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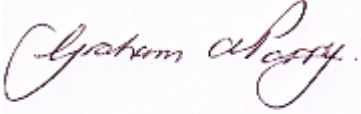
PRC Architecture & Planning

Headley Road East, Woodley

Expert Witness Statement for Noise

Status: Final

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1. INTRODUCTION

1.1. Background

The purpose of this expert witness statement is to support a proposal to remove Condition 32 of Planning Consent Reference: 25083, application to vary Condition 32 of Planning Consent 213106 (granted at appeal, ref: APP/X0360/W/22/3306963), as varied by Section 73 of Town and Country Planning Act 1990 (as amended) Planning Permission 242532, for the proposed erection of 5 no. buildings for commercial development to provide flexible light industrial, general industrial, and storage and distribution uses, with ancillary offices, associated car parking, formation of new accesses, and landscape planting, following demolition of existing buildings. Condition 32 refers to the timing of deliveries at Units 9 and 10 and the proposal is to vary the condition to lift the restriction in respect of Unit 9 only.

Condition 32 (Planning Reference: 25083, relates to the permitted hours for deliveries and is provided below:

“No deliveries shall be accepted or dispatched from Unit10 between 2300hrs and 0700hrs the following day”.

The site location is identified in **Figure 1.1**. Units 9 and 10 are highlighted in red, and the nearest Noise Sensitive Receptor (NSR), located at Lilly May Court, is also identified. Delivered, an established delivery company, operates 24/7 from a unit immediately north of Lilly May Court without restriction. Deliveries from Delivered take place throughout the night-time period (2300 hrs to 0700 hrs). Units 9 and 10 (highlighted in orange) are identified in **Figure 1.2**. The Units providing significant shielding of activities which occur in the near vicinity of the Units.

Figure 1.1: Site Location

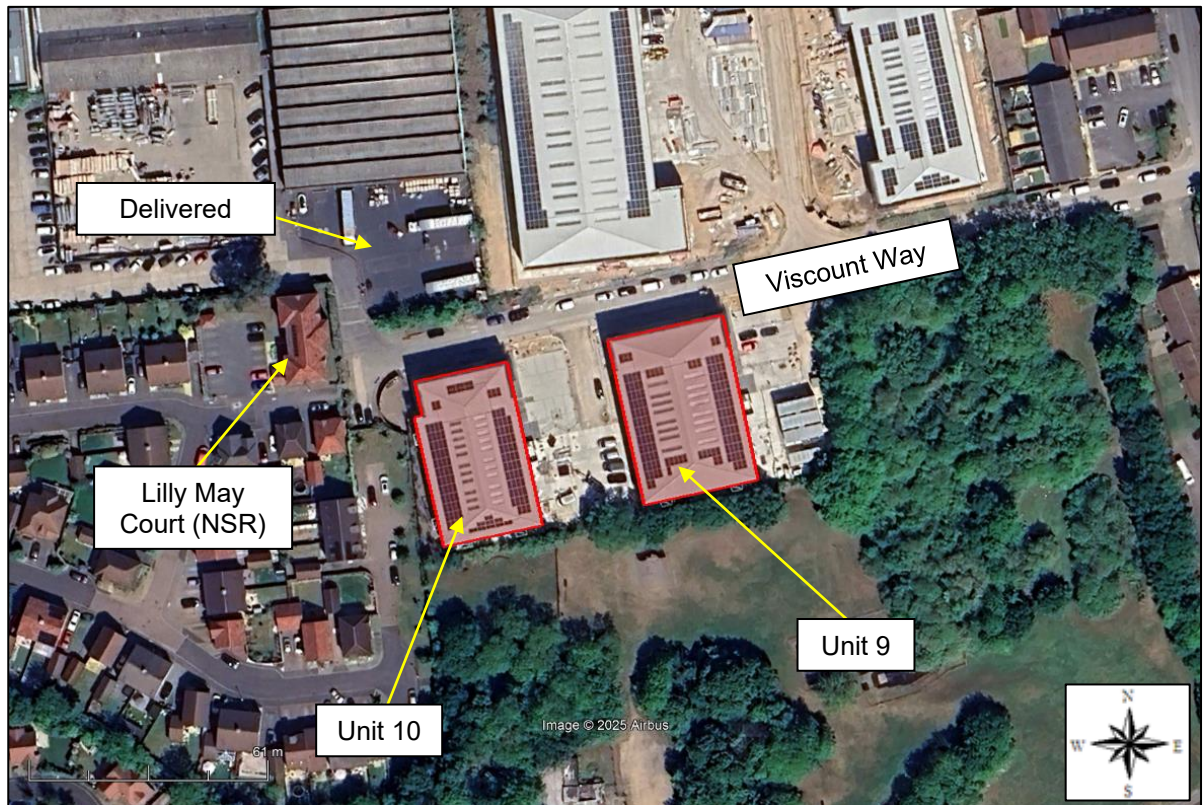
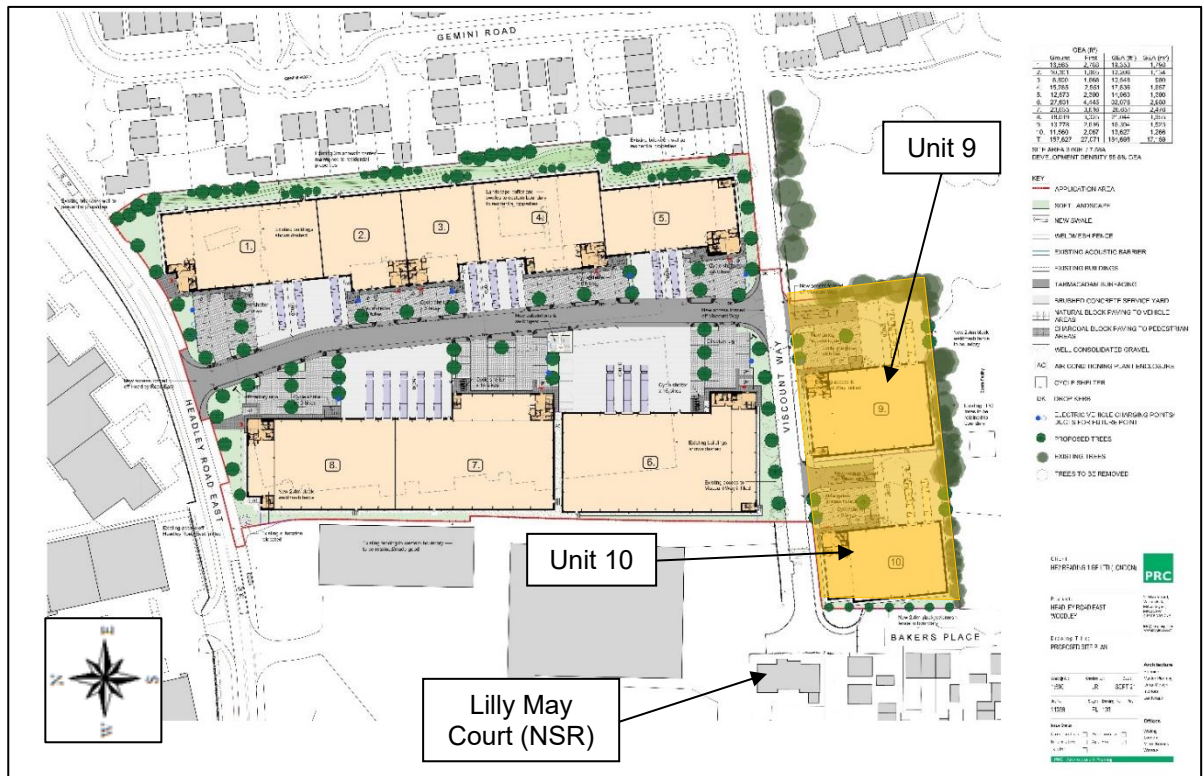


Figure 1.2: Site Plan



1.2. Experience of Author

Graham Parry has carried out environmental work in the transportation, chemical, mining, petrochemical and architectural fields and worked extensively in the United Kingdom and internationally (including France, Spain, Finland, the Republic of Ireland, USA, Brazil, South Africa, Hong Kong, Australia and Libya). He is experienced in the co-ordination and management of multi-disciplinary teams working on environmental issues, including noise, vibration, dust, odour, water quality, ecology, landscape and air quality. He has over 50 years of acoustic experience both in Local Government and consultancy and has been actively involved in providing advice to Government departments, Local Authorities, developers and contractors in relation to the environmental aspects of development, policy and guidelines. He is a frequent contributor to a variety of conferences and has published a number of papers and contributed to books on environmental noise issues and impact. He was until 2022 a Vice President of the Institute of Acoustics of which he is a Fellow and recently stepped down after a 4-year term as the President of the Association of Noise Consultants (ANC). He was also a Director of the International Institute for Noise & Vibration (IIAV).

He has presented expert evidence at Public Inquiries, land tribunals, court hearings, House of Lords & Commons Select Committees etc, in respect of noise and health impacts. He has also served on Government and professional body working parties, developing noise guidance methodologies, and assisting with the drafting of legislation relating to noise.

He has been the project Director/Manager for several noise related research projects on behalf of the government department DEFRA within the United Kingdom. He serves or has served on a number of committees and working parties including the following:

- Founder Member and joint author of the IEMA 'Noise Impact Assessment Guidelines'
- Steering Group Member for the CIRIA Research Project and publication 'Noise and Vibration from Road & Rail'
- UK Delegate to NATO Working Party 'Pilot Study on the Effects of Public Works Projects on the Environment'
- ANC Steering Group Joint Chairman for a new 'Environmental Noise Measurement Guidelines' handbook.

He has also provided environmental training on behalf of DFID in Ghana on new construction projects and was the Environmental Guidelines Manager for a World Bank project on behalf of the Royal Thai Government. He has provided advice and training to the Planning Inspectorate in respect of environmental issues of renewable energy projects. He is also the Project Director in respect of providing technical support to DEFRA in respect of noise issues for the next 4 years.

