

**SOUTHERN OFFICE**

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10 September 2026

Mr Stephen Jupp
Planning Solutions
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Our ref: PB/13174/JFM

Dear Stephen:

F/36/26/OUT Paynters Croft Burndell Road, Yapton, BN18 0HR – Response to Environmental Health Consultation Response

This Letter provides a response to the comments made by Environmental Health in the document "Environmental Health Consultation Response" dated 17-08-2026, for the above Planning Application.

The Environmental Health Consultation has expressed concern *"I have concerns that the submitted assessment does not fully reflect the current operational circumstances at the adjoining site, particularly as activity on the site has changed from inert waste processing to general waste processing, with the potential for different emissions, odours and amenity impacts arising from that change."*

This issue is addressed in Paragraphs 4.31 to 4.34 of our Noise Assessment (for Planning Application WSCC/006/25) and is based on the noise assessment that was submitted by TJ Waste as part of their Application. WSCC/006/25 was subsequently withdrawn and replaced by Application WSCC/018/25. The noise assessment that accompanied WSCC/018/25 was identical to that submitted for WSCC/006/25 and is therefore covered by Phlorum's noise assessment. The change from inert waste to mixed waste involves the use of quieter plant and the noise impact for mixed waste is therefore no higher than for inert waste.

Application WSCC/009/26 has also been submitted after the preparation of Phlorum's noise assessment and relates to the variation of operating hours to allow the site to receive (and tip) waste on Bank and Public Holidays (except for Christmas Day and New Year's Day). No processing of waste will take place on bank holidays, so the only activities permitted to take place are deliveries and tipping. A Technical Note was attached to the Planning Application, but it is noted that this was the identical Technical Note already submitted with Applications WSC/006/25 and WSCC/018/25 and did not address the additional hours. However, it is noted from Section 2 of the Technical Note that noise from the concrete crusher is the key source of sound associated with the proposed development. This source would not be present on a bank holiday. The background noise surveys undertaken by Phlorum did

not include a bank holiday (and it would be unusual to do so), but background noise levels on bank holidays are often similar to Sundays and it is noted that background noise levels (L_{A90} levels) on Sundays are only marginally lower than weekdays. Given that the most significant noise source (the crusher) would not be operating on Bank Holidays, no significant noise impacts would be anticipated on Bank Holidays.

It is therefore considered that current operational circumstances have been fully assessed.

The Environmental Health Consultation has expressed concern *"the noise survey work on which it relies was undertaken in 2024. Since that time, I understand that the adjoining industrial units have increased their hours of operation, this change may affect the noise climate to which future residents would be exposed."*

The main purpose of the background noise surveys was to establish background sound levels to be used in the application of BS 4142+A1:2019 (the Standard for industrial noise). Noise from the industrial processes has then been modelled based on a worst-case usage basis. The background sound level is unlikely to have changed significantly since 2024 and, if it has changed, it is more likely to have increased than decreased. Since noise impacts are determined by subtracting the background sound level from the Rating Level, this means that actual impact of industrial noise would be lower than that shown in our Noise Assessment.

The Environmental Health Consultation has also expressed concern *"I must also strongly object to the statement in section 7.13 that there remains headroom for an increase in industrial activity. The 6 dB figure referred to should not be treated as available headroom for future industrial expansion. That level is associated with the threshold at which significant adverse effects may arise, rather than a level at which adverse impact would be acceptable. Adverse effects are likely to occur from an increase of approximately 1.2 dB, not only at a 6 dB increase as implied.."*

Section 7.13 of the noise report seeks to address future expansion of the industrial uses adjacent to the site. Current Planning Guidance from NPSE can be summarised as follows:

- Significant adverse impacts should be avoided
- Adverse impacts: All reasonable steps should be taken to mitigate and minimise adverse impacts

BS 4142+A1:2019 assesses industrial noise by subtracting the background sound level from the Rating Level. It then provides the following guidance:

- A difference of around +10 dB or more is likely to be an indication of a significant adverse impact, depending on the context;
- A difference of around +5 dB is likely to be an indication of an adverse impact, depending on the context;



- Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context; and
- The lower the rating level is relative to the measured background sound level,

Combining the guidance of NPSE with BS 4142+A1:2019, it can be concluded that if the Rating Level is between +5dB and +10dB above the Background Sound Level, this is an indication of adverse impact. NPSE allows such impacts, provided that all reasonable steps have been taken to mitigate and minimise adverse impacts. If the Rating Level is +10dB or more above the Background Sound Level, this is an indication of significant adverse impact and NPSE states that this should be avoided.

The Environmental Health Consultation has also expressed concerns that *"Furthermore, as the assessed industrial noise level is already above the existing background noise level, any additional increase would contribute to background noise creep in the area. Environmental Health would therefore not support any increase in noise arising from the industrial activity. This position may limit the ability of the adjoining industrial units to expand or intensify their operations in the future where such activity would increase noise level at the proposed residential accommodation."*

We don't believe that this statement follows current Planning Guidance. As stated above, any future expansion of existing industrial uses, or new industrial uses, would be assessed using the guidance outlined in BS 4142+A1:2019 and would generally include a cumulative assessment of all industrial noise sources within an area. There is still headroom for additional industrial noise within the Planning Guidance.

Yours sincerely



David Nicholls
Acoustic Consultant