



FAO Planning Department
Staffordshire Moorlands District Council

24th March 2025

Our Ref: Swancott/Garstones/WT/DC

Dear Sirs,

Proposed Enercon E82 (3MW) replacement Wind Turbine to be installed at Garstones Farm

Request for Screening Opinion under section 5(2) of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (as amended).

1. INTRODUCTION

We ask on behalf of our client, **Alan Swancott**, in accordance with Regulation 5 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 (as amended) (hereon in referred to as 'the EIA regulations'), to seek clarification from the Local Planning Authority about whether an Environmental Impact Assessment will be required in respect of this proposal, to install an Enercon E82 (3MW) wind turbine at the above location to replace the existing Endurance E-3120 wind turbine.

Under Part II, Clause 5 of the EIA regulations, please treat this letter as a formal request for a "Screening Opinion". We believe that it would be useful to establish at this stage that the height of the development does qualify under Schedule 2, Section 3 (i) (2) as EIA development. However, in pursuance of Regulation 5, Schedule 3 of the EIA regulations no elements of the development would have significant effects on the environment by virtue of factors such as its nature, size or location that would give cause for an Environmental Impact Assessment being required.

The information detailed in this letter has been written in accordance with Annex C of Circular 02/99 and Schedule 4 of the EIA regulations.

To aid your assessment of the proposal, we enclose a location plan which identifies the land in question. We also enclose an elevation drawing which illustrates the design and scale of the proposed Enercon wind turbine.

2. THE PROPOSAL

The proposal is to “re-power” the existing wind turbine site by installing a single Enercon E-82-E4 3MW wind turbine on the land at Garstones Farm. The turbine will replace the existing Endurance E-3120 wind turbine already supplies sustainable renewable electricity to the Farmhouse and outbuildings, with any excess exported to the National Grid to contribute to the mix of renewable electricity in the local supply. The proposed development is centred on the desire to continue to move towards a sustainable energy source which makes a valid environmental, economic and social contribution to the rural environment of Staffordshire. The main reasons for this proposal are as follows:

- 1) **Rising cost of electricity** in the UK which should be decoupled from the price volatility of gas
- 2) Reduce dependency on imported **fossil fuels**
- 3) Reduce **Carbon Footprint** associated with burning fossil fuels
- 4) Increased awareness of **climate change** and the needed response to this matter
- 5) Contribution to regional and national targets for renewable energy generation, towards net zero

2.1 LOCATION

The replacement wind turbine will be located to the west of the farmhouse; grid reference: **SK 0293 5458**. The site is located to the South of Blakelow road at a ground level of 355m AOD.

Please see attached the Location Plan which shows the proposed turbine position in relation to the existing farmhouse and the surrounding properties.

The chosen site has the following benefits:

- Average wind speed of **8.3 m/s** at 45m above ground level (NOABL Wind Speed Database).
- Existing turbine that has been on site for more than 10 years
- Distance from neighbouring properties not related to the project.
- Distance from Statutory Designations
- Distance from any potential species habitats
- Simple access and cabling routes to and from the wind turbine.
- Familiarity with existing turbine on the site.

2.2 CONSTRUCTION

Please see attached the Location Plan which identifies the site.

The ground works are undertaken in two stages. The foundations will be excavated and concrete

poured with reinforcement and securing bolts set into the concrete. The foundations will be left for approximately four to six weeks in order for the concrete to cure. The turbine will be delivered on a standard 40 tonne lorry and installed using mobile cranes.

All work will be carried out in accordance with current British/European construction standards including health and safety.

3. MATTERS MATERIAL TO THE DETERMINATION OF THE SCREENING OPINION

It is our view that the proposal does not require an EIA for the following reasons:

1. The development does not give rise to environmental issues.
2. The proposal is not located within an environmentally sensitive area such as an SSSI or AONB and is well separated from any such sites.
3. The proposal will have no significant impact on any habitats of value, biodiversity or ecology.
4. The site locality is already established as suitable for wind energy by the existing turbines.
5. There is no impact on highways.
6. There will be no impacts relating to the risk of flooding.
7. The proposal is located in accordance with the ETSU-R-97, WHO Guidelines and BS8233 and BS 4142 Regulations.
8. The proposal will cause little visual impact on local residents and the surrounding landscape due to familiarity with the existing turbines in the area.

