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My Ref: SMD/2026/0326

Dear Mr. Fernandez

**TOWN AND COUNTRY PLANNING ACT 1990**  
**Town and Country Planning (Environmental Impact Assessment) Regulations**  
**2017 – regulation 15(1) Scoping Opinion for Proposed Development of a Wind Farm**

SMD/2026/0326 - Padwick Farm, Bradshaw Lane, Ipstones, Staffordshire Moorlands

Request for an EIA Scoping Opinion relative to a proposal to provide a wind farm comprising eight turbines with a hub height of 115m, a maximum tip of blade height of 196m and a combined output of approximately 49.9MW. The development would take place across approximately 148ha.

**1. Purpose and status of this opinion**

Further to our previous correspondence, thank you for submitting your formal request to the Council for an EIA Scoping Opinion from the Local Planning Authority. The Council received the request on the 1<sup>st</sup> July 2026. The submission has been made with reference to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations (2017).

OPD Energy has previously submitted an EIA screening request to which the Council responded (8th April 2025) under reference SMD/2025/0139 concluding that, in any subsequent planning application, the proposal should be treated as requiring an accompanying Environmental Impact Assessment (EIA positive). Any application for planning permission for the development must be accompanied by an Environmental Statement. Under regulation 2 of the 2017 Regulations, an Environmental Statement must contain, for the purpose of assessing the likely impact on the environment, the information specified in that regulation.

I recommend that you refer to the Regulations before and during the preparation of the Statement. The proposed development is of a type listed at Column 1, Section 3 (i) of Schedule 2 to the 2017 Regulations, namely: Installations for the harnessing of wind power for energy production (wind farms). The proposed project is listed in the first column in

Schedule 2 of the 2017 Regulations and exceeds the relevant threshold set out in the second column in that the development would involve the installation of more than 2 turbines

with hub heights that exceed 15 metres - the proposed development would, in this case, involve the installation of 8 turbines and significantly exceed the height threshold.

This Scoping Opinion is adopted by Staffordshire Moorlands District Council (the Local Planning Authority) under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations'). It responds to the Scoping Report submitted by Cura Terrae Land and Nature on behalf of OPD Energy (Ref. 26274, V2.0, June 2026).

The purpose of a scoping opinion is to identify the information that the Local Planning Authority considers should be included in the Environmental Statement (ES), focusing on the likely significant environmental impacts of the development. The opinion is not a determination of the planning merits of the proposal and does not indicate whether planning permission would be granted or refused.

The opinion is based on the development parameters and information currently supplied. If the proposal is materially altered, or if new information identifies additional likely significant effects, the scope of the EIA must be reviewed. The Local Planning Authority also retains the ability to request further information under the EIA Regulations where the submitted ES is insufficient to reach a reasoned conclusion on significant environmental effects.

The ES must be prepared by competent experts and should identify the expertise and qualifications of those responsible for each technical assessment. It should be proportionate, clearly distinguish significant from non-significant effects, and provide an auditable link between baseline evidence, assessment, mitigation, residual effects and any monitoring proposed.

## **2. Proposed development and assessment**

The Scoping Report describes the proposed development as a wind farm on approximately 148 hectares of land at Padwick Farm, approximately 1 km north of Ipstones and approximately 3 km south-west of Leek. The indicative scheme comprises eight three-bladed turbines with a hub height of 115 m and a maximum blade-tip height of 196 m, with an installed capacity of approximately 49.9 MW and an anticipated operational life of 35 years.

Associated infrastructure identified in the Scoping Report includes access roads, turbine foundations and hardstandings, crane pads, an anemometer mast, construction compound, substation/control building and connection to the electricity network. The construction period is anticipated to be approximately 18 months.

Natural England advises that the development's cumulative and combined impacts should be considered. The final ES should describe and assess the whole development, for which permission is sought, including all temporary and permanent works. This should include the final access strategy, off-site highway works required for abnormal loads, internal tracks, watercourse crossings, cabling, substation/control infrastructure, construction compounds and laydown areas, drainage, lighting, ecological/landscape works and decommissioning. Bradnop and Ipstones Parish Councils have both specifically identified grid connection works as a potential source of environmental impact. The final project description must therefore

clarify the status of the grid connection. If any grid connection works are to be consented separately, the impacts of these works should be included in the assessment.

Where turbine model, precise layout or other parameters have not, at application stage, been confirmed or finalised, and they may be subject to change or revision, the ES should define and base the assessment on the greater of the possible impacts.

Each technical chapter should explain which parameter or scenario has been assessed and why it represents the reasonable 'worst case' for that receptor. The statement at paragraph 2.1.6 of the Scoping Report that future layout amendments will be minimal and will not cause additional or different significant effects should not be assumed; this must be demonstrated through the terms of the assessment and design process.

### **3. Documents and Consultation Responses Reviewed**

The following material has been reviewed and informed this Scoping Opinion:

- Padwick Wind Farm - EIA Scoping Report, Cura Terrae Land and Nature, Ref. 26274, V2.0, June 2026, including the submitted landscape designation and ZTV/viewpoint figures.
- Bradnop Parish Council representation, July 2026.
- Cheddleton Parish Council consultation response, 24 July 2026.
- Coal Authority consultation response, 8 July 2026.
- SMDC Conservation Team advice, 3 August 2026.
- Environment Agency consultation response, 27 July 2026.
- Ipstones Parish Council consultation response, 3 August 2026, enclosing its July 2026 representation.
- Natural England consultation response, 27 July 2026.
- Ramblers Association (Staffordshire Moorlands) response, 8 July 2026.
- Peak and Northern Footpath Association response, 14 July 2026.
- Staffordshire County Council Highway Authority response, 27 July 2026.
- Staffordshire County Council Public Rights of Way response, 8 July 2026.
- Severn Trent Water consultation response, 29 July 2026.
- SMDC Tree Officer response, 11<sup>th</sup> August 2026
- SMDC Environmental Health response, 11<sup>th</sup> August 2026
- Staffordshire Wildlife Trust response, 13<sup>th</sup> August 2026
- All comments and representations received from the public and local residents
- Current EIA Planning Practice Guidance; current National Planning Policy Framework; current DESNZ wind turbine noise guidance; current CAA CAP 764; the adopted Staffordshire Moorlands Local Plan and relevant local landscape evidence.

The detailed consultee comments are summarised in Section 4 and are incorporated into the topic conclusions in Section 6. A consultee request has not been adopted automatically where the evidence or another technical consultation indicates a more proportionate scoping conclusion; the LPA position is stated expressly in each topic section.

Additionally, Ipstones Parish Council has produced a critique of the submitted Scoping Report in the form of a schedule of errors, anomalies and omissions. The schedule has been copied and attached to this scoping opinion as it was submitted and presented by the Parish Council. It would be helpful if you were to review the document and make note of the points raised and where necessary and appropriate provide address and correction in any future submission.

#### **4. Regulation 15(4) consultation schedule**

Regulation 15(4) requires the LPA to consult the consultation bodies before adopting a scoping opinion. The following fourteen consultees had responded at the time of writing, their comments are summarised in the table below. All of the consultee responses can be viewed in full on the Council's website pages for this Scoping application at:

<http://publicaccess.staffsmoorlands.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=183725>.

Each of the responses should be reviewed individually and in full.

|                                     |         |             |                                                                                                                                                                                                                                            |
|-------------------------------------|---------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Bradnop Council                     | Parish  | July 2026   | Requests comprehensive EIA: mining/geotechnical and industrial archaeology; property-specific shadow flicker/noise; dark sky/aviation lighting; ecology; heritage; LVIA/additional viewpoints; hydrology; traffic; trees; grid connection. |
| Cheddleton Council                  | Parish  | 24 Jul 2026 | Concerns over scale in sensitive rural landscape; asks detailed landscape/visual, ecology, PRoW, residential amenity and noise assessment.                                                                                                 |
| Coal Authority                      |         | 8 Jul 2026  | Site is in Development Low Risk Area; no specific comments; draw Standing Advice to applicant where relevant.                                                                                                                              |
| SMDC Conservation Team              |         | 3 Aug 2026  | Agrees heritage scoping methodology; add Local Heritage Register; thorough setting/visual assessment; clearer detailed ZTV/viewpoint mapping.                                                                                              |
| Environment Agency                  |         | 27 Jul 2026 | Controlled waters, FRA, WFD, biodiversity; water features/PWS/boreholes; contamination risk; INNS; Combes Valley SSSI; climate allowances.                                                                                                 |
| Ipstones Council                    | Parish  | 3 Aug 2026  | Requests comprehensive EIA: mining/industrial archaeology; shadow flicker/noise/dark sky; ecology; heritage/LVIA; hydrology; traffic/trees; grid connection.                                                                               |
| Natural England                     |         | 27 Jul 2026 | Whole development and cumulative effects; SSSI/functionally linked land; protected species/priority habitats; ancient woodland/trees; BNG; Peak District; PRoW; soils/BMV land; air/water; climate adaptation and carbon storage.          |
| Ramblers Association                |         | 8 Jul 2026  | Identifies Ipstones PRoWs 29, 33, 34, 38, 39 and 104; protect routes and provide suitable alternative if required.                                                                                                                         |
| Peak and Northern Footpaths Society |         | 14 Jul 2026 | Paths have been described as principal visual receptors, and the effect of noise on the users of these paths has been included. No further opinion on scoping report.                                                                      |
| SCC Highway Authority               | Highway | 27 Jul 2026 | Requires Transport Assessment and CTMP; construction duration/intensity, vehicle types/numbers/routes; lane/highway damage; accesses; operational visits; Bradshaw Lane widening/passing bays likely.                                      |
| SCC Public Rights of Way            |         | 8 Jul 2026  | Definitive Map search; show/label all PRoWs; no obstruction; diversion/closure legal process; early liaison; works to route surfaces require agreement.                                                                                    |
| Severn Trent Water                  |         | 29 Jul 2026 | Potential wastewater network/treatment capacity; build programme/early engagement; identify/protect sewer/water assets; Section 106 connection requirements.                                                                               |

