

From: Chris Abel
Sent: 30 June 2020 13:16
To: Niamh Bonner
Cc: Simon Richardson
Subject: Application No 20/00088/FUL

Good afternoon Niamh,

Following on from our conversation yesterday I have been in contact with the person who completed our Noise Assessment to get further clarification on the points raised by Mr Keith White. Please see below the responses written in blue.

Please could we also clarify that our Mill operates 24 hours a day and has done for well over 12 months. It is our Commercial operation which operates between 06:00 and 18:00 hours .

The background noise survey was carried out unattended over a number of days, the standard does not require continuous measurements to establish background noise levels. The standard does state *"Where possible measure the background sound level at the assessment locations"* . The monitoring location chosen was *"on a lamppost in the vicinity of the closest NSR."* , not at the assessment location as recommended by the standard. The standard does allow for different monitoring locations and states *"If this is not possible measure at an alternative location where the residual sound is comparable with the assessment location(s). A detailed justification for this should be reported."* .

BS4142 states that the assessment should be undertaken considering the 'Typical' background sound level of an area not simply the lowest.

In order to establish a typical background sound level long term measurements were undertaken at the site which presents a larger data set and allows for further detailed analysis in order to define an actual typical background sound level. The use of a short term noise monitoring methodology for the 1 hour assessment period day time and 15min assessment period in the night time would not allow us to accurately establish a 'Typical' background sound level. Hence the long term methodology.

The monitoring location selected is adjacent to the public highway and could be dominated by road traffic which has the potential for a significant overestimate of the background sound level in a residential garden. The NIA does not state why it was not possible to obtain sound measurements at the assessment location(s), there is no justification reported for the measurement location selected and the fact that an alternative location has been selected is not considered in the uncertainty section of the NIA.

Upon visiting the site it was deemed that the C3 residential dwellings located adjacent were the most sensitive receptors largely due to the fact the the NSR associated with the Queens Head is subject to commercial noise from the restaurants operation including kitchen plant, car park noise and noise from existing operations at the BATA site. Thus the noise levels here are likely slightly higher than at the measurement location. Further to this we did not have permission from the operators of the Queens Head to measures at this location.

With regards to the carriageway, having lived in Swinton the next village as well as Norton I do know the area very well and Amotherby Lane during the night time, and for large periods during the day time has minimal road traffic if any thus it can be concluded that the background sound level, which is defined as the underlying sound level of an any area not inclusive of transient sound such as car pas bys, the sound level exceeded 90% of the time, that the reported sound levels are representative of both NSRs. The actual location of the monitor can be seen below:



As can be seen the lamppost/telegraph pole is located approx 5m from the road side and is actually more or less within the garden of NSR 2 hence measurements were undertaken at the assessment location.

Regardless of the suitability of the monitoring location I note that table 11 presents the night time background level is as 51dB(L_{A90,1 hour}). The background level has been taken from measurements between 06:00 and 07:00 on the basis that the site does not start to operate until 06:00. As mentioned in the NIA the site can operate 24hours per day, if that were to happen I would be concerned that noise emissions could lead to a significant impact, particularly seeing as the background noise levels are shown to be much lower before 06:00. I would therefore recommend that the hours of operation are restricted to between 06:00hrs – 1800hrs. by a suitably worded planning condition. Alternatively if the hours of operation restriction are not acceptable I would request that the applicant is required to assess potential noise impacts for the whole night time period. Any subsequent monitoring should be assessed from the NSR not in the vicinity of, if this is

not possible then I would expect to see details of why this was not possible and how the alternative site was determined as representative.

As stated in Section 2.2 background the site currently operates 24hours a day but general activities occur between 06:00 - 18:00 hence why this period was chosen to establish a typical background sound level of a typical scenario at the site. BS4142 states that when assessing the likely impact it is prudent to consider the wider context of the assessment. Given the wider context i.e the site already operates 24 hours a day and already has bulk bin loading and the fact the proposed development does not present the introduction of a totally new sound source to the area but at worst a slight intensification of existing sound sources any impact from the site will in all likelihood be lower than stated in the assessment. Given this it may be unfair on the applicant to impose operational time restrictions which may have implications on the efficacy of the business which has been operating in the area for a long period without issue. Further to this should the extensive noise management plan outlined in the report be implemented all noise from the site can be minimised significantly.

If you need any further information please do not hesitate to contact me.

Kind regards,

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