

Dealt with by: Environmental Health

Our Ref: SMD/2024/0423

Direct Dial: [REDACTED]

Your Ref: *as above*

Email: n/a

Date: 6th February 2026

MEMORANDUM: PLANNING CONSULTATION

LOCATION	Greenfields Thorney Edge Road Bagnall
PROPOSED DEVELOPMENT	Battery Energy Storage System and substation with associated infrastructure and works

Potential Areas Of Environmental Concern.

1. Construction Impacts (Condition)
2. Unexpected Contamination (Condition)
3. Artificial Lighting (Condition)
4. Plant and Machinery Noise (Condition)
5. Battery Leakage (Condition)
6. Coal Mining Area (Low Risk)
7. Fire Risk (Consult Staffordshire Fire Services)

General Comments Revised

Documents considered –

1. Addendum to Environmental Statement January 2026
2. Noise measurements - Greenfields BESS – Hourly Measurement Data
3. Environmental Statement Section 7.6 – Mitigation Measures
4. Acoustic Barrier details (5.5m high) (Fig.3-8)
5. Soft Landscaping Plan – Drawing no. 9258_101E (Fig. 3-10)

Noise: A revised noise impact assessment has been submitted in the Addendum to Environmental Statement January 2026. It contains revised impact levels based on a revised layout, bunding, lower noise plant and cumulative impact considerations.

1. BS4142 Assessment - The non-cumulative BS4142+A1:2019 assessment for day and night noise impacts are set out in Table A7-24 and A7-25. These indicate no exceedance over daytime levels and low-level exceedance during the night at NSRs 1,2,4, 5 and 7. The specific noise impact levels table A7-22 are predicted to be low and allowing a 12db noise reduction for an open window should mean sleep should not be disturbed.

2. The overall cumulative impacts for all NSRs are summarised in Table A7-26. The predicted cumulative impacts for likely impacted NSRs 3, 4 and 5 are assessed in table A7-31. These cumulative impacts predict low level impacts over background.

3. The assessment determines there is no tonal, intermittent or impulsive character in the predicted noise, so no acoustic penalty is applied.

4. The predicted rating levels and background sound levels for each property are set out in the table below, reference is made to BS4142 and Cumulative assessments Tables A7-24, 25 and 31. –

NSR	Daytime Rating (dBA) 07:00-23	Background La90 (dB)	Nighttime Rating (dBA)	Background La90 (dB)
1	28	36	28	27
2	29	37	29	28
3	25 (*29.7)	35	25 (*30)	28
4	29 (*29.8)	35	29 (*30)	28
5	29 (*29.6)	35	29 (*30)	28
6	24	36	24	27
7	29	36	29	27

* Cumulative Impact Levels - Rounded Up/Down

5. Mitigation – The mitigation set out in Section 7.6, figure 7-6 and tables 7.19 and 7.20 of the Environmental statement and paragraph 0.5.30 of the Environmental Addendum January 2026 should be completed in full. All mitigation should be assessed by the developer's acoustician prior to installation.

6. We have advised 2 proposed conditions to take account of the advice in the January 2026 addendum and to protect amenity. 1. Predicted boundary levels enabling quick compliance assessment by the operator and regulator at 40dBA and 2. A condition relating to compliance with BS4142+A1:2019 criteria and takes account of predicted cumulative impact levels. A fixed rating level of 30dBA for all properties would ensure amenity is protected and mean compliance measurement simplified for operator and regulator.

Note alternatively a condition requiring compliance with Environmental Addendum January 2026 tables A7-24, A7-25 and A7-31 might be imposed along with a requirement to undertake compliance testing.

7. Low frequency noise (LFN) has been raised as a potential issue with these developments, but no advice has been provided to address these concerns, but no definitive evidence has been provided to support the concerns. The compliance test would be expected to assess evidence of any tonal noise under the assessment requirements of BS4142 and impose an acoustic correction if required.

Nuisance (Construction): Conditions advised.

Lighting: Condition advised.

Contamination: Unexpected contamination and battery leakage conditions advised.

Recommendation

Environmental Health do not object to the application based on the revised submission but raise concerns about the significant number of BESS sites already approved for this area. It would be preferable for already approved sites to be constructed and operated in order that

their actual impacts are known or in situ supporting assessment submitted. If permission is granted, we would advise the following conditions are imposed on the development.