|                              |        |                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|------------------------------|--------|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Bradnop Council              | Parish | July 2026                    | Requests comprehensive EIA: mining/geotechnical and industrial archaeology; property-specific shadow flicker/noise; dark sky/aviation lighting; ecology; heritage; LVIA/additional viewpoints; hydrology; traffic; trees; grid connection.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Cheddleton Council           | Parish | 24 Jul 2026                  | Concerns over scale in sensitive rural landscape; asks detailed landscape/visual, ecology, PRoW, residential amenity and noise assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| SMDC Environmental Health    |        | 11 <sup>th</sup> August 2026 | Noise impacts should be rigorously assessed; assessment to take account of updated guidance; should take account of all potentially impacted properties in all geographic directions and the relevant background sound levels; background noise monitoring should be representative of the area and so conducted over a reasonable length of time rather than short term monitoring.                                                                                                                                                                                                                                                                                                                                                                                                                         |
| SMDC Tree Officer            |        | 11 <sup>th</sup> August 2026 | Parts of the ancient woodland fall within the red edge boundary. It appears that turbines WTG-03 and WTG-06 would not meet the 15m buffer requirement.<br>The EIA should demonstrate that opportunities to avoid or reduce arboricultural impacts have been considered at the layout stage, including the selective positioning of wind turbines and associated infrastructure.<br>Where ancient woodland is present within or adjacent to the site, the assessment should also consider the potential direct and indirect effects upon the woodland and its associated soils and rooting environment. Due to the presence of trees within and adjacent to the site it is necessary for the applicant to provide an Arboricultural Impact Assessment and Method Statement to support any future application. |
| Staffordshire Wildlife Trust |        | 13th August 2026             | The EcIA must include comprehensive baseline ecological data, address landscape connectivity, and align with the upcoming LNRS. It should identify biodiversity enhancement opportunities, assess bird and bat impacts with detailed surveys, and evaluate indirect displacement. Transport, habitat, and protected species impacts require full assessment, with a minimum 10% biodiversity net gain and strategic habitat creation aligned with ecological networks.                                                                                                                                                                                                                                                                                                                                       |

## **5. General requirements for the Environmental Statement**

**Scope and structure:** The ES should comply with Regulation 18 and Schedule 4 of the EIA Regulations. The structure proposed at Section 7 of the Scoping Report is broadly acceptable, subject to this opinion.

**Whole development:** Assess all integral supporting infrastructure and temporary/permanent works. Where a separate grid connection or other related project is reasonably foreseeable, explain its consenting status and address cumulative effects to the extent information permits.

**Baseline and future baseline:** Define each study area, baseline sources, survey dates, limitations and relevant future baseline without the development. Use current data and current guidance at application submission.

**Design evolution and alternatives:** Explain environmental constraints, reasonable alternatives studied and design evolution for layout, turbine dimensions, access, grid/electrical infrastructure and mitigation. Natural England specifically requests clear reasoning for the preferred option.

**Assessment methodology:** State receptor value/sensitivity, magnitude, significance criteria and professional judgement transparently. Any departure from current guidance should be justified.

**Mitigation hierarchy:** Identify embedded mitigation separately from additional mitigation; demonstrate avoidance first, then reduction and where necessary restoration/compensation. Do not pre-judge residual effects before assessment.

**Construction and decommissioning:** Consider these phases proportionately across relevant topics. Uncertainty over future decommissioning methods is not, of itself, a basis for omitting likely significant effects; state reasonable assumptions.

**Cumulative and in-combination effects:** Maintain one current project schedule, with topic-specific additions/study areas where justified. Include existing, approved/under-construction, submitted and reasonably foreseeable projects where sufficient information and a realistic effect pathway exist. Include projects at scoping stage where relevant, as requested by Natural England.

**Interrelationships:** Address interactions including ecology/water; landscape/heritage; traffic/noise/air quality/PRoW; aviation lighting/visual/ecology; soils/BNG; and combined effects on residential receptors.

**Monitoring:** Where significant effects, uncertainty or adaptive mitigation remain, specify proportionate monitoring and clear triggers/actions.

**Non-Technical Summary:** Provide a concise and accurate summary of likely significant effects, mitigation, residual effects, cumulative effects and key uncertainties in plain language.

## **6. Topic-by-topic Scoping Opinion**

### **Ecology and biodiversity**

#### *Summary of Applicant position.*

Ecology is proposed to be scoped into the EIA. The applicant proposes desk study, UKHab/condition survey, PEA, protected-species surveys and EclA, with zones of influence up to 30 km depending on the receptor. The report identifies Combes Valley SSSI adjacent to the site, European sites in the wider area, non-statutory sites, Habitats of Principal Importance, watercourses/waterbodies and potential bird/bat collision effects.

#### *Summary of Relevant Consultation responses.*

Natural England requires a full assessment of direct and indirect effects on Combes Valley SSSI, including functionally linked land, locally important sites, protected/priority species, ancient woodland/ancient and veteran trees, survey work at appropriate seasons, BNG and ecological connectivity. The Environment Agency and Staffordshire Wildlife Trust requires recent EclA evidence, attention to water-dependent species, BNG and an invasive non-native species plan. Bradnop and Ipstones Parish Councils seek comprehensive bird/bat, habitat fragmentation and other protected-species assessment. Cheddleton Parish Council also identifies ecology as a principal concern.

#### *LPA Opinion*

SCOPE IN – AGREE WITH APPLICANT POSITION, SUBJECT TO FURTHER REQUIREMENTS

Ecology and biodiversity must remain a principal Environmental Statement topic. The assessment must encompass all statutory designations, non-statutory local sites (including Sites of Biological Importance / Local Wildlife Sites), and both protected and priority habitats and species.

All conclusions and recommendations in the EclA must be underpinned by up-to-date, robust field data collected within valid seasonal windows by suitably qualified Ecologists.

Baseline data must include a full data search by Staffordshire Ecological Record (SER). The EclA must clearly demonstrate how the development adheres to the mitigation hierarchy.

The Scoping Report fails to address local spatial nature strategies. The application site at Padwick Farm occupies a critical position within the upland fringe landscape of the Staffordshire Moorlands, functioning as a buffer and corridor for wider regional ecosystems.

Interim Baseline Mapping via Net Gain Staffordshire: The forthcoming Staffordshire and Stoke-on-Trent Local Nature Recovery Strategy (LNRS) is currently under development and due for final statutory publication later this year or early next year. Prior to its formal publication, the applicant must utilize the interactive Nature Recovery Network (NRN) mapping data hosted on the Net Gain Staffordshire platform ([netgainstaffs.com](https://netgainstaffs.com)). The development footprint must be explicitly mapped against these established networks to ensure the layout does not fragment or sever local ecological corridors.

LNRS Inclusion: If the final Staffordshire LNRS is formally published at any point before the final Environmental Impact Assessment EclA and full planning application are submitted, the applicant's ecological assessment and layout choices must fully consider and align with its designated spatial priorities, local habitat maps, and targeted recovery outcomes for the Staffordshire Moorlands and Churnet Valley character areas.

The Council reminds the applicant that under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 (as amended by the Environment Act 2021), all public authorities have a statutory duty to look for proactive opportunities to conserve and enhance biodiversity across their functions.

