Slow The Flow

Comment Date: Wed 18 Oct 2023

Ask:
We understand that Slow the Flow have been asked to review and provide an opinion on the
current application/scoping report with reference to the proposed methodology relevant to our
organisations' interests.
Slow the Flow:
Slow The Flow (STF) is a charity working to advance the education of the public in Natural Flood
Management (NFM), Sustainable Drainage Systems (SuDS) and other renewable methods of
managing the environment, including the exploration of alternative practices which safeguard
the natural environment and its resources in a manner which best fits the specifics of a local
geography.
As a natural flood management charity, we will have most interest in the aspects of the
report/subsequent application which will have direct or indirect impacts on hydrology/
drainage, flood risk and any associated mitigation proposals.
STF is aware that this is a complex application with many and varied issues - we have considered
only Section 9: Geology Peat Hydrology and Hydrogeology and answered questions 23 and 24.
We have also made some observations on impacts and mitigation.
Question 23: Do consultees agree with the topics included under the Proposed Scope of the
Assessment?
Question 24: Do consultees agree with the assessment methodology?
STF has several position statements covering the range of our work the most relevant of which
for the application will be our Upland Position Statement.
https://slowtheflow.net/uplands-position-statement/
STF Upland Position Statement
Upland management: Making space for water.
The uplands of our catchment have a significant role to play in slowing the flow of floodwater.
-Blanket bog restoration is believed to be the best possible outcome.
- Slow The Flow joins other conservation organisations in demanding the cessation of burning on blanket bog. We consider that cutting with scythes is a viable alternative, where heather regeneration is considered necessary.
- Slow The Flow will object to the creation of new tracks on blanket bog.
- The adverse effects of existing tracks could be mitigated through retrofitting permeability into their construction make-up, and/or using offline attenuation

basins.
- Woodland creation is unlikely to be an appropriate response in our upper catchment, due to its unique ecology.
Question 23: Do consultees agree with the topics included under the Proposed Scope of the
Assessment?
9.6 Proposed scope of at the assessment:
We agree that hydrology, geology, and hydrogeology are essential topics to be scoped into the
EIA features of the report and would stress that the factors identified in 9.6 Scope of the
Assessment need to be included in a holistic assessment covering the application area and
downstream catchment resources. (As per 9.5 study Area)
Section 9 We note that:
- As part of the EIA, a Hydrological, Geological and Hydrogeological Impact Assessment will be undertaken on those receptors that are likely to experience a significant impact from the construction, operation, and decommissioning of the Proposed Development. Where any likely non-significant impacts are identified in this section, Natural Power proposes that these are not carried forward for inclusion in the relevant EIA and are 'scoped out'.
How would 'non-significant' impacts be determined?
9.5 Study Area:
- The hydrological study area for the ES will be larger in extent than the actual site and includes the lower reaches of identified catchments. Designated sites, private water supplies and other relevant developments would also consider from the perspective of assessing any potential hydrological linkages or cumulative effects. Details/locations of sites and parameters to be measured would be welcomed either at this
stage or in any subsequent planning application.
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- A qualitative flood risk assessment for the proposed development and hydrologically connected areas downstream will be carried out as part of the EIA.
What would the methodology be for a qualitative assessment?
Question 24: Do consultees agree with the assessment methodology?
9.7 Assessment Methodology:
- We are in general agreement with the proposed methodology but note that Table 9.2 Sensitivity and 9.3 Magnitude, only form part of a recommended methodological approach to wind farm developments on peatlands https://publications.naturalengland.org.uk/publication/43010 (4.4.5) which has additional parameters: the likelihood of the impact occurring and comparing the impacts with any changes that might occur without the development
- With reference to the above it would appear necessary to determine how the proposed future use and management of the site as a wind farm would affect the hydrological properties of the moor as opposed to a continued management as a grouse moor which is subject to a protected site conservation management plan. (Walshaw Moor Catchment Restoration Plan
https://publications.naturalengland.org.uk/publication/6389907001442304)

We would like to see modelling/assessments of the relative outcomes for different future management option as they affect water retention in the area and impacts on drainage basin dynamics downstream.
- Is it proposed to carry-out more detailed peat depth assessment to inform the current 'Interpolated peat depth' modelling included with the assessment?
9.8 Proposed Mitigation
50-meter buffer:
- A 50-meter buffer has been implemented for all identified natural hydrological features. Infrastructure will be located outside this buffer except where access necessitates. We would consider that the whole peatland is an integratedhydrological feature and that the current location plan for turbine includes some
individual units being located on steeper slopes above surface watercourses.
9.8 Welfare facilities/mitigations:
- We note the reference to SEPA - not applicable in England?
Natural Flood Management.
- We note at this stage that there is no mention of natural flood management measures
which have the potential to act as mitigation for hydrological retention and outputs from
the site and are already in use within the application area and wider catchment.
- Tree planting: Planting can be valuable part of natural flood management but STF's position re tree on moorland is:
Woodland creation is unlikely to be an appropriate response in our upper catchment, due to its unique ecology.
9.9 Potential Impacts
Track construction: A development of this size would imply:
- A network of construction routes that will be required to accommodate heavy vehicles
involved in the construction phase.
- A subsequent service network of tracks and spurs for the turbines.
- Potentially an access road to the site if the existing roads are unsuitable for heavy traffic.
- We are aware that such track construction on moorland may have significant impacts on
the surface and subsurface and associated impacts on the future hydrological performance of the peatland area and that this should be an essential focus of the methodology and impact assessment.
Foundation size:
- Depending on the design and associated construction, and the number of turbines proposed, we are aware that cumulative foundation depth and extent may have significant impacts on the water storage capacity of the peatland and the movement of water throughout the application area.
- A holistic assessment of the impacts of all potential mitigation measures would be needed to verify the overall impact of the development.