



APPLICATION REF. 201853

RESPONSE TO ENVIROMENTAL HEALTH – NOISE

1 Introduction

- 1.1 This Note has been prepared by Quod in response the second set of comments, dated 21st April 2021, by Reading Borough Council's (RBC) Environmental Health Officer (EHO) in relation to pending application (ref. 201853) at Brunel Retail Park, Rose Kiln Lane, Reading. It is supported by a Noise Response document, dated 19th May 2021, prepared by Tetra Tech, following a previous response prepared by Tetra Tech (3rd February 2021) which provided additional clarifications regarding the design process and noise assessment..

2 Summary of Tetra Tech Noise Response

- 2.1 To summarise, both Tetra Tech's Noise Assessment (ref. B023908) - which was submitted as part of the pending application - and their 19th May 2021 dated Noise Response - confirms that the assessment of noise intrusion and the overall change in noise levels at nearby dwellings demonstrates that noise levels within nearby dwellings during the daytime and night-time are expected to be within the target noise intrusion criteria that relate to internal resting conditions and sleep disturbance. Consequently, there is expected to be a negligible change to existing ambient noise levels.
- 2.2 Of particular note in Environmental Health's response is the reference to the potential noise impact from the proposed development on any future residential development to the east of the development site (i.e. Land North of Manor Farm allocation). It is understood that a planning application has not yet been submitted to RBC for the redevelopment of the site and it should be noted that there is also the possibility that the site may not come forward for residential development at all or may not come forward for some time.
- 2.3 Given the above, we consider that when assessing the noise impacts of the proposed development at Brunel Retail Park, little weight can be given to the potential impact on the adjacent site, which may or may not be delivered in the future. Furthermore, it should be noted that any proposed development at Land North of Manor Farm Road will be expected to provide a "strong buffer", consistent with Policy SR2 of the Local Plan, and will be required to take into account surrounding commercial noise sources in line with the PPG (Reference ID: 30-008-20190722). As such, it is considered that it is unrealistic to analyse the site's effect on a development site that has yet to come forward.
- 2.4 Notwithstanding, noise mitigation measures have still been proposed as part of application ref. 201853, including the provision of a 4-metre-high acoustic barrier, the provision of a Service Yard Management Plan and an Operational Noise Management Plan. As outlined in the enclosed response prepared by Tetra Tech, it is considered that the development proposals have demonstrated how the extensive mitigation measures can be implemented so that operational noise levels can be reduced, in line with the requirements of the NPPF.

3 Planning Assessment

- 3.1 The Planning Practice Guidance (PPG) (Reference ID: 30-002-2019-0722) states that it is important to look at noise context of the wider characteristics of the development proposal, its likely users, and its surroundings.



Note continued

- 3.2 In terms of relevant local planning policies, Policy CC8 ('Safeguarding Amenity') of the RBC Local Plan (2019) states that development should not cause a detrimental impact on the living environment of existing residential properties or unacceptable living conditions for new residential properties, in terms of noise and disturbance. Given that it has been demonstrated through Tetra Tech's Noise Assessment (ref. B023908) that the proposed development results in a negligible change to existing ambient noise levels along with significant mitigation measures (i.e. the provision of a 4-metre-high acoustic barrier, the provision of a Service Yard Management Plan and an Operational Noise Management Plan), it is considered that the proposed development complies with Policy CC8.
- 3.3 Furthermore, Policy EN17 ('Noise Generating Equipment') states that where noise generating equipment is proposed, the noise source specific level (plant noise level) should be at least 10dBA below the existing background level as measured at the nearest noise sensitive receptor. Tetra Tech's Noise Assessment (ref. B023908) confirms that maximum noise levels from the proposed building services plant have been set and are predicted to be at least 10dB below existing night-time background noise. It is therefore considered that the proposed development complies with Policy EN17.
- 3.4 More specific to the Application Site is Policy SR2 which allocates the 'Land North of Manor Farm Road Major Opportunity Area'. As summarised in our Planning Statement, dated December 2020, redevelopment of the Manor Farm Road site will primarily be for housing (between 680-1,020 dwellings), an extension to the Whitley District Centre, school provision and open space and public realm improvements, but will also include small employment units to replace the Micro Centre, community uses, in addition to a limited amount of employment uses. The Policy states a number of requirements that the development of the site is required to meet. These requirements are in turn supported by Figure 6.3¹ (shown overleaf) which include the need for a "strong buffer to existing commercial uses" (i.e. the Application Site). Future development of this land will therefore need to have regard to this, consistent with Paragraph 5.4.35 of the Local Plan (2019) which states that in some cases, residential development is proposed in areas where noise levels may be an issue and it should be possible to mitigate this through the design of the scheme. In line with this, the Land North of Manor Farm Road Major Opportunity Area Strategy illustrates a requirement of a "need for strong buffer to existing commercial uses" at the north of the site.

