

Douglas, Sarah

From: Wedgbury, Stuart
Sent: 07 May 2024 10:30
To: Martin, Clare
Cc: Scott, Neil
Subject: RE: [PN/24/97070] 10-12 BOTLEY ROAD, HEDGE END, SOUTHAMPTON, SO30 2HE - NOISE comments

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Hi Clare

Thank you for forwarding the consultant's comments and amended report. I will set out my observations on these points below. I have limited my review to the parts of the amended report directed to by the consultant's comments. I respond under these headings:

1. Changes in industrial activity

As advised, I think you should research the extant consents / established uses and presence / absence of any relevant controls before forming a view on this matter. I am highly sceptical that the consultant's generalised view that, 'any future potential change of use, or reverting back to prior uses would not be outside the realms of what already exists in terms of use, and of noise and as such, no future impact should need to be considered.' is justified. In my experience, lawful changes in occupation and activity within extant B1 and B8 consents can indeed significantly change the character, magnitude, frequency and extent of noise impacts.

2. Existing pattern of residential use as a contextual consideration under BS4142

I do not consider the presence or absence of residential uses in this location to be a relevant contextual consideration using BS4142:2019 methodology. The purpose of the method is to (Para 1.1 of the standard), 'assess the likely effects of sound on people who might be inside or outside a dwelling or premises used for residential purposes'. The presence of other residential uses near or far, that may be similar impacted or not impacted at all is irrelevant for this purpose.

However, the pattern of land use and historical conflicts that may arise in this location may well be a wider consideration for you. This is a planning matter rather than a strictly noise amenity question.

3. Methodology

This is still not reported adequately. I previously referenced the requirements of the standard. It is particularly problematic that these parts of the standard have not been reported (my emphasis):

'12 (I) Measured sound level(s):

- 1) residual sound level(s) and **method of determination**;
- 2) ambient sound level(s) and method of determination;
- 3) specific sound level(s) and **method of determination**;
- 4) **justification of methods**; and
- 5) **details of any corrections** applied.□

m) Background sound level(s) and measurement time interval(s) and in the case of measurements taken at an equivalent location, the reasons for presuming it to be equivalent.'

The main concerns here are how the specific sound level has been calculated, when (excepting the 1 hour survey now described as relating to fixed plant sound from the takeaway only) the assessment appears to consist of unattended measurements? What specific industrial/commercial activities and sounds are likely to occur?; Did they occur during the assessment period?; what types of sound were discernible?; what was their source?; how typical was this activity?; how variable was the industrial / commercial activity?; how was residual sound calculated?; how was the specific sound calculated? Also, in respect of the assessment of background sound levels a single daytime figure only is stated described to be '**based**' upon modal values. How exactly has this been determined and what does the distribution of background measurements across time look like? Also how has background sound been measured absent the interference from industrial / commercial noise sources?; to what extent does the background sound level vary throughout the week and daytime period (07:00 hours to 23:00 hours) and how might that relate to periods of foreseeable activity in the commercial units? Based upon this pattern, is there a case for assessments based upon different time periods for example?

4. Context

The consultant re-iterates their view I think, that contextually the sound climate in this location is already high by virtue of the traffic noise affecting this location. They also use BS8233 as the source of a specific criterion to apply.

So what specifically does BS4142 say about this type of contextual argument? I refer to the contextual discussion in para 11(1) of the standard. This para relates in general terms to various considerations of the whole sound climate and how this context may change the overall assessment of the impact of commercial / industrial sound (thus far in the assessment method considered as relating only to the relative difference in levels between the industrial / commercial sound in isolation – adjusted for character; and the background sound). The para sets out three conditions relating to circumstances where the residual sound is high; where the background sound levels are low; or where the residual sound is very high. Residual sound here referring to the whole sound climate absent any industrial / commercial sound. I am not sure that any of these circumstances apply here! However, if we take the consultant's comments it appears that the argument is that the residual sound is high. The standard advises in such cases (my emphasis):

*'For a given difference between the rating level and the background sound level, the magnitude of the overall impact might be **greater** for an acoustic environment where the residual sound level is high than for an acoustic environment where the residual sound level is low.'*

This would suggest that the rating level taken in isolation would **underestimate** rather than overestimate the impact of the industrial / commercial sound contrary to the case being put forward.

Finally with regard to the reference to the specific criterion of 50dBA; reference BS8233 para 7.7.3.2 of that standard. More typically, this criterion is used where the soundscape has no particular offending characteristics. In such cases it must apply to the whole sound environment. The consultant's report suggests in Table 4 that the measured sound level at position NMP1 was 56dBA $L_{Aeq,(18 \text{ hour})}$; this is a position that appears to be located in the proposed garden areas close to the rear façade of the existing building. This of course described as a *measured level* must therefore include all sound sources; industrial/commercial and road transport and anything else that occurred during the survey period. Thus the sound climate is in excess of the BS8233 50dBA criterion quoted, rather than lower than the standard as claimed on this evidence.

However, you are not entitled to consider the transport noise element in your considerations, so I don't consider this to be a very helpful criterion to apply. BS4142 on the other hand is specifically intended for assessing sound from industrial and commercial activity.

5. Mitigation

The report is now contradictory in respect of recommendation for mitigation (see Section 4.7 and 5 of the report). There is a suggestion that a 2.4 meter acoustic fence could be constructed around the garden areas to reduce the impact of noise in these areas. This suggests that a 1dBA reduction of industrial / commercial noise only would be achieved within the garden areas. The methodology used to produce this assessment of benefit is not set out in the amended report and so I cannot comment upon how this figure has been obtained.

Such a reduction if achieved; would be of marginal benefit only in the garden area. It would likely not be achieved at first floor level of the residential building providing no benefit to any accommodation at first floor level. The consultant goes on to make an aesthetic argument regarding such a mitigation measure, it is outside my remit to comment upon this. However, you may well want to consider both the efficacy of such mitigation and the aesthetics and other planning considerations of this proposal in the round.

Regards

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From: Martin, Clare <Clare.Martin@eastleigh.gov.uk>

Sent: Friday, May 3, 2024 10:16 AM

To: Wedgbury, Stuart <Stuart.Wedgbury@eastleigh.gov.uk>

Subject: FW: [PN/24/97070] 10-12 BOTLEY ROAD, HEDGE END, SOUTHAMPTON, SO30 2HE - NOISE comments

Importance: High

Hello Stuart

The acoustic consultant has come back with a response to your consultation. Please could you review this and add any additional comments you may have. I am intending to write the report this Thursday/ Friday, so please can I have any comments by then.

Many thanks

Clare

Clare Martin

Senior Planning Officer (Tuesday to Friday)

Planning & Environment - Planning/Development Management