Arundel Farm
Allington
Salisbury
SP4 0BT

Julie Mitchell
Development Management
Bourne Hill
Salisbury
Wiltshire
SP1 3UZ

Copy by email to Developmentmanagement@wiltshire.gov.uk

4 August 2024

RE: Planning Application PL/2023/11131 – Objection

Dear Ms Mitchell,

Further to our original objection letter of 3 March 2024, we note that the applicant has adjusted their current application (further to their rejected application 20/07444/FUL). Having reviewed the revisions and Mr Kernon's letter of 30 July 2024, we wish to confirm that we continue to object to the application due to excessive noise.

We will not re-hash our original letter which we still believe to be valid regardless of the adjustments (so would request is still considered), but wish to re-iterate or clarify certain items in this letter.

1,000 metre rear-arc

We note that Mr Kernon claims in their letter of 30 July that "*the nearest sensitive receptor is now > 1,000 m away on the rearward direction and with a noise bund, so will be unaffected*".

Mr Kernon goes on to state that due to the 1km distance *"the CIEH guidance has been fully complied with."*

This is absolutely an incorrect and misleading statement. It concerns us that a specialist planning consultant would make such an erroneous and misleading statement, as such a basic error undermines the remainder of their report. For clarity the CIEH clearly state that:

"The size of noise buffer zone required will depend on local circumstances and on the level of shooting noise transmitted to noise sensitive areas. The advice given below is based on experience and is intended to offer practical guidance on the typical size of a noise buffer zone, rather than precise enforceable distances."

As such, the fact that the applicant has moved their shooting position by several metres, does not automatically invalidate all objections, or negate the need of the applicant and the planning office to consider the CIEH's guidance.

This is seen quite clearly in our next concern, where a distance of 2km is mentioned as a threshold in the CIEH guidance.

Further, we confirm that the ongoing shoots are affecting us.

Operating hours

Section 5.3 of the CIEH guidance states that (emphasis added):

"If the shoot is located where there are no noise sensitive premises within approximately 2 kilometres and/or complaints have not been received about a site and are not anticipated, then constraints on shooting times are unnecessary."

As you are aware, Arundel Farm is both within 2km of the shoot location **and** complaints about the noise from the shoot have been received from us. Therefore if planning were approved, restrictions on operation would be recommended by the CIEH – despite what Mr Kernon's letter incorrectly states. These restriction recommendations are as follows:

"Where justified complaints of noise have been received or are anticipated by the local authority, or where noise levels are measured or predicted to exceed the levels given in Section 6 of this guidance, then restricting shooting to the following times may provide a suitable remedy:

(i) Mondays to Fridays: 09.00 to 18.00 with a maximum cumulative duration of 4 hours
(ii) Saturdays: 10.00 to 18.00 with a maximum cumulative duration of 3 hours
(iii) Sundays: 10.00 to 14.00 with a maximum cumulative duration of 3 hours

On those sites where shooting occurs on more than 28 days within any calendar year it may, in some circumstances, be appropriate to further restrict the times of operation and/or the number of days per week and/or weeks per year that shooting may take place.

Restrictions may also need to be applied on Christmas day, Remembrance Sunday and Bank Holidays, or for other religious or special public days of significance to the community surrounding the shoot.

In order to protect noise sensitive areas it is recommended that any 'major event' should not be staged more frequently than once in any 28 day period. A 'major event' might be a regional, national or international competition, or any other event which might attract in excess of 50% more participants than would normally use the shoot. In such cases, notification to surrounding occupiers of land and to the local authority should be regarded as essential and additional measures to reduce the impact on noise sensitive premises should normally be taken."

Section 5.2 states

"In particular, residents should always be advised as soon as possible, and at least 28 days in advance, of any planned major event."

Therefore, whilst we object to the planning application, we would also object to planning consent being provided with the extensive opening hours requested, and the high frequency of major events. If planning permission is granted, we would request that more reasonable days/hours of use and major events is mandated via relevant conditions (including minimum spacing of 28 days). The applicant should also provide at least 28 days notice of any planned major event, not the 7 days notice mentioned in point 19 of the noise management plan.

Noise readings

In our letter of 3 March 2024 we raised our concerns regarding the applicability of the noise software and the assumptions used, so will not re-iterate these points. Similarly we raised concerns regarding the very limited noise survey and it's applicability. We would ask that these are still considered.

Sporadically, we have taken noise readings ourselves manually. Whilst we recognise our readings are from a domestic use decibel gun, and might be contested, we do believe that they indicate quite strongly that the theoretical software generated maximum noise levels are significantly understating the noise actually incurred, with readings consistently being in the mid to high 50s and with frequent readings in the 60s and some in the low 70s.

For the sake of transparency, we include videos of the various readings we have taken below, which are open to all to view and download at the following link. These have edited for brevity and file size, however the original files are available on request:

https://e.pcloud.link/publink/show?code=kZKlKgZcwWnqhJtXxBOdDdQzuDymFQqt9RV

Date	**Video name**	**Background level (dBA)**	**Shoot readings (dBA)**
Sat 03 Aug 2024	2024-08-03 (Saturday) 08 55 AM	42 - 44	51.4 - 58.0
Sat 27 Jul 2024	2024-07-27 (Tuesday) 11 17 AM	43 - 45	49.0 - 55.7
Sat 13 Jul 2024	2024-07-13 (Saturday) 11 21 AM	44 - 49	49.9 - 68.4
Wed 03 Jul 2024	2024-07-03 (Wednesday) 11 53 AM	43 - 46	52.1 - 57.5
Sat 22 Jun 2024	2024-06-22 (Saturday) 11 55 AM	46 - 47	54.9 - 57.9
Sat 22 Jun 2024	2024-06-22 (Saturday) 11 51 AM	44 - 47	52.6 - 69.9
Tue 07 May 2024	2024-05-07 (Tuesday) 09 08 AM	48 - 50	58.3 - 70.4
Sat 23 Mar 2024	2024-03-23 (Saturday) 10 34 AM	48 - 52	61.8 - 70.8

For this reason, we continue to believe that the proposed application would certainly create excessive noise and we continue to object to the application.

Yours sincerely

Paul Hook **Dr Alison Hook**