
From: Jane Curley
Sent: 15 October 2025 09:43
To: Planning (SMDC)
Subject: FW: CVCS response to the scoping report/ EIA for SMD/2025/0136

Please can you action this request?
Thanks

Jane

Jane Curley Principal Planning Officer

Planning

High Peak Borough Council and Staffordshire Moorlands District Council

Mob: **07794 768397**

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www.staffsmoorlands.gov.uk | Follow SMDC on [X \(Formerly Twitter\)](#) | [Facebook](#)



From: SheilaWalters
Sent: 15 October 2025 07:51
To: Jane Curley
Subject: Fwd: CVCS response to the scoping report/ EIA for SMD/2025/0136



Dear Mrs Curley,

Application SMD/2025/0136/ Newhouse farm solar development

It has been pointed out to us that the email below which was sent during the period when SMDC were considering the scoping opinion option ahead of the application for the solar farm at Newhouse farm near Cauldon Lowe (ref SMD/2025/0136), ought now to be submitted or re-submitted to counter the EIA which has now been added by RSK on behalf of the developers.

I should be grateful therefore if you could oblige and ensure that the email is added to the growing list of objections on the website.

Many thanks .

Yours sincerely,

David Walters
Secretary
Churnet Valley Conservation Society
CVCS

Begin forwarded message:

From: SheilaWalters <thewalters210@btinternet.com>
Subject: CVCS response to the scoping report for SMD/2025/0136
Date: 14 April 2025 at 01:52:26 BST
To: Jane Curley <jane.curley@staffs Moorlands.gov.uk>



Dear Mrs Curley

Re scoping report for SMD/2025/0136

As a preliminary to this consideration of the scoping application for the solar development at Newhouse farm, the Churnet Valley Conservation Society (CVCS) wish to make it clear that we are not against solar energy per se, and indeed we would endorse an encourage it **but** we do have reservations within our constituted Renewable Energy Policy (Solar) about the suitability of site selection and design.

This is reflected in our approach to preferred locations where solar installations should be constructed.

Each design should be examined on merit, but in general we feel that the best locations are (in agreement with the recent survey by our local MP)

- o Brownfield sites.
- o Roofs of commercial, industrial premises and sporting stadiums etc. (including over the spaces and parking areas between such premises.
- o Above suitable open air car parking areas.

and that the Installation of Solar Panels on Agricultural Land such as here should be avoided.

Other considerations we have regarding the construction of Solar Arrays on Agricultural Land are

- Impacts to Soil, Water and Air Resources:

As with the development of any large-scale industrial facility, the construction of solar energy power plants can pose hazards to air quality. Such threats include the release of soil-carried pathogens and results in an increase in air particulate matter which has the effect of contaminating water reservoirs. The construction of solar facilities on vast areas of land imposes clearing and grading, resulting in soil compaction, alteration of drainage channels and increased erosion.

- Land Use and Ecological Uses:

As energy systems may impact land through materials exploration, extraction, manufacturing and disposal, energy footprints can become incrementally high. Thus, some of the lands may be utilised for energy in such a way that returning to a pre-disturbed state necessitates significant energy input or time, or both, whereas other uses are so dramatic that incurred changes are irreversible.

- Grazing of Sheep under a Photovoltaic Array: Much is made of the fact that sheep can be grazed underneath solar arrays. Much less is made of the fact that sheep being a prey animal do not like being underneath the solar arrays but are put there in order to claim farming subsidies for doing so.

- PV Cell 'Forever Chemicals' Pollutants from this source will potentially enter watercourses and then into the water supply for human consumption.

- Local Ground Water Heating

Japanese study reveals areas under and adjacent to PV Arrays locally heat the environment by as much as 3.5 degrees C !

Recycling of Solar Panels Issues.

