

Environmental Control and Protection - Planning Consultation Response

To:	Gen Collins Planning Officer
From:	Vicky Brown Senior Environmental Health Officer
Date:	23.07.2026
Planning Application Reference:	PL/2026/03375
Environmental Health Reference:	C-1592707
Description of Proposal:	Outline application for the demolition of number 5 and 6 Storridge Road and the erection of up to 165 dwellings (including affordable housing), with public open space, structural planting, landscaping, and sustainable drainage system (SuDS) and vehicular access point. All matters reserved except for means of access.
Address:	Land off Storridge Road, Westbury, BA13 4HX
Recommendation:	

Comments

This proposal has been the subject of extensive pre-application discussion under ENQ/2025/00563 and follows previous residential development proposals for the site, including PL/2022/09842 and the subsequent appeal (APP/Y3940/W/24/3340811), which was dismissed.

The site is located adjacent to West Wiltshire Trading Estate (WWTE), an important employment area where relatively unrestricted Class B2 industrial activities take place. The applicant must demonstrate that the development can achieve suitable residential amenity standards for future occupants and, in accordance with the agent of change principle, the

applicant must demonstrate that the proposed development will not result in unreasonable constraints on existing or future industrial activities within the estate.

This consultation response addresses noise, contaminated land, air quality and construction impact matters. Separate comments regarding odour were provided on 17 July 2026.

1. Noise

An acoustic report by Sharps Acoustics LLP (SAL) dated 21st April 2026 has been submitted. The revised scheme represents a significant departure from the previously dismissed proposal. The northern section of residential development closest to WWTE has been moved and there is also a "barrier block" intended to provide acoustic screening for those properties and to the remainder of the development. The site layout and dwelling orientations have also been designed to minimise exposure of habitable rooms to industrial noise by avoiding direct facing relationships with WWTE wherever possible.

The submitted assessment assumes the following mitigation measures:

- A 3-metre-high earth bund with a 3-metre-high acoustic barrier.
- 1.8-metre-high boundary treatments around private gardens designed to provide acoustic screening.

These measures are fundamental to the assessment and should be secured through approved plans and planning conditions as necessary.

It would be useful if the report contained an indicative layout showing how dwellings in the barrier block can be designed so that habitable room windows do not face the industrial estate.

1.1 Venom Nightclub

Noise from Venom Nightclub has been excluded from the assessment. The justification provided is that the Planning Inspector concluded that indoor entertainment events would not give rise to harmful effects and that outdoor events are restricted by the premises licence to three occasions per year.

Whilst I acknowledge the Inspector's findings, each planning application must be determined on its own merits. The current acoustic assessment does not provide evidence that noise from indoor events at Venom Nightclub would not adversely affect future residents.

I therefore recommend that the acoustic assessment be updated to include an assessment of noise associated with the nightclub and demonstrate that acceptable internal and external noise levels can be achieved at the proposed dwellings.

1.2 Agent of Change

The applicant's acoustic consultant has sought to address future intensification or expansion of industrial activities at WWTE by modelling a theoretical worst-case scenario. This has been derived by calculating the increase in industrial sound levels that would result in a BS4142 rating level of +5 dB above background sound levels at existing residential properties within Hawkeridge Park.

There is no specific methodology within national guidance describing how future industrial intensification should be modelled in circumstances such as these. The Planning Inspector noted within the appeal decision that:

"There are existing residents at Hawkeridge Park that also act as a constraint on excessive noise from the WWTE. However, the noise experienced by residents at Hawkeridge Park is not the same as that which would be experienced by some future residents on the appeal site, which would be much nearer the WWTE, and therefore potentially more affected, if not by absolute dB levels, then by tonality or other factors."

Given this observation, I request that the applicant explains how the methodology employed adequately addresses potential future increases in tonal, impulsive or other distinctive industrial sound characteristics, and not simply overall sound levels.

1.3 Noise Modelling

1.3.1 Section 4.6 states that Option 1 was developed to ensure that no habitable room windows would be exposed to sound levels above the adopted targets with windows open. The report should also confirm whether Options 2 and 3 achieve the same outcome.

