

Response to Proposed Padwick Wind Farm EIA Scoping Proposal (Application Reference SMD/2026/0326)



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To: Planning Officer, Staffs Moorland District Council

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NOTICE AND DISCLAIMER

This response has been prepared and submitted by me, William David Johnson, in good faith to assist Staffordshire Moorlands District Council in its consideration of the Padwick Wind Farm EIA scoping request.

It reflects my honest understanding, observations and concerns, based on the information reasonably available to me at the date of submission, and has been prepared with reasonable care and diligence and to the best of my knowledge and belief. While every reasonable endeavour has been made to ensure its accuracy and completeness, no representation or warranty is given that it is free from error or omission, and it should not be treated as professional legal, planning, engineering or environmental advice.

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FOREWORD

I, **William David Johnson**, submit this response as the owner and occupier of **Barnfield, Bradnop, Staffordshire ST13 7NN**, in response to the Environmental Impact Assessment (EIA) Scoping Report prepared in support of the proposed **Padwick Wind Farm** (Planning Application Reference **SMD/2026/0326**).

The purpose of this document is to assist **Staffordshire Moorlands District Council** in preparing a robust and comprehensive Scoping Opinion that ensures the subsequent Environmental Statement contains sufficient information to enable the likely environmental effects of the proposed development to be properly understood, independently scrutinised and fairly assessed.

This response has been prepared in a constructive manner. It does not seek to determine the planning merits of the proposed wind farm at this stage, nor does it object to renewable energy development in principle. Rather, it identifies matters that, in my view, require further assessment or clarification within the Environmental Statement to ensure that potential environmental effects are evaluated in a transparent, proportionate and evidence-based manner.

Where appropriate, this document requests that additional baseline surveys, property-specific assessments, technical modelling and clearly defined mitigation measures are included within the Environmental Statement so that the Council, statutory consultees and members of the public can make informed observations on the eventual planning application.

It is hoped that the observations and recommendations contained within this response will assist the Council in defining an appropriate scope for the Environmental Impact Assessment and contribute towards a comprehensive and balanced assessment of the Proposed Development.

William David Johnson

Barnfield

Bradnop

Staffordshire ST13 7NN

1. Executive Summary

1.1 Introduction

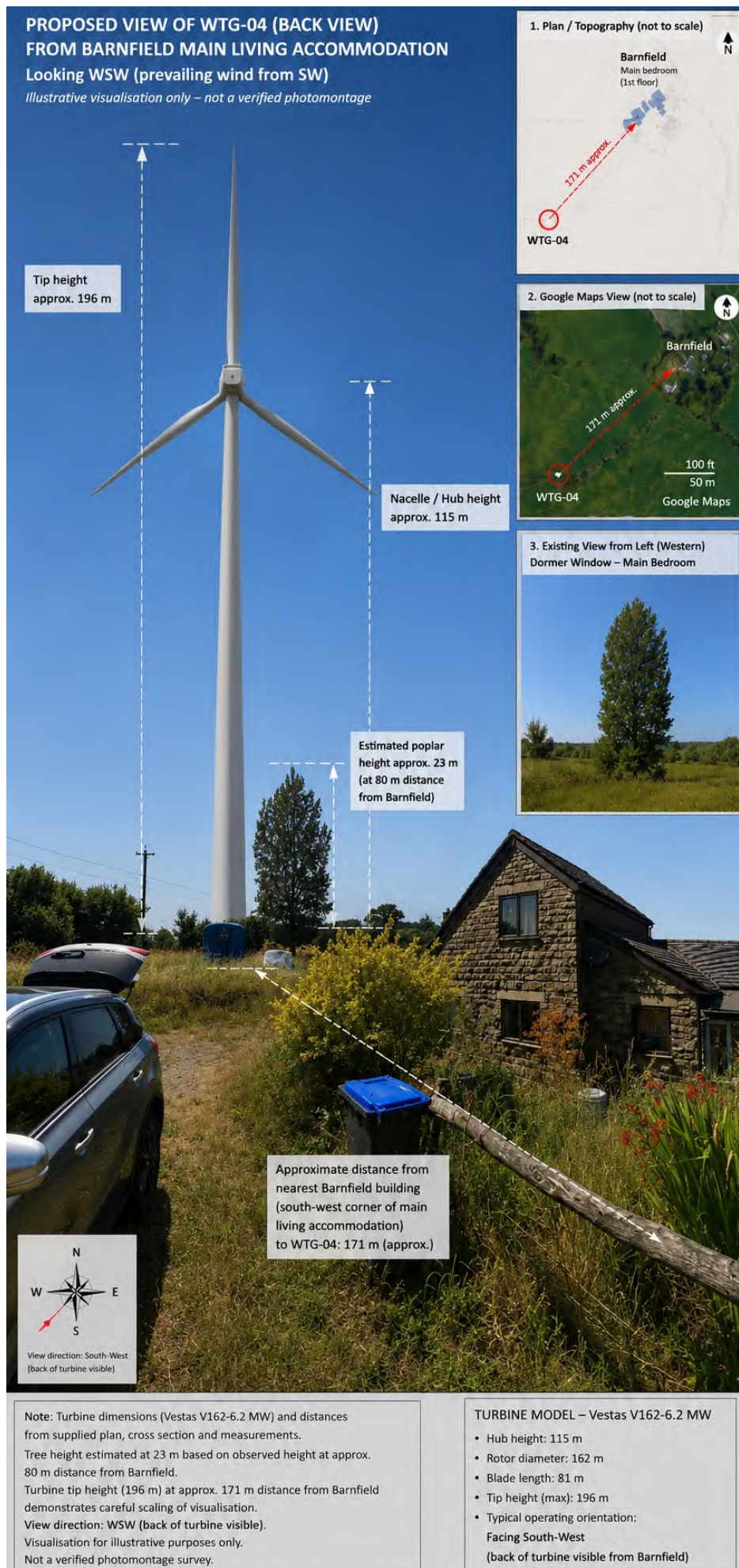
Barnfield farmhouse (ST13 7NN) is located in exceptionally close proximity to the proposed Padwick Wind Farm, with the nearest proposed turbine understood to be approximately **171 metres** from my property. In view of this unusually short separation distance, Barnfield (ST13 7NN) represents one of the most sensitive residential receptors potentially affected by the Proposed Development.

This response to the Environmental Impact Assessment (EIA) Scoping Report prepared by the Applicant for the proposed **8 turbine, 49.9 MW Padwick Wind Farm** is not an objection to renewable energy development in principle. Instead, it seeks to assist **Staffordshire Moorlands District Council** in issuing a robust and comprehensive Scoping Opinion that will ensure the subsequent Environmental Statement is proportionate, transparent, evidence-based and sufficiently detailed to enable informed decision-making.

I consider that the current Scoping Report does not yet demonstrate that all potentially affected residential receptors have been fully identified or that the proposed scope of assessment adequately reflects the circumstances of the nearest occupied dwellings. Particular attention should be given to residential visual amenity, operational and construction noise, shadow flicker, construction impacts, groundwater and drainage (including impacts on private water supply), ecology, public safety, traffic and abnormal loads, together with the cumulative effects arising from the interaction of these environmental topics.

For nearby residential receptors located within the zone where significant environmental effects are most likely to occur, **including my own property Barnfield (ST13 7NN)**, the Environmental Statement should provide **property-specific assessments supported by detailed evidence**. These assessments should include, where appropriate:

- Landscape and Visual Impact Assessment (LVIA);
- Residential Visual Amenity Assessment (RVAA);
- Operational and construction noise;
- Shadow flicker;
- Hydrological and Hydrogeological impacts;
- Construction traffic and abnormal load impacts;
- Dust and air quality;
- Public safety considerations;
- Cumulative environmental effects.



The above illustration shows just how dominating the proposed turbine WTG-04 would be with respect to not only my property, including topple risk (should it fall in my property's direction), but also the fact that it is c.171m from my end wall of my 1st floor bedroom.

Had I had more time, in addition to the illustration above of an external view of the proposed turbine, I would have generated a similar style illustration to show how the turbine will dominate my bedroom view out of the dormer windows.

You can see in the images below how close the poplar tree is (23m high at 80m away). A structure of 196m absolute height with a nacelle of 115m, c.92m above the poplar at the edge of my property shown in the image below would be extremely oppressive.



WSW view left dormer bedroom window



WSW view right dormer bedroom window



WSW view from open left dormer bedroom window

Given its exceptional proximity to the Proposed Development, **Barnfield, (ST13 7NN) should be treated as an individually assessed receptor throughout the Environmental Statement**, with its occupants and landholding.

This *also* includes the **Ipstones 35 Public Right of Way**, which runs through land owned by me and my neighbour (at Roughstone Hall Farm) and is adjacent to turbines WTG-05, WTG-04 and WTG-01. It should therefore be recognised as a **distinct environmental receptor** throughout the Environmental Statement - especially with respect to health and safety of the public in general as well as equestrian-specific activities in particular; (Appendices D, E, F, G, I and J refer for supporting information).

Appendix B refers for the Turbine WTG-04 topple section (Sammons Architectural Limited Ref. 2025-3038-02). This shows the **worst case arc of failure should** WTG-04 fall ENE towards Barnfield farmhouse with the turbine tip at its highest point.

The Environmental Statement should therefore include accurate surveyed distances, comprehensive baseline information, transparent modelling, verified visualisations, construction management proposals and clearly defined mitigation measures that can be independently scrutinised.

The principal purpose of this submission is to identify matters that should be expressly required within the Environmental Statement. These include property-specific Residential Visual Amenity Assessments where justified, receptor-specific acoustic modelling, transparent identification of all residential receptors, assessment of the combined effects of all eight proposed turbines, consideration of local topography and hydrogeology, and full justification of all assessment methodologies and assumptions.

I respectfully request that the Council's Scoping Opinion requires the Applicant to undertake additional work where necessary so that decision-makers, statutory consultees and affected residents have sufficient technical evidence upon which to assess the planning application.

This document has also been prepared so that it may be understood by any subsequent decision-maker or reviewer, including the Planning Inspectorate or the Secretary of State should the application become subject to appeal or central government determination. Its objective is not to prejudge the planning outcome but to improve the quality, completeness and transparency of the Environmental Statement.

1.2 Drafting errors in EIA Scoping Document site map and missing files on SMDC planning portal

1.21 Barnfield site map location obscured by WTG04 turbine label

Please see the diagram below which shows where the WTG-04 turbine label on the map completely obscures my property location; (please note the 'WTG-04' at this location may be a transposition error from the Applicant as there are 2 turbines indicated with the same WTG-04 title indicated (and there is no WTG-08 turbine shown in this application which is for 8 turbines). Therefore it is difficult for me to know from this drafting error, (which completely obscures my property on the Applicant's EIA Scoping Document site map) as to whether they are or were even aware of the existence of my property when they proposed the location of Turbine WTG-04 at all. in addition to all of the reasonable requests I have made to SMDC throughout this document, this issue of my property being obscured on the site map is above all one of if not the most urgent issues I would like clarification and assurance on in a Scoping Opinion.





1.22 Parts 2 and 3 of EIA Scoping Documents not available on SMDC planning portal

Please see the table below which indicates when clicking on the EIA Scoping report Pt 2 download link, it links to downloading of Fig. 4.1 (topography map). When clicking on the link to download the EIA Scoping report Pt 3, a 'server error' message display occurs. There are several other inaccuracies or omissions of documents and/or information across the report but this section 1.2 (namely points 1.21 and 1.22) cover the most important issues with the Applicant's documents that make it difficult for me to respond completely to much of the information about this project as it remains still very uncertain for the reasons provided.

Date uploaded	Documents stated as available online SMDC Planning Portal	Comments
07/07/2026	26274 Padwick Windfarm EIA Scoping Report v2.0 issued part 1	Present online
07/07/2026	Figure 1.1 Site Location.	Present online
07/07/2026	Figure 2.1 250117 LAYOUT N163-6.8MW	Present online
07/07/2026	26274 Padwick Windfarm EIA Scoping Report v2.0 issued part 2	Links to figure 4.1 topography not a part 2
07/07/2026	26274 Padwick Windfarm EIA Scoping Report v2.0 issued part 3	Fails to load - error server error i.e. no part 3
08/07/2026	Figure 4.1 Topography	Present online
08/07/2026	Figure 4.2 - Landscape Designations 1	Present online
08/07/2026	Figure 4.3 - Background ZTV Compressed	Present online
14/07/2026	Public Comment B.Hamilton 14.07.2026	Present online

1.3 Human Health and Wellbeing

Barnfield is occupied by residents, including individuals with pre-existing health conditions that may increase sensitivity to prolonged environmental disturbance. While this submission does not seek to draw medical conclusions regarding the Proposed Development, I respectfully request that the Environmental Statement includes a proportionate assessment of potential

effects on human health and wellbeing, including sleep disturbance, construction-related impacts, operational noise, shadow flicker, stress, cumulative environmental effects and how these may impact residential receptors with common health challenges such as cardiovascular disease, neurological conditions and autoimmune disorders. These are common examples of conditions which can all be impacted by stress related disturbances to and impacts on immune and neurological function. Any assessment should identify appropriate mitigation where significant effects on nearby residential receptors are reasonably foreseeable.

Accordingly, I respectfully request that the Council's Scoping Opinion requires the Environmental Statement to include a proportionate assessment of potential human health and wellbeing effects arising from both the construction and operational phases of the Proposed Development. This assessment should consider, where relevant:

- Operational and construction noise, including potential sleep disturbance;
- Shadow flicker;
- Construction traffic and associated disruption;
- Dust and air quality;
- Visual dominance and residential amenity;
- Stress and psychological wellbeing arising from prolonged construction activity and significant environmental change;
- Cumulative effects where multiple environmental factors may interact.

The assessment should identify appropriate mitigation measures wherever significant adverse effects are reasonably foreseeable and should give particular consideration to nearby residential properties located in exceptionally close proximity to the Proposed Development, including Barnfield (ST13 7NN).

1.4 Principal Recommendations

I respectfully request that the Council's Scoping Opinion requires the Environmental Statement to:

- Identify and assess all nearby residential receptors individually where significant environmental effects are reasonably foreseeable;
- Recognise **Barnfield (ST13 7NN)** as a named, property-specific receptor owing to its exceptional proximity to the Proposed Development, in particular Turbine WTG-04;
- As a discrete assessment separate from the LVIA, undertake a property-specific Residential Visual Amenity Assessment (RVAA) supported by verified visualisations and prepared to Landscape Institute TGN 2/19, with **Barnfield (ST13 7NN)** individually named, and addressing night-time amenity and aviation obstruction lighting as a discrete matter;

- Provide receptor-specific operational and construction noise modelling requiring **Barnfield (ST13 7NN)** to be a background sound monitoring location and to be individually listed by grid reference in the operational noise limit tables attached to any noise condition, and require site-specific noise limits to be set below the total noise assessment criteria in accordance with paragraph 2.45 of the 2026 DESNZ guidance Assessment and Rating of Wind Turbine Noise (ARWTN), which replaced ETSU-R-97
- Assess shadow flicker modelling on a site-specific basis for my property, reporting predicted hours per year and minutes per day, with window positions and orientations mapped.
- Assess the combined and cumulative effects of all eight turbines on individual residential receptors;
- Assess construction traffic, abnormal loads, dust, vibration and public safety impacts affecting nearby residents and users of **Ipstones 35 Public Right of Way**; (see Appendices D & F for site route photos and information on Upgrading Application from Public Footpath No. 002369).
- Require the definitive legal status of every PRoW crossing or adjacent to the Site to be confirmed against the Definitive Map, and require Ipstones 35 to be assessed on the basis of the pending claimed status; (Appendix I refers for the PRoW map of the proposed site area)
- Assess *in particular* **equestrian safety** against British Horse Society guidance, recognising the proposed proximity of Turbines WTG-05, WTG-04 & WTG-01 to Ipstones 35 and the route's documented equestrian use a pending bridleway reclassification (Appendices D, E, F, G, I & J refer);
- Require a proportionate Human Health and Wellbeing Assessment addressing construction and operational impacts on nearby residential receptors, including cumulative effects along with appropriate mitigation.
- Provide transparent methodologies, assumptions, baseline data and modelling for every technical assessment;
- Demonstrate how consultation has informed the evolution of the project and the development of mitigation measures;
- Provide clear, enforceable and proportionate mitigation together with post-construction monitoring where appropriate.
- It is noted that no oversailing easement or wayleave has been granted over any of the titles mentioned in Section 1.51 below and treat the deliverability of the scheme as designed as a material consideration. In particular I direct specific attention to my property - Title SF640979 and the apparent oversailing indicated by turbine WTG-04; (sub-Appendix H1 refers).

1.5 Description of the Affected Property

Illustrative Boundary of My Land

Appendix H contains details of each Land Registry record for the 4 land packages I own as described in overview in section 1.51. The overall boundary (approx. 37 acres) is shown below. Also shown is the route of Ipstones 35 Public Right of Way across my land and the land of my neighbour (Roughstone Hall Farm).



Boundary map of land packages owned by me
(Ipstones 35 PRow also shown)

1.51 Summary of Barnfield titles

- **SF342742**-farmhouse buildings and land - approx 8 acres
- **SF 479074**- land adjoining Barnfield - approx 3 acres
- **SF527786** -land to the E of Barnfield - approx 5 acres
- **SF 640979** - land adjoining Barnfield (part of Apesford farm) - approx 21 acres

Access is by private right of way (by long use and by documentation) over parts of Padwick farm.



Access to Barnfield (ST13 7NN): Entrance onto Padwick Farm land



Access to Barnfield (ST13 7NN): Turbine WTG-05 location to the left, Barnfield to the right



Access to Barnfield (ST13 7NN): Entrance to Barnfield land

(Note: Ipstones 35 bridle path goes to the right the other side of the gate)

My property has a private water supply from a bore hole, mains electricity, septic tank drainage and no gas.

My property comprises a stone farmhouse, block built double garage and workshop, stone out buildings, and a block built shippon (constructed 1940/50) with tying for 17 cows.

2. Summary Recommendations & Conclusions: Introduction, Site Description and Proposed Development

2.1 Introduction

My summary recommendations arising from a critical review of Padwick Wind Farm EIA Scoping Document's Introduction, Site Description and Proposed Development are shown below in sections 2.2, 2.3 and 2.4. These are drawn from the detailed assessments provided in Appendix A sub-Appendices A1, A2 and A3 respectively.

2.2 Critical Review of the Introduction (sub-Appendix A1 refers)

Clarification of Assumptions, Design Envelope and Project Parameters

I consider that the Introduction provides an appropriate overview of the proposed development and correctly recognises the need for an Environmental Impact Assessment.

However, the Scoping Opinion should require the Environmental Statement to:

1. Clearly define the complete design envelope.
2. Identify all assumptions used within each technical assessment.
3. Confirm that all assessments are undertaken using realistic worst-case parameters.
4. Clearly identify all residential receptors.
5. Provide sufficient technical information to enable independent scrutiny of the Applicant's assessments.

2.3 Critical Review of the Site Description (sub-Appendix A2 refers)

I consider that the Site Description provides an appropriate overview of the proposed development area. However, the Environmental Statement should contain a substantially more detailed baseline description to ensure that all subsequent environmental assessments are based upon an accurate understanding of the receiving environment.