Beyond Bare-Minimum Mitigation: The EclA must look beyond passive harm-reduction and dedicate a specific chapter to standalone ecological enhancement opportunities. This must align with government biodiversity guidance, which dictates that major infrastructure projects should leave the natural environment in a measurably better state than before.

Targeted Priority Species Enhancements: The applicant must identify specific, proactive enhancement measures for Section 41 (NERC Act) priority species known to inhabit the local area, such as providing tailored nesting infrastructure for wading birds, installing bespoke bat roosting networks away from risk areas, and creating species-rich foraging margins.

Ornithological Impact, Strike, and Displacement Risks: Distribution and Abundance: Assessments must thoroughly cover breeding (BBS), wintering, and migrant birds, noting that these require different survey methodologies and timing. BBS Standard Amendment: The applicant must increase the survey effort to a minimum of 6 separate breeding bird survey visits. These surveys must be executed in compliance with the methodology set out by [birdsurveyguidelines.org](https://birdsurveyguidelines.org).

Turbine-Specific Modelling: For the wind turbine component, the diurnal flight activity and collision risk modelling data must continue to fulfil standard NatureScot guidelines, utilizing

Vantage Point (VP) watches with a minimum of 36 to 72 hours logged per VP per season to model trajectories against the 196m tip height profile. This should also include a windfarm assessment to determine ground and air volume use for wind farm developments. This will require a range of survey methods due to the habitats present and potential species to be impacted. This will include the site area plus a 500m band beyond this, any access tracks (500m either side), and up to a further 6km, depending upon the species present. This should be carried out by experienced and appropriately licenced ornithologists who are familiar with a range of survey methodologies for birds, in accordance with the NatureScot guidance on Recommended bird survey methods to inform impact assessment of onshore windfarms (updated March 2025).

Upland Rarities Mandatory Scope: The final EclA must include dedicated, species-specific surveys targeting upland rarities, red list, local BAP and Annex 1 as well as Schedule 1 species (such as Merlin, Short-eared Owl, and Hobby) known to utilize the regional topography, mapping their specific nesting and foraging areas.

Indirect Displacement Evaluation: The ecological impact assessment zone must extend past the physical footprint to include a 500-800 metre buffer around each turbine unit to fully quantify the indirect "functional habitat loss" caused by avian avoidance behaviours.

Bat Ecology, Foraging Corridors and Stand-off Buffers: The proposed scope of work in the scoping report does not detail vertical clearance margins. The network of surrounding habitats provides vital commuting and foraging pathways connected to the Churnet Valley ecosystem.

High-Altitude Collision Risks: Targeted bat activity surveys (using static automated detectors at height or at representative boundaries across spring, summer, and autumn) must focus on species highly vulnerable to turbine blade strike and barotrauma, particularly Noctules (*Nyctalus noctula*) and Pipistrelles.

Calculation of Stand-off Buffers: In compliance with Natural England's technical guidance, all turbines must maintain a strict minimum 50-metre stand-off buffer distance. This distance must be calculated from the outermost tip of the turbine blades to the highest point of the nearest structural habitat feature (such as hedgerows, mature trees, or drystone walls)—not simply from the turbine mast base. Siting turbines directly over or immediately adjacent to linear flight paths will not be supported.

Survey Effort – the EclA should follow Bat Conservation Trust's recommended guidance: 'Bats and onshore wind turbines – survey, assessment and mitigation' – a guidance document prepared jointly by NatureScot (Scottish Natural Heritage), Natural England, Natural Resources Wales, RenewableUK, Scottish Power Renewables, Ecotricity Ltd, the University of Exeter and the Bat Conservation Trust (BCT) with input from other key stakeholders as well as Collins (2024). This includes collating relevant bat information within 10km of the proposed wind energy site and abiding to recommended survey conditions. As per the guidance, roost surveys must include key features within the rotor radius plus a 200m buffer zone to identify high-risk roosting locations.

Aquatic Habitats and Protected Species Baselines: The justification in Table 4.3 of the Scoping Report, regarding the presence of American Signal Crayfish within Coombes Brook, must not be used to downplay or bypass protected species baseline surveys.

**White-Clawed Crayfish Survey Mandate:** Given the historical presence of White-Clawed Crayfish (*Austropotamobius pallipes*) within the Coombes Brook catchment, the applicant must conduct presence/absence surveys adhering to standard ecological methodologies.

**Watercourse Protections:** The EclA must detail exact construction safeguards for Coombes Brook and its minor tributaries to eliminate risks of sedimentation or pollutant runoff during extensive upland excavation.

**Statutory Biodiversity Net Gain (BNG) and Delivery Context: Mandatory 10% Gain:** The development must achieve a minimum 10% Biodiversity Net Gain (BNG) calculated via the statutory biodiversity metric.

Minimum validation requirements as per the Government's BNG Planning Practice Guidance must be submitted alongside a post development metric, habitat map and draft HMMP.

**Baseline Surveys:** The baseline habitat calculations must be supported by a UKHab survey with condition assessments carried out during the optimal botanical survey window (May to September) due to the flowering period of key grassland indicator species. This is especially important due to the presence of priority grassland habitats within the red line boundary. The UKHab survey report must fully justify reasoning behind baseline habitat classifications and condition, referencing UKHab definitions, BNG condition assessment and also provide a species list - with DAFOR for grasslands plus any quadrat raw data. As noted above, surveys should be carried out at the correct time of year preferably as per Handbook for Phase 1 Habitat Survey (JNCC, 2016).

**Strategic Delivery:** Given the challenging upland growing conditions and slow habitat establishment timelines in the Staffordshire Moorlands, on-site habitat creation must incorporate realistic, prolonged target-condition timelines. Any off-site BNG delivery must be strategically targeted to reinforce the core ecological networks identified on the Netgainstaffs platform and support the habitat creation zones outlined in the upcoming LNRS.

The proximity of statutory sites and the scale/height of the turbines mean that ecological assessment must be integrated with the final layout and should not rely only on generic fixed-distance buffers where a wider zone of influence is ecologically justified.

The ES should provide sufficient information to inform the Council's separate duties under the Conservation of Habitats and Species Regulations 2017, including consideration of functionally linked land and qualifying bird interests where relevant. The Habitats Regulations Assessment itself is a separate competent-authority process.

The survey table gives relatively simple monthly breeding and wintering bird survey frequencies. The final ornithological survey scope, duration, vantage-point coverage and any collision-risk modelling should be agreed with the relevant ecological consultees and be sufficient to assess collision, displacement/disturbance, barrier effects and cumulative effects for sensitive species.

Cumulative ecological assessment should not be limited to other wind farms where other plans or projects could combine to affect the same designated sites, habitats or species.

The applicant scope is broadly appropriate but must be strengthened to address and respond to the requirements of the consultees as set out below:

- Use current ecological data and surveys at appropriate seasonal windows by suitably qualified/where necessary licensed ecologists. Survey scope should be capable of assessing the final turbine layout and all associated infrastructure, not only turbine footprints.
- Assess direct/indirect effects on Combes Valley SSSI and its notified features, including hydrological/geomorphological connections and functionally linked land where relevant. Address other statutory and non-statutory sites within a justified zone of influence.
- Assess protected and priority species through construction, operation and decommissioning. Ornithological work must be sufficient to assess collision, displacement/disturbance, barrier effects and cumulative effects; bat survey/collision risk work should follow current guidance and be proportionate to the identified risk.
- Map and avoid ancient woodland, ancient/veteran trees and other irreplaceable/sensitive habitats. Show buffers and explain how the layout, tracks, drainage, lighting and access have been designed around them.
- Integrate ecology with hydrology for Coombes Brook, ponds, watercourses, GWDTE, private water supplies and aquatic species, including white-clawed crayfish where evidence indicates a pathway.
- Provide BNG using the statutory metric, but distinguish BNG from mitigation/compensation for significant ecological effects. Identify habitat management, LEMP and monitoring as needed.
- Prepare an invasive non-native species management plan proportionate to the baseline findings, as requested by the Environment Agency.
- Provide information sufficient for the LPA's separate Habitats Regulations duties; the HRA itself remains a competent-authority process.
- Cumulative ecological assessment must not be limited to wind farms if another plan/project could act on the same designated site, habitat or species.

#### *Components Proposed to be Scoped Out*

SSSI interest relating only to geology, may be omitted from the topic of ecology where there is no ecological pathway. Aquatic invertebrates and hazel dormouse should only be finally excluded where updated site-specific evidence and consultee advice demonstrate no realistic significant-effect pathway.