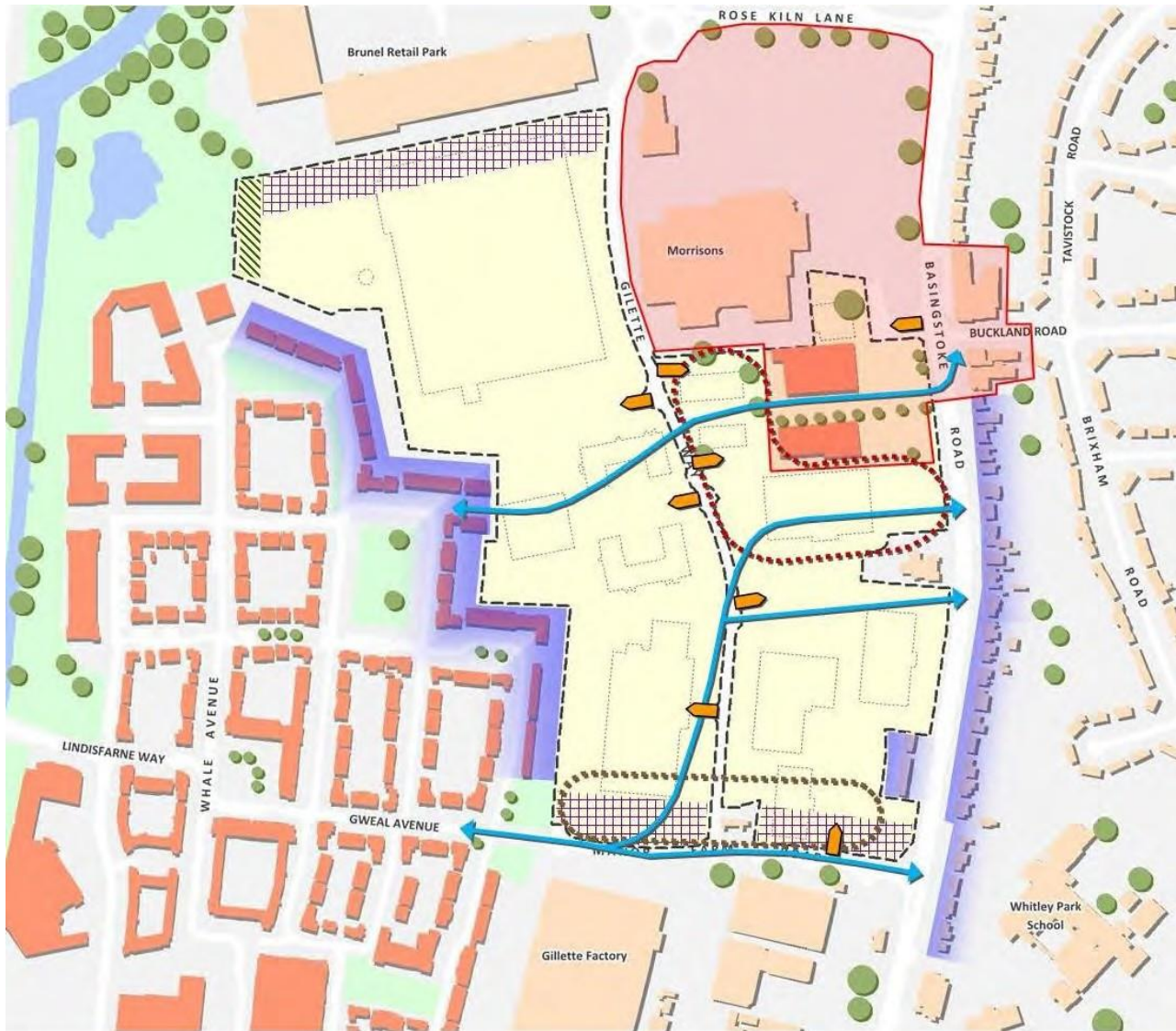
4 Conclusion

- 4.1 We disagree with the concerns raised by the EHO; limited weight should be given to those concerns with reference to future occupiers where no development or indeed no planning application has come forward, and Local Plan policies are in place that will govern the assessment of those future applications, having regard to the existing commercial uses. We trust that Officers will balance these considerations when considering the overall merits of the scheme, to enable the application to be taken forward with a positive recommendation.