2. NOISE IMPACT ASSESSMENT

2.1. Noise Impact Assessment in previously issued Technical Note (Dated 28.06.2024)

ACCON previously issued a Technical Note (dated 28.06.2024) in order to quantify the impact of delivery noise at the nearest Noise Sensitive Receptor (NSR) in respect of removing the condition related to operational delivery hours for Units 9 and 10 at Headley Road East, so that deliveries could be accepted or dispatched from Units 9 and 10 throughout the night-time period (2300 hrs to 0700 hrs).

Appendix 3 provides a glossary of acoustic terminology.

It was concluded that even with additional HGV movements, there was No Observed Adverse Effect Level in line with the Noise Policy Statement for England and therefore, it was ACCONs consideration that Planning Condition 32 could be removed.

The Technical Note in full is provided in **Appendix 1**.

2.2. Technical Note (Dated 05.09.2024)

A subsequent Technical Note was issued on 5th September 2024 in response to comments from Wokingham Borough Council Environmental Health concerning the proposed removal of Condition 32 of Appeal Reference APP/X0360/W/22/3306963. One of the key points raised was:

“Why was the noise assessment not provided in a BS 4142 format, separate from previous submissions?”

It was demonstrated that as a worst case scenario, there would be a maximum 4 - 5 dB increase above the background noise level between 0300 hrs and 0500 hrs for both the first floor and second floor in the BS 4142 assessment, which could be classified as LOEL (Lowest Observed Adverse Effect Level). It was also noted that if the assessment was applied only to the full night-time period (2300 hrs – 0700 hrs), in line with the standard BS 4142 approach, then the assessment would identify that the Rating Noise Level would only exceed the background noise level by +1 dBA.

The Technical Note in full is identified in **Appendix 2**.

2.3. ACCON Noise Measurement Study – 18th September 2025 to 19th September 2025

Following lengthy discussions, the Local Authority granted consent for the Section 73 Submission 250823 on the 9th May 2023 removing any restriction on Unit 9 but retaining the delivery/dispatch hours of use restriction on Unit 10. As the Local Authority had identified that their primary concern was that night-time noise events could result in sleep disturbance and in order to inform this appeal, ACCON has subsequently carried out a further detailed noise measurement survey at Lilly May Court to monitor night-time L_{AFmax} events associated with traffic from Viscount Way and other activity noise relating to ‘Delivered’ on a typical weekday.

An unattended noise measurement survey was carried out between 1500 hrs on Thursday 18th September 2025 and 0840 hrs on Friday 19th September 2025

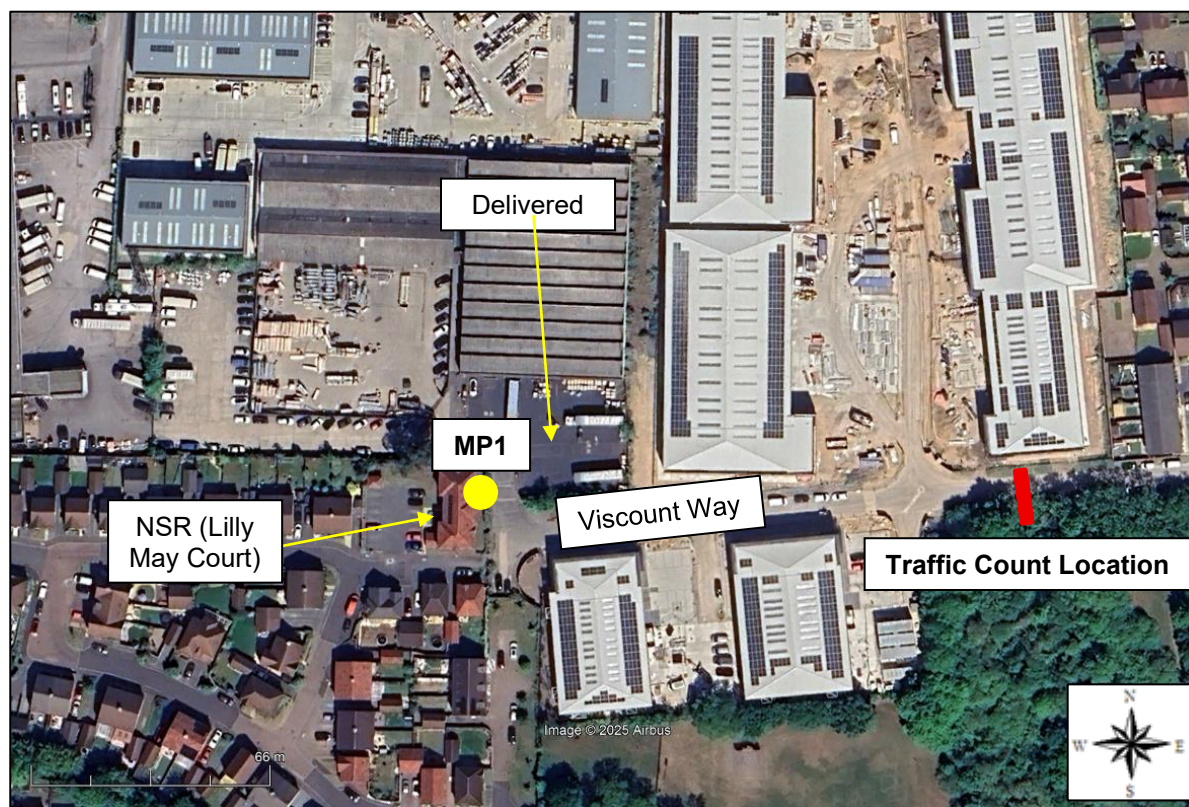
The noise measurements utilised one Svantek 971 Class 1 Sound Level Meter (SLM). The SLM holds a current certificate of calibration, which is available upon request. Before and after the noise measurement period, the equipment was field calibrated in order to ensure that the equipment had remained within reasonable calibration limits (± 0.5 dB).

Table 2.1 provides the location of the noise survey measurements and the observed noise sources during the noise survey. **Figure 2.1** identifies the position of the noise measurement.

Table 2.1: Noise Survey Locations

Location Reference	Location Description	Measurement Duration	Observed Noise Sources
Measurement Position 1 (MP1)	The microphone was located 1m from the eastern façade of Lilly May Court at a height of 4.5 metres.	17 hours and 40 mins.	General activity and delivery noise from 'Delivered' was the dominant noise source. Occasional road traffic movement noise from Viscount Way was also observed

Figure 2.1: Noise Measurement Positions



The summary of the unattended noise measurement data for the night-time period is presented in **Table 2.2**. The hourly noise measurement results for **MP1** are provided in **Appendix 3**. The audio files from the noise measurement survey have been reviewed in order to identify the nature and source of specific noise events.

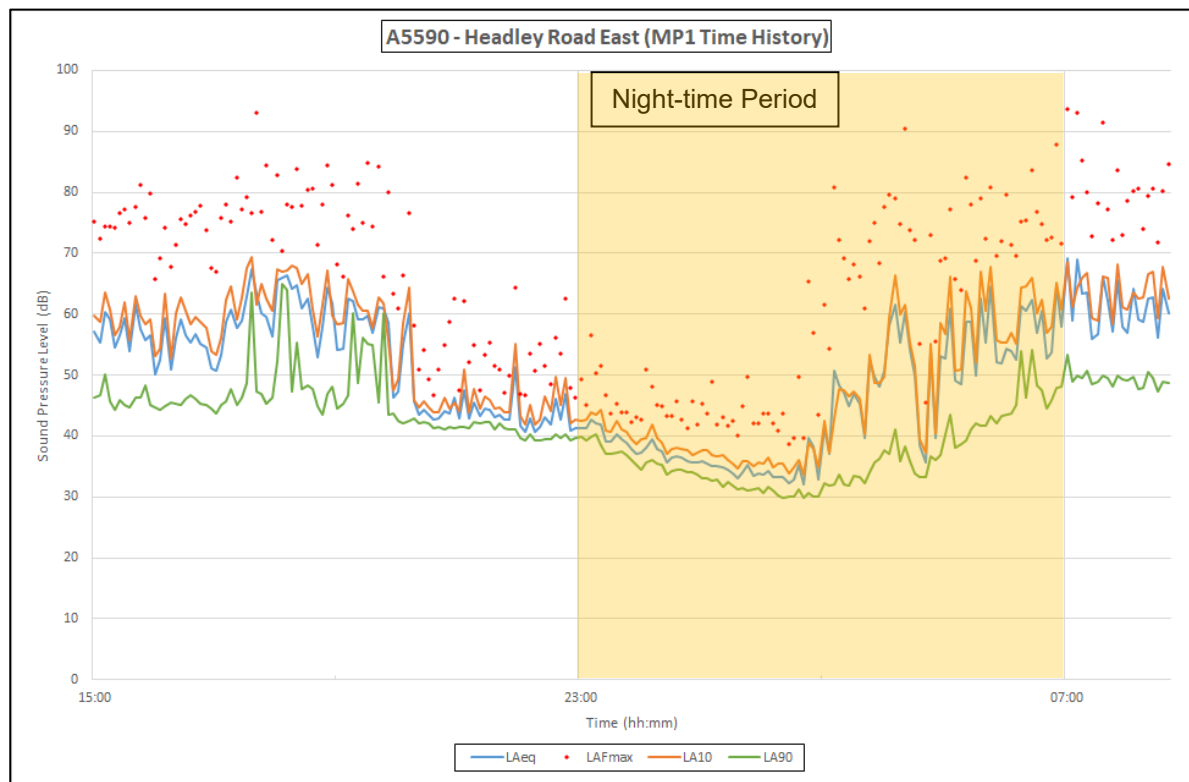
Table 2.2: Unattended Noise Measurement Summary

Position	Date	Period	$L_{Aeq,T}$ (dB)	L_{AFmax} (dB)	$L_{A10,T}$ (dB)	Mean $L_{A90,T}$ (dB)	Modal $L_{A90,T}$ (dB)
MP1	18.09.2025 – 19.09.2025	2300 hrs – 0700 hrs	54	90 (79)	46	37	32

Note: The levels stated are logarithmic average for $L_{Aeq,T}$ and arithmetic averages for $L_{A10,T}$ and mean $L_{A90,T}$. The L_{AFmax} is the average of the highest hourly maximum sound levels measured during the measurement period, measured with a fast time-weighting. The L_{AFmax} levels in brackets are the tenth highest L_{AFmax} noise levels measured during the measurement period.