In particular, the Council's Scoping Opinion should require:

1. A comprehensive topographical baseline.
2. A complete schedule of residential receptors.
3. Detailed assessment of public rights of way and recreational users.
4. Comprehensive hydrological and hydrogeological baseline surveys.

5. Full identification of environmental constraints.
6. Transparent presentation of all baseline datasets and survey methodologies

2.4 Critical Review of the Proposed Development (sub-Appendix A3 refers)

Identification of Turbine Model, Design Envelope, Sound Power Data and Aviation Lighting Assumptions

I respectfully request that Staffordshire Moorlands District Council requires the Applicant to include within the Environmental Statement:

1. A clearly defined worst-case design envelope.
2. Identification of the proposed turbine model, or the range of turbine models encompassed by the design envelope.
3. Certified sound power data and associated acoustic assumptions.
4. Full details of the proposed aviation lighting strategy.
5. Demonstration that all environmental assessments are based upon identical design assumptions.
6. Clear justification where any assessment departs from the adopted worst-case design envelope.

3. Summary Recommendations & Conclusions: Material Planning Policy and Methodology Considerations

3.1 Introduction

My summary recommendations and/or conclusions of a critical review of Padwick Wind Farm EIA Scoping Document's Material Planning Policy and Methodology Considerations are shown below in section 3.2. These are drawn from the detailed assessments provided in Appendix A, sub-Appendix A4.

3.2 Recommendations (sub-Appendix A4 refers)

Recommended Requirement for the Scoping Opinion

I respectfully request that the Council requires the Environmental Statement to:

1. Use the most current legislation, Government policy and recognised professional guidance applicable at the time of submission.
2. Identify all guidance relied upon, including publication dates and revision numbers.
3. Fully justify the methodology adopted for each technical assessment.
4. Clearly explain all assumptions and limitations.
5. Demonstrate consistency between technical disciplines.
6. Describe survey methodologies, modelling techniques and quality assurance procedures.
7. Identify uncertainties and explain their potential influence upon the assessment.
8. Provide sufficient technical information to enable independent review of all assessment methodologies.

4. Summary Recommendations & Conclusions: Proposed Landscape & Visual Impact Assessment

4.1 Introduction

My summary recommendations and/or conclusions arising from a critical review of Padwick Wind Farm EIA Scoping Document's Proposed Landscape & Visual Impact Assessment are shown below in section 4.2. These are drawn from the detailed assessments provided in Appendix A sub-Appendix A5.

4.2 Critical Review of the Proposed Landscape & Visual Impact Assessment (sub-Appendix A5 refers)

Critical Review – Landscape and Visual Impact Assessment (LVIA)

I respectfully request that Staffordshire Moorlands District Council requires the Environmental Statement to include:

1. A comprehensive Landscape and Visual Impact Assessment prepared using current recognised professional guidance.
2. A transparent methodology for selecting representative viewpoints.
3. Individual residential viewpoints for the nearest occupied dwellings, including the my property if confirmed as one of the nearest residential receptors.
4. Surveyed and verified wireline illustrations for each residential viewpoint.
5. Verified photomontages prepared to recognised professional standards.
6. A comprehensive Residential Receptor Schedule identifying all occupied dwellings within the assessment area.
7. Clear justification where any residential property is excluded from detailed assessment.
8. Seasonal landscape assessment.
9. Assessment of night-time visual effects arising from aviation lighting.
10. Full disclosure of survey methodologies, software, assumptions and quality assurance procedures.

5. Summary Recommendations & Conclusions: Residential Receptors and Residential Visual Amenity Assessment (RVAA)

5.1 Introduction

My summary recommendations and/or conclusions arising from a critical review of Padwick Wind Farm EIA Scoping Document's Proposed Residential Receptors and Residential Visual Amenity Assessment (RVAA) are shown below in section 5.2. These are drawn from the detailed assessments provided in Appendix A sub-Appendix A6.

5.2 Residential Visual Amenity Assessment (sub-Appendix A6 refers)

Property-Specific Residential Visual Amenity Assessment (RVAA) – Barnfield Farmhouse, Bradnop, ST13 7NN.

I respectfully request that Staffordshire Moorlands District Council requires the Environmental Statement to:

1. Identify **Barnfield, Bradnop, ST13 7NN** as an individual residential receptor.
2. Undertake a dedicated **Residential Visual Amenity Assessment** for the property.
3. Assess the cumulative visual influence of all proposed Padwick Wind Farm turbines upon the residential amenity of Barnfield (ST13 7NN).
4. Prepare verified wirelines and photomontages from the principal internal and external residential viewpoints.
5. Assess seasonal variation and, where applicable, the effects of aviation lighting during hours of darkness.
6. Explain and justify the methodology adopted, with reference to the current Landscape Institute guidance.

Conclusion

Given Barnfield (ST13 7NN)'s apparent proximity to the proposed development and the potential for substantial changes to the occupants' visual environment, I consider that a dedicated Residential Visual Amenity Assessment is necessary to ensure that the Environmental Statement provides the decision-maker with a robust and transparent assessment of likely significant effects.

I therefore respectfully request that the Council's Scoping Opinion expressly requires a **property-specific RVAA for Barnfield (ST13 7NN)**, rather than relying solely on representative residential viewpoints selected elsewhere within the study area.

6. Summary Recommendations & Conclusions: Noise, Acoustics & Vibration Assessment

6.1 Introduction

My summary recommendations and/or conclusions arising from a critical review of Padwick Wind Farm EIA Scoping Document's Proposed Noise, Acoustics & Vibration Assessment are shown below in section 6.2. These are drawn from the detailed assessments provided in Appendix A sub-Appendix A7.

6.2 Critical Review of the Proposed Noise Acoustics & Vibration Assessment (Appendix A7 refers)

I respectfully request that Staffordshire Moorlands District Council requires the Environmental Statement to include:

1. Property-specific operational noise predictions for all principal residential receptors, including **Barnfield (ST13 7NN)**.
2. A clear justification for the selection and representativeness of baseline monitoring locations.
3. Full disclosure of all acoustic modelling assumptions, software, input data and uncertainty factors.
4. Certified turbine sound power data based upon the proposed turbine or worst-case design envelope.
5. Predictions showing both individual turbine contributions and the combined logarithmic noise from all eight turbines operating simultaneously.
6. Assessment of a range of operational scenarios, including realistic worst-case conditions.
7. A description of proposed post-construction noise validation and complaint investigation procedures.

Conclusion

I consider that operational noise has the potential to represent one of the principal environmental effects of the proposed development for nearby residents. The Environmental Statement should therefore provide sufficient receptor-specific detail, transparent modelling assumptions and comprehensive assessment of combined turbine effects to enable the Council, statutory consultees and affected residents to understand and independently scrutinise the predicted acoustic impacts before any planning decision is made.

7. Summary Recommendations & Conclusions: Shadow Flicker Assessment

7.1 Introduction

My summary recommendations and/or conclusions arising from a critical review of Padwick Wind Farm EIA Scoping Document's Proposed Shadow Flicker Assessment are shown below in section 7.2. These are drawn from the detailed assessments provided in Appendix A sub-Appendix A8.

7.2 Critical Review of the Proposed Shadow Flicker Assessment (Appendix A8 refers)

Conclusion

I consider that shadow flicker has the potential to materially affect the residential amenity of nearby properties if not appropriately assessed and mitigated and in particular my own. A robust, transparent and property-specific assessment is therefore essential to ensure that the Environmental Statement provides the Local Planning Authority with sufficient information to understand the nature, extent and significance of any likely effects before determining the planning application. In particular, where an occupied dwelling such as **Barnfield (ST13 7NN)** is among the nearest residential receptors to the proposed development, the assessment should move beyond generic modelling and provide a detailed evaluation of the actual experience likely to be encountered by the occupants, together with any mitigation necessary to avoid or minimise adverse effects.

8. Summary Recommendations & Conclusions: Ecology Assessment

8.1 Introduction

My summary recommendations and/or conclusions arising from a critical review of Padwick Wind Farm EIA Scoping Document's Proposed Ecology Assessment are shown below in section 8.2. These are drawn from the detailed assessments provided in Appendix A sub-Appendix A9.

8.2 Critical Review of the Proposed Ecology Assessment (Appendix A9 refers)

I respectfully request that Staffordshire Moorlands District Council requires the Environmental Statement to include:

1. A comprehensive Ecological Impact Assessment prepared in accordance with current recognised ecological guidance.
2. Complete baseline habitat mapping and ecological receptor identification.
3. Robust seasonal ecological surveys undertaken at appropriate times of year for all relevant habitats and protected species.
4. Full justification where any ecological receptor or protected species is scoped out of assessment.
5. Assessment of construction, operational and decommissioning ecological effects.
6. A comprehensive cumulative ecological assessment considering existing, consented and reasonably foreseeable developments.
7. Full disclosure of survey methodologies, assumptions and limitations.
8. Detailed mitigation, compensation and biodiversity enhancement proposals.
9. A long-term ecological monitoring and adaptive management programme.

Conclusion

I consider that the ecological effects of the proposed development cannot be robustly assessed without a complete understanding of the site's seasonal ecological characteristics and its role within the wider ecological landscape. The Council's Scoping Opinion should therefore require an Environmental Statement supported by comprehensive multi-season survey data, transparent assessment methodologies and a thorough cumulative ecological assessment. This approach will provide the Local Planning Authority, statutory consultees and the public with confidence that decisions are based upon a sound and proportionate ecological evidence base, consistent with the objectives of the EIA Regulations and current ecological best practice.

9. Summary Recommendations & Conclusions: Hydrology & Hydrogeology Assessment

9.1 Introduction

My summary recommendations and/or conclusions arising from a critical review of Padwick Wind Farm EIA Scoping Document's Proposed Hydrology & Hydrogeology Assessment are shown below in section 9.2. These are drawn from the detailed assessments provided in Appendix A sub-Appendix A10.

9.2 Critical Review of the Proposed Hydrology & Hydrogeology Assessment (Appendix A10 refers)

I respectfully request that Staffordshire Moorlands District Council requires the Environmental Statement to include:

1. A comprehensive geological, hydrogeological and hydrological baseline assessment.
2. Site-specific ground investigation data sufficient to support both engineering design and environmental assessment.
3. A detailed assessment of the effects of turbine foundations, excavations and associated infrastructure on groundwater flow and recharge.
4. A comprehensive assessment of construction-phase drainage, earthworks and excavation impacts.
5. An assessment of potential effects on private water supplies, springs, groundwater-dependent habitats and surface water bodies.
6. A detailed Surface Water Drainage Strategy incorporating sustainable drainage principles and climate change allowances.
7. A Water Quality Assessment addressing pollution prevention and sediment control.
8. Long-term groundwater and surface water monitoring proposals.
9. Full disclosure of all assumptions, modelling methodologies and uncertainties.
10. A dedicated Private Water Supply Risk Assessment (PWSRA) for any private water supply located within the zone of potential influence of the Proposed Development.
11. Property-specific hydrogeological investigations, including source–pathway–receptor analysis and hydrogeological trace mapping where appropriate, for the private water supply serving Barnfield (ST13 7NN).

12. Independent baseline and post-construction monitoring of private water supply quality, quantity and reliability, funded by the Applicant, together with clearly defined contingency, remediation and compensation arrangements should adverse effects be identified.
-

Conclusion

I consider that the proposed development involves extensive ground disturbance, substantial reinforced concrete foundations and associated infrastructure that have the potential to influence groundwater, drainage patterns and surface water systems if not carefully designed and managed.

Of particular concern is my own private water supply serving Barnfield, (ST13 7NN), which is a borehole sunk c.8 years ago approximately 100 metres from my property. The proximity of a proposed turbine to this supply gives rise to legitimate concerns regarding both temporary impacts during construction and commissioning, and permanent effects throughout the anticipated 35-year operational life of the wind farm.

Accordingly, the Environmental Statement should not rely solely upon site-wide hydrogeological assessments. It should also include the hydrogeological equivalent of a property-specific Residential Visual Amenity Assessment, namely a dedicated Private Water Supply Risk Assessment supported by detailed hydrogeological investigations, source–pathway–receptor analysis, groundwater flow modelling and, where appropriate, hydrogeological trace mapping specific to Barnfield, (ST13 7NN).

Furthermore, independent baseline monitoring of my private water supply should be undertaken before any site preparation, enabling works or construction activities commence, establishing a robust reference against which any subsequent changes in water quality, water quantity or supply reliability can be objectively measured. The Environmental Statement should also identify clear mitigation, monitoring, remediation and compensation arrangements should the Proposed Development adversely affect this private water supply.

The Council's Scoping Opinion should therefore require sufficient technical information to enable these matters to be independently scrutinised before any planning decision is taken, ensuring that the long-term security and integrity of nearby private water supplies are fully protected.

10. Summary Recommendations & Conclusions: Proposed Cultural Heritage Assessment

10.1 Introduction

My summary recommendations and/or conclusions arising from a critical review of Padwick Wind Farm EIA Scoping Document's Proposed Cultural Heritage Assessment are shown below in section 10.2. These are drawn from the detailed assessments provided in Appendix A sub-Appendix A11.

10.2 Critical Review of the Proposed Cultural Heritage Assessment (Appendix A11 refers)

Critical Review of Direct and Setting Impacts on Heritage Assets.

I respectfully request that Staffordshire Moorlands District Council requires the Environmental Statement to include:

1. A comprehensive Cultural Heritage Assessment supported by current Historic England guidance and recognised professional practice.
 2. A complete baseline inventory of designated and non-designated heritage assets.
 3. A detailed assessment of direct impacts arising from excavations, foundations and associated infrastructure.
 4. A comprehensive assessment of impacts upon the setting and significance of all heritage assets that may be affected.
 5. Property-specific assessment of designated assets where significant setting effects are reasonably foreseeable.
 6. Verified viewpoints, wirelines and photomontages for heritage assets where setting contributes materially to significance.
 7. A detailed assessment of impacts upon historic landscape character.
 8. A cumulative heritage assessment considering existing, consented and reasonably foreseeable developments.
 9. Full disclosure of methodologies, assumptions, survey limitations and professional judgements.
-

Conclusion

I consider that the Cultural Heritage Assessment should extend beyond identifying archaeological remains within the development site and should provide a robust assessment of both direct physical impacts and indirect effects upon the setting and significance of heritage assets. Given the exceptional scale of the proposed turbines and the acknowledged potential for significant visual effects on designated heritage assets, the Council's Scoping Opinion should require a comprehensive, transparent and evidence-based assessment that enables the significance of any harm to be properly understood before the planning application is determined.

11. Summary Recommendations & Conclusions: Proposed Transport & Construction Impact Assessment

11.1 Introduction

My summary recommendations and/or conclusions arising from a critical review of Padwick Wind Farm EIA Scoping Document's Proposed Cultural Heritage Assessment are shown below in section 11.2. These are drawn from the detailed assessments provided in Appendix A sub-Appendix A12.

11.2 Critical Review of the Proposed Transport & Construction Impact Assessment (Appendix A12 refers)

Assess Abnormal Loads, Construction Traffic, Noise, Dust and Road Safety.

I respectfully request that Staffordshire Moorlands District Council requires the planning application to include:

1. A comprehensive Transport Assessment supported by current traffic survey data.
 2. A detailed Abnormal Loads Assessment, including route validation, swept-path analysis and bridge assessments.
 3. A Construction Traffic Management Plan addressing construction logistics, abnormal load movements and community safety.
 4. A receptor-specific assessment of construction noise affecting nearby residential properties.
 5. A detailed construction dust assessment supported by mitigation and monitoring proposals.
 6. A Road Safety Assessment considering motorists, pedestrians, cyclists, equestrians, agricultural vehicles and emergency services.
 7. A comprehensive assessment of impacts upon Public Rights of Way and recreational users.
 8. A cumulative assessment of construction traffic arising from other consented and reasonably foreseeable developments.
 9. Full disclosure of assessment methodologies, assumptions and uncertainties.
-

Conclusion

I consider that the construction phase of the Proposed Development has the potential to generate significant temporary effects through abnormal load deliveries, increased Heavy Goods Vehicle movements, construction noise, dust emissions and changes to highway safety. While the Scoping Report proposes that these matters be addressed outside the Environmental Statement through a Transport Assessment and associated management plans, the Council's Scoping Opinion should ensure that these supporting documents provide sufficient technical detail to enable a robust assessment of likely significant effects upon residents, road users, Public Rights of Way users and the wider community before any planning decision is made. In particular, the assessment should demonstrate that construction activities can be undertaken safely, with appropriate mitigation, and without giving rise to unacceptable impacts on local amenity or highway safety.

12. Summary Recommendations & Conclusions: Proposed Aviation & Telecommunications Impact Assessment

12.1 Introduction

My summary recommendations and/or conclusions arising from a critical review of Padwick Wind Farm EIA Scoping Document's Proposed Cultural Heritage Assessment are shown below in section 12.2. These are drawn from the detailed assessments provided in Appendix A sub-Appendix A13.

12.2 Critical Review of the Proposed Aviation & Telecommunications Assessment (Appendix A13 refers)

Provide Evidence of Consultation and Mitigation.

I respectfully request that Staffordshire Moorlands District Council requires the Environmental Statement to include:

1. A comprehensive record of consultation undertaken with telecommunications operators, aviation authorities and statutory safeguarding bodies.
 2. Documentary evidence demonstrating how consultation has informed the design and layout of the Proposed Development.
 3. A detailed Telecommunications Assessment identifying infrastructure, safeguarding zones, consultation outcomes and residual effects.
 4. A comprehensive Aviation Assessment addressing radar, communications, navigation, surveillance systems, obstacle safeguarding and aviation lighting.
 5. A clear explanation of all mitigation measures considered, together with the reasons for selecting the preferred mitigation strategy.
 6. Evidence that mitigation has been agreed, where necessary, with the relevant telecommunications operators and aviation authorities.
 7. A post-construction monitoring and verification strategy for both telecommunications and aviation mitigation measures.
 8. A transparent schedule of consultation responses, Applicant actions and resulting design amendments.
 9. Full disclosure of assessment methodologies, assumptions, technical limitations and any remaining uncertainties.
-

Conclusion

I consider that the EIA Scoping Report correctly recognises the potential for operational wind turbines to affect telecommunications infrastructure and aviation operations and appropriately identifies consultation with relevant operators as a key element of the assessment process. However, consultation alone is not sufficient to demonstrate that environmental effects have been avoided or adequately mitigated. The Council's Scoping Opinion should therefore require the Environmental Statement to provide a clear and evidence-based audit trail showing how consultation informed the technical assessments, influenced the design of the Proposed Development, and resulted in effective and proportionate mitigation. Such transparency will enable the Local Planning Authority, statutory consultees and the public to understand not only the conclusions reached, but also the evidence and decision-making process that underpins them.

13. Summary Recommendations & Conclusions: Proposed Climate Change, Carbon Balance and Climate Resilience Assessment

13.1 Introduction

My summary recommendations and/or conclusions arising from a critical review of Padwick Wind Farm EIA Scoping Document's Proposed Cultural Heritage Assessment are shown below in section 13.2. These are drawn from the detailed assessments provided in Appendix A sub-Appendix A14.

