

Environmental Control and Protection - Planning Consultation Response

To:	Joe Richardson Planning Officer
From:	Vicky Brown Senior Environmental Health Officer
Date:	30.06.2026
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:

Noise

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

57 of the Wiltshire Core Strategy, the Wiltshire Design Guide SPD, and the National Planning Policy Framework (NPPF).

Those conclusions were based on the absence of effective site-wide mitigation and an over-reliance on façade treatments and resident behaviour to manage impacts.

In April 2026, following the submission of revised mitigation measures, I withdrew my recommendation for refusal. In relation to noise, this was because, on balance, whilst some adverse effects on residential amenity would remain during football matches, those impacts were considered limited to relatively infrequent periods of use and would occur in a location where prospective residents would be aware of the presence of an established football ground. This awareness can be increased by the informative recommended to be attached to any permission granted.

Paragraph 185 of the NPPF requires planning decisions to:

- mitigate and reduce to a minimum potential adverse impacts resulting from noise; and
- avoid noise giving rise to significant adverse impacts on health and quality of life.

The supporting footnote directs decision-makers to the Noise Policy Statement for England (NPSE), which establishes the concepts of the Lowest Observed Adverse Effect Level (LOAEL) and the Significant Observed Adverse Effect Level (SOAEL).

Paragraph 187 of the NPPF and the Planning Practice Guidance (PPG) on Noise apply these principles through the Noise Exposure Hierarchy. This hierarchy provides a practical framework for distinguishing between acceptable adverse effects and significant adverse effects that should be avoided.

For example:

- Below NOEL, noise effects are negligible and generally require no mitigation.
- Between LOAEL and SOAEL, noise may be noticeable and intrusive, resulting in minor behavioural changes such as raising voices in conversation, intermittently closing windows, or occasional sleep disturbance. Such impacts are considered adverse but can be acceptable where appropriate mitigation is secured.
- Above SOAEL, noise causes a material change in behaviour or quality of life, for example requiring windows to remain closed for prolonged periods, regular sleep disturbance, or avoidance of outdoor amenity areas. Impacts at this level should generally be avoided.

The PPG paragraph 11 identifies access to a relatively quiet façade containing habitable room windows as an important mitigating factor. In this case, all dwellings have access to a quieter elevation facing away from the football ground. While occupants of some properties

may choose to close windows on the stadium-facing façade during football matches, alternative windows and ventilation opportunities remain available elsewhere within the dwelling. In my opinion, this places the residual impact closer to the upper end of the LOAEL–SOAEL range rather than within the SOAEL category.

The revised scheme also incorporates a continuous 3 m high acoustic barrier along the site boundary. The acoustic report specifies a barrier construction with a superficial mass of 10–15 kg/m², which is typical of a purpose-designed acoustic fence. Where the barrier interrupts the line of sight between the noise source and receptor, reductions of up to approximately 10 dB can reasonably be expected.

Comparison of the submitted contour plots suggests that many plots, which I have attached in Annex A, achieve a reduction of approximately 3–8 dB(A) when compared with the earlier partial-barrier arrangement. Acoustically, a 5 dB reduction is generally clearly perceptible, whilst a 10 dB reduction is commonly perceived as approximately halving the loudness of the sound. The barrier therefore represents a meaningful improvement over the previously submitted scheme and contributes significantly towards reducing residual noise impacts.

Future Intensification of Stadium Use

The football club has submitted representations indicating that the club has been sold and that a future 4G pitch and replacement floodlighting system are being considered. The club also indicates that, following installation of a 4G pitch, training activities may be consolidated at the stadium, resulting in more frequent use of the facility.

At present, no planning application has been submitted for either a 4G pitch or replacement floodlighting and these proposals cannot therefore be taken into account directly in determining the current application.

Nevertheless, the Agent of Change principle within Paragraph 009 of the PPG requires consideration of not only existing activities but also activities that a facility is already permitted to undertake, even where those activities are not currently occurring.

The football ground benefits from existing planning permissions that permit evening operation, subject to conditions. Permission S/1994/0797 restricts operational use between 23:30 and 06:00 Sunday to Thursday (including public holidays) and between midnight and 06:00 on Fridays and Saturdays. Existing floodlighting is permitted until 22:00 under permission S/2000/0979.