Figure 2.2 identifies the existing time history for the noise levels $L_{Aeq,T}$, L_{AFmax} , $L_{A10,T}$ and $L_{A90,T}$ at **MP1** during the noise measurement survey. The night-time period is identified in orange. It can be identified from **Figure 2.2** that the $L_{Aeq,T}$ during the night-time (2300 hrs to 0700 hrs) period is approximately 4 dB lower than the daytime period between 1500 hrs and 2300 hrs on the 18th September 2025.

Figure 2.2: MP1- Noise Measurement Time History



2.3.1. Traffic Movements

An additional traffic survey was carried out by Stunt Consultancy between 15th September 2025 to 22nd September 2025 at the location provided in **Figure 2.1**. **Table 2.3** provides the night-time hourly traffic flows for Viscount Way between the 15th September 2025 and the 22nd September 2025. **Table 2.3** displays the traffic movements for the night-time period of 18th September 2025 to 19th September 2025, when the noise measurement survey was carried out. This highlights that there were a total of 11 movements between 2300 hrs and 0600 hrs, with activity increasing between 0400 hrs and 0600 hrs, and a significant increase between 0600 hrs and 0700 hrs. All these activities were related to the neighbouring property at Delivered as the appeal site is not presently operational.

Table 2.3: Night-time Hourly Traffic Flows for Viscount Way – 18.09.2025 to 19.09.2025

Date	Time Period	Westbound Total Count	Eastbound Total Count	Total
18.09.2025 to 19.09.2025	2300 hrs – 0000 hrs	0	0	0
	0000 hrs – 0100 hrs	0	0	0
	0100 hrs – 0200 hrs	0	0	0
	0200 hrs – 0300 hrs	1	0	1
	0300 hrs – 0400 hrs	0	0	0
	0400 hrs – 0500 hrs	3	1	4
	0500 hrs – 0600 hrs	3	3	6
	0600 hrs – 0700 hrs	14	7	21
Total:		21	11	32

2.4. Night-time L_{AFmax} Analysis

L_{AFmax} levels recorded during the night-time periods (2300 hrs to 0700 hrs) on 18th September 2025 to 19th September 2025 have been analysed to determine the number of L_{AFmax} events exceeding 60 dB, assessed in 5-second intervals on an hourly basis.

60 dBA L_{AFmax} has been used as the threshold for identifying existing road traffic movements from Viscount Way and industrial activities associated with 'Delivered' e.g. loading and unloading of heavy goods vehicles etc, in line with the guidance set out in the Professional Practice Guidance on Planning and Noise (ProPG). ProPG advises that internal noise levels from individual events should not exceed 45 dB L_{AFmax} in bedrooms at night in order to avoid sleep disturbance. As open windows typically provide around 15 dB attenuation, an external limit of 60 dB L_{AFmax} has therefore been adopted to ensure compliance with the recommended internal criterion.

Tables 2.4 identifies the number of existing exceedances greater than 60 dB L_{AFmax} during the night-time periods on the 18th of September 2025 which occur for more than a 5-second period.

Table 2.4: Night-time L_{AFmax} Analysis – 18.09.2025

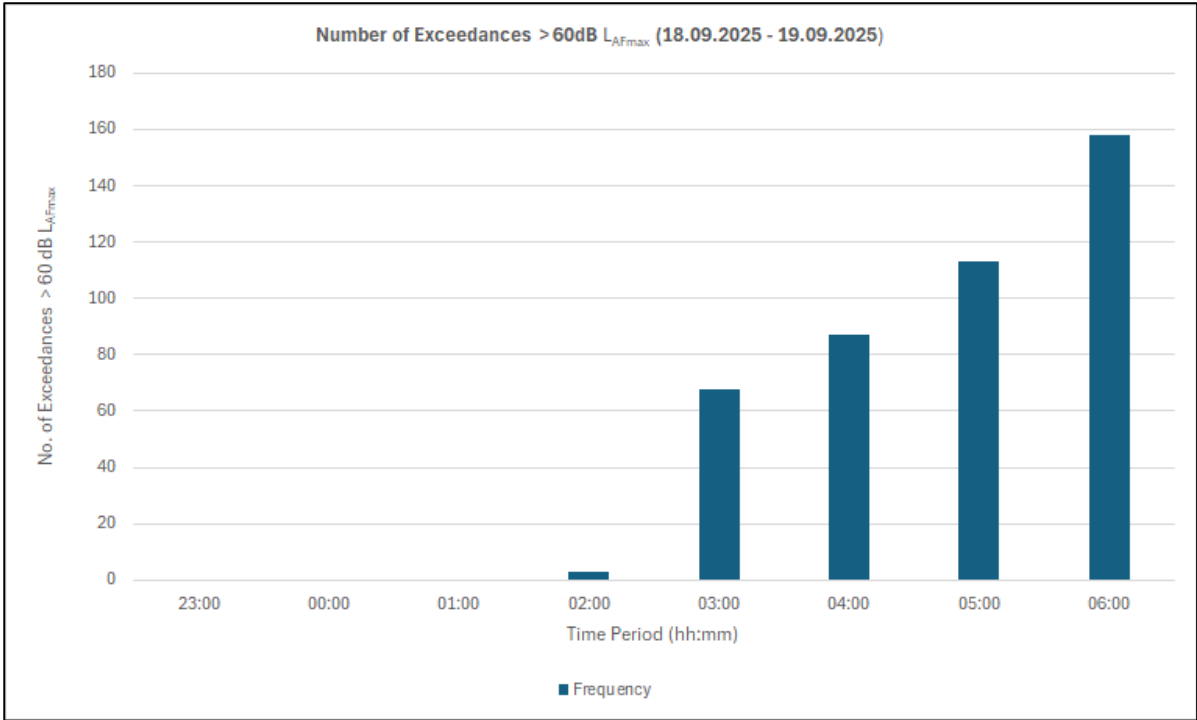
Time Period	Number of Exceedances > 60 dB $L_{AFmax,5sec}$
2300 hrs – 0000 hrs	0
0000 hrs – 0100 hrs	0
0100 hrs – 0200 hrs	0
0200 hrs – 0300 hrs	3
0300 hrs – 0400 hrs	68
0400 hrs – 0500 hrs	87
0500 hrs – 0600 hrs	113
0600 hrs – 0700 hrs	158

It can be identified from **Table 2.4** that in any one hour during the night-time period there are up to 158 $L_{AFmax,5sec}$ events that exceed 60 dB L_{AFmax} during the night-time period, indicating a high frequency of occurrence of L_{AFmax} events both related to traffic using Viscount Way and related activities associated with 'Delivered'.

The predicted night-time L_{AFmax} levels resulting from the movement of HGV's from the consented development is 32 dB L_{AFmax} for the ground floor, and 34 dB L_{AFmax} for the first and second floor at Lilly May Court as detailed in **Section 2.1**. This is significantly lower than the 60dB L_{AFmax} accepted as causing sleep disturbance, therefore identifying that the predicted use of Unit 10 and the associated noise levels will not result in an adverse noise impact. The comparison between the existing peak noise levels and the predicted peak noise levels with no restriction on the hours of use of Units 9 & 10 demonstrates that noise from the development will not be considered intrusive or annoying at Lilly May Court, given the regular occurrence of louder L_{AFmax} events from Viscount Way and related activity from the 'Delivered' warehouse during the night-time period. Even if the 'Delivered' activity was not prevalent, the predicted noise levels are considerably lower than those acceptable levels that would otherwise result in sleep disturbance.

Figure 2.3 presents a histogram showing the number of exceedances above 60 dB L_{AFmax} per hour during the night-time period.

Figure 2.3: Night-time Exceedances > 60 dB L_{AFmax}



3. CONCLUSIONS

Additional noise monitoring has been carried out at Headley Road East, Woodley, to support the proposal to remove Condition 32 of Planning Application Reference: 25083, Appeal Reference: APP/XO360/W/22/3306963 through Section 73 of the Town and Country Planning Act, 1990.

The night-time L_{AFmax} analysis presented in **Section 2.4** identifies up to 158 existing peak noise events ($L_{AFmax,5sec}$) in any one hour exceeding 60 dB L_{AFmax} across the night-time monitoring period, all identified as in relation to the existing 'Delivered' operations on the adjacent site.

The predicted night-time noise levels from the consented development indicates that the peak noise events from delivery vehicles serving Unit 10 would be significantly less than 60 dB L_{AFmax} (32 dB L_{AFmax} at ground floor level at Lilly May Court, and 34 dB L_{AFmax} at first and second floor levels). This would not result in any additional disturbance above the already existing high frequency of occurrence of existing peak noise events exceeding the 60dB L_{AFmax} during the night-time period associated with the neighbouring 'Delivered' site operations which have no restrictions. As such, the predicted noise levels for Unit 10 identify that there will be no intrusive or annoying peak noise events during the night time period to those residents inf nearby residential properties. It is therefore my consideration that Condition 32 is unnecessary and unreasonable, and its removal would not have an adverse impact on the nearest noise-sensitive receptors at Lilly May Court.

APPENDICES

Appendix 1 **Technical Note (Dated 28.06.2024)**

TECHNICAL NOTE IN RESPECT OF THE PROPOSAL TO VARY THE PLANNING CONDITION (REF 213106) AT HEADLEY ROAD EAST, WOODLEY

Introduction

ACCON UK Ltd (ACCON) have been commissioned by HE2 Reading 1 GP Limited to investigate the potential noise impacts on the nearest noise sensitive receptors (NSRs) to the site of extending the consented operational delivery hours for Units 9 and 10 at Headley Road East, Woodley, RG5 4SN.

The client seeks to remove Condition 32 through Section 73 of the Town and Country Planning Act, 1990. The proposal is to extend the permitted hours of deliveries such that deliveries can be accepted or dispatched from Units 9 and 10 throughout the night-time period (2300 hrs to 0700 hrs).