- Recycling of Solar Panels:

Currently the recycling of faces a big issue, specifically, there aren't enough locations to recycle old solar panels, and there aren't enough non-operational solar panels to make recycling them economically attractive. Recycling of solar panels is particularly important because the materials used to make the panels are rare or precious metals, all of them being composed of silver, tellurium, or indium. Due to the limitability of recycling the panels, those recoverable metals may be going to waste which may result in resource scarcity issues in the future.

Those issues above are generalisations but we must now turn to the specifics of this particular proposal and set out our views.

As this is only the scoping report prior to gaining the opinion of SMDC for the **Environmental Impact Assessment** or **EIA** that will eventually be introduced alongside all the other documentation that will accompany the potential application for the solar development at New House farm, we feel it is important to draw the Case Officer's and the PAC's attention to the following observations upon its proposals.

On looking through the document itself, it seems to be a mixture of definite statements or facts that the developers intend to use to support their proposals. However whether or not they are actually true, or possibly need to be closely scrutinised as verifiable, as sometimes is the case where applicants promise things that might sound impressive, that may be impossible, or eventually overlooked, or omitted, is one aspect, but also there are a lot of vaguer or undisclosed areas in this scoping report where the detail is not available, or will be conditional, ie they have not yet worked out the problem, or don't want to draw attention to it, or maybe even have no idea at present how to deal with it and so prefer to keep their powder dry at this point.

That is the usual nature of scoping in that it defines the general parameters of the scheme, but these can be altered or tinkered with later and from our own experience at nearby Moneystone quarry, it is difficult sometimes to keep the developers to their word. or to account, when alterations take place from the original.

For starters, there is a significant disclaimer at the opening of the document for all its apparent grandeur and evidential power, knowledge or influence.

"RSK Environment Ltd (RSK) has prepared this report for the sole use of the client, showing reasonable skill and care, for the intended purposes as stated in the agreement under which this work was completed. The report may not be relied upon by any other party without the express agreement of the client and RSK.

No other warranty, expressed or implied, is made as to the professional advice included in this report.

Where any data supplied by the client or from other sources have been used, it has been assumed that the information is correct. No responsibility can be accepted by RSK for inaccuracies in the data supplied by any other party. The conclusions and recommendations in this report are based on the assumption that all relevant information has been supplied by those bodies from whom it was requested.

No part of this report may be copied or duplicated without the express permission of RSK and the party for whom it was prepared.

Where field investigations have been carried out, these have been restricted to a level of detail required to achieve the stated objectives of the work.

This work has been undertaken in accordance with the quality management system of RSK Environment Ltd."

But we note the provisos....

RSK Environment Ltd (RSK) has prepared this report for the sole use of the client, showing reasonable skill and care, for the intended purposes as stated in the agreement under which this work was completed. .

We must ask therefore what is reasonable skill and care ?.... does that mean it is not totally perfect or reliable and under what agreement was it made ?

Where any data supplied by the client or from other sources have been used, it has been assumed that the information is correct. Assumption, so not necessarily definitely true.

No responsibility can be accepted by RSK for inaccuracies in the data supplied by any other party. The conclusions and recommendations in this report are based on the assumption that all relevant information has been supplied by those bodies from whom it was requested.

No overall responsibility for errors then?

Where field investigations have been carried out, these have been restricted to a level of detail required to achieve the stated objectives of the work.

Re restricted objective ,what level of detail is meant?

The definition of the EIA also reminds us it is an assessment only, not necessarily accurate eg

This helps to ensure that the importance of the predicted effects and the scope for avoiding, preventing, reducing or, if possible,

offsetting them are properly understood by the public and the authority granting consent (the 'determining authority') before it makes its decision.

Words and phrases like *helps to ensure..... if possible* ,.... again reminds everyone that it is not necessarily waterproof or cast iron guaranteed .

On more specifics within the document and possible implications.....

Section 1.3.4 of the report gives a useful starter for criticism as a result of SMDC's first approach when they gave an opinion to the developers .

