

## Response to EA 3

Thanks for the information that you sent on 14/02/19 and 27/02/19.

The not duly made letter dated 01 February asked for further details in the Noise Impact Assessment (NIA) including the grid references for site roads and traffic numbers.

The document Response 2 to EA that was received on 14/02/19 states:

“The site roads are shown in figure 8 of the Traffic Assessment attached. The traffic numbers are shown on the Table on page 14 of the attached Traffic Assessment.”

There was no attachment called Traffic Assessment with the email of 14/02/19. Do you mean the Transport Statement, Figure 8 Proposed Buildings and Storage Bays and the table referred to in paragraph 4.9 which is on page 14 of the Transport Statement? Confirm that this information is included in the Noise Impact Assessment.

Yes, it is the Traffic Statement being referred to and the figures as you have stated above. I can confirm this information has been included in the Noise Impact Assessment.

Having reviewed the NIA we require a Noise Management Plan (NMP). A NMP is a site specific and standalone document that **identifies the main potential noise sources**, provides an **assessment of impact of noise on sensitive receptors, mitigation measures** to reduce the risk of noise and details on **monitoring methods (especially background noise)**, maintenance and record keeping. [H3 part 2 noise assessment and control](#) Chapters 2 and 3 give details of what you need to include in the NMP and the template for a Noise Management Plan is in Appendix 4.

I have instructed the Noise consultant to do this, to ensure we meet the 10 day deadline. However, I fail to understand why this is required, when the Noise Assessment already provided covers the points you have made, and more. The impact assessment has been conducted in accordance with:

- National Planning Policy Framework, 2012; (NPPF);
- Planning Practice Guidance (Noise), 2014;
- Noise Policy Statement for England 2010; (NPSE);
- World Health Organisation Guidelines for Community Noise (WHO);
- British Standard 8233: 2014 Guidance on sound insulation and noise reduction for buildings (BS8233);
- British Standard BS4142: 2014 Methods for rating and assessing industrial and commercial sound (BS4142); And
- Guidance provided by Natural England.

**It seems a lot of expense for my client to go through, in order to provide the same information again, albeit in a different format / layout. Could you please provide some clarification as to why we need to supply this information twice?**

**Main potential noise sources** – Section 4.1.3 states that the main noise will be from Crushing, Processing and vehicles. The loudest being the crushing.

**Assessment of impact of noise on sensitive receptors** – The report has assessed the impact on all sensitive receptors: SSSI, birds, RAMSAR and residential property. Sensitive receptors are listed in section 2.4. Table 6 shows the background levels at the sensitive receptors and the noise levels from the site and gives ratings of between +0db to +9db. BS4142 states that a difference of around +10db is likely to be an indication of a significant adverse impact; A difference of +5db is likely to be an indication of an adverse impact; The lower the rating level is relative to the measured background

sound level, the less likely it is to have an impact; Where the rating level does not exceed the background sound level, it is deemed as having a low impact.

So, none of the activities on the site are likely to have a significant effect.

ESR1 (Residential) at +2db is unlikely to have an impact. The background noise at this location is high so +2db won't make the existing noise at this sensitive receptor any worse. (Section 4.1.17). No mitigation is needed for this location.

ESR2 (residential) and ESR4 (RAMSAR, Rural) have no impact. No mitigation is needed at these locations.

The only sensitive receptor that has been assessed, in accordance with BS4142, to have a likely adverse (not significant) impact is ESR3 (SSSI) . This is the initial assessment. BS4142 then goes on to advise the dB need to be compared with existing sound levels. The existing background sound level and the rating level are of a similar level and so the site is likely to have a fairly neutral effect ( this is the secondary assessment). BS4142 then goes on to advise that the sensitivity of the receptor needs to be taken into consideration and the sensitivity of the SSSI is high. So, with the sound level V's the sensitivity, the conclusion is that the site is likely to cause a moderate impact. BS4142 is based on humans.

Natural England have advised that birds will begin to react when the Db are above 55. The assessed noise level at the SSSI is 52, below that which will affect birds. However, the Natural England guidance also says that as a general rule, if the noise source is no more than 3dB higher than background levels, it is unlikely to have a significant impact. Table 6 shows that the background noise will be exceeded by 9dB and therefore the assessment recommends some mitigation.

**Mitigation measures** – The assessment has suggested mitigation to reduce the noise by 8dB at ESR3 (SSSI). The report advises that a wooden 2.5m closed board fence or concrete block wall will achieve this mitigation. Towns will have a concrete wall and this brings the noise over background level to +2 at ESR3, bringing it below the level that affects birds.

**Monitoring methods (especially background noise)** – The report states that the methods are in accordance with current guidance. The assessment methodology was also agreed with Martin Stoyles, Environmental Health Officer at Sedgemoor District Council, before the assessment was carried out.

Section 2.3.1 details the methodology but in particular section 2.3.14 states that BS4142 assesses the significance of impacts by comparing the specific noise level to the background noise level (LA90).

Section 3 provides details of the background noise survey undertaken and the assessment has included the background noise of: Road traffic, Industrial Noise, Birdsong and other sources.

In accordance with BS4142, the assessment has taken account of the absolute level of sound, the character of the area, the residual sound and the sensitivities of the receptors. The whole basis of the assessment is based on the increased noise levels, above existing background levels and has stated that a difference of around +10db is likely to be an indication of a significant adverse impact; A difference of +5db is likely to be an indication of an adverse impact; The lower the rating level is

relative to the measured background sound level, the less likely it is to have an impact; Where the rating level does not exceed the background sound level, it is deemed as having a low impact.