

Hope Moor Wind Farm

Scoping Response, North Pennines National Landscape partnership

These comments are sent on behalf of the North Pennines National Landscape partnership via the staff team based in Weardale, County Durham.

Introduction

Staff from the National Landscape team, Yorkshire Dales National Park Authority, Durham County Council and North Yorkshire Council have begun a positive dialogue with the Fred Olsen staff responsible for this development proposal. It is our collective intention that this engagement continues as this application progresses, as it will avoid duplication and promote learning.

In that context we have studied the input from colleagues at these organisations with regard to this scoping stage of the work, and we fully endorse the comments made to date.

LVIA – defining the study area

There is a difference presented between the study area for assessing impacts on landscape character (20km) and a ‘wider study area’ (45km).

We concur with colleagues at DCC that the 20km focus on landscape character effects is not appropriate in this context. The scale and location of the proposal is such that proposed turbines would be significant visible features in views from substantial areas of high moorland ridges and summits of parts of the North Pennines NL up to at least 40km distant from the site. to around 30km.

The character of these open landscapes is such that they are highly susceptible to impacts from vertical structures breaking the skyline and the scale of the turbines proposed only adds to this issue.

The North Pennines National Landscape Management Plan

Our colleagues have highlighted a number of additional information sources that will inform your understanding of the potential impacts of this proposal. We would endorse all these suggestions and draw your particular attention into our context to the new statutory North Pennines National Landscape Management Plan 2026-2031. This plan is going through the process of adoption by local authorities, for which it formulate their policy in relation to the National Landscape.

Included in this plan are the North Pennines Planning and Design Guide, an updated landscape character assessment and a clear articulation of the special qualities of the landscape which the designation seeks to conserve and enhance. The team will be supplying Fred Olsen staff with the final version of the full plan during July 2026. In the meantime, an appendix to this document sets out the special qualities of the National Landscape in detail.

Assessment Methodology – visibility beyond 20km

Section 5.6.3 of the scoping report again refers to visibility beyond 20km being limited to patches on elevated hill tops. This is not appropriate given the large tracts of open moorland likely to be substantially affected by this proposal. Much of this is open access land, whilst it is also access in places by the extensive rights of way network and from rural roads. As

colleagues have highlighted, these are the places where key special qualities of remoteness, wildness and tranquillity can be best experienced.

Visual Receptors and Preliminary Representative Viewpoints

The approach to identifying principal visual receptors is inadequate. It is essential to include a wide range of principal receptors from open access land and the rights of way network, and not simply focus on places where one might easily drive. The current approach undervalues the importance of these areas from a perspective of those seeking to experience many of the area's special qualities to greatest effect. Key landmark features in these locations are arguably even more important than the easily accessible laybys and similar places chosen thus far.

Colleagues have raised the issue of the use of photomontages at a distance of more than 20km, given the height of the turbines proposed. We concur with their view without the need for further elaboration.

The viewpoints list as presented is inadequate. We note the list of further viewpoints provided by DCC and we aim to work with the Fred Olsen team and colleagues to define a much broader and more representative set of viewpoints than those offered in the scoping document.

Landscape Character

Colleagues have made you aware of the differing typologies used in assessing landscapes in/by neighbouring authorities. It will be important to choose these carefully to avoid inconsistency and to adequately assess effects on landscape character, and this will need further engagement with local authorities and the protected landscape teams, as a group.

In the meantime, we concur with colleagues that the Landscape Character Areas (LCAS) identified in the scoping report are not appropriate, as they do not go into a fine enough grain of typology and are not consistent.

Aviation Lighting

The North Pennines is the darkest mainland National Landscape, and dark night skies are one of the area's special qualities. Unlike the Yorkshire Dales National Park, International Dark Sky designation has not yet been pursued for the North Pennines, but this reflects relative capacity rather than any lesser quality of experience in the latter location. Dark Sky tourism has become an important component of the North Pennines' shoulder and off-seasons.

The scale of this proposal indicates that it is one for which a larger study area is appropriate, in line with the NatureScot guidance on this matter. When considering viewpoints in relation to aviation lighting and dark skies, the NPNL team will prove a shapefile of the area's UK-level designated Dark Skies Discovery Sites.

We believe that a full lighting management plan is required for this development, for the potential impact on dark skies, including understanding and addressing the impact on biodiversity from any lighting.

Under-estimated potential cumulative effects

The report says that cumulative effects would be 'minimal at worst'. This completely ignores the cumulative impact of wind farms along the A68 corridor (visible from the Hope Moor site in clear conditions), the impact of which reaches deep into the National Landscape in some places. The additional impact of the proposed development would make it, and the current wind farms, both visible from some key locations, clearly adding to the erosion of the special quality of relative remoteness, wildness and tranquillity in those places. There needs to be deeper engagement on this, as the issues are not currently adequately considered.

