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From: planningcomments@staffs Moorlands.gov.uk
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Application Reference No. : SMD/2026/0326 Site Address: Padwick Farm Bradshaw Lane Ipstones Staffordshire ST13 7NN Leek Comments by: Chris Daniels

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Submission: Objection

Comments: Subject: Padwick Wind Farm & EIA Scoping Report: Request for wider and more robust assessment

I am writing about the Environmental Impact Assessment (EIA) Scoping Report submitted for the proposed Padwick Wind Farm at Padwick Farm, near Ipstones and Leek.

After considering the scoping report against the Environment Agency guidance, 'Environmental Impact Assessment (EIA) & A handbook for scoping projects', I am concerned that the present scope is too narrow and does not sufficiently reflect the range of matters that should normally be examined through a thorough EIA process.

My principal concerns are set out below.

1. Environmental topics should not be excluded prematurely

The scoping report indicates that several matters are proposed to be scoped out, despite these being matters which the EIA handbook identifies as important components of a comprehensive assessment. These include:

- Traffic and transport
- Socio economic impacts
- Population and human health
- Climate and air quality
- Major accidents and disasters
- Material assets

The handbook makes clear that EIA should consider direct, indirect, secondary and cumulative effects, including impacts on people, health, amenity and the wider social and economic environment. Removing these areas from

consideration at the scoping stage may lead to significant effects being overlooked, especially given the scale, duration and rural setting of the proposed development.

I therefore ask that these topics are retained within the EIA scope and assessed in a proportionate but meaningful way, rather than excluded altogether.

2. Cumulative, secondary and indirect effects require clearer consideration

The EIA handbook places particular importance on assessing:

- ¿ Secondary, indirect and cumulative impacts,
- ¿ Interrelationships between environmental factors (e.g. landscape, ecology, water, amenity),
- ¿ Abnormal operating conditions and unplanned events.

By contrast, the Padwick scoping report appears to concentrate mainly on direct effects arising from the site itself. It gives limited attention to:

- ¿ Cumulative landscape and visual effects with existing or potential future wind energy or infrastructure;
- ¿ Cumulative noise, shadow flicker and amenity impacts on nearby settlements and dispersed properties;
- ¿ Indirect socio economic and tourism impacts arising from changes to landscape character and perceived tranquillity.

These matters should be expressly included in the Council's scoping opinion and dealt with in the Environmental Statement.

3. Alternatives, risk and mitigation need a more structured approach

The handbook explains that good scoping should include:

- ¿ Consider realistic alternatives (locations, layouts, scales);
- ¿ Use a risk based approach (source¿pathway¿receptor);
- ¿ Apply a mitigation hierarchy (avoid, reduce, abate, repair, compensate, enhance).

The current scoping material provides insufficient detail on:

- ¿ The range of alternatives considered and why the chosen option is environmentally defensible;
- ¿ How risk to receptors (residents, landscape, ecology, heritage, aviation) will be systematically assessed;
- ¿ How mitigation and enhancement will be developed iteratively through the EIA process, rather than simply described at the end.

I therefore request that the Council requires the applicant to:

- ¿ Present a clear alternatives assessment;

¿ Set out a transparent risk assessment framework;

¿ Demonstrate application of the mitigation hierarchy, including genuine avoidance and reduction of impacts where possible.

4. Local engagement and stakeholder input should be strengthened

The handbook also highlights the importance of:

¿ Early and effective consultation with statutory and non statutory consultees, NGOs and the public;

¿ Identification of local stakeholders, information sources and perceived risks;

¿ Use of tools such as prompt lists, matrices and Quality of Life Capital to structure scoping.

The scoping report does not explain in sufficient detail:

¿ How local communities, parish councils, amenity groups and other stakeholders will be involved at the scoping stage;

¿ How local environmental information (e.g. recreation, tourism, local health and amenity concerns) will be gathered and used;

¿ How perceived risks (not just ¿technical¿ risks) will be acknowledged and addressed.

Given the prominence and potential local effects of the proposal, I consider it important that the scoping opinion requires meaningful engagement with local stakeholders during the scoping process, rather than leaving consultation until the planning application stage.

5. Monitoring and follow-up should be addressed from the outset

Although monitoring may not always be mandatory, the handbook presents it as good practice because it can:

¿ Check whether predicted impacts and mitigation are effective;

¿ Inform future decisions and reassure local communities.

The scoping report says little about post-construction monitoring in relation to:

¿ Noise, shadow flicker, ecology, landscape and aviation lighting effects;

¿ Any agreed enhancement or compensation measures.

I ask that the Environmental Statement is required to include outline monitoring proposals, together with clear triggers for review and remedial action where necessary.

6. Decommissioning Phase

The scoping report makes no mention of the decommissioning phase despite this being of significant relevance given the size of the constructs.

- ¿ Phase Analysis: Identifies potential environmental, physical, and biological effects when turbines, foundations, and cables are removed.
- ¿ Mitigation Steps: Outlines ways to reduce negative outcomes like soil disruption, noise, and pollution during tear-down.
- ¿ Site Restoration: Details plans for returning the land or seabed back to its original condition
- ¿ Financial security: Governments require developers to set aside money in special funds, bonds, or guarantees before building starts. This ensures the public does not have to pay if the company goes out of business by the time the wind farm shuts down.

Conclusion

In conclusion, while the Padwick Wind Farm scoping report does identify several important assessment areas, including ecology, landscape and visual effects, heritage, noise and aviation, it does not appear to follow the full good-practice approach described in the Environment Agency's EIA scoping handbook. In particular, further attention is needed to:

- ¿ Socio economic, health, traffic, climate and air quality impacts;
- ¿ Cumulative and indirect effects;
- ¿ Alternatives, risk assessment and mitigation hierarchy;
- ¿ Stakeholder participation and local information;
- ¿ Monitoring and follow up;
- ¿ Decommissioning phase.

For these reasons, I respectfully request that Staffordshire Moorlands District Council:

1. Takes full account of the Environment Agency's EIA scoping handbook when preparing its scoping opinion; and
2. Requires the applicant to address the gaps and concerns identified above within the Environmental Statement.

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