

Staffordshire Moorlands District Council

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05 June 2026

EIA SCOPING REQUEST FOR ENERCON E-82 3MW 119M WIND TURBINE AT SLATE HOUSE FARM

SLATE HOUSE FARM, MORRIDGE TOP ROAD, ONECOTE, STAFFORDSHIRE, ST13 7SF

Dear Arne Swithenbank,

Thank you for your consultation on the above Environmental Impact Assessment (EIA) Scoping Opinion application, received by us on 19 May 2026.

We have reviewed the EIA Scoping Report (dated 10 May 2026) and can offer the following comments and recommendations to make for your consideration.

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-project>

We note the key environmental factors identified that have been scoped in are landscape & visual impact and cumulative landscape and visual effects. Whilst other matters, such as those listed below, appear to have been scoped out of any further consideration we would recommend these environmental topics be addressed to a relevant degree within the Environmental Statement and/or any evidence base in support of the forthcoming planning application:

- Protection of Controlled Waters
- Fluvial Flood Risk
- Water Framework Directive
- Biodiversity

Site Context: The above report advises that the application site sits around 375m AOD in a rural area. The surrounding area is utilised as agriculture land.

Wind Turbine at Slate House Farm: We note according to the EIA report, the proposal seeks to deliver a replacement of an existing 50kW wind turbine at Slate House Farm with a single Enercon E82 wind turbine of greater scale. The report suggests the proposed wind turbine would have a maximum blade tip height of 119m and the maximum rotor diameter would be 82m. We note from the report that it will generate 60 times greater the amount of renewable energy than the existing turbine.

Protection of Controlled Waters: Reference to the relevant BGS 1:50,000 scale map indicates that the entire site bedrock aquifer is classified as a Secondary A (mudstone, siltstone and sandstone). A small section where the access is, a superficial aquifer is present known as a undifferentiated Secondary aquifer (clay, silt, sand and gravel).

The site does not appear to 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.

We recommend a water features survey be undertaken to identify and then avoid/ mitigate any impact upon any local water features.

While the existing use of the land is identified as being predominantly mixed-use agriculture, it is important to establish any historic uses that could have given rise to contamination.

Whilst it would appear that the site is of a lower sensitivity with regards impact on controlled waters we would recommend a preliminary risk assessment be submitted as part of any future planning application to evidence that the risks to controlled waters have been understood and can be appropriately managed. A strategy should also be put in place should any unforeseen land contamination be identified during future development (see WM Land Contamination Guidance attached).

Our approach to ground water protection can be reviewed in the following position statements 'The Environment Agency's approach to groundwater protection',

Fluvial Flood Risk: Based upon our indicative flood map for planning, the site is within flood zone 1, an area considered to be at low risk of fluvial flooding.

We note there is an ordinary watercourse south of 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. We recommend other methods of assessing fluvial flood risk to confirm the risk associated with these watercourses.

Responsibility for local flood risk management, including ordinary watercourses, lies with the Lead Local Flood Authority (LLFA). They may hold information on local flooding that is not identified on our Flood Map.

Whilst the site lies within Flood Zone 1, based on the Flood Map for Planning, a site-specific flood risk assessment should accompany the planning submission as the site appears to be in excess of 1 hectare (NPPF, Section 14, Footnote 63). This should consider the potential impacts of climate change. The following data source may help with this (see also WM Flood Risk Assessment Guidance attached).

[Climate change allowances for peak river flow in England \(data.gov.uk\)](https://data.gov.uk/dataset/peak-river-flow-allowances)

We note a sequential approach has been applied to the siting of all elements of the proposed development, including access arrangements, to steer development away from those areas at highest risk of flood.

The Lead Local Flood Authority will also be able to advise on flood risk associated with ordinary watercourses.

Water Framework Directive: The EIA should assess the proposals against the requirements of the WFD, which seek to ensure no deterioration to the water environment. A

WFD screening assessment, including any cross reference through other studies, should be submitted.

Risks to Water Features (including Protected Rights, Lawful Users and designated conservation sites) should be identified. If any water features are identified that could be impacted, then appropriate monitoring and mitigation measures will be required.

The site falls entirely within one catchment as defined by the Water Framework Directive (WFD); this is named the '**Combes Brook Catch (trib of R Churnet) Water Body**' 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.

Local WFD catchment data can be obtained from: [River Basin Catchment Data Explore](#)

Biodiversity: 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.

The biodiversity value of the site will need to be calculated (measured in standardised biodiversity units – see biodiversity metric: [Calculate biodiversity value with the statutory biodiversity metric - GOV.UK \(www.gov.uk\)](#) before development.

[Meet biodiversity net gain requirements: steps for developers - GOV.UK \(www.gov.uk\)](#)

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).

The Environmental Statement should be informed by an Ecology Impact Assessment, including recent field surveys.

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

An Invasive Non-Native Species plan should be put in place to ensure that non-native invasive plants and animal species are not spread to or from the site (an offence under Wildlife and Countryside Act 1981). This can form part of the risk assessment.

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

Yours sincerely,

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