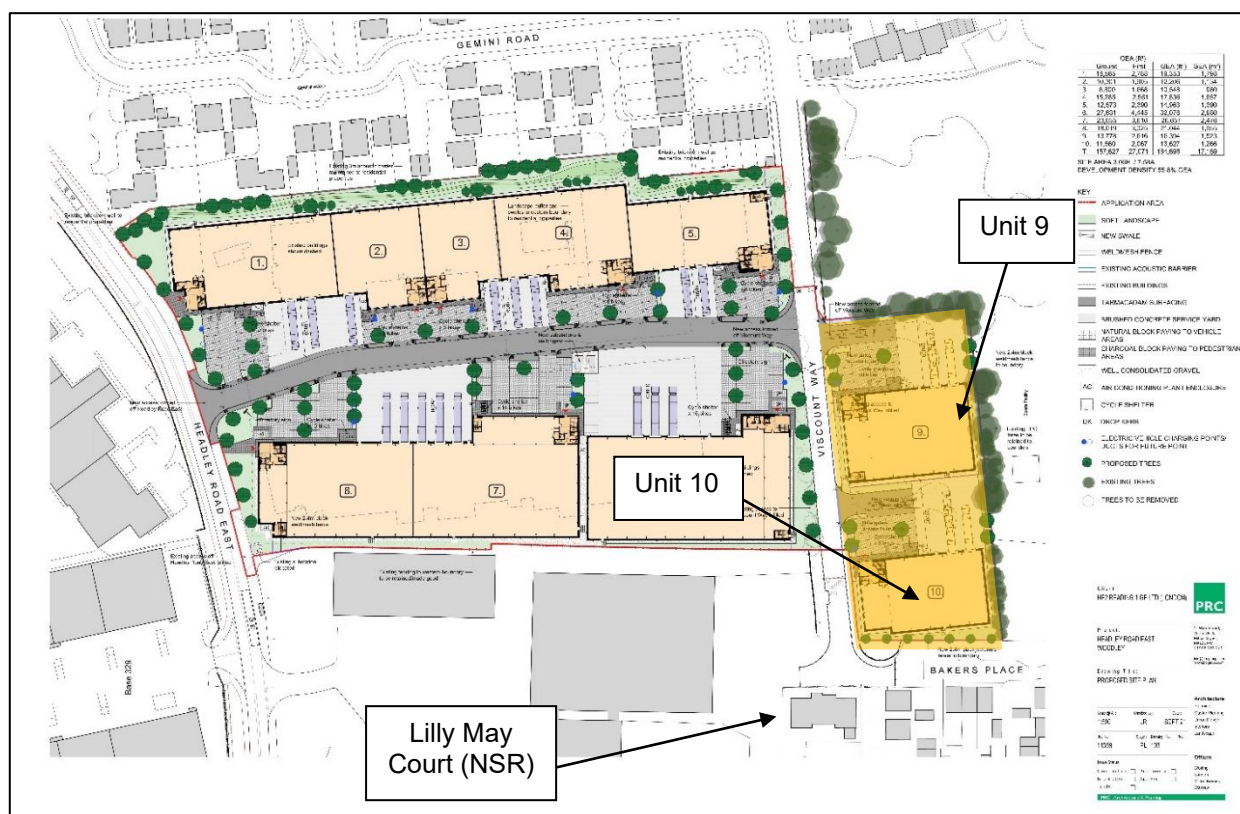
The Planning Condition (Condition 32)

Condition 32 (Planning Reference: 213106, Appeal Reference: APP/XO360/W/22/3306963) relates to the permitted hours for deliveries and is provided below:

“No deliveries shall be accepted or dispatched from Units 9 and 10 between 2300hrs and 0700hrs the following day”.

The consented plan including Units 9 and 10 (highlighted in orange) is identified in **Figure 1**. The nearest Noise Sensitive Receptor (NSR), located at Lilly May Court, is also identified.

Figure 1: Proposed Site Plan



Planning Policy & Guidance

National Planning Policy Framework

The revised National Planning Policy Framework (NPPF as amended in December 2023) supersedes the 2012, 2018, 2019 and 2021 versions of the NPPF. The purpose of the planning system is to contribute to the achievement of sustainable development. There are three dimensions to sustainable development: economic, social and environmental. The environmental role is to contribute to protecting and enhancing our natural, built and historic environment; and as part of this, make effective use of land, help to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate to adapt to climate change including moving to a low carbon economy.

One of the core planning principles is to contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser value, where consistent with other policies in the Framework. The planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.

Paragraph 191 of the NPPF states:

“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life (see Explanatory Note to the Noise Policy Statement for England (Department for Environment, Food and Rural Affairs, 2010));*
- b) Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.”*

Additionally, Paragraph 193 states:

“Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”

Noise Policy Statement for England

The Noise Policy Statement for England (NPSE) aims to *“through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:*

- Avoid significant adverse impacts on health and quality of life;*
- Mitigate and minimise adverse impacts on health and quality of life; and*
- Where possible, contribute to the improvement of health and quality of life”.*

Based on concepts from toxicology, it introduces three ‘Effect Levels’ relevant to the assessment of noise. These are:

- NOEL: No Observed Effect Level: This is the level below which no effect can be detected. In simple terms, below this level, there is no detectable effect on health and quality of life due to the noise;*
- LOAEL: Lowest Observed Adverse Effect Level: This is the level above which adverse effects on health and quality of life can be detected; and*
- SOAEL: Significant Observed Adverse Effect Level: This is the level above which significant adverse effects on health and quality of life occur.*

Planning Practice Guidance

The Planning Practice Guidance for Noise (PPG-N) was published in March 2014 and most recently updated in July 2019. The PPG-N suggests that the most appropriate and cost-effective solutions to potential noise issues are best identified when good acoustic design is considered early in the planning process.

The PPG-N provides the following advice on how to determine the noise impact on development:

“Plan-making and decision making need to take account of the acoustic environment and in doing so consider:

- *Whether or not a significant adverse effect is occurring or likely to occur;*
- *Whether or not an adverse effect is occurring or likely to occur; and*
- *Whether or not a good standard of amenity can be achieved.*

In line with the Explanatory Note of the Noise Policy Statement for England, this would include identifying whether the overall effect of the noise exposure (including the impact during the construction phase wherever applicable) is, or would be, above or below the significant observed adverse effect level and the lowest observed adverse effect level for the given situation. As noise is a complex technical issue, it may be appropriate to seek experienced specialist assistance when applying this policy.” (Paragraph 003 Reference ID 30-003-20190722)

The document goes on to acknowledge the levels of noise exposure at which an effect may occur as provided in the NPSE and introduces a fourth effect level:

- UAE: Unacceptable Adverse Effect: Extensive and regular changes in behaviour and/or an inability to mitigate the effect of noise lead to psychological stress or physical effects.

Where residential development is proposed in the vicinity of existing businesses, community facilities or other activities that produce noise, the PPG-N advises that the applicant (or ‘agent of change’) need to clearly identify the effects of the existing businesses that may cause a nuisance (including noise) and clearly define the mitigation measures being proposed to address any potential significant adverse effects that are identified. The agent of change needs to not only consider the current activities of the business, but the permitted activities too, even if they are not occurring at the time of the application being made. The PPG-N acknowledges that *“It can be helpful for developers to provide information to prospective purchasers or occupants about mitigation measures that have been put in place, to raise awareness and reduce the risk of post-purchase/occupancy complaints.”* (Paragraph 009 Reference ID 30-009-20190722).

It is important to understand that as the PPG-N does not specifically provide any advice with respect to noise levels/limits for different sources of noise, it is appropriate to consider other sources of advice and guidance documents when considering whether new developments would be sensitive to the prevailing acoustic environment and the PPG-N signposts a number of appropriate guidance documents.

Synopsis of Previous Noise Study & Predicted Noise Levels

ACCON has previously conducted both attended and unattended noise monitoring at the Headley Road East, Woodley site. The noise monitoring locations are identified in **Table 1**. The noise measurement results from ACCON's previous Noise Impact Assessment (Reference A4199/N/0003) that was carried out between 1115 hrs on Wednesday 17th March 2021 and 1200hrs Thursday 18th March 2021 are detailed in **Tables 1, 2 and 3**.

Table 1: Noise Survey Locations (17.03.2021 – 18.03.2021)

Location Reference	Location Description	Measurement Duration	Observed Noise Sources
MP1	In the south of the site, approximately 35 m south of Viscount Way.	24 Hours.	Departing HGVs from the site and road traffic along Viscount Way.
MP2	In the north east of the site, approximately 16 m to the south of Headley Road East.	24 Hours.	Headley Road East is the dominant road traffic noise source.
ST1	In the west of the site, approximately 40 m to the south of the access road entrance.	2 x 1 Hour Periods.	Plant sources along the west façade of the existing building are the dominant noise source. Regular movement of HGVs along the access road.
ST2	In the south east of the site, approximately 5 m north of Viscount Way and approximately 40 m to the west of the service yard.	2 x 1 Hour Periods.	Unloading of the HGVs can be heard with road traffic noise along Viscount Way.

