



Matter 30 Response Policy DP18 Pollution and Amenity MM049 to MM050

Worfield & Rudge Parish Council would like to raise concern regarding the effectiveness of Policy DP18 Pollution and Amenity MM049, MM050 and propose a review be carried out with the aim of improving robustness and clarity of the policy.

MM049 The policy states the following: -

Para 2

1.1. Development which is likely to give rise to concerns about air quality, either on its own or cumulatively will provide an assessment proportionate to the scale of development and level of concern as follows:

- a. A baseline of the existing air quality on the site and surrounding area;
- b. A prediction of the future air quality without the development;
- c. A prediction of the likely effects of the development on air quality and suggested mitigation measures; and
- d. A prediction of the future air quality if the development were to proceed with the suggested mitigation measures in place.

Para 7&8

1.2. When development may create additional noise, during construction or operation, or when new development would be sensitive to the existing noise environment (including any anticipated changes to that environment from activities that are permitted but not yet commenced) proposals should include a noise assessment proportionate to the scale of development and the level of concern which sets out:

- a. Whether or not an adverse effect on health and quality of life is occurring or is likely to occur;
- b. The level of any adverse effect as defined in the Noise Policy Statement for England Explanatory Note and the noise exposure hierarchy table¹; and
- c. Whether a good standard of amenity can be achieved taking into account appropriate mitigation measures. Such measures should not make the development unsatisfactory in other respects.

8. The noise assessment should be prepared by an experienced specialist and follow industry good practice as set out in Professional Practice Guidance on Planning and Noise (ProPG). Proposals which result in an observed adverse effect² will be permitted where mitigation can either remove the effect or reduce it to a minimum. Proposals which cannot be practicably amended to prevent an unacceptable adverse effect² or to avoid a significant observed effect² will not be permitted.

1.3. The remit of paragraph 2 and 7 is that the assessments will be proportionate to the scale of the development. We feel that this is not specific enough in determining the true growth and scale of a development or site occurring over a prolonged period of time, existing and new



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development, and may not capture increases in pollution at the planning stage. We note some industrial or Business estates may grow less than 0.5ha questioning the need for Environmental Impact Assessment.

- 1.4. To provide an example, if we consider as evidence recent planning applications for Stanmore Business Park within Worfield and Rudge Parish, here over the last few years incrementally 17 units have been submitted for planning approval. However, these applications typically cover either individual units or a small groups of units. Some of the applications did not include Air Pollution Assessment nor noise assessment, some being speculative builds without proposed tenants. Arguably these units could pollute at a future date and will contribute to the overall air pollution and noise pollution of the area emanating from the estate, impacting residents and amenity.
- 1.5. We question why the residents' complaints have arisen, is this due to policy failure or process failure and finally are resident complaints valid.
- 1.6. Two issues are of consideration when faced with complaint or concern being raised: -
 - 1.6.1. Firstly the long term presence of resident complaints for air pollution and noise at resident locations as well as the Stanmore Country Park, an amenity area that is adjacent to the Business park. These are documented in relevant Worfield and Rudge Parish Council meeting minutes as well as most related planning application objections for the site as material considerations.
 - 1.6.2. Secondly the expectation is that tenants will thrive on the site. Does policy take into account increase in pollution as tenants thrive and is an adequate monitoring process being followed?
- 1.7. Recent applications for approval were 24/02781/FUL, 24/00555/FUL, 23/01680/FUL, 22/01264/Ful, 21/03808/FUL.
- 1.8. Residents' complaints of noise and airborne pollution would, if supportable, indicate potential failure in current policy or process and may question the soundness of proposed policy DP18. If failure in current policy is determined, mitigation or change in policy or procedure is requested in order that policy and procedure prevent harm being caused to Residents and Environment within Shropshire as a whole.
- 1.9. Stanmore, applications 22/01264/FUL, 24/02781/FUL we request review of Noise reports related to the current site and in addition STC002.
- 1.10. Focus should be drawn to nearest receptor locations in 22/01264/FUL and Lamax,F readings unattended, noting exceedance of 60db for 124 occurrences over circa 3 days, 15 minute time duration measurement, 19 occurred during a sleep period with one measurement exceeding 80db. The risk profile of the site should be reviewed and considered in terms of suitability.
- 1.11. Although we are not specialists in aeroacoustics, review of ProPg has raised concern regarding 1.10.
- 1.12. Focus should then be drawn to cross comparison of noise assessment reports 22/01264/FUL, 24/02781/FUL and nearest receptor location.



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- 1.13. In terms of Airborne pollution, no simulation data is currently available for review of the current emissions emanating from the site, however given the complaints of malodour, we feel DP18 should be reviewed for consistency of approach between noise and air pollution.
- 1.14. To address these issues clarity is sought in the following text, however we defer to the wisdom of the inspector in determining the best approach, paragraph 2:-
- 1.14.1. Development which is likely to give rise to concerns about air quality, either on its own or cumulatively will provide an assessment proportionate to the scale of development and level of concern as follows:
- 1.14.2. We would suggest that this text refer to source locations being of importance that would reasonably be expected to be main contributors to site pollution. Text for consideration could be “..... cumulatively will provide an assessment proportionate to the scale of development, scale of and number of all emission sources at the site located at, and level of concern as follows: “
- 1.14.3. We support the bullet pointed steps for assessing air pollution.
- 1.15. In terms of Noise assessment paragraph 7 and accompanying text “...or when new development would be sensitive to the existing noise environment (including any anticipated changes to that environment from activities that are permitted but not yet commenced) proposals should include a noise assessment proportionate to the scale of development and the level of concern which sets out:.....”
- 1.16. A suggestion may be as follows “ ...or when new development would be sensitive to the existing noise environment (including any anticipated changes to that environment from activities that are permitted but not yet commenced), or existing development would be sensitive to anticipated changes, proposals should include a noise assessment proportionate to the scale of development, and scale of all existing sources of noise at the site located at, and the level of concern which sets out:”

MM050 Explanation notes

- 1.17. The policy explanation notes could possibly clarify how industrial noise is accounted for and the implications for existing residential locations. The WHO Guidelines for Community Noise may be a good reference to quote.

Conclusion

- 1.18. We defer to the expertise of the Inspector on this matter given our limited understanding.

References

[1] [ProPG | Institute of Acoustics \(ioa.org.uk\)](http://ProPG | Institute of Acoustics (ioa.org.uk))

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