¹ Land North of Manor Farm Road Major Opportunity Area Strategy



Note continued



Key

	Sub-area boundary		Nearby sensitive location—low-rise residential		Potential for town centre uses as expansion of district centre
	Major Opportunity Area		Vehicle access point		Potential for commercial uses as transition to employment area
	Footprint of existing building in Major Opportunity Area		Key movement corridor (pedestrian and/or cycle)		Landscaped buffer to nature reserve
	Existing building		District centre		Need for strong buffer to existing commercial uses
	Recent building or building under construction				

Figure 6.3: Land North of Manor Farm Road Major Opportunity Area Strategy

784-B023908

19th May 2021

Response to comments received from Senior Environmental Health Officer (Rebecca Moon) at Reading Borough Council (RBC) dated 21st April 2021 regarding the submitted Noise Assessment by Tetra Tech (formerly WYG) [ref B023908 dated 25th November 2020] for planning application reference 201853.

Tetra Tech Responses in Blue

This response document has been prepared following a previous response prepared by Tetra Tech (dated 03rd February 2021) which provided additional clarifications regarding the design process and noise assessment.

RBC Comment 1

I have reviewed the response from the acoustic consultants, which confirms that some mitigation has already been taken into account in the assessment.

I remain concerned about the impact of noise on nearby residents, and due to the fact that there are likely to be additional residents closer to the site, and would request that further mitigation is considered with the aim of achieving predicted noise levels that are not above background levels.

(current prediction is 6 and 7 dB above background during the day, and 5 dB above background at night time).

Tetra Tech Response 1

It should be noted that the submitted noise assessment identifies that although operational noise levels have the potential to exceed background noise levels during the daytime (assuming an unmitigated scenario), Section 6 of the report identifies that with the inclusion of extensive noise mitigation measures that have been proposed, operational noise levels are expected to be below background noise levels at external locations during the daytime.

Furthermore, it should also be noted that BS 4142 recognises that the significance of sound of a commercial nature depends upon both the margin by which the rating level of the specific sound source exceeds the background sound level and the context in which the sound occurs and the standard does not prescribe specific target noise levels.

When considering the guidance presented within BS 4142 in relation to the development site, the context-based assessment methodology that has been established considers the likely effects of sound on people who might be inside or outside a dwelling at different times of the day. The assessment of noise intrusion and the overall change in noise levels at nearby dwellings (which are understood to include noise mitigation measures, although these are not taken into account in calculations) demonstrates that noise levels within nearby dwellings during the daytime and night-time are expected to be within the target noise intrusion criteria that relate to internal resting conditions and sleep disturbance and that there is expected to be a negligible change to existing ambient noise levels.

With respect to the potential for future residential development to the east of the development site, it is understood that no details of any proposals have been submitted to the council. However, any subsequent

application is expected to incorporate a buffer zone and would be required to take account commercial noise sources associated with the existing development site as a matter of course and so the proposed development is not expected to create additional constraints in relation to noise. Indeed, Section 6.4 of the submitted noise assessment identifies how the currently proposed mitigation measures associated with the development site could be enhanced further to reduce the potential impact of noise from vehicles moving and loading/unloading.

Nevertheless, in order to provide additional comfort that noise levels can be controlled, the use of an Operational Noise Management Plan (ONMP) could be implemented at the site, tailored to specific occupiers for which an example is appended to this response. The objective is to ensure that the external operations operate efficiently and effectively; thereby minimising any incidence of potential disruption on the highway and noise disturbance to local residents. It is considered that an effective ONMP could help improve the overall operation of the delivery strategy at the site, removing issues relating to vehicles causing noise disturbance to local residents. Studies at other sites have shown that operational noise levels can be typically reduced by 5 – 7 dB.

Therefore, it is considered that the development proposals have demonstrated how extensive mitigation measures can be implemented so that operational noise levels can be reduced to avoid the potential for any significant adverse impacts in relation to noise, in line with the requirements of the NPPF.

End of Document

Graham Davis
Principal Environmental Consultant

Nigel Mann
Director

Mayfair Capital Investment Management Limited

Brunel Retail Park, Reading

Draft Service Yard Management Plan

May 2021

3 Sovereign Square, Sovereign Street, Leeds LS1 4ER

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Document Checking:

Prepared by:	Emma Aspinall AMIOA <i>Senior Environmental Consultant</i>	Initialled:	EA
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Reviewed by:	Graham Davis AMIOA <i>Principal Environmental Consultant</i>	Initialled:	GD
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Template Approved by:	Nigel Mann MIOA <i>Director</i>	Initialled:	NM
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Issue	Date	Status
1	12 th May 2021	Draft for Comment
2		
3		
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1.0 Introduction

This report presents a Service Yard Management Plan for the proposed development at Brunel Retail Park, Reading.