Table 2: Unattended Noise Measurement Survey (17.03.2021 – 18.03.2021)

Position	Period	L _{Aeq,T} (dB)	L _{AFmax} (dB)	L _{A10,T} (dB)	Mean L _{A90,T} (dB)	Modal L _{A90,T} (dB)	Typical L _{A90,T}
MP1	0700 hrs to 2300 hrs	54	72 (72)	53	45	43	40
	0700 hrs to 2300 hrs	49	66 (67)	49	39	35	35
MP2	0700 hrs to 2300 hrs	61	77 (77)	64	50	51	51

Position	Period	L _{Aeq,T} (dB)	L _{AFmax} (dB)	L _{A10,T} (dB)	Mean L _{A90,T} (dB)	Modal L _{A90,T} (dB)	Typical L _{A90,T}
	0700 hrs to 2300 hrs	54	74 (72)	51	42	40	40

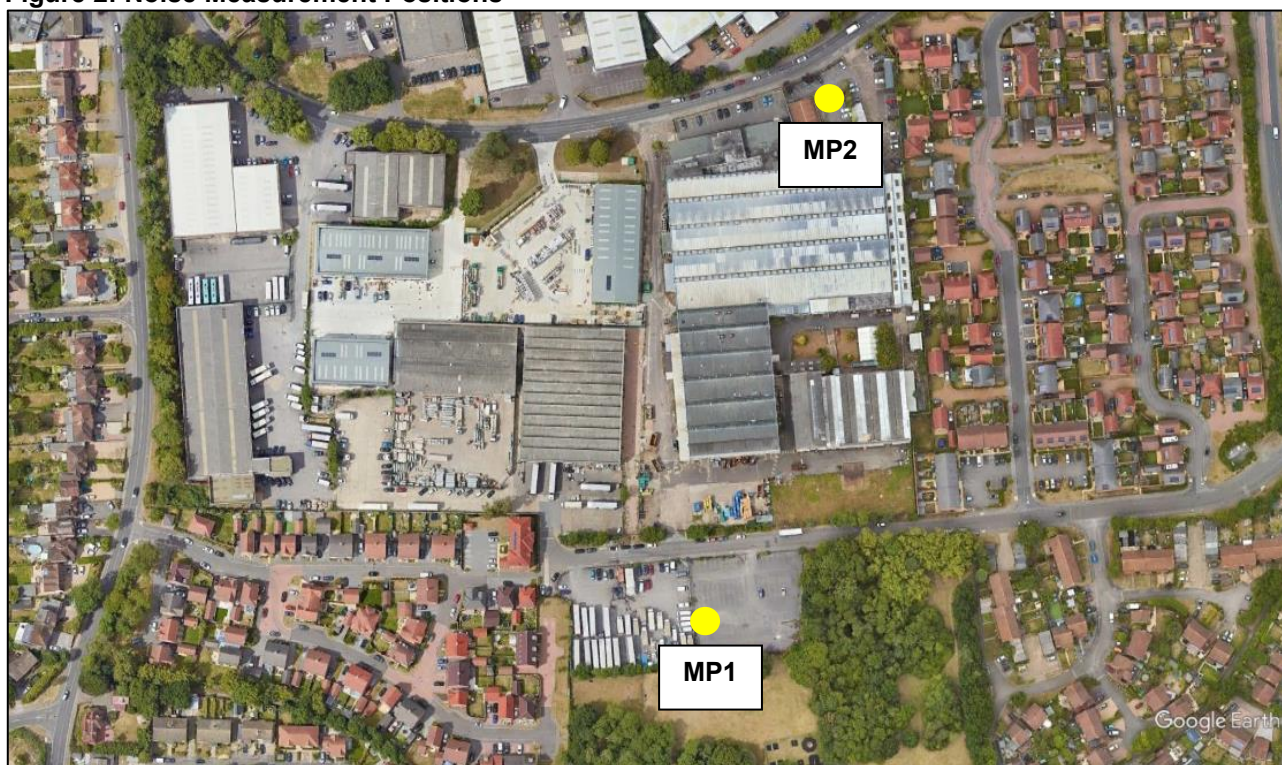
Table 3: Attended Noise Measurement Survey (17.03.2021 – 18.03.2021)

Position	Period	L _{Aeq,T} (dB)	L _{AFmax} (dB)	Mean L _{A10,T} (dB)	Mean L _{A90,T} (dB)
ST1	1210 hrs to 1310 hrs	64	71	64	63
	0950 hrs to 1050 hrs	63	68	64	62
ST2	1310 hrs to 1410 hrs	54	71	53	41
	1050 hrs to 1150 hrs	55	73	53	42

The levels stated are logarithmic averages for L_{Aeq,T} and arithmetic averages for L_{A10,T} and mean L_{A90,T}. The L_{AFmax} is the average of the highest hourly maximum sound levels measured during the measurement period, measured with a fast time-weighting. The L_{AFmax} levels in brackets are the tenth highest L_{AFmax} noise levels measured during the measurement period. The typical background sound level has been determined from assessment of the lowest regularly occurring L_{A90,T}.

Figure 2 identifies the noise measurement positions.

Figure 2: Noise Measurement Positions



A Technical Note (dated 15/02/2022) was issued which updated the predicted noise levels for Lilly May Court and Concorde Way arising from deliveries. The predicted daytime and night-time period noise levels from that report are identified in **Table 4**.

Table 4: Delivery Noise Levels Predicted at NSRs: $L_{Aeq,T}$

NSR	Specific Delivery Noise Level ($L_{Aeq,T}$ dB)	
	Daytime	Night-time
Lilly May Court: Ground Floor	33	32
Lilly May Court: First Floor	34	34
Lilly May Court: Second Floor	34	34
22 – 34 Concorde Way: Ground Floor	37	28
22 – 34 Concorde Way: First Floor	40	29

Recent Noise Measurement Survey

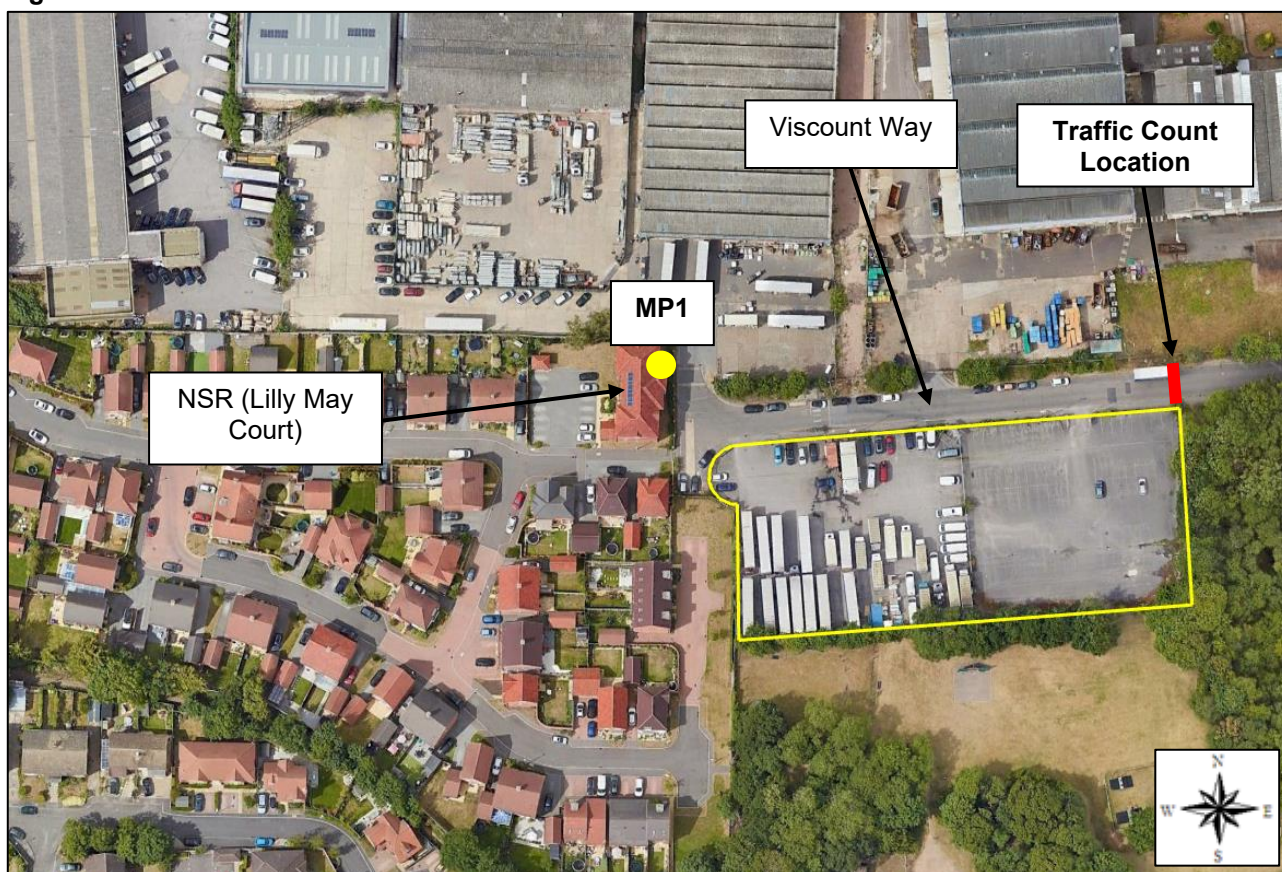
In order to quantify existing noise levels at Lilly May Court, a 24 hour noise measurement study was carried out in May 2024. At the same time as the noise measurement study was carried out, automatic traffic counts were carried out at Viscount Way between the 26th April 2024 and the 14th May 2024 at the location identified on **Figure 2**.

Unattended noise measurements were carried out between 1125 hrs on the 7th May 2024 and 1145 hrs on the 8th May 2024 to determine the existing ambient and background noise levels during the proposed extended operational hours.

The noise measurements utilised one Class 1 Sound Level Meter: a Svantek 971 sound level meter, which holds a current certificate of calibration that is available upon request. The equipment was calibrated before and after the noise measurement period to ensure that it had remained within calibration limits (± 0.5 dB).

The microphone was located at Lilly May Court in a free-field position at a height of 4.5 metres. The measurement position (**MP1**) is identified in **Figure 3**. The consented boundary for Units 9 and 10 is outlined in yellow.

Figure 3: Noise Measurement Position



At the start of the noise measurements the weather was clear with 0% cloud cover. The daytime temperature was 18°C and there was a westerly wind with speeds of up to 1.3 m/s. At the end of the noise measurement period the weather was clear with 0% cloud cover.

There was a daytime temperature of 19°C and there was a south-westerly wind with speeds of up to 1.1 m/s. Weather conditions throughout the survey were suitable for noise measurements.

