

Subject: Planning Application No. A/248/21/PL : Land North of Water Lane, Angmering - Variation of Condition 4 (A/40/18/OUT)

Dear David,

Environmental Health:

Noise. I refer to Phlorum Noise Assessment, Project No. 10574, Revision 002, 19 November 2021.

If granted, this variation would bring noise sensitive dwellings approximately 25m closer to a primary noise source, the A27. The developer appears to propose using these repositioned houses as a noise barrier to the rest of the site. It is of course, possible for the building fabric to be constructed to achieve acceptable internal noise levels. However, as clearly stated in the Planning ProPG (and this report) 'solely relying on the sound insulation of the building fabric to achieve acceptable acoustic conditions is not considered good acoustic design.' Although the provision of suitable acoustic insulation to windows and mechanical means of ventilation based on MEV3 or 4 was considered acceptable for the layout of the site set out in

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DISTRICT COUNCIL, ARUN DISTRICT

the outline planning application, moving noise sensitive dwellings substantially closer to the A27 is contraindicated

Kind regards

Carol

Carol Reynolds

Senior Environmental Health Officer
Environmental Health Department



Phlorum Response to Noise Comments raised by Carol Reynolds

1. The internal noise targets will be achieved with the proposed glazing and ventilation measures (this is not being disputed). However, the same method of noise mitigation would have been required for the previous outline plan that was 15m (and not the 25m mentioned in the Adur DC response, see point 5 below) further from the A27. The only difference is that the glazing spec will be slightly amended.
2. The noise level difference between the proposed residential properties at 69.3m from the A27 compared to 84.4m in the outline application is 0.9 dB when considering the noise from the A27 as a continuous line source. Although it is accepted that this provides a small imperceptible noise increase when compared to the outline application, this makes a marginal difference to the required glazing specification.
3. My understanding is that the layout amendments resulting in the scheme moving closer to the A27 for the latest application were in response to issues (other than noise) raised by Arun DC.
4. The ProPG Planning and Noise quote shown in the Adur DC response is not the full quote. This is shown in para 2.22 of the document and states that:

Solely relying on sound insulation of the building envelope to achieve acceptable acoustic conditions in new residential development, when other methods could reduce the need for this approach, is not regarded as good acoustic design.

The underlined part of this statement regarding '*when other methods could reduce the need for this approach*' is crucial to this statement.

2.22 Using fixed unopenable glazing for sound insulation purposes is generally unsatisfactory and should be avoided; occupants generally prefer the ability to have control over the internal environment using openable windows, even if the acoustic conditions would be considered unsatisfactory when open. Solely relying on sound insulation of the building envelope to achieve acceptable acoustic conditions in new residential development, when other methods could reduce the need for this approach, is not regarded as good acoustic design. Any reliance upon building envelope insulation with closed windows should be justified in supporting documents.

Extract from ProPG: Planning
and Noise, May 2017

Other methods have been considered such as road side barriers, which would require permission from Highways England and barriers in front of the nearest properties, which are not considered acceptable by all parties on the grounds of visual impact.

Clearly this leaves the distance from the A27 as a means of reducing the noise at the nearest properties. However, what is a reasonable distance in terms of sound attenuation? There is no guidance in ProPG that indicates that the distance used in the outline application (84m) was acceptable but that moving closer (69m) and thus increasing the noise by 0.9 dB is not acceptable.

5. We have checked the distances from the nearest residential properties on the outline plan and the amended 2021 plan and these are as follows:
 - a. Outline Plan 84.4m from nearside carriageway of A27 to nearest residential property
 - b. 2021 Plan 69.3m from nearside carriageway of A27 to nearest residential property

The nearest proposed residential property is 15m nearer to the A27 than in the outline application rather than the 25m indicated by Adur DC. Please note that the noise measurements were taken at 95m from the A27 and the measurement location was selected as a secure location for the noise equipment at approximately the location of the proposed residential properties for the outline application. The noise modelling for the outline application considered the distance of 84.4m from the nearside carriageway of A27.