STAFFORDSHIRE
moorlands
DISTRICT COUNCIL
ACHIEVING · EXCELLENCE

Dealt with by: Environmental Health

Our Ref: SMD/2025/0388

Direct Dial: [redacted]

Your Ref*: as above*

Email: [redacted]

Date: 15th May 2026

MEMORANDUM: PLANNING CONSULTATION

LOCATION	**New Buildings Farm , Sandon Road , Sharpley Heath , Stone , Staffordshire , ST15 8SL**
PROPOSED DEVELOPMENT	**Solar farm with ancillary infrastructure, security fence, access, landscaping and designed to allow continued agriculture.**

Potential Areas Of Environmental Concern.

1. Construction Impacts (Condition)
2. Unexpected Contamination (Condition)
3. Artificial Lighting (incl. access and security lighting) (Condition)
4. Plant and Machinery Noise (Adverse impacts predicted)
5. Maintenance of plant and equipment (Condition)
6. Glare (See comments)

General Comments -

Noise:

1. A noise impact assessment has been submitted to assess the noise impacts of the development. It was undertaken by Hepworth Acoustics P23-261-R01 version 2 21/4/26. The background sound levels submitted can be accepted.
2. The assessment has considered the noise impacts in compliance with BS4142+A1:2019 and BS8233:2014.
3. In general evening and nighttime noise impacts are not predicted to cause significant exceedances to background noise levels though there is a predicted low-level impact at location B (Blakelow Farm) +3dB during the evening. Based on these predicted increases over background and the sound levels, there is no obvious adverse impact to residential amenity at these times.
4. But the predicted daytime noise rating level at properties B (Blakelow Farm) and G (Moorilow Moor Farm) would be +7dB and +4dB respectively over current background sound levels, which is a concern. This noise is likely to be audible and cause a change to the existing sound character at these properties especially in gardens. Given this increase in sound levels and the likely audibility of this sound we may have expected an acoustic correction to be applied, meaning a further increase in the predicted noise

rating exceedance over background.

5. The assessment determines this will have a low impact due to context considerations. This is not fully explained for daytime noise impacts.
6. The assessment also uses BS8233:2014 Guidance on Sound Insulation for Buildings to explain the increase in internal levels inside properties would be compliant with criteria sound levels for new build residential properties and so internal amenity will not be compromised. But the use of this standard is not relevant in our opinion in this case as these are existing properties and potentially being subjected to a new audible noise source.
7. There is no obvious mitigation proposed to address these exceedances e.g bunding, screening or a redesign of the layout (relocation of noisy plant). We would advise this is reviewed in any future submision.
8. The NIA cites the National Planning Policy Framework (NPPF), December 2024 and the Noise Policy Statement of England (NPSE) yet doesn't appear to propose mitigation to address the adverse noise impacts predicted. Ref 2.1-2.3 Note 2.4 is not relevant to this application.
9. We would draw attention to the Noise Policy Statement of England (NPSE) paragraphs 2.23.2.24 and 2.25 –

   "2.23 The second aim of the Noise Policy Statement for England Mitigate and minimise adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development.

   2.24 The second aim of the NPSE refers to the situation where the impact lies somewhere between LOAEL and SOAEL. <u>It requires that all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of life</u> while also taking into account the guiding principles of sustainable development (paragraph 1.8). This does not mean that such adverse effects cannot occur.

   The third aim of the Noise Policy Statement for England Where possible, contribute to the improvement of health and quality of life through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development.

   2.25 This aim seeks, where possible, positively to improve health and quality of life through the pro-active management of noise while also taking into account the guiding principles of sustainable development (paragraph 1.8), recognising that there will be opportunities for such measures to be taken and that they will deliver potential benefits to society. <u>The protection of quiet places and quiet times as well as the enhancement of the acoustic environment will assist with delivering this aim."</u>

   No mitigation has been proposed to address the exceedances over background in the BS4142 assessment or protect the pre-existing low background sound levels.

Construction Impacts: Condition.

Unexpected Contamination: Condition.

Lighting: Condition.

Glare: The solar screens should be sufficiently screened so as not to cause glare to any nearby neighbouring properties. It would be advisable that a condition is placed on the permission to ensure where there is potential for glare to impact on neighbouring properties that mitigation steps are taken in the form of screening to prevent this problem.

<u>PTO></u>

Recommendation

The Environmental Health Department recommend refusal due to predicted adverse daytime noise impacts at Blakelow Farm (A) and Moorlaw Moor Farm (G). The noise from the solar farm is likely to be audible and impact amenity at these locations.

Advisory Note/ Informative:

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

- A Demolition or refurbishment asbestos survey and risk assessment should be carried out prior to the demolition of the existing buildings. The enforcing authority for this type of work is the Health and Safety Executive (HSE) and it is recommended that you contact them directly to discuss their requirements: http://www.hse.gov.uk/

- 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.

- Advice on controlling flies and light can be found in: Statutory Nuisance from Insects and Artificial Light (defra 2005) available as a free download https://webarchive.nationalarchives.gov.uk/ukgwa/20130402141656/http://archive.defra.gov.uk/environment/quality/local/legislation/cnea/documents/statnuisance.pdf

- 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 https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance-and-spgs/control-dust-and

  - Building Research Establishment Guidance Document 'Control of Dust from Construction and Demolition Activities' (BR456)

- 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

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.

- 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 Ageny 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 and “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