13.2 Critical Review of the Proposed Climate Change, Carbon Balance and Climate Resilience Assessment

Present Transparent Carbon and Resilience Assessments.

I respectfully request that Staffordshire Moorlands District Council requires the Environmental Statement to include:

1. A comprehensive Whole-Life Carbon Assessment covering construction, operation, maintenance and decommissioning.
 2. A transparent calculation of the anticipated carbon payback period together with all underlying assumptions.
 3. A detailed assessment of embodied carbon associated with turbine foundations, access infrastructure and construction materials.
 4. An assessment of carbon losses or gains arising from land use change and disturbance of existing carbon stores, where relevant.
 5. A comprehensive Climate Change Resilience Assessment considering projected future climatic conditions over the operational life of the development.
 6. A clear description of climate adaptation measures incorporated into the design of the Proposed Development.
 7. Full disclosure of all methodologies, assumptions, emissions factors and sources of uncertainty.
 8. Appropriate monitoring and adaptive management proposals demonstrating how climate resilience will be maintained throughout the operational life of the wind farm.
 9. A transparent and auditable presentation of all carbon calculations and climate-related conclusions.
-

Conclusion

I consider that the Proposed Development's contribution to national decarbonisation objectives should be demonstrated through robust technical evidence rather than assumed solely because it generates renewable electricity. Whilst the Scoping Report appropriately identifies the wider policy context of climate change and renewable energy, it provides only limited information regarding the assessment of whole-life carbon performance and the long-term resilience of the development to future climatic conditions.

The Council's Scoping Opinion should therefore require the Environmental Statement to present a transparent, evidence-based Climate Change and Carbon Assessment that quantifies both the environmental benefits and the lifecycle environmental costs of the Proposed Development. This should include clear carbon accounting, assessment of climate resilience over the anticipated 35-year operational life, and sufficient supporting evidence to enable independent scrutiny by the Local Planning Authority, statutory consultees and the public.

14. Summary Recommendations & Conclusions: Proposed Assessment of Residential Amenity, Tourism and Local Community

14.1 Introduction

My summary recommendations and/or conclusions arising from a critical review of Padwick Wind Farm EIA Scoping Document's Proposed Assessment of Residential Amenity, Tourism and Local Community are shown below in section 14.2. These are drawn from the detailed assessments provided in Appendix A sub-Appendix A15.

14.2 Review of the Proposed Assessment of Residential Amenity, Tourism and Local Community

Assess Residential Amenity, Tourism and Local Community Impacts

I respectfully request that Staffordshire Moorlands District Council requires the Environmental Statement to include:

1. An integrated assessment of residential amenity considering visual effects, noise, shadow flicker, aviation lighting, traffic, dust and construction disturbance.
 2. Property-specific assessments for occupied dwellings located close to the Proposed Development, including Barnfield, Bradnop, ST13 7NN where confirmed as an affected receptor.
 3. A comprehensive assessment of impacts upon recreational users, Public Rights of Way and visitors to the Peak District National Park and surrounding countryside.
 4. An assessment of the potential effects of the Proposed Development upon the quality of the visitor experience and rural tourism.
 5. A balanced assessment of potential positive and adverse socio-economic effects supported by objective evidence.
 6. A cumulative assessment of the combined effects of environmental impacts upon residential amenity and local communities.
 7. Full disclosure of assessment methodologies, assumptions, consultation responses and sources of uncertainty.
 8. Clear mitigation proposals together with monitoring and community engagement arrangements where adverse effects are identified.
-

Conclusion

I consider that the Scoping Report appropriately identifies several environmental topics that will contribute to an understanding of residential amenity, including landscape and visual effects, noise, shadow flicker and construction impacts. However, by proposing that **Socio-Economic** and **Population and Human Health** are scoped out of the Environmental Impact Assessment, there is a risk that the Environmental Statement may not adequately explain how these individual environmental effects combine to influence the lived experience of nearby residents, recreational users and visitors.

The Council's Scoping Opinion should therefore require the Environmental Statement to provide a transparent, evidence-based and integrated assessment of residential amenity, tourism and local community impacts. This should draw together the findings of the individual technical assessments to demonstrate the overall effect of the Proposed Development on those who live, work and visit the area, thereby enabling the Local Planning Authority to reach a balanced and fully informed planning decision.

Appendices

Appendix	Document
A	Critical Review of the Proposed Padwick Wind Farm EIA Scoping Report - Details
A1	Critical Review of the Introduction
A2	Critical Review of the Site Description
A3	Critical Review of the Proposed Development
A4	Critical Review of the Planning Policy & Methodology
A5	Critical Review of the Landscape & Visual Impact Assessment
A6	Critical Review of the Residual Visual Amenity Assessment
A7	Critical Review of the Noise, Acoustics & Vibration
A8	Critical Review of the Proposed Shadow Flicker Assessment
A9	Critical Review of the Proposed Ecology Assessment
A10	Critical Review of Groundwater, Hydrology, Drainage, Excavation and Construction Impacts
A11	Critical Review of Heritage
A12	Critical Review of Transport & Construction
A13	Critical Review of Aviation & Telecommunications
A14	Critical Review of Climate Change
A15	Critical Review of Socio-Economic
B	Barnfield (ST13 7NN) – WTG-04 Turbine Cross Section
C	Barnfield, ST13 7NN & Roughstone Hall Farm – Topography & WTG-01 & WTG-04 Turbines Location Plan
D	Initial Site Photo Survey – PRoW-Bridle Path (Ipstones 35)
E	Site Map – Location Map of Proposed Turbine Locations
F	Ipstones 35 Bridle Path Application Details (00239)
G	British Horse Society Guidelines & Ipstones 35 PRoW
H	Land Titles Owned by William David Johnson
I	Padwick Wind Farm Public Rights of Way Map – Including Ipstones 35 highlighted
J	23/1/23 Letter Staffordshire County Council – Section 3 Application (Upgrading of Public Footpath 35, Ipstones)

Appendix A: Critical Review of the Proposed Padwick Wind Farm EIA Scoping Report – Details

The following sub-appendices of this Appendix A, namely A1-A15, each contain a section of detail of critical review of the proposed Padwick Wind Farm EIA Scoping Report carried out on my behalf and from my own perspective as owner of Barnfield (ST13 7NN).

Each section or sub-appendix of the overall (detailed) critical review end with conclusions. For ease of review, each section's conclusions have been transferred into the main body of this response document. Sub-Appendices A1 to A3 summary requests are detailed in Section 2 (sections 2.2, 2.3 and 2.4 respectively). Sub-Appendices A4 to A15 summary requests and conclusions are singularly transferred to and contained within sections 4 to 14 of this response document.

Appendix A1: Critical Review of the Introduction

Introduction

Chapter 1 – Critical Review of the Introduction

Clarification of Assumptions, Design Envelope and Project Parameters

1.1 Introduction

I welcome the Applicant's decision to voluntarily submit the Padwick Wind Farm proposal to the Environmental Impact Assessment (EIA) process and acknowledges that the Scoping Report has been prepared in accordance with Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Scoping Report states that the proposed development comprises eight wind turbines with a hub height of 115 metres, a maximum blade-tip height of 196 metres, a generating capacity of approximately 49.9 MW and an overall site area of approximately 148 hectares.

I agree that a project of this scale has the potential to give rise to significant environmental effects and therefore requires a comprehensive Environmental Statement.

However, several assumptions underpinning the proposed Environmental Statement are either undefined or insufficiently explained at the scoping stage. These should be clarified within the Council's Scoping Opinion.

1.2 Design Envelope

The Scoping Report identifies the principal dimensions of the proposed turbines but does not define the full design envelope upon which future environmental assessments will be based.

For example, the report does not currently identify:

- the proposed turbine manufacturer;
- the proposed turbine model;
- rated rotational speed;
- maximum tip speed;
- sound power levels;
- operational modes;
- aviation lighting specification;
- foundation dimensions;

- crane hardstanding dimensions;
- construction compounds;
- permanent substation design;
- battery storage (if proposed);
- construction working hours;
- abnormal load assumptions.

Without these parameters it is difficult for consultees such as me to understand the basis upon which subsequent assessments will be undertaken.

I therefore request that the Environmental Statement clearly defines the final design envelope and demonstrates that all technical assessments represent the realistic worst-case scenario.

1.3 Assumptions Used Throughout the Environmental Statement

The Scoping Report states that it provides an overview of the likely significant environmental effects and also identifies topics proposed to be scoped out where significant effects are considered unlikely.

I consider that every assumption used throughout the Environmental Statement should be explicitly identified, including assumptions relating to:

- construction methods;
- turbine operation;
- traffic generation;
- access routes;
- crane locations;
- temporary compounds;
- mitigation measures;
- operational lifespan;
- decommissioning methodology.

Each environmental chapter should clearly distinguish between measured data, modelled data and professional judgement.

1.4 Residential Receptors

The Introduction refers generally to likely environmental effects but does not explain how potentially affected residential receptors have been identified.

Given the importance of residential amenity throughout the Environmental Statement, I request that the Environmental Statement includes:

- a comprehensive schedule of every occupied dwelling within the relevant assessment areas;
- justification for selecting representative receptors;
- justification where any occupied dwelling is excluded from detailed assessment.

I consider my property will be confirmed to be one of the nearest (if not the nearest) occupied dwellings, and therefore it should be specifically identified as an individual receptor throughout the Environmental Statement.

1.5 Worst-Case Assessment

Good EIA practice requires environmental assessments to be undertaken on a realistic worst-case basis.

The Environmental Statement should therefore explain:

- which assumptions represent worst-case conditions;
- whether different turbine options have been assessed;
- whether all environmental topics have used the same design envelope;
- whether cumulative assumptions remain valid if the project design changes - for example does the Applicant intend to upgrade the wind turbines at a later date (repowering) up to the 100MW Nationally Significant Infrastructure Project (NSIP) capacity? If so what impact will this have on initial foundation design to accommodate that and what will be the revised environmental impact (LVIA and RVAA) of an upgraded power output to each turbine at some point in the 35 year wind farm life span?

Understanding this is particularly important for immediate and long term:

- operational noise;
- shadow flicker;
- landscape and visual effects;
- aviation lighting;
- public safety;

- residential visual amenity.
-

1.6 Transparency

The Introduction would benefit from a commitment that all datasets, modelling assumptions, input parameters and survey methodologies will be made available in sufficient detail to allow independent review by:

- Staffordshire Moorlands District Council;
- statutory consultees;
- affected residents;
- independent technical advisers.

Transparency is fundamental to an effective Environmental Impact Assessment and assists decision-makers in evaluating the robustness of the Applicant's conclusions.

Appendix A2: Critical Review of the Site Description

Site Description

Chapter 2 – Critical Review of the Site Description

2.1 Introduction

The Scoping Report provides a general description of the proposed development site, its location and surrounding landscape. This is appropriate for the purposes of introducing the project. However, I consider that the baseline description should be expanded in several important respects to ensure that the Environmental Statement is founded upon a comprehensive understanding of the receiving environment.

The Environmental Statement should demonstrate not only the physical characteristics of the site itself but also the environmental context within which the development would operate over its anticipated operational life.

2.2 Topography

The Scoping Report identifies the broad geographical setting of the proposed development but provides relatively limited discussion of how local landform may influence environmental effects.

I request that the Environmental Statement contains a detailed topographical assessment including:

- Digital Terrain Model (DTM) mapping.
- Contour mapping at appropriate intervals.
- Relative elevations of each turbine.
- Relative elevations of all nearby residential receptors.
- Cross-sections illustrating turbine visibility.
- Identification of ridges, valleys, depressions and escarpments.
- Areas of natural visual screening.
- Areas of acoustic screening.
- Local slope analysis.
- Existing woodland and hedgerow screening.

This information is important because local topography may materially influence:

- visual prominence;
- operational noise propagation;
- shadow flicker;
- drainage;
- groundwater movement;
- construction methodology.

A generalised site description alone is unlikely to provide sufficient information for robust assessment.

2.3 Residential Receptors

I consider that identification of residential receptors should form one of the central components of the Environmental Statement.

The Scoping Report refers generally to nearby residential properties but does not explain in sufficient detail:

- how receptors have been, would be or are being selected;
- why certain properties have been chosen as representative;
- whether all occupied dwellings have been identified; my property (Barnfield (ST13 7NN)) is obscured by (the northerly of the two erroneously duplicated) wind turbine referenced WTG04.
- the methodology used to determine assessment distances.

The Environmental Statement should therefore include:

- a schedule of every occupied dwelling within each assessment zone;
- property coordinates;
- separation distances to each turbine;
- orientation of principal elevations;
- principal living room windows;
- outdoor amenity areas;
- gardens;
- farmyards;

- working areas associated with agricultural properties.

For each receptor the Environmental Statement should identify:

- predicted visibility;
- number of visible turbines;
- horizontal field of view;
- vertical viewing angle;
- likely residential visual effects;
- predicted operational noise;
- predicted shadow flicker.

Where one dwelling experiences substantially greater affects than neighbouring properties it should receive an individual assessment rather than being treated as representative of a wider group.

As I expect my home to be confirmed to be among the nearest occupied dwellings, it should be identified as an individual receptor throughout the Environmental Statement, requiring an LVIA and subsequent RVAA.

2.4 Public Rights of Way

The Scoping Report identifies public rights of way within the vicinity of the site. However, greater detail should be provided regarding their recreational and visual importance.

The Environmental Statement should include:

- definitive rights-of-way mapping;
- promoted walking routes;
- permissive paths;
- bridleways – including the history of Ipstones 35 which passes through my and my neighbours land (at Roughstone Hall Farm). See Appendix D for a visual photographic record of some parts of this bridle path; (Appendices F, G, H & I also refer);
- cycle routes;
- local viewpoints;
- recreational destinations.

For each route the assessment should consider:

- duration of views;
- orientation of users;
- sequential views;
- cumulative visibility;
- changes in visual experience;
- interaction between landscape character and turbine visibility.

Temporary construction impacts affecting users should also be assessed.

2.5 Hydrology and Hydrogeology

The Scoping Report identifies water-related considerations but the I consider that further baseline information should be required.

The Environmental Statement should include:

2.51 Surface Water

- catchment boundaries;
- drainage pathways;
- ordinary watercourses;
- ponds;
- springs;
- existing flood risk.

2.52 Groundwater

- groundwater bodies;
- groundwater flow directions;
- aquifers;
- groundwater vulnerability;
- private water supplies;
- licensed abstractions.

2.53 Construction Effects

The Environmental Statement should assess:

- turbine foundation excavations;
- crane hardstandings;
- access roads;
- temporary compounds;
- cable trenches;
- dewatering requirements – temporary *as well as* permanent works
- concrete placement;
- pollution prevention.

Particular attention should be given to whether large reinforced concrete foundations could alter groundwater movement or local drainage patterns.

2.6 Environmental Constraints

The baseline description should identify all relevant environmental constraints affecting the proposed development.

These should include:

2.61 Ecological Constraints

- designated sites;
- protected species;
- priority habitats;
- ecological networks;
- ancient woodland;
- veteran trees.

2.62 Heritage Constraints

- listed buildings;
- scheduled monuments;
- conservation areas;

- historic landscapes.

2.63 Landscape Constraints

- National Character Areas;
- Landscape Character Areas;
- valued landscapes;
- important viewpoints.

2.64 Infrastructure Constraints

- overhead electricity lines;
- buried utilities;
- telecommunications;
- aviation safeguarding;
- pipeline easements.

2.65 Residential Constraints

The Environmental Statement should also identify:

- schools;
- hospitals;
- care homes;
- businesses;
- equestrian facilities;
- tourism assets.

2.7 Baseline Data

I request that all baseline information be supported by:

- survey dates;
- survey methodologies;
- GIS datasets;
- mapping scales;

- data limitations;
- assumptions.

The Environmental Statement should clearly distinguish:

- measured information;
- interpreted information;
- modelling assumptions.

Appendix A3: Critical Review of the Proposed Development

Proposed Development

3. Critical Review – Identification of Turbine Model, Design Envelope, Sound Power Data and Aviation Lighting Assumptions

3.1 Introduction

The Scoping Report identifies the principal physical characteristics of the proposed development, including eight wind turbines with a maximum hub height of 115 metres and a maximum blade-tip height of 196 metres. It is recognised that, at the scoping stage, the Applicant may not have selected the final turbine manufacturer or model.

Nevertheless, the Environmental Statement should be founded upon a clearly defined and technically robust **design envelope** that represents the realistic worst-case development against which all environmental effects are assessed.

Without a clearly defined design envelope, there is a risk that different environmental topics could be assessed using different assumptions, potentially reducing the consistency and reliability of the Environmental Impact Assessment.

3.2 Turbine Model

I acknowledge that the Applicant may wish to retain commercial flexibility when procuring wind turbines. However, the Environmental Statement should identify either:

- the proposed turbine manufacturer and model; or
- a clearly defined worst-case design envelope encompassing the range of turbines that may reasonably be installed.

The Environmental Statement should specify, as a minimum:

- manufacturer;
- model designation;
- rated electrical output;
- rotor diameter;
- blade length;
- hub height;

- maximum blade-tip height;
- maximum rotational speed;
- blade tip speed;
- cut-in and cut-out wind speeds;
- operational control strategy.

These parameters influence several environmental assessments, including landscape and visual effects, operational noise, shadow flicker and aviation safety.

3.3 Design Envelope

I request that the Council's Scoping Opinion requires the Applicant to define a single design envelope that is applied consistently throughout the Environmental Statement.

The design envelope should include:

- maximum turbine dimensions;
- maximum rotor diameter;
- maximum blade chord;
- turbine spacing;
- foundation dimensions;
- crane hardstanding areas;
- permanent access tracks;
- temporary construction compounds;
- electrical infrastructure;
- substation layout;
- underground cable routes;
- construction methodology;
- decommissioning assumptions.

The Environmental Statement should demonstrate that every environmental assessment has been undertaken using the same worst-case assumptions unless a different approach is fully justified.

3.4 Sound Power Data

Operational noise is one of the principal concerns for nearby residential properties.

Although detailed acoustic modelling is appropriately deferred until preparation of the Environmental Statement, I request that the Council's Scoping Opinion requires the Environmental Statement to include:

- the certified sound power level of the proposed turbine (or worst-case turbine);
- octave-band sound power spectra;
- tonal characteristics, where applicable;
- assumptions regarding amplitude modulation, if relevant;
- operational modes used within the modelling;
- uncertainty analysis;
- justification for any operational noise mitigation.

The Environmental Statement should also explain how the selected sound power data represent the worst-case operational scenario.

This information is necessary to enable independent review of the acoustic assessment and to ensure that receptor-specific predictions are based upon robust technical evidence.

3.5 Aviation Lighting

Given the proposed maximum blade-tip height of approximately 196 metres, the development may require aviation lighting in accordance with applicable aviation safeguarding requirements.

I request that the Environmental Statement clearly identifies:

- the proposed aviation lighting strategy;
- type of lighting;
- intensity;
- colour;
- flashing characteristics;
- operating regime;
- visibility controls (if proposed);
- any Aircraft Detection Lighting System (ADLS), if proposed.