2.0 Service Yard Management Plan

Objective

The objective will be to ensure that noise is kept to a minimum and that vehicles operate efficiently and effectively when serving the depot; thereby minimising any incidence of potential disruption from potential noise disturbance to local residents. This document has been produced in accordance with the DfT Quiet Deliveries Good Practice Guidance – Key Principles and Processes for Retailers: April 2014. Relevant signage will be installed, reminding drivers and of the Noise Management Plan (NMP) principles and regular training will be provided by management to enforce the points. An activity log of ongoing checks and training will be kept and available to the Local Planning Authority (LPA) on request.

Timescales and Review

This noise management plan will be reviewed bi-annually as part of public and local authority liaison. Where required, additional mitigation, monitoring or best practice will be included in subsequent revisions. Similarly, in the absence of complaints or interest the regularity of review of this management plan may be reduced or mitigation controls relaxed.

Implementation of the physical measures will be undertaken prior to occupation. It is expected that the management controls below will be implemented in full within 1 month of occupation.

Physical Noise Mitigation Measures

No Tannoy systems will be used in the site.

Waste and recycling areas will be provided with acoustic screening as part of detailed design proposals for the unit to eliminate direct lines of sight to nearby dwellings and use of equipment machinery or vehicles associated with the waste recycling areas will be subject to a working hours restriction of 7am to 11pm.

This NMP includes the requirement for the following noise mitigation measures to be installed/kept:

- Surfacing of the service yard to be smooth with no cracks and mixed height joints.
- Signage to remind drivers of being quiet at night

Vehicle Management Strategies

A combination of strategies will contribute to the operation of the NMP. These include overriding management controls.

- Vehicle Manoeuvres
- Vehicle Schedules

Delivery and Loading Process

There are a number of management and operations measures to reduce noise levels which include: -

Unloading

- Ensure engines are switched off;
- Manoeuvring should be minimised;
- Goods will be loaded/offloaded from the vehicle directly from/into the internal loading bay;
- There should be no radios left on;
- Doors should be closed without excessive force;
- There should be no shouting in the external yard area;
- There should be no use of vehicle horns in the area except in event of emergency; and
- Drivers should seek to:
 - lower loading plates into the correct position with minimal noise;
 - avoid making contact with trailer walls, lift guardrails and other obstructions; and
 - maintain conversation to a minimum.

The Return Journey

- All vehicle doors must be closed with minimal noise; and
- Drivers should seek to:
 - engage gears with minimal noise;
 - avoid the use of horns other than as required by the Highway Code in the event of emergency situations;
 - keep engine revs to a minimum;
 - apply brakes gently; and
 - accelerate gently until the vehicle is a reasonable distance from the distribution centre.

Reversing Alarms

The occupier will endeavour to use broadband (white noise) reversing alarms however, it is not possible to ensure that every vehicle visiting the site will be fitted with broadband reversing alarms. For example, the majority of vehicles owned by the occupier have broadband (white noise) reversing alarms however, 3rd party vehicles (including maintenance vehicles) may not be able to be controlled in this way and therefore this would not be able to be enforced.

Ongoing Management and Maintenance

Management staff will undertake monthly checks, both within and surrounding the yard areas to ensure that all equipment, gates etc. are operating efficiently and without excessive noise. This includes a check on the external yard surfacing. Similarly, management staff will check that the NMP is being adhered to and keep a log of this activity. A direct, out of hours telephone line, with contact details, will be made available to nearby residents and local authority Environmental Health Officers to aid liaison.

Signage will be provided at the entrance to site reminding drivers to be respectful of local residents and to keep noise to a minimum and also providing the 24hrs hotline number for residents to call to resolve any concerns.

Any defects or damage (such as squeaking gates, cracks to yard surface, gaps/splits in dock cushions, clips to stone pillars) will be reported to the centre Manager and remedied in a reasonable time.

Training and Ongoing Management

Regular training will be undertaken by management to drivers and local staff to ensure that this Management Plan and the DfT Quiet Deliveries Good Practice Guidance will be adhered to. This training will be logged and made available to the LPA upon request.

- Management staff will undertake a minimum of monthly checks, to ensure that this Management Plan is being adhered to.
- Regional management will undertake unannounced checks (in conjunction with their existing schedule of unannounced checks) to ensure that this Management Plan is being adhered to.

End of Document

Appendix A – Example Noise Monitoring Logbook

Week Commencing; _____

Location	Date	Equipment details (Make, Model, Serial Number)	Calibration Details	Instrument Settings (e.g time weighting, frequency weighting)	Instrument Set-up (e.g Height / Free field?)	Weather Conditions	Time Start	Time End	Duration	Measured Noise Level L_{Aeq,T}	Description of Works	Comments	Supervisor Signature