The Screening Opinion concluded that the Proposed Development would likely have significant effects on the landscape, visual amenity, and ecology.

CVCS whole heartedly concurs with these effects.

These form the basis upon which we object to this particular site namely:-

1. It is too much of an obvious visual intrusion into the local landscape in scale and location.
2. It will impact severely upon the established setting of a number of archaeological and historic assets

3. It will lead to the actual wide spread destruction of known above ground assets of local and national importance and potentially below ground associated features.

4. It will destroy or impact deleteriously upon established ecology and biodiversity as well as introducing (in alleged mitigation) alien species and bioforms.

To ourselves, and we suggest to the vast majority of people who know and appreciate the area, as well as observant strangers, or visitors arriving via the south west up the A 52 heading to Ashbourne, Cauldon Low and into the Moorlands or Peak district etc., it is the visual impact of the development that will be so blatantly apparent as they progress up the slopes to the high ridge of land in front of them with the full panoply of solar panels and sundry elements of the scheme visible all the way up from the edge of Garston and Whiston, right up to the top crossroads where the A52 crosses the Ellastone road which itself will form the outer northern boundary of the site.

The site will be always be visible as it sits in the near distance above the road for almost two miles as it ranges across the open high moorland.
No amount of boundary screening can obviate this phenomenon because of the topography of the constantly rising landscape on which it is being proposed to develop the solar farm.

Likewise the true viewscape from that rising ground, that is a computer based projection of all the places below the site, and into the distance from which it will be seen in all directions, is far more widely ranging than the modest sample offered in the evidence so far.

We know that on a clear day we can look out from the Ellastone road and see for miles over to the Welsh border and south to Cannock Chase, so we thought we should check on a more local view using a computer viewshed on google earth to see how the local area would be affected.

Basically on the two images we are attaching, we have picked a spot, a landmark just

below the top of the ridge ridge between the houses/ farms along the ridge from and the crossroads and where the solar farm is to be located, and using a spot height of just 2 metres above ground level, all those areas in bright green can be seen from that position.

But of course it is a two way device, so all those areas in green should also be able to see the landmark with the batteries or banks of solar panels arrayed up and down the ridge where the solar farm will be spread.