### **Landscape and visual impact**

#### *Summary of applicant position.*

Landscape and visual impact is proposed to be scoped into the EIA. The applicant proposes a 45 km initial study area, with detailed assessment focused by ZTV/fieldwork. The Peak District National Park lies approximately 1.7 km from the site. The 2015 Staffordshire Moorlands Wind Turbine Landscape Sensitivity Study identifies the relevant on-site landscape character types as having high sensitivity, while its tallest assessed turbine category (111-140 m) is below the proposed 196 m maximum tip height.

#### *Summary of consultation responses.*

Natural England requires full landscape/visual assessment, including effects on Peak District National Park special qualities, cumulative effects including proposals at scoping stage, and layout alternatives. SMDC Conservation requests a clearer, more detailed ZTV/viewpoint map. Bradnop and Ipstones Parish Councils request additional viewpoints including Ipstones Edge, Foxt Road, Kingsley Holt, Bradnop, Cauldon Lowe, Weaver Hills, Morridge Road, Ramshaw Rocks, Kingsley Moor, Werrington, Leek and Cheadle. Local residents and Cheddleton Parish Council identifies landscape/visual effects as a principal concern. SCC Rights of Way and the Ramblers responses reinforce the importance of recreational receptors.

*LPA Opinion*

SCOPE IN – AGREE WITH APPLICANT POSITION, SUBJECT TO FURTHER REQUIREMENTS

Consideration of landscape and visual impacts should include a robust assessment of: impacts on the Peak District National Park, the cumulative effects of the development, impacts on residential visual amenity, and the impacts of night-time aviation lighting.

- Use a ZTV- and fieldwork-led detailed study area. A 15-20 km focus may be reasonable for detailed effects but must not operate as a rigid cut-off where the final ZTV identifies sensitive receptors beyond it.
- Assess effects on the character and special qualities/purposes of the Peak District National Park and have regard to its current Management Plan. The public-body duty highlighted by Natural England should be reflected in the assessment and design response.
- Provide final bareground and appropriately screened ZTVs with assumptions stated. Supply a legible, detailed viewpoint location plan; the Council Conservation Team's concern that the current map scale prevents precise interpretation should be addressed.
- Agree final representative viewpoints with the LPA and relevant landscape consultees/PDNPA. The additional parish council locations should be tested against the final ZTV, field verification and receptor representation; they need not all be duplicated where another viewpoint demonstrably represents the same effect.
- Prepare visualisations/photomontages to current recognised standards using the reasonable worst-case turbine envelope. Include construction cranes where this could create a materially different temporary effect.
- Provide a Residential Visual Amenity Assessment for potentially affected properties using current Landscape Institute guidance. Do not assume every property in the wider ZTV requires individual RVAA; select receptors on the basis of proximity, orientation, fieldwork and potential for the residential visual amenity threshold to be approached.
- Provide a specific night-time aviation lighting assessment, including the final/maximum likely lighting specification, intensity and visibility controls permitted by aviation requirements, and night-time visualisations from agreed sensitive receptors where needed. Address rural dark-sky character and residential light intrusion as raised by Bradnop and Ipstones Parish Councils.
- Undertake cumulative LVIA including existing Garstones Farm turbines and relevant existing, consented, submitted and reasonably foreseeable wind-energy development, including relevant schemes at scoping stage where sufficient information exists.
- Assess PRoW and recreational users, including long-distance routes and local paths, as visual receptors. Use Staffordshire County Council's Definitive Map rather than the erroneous Lancashire County Council reference in the Scoping Report.
- Assess decommissioning proportionately using reasonable assumptions; it should not be wholly excluded simply because the future baseline is uncertain.

**Water environment, geology, soils and agricultural land**

*Summary of applicant position.*

Water Environment, Geology and Soils is proposed to be scoped into the EIA for hydrology, flood risk, groundwater, water supplies/abstractions and GWDTE. The applicant proposes to omit a detailed soils assessment because the mapping of the area does not identify sensitive/protected peat soils.

*Summary of consultation responses.*

The Environment Agency requires a water-features survey, private-water-supply/borehole enquiries, a controlled-waters preliminary risk assessment, site-specific Flood Risk Assessment (the site exceeds 1 ha), climate-change allowances and WFD screening. Natural England requires soil and Best and Most Versatile (BMV) agricultural land effects to be considered and states that a detailed ALC survey may be needed. Bradnop and Ipstones Parish Councils request hydrology, runoff, borehole, soil compaction/erosion and watercourse assessment. The Coal Authority confirms the site is within its Development Low Risk Area and has no specific comments, subject to Standing Advice. Severn Trent identifies potential wastewater capacity and utility-asset issues.

#### *LPA Opinion*

#### SCOPE IN – AGREE IN PART WITH APPLICANT POSITION

Water, flood risk and groundwater should remain as scoped in. A detailed peat assessment may be excluded if it can be confirmed that there are no areas of sensitive/protected peat soils that would be effected, but impacts on soils/agricultural land and ground conditions cannot be treated as wholly outside the scope of the environmental evidence base.

- Provide an updated hydrological/hydrogeological baseline including Coombes Brook and other ordinary watercourses, surface drainage, groundwater vulnerability, GWDTE, abstractions and private water supplies. Check Council Public Protection records, BGS borehole information and affected landowners as advised by the Environment Agency.
- Undertake a water-features survey and provide a preliminary risk assessment for controlled waters, including historic land-use/contamination pathways and a contingency for unexpected contamination.
- Submit a site-specific Flood Risk Assessment and drainage strategy addressing ordinary watercourses, downstream receptors, climate-change allowances, SuDS, watercourse crossings, erosion/sediment and pollution prevention. Liaise with the LLFA for local flood-risk evidence.
- Provide WFD screening and any further WFD assessment needed to demonstrate no deterioration of the Coombes Brook catchment water body and appropriate mitigation/enhancement.
- Assess soil resource effects from foundations, tracks, compounds, cable trenches and off-site access works: stripping, storage, compaction, erosion, reuse and reinstatement. If BMV land may be materially affected, provide proportionate ALC evidence, potentially detailed survey in line with Natural England advice.
- Confirm the absence of peat/sensitive soils with site-specific evidence appropriate to the final layout before excluding a detailed peat assessment.
- Integrate water assessment with ecology and tree/ancient woodland constraints and identify CEMP controls, monitoring and contingency measures.
- The Coal Authority's Low Risk Area response means a dedicated coal-mining EIA chapter is not required on current evidence. The applicant should nevertheless have regard to Coal Authority Standing Advice and provide geotechnical/ground-investigation evidence necessary for safe foundation and infrastructure design. Any evidenced non-coal mining/quarrying legacy with environmental implications should be addressed underground conditions and/or cultural heritage as appropriate.
- Severn Trent's wastewater/network comments should be addressed proportionately in the project description and utilities/water evidence. Confirm the construction welfare/wastewater strategy, any public sewer connection and protection/diversion of Severn Trent assets.

#### **Cultural heritage and archaeology**

#### *Summary of applicant position*

Cultural Heritage is proposed to be scoped into the EIA with no elements excluded. The applicant identifies Scheduled Monuments, 171 listed buildings within 5 km, conservation areas, nearby listed farmsteads and listed parks/gardens with a high designation in the wider area, and acknowledges potential significant setting effects.

#### *Summary of consultation responses*

The SMDC Conservation Team agrees with the proposed heritage scoping methodology, subject to use of the Staffordshire Moorlands 'Local Heritage Register' and clearer ZTV/viewpoint information. It identifies Padwick Farm, a Grade II Listed Building, and Outfarm (field barn), possibly a non-designated asset, as being within the site location boundary. The response points to and lists other nearby Grade II/II\* assets including Sharpecliffe Hall, Whitehough and associated structures. Impact Assessment for heritage assets needs to be informed by the contribution that setting makes to significance, in accordance with GPA3 guidance (this is not mentioned in Section 4.5 of the Scoping Report). Bradnop and Ipstones Parish Councils have additionally requested consideration of industrial/mining archaeology, including former quarry/extraction landscapes, spoil heaps, tramways/haul routes and related earthworks.

#### SCOPE IN – AGREE WITH APPLICANT POSITION, SUBJECT TO REQUIREMENTS

Heritage and archaeology must remain fully scoped in. The Conservation Team broadly agrees the methodology; the ES should incorporate the additional local-register, visual-setting and non-designated industrial archaeology requirements.