Grid Connection

The material published thus far specifically states that there are no clear plans for how the electricity generated would be transferred to the Grid. There would be a likely significant local impact in this and to not present plans for it as part of the scoping opinion means that the developer is asking for comment on what amounts to only part of the scheme. This is very likely to add to the negative landscape impact of the proposal. We look forward to working with the developer to understand plans for transferring to the grid the electricity generated here, at the earliest opportunity.

Roads and tracks for construction and operation

Whilst we appreciate that the precise turbine location makes the internal road system hard to present at this time, the scoping report pushes into the future any detail about vehicular access to the site, and makes assessment of impacts problematic.

On-site, the report talks about 'tracks' - please refer to these structures as roads, rather than tracks - it is disingenuous to do otherwise.

Such roads are presented as being 6m wide, with passing places, between turbines, to borrow pits, substations, and other on-site infrastructure. Considering the impact of similar-sized development in open moorland elsewhere, we can expect between 22km and 28km of internal roads. Whilst we know the precise figure cannot be given, it is important that a realistic figure be provided early in the next phase including: total permanent track length, length of floating roads over peat, length of cut-and-fill roads and total area of permanent hardstanding. Only then will you be able to understand long-term impacts on landscape, hydrology and habitats associated with the internal road layout. *Whilst we acknowledge that this information is not available in detail at this stage*, it is essential that the developer prioritises this in the next phase, as an understanding of this impact is essential for understanding the overall impacts that need addressing.

Similarly, the report is silent on the haul road route and the route that turbine delivery vehicles will take from the strategic road network. There is no estimate of HGV movements / abnormal load deliveries, or an understanding of the impacts on settlements. The access / new road issues alone will generate a hugely significant local impact and, like the onsite road issues, we *urge the developer to prioritise the definition of these proposals to allow good early understanding of complete impacts.*

The lack of information about both grid connection and internal/connecting road issues is akin to asking someone to house a dangerous animal without explaining the cage in which it will be kept; how can the full consequences be understood? This must be resolved as a matter of urgency.

Ecology and Biodiversity

Peatland in the study area is functionally linked to that in the surrounding landscape. Changes in hydrological function in one part of a wider peat body can readily impact on other parts of it beyond a particular 'site.' Understanding where these effects might lie, and scoping-in these areas for the ES will ensure that true impacts can be assessed.

In relation to species, we would like to emphasise the following:

Given the habitat types involved we would fully expect to see surveys for reptiles and amphibians, which are very likely to be under-recorded here and likely to be significantly adversely affected by the construction work and loss of habitat.

We would expect a detailed professional invertebrate survey to be completed for the site, in the appropriate season (which would include spring of 2027 as well as what remains of the current summer recording season)

To better understand potential impacts, we would expect the next phase of work to identify:

- hectares of each habitat to be lost,
- kilometres of access track through priority habitat,
- hectares of blanket bog affected (this is not simply a matter of looking at the area of peat directly lost, but on hydrological and other impacts of fragmentation of the habitat)
- Biodiversity Metric calculations,
- predicted BNG units gained or lost,
- collision-risk modelling results,
- significance assessments for each key species considered,
- mitigation plans in detail.

We note the applicant's intentions to restore habitats that are damaged as part of the construction process. However, in relation to peatland, this will only be compensatory work – you will not be able to replace peatland 'lost' to the construction process or in the final realisation of the proposals. The loss of peatland and its carbon storage and sequestration capacity needs to be part of the carbon cost / benefit analysis of the scheme. Should the project go ahead, we ask that you engage with the North Pennines National Landscape team and the Yorkshire Peat Partnership, as both parties have over 20 years' experience of peatland restoration.

Archaeology

We concur with the observations made by Yorkshire Dales National Park Authority and would expect the approach they advocate for the National Park being applied to the North Pennines National Landscape.

Though the methodology proposed for approaching archaeology appears to follow current established practice, it is comprehensive but generic. It proposes a significant amount of investigation in a short time and we question how deliverable this is, and therefore how successfully the potential impacts can be addressed.

Beyond the development itself, we *disagree* that field investigations (walkover survey, geophysical survey where appropriate, and any targeted trial investigations) should be focused solely on the development site itself. There is likely to be a range of as-yet-undiscovered features in this historically rich landscape that would be culturally functionally connected to those on the site itself.

For many prehistoric features, their significance derives in part from long-distance intervisibility, the relationships between them and their association with an open, largely undeveloped upland landscape. For a project adjacent to the North Pennines National Landscape, one of the key questions will not simply be whether archaeology survives **within** the site, but whether there are potentially historical related sites and features in the wider landscape, *and* how the development might impact upon the integrity of archaeological landscapes **outside** it.

