

Huckfield, David

From: Scott, Neil
Sent: 18 March 2024 16:02
To: Huckfield, David
Subject: X/24/96772 UNIT 1, HEDGE END RETAIL PARK, CHARLES WATTS WAY - Removal of condition 17 (Delivery hours) of planning permission F/21/91821

David

Thank you for consulting us on the above application, we have reviewed the information supplied by the applicant including the report by Sharps Redmore entitled 'Environmental Noise Assessment' Project No. 2120326/R03, dated 7.12.2023.

The application proposes the removal of all restrictions to delivery times. The current permission was issued to the present occupier, Aldi, in September 2022 it was agreed that deliveries be restricted to: 0700 and 2200 Mondays to Saturdays or 0900 to 1700 on Sundays and Bank Holidays.

In the covering letter supporting the application among the reasons given for the required extension in hours include: operational flexibility; using staff in an efficient manner and to avoid rush hour traffic. Further, it is advised that there will be no increase in the number of deliveries, which are given as 1 or 2 Aldi HGV deliveries per day, with an unspecified number of smaller vehicles delivering locally sourced produce. It is further stated that all vehicles are controlled by Aldi logistics, except milk deliveries. Deliveries are identified as taking 45-60 minutes to occur and waste collections as 15 minutes.

Though not stated explicitly in the covering letter, or introduction to the Noise Report, at section 4.5 of the report it is highlighted that the noise impact calculations have been carried out on the basis that a 3m high acoustic barrier is erected along the southern boundary of the service yard.

The applicant goes on to say that the submitted Noise Report demonstrates; through prediction of likely noise impacts based on measurements at other Aldi stores, and on measurements carried out during a delivery to the store in question, that significant noise impacts on the neighbouring dwellings will not occur.

To mitigate delivery noise the applicant proposes a Quiet Delivery Scheme, which specifies measures to minimise noise from Aldi operated deliveries. This does not address waste collections.

Residential properties are located on Goodlands Vale with their rear facades facing roughly toward the service yard of the Aldi store. The existing delivery hours were agreed with the applicant so as to prevent noise disturbance from deliveries affecting the residents during night time hours, and provide some respite during Sundays.

Given that the applicant advises that no increase in the number of deliveries is required, we would comment that the current permitted hours are such that they encompass the hours before and after the rush hour by some margin.

In addition, this Service has been contacted by residents of Goodlands Vale in connection with excessive noise from deliveries, including allegations that they sometimes occur at times outside of the currently permitted hours.

To assess the severity of noise impacts from deliveries the Noise Report has considered maximum noise events, L_{Amax}, compared to a level of 60 dBA, outside as these are related to sleep disturbance. It also considers the average noise level, L_{Aeq}, for the delivery, averaged over 1 hour. Surveys of ambient noise conditions have been carried out with the most recent in 2023 considered robust by the report's author. Measurements were also carried out during a delivery to the store adjacent to the delivery vehicle and near one of the dwellings on Goodlands Vale.

Measurements of maximum delivery noise adjacent to the residential dwelling is reported as being around 50 dBA, and subjectively only occasionally perceptible. The noise climate is described as being dominated by road traffic noise on the M27 and Upper Northam Road at the time.

Reviewing the comments in the report we do not believe that the applicant has satisfactorily demonstrated that significant adverse impacts will be avoided, or that noise impacts have been minimised, our reasons as follows:

- For the assessment of noise impacts the background noise level obtained during the 2023 survey has been chosen as the reports author considers it robust. We would highlight that the 2021 and 2023 surveys show similar levels, except at night, when the 2021 survey shows lower levels. Given the similarity in daytime levels, we are concerned that adopting the 2023 night time levels will underestimate noise impact during sleeping hours, by comparing delivery noise impact against these higher background levels.
- The survey location used in 2021 and 2023 is located closer to Upper Northam Road than the dwellings, and as such subject to higher traffic noise levels from the road, and higher L_{Amax} events. The short duration of the noise surveys means it is not possible to determine if the chosen background noise levels are truly robust and representative of noise conditions as experienced at the residents' dwellings.
- The BS4142 noise assessment assumes only one rating penalty for the delivery noise. The impact is also considered in terms of how average noise levels compare with World Health Organisation, WHO, advice. We would point out that the WHO standards referred to are for steady noise sources and not the type of irregular and impulsive noise that characterises deliveries. In our view adjustments should be applied to address the very different noise character under consideration here.
- A Quiet Delivery Scheme, QDS, is proposed. This provides advice for Aldi drivers, however it would not apply to drivers from waste collection companies (the noise impact of which is not assessed), nor is it possible to see how it would apply to other non Aldi employees e.g. hauliers / drivers.
- The report references a 'real world' delivery being monitored and concluded to not be significant. We would highlight that the delivery noise levels were measured 5 metres from the lorry, and it is likely that the driver / operator would have been aware that they were being monitored. The measured noise levels are lower than those used previously to 'predict' noise impact, and which were reported at the time as being representative and based on real world measurements of several deliveries at other Aldi stores. In our view, we think it would be fair to conclude that the 'typical' levels used previously are more representative given they encompass a wider range of deliveries rather than a one off. Simultaneous measurements carried out in Goodlands Vale were in an open area and not at rear of the dwellings. The subjective remark that the delivery was not particularly audible needs to be taken in the context of the time, mid evening, when traffic noise levels from the M27 are still high.
- The acoustic environment at the location is noisy, being dominated by road traffic noise, and we would highlight the advice in Planning Practice Guidance Noise which states, '*...In cases where existing noise sensitive locations already experience high noise levels, a development that is expected to cause even a small increase in the overall noise level may result in a significant adverse effect occurring even though little to no change in behaviour would be likely to occur...*'.
- Similarly, where the reporter advises that a change of 3dB is 'imperceptible' we would highlight that Planning Practice Guidance Noise advises, '*The subjective nature of noise means that there is not a simple relationship between noise levels and the impact on those affected. ...Some types and level of noise will cause a greater adverse effect at night than if they occurred during the day – this is because people tend to be more sensitive to noise at night as they are trying to sleep...*'. In this case we would point out that it is proposed to extend deliveries into the sleeping hours, and that the nature of the noise generated by a delivery lorry unloading is notably different in character to that of distant road traffic noise.
- The report references a 3 metre high acoustic barrier and includes the attenuation from this in its calculations of noise impact. Whilst we are supportive of additional attenuation, we are uncertain if this can be included as it may require planning permission in its own right. We would also always advise that the

process by which the barrier was designed and selected be included in the report, so we can assess if it is the most practicable option. This is of course on the basis of all practical options having been considered in the round.

In conclusion, we do not support the application to extend delivery hours as we are concerned that the application has not shown robustly that significant adverse noise impacts at night will be avoided, and that adverse impacts will be otherwise minimised.

Regards

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