- Use the Staffordshire Historic Environment Record, Staffordshire Moorlands Local Heritage Register, historic mapping and other current sources. Consider LiDAR/field verification where appropriate to identify mining/quarrying/industrial archaeological features raised by the Parish Councils.
- Impact Assessment for heritage assets needs to be informed by the contribution that setting makes to significance, in accordance with GPA3 guidance.
- The proposed criteria in Table 4.8 when considering Value / Sensitivity is not sufficiently developed to determine the differences between heritage assets of the highest significance and those of lower significance. It is crude by having just three levels of significance. In terms of heritage assets, the correct approach to assessing impact is to follow published guidance such as the IEMA, Cultural Heritage Impact Assessment (CHIA), which is approved by both institutes, CiFA and IHBC.
- Assess direct physical effects on known/potential archaeology and setting effects on designated/non-designated heritage assets, conservation areas, designed landscapes and historic landscape character.
- Treat the proposed 1 km/5 km/15 km study areas as starting frameworks, not rigid cut-offs. The final ZTV, asset significance and sensitivity to long-distance change should determine whether an asset requires detailed assessment beyond those distances.
- Coordinate heritage visualisations with the LVIA but make distinct heritage-significance judgements. Provide a clearer detailed ZTV/viewpoint map, as requested by the Conservation Team.
- Explain design evolution and avoidance/micro-siting undertaken to reduce harm to nearby listed farmsteads, Sharpecliffe Hall, Whitehough and other sensitive assets.

- Do not pre-judge mitigation or residual harm at scoping stage. The Conservation Team correctly notes that the degree of impact must first be assessed.
- Assess cumulative heritage effects where multiple wind-energy developments could alter the setting of the same asset or historic landscape.
- Correct the Scoping Report's reference to micro-siting of 'pylons' where it is intended to refer to turbines or associated infrastructure.

## Noise and vibration

### *Summary of applicant position*

Noise and vibration is proposed to be scoped into the EIA for construction (subject to a 500 m receptor screen) and operation. The Scoping Report relies on ETSU-R-97 (1996) and the 2013 IOA Good Practice Guide and proposes no separate assessment of low-frequency noise/infrasound and to scope out decommissioning noise.

### *Summary of consultation responses.*

Bradnop and Ipstones Parish Councils request full day/night wind-turbine noise assessment, amplitude modulation/low-frequency matters and cumulative noise with other existing turbines. Cheddleton Parish Council also identifies noise as a principal concern. SMDC Environmental Health requires that noise impacts should be rigorously assessed and that the assessment should take account of updated Government guidance; the assessment should take account of all potentially impacted properties in all geographic directions and the relevant background sound levels – the receptor screen should be increased to at least 700m, complaints have been received from that distance particularly where failing parts are at play; background noise monitoring should be representative of the area and so conducted over a reasonable length of time rather than short term monitoring. Local Residents raise impacts from operational noise as a principal concern, in most cases citing the proximity of their homes to proposed turbine locations.

### *LPA Opinion*

#### SCOPE IN - METHODOLOGY MUST BE UPDATED

Noise should remain an ES topic. The 1996 ETSU-R-97 methodology, cited in the Scoping Report, was replaced by DESNZ guidance published on 19 June 2026, which must be used for the noise impact assessment.

- Use the Department for Energy Security and Net Zero 'Assessment and Rating of Wind Turbine Noise' guidance published 19 June 2026, together with any current associated good-practice guidance. The ES should not continue to present ETSU-R-97 (1996) as the current controlling methodology.
- Agree baseline survey locations and methodology with the Council's Environmental Health Officer before monitoring is undertaken, if possible. Include potentially affected residential receptors and any other noise-sensitive premises identified by the final prediction envelope.
- Correct the cumulative baseline. The Scoping Report identifies the existing Garstones Farm wind farm just over 1 km from the site, yet its noise section states that no other wind-energy developments were found within 5 km. Existing Garstones turbines and any relevant live proposal must be tested under the current cumulative noise method.
- Assess construction noise/vibration using the final infrastructure and activity schedule, including access/track works, compounds, foundations, construction traffic, any borrow pits/blasting and timing/duration. A 500 m screen may inform proportionality but

should not automatically exclude an effect pathway from construction infrastructure closer to receptors.

- Assess operational noise from non-turbine plant (for example substation/control equipment and any other electrical plant included in the final scheme) under the appropriate methodology.
- Provide a proportionate decommissioning noise assessment using reasonable assumptions and identify later detailed controls in a decommissioning management plan.
- Low-frequency sound, infrasound, ground-borne vibration and amplitude-modulation treatment should follow the 2026 DESNZ framework. A separate bespoke assessment should not be required merely because a Parish Council requested one where the current national methodology states how these matters are to be treated; any departure should be justified by site-specific evidence or EHO advice.

### **Shadow flicker**

#### *Summary of applicant position.*

Shadow flicker is proposed to be assessed for operation using a study area of approximately ten rotor diameters, anticipated by the applicant to be around 1.5 km, with construction and decommissioning excluded.

#### *Summary of consultation responses.*

Bradnop Parish Council seeks property-by-property assessment of all properties within at least ten rotor diameters and additional elevated/direct-line-of-sight receptors up to 1.5 km; its representation lists numerous properties and postcode areas. Ipstones Parish Council seeks 1,300 m/1,500 m screening and property-specific assessment. Both request seasonal/window-orientation/topographic modelling. These fixed distances are consultee requests rather than an LPA-adopted substitute for the geometry of the final turbine model. Local Residents raise impacts from shadow flicker as a principal concern, in most cases citing the proximity of their homes to proposed turbine locations.

#### *LPA Opinion*

#### **SCOPE IN – STUDY AREA SUBJECT TO THE FINAL GEOMETRY OF THE DEVELOPMENT**

The impacts of operational shadow flicker should be scoped in. The final study area must be based on the actual maximum rotor diameter, turbine positions, solar geometry and receptor orientation rather than an arbitrary fixed radius.

- Identify all dwellings and other genuinely sensitive occupied buildings capable of experiencing shadow flicker within the final geometric study area. The Bradnop property list and the settlements/areas raised by both Parish Councils should be used as a check that relevant receptors have not been omitted, but inclusion should be based on actual exposure geometry.
- Present theoretical/worst-case and realistic meteorological predictions, including window orientation, terrain/screening assumptions, seasonal timing, annual hours and maximum daily duration.
- Use current UK evidence/guidance at the date of assessment and explain any screening thresholds used.
- Demonstrate layout avoidance first and, where necessary, provide an enforceable turbine-curtailement/shutdown protocol or other effective mitigation for affected receptors.
- Update the cumulative search and test whether the final ten-rotor-diameter zones overlap with Garstones Farm or other relevant turbines.

- Construction and decommissioning shadow flicker may be scoped out because the phenomenon arises from operating rotors.

### **Telecommunications**

#### *Summary of Applicant position.*

The applicant proposes operational telecommunications assessment, identifying fixed links/operators and designing to avoid interference; construction/decommissioning effects are proposed to be scoped out.

#### *Summary of Consultation responses.*

None of the consultees made specific comment in relation to impacts on telecommunications. Bradnop/Ipstones raise impacts on grid/electrical infrastructure generally but not a separate fixed-link objection.

#### *LPA Opinion*

SCOPE IN INITIALLY / MAY BE RESOLVED

Operational telecommunications should remain within the assessment until current operator consultation and the final turbine layout demonstrate no likely significant effect; it may then be reported as a concise standalone technical assessment cross-referenced by the ES.

- Consult Ofcom/relevant telecommunications operators using current datasets and safeguarding requirements.
- Map affected fixed-link paths/safeguarding zones against the final turbine envelope and document agreed avoidance or rerouting/mitigation.
- Provide a proportionate process to investigate and remedy verified post-construction broadcast reception effects where relevant.
- Construction/decommissioning telecommunications effects may be scoped out unless later design identifies a specific pathway.

### **Aviation and aviation lighting**

#### *Summary of Applicant position.*

Aviation is proposed to be scoped in, including aerodrome safeguarding, radar/CNS, MOD, NATS, Met Office radar and military low flying. The Scoping Report cites CAP 764 Version 6 (2016).

#### *Summary of Consultation responses.*

Bradnop and Ipstones Parish Councils request assessment of aviation lighting/dark-sky effects and cumulative night-time lighting. Natural England requires the whole development and interrelated landscape/ecological effects to be considered.

#### *LPA Opinion*

SCOPE IN – ASSESSMENT MUST REFERENCE CORRECT AND UPDATED GUIDANCE

Impacts on aviation and from aviation lighting should remain scoped in. The assessment must use current CAA guidance and the lighting solution must be integrated with LVIA, ecology and residential amenity assessment.

- Use current Civil Aviation Authority CAP 764. At the date of this draft the current publication is Version 7 (17 December 2025), not Version 6 cited in the report.
- Consult affected aerodromes, NATS, MOD/DIO, Met Office and other aviation stakeholders identified through safeguarding analysis.
- Assess physical safeguarding, radar/CNS interference, military low flying and any deliverable technical mitigation.
- Define the maximum/final likely obstacle-lighting scheme and assess intensity, visibility, synchronisation, permitted mitigation/controls and night-time visual effects. Consider ecological lighting effects and residential dark-sky/light intrusion where a pathway exists.
- Describe construction-crane/temporary aviation safeguarding where relevant even if this does not require a separate significant-effects assessment.

