60km (or larger) area of search in relation to sequential effects, in line with NatureScot guidance.

Q6.3: Do consultees agree that the assessment of the effects on landscape character receptors (except landscape planning designations) should focus on areas within a 20 km radius of the proposed wind turbines?

No, Natural England does not agree that the assessment of the effects on landscape character receptors should focus on areas within a 20km radius of the proposed wind turbines.

The question indicates that this 20km radius would not apply for ‘landscape planning designations’. However, this distinction is not made in the text of the Scoping Report.

We recommend that the full 45km study area should be applied when assessing the effects on landscape character receptors, particularly where these receptors overlap with the National Parks and National Landscapes within the study area. This should include any relevant National Character Areas and landscape character types / areas, particularly those within the zone of theoretical visibility.

Q6.4: Do consultees agree with the proposal to scope out the Landscape Planning Designations where no further assessment is proposed for the LVIA, as set out in Table 5-2?

No, Natural England does not agree with the proposal to scope out the Landscape Planning Designations where no further assessment is proposed for the LVIA, as set out in Table 5-2.

In particular, we recommend that Nidderdale National Landscape (which is 22km from the nearest turbine) and North York Moors National Park (which is 38km from the nearest turbine) should be included in the detailed assessment within the LVIA. Both of these Protected Landscapes are within the zone of theoretical visibility (ZTV), with 21-23 turbines being theoretically visible in these locations. Although the North York Moors National Park is further away, much of the area within this National Park that overlaps with the ZTV also includes the Cleveland Way National Trail. Their very high sensitivity, combined with a magnitude of change that is more than negligible, could still result in the significance of effect being at least ‘moderate’.

We acknowledge that there is no theoretical visibility, within the Study Area, in relation to the Lake District National Park. As such, we acknowledge that the Lake District National Park can be scoped out from further assessment.

Q6.5: Do consultees have any comments or suggestions in relation to the Preliminary Representative Viewpoint Locations shown in Table 5-3 and illustrated on Figures 5.2 - 5.5?

Natural England recommends the following additions to the Preliminary Representative Viewpoint Locations:

- Public rights of way (and or access land locations) on site – this should include consideration of how the proposed development would affect views looking westwards towards the Yorkshire Dales National Park (including views looking towards Peat Moor Hill).
- Great Shunner Fell: approximately 20km south-west of Hope Moor; it is located on the Pennine Way National Trail so including this viewpoint will help to assess the sequential impacts for users of the Pennine Way.
- Pen-y-Ghent: approximately 38km south-west of Hope Moor; it is located on the Pennine Way National Trail so including this viewpoint will help to assess the sequential impacts for users of the Pennine Way; Pen-y-Ghent is also within the ZTV for the Calderdale Energy Park proposal.
- More viewpoints within the North Pennines National Landscape (to be discussed / agreed).
- At least one viewpoint within North York Moors National Park, potentially on the Cleveland Way National Trail and / or on the Coast to Coast Path National Trail (to be discussed / agreed).
- At least one viewpoint in the Nidderdale National Landscape (to be discussed / agreed).
- More viewpoints along the Coast to Coast Path National Trail, including between the Yorkshire Dales National Park and the North York Moors National Park.

Natural England also considers that four viewpoints is potentially insufficient to assess night-time visual impacts, including impacts relating to aviation lighting. For example, the viewpoints that are proposed for this assessment (Viewpoints 1, 4, 6, and 18) are all within 10km of the site, whereas the Scoping Report itself acknowledges that a study area of 20km (i.e. a radius of 20km) is appropriate, in line with NatureScot guidance. As such, it may be appropriate to select additional viewpoints that are between 10km and 20km from the site.

Q6.6: Do consultees have any further comments or suggestions relating to the cumulative assessment or the preliminary cumulative sites shown on Figure 5.11?

As outlined in response to Q6.1, Natural England recommends that a study area of 60km (i.e. a 60km radius), or larger, should be used for assessing sequential effects, in line with NatureScot guidance. In particular, we consider that it would be appropriate to include Calderdale Energy Park and Ray II Wind Farm in the assessment, in relation to sequential effects for users of the Pennine Way National Trail.

Additional landscape comments

Landscape character within and adjoining the Protected Landscapes

Consideration should be given to the extent to which the landscape character of land within and adjoining the Yorkshire Dales National Park and North Pennines National Landscape is complementary, particularly with regards to the landscape character of the area within which the proposed development would be located. The extent to which the complementary nature of the landscape character would be affected by the proposed development should also be assessed.

This issue is particularly significant given that the mapping for the North Yorkshire and York Landscape Characterisation Project shows that the area on which the proposed development would be located and the nearest sections of the Yorkshire Dales National Park and North Pennines National Landscape all form part of Landscape Character Type 33

(Gritstone High Plateau).¹² In other words, these areas all have the same landscape character.

National Character Areas

Paragraph 5.6.8 of the Scoping Report states that the site sits across three National Character Areas – NCA 10 North Pennines, NCA 21 Yorkshire Dales and NCA 22 Pennine Dales Fringe. These NCAs are also important considerations in relation to potential impacts on the North Pennines National Landscape, the Yorkshire Dales National Park and Nidderdale National Landscape respectively and should be explicitly addressed in this regard.

The Scoping Report also refers to NCA 23 Tees Lowlands and NCA 24 Vale of Mowbray and infers that impacts relating to these NCAs is likely to be limited. However, consideration should be given to the fact that the Coast to Coast Path National Trail runs through NCA 24. Visual receptors on this National Trail are likely to have relatively high sensitivity which means that the significance of any visual effects are also likely to be relatively high.

As outlined above, we recommend that North York Moors National Park should be included in the LVIA. As such, we recommend that NCA 25 North York Moors and Cleveland Hills should also be included in the LVIA.

Landscape Character Assessments

Paragraph 5.6.10 of the Scoping Report refers to local Landscape Character Areas. In this regard, the Scoping Report explicitly refers to The County Durham Landscape Character Assessment and the North Yorkshire and York Landscape Characterisation Project. We acknowledge that these are appropriate reference points. However, there are also landscape character assessments for the former local authority areas that have been subsumed into North Yorkshire Council, which may be of relevance. These include:

- **Craven District Council** - <https://edemocracy.northyorks.gov.uk/Data/Craven%20-%20Craven%20Spatial%20Planning%20Sub-Committee/20171127/Agenda/Item%206%20App%20A%20Landscape%20Impact.pdf>
- **Hambleton District Council** available at: [Hambleton-Landscape Character Assessment and Sensitivity Study May 2016-compressed.pdf](#)
- **Harrogate Borough Council** [Landscape character assessment | North Yorkshire Council](#) (includes Nidderdale NL)
- **Richmondshire District Council** [Landscape Character Assessment Vol. 1 - DocsLib](#)
- **Ryedale District Council** – link broken. Contact North Yorkshire Council to see if Ryedale 'Landscape character assessment - landscapes of Northern Ryedale, 1999' still part of their evidence base.

We recommend that the LVIA consultants should contact North Yorkshire Council to establish which components of this landscape character evidence base are still relevant and would merit inclusion in the LVIA.

We recommend that the Yorkshire Dales Landscape Character Assessment should also be explicitly addressed in the LVIA.

¹² [Maps showing relationship of LCA to National Park AONB District assessments](#)

As outlined above, we recommend that North Yorks Moors National Park should be included in the assessment. As such, we recommend that the North York Moors National Park Landscape Character Assessment should also be explicitly addressed in the LVIA.

In many instances, the landscape character types / areas identified in the National Park Landscape Character Assessments will align with the landscape character types / areas in the North Yorkshire and York Landscape Characterisations Project. Where this is the case, reference should be made to the names that are used in both document but the assessment would only need to address the one set of key features / characteristics for that particular landscape character type / areas.

In addition to the landscape character assessments themselves, explicit consideration should also be given to related strategies and guidelines, such as those provided on the Durham Landscape website.¹³ This should include an assessment of whether the proposed development complies with these strategies and guidelines.

Consultation

Paragraph 5.4.14 of the Scoping Report refers to the consultation that will be undertaken regarding the scope and approach of the LVIA. It identifies that the key consultees include Natural England, Yorkshire Dales National Park, North York Moors National Park, Durham County Council and North Yorkshire Council.

Natural England is pleased to be included in this list of key consultees and we look forward to engaging in future discussions on this topic. We also support the inclusion of the two National Park Authorities and the two Councils as key consultees. However, we recommend that the North Pennines National Landscape team and the Nidderdale National Landscapes team should also be consulted.

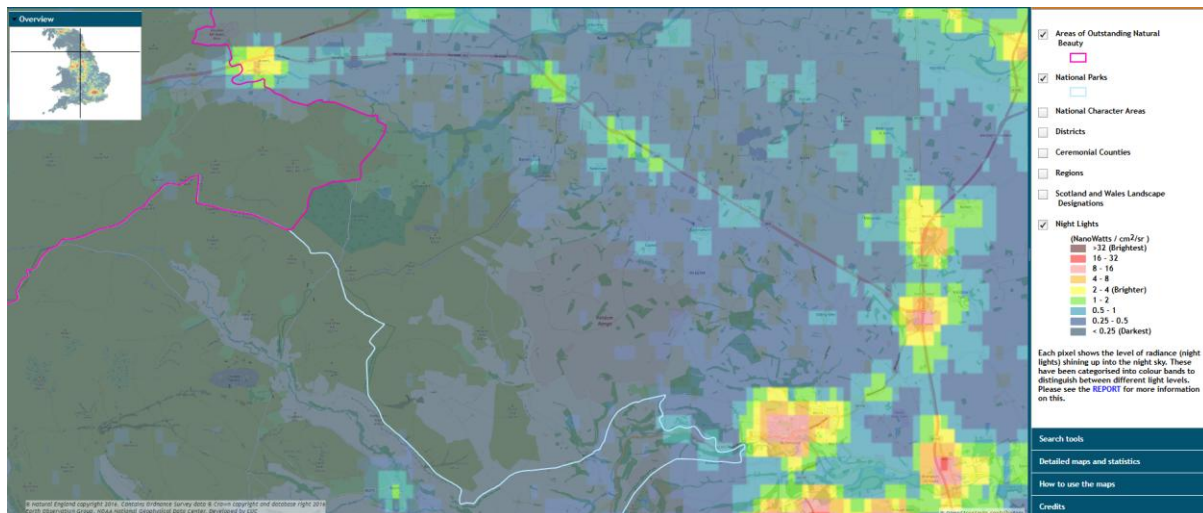
Dark Skies

In addition to addressing the visual impacts of lighting associated with the proposed development, the LVIA should also address the impacts of the proposed development on the dark skies of the area as a landscape receptor.

The extract from CPRE's Light Pollution and Dark Skies Map¹⁴ shows that the area of the proposed development currently has very dark skies. The LVIA should assess the extent to which the quality of these dark skies would be affected and the significance of these effects.

¹³ <https://durhamlandscape.info>

¹⁴ <https://www.cpre.org.uk/light-pollution-dark-skies-map/>



Potential Effects Summary

As outlined above, in relation to Q6.4, Natural England considers that there is would be potential effects on Nidderdale National Landscape and North York Moors National Park, as well as on Yorkshire Dales National Park and North Pennines National Landscape.

Potential Impacts to be Scoped in / Scoped Out

As outlined above, in relation to Q6.3, above, Natural England does not agree with the application of a 20km threshold for assessment of effects on landscape character.

As outlined above, in relation to Q6.4, above, Natural England does not agree with North Yorkshire Moors National Park and Nidderdale National Park being scoped out of the LVIA, particularly with regards to the operational phase of the proposed development.

Natural England questions the appropriateness of scoping out the cumulative effects that may arise as a result of cumulative wind farm development below 50m, especially given that NatureScot guidance indicates that the zone of theoretical visibility (ZTV) study area for wind farms of that scale should extend to 15km from the nearest turbines.

Comments on other chapters that relate to landscape issues

Access, Traffic and Transport (Chapter 11)

Figure 11.1 of the Scoping Report shows that several public rights of way (PROW) cross the site of the proposed development or run along its boundary.

Ideally, in line with best practice, the turbines should be located at least 'turbine tip height + 10%' from these PROW.¹⁵ This is primarily from a safety perspective (i.e. if the turbine was to topple over). However, it would also help to reduce the visual impact of the turbines and reduce noise levels associated with the turbines. In turn, this would also help to reduce adverse effects relating to landscape character (e.g. impacts on tranquillity).

This issue should be explicitly addressed in the Environmental Impact Assessment (EIA).

Noise (Chapter 12)

¹⁵ Relevant best practiced includes the 'Assessment of Areas of Suitability for Wind Development in Calderdale' ([link](#) – page 10).

Noise associated with the proposed development could potentially have an adverse effect on the relative tranquillity of the Yorkshire Dales National Park in this locality.

The extent to which noise levels within the National Park would increase as a result of the proposed development should be explicitly addressed, as should the measures that are being taken to (i) avoid and (ii) mitigate noise impacts. Ideally, the proposed development should be designed in such a way that increased noise levels would not be experienced within the National Park. Noise levels at the parking area at Stang Gill and along public rights of way within the National Park should be a key consideration in this regard.

The Environmental Impact Assessment (EIA) should also explicitly address the extent to which noise levels on public rights of way (PROW), including roads, within – and adjacent to – the site would increase as a result of the proposed development. Ideally, the development should be designed in such a way that noise levels on these PROW would not increase by more than, say, 5dB.

Legislation and national and local policy relating to Protected Landscapes is a relevant consideration in this regard, particularly the ‘seek to further’ duty.

Shadow Flicker / Shadow Cast (Chapter 14)

The extent to which ‘shadow cast’, resulting from the proposed development, would extend into the Yorkshire Dales National Park (including on public rights of way) should be explicitly addressed in the Environmental Impact Assessment (EIA). This ‘shadow cast’ could adversely affect the natural beauty of the National Park, particularly in relation to its relative tranquillity. Ideally, the development should be designed in such a way that there would be no shadow cast within the National Park.

Legislation and national and local policy relating to Protected Landscapes is a relevant consideration in this regard, particularly the ‘seek to further’ duty.

Heritage landscapes

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at www.hmrc.gov.uk/heritage/lbsearch.htm.

Connecting people with nature

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 104 and there will be reference in the relevant National Policy Statement. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

14. Soils and agricultural land quality

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the

development on soils and best and most versatile (BMV) agricultural land should be considered. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

The following issues should be considered and, where appropriate, included as part of the ES:

- The degree to which soils would be disturbed or damaged as part of the development.
- The extent to which peat would be disturbed or damaged as part of the development.
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any BMV agricultural land would be impacted.

Peatlands

The Environmental Impact Assessment (EIA) should fully quantify the extent, nature, and distribution of habitat affected by all elements of the proposal. The total permanent habitat loss arising from all infrastructure and construction activities must be clearly calculated and presented. This should include turbine bases, access tracks, cabling, borrow pits, laydown areas, and any excavation or habitat removal associated with construction. All relevant habitats should be included, including Annex I blanket bog (active and degraded) where present, as well as other peatland habitats such as wet heath and flushes. This approach applies both within and outwith SACs. Blanket bog importance should not be understated, and all Annex I blanket bog habitat should be treated as highly sensitive, irreplaceable, and of high conservation value regardless of designation status.

Peat depth must be surveyed at an appropriate resolution and presented using fine-scale categories such as 1–10 cm, 11–29 cm, and ≥30 cm. A proportion of depth measurements e.g. 10% must be confirmed via soil coring. These data must underpin habitat classification alongside National Vegetation Classification (NVC) and UK Habitat Classification (UKHab); with deep peat defined as ≥30 cm. Habitat classification must not rely solely on vegetation composition, as this can lead to misclassification of Annex I habitats. In particular, areas of peat deeper than 30cm should be classified as blanket bog habitat rather than heath or grassland. Incorrect classification can lead to systematic underestimation of Annex I habitat extent and associated impacts, particularly where peat depth data and vegetation mapping are not aligned.

Blanket bog should be defined in line with Natural England's [Definition of Favourable Conservation Status](#) for blanket bog, using a peat depth threshold of ≥30 cm. Most upland semi-natural vegetation occurring on peat deeper than this threshold should be classified as either active blanket bog or degraded (but restorable and still classed as Annex 1 H7130 definition) blanket bog, except where specific habitats such as flushes or fens are present. Degraded blanket bog should be treated as restorable habitat. The presence of peat-forming species, including Sphagnum, cotton grass and purple moor-grass, with heather *Calluna vulgaris* and other ericaceous species should be used to help identify active blanket bog. Degraded blanket bog should not be treated as low-value habitat, as it retains restoration potential and may recover function in the absence of damaging activities, particularly with restoration efforts.

The classification of blanket bog must clearly reflect that both active and degraded blanket bog fall within the Annex I habitat H7130. Blanket bog remains an Annex I habitat where it retains its characteristic form and vegetation and is capable of restoration, even where peat-forming processes are not currently active. The assessment must recognise active blanket

bog, Priority Annex I habitat (H7130*), can include degraded blanket bog, which despite being degraded, can also be defined as being active (the presence of peat-forming species) and should continue to be classified as Annex I habitat H7130*. Failure to do so risks under-representing the extent of Priority Annex I habitat within the study area.

Wet heath should also be identified in line with the [Definition of Favourable Conservation Status for Heathland - RP2977](#). It typically occurs on shallow peat or soils with impeded drainage. Care must be taken to distinguish wet heath from degraded blanket bog and from dry heath on mineral soils by considering both peat depth and vegetation composition.

Permanent loss of Annex I blanket bog outside designated sites must be robustly quantified. Lasting and irreparable loss of Annex I habitat is likely to represent a significant adverse effect outside designated sites. Assessments which rely on uncertain or unproven mitigation to offset such losses are likely to underestimate the true scale and significance of impacts.

Temporary loss and damage of habitats must be assessed separately. Examples of this include impacts arising from construction compounds, cable installation, and peat storage. For impacts to be considered temporary, they must be clearly time-limited and demonstrate recovery to pre-impact condition and ecological functionality within a defined timeframe. This assessment should consider both the duration of construction and the time required for full habitat recovery. Where recovery is uncertain or prolonged, impacts should be treated as effectively permanent. The key test is whether the effects are capable of being fully undone and the habitat restored to a comparable ecological state. A detailed remediation plan using proven, evidenced techniques must be provided where restoration is proposed.

Hydrological impacts must be assessed comprehensively and should not be limited to changes in the water table. The assessment must consider all relevant peatland processes, including but not limited to, changes to surface and subsurface flow pathways, peat compression and increased bulk density, drying of near-surface peat affecting peat formation, and long-term impacts such as shrinkage, subsidence, and instability. Oxidative peat loss due to increased oxygen penetration and progressive drying must also be considered. These effects are likely to extend beyond the immediate development footprint and must take into account wider hydrological connectivity. Hydrological effects, including drainage impacts, are a critical risk and can drive long-term degradation, carbon loss, and loss of peat-forming conditions across the wider peatland system.

Construction activities such as peat excavation and handling, borrow pit excavation, track construction, drainage installation, and temporary peat storage must be fully assessed. These activities have the potential to extend disturbance beyond the footprint of infrastructure, drive hydrological change, and result in erosion, drying, and long-term degradation of wider peatland systems. Construction-related disturbance is likely to expand beyond the immediate footprint through hydrological alteration, leading to erosion, drying, and long-term damage to peatland habitats.

Mitigation and restoration measures must be realistic, evidence-based, and appropriate to peatland environments. Restoration and peat reuse cannot replicate natural peatland function. Displaced peat typically becomes aerated and prone to oxidation and will not restore peat-forming processes. The use of excavated peat to “reinstate” other areas is therefore unlikely to be effective and may cause additional damage through loss of existing vegetation. Mitigation measures should not be relied upon to justify impacts on intact or active blanket bog. Mitigation approaches based on peat reuse or reinstatement are unevidenced and may result in permanent habitat loss or degradation rather than successful restoration.

Where the proposal affects an SAC, an Appropriate Assessment will be required and must demonstrate no adverse effect on site integrity. If permanent habitat loss or significant degradation occurs, this test is unlikely to be met. In such cases, the proposal could only proceed via derogation if there are no feasible alternatives, if there are imperative reasons of Annex I habitat should be treated as highly sensitive and effectively irreplaceable, with overriding public interest, and if adequate compensation can be secured.

extremely slow recovery times. Degraded bogs should be recognised as restoration opportunities rather than low-value land. Site management may already be shifting toward restoration and improved condition in response to policy and legislative drivers, meaning that habitat recovery can occur in the absence of development.

Advice on the Submitted Scoping Report

We provide the following specific advice on the information submitted at this stage for the topic of peat loss or damage.

- Table 7-2 – UKHab code f1a6 Degraded blanket bog falls under the category of 'blanket bog' as listed in The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 and is irreplaceable.
- Table 7-5 - 'cutting vegetation in all areas of suitable reptile habitat' may have impacts on the habitat by changing vegetation composition and structure. Vehicle use and cutting may also impact underlying soils. These impacts need to be considered.
- Table 9-5/9-6 hydrology - Should scope in potential adverse impacts to habitats, particularly wetland/peatland habitat types. Table 7-6 scopes in altered water tables and edge effects but all aspects of potential hydrological change should be considered.
- The hydrological impact of the aggregate borrow pits on the peat soil needs to be fully understood/mitigated.
- Table 10-1 Note that the England Peat Map should not be relied on at the site scale.
- 10.3.13 Peat soils under <0.3m in depth represent a significant carbon store. They frequently form part of a wider peat body and are important in the context of site hydrology, as well as hosting important habitats such as wet heath, so should be scoped in.
- The impact of the operational phase on the peat soil needs to be scoped in.
- Quadrat data is required to confirm NVC communities to avoid errors in expert judgement.

Best Most Versatile Land and Soils

A detailed Agricultural Land Classification (ALC) survey may be required if one is not already available. For information on the availability of existing ALC information see www.magic.gov.uk.

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g.

agricultural reinstatement, habitat creation, landscaping, allotments and public open space).

- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

We note that table 10-3 of the scoping report advises that a further desk-based assessment of agricultural land capability will be undertaken, however it is not currently stated whether this will be accompanied by ALC surveys, which will inform the Soil Management Plan. We strongly advise that if a non-standard approach to BMV soil surveys is proposed that early discussions are undertaken with Natural England to determine suitability.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

15. Air quality

Natural England advises that the potential for air quality impacts arising from this NSIP needs to be assessed. Natural England refers you to our standard advice on air quality impacts which can be found in Annex B. This standard advice is Natural England's formal statutory advice. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on proposals with potential air pollution impacts. An overall conclusion regarding impacts on statutory protected sites must take into account the standard advice for air pollution

16. Water quality

NSIPs can occur in areas where strategic solutions are being determined for water pollution issues and they may not have been factored into the local planning system as they are delivered through National Policy Statements.

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced. A number of water dependent protected nature conservation sites have been identified as failing condition due to elevated nutrient levels and nutrient neutrality is consequently required to enable development to proceed without causing further damage to these sites. The ES needs to take account of any strategic solutions for nutrient neutrality or Diffuse Water Pollution Plans, which may be being developed or implemented to mitigate and address the impacts of elevated nutrient levels.

17. Climate change

Natural England is committed to delivering more renewable energy in a sustainable manner which avoids adverse impacts on the natural environment and seeks to contribute to nature recovery, in line with the Environmental Improvement Plan target.

The ES should have regard to the requirements of the relevant [National Policy Statements for Energy Infrastructure](#) for climate resilience and nature recovery.

Carbon Impacts

Although carbon calculations are not directly within Natural England's statutory remit for NSIPs, the assessment is relevant to peat and hydrology impacts, and justification of the need for the development. Therefore, we have provided the below comments on that basis.

The protection and restoration of peatlands and their habitats helps reduce the carbon emissions preventing the release of its significant stores of carbon and in future enables carbon sequestration.

Natural England advises that environmental assessments should include detail on carbon impacts throughout the lifetime of the development, including carbon emissions and changes to carbon storage and sequestration over time, resulting from the loss of (or impacts to) semi-natural habitats and the associated peat carbon stores.

It may be helpful to refer to Natural England's guidance on Climate Mitigation and England Peatlands (NERR142)¹⁸ and Spatial Prioritisation of Land Management for Carbon Dataset 2023 (NECR510)¹⁹.

We note that the Scottish Carbon Calculator for wind farms is under review. Recent evidence reviews highlight issues with adopting this tool²⁰. In the absence of this tool, a suitable alternative approach to calculating carbon impacts should be applied.

Well established methods and tools are available to undertake Whole Life Carbon Assessments (e.g. PAS2080), including forthcoming offshore wind carbon footprinting guidance. However, additional analysis of the specific impacts of development on peatlands/habitat carbon emissions will be required.

The assessment should take account of cumulative and long-term effects, including ongoing and proposed drainage, other developments, and changing land management practices. These can contribute to the lowering of water tables, increased carbon loss, and wider peatland degradation. Carbon assessments must be based on robust assumptions, as reliance on optimistic restoration outcomes can lead to underestimation of impacts. Carbon assessments based on weak assumptions or optimistic restoration outcomes are likely to underestimate the true scale of emissions and long-term peat degradation.

Annex B - Standard Advice for Air Quality Impacts in National Significant Infrastructure Projects (NSIPs)

Natural England provides the following standard advice on air pollution. This advice relates to the protection of protected sites under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Wildlife and Countryside Act 1981 and should be taken as Natural England's formal representation. This standard advice is applicable to all stages of the NSIP process and may be used by the applicant for NSIP pre application stages, by the Examining Authority (ExA) during the statutory stages of the NSIP and by the relevant Secretary of State as the competent authority.

Protected sites are 'sites of special scientific interest' (SSSIs) and 'habitats sites' (also called 'European sites'). For the purposes of this advice, Habitats Sites are Special Areas of Conservation (SACs), possible SACs, Special Protection Areas (SPAs), Potential SPAs, Ramsar sites, and sites identified, or required, as compensatory measures for adverse effects on Habitats Sites. Although their regulatory frameworks differ, the general principles and approach for air pollution assessment outlined for Habitats Sites are also relevant for SSSIs. Where the following advice applies to both, we use the term protected sites. Where the advice or approach differs, the individual terms are used.

This includes advice on information that is required to assess this and how to interpret the results of air quality modelling for the decision maker to conclude whether air quality impacts would have an adverse effect on the integrity of a Habitat site or a SSSI. You should also consider any relevant caselaw that could affect how you carry out any air quality assessments.

Air pollutants

This advice covers the following air pollutants from the construction, operation and decommissioning phases of a proposal

- ammonia (NH₃)
- nitrogen oxides (NO, NO₂ or NO_x)
- nitrogen deposition
- acid deposition
- sulphur dioxide (SO₂)

Standing advice on air pollution and development is also available

here: <https://www.gov.uk/guidance/air-pollution-and-development-advice-for-local-authorities>

Whilst the standing advice does not cover NSIPs, it does include additional technical advice which may prove useful. However, in summary, Table 1 provides the steps that we advise should be taken to assess air quality impacts on protected sites. The applicant should provide their own assessment containing the information and detailed modelling you need. You need to review this and make your own conclusion.

Table 1: Sequential approach to air quality assessments

Stage	Step	Supplemental evidence/ basis for judgment
Initial screening for credible risk of an effect	1 Check Distance criteria - could significant emissions reach a protected site?	The Air Pollution Information System (APIS) includes an introduction to air pollution.

	Yes = move to Step 2 No = no further HRA required	APIS provides site specific information on the interest features of individual protected sites and the sensitivity to air quality impacts of those features. Please see Table 2 for industrial air pollution screening distances. For road traffic impacts, roads on the affected road network that lie within 200m of a designated site should be considered. Use Magic Map to check the location of designated sites. Search for the location then select the 'Designations' option.
2	Check if the qualifying habitats or supporting habitat of qualifying species are sensitive to air quality impacts. Yes = move to Step 3 No = no further HRA required APIS Site relevant Critical Loads and Levels (based on literature and professional judgement) http://www.apis.ac.uk/src1 Some habitats may not have a critical load because there is not enough data. In these cases, you should find the critical load for a similar habitat type or feature.	The qualifying features of Habitats Sites can be identified in the relevant Site Conservation Objectives and Supplementary advice packages, which include a definitive list of legally qualifying features. These objectives are available here. Alternatively, a list of qualifying features can also be found by searching for the Habitats Site and SSSIs on Designated Sites View , alongside Conservation Objectives and Supplementary Advice for Habitats Sites. The above links will also show whether any of the qualifying features for Habitats Sites have a Restore or Maintain Conservation Objective in relation to air quality thresholds (critical levels or loads).

			If the site is a SPA or an SAC/SSSI designated for an animal species (as opposed to a habitat), determine whether the predicted pollution effects on the supporting habitat will have a negative effect on the notified species.
Detailed AQ modelling	3	Undertake detailed modelling using a recognised dispersal model – i.e. Atmospheric Dispersion Modelling System (ADMS) Unless robust site-specific evidence is provided, we advise the lower range of the critical load should be used in modelling. If there are site specific reasons why it is more appropriate to use the higher end of the range, then this should be clearly evidenced.	Air Quality modelling should include relevant scenarios that are clearly identified. One such example of scenarios is a baseline plus future forecasts as follows: Baseline, a construction year, and future operational year(s), do nothing (without proposal), do something (with proposal); taking into account background trends for each pollutant). For proposals that will emit pollutants from a point source, it is helpful to provide isopleths of the dispersion modelling results, showing the predicted contours of pollutant concentration and deposition of the development. These may be assessed against the locations of protected sites and sensitive features within those sites. At least 3 years of meteorological data should be included within the AQ modelling for sources other than for road transport modelling The Institute of Air Quality Management (IAQM) has

			produced the following document to assist its members in the assessment of the air quality impacts of development on designated nature conservation sites: air-quality-impacts-on-nature-sites-2020.pdf
Applying screening thresholds	4a	Apply Screening Threshold Alone If below threshold alone, move to step 4b. If above = move straight to step 5	Ascertain the Process Contribution (PC) from the plan or project (emissions and predicted deposition). Apply Screening threshold (1% of critical level or load) alone using the <u>annual averages</u>. If the process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>alone</u> irrespective of the background levels.
	4b	Apply Screening Threshold In-combination. If below threshold in-combination = no LSE/significant risk of damage etc and no further assessment required. If above = move straight to step 5 Applicants might use the Joint Nature Conservation Committee (JNCC) 'decision-making thresholds' as a reason for not completing an in-combination assessment. If so, you should check they have correctly followed the JNCC guidance on decision-making thresholds. If this guidance shows they do not need to complete an in-combination assessment, continue to step 5. If applicants have not used the decision-making thresholds, or have not followed	Use information from competent authorities (Planning Portal, PINS NSIP register or Environmental Permitting register) to determine if there are plans or projects in the pipeline (not included in the current baseline) that should be considered in-combination If the combined process contribution is less than 1% of the relevant long-term benchmark (Environmental Assessment Level, Critical Level or Critical Load), the emission is not likely to have a significant effect <u>in-combination</u> irrespective of background levels.

		them correctly, they will need to provide an in-combination assessment.	
Detailed Assessment of ecological impacts	5	This step is to consider the ecological impacts of AQ on the interest features of the designated site and is not based only on numerical figures. If it is not certain whether sensitive features are located within the areas to be impacted, a site visit may be helpful to determine this. For SSSIs, this step should provide all the information necessary, including any required mitigation, for the decision maker to determine if there would be an adverse effect on a SSSI. If Habitats Sites are impacted by the proposals, move to Step 6.	The following information is likely to be helpful for the decision maker: Is the sensitive feature(s) located within the pollution footprint? Should it be there for the site to meet its Conservation Objectives or is there some other, natural reason (e.g. hydrology), why the sensitive feature(s) would not be expected to occur there? Check APIS Trends Tab for reasonable expectation on whether background pollution may be decreasing or not. Habitats that have already been subject to high background nitrogen deposition can develop tolerance to further deposition. This cannot be used to justify further exceedance as it would undermine conservation objectives to reverse decline. You should consider predicted effects on the species richness of a habitat against the site's conservation objectives.
Appropriate Assessment (AA) for habitats sites	6	The competent authority to undertake their AA to conclude whether or not there will be an adverse effect on integrity (AEOI) of habitats sites. Any mitigation proposed should also be assessed at this point. Should the AA conclude that the proposal would have an AEOI that cannot be excluded with mitigation measures, consider the derogation route of the HRA process.	Where mitigation is required to enable a conclusion of no adverse effect on integrity to be reached the AA must be able to show that mitigation measures can be relied upon to avoid adverse effects over the full lifetime of the project (ie construction, operation and decommissioning where relevant). To be viable, such measures should be effective, reliable, timely, guaranteed and of sufficient

	Should compensation measures be required under derogation, please contact Natural England for specific advice. Note: If an AA has been undertaken of the proposals <u>alone</u> and concluded that there will not be an adverse effect on integrity, if there are residual impacts that are not fully mitigated, these will need to be considered in combination with other plans or projects	duration. The assessment of such measures should be supported by evidence. When deciding on whether the proposals set out in the NSIP will have an adverse effect on Integrity on a Habitats Site, the Conservation Objectives and any supplementary advice should be taken into account. Including whether the site is already exceeding the environmental thresholds for ammonia, nitrogen oxides and nitrogen deposition and has a restore conservation objective.

Mitigation measures

If you cannot conclude there is no adverse effect, the applicant will need to apply mitigation measures. Measures will only be appropriate if you can quantify their effectiveness in reducing emissions on the protected site. You should check that mitigation measures are in place to avoid adverse effects on site integrity over the lifetime of the project.

Mitigation may include measures that:

- the applicant volunteers
- you impose through formal conditions or restrictions in any permission or authorisation – these may be different or stricter measures than ones proposed by the applicant

Examples could include:

- relocation or redesign of developments to avoid impacts on protected sites
- control of other emissions of the same pollutants with an overlapping effect
- a change in stack height for industrial processes
- Euro 6 standards for construction machinery
- adding wooded shelterbelts, trees, green walls and hedges to limit dispersal of emissions, as long as these measures in themselves would not negatively impact the protected site

Table 2: Industrial air pollution screening distances

Emission source	Distance for SSSIs	Distance for habitats sites
Industrial developments	2km	5km
General combustion processes (under 20MW energy input)	500m	500m
General combustion processes (20MW to 50MW energy input)	2km	2km
General combustion processes (over 50MW energy input)	2km	10km
Mechanical and biological waste treatment	500m	500m

Landfill waste	2km	2km
Compost (under 500 tonnes maximum annual operational throughput)	500m	500m
Compost (500 to 75,000 tonnes maximum annual operational throughput)	1km	1km
Compost (over 75,000 tonnes maximum annual operational throughput)	2km	2km
Airports, helipads and other aviation proposals	5km	5km
Oil and gas exploration and extraction	500m	500m
Quarries	200m	200m
Other industrial developments causing air pollution	500m	500m

Additional advice

Common Standards Monitoring¹ is used to define the ecological condition of a protected site. It is undertaken on a broader level and does not currently consider air quality impacts. The relevant benchmark for assessing impacts is the critical thresholds. Therefore, the existing status of a designated site should not be the sole reason for judgement on potential impact.

For many protected sites, the current background pollution may already be exceeding the relevant critical load/level from a different source type to the project being assessed (e.g. where the main source of background exceedance is due to agriculture, but the proposal is an industrial project). Proposals must consider their own impacts against the relevant environmental thresholds. There are many reasons why background levels are high, but the conservation objective is to 'maintain or restore' air pollutants to within these benchmarks. The objective would be undermined by proposals that add further emissions, including if it compromises any strategic initiatives to reduce air pollution levels.

You must determine if there is evidence that the increased emissions represent a measurable risk and could compromise the strategic initiatives. You would need to consider information on:

- the extent to which any declining national trends in air pollution, or strategic initiatives to tackle emissions affecting the site more locally, might otherwise lead to improvements
- the rate at which such improvements are anticipated
- the extent of the impacts of a plan or project, and whether those impacts can properly be considered temporary and reversible

If the affected area is small, consider the risk to site integrity proportionally. For example, how important is the area in terms of rarity, location, distribution, vulnerability to change and ecological structure. If it is a supporting habitat, consider its importance to the designated species on the site. Consider any site survey information that may provide evidence of existing impacts.

Emissions from road transport (if applicable):

Emissions from road transport may be an operational impact or be limited to the construction phase of proposals. Roads on the affected road network that lie within 200m of a designated site should be considered. If all affected roads are further than 200m from a protected site, then there is no likely significant effect (habitats sites) or no impact (SSSIs) on protected sites from air pollution.

Improvements in vehicle technology and a move to further electrification of the vehicle fleet will, over time, result in lower background levels of nitrogen deposition and nitrogen oxide pollution near to roads. As most sites are currently over the relevant thresholds and have a “restore” objective, this should be noted as a “retardation” of the restore objective and expressed in months and years. Retardation of less than one year is acceptable as air quality is considered against an annual average. Please note that ammonia impacts cannot be assessed in this manner as there is no certainty of a declining trend.

Defra Emissions Factor Toolkit

The Defra Emission Factor Toolkit (EFT) allows for gradual introduction of electric vehicles into the fleet (cars and LGVs) up to 2050. These are the emission factors we advise that NSIPs should be using (which we advise should also consider ammonia emissions as well as NO_x – using one of three sets of emission factors available). However, the User Guide to the EFT highlights that calculation tools only support assessment years 2018 up to 2030, reflecting that predictions and assumptions beyond then become less certain.

Where EFT calculated emissions are to be used after 2030 to inform air quality assessments, the EFT indicates that appropriate caveats around the limitations of the analysis must be included to accompany the assessment. We therefore advise that emission factors no later than 2030 are used for HRAs – which would mean percentages of EVs are at predicted 2030 levels. A key concern is that, although EVs themselves have no tailpipe emissions, and the percentage of them will increase, the remaining combustion engine vehicles on the road may become more polluting as they age as selective catalytic reduction technology may create ‘ammonia slip’ over time. Ammonia slip is the unreacted ammonia (NH₃) that escapes from a selective catalytic reduction (SCR) or selective non-catalytic reduction (SNCR) system used to reduce NO_x in exhaust gases.

Motorways within the affected road network

There is potentially an added complexity to the need for in-combination assessments when considering traffic on motorways, as including these roads can mean that the assessment takes account of traffic growth related to strategic factors or long range (external) trips that are independent of the specific plan or project and neighbouring plans or projects. These roads are strategically important and tend to have high volumes of traffic as well as being well represented in traffic models. The air quality assessment should therefore include traffic flows on these roads, but the external trips can be excluded from the initial screening assessment. A justification and explanation of which journeys are included and excluded in the traffic model should be provided.

The conclusions reached on the air pollution impacts of the HRA must be incorporated into the wider HRA conclusions for other impact pathways identified for the proposals.

How to Use this Advice in Decision Making

Provided you have followed the above advice and have been able to conclude there would be no adverse effects on any protected sites we would be able to agree with your decision to authorise the project.

Hope Moor Wind Farm

EIA Scoping Request

EN0110038

Newsham Parish Council

Response

June 2026

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Part I – Statement by Newsham Parish Council

This report sets out Newsham Parish Council's (NPC) response to Fred Olsen Renewables' Scoping Request for the Hope Moor Wind Farm. There are three parts:

Part I is this statement outlining NPC's position.

Part II is an independently prepared report by local resident and process analyst Dr Steve Myers. It presents the results of a community receptor-identification consultation undertaken to assist PINS' preparation of a Scoping Opinion for the proposed Hope Moor Wind Farm. NPC reviewed Dr Myers' report and decided to adopt and incorporate it as a substantial part of the council's response.

Part III contains additional matters to which local residents with relevant knowledge have drawn NPC's attention.

This NPC report does not argue for or against the development. Its purpose is to reduce the risk of incomplete scoping by drawing on local knowledge of how the area is used, experienced, and depended upon.

NPC considers that the identified receptors, pathways, and assessment gaps in Parts II and III should be taken into account in the Scoping Opinion.



Chair, on behalf of Newsham Parish Council

Part II – Community Scoping Input

1 Executive Overview

The need for an exercise to elicit community knowledge to inform scoping was identified following the conclusion of correspondence between the author and the Planning Inspectorate, North Yorkshire Council, and Fred Olsen Renewables.

The absence of such community knowledge from scoping presents four risks: (1) important receptors may be missed, under-described, or fragmented across separate topic headings; (2) magnitude and significance may be underestimated; (3) monitoring and mitigation may not be secured; and (4) responsibility for responding to consequences should the development go ahead may be unclear or displaced onto affected people.

The community evidence is described in Section 3, which identifies a substantial number of integrated receptors – i.e. receptors affected by interrelationships and combined effects that are not adequately captured if assessed only through standard topic headings. Appendix B gives examples of the types of impact that can be missed if these receptors are not identified for assessment.

A summary checklist of matters that appear to require explicit treatment in the Scoping Opinion is provided in Section 4, which compares Section 3 with the Scoping Request. The community evidence suggests that the assessment frame needs to be widened in both scale and detail.

The comparison in Section 4 should not be treated as exhaustive. This was a limited and unofficial exercise with restricted reach, yet it identified additional receptors and integrated receptors relevant to scoping, with further potential receptors and pathways still emerging at the time of writing. This report therefore has value in identifying receptors and pathways that a desk-based or topic-by-topic approach may miss. However, because the exercise was limited, it cannot remove the concern that a narrow scoping process may leave important matters outside the assessment frame.

2 Introduction

Fred Olsen Renewables (Olsen) has been granted a Section 35 direction to apply for a Development Consent Order under the Nationally Significant Infrastructure Project (NSIP) legislation. As detailed in my tripartite note of 31st January 2026, there were no plans for community consultation during the preparation of the Scoping Request. As this risks missing important receptors in the Environmental Impact Assessment (EIA) process, I have undertaken a community consultation exercise for scoping.

This report does not contain arguments for or against the wind farm, which are not appropriate at this stage of the development. Nor does it address wider questions such as the need for renewable energy or government policy. Rather, it is focused only on helping the Planning Inspectorate (PINS) in producing a Scoping Opinion, to support future environmental assessments, planning decisions, and monitoring and mitigation should the development go ahead. To that end, the exercise was focused on identifying pathways and receptors using an online questionnaire; where text was entered that included any support for or objections to the wind farm, only the receptor identification part of the comment was included in the analysis. Although this report refers to some potential impacts, it does so only to illustrate the kinds of assessment that scoping needs to include.

The community responses were of two kinds, with some overlap between them. The first identified individual receptors that might be affected by one or two pathways. Some of these are already included in Olsen's Scoping Request, but many locations are not.

The second kind was qualitatively different, describing how pathways and receptors interact in a way that cannot be adequately assessed by examining individual components.¹ In the author's process-analysis language,² these are system-level effects or emergent properties: effects that arise from the way several pathways, uses, and settings combine, rather than from any one component alone. The community evidence of such interactions is consistent with EIA legislation,³ the

¹ Examples are provided in Appendix B.

² The author's background includes both academic and commercial experience.

³ <https://www.legislation.gov.uk/ukxi/2017/572/regulation/5>

Planning Inspectorate's NSIP guidance,⁴ and Defra's work on upland communities.⁵ These integrated receptors are grounded in local knowledge of how the area is actually used and experienced. Their omission from the Scoping Opinion risks important impacts not being assessed in the Environmental Statement (ES).

Other scoping methodologies were available that, by involving the community, would have been less likely to leave the Scoping Request unduly narrow.⁶ My unofficial community consultation was limited in time, format, and scope. It falls far short of those formal methodologies and had limited reach. Nevertheless, although limited, the exercise is useful for scoping because even a small number of locally informed submissions can identify receptors and pathways that a desk-based or topic-by-topic approach may miss. However, this report should not be viewed as having exhausted the range of receptors that may have been omitted from the Scoping Request.

The methodology is summarised in Appendix A, the numerical summary of the community data is provided in Appendix G, and the use of artificial intelligence is described in Appendix C.

⁴ <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment>

⁵ <https://www.gov.uk/government/publications/uplands-review-a-report-on-upland-communities-in-england>

⁶ For example, the International Institute for Sustainable Development (IISD) recommends that the scoping stage should include extensive publicity, exhibitions, workshops, and other public-facing activities. See: <https://www.iisd.org/learning/eia/wp-content/uploads/2016/05/Public-participation.pdf>, pp. 1-2.

3 Receptors Identified from the Community Data

The community submissions reveal several recurring themes that show scoping should include receptors whose significance arises from systemic interactions – between pathway, place, use, and setting – rather than from any single topic considered on its own. If the receiving environment is broken down only into separate functional headings – such as noise, transport, ecology, heritage, landscape, tourism, or water – impact analyses risk under-describing or missing altogether those emergent aspects of the environment. In several cases, the community evidence suggests that what matters locally is how the various topics combine in practice.

The receptors or receptor classes listed below are structured using these systemic and ‘real world’ themes. They describe recurring combinations in the community evidence that require treatment as integrated receptors rather than using a more conventional topic-by-topic approach. They correspond to real ways in which the area is relied upon, used, and experienced by residents, visitors, businesses, farmers, and others. Their exclusion from scoping creates a risk that the impacts on important receptors will not be fully or accurately assessed.

