

Our ref. SMD/2025/0148

Your ref. Wormald/SlateHouse/WT/DC

14/04/2025

Mr D Cooney
Bagshaws
6 Market Street
Leek
ST13 6HZ

Dear Mr Cooney

**Town and Country Planning (Environmental Impact Assessment) Regulations
2017 – regulation 6(1) Screening Opinion for Proposed Development of a Wind Farm
(Installations for the harnessing of wind power for energy production)**

Land at Slate House Farm Morridge Top, Onecote, Staffordshire Moorlands ST13 7SF

In response to your correspondence of 24th March 2025 addressed to Mr Haywood an EIA screening assessment has been undertaken as requested and is set out below.

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 development would exceed the relevant threshold set out in the second column, in that the development would involve the installation of a wind turbine where the hub height (or any part) exceeds 15 metres.

The proposed development would involve the installation of a turbine which at 78.33m to the hub and 119.33m to the blade tip would significantly exceed the Schedule 2 height threshold (by virtually a factor of eight). The development would also be taking place in or near to a 'sensitive area' as defined as it would come to within c.150m of the Peak District National Park. 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 Regulations 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 are the scale of the development, its visual impact, and potential noise impacts. The guidance also sets out certain indicative criteria and thresholds for commercial developments in which a scheme with five or more turbines, or more than 5 MW of new generating capacity may be expected to require EIA. It is noted that you have submitted concurrently with this application on behalf of the next door premises at Garstones Farm a closely similar proposal for an identical turbine at within some 330m to c.400m separation. Each turbine is stated to deliver a 3MW output which taken together would exceed the 5MW indicative threshold.

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

Characteristics of the development

The characteristics of development must be considered with particular regard to 7 listed points (a) to (g). Of these it is considered that for this proposal at least the following need to be considered.

- (a) the size and design of the whole development;
- (b) cumulation with other existing development and/or approved development;
- (e) pollution and nuisances;

The key characteristics of the proposed development stem from its height and the scale and movement of the rotating blade span / circumference giving rise consequently to significant visual prominence. There may also be considerations of noise and shadow flicker that could cause nuisance to residents and visitors to the area. There are existing nearby wind turbines at Garstones Farm (SMD/2012/0893) and Lane End Farm (SMD/2013/0934). There would also be a cumulative impact to consider if the new concurrent application at the adjacent Garstones Farm also proceeds. The turbine proposed at Slate House Farm would be significant in size and scale and would be likely to appear 'massive' relative to the characteristics of its surroundings. These are otherwise modest and in the main small scale in nature. The defining features of the immediate surroundings are individual farmsteads of relatively domestic scale; drystone walls, field gateways and livestock. The existing adjacent turbine at Garstones Farm is 24.6m to the hub and 34.2m to the maximum blade tip height. This proposal would be 3.5x larger in height to blade tip. The sail diameter of the blades would be 82m as against 19.2m for that at Garstones Farm and at Lane End Farm making it more than 4x larger in diameter.

Location of the development

The location must be considered with particular regard to three listed points (a) to (c). The latter is headed 'the absorption capacity of the natural environment, paying particular attention to the following areas'. There are then a further eight itemised points including: 'mountain and forests'; 'nature reserves and parks'; '...areas classified or protected under national legislation'; and 'landscapes and sites of historical, cultural or archaeological significance'.

Although perhaps not necessarily thought of as 'mountain', in the context of the alternative selections in the criteria (wetlands, or coastal and marine), reference to mountain and forest may be considered relevant to Morridge. Indeed the OED definition of mountain includes "a large or high and steep hill" and this would not be inappropriate to the description of Morridge.

The proposed turbine would be close to the Peak District National Park boundary. This is a nationally protected area in legislation (the National Parks and Access to the Countryside Act, 1949) and an area with significant historical and cultural associations. The development would have wide visibility from within the National Park and from adjacent surroundings. Morridge itself is a defining landscape feature of the Staffordshire Moorlands District and of the National Park. Its westerly facing flank slope is striking and prominent at a landscape scale and as such marks a highly distinctive aspect of the setting of the National Park. The ridge is also in effect a continuation in landscape terms of the high ground immediately to the north west including the rock outcrops known as The Roaches, a favorite and famous visitor location in the Peak District.

The Council has a previously prepared Wind Turbine landscape sensitivity study which assesses the capacity of the landscape to accommodate wind turbines. Due to its height dimensions, the proposed wind turbine equates to Category E in the study (111m-140m) [the highest category considered] and the Gritstone Highland Fringe landscape character type (LCT 06) of this location is deemed highly sensitive to wind turbines of this scale.

Types and Characteristics of the potential impact

The most obvious impact characteristics would be visual owing to the significant height, blade span and movement of the turbine. The development would be seen in the context of a somewhat refined upland landscape in which relatively subtle and intimate variation in the skyline and other defining features of this landscape such as walls, hedgerows and farmsteads mark out the character of the area. In contrast the proposed turbine would appear relatively massive and dominant, wholly out of kilter with the range of norms otherwise identifiable.

There is also at this stage a less known potential for adverse noise impacts and the nuisance of shadow flicker. Other possible impacts relate to ecology and biodiversity with potentially significant consequences in particular for bats and birds in flight.

By reason of the structural scale and purpose of the development there would be little or no possibility of effectively reducing the visual impacts or modifying the development form to make it better absorbed into the natural environment.

Although the development may be reversible, its period of use is likely to coincide with a significant proportion of a person's lifetime for anyone living in the area and it could not be considered 'temporary' in this sense. In addition to residential receptors there are numerous public footpaths nearby and in the wider immediate surroundings. The Peak District National Park is one of the most visited National Parks in Britain and the nearby Roaches one of its most visited areas.

Conclusion

The matter of landscape character would be a key consideration in the planning application. It would need to be addressed as part of a comprehensive Landscape and Visual Impact Assessment (LVIA). The development would appear highly conspicuous in this landscape and given the dimensions involved, notwithstanding earlier wind turbine developments, significantly at odds with the area character. For the purposes of the Regulations, significant effects are considered likely and an Environmental Impact Assessment is required

In addition to a comprehensive LVIA, a noise impact assessment; shadow flicker assessment and ecological impact assessment would be expected to accompany any planning application.

Yours sincerely,

X *B.J. Haywood*

Signed by: Ben Haywood
Head of Development Services