

784-B048969: SOVEREIGN INDUSTRIAL PARK, HUYTON, EHO COMMENT RESPONSE

1.1 INTRODUCTION

This response document has been prepared in response to comments raised by Helen Bradshawe (Environmental Health & Consumer Protection, Knowsley Council) on 21st December 2023, with regard to potential impacts evaluated within the following report submitted in support of a planning application for a new retail/distribution unit at Sovereign Industrial Park, Wilson Road, Huyton (Ref: 23/02782/FUL):

- 784-B048969 Sovereign Industrial Estate Noise Assessment by Tetra Tech, dated 10th Oct 2023

Comments raised by Environmental Health are reproduced in *italics* below, with Tetra Tech responses presented in blue.

1.2 ENVIRONMENTAL HEALTH COMMENTS

Comment 1

The report details a noise assessment using BS8233 and BS4142, however further assessment is required in relation to use of the proposed industrial units of a B2 and a B8, not just a retail unit. Is the site operational for 24 hours?

Response 1

The assessments have been undertaken for the site as a whole, inclusive of B2 and B8 uses – however it is noted that this is unclear within the report text. HGV loading and movements have been included at all units within the assessment, based upon previous observations and assessments undertaken for sites of a similar scale and operational use (additional context provided within Comment 2).

The BS4142 assessment has been undertaken based upon the background night-time noise level across the entirety of the night-time period to present a worst-case assessment, indicative of 24-Hour operation.

Comment 2

A general assessment has been undertaken in relation to HGV transport however it does not detail the number of movements of HGVs within a one-hour period and just ‘presumes’ the majority will be undertaken within the day, how often will they be used at night? Will delivery vans be used, in which slamming of side doors could cause noise? Will cages be used for transporting goods to store if there is no HGV bay? The action of moving the cages around particularly at night could cause noise.

Response 2

For the purposes of the assessment, HGV unloading has been assumed to be occurring simultaneously at all marked bays during both the daytime and night-time (which is considered to be robustly worst-case). Vehicle movements are assumed to correspond directly to the number of HGV loading bays during the daytime (for instance units with 8 HGV loading bays are assumed to have 8 vehicle movements per worst-case hour), and for night-time an assumption of 2 movements per 15-minute period is assumed for all units. Given the duration of HGV unloading and professional experience of similar sites to the proposed, it is considered that this assumption is robustly worst-case.

As HGV unloading bays have been provided and assessed within the site plan, it is not considered that additional unloading shall take place at other non-designated areas across the site.

Comment 3

Will the folk lift trucks and HGVs have reversing beepers?

Response 3

The library data used within the assessment for HGV unloading/parking sources represents an average across the duration of the loading process, inclusive of vehicle arrival/departure and maneuvering. The measurements used within the assessment are inclusive of reversing beepers, so this has been assumed within the assessment. It should be noted that modern HGVs are likely to utilize broadband alarms as opposed to tonal alarms used within the assessment. As such, it is considered likely that noise levels assessed represent a worst-case scenario.

Comment 4

The assessment details that noise mitigation measures are required on predicted levels associated with the noise intrusion assessment (BS8233), however a change in noise level assessment is more appropriate and with residents' windows closed in the day / night there is no observed adverse effect, and therefore no mitigation measures are required. Environmental Health do not agree with this statement. Residents will have windows open throughout the year therefore the noise assessment is required to depict this. Further assessment is required.

Response 4

Upon review, it is considered that the contextual argument presented within the report is unclear. Clarification is provided below:

Based upon the noise levels predicted at R12 – R16, night-time noise levels are in excess of BS 8233 criteria assuming a windows-open scenario. It is noted however that night-time L_{Aeq} noise levels measured at these locations during the baseline noise survey were in excess of 60dB, and so existing external noise levels would also exceed BS 8233 criteria assuming 15dB reduction through an open window. As such, it is considered

contextually appropriate to assume that residents currently either experience noise levels exceeding BS 8233 criteria with windows open, or rely on alternative ventilation measures.

While it is agreed that existing noise levels in excess of guidance do not outright justify exceedances of relevant criteria, it is considered that this context does validate assessment of the site through alternative means – in this instance through an assessment of change in noise level.

Based upon criteria established within IEMA Guidelines for Environmental Noise Impact Assessment (2014), the predicted change in noise level is of ‘Negligible’ significance. As such, it is considered that the assessments undertaken within the report indicate that any adverse impacts will be within the LOAEL when viewed in wider context of the site.

The exception to the above scenario is at R09, which is reported to exceed WHO maximum internal noise level criteria with windows open due to HGV movements that are not currently present at the receptor location. A review of this has been undertaken, and it has been identified that the modelling undertaken for this location overpredicted noise levels by ~9dB through misapplied conversion from broadband levels to spectral levels.

To ensure robust reassessment, maximum noise levels at R09 have been assessed based upon an HGV pass-by maximum level of 82.6 at 3m (which is considered to be worst-case). When reassessed, external maximum noise levels at R09 are predicted to be no greater than 57.4dB, resulting in an internal maximum noise level of 42.4dB $L_{A_{Max}}$ internally – below the WHO criterion of 45dB $L_{A_{Max}}$.

Based upon the above, it is considered that noise levels due to the proposed development are within the LOAEL at adjacent receptors when appraised in context, and additional mitigation is therefore not necessary to protect amenity at surrounding receptors.

End of Document

David Fink

Environmental Consultant

Paul Bentley

Associate