The Environmental Statement should assess the potential effects of aviation lighting upon:

- nearby residential properties;
- landscape character;
- night-time visual amenity;
- dark skies;
- heritage assets;
- recreational receptors.

Where mitigation measures are proposed, these should be fully described and justified.

3.6 Consistency Between Technical Assessments

I request that the Environmental Statement demonstrates that:

- the Landscape and Visual Impact Assessment;
- Residential Visual Amenity Assessment;
- Noise Assessment;
- Shadow Flicker Assessment;
- Aviation Assessment;
- Public Safety Assessment; and
- all other technical chapters

have been prepared using identical turbine dimensions and consistent design assumptions.

Where assumptions differ between technical disciplines, the Environmental Statement should explain the reasons for those differences and demonstrate that no environmental topic has been assessed using parameters that underestimate potential effects.

Appendix A4: Critical Review of the Material Planning Policy & Methodology

Planning Policy & Methodology

4. Critical Review – Material Planning Policy, Guidance and Assessment

Methodology

4.1 Introduction

The Scoping Report outlines the legislative framework governing the proposed Environmental Impact Assessment and identifies the principal technical disciplines that will contribute to the Environmental Statement.

I acknowledge that the Scoping Report has been prepared to support a request for a Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

However, I consider that the Council's Scoping Opinion should expressly require the Environmental Statement to demonstrate that every technical assessment has been undertaken using the **most current legislation, national policy, planning guidance and recognised professional guidance** applicable at the time the Environmental Statement is submitted.

Environmental assessment methodologies continue to evolve. Consequently, methodologies that may have been considered appropriate when the Scoping Report was prepared may require updating before the Environmental Statement is completed.

4.2 Use of Current Guidance

The Environmental Statement should identify, for every technical discipline:

- all legislation relied upon;
- all Government policy;
- National Planning Policy Framework (NPPF) provisions;
- Planning Practice Guidance (PPG);
- statutory consultee guidance;

- recognised professional guidance;
- British Standards;
- internationally recognised technical standards where appropriate.

For each assessment chapter, the Environmental Statement should confirm:

- document title;
- publication date;
- edition or revision number;
- status (current, superseded or withdrawn).

Where guidance has been updated during preparation of the Environmental Statement, the Applicant should explain whether:

- the revised guidance has been adopted; or
- earlier guidance has been retained,

together with the reasons for that decision.

4.3 Justification of Assessment Methodologies

Each technical assessment should clearly explain:

- why the chosen methodology has been selected;
- whether alternative methodologies were considered;
- the limitations of the methodology;
- assumptions incorporated within the assessment;
- uncertainty associated with the results.

I consider that conclusions should not simply be presented as professional opinion but should demonstrate how those conclusions have been reached using transparent and reproducible methods.

4.4 Consistency Across Technical Disciplines

The Environmental Statement should demonstrate that all technical chapters are based upon a common set of project assumptions, including:

- turbine dimensions;
- operational characteristics;
- construction programme;
- site layout;
- mitigation measures.

Where assumptions differ between chapters, these differences should be explicitly identified and justified.

This will reduce the risk of inconsistent assessments between different environmental topics.

4.5 Baseline Data and Survey Methodologies

For every environmental topic, the Environmental Statement should explain:

- survey methodology;
- survey dates;
- seasonal coverage;
- weather conditions where relevant;
- survey limitations;
- quality assurance procedures.

Where modelling has been undertaken, the Environmental Statement should identify:

- software used;
- version number;
- modelling assumptions;
- calibration procedures;
- validation methodology.

I consider that sufficient technical information should be provided to enable independent review of the Applicant's assessments.

4.6 Assessment of Uncertainty

Environmental assessments inevitably contain uncertainty arising from assumptions, modelling techniques and future operational conditions.

The Environmental Statement should therefore identify:

- sources of uncertainty;
- sensitivity analyses where appropriate;
- confidence levels;
- limitations of available data.

Where uncertainty could materially influence the significance of predicted effects, this should be explicitly discussed.

4.7 Independent Review

I respectfully request that the Environmental Statement provides sufficient information to allow meaningful independent scrutiny by:

- Staffordshire Moorlands District Council;
- statutory consultees;
- affected residents;
- independent technical advisers.

The methodology adopted for each technical discipline should therefore be sufficiently transparent that the assessment process can be understood and, where appropriate, replicated.

Appendix A5: Critical Review of the Landscape & Visual Impact Assessment

Landscape & Visual Impact Assessment

5. Critical Review – Landscape and Visual Impact Assessment (LVIA)

5.1 Introduction

The Scoping Report proposes that a Landscape and Visual Impact Assessment (LVIA) will be undertaken to assess the likely landscape and visual effects arising from the proposed Padwick Wind Farm.

I agree that an LVIA is an essential component of the Environmental Statement. However, given the scale of the proposed development, the maximum blade-tip height of approximately 196 metres and the proximity of nearby residential properties, (especially mine at just approximately 170m away from turbine WTG04 (North)) the Council's Scoping Opinion should specify the minimum scope and content of that assessment.

I respectfully request that the Environmental Statement includes a comprehensive and transparent LVIA prepared in accordance with current recognised professional guidance and best practice and that I would ask SMDC to require my property, (Barnfield (ST13 7NN)), to be treated as a **primary residential visual receptor** rather than merely one of several representative receptors.

5.2 Landscape Baseline

The Environmental Statement should provide a detailed description of the existing landscape, including:

- National Character Areas;
- Landscape Character Areas;
- local landscape character assessments;
- topography;
- landform;

- vegetation;
- woodland;
- hedgerows;
- watercourses;
- settlement pattern;
- agricultural land use;
- existing built development;
- existing infrastructure.

The assessment should explain how these landscape characteristics contribute to landscape sensitivity and landscape value.

5.3 Comprehensive Viewpoint Selection

I consider that viewpoint selection represents one of the most important aspects of the LVIA.

The Environmental Statement should include viewpoints representing:

5.31 Public Receptors

- public rights of way;
- promoted walking routes;
- bridleways – for example key points along Ipstones 35.
- cycle routes;
- roads;
- villages;
- recognised viewpoints;
- heritage assets.

5.32 Residential Receptors

Individual viewpoints should be selected from:

- the nearest occupied dwellings (including mine);

- isolated farmhouses;
- residential gardens;
- principal elevations;
- principal living room windows;
- bedrooms where appropriate;
- domestic curtilage;
- farmyards.

Viewpoints should represent the actual experience of residents rather than solely publicly accessible locations.

5.4 Residential Viewpoints

I request that the Environmental Statement includes viewpoint photography from my property if it is confirmed to be one of the nearest occupied dwellings.

Photographs should be taken from:

- front elevation;
- rear elevation;
- side elevations;
- principal living room windows;
- kitchen;
- garden;
- patio;
- farmyard;
- principal access route.

Each viewpoint should be accurately surveyed and referenced.

5.5 Wirelines

I request that the Environmental Statement includes accurate wireline illustrations for each residential viewpoint.

Wirelines should identify:

- every proposed turbine;
- turbine numbering;
- hub height;
- blade-tip height;
- visible blade rotation envelope;
- visible proportion of each turbine;
- screening by landform;
- screening by vegetation.

The methodology used to prepare wirelines should be fully described.

5.6 Photomontages

I request that verified photomontages are produced for all principal residential viewpoints.

Photomontages should:

- be prepared using recognised professional standards;
- be accurately surveyed;
- be based upon verified photography;
- include viewing instructions;
- identify turbine numbers;
- identify principal landmarks;
- state viewing distance;
- identify field of view;
- identify camera specifications.

Where appropriate, enlarged images should also be provided illustrating the nearest turbines.

5.7 Residential Receptor Schedule

I consider that the Environmental Statement should contain a comprehensive **Residential Receptor Schedule**.

For every occupied dwelling within the assessment area the schedule should identify:

- property reference;
- grid reference;
- separation distance to each turbine;
- nearest turbine;
- number of visible turbines;
- orientation of principal elevations;
- orientation of principal living room windows;
- garden location;
- farmyard location (where applicable);
- visibility classification;
- requirement for Residential Visual Amenity Assessment.

Where a dwelling has been excluded from detailed assessment, the Environmental Statement should explain the reasons for that decision.

5.8 Assessment of Cumulative Visual Effects

The Environmental Statement should distinguish between:

- effects arising from the Padwick Wind Farm alone;
- cumulative effects with existing wind farms;
- cumulative effects with consented developments;
- cumulative effects with proposed developments where appropriate.

The methodology adopted should be clearly explained.

5.9 Seasonal Assessment

I request that the Environmental Statement considers seasonal variation, including:

- leaf-on conditions;
- leaf-off conditions;
- winter visibility;
- summer visibility.

Existing vegetation should not be assumed to provide permanent visual screening unless its long-term retention can reasonably be assured.

5.10 Night-time Assessment

If aviation lighting is proposed, the Environmental Statement should assess:

- visibility of aviation lights;
 - flashing characteristics;
 - cumulative lighting effects;
 - impacts upon residential receptors;
 - impacts upon landscape character;
 - impacts upon dark skies.
-

5.11 Quality Assurance

I request that the Environmental Statement identifies:

- photography standards adopted;
- survey methodology;
- GPS accuracy;
- camera calibration;

- software used;
- photomontage methodology;
- quality assurance procedures.

This information is necessary to enable independent review of the visual assessment.

Appendix A6: Critical Review of the Residual Visual Amenity Assessment

Residential Visual Amenity Assessment

6. Property-Specific Residential Visual Amenity Assessment (RVAA) – Barnfield Farmhouse, Bradnop, ST13 7NN

6.1 Introduction

The Scoping Report states that, in addition to the Landscape and Visual Impact Assessment (LVIA), a **Residential Visual Amenity Assessment (RVAA)** may be required for residential properties located within approximately 2 kilometres of the proposed development, in accordance with recognised Landscape Institute guidance.

I respectfully submit that the circumstances of **Barnfield**, Bradnop, Staffordshire, ST13 7NN, warrant a **property-specific Residential Visual Amenity Assessment** to be expressly required within the Council's Scoping Opinion.

This request is based on the property's apparent proximity to the proposed development, its relationship with the nearest turbine locations, and the potential for significant effects on the residential visual amenity experienced by the occupants.

6.2 Potentially Exceptional Residential Circumstances

Based on the information presently available, Barnfield (ST13 7NN) appears to:

- be one of the nearest occupied dwellings to the proposed development;
- lie within approximately 2 kilometres of all eight proposed turbines;
- be located approximately 170-200 metres from the nearest proposed turbine (subject to verification);
- have the potential to experience views towards multiple turbines from both the dwelling and its surrounding residential curtilage.

If confirmed during preparation of the Environmental Statement, these characteristics distinguish Barnfield (ST13 7NN) from many other residential properties within the wider assessment area and justify a dedicated assessment rather than reliance upon a representative residential viewpoint.

6.3 Requirement for an Individual Assessment

I respectfully request that Barnfield (ST13 7NN) is identified within the Environmental Statement as an **individual residential receptor**.

The assessment should not rely upon another dwelling being considered "representative" unless the Applicant can demonstrate that both properties experience materially similar visual conditions.

I consider that the visual experience of residents is highly site-specific and depends upon factors including:

- orientation of the dwelling;
- principal room locations;
- garden layout;
- farmyard activities;
- local topography;
- vegetation;
- intervening buildings;
- extent of visible turbine infrastructure.

These characteristics cannot necessarily be inferred from another nearby property.

6.4 Scope of the RVAA

I respectfully request that the Residential Visual Amenity Assessment for Barnfield (ST13 7NN) includes:

Internal Residential Views

Assessment from:

- principal living room windows;
- kitchen;
- dining room;
- study (if applicable);
- principal bedrooms where relevant.

External Residential Amenity

Assessment from:

- front garden;
- rear garden;
- patio or seating areas;
- domestic curtilage;
- farmyard;
- principal pedestrian access;
- vehicular entrance.

Daily Residential Experience

The assessment should consider the likely visual experience associated with:

- arriving at the property;
- leaving the property;
- routine domestic activities;
- outdoor recreation;
- gardening;
- agricultural activities associated with the dwelling.

6.5 Visual Assessment Material

I request that the Environmental Statement includes for Barnfield (ST13 7NN):

- accurately surveyed viewpoint photography;
- verified wireline drawings;
- verified photomontages;
- turbine numbering;
- hub heights;
- blade-tip heights;
- visibility envelopes;

- cumulative visibility of all eight proposed turbines;
- assessment of seasonal variation;
- assessment of daytime and, if aviation lighting is proposed, night-time conditions.

All visualisations should comply with recognised professional standards and include sufficient technical information to allow independent verification.

6.6 Relationship with the Landscape and Visual Impact Assessment

I consider that the RVAA should complement, rather than replace, the wider Landscape and Visual Impact Assessment.

The LVIA should continue to assess landscape character and public visual receptors across the wider study area.

The property-specific RVAA should focus exclusively upon the residential visual amenity experienced by the occupants of Barnfield (ST13 7NN).

Appendix A7: Critical Review of the Noise, Acoustics & Vibration Assessment

Noise, Acoustics & Vibration

7. Critical Review – Operational Noise and Vibration Assessment

7.1 Introduction

The Scoping Report confirms that a detailed Operational Noise Assessment will be undertaken as part of the Environmental Statement.

I agree that operational noise represents one of the principal environmental considerations associated with the proposed Padwick Wind Farm, particularly in relation to nearby residential properties.

I respectfully request that the Council's Scoping Opinion specifies the minimum technical information to be included within the Environmental Statement to ensure that the assessment is comprehensive, transparent and capable of independent review.

7.2 Receptor-Specific Noise Predictions

I consider that noise predictions should be presented on a **property-specific basis** rather than relying solely upon representative residential receptors.

For every occupied dwelling assessed, the Environmental Statement should identify:

- property reference and address;
- National Grid Reference;
- separation distance to each proposed turbine;
- nearest turbine identification;
- predicted operational noise level at the façade;
- predicted operational noise level within external residential amenity areas where appropriate;
- applicable assessment criterion;
- predicted margin of compliance.

Where one property experiences materially different predicted effects from neighbouring dwellings, it should be assessed individually rather than grouped within a representative receptor.

Given the apparent proximity of **Barnfield (ST13 7NN)** to the proposed development, I respectfully request that the property is assessed as an **individual residential receptor**.

7.3 Baseline Noise Monitoring

The Environmental Statement should provide a clear justification for the selection of all baseline monitoring locations.

For each monitoring position, the Applicant should explain:

- why the location has been selected;
- how it represents nearby residential receptors;
- local topography;
- nearby vegetation;
- surrounding land use;
- existing noise environment;
- any potential sources of atypical background noise.

The Environmental Statement should also include:

- monitoring duration;
- seasonal coverage;
- weather conditions;
- instrumentation specifications;
- calibration procedures;
- data validation methods;
- reasons for rejecting any monitoring data.

Where monitoring locations are not situated immediately adjacent to affected dwellings, the Applicant should demonstrate why the selected locations provide representative baseline conditions.

7.4 Noise Modelling Assumptions

I request that the Environmental Statement fully discloses all assumptions used within the acoustic modelling.

This should include, as a minimum:

- turbine manufacturer and model (or worst-case design envelope);
- certified sound power levels;
- octave-band sound power spectra;
- hub height;
- rotor diameter;
- blade rotational speeds;
- operational control modes;
- wind speed assumptions;
- atmospheric conditions;
- ground absorption values;
- topographical modelling;
- screening assumptions;
- uncertainty factors;
- software used;
- software version.

Where assumptions have been adopted that influence predicted noise levels, these should be clearly explained and justified.

7.5 Combined Turbine Effects

I consider that the Environmental Statement should clearly distinguish between:

- noise generated by each individual turbine; and
- the combined operational noise arising from all eight turbines operating simultaneously.

The Environmental Statement should therefore provide:

- predicted contribution from each turbine;
- logarithmic combination of all turbines;
- identification of the dominant noise source at each receptor;
- explanation of cumulative operational effects across the development.

Where multiple turbines contribute significantly to the predicted noise environment at a receptor, the Environmental Statement should explain how these combined effects have been assessed.

7.6 Operational Scenarios

The Environmental Statement should assess a range of operational scenarios, including:

- normal operation;
- maximum rated power output;
- varying wind directions;
- differing wind speeds;
- seasonal operating conditions;
- curtailment strategies where proposed.

The assessment should demonstrate that the reported results represent realistic worst-case operational conditions.

7.7 Assessment of Uncertainty

I request that the Environmental Statement identifies the principal sources of uncertainty within the acoustic assessment, including:

- turbine specification uncertainty;
- modelling uncertainty;
- meteorological variability;
- background noise variability;
- terrain modelling assumptions;
- measurement uncertainty.

The Applicant should explain how these uncertainties have been considered when determining likely significant effects.

7.8 Monitoring and Validation

Where operational noise predictions are based upon modelling rather than measurement, I respectfully request that the Environmental Statement explains how the Applicant proposes to validate the predictions following commissioning.

This should include:

- proposed post-construction monitoring arrangements;
- circumstances under which additional monitoring would be undertaken;
- procedures for investigating complaints;
- mechanisms for demonstrating ongoing compliance with planning conditions.

Such information would provide confidence that predicted operational noise levels can be verified once the development becomes operational.

Appendix A8: Critical Review of the Shadow Flicker Assessment

Shadow Flicker

8. Critical Review of the Proposed Shadow Flicker Assessment

8.1 Introduction

The Scoping Report identifies shadow flicker as a potential environmental effect requiring assessment within the Environmental Statement.

I agree that shadow flicker has the potential to affect residential amenity where occupied properties are located in close proximity to the proposed wind turbines. Given the scale of the proposed development, with turbines having a maximum blade-tip height of approximately 196 metres, and the proximity of nearby residential properties, I consider that the Environmental Statement should contain a comprehensive and property-specific Shadow Flicker Assessment.

I therefore respectfully request that the Council's Scoping Opinion clearly specifies the scope and methodology of that assessment.

8.2 Assessment Methodology

The Environmental Statement should clearly describe:

- the assessment methodology adopted;
- all technical guidance relied upon;
- the assumptions incorporated within the modelling;
- any limitations associated with the assessment.

The methodology should be fully explained and justified to enable independent review by the Local Planning Authority, statutory consultees and affected residents.

Where updated Government or recognised professional guidance becomes available before submission of the Environmental Statement, the assessment should adopt the most current guidance or explain and justify any departure from it.

8.3 Identification of Sensitive Receptors

The Environmental Statement should identify all potentially affected sensitive receptors, including:

- occupied dwellings;
- residential gardens;
- farmhouses;
- outdoor residential amenity areas;
- schools;
- healthcare facilities;
- workplaces where prolonged occupancy occurs.

Each receptor should be individually identified and assessed where there is potential for shadow flicker effects.

I respectfully request that **Barnfield, Bradnop, ST13 7NN**, is assessed as an individual receptor rather than being represented by another property.

8.4 Property-Specific Assessment

For each potentially affected dwelling, the Environmental Statement should provide:

- receptor location;
- separation distance from each turbine;
- orientation of principal elevations;
- location of principal habitable rooms;
- orientation of principal windows;
- location of gardens, patios and other outdoor amenity spaces.

