Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2025/90548 78 John William Street, Huddersfield, HD1 1EH		
Change of use and alterations to convert offices to 14 apartments (use class C3) (Listed Building within a Conservation Area)		
Responding Date: 1st July 2025	**Responding Officer:** SR	**Responding Ref:** WK202518375

Comments

We have reviewed the application in relation to the elements within the remit of Environmental Health and make the following comments and recommendations. The building is located within the town centre of Huddersfield on busy roadways; plans show bedrooms and living rooms at below ground floor with windows at street level.

Air Quality

An undated, unreferenced Air Quality Statement by C49 Architecture Ltd has been submitted in support of the application. The proposed development is located in Huddersfield Town Centre which has been declared an Air Quality Management Area (AQMA 9) for exceedances of the annual mean nitrogen dioxide (NO2) objective. An air quality assessment therefore is required to determine the impact of the development on local air quality during the construction and operational phases, and the likely exposure of onsite sensitive receptors to elevated pollution levels.

We have concerns that the document refers to table 3 and figure 3 which are not within the statement. There is also a reference to Warick which clearly is not relevant to Huddersfield town centre. We have concerns that the report author has not considered the low level windows to bedrooms and living rooms, some of which are below ground floor level on busy town centre streets. The statement includes the wording: - “It has been assumed that the operation phase of the development will commence in 2020”.; this is clearly not the case.

For the reasons stated above we do not have full confidence in the Air Quality Statement by C49 Architecture Ltd and recommend a pre determination Air Quality Impact Assessment is submitted for scrutiny. The air quality assessment must identify the level of exposure of future occupants and provide appropriate mitigation measures. If the levels predicted in the report are unacceptable, it may be necessary to refuse the application.

Noise

The building is located within the town centre of Huddersfield on busy roadways, with nearby commercial buildings (customers/entertainment/deliveries) and a nearby operational railway. The proposed accommodation may share party walls with commercial businesses, some of which may have plant located close to windows. The plant and lift within the proposed development could be a source of noise.

All of these have potential to produce noise that could be detrimental to the amenity of future occupiers. We are particularly concerned that living accommodation is shown on the lower ground and ground floors with large windows on street facing facades.

Before the application can be determined, details of an assessment of all significant noise sources likely to affect the proposed development including road/rail traffic and commercial premises by a suitably competent person (see note) must be submitted in writing to the Local Planning Authority. The report shall:

a) Determine the existing noise climate

b) Predict the noise climate in the living rooms (daytime), bedrooms (night-time) and other habitable rooms of the development

c) Detail the proposed attenuation/design necessary to protect the amenity of the occupants of the new residences. If the noise attenuation measures include windows being kept closed, then details of alternative ventilation over background ventilation will be required.

If levels predicted in the report are unacceptable, it may be necessary to refuse the application. Otherwise, it may be necessary to specify attenuation measures as conditions of consent.

We require this information to ensure that the proposed use(s) does not give rise to the loss of amenity to future occupiers, by reason of noise or disturbance and to accord with the aims of Policies LP24 and LP52 of the Kirklees Local Plan and Chapters 12 and 15 of the National Planning Policy Framework.

NF4 Competent Person - Footnote

All noise assessments should be carried out by a competent person. The applicant may wish to contact the Association of Noise Consultants http://www.association-of-noise-consultants.co.uk/ (020 8253 4518) or the Institute of Acoustics http://www.ioa.org.uk (0300 999 9675) for a list of members.