### **Traffic, transport and Public Rights of Way**

#### *Summary of Applicant position.*

The applicant proposes to scope Traffic and Access out of the EIA and instead submit a Transport Assessment, Abnormal Loads Assessment and Outline CTMP. The Scoping Report estimates around 50 abnormal-load trips before a candidate turbine is known and acknowledges that PRoW users and nearby residents may experience effects reaching the 'major' category during construction/decommissioning.

#### *Summary of Consultation responses.*

SCC Highways requires a Transport Assessment and CTMP covering construction duration/intensity, vehicle types/numbers/routes, effects of large vehicles on narrow lanes, access works and operational visits; it states Bradshaw Lane is narrow/single track and local widening or passing bays are likely to be required. SCC Rights of Way requires a Definitive Map search, all routes shown and labelled, no unauthorised obstruction and proper temporary/permanent diversion processes. The Ramblers identify Ipstones paths 29, 33, 34, 38, 39 and 104. Bradnop and Ipstones Parish Councils seek full construction/abnormal-load/rural-lane and access-work assessment. Staffordshire Wildlife Trust do not agree with the scoping out of "Traffic and Transport" of the EIA (or EcIA) and ES as there are potential ecological impacts that need full consideration.

#### *LPA Opinion*

SCOPE IN - DO NOT AGREE THAT CONSTRUCTION/DECOMMISSIONING SHOULD BE SCOPED OUT

The Scoping Report identifies potentially major effects. Construction and decommissioning traffic/access/PRoW effects therefore require EIA-level assessment, supported by the TA, abnormal-load work and CTMP.

Ancillary Infrastructure Footprint: The EcIA must fully assess the localized ecological impacts of grid connection routes, substations, transformer pads, on-site access tracks, and temporary construction compounds.

Bradshaw Lane and Rural Transport Corridors: To accommodate the delivery of oversized turbine components (max tip height 196m), the applicant must explicitly map and quantify the ecological losses along the proposed transport access routes. Any required physical widening of rural lanes, removal of species-rich hedgerows, or dismantling of historic drystone walls along Bradshaw Lane and surrounding corridors must be detailed. Any removed trees or hedgerows will require a minimum 3:1 replacement ratio using native,

locally characteristic woody species, alongside full structural restoration of any dismantled stone walls.

- Assess impacts from construction/decommissioning traffic changes and relevant environmental effects including HGV flows, severance, pedestrian/cyclist/equestrian amenity, fear/intimidation, road safety, delay where material, PRoW amenity/safety and temporary access restrictions.
- Confirm delivery and abnormal-load routes from port/strategic road network to site, undertake route-drive/swept-path assessment and identify all temporary/permanent highway works, structures, street furniture, vegetation removal, drainage works, widening/passing bays and reinstatement.
- Provide the construction programme, vehicle types/sizes/numbers and daily movement profile requested by SCC Highways. Agree traffic count locations, assessment links/junctions and survey periods with the Highway Authority.
- Assess environmental effects of any Bradshaw Lane widening/passing bays and other off-site highway works in the relevant ecology, arboriculture, landscape, heritage, drainage and land chapters.
- Search the Staffordshire Definitive Map and show/label every PRoW across/adjacent to the site and access. Specifically reconcile the applicant's listed routes with the Ramblers' references to Ipstones 29 and 33 as well as 34, 38, 39 and 104, and any others identified by SCC.
- Maintain routes wherever practicable. Where temporary closure/diversion is necessary, explain the legal process and programme; any permanent diversion must provide an appropriate alternative and be separately authorised. Planning permission itself does not authorise obstruction.
- Assess cumulative construction traffic with other committed/reasonably foreseeable development where routes/programmes overlap.
- Routine operational maintenance traffic may be scoped out of detailed EIA if the final vehicle profile confirms negligible effects, but it should be described in the ES/TA.

### **Arboriculture, trees and hedgerows**

#### *Summary of Applicant position.*

The applicant proposes to scope arboriculture out of the ES and submit a BS 5837 tree survey, Tree Constraints Plan, Arboricultural Impact Assessment, Tree Impacts Plan and Arboricultural Method Statement/Tree Protection Plan.

#### *Summary of Consultation responses.*

Natural England advises that the site is within an area of ancient woodland and requires impacts on ancient woodland/ancient and veteran trees to be assessed and avoided/mitigated. Bradnop and Ipstones Parish Councils request AIA coverage of tracks/turbines and mapped root-protection areas. SCC Highways' comment that likely access widening may also affect roadside trees/hedges. The SMDC Tree Officer notes that turbines WTG-03 and WTG-06 would not meet the 15m buffer requirement and where ancient woodland is present within or adjacent to the site, the assessment should also consider the potential direct and indirect effects upon the woodland and its associated soils and rooting environment.

#### *LPA Opinion*

SCOPE OUT AS A STANDALONE TOPIC – SCOPE IN AS PART OF AN ASSESSMENT OF CROSS-TOPIC IMPACTS

A separate arboriculture ES chapter is not necessary if the stated BS 5837 documents are submitted and all potentially significant tree/woodland/hedgerow effects are assessed in ecology, LVIA, heritage, hydrology and transport as relevant.

- Survey all trees/hedgerows potentially affected by turbines, tracks, compounds, cabling and off-site access/abnormal-load works, not only those within the turbine field.
- Identify root-protection areas, veteran/ancient trees and ancient woodland buffers and explain avoidance in the design process.
- Cross-reference any removal, pruning or fragmentation effects in EclA, LVIA, heritage and transport assessment.
- Provide an AMS/Tree Protection Plan and restoration/replacement proposals proportionate to the final impacts.

### **Socio-economic effects and tourism**

#### *Summary of Applicant position.*

The applicant proposes to scope socio-economic effects out, considering that the generation of construction employment/spending and operational jobs would be limited and agricultural uses of land largely retained.

#### *Summary of Consultation responses.*

No specialist comment or consultation response relative to socio-economic impacts. Parish Council, Natural England and public responses express concerns that impacts on countryside recreation, PRoW, and nationally designated landscape receptors, would have a negative impact on the local tourist economy of the Staffordshire Moorlands and the Peak District national Park.

#### *LPA Opinion*

SCOPE OUT AS A STANDALONE TOPIC – ASSESS WITHIN THE SCOPE OF OTHER RELEVANT TOPICS

On current evidence, a separate socio-economic ES chapter is not required. Recreation/tourism receptors should remain within LVIA, PRoW/transport and heritage impacts where relevant.

- Assess effects on visitor/recreational experience and potential impacts on local tourism economy through the relevant landscape/visual, PRoW and heritage topics.
- Revisit this scope if later consultation/evidence identifies a credible pathway to a likely significant effect on tourism or wider socio-economic climate.

### **Population and human health / residential amenity**

#### *Summary of Applicant position.*

The applicant proposes to scope Population and Human Health out as a separate topic, relying primarily on mitigation of construction noise and separate operational noise/shadow-flicker assessments.

#### *Summary of Consultation responses.*

Bradnop and Ipstones Parish Councils raise property-specific residential amenity concerns from noise, shadow flicker and aviation lighting; Cheddleton Parish Council also identifies impacts on residential amenity as a primary concern. Natural England requires assessment

of relevant emissions/externalities and their interrelationship with residential properties. These representations do not, by themselves, require a separate generic health chapter if the pathways and impacts on residents are fully assessed elsewhere. The majority of public responses point to the proximity of their homes to the position of proposed turbines and express concern about impacts from oppressive visual intrusion, shadow flicker and operational noise and the effects of those impacts on amenity, living conditions, and mental health.

*LPA Opinion*

**SCOPE OUT AS STANDALONE CHAPTER – ASSESS WITHIN THE SCOPE OF OTHER RELEVANT TOPICS**

A separate population/human-health chapter may be scoped out, provided all relevant effects on people and residential amenity are assessed in the appropriate technical chapters and a short ES cross-reference considers the combined effects of these impacts on residential amenity.

- Cross-reference operational/construction noise, shadow flicker, RVAA, aviation/night lighting, traffic/PRoW, construction dust and any water-supply effects that act on residential receptors.
- Use a property-specific assessment where the relevant technical methodology requires it. The Council does not adopt a requirement for individual assessment of every dwelling within the broad ZTV; the receptor set must be justified topic by topic.
- Identify combined effects where the same receptor may experience several changes (for example visual, lighting, noise and traffic) and explain significance in a proportionate manner.
- Identify any particularly sensitive receptor groups where the technical evidence demonstrates relevance.