The football club's suggestion of substantially increased training activity appears principally linked to the potential installation of a 4G pitch. Such a surface would support significantly greater usage than a natural grass pitch. However, with the proposed 3 m acoustic barrier and garden boundary treatments in place, the applicant's assessment indicates that noise from training activities would remain below Sport England's desirable upper guideline value

of 50 dB LAeq,1hr within residential gardens. While this part of the acoustic report could be more detailed, in my professional opinion if noise from a football match is calculated to be below 55dB (LAeq (T)) then training would be below 50dB LAeq(T) as training is significantly less noisy than a match.

It should also be recognised that any future 4G pitch proposal would affect both the proposed dwellings and the surrounding established residential area and would be subject to separate planning consideration if and when submitted.

Lighting

Whilst reliance on integrated blackout blinds would not ordinarily represent the preferred design solution, the circumstances of this case are unusual. The requirement for such mitigation is limited to a relatively small number of façades and is associated with periods when football floodlighting is operating during hours of darkness. In practice, these will often coincide with times when residents would be expected to have curtains or blinds closed in any event.

I therefore consider that the residual lighting impacts, although adverse, are unlikely to reach a level where significant adverse effects on health or quality of life would occur. In my professional opinion, the impacts fall between the LOAEL and SOAEL thresholds and are capable of being mitigated through the proposed measures.

The football club's representations raise a number of technical points regarding the lighting assessment. Having reviewed these comments, I do not consider any of them fundamentally alter the conclusions of the assessment.

I will address the technical points raised below:

1. *'Plots 15 and 26 are believed to be of the Silverdale (Sv) design. These two plots are subject to 42.7 Lux and 37.3 Lux respectively. The floorplan for this design is not included in the current application. As such the number of windows impacted cannot be assessed.'*

I have highlighted to the planning Officer that these layouts are either missing or difficult to find. However, in terms of lighting impact the impacted façade on the Noise and light mitigation plan is marked for having integrated blackout blinds.

2. *'The assertion at Ref A Para 3.1.3 that the area would be classified as E2 Rural, low district brightness is misleading and not applicable during a floodlit football match.'*

E2 would be the classification when there is no football match on and provides more conservative limits than using a zone when football matches are on which would be E4. Arguably the area without the football lights on could be classified as E3 Suburban which would provide less conservative limits. However, when the lights are on vertical illuminance limits for all zones are exceeded at the facades that require blinds.

3. *'Simple geometry will confirm that a 3M wooden fence will not protect against light spill in the plots with windows facing the football pitch 44M from the pitch edge as suggested in Ref A, Para 4.7 Bullet 1.'*

The 3m high fence does not provide notable mitigation to light impacts for most of the site. The integrated blackout blinds are the main mitigation for this.

4. *'The calculated Football Pitch Surface Horizontal Illuminance values in Annex A to Ref A have reduced in Rev 7 from the values in Rev 4, which in turn were reduced from Rev 3. This is not understood since the floodlights have not changed and should be checked.'*

The applicants agent has provided a response to this: *'The lighting modelling and calculations have been carried out using consistent information across all revision reports issued by our consultant, SHD Lighting. As a result, the floodlight specification has remained unchanged throughout. The discrepancies noted in earlier reports relate solely to coordinate references generated by the modelling software. These should be disregarded, as each update to the site layout requires the lighting consultant to redraw all lighting components from scratch, which can introduce minor coordinate variations but does not affect the technical outcome. I agree that minor changes like this do not affect the technical outcome.'*

5. *'All the plots in Annex A to Ref A are illegible when printed and remain so when the pdf files are viewed at maximum.'*

I can see the detail when zoomed in on the PDF.

6. *'The luminaire list at Ref A, Annex A, Page 7 is incorrect. The impact on the Persimmon modelling is unknown and should be checked.'*

I have asked the applicant for clarification regarding the accuracy of the luminaire list.

Overall, whilst the scheme remains reliant on mitigation measures that would not ordinarily represent best practice, I am satisfied that the residual lighting effects would not justify refusal on environmental health grounds.

