

Consultation Response from: KC Environmental Health (Pollution & Noise Control)
2020/90632 - 103 New Street, Huddersfield HD1 2TW
Discharge condition 9 (construction method statement) and 13 (ventilation scheme) on previous permission 2019/92127 for variation of condition 2 (plans) on previous application 2017/93886 for erection of extensions and alterations to convert existing building to student accommodation
Date Responded:
29 Sep 2020

Responding Officer:
Richard Hume

Responding Ref:
WK/202010391

In our previous response dated 12 May 2020 we recommended that both condition 9 and 13 should not be discharged because the information submitted at that time was insufficient for the requirements of the conditions.

Condition 9 – Construction Method Statement

Only Part (i) Hours for construction activities and Part (vii) control of dust emissions of condition 9 are within the remit Environmental Health. This response therefore is only in relation to those two parts. A Construction Phase Health & Safety Plan (Rev2) by Big Red Industries dated 10 May 2020 has now been received. This document relates mainly to the applicant's requirements regarding Health & Safety rather than condition 9 and provided little or no information regarding the times for construction activities and the effective control of dust emissions.

Condition 9 - Recommendations

For the reasons detailed above I consider that the information submitted is insufficient for at least parts (i) & (vii) of condition 9 and therefore recommend that condition 9 should not be discharged at this time.

Condition 13 – Ventilation Scheme

A Ventilation Strategy by Brentwood Consulting Engineers (rev-01) dated 29 June 2020 (ref: 5334) has now been received. The document details a Mechanical Ventilation Heat Recovery system incorporating heat recovery with 90% efficiency. It also advises that purge ventilation will be achieved by opening windows. Part 3 considers the Air Quality issues and advises that the air intakes for rooms affected by poor air quality will be provided with NOx filters.

Although the report refers to the approved noise assessment it fails to take full account of the recommendations of that report and also the requirements of condition 13. In particular the noise assessment report advises in Table 9 and Figure 3 that acoustic glazing is required throughout the whole development. For the acoustic glazing to provide the required level of noise attenuation the window needs to be kept closed. Condition 13 clearly states that the required ventilation system needs to show how noise affected rooms "*shall be ventilated without the need to open windows*". Therefore, the proposal for achieving purge ventilation by opening windows negates the necessary noise mitigation measures and is also contrary to the requirements of condition 13.

The required ventilation system must be sufficient to provide levels of ventilation that is normally provided by open windows. This is particularly important in hot weather when ventilation is required to provide cooling to prevent overheating. Therefore, to be acceptable, the ventilation system must incorporate a bypass facility for any heat exchanges otherwise in hot weather incoming air will be heated in the heat exchange by the outgoing warm air and will therefore not provide the required cooling effect.

The poor air quality on the southern part of the development also needs to be taken into account with the design of ventilation system. The proposals for providing NO_x filters to the air intakes at areas of the development located where the National Air Quality Objectives are exceeded are noted. If this proposal is to be repeated then the specification of the proposed filters needs to be provided with details of the proposed ongoing maintenance of the filters that will be necessary. A lower maintenance alternative option of having all of the air intakes away from areas of poor air quality should ideally be considered.

Condition 13 - Recommendations

For the reasons detailed above I consider that the submitted information is insufficient to meet the requirements of condition 13 and therefore recommend that condition 13 should not be discharged at this time.