

Dealt with by: Environmental Health

Our Ref: SMD/2025/0212

Direct Dial:

Your Ref: as above

Email:

Date: 17th June 2025

MEMORANDUM: PLANNING CONSULTATION

LOCATION

Land to the North of
Moorside Farm Eaves Lane
Armshead

PROPOSED DEVELOPMENT

**CHANGE OF USE OF LAND TO A 2 PITCH FAMILY
GYPSY & TRAVELLER SITE - RETROSPECTIVE -
RESUBMISSION OF PLANNING APPLICATION
SMD/2024/0486**

Potential Areas of Environmental Concern.

1. Construction and Demolition Impacts (Condition)
2. Importation of soil or fill material (Condition/ Insufficient information)
3. Lighting (Condition)
4. Drainage (Insufficient Information)
5. Commercial Noise (Insufficient Information)

General Comments as per smd/2024/0486

Drainage and Licence Comments -To make a full assessment of the site we require more detail on the wastewater disposal on the site, main drainage and/or septic tank details. If planning permission was to be approved the site would also need a site licence as a 'Park Home' and would need to meet the conditions of that licence and any additional legislation applicable.

Amenity: Primary concerns are noise and lighting.

Any lighting installed should be so selected, positioned and directed so as not increase pre-existing luminance levels at any neighbouring property, all lighting should be and be complaint with the Institute of Lighting Engineers Guidance on Excessive Luminance. (Condition on request)

From a noise perspective if the site for domestic residential use only then commercial noise can be removed as a concern, we would advise a prohibition on commercial use is made a condition of occupation if permission is granted. If commercial use is proposed then a noise impact assessment should be submitted.

Fill and soil importation - No information is provided on the source of the material which is used for the hardstanding. This should be made a condition of development. (Condition on request)

Recommendation and Conditions

The Environmental Health Department recommend refusal due to insufficient drainage information (Drainage Officer advice)

Advisory Note/ Informative:

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

- Any approved noise scheme and measurements should pay due regard to the Professional Guidance on Planning and Noise (ProPG), British Standard BS8233: Sound insulation and noise reduction for buildings (Code of Practice), BS4142:2014 Methods for rating and assessing industrial or commercial sound and/or the Building Regulations 2010 Document E or other appropriate guidance
- Any approved foul drainage system should meet the British Standard 6297:2007+A1:2008: Code of practice for the design and installation of drainage fields for use in wastewater treatment <http://www.bsigroup.com>
- Advice on controlling flies and light can be found in: Statutory Nuisance from Insects and Artificial Light (defra 2005) available as a free download <http://archive.defra.gov.uk/environment/quality/local/legislation/cnea/documents/statnuisance.pdf>
- The lighting scheme should comply with the Institution of Lighting Professionals Guidance Note for the reduction of obtrusive light 2011 (or later versions). It should be designed so that it is the minimum needed for security and operational processes and be installed to minimise potential pollution caused by glare and spillage.

Illuminated area m ²	Zone E1	Zone E2	Zone E3	Zone E4
Up to 10.00	100	600	800	1000
Over 10.00	n/a	300	600	600

Environmental Zones			
Zone	Surrounding	Lighting Environment	Examples
E0	Protected	Dark	UNESCO Starlight Reserves, IDA Dark Sky Parks
E1	Natural	Intrinsically dark	National Parks, Areas of Outstanding Natural Beauty etc.
E2	Rural	Low district brightness	Village or relatively dark outer suburban locations
E3	Suburban	Medium district brightness	Small town centres or suburban locations

E4	Urban	High district brightness	Town/city centres with high levels of night-time activity
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The guidance advises that, where an area to be lit lies on the boundary of two zones or can be observed from another zone, the limits used should be those applicable to the most rigorous zone.

- 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 Health Department and agreed in principle prior to site investigation works being undertaken. The Environmental Health 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