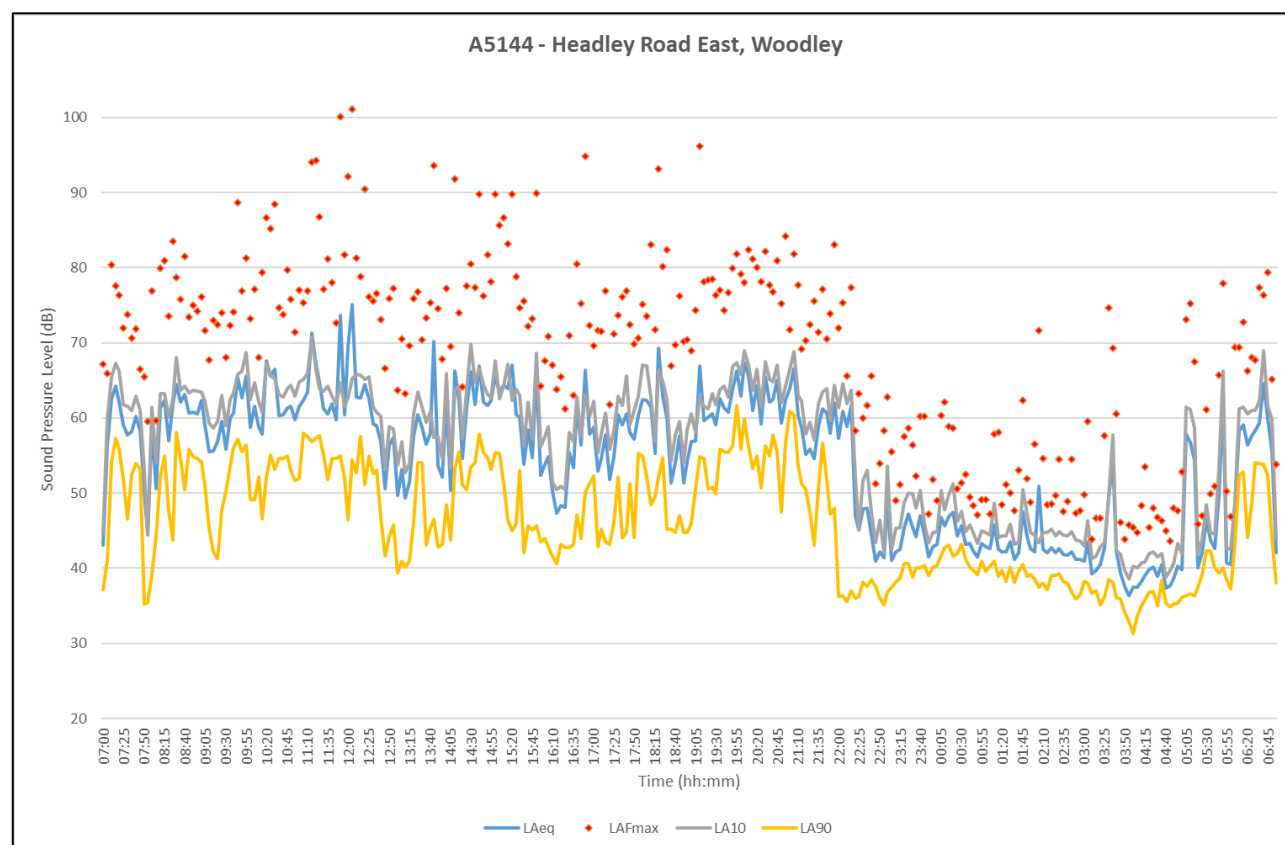
The unattended noise levels are summarised in **Table 5**. The noise level summary identifies the average period noise level during the measurement period (L_{Aeq}), the measured maximum noise level (L_{Amax}) and importantly the background noise level (L_{A90}) which is the underlying noise level between specific noise events.

Table 4: Noise Measurement Results

Position	Period	$L_{Aeq,T}$ (dB)	L_{AFmax} (dB)	$L_{A10,T}$ (dB)	Mean $L_{A90,T}$ (dB)	Modal $L_{A90,T}$ (dB)
MP1	0700 hrs to 2300 hrs	62	89	63	51	55
	2300 hrs to 0700 hrs	52	68 (69)	47	40	39

The time history graph for the noise measurements at **MP1** is provided in **Figure 4**.

Figure 4: MP1 Time History



Traffic Movements

Table 6 below provides the night-time hourly traffic flows for Viscount Way between the 26th April 2024 and the 13th May 2024. The traffic count data was provided by Simone Surveys.

Table 6: Night-time hourly traffic flows for Viscount Way

Date	Time Period	Westbound Total Count	Eastbound Total Count
Friday 26 th April 2024 – Saturday 27 th April 2024	2300 hrs – 0700 hrs	7	5
Saturday 27 th April 2024 – Sunday 28 th April 2024	2300 hrs – 0700 hrs	1	1
Sunday 28 th April 2024 – Monday 29 th April 2024	2300 hrs – 0700 hrs	26	14
Monday 29 th April 2024 – Tuesday 30 th April 2024	2300 hrs – 0700 hrs	28	16
Tuesday 30 th April 2024 – Wednesday 1 st May 2024	2300 hrs – 0700 hrs	30	20
Wednesday 1 st May 2024 – Thursday 2 nd May 2024	2300 hrs – 0700 hrs	23	16
Thursday 2 nd May 2024 – Friday 3 rd May 2024	2300 hrs – 0700 hrs	27	19
Friday 3 rd May 2024 - Saturday 4 th May 2024	2300 hrs – 0700 hrs	10	6
Saturday 4 th May 2024 – Sunday 5 th May 2024	2300 hrs – 0700 hrs	0	0
Sunday 5 th May 2024 – Monday 6 th May 2024 (Bank Holiday)	2300 hrs – 0700 hrs	3	3
Monday 6 th May 2024 – Tuesday 7 th May 2024	2300 hrs – 0700 hrs	24	12
Tuesday 7 th May 2024 – Wednesday 8 th May 2024	2300 hrs – 0700 hrs	29	20
Wednesday 8 th May 2024 – Thursday 9 th May 2024	2300 hrs – 0700 hrs	23	16
Thursday 9 th May 2024 – Friday 10 th May 2024	2300 hrs – 0700 hrs	23	11

Date	Time Period	Westbound Total Count	Eastbound Total Count
Friday 10 th May 2024 – Saturday 11 th May 2024	2300 hrs – 0700 hrs	8	6
Saturday 11 th May 2024 – Sunday 12 th May 2024	2300 hrs – 0700 hrs	8	6
Sunday 12 th May 2024 – Monday 13 th May 2024	2300 hrs – 0700 hrs	26	12
Monday 13 th May 2024 – Tuesday 14 th May 2024	2300 hrs – 0700 hrs	24	13

It can be identified from the traffic counts that on weekdays the two way traffic movements are between 34 to 50 vehicle movements apart from on the Bank Holiday Monday on the 6th May 2024.

Noise Modelling

The CadnaA noise modelling software has been utilised to calculate the external noise levels from road traffic movements and the consented development.

Table 7 identifies the predicted period noise levels (L_{Aeq}) from night-time delivery noise in respect of the property at Lilly May Court at ground floor level (representative of the closest noise sensitive receptors). **Table 8** identifies the predicted noise levels at first floor level and **Table 9** at second floor level.

Table 7: Predicted Period Noise Levels ($L_{Aeq,15mins}$) from Delivery Noise compared to the Measured Night-time Background Sound Levels (L_{A90}) – Lilly May Court: Ground Floor

Time	Lilly May Court: Ground Floor		
	Measured Background Sound Level L_{A90}	Predicted Night-time Delivery Noise Levels (L_{Aeq})	Difference between the Predicted Night-time Period Noise Levels and Measured Background Sound Levels (dB)
2300 hrs to 0000 hrs	39	32	-7
0000 hrs to 0100 hrs	41	32	-9
0100 hrs to 0200 hrs	40	32	-8
0200 hrs to 0300 hrs	38	32	-6

Time	Lilly May Court: Ground Floor		
	Measured Background Sound Level L_{A90}	Predicted Night-time Delivery Noise Levels (L_{Aeq})	Difference between the Predicted Night-time Period Noise Levels and Measured Background Sound Levels (dB)
0300 hrs to 0400 hrs	36	32	-4
0400 hrs to 0500 hrs	35	32	-3
0500 hrs to 0600 hrs	39	32	-7
0600 hrs to 0700 hrs	48	32	-16

Table 8: Predicted Period Noise Levels ($L_{Aeq,15mins}$) from Delivery Noise compared to the Measured Night-time Background Sound Levels (L_{A90}) – Lilly May Court: First Floor

Time	Lilly May Court: First Floor		
	Measured Background Sound Level L_{A90}	Predicted Night-time Delivery Noise Levels (L_{Aeq})	Difference between the Predicted Night-time Period Noise Levels and Measured Background Sound Levels (dB)
2300 hrs to 0000 hrs	39	34	-5
0000 hrs to 0100 hrs	41	34	-7
0100 hrs to 0200 hrs	40	34	-6
0200 hrs to 0300 hrs	38	34	-4
0300 hrs to 0400 hrs	36	34	-2
0400 hrs to 0500 hrs	35	34	-1
0500 hrs to 0600 hrs	39	34	-5
0600 hrs to 0700 hrs	48	34	-14

Table 9: Predicted Period Noise Levels ($L_{Aeq,15mins}$) from Delivery Noise compared to the Measured Night-time Background Sound Levels (L_{A90}) – Lilly May Court: Second Floor

Time	Lilly May Court: Second Floor		
	Measured Background Sound Level L_{A90}	Predicted Night-time Delivery Noise Levels (L_{Aeq})	Difference between the Predicted Night-time Period Noise Levels and Measured Background Sound Levels (dB)
2300 hrs to 0000 hrs	39	34	-5
0000 hrs to 0100 hrs	41	34	-7
0100 hrs to 0200 hrs	40	34	-6
0200 hrs to 0300 hrs	38	34	-4
0300 hrs to 0400 hrs	36	34	-2
0400 hrs to 0500 hrs	35	34	-1
0500 hrs to 0600 hrs	39	34	-5
0600 hrs to 0700 hrs	48	34	-14

Tables 7 to 9 demonstrate that the predicted noise levels from delivery noise associated with Units 9 and 10 would be below the measured existing background noise level at Lilly May Court during the night-time period. As a very worst-case noise from delivery movements would be 1 dB below the background noise level of 35 L_{A90} measured between 0400 hrs to 0500 hrs and 19 dB below the existing measured period noise level of 52 L_{Aeq} . It should also be noted that Viscount Way is currently used by a relatively high number of HGVs during the night-time period not associated with the application site but the adjacent site only (as identified in **Table 6**). Units 9 and 10 will not be introducing new noise in the vicinity of the existing residential properties surrounding the consented development as all HGV movements associated with the application site are being directed from Headley Road East through the main site onto the very short section of Viscount Way in front of Units 9 and 10.

