

Dear Hannah,

Having reviewed the above planning application Environmental Health has no objection to the principle of the proposal but have the following observations.

### **Noise Assessment**

The application is accompanied by a Noise Assessment undertaken by LFAcoustics (Dated March 2023). I note that with the proposed noise mitigation measures implemented the noise modelling presented concludes a worse case +3dB above the prevailing background sound level at Elbridge Farm Cottages, the report concludes that with the proposed mitigation in place there is a '*low potential for adverse impact*' when assessed in accordance with BS4142:2014+A1 2019. I would treat this conclusion with caution, for the following reasons;

*Background sound level* – The assessment is based on a very limited background sound level dataset, obtained mid-morning on one day, and therefore in my view background sound levels presented in the report are not considered 'typical' for the operational hours of the site i.e. background sound levels may differ on a Saturday morning than a mid-morning during the week and potentially during earlier and later periods of the daytime.

*Noise modelling* – The report presents and relies upon the output of noise modelling to determine noise levels at the receptor locations. No input data is provided on source sound power levels, source heights, receiver heights, ground absorption applied, assumptions regarding meteorology etc.

*Assessment outcome* – As noted above the resultant worse case assessment is stated as +3dB above the stated background sound levels with a '*low potential for adverse impact*' when assessed in accordance with BS4142:2014+A1, however this conclusion does not align with the guidance provided in Section 11 -*Assessment of the impacts* of BS4142, which states that "*a difference of +5dB is likely to be an indication of an adverse impact, depending on context*" and that "*Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on context*".

In light of the above, the assessment conclusion of 'low' impact is incorrect because the resultant worse case rated noise level exceeds the background sound level by +3dB and is therefore closer to an assessment outcome of "*an adverse impact, depending on context*". Given the assessment does not report the steps taken to reduced uncertainty (as required by Section 10 – *Reporting Uncertainty*) the actual impact may be greater than reported.

If planning permission is granted, I would therefore recommend that the following condition is imposed.

The 'rating' level of noise emitted from the proposed plant and equipment to be installed on the site (determined using BS 4142:2014+A1:2019 'Methods for rating and assessing industrial and commercial sound') shall be no greater than 3dB above the existing measured 'ambient' noise level  $L_{A90,T}$  during operational hours (07:00 - 18:00).

**Reason:** To protect the amenity of local residents in accordance with Policy QE SP1 of the Adopted Arun Local Plan 2011 – 2031

### **Dust Management Plan**

The Dust Management Plan sets out the measures to be adopted to mitigate dust emissions from the site. These are heavily reliant on staff training/awareness and good management to implement the measures proposed. Environmental Health have recently had sight of photographs sent in from a nearby resident, alleging that existing dust emissions on their property are significant (the photographs appear to support this claim).

It is noted however that the site is regulated by the Environment Agency and noise and dust emissions will be controlled by conditions attached to the Environmental Permit for the site.

Many Thanks

Dave

**Dave Denham**  
Senior Environmental Health Technical Officer  
Environmental Health