Taking into account Schedule 3 of the EIA regulations, it is clear that the proposal does not require an EIA taking into account the following observations.

3.1 Characteristic of the Development

Scale and Appearance of the Development

The proposal is to install a single Enercon E-82 3MW wind turbine on the land to the west of Garstones Farm to replace the existing Endurance E-3120 wind turbine on the site.

Scale Parameter	Scale
Hub Height	78m
Total Height to tip	119m
Number of Blades	3
Rotational Axis	Horizontal
Rotor Diameter	82m

Please see the elevation drawings included with this letter.

Natural Resources

The purpose of the development is to use the natural resource – wind, to generate renewable electricity which can be used at Garstones Farm and at times when the electric demand on site is low, any excess will be exported to the National Grid.

The development is Carbon Neutral, and will help reduce the Carbon Footprint of Garstones Farm. In this location there is no mains gas available and the renewable electricity generated provides all the heating and hot water needs.

Waste Production and Pollution

There is no known waste or pollution generated from the operation or installation of a wind turbine.

The wind turbine foundation soil displacement will be levelled within the field boundary and cultivated as part of the field.

The existing Endurance wind turbine will be dismantled and removed from site completely, the spare parts being used to repair other turbines of the same model that are installed all across the UK (approx. 800+) any metal parts remaining have a scrap recycling value.

Nuisances

Noise

The noise level of the proposed Enercon turbine is lower than that of the existing Endurance wind turbine on the site, as it has no gearbox. Therefore noise is not an issue for this development.

Shadow Flicker

The nearest residential properties are far enough away from the replacement turbine to be unaffected by shadow flicker.

Flood Risk

A desk top analysis has been completed based upon Environment Agency data to ensure that the proposal is not located within a flood plain, or within an area that is at risk of flooding. There is no concern of flood risk for this development.

Socio – Economic

The proposal will create beneficial impacts in terms of energy independence, and a reduction of

greenhouse gas emissions. The new turbine will generate 60 times more electricity annually than the existing one, with a similar impact in the landscape.

Cultural Heritage

The site does not contain any significant built heritage. There are no statutory heritage sites in proximity to the proposal site. Therefore it is not anticipated that there would be any impact on Cultural Heritage.

Ecology

The construction of a single Enercon 3MW wind turbine would have little impact on biodiversity or wildlife. The turbine is at a height that wildlife on the ground will not be affected. Taking into account bats and birds, the turbine will be placed at a distance from hedges or trees that is greater than that recommended by Natural England (TIN051), meaning that the turbine will have no impact on bats and birds. Familiarity with the existing turbine on the site that is to be replaced, and the fact that it has been in place on the site for more than 10 years without any negative effects, all support the fact that a wind turbine here has no impact whatsoever on wildlife.

3.2 Location of the Development

The land is currently farmed, as well as having an existing wind turbine installed. The applicant owns and occupies the land under and surrounding the proposed turbine, as shown on the Location Plan.

The proposal will not adversely affect, and is compatible with, surrounding land uses. The site is not located within an environmentally sensitive location as defined by Annex B of Circular 02/99, or Schedule 3, section 2, part c of the EIA regulations.

There are no areas on or around the location which contain important, high quality or scarce resources which could be affected by the development.

The area has the ability to absorb the proposal within the landscape as evidenced by the granting of permission for the existing turbine and these nearby, as well as the undulating landscape considerably reducing the visual impact in the wider area.

The Duration, and Reversibility of the Impact

One of the main benefits of wind turbines as a form of renewable energy is that they have little environmental impact. They are not a permanent structure in the same sense as a building for example. Once the turbine ceases to produce electricity it can be removed and the land can easily be returned to its former condition. This is further evidenced by that fact that the existing turbine is now proposed

for removal, to be replaced for this more efficient model. In the future, when the new turbine ceases to be economical to keep operating, it can be removed completely from the site.

4. CONCLUSION

Taking into account the above, we would be grateful for the Council's formal consideration of whether an EIA is required in respect of this development proposal. Please note that this letter should set out the reasons for the screening opinion adopted and be placed on the public register.

I look forward to hearing from you. In the meantime, if you have any queries, please do not hesitate to contact me on the number shown below.

Yours sincerely,

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