So, for physical remains and features, the ES must look beyond the site itself at what may be found in the area (extent to be determined), and it must also look at the impact on archaeological landscapes and the wider setting of heritage assets.

We would look to engage with the team via archaeologists in our partner organisations who can provide more detail than us on likely impacts and specific areas to consider.

Socio-economic issues

The applicant has no reasonable ground for scoping out socio-economic impacts beyond the construction phase of this proposed development, and we strongly disagree with this approach.

We strongly support the following reference from the scoping opinion provided by colleagues at the Yorkshire Dales National Park Authority (shown in full for clarity, with our edits to expand the reference to the National Landscape) in relation to what the ES should cover - note that it would be wholly inappropriate to treat the National Park differently from the National Landscape, given the proximity, same landscape quality and recreational experiences there):

“The questions that the socio-economic section of the ES would need to address...are:

- Will the wind farm impact the National Park’s and National Landscape’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?

The evidence provided in the EIA 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 EIA 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 EIA 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 and National Landscape.

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.

It is, in our view, wholly inappropriate that the above should not be carried out as an integral part of understanding the likely impacts of this proposal.

Appendix - The special qualities which combine to create the natural beauty of the North Pennines

Diverse and distinctive upland landscape character

The National Landscape covers much of the North Pennines National Character Area (NCA 10) and encompasses a suite of upland landscapes which a strong and distinctive character. Variations in geology and soils, landform, land use and vegetation, field boundaries, settlement patterns and building styles within the National Landscape give rise to a range of different but closely related landscapes, each with its own distinctive character and unique sense of place. More information on the key components of character that contribute to the natural beauty of the National Landscape can be found in the Landscape Character section of the Management Plan.

A unique geology recognised in international designation as a UNESCO Global Geopark

Much of the North Pennines is made up of the 'Alston Block': the fault-bounded structural unit of alternating strata of sedimentary rocks, limestones, sandstones, and shales uplifted by the 'Weardale Granite,' which give a strong linear grain, a massive scale, and a stepped form to the topography. The rocks are heavily faulted, with mineral rich veins and igneous intrusions of the Whin Sill which outcrop in striking crags and waterfalls. Higher ground is free of drift with prominent crags, stone bands and occasional limestone pavements. Older igneous rocks form distinctive pikes along the western scarp. The geology of the National Landscape is remarkable for both its intrinsic value and scientific interest, its fundamental influence on landscape character and biodiversity, and the way it has influenced, and been exploited by, generations of farmers, miners, quarrymen, builders and engineers.

A nationally and internationally important assemblage of species and habitats

The North Pennines is notable for its wildlife. At nearly 2000 square kilometres it is England's second largest National Landscape and around 36% of it is designated as Sites of Special Scientific Interest. It contains 40% of the UK's species-rich upland hay meadows, 30% of its upland heathland and 27% of its blanket bog. It contains unique arctic alpine flora, including the rare Teesdale (Spring) Gentian, and calaminarian grasslands associated with old lead mine workings. It is of particular importance for breeding upland wading birds including golden plover, redshank, curlew, lapwing, and snipe, for both red and black grouse (with over 80% of the English population of the latter) and for species such as short-eared owl, peregrine, merlin and ring ouzel. The area's rivers are important spawning grounds for migratory salmon and brown trout and support otter and white-clawed crayfish. Its woodlands include ancient upland oak, ash and juniper woods and it has many ancient, veteran and notable trees. The North Pennines still supports populations of red squirrel. This rich biodiversity is a cornerstone of the natural beauty of the North Pennines.

Nationally important peatlands

There are around 900 square kilometres of peat in the North Pennines, a substantial proportion of England's peatland, and most of this is blanket bog, a unique habitat found only in cool, wet regions of the world. These peatlands are an important store of carbon and an internationally designated habitat for wildlife. They play an important role in maintaining

drinking water quality and reducing downstream flood risk. They contain a record of the historic environment since the last ice age and support local employment associated with farming, grouse moor management, tourism and conservation.

A strong sense of wildness, naturalness, remoteness and tranquillity.

Due to the combination of elevation and an austere climate of short summers, long winters and high rainfall, much of the higher ground of the North Pennines is beyond the limits of settlement and agriculture. This brings a powerful sense of remoteness and isolation to many areas. The strength of its topography, its expansive skies and extremes of weather, the natural character of its fast-flowing becks and rivers and the prevalence of natural and semi-natural habitats, coupled with the typical absence of man-made structures give the landscape a wild and natural quality in places. While nowhere in England is truly wild or natural, few places exhibit those qualities more strongly than the North Pennines. The sights and sounds of nature, extensive views and the low levels of human activity, artificial noise, movement and light make this a very tranquil place.

Unrivalled dark skies

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 National Landscape have been designated as Dark Sky Discovery Sites, more than anywhere else in the UK. Dark sky tourism has an increasingly important impact on the off-season economy of the area.