Conditions if permission granted

1. Construction & Demolition Impacts:

- I. During construction/demolition phases amplified music and/or radios shall not be audible beyond the site boundary;
- II. Any waste material associated with the demolition or construction shall not be burnt on site but shall be kept securely for removal to prevent escape into the environment. All waste transfer records should be retained for inspection by officers of the Local Planning Authority;
- III. No activity hereby permitted shall cause dust to be emitted beyond the site boundary so as to adversely adjacent residential properties and/or other sensitive uses and/or the local environment. In the event dust is caused to escape the site boundary the activity shall be stopped until sufficient dust suppression has been undertaken to prevent further escape. There shall always be the appropriate means and sufficient water resources on site for dust suppression. These should be made available for inspection when required by officers of the Local Planning Authority

Reason: *To protect the amenities of the area during construction*

Construction & Demolition works: Time of operations

2. Unless prior permission has been obtained in writing from the Local Planning Authority, all noisy activities shall be restricted to the following times of operations.
 - **08:00 - 18:00 hours (Monday to Friday);**
 - **08:00 - 13:00 hours (Saturday)**
 - **No working is permitted on Sundays or Bank Holidays.**

In this instance a noisy activity is defined as any activity (for instance, but not restricted to, building construction/demolition operations, refurbishing and landscaping) which generates noise that is audible at the site boundary.

Reason: *To avoid the risk of disturbance to neighbouring dwellings from noise during unsocial hours.*

3. Report of Unexpected Contamination

In the event that contamination including surface coal measures is found at any time when carrying out the approved development it must be reported in writing immediately to the Local Planning Authority. Development should not continue further until an initial investigation and risk assessment has been completed in accordance with a scheme to be agreed by the Local Planning Authority to assess the nature and extent of any contamination on the site. If the initial site risk assessment indicates that potential risks exist to any identified receptors, development shall not continue until a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment has been prepared, and is subject to the approval in writing of the Local Planning Authority.

Reason *To ensure that the proposed development meets the requirements of the National Planning Policy Framework in that all potential risks to human health, controlled waters and wider environment are known and where necessary dealt with via remediation and or management of those risks.*

4. Boundary Noise Limit

The specific level of sound emitted from the site including all plant and machinery shall not exceed 40db Laeq (15mins) at any time when measured at any point at or beyond the boundary of the site.

Reason: *To ensure that the amenities of the local environment are adequately protected from noise pollution.*

5. BS4142 Limit on external noise levels produced by fixed external plant

(a) The rating level of sound emitted from any fixed plant and/or machinery associated with the development shall not exceed:

- i) During the daytime (07:00-23:00) 30 dBA when measured over 60 mins at the nearest sound-sensitive premises ref. Section 7.3 Figure 7-1 of the submitted Noise Impact Assessment prepared by Savills Job No: 677297 dated 28/08/2024;
- ii) During the nighttime (23.00–07.00) 30 dBA when measured over 15 mins at the nearest sound-sensitive premises ref. Section 7.3 Figure 7-1 of the submitted Noise Impact Assessment prepared by Savills Job No: 677297 dated 28/08/2024;

Where access to the nearest sound-sensitive property is not possible, measurements shall be undertaken at an appropriate location and corrected to establish the noise levels at the nearest sound-sensitive property.

All measurements shall be made in accordance with the methodology of BS4142 (2014 + A1:2019) (Methods for rating and assessing industrial and commercial sound) and/or its subsequent amendments.

Any deviations from the time interval stipulated above shall be agreed upon in writing with the local planning authority.

(b) Prior to first operation of the development, a compliance test should be undertaken by the operator to demonstrate compliance with the required rating sound levels at the properties listed in Section 7.3 Figure 7-1 of the submitted Noise Impact Assessment prepared by Savills Job No: 677297 dated 28/08/2024.

The scheme hereby approved shall not commence operation until all necessary mitigation works are completed and compliance is shown in writing and approved by the Local Planning Authority.

Reason: *To ensure that the reasonable residential amenities of adjoining properties are adequately protected from noise pollution.*

6. Artificial Lighting

Details of floodlighting of the site shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development. The artificial lighting incorporated into this site in connection to this application shall not increase the pre-existing

illuminance or cause glare at the adjoining light sensitive locations (residential) when the light (s) is (are) in operation.

Reason: *To protect the local amenities of the local residents by reason of excess of luminance.*

7. Maintenance of Batteries

All equipment and infrastructure associated with this development must be constructed and maintained throughout the life of the development so as to prevent any discharges or spillage that may cause pollution of the surrounding land, underground strata or watercourses.

Reason: *To prevent pollution of the Environment*

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 + A1: 2019 Methods for rating and assessing industrial or commercial sound and/or the Building Regulations 2010 Document E or other appropriate 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.
- 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