3.1 Upland Water Interdependence

A major theme in the submissions is dependence on the integrity of an integrated upland water system. The community evidence points to an interdependent system in which various pathways bear collectively on several receptors. These pathways include the conditions of peat, sphagnum moss, ponds, drainage, ecology, land use, and water quality and quantity. The various receptors include home, holiday cottage, business, farm, habitat, or downstream water environment.⁷

Much of the proposed site is shown by Natural England’s 2025 peat mapping as covered by peat, with mapped depths ranging from 30 cm to 5 m;⁸ it is also located

⁷ Shaw Beck Gill – referred to in the submissions as GCR/SSSI – was particularly highlighted for potential wet heath or blanket bog disturbance, or flash flooding. Dous Gill was highlighted for water quality because it is used to supply livestock.

⁸ Peat data: Natural England Peat Map 2025. See Appendix D.

on one of the highest moors between the rivers Tees and Swale.⁹ There were 38 declarations of private water supplies with a further 13 uncertain whether their supply is private.¹⁰

These cannot be examined in isolation because the functioning of the receptors depends on the whole system and its integrity. Deep peat, for example, is both a receptor that may be damaged and a water store whose condition helps regulate the functioning of the upland water system. It may play a significant role in helping to stabilise and maintain the quality and year-round supply of water. If the impact on individual receptors were to be examined in isolation, it may overlook the systemic impacts that are just as critical – if not more so – than the individual components.

This is especially important in relation to local water supplies, on site and in the wider area between the Tees and Swale. Community submissions identify a significant number of private supplies drawn from springs, boreholes, streams, and other water sources that may be affected by the proposed site. Those supplies are relied upon for domestic use, livestock, farming operations, hospitality businesses, or a combination of these. The significance of the receptor therefore lies in the interdependence of several pathways and receptors.

The submissions identify numerous potential impacts, many of which are related and need to be assessed as a whole, such as disturbance to peat, disused mines, faster runoff, altered drainage patterns, reduced water retention, contamination, altered water table, the potential to create or exacerbate summer drought, and heightened flood risk during heavy rainfall in settlements below the site and downstream water courses. For example, in Dousgill, the spring supplying the residences has dried up only twice in four decades. Changes to the overall water system could change the spring's reliability. The review of the hydrological system should not be confined to the site, its immediate surroundings, or just a downstream frame. It should also extend to the wider hydrologically interconnected system on which these receptors depend.

⁹ Elevation sources: OS Landranger Map.

¹⁰ Areas of private water supply were identified in Barningham, The Stang, Thwaite, Hope Moor, Dousgill, Helwith, Scargill, Kexwith, Marske, Bushy Park, Newsham, Langthwaite, Whaw, and Reeth.

As the proposed site is at the head of many local private water supplies for domestic, livestock, and agricultural use, the community submissions identified the need to assess the degree to which wind turbine construction and operation will affect the private and mains water supplies, including the supplies' reliability and potential for contamination with concrete and other relevant substances.

Another topic for assessment is the possible disturbance or mobilisation of lead, cadmium, zinc, or other contaminants associated with historic mine workings and the potential for increased contamination to enter human and food-production water sources or flow down to the Swale and Tees. Local community knowledge highlighted the presence of mines, shafts, and shake holes on and around the proposed site, not all included on official maps, together with Environment Agency assessments of water contamination (see Appendix K).

A related but separate issue is what the presence of disused mines, shafts and shake holes on and around the proposed site may mean. The assessment should not assume the absence of subsurface mining-related risk but establish whether historic workings, collapsed features or associated drainage pathways could affect water quality, the water table, or ground stability during and after construction.

Also, community submissions asked for assessment of whether PFAS or other substances associated with blade erosion could enter human and food-production water sources.¹¹ Given the sensitivity of private water supplies, the various uncertainties above should be properly assessed rather than assumed to be of little consequence.

Several watercourses, particularly to the south and east of the site, form part of a wider downstream system connected with the Swale. There is a need to assess the impact of the proposed development on downstream contamination pathways and flood-management issues, including the implications for the Ure/Ouse/York system. For example, flood mitigation plans include the Mid Swale project. The assessment should include the current river levels as well as the projected increases in forthcoming years as a result of climate change.

¹¹ In checking this issue, I found research into blade erosion but was unable to find anything that looks at the impact in hydrologically sensitive upland systems such as Hope Moor.

Questions were also raised about the proposed temporary on-site concrete batching plant.¹² Assessment should include effects on the mains supply, including consultation with relevant water companies about water demand, source, pressure, and supply in Newsham.

3.2 Multi-Pathway Disturbance

A second recurring theme is the identification of receptors exposed to multiple concurrent pathways of disturbance during construction and operation. The community data identifies layered disturbance involving noise, shadow flicker, dust, vibration, traffic, lighting, and other constructional or operational effects such as tree and hedgerow removal, or alteration/removal of stone walls. A particular issue for assessment is the concrete dust and air pollution that may be created by the temporary concrete batching plant.

The submissions also identify the need to include, within the assessment of cumulative disturbance, the additional construction and operations that are associated with connection to the grid and site access. At present there is uncertainty about pylons, power lines, and grid connection, which need to be defined and included in the Environmental Statement because it is an associated infrastructure pathway that contributes to the multi-pathway disturbance receptor.

This matters because the significance for some receptors may lie less in any one pathway taken alone than in their combined incidence. A receptor may experience not one discrete nuisance, but an accumulation of disturbances extending across construction, operation, and associated changes to environmental conditions. Some submissions indicate that certain receptors already experience intermittent disturbance from other sources, including nearby military activity from army firing ranges, RAF night-time or low-flight training, heather harvesting, lorry and tractor movements, overspill from the A66 following an accident, and the forthcoming construction project on the A66. Therefore, the assessment needs to consider how project-related disturbance may add to or interact with those existing or increasing

¹² The proposal for potential on-site concrete production wasn't in the Olsen consultation materials. It was advised to a resident orally in response to questions at a consultation session.

baseline conditions. Separate treatment of noise, dust, vibration, transport, lighting, and flicker will fail to identify the combined burden as a receptor issue and take account of forthcoming increases.

The impact analysis also needs to address conditions in which multiple turbines act together, rather than relying only on standard assumptions about a single turbine over a standard distance. It should consider whether combined effects may arise in circumstances such as shadow flicker resulting from sunlight passing through several turbines, or noise aggregation and propagation under conditions that increase audibility at residential receptors, including topography, temperature inversion, and open-window conditions during warmer periods. The assessment should therefore examine how disturbance may be experienced across the Tees, Swale, and Arkengarth dales under real-world conditions, rather than only under average or standardised assumptions, and using the latest research. The noise assessment should address repetitive swishing or thumping and sounds that are low-frequency or have a distinct pitch, particularly at night and under propagation conditions where turbines may be audible at greater distances than predicted by average assumptions.

This theme also has a residential and wellbeing dimension. Some submissions refer explicitly to health issues including sensitivity to stress, sleep disturbance, low background sound conditions, or the loss of peace and quiet at times when tranquillity is currently part of the ordinary environmental baseline. The issue here is not the assertion of any connection between a specific receptor and medical outcome. It is the need for the assessment to recognise how a receptor exposed to multiple concurrent disturbances may experience a different kind of burden from one exposed to a single pathway only.

3.3 Immersive Landscape Experience

The community data often describes the moor as an immersive landscape experience. In several submissions, the value of the landscape is described in terms of psychological restoration or the beneficial effect of being in an open upland environment with limited large-scale modern infrastructure. The overall experience is created through the interaction of the moor's many attributes, such as openness,

remoteness, tranquillity, dark skies, bird song, peat, heather, wildness, archaeology, and the absence of large-scale modern infrastructure. The experience is enhanced by 360° views across several landscapes, most of which are protected, including the Yorkshire Dales, North Pennines, Nidderdale, North York Moors, and Teesdale as far as the North Sea. The immersive character is further enhanced by dark nights that, under suitable conditions, include the visibility of the Milky Way, stargazing, and the observation of Northern Lights aurorae.

The significance of this receptor lies in the experience of moving through and engaging with a landscape whose character is valued as a whole. Residents, tourists, cyclists, horse riders, and others visit the moor for its overall experience. The assessment needs to examine the impact on that whole experience rather than just the individual parts. The potential impact will not be captured if scoping treats views, routes, noise, wildlife, and landscape character as unrelated, piecemeal matters and overlooks how they interact to create an immersive landscape experience.

3.4 Heritage Character

Community submissions identified a heritage character whose significance is shaped in part by individual assets¹³ and in part by the setting, intervisibility, and the wider historic landscape of the moor. The community submissions suggest that this applies in two directions. First, the proposed site itself – and possibly nearby new access roads and grid connection – contains heritage features whose significance depends in part on the moorland context in which they are situated. On the proposed site there are historic routes, prehistoric landscape features, ancient rock-art or carvings, burial features, archaeological remains, and prehistoric settlement remains and stone features. Beyond the site, there are listed buildings, scheduled monuments, conservation areas, castles, and other designated heritage assets. However, the significance of this receptor does not lie just in the presence of those individual features. It also lies in the way the open moor contributes to their character, setting, and relationship to one another.

¹³ A large number of Historic England sites were identified in the vicinity of the proposed site. See Appendix I.

Secondly, the proposed site also forms part of the landscape setting of heritage assets beyond it. Indicative examples of this intervisibility include Barnard Castle (the castle), Scargill Castle, Dalton Mill, Bowes Castle, Bowes Museum, and Raby Castle. In this respect, the relevant receptor is not simply the individual heritage asset in isolation, but the heritage character created by the relationship between asset, setting, outlook, and the wider moorland landscape.

One further aspect identified in the submissions is that some heritage significance is carried by historically meaningful routes and places whose value depends on continuity of use, setting, and local memory. This includes, for example, the Funeral Walk between Newsham and Barningham – used for transporting the deceased to the village church, St Michael's. The significance is not the same as an ordinary right of way, and it may be affected by the development site, access roads, and grid connection. The community evidence therefore suggests that heritage should not be treated only as a list of designated features, but as a receptor class whose significance depends on the contribution made by the moor to historic setting, cultural continuity, and landscape context.

3.5 Residential Character

The community submissions identified the importance of setting and amenity character to their residences and hospitality businesses. These include rural properties, local villages, or dwellings further afield that have direct or partial line of sight to the proposed development or may be affected by noise or other pathways. The receptors included residential use of gardens and external amenity areas, including day- and night-time enjoyment of views, peace and quiet, dark skies, and wildlife. 54 submissions identified this receptor – along with multi-pathway disturbance – as relevant to their ongoing health (both physical and mental). This is a contributory reason to them living in the area and suggests the residential experience is often one of psychological restoration through peace, escape, and a day-to-day lived benefit. It is not just a matter of the formal amenity or of visual or acoustic attributes.

The relevant receptor is the overall residential setting and external amenity together with nearby shared spaces valued for ambience and community use.¹⁴ Various pathways were identified that could impinge on that character, such as noise, shadow flicker, night-time aviation lighting, construction disturbance, and changes in landscape character associated with large-scale energy infrastructure. The combination tended to vary with location and distance from the proposed site.

For residential receptors, the noise assessment should not be limited to average figures or a simple distance radius. It should apply the real-world conditions identified in Section 3.2 to residential settings, including hot summer nights when windows are open, topography, non-prevailing wind propagation, temperature inversion, and the cumulative effects of multiple turbines.

A further matter for assessment is the impact of construction traffic on listed buildings and private houses, particularly in Newsham. This is especially relevant for older buildings very close to the proposed traffic route that are reported to have little or no modern foundations. This issue also needs to be drawn to the attention of Historic England in case it is missed by desk-based scoping.

3.6 Ecological Interdependence

Community submissions identified ecological sensitivity as a receptor class whose significance lies in the vulnerable and interconnected conditions on which various habitats and species depend, as well as the movement of birds across the moors. The submissions refer to the interdependence of peatland systems, blanket bog, sphagnum bog, wet heath, ponds, streams, breeding areas, and species-supporting habitat, together with ground-nesting birds, waders, raptors, bats, deer, insects, amphibians, and notable flora. Some submissions highlighted the centrality of the peat to the interdependent ecological conditions.

What is of most importance to this receptor is not the presence of any particular species, but the conditions and interdependence that sustain multiple species. The Tees-Swale and North Pennines landscape has seen substantial conservation effort to sustain an integrated environment capable of supporting populations of waders

¹⁴ Residential receptors were nominated in numerous locations. See Appendix I.

such as curlew, lapwing, redshank, and snipe. As a result, these have remained stable across the northern uplands of England despite national decline.¹⁵ Some members of the community also report observations of black grouse, which have been in steep decline elsewhere in Britain.¹⁶ Forestry England have identified the North Pennines and Yorkshire Dales — both lying very close to the proposed site — as two of the eight areas with the greatest ecological potential to contribute to Golden Eagle recovery in England.¹⁷ Wind farms formed part of the risk when identifying the best areas.

The interconnected locations in the submissions extended beyond the proposed site to include nearby conservation areas, sphagnum bogs, the Stang Road corridor, Newsham Tarn and other water-fed habitats around Newsham, Scargill, Helwith, and the wider Barnard Castle environs. Some submissions call specifically for survey work in relation to ponds, watercourses, bog habitats, and breeding or nesting areas, whilst taking account of the interdependence and sensitivity of the conditions on which they depend, both on the proposed site and the surrounding area. If the assessment examines only the proposed wind farm's impact on individual species, or individual functional categories, it will miss the impact on the interdependence that is also central to how multiple species can survive.

Attention was also drawn to various regional or national initiatives concerned with nature recovery, habitat restoration, biodiversity, and wild-landscape character.¹⁸ The EIA/ES needs to consider the impact of the development on such initiatives.

3.7 Agricultural and Land-Managed Use

Community submissions also identify agricultural and land-managed use as a distinct receptor class. This includes farms, grazing land, livestock areas,

¹⁵ <https://www.northpennines.org.uk/wp-content/uploads/2022/01/Tees-Swale-Programme-Project-Summaries.pdf>

¹⁶ One member of the community reported, during a 10-mile walk within the boundary of the proposed site, they observed 9 skylarks, 19 curlews, 46 lapwings, 4 mallards, 13 golden plovers, 7 greylag geese, many red grouse, 1 stonechat, 1 red kite, 1 black grouse, many starlings, 17 oystercatchers, 3 snipe, 1 kestrel, 7 fieldfares, and 1 common buzzard. Another reported counting 22 curlew flights in 24 minutes between Newsham and the proposed site.

¹⁷ <https://www.forestryengland.uk/nature-wildlife/golden-eagles>

¹⁸ Community feedback suggests many such schemes are supported by the Environment Agency.

gamekeeping land, and other managed rural land whose significance lies in practical use and management rather than in ecology or hydrology taken in the abstract.¹⁹ In some submissions the main question related to the reliability and quality of private or local water supplies; in others it is the possible effect of access changes, habitat disturbance, construction traffic, infrastructure corridors, or changes to land condition.

The submissions refer to sheep and cattle breeding and movement, livestock water points, pasture, access to fields, the operation of farm and estate land, gamekeeping, and conservation management. A number of these activities, and the locations in which they occur, also overlap with water dependence, heritage, or tourism, but the organising principle here is the continued practical use and management of rural land. The receptor is therefore the continuity of agricultural and land-managed use on the site and in the wider area. If the assessment treats water, access, habitat disturbance, traffic, and land condition as separate matters, it may miss the effect on farmers' and gamekeepers' ability to continue managing the land in practice.

Some community evidence also raised air-quality baseline issues associated with moorland burning or heather management, including whether the proposed development could alter the frequency or pattern of such burning and thereby affect particulate exposure.

3.8 Recreation and Destination Use

The community submissions identify the site, the surrounding area, and wider locations as receptors of recreation and destination use, rather than merely as a set of isolated rights-of-way or visitor assets. The submissions refer to walking, cycling, riding, open-access use, scenic climbing points, landscape photography, long-distance routes, and wider visitor draw. In many cases these are valued for the quality of the surrounding experience: openness, remoteness, dark skies,

¹⁹ The locations of submissions included Barningham, Dousgill, Helwith, Scargill, Spanham, Kexwith, and Marske.

archaeology, wildlife, and the sense of being in a relatively undeveloped upland landscape.

Locally, residents often use the pathways or bridleways crossing the site or nearby moors, such as Harker Moss – on the East side of which a former resident's ashes appear to be buried in an informal grave. A particular note was made of the potential road-safety interaction between cycling and increased construction/operational traffic.²⁰ Also, several submissions identified horse and rider safety, including potential behavioural responses to turbines, lighting, noise, and moving shadows, and the potential reduction in use of bridleway networks. A further potential danger for assessment is safety during high winds and/or icy conditions, such as the shedding of ice from turbine blades. Some submissions identified perceived safety and fear responses as access issues, acting as a deterrent to use the bridleways and open-access land.

Various hospitality businesses in the local and wider area depend in part on landscape character, tranquillity, habitat quality, conservation value, and rural road access. The impact assessment therefore needs to consider tourism and hospitality impacts within the local context, rather than relying only on national or regional research that may not capture displacement away from destinations where the landscape forms a significant part of the visitor draw.²¹ The assessment should also consider actual or perceived effects on guest confidence, insurability, and business viability.

This receptor class includes both ordinary local use and nationally significant routes or destinations. The submissions identify visibility of the site from various points along the Pennine Way and Coast to Coast National Trails, North Pennines National Landscape and UNESCO Geopark, Yorkshire Dales National Park, Nidderdale

²⁰ For example, Moor Lane – which runs from Helwith to Newsham – is a single track and has large downhill sections and blind bends down which cyclists often travel too quickly.

²¹ 82 submissions identified a potentially detrimental impact on tourism, due to the moor being a part of the attraction or the business' proximity to the moor. These submissions were not limited to the immediate area of the site but included: the town of Barnard Castle in County Durham; villages such as Buckden, Cray, Hubberholme, Starbottan, and Kettlewell in the Yorkshire Dales National Park; and some villages or parishes in Nidderdale and Wensleydale. Submissions also identified the need to include national tourist organisations – such as the Ramblers Association – to assess activities potentially moving to undeveloped landscapes.

National Landscape, and Teesdale.²² They also identify destinations and businesses whose appeal depends on these qualities, including Scargill Castle,²³ Helwith tea garden, Tan Hill Inn, rural holiday locations around the proposed site, and visitor-facing locations further afield, such as Barnard Castle and Reeth.

What matters here is the continued use and draw of the area as a place people travel through, visit, and value for a distinctive upland experience.

3.9 Rural Roads and Access Network

Community submissions identify the rural roads and access network serving villages, farms, and dispersed properties as a distinct receptor class whose significance lies in its vulnerability to construction and operational burden – especially when added to existing planned works such as the A66 dualling. The submissions refer repeatedly to narrow lanes, single-track roads, bridges,²⁴ verges, flood- and snow-prone routes, passing places, commuter access, and use by cyclists and horse-riders. The high number of accidents on the nearby A66 was also highlighted for cumulative assessment with increased construction and operational traffic for the site, access, and grid connection.

There are two key issues in this receptor class. One is the use of local roads for recreation or as amenity through walking, cycling, driving, or shared roadside community spaces. The other is dependence on a constrained transport network for everyday movement, agricultural operation, and access to homes and businesses. At present, the two mix satisfactorily, but can be strained when there is overspill from the A66 due to accidents.

Indicative examples in the submissions include roads through and connecting Barningham, Helwith, Newsham, Barnard Castle, the Stang Road corridor, Whipperdale Bank, Stang Lane, and other minor-road corridors that may be required to carry abnormal loads or heavy construction traffic. Several submissions refer to

²² A wide range of locations affected by the proposed site was identified – see Appendix H.

²³ Scargill Castle is a Grade II listed medieval castle, scheduled monument, and part holiday let with views of dark skies.

²⁴ Bridges were mentioned in some submissions because residents understood The Stang might be used as an access route. As Olsen's current chosen route does not use The Stang, bridge-related concerns are not carried forward in Section 4.

existing flooding, potholes, narrow geometry, weak verges, and already difficult passing conditions. Moor Lane (from the proposed site down to Newsham) is frequently flooded in various places causing large potholes to appear in the road. The potential for increased flooding to put some houses at risk was also flagged for assessment.

The receptor is the wider rural access network and the communities and hospitality businesses who depend upon it.

3.10 Operational Environment Uses

A smaller but distinct group of submissions identifies uses of the area that do not sit comfortably within the main receptors above, because their significance lies in the area functioning as an operational environment rather than simply as landscape, amenity, or recreation. These include military training land and RAF low-flying activity throughout the Tees valley. The assessment should examine possible effects on MOD-related operations such as telecoms, radar, and signal interference as well as potential knock-on effects if activity is displaced and causes greater disturbance to residents elsewhere.

Submissions also reported private helicopters and paramotors flying in the area. Other uses depend on open upland airspace, darkness, visibility, or the absence of large-scale vertical infrastructure, lighting, or other features affecting operational suitability. These include Feldom Range night training, which sometimes makes use of flares, and may therefore be affected by turbine night lighting in a way that desk-based scoping might not identify.

The significance of this receptor lies in the area's continuing suitability as a flexible, operational environment. If assessment is confined to separate topics such as aviation, lighting, noise, or military consultation, it may miss the effect on that operational environment itself and any indirect effect on residents arising from displaced activity.

3.11 Other Locally Identified Receptors

As explained in the introduction (Section 2), community submissions identified two kinds of receptor – individual receptors with one or two pathways, and integrated

receptors that emerge from the interaction of several pathways and receptor groups. Where individual receptors relate to an integrated receptor, they have been referred to in one of the above sections – either in the text or in a footnote. However, there are some submissions that identify locally significant receptors that do not fit neatly within the main classes above, but which should not be lost in a generic heading. This subsection documents other locally identified receptors that have not yet been referred to.

Newsham Village Green was highlighted as a particularly vulnerable area for potential accidents as it is a shared community space used by children and residents, for various informal and organised events. Examples include the annual carnival or playing football which, in the absence of pavements, can encroach on the road. The relevant pathway is the possible effect of construction traffic or increased volume of normal traffic, and the associated impact on safety and amenity – particularly for children playing on the green. Even if a new, alternative access route is to be built, the interim risks on Newsham Village Green need to be assessed.

The road through Newsham is crossed above lorry height by more than 30 telephone/broadband cables and some power cables, which are for residential and business purposes. Such telephony, internet, and electric mains services in Newsham need to be treated as a receptor, with particular attention on how they will be affected by oversized construction traffic.

Also, the impact on travellers who park on the verges at the Rokeby Inn/Smallways junction of the A66 needs to be assessed. This is an established stopping point, and the assessment may need to cover several issues, including safety, disturbance, and possible legal implications.

The status of the North Pennines National Landscape as a UNESCO Global Geopark was also highlighted. Its significance lies in the wider interpretive and educational value of the landscape, rather than in any single heritage, tourism, or ecological designation taken in isolation.

The submissions also identify some film and television locations, such as Healaugh Crag, where the value of the receptor lies in the open landscape as a cultural backdrop – e.g. for historical drama – rather than in standard amenity or route use alone.

Several submissions also highlighted that the site already acts as a significant carbon store, principally through the peat which covers much of the site and, as suggested by Natural England's 2025 peat map,²⁵ can be up to 5 m deep. These submissions identify a more general climate receptor, through the release of carbon due to the proposed development, access, and connection to the grid.

These receptors are not numerous, though this needs to be considered against the relatively low participation rate in the consultation due to the short timescales and limited official support. Important receptors may be overlooked if scoping fails to take advantage of local knowledge and the receiving environment is reduced to standard categories.

²⁵ See Appendix D.

4 Comparison with Scoping Request

Section 3 sets out various receptors and pathways raised in the scoping community consultation exercise. The present section compares those issues with Olsen's Scoping Request and identifies matters that appear to need explicit treatment in the Scoping Opinion. There are three main issues.

The first issue is that the Scoping Request's topic-led structure tends to fragment receptor-level effects. The issue is not whether such matters are mentioned somewhere under conventional topic headings – in many cases those headings are present, which underlines their potential relevance to likely significant effects. Rather, as a result of the fragmentation, the Scoping Request overlooks system-level effects or emergent properties that arise from the interactions between functional topics. Unless PINS requires explicit assessment of integrated receptors, those system-level effects may not be assessed. The suggestions within the Scoping Request to read related chapters simultaneously do not remove this issue. The integrated receptors need to be identified and properly assessed in their own right.

Secondly, there are some areas of detail or granularity that do not seem to be included in the Scoping Request. Whilst it is possible that such details may be covered in the final assessment, it is also possible they may be overlooked. There is no clear mechanism by which later public consultation will reliably recover those community-derived receptors and pathways that are missing at the scoping stage.

Thirdly, the geographical scope is sometimes limited on the basis of standard or common assumptions – for example, for private water supplies or listed buildings. Whilst common assumptions can be a starting point, they can have the effect of scoping out receptors that have the potential to be significantly affected. The geographical scope needs to take into account the unique circumstances of the proposed site and the wider area in which it is situated. A limited geographical scope may lead to an underestimate of the significance or magnitude of an impact, or a failure to implement appropriate monitoring, mitigation, or remedial measures should the development proceed.

Therefore, within this section, bullet points are provided that summarise the community feedback in Section 3. The numbers correspond to Section 3 – e.g. the

bullets under 4.1 relate to the narrative in 3.1 – which provides expanded descriptions. Those bullets are then rated according to whether they appear to be not identified (19), minimally covered (20), partly covered (29), or mostly covered (7) by the Scoping Request. There are also several more specific or qualified ratings where required by the nature of the issue.

For the avoidance of doubt, where this section states that assessment is “not clear” or similar, it refers to the lack of clarity in the Scoping Request about whether the matter will be considered in the ES; it does not imply uncertainty about the relevance, likelihood, or potential significance of the receptor or pathway identified by the community evidence.

Please note, this report has been prepared rapidly to assist the Scoping Opinion process within the available timescale. It is not a full audit or exhaustive verification of the Scoping Request but a comparison against the specific matters raised in the community consultation. In some cases, where community-supplied information seems to conflict with the Scoping Request or Olsen’s consultation materials, the matter has been checked and, if unresolved, flagged for clarification. Nevertheless, this report was not produced from an exhaustive verification exercise. Its primary purpose is to identify receptors, pathways, and assessment gaps that require explicit consideration at scoping.

4.1 Upland Water Interdependence

4.1.1 Integrated upland water system: assessment based on systemic interactions rather than only on separate hydrology, ecology, peat, drainage, water-quality, or land-use topics.

***Minimally covered:** Relevant topical headings are included in the Scoping Request, and the fact of some interrelationships between potential effects is acknowledged.²⁶ However, these interrelationships are addressed by suggesting the other topic chapters should be read in parallel. The Scoping Request does not identify what the interrelationships or systemic effects are,*

²⁶ Scoping Report, 9.1.3.

nor does it list the integrated upland water system as a receptor in its own right.

4.1.2 Peat as water store and receptor: assessment of peat, sphagnum, and associated habitats both as receptors that may be damaged and as water stores helping to regulate the upland water system, including possible effects on runoff, drainage patterns, water retention, water table, drought resilience, and flood risk.

***Partly covered:** Various aspects of peat are covered, but it is not clearly scoped as a key part of the integrated upland water system, acting as a water-storage receptor regulating runoff, water retention, water-table behaviour, drought resilience, and flood-risk mitigation within the wider upland system. See also the note under 4.12.1 on reconciling discrepancies between peat maps.*

4.1.3 Geographical scope: given the site's upland/headwater position, include all water sources and uses between the Tees and Swale that may be affected by changes to the upland water system.

***Partly covered:** The Scoping Request identifies the site plus 500 m, and a precautionary 2 km downstream. However, the proposed site is in an upland/headwater position of an integrated upland water system that feeds multiple private supplies through streams, springs, and boreholes at varying distances (see 4.1.5). The Scoping Opinion should include all potentially affected water supplies where quality or reliability might be altered by changes to this part of the integrated upland water system.*

The integrated water system of which the site occupies a headwater position also feeds the Tees and Swale.²⁷ Despite the distance of approximately 7 km, there may be consequences for the Swale/Ure/Ouse system and associated flood mitigation schemes related to York (see 4.1.9). The scope should include assessment of potential consequential effects for the Mid Swale project and other flood mitigation schemes.

²⁷ See Appendix K "Environment Agency Catchment Data Explorer" for stream connections between the proposed site and the Swale.

4.1.4 Water table: assessment of how it might change and impact private water supplies, ponds, streams, and habitats.

***Minimally covered:** Many hydrological topics are covered, but water-table change is not itself clearly scoped as a specific pathway affecting springs, boreholes, ponds, streams, and water-dependent habitats.*

4.1.5 Private water supplies: identification and assessment of all potentially affected springs, boreholes, streams, and other private water sources, including reliability, quality, dependence on the wider water system and water table, and effects on homes, farms, livestock, hospitality businesses, and other local uses.

***Partly covered:** The (non-comprehensive) community consultation included 38 reports of private water supplies, which are essential for domestic, animal, agricultural, hospitality, and food-production use. However, the Scoping Request indicates that private water sources will be investigated within a limited geographical scope. There is no clear commitment to identifying all potentially affected private water supplies whose quality or reliability might be altered by changes to the upland water system, given the site's headwater position. Also, the Scoping Request contains only a qualified commitment to 'avoid impacts on private water supply sources where possible'.²⁸*

The Scoping Opinion should therefore require explicit identification and assessment of all potentially affected private water sources, including their reliability, quality, hydrological dependence, and consequences for homes, farms, livestock, hospitality businesses, and other local uses. The ES should identify what measures would be required to maintain clean, reliable supplies to all essential water sources that may be affected by the development. This assessment should also include the consequences (including socio-economic, which Olsen propose to scope out) of supply disruption for domestic use, livestock, farm operations, hospitality premises, and other facilities dependent on private or local water sources.

²⁸ Volume B, Comm Hy-04, p. 3A-6, emphasis added.

Without such identification and assessment, a supply affected outside Olsen's proposed study area may have no agreed baseline, monitoring mechanism, trigger threshold, or clear route for remedial action if quality or reliability changes during or after construction.

4.1.6 Construction and operation effects on water supplies: including reliability and quality of private and mains water supplies and potential contamination from concrete or other substances.

***Partly covered:** Many of the relevant topics are covered in the Scoping Request. However, the assessment is not clearly framed around the reliability and quality of actual private and mains water supplies as essential receptors. There is no clear commitment to assess mains-water demand, source, pressure, and resilience, particularly in relation to any temporary concrete batching plant and its potential effects on local supplies such as Newsham, including consultation with the relevant water companies.*

4.1.7 Historic mines, shafts, and shake holes: assessment of whether historic workings, collapsed features, or associated drainage pathways could affect water quality, water table, or ground stability, including whether lead, cadmium, zinc, or other contaminants could be disturbed or mobilised into human and food-production water sources or downstream watercourses.

***Partly covered:** The Scoping Request identifies historic lead mining, with a ground stability risk and potential contaminants, but mainly in the context of geology and land contamination. It is not clearly framed as an integrated mine–water pathway potentially affecting water quality, water-table behaviour, and human or food-production water sources. Nor does it specifically identify the possible mobilisation of contaminants into downstream watercourses during or after construction as needing assessment.*

4.1.8 Blade erosion and water sensitivity: assessment of whether PFAS or other substances associated with blade erosion could enter human and food-production water sources.

***Not identified:** The Scoping Request includes general pollution-prevention and water-quality monitoring commitments, but I have not found any reference*

to PFAS, blade erosion, blade-derived contaminants, or assessment of whether substances released during operation could enter human or food-production water sources in this hydrologically sensitive upland setting. As discussed in 3.1 (footnote 11), I was unable to find any significant research that covers this specific point. Given the criticality of human and food-production water supplies, the Scoping Opinion should require evidence-based assessment rather than leaving this pathway outside the scope because published research appears limited.

4.1.9 Long-range downstream flood management: implications for the Swale, Ure, Ouse, and York system, including flood-management work such as the Mid Swale project, current river levels, and projected increases in future years due to climate change.

***Minimally covered:** The Scoping Request scopes in increased downstream flood risk during construction and states that the FRA will consider climate change. However, this appears to be framed mainly around local flood risk and limited downstream study distances. It does not clearly identify the longer-range flood-management pathway involving the Swale/Ure/Ouse/York system or flood-management schemes such as the Mid Swale project.*

4.2 Multi-Pathway Disturbance

4.2.1 Combined disturbance: assessment of combined burden on receptors exposed to multiple disturbance pathways together, rather than only separate treatment of noise, shadow flicker, dust, vibration, traffic, lighting, and construction effects.

***Not identified:** Relevant disturbance topics are included in the Scoping Request, but combined multi-pathway disturbance is not identified as an integrated receptor issue. The Scoping Request appears to treat noise, shadow flicker, dust, vibration, traffic, lighting, and construction effects mainly through separate topic assessments, rather than assessing the combined burden on receptors exposed to several pathways together.*

4.2.2 Construction and operational phases: assessment across both construction and operation, including how temporary construction effects may combine with longer-term operational disturbance.

Partly covered: The Scoping Request recognises construction, operation, maintenance, and decommissioning phases and assesses some effects by phase. However, it is not clear that the ES will assess how temporary construction disturbance may combine with longer-term operational disturbance as a cumulative burden on the same receptors across the project lifecycle.

4.2.3 Grid connection and site access: inclusion of construction and operational disturbance associated with grid connection, power lines or pylons, site access, and any associated infrastructure.

Minimally covered: Site access and internal cabling are included in the Scoping Request, but off-site grid connection infrastructure, including any power lines or pylons, is not included for meaningful assessment at this stage. The Scoping Request therefore does not clearly include construction or operational disturbance from grid connection and associated infrastructure as part of the combined multi-pathway burden on affected receptors.

4.2.4 Existing and future baseline disturbance: assessment of how project-related disturbance may add to existing or planned disturbance, including military activity, RAF low-flying, heather harvesting, tractor/lorry movements, A66 accident overspill, and A66 dualling works.

Minimally covered: The Scoping Request recognises some relevant baseline or future-baseline matters, including A66 works and military activity. However, these are not clearly assessed as existing or planned disturbance conditions affecting the same receptors. It is not clear that the ES will assess how project-related disturbance may add to or interact with existing disturbances as part of the combined multi-pathway burden.

4.2.5 Temporary concrete batching plant: assessment of concrete dust, air pollution, noise, traffic, vibration, water demand, and other disturbance associated with any temporary on-site concrete batching plant.

Minimally covered: *The Scoping Request identifies that some associated effects of a temporary concrete batching plant would be assessed, particularly water abstraction and wastewater discharge. However, it is not clearly scoped as one of the contributors to combined disturbance in its own right, including concrete dust, air pollution, noise, traffic, vibration, water demand, and other effects on nearby receptors such as Newsham village.*

The ES should also justify whether any fixed air-quality study boundary, including the 250 m screening distance, is adequate in this exposed upland setting, where wind may carry dust towards sensitive human receptors beyond that distance.

4.2.6 Multiple turbines acting together: assessment of whether multiple turbines may combine to increase effects, including shadow flicker, noise aggregation, and noise propagation.

Partly covered: *The Scoping Request includes operational noise prediction for the proposed wind turbines, inter-project cumulative operational wind-turbine noise assessment, and shadow-flicker assessment. However, it is not clear that the ES will specifically assess whether multiple turbines within the Hope Moor array acting together may increase receptor-level effects, including shadow flicker from several turbines, combined noise from multiple turbines within the scheme, and noise propagation under conditions that increase audibility.*

Also, the 1.75 km scope for the assessment of shadow flicker is derived from what is “commonly considered”²⁹ to be the shadow reach from a single turbine. However, there is no calculation for the geographical reach of shadow flicker from multiple turbines aligning with the sun and the receptor. Olsen should justify whether the ten-rotor-diameter / 1.75 km study area is sufficient for a multi-turbine array, including whether cumulative or sequential shadow flicker from more than one turbine could affect receptors outside that distance.

²⁹ Scoping Report, 14.2.2.

4.2.7 Real-world noise and propagation conditions: assessment of noise across the Tees, Swale, and Arkengarth dales under real-world conditions and using the latest research, including topography, temperature inversion, night-time conditions, low background sound, and open-window conditions during warmer periods.

***Partly covered:** The Scoping Request includes baseline noise monitoring, daytime and night-time noise limits, recognised wind-farm noise guidance, predictive modelling, and a worst-case correction for concave topography. However, it is not clear whether the ES will rely mainly on averaged or standardised assumptions, or whether it will assess real-world variations in noise propagation across the Tees, Swale, and Arkengarth dales, including conditions that may increase audibility beyond standard assumptions.*

4.2.8 Specific noise characteristics: cumulative assessment of repetitive swishing or thumping, low-frequency sound, and sounds with a distinct pitch.

***Partly covered / partly scoped out:** The Scoping Request proposes to scope out infrasound, low-frequency noise, tonal noise, and excess amplitude modulation at the planning-stage assessment. It is not clear that the ES will use current evidence to assess specific noise characteristics relevant to receptor experience, or justify whether the scoped-out characteristics can safely be excluded in this location.*

4.2.9 Residential and wellbeing dimension: assessment of how multiple concurrent disturbances may affect residential amenity, sleep, tranquillity, stress sensitivity, and peace and quiet, without needing to assert a specific medical outcome.

***Partly covered:** The Scoping Request recognises some residential and wellbeing-related matters, including noise-sensitive receptors, stress or anxiety from construction disruption, and annoyance, sleeplessness, and stress associated with operational noise and shadow flicker. However, these matters appear to be divided between topic chapters. It is not clear that the ES will assess the residential and wellbeing burden of multiple concurrent disturbances.*

4.3 Immersive Landscape Experience

4.3.1 Whole landscape experience: assessment of the moor as an immersive landscape experience, rather than only as separate views, routes, noise, wildlife, dark skies, archaeology, or landscape-character topics.

***Not identified:** The Scoping Request includes multiple relevant assessments as separate topics. However, it does not identify the moor as an immersive whole-landscape experience whose value arises from the interaction of openness, remoteness, tranquillity, dark skies, wildlife, archaeology, and the absence of large-scale modern infrastructure.*

4.3.2 Restorative value and tranquillity: assessment of the value of the moor for psychological restoration due to the combination of its many natural aspects.

***Minimally covered:** The Scoping Request recognises relevant natural components of the moor but does not frame assessment around the moor's restorative value as experienced through its overall natural character (see also 4.5.4, footnote 32).*

4.3.3 Movement through the landscape: assessment of how residents, walkers, cyclists, horse riders, visitors, and other users experience the moor whilst moving through it, not only from fixed viewpoints.

***Partly covered:** The Scoping Request identifies routes and visual receptors, but assessment appears to be framed mainly around visual effects on routes and viewpoints, rather than the immersive experience of users moving through the moor.*

4.3.4 Dark skies and night-time experience: assessment of dark skies, stargazing, Milky Way visibility, Northern Lights observation, and the effect of turbine lighting on the night-time landscape experience.

***Partly covered:** The Scoping Request identifies visible aviation lighting, night-time visual effects, and effects on dark-sky designations. However, it does not clearly frame dark skies for assessment as a lived night-time landscape experience that contributes to tranquillity and residential amenity.*

4.3.5 Long views and surrounding protected landscapes: assessment of 360° views and the interrelationship between the proposed site and surrounding landscapes, including the Yorkshire Dales, North Pennines, Nidderdale, North York Moors, Teesdale, and views towards the North Sea.³⁰

***Mostly covered:** The Scoping Request includes a 45 km LVIA study area, ZTV mapping, landscape designations, landscape character assessment, and representative viewpoints. Community submissions identified a wide range of locations for assessment that may be affected by the proposed site, some of which are covered in the Scoping Request (see 4.12.3). The remaining gap is that the Scoping Request does not clearly frame assessment around the 360° views and the reciprocity and interrelationship between the proposed site and surrounding landscapes.*

4.4 Heritage Character

4.4.1 Heritage character beyond individual assets: assessment of the heritage character of the moor and its surroundings as a whole, shaped by assets, setting, intervisibility, cultural continuity, local memory, and the wider historic landscape, rather than only as a list of designated features.

***Mostly covered:** The Scoping Request includes designated and non-designated heritage assets, and takes account of setting impacts, cumulative impacts, historic land-use relationships, intervisibility, and communal value. This is an area, therefore, where Olsen largely recognises the relevant interactions. The remaining gaps are that heritage is subject to limiting geographical scope assumptions and it is still framed primarily through asset-led assessment rather than clearly identifying the heritage character of the moor itself as an integrated receptor.*

4.4.2 On-site and nearby heritage features in moorland context: assessment of historic routes, prehistoric landscape features, rock-art or carvings, burial features,

³⁰ See Appendix H for examples of landscape, recreation, and destination viewpoints identified through community submissions.

archaeological remains, prehistoric settlement and stone features, and how the moorland setting contributes to their significance.

***Mostly covered:** The Scoping Request identifies on-site and nearby heritage assets and proposes assessment of direct effects, setting, intervisibility, archaeological potential, and non-designated heritage value. The remaining gap is whether the assessment will give sufficient weight to how the moorland setting contributes to the significance of those heritage assets.*

4.4.3 Wider heritage setting and intervisibility: assessment of the proposed site as part of the landscape setting of heritage assets beyond it, including intervisibility with Barnard Castle, Scargill Castle, Dalton Mill, Bowes Castle, Bowes Museum, Raby Castle, and other relevant assets.³¹

***Mostly covered:** The Scoping Request includes assessment of wider heritage setting, intervisibility, predicted turbine visibility, distance, direction, and whether long-distance views contribute to the significance of heritage assets beyond the site. The remaining gap is whether the assessment will give sufficient weight to the collective heritage-character relationship between the moor and surroundings, rather than an asset-by-asset analysis.*

4.4.4 Historically meaningful routes and places: assessment of routes and places whose heritage value depends on continuity of use, setting, and local memory, including examples such as the Funeral Walk between Newsham and Barningham.

***Minimally covered:** The Scoping Request includes some route-related heritage assets, such as waymarkers and boundary features. However, it does not clearly identify historically meaningful routes whose heritage value depends on social and geographical continuity, such as the Funeral Walk between Newsham and Barningham.*

4.4.5 Access roads and grid connection: assessment of how new access roads, grid connection, and associated infrastructure may affect heritage setting, historic routes, archaeological features, and the wider historic landscape.

³¹ See Appendix I for examples of named heritage and archaeological places identified through community submissions.

Minimally covered: Whilst access roads are included in the Scoping Request, grid connection and associated infrastructure are not, and there is no obvious assessment of how these will collectively affect local and wider heritage assets and historic settings.

4.5 Residential Character

4.5.1 Overall residential setting: assessment of residential character as the combined experience of dwelling, setting, external amenity, outlook, peace and quiet, dark skies, wildlife, and rural character.

Not identified: The Scoping Request includes residentially relevant matters across separate topic chapters, but does not identify overall residential setting as an integrated receptor shaped by the combined experience. This identifies a locally evidenced pathway by which residents may be affected, notwithstanding Olsen's proposal to scope out socio-economic effects on the local population on the basis that no clear pathway has been identified.

4.5.2 Gardens, shared spaces, and external amenity: assessment of day- and night-time enjoyment of gardens, outdoor spaces, and nearby shared spaces valued for ambience and community use.

Minimally covered: The Scoping Request includes some relevant residential amenity, visual, noise, shadow-flicker, and lighting topics, but does not clearly assess gardens, outdoor domestic spaces, or nearby shared spaces as places whose day- and night-time use, ambience, and community value may be affected.

4.5.3 Residential restorative value: assessment of the residential environment as a source of peace, escape, psychological restoration, and day-to-day lived benefit, not only as visual or acoustic amenity.

Minimally covered: The Scoping Request recognises some related visual amenity, access, noise, shadow-flicker, and community-identity issues, but does not clearly assess the residential environment as a source of peace, escape, psychological restoration, and day-to-day lived benefit.

4.5.4 Human health: assessment of health sensitivity and wellbeing where community evidence identifies residential setting, sleep, stress sensitivity, and disturbance vulnerability as relevant to physical or mental health.

Minimally covered: The Scoping Request recognises some health-related determinants through separate topic chapters, but human health is scoped out as a separate assessment topic. This is an important receptor issue being fragmented across different chapters.

Although individual health-related determinants can be assessed under separate technical headings, human health and wellbeing are emergent receptor-level outcomes that cannot be captured by assessing the separate aspects alone.³² A residential receptor might fall below the threshold for significant effect when each determinant is assessed separately, yet still experience a material health or wellbeing effect from the interaction of disturbance, sleep, stress sensitivity, residential setting, tranquillity, and loss of restorative environment.

Given that over 25% of responses identified health sensitivity as an issue, and the community evidence that health and wellbeing are among the reasons people live in the area, the ES should assess these matters as part of the residential receptor, without needing to assert a specific medical outcome.

4.5.5 Application of multi-pathway disturbance to homes: assessment of the residential effects of the pathways identified in 4.2, including how the combined effect varies by location, distance, exposure, and residential use.

Partly covered: The Scoping Request assesses several relevant pathways affecting residential or noise-sensitive receptors, including visual effects, noise, shadow flicker, lighting, traffic, and construction effects. However, it

³² See, for example, Jimenez et al. (2021), *Associations between Nature Exposure and Health: A Review of the Evidence*, which reviews evidence linking nature exposure with cognitive function, blood pressure, mental health, physical activity, and sleep. This article is not suggested as evidence for or against the wind farm, but to support the point that human health and wellbeing can be affected by environmental conditions and should not be fragmented into discrete topics. Available online at: <https://pmc.ncbi.nlm.nih.gov/articles/PMC8125471/>

does not clearly apply the multi-pathway disturbance issue to homes as integrated residential receptors.

