

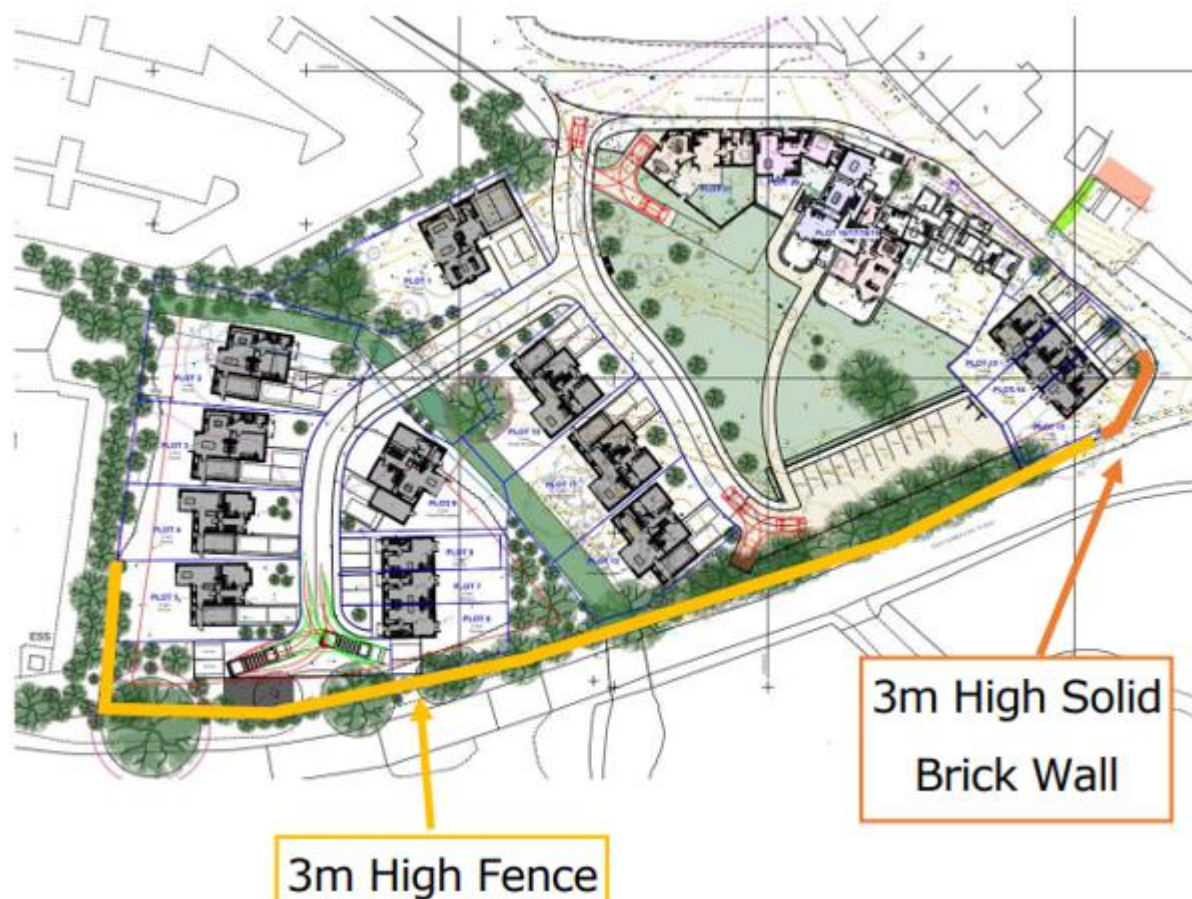
Environmental Control and Protection - Planning Consultation Response

To: Planning Officer

From: Vicky Brown
Senior Environmental Health Officer - Environmental Protection

Date: 21st February 2024

Planning Application Reference:	PL/2023/10495
Environmental Health Reference:	WK/202328891
Description of Proposal:	Conversion of Elmfield House and outbuildings to 6 x dwellings and the erection of 15 dwellings, hard and soft landscaping and associated works
Address:	Elmfield Cottage, Petersfinger Road, Petersfinger, Salisbury, Wiltshire, SP5 3BZ
Amenity Including noise, lighting, odour, smoke.	
I am writing regarding planning application PL/2023/10495 for Conversion of Elmfield House and outbuildings to 6 x dwellings and the erection of 15 dwellings, hard and soft landscaping and associated works. <u>Noise</u> I am aware there is existing planning permission for part of the site but I do not believe we have agreed to discharge of the condition relating to design and noise. A Noise Impact Assessment has been submitted which includes measurements of ambient sound levels taken between 14th and 19th September 2023. The site is adjacent to the busy A36 where there is frequent traffic congestion. As expected the measurements shown in table 1 section 4.7 of the report indicate the site is high risk from noise if a ProPg Stage 1 initial Risk Assessment was carried out. High Risk is identified in the guidance as: <i>'High noise levels indicate that there is an increased risk that development may be refused on noise grounds. This risk may be reduced by following a good acoustic design process that is demonstrated in a detailed ADS.'</i> The design includes a 3m high acoustic fence with a density of no less than 12kg/m2 and a 3m high brick wall along the boundary with the road and the layout has been designed so bedroom windows do not face the road. The fence and wall would be vital in terms of mitigating noise if this development was to go ahead so it is important it is acceptable in visual terms. The fence and wall are shown in the diagram below.	