**Climate change and greenhouse gases**

*Summary of Applicant position.*

The applicant proposes to scope Climate out, stating that renewable generation will contribute to decarbonisation and that drainage, ecology and landscaping will take future weather conditions into account.

*Summary of Consultation responses.*

Natural England expressly advises that the ES should consider climate-change adaptation/resilience of the natural environment, nature-based solutions and effects on carbon storage/sequestration. The Environment Agency requires climate-change allowances in the FRA. Parish councils also reference the climate/flood-risk policy context.

*LPA Opinion*

**DO NOT AGREE TO FULL SCOPE-OUT – A PROPORTIONATE ASSESSMENT IS REQUIRED**

A proportionate climate/GHG and resilience assessment is required. Renewable generation benefits should not remove project lifecycle emissions or climate-vulnerability effects from consideration.

- Provide a proportionate assessment of material project greenhouse-gas emissions, including construction materials/foundations, turbine manufacture/transport where data are

reasonably available, construction traffic, land-use/soil effects, maintenance and decommissioning.

- If avoided emissions or carbon payback are presented, state the comparator, assumptions, grid-intensity data and methodology transparently and distinguish the claimed benefit from project-generated emissions.
- Assess the development's resilience/vulnerability to relevant future climate hazards, including intense rainfall/flooding, storms/high winds, temperature/drought and associated ecological/infrastructure risks, using current projections/guidance.
- Assess effects on the natural environment's capacity to adapt and to store/sequester carbon, as requested by Natural England, including soil/habitat changes and nature-based solutions.
- Identify design/mitigation measures to reduce GHG emissions and improve resilience. The treatment may be a concise chapter or integrated section, but the complete topic should not be omitted.

### **Air quality**

#### *Summary of Applicant position.*

The applicant proposes to scope Air Quality out, acknowledging temporary construction dust and nearby human/ecological receptors but relying on standard controls and negligible operational emissions.

#### *Summary of Consultation responses.*

Natural England advises that the ES should take account of air-pollution risks to protected habitats and current screening/advice. The Environment Agency does not request a standalone air quality chapter but expects relevant environmental matters to be addressed. The level and impacts from Construction traffic remain uncertain because the transport scope is not yet resolved.

#### *LPA Opinion*

SCOPE OUT AS STANDALONE CHAPTER, SUBJECT TO SCREENING

A full standalone air-quality topic is not presently justified, but construction dust, traffic emissions and ecological air-pollution pathways must be screened using final construction/traffic data and addressed where relevant.

- Provide a construction dust risk assessment/mitigation schedule proportionate to the final works and receptors, secured through the CEMP.
- Cross-reference effects on Combes Valley SSSI, ancient woodland and other sensitive habitats where dust or traffic emissions could create a pathway.
- Screen construction traffic emissions under current guidance when routes/HGV numbers are known. If screening thresholds or site-specific sensitivity indicate possible significant effects, provide the necessary assessment.
- Routine operational vehicle emissions may be scoped out if maintenance traffic remains negligible.

### **Major accidents and disasters**

#### *Summary of Applicant position.*

The applicant proposes to scope this topic out on the basis of the site's remote location and benign operational nature of a wind farm.

#### *Summary of Consultation responses.*

No consultee response identifies a specific major-accident/disaster pathway requiring a dedicated chapter. The Coal Authority identifies the site as Development Low Risk. Flood/extreme-weather and aviation matters are, however, relevant to other topics. Local residents responding to the public consultation, point to the proximity of the dwelling at

Barnfield to WTG-04. Residents calculate that the dwelling would be within the extent of the turbine's topple distance if it were to collapse with rotor blade in a vertical position.

#### *LPA Opinion*

##### **SCOPE OUT AS STANDALONE TOPIC**

A dedicated chapter may be scoped out, but the ES/project description and application should briefly identify and assess relevant accident/disaster risks with particular reference to the risks of a turbine toppling onto a resident's home.

- Briefly consider site-relevant extreme weather/flooding, fire/lightning, structural/blade/ice safety, construction/abnormal-load incidents and aviation/emergency-response matters where capable of environmental effects.
- Cross-reference current design standards, emergency procedures and the flood/climate/aviation assessments rather than duplicating them.
- Revisit if final technology or consultation reveals a material environmental risk pathway.

#### **Heat and radiation**

##### *Summary of Applicant position.*

The applicant proposes to scope Heat and Radiation out because the wind farm would not be a significant source of either.

##### *Summary of Consultation responses.*

None of the consultee response identify a likely significant heat/radiation effect.

#### *LPA Opinion*

##### **SCOPE OUT**

No separate EIA assessment is required on the information currently available. Telecommunications/electromagnetic interference to be addressed as a separate topic.

#### **Material assets, utilities and waste**

##### *Summary of Applicant position.*

The applicant proposes to scope Material Assets out, with impacts on telecommunications and aviation assessed separately and transport impacts assessed in standalone technical reports. The report states that project materials would be recyclable as far as reasonably practicable.

##### *Summary of Consultation responses.*

Severn Trent advises that wastewater network/treatment capacity may require further consideration and improvement once the build programme and flows are known and requires protection of public sewer/water assets. Natural England requires the impacts from the whole development/supporting infrastructure to be assessed. The Parish Councils identify the grid connection as an omitted associated-infrastructure issue.

*LPA Opinion*

**SCOPE OUT AS STANDALONE TOPIC – ASSESS WITHIN THE SCOPE OF OTHER RELEVANT TOPICS**

A dedicated material-assets chapter is not necessary if utilities, transport, telecoms/aviation, materials/waste and grid infrastructure are adequately described and assessed in the relevant ES sections.

- Identify Severn Trent assets potentially affected by works and engage with Severn Trent before any diversion/build-over or public sewer connection. Explain construction welfare/wastewater arrangements and any likely network demand.
- Describe principal material and waste streams and apply the waste hierarchy. Avoid unsupported absolute claims that all materials will be recyclable.
- Cross-reference embodied/material emissions to the climate/GHG assessment and highway/electrical/telecom/aviation assets to their relevant topics.

**Grid connection and associated infrastructure**

*Summary of Applicant Position.*

The Scoping Report states that the development includes infrastructure for connection to the existing electricity network and identifies a substation/control building, but it does not define the external grid connection route or method.

*Summary of Consultation Responses.*

Bradnop and Ipstones Parish Councils identify this as a significant omission and are concerned by the potential effects from either underground cabling or overhead infrastructure. Natural England advises that the ES should consider the implications of the whole development proposal, including all supporting infrastructure.

*LPA Opinion*

**SCOPE OUT AS STANDALONE TOPIC – EXTENT OF WORKS MUST BE DEFINED AND ASSESSED UNDER OTHER RELEVANT TOPICS**

The planning application and ES must clearly define which grid/electrical connection works form part of the project being consented and must assess their effects. Any separate but reasonably foreseeable grid project must be addressed cumulatively on the extent of information that is reasonably available and can be provided in advance.

- Show all on-site/within-application cabling, substation/control infrastructure, transformers, access, compounds and connection works and assess them under the relevant ecology, landscape, heritage, water/soil, noise, traffic and climate topics.
- If the external grid connection is to be separately consented, identify the anticipated point/method/route corridor so far as known, explain the separate consenting process and assess cumulative/in-combination effects where it is reasonably foreseeable and sufficient information exists.
- Do not artificially divide integral infrastructure from the development merely to avoid assessment. Equally, this opinion does not require detailed assessment of an unknown third-party project for which no meaningful route/design information exists; uncertainty and future assessment responsibility should be transparently explained.
- Update the whole-development assessment if the connection solution becomes materially defined before the wind-farm application is submitted.

## **7. Cumulative effects and interrelationships**

The cumulative baseline in the Scoping Report is internally inconsistent. It identifies the existing three-turbine Garstones Farm wind farm just over 1 km north-east of the site and a proposal to upgrade one turbine, but the noise chapter states that no other wind-energy developments were identified within 5 km. The ES must use a single current and internally consistent cumulative-development schedule, with topic-specific additions where appropriate.

Natural England specifically advises that existing completed projects, approved but uncompleted projects, ongoing activities, submitted projects under consideration and reasonably foreseeable projects should be considered where information permits, and that landscape assessment should include relevant proposals at scoping stage. The existing Garstones Farm turbines must therefore be included wherever there is a realistic cumulative pathway, including landscape/visual and noise; any live Garstones proposal should be included according to its planning status and available information at the agreed cut-off date.

The cumulative schedule should be checked immediately before ES submission. Parish references to other turbines on Morridge/Bradshaw Lane should be used as a prompt to verify the current baseline, but schemes should only be included in a particular technical assessment where they meet the agreed status, study-area and effect-pathway criteria.