4.5.6 Older buildings close to construction traffic: assessment of construction-traffic effects on listed buildings and private houses, especially older buildings close to the proposed route that may have little or no modern foundations, including whether Historic England should be consulted.

***Minimally covered:** The Scoping Request includes construction traffic, route modifications, construction noise and vibration, and heritage assessment. However, it does not clearly assess the specific risk to older listed buildings and private houses close to the proposed construction route, including buildings with little or no modern foundations, nor the need to consult Historic England where local knowledge indicates potential vulnerability.*

4.6 Ecological Interdependence

4.6.1 Ecological conditions as a receptor: assessment of the vulnerable and interconnected conditions that sustain the ecosystem, rather than only separate assessment of individual habitats or species.

***Partly covered:** The Scoping Request includes ecology, ornithology, priority habitats, protected species, peatland ecology, and ecological receptors. It also recognises there are interrelationships with other functional topics. However, Olsen addresses this by stating that the ecology chapter “should be read alongside the following chapters”,³³ before listing hydrology, geology, ornithology, and climate change. The Scoping Request does not clearly identify the integrated receptor comprised of the interconnected ecological conditions and systemic effects that sustain the ecosystem and the habitats and species within it.*

4.6.2 Species, habitats, and movement: assessment of the ecological interdependence of ground-nesting birds, waders, raptors, bats, deer, insects,

³³ Scoping Report, 7.1.3.

amphibians, notable flora, and bird movement across the moors in relation to the habitats and conditions they depend on.

Partly covered / partly scoped out: *The Scoping Request includes ornithological survey work and refers to species, habitats, and ecological receptors. The assessment does not appear to adequately consider ecological interdependence and several bird species have been scoped out.*

However, the relationship between the different ornithological findings is not clear. For example, the Vantage Point (VP) survey observed 16 curlew flights³⁴ but elsewhere the Scoping Report notes the observation of flocks of curlew.³⁵ Community observations are more consistent with a higher level of curlew activity – e.g. see Section 3.6, footnote 16. Because curlew are a locally prominent and readily observed species, any material discrepancy between formal survey findings and local observations should be explained.

This may have implications for other bird species proposed to be scoped out. Until the apparent curlew discrepancy is explained, the Scoping Opinion should be cautious about accepting exclusions that rely on similar survey interpretation, especially where local observations, suitable habitat, or ecological connectivity provide a basis for questioning absence or low activity.

4.6.3 Wider ecological geography: assessment extending beyond the proposed site to connected conservation areas, sphagnum bogs, the Stang Road corridor, Newsham Tarn, water-fed habitats around Newsham, Scargill, Helwith, and the wider Barnard Castle environs.

Partly covered: *The Scoping Request's wider ecology study area appears to include most of the locations identified by community evidence. However, it is not clear that the assessment will treat them as part of a connected ecological geography, rather than as separate designated sites, habitats, species records, or survey areas.*

³⁴ Scoping Report, 8.3.26 (survey totalling 144 hours conducted between April 2022 and February 2024).

³⁵ 8.3.47.

4.6.4 Conservation and nature-recovery context: assessment of the relation between the proposed development and wider initiatives – current and emerging – to restore nature, habitats, biodiversity, and wild-landscape character across the north of England, including work in the Tees-Swale and North Pennines landscape and the potential contribution of nearby areas to Golden Eagle recovery.

***Partly covered:** The Scoping Request refers to Local Nature Recovery Strategies, biodiversity policy, ecological datasets, potential nature-recovery areas, and landowner biodiversity or environmental schemes. However, it is not clear that the ES will assess how the proposed development relates to wider conservation and nature-recovery trajectories across the Tees-Swale and North Pennines landscape.*

4.7 Agricultural and Land-Managed Use

4.7.1 Agricultural use and rural land management: assessment of the effect on farms, grazing land, crops, livestock areas, gamekeeping land, conservation-managed land, and other managed rural land.

***Not identified:** The Scoping Request includes relevant matters across separate topic chapters, including ecology, hydrology, access, traffic, peat, and land-use context. However, it does not identify an integrated receptor concerned with the practical continuity of use and management.*

4.7.2 Water, access, habitat, traffic, and land condition together: assessment of how water reliability, access changes, habitat disturbance, construction traffic, infrastructure corridors, and changes to land condition may combine to affect agriculture and land management in practice.

***Partly covered:** The Scoping Request includes several relevant topics but does not clearly assess how these pathways may combine to affect the practical, day-to-day management of agriculture and land.*

4.7.3 Farm-business and livestock management: assessment of effects on sheep and cattle breeding, livestock movement, livestock water points, pasture, field access, and other farm operations.

Minimally covered: The Scoping Request includes some relevant topics but does not clearly assess the practical and socio-economic impacts on farm operations. This assessment should include livestock welfare, business continuity, and effects on any associated farm-business facilities.

4.7.4 Gamekeeping and conservation management: assessment of effects on gamekeeping, estate management, conservation management, and the continuity of existing land-management practices.

Minimally covered: The Scoping Request includes some relevant ecology, habitat, land-use, access, and construction topics, but does not clearly assess effects on the practical continuity of gamekeeping, estate management, and conservation-management practices.

4.7.5 Moorland burning and heather management: assessment of air-quality baseline issues associated with moorland burning or heather management.

Minimally covered: The Scoping Request refers to heather, grouse-moor management, controlled burning, grazing, and particulate-matter standards in separate contexts. However, it does not clearly assess these practices as an air-quality baseline issue, or whether the proposed development could alter the frequency or pattern of burning and thereby affect particulate exposure.

4.8 Recreation and Destination Use

4.8.1 Recreation and destination use as a receptor: assessment of the site, surrounding area, and wider locations as places people travel through, visit, and value for recreation and destination use, not only as isolated rights-of-way or visitor assets.

Not identified: The Scoping Request includes relevant matters across separate topic chapters, including rights-of-way, visual receptors, tourism, and landscape/visual effects. However, it does not identify recreation and destination use as an integrated receptor concerned with how the site, surrounding area, and wider locations are travelled through, visited, and valued.

4.8.2 Local and long-distance recreational use: assessment of walking, cycling, open-access use, scenic climbing points, landscape photography, and long-distance routes.

Partly covered: The Scoping Request includes public rights of way (but see 4.12.2), National Cycle Routes, National Trails, long-distance walking routes, recreational visual receptors, tourism assets, and non-motorised road users. However, it is not clear that the assessment treats local and long-distance recreational use as a practical and experiential receptor rather than as separate access, visual, traffic, and tourism matters.

4.8.3 Bridleways, riding, and access deterrence: assessment of horse-and-rider behavioural responses to turbines, lighting, noise, moving shadows, and construction traffic.

Partly covered: The Scoping Request identifies PRowWs, non-motorised users, and bridleways. It is not clear that the ES will assess the various factors affecting horse-and-rider safety. Also, it is not clear whether the ES will assess the extent to which perceptions of safety could deter use of the moor and displace riders onto other routes.

4.8.4 High wind, ice, and blade-shedding safety: assessment of recreation and access safety during high winds and icy conditions, including the potential shedding of ice from turbine blades.

Partly covered: The Scoping Request identifies turbine safety measures for extreme weather, including high winds and icing. However, it is not clear that the ES will assess recreation and access safety for walkers, cyclists, horse riders, and other users during high-wind or icy conditions.

4.8.5 Tourism, hospitality, and local destination effects: assessment of local tourism and hospitality businesses whose visitor draw depends on landscape character, tranquillity, habitat quality, conservation value, rural access, and the distinctive upland experience, rather than relying only on national or regional research.

Partly covered: The Scoping Request proposes to scope out socio-economics and tourism, and address the subject in a standalone report, on

the basis that no clear pathway has been identified for significant adverse effects. However, the community evidence identifies plausible tourism and hospitality pathways that should be considered at scoping, especially where visitor draw depends on the combined qualities of landscape, tranquillity, conservation value, rural access, and distinctive upland experience.

It is not clear if Olsen's future report – whether in or out of the ES – will assess potential visitor displacement away from local tourism and hospitality businesses whose visitor draw depends on the combined qualities of the distinctive upland experience.

4.8.6 Guest confidence, insurability, and business viability: assessment of whether actual or perceived effects on landscape, access, tranquillity, or safety could affect hospitality or visitor-facing businesses.

***Minimally covered:** The Scoping Request identifies tourism as a topic to be covered in a separate report, but does not clearly assess effects on guest confidence, insurability, or the viability of hospitality or visitor-facing businesses.*

4.8.7 National trails and recognised destinations: assessment of effects on Pennine Way and Coast to Coast National Trail users, North Pennines National Landscape and UNESCO Geopark, Yorkshire Dales National Park, Nidderdale National Landscape, Teesdale, and individual locations such as Tan Hill Inn, Scargill Castle, Helwith tea garden, Barnard Castle, Reeth, and other relevant visitor destinations.³⁶

***Partly covered:** The Scoping Request identifies National Trails, long-distance routes, designated landscapes, recreational visual receptors, and tourism assets. However, it does not clearly assess the combined effect on recognised trails and visitor destinations as part of a connected recreation and destination network whose value depends on the wider upland experience.*

³⁶ See Appendix H for examples of wider landscape, recreation, and destination viewpoints identified through community submissions.

4.9 Rural Roads and Access Network

4.9.1 Rural access network as a receptor: assessment of the wider rural road and access network serving villages, farms, dispersed properties, businesses, and visitors, rather than only individual road links.

***Not identified:** The Scoping Request includes transport, access, construction traffic, abnormal loads, and road-user assessment, but does not identify the wider rural access network as an integrated receptor serving the area.*

4.9.2 Constrained/fragile road conditions: assessment of the network of narrow lanes, single-track roads, verges, passing places, flood- and snow-prone routes, potholes, weak edges, and difficult passing conditions.

***Partly covered:** The Scoping Request recognises some relevant constraints, including single-track roads, access to homes and farms, route configuration, route modifications, and passing places. However, it does not clearly assess the extent to which local road fragility may deteriorate under construction and access pressures.*

4.9.3 Abnormal construction, access, and grid traffic: assessment of abnormal loads, HGVs, construction traffic volume, and grid-connection traffic on the rural road network.

***Partly covered:** The Scoping Request includes construction traffic, operational access, abnormal loads, HGV movements, site access, and route modifications. However, grid-connection traffic is not included, omitting a potentially major infrastructure traffic pathway. Therefore, the overall burden on the rural road network is not clearly assessed.*

4.9.4 Cumulative pressure with A66 works and accidents: assessment of how project traffic may combine with A66 dualling works and overspill from A66 accidents.

***Partly covered:** The Scoping Request recognises the A66 dualling works as a relevant future-baseline issue. However, it does not clearly assess how project traffic may combine with A66 accident overspill and existing diversionary pressure on the rural road network.*

4.9.5 Mixed road use: assessment of effects on everyday access, commuting, agricultural movement, walking, cycling, horse-riding, driving, and shared roadside community use.

***Mostly covered:** The Scoping Request recognises relevant road-user groups and access functions, including non-motorised users, access to homes and farms, construction traffic, abnormal loads, and general road-user effects. The remaining issue is whether the interaction between different users on constrained rural roads is fully assessed.*

4.9.6 Flooding and road-related property risk: assessment of increased flooding or drainage changes on road conditions and nearby houses.

***Minimally covered:** The Scoping Request includes flood-risk, drainage, hydrology, access, and transport topics. However, it does not clearly assess whether increased flooding or drainage changes could worsen local road conditions or put nearby houses at risk as part of the rural access-network assessment.*

4.9.7 Routes that may be affected: assessment of potentially affected routes including Barningham, Helwith, Newsham, Barnard Castle, the Stang Road corridor, Whipperdale Bank, Stang Lane, Moor Lane, and other relevant minor-road corridors.

***Mostly covered:** The Scoping Request assesses selected access routes and key transport links. The remaining issue is whether all minor-road corridors and route examples have been considered where they may be affected by displacement, overspill, construction traffic, or associated infrastructure.*

4.10 Operational Environment Uses

4.10.1 Operational environment: assessment of the area as a flexible operational environment, not only as landscape, amenity, recreation, aviation, lighting, noise, or military activity.

***Not identified:** The Scoping Request includes relevant matters across separate topic chapters. However, it does not identify the area as a flexible operational environment whose suitability may depend on the combination of*

open upland airspace, darkness, visibility, and the absence of large-scale vertical infrastructure or intrusive lighting.

4.10.2 MOD and RAF activity: assessment of potential effects on military training land, RAF low-flying activity, telecoms, radar, signal interference, and related MOD operations.

***Mostly covered:** The Scoping Request identifies MOD and RAF matters, including RAF Leeming, military low-flying, Feldom Range, radar, telecommunications, and potential obstruction or signal-interference effects. The remaining gap is whether the assessment will capture locally observed operational use (vs desk-based scoping) and any knock-on disturbance or displacement effects of the development.*

4.10.3 Feldom Range night training: assessment of effects on night training, flare use, darkness, visibility, and the interaction with turbine lighting.

***Minimally covered:** The Scoping Request identifies Feldom Range and military low-flying/night low-flying context, but does not clearly assess Feldom Range night training, flare use, darkness, visibility, or the interaction with turbine lighting as a locally specific operational-use issue.*

4.10.4 Private helicopters and paramotors: assessment of locally reported helicopter and paramotor use.

***Not identified:** The Scoping Request includes aviation and safeguarding matters but does not identify locally reported private helicopter and paramotor use, or assess how such use may depend on open upland airspace, visibility, and the absence of large-scale vertical infrastructure.*

4.10.5 Displacement effects: assessment of whether affected operational activity could be displaced elsewhere and create indirect disturbance for residents.

***Not identified:** The Scoping Request does not clearly assess whether affected operational activity could be displaced elsewhere and create indirect disturbance for residents.*

4.11 Other Locally Identified Receptors

4.11.1 Newsham Village Green: assessment of construction-traffic and increased-traffic effects on Newsham Village Green as a shared community space used by children and residents, including interim risks before any alternative access route is available.

***Not identified:** The Scoping Request includes construction-traffic, access, and road-safety assessment, but does not identify Newsham Village Green as a shared community space whose use by children and residents may be affected by construction traffic or increased traffic, including interim risks before any alternative access route is available.*

4.11.2 Overhead services in Newsham: assessment of effects of oversized construction traffic on telephone, broadband, and power cables crossing the road through Newsham, and the residential and business services that depend on them.

***Not identified:** The Scoping Request includes construction-traffic, abnormal-load, access, and road-safety assessment, but does not identify overhead telephone, broadband, and power cables crossing the road through Newsham, or the residential and business services that depend on them, as receptors potentially affected by oversized construction traffic.*

4.11.3 Travellers at Rokeby Inn / Smallways junction: assessment of effects on the established stopping point at the Rokeby Inn / Smallways junction of the A66.

***Not identified:** The Scoping Request includes A66 access, construction-traffic, and road-safety assessment, but does not identify the established stopping point at the Rokeby Inn / Smallways junction as a locally specific receptor whose safety, disturbance, access, or legal implications may need assessment.*

4.11.4 UNESCO Global Geopark status: assessment of the North Pennines National Landscape as a UNESCO Global Geopark.

***Not identified:** The Scoping Request recognises the North Pennines in landscape, visual, heritage, tourism, and ecological contexts. However, it does not appear to identify the North Pennines National Landscape as a UNESCO*

Global Geopark, nor assess its wider interpretive and educational value rather than only separate landscape, heritage, tourism, or ecological effects.

4.11.5 Film and television landscape settings: assessment of locations such as Healaugh Crag where the open landscape has value as a cultural backdrop, including for historical drama.

***Not identified:** The Scoping Request recognises film and television locations only as a general regional tourism theme, but does not identify specific local landscape settings such as Healaugh Crag where the open landscape may have value as a cultural backdrop, including for historical drama.*

4.11.6 Peat and carbon storage: assessment of peat as a carbon store, including potential carbon release from the proposed development, access works, and grid connection.

***Partly covered:** The Scoping Request includes carbon and climate-change assessment and recognises that peat may act as a carbon store. Olsen provides an initial assessment suggesting that the moor may be a carbon emitter. However, that peat/carbon assessment cannot be relied upon until apparent discrepancies between the official Natural England peat mapping, Olsen's peat-depth mapping, and Olsen's habitat classification have been reconciled (see 4.12.1). It is also not clear that potential carbon release from access works and grid connection will be fully assessed.*

4.11.7 Other locally identified receptors: assessment of any remaining locally significant receptors not captured either by Olsen's standard categories or by the present non-comprehensive exercise. Public consultation should provide a clear opportunity to identify specific places, uses, or pathways of importance that may otherwise be overlooked.

***Not identified:** The Scoping Request uses standard topic headings and therefore may not identify locally specific receptors, uses, or pathways that do not fit neatly within those categories. Public community consultation should provide a clear opportunity to identify such receptors, which should then be checked against the ES scope so they are not lost under generic headings.*

The design of the first public consultation does not appear to facilitate such feedback.

4.12 Consequences of Narrow Scoping

If the Scoping Opinion reflects a narrow geographical scope, or a topic-by-topic approach, without requiring targeted assessment of the integrated receptors identified above, there may be several implications, ranging from an inadequate Environmental Impact Assessment to insufficient monitoring and mitigation should the development go ahead. For example, later community consultation should not be treated as a safeguard against omissions from scoping if that consultation is shaped by a relatively narrow set of assumptions and a design focus. In that situation, the community may not be given adequate opportunity to identify receptors and pathways missing from the assessment framework. Therefore, any significant omissions from the Scoping Opinion are less likely to be identified and corrected at a later stage.

Community feedback to the present author from the first consultation has already indicated possible consequences of narrow scoping, creating the risk of evidence and assessment gaps at later stages. The following list reflects the main issues raised and shows how a narrow scoping frame can affect the evidence available for the Environmental Impact Assessment.

4.12.1 Peat-map discrepancies: reconciliation of differences between Natural England's 2025 peat mapping, Olsen's peat-depth mapping, and Olsen's habitat classification, with a clear explanation of the peat baseline used for assessment.

***Unclear / possible discrepancy:** Natural England's mapping appears to show widespread peat of 30 cm and above across much of the relevant moorland area, and Olsen's habitat classification acknowledges extensive blanket bog habitat. However, Olsen's peat-depth mapping appears to show more extensive areas below 30 cm. The Scoping Opinion should require these apparent discrepancies to be reconciled, including any differences in peat definition, survey resolution, field-sampling method, remote-sensing method, classification threshold, management history, or mapping*

assumption, with a clear explanation of the peat baseline used for assessment and how it can be independently verified.

4.12.2 Public rights-of-way classification in consultation material: explanation of why community consultation material showed affected routes under a generic rights-of-way category, despite the legal and practical differences between footpaths, bridleways, restricted byways, and other route types.

Partly covered / consultation discrepancy: *The Scoping Request recognises distinctions between public rights-of-way categories, but the public consultation map appears to show routes under a generic rights-of-way category (see Appendix E). This distinction is important for community consultation because different route types involve different users, vulnerabilities, and impact pathways. For example, bridleways raise particular issues for horse-and-rider safety when using routes on the site as well as the surrounding rural road network, during construction and operation.*

The Scoping Opinion should seek an explanation of why undifferentiated route classifications were considered suitable for community consultation, given that different route types involve different users, vulnerabilities, and impact pathways.

4.12.3 Representative ZTV viewpoints: expansion of viewpoints to include local settlements, dispersed residential receptors, cultural sites, heritage viewpoints, national trails, and other locations for which the current list may not provide a properly representative viewpoint.

Partly covered: *The Scoping Request includes ZTV mapping and 18 representative viewpoints. However, the current viewpoint selection does not appear to include a sufficient range of local settlements, dispersed residential receptors, cultural sites, heritage viewpoints, national trails, and other community-identified locations needed to test whether the selected viewpoints are properly representative. For example, the largest settlement nearby (Newsham) has been excluded, as have other close hamlets such as Dalton, Gayles, and several others. Settlements and dispersed residential receptors are different from panoramic viewpoints in many ways, the former being part of everyday lived experience.*

Olsen's list does not include Great Whernside or Little Whernside, mountains that span the Yorkshire Dales National Park and Nidderdale National Landscape. As they are a major feature of the skyline when observed from the proposed site, to investigate the reverse perspective a line-of-sight analysis was undertaken which suggests that the full height of some turbines may be visible from certain points of Great and Little Whernside. They appear to represent a key receptor not necessarily captured by other viewpoints. Also, there are few viewpoints along the Pennine Way or Coast-to-Coast National Trails, whereas community feedback suggests the proposed turbines will likely be visible from many places along those paths.

Some viewpoints are included that do not seem to provide the most representative perspective. For example, the viewpoint selected in Barnard Castle is from the Cricket Ground, which is not the highest part of Barnard Castle, is surrounded by buildings in a dense residential area, and is on the opposite side of the town centre to the proposed site. Whilst the Cricket Ground is acceptable as a viewpoint, the character of the area is not fully representative. There are closer and potentially more sensitive locations that may need to be represented in the viewpoint selection, including heritage sites such as Barnard Castle (i.e. the castle itself), rather than relying on the Cricket Ground viewpoint to represent the town as a whole.

Also, a provisional community-generated ZTV analysis (see Appendix L), which broadly agrees with Olsen's mapping, makes the regional extent of theoretical visibility more apparent. Combined with the community observations concerning Great and Little Whernside and the locations listed in Appendix H, this reinforces the need to test whether the selected viewpoints adequately represent potential effects across protected landscapes, national trails, heritage/destination viewpoints, and long-distance recreational receptors.

The Scoping Opinion should require both a clear regional presentation of ZTV findings and more comprehensive coverage of potentially affected receptors in the selected viewpoints, including receptors beyond 20 km where ZTV or line-of-sight evidence indicates potential visibility.

4.12.4 Grid connection deferral: inclusion of grid connection effects in the ES where connection infrastructure is necessary for the wind farm to operate and may give rise to substantial environmental effects, rather than deferring those effects to a later process after the DCO decision.

***Minimally covered / inadequately deferred:** The Scoping Request acknowledges that grid connection is not included in the current application and will be promoted separately by a third party. However, as the Scoping Request also makes clear, grid connection is essential and may involve substantial environmental effects, potentially over a considerable distance.*

Olsen presents a legal argument for deferring consideration of those effects to a third party's application. That argument does not remove the scoping problem: Olsen accepts that the grid connection is functionally interdependent with the development and "capable of forming part of the Project for EIA purposes";³⁷ yet Olsen proposes that the decision-maker should determine the wind farm DCO without assessment of a necessary and potentially environmentally-significant infrastructure pathway.

If those effects are deferred until after the DCO, the ES may be incomplete because the decision-maker would not be assessing the likely environmental effects of the operational project as a whole. The Scoping Opinion should therefore require the ES to include grid connection effects, so far as they can reasonably be identified, where connection infrastructure is necessary for the wind farm to operate, even if the detailed route, method, or approval process has not yet been finalised.

4.12.5 Grid connection imagery: inclusion of a reasonable representation of grid connection impacts in the ES.

***Unclear representation / scoped out:** For example, Appendix F shows an image from Olsen's consultation document that defers grid connection to a later project, but also presents an image showing relatively small wooden poles when much larger pylons may be required. That is, the consultation*

³⁷ Appendix 2A, 1.6.1.

presents a visual representation of grid infrastructure whilst simultaneously deferring the actual route/method – which may or may not be different – to a later process. If what is presented to the community in the consultation is quite small, relatively unobtrusive, and of a scale commensurate with existing infrastructure, then the feedback is unlikely to identify the receptors and pathways that are relevant should the actual infrastructure be much bigger.

In the absence of knowing the method and route for the connection to the grid, the use of images such as these wooden poles may further weaken any later reliance on the consultation to correct earlier scoping errors or to act as evidence of community views. It suggests that Olsen’s consultation process may itself generate an incomplete understanding of what is being scoped.

4.12.6 Consultation limitations: consultation should not be assumed to cure omissions in the Scoping Request unless residents are given sufficient information and a clear opportunity to identify missing receptors, pathways, and mitigation questions relevant to the Environmental Statement.

***Not identified / scoping safeguard:** It should not be assumed that deficiencies in scoping can be corrected through later consultation unless that consultation is designed to elicit receptors and pathways based on local knowledge. Public-facing scoping methodologies, such as those described by the International Institute for Sustainable Development,³⁸ indicate the kind of open, evidence-gathering process that may be needed to identify locally understood receptors, uses, dependencies, and impact pathways.*

The Hope Moor consultation does not appear to have used that kind of open scoping methodology. The public questionnaire is framed primarily around project refinement and Olsen’s existing categories, rather than giving residents a fully open opportunity to identify what matters, why it matters, and how receptors may be affected. Community feedback also suggests that information about potential visual and noise effects, mitigation, and turbine

³⁸ See: <https://www.iisd.org/learning/eia/wp-content/uploads/2016/05/Public-participation.pdf>, pp. 1-2.

scale may not have been sufficient to enable informed identification of receptors, pathways, and mitigation questions. ³⁹

4.12.7 Pre-grid commissioning and temporary power: assessment of whether turbines could require temporary power generation, battery systems, diesel generators, or other auxiliary systems for commissioning, testing, safety systems, or operation before grid connection is available.

***Unclear / not identified:** The Scoping Request includes commissioning and testing, but it is not clear whether the ES will assess any temporary power arrangements that may be required if turbines are constructed or commissioned before grid connection is available. The Scoping Opinion should require clarification of whether temporary arrangements are likely to be required, for how long, and what the environmental impacts of such arrangements will be.*

4.12.8 Newsham Conservation Area: clarification of whether Newsham Conservation Area and associated heritage assets have been included in the cultural heritage baseline and assessed for relevant pathways, including setting, construction traffic, vibration, older buildings, residential character, and historic setting.

***Unclear / possible omission:** Newsham is a designated Conservation Area and appears to be within the relevant cultural heritage distance threshold. However, it does not appear to be listed in the cultural heritage appendices reviewed. The Scoping Opinion should require confirmation that Newsham Conservation Area and associated heritage assets have been included in the ES baseline and assessed for relevant pathways, including setting, construction traffic, vibration, older buildings, residential character, and historic setting.*

4.12.9 Long Green telecommunications mast: verification of the location and distance of the Long Green mast from the Scoping Boundary, and whether telecommunications effects can properly be scoped out.

³⁹ See Appendix J for an example of consultation imagery that community feedback considered to underrepresent turbine scale.

Unclear / possible discrepancy: *The Scoping Request identifies the Long Green telecommunications mast but states that it is approximately 1.4 km east of the Scoping Boundary. Local checking – using both Google satellite view measurement and direct observation – indicates that the mast is approximately 75 m from the Scoping Boundary. The Scoping Opinion should require verification of the mast location, distance from the Scoping Boundary, associated links, and whether mobile coverage to the intended service area may be affected.*

4.12.10 Effect of fixed scoping boundaries on magnitude and significance:

assessment boundaries should not be applied in a way that excludes receptors whose omission may reduce the apparent magnitude or significance of effects.

Scoping risk: *Several topic areas appear to rely on fixed geographical or category-based boundaries when determining what is scoped in or out, including heritage assets, private water supplies, shadow flicker, air quality, and other receptors. Standard screening boundaries may be appropriate starting points, but they should not become conclusive exclusions where site-specific evidence – including evidence provided through community input – indicates a plausible pathway beyond them.*

The risk is not only that individual receptors may be missed. It is also that the apparent magnitude and significance of impacts may be understated if the assessment excludes relevant receptors, pathways, interrelationships, or baseline conditions. Where affected receptors are omitted or scoped out, monitoring, mitigation, trigger thresholds, and remedial responsibilities may also be absent. The Scoping Opinion should therefore require Olsen to justify fixed-distance or category-based exclusions where community evidence or site-specific conditions indicate that affected receptors may fall outside the proposed scope.

4.12.11 Evidential basis for scoping out: transparent justification of effects that are judged unlikely, negligible, not anticipated, or adequately controlled by embedded mitigation.

Not identified / scoping risk: *Professional judgement is inevitable in environmental assessment. However, where it is used to exclude species,*

receptors, pathways, or other matters from detailed ES assessment, the Scoping Opinion should require the evidential basis for those exclusions to be made explicit. This should include the assumptions made, survey limitations, local records considered, embedded mitigation relied upon, and any consultee or stakeholder input, so that scoping-out decisions can be scrutinised by PINS, consultees, and affected communities.

Conclusion

The above discrepancies became apparent as a result of the comparison of the information provided by Olsen during their first community consultation and Scoping Request with supplementary information provided to the author by the community during this independent scoping consultation exercise. There has not been sufficient time to review the full Scoping Request technical information for consistency with community knowledge. This section should therefore not be viewed as a comprehensive list of discrepancies.

For PINS, the significance of these discrepancies is that they call into question whether the consultation process can generate the local evidence needed to support a complete and reliable EIA, so consultation should not be assumed to cure omissions in the Scoping Request. If the Scoping Opinion reflects the same narrow, functionally oriented frame as presented in Olsen's Scoping Request and stage one consultation materials, important receptors and pathways may remain outside the assessment and not be corrected through community feedback even though consultation has taken place. The community evidence in this report is submitted so that as many of those receptors as possible can be included at the scoping stage, before the assessment frame becomes difficult to correct.

Appendix A – Methodology

Most of the information for this community consultation was gathered during March and April 2026. The methodology used was:

1. An online questionnaire was created to capture receptors and pathways.⁴⁰
2. A short, explanatory video was produced, which also provided the link to the questionnaire.⁴¹
3. The video was publicised by a local county councillor, two local parish councils, and the Hope Moor Wind Farm Action Group.
4. Submissions were closed on 19th May 2026 in anticipation of the Scoping Request being due for publication.
5. The data was downloaded (235 submissions).
6. The data was cleansed, including:
 - the removal of incomplete or duplicate entries (33);
 - receptor descriptions were edited to remove language that expressed support for the wind farm (1) or objection to it (77).
7. Statistical factor analysis and AI-assisted thematic analysis were used to identify recurring themes.
8. The themes identified through the analyses were reviewed alongside the individual submissions and relevant public documents, maps, consultation materials, and Olsen documentation to structure Sections 1 to 3 of this report.⁴²
9. The results were compared with the Scoping Request to identify differences, with AI assistance to analyse Olsen's documentation.
10. The results of the comparison were used to write Section 4, after which the report was reviewed and finalised.

⁴⁰ <https://myers.co/hopemoor>

⁴¹ <https://myers.co/receptorvideo>

⁴² The detail of specific house and farm names is not included in the report for two reasons. Firstly, it avoids giving the false impression that this consultation was a comprehensive exercise. Less than 4% of residents in the 10 local parishes included in Olsen's liaison group answered the questionnaire. Secondly, a small minority of respondents expressed privacy concerns, including some who expressed concern about landlords becoming aware of their participation. Presenting area level information preserves privacy whilst still identifying the receptor classes and locations relevant to scoping.

Appendix B – Example effects of interactive receptor omissions

This appendix shows, for each receptor class, a practical type of effect that may be missed, split up, or understated if assessment is confined to separate functional topics – such as hydrology, noise, ecology, landscape, transport, or tourism – or locally identified receptors are not included. The practical omission can occur in three ways: a receptor is not identified at all; it is identified only in generic form without regard to location, use, or setting; or it is split across separate chapters so that no chapter assesses the actual integrated effect or local impact. This means that an Environmental Statement can appear to have covered all the topics whilst still being substantively incomplete.

Receptor	Organising principle	Example of what may be missed/misrepresented
3.1 Upland Water Interdependence	Dependence on an integrated upland hydrological system that affects, and is affected by, multiple receptors.	A private spring may remain technically present but become less reliable because peat disturbance, altered drainage, runoff, water-table change, and contamination pathways interact across the whole system. The Dousgill example captures this clearly: a spring that has dried up only twice in four decades may still suffer a significant effect if the reliability of supply changes, even if functional assessments of hydrology, peat, and water quality identify no separate impacts.
3.2 Multi-Pathway Disturbance	Exposure of the same receptors to multiple concurrent pathways whose combined burden may not be captured if assessed separately.	A dwelling may sit within individually acceptable ranges for noise, shadow flicker, lighting, dust, and traffic, yet still experience a qualitatively different burden because those disturbances occur together, and in some cases interact with an already intermittent baseline of military disturbance. A functional approach could record each pathway separately and miss the cumulative lived effect.

Receptor	Organising principle	Example of what may be missed/misrepresented
3.3 Immersive Landscape Experience	The moor as a whole landscape experienced through openness, remoteness, tranquillity, dark skies, nature, and cultural depth.	A walker or resident may lose the combined restorative experience of the upland environment. If landscape, lighting, noise, archaeology, and ecology are each assessed in their own chapter, the Environmental Statement may never assess the change or reduction in the immersive experience as such.
3.4 Heritage Character	Heritage significance shaped by setting, intervisibility, and the wider historic landscape of the moor.	The effect on a heritage receptor may not be physical damage to a monument, but loss of significance because the open moor no longer contributes to the asset's setting or to its relationship with other heritage features. The Funeral Walk is an example: its significance is not simply one of path use, and could be missed if treated only as access, recreation, or transport.
3.5 Residential Character	The dwelling together with its wider setting, external amenity, outlook, and day- and night-time environmental conditions.	A residential property may experience a combined effect on external amenity and ordinary domestic life through night lighting, flicker, episodic noise under real conditions such as open windows, topography, temperature inversion, or the introduction of large-scale energy infrastructure into the visual setting. A functional approach may note each pathway separately but still fail to assess the effect on the residential setting as it is actually lived.
3.6 Ecological Interdependence	Habitats and species whose significance depends on vulnerable ecological conditions, including disturbance regime, hydrology, darkness, and landscape context.	The impact on the ecosystem may not be adequately assessed if ecology is treated in a compartmentalised way, such as considering species separately from habitat or hydrology. The real effect may lie in deterioration of the conditions that support breeding, feeding, and movement across the moor, so that no single chapter captures the deterioration of the ecosystem on which those species depend.

Receptor	Organising principle	Example of what may be missed/misrepresented
3.7 Agricultural and Land-Managed Use	Practical use and management of land for farming, grazing, livestock, and conservation management.	A rural holding might not suffer one single neat impact, but a combined effect on continuity and viability. A functional approach may split these matters across roads, ecology, and hydrology and never assess the operational or socio-economic effect on the holding as a managed unit.
3.8 Recreation and Destination Use	The area as used and valued for walking, cycling, riding, visiting, and visitor-dependent use.	A hospitality business or recreation route might be affected by the combination of several factors. The practical effect may be reduced visitor draw because tranquillity, habitat interest, dark skies, conservation value, and access reliability are all affected together. If those matters are assessed under separate functional headings, the effect on destination use can be missed or understated.
3.9 Rural Roads and Access Network	Dependence on a constrained rural transport network whose significance arises from its vulnerability to construction and operational burden.	A road may remain technically open yet become less usable because flooding, potholes, narrow passages, abnormal loads, cyclist and horse-rider conflict, and village access pressures interact. If transport is treated only through traffic volume, routing, or capacity, the Environmental Statement may miss the actual burden on the rural access network.
3.10 Operational Environment Uses	Specialised uses of the area that depend on open upland airspace, darkness, visibility, and the absence of large-scale vertical infrastructure or intrusive lighting.	This may not involve a simple aviation or Ministry of Defence issue in isolation, but rather a potential effect on the area's continuing suitability for activities that depend on its combined attributes. If assessment is confined to separate topics such as aviation, lighting, noise, or military consultation, or relies mainly on desk-based scoping, it may miss locally observed uses such as flare-based night training, paramotors, as well as any indirect effect on residents arising from displaced activity.

Receptor	Organising principle	Example of what may be missed/misrepresented
3.11 Other Locally Identified Receptors	Recurrent local receptors that do not fit neatly within the main classes but are still sufficiently specific to require identification.	Newsham Village Green is an example of the issue not being road traffic in general, but the effect of construction traffic on a specific shared community space used by children and residents. A standard transport chapter might never identify that receptor at all. Similarly, the contribution of the landscape to UNESCO Geopark status may disappear if reduced to heritage, tourism, and ecology separately.

NB: The examples are illustrative rather than exhaustive. Their purpose is to demonstrate how an Environmental Statement may appear topic-complete whilst still omitting or obscuring the actual integrated effect on a receptor identified by the community consultation.

Appendix C – Artificial intelligence statement

Artificial Intelligence (AI) tools were used to assist in the preparation of this report in the following ways:

- preliminary topical research support;
- helping to design and implement the online receptor video and questionnaire;
- initial textual analysis and thematic sorting of community submissions;
- removal of support or objection language from community submissions;
- general editorial support, critique, and checking of clarity; and
- assistance in analysing and summarising Olsen's Scoping Request.

Although community submissions were analysed thematically with AI assistance, all submissions were read individually, themes explored using other techniques (e.g. factor analysis), the Scoping Request read independently, and the final decisions on themes, categories, and pathways were made by the author.

The purpose, structure, judgments, interpretation of community evidence, selection of material, and final wording are the responsibility of the report author. Any AI-assisted wording used in the report was reviewed, checked, and edited before inclusion.

Appendix D – Peat map comparisons

Natural England peat-depth / peat extent mapping (2025)

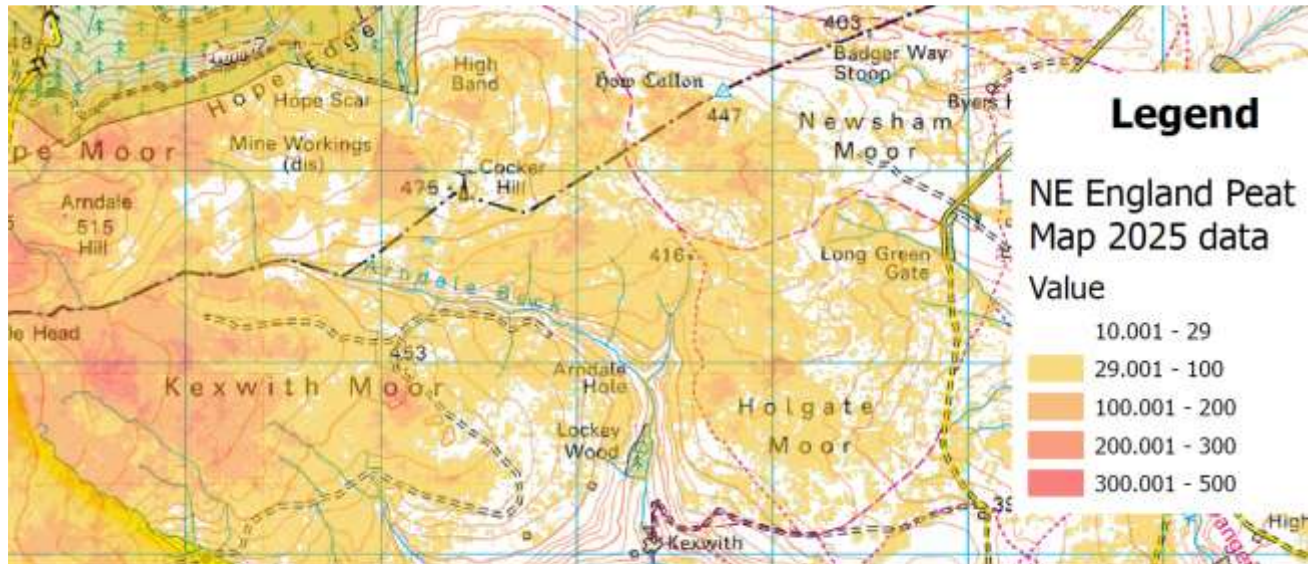
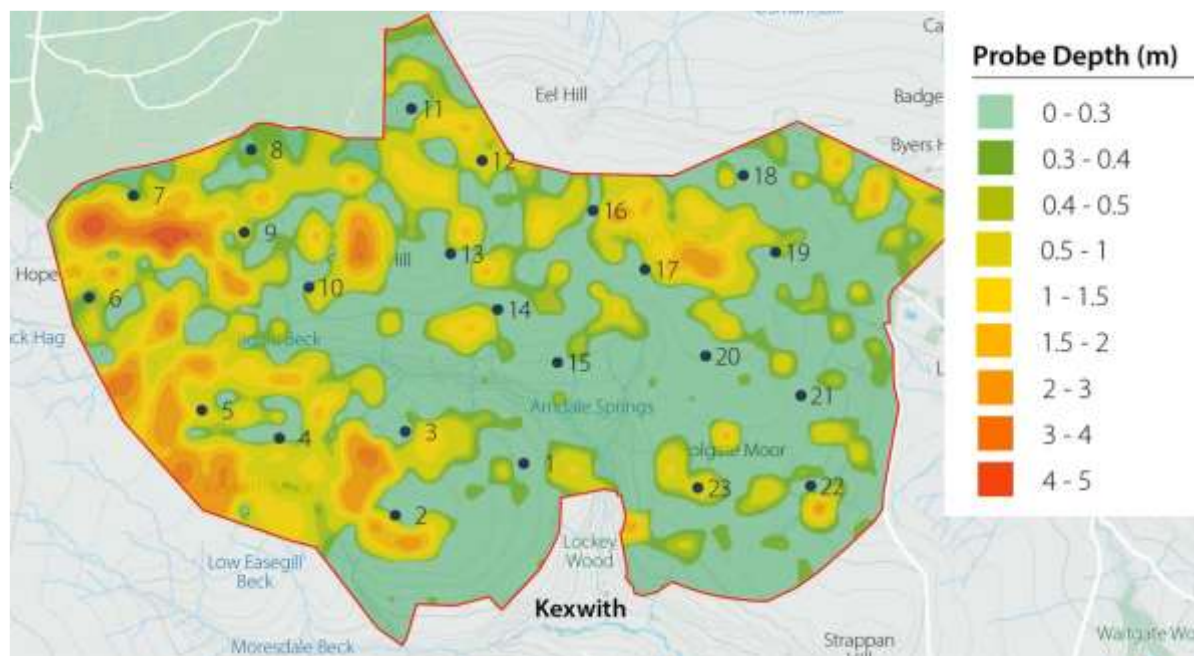


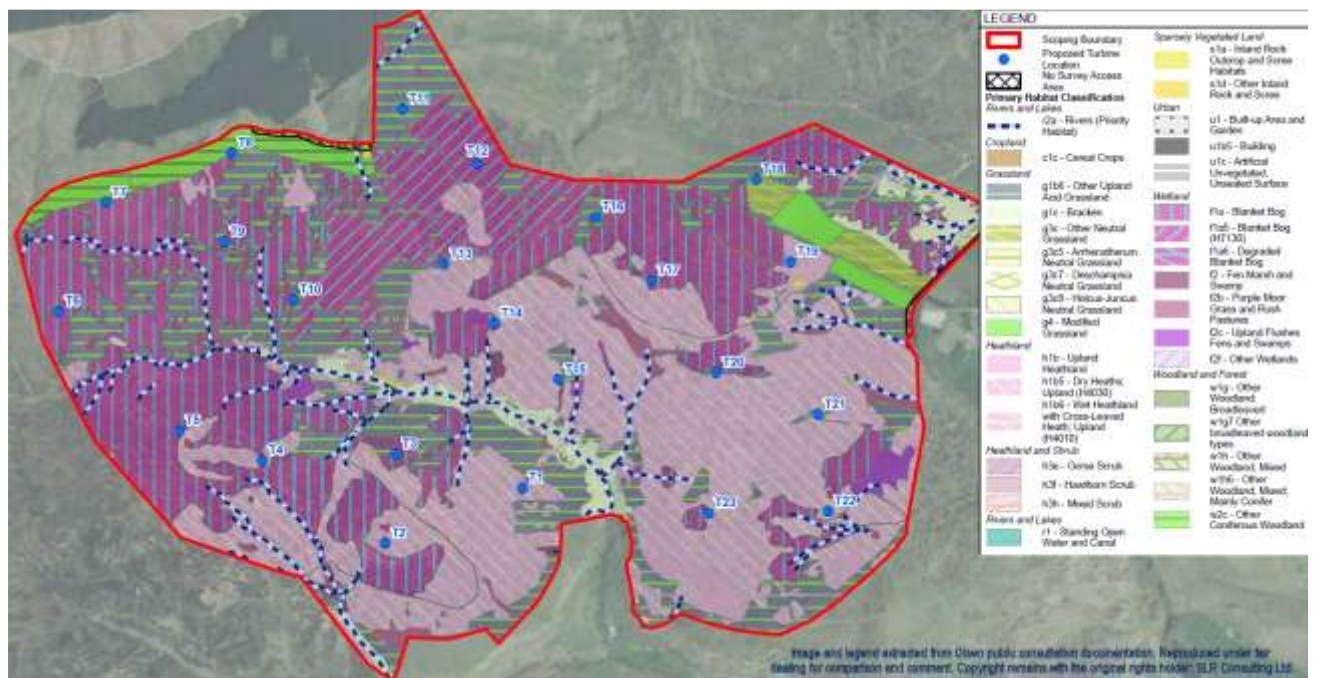
Image and legend reproduced for comparison and comment from community-supplied Natural England documentation. Copyright remains with the original rights holder.