Conclusion

The revised scheme remains a challenging proposal due to its proximity to an established football ground. Future occupants will experience some adverse impacts associated with football matches. However, planning policy does not require the complete elimination of all adverse effects. Rather, the NPPF and NPSE require significant adverse effects to be avoided and lesser adverse effects to be mitigated and reduced to a minimum.

Compared with the earlier iterations of the proposal, the applicant has now provided a substantially improved package of mitigation comprising a continuous 3 m acoustic barrier,

quiet façades, mechanical ventilation where required, and integrated blackout blinds to affected elevations. Taken collectively, these measures reduce the predicted impacts and place the development within the range of effects that, in my professional opinion, fall between the LOAEL and SOAEL thresholds rather than constituting significant adverse effects.

Having regard to the Noise Policy Statement for England, the Planning Practice Guidance on Noise, paragraphs 185 and 187 of the NPPF, and the Agent of Change principle, I do not consider that the residual noise or lighting impacts are sufficient to justify refusal of the application on environmental health grounds. Accordingly, I raise no objection, subject to the recommended mitigation measures being secured and implemented in full. Recommended conditions are in Annex B of this memo.

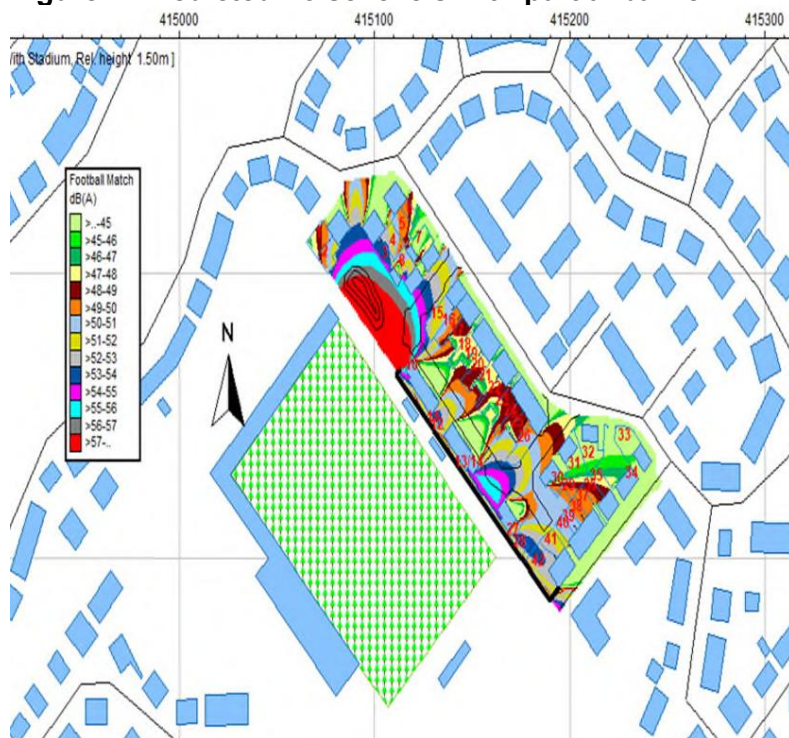
Annex A

Figure 1. Predicted noise levels with a continuous 3m high barrier.

Figure 7 Daytime Noise Contours during a typical football match



Figure 2. Predicted noise levels with partial barrier



Annex B

Recommended Conditions

Noise

1 No dwelling hereby approved shall be first occupied until a continuous 3m high acoustic barrier has been erected along the full boundary with the adjacent football ground in accordance with the approved Noise and Light Mitigation Plan.

The barrier shall:

- Be continuous with no gaps or openings;
- Be constructed from materials with a minimum superficial mass of 10 kg/m²; and
- Be installed in full prior to first occupation of any dwelling.

The acoustic barrier shall thereafter be retained and maintained for the lifetime of the development.

Reason:

To protect the amenity of future occupiers from noise associated with the adjacent sports use, in accordance with the NPPF and the Noise Policy Statement for England.

Ventilation

2 No development above slab level shall take place until details of a mechanical ventilation scheme for those rooms identified on the approved Noise and Light Mitigation Plan as requiring mechanical ventilation have been submitted to and approved in writing by the Local Planning Authority.