Additionally, internal noise levels within bedrooms at night, assuming an open window provides a minimum attenuation of 15 dB, would be a maximum level of 18 L_{Aeq} from delivery noise. This level of noise is significantly below World Health Organisation Guidelines for Noise for bedrooms at night.

Conclusions

ACCON has assessed the potential impacts of the proposal to remove Planning Condition 32 at Headley Road East, Woodley such that deliveries can be accepted or dispatched from Units 9 and 10 throughout the night-time period (2300 hrs to 0700 hrs). It has been identified that even with additional HGV movements, there is No Observed Adverse Effect Level in line with the Noise Policy Statement for England and therefore, Planning Condition 32 can be removed.

Graham Parry FIOA

Managing Director

ACCON UK Limited

Appendix 2 **Technical Note (Dated 05.09.2024)**

TECHNICAL NOTE RESPONDING TO COMMENTS RAISED BY WOKINGHAM BOROUGH COUNCIL ENVIRONMENTAL HEALTH IN RESPECT TO THE PROPOSAL TO REMOVE CONDITION 32 (REF 241926) AT HEADLEY ROAD EAST, WOODLEY

The purpose of this Technical Note is to respond to comments raised by Wokingham Borough Council Environmental Health in response to the proposal to remove Condition 32 of Appeal Reference: APP/X0360/W/22/3306963, dated 22nd December 2023, through Section 73 of the Town and Country Planning Act, 1990. The proposal is to remove the restriction on the permitted hours of deliveries such that deliveries can be accepted or dispatched from Units 9 and 10 throughout the night-time period (2300 hrs to 0700 hrs). The comments received as detailed in a memorandum dated 8/8/2024 and corresponding ACCON responses are detailed below:

1) Why was the noise assessment provided not in a BS4142 format separate from previous submissions.

The Technical Note was not originally provided as a BS 4142 type assessment as it was considered that the details as presented were the most useful information with respect to the delivery activities between 2300 hrs and 0700 hrs. The information required for a BS 4142 assessment is now provided in this revised Technical Note.

Tables 1 to 3 below provide BS 4142 assessments for the ground, first and second floor levels of Lilly May Court. As an absolute worst-case scenario, an intermittency correction of +3 dB has been applied, plus a correction of +3 dB for just perceptible impulsivity. This is a total correction of +6 dB which has been added to the predicted delivery noise levels.

The night-time assessment has utilised each hourly background noise level (L_{A90}) instead of the modal background noise for the period 2300 hrs – 0700 hrs, which is 39 dB $L_{A90,T}$. Accordingly, this assessment is a very worst case scenario.

Table 1: Predicted Period Noise Levels (L_{Aeq}) from Delivery Noise compared to the Measured Night-time Background Sound Levels (L_{A90}) – Lilly May Court: Ground Floor

Time	Lilly May Court: Ground Floor				
	Measured Background Sound Level L_{A90}	Predicted Night-time Delivery Noise Levels (L_{Aeq})	Corrections for Intermittency and Impulsivity	Rating Noise Level	Difference between the Rating Noise Level and Measured Background Sound Level (dB)
23:00 – 00:00	39	32	+6	38	-1
00:00 – 01:00	41	32	+6	38	-3

01:00 – 02:00	40	32	+6	38	-2
02:00 – 03:00	38	32	+6	38	0
03:00 – 04:00	36	32	+6	38	+2
04:00 – 05:00	35	32	+6	38	+3
05:00 – 06:00	39	32	+6	38	-1
06:00 – 07:00	48	32	+6	38	-10

Table 2: Predicted Period Noise Levels (L_{Aeq}) from Delivery Noise compared to the Measured Night-time Background Sound Levels (L_{A90}) – Lilly May Court: First Floor

Time	Lilly May Court: First Floor				
	Measured Background Sound Level L_{A90}	Predicted Night-time Delivery Noise Levels (L_{Aeq})	Corrections for Intermittency and Impulsivity	Rating Noise Level	Difference between the Rating Noise Level and Measured Background Sound Level (dB)
23:00 – 00:00	39	34	+6	40	+1
00:00 – 01:00	41	34	+6	40	-1
01:00 – 02:00	40	34	+6	40	0
02:00 – 03:00	38	34	+6	40	+2
03:00 – 04:00	36	34	+6	40	+4
04:00 – 05:00	35	34	+6	40	+5
05:00 – 06:00	39	34	+6	40	+1
06:00 – 07:00	48	34	+6	40	-8

Table 3: Predicted Period Noise Levels (L_{Aeq}) from Delivery Noise compared to the Measured Night-time Background Sound Levels (L_{A90}) – Lilly May Court: Second Floor

Time	Lilly May Court: Second Floor				
	Measured Background Sound Level L_{A90}	Predicted Night-time Delivery Noise Levels (L_{Aeq})	Corrections for Intermittency and Impulsivity	Rating Noise Level	Difference between the Rating Noise Level and Measured Background Sound Level (dB)
23:00 – 00:00	39	34	+6	40	+1
00:00 – 01:00	41	34	+6	40	-1
01:00 – 02:00	40	34	+6	40	0
02:00 – 03:00	38	34	+6	40	+2
03:00 – 04:00	36	34	+6	40	+4
04:00 – 05:00	35	34	+6	40	+5
05:00 – 06:00	39	34	+6	40	+1
06:00 – 07:00	48	34	+6	40	-8

Whilst BS 4142:2014+A1 indicates that a difference of approximately +5 dB between the background noise level and the rating noise level is likely to suggest an adverse impact, depending on the context, Annex 2, Para 14, Page 117 of the Managing Development Delivery (MDD) Local Plan, adopted by Wokingham Borough Council on February 21st 2014, states that "*If the predicted impact of the development is 5 dB above background, it would be considered to be the LOEL.*". Considering that the worst-case scenario in **Tables 1 to 3** demonstrates a maximum 4 - 5 dB increase above the background noise level between 0300 hrs and 0500 hrs for both the first floor and second floor, this can be classified as a LOEL (Lowest Observed Adverse Effect Level). It should be noted however that if the assessment was applied only to the night-time period (2300 hrs – 0700 hrs), in line with the standard BS4142 approach, then the assessment would identify that the Rating Noise Level would only exceed the background noise level by +1 dBA.

2) Key in advising planning is how much additional traffic is expected as a result of this change to condition 32 and 24 hr operation of units 9 and 10, could this predicted data be provided please, including vehicle type.

Following a review of the traffic data provided by Stunt Consulting, ACCON note that the traffic data was not provided with the degree of granularity to determine the delivery movements that would have occurred to Units 9 & 10 during the night-time period. ACCON have therefore taken a very worst-case scenario into account where the acceptance and despatch of deliveries would occur to each loading bay on Units 9 & 10 every 15 minutes during the night-time period. In reality it is clear that such a level of operation is highly unlikely based on ACCON's observations of loading and unloading at similar facilities. The noise assessment therefore considered a rate of 2 HGV vehicle movements per 15 minutes during the night-time period (2300 hrs – 0700 hrs) for both Units 9 and 10, which represents an absolute worst-case scenario for HGV movements.

It should be noted that HGV's arriving at and departing Units 9 & 10 during the night-time period would cross Viscount Way to/and from Units 1 to 8 during the period 2300 hrs to 0700 hrs and would be prohibited from arriving or exiting along Viscount Way to or from the east.

3) The NSR (nearest sensitive receptor) for noise for unit 10 is shown as Lilly May Court, there are some other residential properties also in close proximity to the expected loading area for unit 10 along Bakers Place, are these considered to be shielded from loading unloading noise by the fabric of the building? In which case can a drawing clearly defining this and showing the expected loading unloading area(s) be presented and the reasoning shown in the report.

Figures 1 and 2 illustrates screenshots from the CadnaA Noise modelling software that depict Bakers Place in relation to Units 9 and 10, and the Loading/Unloading areas.

Figure 1: CadnaA Screenshot (Facing North from a 5m Height)