Olsen Scoping Request peat-depth mapping (2026)



Source: Olsen public consultation: https://www.datocms-assets.com/197579/1778510450-15111-for-hm-digital_peat_depth_map.webp. (Linked to from <https://hopemoor.co.uk/documents/>). "Stage 1 Maps – May 2026" > "Peat depth map". Also found in the Scoping Request as Figure 10.1. Reproduced for comparison and comment. Copyright remains with the original rights holder.

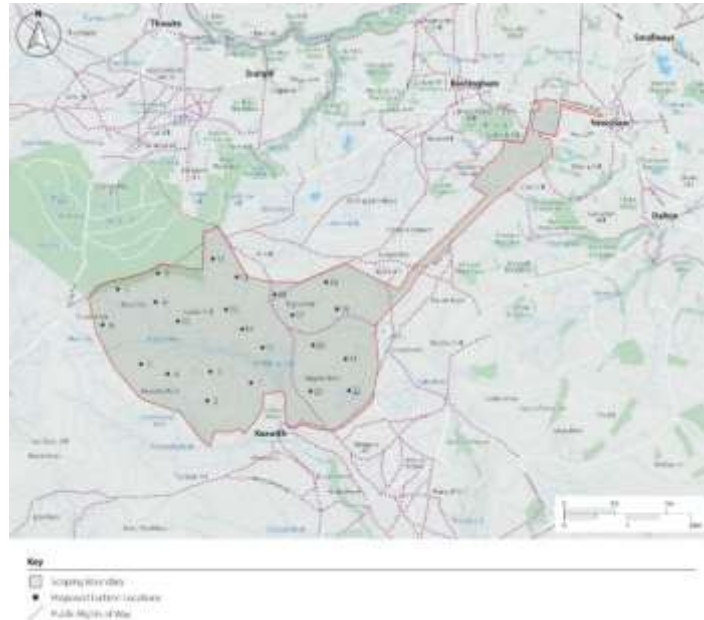
Olsen UKHab / habitat classification (2026)



Source: Olsen public consultation: <https://www.datocms-assets.com/197579/1778875805-414-063912-00001-0065-1habitats.pdf> (linked to from <https://hopemoor.co.uk/documents/>). "Technical maps – May 2026" > "UK Habitats Classification map". Reproduced for comparison and comment. Copyright remains with the original rights holder.

Appendix E – Route classification comparisons

Olsen Rights-of-way Map



Source: Olsen public consultation material: https://www.datocms-assets.com/197579/1778510477-15111-for-hm-digital_public_row_map.webp (linked to from <https://hopemoor.co.uk/documents/>). “Stage 1 Maps – May 2026” > “Public rights of way map”. Reproduced for comparison and comment. Copyright remains with the original rights holder.

Ordnance Survey route classifications



Source: <https://explore.osmaps.com/>. Map reproduced under fair dealing for purposes of comparison and comment. Copyright remains the property of Ordnance Survey (OS). OS is not the legal source of rights-of-way status, but maps have been cross-checked with local highway authorities' online maps and there is broad agreement as to the location of relevant bridleways.

Appendix F – Grid connection image



Grid connection

Connecting to the grid

Recent changes to grid connection processes across the UK mean that the grid connection point will not be confirmed until later in the development timeline. As a result, the grid connection route and method do not form part of this application and will instead be progressed through a separate application.

We will share further information as it becomes available.

Source: <https://www.datocms-assets.com/197579/1777493904-con-1-consultation-document.pdf> (Linked to from: <https://hopemoor.co.uk/documents/>). "Stage 1 Consultation Documents – May 2026" > "Consultation Document". Extract reproduced for comparison and comment. Copyright remains with the original rights holder.

Appendix G – Numerical summary of community data

This appendix summarises the final cleaned dataset from the Hope Moor Wind Farm receptor-identification questionnaire. The dataset contains 202 submissions.

Percentages are calculated as a share of the 202 submissions.

For receptor types and impact pathways, respondents could tick more than one option, so totals in those tables do not add to 202.

G1. Privacy and optional contact fields

Field	Count	Percent
I have privacy/safety concerns about being identified	6	3.0%
I am a tenant and do not want my landlord to identify me	2	1.0%
Name provided	23	11.4%
Email provided	23	11.4%
Phone number provided	19	9.4%
Preferred contact method stated	5	2.5%

G2. Location, relationship to place, and water supply

Field	Count	Percent
Nearest postcode or what three words provided	202	100.0%
Description or nearest place / landmark provided	160	79.2%
Private water supply – yes	38	18.8%
Private water supply – no	88	43.6%
Private water supply – unsure	13	6.4%
Private water supply – not answered	63	31.2%
Short factual description provided	202	100.0%

G3. "This relates to" (single choice)

Response option	Count	Percent
Home	68	33.7%
Business	12	5.9%
Community asset	32	15.8%
Place used regularly	82	40.6%
Managed property or land	8	4.0%

G4. Receptor type (multiple choice)

Response option	Count	Percent
Residential dwelling(s)	82	40.6%
Individual human receptor (health sensitivity)	54	26.7%
Public right of way / bridleway / open access users	108	53.5%
School / childcare / care home / medical facility	5	2.5%
Heritage asset (listed / scheduled / conservation area)	97	48.0%
Landscape viewpoint / valued view / recreation viewpoint	133	65.8%
Ecology / habitat (e.g., peatland, moorland, watercourse corridor)	81	40.1%
Water environment (stream/river/wetland/spring/groundwater/private supply)	67	33.2%
Farm / agricultural holding	39	19.3%
Tourism / hospitality business or attraction	82	40.6%
Transport route / junction / road safety location	46	22.8%
Other receptor type selected	21	10.4%
'Other' receptor description provided	28	13.9%

G5. Impact pathway (multiple choice)

Response option	Count	Percent
Visual / landscape character	166	82.2%
Noise	118	58.4%
Shadow flicker	71	35.1%
Aviation/lighting/night-time effects (incl. dark skies)	121	59.9%
Traffic and transport (HGVs, road safety, severance)	106	52.5%
Hydrology / water quality (including downstream concerns)	82	40.6%
Peat disturbance / carbon / land instability	88	43.6%
Ecology (species disturbance, habitat loss/fragmentation)	93	46.0%
Construction impacts (dust, vibration)	106	52.5%
Cumulative effects (with other schemes)	61	30.2%
Other impact pathway selected	15	7.4%
'Other' pathway description provided	14	6.9%

G6. Editing of support or objection language

Field	Count	Percent
Receptor descriptions edited to remove language expressing support for the wind farm	1	0.5%
Receptor descriptions edited to remove language expressing objection to the wind farm	77	38.1%

Appendix H – Landscape / recreation / destination viewpoints

<i>Black Hill (Ivelet)</i>	<i>Harter Fell</i>	<i>Peat Moor Hill</i>
<i>Booze (Arkengarthdale)</i>	<i>Height of Hazely</i>	<i>Penhill</i>
<i>Bouldershaw Moor</i>	<i>Helvellyn</i>	<i>Pen-y-Ghent</i>
<i>Buckden Pike</i>	<i>Holgate How</i>	<i>Pickerstone Ridge</i>
<i>Calver Hill</i>	<i>Holgate Pasture</i>	<i>Rogan's Seat (Keld)</i>
<i>CB Yard</i>	<i>How Tallon</i>	<i>Rokeby Inn</i>
<i>Cotherstone Moor</i>	<i>Hurst Moor</i>	<i>Romaldkirk Moor</i>
<i>Cross Fell</i>	<i>Ingleborough</i>	<i>Skiddaw</i>
<i>Dodd Fell</i>	<i>Lake District summits</i>	<i>Slei Gill / Sleigill</i>
<i>Downholme</i>	<i>including Scafell Pike</i>	<i>Tallon How</i>
<i>East Grain Moor</i>	<i>Little Whernside</i>	<i>Tan Hill</i>
<i>Fore Gill</i>	<i>Lovely Seat (Hawes)</i>	<i>The Fleak summits</i>
<i>Fountains Fell</i>	<i>Marrick</i>	<i>The Stang Road area</i>
<i>Fremington Edge</i>	<i>Melbecks Moor</i>	<i>Thorn Hill</i>
<i>Great Pinseat</i>	<i>Middleham Low Moor</i>	<i>Upper Wharfedale</i>
<i>Great Shunner Fell</i>	<i>Middleton-in-Teesdale</i>	<i>Whipperdale Bank</i>
<i>Great Whernside</i>	<i>Newbiggin</i>	<i>Windegg</i>
<i>Harkerside</i>	<i>Nine Standards Rigg</i>	

Appendix I – Other named places

A large number of archaeological and heritage sites were identified that may be affected by the proposed development. Most of these are visible by zooming in at the Historic England map search at <https://historicengland.org.uk/listing/the-list/map-search/>. Some examples (not comprehensive) of the places identified include:

<i>Badger Way Stoop</i>	<i>Boundary Stone 550</i>	<i>Dalton Conservation Area</i>
<i>Barningham Conservation Area</i>	<i>metres north of Byers Hill</i>	<i>Holy Trinity Church, Wensley</i>
<i>Bolton Castle</i>	<i>Bowes Museum</i>	<i>Raby Castle</i>

Various residential locations were identified. Specific house or farm names have been removed for privacy reasons (see footnote to Appendix A). Areas mentioned include:

<i>Arkengarthdale</i>	<i>Greta Bridge</i>	<i>Scargill</i>
<i>Barnard Castle</i>	<i>Helwith</i>	<i>Smallways</i>
<i>Barningham</i>	<i>Hope</i>	<i>Spanham</i>
<i>Brignall</i>	<i>Hutton Magna</i>	<i>Tees Valley</i>
<i>Bushy Park</i>	<i>Kexwith/Holgate Moors</i>	<i>The Stang</i>
<i>Crackpot/Whitside</i>	<i>Kirby Hill</i>	<i>Thwaite</i>
<i>Dalton</i>	<i>Langthwaite</i>	<i>Westwick</i>
<i>Dousgill</i>	<i>Marske</i>	<i>Whashton</i>
<i>Gayles</i>	<i>Newsham</i>	<i>Whaw</i>
<i>Greta</i>	<i>Ravensworth</i>	

Appendix J – Wind farm image

Some community feedback indicated that the image below does not provide a sufficient basis for understanding the size and scale of 200m turbines.



Source: <https://www.datocms-assets.com/197579/1777493932-con-1-strategy-doc.pdf>, p.1.

Extract reproduced for comparison and comment. Copyright remains with the original rights holder.

Appendix K – Mining and water maps

Northern Mines Research Society (map of mineral mines)



<https://nmrs.org.uk/mines-map/metal/non-ferrous-mines-of-the-british-isles/non-ferrous-mines-england-2d-mapping/>

Ordnance Survey (map showing additional mines, shafts, and shake holes on site)



Source: <https://explore.osmaps.com>. Extract reproduced for comparison and comment. Copyright remains with the original rights holder.

Environment Agency Catchment Data Explorer

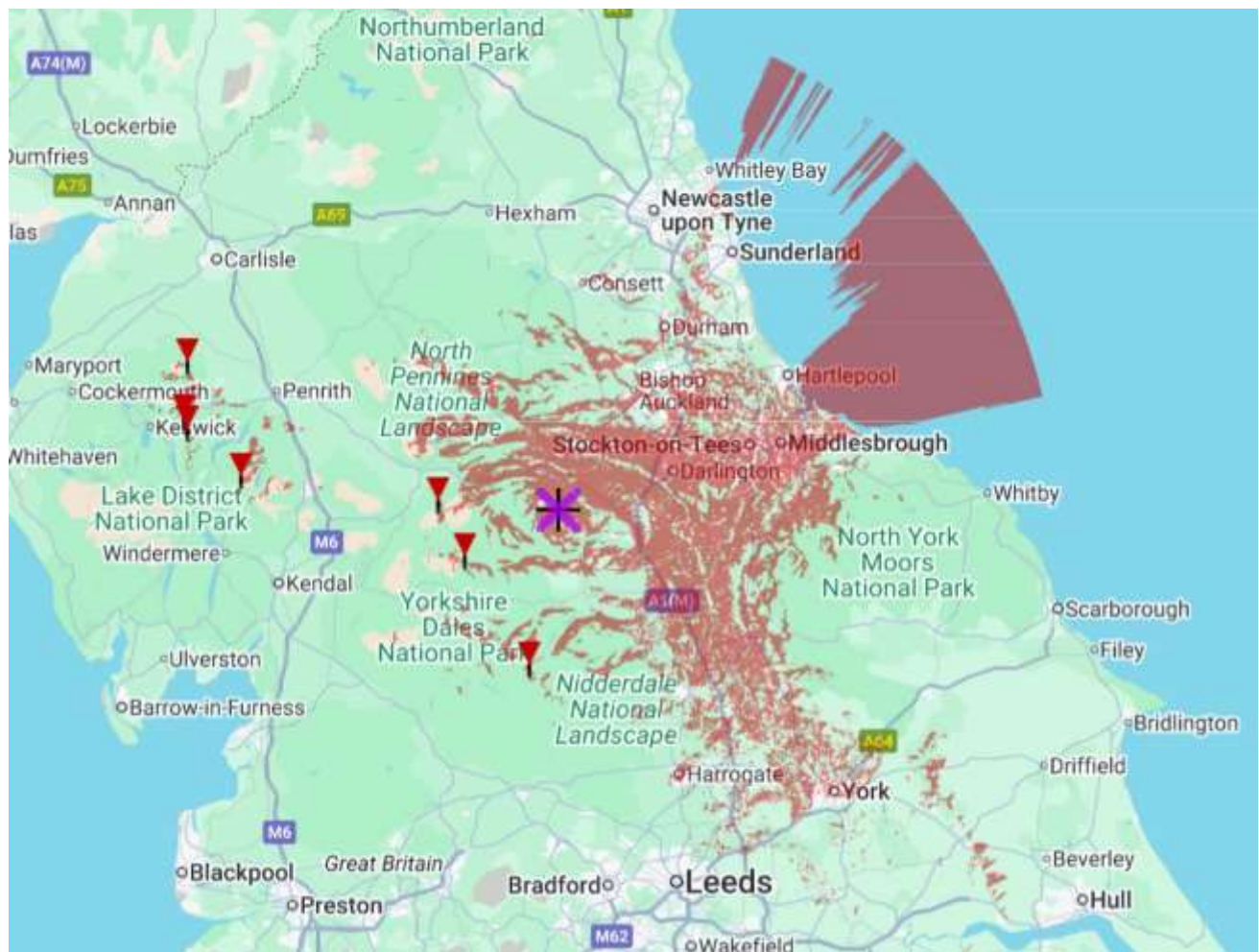
Data relating to water contamination from the proposed site to the River Swale via Marske Beck:



Source: <https://environment.data.gov.uk/catchment-planning/WaterBody/GB104027069140>. Extract reproduced for comparison and comment. Copyright remains with the original rights holder.

The data identifies the Marske Beck from Source to River Swale water body as having moderate ecological status (which the author understands to mean it is not in bad condition, but it is also not good enough to meet the expected environmental standard). Contaminants include zinc, cadmium and its compounds, mercury and its compounds, PBDE, and lead and its compounds. The cadmium, lead, and zinc are attributed to abandoned mine pollution from mining and quarrying.

Appendix L – Community-generated ZTV analysis



Source: <https://www.heywhatsthat.com/?view=SUDWDH12>

Part III – Supplementary Scoping Information

Ornithology

Buffer expansion and reasoning

A significant feature of the moor is the diversity and conservation importance of bird species that live in and travel through the area. NPC requests that the Planning Inspectorate (PINS) does not accept the standard 2 km ornithological survey buffer proposed by SLR Consulting Ltd in Section 8.2 of the EIA Scoping Report as sufficient for all relevant species and pathways.

The proposed development comprises a maximum of 23 turbines with a tip height of up to 200 m and a rotor diameter of up to 175 m across approximately 1,111 hectares of open upland habitat. The scale and location of the proposed array create the potential for substantial collision, displacement, and barrier effects extending beyond the immediate project boundary.

Limiting primary vantage-point (VP) survey and collision-risk assessment to a 2 km zone from the Scoping Boundary risks materially under-characterising the movement of target species across the wider upland landscape. NPC therefore requests that the Scoping Opinion requires the ornithological survey and assessment buffer to be extended to a minimum radius of 5 km for target waders and 10 km for wide-ranging target raptors.

Scientific and Regulatory Grounds for Buffer Expansion

Ecological Connectivity to the North Pennine Moors SPA:

The applicant notes that the North Pennine Moors Special Protection Area (SPA) is located approximately 3.2 km south-west of the site boundary. A field-survey buffer limited to 2 km will not adequately capture the wider movement of qualifying species between the SPA, surrounding upland habitat and the proposed wind-farm site.

Relevant conservation guidance recognises that the foraging and commuting ranges of key SPA qualifying species can extend well beyond 2 km:

- Hen harrier: documented foraging ranges can extend up to approximately 10 km from nesting sites during the breeding season.⁴³
- Merlin: foraging movements can extend up to approximately 5 km.⁴⁴
- Golden plover and curlew: may use functionally linked land beyond SPA boundaries for breeding, foraging, roosting, and seasonal movement, although their typical ranging distances differ substantially.⁴⁵

A 2 km buffer is therefore insufficient to characterise fully the arrival, departure and cross-array flight lines of species moving between the SPA, the proposed site and the wider upland landscape. This creates a material risk that subsequent collision-risk, displacement, barrier-effect and habitat assessments will be based on an incomplete baseline and provides the scientific basis for the buffer expansion requested above.

The “Rochdale Envelope” and Cumulative Macro-Displacement:

In Section 2.4, the applicant invokes the “Rochdale Envelope” to allow for significant structural design flexibility and micro-siting. The Environmental Statement must therefore assess the realistic worst-case ornithological effects arising from the full design envelope, including the potential for displacement and barrier effects associated with an array of up to 23 turbines with rotor diameters of up to 175 m.

The ornithological zone of influence may extend beyond the physical footprint of the array where birds alter their flight paths, avoid turbine areas, lose access to habitat, or experience cumulative displacement across the wider upland landscape.

Capping the baseline survey at 2 km risks leaving the Environmental Statement unable to quantify adequately macro-displacement and the overall barrier effect across the wider Swaledale-to-Tees valley landscape corridor. This provides a further basis for the expanded survey and assessment areas requested above.

⁴³ Scottish Natural Heritage (2016), *Assessing Connectivity with Special Protection Areas (SPAs)*, Version 3, Table 1, available at: <https://www.nature.scot/sites/default/files/2022-12/Assessing%20connectivity%20with%20special%20protection%20areas.pdf>

⁴⁴ Ibid.

⁴⁵ Ibid.

Additional Survey and Assessment Requirements

In addition to the expanded survey and assessment areas requested above, NPC requests that the Scoping Opinion includes the following requirements:

Survey effort and seasonal coverage

Paragraph 8.3.25 of the Scoping Report states that 36 hours of vantage-point survey were undertaken per season at each of three vantage points. In line with UK government guidelines,⁴⁶ surveys should cover a minimum of 36 hours per vantage point per season, increasing to 72 hours per vantage point per season for priority species such as birds of prey, otherwise known as raptors.

The Scoping Report records several priority raptor species, including hen harrier, merlin, peregrine and red kite. NPC therefore requests that the Environmental Statement explains why only 36 hours per season were undertaken and demonstrates whether the survey effort was sufficient in light of the 72-hour guideline for priority species.

The low number of curlew flights recorded during the survey period, when compared with local observations of substantially greater curlew activity nearby, also raises a separate question about whether the timing and distribution of the survey watches provided a representative baseline.⁴⁷

The Environmental Statement should identify the dates, times, weather conditions and seasonal distribution of the vantage-point watches and explain whether the survey effort adequately captured periods when target-species activity was likely to be greatest. Where the existing survey programme did not provide representative coverage, further survey should be undertaken.

⁴⁶ <https://www.gov.uk/guidance/wild-birds-surveys-and-monitoring-for-onshore-wind-farms>

⁴⁷ To expand on the short curlew study that Dr Myers referred to in his report, the Scoping Request recorded only 16 flights in 432 hours of survey. A community survey just south of Newsham (circa 4.5 km from the project boundary) on the morning of 31st May 2026 recorded 22 individual flights of curlew within 24 minutes. Although the surveys cannot be directly compared – and even allowing for differences such as methodology, season, weather, and location – the difference in the observed rates of curlew activity is extremely large and needs to be investigated and explained. This is reinforced by other observations in the Scoping Request that are not easy to reconcile with long-term community experience, including red kite being recorded six times more often than curlew and three times more often than lapwing, and peregrine falcon being recorded more often than curlew.

Ornithological surveys – owls

The Scoping Report records the presence of owl species, including barn owl and short-eared owl, but does not appear to refer to any night-time, dusk or dawn surveys. Daytime vantage-point surveys alone may therefore under-record owl activity and provide an incomplete basis for assessing collision risk, displacement, disturbance and habitat use.

NPC requests that the applicant explains how owl activity has been assessed and that night-time surveys are carried out using thermal imaging, radar or other appropriate technology where the existing surveys do not adequately assess the risk of collision and other negative impacts on owl species.

Vantage-point coverage and visibility

The Scoping Report relies on three vantage points and states that target-species flight activity was recorded within the relevant survey area. However, the site's upland topography, weather conditions and the distance of birds from observers may have affected the ability to detect, identify and track birds consistently across the full survey area.

NPC requests that the Environmental Statement provides maps showing the actual viewshed from each vantage point, including overlapping coverage, blind areas and topographical obstruction, and demonstrates full visual coverage of the expanded survey area and relevant airspace up to a height of 250 m, providing a precautionary margin above the maximum 200 m turbine tip height.

It should also explain the optical equipment used, the effect of visibility and weather conditions, and how flight distance and height were estimated. Where the proposed turbine array or relevant collision-risk airspace was not adequately visible, additional vantage-point coverage should be provided.

Survey limitations in low-visibility conditions

The proposed site is at an upland elevation of approximately 503 m above sea level and is frequently affected by mist, cloud and other low-visibility weather conditions. It is also located close to the North Pennine Moors SPA. The Scoping Report does not make clear how much scheduled survey time was affected by restricted visibility or whether migratory, commuting and cross-array movements during those periods were captured by other methods.

NPC requests that the Environmental Statement identifies the extent to which visibility limitations affected the vantage-point survey data and explains whether the resulting baseline remains representative. Traditional visual vantage-point surveys should be supplemented by automated migratory tracking radar, thermal imaging or other suitable tracking technology across the expanded 5 km survey area, with sufficient coverage to include two full migratory seasons. The precise method and duration should be agreed with Natural England.

Selection of target and secondary species

Paragraph 8.3.17 states that the selection of target species for surveying and recording was informed by preliminary site visits and NatureScot guidance. Paragraph 8.3.26 reports flight activity for 15 target species. However, GSC Grays states: “There are over 140 species of bird and 24 ‘red list’ protected species on the [Barningham] Estate.”⁴⁸ This raises a question about whether the preliminary site visits identified all relevant species of conservation concern and whether those species were adequately covered by the subsequent surveys.

Also, the absence of recorded hen harrier breeding during the survey period should not be treated as establishing that the site has no breeding potential. Hen harriers breed elsewhere in the Yorkshire Dales and North Pennines, and the Hope Moor area includes apparently suitable heather-moorland habitat. The Environmental Statement should therefore explain how the potential for future breeding use has been assessed and whether the survey period was sufficient to characterise that potential.

NPC requests that the Environmental Statement identifies:

- which species were treated as target species;
- which were recorded as secondary species;
- which were covered by breeding-bird, wintering-bird or other survey methods;
- how the Barningham Estate records and other local and historical records were taken into account; and
- the basis for any proposal to scope out individual species or impact pathways.

Further red- and amber-listed species noted as present, including relevant moorland breeding species, should be considered for further assessment. Where they were not

⁴⁸ <https://www.gscgrays.co.uk/case-studies/pioneering-a-natural-capital-approach-to-land-management/>

adequately covered by the existing survey programme, further survey and assessment should be undertaken.

Review of the existing ornithological baseline

Taken together, the apparent discrepancy in curlew activity, the lack of clarity about owl survey methods, possible visibility constraints, the survey effort for priority raptor species, and the difference between local records and the target-species list raise material questions about whether the existing ornithological survey methodologies and baseline are sufficiently complete and representative.

NPC requests that the survey methodologies and findings are reviewed with Natural England before the Environmental Statement is finalised. Where the existing evidence does not provide a reliable basis for collision-risk modelling, displacement assessment, habitat assessment, or the scoping-out of species and impact pathways, further or updated surveys should be undertaken. Where the identified deficiencies cannot be remedied through supplementary work, the relevant surveys should be repeated using revised methods that take account of the matters raised above and allow sufficient additional seasonal and inter-annual coverage to establish a representative baseline.

Extreme weather conditions

Scoping in and reasoning

The Scoping Request scopes out extreme weather conditions, including lightning strikes, on the basis that turbines have design safeguards and lightning protection built in. However, storm and lightning damage to turbines does sometimes occur. For example, on 28th May 2026, one of the turbine blades at the Scout Moor Wind Farm in Lancashire was reportedly damaged by a suspected lightning strike. The report included photographs showing significant damage to a turbine blade and debris spread around the area.⁴⁹ There are also cases of severe weather contributing to turbine collapse. For example, on 14th February 2022, at the Pant y Wal Wind Farm, a combination of a technical fault and high winds put a turbine into a sustained overspeed condition.⁵⁰

Even if the probability of severe damage is low, the potential consequences of such extreme weather events at Hope Moor need to be considered in relation to local receptors and pathways, including public access, private water supplies, agricultural water use, peat, drainage, and contamination risk. The potential for collapse requires particular attention because the Scoping Report itself identifies limestone, shake holes, sink holes, historic mining, and potential ground instability. These may indicate karstic ground conditions, which can present foundation risks through voids, subsidence and differential settlement. This points to a potential pathway from the area's geological features, through karstic or unstable ground, to possible turbine instability, tilting or toppling.⁵¹

NPC requests that extreme weather be scoped in and assessed in combination with site-specific ground instability, mining legacy, limestone dissolution, peat, drainage, hydrology, public access, and private/agricultural water-supply pathways. The Environmental Statement should identify what monitoring, mitigation, emergency response, and remedial responsibilities would apply if serious turbine damage, debris dispersal, ground instability, or contamination were to occur.

⁴⁹ <https://www.manchestereveningnews.co.uk/news/greater-manchester-news/lightning-damage-scout-moor-sparks-34053877>

⁵⁰ <https://renews.biz/80168/nordex-blames-welsh-turbine-collapse-on-overspeed-fault/>

⁵¹ https://digitalcommons.usf.edu/cgi/viewcontent.cgi?article=1050&context=kip_talks

Peat condition, mapping, and carbon baseline

Additional peat analysis and reasoning

Dr Myers' community report identifies peat as both a receptor and a pathway, and discrepancies in peat maps within the developer's own materials and with a community-supplied peat map authored by Natural England. NPC wishes to expand on that analysis and request that the developer be directed to provide a much more open analysis of how professional judgments about the peat are arrived at.

This request is based on a comment in the Scoping Request that the peatland is likely to be an overall net emitter of carbon because of its reportedly poor condition and heavily eroded state. This conclusion appears to be stated more firmly than the evidence currently presented permits. There are other potential interpretations of the data in the Scoping Request.

The Scoping Request refers to satellite imagery as confirming artificial drainage, burn scars and poor peat condition. However, rotationally managed heather, recently burnt compartments, regenerating vegetation, bare peat, drainage features, and active erosion may produce superficially similar patterns in optical images derived from satellite photographs.⁵² Burn patterns or heather dominance do not, in themselves, demonstrate that the underlying peat is heavily eroded or that the peatland as a whole is a net carbon emitter.

NPC requests that the Environmental Statement provide not only a transparent reconciliation of the different maps and classifications – as discussed in Dr Myers' report – but also an open and verifiable explanation of the professional judgments used. The Environmental Statement should also distinguish clearly between:

- vegetation and land-management patterns;
- artificial drains, blocked grips, and other hydrological modifications;
- bare peat, hags, gullies, and active erosion;

⁵² Lees, K.J. et al. (2021), 'Using satellite data to assess management frequency and rate of regeneration on heather moorlands in England as a resilience indicator', available at: <https://iopscience.iop.org/article/10.1088/2515-7620/ac1a5f>; and JNCC Report No. 667 (2021), *Developing a framework for using Earth Observation imagery to monitor peatland condition*, available at: <https://data.jncc.gov.uk/data/958df51f-2e7c-4d2b-92f0-eac84c2a86af/JNCC-Report-667-FINAL-WEB.pdf>

- peat depth and extent;
- habitat classification and condition; and
- the annual greenhouse-gas balance and the total stock of carbon stored within the peat.

Even if parts of the peatland are found to be degraded or currently emitting greenhouse gases, that would not remove the need to also assess the moor's significance as a substantial accumulated carbon store, bog habitat, hydrological receptor, stabilising influence on the upland water system, contributor to downstream runoff regulation - which is of particular concern on the Swale side of the moor - and an environmental resource capable of restoration. NPC therefore requests that the Environmental Statement should examine separately:

1. the existing annual carbon flux;
2. the carbon stored within the peat;
3. the additional carbon that may be released through excavation, drainage, compaction or altered hydrology;
4. the effects on peat-forming and water-regulating functions; and
5. the reasonable future baseline, including the potential for restoration in the absence of the development.

NPC requests that the Scoping Opinion should require these matters to be presented with a sufficiently documented explanation and audit trail of evidence to allow PINS, statutory consultees and affected communities to understand how the conclusions have been reached and to assess how differences of interpretation have arisen.

Responses to specific Scoping Request questions

The Scoping Request includes a number of questions at the end of each section designed to assist consultees in forming their responses. NPC offers the following answers to those questions, to be considered in addition to those matters already covered above.

4. Legislation and Policy Context

Q4.3: Do consultees have any comments on the local planning policy context set out in Section 4.6?

Paragraphs 4.6.10-4.6.12 discuss the DCC Wind Turbine Development Evidence Paper (Ref 4-16). Paragraph 4.6.12 states *“Several of the constraint maps included in the paper identify the Site as suitable for wind farm development.”*

This is incorrect. The document actually states that the area is unsuitable for turbines of any size (including micro turbines), as the area was considered to be of high sensitivity. See annotated extract in Annex 1 below.

Q4.4: Do consultees have any comments on the key environmental legislation of relevance to the Project in Section 4.7?

Although Local Nature Recovery Strategies are referred to elsewhere in the Scoping Request, they are not identified in Table 4.1. These are statutory strategies established under sections 104–106 of the Environment Act 2021. They are important because they identify biodiversity priorities, map areas of importance for biodiversity, and identify opportunities for habitat creation or improvement. The Environmental Statement should explain how the relevant Local Nature Recovery Strategies will inform the assessment and any proposed mitigation or off-site compensation.

5. Landscape & Visual

5.1: Do consultees have any comments on the proposed approach and methodology?

Section 5.6 Potential Effects does not include any consideration of likely physical effects to land. Given the likely scale of the works to create the main haul road, a full assessment

should be made of their likely landscape impacts and details provided of the proposed ground restoration.

5.5: Do consultees have any comments or suggestions in relation to the Preliminary Representative Viewpoint Locations shown in Table 5-3 and illustrated on Figures 5.2 - 5.5?

The proposed Barningham viewpoint (4) on the road near the top of the village is partially screened by trees. A viewpoint at the Barningham sign and bench further up the hill, where the view of the moor opens up, would give a more realistic picture of the impact of the turbines on Barningham and its visitors.⁵³

The moor farm Haythwaite is just outside of the 2km buffer zone for visualisation assessment at residential properties but arguably is one of the most affected properties in Barningham parish, so a visualisation from there would be helpful.⁵⁴

6. Archaeology and Cultural Heritage

6.3: Are there any assets, not listed in the appraisal, that key consideration should be given to?

Dr Myers' report raises a question over whether the Newsham Conservation Area is covered by the Scoping Request (see 4.12.8 of his report). NPC would like to emphasise that this conservation area is, in fact, missing from the assessment of "Conservation Areas within 5 km" provided in Appendix 6B, Table 6, and needs key consideration.

7. Ecology

7.1: Are there any additional baseline data sources that should be used to inform the assessment?

Local knowledge may add to reported species sightings, and comments above highlight the presence of many bird species. In addition, residents have observed adders and

⁵³ British National Grid coordinates: Easting 408032, Northing 510085.

⁵⁴ British National Grid coordinates: Easting 405730, Northing 509095.

hedgehogs on Barningham Moor and it should be assumed that they are present on the development site unless there is clear evidence to the contrary.

7.2: Do consultees agree that the scope of the surveys undertaken and proposed will be sufficient to inform the assessment?

Bats

Table 7-1 describes the assessment approach, stating on page 134 (1st paragraph on bat surveys) that the work is designed to meet current NatureScot guidelines (Ref 7-5). However, on page 135 (2nd paragraph under “Automated bat activity survey”), it is proposed to use publicly available Richmond weather data for the rainfall and weather values required to complete the analysis of surveys undertaken in 2024 and to be undertaken in 2026.

Richmond weather data will not be representative of conditions at the project Site, which is in a much more elevated and exposed location. Furthermore, the proposed free source (www.weatherline.co.uk) may not provide a quality assured data set.

The referenced NatureScot guidance for bat assessments for wind turbine developments states that weather data should be collected on site.⁵⁵

White-clawed crayfish

Appendix 7C of the Scoping Request contains a White-clawed Crayfish Technical Report prepared by third-party consultants for the earlier “Kexwith Wind Farm” proposal. The report repeatedly refers to Figure 1 as showing the Proposed Development and survey area, but Figure 1 is absent from the appendix. Figure 2 shows the crayfish survey locations and a site boundary, but it is unclear whether the area assessed corresponds to the entirety of the current Hope Moor Site.

⁵⁵ 5.2.6 Weather data: “Weather data including wind speed, temperature and rainfall are important for the interpretation of bat activity data, and should be recorded nightly for all types of bat survey. The use of automated weather meters is strongly encouraged, and it is suggested that more than one unit is deployed per site to allow for equipment failures. Wind speeds from existing turbines or met masts are extremely valuable, and it is important that requests for these data are made to the turbine operator/developer at the start of the project, (accompanied by information on the height at which the data were collected). Note that such data are often only stored on a temporary basis, and so may not be available if data requests are made retrospectively.”

The report states that white-clawed crayfish are assumed to be absent and that the nearest population is at Marske 10km downstream. However, they are known to be present in the Dalton Beck at Dalton as Yorkshire Wildlife Trust carried out a trapping project in 2025 for a breeding programme. The headwaters of the beck are within the Site area. Contact should be made with the Yorkshire Wildlife Trust project officer to confirm that further assessment is not required.⁵⁶

7.4: Are the consultees content to scope out the effects in Table 7-7?

Impacts to Brignall Banks SSSI

The need for post-incident monitoring and restoration should be included in the Pollution Prevention and Emergency Response Plan.

Impacts to otter

Otters are now widespread in local river catchments and the electro-fishing survey found a healthy population of brown trout in the Arndale Beck. The potential presence on site should be considered within the Construction Environmental Management Plan. It is noted that the Ecological Clerk of Works will be responsible for checking presence prior to vegetation clearance.

Impacts to white-clawed crayfish

The proposal to scope out should be reviewed once further baseline data has been obtained.

9. Hydrology and hydrogeology

9.1: Do the consultees agree that the receptors and impacts described in Section 9.7 can be scoped out?

Scoping should cover the Brignall Banks SSSI given that watercourses from on and around the proposed site feed into it and the water, and its surrounding ecosystem, is likely to be a food source for birds there, some species of which are listed in the designation.

⁵⁶ Contact details can be provided to the Planning Inspectorate on request.

9.2: It is not proposed to undertake any water quality sampling, establish groundwater monitoring points, surface water monitoring points or undertake leachability trials of any rock as there is published data that can be used to characterise baseline conditions and complete the impact assessment. Is this acceptable?

No baseline data is presented on groundwater conditions or seasonal variations, which will significantly affect the baseline hydrology of the site. It is our understanding that maintaining appropriate water levels is important to avoid further peatland degradation. The assessment should therefore establish the seasonal hydrological requirements of the peat and heather moorland, and the consequences of altered groundwater levels for peat condition and greenhouse-gas emissions. Potential impacts due to changes in groundwater levels should be assessed for these soil receptors and not just GWDTEs (Groundwater dependent terrestrial ecosystems). Measurement of groundwater levels on the Site should be included in the assessment.

9.4: Do you agree that the scope of the proposed assessment is appropriate?

To expand on a point already raised in Dr Myers' report, consideration should be given to where water to be used in the construction process would be drawn from. Many of the local becks and tributaries dry out in the summer and project abstraction from surface or groundwater could exacerbate water scarcity.

An impact assessment is required for the generation and discharge of wastewater from the concrete batching process if on Site, consistent with the intention stated in paragraph 2.5.42.

10. Geology

10.1: Site investigation and assessment, including detailed phase 2 high resolution peat depth surveys, augering and peatland condition assessment, will be undertaken along with ground stability and mining risk as part of the proposed assessment.

Should any additional investigation or data sources be considered when assessing baseline conditions?

Mining risk assessment

Table 10.1 of the Scoping Request states that the 2023 Mason Evans mining risk assessment (Appendix 10A) provides full coverage of the Site. But it only covers 490.6 ha of Kexwith Moor and the full site is 1111 ha. An assessment of the entire site is required.

Dissolution features

Paragraph 10.3.17 states that shake holes and dissolution features are shown as present within the Study area. No proposals are presented for how they will be investigated and assessed.

Bedrock and superficial geology

It is noted that there are no proposals for geotechnical investigations to establish the baseline at this stage but such work would be undertaken if development consent is granted (paragraph 2.5.10). The assessed impacts of some environmental effects may change if the finalised site layout differs significantly from the layout used to prepare the Environmental Statement. Provision for reassessment should be allowed for.

10.2: Do you agree that the scope of the proposed assessment is appropriate?

Borrow pits

There are no proposals for how potential impacts from onsite borrow pits will be assessed.

Ground stabilisation

To underline a point identified in Dr Myers' report, the assessment should consider impacts associated with ground stabilisation works which are likely to be needed in some areas.

11. Access, Traffic and Transport

11.1: Is the proposed method acceptable?

The assessment scope should include vehicle movements associated with the import of aggregate unless it can be confirmed that it will be sourced entirely from on-site borrow pits.

11.2: Are there any key locations on the road network within the Study Area that consultees would wish to see considered as sensitive receptors?

To underline some points made in Dr Myers' report, Newsham village is considered to be a highly sensitive receptor. The impacts on residents from construction traffic should be assessed, and alternative routes should be identified.

11.3: Are there any locations on the road network within the Study Area with atypically high accident rates?

The A66 between Low Lane and the A1(M) to the east and between Low Lane and the A67 to the west comprises several sections of single carriageway and multiple junctions. There have been frequent accidents (some fatal) along these stretches. There is also regular congestion on the A66 due to traffic volume with consequent effects on traffic flows.

12. Noise

Section error

Paragraph 12.3.3 refers to "Regional Route 71". The correct designation is presumably National Cycle Network Route 71, which passes to the south-west of the Site through Arkengarthdale. As this is a cycle-route designation rather than a road designation, the road or roads considered to be significant sources of traffic noise should be identified. The baseline assessment should also consider traffic noise from other relevant roads, including the A66 to the north and the B6270 in Swaledale to the south, and establish their relative contribution through the baseline noise survey.

12.1: Do you agree with the proposed methodology set out above?

Recreational users of the area around the site, notably walkers and cyclists, should be regarded as sensitive receptors and the impact of noise on them should be assessed. Potential locations for assessment could include How Tallon trig point and the Stang Road.

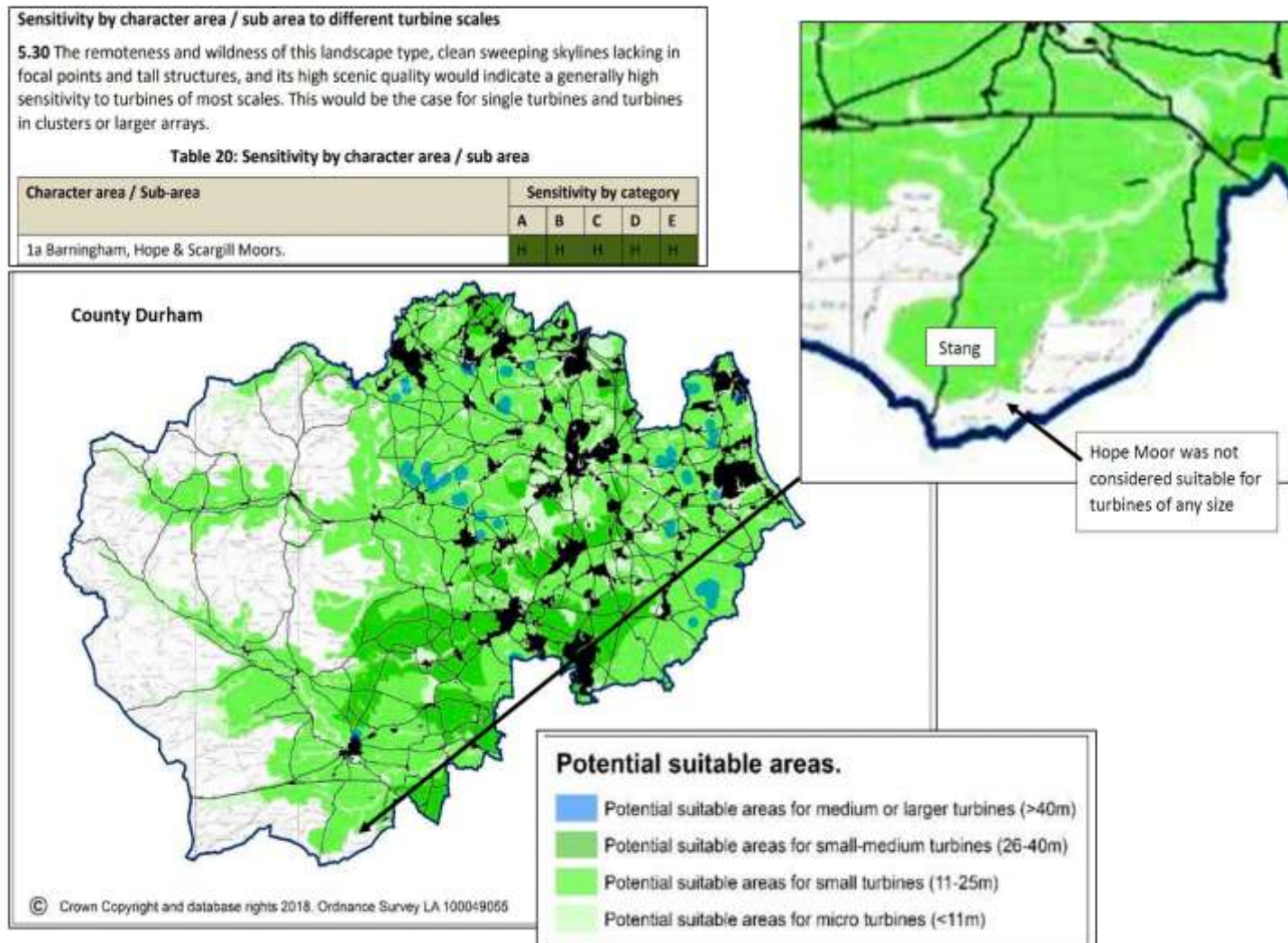
16. Carbon and climate change

16.1 - Do you agree that the appropriate guidance and legislation has been identified?

EN-3, paragraph 2.12.79 requires the use of NatureScot guidance “*Good practice during windfarm construction*” (2024), or new guidance for England when available, for developments on peatland. This includes assessment of potential carbon emission savings and losses associated with a wind farm development on peatland.

This guidance, or updated guidance if available, should be used in the assessment.

Annex 1 - Annotated extract from DCC Wind Turbine Development Evidence Paper





Environmental Services
Infrastructure Decisions and
Application Service
Planning Inspectorate
c/o QUADIENT
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Our Ref ZD26/00360/EIASCR
Date 25 June 2026

Dear Emily Park,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Proposed application by Fred. Olsen Renewables Ltd (the applicant) for an Order granting Development Consent for the Hope Moor Wind Farm (the proposed development)

Thank you for consulting North Yorkshire Council (NYC) on the above. Below is the response by North Yorkshire Councils Local Planning Authority.

OVERARCHING COMMENTS

The Scoping Report states that the connection point to the grid will not be included within the application or the Environmental Statement (ES). This is because the Applicant does not currently have sufficient information as there is no confirmed point of connection. NYC is concerned about this approach as the benefits of the development would essentially be reliant on another permission. Although there is no confirmed point of connection the Applicant must have considered some potential route options by this point to understand if the project is deliverable and it would be our preference that potential options are included within the ES so that the project can be considered as a whole. Without this information it is not possible to assess the cumulative impacts.

The Scoping Report states that the 'Rochdale Envelope' will be adopted, which allows the Environmental Statement to assess a reasonable worst-case scenario but allow for some flexibility as some elements of the project may change through the process. The Environmental Statement should make it clear where flexibility is sought and justify the maximum development parameters.

Two options are currently being considered for the haul road. Very limited information has been provided on why these two options have been chosen and what other alternatives have been ruled out. Several matters, including the turbine layout and number of turbines, remain under consideration. The Environmental Statement should include a presentation of the alternatives, for instance alternative turbine layouts, numbers and heights, and explain the reasons for ruling those out, including a comparison of environmental effects.

