

Our Ref: E3022 210409-LJ-ND

Your Ref:

Date: 9<sup>th</sup> April, 2021

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Dear Lisa,

## **PROPOSED CREMATORIUM AT TURNERS HILL – RESPONSE TO OBJECTIONS ON AIR QUALITY AND NOISE**

This letter provides an update on the above proposal, and a response to the Third Party objections raised regarding air quality and noise impacts associated with the proposed Crematorium at Turners Hill.

### **Air Quality**

An air quality assessment was undertaken to determine the likely impacts of the proposed Crematorium on nearby human and ecological receptors. The assessment comprised a review of the existing background concentrations in the vicinity of the Site and detailed modelling of the emissions to air. Emissions to air from the Crematorium plant were assessed using the detailed model AERMOD. Emissions to air from traffic associated within the operation of the Crematorium were assessed using the detailed model ADMS-Roads at receptors within the Ashdown Forest SAC / SPA and SSSI.

The findings of the air quality assessment indicated that there would be no significant impacts regarding either the emissions from the crematorium plant or the traffic associated with the operation of the Crematorium.

Since the Air Quality Assessment was completed, DEFRA have issued revised emission factors and background concentrations which were released in August 2020. Both the revised emission factors and background concentrations are slightly lower than the previous version. The assessment completed therefore remains a worst-case assessment.

In accordance with the Environmental Permitting (England & Wales) Regulations 2016, an Environmental Permit will be required from the Environment Agency. This will incorporate measures to minimise and control emissions to air and ensure there are no significant adverse impacts.

On this basis, the Environmental Health Officer (EHO) of MSDC has raised no objection to the proposed development of the Site as a Crematorium. The EHO has recommended that a pre-commencement condition be included requiring a scheme of mitigation measures to be produced.

The third-party objections do not raise any specific issues with regards to the air quality assessment. A few objections mention air pollution or air quality as a concern but do not specify what the concern relates to. It is considered that the air quality assessment addresses these concerns as the findings are that the impact will be insignificant.



## Noise

An assessment of noise impacts associated with the proposed Crematorium has not been undertaken as this was not requested by the Local Authority for the planning application.

The closest noise sensitive property in the vicinity of the Site is St Leonards church located to the south of Turners Hill road approximately 230m to the east of the boundary of the Site and approximately 300m from the proposed position of the crematorium plant.

There are three noise sources under consideration for crematoriums:

1. Traffic Noise;
2. Noise associated with the Chapel (music);
3. Noise associated with the mechanical plant associated with heating/cooling, refrigeration and ventilation and also from the noise of the cremators.

In terms of traffic noise there is likely to be an increase of less than 38 vehicles per service over and above the existing traffic flows. This amounts to a noise change of less than 1 dB (for 6 services per day) and it is widely accepted (UK Government's Design Manual for Roads & Bridges (LA 111, Table 3.45a) that such increases in traffic will be imperceptible at nearby noise sensitive receptors.

Music within the Chapel will be at a low volume and enclosed within the chapel building and therefore music noise will not be perceptible at the nearest noise sensitive receptor (NSR).

The noise data (for a similar facility) shows that the internal fixed plant of the crematorium will be less than 55 dB(A) just outside the roller shutter doors of the plant room. The only other external plant is the 'Dry Air Cooler' which is rated at 37 dB(A) at 20m. Considering the 58m distance between all the plant and the nearest footpath (68W), cumulative noise levels will be less than 28 dB(A). This noise level is below the guidance limit inside a bedroom at night (WHO/BS8233 noise limit of 30 dB(A)) and therefore likely to be well below the existing daytime noise climate either at the nearest footpath and at the much more distant dwellings.

The appeal site lies beyond the 54 dB  $L_{Aeq,T}$  noise contour for Gatwick Airport (Summer 2019, actual modal split) and therefore further consideration of airside noise from Gatwick Airport is not required (the latest noise contours published by Gatwick Airport are attached separate to this letter).

We therefore conclude that noise from traffic noise, the Chapel, fixed plant or Gatwick Airport will not be a material issue for this Appeal.

Concerns regarding noise are mentioned in two responses, one did not specify the reason for the concern and the other was concerned with cumulative noise in combination with Tulleys Shocktoberfest. This is an event held in October between the hours of 5pm and 11:30pm at Tully Farm to the west of the Site. Due to the opening times and distance from the Site, it is unlikely that there would be any combined effects on noise levels as a result of the proposed Crematorium and the Shocktoberfest event.

It should also be noted that the Site comprises part previous developed land and benefits from a number of fall-back permissions and therefore should the proposed appeal be dismissed then there is a strong likelihood of other uses that would generate similar noise levels to the Proposed Development.

The Proposed Development would also be regulated by an Environmental Permit which controls both emissions to air and noise to ensure there are no significant adverse impacts beyond the site boundary.



I trust the above covers all matters in sufficient detail, however, please do not hesitate to contact me if you require any further information.

Yours sincerely

**Dr Nick Davey**

**Director**

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