1.3.2 Sections 4.4 and 4.5 acknowledge that measured sound levels during the August 2023 survey were lower than predicted because the SPC cooling towers and air handling units were not operating at the time of measurement. The assessment relies upon the higher predicted levels rather than the measured levels, which is considered an appropriately precautionary approach.

1.3.3 The report does not contain a prediction of overnight LAFmax levels within habitable rooms. For completeness, this information should be included.

1.3.4 The applicant should review the acoustic assessment submitted in support of application PL/2025/06989 (Welton Bibby & Baron factory extension) and confirm consistency between the industrial sound level assumptions used in both assessments. The applicant should also comment on any potential implications arising from alterations to the acoustic bund proposed as part of that development.

1.4 Peer Review Report Submission

Mott MacDonald has provided a peer review of the submitted SAL acoustic assessment on behalf of SPC Europe. I have been asked to have regard to this document in my comments. Some of the matters have already been addressed above.

The review discussed the methodology used to decide on the upper noise limits for facades with habitable rooms. The levels have been calculated by combining BS8233 levels with corrections from BS4142. There is no set design criteria for industrial noise and this is a method we have used to set target noise levels for other situations. We consider this method suitable in the circumstances and the levels were agreed by the inspector at appeal.

The agent of change/worst case scenario method is also queried. As mentioned above it would be useful if the applicant could explain whether they consider their method suitably addresses the tonality and other factors in this circumstance.

There is also discussion around the baseline sound environment. SAL carried out an environmental noise survey in August 2023 and then compared the results of this against

modelled predicted sound levels which were based on measurements carried out at, or close to, the businesses. They note in sections 4.4-4.5 of their report that measured noise levels in August 2023 were lower than predicted because cooling towers and AHUs were switched off at SPC. It is the predicted levels that have been used in the modelling, not the measured levels.

The Mott MacDonald report highlights that there is no locational information in the consultant's report to show where the noise sources were placed. I agree this would be useful information and would anticipate that this should be something that can be extracted from the noise modelling software that has been used.

Regarding the potential for intensification of use or expansion, as discussed above, this is difficult to predict and model, particularly for such a large industrial estate with many different businesses. Previous methods have included interviews with existing businesses about future plans, although that method is also open to criticism. The method used in this report, calculating the point at which an adverse impact would occur at existing properties and applying that to the proposed development, seems logical. Given that the proposed dwellings are now pulled back away from the industrial estate, the layout and orientation mean that the nearest dwellings will not have habitable rooms facing the industrial estate, and gardens are provided with a reasonable amount of protection, I consider this suitable. As mentioned above, however, I would like confirmation from the applicant as to whether the method they have used addresses tonality and other factors.

1.5 Public Open Space

The Urban Design Officer has queried anticipated noise levels within public open spaces. This is not an issue on which Environmental Control would normally provide detailed comment and I am not aware of any specific UK acoustic design standard for public open spaces comparable to the standards applied to residential gardens.

However, the submitted noise modelling indicates that all public open spaces would experience sound levels significantly below the 50 dB LAeq,16hr "desirable" outdoor living area guideline referred to within both BS8233 and World Health Organisation guidance. More stringent criteria have been applied to the private residential gardens because the

noise is from an industrial noise source. On that basis I have no concerns regarding the proposed public open spaces from a noise perspective.

2. Contaminated Land

A Phase 1 Geoenvironmental Desk Study has been submitted. This is the same report as we as submitted for the previous application. Requirements for detailed site investigation, remediation works and verification reporting can be secured through appropriately worded planning conditions. A comment has been submitted by someone concerned about the use of the location as a formal US military site during World War 2. I have been unable to identify evidence of this use from historical mapping or from contaminated land datasets available to the Council and Environment Agency. Nevertheless, should evidence of military use emerge, it should be considered within the Phase 2 intrusive investigation.

The following conditions would be recommended:

1. No development shall commence until an assessment of the risks posed by any contamination, including gases and water quality, has been submitted to and approved in writing by the local planning authority. This assessment must be undertaken by a suitably qualified contaminated land practitioner, in accordance with British Standard BS 10175: Investigation of potentially contaminated sites - Code of Practice and the Environment Agency Land Contamination Risk Management (LCRM), or equivalent replacement guidance. The assessment shall assess any contamination on the site, whether or not it originates on the site.

