

Dealt with by: Environmental Health

Our Ref: SMD/2026/0326

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Date: 11th August 2026

MEMORANDUM: PLANNING CONSULTATION
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LOCATION	Padwick Farm , Bradshaw Lane , Ipstones , Staffordshire , ST13 7NN
PROPOSED DEVELOPMENT	Request for EIA Scoping Opinion - for the proposed development of a wind farm comprising eight turbines.

Potential Areas of Environmental Concern.

1. Construction Impacts (Condition)
2. Operational Noise impacts (Noise impact assessment required)
3. Unexpected Contamination (Condition)
4. Site Restoration (Condition)
5. Security Lighting (Condition)

General Comments

Noise

1. This is a significant wind energy development spread across a large section of Ipstones. It does appear that it would dominate the landscape and potentially the local environmental sound environment if adverse noise is caused. It is essential that the noise impacts are rigorously assessed prior to any planning submission. The cumulative effect of these turbines could cause significant adverse impacts across a large area if the operational noise significantly exceeds current background sound levels. Given the number of turbines and their separation distance, compliance measurements are likely to be difficult to conduct.
2. The scoping document refers to the Government's ETSU-R 97 - 'The Assessment & Rating of Noise from Wind Turbines'. This document has been updated and revised with the new Government guidance document 'Assessment and Rating of Wind Turbine Noise' (ARWTN) 2026, Department for Energy Security and Net Zero. Any future noise impact assessment should take account of this document.
3. ARWTN promotes the good practice guidance produced by the Institute of Acoustics – (A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise). In this refreshed guidance 'noise' limits have not changed, and assessment principles are generally the same as before. It does however introduce new terminology and clarifications.

4. A site-specific noise impact assessment should be undertaken in compliance with both approved documents referenced above and include consideration of the Noise Policy Statement of England. It should take account of all potentially impacted properties in all geographic directions and the relevant background sound levels. This is a relatively remote rural area at the edge of the peak District so the prevailing low background sound levels should be protected in line with the aforementioned documents. It would be expected that background noise monitoring is representative of the area and so conducted over a reasonable length of time rather than short term monitoring
5. Amplitude Modulation is recognised in the ARWTN and the potential for it should be considered in the assessment, a condition (ref. ARWTN) should be imposed if permission is granted to ensure it is considered in any compliance monitoring. Therefore 4.6.39 and 4.6.40 of the scooping report should be amended in any future submission.
6. It would be worth noting our experience is that as turbines have aged so they have become more problematic in operation with parts more difficult to source. This has caused adverse noise emissions and complaint to be caused over a significant range (up to 700m in a recent complaint).
7. Low frequency, ground borne vibration and infrasound do not require assessment.

Advisory Note/ Informative:

Please be aware that the responsibility for safe development and secure occupancy of the site rests with the developer.

- Wind turbine noise assessments should be conducted in compliance with – ‘Assessment and Rating of Wind Turbine Noise’ (ARWTN) 2026, Department for Energy Security and Net Zero.
<https://assets.publishing.service.gov.uk/media/6a32b670e590e5e061c9a16b/wind-turbine-noise-guidance.pdf>

Note section 1.11 - 1.11 It is recognised that wind turbine technology evolves and therefore there is a need for guidance that adequately reflects current wind turbine characteristics and the latest knowledge and practice. As such, it is anticipated that this technical guidance will be reviewed/updated as necessary.

A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise. (Institute of Acoustics)
<https://www.ioa.org.uk/sites/default/files/IOA%20Good%20Practice%20Guide%20on%20Wind%20Turbine%20Noise%20-%20May%202013.pdf>

Noise Policy Statement of England.

And all relevant supporting guidance.

- During any demolition and construction activities (including landscaping) the contractor shall take all reasonable steps to prevent dust formation and prevent any dust formed from leaving the site boundary.

- The control of dust and emissions from construction and demolition Best Practice Guidance, produced by the greater London councils <http://www.london.gov.uk/sites/default/files/BPGcontrolofdustandemissions.pdf>
- Building Research Establishment Guidance Document 'Control of Dust from Construction and Demolition Activities' (BR456)
- If required, Contamination risk assessments shall be carried out in accordance with UK policy the Land contamination risk management framework (LCRM), published by the Environment Agency: <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>
 - Submission of reports should also be made to the Environment Agency for comment with regard to their remit to protect ground and surface waters from pollution and their obligations relating to contaminated land.
 - The Local Planning Authority will determine the acceptability of reports on the basis of the information made available to it. Please be aware that should a risk of harm from contamination remain post development, where the applicant had prior knowledge of the contamination, the applicant is likely to be liable under Part II (a) of the Environmental Protection Act 1990 and as such become an "appropriate person". In this event the applicant will be lawfully responsible to remove the risk posed by the contamination.
 - Equally if during any site works a pathway for any contaminant on site is created and humans, waters, property or ecological systems are exposed to this, the applicant or those acting on behalf of the applicant will be liable under part II (a) of the Environmental Protection Act 1990 if the risks are not adequately addressed during the site redevelopment.
 - During investigation and remediation works the applicant and those acting on behalf of the applicant must ensure that site workers, public property and the environment are protected against noise, dust, odour and fumes
 - The applicant is advised that should there be a requirement as part of the Remediation Strategy to treat, reuse or remove contaminated material on the site, the Environment Agency must be consulted, as these activities may need to be licensed or permitted. Contaminated materials identified for removal off site must be disposed of in an appropriately licensed landfill site.
 - Staffordshire Moorlands District Council is keen to liaise with all stakeholders involved in this application. As such, we recommend that a proposed scope of works is forwarded to the Environmental Protection Department and agreed in principle prior to site investigation works being undertaken. The Environmental Protection Department is also prepared to review draft copies of reports prior to final submission to the Planning Department in order to ensure that works undertaken are sufficient to discharge the contaminated land conditions.

Regards,
Environmental Health