

**Consultation Response from: KC Environmental Health (Pollution & Noise Control)**

**2025/93343 - Unit 13 and 14, Shaw Park, Silver Street, Moldgreen, HD5 9AF**

**Use of units 13 and 14 as brand-approved accident repair centre and installation of two industry standard spray booths within the existing building**

**Date Responded:**  
**Monday, 01 June 2026**

**Responding Officer:**  
**HK**

**Responding Ref:**  
**WK/202613335**

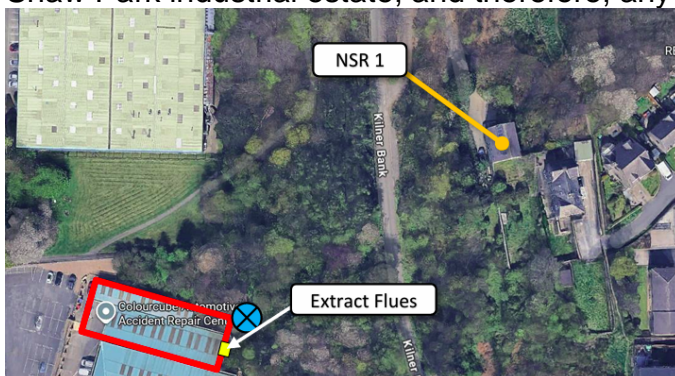
Thank you for consulting Environmental Health on the above application.

**COMMENTS**

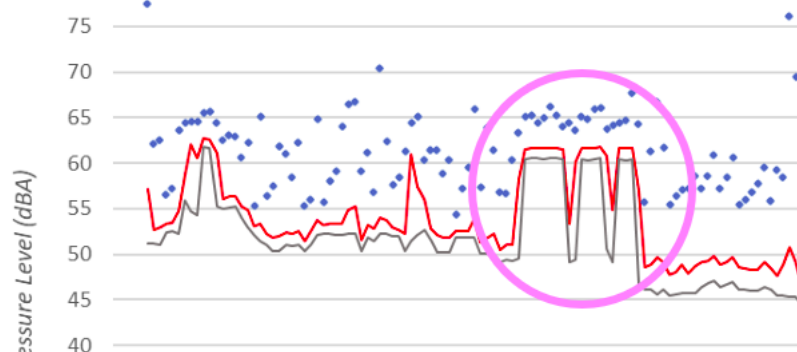
**NOISE**

The applicant has submitted a Noise Impact Assessment Report, Ref: 0804261, dated 29/04/2026, prepared by Peak Acoustics Limited.

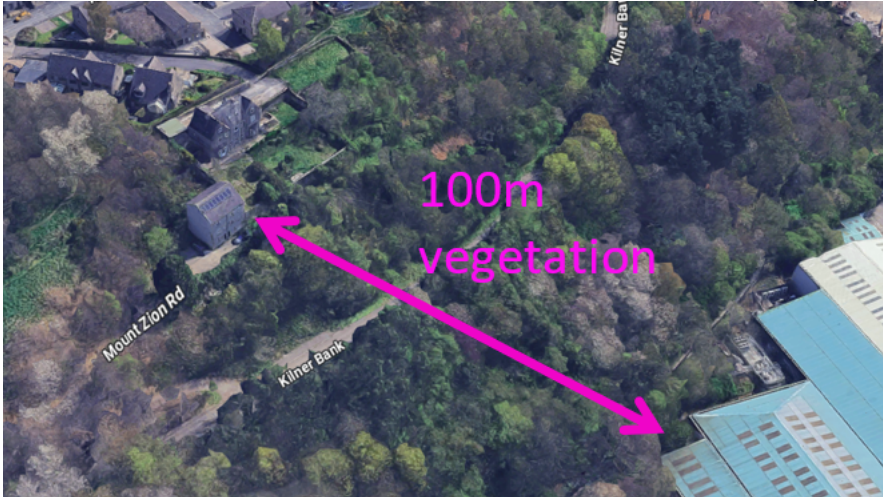
The report presents the findings of a 24hr environmental noise survey undertaken on the 14<sup>th</sup>-15<sup>th</sup> April 2026. The baseline environmental noise survey measurement position (MP1) “was positioned to the northeast site boundary at a height of approximately 2 metres”. This was “deemed representative of sound levels at ‘NSR 1’ during the typical operational periods of the development”. However, the nearest noise sensitive receptor is 100m away from the Shaw Park industrial estate, and therefore, any noise levels measured at MP1 on site



will benefit from 100m of distance attenuation, reducing operational noise levels between those on site and those experienced at the nearest noise sensitive receptor NSR1. Therefore the use of an on-site measurement position “as representative” is likely to result in an over-estimation of the environmental noise levels at NSR1. MP1 will be measuring operational noise levels from the Shaw Park industrial units. This is demonstrated in Figure 4: Measured Background Sound Levels Time History where it is clear that operational on-site noise levels formed part of the measured noise levels, and are therefore not representative (without 100m distance attenuation):



Whilst this is acknowledged in the site description of the assessment, *“the site is an industrial building within the Shaw Park industrial estate in Huddersfield. Surrounding businesses include a fabrication company, furniture manufacturer and engineering company”*. Table 1: Subjective Summary of Noise Sources – identifies that a *“large extract system on neighbouring industrial unit - Constant during site visit”* and *“power tools – intermittent during site visit”* and *“road traffic - Cars, vans, HGVs, Buses etc passing the site”*.