- a survey of the extent, scale and nature of contamination;
- the potential risks to human health;
- the potential risks to property, including existing or proposed buildings, crops, livestock, pets, woodland, service lines and pipes;
- the potential risks to adjoining land;
- the potential risks to ground waters and surface waters;
- the potential risks to ecological systems; and
- the potential risks to archaeological sites and ancient monuments.

2. No development shall commence where land affected by contamination is found which poses risks identified as unacceptable in the risk assessment, until a detailed remediation

scheme has been submitted to and approved in writing by the local planning authority. The scheme shall include an appraisal of remediation options, identification of the preferred option(s), the proposed remediation objectives and remediation criteria, and a description and programme of the works to be undertaken, including the verification plan. The remediation scheme shall be sufficiently detailed and thorough to ensure that upon completion the site will not qualify as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to its intended use. The approved remediation scheme shall be carried out and, upon completion, a verification report by a suitably qualified contaminated land practitioner shall be submitted to and approved in writing by the local planning authority before the development is occupied.

3. Air Quality

The submitted Air Quality Assessment is generally consistent with the methodology and requirements of Wiltshire Council's Air Quality Supplementary Planning Document (July 2026). The assessment classifies the development as a Type 2 development and includes an assessment of operational road traffic emissions and construction phase impacts. Subject to the submission and implementation of a Construction Environmental Management Plan, Low Emission Travel Plan and EV charging provision in accordance with the SPD, no objection is raised on air quality grounds. The applicant should however clarify within the assessment why the development does not meet any Type 3 classification criteria under Appendix F of the SPD.

4. Construction Impacts

We would expect the following condition to be applied.

3. No development shall take place until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The Statement shall provide for:

- a description of the construction/demolition programme;
- the parking of vehicles of site operatives and visitors;
- loading and unloading of plant and materials;
- storage of plant and materials used in constructing the development;
- the erection and maintenance of security hoarding, including decorative displays and facilities for public viewing where appropriate;
- wheel washing facilities;
- measures to control the emission of noise, vibration, dust and dirt during construction;

- the location of generators;
- a scheme for recycling/disposing of waste resulting from demolition and construction works;
- delivery, demolition and construction working hours; and
- a named person and telephone number for residents and the local planning authority to contact in the event that complaints are received.

The approved Construction Method Statement shall be adhered to throughout the construction period for the development.

There shall be no burning undertaken on site at any time.

Construction works shall take place only between 08:00 and 18:00 Monday to Friday, and between 08:00 and 13:00 on Saturdays. Construction works shall not take place at any time on Sundays or on Bank or Public Holidays.

5. Matters Requiring Applicant Response

1. The acoustic report should include an indicative layout showing how dwellings in the barrier block can be designed so that habitable room windows do not face the industrial estate.
2. The acoustic assessment should be updated to include an assessment of noise associated with Venom Nightclub and demonstrate that acceptable internal and external noise levels can be achieved at the proposed dwellings.
3. The applicant should explain how the agent of change methodology adequately addresses potential future increases in tonal, impulsive or other distinctive industrial sound characteristics, and not simply overall sound levels.
4. The acoustic report should confirm whether Options 2 and 3 achieve the same outcome as Option 1, namely that no habitable room windows would be exposed to sound levels above the adopted targets with windows open.
5. The acoustic report should provide a prediction of overnight LAFmax levels within habitable rooms.

6. The applicant should review the acoustic assessment submitted in support of application PL/2025/06989 and confirm consistency between the industrial sound level assumptions used in both assessments.
7. The applicant should comment on any potential implications arising from alterations to the acoustic bund proposed as part of application PL/2025/06989.
8. The applicant should provide locational information showing where the industrial noise sources were placed within the noise model.
9. The applicant should clarify within the Air Quality Assessment why the development does not meet any Type 3 classification criteria under Appendix F of Wiltshire Council's Air Quality Supplementary Planning Document.