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Application Reference No. : SMD/2026/0326 Site Address: Padwick Farm Bradshaw Lane Ipstones Staffordshire ST13 7NN Leek Comments by: Professor Angela L. Coe

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Submission: Objection

Comments: I welcome the Environmental Impact Assessment (EIA) scoping report and the chance to comment on what the EIA should cover, however I find the document lacking and unbalanced so I am therefore objecting and making suggestions for improvement for the full EIA.

The proposal is for eight very tall wind turbines on a high area of visually prominent land close to a well populated, but highly-valued and well cared for rural area of farms, a large village along with other villages and hamlets. This area is enjoyed and provides a high quality of life not only to residents but also to many visitors wishing to enjoy the countryside.

I think that the current scoping document under-represents the impact in the following areas:

****Height of the proposed windmills: low carbon energy versus impact on the current local environment****

The proposed height of the wind turbines at 196m (643 feet) is 10x the height of the impressive St Giles Church Spire (Pugin's Gem) that dominates the skyline in nearby Cheadle, or 20x the height of an average mature tree, or about 25x the height of an average house. Furthermore, they will be sighted on the high ground. Because of the proposed height they will fundamentally change the character of the landscape and views enjoyed by residents of the area and visitors to both the area and nearby national park.

The windmills at nearby Garstone Farm are, I understand, about 34m high. It is unclear why in terms of the positives of low carbon energy the proposal is seeking windmills almost 6x this height, which are likely to have a far greater negative impact on the landscape, biodiversity, noise, infrastructure etc. because of their sheer size and this should be assessed and quantified in the Environmental Impact Assessment (EIA).

****Landscape and geological character****

The site lies on the top of prominent high ground of Ipstones Edge, this forms the distinctive southern escarpment and boundary to the whole of the Peak District and Pennines, it is also the most southern significant area of moorland/high pastureland across the middle of England. The general topographical and geological character of the area of the proposed site is the same as the Peak District National Park rather than the land to the south and west which is much lower elevation and more densely populated. In other words, the site lies on an important geological boundary, that defines this marked change in Britains topography at the southern tip of the Pennines or the backbone of England.

****Peak District National Park, protected ecological sites and ecology****

Insufficient consideration is given to the impact on the Peak District National Park. This is the first national park ever designated in Britain and serves an estimated 20 million people within 1-hour drive, making it one of top three UK national parks in terms of visitor density. The proposed wind turbine site is, in terms of environmental character, rather than political boundaries, very much part of the national park and a natural area that people overspill into and this should be considered in the EIA.

The proposed windmills would be visible from a significant proportion of the national park as well as most of the local footpaths, recreational areas and nature reserves. Better information and the proposed provision of visualisation graphics (4.2.23 of the scoping report part 1) that show the potential photographic view ¿within a 20km radius¿ are considered critical and very much welcomed. These should be numerous and comprehensive as they will allow a much better visualisation and assessment. I suggest that they should include the view from prominent landmarks, the A523 and local intensively used village pathways such as footpaths and residences in Ipstones where the scale of the structures will be very apparent.

The impact of the proposed site on the dense network of 25 other designated ecological sites, that are not only protected habitats and wildlife refuges but provide essential recreational areas requires a much fuller assessment. Of particular concern is the impact of the proposed turbines on birds, specially as Coombes Wood RSPB reserve that sits right on the boundary of the proposed site at a lower elevation. The impact of the proposed turbines on bird flight paths as they descend into the valley should be considered and the potential for mortalities identified as a risk in the scoping report fully quantified.