A number of references to Scottish guidance and studies are provided within the Scoping Report. These should only be used where English guidance and studies are not available and the applicant should ensure that the guidance/studies are appropriate for the proposed development, providing justification where necessary.

NYC published a report in 2025 '[Guidance for Nationally Significant Infrastructure Projects](#)'. The Applicant should review the information in this report and use it to inform their Environmental Statement.

ENVIRONMENTAL ASPECT COMMENTS

Topics to be scoped in:

Landscape and Visual

The site is partially located within the Durham locally designated Area of High Landscape Value¹ and approximately 0.7km to the closest boundary of the Yorkshire Dales National Park. The site is located within the open moorland of Hope Moor at a height of 503m above sea level.

Key transport corridors within the wider area include the A66 and A67 to the north, the A684 to the south, and the A1(M) to the east. Other roads tend to be rural in character. Recreational routes include the Teesdale Way, Pennine Way, NCN Route 71, and locally promoted trails such as the Barningham Trail. The site does have public rights of way's running through the eastern part as well as along the north and eastern boundaries.

The report states there are eight residential properties within 1.75km of the Scoping Boundary. The nearest villages and hamlets are Newsham (146 m), Barningham (883 m), Dalton (1.9 km), Scargill (2.4 km), Washfold (2.3 km), Helwith (2.4 km), Hurst (2.5 km), Gayles (3.3 km), Booze (3.5 km), Langthwaite (4.1 km), Arkle Town (4.3 km), and Whaw (4.8 km).

We would expect the production of the Landscape and Visual chapter of the Environmental Statement, which would be in the form of a Landscape and Visual Impact Assessment (LVIA), and any supporting information (such as plans or figures) to reflect current best practice and guidance from, as a minimum, the following sources:

- '*Guidelines for Landscape and Visual Impact Assessment*', (GLVIA3), April 2013 by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA);
- '*An Approach to Landscape Character Assessment*', Natural England (2014);
- '*Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals*', 17th September 2019 by the Landscape Institute (LI);
- '*Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)*', 10th January 2020 by the Landscape Institute (LI); and
- '*Technical Guidance Note (TGN) 2/21 Assessing landscape value outside national designations*', May 2021 by the Landscape Institute (LI).

At this initial stage of the NSIP process, the content and level of information provided by the developer within *Chapter 5* (Landscape and Visual), and *Figures 5.1 to 5.12* are generally considered satisfactory, however, we would expect to discuss this content and approach as part of the iterative process.

Viewpoints

Field surveys and Zone of Theoretical Visibility's (ZTV) have been used to determine a study area of 45km. Following a desk-based assessment, the 45km extent to the study area appears to be acceptable. Figures 5.2 to 5.6 and table 5.3 of the scoping report identifies 18 proposed viewpoints across the study area. The locations of the current 18 appear to be appropriate for closer scrutiny of sensitivity, however the final locations are to be agreed with NYC and other relevant stakeholders. Having undertaken a desk-based assessment and studied the ZTV's, alongside the study area characteristics, we suggest that these viewpoints need to be supplemented by additional ones at further distances to the east and southeast. The viewpoints currently identified underrepresent locations east towards the A1M beyond 20km.

Photomontages

¹ [Areas of High Landscape Value](#)

To gain an understanding of the visibility of the development and how the turbines and infrastructure would appear in the surrounding landscape, Photomontages/Accurate Visual Representations (AVRs) should be produced. It is currently proposed to develop viewpoints within 20kms as photomontages; however, it is not clear the justification for the selection of distance as an arbitrary extent for photomontage production. Given this criterion there are currently no proposed photomontages to the east or southeast of the site despite the ZTV suggesting theoretical visibility.

The number and location of the agreed viewpoints to be developed as Photomontages/AVRs should be agreed with NYC and other relevant stakeholders and produced in accordance with TGN 06/19 Visual Representation of Development Proposals. At this stage, it is deemed appropriate that these should be produced to illustrate the proposals at different phases: Existing Situation (baseline), Operational (year 1) and Residual (10 to 15 years). The Photomontage/AVR Level and Type is to be discussed and agreed.

The visual assessment should include for visual receptors, and not just an assessment of any agreed viewpoints. It should also clearly cross reference viewpoints to associated receptors.

Methodology

Chapter 5, section 5.4 of the Scoping Report considers landscape and visual matters in detail, it is supplemented by figures 5.1 to 5.12, (Scoping Report Volume A: figures). This section provides a description of the assessment criteria and methodologies; these are derived from best practice guidance documents and will accord with 'Guidelines for Landscape and Visual Impact Assessment: Third Edition' ('GLVIA3').

The section explains the topic specific divergence from the broader methodology considered in chapter 3. At this stage there has been no consultation regarding methodology for the LVIA. The approach for consultation with statutory consultees is detailed in section 5.4.14. This will include the viewpoint selection, photography, approach to assessment and the cumulative assessment. Our comments on the scoping report will form part of the consultation process.

A study area of 45km has been determined by a combination of desk based and site survey work. Given the size and number of turbines alongside the baseline characteristics, the study area is consistent with best practice, and this is supported by the ZTV diagrams (Figures 5.2 to 5.9). The LVIA shall determine the likely significant effects that the Project would have on the landscape and visual resource. Paragraph 5.4.6 confirms the degree of effect while paragraph 5.4.7 clarifies that moderate effects could be both considered as significant or not significant, depending on the sensitivity and magnitude of change factors evaluated. We accept that matrices should be used as a guide to aid professional judgement, however the assessment methodology needs to be consistent and clearly explained with a reasoned justification and transparent assessment that considers all contextual matters such as landscape character, receptors and experience.

Policy, Legislation and Relevant Guidance is considered in section 5.4.10 and we agree that this shall be an adaptive list as the design evolves.

The provision for future baseline data assessment is detailed from section 5.4.11, this includes further desk based and site-based assessment to inform the LVIA and the evolving site design.

Landscape Character

The site sits within three National Character Areas (NCAs) as detailed in paragraph 5.6.8. It is stated, due to geographical constraints, that theoretical visibility of the project shall be greatly reduced beyond 10km to the south and 20km to the north and west. To the east, theoretical visibility is expected to diminish beyond 20km within the lower lying Tees Valley NCA given the layering of vegetation. Whilst we consider this to be a valid assumption, we would wish to see additional viewpoints to the east and southeast to confirm the desk-based assessment work.

The site is located within LCA 33 Gritstone High Plateau which is characterised by a flat upland plateau comprising blanket peat with an expansive undeveloped character resulting in a strong sense of tranquillity and remoteness. Multiple viewpoints are located within the LCA

predominantly within 10km of the scoping boundary, where theoretical visibility is greatest. Given the potential for visibility beyond 10km within the LCA we would seek to consult on the final selection of viewpoints.

To align with GLVIA3 the LVIA should include an assessment of landscape effects at a range of scales and include a finer grain landscape assessment that includes the Site and immediate area and that also considers individual landscape elements such as trees and hedgerows, woodlands, ponds/water features, or historic landscape features.

Landscape Designations

National landscape planning designations are located within the study area, however, the project site does not lie within any national designations. The closest designation is the Yorkshire Dales National Park. We defer to the Yorkshire Dales National Park Authority on whether additional viewpoints are required in this regard.

The northern section of the site is located within an area of Higher Landscape Value (Durham County Council), which is land recognised for its distinctive, high-quality landscape features, warranting conservation and careful management. There are several viewpoints located within this designation. We defer to Durham County Council on whether additional viewpoints are required in this regard.

Table 5.2 presents a preliminary assessment of landscape designations providing dialogue to justify the inclusion or omission from detailed assessment within the forthcoming LVIA. We are generally in agreement with the findings of the table given the design parameters at scoping stage presenting the worst-case scenario threshold. We would seek to remain in consultation over this matter as the design evolves.

Visual receptors and visual amenity

Table 5.3 lists the preliminary viewpoints; as stated, we do consider the merit in including additional viewpoints particularly to the east and south-east. We would seek to continue consultation on the micro siting of the selected viewpoints particularly those within 20km which will include photomontages.

Cumulative effects

Cumulative impacts for consented and proposed windfarms will be considered alongside other forms of major development. Given the proximity of major roads such as A66 and A1/M there is potential for sequential effects. The assessment will include wind turbine developments with a height above 50m and non-wind national infrastructure projects within 45km from the project. The closest existing windfarm is 30km from the project. There are 1 consented development and 2 applications within the study area which will be assessed.

We consider the approach to assessing cumulative effects is satisfactory at this stage but would seek continued dialogue on this matter.

Mitigation and Layout

As this is an iterative process, at this stage no mitigation measures have been considered in detail. The areas identified as locations for the turbines and associated infrastructure are broad and certain aspects of the design remain to be finalised. Likewise, the area identified as potential haul route is of significant size. The impact on receptors should be used to inform the design of the proposals. The mitigation should reflect the open character of the study area.

Archaeology and Cultural Heritage

Section 6 of the Scoping Report relates to Archaeology and Cultural Heritage. This references national and local policy, good practice guidance and outlines the intended approach in respect to the assessment of the proposed development and its potential impacts on the setting and significance of heritage assets.

From a review of the submissions and consultation with the County's Historic Environment Record, the project site does not contain any listed buildings, nor is within a Conservation Area. However, the site is located within proximity to a large number of designated heritage assets whose setting and significance has the potential to be impacted. The submission seeks to scope out the majority of built heritage assets which NYC consider to be unacceptable at this stage.

The Council's Principal Conservation Officer has been consulted on the Scoping Opinion and considers that the following Conservation Area and listed buildings should be scoped in to the Cultural Heritage Assessment within the Environmental Impact Assessment:

- Newsham Conservation Area – lies on the 5km ZTV boundary with the access and haul road proposed to go through Newsham village. It is therefore considered the scheme has the potential to disturb and impact the significance of the asset particularly during the construction phase of the development.
- Grade II Listed Buildings – Foxgrove, Moor Lane, Newsham; Earby Hall, Moor Lane, Newsham and Hill Top, Moor Lane, Newsham. All of these listed buildings lie within or in close proximity to the 5km ZTV which includes the proposed development site and the proposed access corridor. It is therefore considered that the development has the potential to impact the setting and significance of the identified listed buildings.

In undertaking the Cultural Heritage Assessment, it is imperative that the proposed development is illustrated in context with the heritage assets incorporating views and prospects from, to and through the site, to determine the intervisibility between the heritage assets and the proposed development and the degree of impact on the setting of the heritage assets.

The application should also include section drawings through the site illustrating the proposed development and its relationship with the heritage assets (where necessary). This is of consideration in this instance given the size and scale of the development proposals.

The Cultural Heritage Chapter should contain a comprehensive assessment of the implications of the development proposals on the heritage assets and their setting (in accordance with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990; and NPPF, Chapter 16.

The Assessment should also include recommendations and mitigation measures which seek to ameliorate and lessen negative impacts on the designated heritage assets providing alternatives where necessary.

Archaeology

The Council's Principal Archaeologist raises concerns regarding the borrow pits and that they might have a disproportionately harmful impact on the archaeological resource that could be avoided by importation of material from off site. This must be balanced against the aims of minimising environmental and transport network effects.

Section 2.2.8 refers to Non-Designated Heritage Assets (NDHAs) and the term is then frequently used elsewhere in the document. NYC would recommend that this term is only applied to archaeological sites, monuments or structures/buildings that have been specifically identified by a plan making body as having a degree of significance meriting consideration in planning decisions (see Historic environment - GOV.UK paragraphs 039 to 041), e.g. through inclusion in a local list or neighbourhood plan. It should not be assumed that every item listed on the North Yorkshire Council Historic Environment Record is an NDHA as our records include destroyed monuments, poorly provenanced finds or historic features of only minor interest such as former quarries. We would, however, recommend that the applicant's proposed assessment methodology makes suggestions for 'candidate NDHAs' which can be then considered by the Local Authority.

An Archaeological Management Plan should form part of a Construction Environment Management Plan and should set out the various proposals for mitigation.

The Council's Archaeologist questions whether Table 5.3 should include a view from the top of the Castle Keep at Richmond Castle which is publicly accessible and provides expansive views from height from within the heart of the Richmond Conservation Area. Should the wind turbines be visible from this critical local viewpoint, it should be included.

Paragraph 6.1.1 sets out a hierarchy of cultural heritage assets. We would recommend that further bullet points are added for other archaeological sites not meeting the criteria of NDHAs and also geoarchaeological deposits including the local peats (including those formed in sink holes).

We agree with the proposed scope of the Cultural Heritage Impact Assessment set out in 6.1.2 and we are pleased to see the inclusion of opportunities for enhancement. This is taken further in para. 6.5.3 which includes an aspiration for public benefit.

We note the proposal for a detailed walkover survey (para. 6.4.12) and this will be imperative for improving our understanding of the archaeological landscape which is currently not well understood due to a lack of previous investigation. We would recommend that one aspect of the detailed walkover survey would be to identify geoarchaeological zones to help define a deposit model for the study area. There will undoubtedly be areas of very high archaeological potential as identified through extant sites such as the Scheduled Monument but also areas of low archaeological potential, i.e. areas where all superficial deposits have been removed such as areas of eroded bedrock or former quarries. Areas of peat will have a high archaeological potential as will any early mineral soils that might include discrete evidence for early colonisation by prehistoric hunter-gatherers, such as flint scatters, fire pits and stake holes from early camps.

The Scoping Report goes on to mention that 'field surveys' will be carried out (para. 6.4.32). The study area is an extensive moorland area where archaeological visibility is expected to be low. For this reason, the applicant should consider more novel, landscape based, assessment techniques. We would recommend that the following are considered: -

- An assessment of the archaeological potential of the local peat deposits to preserve data on past environments, climate and archaeological remains. This might involve an augur survey, coring and subsequent palaeoenvironmental assessment and dating. This would apply to blanket peats and also those that have formed in sink holes.
- Measured archaeological survey of any features of industrial archaeological interest including lead mining remains, limekilns etc.
- UAV/drone-based surveys using high definition LIDAR and multi-spectral imaging may be a useful and rapid technique that can also inform other aspects of the proposal.
- Geochemical survey may be helpful for identifying both prehistoric and later lead mining remains.
- More traditional archaeological field evaluation such as test pitting or geophysical survey to assess the archaeological potential of the area, particularly for prehistoric remains that would not otherwise be visible.

There is no objection to the UAV survey which might be required where physical access is not safe or possible.

The potential mitigation lists 'an archaeological watching brief during construction' (para. 6.5.4). This is now a rather outdated term which has been abandoned by The Chartered Institute for Archaeologists in their guidance notes. The term is now replaced by archaeological monitoring. We would also note that archaeological monitoring is quite low down in the hierarchy of mitigation techniques available and its use here might lower the expectation of the amount and complexity of the mitigation that could be required.

Paragraph 6.6.3 states that HER information will be repurchased ahead of the submission to check for updates. The Council's Archaeologist would be happy to discuss a HER enhancement project with our team to update our records for the study area prior to this repurchase. We would be happy to co-operate with the developers' archaeological consultants on this and to include any new information that has been identified from their initial studies.

Ecology and Ornithology

European Habitat Sites and Sites of Importance for Nature Conservation

The North Pennine Moors Special Area of Conservation (SAC) and Special Protection Area (SPA) are both proposed to be scoped into the Environmental Statement. It is proposed to prepare shadow Habitats Regulations Assessments to assist the Planning Inspectorate whom would be the competent authority with respect to the Habitats Regulations. NYC would like to see drafts when these become available so that we can provide comment.

The applicants propose to screen out of further consideration in the Environmental Statement all Local Wildlife Sites (LWSs) that are over 200 metres from the application site. We assume that this means that all LWSs that are less than 200 metres from the site would be screened in, but LWSs are not mentioned in Table 7 – 6 (the list of ecological receptors scoped in). No explanation for the 200 metre distance appears to be given and this seems a rather arbitrary distance to have chosen especially when it is acknowledged in the Report that aerial pollution needs to be considered in relation to the North Pennine Moors SAC which is a far greater distance than several LWSs. The LWS may play supporting roles to the Habitat Sites, and therefore, should not be discounted for simply being over 200m distance.

In North Yorkshire LWSs are designated as ‘Sites of Importance for Nature Conservation’ (SINC)s and there are seven SINC)s within 2 km of the application site including some where the features that have led to designation (e.g. semi-natural grassland habitats) are vulnerable to impacts from aerial pollution and from environmental changes affecting local streams. NYC would wish to see justification of the 200 metre ‘zone of influence’ for LWSs as well as the following SINC)s scoped into the Environmental Statement: Easegill Grassland SINC (code NZ00-33); Lockey Wood SINC (NZ00-24); Moresdale Beck Grassland SINC (NZ00-32) and Rispey Gill SINC (NZ00-18).

Habitats

One of the biggest concerns regarding the proposal is the potential impact it could have on peat reserves and peatland. We welcome the commitment from the applicant that they will take active steps to avoid siting turbines on ‘deep peat’ but wonder how this sits with the statement that “extensive areas of deep peaty soils, > 2.0 m in depth, are present across the western and central extent of the Wind Farm Array” (paragraph 10.3.9). Table 10-2 that reports the results from a ‘Phase 1 Peat Depth Survey’ conducted on a 100m x 100m grid basis indicates that nearly half (48%) recorded a depth of peat 31cm or greater. Usually, if the depth of peat is under 30cm, the habitat would not be classified as blanket bog, but it is possible for thinner layers of peat to be found which are still functionally part of the bog system or which could be habitat that is capable of being restored as Blanket Bog.

Blanket Bog (even in a degraded condition) is irreplaceable habitat as defined by the Environment Act 2021. As Natural England’s Technical Information Note 219 makes clear, Upland Heathland can occur on degraded blanket bog – which means that there may be significant depths of peat beneath heathland habitat which may be deemed to be irreplaceable blanket bog as a result. One practical consequence of this observation is that a thorough high resolution peat depth survey is really essential in relation to this proposal because one cannot rely on the fact that Upland Heathland vegetation predominates to conclude that there is no significant depth of peat beneath the ground at this point. At the present time, the indicative locations for wind turbines mapped onto habitat data (as in Figures 7.4.1 to 7.4.7 inclusive) show not only instances where turbines are situated amidst blanket bog (such as ‘T12’) but also locations in areas characterised as Upland Heathland (e.g. ‘T23’) that are close to blanket bog and may actually be this habitat (for the reason given above). Similar considerations may apply to areas mapped as Upland Acid Grassland in the NVC mapping.

Species

Brown Trout - This species is scoped in according to Table 7-6 in relation to cumulative impacts, but not, apparently to be considered otherwise. NYC recognises the importance of small upland streams as hatcheries for a variety of fish species and wishes that Brown Trout (as a representative sensitive species) be considered more widely in the Environmental Statement.

Reptiles and amphibians – The data supplied by North and East Yorkshire Ecological Data Centre includes a significant number of 2009 records from Holgate Moor of reptiles (Common Lizard, Slow-worm) and amphibians (Common Frog, Common Toad and Palmate Newt). However, it is proposed that reptiles and amphibians be scoped out of consideration on the basis that if measures outlined in Table 7-5 are undertaken there is unlikely to be an impact. NYC considers that it should be established through survey what is the extent of any populations that might be present so that the impacts of the proposals (in terms of habitat loss and fragmentation) can be assessed in the light of up to date information. We note that the SINC criteria in operation at the moment indicate that a SINC may be designated if as few as two reptile species can be shown to regularly use it.

Nightjar – Breeding territories have been recorded within The Stang woodland, which is outside of North Yorkshire, but which is partially included within the application site. The Ecology Team notes that Nightjar is proposed to be scoped out of the Environmental Statement despite turbine locations proposed on the edge of the plantation (T7 and T8) and one close by (T11). We consider Nightjar should be scoped into this Chapter.

Barn Owl – In section 8.3.46 it is indicated that evidence has been found of breeding/roosting within the application site by this Schedule 1 protected species. It is proposed to exclude this species from the Environmental Statement on the basis that it displays low sensitivity to displacement or collision mortality at wind farms. It is unclear what evidence has been found of Barn Owl presence so we would ask that it be kept in the Environmental Statement at present and we would point out that there are other potential impacts of the development (e.g. the haul road and infrastructure away from the moorland) that could have a detrimental impact depending on where the roost site is located and foraging resources for the species in the area.

Further survey work / information

In various places in Chapter 7 & 8 the following additional information is proposed to be included within the application:

- River Condition Assessment (survey to take place in 2026);
- Bat Activity Survey (2026);
- Updated walkover survey to confirm baseline data remains valid for the purpose of Environmental Statement (2026);
- Bird Surveys as set out in Table 8.8 of the report (2026);
- Shadow HRA;
- Outline Construction Environmental Management Plan (CEMP) that will contain a Biosecurity and INNS Management Plan (BIMP) and a Bird Disturbance Management Plan (BDMP);
- Outline Landscape and Ecology Management Plan (LEMP);
- Outline Operational Phase Environmental Management Plan (OPEMP);
- Outline Peat Management Plan (PMP);
- Peatland Condition Assessment; and
- Peat Landslide Hazard and Risk Assessment.

NYC considers all of the above to be pertinent and relevant to the Ecological Impact Assessment aspects of the Environmental Statement and would wish to be given the opportunity to contribute and comment on these. In addition (as set out above) we would like to see a reptile and amphibian survey at least of Holgate Moor. We would like to be provided with a complete list of the ecological surveys undertaken to date in relation to this proposal and to have sight of these. This may prompt further comments concerning the adequacy of work undertaken so far.

NYC recommend night-time surveys of the moorland to see what use birds make of it, which would reveal aspects of bird usage that might be disrupted by the development (and associated lighting). For example if there is a part of the moor that is used by birds for night-time roosting this would not necessarily be obvious from daytime surveys.

Specific survey and data relating to the presence and locations of badgers, rare birds and plants should be provided in a confidential annex.

Trees

The main development area for the wind farm within NYC jurisdiction is an area where there are a limited number of trees. However, one of the options for the proposed haul route will pass adjacent to an ancient woodland located on Barningham Park. Assessment of the potential impacts of the ancient woodland will require inclusion within the Environmental Statement. Surveys of the proposed haul route will be required to identify any ancient or veteran individual trees and where these are identified, the impact to these trees will also require inclusion within the ES.

All other arboricultural matters can be addressed through the submission of appropriate arboricultural reporting outside the Environmental Statement.

Hydrology and Hydrogeology

The Scoping Report sets out that a Flood Risk Assessment will be undertaken based on the requirements of the NPPF. Guidance for developers can be found on our website at: [Sustainable drainage systems guidance - 2022 update | North Yorkshire Council](#)

If there are any works proposed as part of this application which are likely to affect flows in an ordinary watercourse, then the applicant is likely to need approval of the County Council (or appropriate Internal Drainage Board). In line with good practice, the Council seeks to avoid culverting, and its consent for such works will not normally be granted except as a means of access.

Further advice on best practice measures expected to be incorporated into the design and management of wind farms can be found within the Lead Local Flood Authority's response at Appendix 1.

Geology, Soils and Ground Conditions

The Scoping Report confirms that no land within the study area has been formally determined as contaminated under Part 2A of the Environmental Protection Act 1990. However, a number of potential risk sources have been identified. The Scoping Report appropriately identifies the need to assess potential risks to human health, the wider environment, soil and peat disturbance during construction and geotechnical constraints influencing design.

The approach is currently framed primarily in terms of environmental protection and ground engineering, rather than explicitly within a contaminated land risk framework. These should not be treated as mutually exclusive.

It is welcomed that a desk-based Phase 1 Geo-Environmental Site Assessment incorporating a Preliminary Land Quality Risk Assessment is proposed. This should be undertaken in accordance with the Environment Agency's Land Contamination Risk Management (LCRM) guidance and adopt a risk-based approach structured around the pollutant linkage model (source–pathway–receptor).

The assessment should:

- Identify and assess potential contaminant sources within the site footprint and any temporary construction areas
- Clearly establish potential pollutant linkages
- Consider risks to:
 - construction workers
 - controlled waters
 - off-site receptors, where relevant
- Determine the need for any further intrusive investigation or remediation.

The outputs of the assessment should be appropriately integrated with the Construction Environmental Management Plan (CEMP) and any peat management strategy.

The inclusion of investigations relating to Private Water Supplies (PWS) is supported, and appropriate design measures should be implemented to avoid any adverse impacts on these

receptors. Potential construction-phase impacts associated with soil and peat disturbance should be fully scoped into the Environmental Impact Assessment.

The North Yorkshire Minerals and Waste Joint Plan 2022 is not referenced in the 'Relevant Policy, Legislation and Relevant Guidance' section. Part of the site is within a mineral safeguarding zone and therefore a Mineral Resource Assessment will be required in line with the requirements of policies within the Joint Plan.

The Scoping Report notes that the Agricultural Land Classification (ALC) for England identifies the site as predominantly Grade 5 with some Grade 4 and Grade 3. Paragraph 10.3.16 states that the mapping indicates there is no Grade 1 or 2 land present on the site and on this basis, the Site is not considered to comprise Best and Most Versatile agricultural land (BMVAL). However, Grade 3A is also BMVAL (not just Grade 1 and 2). This mapping should only be used for general guidance and not for use in assessment of individual fields. A definite ALC should be obtained by undertaking a detailed survey on site.

Access, Traffic and Transport

The Scoping Report has included a table of matters to be scoped in and out of the ES. NYC is content with the approach taken.

NYC agree the construction phase to be the worst case scenario and, therefore, it is reasonable to assume that the decommissioning stage would be less impactful, as it is likely to generate fewer vehicle movements than the construction phase. However, NYC do consider that the decommissioning stage should be scoped in to fully assess the impact of the development.

The Applicant is investigating two options to manage construction traffic and to reliance on the local road, by creating a dedicated haul road from Barningham Road. The two potential options are:

- Option 1: A haul route linking Barningham Road to Moor Lane, from where construction traffic would continue to the main wind farm site.
- Option 2: A direct haul route linking Barningham Road to the main wind farm site.

The final route will be informed by environmental and engineering surveys.

The A66 Trans-Pennine Route was granted a Development Consent Order and is scheduled for upgrading to dual carriageway status and the timing of these works will need to be monitored by the Applicant, as works on the A66 upgrade have the potential to impact on abnormal load movements associated with the wind farm. Furthermore, the Applicant will need to review the transport route for bridges and structures which may require Bridge Assessment / Strengthening Work to manage abnormal load movements and prevent risk to structural assets.

The feasibility of using 'on-site borrow pits' to extract materials in sufficient quantities to serve the project will need to be demonstrated, prior to the production of the Transport Assessment, as the availability of on-site material will likely ameliorate the number of construction related trips on the highway network. However, the Council's Principal Archaeologist's has raised concerns regarding the borrow pits and therefore the environmental impacts of both options needs to be assessed and compared.

The Highway Authority considers that the application site might benefit from an on-site concrete batching plant to reduce construction traffic trips on the road network, however, this will need to be balanced against other environmental considerations.

NYC would recommend the Construction Traffic Management Plan to include the requirement for all deliveries to and from site to be recorded with the date and time in/out plus the vehicle registration plate details, and this must be available for inspection NYC/DCC at any time.

With regards to Q11.2, the village of Newsham will be a sensitive receptor, plus any properties that are located adjacent to the proposed construction traffic route. The Applicant will need to seek the view of National Highways in respect of the A66/Smallways junction and NYC are not aware of any committed developments which will cause a significant cumulative impact.

The Local Access Forum raise concerns regarding the effect of the construction traffic on the safety of those vulnerable road users (walkers, cyclists, horse-riders) on Moor Lane who value the lightly used route. Moor Lane is an integral part of the network linking several rights of way and the Local Access Forum advise that Moor Lane is not a suitable access route.

It is proposed to scope in construction and operational and maintenance impacts on the PROW. It has been acknowledged that a number of PROW's will need to be closed during the construction phase – such closures should be kept to a minimum and alternative routes provided. Where possible, access routes for construction and maintenance should not utilise existing PROW. We do not support any blades over sailing any PROW, and the turbines should be placed at such a distance from each PROW to ensure that there would be no risk to users from topple events, blade disintegration or ice throw. The turbines should be located at a distance of twice the tip height for public footpaths, and three times the tip height for public bridleways.

The site also comprises Open Access Land so informal 'roaming' rights exist. These must be taken into account in the relevant Chapters of the Environmental Statement.

Noise and Vibration

The Scoping Report identifies the potential for likely significant effects arising from construction, operational/management and decommissioning phases of the development.

Impacts proposed to be scoped into the assessment include construction activities, including construction vehicle movements, potential effects due to noise from wind turbines, potential effects due to noise from ancillary electrical infrastructure and potential cumulative effects due to noise from existing or proposed wind turbines within 10km of the project.

Impacts proposed to be scoped out include operations road traffic noise, operational vibration, infrasound, low-frequency noise, tonal noise and excess amplitude modulation (AM).

Current national policy and guidance for wind turbine noise assessment indicate that specific assessments of infrasound, low-frequency noise and excess AM are not generally required at the planning stage for proposed onshore wind energy developments. These effects fall outside the scope of ETSU-R-97 and the Institute of Acoustics Good Practice Guide (IoA GPG) methodology. Consequently, detailed assessments of these matters, and the application of pre-emptive planning conditions relating to excess AM, are typically scoped out of the Noise Impact Assessment. Instead, appropriate control is achieved through compliance with ETSU-R-97 noise limits and site-specific operational noise conditions attached to any planning permission.

Therefore, the Council agrees that these matters need not be considered within the assessment of operational noise impacts.

With regards to the proposed methodology, the use of BS 5228:2009+A1:2014 Parts 1 and 2 for the assessment of construction noise and vibration is supported. The assessment should identify all noise-sensitive receptors, evaluate the significance of effects, and set out appropriate mitigation measures, including any commitments to working hours, plant selection, traffic routing and construction management measures.

The assessment of operational wind turbine noise in accordance with ETSU-R-97 and the Institute of Acoustics Good Practice Guide is welcomed. Baseline noise monitoring locations and methodologies should be clearly justified and representative of the nearest and most affected noise-sensitive receptors.

The proposed assessment of operational noise from ancillary electrical infrastructure in accordance with BS 4142:2014+A1:2019 is supported. The assessment should consider all fixed plant and associated equipment and include details of any acoustic mitigation required to achieve acceptable noise levels at nearby receptors.

The Council also supports the proposed cumulative noise assessment and welcomes the assessment of cumulative operational wind turbine noise from existing, consented and proposed

wind energy developments in accordance with ETSU-R-97 and the Institute of Acoustics Good Practice Guide.

We welcome the proposed outline Construction Environmental Management Plan (CEMP) including a separate outline Dust Management Plan (DMP) and outline Materials Management Plan (MMP).

The proposed approach to the Construction Phase Dust Assessment is noted and is broadly consistent with the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust from Demolition and Construction. The assessment methodology identifies relevant human and ecological receptors within the applicable study areas and proposes a risk-based assessment of dust-generating construction activities.

The proposed inclusion of mitigation measures within an Outline Construction Environmental Management Plan (CEMP) is welcomed. The CEMP should include, as a minimum:

- Measures to suppress and control dust generation and track-out from construction traffic.
- Appropriate management of stockpiles and exposed surfaces.
- Procedures for monitoring and responding to dust complaints.
- Identification of responsible personnel and site management procedures.
- Arrangements for reviewing and adapting mitigation measures should dust impacts arise during construction.

Subject to the submission of a robust assessment and the implementation of proportionate mitigation measures through a suitably conditioned CEMP, it is anticipated that construction dust effects can be adequately controlled and reduced to an acceptable level. Therefore, the scope of the proposed Construction Phase Dust Assessment is considered acceptable.

Aviation, Radar and Telecommunications

NYC defer to the relevant consultation bodies for this Chapter.

Shadow Flicker

The Scoping Report highlights that shadow flicker effects are only possible when the wind turbine blades are rotating and, therefore, it is appropriate to scope this matter out of the construction and decommissioning phase assessment.

Air Quality

The proposed scope for air quality assessment is generally considered to be proportionate and appropriate. The focus is on construction phase dust emissions and construction phase traffic emissions, which is consistent with IAQM/EPUK guidance and reflects the likely risk profile of the development. However, scoping out decommissioning emissions by saying it is 30 years in the future and vehicles will be cleaner is not considered to be appropriate. Therefore, such emissions should be considered and a precautionary approach taken, as they form part of the life of the development.

Operational air quality impacts have been scoped out which is considered to be acceptable given the nature of the proposals.

Carbon and Climate Change

North Yorkshire Council's Climate Change Strategy 2023-2030 is not listed within the 'Relevant Policy, Legislation and Relevant Guidance' section; recommended this is included.

Topics to be scoped out:

Socio-economics and Tourism

The Applicant intends to scope this matter out of the Environmental Statement and provide a standalone report covering socio-economics and tourism. NYC strongly disagrees and considers

that this should be scoped in and consideration should be given to the impact during all stages of the development.

The site is located within a wider upland landscape that supports tourism and recreational activity, including walking routes and outdoor experiences. The primary tourism consideration relates to potential landscape and visual impacts, which may affect the character and perception of the area and the quality of visitor experience. Construction activity (and decommissioning activity) may also result in temporary disruption through increased traffic and reduced accessibility.

The Visit North Yorkshire Destination Management Plan (2024-2034) highlights that North Yorkshire's visitor economy is underpinned by high-quality landscapes, tranquillity and outdoor experiences. Data from a Stakeholder Survey found that a major strength is landscapes and countryside with an overall score of 9.32 out of 10 – 75% felt the countryside offer of North Yorkshire is unique and 83% felt the landscapes and countryside can attract out of region visitors.

As such, it is likely that landscape and visual impacts will affect these assets and the visitor experience in North Yorkshire. Socio-economics and Tourism should therefore be scoped into the Environmental Statement.

Human Health

It is noted that the applicant has scoped out Human Health as a stand-alone chapter as these matters will be picked up within the corresponding technical chapters associated with air quality, noise, access, traffic, landscape and socioeconomics. NYC disagree with this approach and consider that the Environmental Statement should include a standalone Human Health chapter.

As well as considering health factors individually, the assessment must also appropriately consider the cumulative effect of these individual health impacts on human health (which will include those from across all chapters of the assessment).

The assessment on human health must be carried out using an industry standard methodology. This would be The Institute of Environmental Management and Assessment (IEMA) Guide to Determining the Significance for Human Health in Environmental Impact assessment.

The chapter on Human Health should use the North Yorkshire Joint Strategic Needs Assessment 2024 which has up to date information on population health.

Effective community engagement can act as a mitigation measure and contribute to reducing some of the mental and physical health impacts that can occur as a result of worry, fear, stress and anxiety arising from the application within the community and the population. The application could consider the Government's document [Community Benefits Guidance for Onshore Wind in England](#) when developing a community engagement plan for this application.

Further information including methodology, monitoring and post-decision expectations can be found on pages 75 – 81 of North Yorkshire Council's Guidance for Nationally Significant Infrastructure Projects 2025.

Appendix 1

INTERNAL CONSULTEE RESPONSES RECEIVED

Arboriculture
Archaeology
Conservation
Ecology
Economic Development
Environmental Health
Landscape
Lead Local Flood Authority
Local Access Forum
Local Highway Authority
Public Health
Public Rights of Way

Arboriculture

To: Planning Services

From: Director of Community Services
(Arboricultural Section)

Your Ref:

Our Ref: ZD26/00360/EIASC

Date: 10/06/2026

Proposal - EIA Scoping and Consultation and Regulation 11 notification
Hope Moor Onshore Windfarm

My comments on the above application are as follows:

The main development area for the wind farm within NYC jurisdiction is located in an area where there are no to limited trees. No statutory designated woodlands are located within the main development area.

The main concern will be the proposed haul route as this will pass adjacent an ancient woodland located on Barningham Park. Assessment of the potential impacts of the ancient woodland will require inclusion within the Environmental Impact Assessment. Surveys of the proposed haul route will be required to identify any ancient and veteran individual trees. Where these are identified, the impacts to these will also require inclusion within an EIA.

All other arboricultural matters can be addressed through standard consultation and through the submission of appropriate arboricultural reporting.

Under the councils emerging Tree & Woodland Policy applications will be considered in line with BS5837:2012 and evolving best practice. All applications are considered under the *Avoid, Mitigate and Replace* principle.

Where development includes trees on or adjacent to the site there will be a requirement for the following in line with BS5837:2012:

- Tree Survey (Section 4.4)

A tree survey will be required and must be undertaken in line with standard survey requirements. The survey must identify all trees that may be affected by the proposed development and provide sufficient detail to inform site layout, design, and decision making.

- Arboricultural Impact Assessment (AIA – Section 5.4)

An Arboricultural Impact Assessment will be required and must be prepared by a suitably qualified arboricultural specialist. The AIA must critically assess the relationship between the proposed development and existing trees and must demonstrate that obvious conflicts have been avoided at the design stage, including, where possible, the removal of built form from Root Protection

Areas. Applications must include a Constraints Plan clearly identifying areas that cannot form part of the proposed built development, including Root Protection Areas, access arrangements, internal highway and footway networks, drainage infrastructure, and other relevant physical or design constraints.

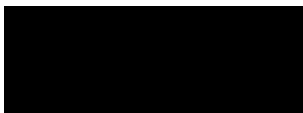
- **Arboricultural Method Statement (AMS – Section 6.1)**

Where impacts on retained trees cannot be fully designed out at the AIA stage and are considered to have overriding planning justification (as confirmed through planning officer guidance), an Arboricultural Method Statement will be required. The AMS must set out detailed tree protection measures and construction methodologies, including any specialist techniques necessary to safeguard retained trees throughout demolition and construction.

Planning applications will be considered on the pretext that in the most part trees are retained given the value they add to considered development proposals. The arboricultural team will, at the basic assessment level, consider the following:

- No loss of healthy trees or hedges unless there is an overriding planning justification
- Default position is that no works will be supported within the root protection areas of retained trees unless there is an overriding planning justification
- Retain trees to consider future growth reducing conflict over the long term with residents by providing space to grow
- New streets should be tree lined to consider, within the design, above and below ground options that minimise harm to the highway's infrastructure, and developments should incorporate additional planting with adequate long term maintenance arrangements.

Signed



Date 10/06/2026

Archaeology Comments

Comments from  Principal Archaeologist 23rd June 2026

I have read the Environmental Impact Assessment Scoping Report (EN0110038; May 2026) and have paid particular attention to the chapter concerning 'Archaeology and Cultural Heritage' (Chapter 6).

I note that the Scoping Report gives a detailed description of the development, including temporary works including borrow pits (Para. 1.1.3) and environmental offsetting areas (Para. 1.1.4). I assume that the impact of all aspects of the development will be fully assessed as part of the EIA process. I am however particularly concerned that borrow pits might have a disproportionately harmful impact on the archaeological resource that could be avoided by importation of material from off-site. This potential harm should be balanced against the aims of minimising environmental and transport network effects (para. 2.5.34).

Section 2.2.8 refers to Non-Designated Heritage Assets (NDHAs) and the term is then frequently used elsewhere in the document. I would recommend that this term is only applied to archaeological sites, monuments or structures/buildings that have been specifically identified by a plan making body as having a degree of significance meriting consideration in planning decisions (see [Historic environment - GOV.UK](#) paragraphs 039 to 041), e.g. through inclusion in a local list or neighbourhood plan. It should not be assumed that every item listed on the North Yorkshire Council Historic Environment Record is an NDHA as our records include destroyed monuments, poorly provenanced finds or historic features of only minor interest such as former quarries. I would however recommend that the applicant's proposed assessment methodology makes suggestions for 'candidate NDHAs' which can be then considered by the Local Authority.

Starting at section 2.6.9 the Scoping Report sets out the potential scope of a Construction Environment Management Plan. I would recommend that an Archaeological Management Plan forms part of this document and sets out the various proposals for mitigation (such as setting out archaeological exclusion zones).

I support the proposals for technical engagement (para. 3.13.5) with the various specialisms and would be happy to attend and contribute to any meetings or workshops as appropriate.

With regards to Q3-1, I agree that Archaeology and Cultural Heritage should form a chapter of the EIA.

I am assuming that my colleagues in Landscape and the Built Environment (Conservation Officer) will be providing input. I would however question whether Table 5.3 should include a view from the top of the Castle Keep at Richmond Castle which is publicly accessible and provides expansive views from height from within the heart of the Richmond Conservation Area (see also Q6-3 and Q6-4).

Paragraph 6.1.1 sets out a hierarchy of cultural heritage assets. I would recommend that further bullet points are added for other archaeological sites not meeting the criteria of NDHAs and also geoarchaeological deposits including the local peats (including those formed in sink holes).

I agree with the proposed scope of the Cultural Heritage Impact Assessment set out in 6.1.2 and I am pleased to see the inclusion of opportunities for enhancement. This is taken further in para. 6.5.3 which includes an aspiration for public benefit.

I note the proposal for a detailed walkover survey (para. 6.4.12) and this will be imperative for improving our understanding of the archaeological landscape which is currently not well understood due to a lack of previous investigation. I would recommend that one aspect of the detailed walkover survey would be to identify geoarchaeological zones to help define a deposit model for the study area. There will undoubtedly be areas of very high archaeological potential as identified through extant sites such as the Scheduled Monument but also areas of low archaeological potential, i.e. areas where all superficial deposits have been removed such as areas of eroded bedrock or former quarries. Areas of peat will have a high archaeological potential as will any early mineral soils that might include discrete evidence for early colonisation by prehistoric hunter-gatherers, such as flint scatters, fire pits and stake holes from early camps.

The Scoping Report goes on to mention that 'field surveys' will be carried out (para. 6.4.32). The study area is an extensive moorland area where archaeological visibility is expected to be low. For this reason, the applicant should consider more novel, landscape based, assessment techniques. I would recommend that the following are considered: -

- An assessment of the archaeological potential of the local peat deposits to preserve data on past environments, climate and archaeological remains. This might involve an augur survey, coring and subsequent palaeoenvironmental assessment and dating. This would apply to blanket peats and also those that have formed in sink holes.
- Measured archaeological survey of any features of industrial archaeological interest including lead mining remains, limekilns etc.
- UAV/drone-based surveys using high definition LIDAR and multi-spectral imaging may be a useful and rapid technique that can also inform other aspects of the proposal.
- Geochemical survey may be helpful for identifying both prehistoric and later lead mining remains.
- More traditional archaeological field evaluation such as test pitting or geophysical survey to assess the archaeological potential of the area, particularly for prehistoric remains that would not otherwise be visible.

The Scoping Report notes that a UAV survey (see para. 6.4.33 and Q6-1) might be required where physical access is not safe or possible. I have no objection to the use of this type of remote survey technique as noted in my bullet points above.

Paragraph 6.5.4 sets out potential mitigation for minimising impact. My previous point regarding suitability of borrow pits is also relevant here and where there is harm then a view should be taken on importing material from a more sustainable location.

The potential mitigation lists 'an archaeological watching brief during construction' (para. 6.5.4). This is now a rather outdated term which has been abandoned by The Chartered Institute for Archaeologists in their guidance notes. The term is now replaced by archaeological monitoring. I would also note that archaeological monitoring is quite low down in the hierarchy of mitigation techniques available and its use here might lower the expectation of the amount and complexity of the mitigation that could be required.

Paragraph 6.6.3 states that HER information will be repurchased ahead of the submission to check for updates. Although our resources are fairly committed due to the preparation of a new local plan, I would be happy to discuss a HER enhancement project with our team to update our records for the study area prior to this repurchase. We would be happy to co-operate with the developers' archaeological consultants on this and to include any new information that has been identified from their initial studies.

Conservation Comments

BUILDING CONSERVATION ADVICE

To: [REDACTED] Principal Planning Officer
From: [REDACTED] Principal Conservation Officer
Date: 11th June 2026

Reference: ZD/26/00360/EIASCR

Proposals: Request for EIA Scoping Opinion for proposed development of Wind Farm comprising no. 23 turbines (tip height of up to 200 m) and associated development including hardstanding areas, access tracks and site accesses, watercourse crossing, Haul Route for construction vehicles, on-Site substation(s) and compound(s), temporary construction compounds, batching plant, borrow pits, on-Site underground cabling, drainage, CCTV, fencing, anemometry mast(s), offsite street works to mitigation overrun and oversail, services and internal cabling work (indicative description).

Address: Hope Moor, south of Barnard Castle (County Durham), and north of Richmond (North Yorkshire).

POSITION

Methodology Satisfactory – subject to inclusion of the identified designated heritage assets.

REASON

Given the size, nature and scale of the development proposals and having regard to the proposed methodology as presented in the Scoping Documents, it is considered that Conservation Areas, and listed buildings whose setting and significance have the potential to be directly and indirectly impacted by the development, should be included in any Cultural Heritage Assessment.

LEGISLATIVE FRAMEWORK & POLICY CONSIDERATIONS

Planning (Listed Buildings and Conservation Areas) Act 1990

Section 66(1) requires the Local Planning Authority to have special regard to the desirability of preserving the listed building, its setting, or any features of special architectural or historic interest which it possesses.

Section 72(1) requires the Local Planning Authority to have special regard to the desirability of preserving or enhancing the character or appearance of a Conservation Area.

Richmondshire Local Plan (2012 - 2028): Core Strategy

Policy CP12 - Conserving and Enhancing Environmental and Historic Assets.