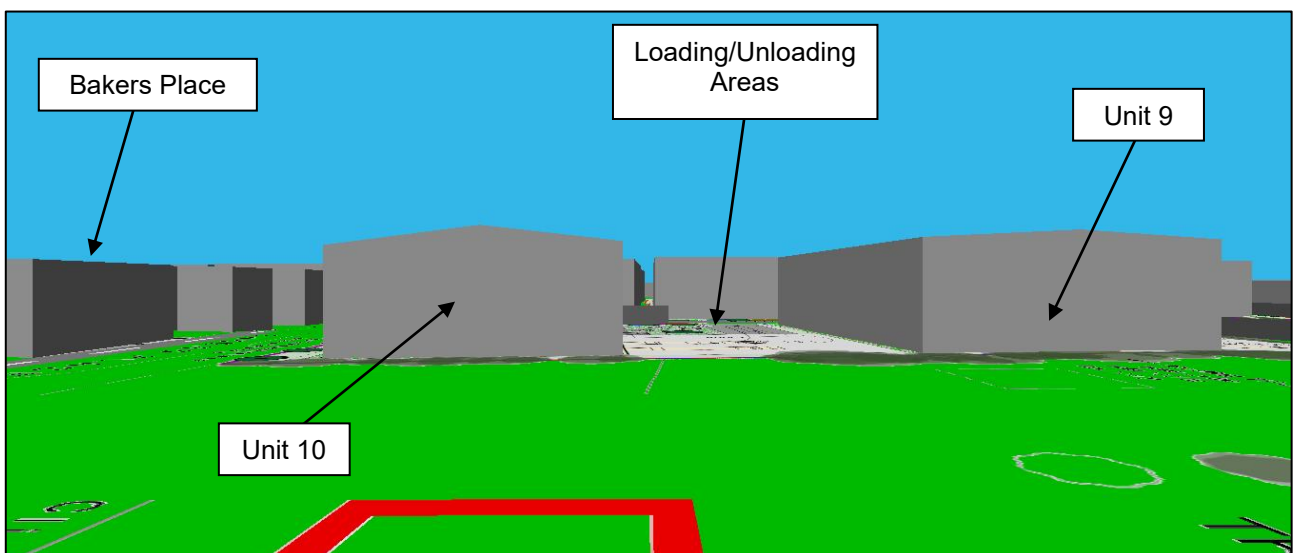
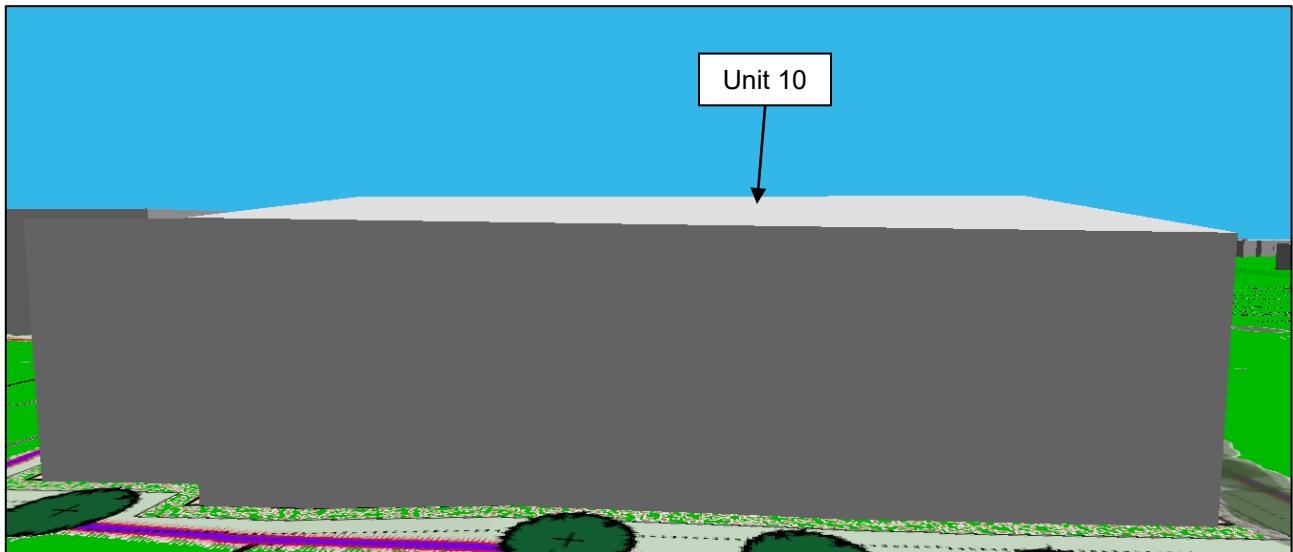


Figure 2: View from 2nd Floor (8.0m) of 23 Bakers Place facing eastwards



Figures 1 and 2 illustrate that Bakers Place lacks a direct line of sight to the loading and unloading areas, which are located approximately 50 metres from the eastern façade of Bakers Place. Additionally, the proposed Unit 10 has a ridge height of 11.2 metres and will extend approximately 3.2 metres above the second floor of Bakers Place. This will effectively act as a significant noise barrier, mitigating against any noise emanating from the loading and unloading bays.

4) Is there any plant involved in this proposal to change operating hours for units 9 and 10 that is not currently running at night, this would be inclusively assessed in a BS4142 assessment.

Figure 3 below identifies the location of the air conditioning unit, highlighted in Red, relative to Unit 10, and the NSRs at Lilly May Court and Bakers Place. This air conditioning unit is the only proposed plant that will be running during the night-time period (2300 hrs – 0700 hrs). The corresponding heights of the air conditioning unit, Unit 10, and the NSRs are also identified.

Figure 3: Location of Air Conditioning Unit

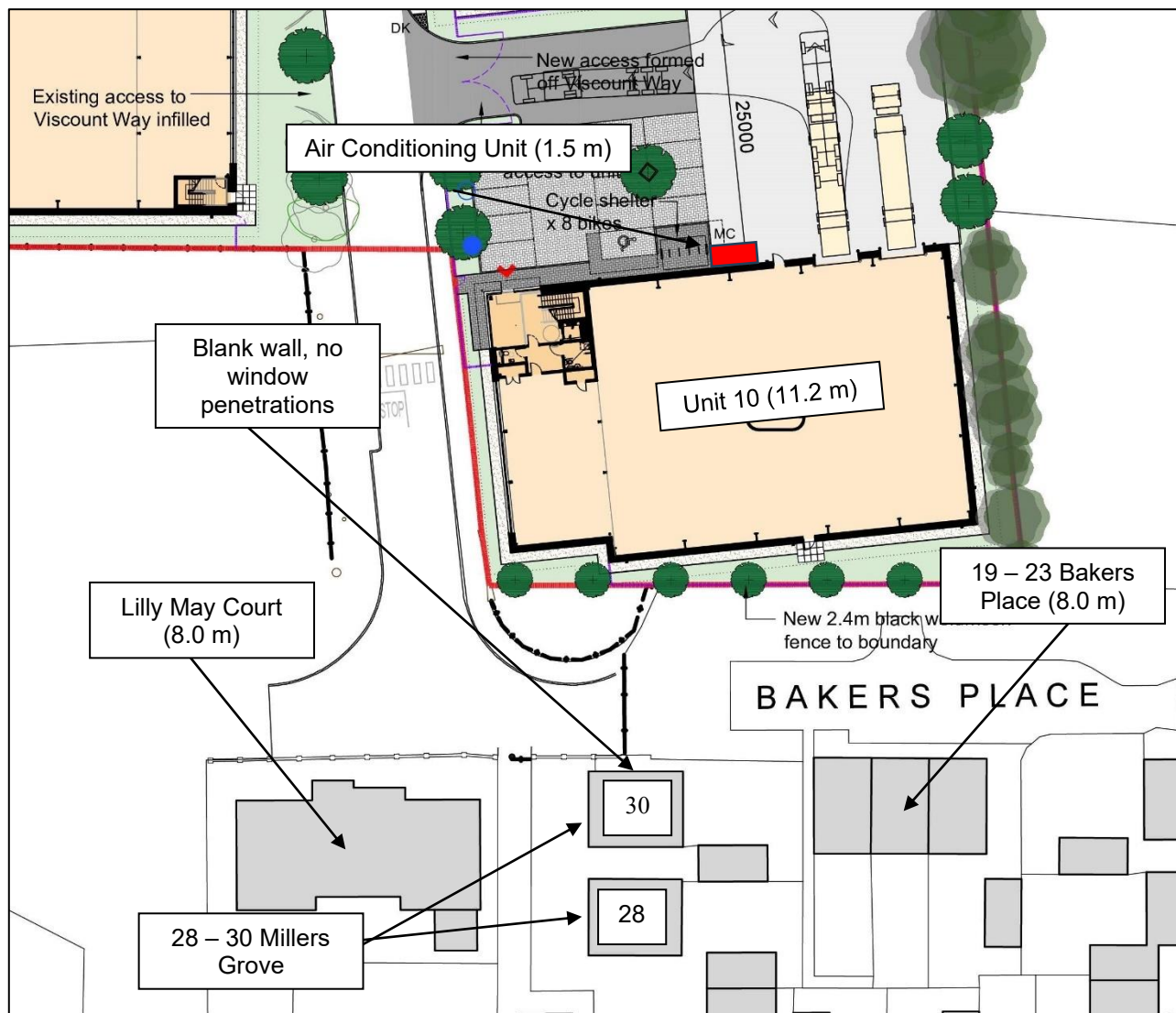


Figure 3 demonstrates that Unit 10 provides significant shielding, ensuring that the air conditioning units operation has no noise impact on the NSRs at Lilly May Court, Bakers Place and Millers Grove. This is due to there being no direct line of sight between either any NSR and the air conditioning unit. Therefore, the air conditioning unit will have no adverse noise impact on the NSRs at Lilly May Court, Bakers Place and Millers Grove.

Graham Parry FIOA
Managing Director
ACCON UK Limited

Appendix 3

Glossary of Acoustic Terminology

Term	Description
'A'-Weighting	This is the main way of adjusting measured sound pressure levels to take into account human hearing, and our uneven frequency response.
Decibel (dB)	This is a tenth (deci) of a bel. A decibel can be a measure of the magnitude of sound, changes in sound level and a measure of sound insulation. Decibels are not an absolute unit of measurement but are an expression of ratio between two quantities expressed in logarithmic form.
Ambient /Period Sound Level, $L_{Aeq, T}$	The equivalent steady sound level in dB containing the same acoustic energy as the actual fluctuating sound level over the given period, T. T may be as short as 1 second when used to describe a single event, or as long as 24 hours when used to describe the noise climate at a specified location. $L_{Aeq, T}$ can be measured directly with an integrating sound level meter.
Maximum Sound Level, $L_{Amax, F}$	The maximum sound pressure level during a measurement period or a noise event measured with 'A'-Weighting and Fast (F) time constant.
Background Sound Level, $L_{A90, T}$	The 'A'-weighted sound pressure level of the residual noise in decibels exceeded for 90 per cent of a given time (T). The $L_{A90, T}$ is used to describe the background noise levels at a particular location.
Rating Level, $L_{Ar, Tr}$	The specific sound level plus any adjustment for the characteristic features of the sound.
Specific Sound Level, $L_{Aeq, Tr}$	The equivalent continuous A-weighted sound pressure level produced by the specific sound source at the assessment location over a given reference time interval, Tr.

Appendix 4 **Unattended Noise Monitoring Results**

Time	L _{Aeq,T} (dB)	L _{Amax} (dB)	L _{A10,T} (dB)	L _{A90,T} (dB)
15:00-16:00	58	81	60	46
16:00-17:00	56	78	58	45
17:00-18:00	61	93	62	48
18:00-19:00	63	84	64	51
19:00-20:00	59	85	60	50
20:00-21:00	51	77	48	42
21:00-22:00	45	64	46	42
22:00-23:00	43	63	45	40
23:00-00:00	40	57	42	38
00:00-01:00	37	51	39	35
01:00-02:00	35	50	36	32
02:00-03:00	35	65	36	30
03:00-04:00	48	81	46	33
04:00-05:00	56	90	53	36
05:00-06:00	58	83	59	41
06:00-07:00	59	88	60	47
07:00-08:00	64	94	64	50
08:00-09:00	60	85	64	49



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