Consultation Response from: KC Environmental Health (Pollution & Noise Control)		
2025/93083- 3/5/7, Mill Street East, Savile Town, Dewsbury, WF12 9AQ		
Change of use from storage (B8) to children's home (C2)		
Date Responded: Monday, 04 May 2026	**Responding Officer: Hannah Kent**	**Responding Ref: WK/202611963**

Thank you for consulting Environmental Health on the above application.

COMMENTS

NOISE

The applicant has submitted a Noise Impact Assessment Report Ref: NP-013941, dated 12th March 2026, prepared by Nova Acoustics Limited. The report confirms that:

"NOVA Acoustics Ltd has been commissioned to prepare a noise assessment for a residential development ('the proposed development') at 3-7 Mill Street East, Dewsbury, Kirklees, WF12 9AQ ('the site'). The site is subject to road noise from Mill Street East and commercial/light industrial noise from the surrounding premises.".

The report presents the findings of an environmental noise survey, and:

"*The findings have been used to assess the suitability of the site for residential use. Measures required to mitigate noise impacts have been assessed in accordance with the relevant performance standards… BS8233:2014 …and noise emissions arising from surrounding commercial and industrial activities, including plant and vehicle servicing operations, is assessed in accordance with BS4142:2014+A1:2019.*

Accordingly, this assessment considers both the suitability of the internal acoustic environment for future occupants and the compatibility of the proposed development within the existing industrial character of the surrounding area".

The environmental noise survey was undertaken; Table 1 presents the measurement methodology:

Location	Survey Dates	Measurement Particulars
MP1 (Long-term)	25-27/02/2026	Equipment protruding from a first-floor window at a distance of 1m from the building façade on Mill Street E.
MP2 (Long-term)		Equipment protruding from a first-floor window at a distance of 1m from the building façade on the rear elevation.
MP3 (Short-term)	25/02/26, 15:50 – 16:25 & 27/02/26, 10:00 – 11:00	Equipment mounted on a tripod at 1.5m from the ground in free-field conditions.

Table 1 – Measurement Methodology

Section 2.2 of the report identifies the contextual surroundings of the site as follows:

"The site is located on Mill Street East in Dewsbury, within a predominantly commercial/light industrial area. Surrounding land uses include garages and workshops located immediately to the rear of the site, a car wash facility to the east, and a number of industrial units along Mill Street East. The surrounding environment contains a range of activities capable of generating

noise, including vehicle movements, servicing operations and fixed plant associated with nearby commercial premises".

The attending acoustic engineer observed the noise environment during site visits as:

"During the site visit, the prevailing acoustic environment was dominated by road traffic noise from Mill Street East, which was clearly audible throughout the survey period and formed the primary background noise source. In addition to road traffic, a tonal mechanical noise associated with a large extraction system located at the HSA Manufacturing premises across Mill Street East was clearly perceptible at the front of the site".

*THE OPERATING HOURS OF THE HSA MANUFACTURING PREMISES ARE STATED AS UNKNOWN.

"The short-term attended measurements undertaken at the rear of the site, the dominant noise source continued to be road traffic from Mill Street East, with intermittent noise emissions associated with nearby commercial activities also audible at times. Noise associated with the adjacent car wash facility was also intermittently audible at the rear of the site, primarily from the operation of jet wash equipment and associated plant. Activity from the garage units was generally limited during the survey period; however, occasional noise emissions were observed, including vehicle movements, engine idling noise and the use of mechanical tools. These activities produced intermittent and occasionally impulsive noise events, such as those associated with compressed air equipment, etc".

The results of the environmental noise survey are presented in Table 3:

Location	Measurement Period ('T')	Octave Frequency Band (Hz, dB)							Overall (dBA)
		63	125	250	500	1k	2k	4k	
MP1	Average $L_{eq,16hr}$ (Day)	66	60	60	59	58	55	49	62
	Highest $L_{eq,1hr}$ (Day)	69	63	65	64	63	59	52	67
	Average $L_{eq,8hr}$ (Night)	59	52	52	51	52	48	41	55
	Highest $L_{eq,1hr}$ (Night)	64	56	56	56	57	54	48	61
	Typical $L_{AFmax,2min}$ (Night)	78	74	79	75	73	72	64	78
MP2	Average $L_{eq,16hr}$ (Day)	56	49	49	48	48	47	47	54
	Highest $L_{eq,1hr}$ (Day)	56	53	56	56	54	51	51	59
	Average $L_{eq,8hr}$ (Night)	49	44	41	38	37	32	28	41
	Highest $L_{eq,1hr}$ (Night)	53	48	45	42	41	39	32	46
	Typical $L_{AFmax,2min}$ (Night)	63	61	54	55	55	48	39	59
MP3	Average $L_{eq,40min}$ (Day)	55	48	51	50	44	43	43	52
	Average $L_{eq,1hr}$ (Day)	56	51	51	50	46	43	41	52