Outstanding scenic beauty

The North Pennines is a landscape of great and varied scenic beauty. Its rolling topography of high ridges and summits and steep-sided valleys create many opportunities for rewarding views. On the higher ground deep panoramas take in successive ridges with clean sweeping skylines and expansive skies, punctuated in places by distinctive summits and crags, with few man-made features. In some views from the moors, distant ridges frame the farmed and settled landscapes of the dales. Within the dales a number of factors contribute to their scenic quality including the simplicity, coherence and harmony of their pastoral farmland, the pattern and rhythm of drystone walls and hedges, the subtle colours of flower rich hay meadows, the variety of tree cover, the uniformity of natural building and walling materials and the general absence of discordant or incongruous elements. There are many individually notable views of dramatic or picturesque features such as crags, gorges and waterfalls.

Commanding views out from high ground on the edges of the National Landscape take in neighbouring landscapes. In some cases, the boundary of the National Landscape isn't strongly evident, and adjoining landscapes are 'borrowed' as part of the view. The lower and middle dales outside of the National Landscape are an important component of many views across and from it. There are also notable views of the National Landscape from neighbouring landscapes, particularly from the west, where its imposing topography and simple landcover are important elements of the visual environment.

A rich cultural heritage

From the hunters and gatherers of prehistory to the miner-farmers of the 19th century, successive communities have left their mark on the historic environment of the North

Pennines. The absence of extensive development or intensive agricultural improvement in later periods has left a landscape of considerable 'time-depth' and a rich cultural heritage. Prehistoric settlements, stone circles, burial mounds and cultivation terraces and medieval farms, chapels, deer parks and defensive bastle houses, sit alongside later farmsteads and fields systems, and relics of lead and fluorspar mining and quarrying. The vernacular character of buildings and structures and the widespread use of local stone and local detailing bring a degree of unity and harmony to the character to its settlements. Within the National Landscape today there are 16 Conservation Area, 183 Scheduled Monuments and 968 Listed Buildings of which 15 are Grade I and 36 are Grade II*. Many more sites and features of archaeological and historic interest are recorded on the Historic Environment Records held by local authorities.

A long and distinctive farming heritage

A long tradition of upland livestock farming has shaped a distinctive landscape of enclosed pastures and flower-rich hay meadows within the dales, with strong field patterns defined largely by dry stone walls, with scattered farmsteads and isolated field barns. The small scale of traditional farm buildings, their simple form and vernacular detailing, together with the widespread use of local stone for both buildings and field walls creates a strong sense of unity and visual harmony to the countryside. In Teesdale, the white painted farms of the Raby Estate have a locally distinctive character.

The improved and semi-improved pastures of the dales and the rougher grazing of the moors support hardy upland breeds of sheep and cattle. Notable local breeds include Swaledale and Teeswater sheep, Masham and North of England Mule crosses, and the Blue Grey and Northern Dairy Shorthorn cattle. Isolated sheep folds, bields and stone bothies are distinctive features of the moors. Traditional farming, moorland and land management practices continue to make an important contribution to the character, biodiversity, cultural heritage, and natural beauty of the North Pennines.

A unique mining heritage

The North Pennines is world-famous for its remarkable mineral veins and deposits, known collectively as the Northern Pennine Orefield. Mining for these minerals – particularly lead but also sphalerite (zinc ore), iron ores, fluorite (fluorspar), and barium minerals such as baryte and witherite - has had a profound effect on the landscape and cultural heritage of the area. The remains of mine and processing works – including buildings, hushes, spoil heaps, shafts and levels, washing floors, reservoirs, water leats, smelter flues and chimneys – are widespread and make a significant contribution to the character and identity of the National Landscape. The industry contributed to the area's distinctive settlement pattern of scattered hamlets, wayside clusters of houses and the isolated smallholdings of 'miner-farmers' on the higher dale side. The long tradition of quarrying sandstone, whinstone and limestone has also left its legacy in both the landscape and the buildings and drystone walls of the area.

Exceptional access to nature

The North Pennines is a highly accessible landscape which provides exceptional opportunities for residents and visitors to experience and enjoy its natural beauty. A substantial proportion of the National Landscape is designated as open access land under the Countryside and Rights of Way Act 2000 (CROW Act) which gives the public a right of access

to land mapped as open country (mountains, moor, heath or down) or registered common land.

The dales and parts of the moorland are well-served by networks of Public Rights of Way, including a number of nationally and regionally promoted long-distance routes such as the Pennine Way National Trail, the Coast-to-Coast National Trail, Wainwright's Pennine Journey Weardale Way, Teesdale Way and the Roof of England Walk. Quiet country roads and tracks provide opportunities for walking, cycling, horse riding and recreational driving, with some routes forming part of the National Cycle Network.