National Planning Policy Framework (December 2024)

Chapter 16 'Conserving and enhancing the historic environment'.

Under the terms of the NPPF, the Setting of a heritage asset is defined as "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."

National Planning Policy Guidance In accordance with the online practice guidance an assessment of an application for development which may affect the setting of a heritage asset, the local planning authority may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation (PPG, paragraph: 013, reference ID: 18a-013-20140306). Historic England guidance on 'The Setting of Heritage Assets' (2017) recognises: All heritage assets have significance, some

of which have particular significance and are designated. The contribution made by their setting and significance also varies. Although many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it. This capacity may vary between designated assets of the same grade or of the same type or according to the nature of the change. It can also depend on the location of the asset. For example, there needs to be an element of sensitivity of the setting and the capacity of the setting to accommodate change without harm to the heritage asset's significance or of views of the asset. This requires the implications of development affecting the setting of heritage assets to be considered on a case-by-case basis.

ASSESSMENT OF DEVELOPMENT PROPOSALS

The submissions are supported by an Environmental Impact Assessment - Scoping Report accompanied by Volume A: Figures (including indicative site plans), and Volume B: Appendices. Section 6 of the cited Scoping Report relates to Archaeology and Cultural Heritage. This references national and local policy, good practice guidance and outlines the intended approach in respect to the assessment of the proposed development and its potential impacts on the setting and significance of heritage assets. Whilst welcoming the intended methodology as outlined in the Scoping Report and associated documents, it is considered that in respect to listed buildings and Conservation Areas not all should be scoped out. The proposed 'project site' is illustrated in the Figures within Volume A. The project site traverses the boundaries of North Yorkshire and County Durham administrative areas. Figure 2.2 shows the tentative position of the proposed turbines (23 in total) with 14 situated within North Yorkshire Council (NYC) area. It is also noted that the proposed access and haul route seeks to use Barningham Road, through Newsham village and transversing the Newsham Pasture bounded by Moor Lane – all within North Yorkshire County. From a review of the submissions and consultation with the County's Historic Environment Record, it is noted that the proposed 'project site' does not contain any listed buildings neither is it situated within or straddles a Conservation Area. However, the site is located within proximity to several designated heritage assets whose setting and significance has the potential to be impacted. In respect to Archaeology and Cultural Heritage, Volume B: Appendices (Section 6 A & B) lists the Recorded Heritage Assets within the Site Boundary and provides a Heritage Appraisal Table. Collectively these identify all known heritage assets (designated and non-designated) within and outside the project site, providing a high level assessment of potential impact. However, it is noted that the submissions seek to scope out the majority of built heritage assets, in particular listed buildings and Conservation Areas which we consider need to be included within any Cultural Heritage Assessment for the scheme. It is therefore recommended that the following Conservation Areas and listed buildings are included in any forthcoming Cultural Heritage Assessment:

- Newsham Conservation Area - lies on the 5km ZTV boundary with the access and haul route proposed to go through the village. It is therefore considered the scheme has the potential to disturb and impact the significance of the asset particularly during the construction phase of the development.
- Grade II Listed Buildings – NHLE 1166422 Foxgrove, NHLE 1131298 Earby Hall, and NHLE 1301370 Hill Top lie within or in proximity to the 5km ZTV which includes the proposed development site and the proposed access corridor. It is therefore considered that the development proposals have the potential to impact the setting and significance of the identified listed buildings.

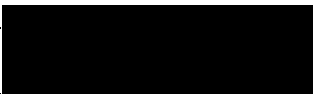
Recommendation:

It is therefore recommended that the formal Cultural Heritage Assessment includes the designated heritage assets as identified above.

In undertaking the Cultural Heritage Assessment, it is imperative that the proposed development is illustrated in context with the heritage assets incorporating views and prospects from, to and through the site, to determine the intervisibility between the heritage assets and the proposed development and the degree of impact on the setting of the heritage assets. The application should also include section drawings through the site illustrating the proposed development and its relationship with the heritage assets (where necessary). This is of consideration in this instance given the size and scale of the development proposals. The Cultural Heritage Chapter should contain a comprehensive assessment of the implications of the development proposals on the heritage assets and their setting (in accordance with

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990; and NPPF, Chapter 16. The Assessment should also include recommendations and mitigation measures which seek to ameliorate and lessen negative impacts on the designated heritage assets providing alternatives where necessary.

Ecology Comments

From:	 Principal Ecologist
To:	 Principal Planning Officer (Harrogate Office)
Date:	18/06/2026
Application Ref:	ZD26/00360/EIASCR
Site:	Hope Moor Wind Farm NSIP
Proposal:	An onshore wind farm with approximately 23 turbines, each up to 200m in height (to blade tip), with a generating capacity in excess of 100MW. The project also includes internal access tracks, an onsite substation, and highways works to the existing road network to facilitate access.
Ecology Recommendation:	The Ecology Team recommends that the comments contained within the comments section below are forwarded to the Secretary of State as North Yorkshire Council's official views regarding the ecological aspects of the EIA Scoping Report prepared by Fred. Olsen Renewables Ltd (May 2026)
Documents reviewed:	• https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110038-000002-Scoping%20Report.pdf EIA Scoping Report Fred. Olsen Renewables Ltd, May 2026 • https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110038-000003-Scoping%20Report%20Volume%20A%20-%20Figures.pdf EIA Scoping Report Figures, Fred. Olsen Renewables Ltd, May 2026 • https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN0110038-000004-Scoping%20Report%20Volume%20B%20-%20Appendices.pdf EIA Scoping Report Appendices, Fred. Olsen Renewables Ltd, May 2026
Background/Context:	The proposal is being considered by the Secretary of State as a nationally Significant Infrastructure Project (NSIP) and is at the pre-application stage of the NSIP process. An application is expected to be submitted in June 2027. North Yorkshire Council is being consulted on a Scoping Report as part of an Environmental Impact Assessment (EIA) which will consider the environmental effects of the proposed development.
Ecologist's Comments:	Designated Sites – European Sites – The North Pennine Moors Special Area of Conservation (SAC) and Special Protection Area (SPA) are both proposed to be scoped into the EIA. It is proposed to prepare shadow Habitats Regulations Assessments to assist the Planning Inspectorate which would be the competent authority with respect to the Habitats Regulations. The Ecology Team would like to see drafts when these become available so that we may comment. Local Wildlife Sites (LWSs) - The applicants propose to screen out of further consideration in the EIA all Local Wildlife Sites (LWSs) that are over 200 metres from the application site. We assume that this means that all LWSs that are less than 200 metres from the site would be screened in, but LWSs are not mentioned in Table 7 – 6 (the list of ecological receptors scoped in). No explanation for the 200 metre distance appears to be given and this seems a rather arbitrary distance to have chosen especially when it is acknowledged in the Report that aerial pollution needs to be considered in relation to the North Pennine Moors SAC which is a far greater distance than several LWSs. In North Yorkshire LWSs are designated as 'Sites of Importance for Nature

Conservation' (SINCs) and there are seven SINCs within 2 km of the application site including some where the features that have led to designation (e.g. semi-natural grassland habitats) are vulnerable to impacts from aerial pollution and from environmental changes affecting local streams. The Ecology Team would wish to see justification of the 200-metre 'zone of influence' for LWSs as well as the following SINCs scoped into the EIA: Easegill Grassland SINC (code NZ00-33); Locket Wood SINC (NZ00-24); Moresdale Beck Grassland SINC (NZ00-32) and Rispey Gill SINC (NZ00-18).

Habitats –

Peatland and Blanket Bog - One of the Ecology Team's biggest concerns regarding the proposal is the potential impact it could have on peat reserves and peatland. We welcome the commitment from the applicant that they will take active steps to avoid siting turbines on 'deep peat', but wonder how this sits with the statement that "extensive areas of deep peaty soils, > 2.0 m in depth, are present across the western and central extent of the Wind Farm Array" (paragraph 10.3.9). Table 10-2 that reports the results from a 'Phase 1 Peat Depth Survey' conducted on a 100m x 100m grid basis indicates that nearly half (48%) recorded a depth of peat 31cm or greater. Usually, if the depth of peat is under 30cm, the habitat would not be classified as Blanket Bog, but it is possible for thinner layers of peat to be found which are still functionally part of the Bog system or which could be habitat that is capable of being restored as Blanket Bog.

Blanket Bog (even in a degraded condition) is irreplaceable habitat as defined by the Environment Act 2021. As Natural England's Technical Information Note 219 makes clear, Upland Heathland can occur on degraded Blanket Bog – which means that there may be significant depths of peat beneath heathland habitat which may be deemed to be irreplaceable Blanket Bog as a result. One practical consequence of this observation is that a thorough high resolution peat depth survey is really essential in relation to this proposal because one cannot rely on the fact that Upland Heathland vegetation predominates to conclude that there is no significant depth of peat beneath the ground at this point. At the present time, the indicative locations for wind turbines mapped onto habitat data (as in Figures 7.4.1 to 7.4.7 inclusive) show not only instances where turbines are situated amidst Blanket Bog (such as 'T12') but also locations in areas characterised as Upland Heathland (e.g. 'T23') that are close to Blanket Bog and may actually be this habitat (for the reason given above). Similar considerations may apply to areas mapped as Upland Acid Grassland in the NVC mapping.

Species –

Brown Trout – This species is scoped in according to Table 7-6 in relation to cumulative impacts, but not, apparently to be considered otherwise. NYC recognises the importance of small upland streams as hatcheries for a variety of fish species and wishes that Brown Trout (as a representative sensitive species) be considered more widely in the EIA.

Reptiles and amphibians – The data supplied by North and East Yorkshire Ecological Data Centre includes a significant number of 2009 records from Holgate Moor of reptiles (Common Lizard, Slow-worm) and amphibians (Common Frog, Common Toad and Palmate Newt). However, it is proposed that reptiles and amphibians be scoped out of consideration on the basis that if measures outlined in Table 7-5 are undertaken there is unlikely to be an impact. The Ecology Team would rather it was established through survey what is the extent of any populations that might be present so that the impact of the proposals (in terms of habitat loss and fragmentation) can be assessed in the light of up to date information. We note that the SINC criteria in operation at the moment indicate that a SINC may be designated if as few as two reptile species can be shown to regularly use it.

Nightjar – Breeding territories have been recorded within The Stang woodland, which is outside of North Yorkshire, but which is partially included within the application site. The Ecology Team notes that Nightjar is proposed to be scoped out of the EIA despite turbine locations proposed on the edge of the plantation (T7 and T8) and one close by (T11). We would defer to Durham County Council ecologists on this matter but query the proposal to exclude this species from further consideration.

Barn Owl – In section 8.3.46 it is indicated that evidence has been found of breeding/roosting within the application site by this Schedule 1 protected species. It is proposed to exclude this

species from the EIA on the basis that it displays low sensitivity to displacement or collision mortality at wind farms. Since the Ecology Team is unclear what evidence has been found of Barn Owl presence we would ask that it be kept in the EIA at present and we would point out that there are other potential impacts of the development (e.g. the haul road and infrastructure away from the moorland) that could have a detrimental impact depending on where the roost site is located and foraging resources for the species in the area.

Further surveys/information to support the EIA -

In various places in Chapters 7 & 8 the following additional information is promised as part of the application for development consent:

- River Condition Assessment (survey to take place in 2026);
- Bat Activity Survey (2026);
- Updated walkover survey to confirm baseline data remains valid for the purpose of EIA (2026);
- Bird Surveys as set out in Table 8.8 of the report (2026);
- Shadow HRA;
- Outline Construction Environmental Management Plan (CEMP) that will contain a Biosecurity and INNS Management Plan (BIMP) and a Bird Disturbance Management Plan (BDMP);
- Outline Landscape and Ecology Management Plan (LEMP);
- Outline Operational Phase Environmental Management Plan (OPEMP);
- Outline Peat Management Plan (PMP);
- Peatland Condition Assessment; and
- Peat Landslide Hazard and Risk Assessment.

The Ecology Team considers all of the above to be pertinent and relevant to the Ecological Impact Assessment aspects of the EIA and would wish to be given the opportunity to contribute and comment on these. In addition (as set out above) we would like to see a reptile and amphibian survey at least of Holgate Moor. We would like to be provided with a complete list of the ecological surveys undertaken to date in relation to this proposal and to have sight of these. This may prompt further comments concerning the adequacy of work undertaken so far.

We note that the Scoping Report contains statements (at 7.4.18 and 8.4.32) to the effect that the applicants wish to consult North Yorkshire Council on Ecology and Ornithology. NYC's Ecology Team welcomes this and looks forward to hearing from Fred. Olsen Renewables in due course. We confirm there has been no consultation with us to date.

Environmental Health Comments

 Scientific Team Environmental Health Regulatory Services	
Planning Consultation Contaminated Land / Air Quality Reference: CX 189259	

Planning Application and Description:	Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11 Proposed application by Fred. Olsen Renewables Ltd (the applicant) for an Order granting Development Consent for the Hope Moor Wind Farm (the proposed development) Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested. The proposed development is a Nationally Significant Infrastructure Project (NSIP), as defined in the Planning Act 2008 (as amended). A summary of the NSIP planning process can be found at the following link:
Site Name and Address:	Hope Moor Wind Farm, The Project is situated on an area of open moorland ('the Site') to the south of Barnard Castle and north of Richmond, between the A66 and A6108 roads, covering approximately 1,111 hectares (ha) and centred on National Grid Reference (NGR) NZ 04847 06480. T
Title of report(s) reviewed:	- Environmental Impact Assessment Scoping Report – EN0110038 Final Report 28 May 2026. Volume A and Main text. - Rampion 2 Wind Farm Category 6: Environmental Statement Volume 2, Chapter 5: Approach to the EIA (clean) Date: August 2024 Revision B - Ecodoc number: 004866027-02

CLR - Contaminated Land Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property, and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours, and other offsite receptors.

AQR - Air Quality Reason:

To ensure that, where relevant and proportionate to the development proposed, the scheme does not result in unacceptable impacts on local air quality and human health.

Thank you for consulting the Scientific Team on the Scoping Opinion in connection with the proposed Nationally Significant Infrastructure Project (NSIP) - Hope Moor Wind Farm. The available documentation referenced above has been reviewed, and from a **contaminated land and air quality perspective** I provide the following comments:

Contaminated Land

The Scoping Report confirms that no land within the study area has been formally determined as contaminated under Part 2A of the Environmental Protection Act 1990, based on the search information provided by North Yorkshire Council. However, a number of potential risk sources have been identified, including:

- Disturbance of Historic mining activities/seams (31 recorded entries)
- Localised metals contamination associated with historic lead working, hushing and remaining contaminated spoil heaps, which has the potential to mobilise contaminants into soils and groundwater
- Deep peatland environments
- Ground stability risks (including potential sinkholes and dissolution features)
- Historic quarrying activity within the search area.

The Scoping Report appropriately identifies the need to assess potential risks to human health, the wider environment, soil and peat disturbance during construction,

and geotechnical constraints influencing design; *The potential for flooding, including the mobilisation of contaminants associated with disturbed soils and historic mining materials, and the associated risks to controlled waters are not to be under played.* These are recognised as valid considerations; although the approach is currently framed primarily in terms of environmental protection and ground engineering, rather than explicitly within a contaminated land risk framework; these should not be treated as mutually exclusive.

It is therefore noted and welcomed that a **desk-based Phase 1 Geo-Environmental Site Assessment** incorporating a Preliminary Land Quality Risk Assessment (PLQRA) is proposed. This should be undertaken in accordance with the Environment Agency's Land Contamination Risk Management (LCRM) guidance and adopt a risk-based approach structured around the pollutant linkage model (source–pathway–receptor).

The assessment should:

- Identify and assess potential contaminant sources within the site footprint and any temporary construction areas
- Clearly establish potential pollutant linkages
- Consider risks to:
 - construction workers
 - controlled waters
 - off-site receptors, where relevant
- **Determine the need for any further intrusive investigation or remediation.**

The outputs of the assessment should be appropriately integrated with the Construction Environmental Management Plan (CEMP) and any peat management strategy.

The inclusion of investigations relating to **Private Water Supplies (PWS)** is supported, and appropriate design measures should be implemented to avoid any adverse impacts on these receptors.

Potential construction-phase impacts associated with soil and peat disturbance should be fully scoped into the Environmental Impact Assessment (EIA).

Air Quality

The proposed scope for air quality assessment is considered proportionate and appropriate. The focus is on:

- Construction phase dust emissions; and
- Construction traffic emissions, informed by Defra background data;

This is consistent with IAQM/EPUK guidance and reflects the likely risk profile of the development.

Operational air quality impacts have been scoped out, and this is considered acceptable given the nature of the proposals. Whilst there are residential receptors within 2 km of the site, these are limited in number and sensitivity, and significant operational impacts are not anticipated.

The approach aligns with a proportionate, risk-based assessment, and it is expected that standard mitigation measures, including those secured through a Construction Environmental Management Plan (CEMP), will be sufficient to control potential air quality impacts/effects during the construction phase.

Further detailed comments on construction management and nuisance control may be provided by my Environmental Protection colleagues.

Consultation Date:	15 th June 2026
Consultation undertaken by:	Scientific Officer
Contact details:	



**Environmental Protection
Environmental Health
Regulatory Services**

Planning Consultation Environmental Health: CX 189262

Planning Application and Description:	Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11 Proposed application by Fred. Olsen Renewables Ltd (the applicant) for an Order granting Development Consent for the Hope Moor Wind Farm (the proposed development) Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested. The proposed development is a Nationally Significant Infrastructure Project (NSIP), as defined in the Planning Act 2008 (as amended). A summary of the NSIP planning process can be found at the following link:
Site Name and Address:	Hope Moor Wind Farm, The Project is situated on an area of open moorland ('the Site') to the south of Barnard Castle and north of Richmond, between the A66 and A6108 roads, covering approximately 1,111 hectares (ha) and centred on National Grid Reference (NGR) NZ 04847 06480. T
Title of report(s) reviewed:	Environmental Impact Assessment Scoping Report – EN0110038 Final Report 28 May 2026.

Environmental Protection Response:

Environmental Protection notes the EIA scoping report identifies the potential for likely significant effects arising from the construction, operational/management and decommissioning phases of the development, both alone and cumulatively, in relation to noise and vibration. The proposed scope of assessment is considered acceptable.

Scoping In: Noise and vibration

Impacts proposed to be scoped into the assessment for noise and vibration include construction activities, including construction vehicle movements, potential effects due to noise from wind turbines, potential effects due to noise from ancillary electrical infrastructure and potential cumulative effects due to noise from existing or proposed wind turbines within 10 km of the project.

Scoping Out: Noise and vibration

Impacts proposed to be scoped out of the noise and vibration assessment include operational road traffic noise, operational vibration, infrasound, low-frequency noise, tonal noise and excess amplitude modulation (AM).

Current national policy and guidance for wind turbine noise assessment indicate that specific assessments of infrasound, low-frequency noise and excess AM are not generally required at the planning stage for proposed onshore wind energy developments. These effects fall outside the scope of ETSU-R-97 and the Institute of Acoustics Good Practice Guide (IoA GPG) methodology. Consequently, detailed

assessments of these matters, and the application of pre-emptive planning conditions relating to excess AM, are typically scoped out of the Noise Impact Assessment. Instead, appropriate control is achieved through compliance with ETSU-R-97 noise limits and site-specific operational noise conditions attached to any planning permission.

Environmental Protection agrees that these matters need not be considered within the assessment of operational noise impacts.

Proposed methodology

The proposed assessment methodology is generally considered appropriate. The use of BS 5228:2009+A1:2014 Parts 1 and 2 for the assessment of construction noise and vibration is supported. The assessment should identify all noise-sensitive receptors, evaluate the significance of effects, and set out appropriate mitigation measures, including any commitments to working hours, plant selection, traffic routing and construction management measures.

The assessment of operational wind turbine noise in accordance with ETSU-R-97 and the Institute of Acoustics Good Practice Guide is welcomed. Baseline noise monitoring locations and methodologies should be clearly justified and representative of the nearest and most affected noise-sensitive receptors.

The proposed assessment of operational noise from ancillary electrical infrastructure in accordance with BS 4142:2014+A1:2019 is supported. The assessment should consider all fixed plant and associated equipment and include details of any acoustic mitigation required to achieve acceptable noise levels at nearby receptors.

Environmental Protection also supports the proposed cumulative noise assessment and welcomes the assessment of cumulative operational wind turbine noise from existing, consented and proposed wind energy developments in accordance with ETSU-R-97 and the Institute of Acoustics Good Practice Guide.

Dust: Construction Management

Environmental Protection welcomes the proposed outline Construction Environmental Management Plan (CEMP) including a separate outline Dust Management Plan (DMP) and outline Materials Management Plan (MMP).

The proposed approach to the Construction Phase Dust Assessment is noted and is broadly consistent with the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust from Demolition and Construction. The assessment methodology identifies relevant human and ecological receptors within the applicable study areas and proposes a risk-based assessment of dust-generating construction activities.

The proposed inclusion of mitigation measures within an Outline Construction Environmental Management Plan (CEMP) is welcomed. The CEMP should include, as a minimum:

- Measures to suppress and control dust generation and track-out from construction traffic.
- Appropriate management of stockpiles and exposed surfaces.
- Procedures for monitoring and responding to dust complaints.
- Identification of responsible personnel and site management procedures.
- Arrangements for reviewing and adapting mitigation measures should dust impacts arise during construction.

Subject to the submission of a robust assessment and the implementation of proportionate mitigation measures through a suitably conditioned CEMP, it is anticipated that construction dust effects can be adequately controlled and reduced to an acceptable level. Therefore, the scope of the proposed Construction Phase Dust Assessment is considered acceptable.

Further detailed comment on air quality may be provided by colleagues from the scientific team.

Consultation Date: 19 June 2026

Consultation undertaken by:

Contact details:

Economic Development Comments

Application Details

Reference Number:

ZD26/00360/EIASCR

Applicant:

Fred. Olsen Renewables Ltd

Site Location:

Open moorland south of Barnard Castle and north of Richmond, between the A66 and A6108, crossing North Yorkshire Council and Durham County Council administrative areas.

Proposal Description:

Construction and operation of Hope Moor Wind Farm, comprising up to 23 wind turbines (up to 200 m tip height) and associated infrastructure, with a generating capacity of at least 100 MW.

1. Proposal Summary

The proposal relates to a large-scale onshore wind farm development (Hope Moor Wind Farm), comprising up to 23 turbines with a maximum height of 200 m and an anticipated generating capacity exceeding 100 MW.

The project has been identified as a **Nationally Significant Infrastructure Project (NSIP)** and will be progressed via the Development Consent Order (DCO) process.

The development includes associated infrastructure such as access tracks, substations, compounds, cabling and borrow pits, alongside environmental mitigation and enhancement measures. Construction is anticipated to take approximately 18 months, with an operational life of up to 30 years.

2. Site and Context

The site covers approximately 1,111 hectares of upland moorland, located between the A66 and A6108, approximately 11 km north-west of Richmond and 9 km south of Barnard Castle.

- **Land use:** Predominantly open moorland used for grouse shooting and livestock grazing.
- **Agricultural classification:** Mainly Grade 5 land (very poor), with some Grade 4 and limited Grade 3.
- **Environmental context:** The site lies adjacent to, but outside, nationally designated landscapes including the Yorkshire Dales National Park and North Pennines National Landscape.
- **Infrastructure and access:** Proximity to the A66, A67, A684 and A1(M) provides strategic connectivity; local access routes include Moor Lane and Barningham Road.
- **Constraints:** Presence of peatland, watercourses, historic mining activity and heritage assets (including a Scheduled Monument).

The surrounding area is rural in character with low population density and dispersed settlements.

3. Economic, operational, socio-economic and tourism considerations:

- **Scale of investment:**

The scheme represents a significant private sector investment in renewable energy infrastructure, with an installed capacity anticipated at up to c.165 MW.

- **Energy generation:**

Estimated annual output of approximately 454 GWh, sufficient to power around 136,640 UK homes.

- **Employment:**

Construction phase: Temporary employment opportunities in construction, engineering and project delivery.

Operational phase: Limited long-term roles for maintenance, monitoring and site management.

- **Supply chain opportunities:**

Potential for regional and local businesses to engage in construction, transport, materials supply, environmental consultancy and maintenance services. Use of on-site borrow pits may reduce import demand for aggregates.

Transport and logistics:

Construction will involve significant vehicle movements, including abnormal loads for turbine components, with reliance on the strategic road network and local rural roads.

- **Community benefit:**

The applicant has indicated a community benefit fund of £5,000 per MW installed capacity, potentially generating substantial investment into local communities over the operational lifetime of the scheme.

Socio-Economic Impacts:

The proposal represents a significant private sector investment in renewable energy infrastructure. It is expected to generate temporary employment during the construction phase, particularly in construction, engineering and project delivery roles, with limited long-term operational employment associated with maintenance and site management.

The development presents opportunities for local and regional supply chain engagement across construction, transport, materials and specialist services. A community benefit fund linked to installed capacity could provide a long-term financial contribution to local communities.

However, potential impacts on the rural economy should be considered, including disruption to existing land uses such as grazing and grouse moor management. Overall, while the scheme is likely to generate economic value and investment, long-term employment benefits are expected to be modest and dependent on local supply chain participation and skills alignment.

Tourism and Visitor Economy Impacts

The site is located within a wider upland landscape that supports tourism and recreational activity, including walking routes and outdoor experiences.

The primary tourism consideration relates to potential landscape and visual impacts, which may affect the character and perception of the area and the quality of visitor experience. Construction activity may also result in temporary disruption through increased traffic and reduced accessibility.

At this stage, detailed tourism impacts have not been quantified and will be assessed further in the Environmental Statement, particularly in relation to landscape and visual effects.

Alignment with the Destination Management Plan

The proposal aligns with aspects of the Destination Management Plan in supporting economic growth, investment and sustainability objectives, particularly through its contribution to renewable energy and low-carbon development.

However, the Plan highlights that North Yorkshire's visitor economy is underpinned by high-quality landscapes, tranquillity and outdoor experiences. As such, there is potential tension where landscape and visual impacts could affect these assets.

4. Key Considerations / Risks

- **Rural economy impacts:**

The site currently supports grazing and grouse moor management. Changes to land use and access may affect existing rural economic activity.

- **Tourism and visitor economy:**

The site is located within a wider landscape that supports tourism and recreation (including walking routes such as the Pennine Way and Teesdale Way). Potential impacts on landscape character and visitor experience are identified for assessment within the EIA.

- **Transport impacts:**

Construction traffic, including abnormal loads, may affect the local highway network and require mitigation through a Construction Traffic Management Plan.

- **Grid connection uncertainty:**

The location and route of grid connection infrastructure are not yet confirmed and are not currently included within the DCO application, which may result in future additional development and impacts.

- **Cumulative effects:**

The project will be assessed alongside other infrastructure and energy developments in the area (including A66 upgrades and other wind farms), which may result in cumulative economic and environmental effects.

Local labour and skills:

Specialist skills requirements may limit the extent of local employment benefits unless aligned with training and supply chain engagement initiatives.

5. Benefits and Policy Alignment

- **Net zero and clean energy:**

The project directly contributes to national and regional objectives for decarbonisation, renewable energy generation and energy security.

Economic growth and investment:

Aligns with the North Yorkshire Economic Growth Strategy and YNYCA Investment Strategy by attracting significant private investment and supporting infrastructure development.

- **YNYCA Investment Strategy alignment:**

The proposal is consistent with key principles including:

- Delivery of regionally significant investment
- Contribution to carbon reduction ambitions
- Potential to generate employment and economic value

- **Inclusive growth and opportunity:**

Contributes to priorities to increase employment, improve business performance and support sustainable economic outcomes across the region.

Visitor economy considerations:

The Destination Management Plan highlights the importance of balancing economic growth with protection of landscape and visitor experience, particularly relevant given the site's proximity to national landscapes.

Community benefit:

The proposed community fund offers potential for long-term local investment, subject to further engagement and governance arrangements.

Overall, the proposal represents a significant renewable energy investment with clear alignment to national and regional economic and environmental priorities. At the EIA scoping stage, the key consideration for the Economic Development Team is ensuring that potential economic benefits are maximised locally, while impacts on the rural economy, infrastructure and visitor economy are appropriately assessed and mitigated.

Landscape Comments

From: [REDACTED] rincipal Landscape Architect

To: [REDACTED]@northyorks.gov.uk

Our Ref: ****

Date: 16 June 2026

Landscape Planning Consultation – EIA Screening Opinion

Application / Project Ref: ZD26/00360/EIASC

Refer to Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Schedule 2 – on or near a sensitive area? (thresholds don't apply)	Yes	X	No	
Schedule 2- not in a sensitive area but exceeds thresholds?	Yes		No	
Schedule 2 – -are the landscape and visual effects likely to be significant?	Yes	X	No	

The proposed development does meet the criteria for an EIA based on Landscape and Visual sensitivities meaning that there is a likelihood of adverse Landscape and Visual Effects. A Landscape and Visual Impact Assessment (LVIA) must be prepared to support

the planning application in accordance with Industry Best Practice as currently outlined in GLVIA (3rd Edition) 2013 and as updated and technical Guidance Notes produced by the Landscape Institute. The LVIA must be prepared by a suitably qualified and experienced Landscape Architect who is a Chartered member of the Landscape Institute. The Landscape consultant must seek approval of viewpoints as including photomontage selection and the scope of the LVIA prior to undertaking the assessment.

This review has appraised the relevant sections of Environmental Impact Assessment Scoping report: Main Text prepared by SLR Consulting Ltd and Scoping Report Volume A Figures and Scoping Report Volume B Appendices. All documents are dated May 2026.

COMMENTS: The development falls within schedule 2 of the EIA regulations. The site is partially located within the locally designated Area of High Landscape Value and approximately 0.7km from the closest boundary of the Yorkshire Dales National Park.

The site is located within the open moorland of Hope Moor (shown on figures 1.1, 1.2. and 2.2.) at a height of 503m above sea level, Stang Forest occupies the slopes to the north of the site forming a strong boundary.

Key transport corridors within the wider area include the A66 and A67 to the north, the A684 to the south, and the A1(M) to the east. Other roads tend to be rural in character. Recreational routes include the Teesdale Way, Pennine Way, NCN Route 71, and locally promoted trails such as the Barningham Trail. The site does have PROW's running through the eastern part as well as along the north and eastern boundaries.

The report states there are eight residential properties within 1.75km of the Scoping Boundary. The nearest villages and hamlets are Newsham (146 m) Barningham (883 m), Dalton (1.9 km), Scargill (2.4 km), Washfold (2.3 km), Helwith (2.4 km), Hurst (2.5 km), Gayles (3.3 km), Booze (3.5 km), Langthwaite (4.1 km), Arkle Town (4.3 km), and Whaw (4.8 km).

The assessment of potential Landscape and Visual matters and evolving proposals relating to the Hope Moor Wind Farm, as a Nationally Significant Infrastructure Project (NSIP), shall follow an iterative process of engagement and consultation to ensure the following are not fixed at this stage and are discussed, developed, and agreed at subsequent technical meetings:

- Landscape and Visual Impact Assessment (LVIA) Methodology.
- ZTV parameters.
- Study Area extents (distance).
- Viewpoint quantity and locations.
- Mitigation Measures/Landscape Scheme/Site Layout.
- Photomontage/Accurate Visual Representations (AVRs):

Quantity and location.

Phase depiction.

AVR Type and Level.

We would expect the production of the Landscape and Visual chapter of the Environmental Statement (ES), which would be in the form of a Landscape and Visual Impact Assessment (LVIA), and any supporting information (such as plans or figures) to reflect current best practice and guidance from, as a minimum, the following sources:

- 'Guidelines for Landscape and Visual Impact Assessment', (GLVIA3), April 2013 by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA);
- 'An Approach to Landscape Character Assessment', Natural England (2014);
- 'Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals', 17th September 2019 by the Landscape Institute (LI);
- 'Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)', 10th January 2020 by the Landscape Institute (LI); and
- 'Technical Guidance Note (TGN) 2/21 Assessing landscape value outside national designations', May 2021 by the Landscape Institute (LI).

At this initial stage of the NSIP process, the content and level of information provided by the developer within *Chapter 5* (Landscape and Visual), and *Figures 5.1 to 5.12* are generally

considered satisfactory, however, we would expect to discuss this content and approach as part of the iterative process.

Scope of the Study Area

Viewpoints

Field surveys and ZTV's have been used to determine a study area of 45km. Following a desk-based assessment, the 45km extent to the study area appears to be acceptable. Figures 5.2 to 5.6 and table 5.3 of the scoping report identifies 18 proposed viewpoints across the study area. The locations of current 18 appear to be appropriate for closer scrutiny of sensitivity, however the final locations are to be agreed with NYC and other relevant stakeholders. Having undertaken a desk-based assessment and studied the ZTV's, alongside the study area characteristics, we suggest that these viewpoints need to be supplemented by additional ones at further distances to the east and southeast. The viewpoints currently identified underrepresent locations east towards the A1M beyond 20km.

Photomontages

To gain an understanding of the visibility of the development and how the turbines and infrastructure would appear in the surrounding landscape, Photomontages/Accurate Visual Representations (AVRs) should be produced. It is currently proposed to develop viewpoints within 20kms as photomontages; however, it is not clear the justification for the selection of distance as an arbitrary extent for photomontage production. Given this criterion there are currently no proposed photomontages to the east or southeast of the site despite the ZTV suggesting theoretical visibility.

The number and location of the agreed viewpoints to be developed as Photomontages/AVRs should be agreed with NYC and other relevant stakeholders and produced in accordance with TGN 06/19 Visual Representation of Development Proposals. At this stage, it is deemed appropriate that these should be produced to illustrate the proposals at different phases: Existing Situation (baseline), Operational (year 1) and Residual (10 to 15 years). The Photomontage/AVR Level and Type is to be discussed and agreed.

The visual assessment should include for visual receptors, and not just an assessment of any agreed viewpoints. It should also clearly cross reference viewpoints to associated receptors.

Methodology

Chapter 5, section 5.4 of the Scoping Report considers landscape and visual matters in detail, it is supplemented by figures 5.1 to 5.12, (Scoping Report Volume A: figures). This section provides a description of the assessment criteria and methodologies; these are derived from best practice guidance documents and will accord with 'Guidelines for Landscape and Visual Impact Assessment: Third Edition' ('GLVIA3').

The section explains the topic specific divergence from the broader methodology considered in chapter 3. At this stage there has been no consultation regarding methodology for the LVIA. The approach for consultation with statutory consultees is detailed in section 5.4.14. This will include the viewpoint selection, photography, approach to assessment and the cumulative assessment. Our comments on the scoping report will form part of the consultation process.

A study area of 45km has been determined by a combination of desk based and site survey work. Given the size and number of turbines alongside the baseline characteristics, the study area is consistent with best practice, and this is supported by the ZTV diagrams (Figures 5.2 to 5.9).

The LVIA shall determine the likely significant effects that the Project would have on the landscape and visual resource. Paragraph 5.4.6 confirms the degree of effect while paragraph 5.4.7 clarifies that moderate effects could be both considered as significant or not significant, depending on the sensitivity and magnitude of change factors evaluated. We accept that matrices should be used as a guide to aid professional judgement, however the assessment methodology needs to be consistent and clearly explained with a reasoned justification and transparent assessment that considers all contextual matters such as landscape character, receptors and experience.

Assessment of effects

Within the scoping report the potential effects on the landscape and visual resource are grouped into the following categories:

Physical effects: these are restricted to the area within the Site and consider the direct effects on the existing fabric of the site.

Effects on landscape character: this is defined as the distinct and recognisable pattern of elements that occurs consistently in a particular type of landscape and the way that this pattern is perceived. Identifiable effects would arise from the introduction of new elements which would alter

the pattern or through visibility of the Project altering the way in which the pattern of elements is perceived.

Landscape character receptors, which fall into two groups - landscape character types and landscape / seascape-related designated areas. Effects on National Scenic Areas will be considered against their special landscape qualities.

Effects on views: the assessment of the effects on views is defined as an assessment of how the introduction of the Project would affect views throughout the LVIA Study Area. The scoping report has identified 18 initial viewpoints within the study area, the majority of which are located within 10km of the site. Section 5.6 details the ZTV's prepared for the scoping report. Whilst theoretical visibility to the east/ southeast up to 45km is shown on the ZTV, the report suggests that intervening landform and vegetation coverage diminishes visibility beyond 20km. North Yorkshire Council would seek consultation on the location of the viewpoints as the Project progresses given that at present the number of viewpoints to the east and southeast is limited.

Cumulative effects are determined as where two or more developments (windfarms or in some cases other relevant development) overlap so that both developments are experienced at a proximity where they may have a greater incremental effect, or where they may combine to have a sequential effect.

Policy, Legislation and Relevant Guidance is considered in section 5.4.10 and we agree that this shall be an adaptive list as the design evolves.

The provision for future baseline data assessment is detailed from section 5.4.11, this includes further desk based and site-based assessment to inform the LVIA and the evolving site design.

Landscape Character

The site sits within three National Character Areas (NCAs) as detailed in paragraph 5.6.8. It is stated, due to geographical constraints, that theoretical visibility of the project shall be greatly reduced beyond 10km to the south and 20km to the north and west. To the east, theoretical visibility is expected to diminish beyond 20km within the lower lying Tees Valley NCA given the layering of vegetation. Whilst we consider this to be a valid assumption, we would wish to see additional viewpoints to the east and southeast to confirm the desk-based assessment work.

The site is located within LCA 33 Gritstone High Plateau which is characterised by a flat upland plateau comprising blanket peat with an expansive undeveloped character resulting in a strong sense of tranquillity and remoteness. Multiple viewpoints are located within the LCA predominantly within 10km of the scoping boundary, where theoretical visibility is greatest. Given the potential for visibility beyond 10km within the LCA we would seek to consult on the final selection of viewpoints. To align with GLVIA3 the LVIA should include an assessment of landscape effects at a range of scales and include a finer grain landscape assessment that includes the Site and immediate area and that also considers individual landscape elements such as trees and hedgerows, woodlands, ponds/water features, or historic landscape features.

Landscape Designations

National landscape planning designations are located within the study area, the project site does not lie within any national designations. The closest designation is the Yorkshire Dales National Park.

The northern section of the site is located within an area of Higher Landscape Value, which is land recognized for its distinctive, high-quality landscape features, warranting conservation and careful management. There are several viewpoints located within the designation to enable a robust assessment

Table 5.2 presents a preliminary assessment of landscape designations providing dialogue to justify the inclusion or omission from detailed assessment within the forthcoming LVIA. We are generally in agreement with the findings of the table given the design parameters at scoping stage presenting the worst-case scenario threshold. We would seek to remain in consultation over this matter as the design evolves.

Visual receptors and visual amenity

Table 5.3 lists the preliminary viewpoints; as stated, we do consider the merit in including additional viewpoints particularly to the east and south-east. We would seek to continue consultation on the micro siting of the selected viewpoints particularly those within 20km which will include photomontages.

Cumulative effects

Cumulative impacts for consented and proposed windfarms will be considered alongside other forms of major development. Given the proximity of major roads such as A66 and A1/M there is potential for sequential effects. The assessment will include wind turbine developments with a height above 50m and non-wind national infrastructure projects within 45km from the project.

The closest existing windfarm is 30km from the project. There are 1 consented development and 2 applications within the study area which will be assessed.

We consider the approach to assessing cumulative effects is satisfactory at this stage but would seek continued dialogue on this matter.

Mitigation and Layout

As this is an iterative process, at this stage no mitigation measures have been considered in detail. The areas identified as locations for the turbines and associated infrastructure are broad and certain aspects of the design remain to be finalised. Likewise, the area identified as potential haul route is of significant size. The impact on receptors should be used to inform the design of the proposals. The mitigation should reflect the open character of the study area.

CONCLUSION

In response to the screening questions 11.1. The site is near to a sensitive area as defined by the EIA regulations with the Yorkshire Dales National Park with the nearest boundary lying approximately 0.7km south of the site. Part of the site is located within a locally designated landscape area where there are likely to be some landscape and visual effects of the proposed within the setting of this landscape.

With reference to question 11.2 Yes, the site is likely to be seen by large groups of people given the scale of the development, and the proximity of the A66 and other principal routes. There is likely to be some containment to the north from Stang Forest, but the scale of the turbines will result in long range views from the A66 route particularly the eastbound carriageway.

On balance I think that the size of the development and the likely impacts on Landscape and visual receptors warrants an EIA for Landscape and Visual impacts.

POLICY:

EIA 2017 Regulations:

<http://www.legislation.gov.uk/ukxi/2017/571/introduction/made>

<http://www.legislation.gov.uk/ukxi/2017/571/schedule/1/made>

<http://www.legislation.gov.uk/ukxi/2017/571/schedule/2/made>

<http://www.legislation.gov.uk/ukxi/2017/571/schedule/3/made>

Sensitive areas as defined by EIA legislation:

All developments in, or partly in, such areas should be screened. These are:

- Sites of Special Scientific Interest and European sites;
- National Parks, the Broads and Areas of Outstanding Natural Beauty; and
- World Heritage Sites and scheduled monuments.

Further information can be found in the following link:

Environmental Impact Assessment - GOV.UK (www.gov.uk)

EIA Screening Matrix 2017 Regulations Nov 2021

EIA Screening Matrix Questions 11.1 and 11.2 refer to Landscape and Visual Effects and ask LPA's to consider the response and the likelihood of a significant effect.

A Screening Criteria Question

B Response to the Screening Criteria Question in Column A (Yes/No and explanation of reasons)

C Is a Significant Effect Likely? (Yes/No and explanation of reasons (nb if the answer in Column B is 'No', Column C is not applicable))

11. LANDSCAPE AND VISUAL

11.1 Are there any areas or features on or around the location which are protected for their landscape and scenic value, and/or any non-designated / non-classified areas or features of high landscape or scenic value on or around the location which could be affected by the project? 1 Where designated indicate level of designation (international, national, regional or local).

11.2 Is the project in a location where it is likely to be highly visible to many people? (If so, from where, what direction, and what distance?)

<https://www.gov.uk/government/publications/environmental-impact-assessment-screening-checklist>

NPPF

Local Landscape Designations

Local Plan Policies

Richmondshire Local Plan 2012-2028

Core Policy CP2: Responding to Climate Change

Planning Guidance

Lead Local Flood Authority Comments

Application No: LLFA/ZD26/00360/EIASCR

Proposed Development:

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

Location: Hope Moor Onshore Windfarm

Applicant:

District/Borough: North Yorkshire Council [Richmondshire]

FRM Engineer [REDACTED]

LPA Case Officer [REDACTED]

Note to the Planning Officer:

Thank you for consulting the Lead Local Flood Authority on the planning application referenced above. Initially, the LLFA encourage the applicant to review the NYC SuDS Guidance, as this outlines what is required for each type of planning application and what the LLFA expectations are for design requirements. The SuDS guidance can be found here:

<https://www.northyorks.gov.uk/environment-and-neighbourhoods/flooding/flood-and-watermanagement/sustainable-drainage-systems-guidance-2022-update>

The following documents are noted:

- EIA Scoping Report, Fred Olsen Renewable, May 2026
- Environmental Impact Assessment, Scoping Report Figures 9.1, 9.2, 9.3, May 2026

In assessing the submitted proposals and reaching its recommendation the Authority would like to make the following comments:

It is noted that the EIA Scoping report has scoped Flood Risk in, we agree that Flood Risk is scoped in.

We consider that the following issues should be considered and addressed.

We strongly recommend that any EIA includes, or any planning application for development is accompanied by a flood risk assessment (FRA) / surface water drainage strategy to address

- all sources of flood risk, including those from ordinary watercourses, surface water and groundwater to the development
- how surface water drainage from the development will be managed on-site and show compliance with the written Ministerial Statement HCWS 161 by ensuring that Sustainable Drainage Systems (SuDS) are put in place
- how any phasing of the development will affect the overall drainage strategy and what arrangements, temporary or otherwise, will need to be in place at each stage of the development in order to ensure the satisfactory performance of the overall surface water drainage system for the entirety of the development.

This supporting information would assess the potential for the development to increase the risk of flooding from the proposal or how surface water runoff through the addition of hard surfaces will be managed. It will show how this will be managed to ensure that the development does not increase flood risk on the site or elsewhere, in line with National Planning Policy Framework.

Site specific appropriate information required for EiA or Planning application;
Wind farm developments are generally considered to present a relatively low flood risk due to the largely permeable nature of the land use. However, the introduction of infrastructure such as turbine bases, crane pads, access tracks, substations, and ancillary buildings can alter natural drainage patterns and increase runoff locally.

Therefore we would still expect to see appropriate surface water mitigation measures in place. Wind farm applications will require a drainage strategy and a land management strategy. These should demonstrate how surface water runoff will be managed sustainably throughout the construction, operational, and decommissioning phases

The LLFA expects applicants to:

- Clearly quantify impermeable areas within the drainage strategy
- Demonstrate that greenfield runoff rates will be maintained or improved
- Consider the cumulative hydrological effect of dispersed hardstanding elements
- A construction Management Plan to indicate how surface water flows will be managed during construction.
- Drainage strategy should also contain a maintenance and management plan detailing the activities required and details of who will adopt and maintain all the surface water drainage features for the lifetime of the development.