****Geology and archaeology: Sharpcliffe Rocks****

Two of the proposed windmills are sited directly on top of an important natural geological feature, Sharpcliffe Rocks, after which this part of the Cheddleton Sandstones (<https://webapps.bgs.ac.uk/lexicon/lexicon.cfm?pub=CDS>) of the Bowland Shale Formation rock unit is named the Sharpcliffe Conglomerate (<https://webapps.bgs.ac.uk/Memoirs/docs/B01576.html>). Whilst this site is not currently an SSSI, this is the best exposure of the Sharpcliffe Conglomerate, and shows key features of the deposits laid down in a major river system 322 million years ago, that are not visible elsewhere. Additionally, the natural shaped rock exposure and surrounding mature trees make it an area of natural beauty and therefore a Natural Capital Asset. This needs to be evaluated as Sharpcliffe Rocks natural asset would be severely impacted not only visually but also potentially in terms of its integrity in the laying of the foundations for the windmills. It should be noted that it is highly possibly that Ipstones (meaning rocky platform) and one of the larger villages in Staffordshire Moorlands derives its name from Sharpcliffe Rocks which could have been an ancient Celtic encampment (see Cockin, T. The Staffordshire Encyclopedia, Malthouse Press for a summary and references therein).

Another rock outcrop of natural beauty lying about 300m southwest of the southwest corner of the site is the Ĩpstones Sun TempleĤ, which is, in addition, a possible neolithic site. Thus archaeological as well as geological expertise and impact assessment should be sought. The natural view from the nearby Hopestone Rock that lies 2.5 km southwest of the proposed site and which has possible neolithic circular carvings should also be assessed.

****Residential amenity****

Potential impacts from noise, shadow flicker, aviation lighting on homes within a 5km radius should be provided. Given there are variables in terms of the wind turbine mechanics, local conditions etc. as identified in the scoping report the assessment should include best and worst case scenarios. Comparative scales that are easy to understand would be helpful for the reader.

****Aviation and/or other lighting****

At present Ipstones Edge, including the proposed site has dark skies and lies within the lowest 3 bands the 9 levels of light defined on <https://www.cpre.org.uk/light-pollution-dark-skies-map/>. The impact of aviation or any other lights on this needs to be assessed, given the dark skies are important for wildlife, human health and clear night views.

****Telecommunications****

The impact on all types of telecommunications both now and in terms of developing/future technology is of concern. This needs full assessment, particularly as there is a significant communications centre within 3 km of the edge of the site (Black Heath), that is purposely positioned at the edge of the prominent escarpment for maximum transmission.

****Environmental summary Ĥ section 6 of the scoping report part 1****

It is clear that this section of the report requires a fuller quantification and more thorough assessment.

For instance, the sense conveyed in these two areas of the table appear to be flawed:

- 1) There will obviously be the need for specialist heavy goods vehicles etc. to move the parts of the windmills, and a large amount of groundwork to support the structures, therefore during the construction and decommissioning the impact on the population and human health can never be ĤneutralĤ no matter what the Ĥduration of the construction or construction trafficĤ is, as inferred on p.92.
- 2) The statement Ĥno significant impacts to climate anticipatedĤ on p.96 is incorrect. There will always be climatic impacts in the construction/decommissioning of the site because of all the raw materials required for the windmills and associated foundations etc. and then of their disposal or reuse afterwards. In this case the size of the windmills will make the amount of raw materials significant.

****Cultural Heritage****

The 5km around and within the sites contains what appears to be a high density of listed agricultural buildings and housing for a rural area. A key part of this history is how these heritage assets sit in the distinctive Staffordshire moorland landscape. The impact of the proposed site on the views of and from each of these heritage assets within the 5km radius should all be assessed, not just the impact of the site on the four within it and the one on the boundary of it. For instance, there is, I estimate, a further 15 heritage assets within 1 km of the proposed site where the height of the windmills and other factors such as the movement of heavy good vehicles will be very apparent.

****Other points****

The following need to be covered in detail in an EIA:

- 1) Cumulative negative and positive impact on the current local environment.
- 2) Full risk assessment both for the development and lifetime.
- 3) Given the potential scale of the impact both during the development and its proposed 35-year lifetime on the social and environmental setting there needs to be a full public consultation and comprehensive stakeholder engagement. It would be beneficial to reference the results of this in the EIA and to provide a summary in the accompanying documentation.

****Summary****

Given the possible scale of the impact a comprehensive, robust, balanced and transparent EIA with a clear executive summary, an accessible accompanying summary for the general public and a summary of the results of public consultation are considered essential. This is so that the local population within the immediately affected area of 20km of the site and decision makers can fully understand the environmental, social and economic consequences of this large-scale proposal, that would last a considerable length of time.

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