

Environmental Control and Protection - Planning Consultation Response

To:	Joe Richardson Planning Officer
From:	Vicky Brown Senior Environmental Health Officer
Date:	23.04.2026
Planning Application Reference:	PL/2021/04084
Environmental Health Reference:	PR202406-259843
Description of Proposal:	Residential development of 49 no. new dwellings comprising development on land to the west of Roger Way (Areas A&F), alongside the change of use of the vacant ground floor unit at Block C of the Old Sarum Local Centre (Area G), to provide for 7no. affordable apartments.
Address:	Land to the west of Roger Way and Old Sarum Local Centre (Block C), Old Sarum, Salisbury, Wiltshire
Site Visited:	yes
Recommendation:	Conditions and Informative to be applied to any planning permission granted.

Comments:

In previous consultation responses, including those issued in November 2024 and May 2025, I recommended refusal of the proposal on environmental health grounds. At that stage, I considered that future residents would be exposed to significant adverse impacts from both noise and light during football matches, and that the scheme failed to demonstrate high quality design or appropriate mitigation in accordance with:

- Wiltshire Council Core Policy 57
- The Wiltshire Design Guide SPD
- The National Planning Policy Framework (NPPF)
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Those conclusions were based on the absence of effective, site-wide mitigation and an over-reliance on façade treatments and resident behaviour.

Noise Impact Assessment – January 2026

The latest Noise Impact Assessment considers a revised site layout incorporating a continuous 3 m high acoustic barrier, designed to provide uninterrupted screening between the football ground and the majority of the residential site. This represents a more proactive, design-led approach to noise mitigation, rather than reliance solely on façade treatments or operational controls.

The barrier reduces the propagation of noise from activities on the football ground across the development site, with improvements predicted at a number of dwelling façades and within external amenity areas. The greatest benefit is achieved at ground-floor level and within private outdoor spaces, with more limited mitigation at first-floor level.

Using the agreed internal target noise level of 32 dB LAeq during football matches, the assessment indicates that:

- 65 out of 160 façades (approximately 40%) would require windows to be closed during matches to achieve the target level;
- From appendix C of the noise report it appears all 42 dwellings would be affected in this way;

This position remains less than ideal. However, further examination of the assessment demonstrates that every dwelling benefits from at least one “quiet façade”, on which windows could remain open during a match while achieving the internal target level for habitable rooms. The existence of a quiet façade for each dwelling is a recognised component of good acoustic design and is a material consideration in this case.

The introduction of the 3 m barrier also results in some improvement to predicted noise levels within external amenity areas, when compared to earlier scheme iterations.

It remains the case that football-related noise will be clearly audible across the development. During matches residents will clearly be able to hear the PA, music, and crowd noise including singing, shouting and occasional foul language. For most dwellings the achievement of suitable internal noise levels during matches would still necessitate window closure on at least one façade.

Ordinarily, reliance on residents closing windows would not be considered an acceptable mitigation measure. However, the applicant’s argument that these impacts are limited to intermittent periods when matches or events are taking place, rather than being continuous, is noted.

Lighting Assessment – February 2026

The revised layout and acoustic barrier do not appear to have resulted in any material or consistent improvement in vertical illuminance levels at affected façades.

For dwellings at Plots 1–2 and 23–26, predicted lux levels are marginally reduced compared to the previous lighting report. Conversely, for Plots 15–17, predicted levels have increased; no explanation is provided for this change, and the increase is unexpected.

Notwithstanding the above, the most recent lighting assessment identifies that 9 out of 42 dwellings would have windows on a façade exposed to light levels exceeding those recommended in Institute of Lighting Engineers (ILE) guidance when the floodlights are in operation, in some cases significantly exceeding the 5 lux threshold.

The applicant proposes mitigation in the form of windows with integrated blackout blinds to these façades, enabling residents to control light intrusion when the floodlights are in use. The applicant further notes that floodlighting will be used during periods of darkness, when blinds or curtains

would typically be drawn in any event. These points are acknowledged, albeit they do not remove the underlying exceedance of guidance values or reliance on resident behaviour to mitigate the impact.

Planning Balance and Conclusion

While not a matter directly within my remit as an Environmental Protection Officer, I am mindful of the national and local requirement for housing provision and the role this plays in the overall planning balance.

In planning terms, it is foreseeable that a Planning Inspector could reasonably conclude that, if residential development of 43 dwellings on this site is considered acceptable in principle, the scheme now demonstrates good acoustic design, particularly through the provision of a continuous boundary barrier, identifiable quiet façades, enhanced glazing and mechanical ventilation where required.

Similarly, the provision of integrated blackout blinds for lighting-affected façades, alongside the intermittent nature of floodlighting, would likely be taken into account.

The argument that future residents would reasonably be aware that the site lies adjacent to an operational football ground, and that associated noise and light impacts would be experienced, is also noted. However, it should be recognised that prospective occupants, particularly those in affordable housing, may have limited choice and may not fully appreciate these impacts during viewings held outside match times. I would like to see an informative attached to any planning permission which requires all potential purchasers and occupiers of dwellings to be informed prior to purchase or contract signing that the dwelling is next to an operational football ground and as a result they will experience impacts from noise and flood lights during matches and events at the football ground. They must be informed if the dwelling has been fitted with improved glazing, ventilation or blackout blinds to mitigate these impacts and instructions on how to use these measures must be provided.

In the event of an appeal, should the application be refused on noise or lighting grounds, it is foreseeable that, when weighed against housing need, an Inspector could consider the requirement for limited behavioural measures (such as closing windows or blinds during matches) to be acceptable within the overall planning balance, given the context of the site.

Full consideration of the planning balance rests with the Local Planning Authority. However, in light of the revised mitigation now proposed, it would be difficult to sustain my earlier firm recommendation for refusal on environmental health grounds. In my view, a Planning Inspector may reasonably conclude that sufficient mitigation has now been incorporated to address noise and lighting impacts to an acceptable degree, acknowledging that some residual impacts will remain.

Accordingly, I am content to withdraw my recommendation for refusal on environmental health grounds. Any approval should be subject to robust, detailed planning conditions to ensure that all

identified mitigation measures within the acoustic and lighting assessments are fully implemented, retained and maintained in perpetuity, and that construction-phase impacts are appropriately controlled.

I therefore leave the determination of this application to the judgement of the planning case officer, having regard to the full planning balance. A schedule of recommended conditions and any informative will follow in due course.