The scheme shall:

- Provide adequate ventilation with windows closed;
- Demonstrate the mechanical ventilation will comply with the Acoustics, ventilation and overheating residential Design Guide (Association of Noise Consultants, 2020)
- Include details of installation, operation, and maintenance.

The approved scheme shall be fully installed prior to first occupation of the relevant dwellings and thereafter retained and maintained in accordance with the approved details.

Reason:

To ensure suitable internal living conditions are achieved without reliance on open windows in a high-noise environment.

Lighting Mitigation

3. Prior to first occupation of the relevant dwellings, integral blackout blinds shall be installed in all habitable room windows identified (orange) on the approved Noise and Light Mitigation Plan.

The blinds shall:

- Be designed to minimise the ingress of artificial light from the adjacent sports facility; and
- Be retained and maintained for the lifetime of the development.

Reason:

To mitigate the impact of artificial lighting from the adjacent sports use and safeguard residential amenity.

Contaminated Land

4. No development shall commence until an assessment of the risks posed by any contamination (including gases and water quality) has been submitted to and approved in writing by the local planning authority. This assessment must be undertaken by a suitably qualified contaminated land practitioner, in accordance with British Standard BS 10175: Investigation of potentially contaminated sites - Code of Practice and the Environment Agency - Land Contamination Risk Management (LCRM) (or equivalent British Standard and Model Procedures if replaced), and shall assess any contamination on the site, whether or not it originates on the site.

The assessment shall include:

- a survey of the extent, scale and nature of contamination;
- the potential risks to: - human health; - property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes; - adjoining land; - ground waters and surface waters; - ecological systems; and - archaeological sites and ancient monuments.

5. No development shall commence where land affected by contamination is found which poses risks identified as unacceptable in the risk assessment, until a detailed remediation scheme has been submitted to and approved in writing by the local planning authority. The scheme shall include an appraisal of remediation options, identification of the preferred option(s), the proposed remediation objectives and remediation criteria, and a description and programme of the works to be undertaken including the verification plan. The remediation scheme shall be sufficiently detailed and thorough to ensure that upon completion the site will not qualify as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to its intended use. The approved remediation scheme shall be carried out and upon completion a verification report by a suitably qualified contaminated land practitioner shall be submitted to and approved in writing by the local planning authority before the development is occupied.

Construction Management

6. No development shall take place until a Construction Method Statement has been submitted to, and approved in writing by the local planning authority. The Statement shall provide for:

- A description of the construction programme;
- the parking of vehicles of site operatives and visitors;
- loading and unloading of plant and materials;
- storage of plant and materials used in constructing the development;
- the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;
- wheel washing facilities;
- measures to control the emission of noise/vibration, dust and dirt during construction;

- The location of generators
- a scheme for recycling/disposing of waste resulting from demolition and construction works;
- delivery, demolition and construction working hours.
- A named person and telephone number for residents and LPA to contact in the event that complaints are received.

The approved Construction Method Statement shall be adhered to throughout the construction period for the development.

There shall be no burning undertaken on site at any time.

Construction works shall take place only between 08:00 – 18:00 on Monday to Friday, 08:00 – 13:00 Saturdays and shall not take place at any time on Sundays or on Bank or Public Holidays.

Reason: Core policy 57, Ensuring high design and place shaping such that appropriate levels of amenity are achievable.

Informative

The applicant is advised that the development is located adjacent to an operational football ground. As a result, occupants of the approved dwellings are likely to experience noise and artificial lighting associated with matches, training, and other events.

All prospective purchasers and occupiers must be made aware, prior to the exchange of contracts or first occupation, of the proximity of the football ground and the potential for disturbance arising from its operation.

Where dwellings have been fitted with mitigation measures as part of the approved Noise and Light Mitigation Plan (including, mechanical ventilation systems, and/or blackout blinds), the following must be provided in writing to purchasers and occupiers:

- Confirmation of the presence and purpose of these mitigation measures; and
- Clear instructions on their correct operation and maintenance, to ensure that the intended levels of residential amenity are achieved.

Failure to utilise these measures as designed may reduce their effectiveness in mitigating noise and lighting impacts.