



Ref: P3771/L03/PJK (email attachment)

21 October 2020

To:	Daniel Wright	of:	Bovis Homes
Cc:	Distribution List	of:	

Dear Daniel,

Horner Avenue, Fradley – Response to Comments from Fradley and Streethay Parish Council

I have reviewed the comments presented by in the Fradley and Streethay Parish Council letter dated 7 October 2020, in relation to AEC's noise assessment P3771/R02a/PJK (the Report) dated 17 August 2020.

Fradley and Streethay Parish Council comments relating to noise have been reproduced in italics below, followed by AEC's comments in blue beneath.

"22. The acoustic measurements in the Noise Assessment were not taken at the peak of either rush hour. Therefore, they will be an under-representation the traffic noise from the A38. The times they were recorded were 0500 and 0700h and 0930 and 1230h."

As stated in Paragraph 4.2 of the Report, measurements of road traffic on the A38 were undertaken in accordance with the Department of Transport, Welsh Office, document 'Calculation of Road Traffic Noise' (CRTN) issued in 1988.

CRTN presents the shortened measurement procedure which uses the $L_{A10,T}$ levels measured over 3 consecutive hours during the period 1000h to 1700h into an 18-hour (0600 to 2400h) L_{A10} level. A further correction is applied in accordance with BS 8233:2014 'Guidance on sound insulation and noise reduction for buildings' (BS8233) to give the 16-hour (0700 to 2300h) daytime ambient noise level.

In addition, it should be noted that the $L_{Aeq,T}$ and $L_{A10,T}$ noise levels were consistent between 0615h and 1230h. Therefore, it is considered that the measured noise levels are representative of noise from the A38.

"23. Furthermore, the former Great Bear depot was being wound down at the time of the survey and the new operators that have taken it over now have a very busy depot with new buildings and extra capacity. Again, noise will be greater than measured."

AEC was aware that the Great Bear facility was closing down, and it was noted in paragraph 2.9 that the site was not operating at full capacity during the noise assessment.

Therefore, AEC undertook an assessment of noise from the site based on AEC experience of other fully operational distribution sites and not the noise levels measured by AEC during the daytime and night-time noise surveys. In addition, the assessment is based on the activities all occurring at a location close to the proposed development, when in fact the activities would occur across the depot, therefore, AEC has been conservative when estimating noise from the depot.

“24. The noise assessment identifies in paragraph 5.34 to 5.37 that a significant number of residential properties will need ventilation provided by means other than simply opening a window. Paragraphs 6.21 and 6.22 then explain what mitigation is provided to address this. They state:

“6.21 There are a number of different ways of providing the suitable levels of ventilation to control overheating and achieve the required internal noise levels. These include mechanical systems or providing windows which when in the open position provide a greater external to internal noise reduction.

6.22 Once the properties at risk of excessive internal temperatures has been identified by others a further review could be required.”

25. What is clear is that the residents of many properties will be unable to open their windows for significant parts of the day and night (in order to cool their properties) without being subjected to unacceptably high levels of noise. Moreover, it would appear from the conclusion in paragraph 6.22 that acceptable mitigation has not been provided.”

Details of acoustic trickle vents to achieve Lichfield District Council's internal noise level requirements, while providing whole dwelling ventilation, are presented in Table 6.1, in Section 6, of the report. These would satisfy the requirements of Lichfield District Council and Approved Document F 'Ventilation' (2010) of the Building Regulations and avoid the need to open windows.

In relation to the control of overheating, the Report states that *“all habitable rooms can be have windows open to provide comfort cooling during the daytime period”*. Daytime noise levels will not be unacceptable high in accordance with AVO guidance.

During the night-time period, if it is determined by others that there is a low risk of overheating in the properties, no additional mitigation measures are required, i.e. provided others confirming that overheating at night is not a regular occurrence then open windows can be utilised on these limited number of occasions.

With the provision of the 5m high acoustic bund, maximum noise levels in the houses overlooking the distribution centres, with windows open for ventilation purposes (assuming a -13dB reduction) internal maximum noise levels would be around $50\text{dB}_{L_{Amax,F}}$. This level would be in the lower part of the medium risk category and should therefore be acceptable if windows were, at times, required to be open to control overheating.

I trust the above is clear and of assistance at this stage, if you require further assistance please get in contact.

Yours sincerely



Paul Knowles

Checked by: DMT