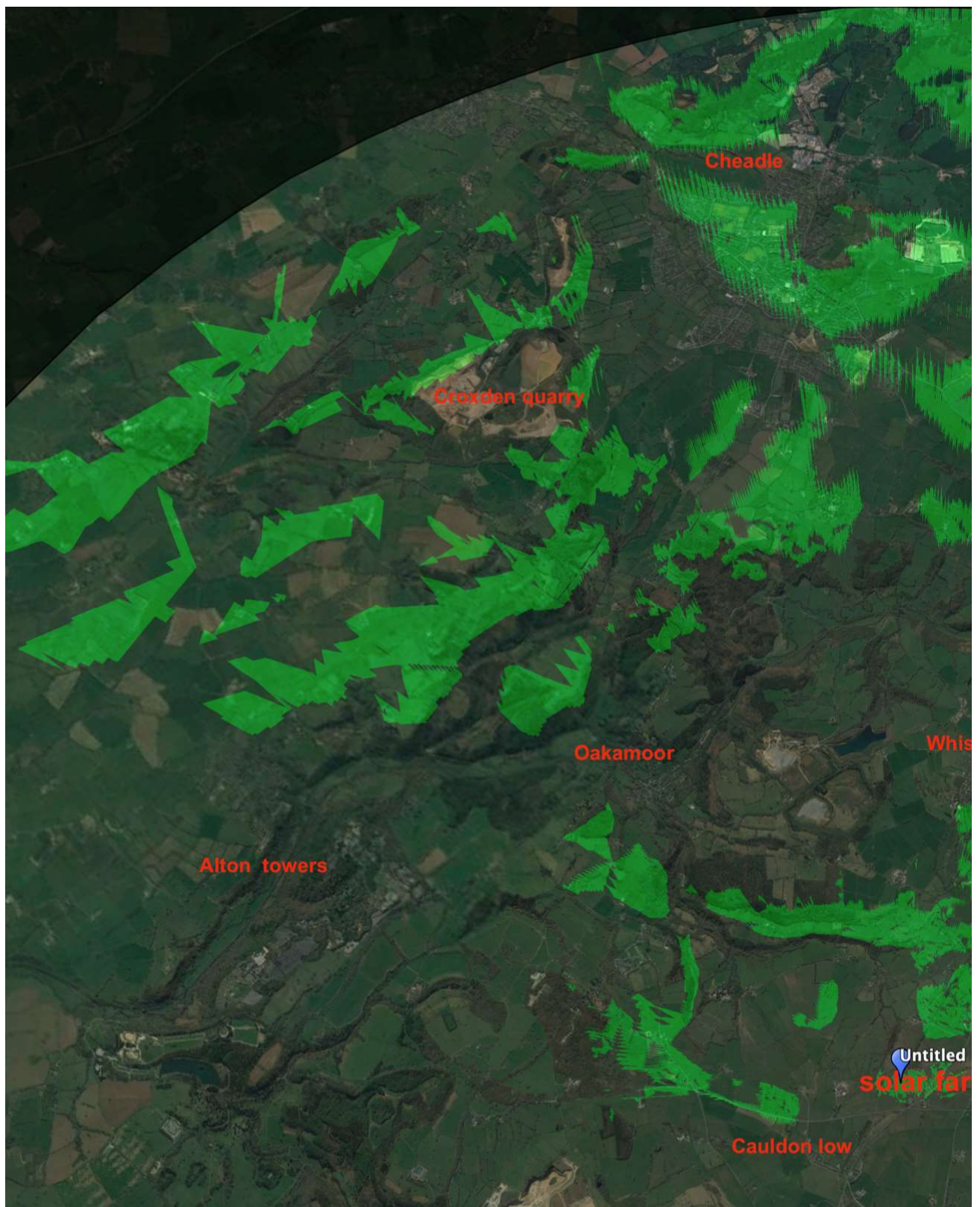
We've located one or two local features on the first image so you can get the approximate position as obviously the google image is looking down from above, so the landscape perspective is flattened and it is not always easy to recognise where you are. The view in this instance is from an oblique position as if you were hovering over the quarry at Cauldon and looking west.

The second image is slightly higher and identifies the nearest settlements in the distance amid the green visibility areas.

That is from just one spot on the solar farm but the area of intervisibility involved is huge.

The areas shown in green on the map from google earth are those in the view shed from the untitled location which is just below the top of the hill farm.
In other words the solar farm will be visible from those places which are





These are outlines of the range of visual impact that the site would have, but obviously the landscape closer to the site or adjacent to it, including the ridge road (or Ellastone road that runs along side it) will have the magnificent, panoramic views currently out to the west and directly towards Wales, obscured by any roadside screening and by the arrays of panels themselves that will intervene.

On the ecological impact of the proposal on the landscape there are a number of other concerns that should be raised, some of which we have outlined in brief below again using some of the text from the report itself.

For example

Objectives

2.2.1 *The Proposed Development will seek to fulfil the following objectives:*

- *Generate renewable energy to help alleviate climate change and the social issues associated with this.*
- *Contribute towards an independent, secure energy supply in the UK, which is particularly relevant given the current geopolitical climate (for instance the invasion of Ukraine).*
- ***Deliver significant biodiversity net gains, both in respect of habitat units and new hedgerow planting, to provide an overall positive impact on local biodiversity.***

Whereas we might well agree generally with the first two, the third claim is very debatable in this aspect of the proposal .

