

Ref: LR05-21247-R0

Date: 8 April 2022

## CASS ALLEN COMMENTS ON RSK ACOUSTICS PROOF OF EVIDENCE

Set out below are a number of comments and areas of disagreement arising from a review the RSK Acoustics Proof of Evidence. There are also a number of other areas requiring further clarification however it is anticipated that this can form part of the proposed round table discussions.

### RSK Omitted Survey due to Pandemic

The reason provided by RSK as to why a noise survey of the site was not carried out is as follows:

*The original planning application was undertaken at a time when road traffic flows were significantly affected by the COVID 19 pandemic and so the noise levels at the site were not considered to be suitably representative by Cole Jarman. Due to this a noise survey has not been undertaken at the site.*

A review of the publically available Department for Transport (DfT) data relating to reduction in traffic flows throughout the pandemic shows that in January 2021 (the month the original Cole Jarman report was produced), national traffic levels were around 60% of normal. As a major transport route, it is reasonable to assume that the road traffic on the M25 would have dropped in line with this figure. This equates to a reduction of 2dB, a correction that could readily have been applied to any survey data taken at the time.

The above notwithstanding it is also the case that RSK Acoustics could have carried out a survey once road traffic levels were at a level closer to normal. Cass Allen carried out a survey in April 2021 where records show that road traffic levels were around 90% of normal; equating to a less than 0.5 dB difference. This difference is insignificant in practical terms and therefore representative of typical background noise levels at the site.

Given that the only noise survey data taken to date is the Cass Allen data (the accuracy of which is not in dispute), the results of that survey could also have been used to inform any ongoing assessment.

The above demonstrates that representative noise data could have been gathered despite the COVID 19 pandemic.

### No Penalties Applied to HGV Movements

RSK previously applied a +3 dB correction to the commercial noise (including both delivery noise and HGVs) and now have increased that correct to +6 dB for delivery noise and reduced the correction to 0 dB for HGVs. It has previously been suggested by Cass Allen that a correction of at least +6dB in line with BS4124 more accurately characterises the commercial noise emissions and so is welcomed for the delivery noise however removal of the correction for HGVs is not considered appropriate for the reasons below.

Thames Water access the water treatment site between 0600-2300 and therefore HGVs do not currently form part of the night time noise environment and vehicle movements associated with the Site will be introducing noise sources not currently experienced by the local residents at the most sensitive time of day. As a result it is entirely appropriate to apply character corrections in accordance with BS4142 to night time HGV movements and should be at least 6 dB for reasons given previously (however it may be the case that further corrections may also be required to fully characterise the perceivable noise).

HGVs accessing the water treatment plant are relatively distant from the noise sensitive receptors, slow moving and do not manoeuvre/ reverse etc. This is in contrast to the HGV operations at the Site which are significantly closer and will feature revving engines, manoeuvring, reversing alarms etc. As a result the character of the noise will be noticeably distinct from the existing HGVs. RSK Acoustics assert that as HGVs already form part of the noise environment at the site no character corrections are necessary however for the reasons given above it is considered that corrections in line with those proposed previously would more accurately characterise the perceivable noise and therefore the potential noise impact.

### **Background Noise Creep**

RSK assert that background noise creep only occurs when more than one commercial operator is in an area – Cass Allen agree with this assertion. It should however be noted that there are two units proposed at this site which may be let independently and so there is the possibility of this occurring. As such it remains our recommendation that any noise assessments accompanying a proposed occupation relies on noise levels prior to any occupation at all.

**Sam Bryant MPhys CEng MIOA**  
**Director**