The assessment should identify which turbines are capable of generating shadow flicker at each receptor and the periods during which effects may occur.

8.5 Modelling Assumptions

The Environmental Statement should clearly identify all modelling assumptions, including:

- turbine dimensions;
- rotor diameter;
- hub height;
- blade rotation characteristics;
- geographical coordinates;
- local topography;
- building orientation;
- window orientation;
- surrounding vegetation;
- existing structures;
- terrain screening.

The assessment should also identify assumptions relating to:

- sunshine availability;
- cloud cover;
- turbine operational hours;
- seasonal variation.

Any simplifying assumptions should be clearly explained together with their potential influence upon the predicted results.

8.6 Predicted Effects

For each assessed receptor, the Environmental Statement should identify:

- the turbines contributing to shadow flicker;
- predicted periods of occurrence;
- seasonal distribution;
- frequency of occurrence;
- daily duration;
- annual duration;
- likely significance of effects.

Where multiple turbines contribute to shadow flicker at the same receptor, the assessment should identify both the individual contribution of each turbine and the combined predicted effect.

8.7 Verification of Screening

I consider that assumptions regarding screening should be supported by site-specific evidence.

Where existing buildings, woodland, hedgerows or landform are assumed to reduce or eliminate shadow flicker, the Environmental Statement should explain:

- the basis of those assumptions;
- survey methodology;
- seasonal variability;
- likelihood of future changes to vegetation.

The assessment should not assume permanent screening unless its long-term retention can reasonably be demonstrated.

8.8 Mitigation Measures

Where significant shadow flicker effects are predicted, the Environmental Statement should identify:

- proposed mitigation measures;
- operational mitigation strategies;

- turbine shutdown protocols;
- automated shadow flicker control systems;
- effectiveness of proposed mitigation;
- residual effects following mitigation.

The Applicant should also explain how mitigation would be monitored and maintained throughout the operational life of the development.

8.9 Assessment of Uncertainty

The Environmental Statement should identify the principal sources of uncertainty within the assessment, including:

- meteorological variability;
- turbine operational assumptions;
- vegetation growth or removal;
- survey accuracy;
- modelling limitations.

The significance of these uncertainties should be discussed so that decision-makers understand the confidence that can be placed upon the predicted effects.

Appendix A9: Critical Review of the Proposed Ecology Assessment

Ecology

9. Critical Review of the Proposed Ecology Assessment

9.1 Introduction

The Scoping Report identifies ecology and nature conservation as one of the principal environmental topics requiring detailed assessment within the Environmental Statement.

I acknowledge the importance of ecological assessment for a development of this scale and notes that the proposed wind farm has the potential to affect a range of ecological receptors during construction, operation and eventual decommissioning.

I respectfully request that Staffordshire Moorlands District Council ensures, through its Scoping Opinion, that the Ecological Impact Assessment (EIA) is founded upon comprehensive baseline surveys undertaken at appropriate times of year and that all reasonably foreseeable ecological effects are fully assessed.

9.2 Scope of Baseline Ecological Surveys

The Environmental Statement should provide a complete ecological baseline describing the habitats, protected species and ecological networks that may be affected by the proposed development.

I request that the baseline includes:

- statutory designated sites;
- non-statutory designated sites;
- Local Wildlife Sites;
- ancient woodland;
- priority habitats;
- veteran trees;
- hedgerows;
- watercourses;
- ponds;

- wetlands;
- ecological corridors;
- habitat connectivity.

The Environmental Statement should explain the ecological value and sensitivity of each receptor and identify how each has been considered within the assessment.

9.3 Robust Seasonal Survey Programme

I consider that ecological surveys should reflect seasonal variations in species activity and habitat use.

The Environmental Statement should therefore identify:

- survey dates;
- survey seasons;
- weather conditions;
- survey effort;
- survey methodology;
- qualifications of survey personnel;
- recognised survey guidance followed.

Where surveys cannot be undertaken during the optimum survey season, the Applicant should explain:

- why this was not possible;
- any limitations arising;
- additional surveys undertaken;
- confidence in the resulting conclusions.

I respectfully request that ecological conclusions are based upon complete seasonal survey coverage rather than limited single-season observations wherever recognised guidance recommends multi-season surveys.

9.4 Protected Species Assessment

The Environmental Statement should assess all protected and notable species with the potential to occur within the site or be affected by the proposed development.

Where appropriate, surveys should include consideration of:

- breeding birds;
- wintering birds;
- migratory birds;
- birds of prey;
- bats;
- badgers;
- otters;
- water voles;
- great crested newts;
- reptiles;
- amphibians;
- invertebrates;
- notable plant species.

The Applicant should explain why any protected species has been scoped out of detailed assessment.

9.5 Habitat Assessment

The Environmental Statement should provide detailed habitat mapping supported by recognised habitat classification methodologies.

The assessment should include:

- habitat condition;
- ecological importance;
- habitat connectivity;
- fragmentation;

- direct habitat loss;
- temporary disturbance;
- long-term habitat change.

Construction compounds, crane hardstandings, access tracks, cable routes and drainage infrastructure should all be included within the habitat assessment.

9.6 Cumulative Ecological Assessment

I consider that the Environmental Statement should assess not only the ecological effects of the Padwick Wind Farm in isolation but also cumulative ecological effects.

The cumulative assessment should consider:

- existing wind farms;
- consented developments;
- proposed developments where reasonably foreseeable;
- other infrastructure projects;
- habitat fragmentation;
- cumulative disturbance;
- cumulative bird collision risk;
- cumulative bat mortality risk;
- cumulative loss of ecological connectivity.

The methodology adopted for cumulative assessment should be clearly explained and justified.

9.7 Construction Effects

The Environmental Statement should assess ecological effects arising from construction activities, including:

- vegetation clearance;
- excavation works;
- turbine foundations;
- access road construction;

- cable trenching;
- construction compounds;
- heavy vehicle movements;
- lighting;
- noise and vibration;
- dust;
- pollution risks.

Temporary ecological effects should be distinguished from permanent habitat change.

9.8 Operational Effects

The Environmental Statement should assess operational ecological effects including:

- bird collision risk;
- bat collision risk;
- habitat displacement;
- disturbance;
- barrier effects;
- behavioural avoidance;
- changes to ecological connectivity.

Where modelling is undertaken, the assumptions and limitations should be fully described.

9.9 Mitigation, Compensation and Enhancement

I request that the Environmental Statement clearly distinguishes between:

- avoidance measures;
- mitigation measures;
- compensation measures;
- biodiversity enhancement measures.

The Applicant should demonstrate:

- how adverse effects have been avoided where practicable;
- why residual impacts remain;
- how mitigation effectiveness will be monitored;
- long-term management arrangements.

Any Biodiversity Net Gain proposals should be fully explained and supported by appropriate calculations.

9.10 Monitoring and Adaptive Management

The Environmental Statement should identify any proposed post-construction ecological monitoring, including:

- bird mortality monitoring;
- bat mortality monitoring;
- habitat monitoring;
- protected species monitoring;
- monitoring frequency;
- reporting arrangements;
- adaptive management procedures should unexpected impacts arise.

9.11 Assessment Methodology and Uncertainty

The Environmental Statement should fully describe:

- survey methodologies;
- recognised professional guidance;
- modelling assumptions;
- data limitations;
- confidence levels;
- sources of uncertainty.

Where ecological conclusions rely upon assumptions or professional judgement, these should be clearly explained.

Appendix A10: Critical Review of Proposed Hydrology & Hydrogeology Assessment

Hydrology & Hydrogeology

10. Critical Review of Groundwater, Hydrology, Drainage, Excavation and Construction Impacts

10.1 Introduction

The Scoping Report identifies hydrology, hydrogeology and flood risk as environmental topics requiring assessment within the Environmental Statement.

I agree that these matters are of particular importance given the scale of the proposed development, the substantial excavation works required for turbine foundations and associated infrastructure, and the potential for construction activities to alter existing groundwater and surface water conditions.

I respectfully request that Staffordshire Moorlands District Council requires the Environmental Statement to provide a comprehensive assessment of groundwater, drainage, excavation and construction-related impacts supported by robust baseline investigations and transparent technical evidence.

10.2 Baseline Geological and Hydrogeological Conditions

The Environmental Statement should provide a detailed description of the site's geological and hydrogeological characteristics, including:

- superficial deposits;
- underlying bedrock geology;
- geological faults where relevant;
- groundwater bodies;
- aquifer designation;
- groundwater vulnerability;
- groundwater flow directions;
- groundwater levels;
- springs;

- seepages;
- groundwater-dependent ecosystems.

The assessment should identify all existing sources of hydrogeological information together with any additional site investigations undertaken.

10.3 Ground Investigation

I respectfully request that the Environmental Statement is supported by an appropriate programme of ground investigation, including, where relevant:

- boreholes;
- trial pits;
- geotechnical testing;
- groundwater monitoring;
- permeability testing;
- infiltration testing;
- laboratory analysis.

The Environmental Statement should explain how these investigations have informed the engineering design and environmental assessment.

10.4 Groundwater Flow and Aquifer Assessment

I consider that particular attention should be given to the potential influence of the proposed development upon groundwater movement.

The Environmental Statement should assess whether:

- turbine foundations;
- crane hardstandings;
- access roads;
- underground cabling;
- drainage systems;
- temporary excavations

could alter existing groundwater flow patterns or groundwater recharge.

The assessment should identify:

- groundwater flow directions;
- hydraulic connectivity;
- potential barriers to groundwater movement;
- changes in groundwater storage;
- potential effects on groundwater-dependent habitats;
- effects on nearby water abstractions and private water supplies.

10.5 Surface Water and Drainage

The Environmental Statement should provide a detailed assessment of surface water hydrology including:

- catchment boundaries;
- drainage pathways;
- ordinary watercourses;
- ponds;
- ditches;
- culverts;
- flood zones;
- existing drainage infrastructure.

The assessment should identify:

- pre-development drainage conditions;
- construction-phase drainage arrangements;
- operational drainage systems;
- sustainable drainage measures (SuDS);
- discharge locations;
- long-term maintenance arrangements.

I request that the Environmental Statement demonstrates that the development will not increase downstream flood risk or adversely affect existing drainage patterns.

10.6 Excavation and Foundation Construction

I note that modern wind turbines require substantial reinforced concrete foundations together with extensive excavation works.

The Environmental Statement should therefore describe:

- anticipated foundation dimensions;
- excavation depths;
- excavation volumes;
- dewatering requirements;
- spoil generation;
- spoil storage;
- spoil disposal or reuse;
- concrete volumes;
- reinforcement requirements.

The Applicant should assess whether these excavations have the potential to:

- intercept groundwater;
 - alter groundwater flow;
 - affect local drainage;
 - increase erosion;
 - destabilise slopes;
 - influence nearby receptors.
-

10.7 Construction Impacts

The Environmental Statement should provide a comprehensive assessment of construction-related environmental effects including:

- earthworks;
- excavation;
- temporary drainage works;
- construction compounds;
- crane hardstandings;
- haul roads;
- cable trenching;
- temporary water management;
- fuel storage;
- concrete batching (if proposed);
- pollution prevention measures.

The assessment should distinguish between temporary construction impacts and permanent operational effects.

10.8 Water Quality

I request that the Environmental Statement includes a detailed Water Quality Assessment addressing:

- sediment mobilisation;
- suspended solids;
- accidental pollution;
- hydrocarbons;
- cementitious materials;
- concrete washout;
- chemical storage;
- spill response procedures.

The Applicant should demonstrate that suitable mitigation measures will be implemented to protect both groundwater and surface water resources throughout construction.

10.9 Private Water Supplies

Where private water supplies exist within the surrounding area, the Environmental Statement should identify:

- source locations;
- abstraction types;
- source protection areas where applicable;
- dependency upon groundwater;
- dependency upon springs;
- hydrogeological connectivity;
- groundwater flow directions;
- potential construction impacts;
- potential operational impacts;
- proposed mitigation and long-term monitoring.

Where risks are identified, appropriate mitigation and monitoring proposals should be provided.

Particular attention should be given to my own private water supply serving Barnfield, Bradnop, ST13 7NN. This supply is derived from the local groundwater system and is accessed from my top field immediately adjacent to my property, where one of the proposed wind turbines is understood to be located within approximately 200 metres.

Given the exceptional proximity of the proposed turbine to my private water supply, I respectfully request that the Council's Scoping Opinion explicitly requires the Applicant to undertake a **site-specific Private Water Supply Risk Assessment (PWSRA)** as a dedicated component of the Environmental Statement.

The PWSRA should be supported by a comprehensive hydrogeological investigation and should include:

- detailed hydrogeological mapping;
- groundwater flow modelling;
- source–pathway–receptor analysis;

- hydrogeological trace mapping where appropriate;
- identification of preferential groundwater pathways;
- assessment of excavation and foundation impacts;
- assessment of drainage alterations;
- assessment of temporary and permanent impacts upon groundwater quality and quantity;
- assessment of accidental pollution risks;
- assessment of cumulative effects over the anticipated 35-year operational life of the development.

The assessment should demonstrate, using objective evidence, that construction activities, turbine foundations, excavations, drainage works and associated infrastructure will not adversely affect the quality, quantity or reliability of my private water supply.

The Environmental Statement should also explain the contingency measures that would be implemented should any deterioration in water quality, water quantity or water pressure occur during construction, commissioning or operation.

10.10 Climate Change and Extreme Rainfall

The Environmental Statement should demonstrate that drainage and water management proposals have been designed having regard to:

- current climate change allowances;
- projected increases in extreme rainfall;
- resilience of drainage infrastructure;
- long-term operational performance.

The assessment should explain how these factors have been incorporated into the engineering design.

10.11 Monitoring and Verification

I respectfully request that the Environmental Statement identifies any proposed monitoring programme including:

- groundwater monitoring;
- surface water monitoring;
- water quality monitoring;
- drainage inspections;
- post-construction verification.

For any private water supply identified as potentially affected, including the supply serving Barnfield, ST13 7NN the Applicant should fund an independent programme of baseline water quality and water quantity monitoring before any construction or enabling works commence.

This baseline should include appropriate physical, chemical and microbiological parameters together with measurements of yield, flow rate and seasonal variation, thereby establishing an independently verifiable reference condition against which any subsequent changes can be assessed.

Monitoring should continue throughout construction, commissioning and an appropriate period following commencement of operation. The Environmental Statement should identify trigger levels for investigation, remedial action and compensation should measurable deterioration attributable to the Proposed Development occur.

10.12 Assessment Methodology and Uncertainty

The Environmental Statement should explain:

- the methodologies adopted;
- recognised technical guidance;
- modelling assumptions;
- limitations of available data;
- confidence in predictions;
- principal sources of uncertainty.

Where professional judgement has been relied upon, the basis for that judgement should be clearly explained.

Appendix A11: Critical Review of the Proposed Cultural Heritage Assessment

Heritage

11. Critical Review of Direct and Setting Impacts on Heritage Assets.

11.1 Introduction

The Scoping Report identifies Cultural Heritage as an environmental topic to be scoped into the Environmental Impact Assessment and acknowledges that the Proposed Development has the potential to give rise to both direct impacts upon archaeological remains and indirect impacts upon the setting and significance of designated heritage assets. The Report also recognises that, due to the scale of the proposed turbines, visual intrusion into the setting of heritage assets may not be capable of complete mitigation.

I agree that Cultural Heritage should form a significant component of the Environmental Statement. However, given the scale of the proposed development and the extensive visibility likely to arise from turbines with a maximum blade-tip height of approximately 196 metres, I respectfully request that the Council's Scoping Opinion specifies a more comprehensive scope for the Cultural Heritage Assessment than is outlined within the Scoping Report.

11.2 Heritage Baseline

The Environmental Statement should provide a comprehensive baseline identifying all heritage assets that could be affected directly or indirectly by the Proposed Development.

This should include:

- Scheduled Monuments;
- Listed Buildings (Grades I, II* and II);
- Conservation Areas;
- Registered Parks and Gardens;
- Historic Landscapes;
- non-designated heritage assets;
- archaeological remains;
- historic field systems;
- historic routeways;

- historic farmsteads;
- industrial heritage assets;
- undesignated archaeological features identified through field investigation.

The Environmental Statement should explain the significance of each asset and the contribution made by its setting to that significance.

11.3 Direct Physical Impacts

I note that the Scoping Report anticipates that any direct impacts upon archaeological remains may be mitigated through investigation and recording where necessary.

The Environmental Statement should nevertheless provide a full assessment of all direct impacts arising from:

- turbine foundations;
- crane hardstandings;
- access roads;
- cable trenches;
- construction compounds;
- temporary working areas;
- drainage infrastructure;
- borrow pits (if proposed);
- utility diversions.

Where archaeological remains may be affected, the Applicant should demonstrate:

- the archaeological significance of the remains;
- the extent of anticipated disturbance;
- why avoidance has or has not been possible;
- the justification for any proposed mitigation.

Archaeological excavation should not be presented as a substitute for avoiding unnecessary harm where reasonable alternatives exist.

11.4 Assessment of Heritage Setting

I consider that the assessment of setting should form one of the principal components of the Cultural Heritage chapter.

The Environmental Statement should evaluate how the Proposed Development may influence the significance of heritage assets through changes to their setting, including changes to:

- important views;
- visual relationships;
- landscape context;
- appreciation of historic character;
- tranquillity;
- skyline composition;
- intervisibility between heritage assets.

The assessment should recognise that the setting of a heritage asset extends beyond simple visibility and includes the way in which the surrounding landscape contributes to its heritage significance.

11.5 Individual Assessment of Heritage Assets

The Environmental Statement should provide an individual assessment for each heritage asset where there is potential for significant effects.

For each asset the assessment should identify:

- designation;
- significance;
- distance from the Proposed Development;
- contribution of setting to significance;
- existing views;
- predicted visibility of turbines;
- magnitude of change;
- resulting level of effect.

The methodology for determining significance should be clearly explained and consistently applied.

11.6 Heritage Viewpoints and Visualisations

Where the setting of a heritage asset is likely to be affected, the Environmental Statement should include:

- accurately surveyed viewpoint photography;
- verified wireline illustrations;
- verified photomontages;
- turbine numbering;
- viewing distances;
- orientation plans;
- visibility analysis.

Representative viewpoints should be selected from publicly accessible locations where visitors experience and appreciate the heritage asset, together with any additional viewpoints necessary to understand its historic setting.

11.7 Historic Landscape Character

The Scoping Report acknowledges that the Proposed Development has the potential to affect historic landscape character.

The Environmental Statement should therefore assess:

- historic field patterns;
- historic enclosure;
- ridge-and-furrow where present;
- historic routeways;
- settlement patterns;
- surviving agricultural landscapes;
- cumulative changes to historic landscape character.

The interaction between landscape character and cultural heritage should be assessed jointly where appropriate.

11.8 Cumulative Heritage Effects

I respectfully request that the Environmental Statement assesses cumulative impacts upon heritage assets arising from:

- the Proposed Development alone;
- existing wind energy developments;
- consented developments;
- reasonably foreseeable developments.

The cumulative assessment should explain whether successive infrastructure developments would incrementally erode the historic setting or significance of heritage assets.

