

From: Fiona Fitzgerald
Sent: 13 February 2019 10:15
To: Planning.Responses
Cc: Simon Davis
Subject: Y/49/18/PL

Dear Simon,

Environmental Health **object** to this application on noise grounds.

I refer to the Acoustic Report AS10285.180326.ADS by Clarke Saunders dated 31/5/18 and subsequent emails between the applicant, EH and ADC Planning.

1. The site and plot layout don't appear to have been considered in order to mitigate noise impact sufficiently. Amenity land (i.e. garden) is placed closest to the known noise source (extractor fan).
2. Assessment of noise from the industrial units has taken account of the existing set up rather than the worst case scenario for the existing business class use of all units. This could mean that any intensification of the site within existing planning permissions would have a detrimental impact on these dwellings once occupied. For Environmental Health to be satisfied, the acoustic consultants must consider the worst possible situation, as detailed above.
3. The acoustic report has not provided outside amenity noise levels in the gardens across the entire site to show compliance with the WHO standards, only an assumption that this will be the case. Instead they have assumed that a single point source of noise is present and based their assumptions on that. As far as I am aware, there may be multiple potential point sources (from the industrial units) and a line source of noise from the road. Further, the WHO guidelines of 50 – 55 dB LAeq are for steady continuous noises such as traffic, and the noise from the extractor unit clearly does not fit into this category.
4. From my visit with Daniel Saunders from Clarke Saunders on Friday 16th March 2018 I stood approximately where the garden of Plot 5 is proposed to be whilst the extraction unit from the industrial estate was on. It is my opinion that the noise from the extraction unit would constitute a Statutory Nuisance under the Environmental Protection Act 1990 and therefore the development, if approved, would curtail use of the industrial site in contradiction to the NPPF which seeks to avoid unreasonable burdens on existing businesses due to nearby changes to noise sensitive land use, specifically contrary to paragraphs 170e and 180 of the NPPF.
5. After reviewing the raw data it needs to be considered that this location has very high noise levels throughout the day, evening and into the early hours (2/3am) and no indication of the reasons for this has been provided. The proposals to mitigate this are to ensure that windows are sealed shut and alternative ventilation is installed. I believe this will not provide sustainable well built residential properties for future residents.
6. The noise levels in the raw data appear very high for this area, especially through the night, no explanation or justification for this was given in the report. My awareness of the noise environment for this site conflicts with the raw data given (for example LAeq of low 50's at 1 or 2am shown in the raw data).

Any future submission should include:

- a. Discussion of the noise sources and the specific and separate (or cumulative if appropriate) impacts that these would have on the dwellings.
- b. A noise contour map for the LAeq daytime and nighttime for both road noise and industrial noise using the worst case scenario.
- c. The full workings out and raw data for any BS4241 calculations to be provided.

Regards

Fiona Fitzgerald