

Staffordshire Moorlands District Council
Development Control
Moorlands House
Stockwell Street
Leek
Staffordshire
ST13 6HQ

Our ref: SV/2025/112950/01-L01
Your ref: SMD/2025/0136
Date: 11 April 2025

Dear Sir/Madam

EIA SCOPING REQUEST FOR A NEW SOLAR ENERGY FARM AT NEWHOUSE FARM, COTTON, LANE COTTON, STAFFORDSHIRE, ST10 3DT

Thank you for consulting us on the above scoping opinion which we received on the 24 March 2025.

Having reviewed the EIA scoping report (New House Farm Solar Project - Information to Support a Scoping Opinion Request, number 664056, dated 18 March 2025, prepared by RSK) we are broadly in agreement with the proposed scope of the Environmental Statement, but have the following comments to make with regards to our remit.

We note the key environmental factors identified by RSK that have been scoped in are landscape & visual impact; biodiversity; noise & vibration. Based on the site constraints we broadly agree.

Following a review of the environmental effects, the ES should make an assessment of the measures envisaged to avoid (our preference through location and design), reduce and remedy these effects.

As a general guide, reference should be made to our Environmental Impact Assessment (EIA) Scoping Guidance:
<https://www.gov.uk/government/publications/environmental-impact-assessment-eia-a-handbook-for-scoping-projects>

We also like for your consideration other environmental issues that you may want to consider within the application.

Site context

Environment Agency
Worcester Road, Kidderminster, Worcestershire, DY11 7RA.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
Cont/d..

The above report advises that the application site covers approximately 42.79 hectares of land, c.900m to the north of the village of Cotton, Stoke-on-Trent, which consists of several agricultural field parcels of varying size (currently utilised for grazing purposes).

The site is bordered by the A52 along the north boundary and Ellastone Road along the northeastern boundary.

Flood Risk

Based on our Flood Map for Planning (Rivers and Sea) the site is located in Flood Zone 1, which is land defined in Table 1 in the Flood Risk and Coastal Change section of the National Planning Practice Guide (NPPG) as having a '*low probability – land having a less than 0.1% annual probability of rivers or sea flooding*'.

Our Flood Map primarily indicates flooding from main rivers, not ordinary watercourses. Also, any watercourse with a catchment of less than 3km² will be unmodelled.

We note there are ordinary watercourses within the site. Where a watercourse is present in proximity to a proposed site, but the flood map provides no indication of flood extent, you should not assume flood risk is low and will need to consider other methods of assessing fluvial flood risk to confirm that the risk associated with these watercourses.'

Based on the scale of the proposed development, a Flood Risk Assessment (FRA) will need to be undertaken, in line with the National Planning Policy Framework (NPPF), as part of the EIA. We advise reference is made to the Council's Strategic Flood Risk Assessment (SFRA) which will also include local flood risk information to inform the FRA.

We note reference to this has been included in paragraph 4.12.2 of the Report.

Protection of Controlled Waters

Based on our records, the site is located above a Secondary A aquifer (Sandstone), with no superficial aquifer. As a result, the site has a fairly low groundwater sensitivity. The site does not fall within a designated Source Protection Zone for public drinking water according to our internal records.

There may be private water supplies in the area, records of which may be held by the Council's Public Protection team. The applicant is advised to contact British Geological Survey (BGS) for records of any boreholes etc; and make enquiries with adjacent properties and landowners.

The report confirms the existing use of the land is identified as permanent grassland used for agriculture, therefore it is unlikely to present significant land contamination. As the development would only involve minimal ground disturbance the risk to controlled waters is likely low.

Developers should incorporate pollution prevention measures to protect ground and surface water. We refer you to the latest Pollution Prevention Guidance targeted at specific activities, available at: <https://www.gov.uk/guidance/pollution-prevention-for-businesses>

Biodiversity and Ecology

In England, under Schedule 7A of the Town & Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) it is now mandatory for planning applications to deliver a 10% uplift in biodiversity.

Biodiversity net gain (BNG) is a way of creating and improving natural habitats. BNG makes sure development has a measurably positive impact ('net gain') on biodiversity, compared to what was there before development.

While we are not a statutory consultee on BNG, we have an interest in improving the biodiversity / ecology of the water environment and may comment in this respect on any forthcoming planning application and in relation to priority species within our remit (Water Voles, Otters, Cray fish etc).

We encourage the applicant to include biodiversity improvements within this development, which include the water environment (ordinary watercourses etc), to develop priority habitats and enhance local ecological networks that benefit wildlife and provide climate change resilience measures.

We encourage the applicant to explore opportunities, through this development, to enhance the water environment (e.g. improvements to water quality, creation of priority habitats etc) in line with WFD and River Basin Management objectives

[Humber river basin district river management plan: updated 2022 - GOV.UK](#)

Water Framework Directive

The site falls entirely within one catchment as defined by the WFD: this is named the 'Churnet from Consall to River Dove' which is currently afforded 'moderate' ecological status. The aim is to maintain/achieve 'good' ecological status by 2027. Where possible, the development should consider ways to increase local biodiversity and ecology to meet the Water Framework Directive targets.

[Churnet from Consall to River Dove | Catchment Data Explorer | Catchment Data Explorer](#)

The implementation of Rural SuDS may help with reducing pollution run-off and enhancing water quality. Your LLFA will be able to advise on this. Further information is available via: <https://www.gov.uk/government/publications/rural-sustainable-drainage-systems>

An Invasive Non-Native Species plan should be put in place to ensure that nonnative invasive plants and animal species are not spread to or from the site (an offence under Wildlife and Countryside Act 1981).

We advise consultation with Natural England and your Biodiversity Officer.

I trust that the above confirms our position and we would appreciate a copy of the decision notice in due course.

Yours faithfully

Miss. Georgia Edwards
Planning Officer