11.9 Assessment Methodology

The Environmental Statement should clearly describe:

- all guidance relied upon;
- survey methodologies;
- consultation undertaken;
- desk-based research;
- site inspections;
- assumptions adopted;
- limitations of available data;
- sources of uncertainty.

Where professional judgement has been exercised, the basis for that judgement should be clearly explained.

11.10 Mitigation

Where adverse effects are identified, the Environmental Statement should explain:

- how impacts have been avoided;
- alternative layouts considered;
- micro-siting undertaken;
- design changes introduced;
- residual effects following mitigation.

The Applicant should demonstrate that opportunities to avoid harm have been considered before relying upon archaeological recording or other compensatory measures.

Appendix A12: Critical Review of the Proposed Transport & Construction Impact Assessment

Transport & Construction

12. Critical Review of Traffic, Transport, Construction Logistics, Assessment of Abnormal Loads, Noise, Dust, Public and Road Safety

12.1 Introduction

The Scoping Report concludes that Traffic and Access may be scoped out of the Environmental Impact Assessment, with the planning application instead being supported by a Transport Assessment, an Abnormal Loads Assessment and an Outline Construction Traffic Management Plan (CTMP). The Report nevertheless recognises that Public Rights of Way users and nearby residents may experience significant effects during the construction phase, principally due to delivery traffic and abnormal load movements.

I accept that a separate Transport Assessment may be an appropriate mechanism for assessing highway impacts. However, given the scale of the proposed turbines and the substantial construction activity required, the Council's Scoping Opinion should require a considerably more detailed assessment of construction logistics, abnormal loads, highway safety and construction-related environmental effects than is presently described.

12.2 Construction Traffic Assessment

The Environmental Statement, together with the supporting Transport Assessment, should provide a detailed construction traffic assessment including:

- predicted construction programme;
- construction phases;
- daily vehicle movements;
- peak daily vehicle movements;
- Heavy Goods Vehicle (HGV) movements;
- staff vehicle movements;
- contractor parking arrangements;
- construction compound access;
- temporary road closures where required.

Traffic predictions should be presented for each principal phase of construction rather than as an overall project average.

12.3 Abnormal Indivisible Loads (AIL)

The Scoping Report recognises that abnormal loads will be required for delivery of turbine components and proposes that route surveys and swept-path analysis will be undertaken.

I respectfully request that the Environmental Statement and supporting Abnormal Loads Assessment include:

- confirmed port of entry;
- complete abnormal load route;
- bridge assessments;
- highway structure assessments;
- swept-path analysis;
- junction assessments;
- temporary highway works;
- removal or relocation of street furniture;
- overhead utility assessments;
- temporary traffic management arrangements.

The assessment should demonstrate that every section of the proposed route can safely accommodate the proposed abnormal loads without creating unacceptable risks for other highway users.

12.4 Construction Route Assessment

The Environmental Statement should identify:

- all construction access routes;
- HGV routes;
- abnormal load routes;
- emergency diversion routes;
- sensitive villages;

- schools;
- healthcare facilities;
- residential areas;
- Public *and* Private Rights of Way crossings.

Alternative route options considered should also be identified together with the reasons for selecting the preferred route.

12.5 Construction Noise

Although operational noise will be addressed separately within the Environmental Statement, construction activities also have the potential to affect nearby residents.

I request that the Environmental Statement provides a detailed assessment of construction noise arising from:

- earthworks;
- excavation;
- piling (if required);
- foundation construction;
- concrete deliveries;
- crane assembly;
- heavy vehicle movements;
- site compounds;
- temporary generators.

The assessment should identify:

- receptor-specific predictions;
- duration of noisy activities;
- hours of working;
- temporary exceedances;
- proposed mitigation measures.

The assessment should also explain how the proposed mitigation measures will be monitored and enforced throughout the construction programme.

12.6 Dust and Air Quality

The Environmental Statement should assess construction-related dust emissions arising from:

- earthworks;
- excavation;
- haul roads;
- material stockpiles;
- concrete works;
- vehicle movements;
- wheel contamination;
- soil handling.

The assessment should identify:

- sensitive receptors;
- prevailing wind conditions;
- predicted dust pathways;
- mitigation measures;
- monitoring proposals.

The Applicant should demonstrate that appropriate dust suppression measures will be implemented throughout construction.

12.7 Highway Safety

I respectfully request that the Environmental Statement includes a comprehensive Road Safety Assessment considering:

- existing highway conditions;
- junction capacity;
- accident history;

- visibility splays;
- road geometry;
- bridge constraints;
- narrow carriageways;
- pedestrian movements;
- cyclists;
- equestrians;
- agricultural traffic;
- school transport;
- emergency vehicle access.

Particular consideration should be given to the interaction between abnormal load movements and existing rural highway conditions.

12.8 Public Rights of Way

The Scoping Report acknowledges that Public Rights of Way users may experience temporary restrictions during construction.

The Environmental Statement should identify:

- all affected Public Rights of Way;
- duration of restrictions;
- temporary diversions;
- crossing points;
- safety management measures;
- reinstatement proposals.

The assessment should also consider impacts upon:

- walkers;
- cyclists;
- horse riders;
- recreational users;

- users with reduced mobility.
-

12.9 Construction Traffic Management Plan

I respectfully request that the Outline Construction Traffic Management Plan includes:

- construction traffic routing;
- delivery scheduling;
- abnormal load management;
- escort arrangements;
- communication with local communities;
- contractor parking;
- wheel washing;
- road cleaning;
- temporary signage;
- incident management procedures;
- emergency access arrangements;
- complaints procedures.

The CTMP should clearly identify responsibilities for implementation and monitoring.

12.10 Cumulative Traffic Assessment

The Environmental Statement should assess cumulative construction traffic effects arising from:

- the Proposed Development;
- consented developments;
- reasonably foreseeable developments;
- other major construction projects within the locality.

The assessment should demonstrate whether overlapping construction programmes could materially increase traffic impacts beyond those associated with the Proposed Development alone.

12.11 Assessment Methodology

The Environmental Statement should clearly explain:

- traffic forecasting methodology;
- survey dates;
- traffic count methodology;
- modelling software;
- assumptions;
- forecast growth factors;
- assessment criteria;
- sources of uncertainty.

Any departures from recognised transport assessment guidance should be fully explained and justified.

Appendix A13: Critical Review of the Proposed Aviation & Telecommunications Consultation, Stakeholder Engagement and Mitigation Strategy

Aviation & Telecommunications

13. Critical Review of Consultation, Stakeholder Engagement and Mitigation Strategy

13.1 Introduction

The EIA Scoping Report identifies both **Telecommunications** and **Aviation** as technical topics requiring assessment because of the potential for operational wind turbines to interfere with communications infrastructure, microwave links, radar systems and aviation operations. The Report proposes that consultation with relevant infrastructure operators will inform both the design process and any necessary mitigation measures. It also indicates that, where no significant issues remain following technical assessment and consultation, these topics may ultimately be reported outside the Environmental Statement as standalone technical reports.

I agree that early consultation with infrastructure operators is an essential component of these assessments. However, I respectfully request that the Council's Scoping Opinion requires the Environmental Statement to provide clear and auditable evidence of the consultation undertaken, the technical assessments completed, the mitigation measures considered, and the manner in which consultation has influenced the final design of the Proposed Development.

13.2 Evidence of Telecommunications Consultation

The Scoping Report proposes consultation with telecommunications operators during the design process and the identification of fixed microwave link paths through desk-based assessment using the Ofcom Spectrum Information Portal. It also states that safeguarding buffers will inform turbine layout and that further consultation will be undertaken where infrastructure lies within safeguarding areas.

I request that the Environmental Statement includes documentary evidence demonstrating:

- all telecommunications operators consulted;
- dates of consultation;
- infrastructure identified;
- microwave links assessed;
- safeguarding zones applied;

- consultation responses received;
- technical advice provided by operators;
- Applicant's response to each consultation;
- resulting design modifications.

The Environmental Statement should demonstrate that consultation has informed the design process rather than simply recording that consultation has taken place.

13.3 Telecommunications Technical Assessment

The Environmental Statement should explain clearly:

- the methodology used to identify telecommunications infrastructure;
- all fixed microwave links assessed;
- scanning telemetry systems considered;
- safeguarding buffers applied;
- assumptions used within the assessment;
- limitations of the available information.

Where safeguarding buffers have influenced turbine siting, the Environmental Statement should identify:

- original turbine positions;
 - revised turbine positions;
 - engineering justification for amendments;
 - remaining residual effects.
-

13.4 Telecommunications Mitigation

The Scoping Report identifies several potential mitigation measures, including:

- avoidance through turbine layout design;
- relocation of transmitters or receivers;
- rerouting communications links;

- provision of alternative television reception where post-construction interference is identified.

I respectfully request that the Environmental Statement explains:

- which mitigation options were considered;
- why particular mitigation measures were selected;
- technical evidence supporting their effectiveness;
- implementation responsibilities;
- post-construction verification procedures;
- contingency arrangements should interference occur after commissioning.

Where television reception mitigation is proposed, the Environmental Statement should identify:

- eligibility criteria;
- investigation procedures;
- response times;
- long-term maintenance responsibilities.

13.5 Evidence of Aviation Consultation

The Scoping Report states that aviation assessments will consider the interests of the Ministry of Defence, Defence Infrastructure Organisation, NATS, Manchester Airport and other relevant aviation stakeholders, with consultation undertaken as the design evolves.

I request that the Environmental Statement provides documentary evidence identifying:

- every aviation organisation consulted;
- dates of consultation;
- consultation responses;
- technical concerns identified;
- Applicant's response;
- design amendments resulting from consultation;
- agreed mitigation measures.

Where objections have been resolved, the Environmental Statement should explain how resolution has been achieved.

Where concerns remain outstanding, these should be clearly identified.

13.6 Aviation Technical Assessment

The Scoping Report identifies a range of aviation issues requiring assessment, including:

- physical obstruction to aircraft;
- Primary Surveillance Radar (PSR) interference;
- Communications, Navigation and Surveillance (CNS) systems;
- Ministry of Defence safeguarding;
- NATS infrastructure;
- meteorological radar;
- military low flying;
- obstacle clearance in accordance with CAP 168.

I request that the Environmental Statement clearly identifies:

- all aviation infrastructure assessed;
 - safeguarding criteria applied;
 - radar modelling undertaken;
 - physical safeguarding assessments;
 - assumptions adopted;
 - assessment limitations;
 - confidence in the conclusions.
-

13.7 Aviation Mitigation

The Scoping Report indicates that technical mitigation will be informed by consultation with the relevant aviation operators and implemented before construction where required.

I respectfully request that the Environmental Statement provides detailed evidence explaining:

- every mitigation option considered;
- technical feasibility assessments;
- operator agreement where required;
- implementation timetable;
- verification testing;
- operational monitoring;
- residual aviation effects following mitigation.

The Environmental Statement should demonstrate that mitigation has followed the hierarchy of:

1. avoidance through design;
2. engineering mitigation;
3. operational mitigation;
4. monitoring and verification.

13.8 Design Evolution

I consider that consultation should be demonstrably linked to the evolution of the Proposed Development.

The Environmental Statement should therefore explain whether consultation has resulted in changes to:

- turbine locations;
- turbine heights;
- infrastructure layout;
- construction methodology;
- aviation lighting;
- telecommunications safeguarding;

- operational procedures.

Where no changes have been made following consultation, the Applicant should explain why.

13.9 Monitoring and Post-Construction Verification

The Environmental Statement should identify any proposed monitoring arrangements, including:

- post-construction telecommunications testing;
- investigation of reported television interference;
- verification of mitigation performance;
- aviation system monitoring where required;
- reporting procedures;
- responsibilities for corrective action.

The Environmental Statement should also explain how unforeseen operational effects will be investigated and resolved.

13.10 Transparency of Consultation

I respectfully request that the Environmental Statement provides a transparent audit trail linking:

- consultation undertaken;
- technical assessment;
- identified impacts;
- design amendments;
- mitigation measures;
- residual effects.

This will enable the Local Planning Authority to understand how consultation has influenced both the assessment process and the final design of the Proposed Development.

Appendix A14: Critical Review of the Proposed Climate Change, Carbon Balance and Climate Resilience Assessment

Climate Change

14. Critical Review of the Proposed Climate Change, Carbon Balance and Climate Resilience Assessment

14.1 Introduction

The EIA Scoping Report recognises that the Proposed Development is intended to contribute towards national decarbonisation objectives and identifies the UK's climate change policy framework, including the National Planning Policy Framework (NPPF), as an important component of the planning context. It also concludes that no significant climate impacts are anticipated during either construction or operation and proposes that climate change be scoped out of the Environmental Impact Assessment on the basis that the development will contribute to reducing greenhouse gas emissions.

I acknowledge that renewable energy developments can make an important contribution to reducing carbon emissions. However, I consider that the contribution of the Proposed Development to climate change mitigation should not be assumed solely because the project generates renewable electricity. Rather, the Environmental Statement should present a transparent, evidence-based assessment of the development's whole-life carbon impacts, climate resilience and long-term environmental performance.

Accordingly, I respectfully request that Staffordshire Moorlands District Council requires the Environmental Statement to provide a comprehensive Climate Change and Carbon Assessment supported by transparent methodologies, clearly stated assumptions and robust technical evidence.

14.2 Whole-Life Carbon Assessment

I consider that the Environmental Statement should include a comprehensive Whole-Life Carbon Assessment covering the entire lifecycle of the Proposed Development.

The assessment should quantify greenhouse gas emissions associated with:

- manufacture of turbine components;
- manufacture of reinforced concrete and steel;
- transportation of materials;
- abnormal load deliveries;

- construction activities;
- excavation and earthworks;
- operation and maintenance;
- component replacement during the operational life;
- decommissioning;
- removal of infrastructure;
- restoration of the Site.

The methodology used to calculate emissions should be fully explained and based upon recognised carbon accounting principles.

14.3 Carbon Payback Period

The Environmental Statement should clearly identify:

- anticipated annual electricity generation;
- anticipated annual carbon savings;
- assumptions regarding displaced electricity generation;
- carbon intensity factors adopted;
- calculated carbon payback period.

The assessment should explain how the carbon payback period has been calculated and include sufficient information to enable independent verification.

Sensitivity testing should also be undertaken where key assumptions materially influence the predicted results.

14.4 Embedded Carbon and Construction Materials

I respectfully request that the Environmental Statement provides a transparent assessment of embodied carbon associated with:

- turbine foundations;
- reinforced concrete;
- structural steel;

- aggregate production;
- access roads;
- crane hardstandings;
- electrical infrastructure;
- substation construction;
- cabling.

The Applicant should explain how opportunities to reduce embodied carbon have been considered during the design process.

14.5 Land Use Change and Carbon Storage

The Environmental Statement should assess whether construction activities may affect existing carbon stores through:

- soil disturbance;
- vegetation clearance;
- removal of hedgerows;
- changes in grassland management;
- excavation;
- drainage alterations.

Where relevant, the assessment should quantify any temporary or permanent loss of stored carbon and explain how these effects have been incorporated into the overall carbon balance.

14.6 Climate Change Resilience

Whilst the Scoping Report refers to climate change policy and indicates that ecological enhancement and landscaping will take future weather conditions into account, I consider that the Environmental Statement should provide a broader assessment of the Proposed Development's resilience to future climate conditions.

The assessment should consider the potential influence of:

- increased winter rainfall;
- prolonged drought;

- higher summer temperatures;
- more frequent extreme weather events;
- high wind events;
- flooding;
- erosion;
- changing groundwater conditions;
- wildfire risk where relevant.

The Environmental Statement should demonstrate that both the engineering design and environmental mitigation remain effective throughout the anticipated operational life of approximately 35 years.

14.7 Climate Adaptation Measures

The Environmental Statement should identify any design measures incorporated to improve climate resilience, including:

- drainage capacity;
- Sustainable Drainage Systems (SuDS);
- erosion protection;
- foundation design;
- slope stability measures;
- habitat resilience;
- landscaping designed for future climatic conditions;
- operational maintenance arrangements.

The effectiveness of these measures should be explained together with any residual climate-related risks.

14.8 Assessment Methodology

I request that the Environmental Statement clearly explains:

- carbon accounting methodology;
- emissions factors adopted;
- climate projections used;
- modelling assumptions;
- recognised guidance followed;
- limitations of available data;
- principal uncertainties.

Where professional judgement has been applied, the basis for that judgement should be clearly explained.

14.9 Cumulative Climate Effects

The Environmental Statement should consider cumulative climate effects where relevant, including:

- interaction with other renewable energy developments;
- cumulative landscape mitigation contributing to climate resilience;
- cumulative habitat restoration;
- cumulative effects upon carbon storage resulting from multiple developments.

Where cumulative effects are considered negligible, the reasons should be clearly explained.

14.10 Monitoring and Reporting

I respectfully request that the Environmental Statement identifies any proposed monitoring arrangements relating to climate performance, including:

- monitoring of habitat establishment where this contributes to climate resilience;
- monitoring of drainage performance under changing climatic conditions;
- review of mitigation effectiveness following extreme weather events;

- adaptive management measures should climate-related risks change during the operational life of the development.
-

14.11 Transparency of Carbon Calculations

I consider that the Environmental Statement should provide a transparent audit trail enabling the Council, statutory consultees and the public to understand how conclusions regarding climate benefits have been reached.

Accordingly, the Environmental Statement should include:

- all input assumptions;
- calculation methodologies;
- emissions factors;
- data sources;
- sensitivity analyses;
- confidence levels.

This information should be presented in sufficient detail to enable independent scrutiny and verification.

Appendix A15: Critical Review of the Proposed Assessment of Residential Amenity, Tourism and Local Community

Assess Residential Amenity, Tourism and Local Community Impacts.

Critical Review of the Proposed Assessment of Residential Amenity, Tourism and Local Community

15.1 Introduction

The EIA Scoping Report proposes that **Socio-Economic, Population and Human Health**, and certain related topics are scoped out of the Environmental Impact Assessment on the basis that significant environmental effects are not anticipated. At the same time, however, the Report acknowledges that the Proposed Development has the potential to affect a number of receptors that are directly relevant to residential amenity and community wellbeing, including nearby residential properties, Public Rights of Way users, recreational receptors, views from the Peak District National Park and the visibility of aviation lighting during the hours of darkness.

I respectfully submit that, whilst some socio-economic effects may not constitute significant environmental effects in their own right, the interaction between residential amenity, recreation, tourism and local communities warrants a more transparent and integrated assessment within the Environmental Statement.

The Council's Scoping Opinion should therefore require the Environmental Statement to demonstrate, through objective evidence, how the Proposed Development may influence the experience of residents, visitors and local businesses, both individually and cumulatively.

15.2 Residential Amenity

The Scoping Report proposes that residential visual amenity will be considered within the Landscape and Visual Impact Assessment, including views from residential properties within approximately 2 km of the Site.

I consider that residential amenity extends beyond visual effects alone.

Accordingly, the Environmental Statement should provide an integrated assessment of residential amenity incorporating:

- visual effects;
- Residential Visual Amenity Assessment (RVAA);
- operational noise;

- construction noise;
- shadow flicker;
- aviation lighting;
- construction traffic;
- construction dust;
- temporary construction disturbance;
- cumulative effects arising from the interaction of these impacts.

