

Dear Tina,

Planning Application: APP/25/01015

Description: Part retention of ground floor commercial unit (Class E); conversion of remainder of ground floor and first floor to form 8 x 1 bed flats (Class C3); construction of 2nd floor with recessed 3rd floor mansard roof to form 12 bed Shared Living Property (HMO - Sui Generis); with associated parking, refuse and landscaping.

Site Address: 212-218 London Road, Waterloooville, PO7 7AJ

Re: Noise Information

The acoustic information does not satisfactorily determine noise levels at the rear facade or demonstrate that the sound insulation performance of the proposed glazing and ventilation scheme, and proposed acoustic barrier, shall result in target internal and external amenity area noise levels being achieved.

Methodology in the reports does not wholly comply with relevant guidance. At this stage, refusal is recommended based on insufficient noise information.

It is anticipated that target noise levels can be achieved providing suitable mitigation measures are implemented, however this is not satisfactorily determined in the reports.

The following notes are for the attention of the acoustic consultant.

There are elements of both reports which introduce confusion.

The executive summary of the original report includes that the purpose of the report is to assess noise impacts... in particular to bedrooms that will be located on both the Western and Northern facades. The acoustic design statement then states that there shall be no windows on the northern elevation.

The initial noise report introduces confusion as to the claimed noise level at the rear facade due to inconsistencies between section 6 and 7.7 in the report. There is no clear explanation of how the baseline noise levels at the rear facade have been calculated using measurement data from the front and side facade. One of the tables indicates the rear facade level is -15dB from the front facade level, which relies on assumption and does not present robust determination.

A further noise survey (and / or noise modelling) was requested to establish noise levels at the rear facade; this has not been submitted.

Technical Note – TN0064 (dated 26th January)

The assessment in the Technical note does not fully accord with BS4142 methodology and there are significant omissions in information that should be included in the report, as per section 12 of BS4142.

The summarised background noise data is presented in the first table. It is presumed this measurement was also taken at ML 2 during the original noise survey between 20th to 23rd November 2025. ML 2 was positioned at the northern facade adjacent to the petrol station and closer to the road than the rear facade. The background noise measurement location is therefore not considered to be representative of noise at the receptor (rear facade). No adjustment, justification or correlation has been included in the assessment. Background noise levels at the rear facade may be significantly different to the measurement location.

The referenced background noise level is between 0500 - 0600, however the noise assessment considers a reference period of 1 hour. Whilst the author offers that this is representative of lowest background noise levels, it is an unusual approach for a BS4142 assessment and does not accord with time referencing in the guidance. Typically, hours between 23:00 - 07:00 would use a 15-minute reference period for the assessment and hours between 07:00 - 23:00 would use 1 hour.

Delivery Calculations – SEL Values

The SEL calculation is unreliable as no duration is included for the events assessed: arrival, reversing and leaving. The assessment uses a value for all noise energy for one

second then adjusts to one hour, the results are therefore based on each event lasting only one second. This is not representative of time taken for the activities and significantly under represents noise from these activities at the receptor.

The use of SEL value here is not appropriate as the events are comprised of multiple noise sources such as engine noise, air brakes, reversing alarms, slow manoeuvres and cab door closing.

SEL measurements are not typically considered in BS4142 assessment methodology.

Historic Data – LAeq, T & LAmax Values

The historic data assessment considers the LAeq during arrival, unloading and departure which is then adjusted for 1 hour. This is a more typical and robust method to assess delivery noise in accordance with BS4142.

The report assumes there are no deliveries before 07:00, however this assumption does not appear to be supported by information from the petrol filling station.

The resultant noise level is +28dB above the presented background noise level , this would normally be recognised as indicative of a significant adverse impact in a BS4142 before context is considered. The reporting of initial estimate of the impacts should be included (section 12 BS4142).

Neither assessment considers unloading equipment which may include roll cages which are known to be a significant noise source and could introduce highly perceptible tonality at the receptor. No information has been obtained from the PFS regarding delivery frequency or times, or unloading equipment used. Specific information of noise sources have not been obtained from the PFS (such as external plant), assessment is based on assumed noise sources without definitive identification of noise sources. Clarification is required.

No uncertainty budget has been included in the report. There are several factors listed in section 10.2 of BS4142 that should be considered in the report and an appropriate uncertainty budget included.

Vehicle movements in PFS

The report presents two sets of historical data to consider noise from vehicle movements at the PFS (similar sized site and similar size site in Portchester). The

historical data includes disparity of 3dB LAeq and 7dB LAmix. This introduces confusion.

In response to previous concerns raised regarding noise from commercial activities at Wickes, the technical note does not provide the requested quantitative assessment. Instead, assumptions are made that noise from activities and plant at Wickes will be negligible due to screening by two buildings. However, the report provides no calculations to support this assumption.

No information has been provided to substantiate that unloading noise at Wickes is comparable to unloading noise at the PFS, or the frequency or times of deliveries. No definitive identification of plant at Wickes is included. The aerial view on google maps shows that there is a small yard at the rear of Wickes (waste storage perhaps), however it is unclear if there is any external plant to the rear of Wickes that may impact the proposed development.

A review of aerial imagery (see below) indicates a clear line of sight between the PFS yard and the Wickes service yard along a hard-surfaced corridor between the PFS courtyard and Enterprise Car and Van Hire. This configuration could allow for efficient propagation and reflection of service-yard noise.

A review of street maps shows an HGV in Wickes service yard with palletised goods, indicating that a forklift may be used for unloading.

The assessment of noise sources at the PFS is based on historical data and predicted noise levels at the receptor, however the noise source is existing and therefore real time measurements of noise sources should be undertaken in free-field conditions at the receptor.

Section 7.3.6 of BS4142 includes:

Determine the specific sound level by calculation alone if measurement is not practicable, for example if the source is not yet in operation. In such cases, report the method of calculation in detail and give the reason for using it.

BS4142 compliance

There are significant omissions from the information required to be reported as detailed in section 12 of BS4142.

Line of sight from rear facade to Wickes service yard.



The noise assessment is not considered to robustly comply with BS4142 methodology and significant elements of the noise information presented are not acceptable as they rely upon unsubstantiated assumptions including low confidence in representative background noise levels at the rear facade.

It is anticipated that a reasonable level of amenity can be achieved with appropriate mitigation, however the noise assessments do not provide the required information to satisfactorily demonstrate this.

The following further information is required.

- Clear and concise determination of noise levels at the rear facade of the development to include 16hr LAeq, 8hr LAeq and LMax incidents through the night to determine noise mitigation measures required for road traffic noise.
- Identification of all potential noise sources that could impact the rear facade of the development, to include any nearby air handling units and commercial operations and plant at nearby premises.
- A BS4142 assessment of all relevant commercial noise sources based on measurements of noise sources at the receptor location and inclusion of all information to be reported as detailed in section 12 of BS4142.
- Revision of mitigation measures based on the results of the further assessments.
- All findings to be evidence based with any assumptions fully justified by calculations / quantitative data. (e.g. if noise from delivery and loading activities at Wickes = 60dB LAeq, 1hr at 10m. Then $60 - 20\log(55/10) = 45\text{dB}$ at receptor. Specific noise - background = +7dB, indicative of adverse impact. Context to consider external amenity area, ambient noise levels and dominant noise sources, sound insulation of building envelope to contextualise internal noise levels, conclude with impact after context is considered).

Kind regards,

Craig Milligan

Environmental Health Officer