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From: planningcomments@staffsmoorlands.gov.uk
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Subject: Comment Received from Public Access

Categories: [REDACTED]

Application Reference No. : SMD/2026/0326 Site Address: Padwick Farm Bradshaw Lane Ipstones Staffordshire ST13 7NN Leek Comments by: Mel MorrisMel Morris Conservation

From:
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Brookfields Road
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Phone:
Email: [REDACTED]
Submission: Neither
Comments: Heritage Assets:

Impact Assessment for heritage assets needs to be informed by the contribution that setting makes to significance, in accordance with GPA3 guidance. This is not mentioned in Section 4.5 of the Scoping Report. (4.5.22-4.5.24)

For example, Sharpcliffe Hall is a very high status complex, recognised in its designation at grade II*. It is likely to be impacted by wind turbines which affect how it is appreciated within its landscape surroundings, including its historic associations and approaches, particularly WTG-04 and WTG-07.

The proposed criteria in Table 4.8 when considering Value / Sensitivity is not sufficiently developed to determine the differences between heritage assets of the highest significance and those of lower significance. It is crude by having just three levels of significance. In terms of heritage assets, the correct approach to assessing impact is to follow published guidance such as the IEMA ħ Cultural Heritage Impact Assessment (CHIA), which is approved by both institutes, CiFA and IHBC.

This now supersedes the ħmatrix approachħ which is illustrated in table 4.10 and is considered to be crude and now out-of-date for the purposes of HIA in 2026.

Peak District National Park:

The height of the turbine blades is likely to be visible from the PDNPA. The National Park should be a consultee at this scoping stage to assess impacts on the National Park, the boundary of which is close.

RSPB Reserve:

The turbines are located very close to the RSPB Reserve & Coombes Valley and the SSSI, which is immediately adjacent. This is barely mentioned in the scoping report. The assessment of impacts should consult with the RSPB Head Office. There are major concerns about the impact of large wind turbines on local bird populations. The list of designations on the designations map excludes the RSPB reserve and appears to be a desk-top exercise, without having carried out consultation with the RSPB. The proximity of the wind turbines to the trees on the east side of the valley and overlapping the ridge, including Backhill Wood, Padwick Wood, and Six Oaks Wood, which are very sensitive and vulnerable is a particular concern for bird populations.

Public Rights of Way Network & public users:

The whole of this part of the countryside is covered in a high concentration of rights of way. In terms of sensitivity, any LVIA must consider the impact on these receptors and give them appropriate weight. This is mentioned in 4.3.17 but given the sensitivity of the Staffordshire Moorlands Walks right-of-way, which runs alongside the southern edge of the site, this should be given appropriate weight.

Mitigation:

The scoping report says, &4.5.15 The majority of impacts to the designated assets as a result of the proposed development are likely to result from visual intrusion into their setting. Given the height of the Proposed Development, it is not possible to mitigate this completely.& I suggest that it will not be possible to mitigate impacts at all on local designated heritage assets.

M Morris, BA Hons, Dip. Arch. Cons, IHBC, MRTPI

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