2.3.2 *The Site is bordered by the A52 along the north boundary and Ellastone Road along the north eastern boundary. There is a farmstead to the south east of the site ('P H Winterton & Son'), as well as other detached properties located sporadically to both the north and the west. To the centre of the site, there is a disused railway tunnel, which is overgrown at the point of access.*

This rather plays down, or reflects ignorance of, the presence and significance of the major landscape features of the historic tramways/ roads. There are four major linear routes with above ground features that crisscross the area for the solar farm development and all of which would be impacted or destroyed in the process.

They are the 1776-1778 plateway; the 1783 reconstruction; the 1804 Rennie tramway and the 1849 Trubshaw line, all of which pioneering technological routes linked the stone quarries at Cauldon Low to the canal hub at Froghall and the wider industrial world beyond .

This area is unique in having four completely different types of historically important very early ' railways ' running across it, all of which would be under severe threat as a result of this application succeeding.

Mitigation ?

Likewise these proposals should be considered intrusive as they are not what has naturally developed in the landscape we see and enjoy at the moment .

2.4.5 *The Proposal Development incorporates a series of measures to mitigate the potential effects on the immediate and surrounding landscape. This includes the retention of as many important landscape features as possible and the inclusion of an appropriate landscape scheme. Planting stock used in the landscape proposals would be native and, where feasible, locally sourced. The species choice for screening would take into consideration the native species that are present in the vicinity of the Site. Furthermore, any planting of proposed trees and shrubs would also be size appropriately to their location.*

2.4.6 *The following mitigation and enhancement measures have been incorporated into the current Planning Layout (Appendix B) to respond to the initial findings of the landscape and visual impact assessment:*

3.
 - *Proposed hedgerow planting (to be maintained to a minimum height of 3m)*
 - *Proposed native woodland mix (to be planted at 1m)*
 - *Species rich grassland*
 - *Repair and maintenance of existing dry-stone walling*

2.4.7 *planting strategy for the Proposed Development would result in a significant increase in biodiversity habitat units and increased hedgerow planting throughout the Site.*

All of these measures above involve new vegetation types that will completely alter the landscape. How significant the increase or benefit will be is not proved. Replacing the area with such new measures will alter what is there already, which in itself is important as it already supports a specific biodiversity that is uniquely valuable.

2.5 Approach to addressing uncertainty

These paragraphs in this section make the case for the alteration of plans later on.

eg It is typical for large infrastructure projects to contain the ability to alter the final design of a scheme by having “limits of deviation” or including for a “micro-siting allowance”.

Likewise the use of The Rochdale Envelope is an acknowledged way of dealing with an application comprising EIA development, where details of a project have not been fully resolved by the time the planning application is submitted. The term is used to describe those elements of a scheme that have not yet been finalised, but yet can be accommodated within certain limits and parameters allowing the likely significant effects of a project to be presented in the Environmental Statement as a 'worst case'. It also provides the opportunity to assess aspects of a development where the detailed design is to be developed by the Applicant and approved by the determining authority under a planning condition, subsequent to the planning consent being made.

Another example of vagueness which benefits the developer is they can alter things later.

3.

2.5.4 *Furthermore, such flexibility may be useful where a change in the design or capacity of the Proposed Development is anticipated, but not yet certain. See also 2.5.5.*

3.2.4 *The Applicant has actively engaged with the Local LPA by utilising the Council's Pre-application Service. As part of this proactive approach, Pre-application Advice was received from the Case Officer via email on September 12, 2023. This initial consultation provided essential feedback on the Proposed Development and helped to shape the project in accordance with the Council's planning expectations and requirements.*

This information should be open to the public.

3.2.9 *No consultation for non-statutory consultees has been undertaken to date. However, a comprehensive public consultation is due to be held in 2025, prior to the submission of the Planning Application. The approach to this exercise will likely take the following form:-*

- **Letters and leaflets to residents and locally elected members**
- **In-person consultation event**
- **Dedicated email inbox**
- **Feedback forms**

3.2.10 *This consultation will be followed by a Statement of Community Involvement (SCI) which will provide a full summary of the public consultation process, the comments received and our response to them.*

3.2.11 The public consultation will be held in line with the relevant guidance at Staffordshire Moorlands District Council.

