

Mr Denis Colgan
Pollution Officer
Environmental Health
Staffordshire Moorlands District Council/ High Peak Borough Council

Our Ref: AD/Environment/MCA2212
Contact: Alicia Druce, Consultant - Acoustics
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Date: 26 July 2022

Dear Denis Colgan,

BWB has been instructed by Anesco Limited to respond to comments received by your department (Environmental Health) at Staffordshire Moorlands District Council following submission of the planning application (SMD/2022/0076) at Land off Bemersley Road, Brown Edge. This response relates specifically to the comments made on the Consultation Response document for the planning application.

Regarding the BS4142 assessment not including a feature correction, this is considered to be in line with the guidance as the nearest existing sensitive receptor is located at a significant distance from the site (approximately 235m south-east), therefore it is considered that any characteristics associated with noise from the development would unlikely to be perceptible at the receptors.

Whilst the outcome of the initial assessment demonstrates a significant adverse impact at the NSRs, various contextual arguments have been made in line with other relevant standards and guidance, as directed by BS4142. The report considers the existing measured ambient levels in line with the contextual argument detailed in **Section 11, paragraph 1** of BS4142. The report demonstrates that the existing ambient levels are above the predicted rating levels and therefore the proposed operations are considered to be of "low impact" for all NSRs during the daytime, and for NSRs 1 and 2 during night-time periods. For NSRs 3 and 4 during the night-time periods, a further contextual argument has been presented in the report in line with the below.

Whilst the contextual argument within the report references the previous version of BS4142, where it describes background levels below 30dB as "very low", we wish to highlight that within BS4142:2014 + A1:2019, **Table A.6 clause 11** the following is stated:

"The context is a new item of plant at a commercial premises with other plant elsewhere in a residual acoustic environment that, whilst relatively steady, includes regular events of a significantly higher level than that from the plant. At these times the noise-sensitive location is indoors with open windows where residual sound within the dwelling will further mask sound from the plant. Logarithmically subtracting residual level of 28 dBA from ambient of 36 dBA indicates source produces 35 dBA. BS 8233 indicates that 35 dBA sound level from the plant,

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equating to an internal level of around 25dBA or lower, with no significant acoustically distinguishing characteristics is suitable for a bedroom”.

The above states that a predicted level of 35dBA has no significant acoustically distinguishing characteristics for bedrooms which would suggest that achieving a rating level of 35dB at the receptors is in line with both BS4142 and BS8233 and that the contextual argument presented within the report is robust. It is therefore considered prudent to assess the internal levels in line with criteria detailed within BS8233.

We have also undertaken further indicative works and determined that the installation of a 1.5m high acoustic fence around the sources on the site would achieve a rating level of 35dBA at the receptors, thus satisfying the statement outlined in Table A.6 reproduced above, by reducing the rating levels as low as practicable.

In conclusion, the arguments presented within the report are considered to be in line with relevant guidance and standards and that the resultant impact of noise associated with the proposed development is low.

If I can be of any further assistance please let me know.

Yours Sincerely



Alicia Druce
Acoustic Consultant