

Sarah Westwood

From: James Russell
Sent: 01 March 2013 12:59
To: Sarah Westwood
Subject: Planning Application Standen Hall Housing development, Clitheroe Ref: 32012 0942P

Dear Sarah,

Have evaluated the AMEC Environmental Impact Assessment (EIA) Report dated October 2012, submitted in conjunction with this application. Sincere apologies for the delay. I have sought consultancy advice in relation to air quality and the identified impact upon the Whalley Road Air Quality Management Area;

The report appears comprehensive, however, I shall make the following observations;

Control of Noise:

- This site is to be a large and long-term construction site. I concur the consultants suggested condition that
 - construction be undertaken in accordance with BS 5228:2009 Code Of Practice titled 'Noise and Vibration Control on Construction and Open Sites', as such ask for condition to require Dust & Noise Management Plans for the construction phase; and in particular,
 - Construction hrs to be restricted to Mon-Fri 08.00-18.00, Sat 09.00-13.00 and no construction permitted on Sun or Bank Holidays.
 - A noise management plan should be provided before commencement of construction, to include;
 - details of improved spec on glazing and alternative ventilation,
 - details of acoustic heavy duty fencing and locations,
 - location of site office, compound and storage.
 - wheel wash
- Furthermore, construction to be undertaken in accordance with the mitigation measures as described in Section 10.5.1 of the EIA. Furthermore, the mitigation measures to be extended to require no deliveries or vehicles to arrive on site outside stipulated working hours;
- Ref: 10.8.1: Developer be required to achieve noise rating level for fixed items of plant to be 5dB below existing background levels;
- I am concerned that report identifies that some residential properties including retirement accommodation will only achieve NEC Cat B noise criteria which I believe is unacceptable for a new development. Either, residential properties (including retirement accom) should be limited to the areas achieving NEC Cat A external noise criteria or that suitable acoustic measures be provided and incorporated to both the buildings and site perimeter to ensure residential properties achieve NEC Cat A noise criteria. This to include outdoor living areas be so placed on the opposite side of buildings from the nearest traffic noise sources. This is particularly relevant for those properties facing onto Pendle Road and the A59.
- Applying a precautionary principle,
 - Glazing- requires further consideration and a tighter spec included as a condition. Table 10.2.1 has a different Rw value for the same glazing as used in the other tables. This needs checking and a higher glazing spec included at these properties to meet the 35Rw. In addition trickle ventilation will be required as a level of 67dB outside will result in 57dB inside with an open window. 12dB above the maximum we are aiming for. The same applies to the living room and bedroom averages. With an open window the levels are too high and therefore there is a need to provide alternative ventilation for residents to have a choice.
- it would appear reasonable that the properties to the southern and eastern parts of the site be fitted with an enhanced glazing system with acoustic vents and MEV. **I would recommend that the applicant/noise consultant be required to review and remodel the report with a view to achieving the WHO 'external' standard of 40 dB(A) LAeq** It will probably be necessary to consider a perimeter acoustic 'heavy duty' closed boarded timber fence be raised on a suitable embankment.
- Outdoor amenity areas as suggested should be placed on the far side of buildings away from noise sources (detailed stage) in addition, heavy duty close boarded acoustic fences should be used on those most at risk to reduce noise levels below 50dB in these areas.
- Ref: 10.5.1: That noise attenuation be further considered in relation to residential and office units to achieve internal noise levels resulting from external noise exposure to at least meet the BS 8233 noise level criteria of 'Good'.

- Opening time restrictions may be required on some commercial units.
- Details of all extraction, ventilation etc would be required for the commercial and school (include odour assessment) plus an assessment on any biomass the school may wish to include .
- The school location, backing onto existing houses is not ideal or recommended, nor is the park being sited to the northeast corner

Air Quality

- **General:** When determining this application, It will be necessary to balance the need for housing against AQ impacts, at the moment, any developments of any size in Clitheroe are likely to have a 'small/negligible' affect on air quality but when combined together, will result in increased problems and issues where result in incidences of current AQO's, particularly if the emissions from vehicles continue not to reduce inline with DEFRA expectations over the next 10-15 yrs.

Specific

- Noise and air quality data do not appear to agree. The percentage of HGV movements in 2020 with and without the development are not the same. Ref Table 10.5.1 & Table 11.2.1 in the appendix. These differences will affect the results for both AQ and noise. This need's to be confirmed and the relevant calculations re-done. Please can the worse case scenario be calculated for each location.
 - The report identifies (Section 11.5.2 - P. 233) that due to the size and close proximity of the existing residents to the site boundary on the northern edge, the existing residents are considered to be at 'High Risk' of dust effects from earthworks and construction activities. As such the report identifies that there is a need to **use appropriate dust mitigation measures for a 'High Risk' site as outlined in IAQM guidance;**
 - The report identifies (Section 11.5.2 - P.233) that due to increased numbers of vehicles, this development will have an impact and will add to and increase the levels of NO₂, which are already of concern and has resulted in the declaration of the Whalley Road Air Quality Management Area. Whilst the increased contribution is relatively small and arguably imperceptible, being in the order of 0.41 micrograms per metre cube (ugms/m³) ie 1%, **this is predicted to result in the increase of current annual mean levels from 41.5 to 42 ugms/m³, where the National Air Quality Objective sets a limit of 40.** With resident vehicle site access being limited to Pendle Road, the predicted most significant impact will be seen on Waterloo Road where an increase in traffic of more than 10% as a result of this development. However, the increased level in this area will be in the order of 0.7 ugms/m³ but will remain well within the air Quality Objective of 40 ugms/m³. **It would appear appropriate to ask that the scheme be reviewed with regard to increasing development egress points, improve traffic flow and direction generally, to minimise 'increased' traffic through the Whalley Road/St James's Street road junction and minimise increase in NO₂.**
 - The assessment does not appear to consider any traffic turning out of the site onto Littlemoor Road ? A further detailed AQ impact assessment will be necessary if this option is to be considered;
 - That a condition be applied requiring construction and delivery vehicles to have restricted routed access, with access only from the A59
 - Paragraph 11.3.1 states they have gathered continuous and passive monitoring info from RVBC, we don't have continuous data ? also the nearest AURN station is not anywhere near to the site location and is therefore considered not representative. Furthermore, the document states there are no Part A or B installations within 1Km, there is at least one possibly two (need to confirm distances), the first is Primrose (Texaco) Garage on Whalley Road, Chatburn Road Filling Station and James Alpes, Lincoln Way
 - NO_x tube data, we are awaiting validation of 2012 levels, but the 2012 results suggest a substantial increase in levels in the AQMA against government predicted, and therefore background map trends. Also the results for 2012 are far more constant.
- Suggest liaison with County and see if possible to obtain funding for a bike scheme for each house, this will reduce traffic entering Clitheroe from the site if they can cycle. County have more info (Neil Stevens?).

James

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