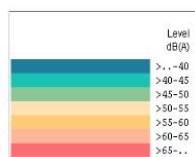


Unfortunately the density of housing results in dwellings being close to the road and residents of some of the properties would need to keep their windows closed all of the time (except for purge ventilation) so that suitable internal noise levels achieved. The diagram below, taken from the submitted report indicates the 9 dwellings where improved glazing and ventilation will be required and windows kept closed. If this application was to be approved these dwelling would need to be provided with mechanical ventilation, trickle vents as described in the noise impact assessment would not be sufficient.



- Zone V1** Sound attenuated trickle vents, Minimum $D_{ne,w}$, 36 dB, living rooms and bedrooms
- Zone V2** Sound attenuated trickle vents, Minimum $D_{ne,w}$, 36 dB, bedrooms only

I am not sure why Zone V1 is livingrooms and bedrooms and Zone V2 is bedrooms only as it appears all 9 properties are subject to noise levels above 50dB LAeq 16hours in the daytime. An open window would provide a maximum of 15dB attenuation so above 50dB externally would mean living room noise levels with windows open would be above 35dB LAeq16hours recommended in BS8233 and by the World Health Organisation



Project:
Petersfinger Road,
Salisbury

Title:
Daytime (07:00-23:00) Noise Contours, dB
 $L_{Aeq, 16 hr}$



Section 5.17 advises an overheating study will be required. I do not believe one has been provided. However even if a satisfactory overheating report and mitigation was provided we would recommend refusal. We have recently developed guidance on



planning and noise see this PDF Wiltshire Council Noise and Planning Team and I will past the most relevant section below.

Hierarchy Level 5

Building envelope

Reliance on the building envelope must be the last consideration once all other reasonable measures have been utilised. The noise exposure hierarchy table in the PPG Noise identifies having to close windows, where there is no alternative ventilation, to reduce noise levels as an adverse impact. The severity of the impact depends upon how often it is necessary to close the windows ...

Where reliance on closed windows for part of a dwelling is deemed appropriate it will be necessary to avoid overheating and to provide sufficient ventilation to provide comfort cooling. In such circumstances, trickle vents are not considered appropriate. The provision of an alternative form of natural ventilation will be required to aid thermal comfort. If this is impracticable then a Mechanical Ventilation Heat Recovery (MVHR) system with fully automated summer bypass may be acceptable. A separate overheating assessment for the development may also be necessary in such circumstances.

For noise from transportation sources, the ProPG (which provides guidance on new residential development) concurs with the PPG(Noise) when it comes to the need to close windows in order to achieve a satisfactory noise climate within habitable rooms. The ProPG includes the following statements with regard to opening windows and indoor noise levels:

‘Using fixed unopenable glazing for sound insulation purposes is generally unsatisfactory and should be avoided; occupants generally prefer the ability to have control over the internal environment using openable windows, even if the acoustic conditions would be considered unsatisfactory when open. Solely relying on sound insulation of the building envelope to achieve acceptable acoustic conditions in new residential development, when other methods could reduce the need for this approach, is not regarded as good acoustic design. Any reliance upon building envelope insulation with closed windows should be justified in supporting documents. (Paragraph 2.22)’.

and

‘It should be noted that the acoustic performance of the building envelope will be reduced in the event windows are opened for ventilation or cooling purposes, typically reducing the insulation to no more than 10 to 15 dB(A). Most residents value the ability to open windows at will, for a variety of reasons, and LPAs should therefore normally

request that designers principally aim, through the use of good acoustic design, to achieve the internal noise level guidelines in noise-sensitive rooms with windows open. Where internal noise levels are assessed with windows closed the justification for this should be included in the Acoustic Design Statement'. (Paragraph 2.33)'.

Our recommendation for this application is therefore of refusal because the design means that residents of 9 of the properties would need to keep windows closed most of the time to mitigate noise to an acceptable level. It is appreciated that the guideline values are not always achievable with windows open where development might be desirable and this may be the case for a city centre location. However this development is on the outskirts of Salisbury City within close proximity to a busy road and multiple commercial units. If, on the planning balance, despite our recommendation for refusal, a decision is made to approve this application we will recommend conditions.

Odour

An odour report has been submitted. This report has been considered during previous applications and we have no adverse comments to make regarding this.

Contaminated Land	
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Should planning be approved the following condition should be applied:

No development shall commence on site until an investigation of the history and current condition of the site to determine the likelihood of the existence of contamination arising from previous uses has been carried out and all of the following steps have been complied with to the satisfaction of the Local Planning Authority:

Step (i) A written report has been submitted to and approved by the Local Planning Authority which shall include details of the previous uses of the site for at least the last 100 years and a description of the current condition of the site with regard to any activities that may have caused contamination. The report shall confirm whether or not it is likely that contamination may be present on the site.

Step (ii) If the above report indicates that contamination may be present on or under the site, or if evidence of contamination is found, a more detailed site investigation and risk assessment should be carried out in accordance with DEFRA and Environment Agency's "Model Procedures for the Management of Land Contamination CLR11" and other authoritative guidance and a report detailing the site investigation and risk assessment shall be submitted to and approved in writing by the Local Planning Authority.

Step (iii) If the report submitted pursuant to step (i) or (ii) indicates that remedial works are required, full details have been submitted to the Local Planning Authority and approved in writing and thereafter implemented prior to the commencement of the development or in accordance with a timetable that has been agreed in writing by the Local Planning Authority as part of the approved remediation scheme. On completion of any required remedial works the applicant shall provide written confirmation to the Local Planning Authority that the works have been

completed in accordance with the agreed remediation strategy.

REASON: To ensure that land contamination can be dealt with adequately prior to the use of the site

Recommendation:

Refusal

Please contact the Environmental Control and Protection Officer should you wish to discuss these comments.