This is vital consultation that we must make sure happens.

However from experience at Moneystone, this was an exercise just to tick the box and had no useful consequences to the many issues that were raised by the public at the time .

Section 3.3 is an admission of the problems or shortcomings to note for later.

3.7 Mitigation

Mitigation can be relied on to reduce any potential significant effects from the Proposed Development. The sequential steps of the mitigation hierarchy are as follows:

- *Avoidance – take measures to avoid creating impacts from the outset;*
- *Minimisation – measure taken to reduce the duration, intensity and extent of the impact if they cannot be avoided;*
- *Restoration – measures taken to improve ecosystems following exposure to unavoidable impacts; and*
- *Offset – measure taken to compensate for any residual impacts.*

These are useful guidelines to which to refer as they set out what we as a group want to happen .

Likewise we will use the criteria that will be taken into account when determining the significance in the eventual EIA, as arguments for opposition.

3.8 Assessment of likely significant effects

3.8.1 *The ES will report on the likely significant environmental effects for the site preparation, earthworks and construction (hereafter referred to as ‘construction’), operational (i.e. once completed and open to use) and decommissioning phases of the Proposed Development.*

3.8.2 *The following criteria will be taken into account when determining significance:-*

- ***The receptors/resources (natural and human) which would be affected and the pathways for such effects;***
- ***The geographic importance, sensitivity or value of receptors/resources;***
- ***The duration (short-term, medium-term or long-term); permanence (permanent or temporary) and changes in significance (increase or decrease);***
- ***Reversibility - e.g. is the change reversible or irreversible, permanent or temporary;***
- ***Environmental and health standards (e.g. local air quality standards) being threatened; and***
- ***Feasibility and mechanisms for delivering mitigating measures, e.g. Is there evidence of the ability to legally deliver the environmental assumptions which are the basis for the assessment?***

However there is a large section of the report which denigrates many potential objections by opting to remove many environmental factors out of future scoping. If accepted, this seems likely to weaken some crucial evidence we might put forward in our case against the development . These are listed under **section 4 of the report pp 17 - 38** and are somewhat contentious.

The argument being mainly that mitigation conditions could be imposed with the granting of permission to offset any occurrences of foreseen problems that might be raised by objections.

However it is well known that putting in loads of conditions is not necessarily evidence of good planning. Making a bad plan acceptable by such methods is not to be encouraged.

For example the heritage section of the scoping report which assesses some of the problems that might be present, does not recognise other pertinent and potent factors in its analysis and this is where there is a need to be very vigilant as the developer's analysis is somewhat limited .

Claims of archaeological sampling and information gathered from desk top surveys is not sufficient these days. Some of the information put forward in this report is incorrect and can be shown in error or by lack of knowledge of the ground and landscape features that will be impacted eg the plateways and prehistoric setting of monuments.

It will be no use imposing conditions once the construction work has been carried out and it has impaired or even destroyed such features.

Another example of rather superficial or misguided claims is, as mentioned earlier, to suggest that planting of trees, shrubs and boundary hedges will enhance and improve biodiversity, or screen the site.

What gains of biodiversity are not provided in detail, but the argument we make is that this is a long established, moorland landscape, and its value lies in its rarity in upland areas where modern agricultural improvements have taken place, replacing the precise conditions that make this particular area so diverse and specialised.

Introducing new hedges will alter biodiversity but not necessarily improve what unique ecosystems that have evolved for centuries in the soils, as impoverished though they might appear to be, they nevertheless support important life forms, primarily because of the isolated, unimproved nature of the landscape, that has allowed them to be sustained.

Introducing new, or what is traditionally alien species to those areas, does not necessarily alter the landscape for the better. Instead it threatens to upset the current balance of nature and what is nowadays a uniquely valuable environment by altering the visual vegetational or topographical features within it.