To mitigate this the following should be considered:

Key Surface Water Management Principles

The following best practice measures are expected to be incorporated into the design and management of wind farm developments:

Access Tracks and Infrastructure

- Vehicle movements should be restricted to defined access tracks
- Tracks should be constructed using permeable materials where feasible
- It should be assumed that tracks will become compacted and act as impermeable surfaces over time
- All hardstanding areas (tracks, turbine bases, crane pads, substations) must be included in runoff calculations
- Appropriate SuDS features should be provided to mitigate runoff from these areas

Management of Surface Water Flow Paths

- Changes in topography and infrastructure can concentrate or redirect flows, leading to:
 - o Channelisation
 - o Erosion
 - o Increased flow velocities

To mitigate this, the drainage strategy should include:

- Swales and filter strips alongside access tracks
- Check dams within swales to slow flow and encourage infiltration
- Cross-drainage (e.g. culverts or water bars) to maintain natural flow paths
- Energy dissipation measures at discharge points where necessary

Vegetation and Land Management

- The site should be maintained as grassland or appropriate vegetative cover
- Vegetation should:
 - o Promote infiltration
 - o Reduce flow velocity
 - o Minimise soil erosion

Applicants must specify:

- The type of vegetation to be established
- Seeding strategies (if required post-construction)
- Long-term management and maintenance regime

Management approaches may include:

- Controlled grazing
- Periodic cutting
- Avoidance of bare or compacted ground

Soil Compaction and Construction Impacts

Construction activities pose a significant risk of:

- Soil compaction
- Rutting
- Reduced infiltration

Mitigation measures should include:

- Minimising vehicle movements outside defined tracks
- Use of low ground-pressure equipment where possible
- Post-construction soil remediation, such as:
 - o Subsoiling or chisel ploughing
- Restoration of ground to pre-development condition (or better)

Inspection, Monitoring, and Maintenance

- A monitoring programme should be implemented, particularly in the early years
- Regular inspections should assess:

- o Vegetation establishment
- o Soil condition (compaction, rutting)
- o Performance of SuDS features
- Any defects or degradation should be remedied promptly

Sustainable Drainage Systems (SuDS)

SuDS must be incorporated in line with the drainage hierarchy, prioritising:

1. Infiltration
2. Discharge to watercourse
3. Discharge to surface water sewer (if applicable)

Appropriate SuDS for wind farm developments include:

- Swales and vegetated channels
- Infiltration trenches
- Filter drains alongside tracks
- Attenuation basins or ponds (where required)

Attenuation Requirements for Hardstanding Areas

Formal attenuation will be required for impermeable elements, including:

- Turbine bases and crane pads
- Substations and compounds
- Control buildings
- Access roads and hardstanding areas

The drainage strategy must demonstrate:

- No increase in peak discharge rates (greenfield runoff rates achieved)
- Adequate storage for critical storm events (including climate change allowance)
- Safe exceedance flow routing

Although wind farm developments are predominantly permeable, the LLFA requires robust surface water management to:

- Prevent increased runoff rates
- Protect existing drainage pathways
- Maintain or enhance infiltration capacity
- Avoid downstream flood risk

A comprehensive, site-specific drainage strategy and land management plan must demonstrate that sustainable drainage principles are embedded throughout the design, construction, and operational life of the development.

We welcome that the applicant indicates that a Flood Risk Assessment (FRA) will be undertaken based on the requirements of the National Planning Policy Framework (NPPF).

Further guidance for developers can be found on our website at:

https://www.northyorks.gov.uk/environment-and-neighbourhoods/flooding/flood-and-watermanagement/sustainable-drainage-systems-guidance-2022-update#Design_principles This indicates the design requirements that are acceptable to the LLFA.

Please note, if there are any works proposed as part of this application that are likely to affect flows in an ordinary watercourse, then the applicant is likely to need the approval of the County Council (or appropriate Internal Drainage Board). In line with good practice, the Council seeks to avoid culverting, and its consent for such works will not normally be granted except as a means of access. It should be noted that this approval is separate from planning. It should be demonstrated within detailed design that the development does not increase flood risk both on and off site and aims to improve flood risk wherever possible

Local Access Forum Comments

NORTH YORKSHIRE

LOCAL ACCESS FORUM

Contact:
Direct Di

County Hall
Northallerton
North Yorkshire
DL7 8
Tel:
Email

www.northyorks.gov.uk

22 June 2026

FAO

Application: ZD26/00360/EIASCR - Hope Moor Wind Farm

The North Yorkshire Local Access Forum is surprised and disappointed that it has not been included amongst the initial consultees for the scoping report. Under our remit from the Secretary of State (CROW Act 2000) the Forum is required to advise Sec 94(4) bodies on matters of access to the countryside, but the applicants have failed to respect this. We therefore act in accordance with our instructions to be proactive and have the following comments to make:

- There are rights of way running through the actual turbine site, and several others which will be affected by the proposed construction route. The impact on users of these public paths has not been acknowledged anywhere in the scoping report, nor has it been recognised that most of the land in question is Open Access land so informal 'roaming' rights also exist. We would advise the applicant that the *enjoyment* of public rights of way is legally protected under The Highways Act 1980. Tranquility is a protected characteristic of the area's rights of way. This means that vibration and sound from the turbine blades and the shadow flicker would have a seriously negative impact on that public enjoyment, but Olsen has neglected to address this issue. This impact would be felt some distance on access beyond the immediate site.
- The Forum also has grave concerns about the effect of the construction traffic on the safety of those vulnerable road users (walkers, cyclists and horse-riders) on Moor Lane who value the lightly used route as a pleasant refuge from everyday traffic. Moor Lane, which is an integral part of the network linking several rights of way, would be overwhelmed by the size and weight of construction traffic for which it was never intended, and is not of a sufficiently strong structure. The mitigation measures suggested would change the character and integrity of this narrow lane beyond recognition and the Forum therefore advises that Moor Lane is not a suitable access route to Hope Moor.

The Local Access Forum apologises that we could not make use of the response format provided, which was unsuitable for our purpose. However, we welcome feedback and further consultation as the process progresses, and contact should be made through our secretary:

Yours sincerely

NYLAF Secretary
Signed on behalf of: North Yorkshire Local Access Forum

Local Highway Authority

Introduction:

An EIA Scoping Opinion is requested for a proposal to install up to 23 three-bladed wind turbines with a tip height of up to 200metres which will generate more than 100Mw of renewable electricity on approximately 1,000ha of moorland/agricultural land at approximately 500m above sea level.

Project Construction timescale is envisaged to take approximately 18 months.

Associated infrastructure work is likely to include hardstanding areas, access tracks and site accesses, watercourse crossing, Haul Route for construction vehicles, on-Site substation(s) and compound(s), temporary construction compounds, batching plant, borrow pits, on-Site underground cabling, drainage, CCTV, fencing, anemometry mast(s), offsite street works to mitigate vehicle/trailer overrun and oversail, services and internal cabling work.

Site access will be required for the delivery of wind turbine components, construction materials and general construction traffic, with the majority of construction traffic expected to travel from the A66 Trunk Road (Strategic Road Network) before routing south from the A66/Smallways junction via Low Lane towards the village of Newham and then via Barningham Road and/or Moor Lane toward the turbine installation site. Creating access points will involve localised modifications to the existing road network to form new temporary site entrances and exists to ensure safe vehicle movement and to minimise disruption to other road users

The Applicant is investigating two options to manage construction traffic and to reduce reliance on local road by creating a dedicated haul route from Barningham Road from a point between Barnwell House and Sussex House. The two potential options are currently being considered comprise:

- Option 1: A haul route linking Barningham Road to Moor Lane, from where construction traffic would continue to the main wind farm site.

- Option 2: A direct haul route linking Barningham Road to the main wind farm site.

The final haul route alignment will be informed by environmental and engineering surveys taking into consideration many factors.

The Applicant is aware that the A66 Trans-Pennine Route was granted a Development Consent Order and is scheduled for upgrading to dual carriageway status and the timing of these works will have to be monitored by the Applicant, as works on the A66 upgrade have the potential to impact on abnormal load movements associated with Hope Moor Wind Farm

It is understood that the Applicant's position on the Grid Connection is unknown at this time and a separate application for grid connection will be via the District Network Operator.

The application is being treated as a Nationally Significant Infrastructure Project for which a development consent order is required and therefore the Planning Inspectorate will examine the application and make a recommendation to the Secretary of State.

The Applicant considers the construction phase of the development to be worst-case scenario and has requested the decommissioning phase of the wind farm project which is likely to be some 30 years in the future is scoped out, as being too far in the future to predict.

Reference to EIA Scoping Report Chapter 11 – Access, Traffic and Transport

The Applicant has utilised the Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement, renamed as The Institute of Sustainability and Environmental Professionals (ISEP) in July 2025 as guidance for its review of the Access, Traffic and Transport Chapter. Table 11-6 summarises the impacts that are proposed to be 'scoped in' whereas Table 11-7 summarises the impacts that are proposed to be 'scoped out' In response to Questions Q11.1 to Q11.4, under paragraph 11.9.1 of the EIA Scoping Report, North Yorkshire Council as the Local Highway Authority responds as follows:

Q11.1: Is the proposed method acceptable?

The LHA considers the content of the chapter to be acceptable and is in agreement with Table 11-6 and 11-7 forming the bases of the 'Scoping Opinion'

Q11.2: Are there any key locations on the road network within the Study Area that consultees would wish to see considered as sensitive receptors?

The Village of Newsham will be a sensitive receptor, plus any properties that are located immediately adjacent to the proposed Construction Traffic Route within the study area.

Q11.3: Are there any locations on the road network within the Study Area with atypically-high accident rates? It is recommended that the Applicant seeks the view of National Highways in respect of the A66/Smallways junction.

Q11.4: Are there any particular committed developments that consultees would wish to see included in the cumulative assessment?

The LHA are not aware of any committed developments which will cause a significant cumulative impact.

Other Local Highway Authority Comments:

1) The LHA consider the construction phase to be the worst case scenario and therefore it is

reasonable to assume that the decommissioning stage would be less impactful, as it is likely to generate fewer vehicle movements than the construction phase.

2) The LHA note that the Grid Connection is to be 'scoped out' of the project and will come forward as part of the District Network Operator (DNO) statutory powers. It is envisaged that NRSWA S50 Agreements will be required for apparatus placed within the adopted highway network.

3) The feasibility of using 'on-site borrow pits' to extract materials in sufficient quantities to serve the project will need to be demonstrated prior to the production of the Transport Assessment, as the availability of on-site material this will likely ameliorate the number of construction related trips on the highway network during the construction phase.

4) The LHA considers that the application site would benefit from an on-site concrete batching plant where this can be secured, which has the potential to ameliorate construction traffic trips on the road network.

5) The applicant reports that Abnormal Indivisible Load Vehicles (AILV) will be required to deliver turbine components to site from Able Seaton Port and Teesport requiring off-site highway works/streetworks to accommodate abnormal wide/high loads and oversailing rights. The applicant should at an early juncture review the transport route for bridges and structures which may require Bridge Assessment / Strengthening Work through established procedures that are in place to manage abnormal load movements and prevent risk to structural assets.

6) It is noted under paragraph 11.5.2 that the applicant will require that "all HGVs operated by the Principal Contractor (PC) must have Global Positioning System (GPS) trackers, allowing their speed and routeing to be recorded". Whilst this is welcomed, from experience, the LHA are mindful that sub-contractors and third party delivery companies are often the cause of transgressions and therefore the LHA will condition within the Construction Traffic Management Plan that all deliveries to/from Site are recorded with the date and time-in/time out plus the vehicle registration plate details, with this on-site log being available for inspection by the LHA/LPA at any time.

Public Health Comments

Hi [REDACTED]

Thank you for consulting Public Health on the ZD26/00360/EIASC - Hope Moor Onshore Windfarm - EIA Scoping and Consultation and Regulation 11 notification and ES scoping report. We have reviewed the documents available on the Planning Inspectorate Project information page.

It is noted that the applicant has scoped out Human Health as a stand-alone chapter as these matters will be picked up within the corresponding technical chapters associated with air quality, noise, access, traffic, landscape and socioeconomics. Public Health recommend that any assessment on human health is carried out using an industry standard methodology. For the purposes of Human Health, regardless of it being part of a combined or standalone chapters, this would be The Institute of Environmental Management and Assessment (IEMA) Guide to Determining the Significance for Human Health in Environmental Impact assessment.

Effective Community engagement can act as a mitigation measure and contribute to reducing some of the mental and physical health impacts that can occur as a result of worry, fear, stress and anxiety arising from the application within the community and the population. The application could consider the Government's document [Community Benefits Guidance for Onshore Wind in England](#) when developing a community engagement plan for this application.

End

Best wishes

[REDACTED]
Public Health Manager

Public Rights of Way Comments

HI 12 Public Rights of Way

It has been acknowledged that during the construction phase of the proposed wind farm, a number of public rights of way within the application site boundary will need to be closed. We would expect such closures to be kept to a minimum number of routes, and for a minimum amount of time. Alternative routes should be provided if public rights of way are subject to temporary closure orders. Where possible, access routes for both the construction and maintenance of the proposed wind farm should not utilise existing public rights of way. No turbine blades should be allowed to over sail any public rights of way, and the turbines should be placed at such a distance from each public right of way to ensure that there would be no risk to users from topple events, blade disintegration, or ice throw. We would expect the turbines to be placed at a distance of twice the tip height for public footpaths, and three times the tip height for public bridleways

i) There is a Public Right of Way or a 'claimed' Public Right of Way within or adjoining the application site boundary – please see the attached plan.

ii) If the proposed development will physically affect the Public Right of Way permanently in any way an application to the Local Planning Authority for a Public Path Order/Diversion Order will need to be made under S.257 of the Town and Country Planning Act 1990 as soon as possible. Please contact the Local Planning Authority for a Public Path Order application form.

iii) If the proposed development will physically affect a Public Right of Way temporarily during the period of development works only, an application to the Highway Authority (North Yorkshire Council) for a Temporary Closure Order is required. Please contact the Council or visit their website for an application form.

iv) the existing Public Right(s) of Way on the site must be protected and kept clear of any obstruction until such time as an alternative route has been provided by either a temporary or permanent Order.

v) It is an offence to obstruct a Public Right of Way and enforcement action can be taken by the Highway Authority to remove any obstruction.

vi) If there is a "claimed" Public Right of Way within or adjoining the application site boundary, the route is the subject of a formal application and should be regarded in the same way as a Public Right of Way until such time as the application is resolved.

vii) Where public access is to be retained during the development period, it shall be kept free from obstruction and all persons working on the development site must be made aware that a Public Right of Way exists and must have regard for the safety of Public Rights of Way users at all times.

Applicants should contact the Council's Countryside Access Service at County Hall, Northallerton via CATO@northyorks.gov.uk to obtain up-to-date information regarding the exact route of the way and to discuss any initial proposals for altering the route.

From: [REDACTED]@northyorksfire.gov.uk>
Sent: 04 June 2026 13:08
To: Hope Moor Wind Farm <HopeMoorWindFarm@planninginspectorate.gov.uk>
Subject: North Yorkshire Fire Service Response

[REDACTED]
Good afternoon,

The site proposed is clearly in a remote elevated area of North Yorkshire.

From a fire service perspective, I would like to highlight the following points with regards to the application for consideration.

1. **Access.** In the event of an emergency will access arrangements allow for fire service vehicles to access all parts of the site? In terms of emergency issues, they could be as a result of a fire, rescue at height or impact from an object. This is not an exhaustive list, but I feel does highlight legitimate emergency occurrences that may affect some part of the site during its lifetime.
2. **Fire.** In the event of a fire the drop down from the wind turbine may well cause secondary fires to the land. Areas of moorland and associated peat can cause significant fires that due to location are difficult to extinguish. Fires to the wind turbine would be difficult to manage due to the height and a defensive posture adopted that protects exposure risks. Early warning of fire is essential so an appropriate response can be mobilised. During the construction / decommission phases fire has been highlighted as a risk due to the project and safety measures would need to be implemented.
3. **Rescue from height.** In the event of an emergency at height access to turbines by specialist working at height teams would need to be provided.

If you require any further information or clarity to any of the points above please get in touch.

I look forward to any future correspondence with regards to the site.

Kind regards,

[REDACTED]
Station Manager
Protection North & West
Fire Investigation Officer
[REDACTED]





**PROUDLY
SUPPORTING
THOSE WHO
SERVE.**

From: [REDACTED]@northumberland.gov.uk>
Sent: 08 June 2026 13:19
To: Hope Moor Wind Farm <HopeMoorWindFarm@planninginspectorate.gov.uk>
Cc: [REDACTED]@northumberland.gov. [REDACTED]
[REDACTED]@northumberland.gov.uk>
Subject: Hope Moor Winfarm - Scoping Report (EN0110038)

[REDACTED]
Dear Ms Park

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) – Regulations 10 and 11

Proposed application by Fred. Olsen Renewables Ltd (the applicant) for an Order granting Development Consent for the Hope Moor Wind Farm (the proposed development)

Scoping consultation and notification of the applicant's contact details and duty to make available information to the applicant if requested

I refer to your letter dated 29 May consulting Northumberland County Council on the Scoping Report for the proposed Hope Moor Windfarm.

The location of the proposed windfarm is about 40 kilometres south of the Northumberland County boundary. The figures showing zones of theoretical visibility suggest that none of the turbines will be visible from viewpoints with Northumberland.

The County Council therefore has no comments to make on the Scoping Report.

Yours sincerely

[REDACTED]
Case Officer

[REDACTED] MA MPhil MRTPI
Planning Consultant
Planning Services
Northumberland County Council
County Hall
Morpeth
Northumberland
NE61 2EF

[REDACTED]
[REDACTED][@northumberland.gov.uk](mailto:[REDACTED]@northumberland.gov.uk)

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We have made a few key improvements to our site to make our services easy to access. Now you can do everything from paying your council tax, to reporting a faulty street light online. Go to: www.northumberland.gov.uk and click 'pay, apply or report' to access the relevant forms.

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From: Sphere Enquiries <enquiries@sphere-connections.co.uk>
Sent: 08 June 2026 08:50
To: Hope Moor Wind Farm <HopeMoorWindFarm@planninginspectorate.gov.uk>
Subject: Re: EN0110038 - Hope Moor Onshore Windfarm - EIA Scoping and Consultation and Regulation 11 notification

Hi Emily

Thank you for taking the time to share these details with us.

I can confirm that Sphere Energy Connect has no assets in the vicinity of these works and have no comments to make at this time. We are a new IDNO business just entering the market and still completing Regulatory processes in order for us to operate an asset base within the UK.

Good luck with the project.

Thanks



[Redacted] | Head of Asset Management &
Operations | Sphere Energy Connect

[Redacted] -[connections.co.uk](mailto:enquiries@sphere-connections.co.uk) | [Redacted]

Internal Use

Emily Park
Planning Inspectorate
HopeMoorWindFarm@planninginspectorate.gov.uk

Date: 11/06/2026
Our 26/01190/CAA
Your EN0110038

ref:

This matter is being dealt with by [REDACTED], Senior Planning Officer,

Telephone: [REDACTED]

E-mail: [REDACTED] [@sunderland.gov.uk](mailto:[REDACTED]@sunderland.gov.uk)

Dear Emily Park,

RE: Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) -Regulations 10 and 11
Proposed application by Fred. Olsen Renewables Ltd (the applicant) for an Order granting Development Consent for the Hope Moor Wind Farm (the proposed development) - Scoping Consultation.

Thank you for your consultation on the afore mentioned consultation. The Local Planning Authority would like to offer the no comments in regarding the proposed development. The Local Planning Authority do not wish to be included in third party consultations going forward.

I trust that the advice set out above proves to be of assistance. However, should you have any queries about anything contained in this letter, please do not hesitate to contact my Planning Officer named above.

Yours sincerely,

[REDACTED]

Development Control Manager

Delivering services for a better future

26 June 2026

To Whom it May Concern

Hope Moor Wind Farm – Nationally Significant Infrastructure Project (NSIP)

YDNPA Response to Scoping Report (EIA) Consultation

1.0 Introduction

1.1 The Yorkshire Dales National Park Authority (YDNPA) has been consulted on a request for a Scoping Opinion that has been submitted to the Secretary of State (SoS) by Fred. Olsen Renewables Ltd ('the applicant') in relation to the Hope Moor Wind Farm project, under Regulation 10(1) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('EIA Regulations'). The Scoping Opinion stage is of critical importance as it will provide the applicant with the scope, and level of detail of the information to be provided in the Environmental Statement (ES).

1.2 Regulation 10(6) of the EIA Regulations states that the SoS must not adopt a scoping opinion in response to a request until the relevant 'consultation bodies' have been consulted.

1.3 This correspondence constitutes YDNPA's written response to the Regulation 10(6) consultation, and specifically its representations regarding the contents of the applicant's Scoping Report.

1.4 The following comments, observations and recommendations regarding the proposed scope and contents of the subsequent ES are provided without prejudice to any following non-statutory and statutory representations that the YDNPA will make in the future with regards to the proposed development and the NSIP process.

1.5 The YDNPA is disappointed that the applicant has not engaged earlier with officers of the National Park Authority in the process, particularly where the YDNPA's input vis-a-vis the impacts on the YDNP could have influenced and been of benefit to a comprehensive and transparent site selection process.

2.0 Executive Summary



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National Park Authority

2.1 As well as identifying omissions and making recommendations in terms of relevant data/information sources and viewpoints, this YDNPA response considers that the applicant's Scoping Report has unduly 'scoped out' for further assessment (within the ES) several important matters/topics related to 'Landscape and Visual', 'Dark Skies and the Impact on the Dark Sky Reserve', 'Archaeology and Cultural Heritage', Ecology', 'Ornithology' and 'Socio-Economics'.

2.2 In relation to the 'Landscape and Visual' subsection, the YDNPA has concerns regarding the 20km Study Area proposed (for the assessment of landscape character) and recommends that the proposed Study Area is increased in order to include consideration/assessment of the impact on the landscape character of the upland areas within the south of the YDNP while also assessing the cumulative landscape effects of existing and proposed infrastructure development from important viewpoints within the National Park. The YDNPA also consider that the project is likely to have significant effects on the stated 'special qualities' of the YDNP. The experiential qualities of tranquillity, remoteness and solitude are likely to be acutely affected by the proposed development and should be 'scoped in' as important considerations in any 'Special Qualities' Assessment as part of the ES. The YDNPA also considers that a wider, holistic approach to landscape impact should be scoped in which assesses the potential significant effects on the wider visual envelope that includes not only the YDNPA but the adjoining North Pennines National Landscape.

2.3 The YDNPA considers that there are likely to be significant effects on the landscape and ecology of the YDNP as a result of the proposed development. In consideration that dark skies are a recognised Special Quality of the YDNP and that the National Park has designated Dark Sky Reserve (DSR) status, the YDNPA recommend that 'Dark Skies' merits its own chapter within the ES. The YDNPA is of the opinion that there has been an inadequate identification of receptors within the Scoping Report to be able to conclude that the proposed 20km Study Area (for assessing the effects of artificial lighting) is sufficient, and a wider Study Area (potentially up to 45km) is recommended. Any assessment of lighting on the dark skies reserve of the National Park should assess/account for specific impacts on the 'Core' and 'Buffer' areas of the DSR.

2.4 The YDNPA has concerns that the Scoping Report proposes to limit the study/assessment area on heritage and the historic environment to the application site boundaries. The YDNP contains a number of designated and undesignated heritage assets that represent a rare survival of a large scale, complex prehistoric landscape, as well as a relatively large number of assets associated with later mining and industrial activity. Potential physical impacts on these assets (as a result in



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potential changes in the hydrology of the area), on their settings, and impacts on the wider, holistic heritage landscape are likely to be significant and it is recommended that these should be scoped in for assessment as part of the ES. In addition, the YDNPA disagrees with the Scoping Report in terms of the stated intention to scope out the impact on Conservation Areas, particularly the Swaledale and Arkengarthdale Barns and Walls Conservation Area, whose rare and special qualities are likely to be significantly affected by the proposed development.

2.5 In respect to ecology (including ornithology), the YDNPA considers that the Scoping Report has not adequately accounted for the potential significant effects on the ecology of the YDNP, and recommends that the ES includes assessments of cross-boundary effects on habitats and species, including potential effects on blanket bog (an irreplaceable habitat and natural storer of CO₂ found within the application site but which is directly connected to blanket bog areas within the National Park) and bird species. The YDNPA also disagrees with the scoping out of reptiles and invertebrates, populations of which could be significantly affected by the proposed development. In addition, the effects of artificial lighting on several species are likely to be significant and should be scoped in. The cumulative impacts on bird populations as a result of existing and proposed renewable energy schemes should also be scoped in.

2.6 The YDNPA disagrees with the stated intention within the Scoping Report to scope out the socio-economic impacts of the proposed development. The significant effects of the proposed development on the landscape and the experiential Special Qualities of the National Park are likely to have significant knock-on effects with regards to tourism/recreation, impacting visitor numbers and the local economy. The YDNPA recommend therefore that the socio-economic impacts are scoped in.

3.0 Statutory and Policy Context

Legislative Context:

3.1 The Yorkshire Dales National Park was designated in 1954 for its natural beauty and outstanding opportunities for recreation and relaxation. The YDNP covers 841 square miles, having been extended in 2016.

3.2 The National Parks and Access to Countryside Act 1949 (as amended by Section 61(1) of the Environment Act 1995) sets out the statutory purposes of National Parks, i.e.



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(a) conserving and enhancing the natural beauty, wildlife and cultural heritage of National Parks, and

(b) promoting opportunities for the understanding and enjoyment of the special qualities of National Parks by the public.

3.3 Where it appears that there is a conflict between the aforementioned two purposes, the Act states that greater weight shall be given to purpose (a) above.

3.4 The YDNPA is the Local Planning Authority (LPA) for the area within the boundaries of the YDNP. However, it is important to note that Section 62(2) of the Environment Act 1995 requires any 'relevant authority' (the definition of which includes any Minister of the crown, public body, statutory undertaker or person holding public office) to have regard to the two National Park purposes in exercising or preforming any functions in relation to, or so as to affect, land in a National Park.

3.5 This statutory requirement has been subsequently amended through section 245 of the Levelling Up and Regeneration Act 2023 which amends section 11 of the National Parks and Access to the Countryside Act 1949 so that any relevant authority (planning inspectors, Ministers of the Crown etc), in performing any functions that may affect land within a National Park must 'seek to further' the statutory purposes of a National Park (replacing the previous requirement to 'have regard to'). The High Court¹ has held a decision-maker to do more than simply weigh any effect in the balance; in order to discharge the strengthened duty, the decision-maker must determine whether the proposed development is consistent with the statutory purposes and [if it is not] they must consider whether (and explain why) permission should nonetheless be granted.

3.6 'Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes' (DEFRA | December 2024) sets out how the aforementioned strengthened statutory duty for Protected Landscapes (in England) is intended to operate and provides 'broad principles' on complying with it. The Guidance clarifies that functions include determining nationally significant infrastructure projects and that the strengthened statutory duty applies to relevant authorities undertaking any function outside of the designated boundary of a Protected Landscape but which may have an effect on land within it, recognising the importance of the setting of Protected Landscapes to their natural beauty, 'special qualities' and key characteristics:

"Natural beauty, special qualities, and key characteristics can be highly dependent on the contribution provided by the setting of a Protected

¹ New Forest NPA [2025] EWHC 826



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Landscape. Aspects such as tranquillity, dark skies, a sense of remoteness, wildness, cultural heritage or long views from and into the Protected Landscape may draw upon the landscape character and quality of the setting... Development and the management of land, water and estates located in the setting have the potential to adversely affect the natural beauty, special qualities, and key characteristics of a Protected Landscape.”

3.7 The Guidance also recognises that functional connectivity is important where there are flows or close inter-connection between a Protected Landscape and its setting, e.g. ecological connectivity where species are able to move across and between areas in and outside of the Protected Landscape boundary; a shared water catchment and PROWs/Open Access Land and other recreational land that join the designated area to the wider countryside.

National Policy Statements:

3.8 The revised Overarching National Policy Statement for Energy (EN-1) (December 2025) sets out the national policy for nationally significant energy infrastructure including renewable energy schemes EN-1 acknowledges that National Parks, National Landscapes and the Broads have been confirmed by the government as having the highest status of protection in relation to landscape and natural beauty, stating that projects should be designed sensitively given the various siting, operational, and other relevant constraints. (5.10.7)

3.9 Of relevant importance to this NSIP is the clarification within EN-1 (5.10.8 and 5.10.34) that the statutory duty that applies to relevant authorities to seek to further the purposes of nationally designated landscapes (including National Parks) also applies when considering applications for projects outside of the boundaries of these areas where the development may have impacts within them. In these locations, projects should be designed sensitively given the various siting, operational, and other relevant constraints. Although the fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse consent (5.10.34), the Secretary of State should nevertheless be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development, with the aim being to avoid harming the purposes of the nationally designated landscape, or to minimise adverse effects on the designation.

3.10 EN-1 requires the Secretary of State to consider whether the project has been designed carefully, taking account of environmental effects on the landscape and



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siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation (5.10.37). EN-1 also states that the Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project (5.10.35)

3.11 While EN-1 states that all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites (5.10.13), the Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, including visitors to the local area, outweigh the benefits of the project.

3.12 EN-1 is clear that the landscape and visual assessment for the project which may affect National Parks, National landscapes and The Broads should include the effects on natural beauty and the special qualities of these areas (5.10.20) and also include an assessment of the visibility/conspicuousness of the project, and the potential impacts on views and visual amenity. This should include the effects of light pollution (including dark skies), local amenity and nature conservation (5.10.21)

3.13 The revised National Policy Statement for Renewable Energy Infrastructure (EN-3) was published in December 2025 and in conjunction with EN-1, provides the primary policy for decisions in respect of nationally significant renewable energy infrastructure. EN-3 recognises that onshore wind farms may be proposed in higher areas with exposed topography and as such may have a wider zone of visual influence than other types of onshore energy infrastructure (2.12.96) An assessment should be made of the potential impact on the statutory purposes of protected landscapes. (2.12.98) The main landscape and visual impacts to a localised level should be mitigated through design insofar as practically possible, noting some wider visual impacts are also likely to be expected given the nature of the technology (2.12.125)

Yorkshire Dales National Park Management Plan 2025-30:

3.14 *'Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes'* (DEFRA | December 2024) states that when seeking to further the statutory purposes of National Parks, relevant authorities should consider the information contained in a Protected Landscape's Management Plan.

3.15 The [Yorkshire Dales National Park Management Plan 2025-30](#) is the current Management Plan for the YDNP. The Management Plan includes a description of the National Park's 'Special Qualities' as well as six long-term ambitions (for what the



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National Park should look like by 2040) and 40 specific objectives (to help achieve those ambitions and protection of the National Park's 'Special Qualities').

3.16 A full version of the Yorkshire Dales National Park Authority '[Special Qualities](#)' as listed within the YDNP Management Plan (2025-30) is available online via this weblink.

Yorkshire Dales National Park Local Plan 2025-40

3.17 Although not subject to the Town and Country Planning Act 1990 or the Planning and Compulsory Purchase Act 2004 (Section 38(6), EN-1 (paragraph 5.10.17) states that the landscape and visual assessment (taken as part of the NSIP process) should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents.

3.18 Although at the time of writing the development plan for the areas within the designation boundary of the YDNP that most affected by the NSIP development is the Yorkshire Dales Local Plan (2015-2030), this adopted Local Plan is soon to be replaced by the new ('emerging') Yorkshire Dales Local Plan (2025-2040) which is at an advanced stage and scheduled to be adopted at the end of June 2026. Given the timescales for the NSIP, it is therefore considered pertinent at the time of writing to make reference to what the YDNPA consider to be the relevant policies of the aforementioned emerging Local Plan, rather than those of the adopted Local Plan. The policies and appendices most relevant to the consideration of this NSIP are listed below:

- Policy CP1 (Sustainable Development)
- Policy CP2 (National Park Purposes)
- Policy CP6 (Design)
- Policy CP7 (Energy requirements)
- Policy CP8: Landscape Character
- Policy CP10 (Major Development)
- Policy L4 (Open Upland);
- Policy L6 (Dark Night Skies)
- Policy NE1 (Protecting Wildlife Sites, Species and Networks)
- Policy NE2 (Protecting irreplaceable habitat, trees, hedgerows and walls)
- Appendix 1 (Special Qualities of the National Park)



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National Park Authority

4.0 Observations/Comments on Specific Chapters of the Scoping Report (Main Text)

CHAPTER 5 (LANDSCAPE AND VISUAL)

Brief Overview:

4.1 The landscape of the YDNP is characterised by wild, remote moors interspersed with sheltered, farmed valleys (or dales). The unique character of the Dales stems from its pattern of underlying geology and a distinctive pattern of pastoral farming, which has shaped the landscape over centuries. It is the close relationships between rock types, landform, climate and the resulting history of human activities that are clearly visible in the landscape and which define many of the area's special qualities.

4.2 The unique landscape character of the YDNP is reflected in many of the National Park's identified 'Special Qualities' (as per the link on page 4 of the YDNP Management Plan (2025-2030) and reproduced in Appendix 1 of the emerging YDNP Local Plan 2025-40), including, but not limited to:

- Dales with distinctive stepped profiles
- Glacial and post-glacial landforms and features
- Traditional pastoral landscape
- A highly legible, contrasting landscape

4.3 Related to the aforementioned landscape qualities of the YDNP are a number of identified 'experiential' Special Qualities (included within the 'Cultural heritage' subsection), which include:

- 'Enjoying the experience being here' (i.e. the experience of positive emotions triggered by the beauty, grandeur, and spirit of place of the YDNP)
- Extensive areas where a true sense of tranquility, remoteness and solitude can still be found
- The experience of natural sounds of wind, water and birdsong and its importance to the overall recreational experience
- Expansive views
- Dark night skies

4.4 It is the position of the YDNPA that the proposed development is likely to have significant landscape effects on the aforementioned visual and experiential Special Qualities of the National Park, and as such, the visual and experiential effects of the proposed development should be 'scoped in' and appropriately assessed as part of any subsequent Environmental Statement (ES).



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National Park Authority

Observations/Comments (in relation to the contents of the Scoping Report):

a. Zone of Theoretical Visibility (ZTV) and Proposed 20km Study Area

“Following a review of the Zone of Theoretical Visibility (ZTV) (Figures 5.2 – 5.9) for the Project, it is proposed that the assessment of landscape character effects focusses within 20 km. As described in Section 5.6, the 20km Study Area, reflects the reduced extent of theoretical visibility found beyond 20km and is therefore considered a more appropriate area in which to focus the identification of potentially significant landscape character effects.” (5.2.1.-5.2.2.)

4.5 The YDNPA has concerns regarding the 20km Study Area proposed for the assessment of landscape character and recommends that the proposed Study Area is increased in order to include consideration/assessment of the impact on the landscape character of the upland areas within the south of the YDNP (including Coverdale and the Three Peaks of Pen-y-ghent, Whernside and Ingleborough) While the standard reasoning (as set out at 5.2.1.-5.2.2. of the Scoping Report) for limiting the study area for the assessment of landscape character to 20km is understood, as shown by the ZTVs, such long-range views of the turbines from various elevated vantage points within the south of the YDNP (looking northwards) will be theoretically possible, and given the elevated positions of both the aforementioned vantage points and of the site of proposed the turbines themselves, the ‘in practice’ screening provided by intervening natural and man-made features that is usually factored in when considering the extent of a study area would be less applicable in this situation.

4.6 The YDNP is also concerned that limiting the study area to 20km and not including the elevated vantage points within the southern Dales risks not appropriately assessing the potential cumulative impacts on landscape character and on the experiential ‘Special Qualities’ of the YDNP as a result of both the Hope Moor development and other major infrastructure development (both planned and constructed) located to the south, south-west and west of the YDNP, including wind turbine development adjacent within the M6 corridor. Of specific concern in this respect would be the failure to consider the cumulative impacts from elevated, panoramic vantage points within the south of the YDNP where views of both the Hope Moor wind turbines (looking north) and of the proposed Calderdale Energy Park turbines (looking southwards, and currently subject to its own NSIP application) would be theoretically visible. Such a cumulative and multi-directional visual impact form some of the most important and cherished viewpoints within the YDNP is likely to have a significant effect on the landscape character of the YDNP and on several



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of its identified experiential ‘Special Qualities’, such as tranquility, remoteness and solitude.

b. ‘Key sources of information for Landscape and Visual’ (Table 5-1)

4.7 The YDNPA would like to draw attention to the apparent omission of the Yorkshire Dales National Park Character Assessment (LCA) from the list of sources at Table 5-1 of the Scoping Report: Main Text and from specific reference in paras. 5.6.10.-5.6.11. with reference to Local Landscape Character Areas. A link to the YDNP LCA is provided below:

[Landscape Character Assessment - Yorkshire Dales National Park : Yorkshire Dales National Park](#)

4.8 Originally produced in 2002, the current updated overview report of the LCA was published in 2020 and describes the hierarchy of landscape character types at a regional scale and the classification of 19 landscape character areas within the YDNP. The NSIP site would be sited adjacent to LCA9 (North Gritstone Uplands) and also within the setting of LCA19 (Swaledale and Arkengarthdale)

4.9 The YDNPA consider that the YDNP LCA and the landscape effects on the specific Local Character Areas within the YDNP must be taken into account in any subsequent landscape methodology/assessment as it pertains to the impact on the landscape of the YDNP.

c. Assessment of the Impacts on the ‘Special Qualities’ of the YDNP

4.10 How a person experiences a National Park and the unique combination of their special qualities underpins English National Park designation and their statutory purposes. In the context of the YDNP, tranquillity, remoteness and solitude are all important experiences of visitors and residents alike and have been identified as special [experiential] qualities of the National Park.

4.11 Due to the significant size and scale of the NSIP development, its impact on multiple short, medium and long-distance views from within the National Park (some of which represent important viewpoints), its incongruous and stark appearance within a rural setting, its artificial dusk/nighttime hub (and potentially mast) lighting and resulting noise and blade flicker will all contribute (both individually and cumulatively) to have a harmful impact on the experience of tranquillity, remoteness and solitude within multiple areas of the YDNP.

4.12 The YDNPA consider that the direct effects of the NSIP proposal on these YDNP experiences/special qualities are likely to result in significant (adverse) effects



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and the Yorkshire Dales National Park's Special Qualities and its setting. The individual and cumulative impacts of the NSIP development on a wide-range of landscape and experiential 'Special Qualities' of the YDNP should therefore be 'scoped in' and appropriately assessed as part of the ES (tranquility and/or 'special qualities' assessment):

- Impacts on tranquility, remoteness and solitude
- Impacts on natural sounds (wind, water and birdsong) which are part of the recreational experience within the National Park
- Impact on expansive views and how they are appreciated.
- Impact on dark night skies

d. Holistic Approach to Landscape Assessment

4.13 It is important that any assessment of landscape considers the landscape character of the YDNP within the wider landscape context and its visual and physical relationship with regards to the North Pennines National Landscape (to the north) in particular. As such, an assessment of the impact on the wider visual envelope needs to be 'scoped-in.'

Response to Questions within the Scoping Report: Main Text:

Q6.1: Do consultees have any comments on the proposed approach and methodology?

4.14 The YDNPA considers that the approach to landscape falls short of the Government's tests for wind farm proposals on the edge of a National Park, as outlined in ref 5-7 and 5-8 (Overarching National Policy Statement for energy 2025 EN-1 sections 5.10.8 - 5.10.20, 5.10.34 and National Policy Statement for renewable energy infrastructure 2025 EN-3 sections 2.3.6 and 2.12.161).

4.15 The use of the word 'indirect' (at paragraph 5.6.17 of the Scoping Report: Main Issues, wording quoted below) is of concern to the YDNPA as although the proposed development is not located physically within the administrative boundary of the YDNPA, there will be clear and obvious direct impacts on views and how the landscape of the YDNPA is experienced.

"A key step in special qualities assessment is identifying which of the SQs may be affected by a proposal. Expanding on the preliminary assessment in Table 5-2 above, this section lists which of the SQs for the YDNP and NPNL are considered as requiring detailed assessment in the LVIA. As the Project is



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located in a landscape outside the YDNP and NPNL, any effects upon these designated areas would be indirect.”

4.16 While the Environment Act is referenced (Ref 5-5) in section 5.4.10 of the scoping document ‘*relevant policy, legislation and relevant guidance*’ the document does not mention s.245 of the Levelling Up and Regeneration Act 2023 which (as referred to in paragraph 2.5 of this response) amends the duty on public bodies in undertaking their functions to further the aforementioned statutory purposes of a National Park

4.17 To this end, the methodology needs to be changed to correct the shortfalls in the approach to assessing the landscape and visual impacts with regards to the YDNP:

“i. Include an assessment of the proposed wind farm on the impact of relevant ‘Special Qualities’ of the National Park., in accordance with paragraph 5.10.20 of EN-1 which states, ‘The assessment should include the effects on landscape components and character (including key characteristics) during construction and operation. For projects which may affect a National Park, The Broads or a National Landscape the assessment should include effects on the natural beauty and special qualities of these areas.’”

4.18 As currently proposed within the Scoping Report, the approach/methodology fails to ‘scope-in’ an assessment of the impact of the proposed development with regards to several of the YDNP’s landscape and experiential Special Qualities, specifically:

- Extensive areas (where a true sense of tranquillity, remoteness and solitude can still be found, which is rare in England today.)
- The natural sounds of wind, water and birdsong (which are important to the recreational experience; the ‘spiritual exercise and enjoyment’ that is at the heart of National Park designation).
- Expansive views (that show to advantage the area’s beauty and variety).

4.19 Paragraph 5.6.18 of the Scoping Report omits reference to/consideration of a whole section of the National Park’s Special Qualities about ‘*Enjoying the experience of being here*’, and these are the special qualities which are particularly pertinent to this proposed development. The YDNPA feel strongly that all of the landscape and



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experiential Special Qualities of the YDNPA need to be ‘scoped in’ as the impact on these landscape-related Special Qualities of the YDNP is likely to be significant (both individually and cumulatively), particularly given the highest status of statutory protection given to conserving and enhancing the landscape and scenic beauty of National Parks. As stated in paragraph 2.12.95 of EN-3:

“National Parks, the Broads and National Landscapes have been confirmed by the government as having the highest status of protection in relation to landscape and natural beauty...”

4.20 Given the high quality and sensitivity of the National Park landscape, and its lack of man-made detractors compared to ‘ordinary’ countryside, even a ‘*minor impact*’ can be assessed as having a significant impact with regards to the National Park’s special qualities of wildness, tranquillity and ‘experience of being here’.

4.21 Paragraph 3.9.2 of the Scoping Report recognises that:

In determining the significance of effect, consideration will be given to two key factors:

- *the sensitivity (or importance, value or vulnerability) of the receptor; and*
- *the magnitude of the predicted change arising from the Project.*

Sensitivity reflects how susceptible a receptor is to change and how critical its functions or values are, while magnitude describes the scale, extent and nature of the impact anticipated.

4.22 Therefore the YDNPA recommend that any landscape and visual assessment of the subsequent ES should ‘scope-in’ otherwise moderate and minor impacts (with regards to the affected landscape and views of the YDNP), and not just those which are moderate-major or greater, (as stated in para 5.4.6 of the scoping document).

“ii. The YDNP Landscape Character Assessment (and other relevant YDNP Plans and Studies) should be taken into account in the methodology/approach to landscape and visual assessment within the ES”

4.23 As referenced at 3.7-3.9 above, the YDNPA has its own Landscape Character Assessment (reference to which appears to be missing from the Scoping Report), which the YDNPA strongly recommend is used in assessing landscape impacts of



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the proposed development, especially figure 5 (tranquillity map) and figure 6 (dark skies and light pollution) which the YDNPA suggest should be used as part of the baseline for the any landscape and visual assessment(s) of the proposed development's impacts)

4.24 In addition, the recreation and tourism policy document '[Special Qualities, Special Experience](#)' is also not referenced from paragraph 5.4.10. of the Scoping Report. The YDNPA consider that they should be referenced/considered, along with the Yorkshire Dales National Park Management Plan (which is referenced at 5-29, but not actually listed in paragraph 5.4.10).

4.25 Both the Yorkshire Dales National Park Landscape Assessment, and '*Special Qualities, Special Experiences*' Report highlight the importance of tranquillity, and the lack of man-made detractors in the National Park landscape underpinning the exceptional recreational experience and scenic quality the area has to offer. The Yorkshire Dales National Park Landscape Assessment overview document, includes CPRE's map of tranquillity for the National Park area (figure 5), and dark skies (figure 6). The section 'forces for change' also highlights the sensitivity of the National Park landscape to development, particularly tall structures (see paragraph 3.2.2), and in 'changing public attitudes' states there is strong public demand for access to nature and for conserving the remaining relatively tranquil and remote areas of the country (see paragraph 3.2.4).

4.26 Also Table 5.1 ('Sources of information') of the Scoping Report, in relation to receptors, should include reference to/consideration of:

- Other significant recreational routes and promoted walks (not just long distance paths) like the Yorkshire 3 Peaks walked by 100,000 people a year, and circular walks promoted by the Ordnance Survey in and around Reeth e.g. Fremington Edge (as recommended by the AA, Trail magazine, Country Walking magazine, YHA),
- The Yorkshire Dales 30 (see www.dales30.co.uk/) notable fells with summits 2000 foot or over, of which there are many in the vicinity of the proposed wind farm, and will be impacted as shown by the maps in Scoping Report volume A.