Table 3 – Sound Level Results Summary

They demonstrate that noise levels at the site are particularly intrusive during the nighttime, identifying an $L_{AFmax, 2min}$ at MP1. It is not clear from the results presented in the assessment if L_{AFmax} noise levels have been recorded for short time periods (for example 1 second), however, the use of the $L_{AFmax, 2min}$ under-represents the significance of high noise events that are likely to disturb or awaken children homed at the proposed residential development. If the

$L_{AFmax, 2min}$ is 78dBA, it is likely that there are significantly more than 10 shorter term L_{AFmax} noise events that will disturb sleep or awaken the children homed on site. For there to be ten nighttime noise events with noise levels that averaged 78dBA (over a two-minute duration), suggests that this is not an appropriate location for a development housing vulnerable children.

Environmental Health do not accept the use of the $L_{AFmax, 2min}$ as an appropriate metric for identifying the number of events per night that may disturb sleep. This is a health-related noise event that should be identified by the LAFmax or SEL metric. The L_{AFmax} should not be averaged over 2 minutes as this will significantly reduce the number of high-impact noise events reported. This is entirely inappropriate.

BS4142:2014+A1:2019

The submitted Noise Impact Assessment Report has identified that road traffic noise along with tonal noise *associated with a large extraction system* was clearly perceptible as well as noise from the *adjacent car wash facility* to the rear. A BS4142:2014+A1:2019 assessment was undertaken, identifying that noise levels result in a Significant Adverse Impact and therefore will require significant noise mitigation measures to reduce the impacts to within acceptable parameters.

Noise Break-in Assessment and Sound Insulation Scheme

Section 5 of the report addresses how acceptable internal noise levels can be achieved.

This section of the report is somewhat confusing. For example, section 5.1 states:

"To protect future occupants from fluctuations in commercial noise, the highest Leq,1h measurements are used for the noise break-in calculations".

However, the noise levels used in Table 10 (using the highest Leq, 1hr), shows a value of 67dB at the front and 60dB at the rear (including a 6dB penalty, that is 54dB plus 6dB = 60dB). Table 7 shows a measured hour from 17:15-18:15hrs on the 26th February 2026 giving an hourly noise level of 60dB LAeq, with the 6dB penalty becomes 66dB LAeq. Surely this value should be used if "*the highest Leq,1h measurements"* are being used?

Furthermore, the measured noise levels have a low-frequency component, which is supposed to be addressed in Table 8 - Low Frequency Acoustic Design Criteria, providing noise levels of 47dB and 41dB at 63Hz and 125Hz respectively. However, whilst Table 9 - Internal Acoustic Design Criteria usefully includes Noise Rating (NR) curves, NR30 and NR35, no further references are made to NR curves within the break-in assessment or proposed sound insulation and therefore, it is not clear if the internal design criteria has been met.

The assessment then discusses overheating mitigation requirements, identifying that:

"In order to avoid excessively high temperatures and provide adequate levels of thermal comfort within dwellings, an overheating mitigation strategy must be developed. In low noise areas, this strategy can often rely upon opening windows as the primary source of ventilation, however, in areas with higher levels of noise, this would present a risk of adverse effects on health and quality of life… a secondary ventilation system will need to be installed for all habitable rooms".

Section 7 of the assessment details mechanical ventilation requirements, and section 8 discusses noise breakthrough criteria, identifying that:

"The proposed development structurally adjoins a commercial/light industrial premise via partition walls to the west… At the time of preparing this assessment, the exact operational use of the adjoining commercial unit is not confirmed".

The assessment then uses an assumption (based on surrounding land-uses) and proposes a; *"noise profile has been taken from measurements of a vehicle MOT site carried out by NOVA Acoustics previously",* to predict a sound insulation requirement for the partition wall.

Section 9 identifies *"plant noise limit levels have been defined to ensure that plant noise emissions do not result in adverse noise impacts at the nearest noise-sensitive receptors"* for the development.

The report concludes in section 10 with 'Action Plan' *"to ensure the design considerations and specifications from this report are duly implemented".*

RECOMMENDATIONS

Noise levels in the area of the proposed development are high and comprise of low-frequency and impulsive components. Furthermore, nighttime noise is considerable with a low-frequency component.

Environmental Health do not consider the site is appropriate for the proposed development, and on this basis recommend that the application is REFUSED.