On a site of such magnitude and with such a significant process of landscape modification as is being envisaged, archaeological identification and interpretation has to be another major consideration using geophysical, palaeosol, palynological and molluscan data to provide a more detailed understanding of the extent, scale and character of any earlier settlement and / or land use. as there are visible traces of early field systems of medieval and possible prehistoric origin, notably showing up on the lidar scans.

Rather than reaction after the event, the argument for heritage and archaeology should be with the developer to prove that such conditions, remnant subsurface features etc, are not present **before** any development is granted permission.

A typical analogy is that nowadays before large scale, new housing developments take place, the whole site is normally surveyed by ground penetrating radar or subjected to other modern subsurface, large area exploration using multi channel GPR surveying, data verification and visualisation and analysis beforehand.

To capture clear, real-time data for archaeological surveys with intelligent, state of the art sensors and software solutions that deliver unparalleled insights into historic features below the surface is the expected norm.

That is what is needed in this instance to be sure that the development doesn't impact on what is there, or to prove otherwise that there is no archaeological evidence lurking below the surface.

We know that prehistoric burial mounds exist all along the line of the upland ridge that stretches from Cadlow near Ipstones and Foxt, right through to Cauldon Low to Ramsor and the Weaver hills .The significance of that landscape for burial and its importance to peoples of the past is recognised to a certain extent, but if people were actively burying their relatives or kinfolk in that landscape, they would also have been living nearby.

We have no evidence of any above ground survivals other than the barrows, yet who knows what is under the soils thereabouts as people must have been living there? Unless we go to such lengths to prove that the soils upon which this development will be sited don't contain forensic, archaeological evidence gleaned from proper large scale survey methods using modern technology that is now available, or take pollen samples for analysis to learn from such palaeosols to find out what conditions were like thousands of years ago, then we will be destroying the evidence of our history.

Yes, it is costly for the developers to carry it out properly, but they should do so as the fiscal returns for the solar energy harvested will obviate that expense.

Finally, there is the question of the impact upon the setting for the heritage assets and that again involves the intrusiveness of the modern solar development upon the traditional moorland landscape when viewed from the asset itself.

The main feature this time is one not recognised by the scoping report, as they have not realised that nearby Pikelow Farm that overlooks the site has a barrow sitting just above it with extensive views across the whole site. That choice of prominent position was vital to its creation honouring the dead thousands of years ago and it remains as a visible feature as originally intended.

That same setting criteria also applies to the various historic early plateways that will be impacted in many places as their historic settings have always been nestled in the moorlands landscape through which they pass and into which they were created. The nature of that landscape has played such a big role in their historic purpose. The whole purpose of the design and position of the plateways was the adaptation of the terrain of the landscape that was intended to create a passage or passages through the same landscape as is there today. To replace the natural moorlands landscape with the artificial modernity of the solar panels will completely destroy their setting.

It may be that it will be argued that they are not protected by law as yet, so are not recognised as scheduled designated assets by the NPPF, but they are registered on the HER, and so, as they still survive and are recognisable as undesignated assets which have similar importance under NPPF provisions, they and their settings have to be accounted for in any weighing of the planning balance.

The scoping document also refers to drainage but emphasises the natural phenomenon and its effect in its consideration only, rather than exploring the potential run off from the panels carrying contaminants and the risk to the aquifers used by water supply companies such as SWT etc. which is a major concern we need investigated independently and flagged up if necessary as a possible health hazard and as a serious precautionary objection.

Also the connective pathways of the run off from the solar panels and general drainage patterns from the ridge down to the lowest receptor which will be the River Churnet, will be of concern to Severn Trent Water and the Environment Agency.

So, with all or at least some of these salient points to contemplate carefully, we would urge the Council to think again upon the environmental and health risks involved in siting a solar farm in this location as currently described in the scoping document.

Yours sincerely

David Walters
Secretary
Churnet Valley Conservation Society
CVCS

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