Q6.2: Do consultees agree with the proposed 45km LVIA Study Area?



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4.27 In the view of the YDNPA, the distance for assessment for landscape designations (Table 5.2 in the scoping document) must be at least 45 km to take account of the open character of the summits and ridges. To illustrate this point, the summits of the Lake District fells can clearly be seen and picked out from the Dales, and vice versa (eg Langdales Pikes and Ingleborough). The proposed wind farm will be as high in elevation, and a distinctive shape, and unlike these summits it will be moving so the eye will be drawn to it. To an observer it will be as obvious in the landscape as any 2000 foot summit. On this basis alone, the windfarm's landscape impact will reach over 45 kms.

4.28 The Scoping Report at para 5.2.1 also states:

'In accordance with NatureScot guidance (Ref 5-1) and with a proposed wind turbine height of up to 200 m, the proposed Study Area for the LVIA of the Project will cover a radius of 45 km from the nearest proposed wind turbine, as shown in Figure 5.1. This is considered to be the maximum radius within which a significant effect could occur given the height of the wind turbines that are being considered. Landscape Designations and Visual Receptors will utilise this 45km Study Area in the LVIA'.

Q6.3: Do consultees agree that the assessment of the effects on landscape character receptors (except landscape planning designations) should focus on areas within a 20 km radius of the proposed wind turbines?

4.29 No, the YDNPA strongly considers that the effect on landscape character receptors should be at least 45km throughout, as visual quality and landscape character are not mutually exclusive or inseparable in the individual's experience, understanding and enjoyment of the landscape. The EIA must consider the setting of the YDNP and the NPNL, this is an important part of people's experience as they approach and travel into these protected landscapes.

Q6.4: Do consultees agree with the proposal to scope out the Landscape Planning Designations where no further assessment is proposed for the LVIA, as set out in Table 5-2?

4.30 While the impact of the proposals will be greatest for the designated landscapes adjacent and in close proximity to the application site boundary, the scale and nature of the proposals are likely to have also have an effect on the setting of the cluster of other designated landscapes throughout this part of England, i.e. Nidderdale

National Landscape, North York Moors National Park and the Lake District National Park.

Q6.5: Do consultees have any comments or suggestions in relation to the Preliminary Representative Viewpoint Locations shown in Table 5-3 and illustrated on Figures 5.2 - 5.5?

4.31 The YDNPA consider that several important viewpoints from within the YDNP have been omitted from the representative viewpoints within table 5-3 of the Scoping Report (and illustrated on figures 5.2-5.5):

Within 20 km:

- Summit of Great Shunner Fell, 360 viewpoint
- Pen Hill Beacon
- Redmire to Grinton road (view just before descending the hill towards Grinton)
- Askrigg to Low Row road (view where it levels out on the side of the ridge)
- Buttertubs road (as it begins to descend into Swaledale)
- Calver Hill, near Langthwaite

Within 30 km:

- Buckden Pike Wharfedale
- Arkleside Moor Coverdale

Within 40 km:

- Great Whernside Wharfedale
- Whernside Three Peaks

4.32 In addition, the YDNPA considers that the impact on long distance linear routes, not just viewpoints, such as the Coast to Coast National Trail, a route of high international profile. The YDNPA considers that the impact is likely to be significant as users of the Coast to Coast may see the windfarm every day getting bigger on their horizon from particular vantage points. Important views from outside of the YDNP boundary (looking into/towards) the National Park also need to be scoped in due to the likely significant visual impacts. In particular, viewpoints from the north (looking southwards) into the Arkengarthdale and Swaledale are likely to be significantly affected as a result of the proposed development. Officer of the YNPA would be happy to engage further with the applicant to identify specific viewpoints.



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Q6.6: Do consultees have any further comments or suggestions relating to the cumulative assessment or the preliminary cumulative sites shown on Figure 5.11?

4.33 Yes – the YDNPA consider that figures 5.11 and 5.12 illustrate the magnitude of landscape change the proposal would bring about, and the potential effect on nationally important landscapes. From a National Park perspective, the plethora of promoted walking and cycling routes (including the iconic and internationally recognised Coast to Coast National Trail) and high moorland roads passing within close proximity will mean the proposed development will have a cumulative impact on visitors to the area.

4.34 As mentioned above, the cumulative landscape impacts vis-a-vis the YDNP of this development in combination with those of the Calderdale Energy Park NSIP proposals (and potentially other, smaller renewable energy schemes) could potentially have a significant effect on the landscape and related special qualities of the YDNPA and thus the assessment of such cumulative impacts should be ‘scoped-in’ to any LVIA and special qualities assessment within the ES (or ‘stand-alone’ assessment(s)).

DARK SKIES AND IMPACT ON THE YDNP DARK SKIES RESERVE

Brief Overview:

4.35 Dark skies are identified as a ‘special quality’ of the YDNP as identified within the National Park Management Plan: *“Dark night skies; as it suffers little from light pollution, the moon, night sky and atmospheric effects can be fully appreciated.”* The National Park Management Plan also contains a specific objective to *‘Maintain the National Park as a place where a true sense of tranquillity and remoteness can still be found, including taking action to retain international ‘Dark Sky Reserve’ status.’*

4.36 In December 2020, the YDNP was designated Dark Sky Reserve (DSR) status and became an International Dark Sky Reserve. An International Dark Sky Reserve is a designated area of public/private land possessing exceptional or distinguished quality of starry nights and nocturnal environment that is specifically protected for its scientific, natural, educational, cultural, heritage and/or public enjoyment.

Observations/Comments:

a. *‘Dark Skies’ as a Separate Chapter within the ES.*



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4.37 Although the impact on dark skies is linked to, and is part of, the landscape impact, there are potential multiple impacts associated with dark skies that go beyond landscape and visual such as: ecological, visitor experience of dark skies (e.g. astronomical visibility), residential amenity/nuisance. Given these multiple, and potentially inter-related impacts, the YDNPA feel strongly that the impact of the NSIP development on the dark skies of the YDNP is likely to be a significant environmental effect that needs to be ‘scoped in’ (and the impacts objectively assessed via a ‘Dark Skies Impact Assessment and/or Night-time Aviation Lighting Impact Assessment’) and that it should form a separate, specific topic chapter within the ES, rather than being part of the larger, holistic ‘landscape and visual’ chapter.

b. Proposed Study Area

4.38 The Scoping Report: Main Text states that the *‘assessment approach and nighttime visualisations will be in accordance with NatureScot guidance, which recommends a Study Area of 20 km for the assessment of visible aviation lighting’* and specifically the NatureScot *‘Guidance on Aviation Lighting Impact Assessment’* (2024).

4.39 This guidance sets out a process to assess the landscape and visual impacts arising from visible aviation warning lighting on onshore wind turbines. It does not cover the assessment of other potential impacts arising from turbine lighting, such as ecological impacts.

4.40 Information on the effects of aviation lighting on birds is provided in NatureScot guidance note [‘The Effect of Aviation Obstruction Lighting on Birds at Wind Turbines, Communication Towers and Other Structures.’](#) It is therefore unclear whether the study area has been derived with full consideration of the impacts on non-landscape and visual impacts.

4.41 The NatureScot guidance note states *‘In some circumstances a larger study area may be appropriate, and the precise requirements should be agreed at scoping stage.’* The Scoping Report states *‘Potential significant effects of visible aviation lighting are considered unlikely beyond 20km, in line with NatureScot guidance.’* It is considered at this stage that there is inadequate identification of receptors in order to conclude that 20km is sufficient, for example, the impact on migratory birds.

4.42 It is therefore recommended that the study area for assessing the impact of aviation lighting is a minimum of 20km but may need to be wider depending on receptors identified beyond landscape, potentially as far as 45km. Officers of the

YDNPA would be happy to be involved in any future discussions regarding the Study Area for the impacts of aviation lighting.

c. Dark Sky Reserve – Assessment of the ‘Core’ and ‘Buffer’ Areas

4.43 Although all of the YDNP is designated as a Dark Sky Reserve, with the Reserve including a ‘core area’ comprising approximately 30% of the area of the National Park and a ‘buffer zone’. The ‘core area’ of the Dark Sky Reserve (located approximately 6km to the south-west of the NSIP site) already meets the criteria for natural darkness and is of high quality. The YDNPA consider that any assessment of the impact of the NSIP development on the dark skies of the National Park (i.e. a Dark Skies Impact Assessment and/or Night-time Aviation Lighting Impact Assessment) should assess/account for specific impacts on the ‘Core’ and ‘Buffer.’

d. Dark Skies Reserve Evidence and Guidance

4.44 The Yorkshire Dales National Park Authority Lighting Master Plan supported the YDNPA’s application for DSR status and its implementation maintains or improves the darkness of the night sky. The principal aim of the LMP is to provide practical advice on mitigating stray light, and the reduction of upward obtrusive light to assist in a better view of the night sky, and maintaining darkness. The LMP is based on external professional lighting audits and appraisals, and contains policy objectives in the form of 14 Plan Statements. The YDNPA therefore consider that it should be treated as a reference document to inform any Dark Skies Impact Assessment, or similar assessment. Data on lighting levels in the Dark Sky Reserve may also be available from [Dark Sky International](#).

e. Approach/Methodology for the Night-Time Aviation Lighting Impact Assessment

4.45 Notwithstanding that it relates to landscape and visual impacts only, the NatureScot guidance note set out a three-stage approach to carrying out a Night-time Aviation Lighting Impact Assessment (NALIA):

- Step 1: Defining the lighting proposal
- Step 2: Understanding the baseline
- Step 3: Assessing the effects of the aviation lighting

Step 1: Defining the lighting proposal:



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4.46 The Scoping Report states 'A key factor in the development of wind turbines greater than 150 m in height is the requirement for them to have visible red, medium intensity (2,000 candela) lights fitted to the hubs, with low intensity lights on the towers, in accordance with Civil Aviation Authority (CAA) guidance. The details of the lighting requirements for the Project are currently being defined along with potential mitigation measures.'

4.47 The NALIA needs to cover the following;

Artificial lighting needed during construction, including:

- vehicle/plant headlights
- floodlighting
- mobile lighting units
- lighting at construction compounds
- temporary compounds will include security and operational lighting.

4.48 Aviation lighting (operation phase)

- In line with CAA guidance as agreed at the point of submission – i.e, 'worse case' (likely specification is red, medium-intensity lights ($\approx 2,000$ candela) on turbine hubs and lower-intensity lights on towers and make clear any assumptions being made on required or final lighting levels.

4.49 Operational site lighting

- Any lighting required at the on-site substation and elsewhere within the site.

4.50 Mitigation:- It is noted in the NatureScot guidance '[The Effect of Aviation Obstruction Lighting on Birds at Wind Turbines, Communication Towers and Other Structures](#)' states that 'white lights appear to be better than red lights (birds appear to show an attraction to red light). Towers with no lighting were least attractive. Kerlinger *et al.* (2010) also showed that steady red lights on turbines were more attractive to birds than flashing red lights.' It is recommended that the mitigation measures have a sequential approach to the most to least effective (eg, reduction in turbine height to below 150m thereby removing the requirement for aviation lighting before considering other reduced lighting mitigation methods such as Aircraft Detection Lighting Systems (ADLS)). Mitigation proposals should also make clear any assumptions being made final lighting levels prior to any sign off by the CAA. The assessment should therefore consider full lit and reduced lighting options so that residual impacts are clear and mitigation is specific.



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Mitigation should also be provided for non-aviation lighting (i.e, construction and other operational lighting).

Step 2: Understanding the baseline:

4.51 An assessment of the baseline should provide the context:

- National Park - Dark Skies are a special quality of the National Park
- Designated Dark Sky Reserve including specific consideration of the Core and Buffer areas.
- The use of Environmental Zones can be applied, but it should not override the circumstances of each individual site. The assessment of the study area should consider the current sky quality condition as a baseline.
- Identify likely sensitive receptors within the study area: humans (visitors and residents), habitat network, bird migration corridors, nocturnal bird species (foraging behaviour – there are barn owls and nightjars in the vicinity - nightjars can forage up to 6km from the nest site), bats (commuting, foraging habitat), landscape and the night sky.
- Identify the cumulative impact on the landscape.
- Impacts of dark skies beyond the National Park boundary which may in turn impact on the National Park Dark Sky Reserve and the interconnection with the wider dark landscape. Consider the efforts of the joint working group 'Northern England Dark Skies Alliance'.

Step 3: Assessing the effects of the aviation lighting:

4.52 The YDNPA agree that the NatureScot guidance note (2024) provides a starting basis for this step. However, the guidance note only covers landscape and visual impacts and, for example, does not cover ecological impacts or the impact of lighting for construction or from other operational lighting sources.

f. Viewpoints

4.53 The Scoping Report: Main Text states that '*visualisations illustrating wind turbine lighting at night will be prepared for inclusion in the LVIA*'. The viewpoints recommended for the lighting assessment include two within/edge of the National Park - Viewpoint 1 - Stang Top (road users/YDNP) and Viewpoint 18 - Downholme Moor (road users/YDNP) (note Viewpoints 1 and 18 are roadside locations on or near the National Park boundary).

4.54 The viewpoints proposed to form the basis for the visualisations for wind turbine lighting are inadequate. They include two edge of park roadside locations only and



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would not provide an adequate coverage for the likely sensitive receptors beyond these two isolated sections of highway.

4.55 The YDNPA therefore strongly recommend that a larger number and wider range of YDNP viewpoints (within 20km) are included, and make the following recommendations:

- Feetham-Langthwaite road – near Bouldershaw House
- road Redmire to Grinton (view just before go down the hill towards Grinton)
- road Askrigg to Low Row (view where it levels out on the side of the ridge)
- Buttertubs road as it begins to descend into Swaledale
- Marrick – highway/settlement
- Tan Hill – highway or near - 'Dark Sky Discovery Site' - Dark Sky Discovery Sites are a nationwide network of places that provide great views and which are accessible to everyone. They have been nominated by local groups and organisations as their top local spot to see the stars.
- Sections of the Coast-to-Coast - National Trail
- Habitats (to be identified) including from the use of the existing ecological data such as the statistics for bats and the ecological features in the study area. There will need to be coverage of bird migratory routes and bat and bird foraging and commuting routes.

4.56 The impact on long distance views beyond 20km, within or beyond 45km need consideration depending on receptors identified.

CHAPTER 6 (ARCHAEOLOGY AND CULTURAL HERITAGE)

Brief Overview:

4.57 The cultural heritage of the Yorkshire Dales is an important component of the landscape character of the National Park, as reflected in the 'Special Qualities' of the YDNP set out within the YDNP Management Plan (2025-2030), including (but not limited to):

- An exceptional range of archaeology (from the Paleolithic Era to the industrial Twentieth Century)
- Remains of former rural industries (including lead and lime extraction and processing sites)
- Distinctive, traditional architecture
- Numerous small, attractive villages and hamlets, most of which have been there for over a thousand years, as well as scattered farmsteads.



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Observations/Comments:

a. Assessment Boundary

4.58 The YDNPA considers that the impact of the NSIP development on heritage and the historic environment outside of the application site (ie. within the National Park) should be **scoped in**. Particular care needs to be taken to assess/understand the potential impacts on specific heritage assets/sites both within and outside of the application site boundary, including the setting of prehistoric monuments located within the YDNP.

4.59 Both Swaledale and Arkengarthdale contain a number of designated and undesignated assets that represent a rare survival of a large scale, complex prehistoric landscape. These sites were often deliberately situated at higher elevations and in some cases with specific alignment or views calculated as part of their setting, and particular care should be taken to look at the views and interrelationships between these sites.

4.60 Pre-historic studies have shown that such historic environments can involve complicated buried archaeological landscapes, and there is a strong possibility that these extend into the boundary of the YDNP. For instance, cists and burials can have ancillary burials that extend across the wider area.

4.61 It is therefore strongly recommended that any surveys (including geophysics and walkover) are extended beyond the application site boundary in order to assess the impact on heritage (including archaeological deposits) sites and features beyond the site boundary (i.e. within the YDNP) and include any necessary/appropriate form of mitigation and management of such sites and features.

4.62 The application site is located just outside the Swaledale and Arkengarthdale Barns and Walls Conservation Area, which is on the Historic England 'Heritage at risk' Register (an aim of the YDNP Management Plan is to have the Conservation Area removed from the Register). While the YDNPA consider that a 10km Study Area is reasonable in order to assess some parts of the Conservation Area that are important to its character and appearance, it is considered that a wider Study Area is **scoped in** that takes into account the whole of the Conservation Area in order to make sure that the potential visual impacts are fully understood across the whole of the Conservation Area.

b. Holistic Approach to Assessing the Impact in the Heritage Landscape



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4.63 The application site is part of wider heritage landscapes (including Paleolithic Era and early -Twentieth Century industrial extraction), and includes areas that extend beyond the site boundary, including into the National Park. Assessments of the impact of the NSIP development on these heritage landscapes need to consider the effect on heritage landscapes more holistically, recognising that the application site is a part of a larger heritage mosaic with inter-relationships and views between various heritage assets and elements of the landscape that make administrative boundaries irrelevant. An initial list of assets that YDNPA consider have the potential for interrelationships/views are listed below:

- Ellerton Priory (Cistercian Nunnery)
- Maiden Castle (Prehistoric settlement and adjacent round barrow)
- How Hill (Settlement)
- Dykes (east and west of Dyke house)
- Arkle Beck Stoen Circle
- Marrick Priory (Benedictine Nunnery)
- Ring cairns (2) on Low Moor
- Cairn at West Moor Bottom, Mudbeck
- Linear earthwork at Harker Hill
- Linear earthwork at Harker Mires
- Embanked small stone circle at Harker Mires on Harkerside Moor
- Bowl barrow at Swale Hall
- Ring cairn on Fremington Edge
- Ring cairns on Riddings Rigg, Reeth Low Moor
- Ring cairn on Fremington Edge Top
- Ring cairns at Cogden Gill

c. Hydrological Impacts on Archaeological Deposits within the YDNP

4.64 Paragraph 6.1.3. of the Scoping Report, Main Text states,

“The assessment will consider direct effects (such as physical disturbance), indirect effects (such as changes in water draining patterns or vibrations which can indirectly affect the preservation of heritage materials), setting impacts (such as changes in the surrounding landscape that may alter the cultural significance of an asset) and cumulative effects (where assets affected by the Project are also likely to be affected by other unrelated development proposals).”

4.65 YDNPA consider that drainage modelling is required in two forms:

- the flow of water through extractive industry remains (i.e. mine workings and the modelling of the direction in which such workings drain) and,
- calculating the water retention curve and the modelling of potential effects on Palaeoecological deposits within the YDNPA boundary.

4.66 YDNPA also consider that there is the potential that groundworks on the application site could lead to capillary action that could result in hydrological damage (e.g. affecting anaerobic preservation conditions) to sensitive archaeological deposits within the YDNP boundary.

4.67 The undertaking of a suite of Paleoecology sampling both inside and outside the YDNPA boundary should be included. The Authority can advise further on this.

d. Key Sources of Information and Relevant Policy, Legislation and Guidance for Archaeology and Cultural Heritage

4.68 Missing from the table/list of ‘Key Sources of Information’ vis-a-vis archaeology and cultural heritage at 6.3.1. of the Scoping Report Main Text is reference to the online repository of field work and sites of the Swaledale and Arkengarthdale Archaeological Group: [SWAAG Home](#)

4.69 In addition, missing from the list of ‘Relevant Policy, Legislation and Guidance’ is reference to the YDNP Management Plan 2025-30 that makes specific references to various aspects of the YDNP’s heritage in its stated ‘Special Qualities’.

e. Relevant Consultee(s)

4.70 Paragraph 6.4.3. of the Scoping Report: Main Text states that:

“All nationally significant designated assets from the National Heritage List for England (NHLE) and the websites of the local authorities which provide details on the location and extent of conservation areas within the 10km Study Area will be subject to an initial setting assessment in order to determine any potential impacts (Appendix 6B). A final scope of assets that have the potential for significant effects as a result of the Project will be agreed with the relevant consultees and assessed in full within the ES.”



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4.71 It is recommended that the contact in this regard (i.e. the setting of designated heritage assets, including conservation areas) at the YDNPA is the Senior Listed Building Officer, Peter Reynolds (Peter.Reynolds@yorkshiredales.org.uk)

f. Non-Designated Assets within the 1 km of the Application Site

4.72 Paragraph 6.4.6. of the Scoping Report states that non-designated heritage assets within 1km of the application site will be identified from the HER records of Durham County Council, North Yorkshire Council and the Yorkshire Dales National Park Authority.

4.73 Please note that the identification of such sites will need to include a cost for the identification and mapping of those sites. These areas have not been fully assessed in the last few years. LiDAR and other data sources would enable mapping highly significant sites. HER's are compiled from a number of data sources collected over a number of years, and so to provide the best possible data some features will need to be mapped and updated.

g. Impacts on Non-Designated Heritage Assets

4.74 Paragraph 6.4.16 of the Scoping Report states that, '*impacts upon non designated heritage assets and unknown buried remains are generally considered an effect of construction.*'

3.75 The potential for buried deposits should be appropriately considered and mitigation measures put in place. At least preservation by record should be considered with regards to any archaeological remains.

h. Paragraph 6.4.16 - Incomplete?

4.76 Paragraph 6.4.16 of the Scoping Report Main Text states that, '*Cultural heritage assets both within the Study Area will be considered for the potential for direct, indirect, settings and cumulative impacts as a result of the Project.*'

4.77 The YDNPA would suggest that this paragraph remains incomplete with the inclusion of the word 'both' indicating that another search criteria (in addition to 'within the Study Area') was intended. This paragraph (likely to have been '*both within and outside the Study Area*') should be clarified, and assuming the intended



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wording suggestion is correct, such an approach to consider assets both within and outside of the suggested Study Area is supported.

i. Proposed 'Scoping Out' of the Swaledale and Arkengarthdale Conservation Area.

4.77 YDNPA strongly disagrees with the proposal to 'scope-out' the impacts on all Conservation Areas within the YDNP boundary, particularly the impacts on the Swaledale and Arkengarthdale Conservation Area. YDNPA's disagree with the assessment in the Scoping Report that the impacts on the Conservation Areas (and the Swaledale and Arkengarthdale Conservation Area in particular) would not be significant. The Swaledale and Arkengarthdale Conservation Area is a nearly unique Conservation Area in terms of its large scale/coverage, character and special qualities. The built and natural landscape within its boundaries, as well as its landscape setting are considered to be of important heritage significance, it is vitally important that an assessment of the effects on the character, appearance and special qualities of the Swaledale and Arkengarthdale Conservation Area are **scoped in** to any heritage impact assessment related assessment/survey work within the ES.

Response to Questions within the Scoping Report: Main Text:

Q6.1: Do consultees agree with the methodology set out, including the use of UAV in areas which are assessed to be a health and safety issue for industry standard surveying?

4.78 YDNPA considers that UAV's have use, however, the nature of the UAV survey would be important, i.e.:

- What would be the resolution of images?
- Who is interpreting?
- The details/specifications of any other survey techniques (LiDAR, muliti/hyper spectral imaging, thermal, etc.)

Q6.2: Do consultees agree with assets and matters scoped out?

4.79 **No.** YDNPA considers that given the nature of the assets laid out in the table relevant table f the Scoping Report, that there is a reasonably high probability for as yet undiscovered archaeological remains that would require consideration/assessment, including a high probability of human remains being present within the area. This should be reflected in the ES and any archaeological and heritage surveys/assessments.



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Q6.3: Are there any assets, not listed in the appraisal, that key consideration should be given to?

4.80 **Yes.** See comments above, particularly in relation to the potentially significant impact on the Swaledale and Arkengarthdale Conservation Area.

Q6.4: Do consultees have any specifications on further visualisations and their locations?

4.81 None at this particular time, although YDNPA would welcome further discussions with the applicants regarding this during the production of the ES.

CHAPTER 7 (ECOLOGY)

Brief Overview:

4.82 YDNP contains one of the best remaining and least fragmented wildlife networks in England. The network comprises 23 UK priority habitats covering almost 110,000 hectares. The main habitats in terms of area are blanket bog (48,000 hectares); grass moorland (21,000 ha) and upland heath (20,000 ha). Over 50,000 hectares are nationally or internationally designated for their wildlife value. contains one of the best remaining and least fragmented wildlife networks in England. The network comprises 23 UK priority habitats covering almost 110,000 hectares. The main habitats in terms of area are blanket bog (48,000 hectares); grass moorland (21,000 ha) and upland heath (20,000 ha). Over 50,000 hectares are nationally or internationally designated for their wildlife value. The YDNP contains three types of internationally designated wildlife sites: Ramsar wetlands; Special Protection Areas (SPAs); and, Special Areas of Conservation (SACs). These cover over 67,000 ha or about 31% of the National Park area.

4.83 A number of the 'Special Qualities' (as identified within the YDNP Management Plan 2025-30) are related to wildlife, including:

- Nationally and internationally important wildlife habitats
- Flower-rich upland hay meadows
- Rare limestone habitats
- Extensive moorland areas
- Areas of broadleaf woodland
- Nationally important population of fauna and flora (e.g. curlew, lapwing, black grouse and ring ouzel; rare lime-loving plants, such as bird's-eye primrose,



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rigid buckler fern, globeflower and baneberry; rare and scarce invertebrates such as the northern brown argus butterfly and the Atlantic white-clawed crayfish; and important mammals, notably the red squirrel).

Observations/Comments:

a. Consideration of the Potential Impacts on the Ecology of the YDNP

4.84 YDNPA considers that the potential impacts on the ecology of the YDNP has not been adequately addressed. Blanket bog habitat (an 'irreplaceable habitat') found within the application site is directly connected to areas within the YDNP, and as stated, there could be permanent and temporary loss or degradation of important habitat via excavation, but also through resulting hydrological/ hydrogeological changes or degradation from dust deposition/air quality impacts. The loss or degradation of blank bog in both the application site and the boundary of the YDNP is likely to have a significant effect on the release of CO₂ into the atmosphere, an assessment of which the YDNP recommends is coped in.

4.85 Therefore, the YDNPA would expect to see the impacts of the proposed development on the habitats and species of the YDNP potentially affected by changes in hydrology, as well as increases in air pollution, dust, noise and 'human-activity' disturbance (during construction, operation and decommissioning), **scoped in** and any effects appropriately assessed as part of the ES.

4.86 While the YDNPA understands that the potential environmental impacts resulting from cable routing (and associated works/traffic movements) is proposed to be assessed through a separate EIA process, the YDNPA reserves the right to comment further on the potential environmental impacts on the YDNP as a result of the cabling/grid connections elements of the proposed development as/when more details are known.

b. Reptiles and Invertebrates – Scoping Out

4.87 The proposals will be taking out and potentially impacting several priority habitats of blanket bog and upland heath. These habitat types are known for supporting populations of reptiles and important invertebrates, as works can alter the local water table or cause direct habitat disturbance. It is recommended that surveys for these species are undertaken so areas to protect reptile populations and significant invertebrate populations can be put into place. All native reptile species are protected under relevant national legislation and are also included on the national lists used to define the Biodiversity Duty of public bodies in the UK.



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4.88 The YDNPA therefore **strongly disagree with scoping out** based on the conclusion that there is considered to be a lack of significant impacts, particularly when the relevant surveys have not been completed and the records centre returned records of common lizard and small heath.

4.89 A lack of evidence for other reptiles and notable invertebrates from the record centre data is not evidence of absence, as often these species are most likely under recorded.

c. Amphibians - Clarification

4.90 The YDNPA has been unable to find any reference to amphibians within the Scoping Report: Main Issues document. It is therefore not clear whether Great Crested Newts and other amphibians have been considered within the Scoping Report, and if so, whether they are proposed to be 'scoped-in' or 'scoped-out'. Clarification should be subsequently provided regarding this matter.

d. NVC - Scoping

4.91 The YDNPA would expect to see surveyor experience for undertaking the NVC survey to be at minimum Level 4 FISC.

e. Bat Scoping

4.92 The YDNPA would question the validity/accuracy of using an online weather website for getting accurate weather data.

Response to Questions within the Scoping Report: Main Text:

Q7.1: Are there any additional baseline data sources that should be used to inform the assessment?

4.93 **Yes.** While the YDNPA consider that the NEYEDC and ERIC are the typical sources for baseline ecological data, it is also suggested that local groups such as Bat Groups, ARG groups etc are also consulted/contacted as they may have further records.



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Q7.2: Do consultees agree that the scope of the surveys undertaken and proposed will be sufficient to inform the assessment?

4.94 **No.** Although the majority of the ecological issues that the YDNPA would expect to see 'scoped-in' have been (within the Scoping Report: Main Issues), as mentioned above, there are nevertheless additional considerations/surveys that the YDNPA would have expected to see mentioned to being 'scoped in' and potentially addressed in the future survey work, such as reptile and invertebrate surveys.

Q7.3: Are the consultees in agreement with the identification of Important Ecological Features taken forward for detailed assessment?

4.95 **No.** As there has been no detailed surveys on reptiles or invertebrates, it is unclear how the geographical scale of importance is at a local/county level. Particularly considering that reptiles are not as common and widespread as the south of England, but rely heavily on heathland and blanket bog habitats in Northern England and as such it would be advantageous to know if the site is important to these species and get a more accurate baseline.

Q7.4: Are the consultees content to scope out the effects in Table 7-7?

4.96 Subject to the comments above, the YDNPA has no further comments regarding the proposed 'scoped out' matters at Table 7-7 of the Scoping Report: Main Issues.

CHAPTER 8 (ORNITHOLOGY)

Observations/Comments:

a. Lighting

4.97 Artificial lighting for wind turbines and associated infrastructure (e.g.. access roads) can have an impact on a range of different species and can cause negative effects on species that are not found within the site but are in close proximity (e.g. nightjar). As stated in the 'Dark Skies' subsection above, a Lighting Impact Assessment is recommended to be undertaken, and the impacts of artificial lighting on species within the National Park, **scoped in** as the YDNPA considers that there are many sensitive species that could be negatively impacted by light pollution,(e.g. Nightjar, bats, invertebrates). A suitable mitigation strategy should be included in a Lighting Management Plan based on the outcome of the assessment. To clarify therefore, as artificial lighting can cause a number of potentially significant issues,



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including, but not limited to, collision risk due to lit turbines, the YDNPA recommends that lighting impacts (on ecology) should not be scoped out.

b. Cumulative Impacts (on Avian Species)

4.98 There is another proposed large wind farm project to the south of the National Park (Calderdale), where a potential impact on displacing breeding upland birds to within the National Park has been identified, which may have an impact on the National Park's breeding population. The proposed Hope Moor development is also likely to have a significant effect on breeding upland birds that needs to be **scoped in**, however the potential cumulative effect of both the Calderdale, Hope Moor and other smaller schemes within the M6 corridor that will collectively surround the National Park needs to be **scoped in** also, as there are potential cumulative-related impacts on breeding populations of upland birds for which the SACs within the National Park are known for.

Response to Questions within the Scoping Report: Main Text:

Q8.1: Do consultees agree that the desk study extent, survey scope and survey methods are proportionate to the likely ornithological interests relevant to the Project? If not, please specify any additional survey requirements and provide justification.

4.99 **No.** The YDNPA consider the survey scope proposed to be proportionate, although request that the recommendations made above are included/accounted for within the ecological/ornithological studies.

Q8.2: Do consultees agree with the ornithological features proposed to be scoped in to detailed assessment at this time? If not, please identify which designated sites, species or species-groups and explain the evidence basis for their inclusion.

4.100 **Yes**, the YDNPA agrees with the ornithological features proposed to be 'scoped in' (as per the contents of the Scoping Report; Main Text)

Q8.3: Do consultees agree with the ornithological features proposed to be scoped out of detailed assessment at this time, including the justification provided for designated site connectivity, migratory waterfowl and common or otherwise low-sensitivity species? If not, please identify where alternative conclusions are considered necessary and provide justification.



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4.101 **No.** Although the YDNPA is mostly in agreement, it is strongly of the opinion that the impacts of lighting (on bird, bat and invertebrate species in particular) should be appropriately addressed. In this regard, the YDNPA would expect to see a lighting impact assessment, given the National Park is a Dark Sky Reserve and there are many sensitive species that could be negatively impacted by light pollution. A suitable mitigation strategy as recommended in the 'Dark Skies' subsection above should be produced.

4.102 As artificial lighting on the proposed turbines is likely to cause a number of issues with regards to ecology (including bird species), and not just collision risk due to lit turbines, the YDNPA considers that the impacts of artificial lighting (on ecology) should not be scoped out of the ES.

Q8.4: Are consultees aware of any additional data sources, recent records, local evidence, or unpublished information that should be considered in relation to the identification or ornithological features or designated site connectivity?

4.103 The YDNPA would wish to discuss further with the applicant to identify any relevant additional sources of bird and avian species data should the impact of artificial lighting on birds populations be scoped in.

Q8.5: Do consultees have any specific expectations regarding mitigation, monitoring or habitat enhancement measures that should be considered at this stage of the EIA process for the Project?

4.104 Not at this stage, although the YDNPA would request that all *mitigation, monitoring or habitat enhancement measures* should compliment the existing area and should ensure that the YDNPA is consulted, as the National Park has its own ecological goals/objectives (as set out within the YDNP Management Plan) and it is important that these are aligned.

Q8.6: Do consultees consider that any species-specific disturbance buffers or construction controls should be anticipated beyond standard inherent mitigation measures?

4.105 The YDNPA has no comments to make at this stage.

Q8.7: Are there any specific cumulative developments or recent planning decisions that consultees consider should be incorporated within the assessment of cumulative impacts?

4.106 **Yes.** As mentioned in other subsections of this response, there is another proposed NSIP wind farm project to the south of the National Park (Calderdale



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Energy Park) The pre-submission documents for this scheme have identified a potential impact on displacing breeding upland birds to within the National Park which may in turn have an impact on the National Park's breeding population.

4.107 The YDNPA recommends that this potentially significant impact is **scoped in** and appropriately identified/assessed as well as any other cumulative effects of both wind farms schemes surrounding the National Park and how that will also impact breeding populations of upland birds for which the SACs within the National Park are known for.

4.108 Furthermore, a search for, and assessment of, the cumulative effects on ecology of the proposed development in combination with the effects of smaller scale planning applications is recommended. For instance, Arkengarthdale, Gunnerside and Reeth Moors Site of Special Scientific Interest (SSSI) involve potential works that may cumulatively impact the SSSI within the YDNP.

CHAPTER 17 (SOCIO-ECONOMICS)

Observations/Comments:

a. 'Scoping Out' Socio-Economic Impacts

4.109 The Scoping Report: Main Test (paras. 17.1.3.-17.1.5.) sets out the applicant's position vis-a-vis scoping for the ES:

"On this basis, no likely significant socio-economic effects are anticipated for the purposes of the EIA. This is because the principal socio-economic effects of the Project are expected to relate to temporary construction activity and limited operational employment, with any beneficial effects likely to be dispersed across a wider labour market and supply chain rather than of a scale or concentration likely to materially alter local socioeconomic conditions. No clear pathway has been identified by which the Project would be likely to give rise to significant adverse effects on local population, employment structure, businesses, tourism activity or community infrastructure." (17.1.3.)

"It is therefore proposed that the assessment of socio-economic impacts should be scoped out of the EIA. However, recognising that socioeconomic and tourism matters will be of interest to stakeholders and relevant planning authorities, a proportionate standalone socio-economics and tourism report will be prepared and submitted alongside the EIA documentation. This will consider matters such



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as employment generation, local expenditure, tourism, and any indirect or induced effects arising from the Project.” (17.1.4)

“This is in line with the latest Overarching National Policy Statement (NPS) for Energy (EN-1) (Ref 17-1), which states that in addition to an assessment of likely impacts: “The Secretary of State should consider any relevant positive provisions the applicant has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise.” Both these outcomes are better achieved through a standalone report than an EIA chapter.” (17.1.5)

4.110 The YDNPA **strongly disagrees** with the proposal to ‘scope out’ socio-economic impacts on the basis that it is considered that there would be ‘no likely significant socio-economic effects...anticipated’.

4.111 The YDNPA would suggest that this rationale and the conclusion that there is ‘no clear pathway...identified...to give rise to significant adverse effects on local population, employment structure, businesses, tourism activity or community infrastructure’ lacks a clear understanding of the visitor economy in and around the YDNP.

4.112 Specifically, the fact that visitors to the Yorkshire Dales National Park, know they are in a National Park, and as per the findings of the [YDNPA’s Visitor Survey 2022](#) its top three special qualities mentioned most by them are:

- natural beauty/scenery/views (78%),
- walking (31%) and
- peace and tranquillity (24%).

4.113 In 2023, there were a total of 6.67 million visitor days equating to 5 million visitors to the Yorkshire Dales National Park. These visitors contributed £485 million to the local economy within its boundary. For the wider area (this includes the National Park and settlements on its periphery such as Richmond) the corresponding figures were 14 million visitor days and £1015 million to the local economy in 2023.

4.114 It is not clear that the Scoping Report has considered existing YDNP survey data (available at www.yorkshirdales.org.uk) The National Park Authority’s data monitors trends in visitor perceptions and numbers, and the amount visitors spend. The latter is carried out using the Scarborough Tourism Economic Activity Monitor (STEAM) model.



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4.115 The questions that the socio-economic section of the ES would need to address (in the view of the YDNPA) for the Upper Dales specifically and the National Park more generally, are:

- Will the wind farm impact the National Park's special qualities?
- Will it change visitor satisfaction or experience?
- Will effects differ across visitor groups?
- Will the wind farm affect visitor numbers and/or length of stay?
- Will it affect visitor spending?
- What are the implications for local businesses and employment?

4.116 The evidence provided in the ES should be specific to the landscape, visitor profile, and scale and location of the proposed development. It should combine visitor surveys, photos, GIS mapping, tourism business interviews, and existing National Park data sets, with new primary research, relevant to the visitors and environment of the Yorkshire Dales National Park and North Pennines. This research needs to be conducted to assess the impact of the wind farm on visitors' quality of recreational experience, length of stay, satisfaction and overall spend. Specifically, the ES must assess the impact of the proposal on the visitor experience and then consider how this will impact the area's visitor economy. For example, the ES should address:

Assessment of the impact on Visitor Experience:

- Changes to landscape character and scenic quality
- Visual intrusion within key viewpoints,
- Noise perception
- Effects on tranquillity and sense of wildness
- Effects on recreation activities - walking, cycling, wildlife viewing, photography, field sports etc.
- Effects on experience of travelling through or within the National Park.

Overall change in visitor satisfaction or experience:

- Assessment of the impact on the Visitor Economy
- Changes in visitor numbers, and if effects differ across visitor groups, events and businesses
- Changes in length of stay
- Changes in spending patterns and business revenues
- Changes in employment supported by tourism.



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4.117 In addition, no reference has been found within the Scoping Report, or the Hope Moor website, to the visitor experience within the adjacent nationally protected landscapes, and an assessment of the impact the proposed wind farm will have on this.

Response to Questions within the Scoping Report: Main Text:

Q17.1: Do the consultees agree with the approach of scoping socioeconomics out of the EIA and into a standalone report to better address the socio-economics requirements of NPS (EN-1) (Ref 17-1)?

4.117 **No.** As stated in the 'Observations/Comments' section above, it is not acceptable that socio-economic aspects are scoped out of the EIA (as suggested in paragraph 17.1.4), for the reasons outlined above. The potential effect of the proposal on socio-economics is likely to be complex, diverse and far-reaching and is closely linked to the environmental effects of the proposal that are addressed by the EIA. Understanding the effect requires a robust approach to assessment and not a standalone report.

4.118 The approach in paragraph 17.1.4 of the Scoping Report: Main Text because assumes incorrectly (in the view of the YDNPA) that the wind farm will have no direct effect on the Upper Dales specifically, and the Yorkshire Dales National Park more widely. The scoping document only looks at the construction supply chain, and 15 km from the proposed site, and not the effect on the tourism economy as a whole.

4.119 Large wind farms affect both the perceived tranquillity of an area and the visitor economy –these effects vary depending on the landscape, the type of tourism, and importantly whether other man-made detractors are in the landscape, as shown by research undertaken by Northumbria University on behalf of CPRE (2004, 2008) and available at www.cpre.org.uk/resources/mapping-tranquility/. CPRE tranquillity maps show the Yorkshire Dales National Park to be one of the few remaining truly tranquil areas left in England (along with the North Pennines). YDNPA Visitor surveys undertaken over the past 20 years, show visitors come to the Yorkshire Dales National Park specifically because of its scenery, walking, and tranquil environment. Many visitors (61% based on YDNPA's visitor survey, 2022) undertake a walk of an hour or more during their visit.

4.120 The suggestion that such a large wind farm, in close proximity to the YDNP, has no likely significant socio-economic effects on tourism in the area (i.e. on the number of repeat visits or length of stay in Swaledale, Arkengarthdale and Wensleydale), is unsubstantiated. It takes no account of the fact that the windfarm will be in close proximity and visible within a 30 minute walk from Reeth (e.g. the



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popular Fremington Edge) and clearly visible when visitors drive into the area over the moorland to its north, south or east, from Richmond, Leyburn, Redmire, and Askrigg, for example. The wind turbines will alter the National Park landscape that visitors value for its natural and undeveloped character, particularly around Reeth and the Upper Dales. The rotating blades will attract attention and will reduce the experience of wildness and remoteness.

4.121 All tourism assets (recreation including field sports, walking and cycling routes, hospitality, accommodation, shops, events and attractions) in the whole of the Upper Dales administrative area need to be assessed and not just within 15 km of the project as stated in 17.2.5.

‘Tourism assets with the potential to experience significant residual environmental effects are expected to be located within 15 km of the Project’.

4.122 It's unclear how the data sources shown in Table 17.1 are relevant to this socio-economic assessment, particularly ONS data relating to Scotland, Wales and Northern Ireland. Table 17.1 needs to include tourism data sources held by the Yorkshire Dales National Park Authority on its website www.yorkshiredales.org.uk including:

- Yorkshire Dales National Park Visitor Survey 2022,
- Yorkshire Dales National Park Visitor Honeypot Survey 2022,
- Monitoring of trends in visitor numbers and the amount they spend using the Scarborough Tourism Economic Activity Monitor (STEAM) model.
- census data for Yorkshire Dales National Park 2021

4.123 Paragraph 17.4.6, relevant policy, needs to include policy and consultation documents specific to the National Park and the Upper Dales, including:

- Yorkshire Dales Local Plan
- Yorkshire Dales National Park Management Plan
- Yorkshire Dales National Park Special Qualities Special Experiences, 2019
- A Strategy and Action Plan for Sustainable Tourism Strategy in the Yorkshire Dales (2013-2018) written for the Europrac Charter on sustainable tourism 2014

Q17.2: Do the consultees agree that the scope of the proposed socio-economic report is appropriate?



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4.124 **No.** The YDNPA strongly disagrees as it considers that the underlying assumption is incorrect, for the reasons outlined earlier. No consideration has been given in the scoping report to the effect of the visibility of the turbine on the visitor experience, particularly the loss of tranquillity and how this will affect the National Park economy.

4.125 Regard should be had (in any assessment of the socio-economic impacts of the proposed development on the YDNP) to the aforementioned surveys and sources of data that is available on the website of the YDNPA. The businesses of Swaledale, Arkengathdale, and Wensleydale depend on visitors who visit the National Park for outdoor activities because of its scenery, wildness and tranquillity. The wind farm is likely to reduce visitor numbers, and/or shorten stays, which in turn will lower visitor spending on accommodation, food, and recreation, and thereby harm the many businesses and employment dependent on tourism. It will also damage the viability of festivals and events that depend on the unique character of the area including.

- Swaledale Festival
- Ardrock Mountain Bike festival
- Dark Skies festival

4.126 The Dark Skies festival is particularly important as it helps businesses by boosting the visitor spend in the winter months, outside of the main tourist season.

Q17.3: Are there specific socio-economic effects that should be considered in the standalone report?

4.127 **Yes.** Without prejudice to the YDNPA's stated position that socio-economic impacts should be 'scoped in', if it is decided that socio-economic impacts should be considered a part of a 'standalone' report as suggested in the Scoping Report, YDNPA consider that the following matters/questions should be assessed:

- Will the windfarm impact the National Park's Special Qualities?
- Will it change visitor satisfaction or experience?
- Will effects differ across visitor groups?
- Will the wind farm affect visitor numbers and/or length of stay?
- Will it affect visitor spending?
- What are the implications for local businesses and employment?

4.128 The National Park economy depends heavily on walking and visitors perceptions of unspoilt scenery. The wind farm will be highly visible from popular and much valued viewpoints and summits, and when travelling around the area, particularly on the roads between Swaledale, Wensleydale and Arkengarthdale.

4.129 The multiple times, during a visit, that visitors will see the wind farm, will have a cumulative visual effect. Perceptions matter: if visitors believe the landscape has become less tranquil, satisfaction will decline even if actual visitor numbers remain stable. This will lead to shorter stays, which in turn will lower visitor spending on accommodation, food, and recreation, and thereby harm the many businesses dependent on tourism in and around the Yorkshire Dales National Park.

5.0 Conclusion

5.1 The YDNPA would respectfully request to the views and recommendations expressed regarding the Scoping Report are considered by the Planning Inspector with regards to their Scoping Report.

END