

Airshed Environmental Noise Assessment Westloch Farm report further representations.

Please note the following points for consideration by the LRP.

Executive summary

1). "Site operations will take place between 07:00 and 19:00. Without control measures, sound from the proposed development has the potential to adversely affect the amenity of existing noise-sensitive receptors near the development. No night-time operations are proposed, so that sleep disturbance is not a material consideration."

This statement makes an invalid assumption that as no night-time operations are proposed sleep disturbance is not a material consideration. This is, of course, nonsense. Airshed has no method and has not tried to establish what the working schedule of the existing residents is, nor can they judge the working schedule of the future residents of the steading. I can advise for a fact that at present :-

- A. One resident working in the care sector works extremely variable hours, often long night shifts, and so sleep disturbance during the day is a VERY material consideration. In fact the resident's purchase of the property was precisely because it was so quiet.
- B. Another resident is a sheep farmer and if Airshed thinks the only hours such a farmer works is between 0700-1900 then perhaps they need to educate themselves. Consequently this resident too, may need to catch up sleep in the daytime.
- C. Future residents of the Steading's work patterns are completely unknown, some could be e.g. caring for elderly relatives and grabbing sleep when they can.

2) Then we come to the prediction of 'Low Adverse Impact' - already based on the false assumption in (1) above. So even with mitigation it is **still** of adverse impact.

3) 'Neutral/Slight Adverse significance.... At the isolated dwelling immediately to the south of the development". As far as I can tell there are NO isolated dwellings to the south. The farmhouse and its associated buildings is NNW of the proposed development.

4) "The proposed mitigation measures include, locating the access doors of the noise-generating buildings on the south-west elevation, fitting a high level of acoustic insulation and automatic self-closing doors".

It is interesting that these 'mitigation measures' have suddenly appeared in Airshed's assessment, we can find no such measures mentioned in any form in the original application or the appeal. It should also be noted that without some system that interrupts the operation of the internal machinery when the doors are open, then it would not matter whether they are self closing or not from a noise perspective.

Glossary

It is important that the LRP understands dB and what its actual effect is.

This is not made clear in Airshed's documentation. Whether this is a 'baffle them with science' approach or simply the assumption made by some engineers that others understand these terms fully and in context we don't know.

dB measurements are made on a logarithmic scale instead of linear like, for example, distance measurements. So for each 10dB the sound intensity has increased ten times. So, for example, 20dB is 10 times more intense than 10dB, it isn't twice as intense. So each single dB represents a very significant increase.

Adding sound sources measured in dB is also different . For example two sources at say, 50dB yield an increase of 3dB to 53dB, but remember that sound is now THREE times more intense than the single 50dB sound. Basically a little change in dB means a LOT of sound intensity change.

Perceived loudness is something else again and is affected by many factors some of which are covered by Airshed's explanation, however all are approximations to an 'ideal standard' which in reality does not exist. All of us have experience of how some sounds affect people more than others and often it is not the loudness as such but the frequency and type of sound, continual, staccato etc that affects individuals the most. From personal experience on ships for 50 years or more (which are noisy environments), humans become used to steady level continual noise as their brains factor it out. Staccato sound is a very different matter and even the cessation of a normal continual background noise will awaken the deepest sleeper.

Introduction

1.7 - " . The proposed development will not involve any night-time working so that the effects of sleep disturbance are not relevant and have not been considered further. "

This was not an assumption they were qualified to make.

Sound from Proposed Installation

5.3 - "Sound levels reported assume there will be no tonal, intermittent or impulsive characteristics associated with any fixed plant."

This is a plant wood chipping huge individual logs! Seriously? There will be no intermittency, no impulsive characteristics and no tonal variations?? Really? This just indicates that Airshed have no conception of what wood chipping actually sounds like. It is not continuous or monotone and it is very impulsive as anyone who lives, like us, in the country and has experience of the associated wood chipping noises that goes on with periodic forestry extraction and the chipping of brushwood will know.

5.4 - "The worst-case rated specific sound level during the day (07:00 – 19:00) is predicted to be +3 dB above the background sound level. This is based on realistic worst-case assumptions about activities at the proposed installation, with the mitigation measures in place."

So this is a sound intensity THREE times the background noise intensity and is a BEST case scenario if all the proposed mitigation measures are in place and work as modelled. Note the prediction errors are +3dB (section 5.6 Uncertainty), so actually the sound intensity could be SIX times the background level if all the mitigation measures are in place and working as modelled. Any variation such as doors left open, machinery being noisier than predicted will serve to increase this. This isn't a 'worst case' it is a best case scenario.

Conclusions

7.4 - "Sound from the proposed installation is predicted to be of Low Adverse impact in terms of BS 4142:2014+A1:2019, subject to the successful implementation of the mitigation measures set out in Section 6. "

So this installation even with all mitigation measures in place and every single one of Airshed's 'assumptions' being correct still results in an Adverse impact on what they describe as :-

"The acoustic environment is exceptionally quiet"

I would respectfully suggest that the best method of retaining that exceptionally quiet environment is to refuse the application.

7.6 - "The proposed mitigation measures include restricting the hours of operation, locating the access doors of the noise-generating buildings on the south-west elevation, fitting a high level of

acoustic insulation and automatic self-closing doors, the erection a substantial amenity bund and the adoption of appropriate working methods to minimise impacts on amenity. “

Reality is that once planning is approved there will be no way of monitoring or enforcing these mitigation measures.

- The mitigation measures do not return the area to the present quiet environment. They produce an adverse impact on the nearby residences.
- The restricted hours of operation do not in anyway assist night workers of which there are at least two in the existing residences.
- The substantial bunds will have an immense and immediate impact on the local topography and environment never mind the construction noise involved.
- What appropriate working methods and who decides whether they are appropriate or not? I would remind the board that this applicant has changed and twisted their original application several times in an attempt to wiggle through the existing development plan and its measures,
 - has tried to portray the Planning Officer as incompetent, and
 - has discarded their own fundamental requirements for a suitable site, (1000m separation and a three phase power supply).

We respectfully request that this application and the appeal are refused and the applicant seeks a far more suitable site for his noisy industrial process that also meets their own requirements as per the original application.

Yours Faithfully

CM & MA Airey