

08/04/2025

Mr. Jose Manuel Fernandez
Planning Development Manager
OPDE UK Ltd
Cardenal
Marcelo
Spinola 42
28016
Madrid
Spain

jmfernandez@opdenenergy.com

Dear Sir

TOWN AND COUNTRY PLANNING ACT 1990

**Town and Country Planning (Environmental Impact Assessment) Regulations
2017 – regulation 6(1) Screening Opinion for Proposed Development of a Wind Farm**

SMD/2025/0139 - Land at Bradshaw Lane, Ipstones, Staffordshire Moorlands

In response to your letter dated 18th March 2025, an EIA screening assessment has been undertaken as requested. The assessment has referenced and relied on details submitted with the request and the previously submitted pre application enquiry ref. PAD/2025/0001.

The proposed development is of a type listed at Column 1, Section 3 (i) of Schedule 2 to the 2017 Regulations, namely: Installations for the harnessing of wind power for energy production (wind farms).

The proposed project is listed in the first column in Schedule 2 of the 2017 Regulations and exceeds the relevant threshold set out in the second column in that the development would involve the installation of more than 2 turbines with hub heights that exceed 15 metres - the proposed development would, in this case, involve the installation of 8 turbines and significantly exceed the height threshold. The development would also be carried out in a 'sensitive area' because it would be near to the Coombes Valley SSSI. The proposal therefore needs to be screened by the local planning authority to determine whether significant effects on the environment are likely and hence whether an Environmental Impact Assessment is required.

In preparing this screening opinion the LPA has had regard to the selection criteria in Schedule 3 of the 2017 Regulation and to the 'Indicative Thresholds and Criteria' set out in the Planning Practice Guidance.

The guidance advises that key issues to consider for this type of development is the scale of the development, its visual impact, and potential noise impacts. It also refers to an indicative criteria and threshold of commercial developments of five or more turbines, or more

than 5 MW of new generating capacity. It is noted that in this case the proposed number of turbines would be 8 and anticipated output is given as c.49.9MW.

The selection criteria for screening Schedule 2 development, that is provided at Schedule 3 of the regulations, are considered in turn below.

Characteristics of the development

The key characteristics relative to the proposed development relates to the height, number, and blade span of the turbines. The number of turbines proposed significantly exceeds the Schedule 2 threshold of two, and the indicative threshold of five. Plans previously submitted indicate the turbines would be 115metres to hub plus the blade length taking them to 196m in total height. The turbines would be significant in size and scale both individually and cumulatively. Rotating turbine blades, that are substantial in size and number, have the potential to generate significant noise and shadow flicker that could cause nuisance to residents and visitors to the area.

Location of the development

The proposed turbines would be located adjacent or near to the Coombes Valley SSSI and therefore, near to a 'sensitive area' for the purposes of the Regulations. Many of the proposed turbine locations are surrounded by public footpaths and roads. The site is located within the Churnet Valley and specifically in the landscape character type of 'Dissected Sandstone Highland Fringe'. The Churnet Valley, is an area key to the Council's tourism strategy, and was put forward to be an Area of Outstanding Natural Beauty (AONB) in recognition that it is a landscape of special character. The Council has previously prepared a [Wind Turbine landscape sensitivity study](#) which assesses the capacity of the landscape to accommodate wind turbines. Due to their size, the proposed wind turbines are considered Category E wind turbines (111-140m) [the highest category considered] and the study indicates that the landscape (LCA 4: Dissected Sandston Highland Fringe) is deemed highly sensitive to wind turbines of this scale.

The development would fall within the amber impact risk zone for great crested newts. Impact risk zones have been derived through advanced modelling to create a species distribution map which predicts likely presence. In the amber impact zone, there is suitable habitat and a high likelihood of great crested newt presence.

Types and Characteristics of the potential impact

The most obvious characteristics of the proposed development would be the significant height, number, and blade span and movement of the turbines. Having regard to the key issues relating to the scale of the development, its visual impact, and potential noise impacts - the proposed turbines would be of massive scale and appear dominant and numerous in the landscape, spatially covering a vast area of land. The turbines would have impact on a sensitive landscape character adjacent to the Coombes Valley SSSI. Potentially, the turbines would be visible from the adjacent Peak District National Park.

The character of the landscape will completely change for the lifetime of the development which, although the development may be reversible, is likely to coincide with a significant proportion of a person's life. By reason of the structures scale and purpose, there would ultimately be no possibility of effectively reducing the impact and the development being absorbed into the natural environment. The matter of landscape character would be a key consideration in the planning application. It will need to be addressed as part of a comprehensive Landscape and Visual Impact Assessment. For the purposes of the

Regulations significant effects are considered to be likely. The large scale developments would, individually and cumulatively, appear as highly unusual features in this landscape given their number and size and not in keeping with its character.

Given the scale and number of the turbines proposed they are likely to generate noise and shadow flicker in the environment that has the potential to cause nuisance to residents and visitors to the area. A noise impact assessment and shadow flicker assessment would be required.

It must be determined at the appropriate stage whether there is a reasonable likelihood of protected species being present and impacted by the proposed development. Therefore it would be recommended that further information is required in the form of eDNA surveys and assessment of on-site habitat and connectivity between ponds within and across the site, to be able to rule out the impacts upon great crested newts. Alternatively, there is the option of joining Staffordshire Moorlands District Council's Great Crested District Licence Scheme. This would demonstrate that any impacts to newts can be fully mitigated and compensated for. Information on the District Licensing Scheme operated by the council can be found at www.naturespaceuk.com and enquires can be made on the webform there.

For the reasons above, and taking account of the selection criteria in Schedule 3 of the Regulations and key considerations of the scale of the development, its visual impact, and potential noise impact, it is considered that the proposed development is likely to have significant effects on the environment ('Positive Opinion') and that an Environmental Impact Assessment is required. In addition and, in particular, a comprehensive Landscape and Visual Impact Assessment (LVIA) and heritage impact assessment will also be required.

Yours faithfully

X 

Signed by: Ben Haywood

On behalf of Staffordshire Moorlands District Council