The ES should explicitly address interactions between topics, particularly: aviation lighting with landscape/visual, ecology and residential amenity; access/traffic with noise, air quality, PRoW, ecology, trees, heritage and drainage; hydrology with ecology; landscape with heritage setting; soils/land with BNG and carbon; and grid infrastructure with all relevant topics.

## **8. Environmental Statement presentation and supporting documents**

- The ES structure proposed in Scoping Report Section 7 is broadly acceptable. Include a clear scoping matrix showing every topic/receptor as IN, OUT or addressed in a standalone report and explain any departure from this opinion.
- Standalone technical reports may support the ES, but where the effect remains within EIA the ES must summarise methodology, likely significant effects, mitigation and residual effects rather than rely on an uncross-referenced report.
- All figures should show the same final application boundary/infrastructure and be legible at the stated scale. Provide detailed ZTV/viewpoint mapping as requested by SMDC Conservation. Sensitive ecological data may be supplied confidentially where appropriate.
- Supporting documents should include, as applicable: Transport Assessment, Abnormal Loads Assessment, Outline CTMP, route/swept-path studies, BS 5837/AIA/AMS material, FRA/drainage strategy, WFD screening, controlled-waters preliminary risk assessment, BNG metric/plan, EcIA/ornithological/bat technical reports, heritage desk-based assessment/fieldwork, noise report, RVAA/night-lighting assessment and CEMP/LEMP.

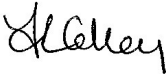
- Include a consultation log explaining how each relevant consultee request has been addressed or, where not adopted, why the final methodology remains proportionate and robust.
- Natural England must be consulted on the eventual ES. The applicant should also continue early technical engagement with SCC Highways/PRoW, Environment Agency/LLFA, SMDC Conservation, Environmental Health, PDNPA, aviation bodies, utilities and other relevant consultees.

## **9. Conclusions**

We trust the above clearly sets out the Scoping Opinion of Staffordshire Moorlands District Council. Please be advised that the scope of the EIA will need to be kept under review and modified, for example, if there is a material change in the project or baseline conditions, if new information comes to light and/or new environmental impacts are identified that have the potential to be significant.

However, should there be any matters arising, please do not hesitate to contact us.

Yours sincerely,

X 

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Signed by: Jane Colley Signature

**On Behalf of Staffordshire Moorlands District Council**

## **APPENDIX A**

### **Padwick Wind Farm Scoping Report — consolidated schedule of errors, anomalies and omissions**

| Priority | Issue                                                          | Detail                                                                                                                                                                                                                                                                                                                                        |
|----------|----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1        | Noise assessment built on superseded guidance                  | The noise methodology relies throughout on ETSU-R-97, replaced by the DESNZ guidance ARWTN on 19 June 2026 — six days before the Report's cover date. Paragraphs 4.6.32 and 4.6.38 are positively out of date on the Report's own date.                                                                                                       |
| 2        | No grid connection identified                                  | No cable route, substation or battery storage is identified anywhere, for a 49.9 MW generating station.                                                                                                                                                                                                                                       |
| 3        | Traffic & Access scoped out despite major impacts              | The chapter acknowledges potentially “major” effects yet recommends the topic be scoped out. In the order of 1,000 ready-mix lorries for the bases, plus turbine components, cranes, waste and workforce, would be required. The Report's trip estimate was also made before the turbine was chosen.                                          |
| 4        | Incorrect statement that no further wind farms lie within 45km | Paragraphs 2.2.4 and 4.3.39 state that no further wind farm applications were identified within 45km. This is incorrect: the Garstones Farm proposal approximately 1km north-east (references SMD/2025/0149 and SMD/2026/0232) was confirmed by the Council itself to require EIA on 22 June 2026, three days before the Report's cover date. |
| 5        | Material copied from unrelated projects                        | The site layout drawing carries the title block of a Spanish solar company in Madrid; the LVIA cites Lancashire County Council for the Definitive Map of Rights of Way; private water supply consultation names “Staffordshire Borough Council”.                                                                                              |
| 6        | Wrong EIA Schedule reference                                   | Paragraph 1.1.2 cites thresholds under “3(j)”; wind farms fall under Schedule 2 paragraph 3(i).                                                                                                                                                                                                                                               |
| 7        | Site area inconsistency                                        | Described as approximately 148 ha and also as approximately 1.6 km <sup>2</sup> . 148 ha = 1.48 km <sup>2</sup> (an ~8% discrepancy).                                                                                                                                                                                                         |
| 8        | Population & Human Health scoped out                           | Scoped out while noise, shadow flicker and traffic impacts on residents are scoped in.                                                                                                                                                                                                                                                        |
| 9        | Peat scoped out                                                | Scoped out on the basis that a later survey will                                                                                                                                                                                                                                                                                              |



| Priority | Issue                                                            | Detail                                                                                                                                                                                                                               |
|----------|------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | prematurely                                                      | establish whether peat is present — i.e. before the evidence that would decide it.                                                                                                                                                   |
| 10       | Peak District National Park Authority not committed as consultee | Not committed despite the Park being ~1.7km away; the strengthened statutory duty toward it is not addressed.                                                                                                                        |
| 11       | Historic England / heritage consultees not committed             | Historic England appears only as the author of cited guidance; the scheme is named after a Grade II listed farmhouse, with Sharpcliffe Hall (Grade II*) nearby.                                                                      |
| 12       | RSPB not a consultee                                             | The RSPB does not appear as a consultee despite the Coombes Valley reserve ~1.9km west.                                                                                                                                              |
| 13       | Bat and protected-species surveys undefined                      | Scoped in but with no methodology, visit numbers or survey seasons committed.                                                                                                                                                        |
| 14       | Rotor diameter never stated                                      | The Report relies on a “ten rotor diameter” shadow-flicker study area it cannot define, and confirms the candidate turbine is unknown.                                                                                               |
| 15       | Private tracks / drive labelled “existing road”                  | Farm tracks and a third party’s private drive (Sharpcliffe Hall) are shown as “existing road”, when parts appear to share the lines of public footpaths (Ipstones 33, 35, 37), making assessable upgrading works appear unnecessary. |
| 16       | “Figure 1.2” referenced but missing                              | Only Figure 1.1 is provided.                                                                                                                                                                                                         |
| 17       | “Figure 2.2” referenced but missing                              | The turbine layout cites Figure 2.2; only Figure 2.1 exists.                                                                                                                                                                         |
| 18       | Figure “4.5” used twice                                          | The same figure number is applied to two different figures (a hydrology map and a landscape figure).                                                                                                                                 |
| 19       | Missing figures and viewpoint appendix                           | The published PDF ends at the caption for Figure 4.1; figures 4.1–4.6 and the viewpoint photography appendix are absent, yet the LVIA relies on them.                                                                                |
| 20       | Duplicated turbine label                                         | The site layout shows eight turbines but only seven labels; WTG-04 appears twice and one turbine is unlabelled.                                                                                                                      |
| 21       | Inconsistent rights-of-way lists                                 | The Landscape and Traffic chapters give different lists of public rights of way crossing the site (Ipstones 39 in one; Ipstones 33 and 40 in the other).                                                                             |
| 22       | “Error! Reference source not found.”                             | Section 4.4.30 contains an unresolved Word cross-reference.                                                                                                                                                                          |

| Priority | Issue                                                  | Detail                                                                                                                                                                                                                                                                                                                                                                                               |
|----------|--------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 23       | Viewpoint distances in kilometres                      | The LVIA viewpoint table shows distances such as “1,216 km”, “8,720 km” and “18,632 km”, evidently missing decimal points.                                                                                                                                                                                                                                                                           |
| 24       | Incomplete coordinate                                  | Viewpoint 13 is listed as “403225, 359264N”, missing the E prefix used elsewhere.                                                                                                                                                                                                                                                                                                                    |
| 25       | “SMBC” / Borough Council used for the District Council | The Report alternates between District and “Borough” Council and “SMBC”.                                                                                                                                                                                                                                                                                                                             |
| 26       | Incorrect NPPF revision date                           | Paragraph 3.2.1 states the NPPF was “last revised in February 2025”. The substantive revision was published on 12 December 2024; the 7 February 2025 amendment corrected footnote cross-references only and was expressly not a change of policy. A further revised draft NPPF was issued for consultation on 16 December 2025. The stated date is therefore misleading as to the current framework. |
| 27       | Typographical / QA errors                              | “South Pennine Moorse”, “designated sires”, “bare similarity”, “speciesspecific”, and spacing/formatting faults in quotations, indicating inadequate proof-reading.                                                                                                                                                                                                                                  |