The Environmental Statement should explain how these environmental effects combine to influence the overall living conditions experienced by nearby residents.

15.3 Property-Specific Assessment

Where occupied dwellings are located close to the Proposed Development, the Environmental Statement should provide property-specific assessments rather than relying solely upon representative receptors.

For each property assessed, the Environmental Statement should identify:

- separation distance;
- orientation;
- principal habitable rooms;
- gardens and outdoor amenity areas;
- predicted visibility;
- predicted operational noise;
- shadow flicker potential;
- construction impacts;
- cumulative environmental effects.

I respectfully request that **Barnfield, Bradnop, ST13 7NN** is included as an individually assessed receptor owing to its proximity to the Proposed Development.

15.4 Tourism and Recreation

The Scoping Report identifies potential visual effects upon recreational receptors, including local hill summits and the Peak District National Park, together with users of Public Rights of Way.

I respectfully request that the Environmental Statement provides a more comprehensive assessment of potential effects upon tourism and recreation.

The assessment should include consideration of:

- visitors to the Peak District National Park;
- recreational walkers;
- cyclists;
- horse riders;
- local footpaths;
- promoted walking routes;
- viewpoints;
- scenic destinations;
- outdoor recreation;
- rural tourism attractions.

The assessment should distinguish between temporary construction effects and long-term operational effects.

15.5 Visitor Experience

The Environmental Statement should assess how the Proposed Development may influence the quality of the visitor experience.

This should include consideration of:

- appreciation of landscape character;
- tranquillity;
- scenic quality;
- perception of remoteness;
- recreational enjoyment;

- night-time experience arising from aviation lighting;
- cumulative visibility alongside other wind energy developments.

Where significant viewpoints are identified, the assessment should be supported by verified visual material.

15.6 Local Community Impacts

I consider that the Environmental Statement should assess how the Proposed Development may influence the wider local community throughout construction and operation.

The assessment should consider:

- temporary disruption during construction;
- increased Heavy Goods Vehicle movements;
- access restrictions;
- effects upon Public Rights of Way;
- changes in environmental quality;
- cumulative disturbance experienced by local residents;
- effects upon community facilities where relevant.

The Environmental Statement should clearly distinguish between temporary and permanent effects.

15.7 Local Economy

Whilst recognising that wider economic benefits may arise through investment and employment, I consider that the Environmental Statement should present a balanced assessment.

Accordingly, the Environmental Statement should identify:

- anticipated construction employment;
- operational employment;
- local procurement opportunities;
- expenditure within the local economy;
- potential effects upon tourism-related businesses where relevant.

Any assumptions used within the assessment should be clearly explained and supported by evidence.

15.8 Cumulative Community Effects

I respectfully request that the Environmental Statement considers the cumulative effects experienced by nearby communities arising from the interaction of multiple environmental topics.

This should include cumulative effects associated with:

- landscape and visual change;
- operational noise;
- construction noise;
- shadow flicker;
- aviation lighting;
- traffic;
- construction activity;
- recreational impacts.

The assessment should explain whether these combined effects may materially influence residential amenity or community wellbeing.

15.9 Assessment Methodology

The Environmental Statement should clearly explain:

- assessment methodology;
- baseline information;
- consultation undertaken;
- assumptions adopted;
- recognised professional guidance;
- limitations of available data;
- principal uncertainties.

Where professional judgement has been applied, the basis for that judgement should be clearly explained.

15.10 Mitigation

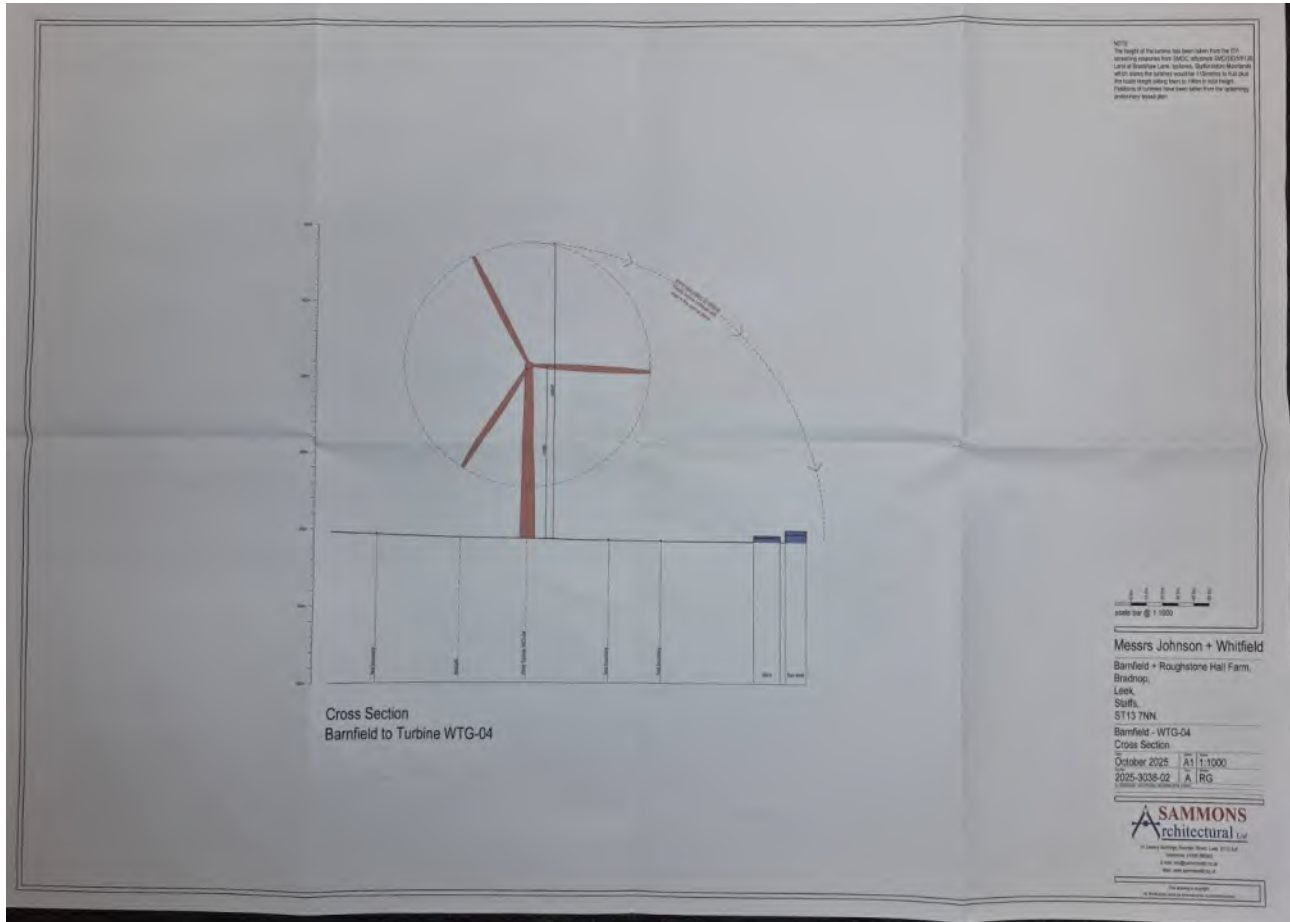
Where adverse effects are identified, the Environmental Statement should explain:

- embedded mitigation;
- additional mitigation;
- construction management measures;
- operational mitigation;
- community liaison arrangements;
- monitoring proposals;
- residual effects following mitigation.

The effectiveness of proposed mitigation should be supported by evidence wherever practicable.

Appendix B: Barnfield, ST13 7NN – Turbine Cross Section

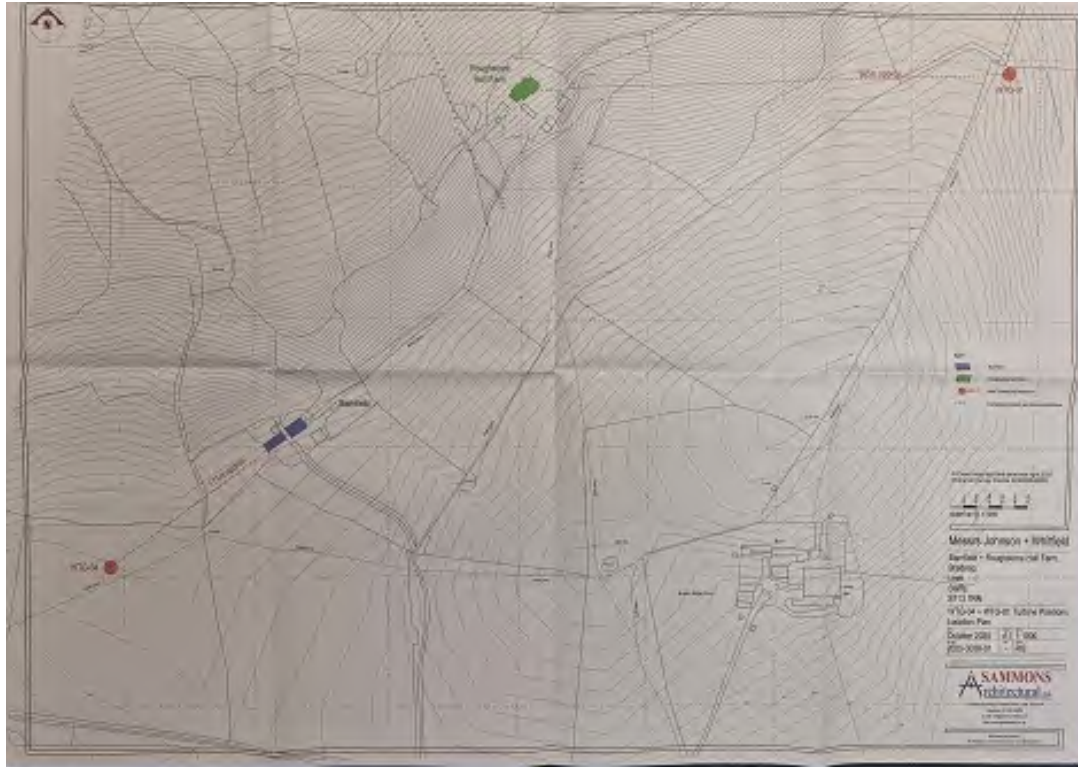
Turbine Topple Cross Sections (Barnfield (ST13 7NN))



Sammons Architectural Limited Ref. 2025-3038-02.

Appendix C: Barnfield, ST13 7NN & Roughstone Hall Farm – Topography & WTG-01 & WTG-04 Turbines Location Plan

Topography



Sammons Architectural Limited Topographic and Location map for Turbines WTG01 & WTG04; 2025-3038-01.

Appendix D: Initial Site Photo Survey – Ipstones 35 PRow / Bridle Path

These photos start on land owned by me (including Barnfield (ST13 7NN)) progressing to WTG-01 proposed location on Roughstone Hall Farm owned land (Appendices F, G, H & I also refer).



Ipstones 35 bridle path gate on land owned with Barnfield looking NE



Ipstones 35 bridle path route looking East towards by proposed Location of Turbine WTG-01 (350-400m away)



Ipstones 35 bridle path looking E before boundary ownership change between Barnfield and Roughstone Hall Farm – looking E



View along field boundary and Ipstones 35 bridle path between Barnfield owned land and proposed Location of Turbine WTG-01 – looking W



**c. 120m from corner of field by proposed Location of Turbine WTG-01 –
Ipstones 35 looking East**



**Corner of field by proposed Location of Turbine WTG-01 – Ipstones 35
looking E**



Proposed Location of Turbine WTG-01 – Ipstones 35 looking SSE

(Adjacent to (and showing as encroaching on) land belonging to owners of Roughstone Hall Farm)



Continuation of Ipstones 35 bridle path looking NNE immediately adjacent to Proposed Location for Turbine WTG-01

(Within 50m of the proposed turbine site)

Appendix E: Site Map – Location Map of Proposed Turbine Locations



Appendix F: Ipstones 35 Bridle Path Application Details (00239)

[Homepage](#) > [Environment](#) > [Environmental Land Management](#) > [Public Footpaths and Bridleways](#) > [Legal Information](#) > [Modification Application Register](#) > [Search](#)

Application Details (002369)

[Summary](#) [Applicant](#) [Attachments](#) [Routes](#) [Back](#)

Summary

Reference No: 002369

Received Date: 15-May-2012

Description:

- Upgrading of Public Footpath No. 35, Ipstones

Applicant:

- Mr B. Smith - Staffordshire Moorlands Bridleways Association

Date set for determination: 19-Oct-2018

Application Status

Application Status: Accepted

Direction from the Secretary of State to determine the application: N/A

Date of Direction: 19-Apr-2018

Request for Direction: Yes

Direction given / refused: Direction given



NOTICE OF APPLICATION FOR MODIFICATION ORDER Form 2

SECTION 53(5) OF, AND SCHEDULE 14 TO, THE
WILDLIFE AND COUNTRYSIDE ACT 1981

DEFINITIVE MAP AND STATEMENT - STAFFORDSHIRE COUNTY COUNCIL

DISTRICT OF STAFFORDSHIRE MOORLANDS

PARISH OF 1. PETERBOROUGH

TO M. K. W. D. Johnson

of Barnfield Farm, Bradnop, Leek

Staffordshire ST13 7NN

I BRIAN SMITH, STAFFS MOORLANDS BRIDLEWAYS

of THE SMITH, BARNFIELD FARM, BRADNOP, LEIK, ST13 7TL

hereby give notice that on MAY 19th 2012 I made application to the
Staffordshire County Council, County Buildings, Martin Street, Stafford, ST16 2LH that
the definitive map and statement for the area be modified by

* deleting the (footpath) (bridleway) (byway open to all traffic) (restricted byway)
from

to

* adding the (footpath) (bridleway) (byway open to all traffic) (restricted byway)
from

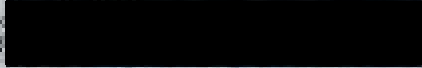
to

* (upgrading) (~~downgrading~~) to a (footpath) (bridleway) (byway open to all traffic)
(restricted byway) the (footpath) (bridleway) (byway open to all traffic) (restricted byway)
from SK 0237 5252 } see attached map
to SK 0262 5247 }

* (varying) (adding to) the particulars relating to the (footpath) (bridleway) (byway open
to all traffic) (restricted byway)
from

to

by providing that

Date 10th May 2012 Signed 

On Behalf of STAFFS MOORLANDS
BRIDLEWAYS

Form 2

WILDLIFE AND COUNTRYSIDE ACT 1981

DEFINITIVE MAP AND STATEMENT - STAFFORDSHIRE COUNTY COUNCIL

CERTIFICATE OF SERVICE OF NOTICE OF APPLICATION
FOR MODIFICATION ORDER

To: Staffordshire County Council
at: PO Box 11, County Buildings, Market Street, Stafford, ST16 2LH

I, Brian Smith
of STAFFS MOORLANDS BRIDGWAYS LTD THE SMITHY
BARNFIELD FARM, BRADNOC, LEIC. ST13 7EU.

hereby certify that the requirements of paragraph 2 and Schedule 14 to the Wildlife and
Countryside Act 1981 have been complied with.

Dated: 10 - 5 - 2019

Signed:

On Behalf of STAFFS MOORLANDS
BRIDGWAYS

Names and addresses of owners and occupiers of land on whom notice has been
served that an application for a Modification Order has been made:

MR. W. D. JONES, BARNFIELD FARM, BRADNOC
LEIC. STAFFORDSHIRE ST13 7NN

MR. M. P. WHITFIELD, BONGHSTONE HALL FARM, BRADNOC
NE. LEIC. STAFFORDSHIRE ST13 7NN

MR. J. T. HINE, BROMWEDGE FARM, BRADNOC
NE. LEIC. STAFFORDSHIRE ST13 7NN

MR. C. WILLOCK, PADWICK FARM, BRADNOC
NE. LEIC. STAFFORDSHIRE ST13 7NN

MR. J. A. CATCHELL, PADWICK FARM, HIGH FORTON HALL LANE,
RECKFORD, TARPORLEY, CHESHIRE CW6 9TH

Form 1

NOTICE OF APPLICATION FOR MODIFICATION ORDER

SECTION 53(6) OF, AND SCHEDULE 14 TO, THE
WILDLIFE AND COUNTRYSIDE ACT 1981

DEFINITIVE MAP AND STATEMENT - STAFFORDSHIRE COUNTY COUNCIL

DISTRICT OF STAFFORDSHIRE MOORLANDS

PARISH OF LESTON

To Mr. M. D. Johnson

at Barnfield Farm, Bradnop, Leek

Staffordshire ST13 7NN

I Brian Smith, STAFFS MOORLANDS BRIDLEWAY

of Mr. Smith, Barnfield Farm, Bradnop, Leek, ST13 7NN

hereby give notice that on May 2013 2013, I made application to the
Staffordshire County Council, County Buildings, Martin Street, Stafford, ST16 2LN that
the definitive map and statement for the area be modified by

* deleting the (footpath) (bridleway) (byway open to all traffic) (restricted byway)

from

to

* adding the (footpath) (bridleway) (byway open to all traffic) (restricted byway)

from

to

* (upgrading) (downgrading) to a (footpath) (bridleway) (byway open to all traffic)
(restricted byway) the (footpath) (bridleway) (byway open to all traffic) (restricted byway)

from St. 0237 0252 } See attached map

to St. 0202 0247 }

* (varying) (adding to) the particulars relating to the (footpath) (bridleway) (byway open
to all traffic) (restricted byway)

from

to

by providing that

Date 10th March 2013. Sig [Redacted]

On behalf of STAFFS MOORLANDS
BRIDLEWAYS

Appendix G: British Horse Society Guidelines & Ipstones 35 PRow

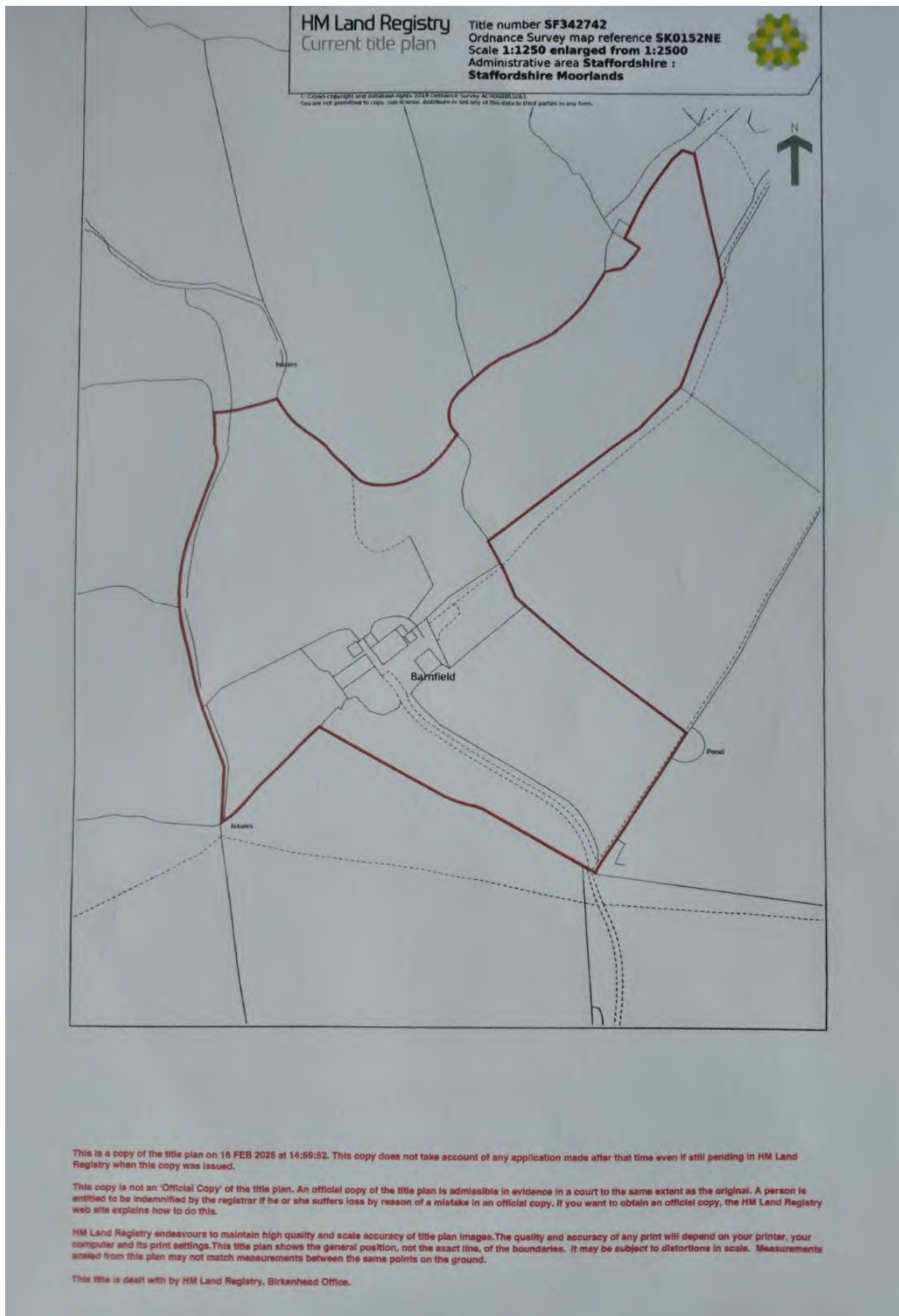
The British Horse Society recommends a minimum stand-off distance between commercial wind turbines and routes used by horses of blade tip height plus 10% (the "fall-over distance"). For a turbine with a maximum tip height of 196m, this equates to approximately 216m. Whilst this is guidance rather than a statutory requirement, it represents recognised good practice and reflects similar principles contained within the **Government's Companion Guide to PPS22**. A turbine positioned only a few metres from a route used by horse riders would fall substantially below this recommended separation and should therefore be supported by a site-specific equestrian safety assessment.

This concern is reinforced by the status of Ipstones 35. Although currently recorded as a public footpath, Staffordshire County Council has accepted sufficient historical evidence to progress its reclassification to a bridleway, with formal confirmation delayed only by administrative backlog. Given the documented equestrian use of the route and the realistic prospect of its reclassification during the wind farm's operational life, the Environmental Statement should assess Ipstones 35 on the basis of both its current designation and its evidenced and anticipated use by horse riders, rather than relying solely on its existing Definitive Map status.

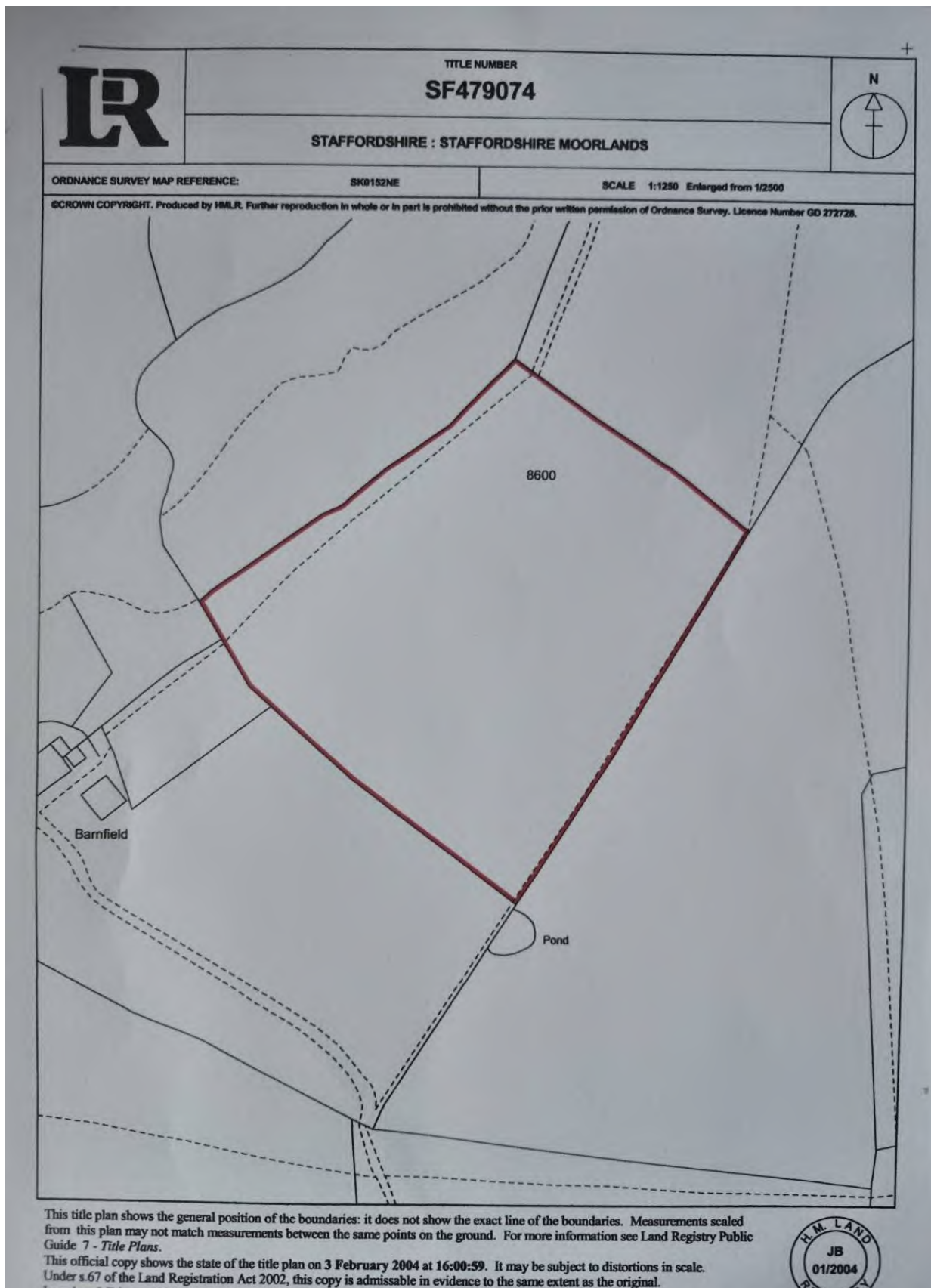
Appendix H: Land Titles



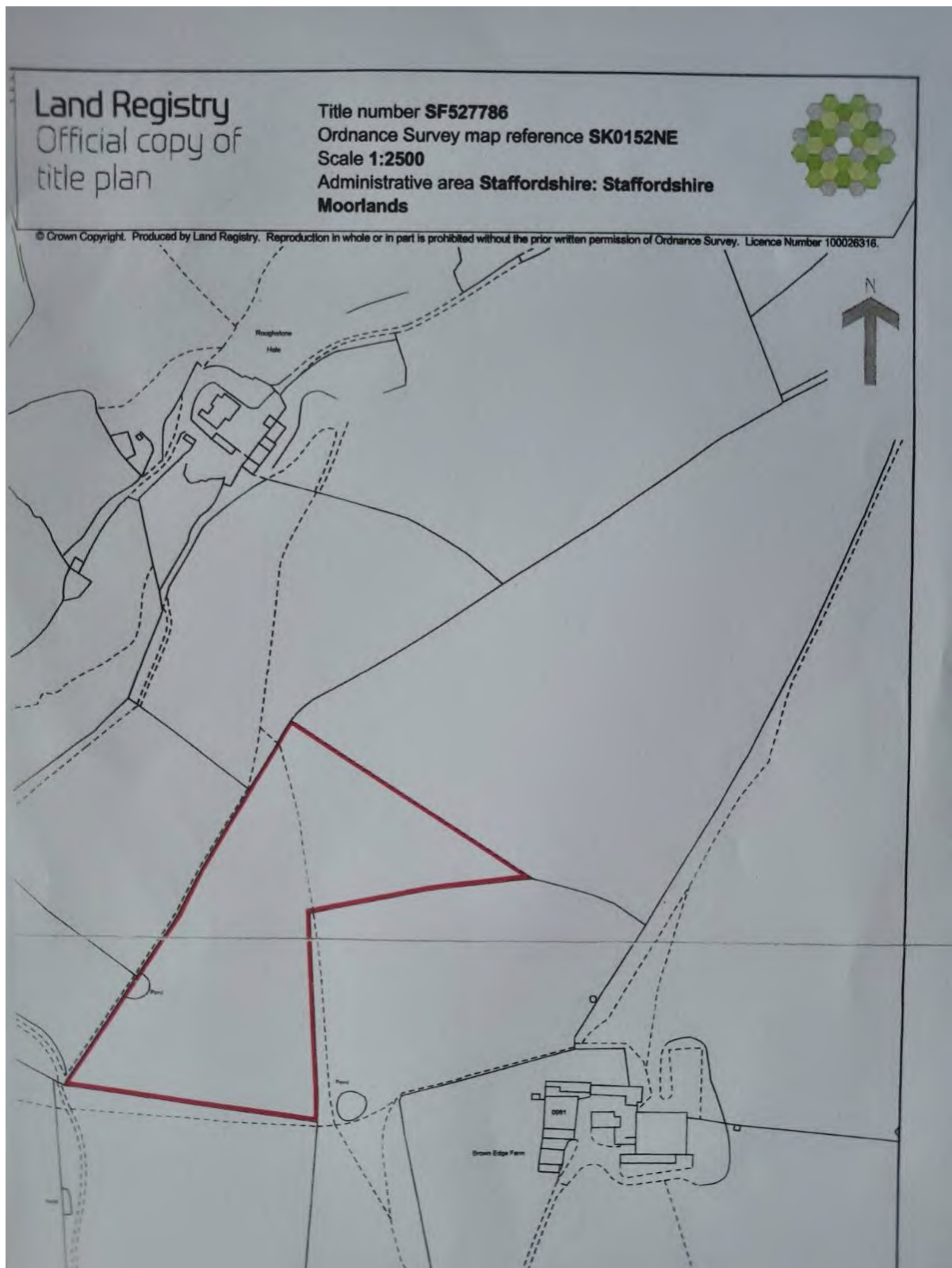
MY LAND ALSO SHOWING IPSTONES 35 PUBLIC RIGHT OF WAY



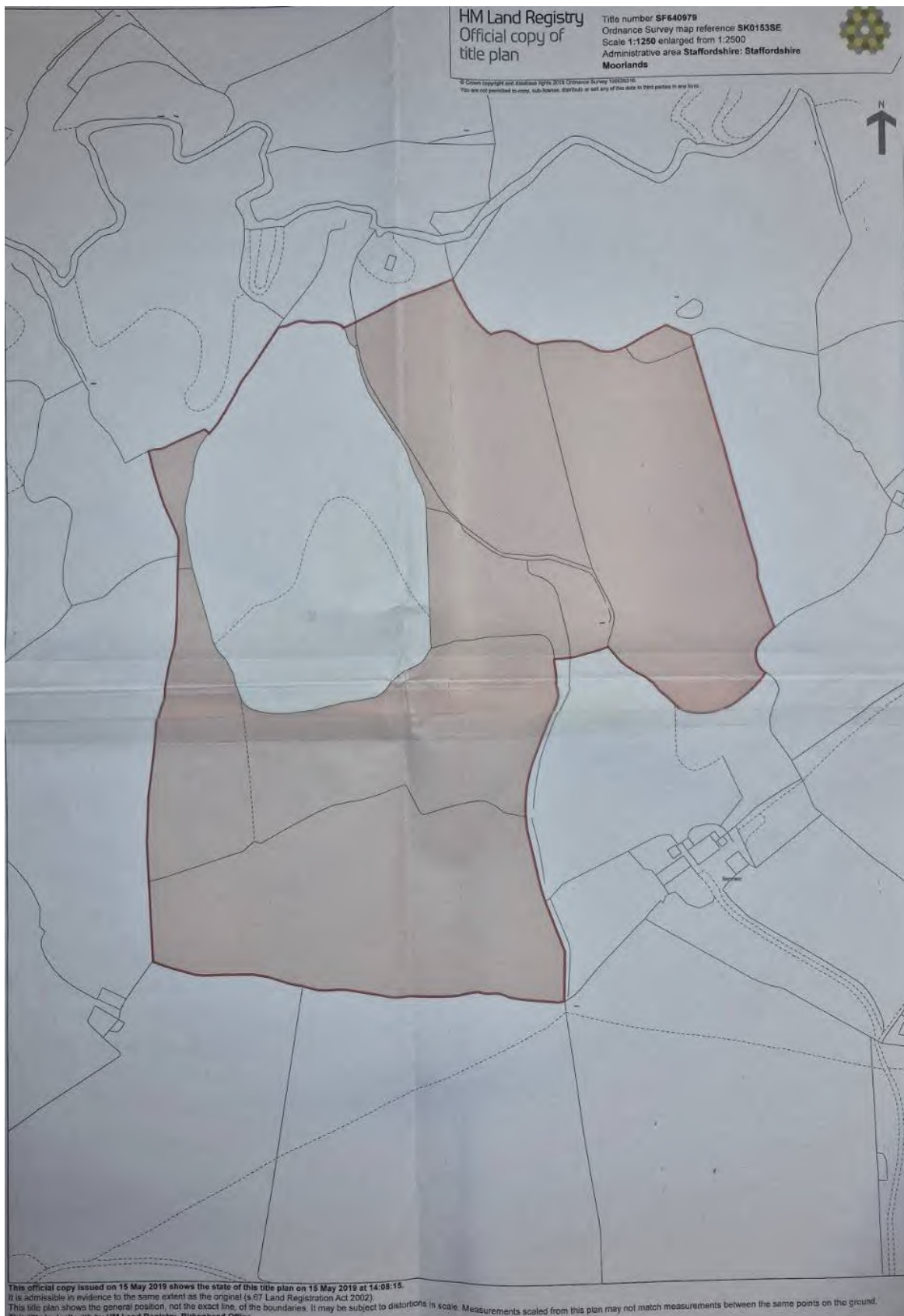
TITLE NO. SF342742



TITLE NO. SF479074

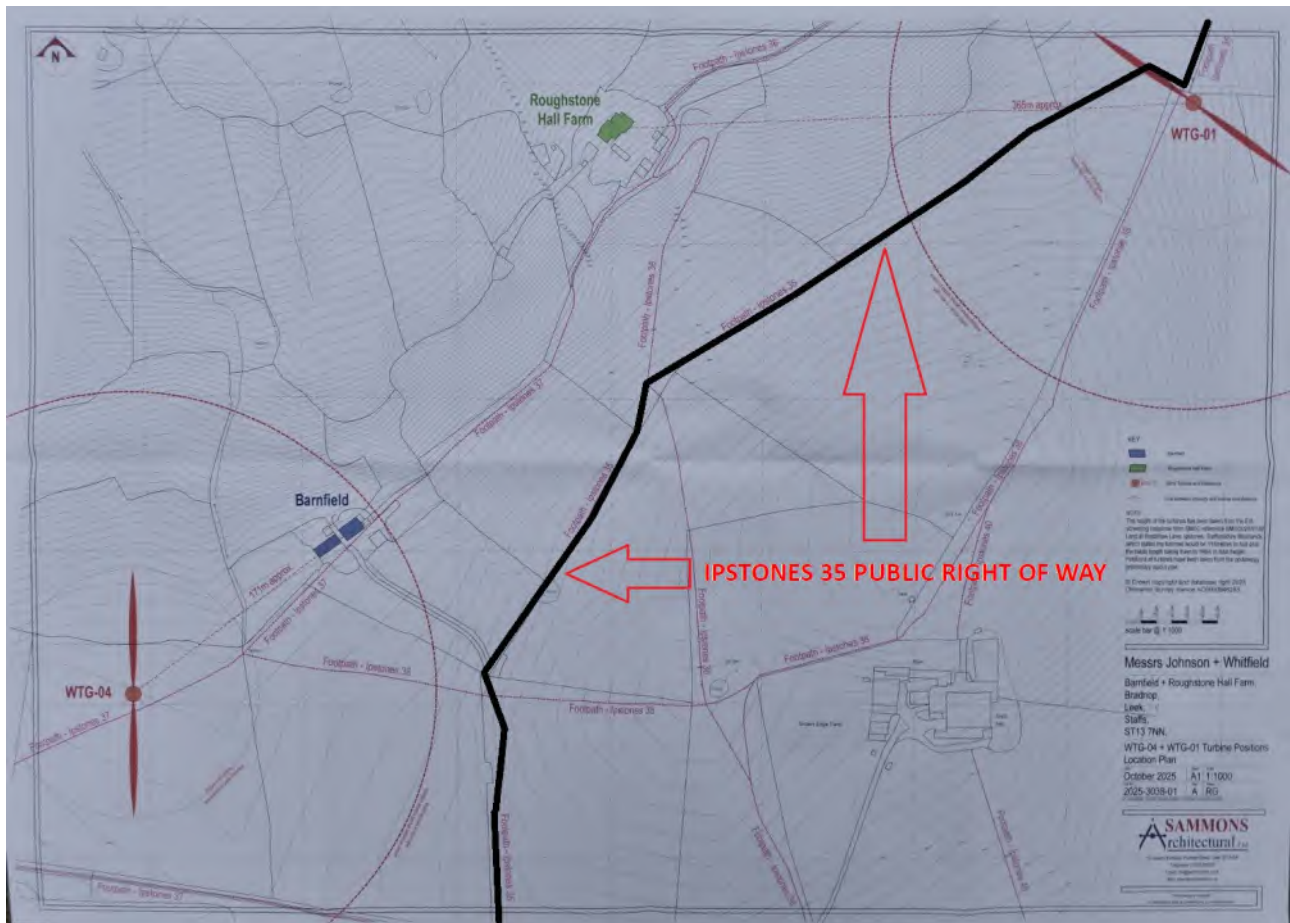


TITLE NO. SF527786



TITLE NO. SF640979

Appendix I: Padwick Wind Farm Public Rights of Way Map – Including Ipstones 35 highlighted



Appendix J: 23/1/23 Letter Staffordshire County Council – Section 3 Application (Upgrading of Public Footpath 35, Ipstones)