NSR1 is 100m away from these noise sources and therefore a measurement position on site cannot be *“deemed representative of sound levels at ‘NSR 1’* for use within calculations without distance attenuating these measured operational noise levels. Environmental Health do not consider it appropriate to use measured on site noise levels as representative of noise levels at NSR1 – NSR1 is located 100m away in a residential setting separated by vegetation.

The BS4142:2014 uses the *ISO-9613-2 - Attenuation of sound during propagation outdoors* distance attenuation calculation to reduce the on-site noise levels using ‘SoundPLAN’ to calculate the noise output from the extract flues sound power levels – resulting in a source noise level of 84 dB LAeq,T at 1 m from the source reducing the source noise level to 42dB LAeq,T at NSR1. Using this scenario, the specific sound will benefit from distance attenuation noise reductions, whereas the other measured operational noise sources measured *“to the northeast site boundary at a height of approximately 2 metres”* will not, and form part of the representative sound levels at NSR 1.

We do not consider the submitted noise assessment using this flawed methodology to be acceptable. Baseline noise levels will require revising and the BS4142 assessment repeating with the corrected NSR background sound level – either by:

1. Using a distance attenuated calculated noise level reducing the on-site operational noise levels measured *“to the northeast site boundary at a height of approximately 2 metres”* by the appropriate separating distance, or by
2. Direct measurement at a representative residential noise sensitive receptor location.

### **ODOUR**

An Odour Assessment Report, Ref: 10854r2, dated 28th April 2026, prepared by Redmore Environmental Ltd.

The assessment uses the appropriate *“Guidance on the Assessment of Odour for Planning v1.1, IAQM, 2018”* to assess the predicted odour effect significance, and determined that odours would be considered *“negligible at all receptors as a result of emissions”* and *“as such,*

*potential impacts as a result of emissions from the proposals are considered to be not significant’.*

The submitted odour confirms that odours should not present a constraint to the proposed development. However, in order to ensure that odours are negligible, the proposed development will need to be constructed and maintained in accordance with the odour mitigation measures detailed in section 1.2 of the submitted report, namely:

- Genesis ‘Q’ series combination Spraybooth / oven with rear chest extracted Spraybooth, 7m x 4m x 3.0m high with Evolution PLC control system Paint mixing and gun wash room, combined unit 5.2m x 2m x 2.5m high.
- The spray booths will be operational for less than 50% of the centre opening hours.
- Two double skin insulated self-closing personnel escape doors, one exiting the paint mixing area, the second the gun wash. The doors will incorporate compression seals, a self-closing device and glazing.
- The spray booths will incorporate high efficiency filtration and extraction systems including multi-paint arrestor filters to treat emissions prior to discharge.
- Paint spraying will occur within the spray booths only and not within the main workshop.
- The stacks associated with the spray booths will discharge on the eastern side of the building at heights of 2.00m and 2.40m above ridge height.
- Air will be discharged vertically at a minimum efflux velocity of 15m/s to ensure a suitable level of dispersion.
- The spray booths will use only brand approved water-based paints.
- Paint products will be stored in an enclosed paint mixing room/ gun wash room which will be located within the existing workshop.
- All equipment associated with the proposed development will be serviced/ calibrated in line with the necessary service plans.

The applicant will need to implement these odour mitigation measures and submit details of the same including service and maintenance plans to the local planning authority to demonstrate how odours will be controlled throughout the lifetime of the proposed plant – to protect the amenity of the nearby odour sensitive receptors.

#### **ENVIRONMENTAL PERMIT (Vehicle Respraying)**

The spraying of road vehicles is subject to Local Authority control with regards to emissions to air. Vehicle re-sprayers using in excess of 1 tonne of organic solvents in any 12 month period will require an Environmental Permit, under the Environmental permitting (England and Wales) Regulations 2016.

The plant may require a permit under the Environmental Permitting (England and Wales) Regulations 2016. The applicant should seek advice from Environmental Health, PO Box 1720, Huddersfield, HD1 9EL. Telephone 01484 221000 or email [pollution@kirklees.gov.uk](mailto:pollution@kirklees.gov.uk)

#### **Electric Vehicle Charging Points (EVCPs)**

In an application of this nature, it is expected that facilities for charging electric vehicles and other ultra-low emission vehicles are provided in accordance with the National Planning Policy

Framework and *Air Quality & Emissions Technical Planning Guidance* from the West Yorkshire Low Emissions Strategy Group. A condition requiring charging points is therefore necessary.

## **RECOMMENDATIONS**

Environmental Health have no objections to the proposed development, subject to the following:

In view of the issues outlined with the submitted Noise Impact Assessment Report, Ref: 0804261, dated 29/04/2026; before Environmental Health are satisfied with the noise assessment, baseline noise levels require revising and the BS4142 assessment repeating with the corrected NSR background sound level.

However, it is unlikely that noise levels associated with the proposed plant will present a constraint on determining the development, and therefore, we would recommend including the following noise condition, and the resubmission of the revised Noise Impact Assessment:

### **NC8 Noise Report required for proposed noise generating use close to existing noise sensitive premises - Condition**

Before construction work commences, a noise assessment report by a suitably competent person shall be submitted to and approved in writing by the Local Planning Authority. The report shall include:

- a) an assessment of all noise emissions from the proposed development
- b) details of existing background and predicted future noise levels at the boundary of a nearby noise sensitive premises on Kilner Bank or Church Lane, Moldgreen
- c) a written scheme of how the occupants of the above-mentioned noise sensitive premises will be protected from noise from the proposed development including details of all necessary noise attenuation

The development shall not be brought into use until all works comprised within the measures specified in the approved report have been carried out in full and such measures shall be thereafter retained.

**Reason:** To ensure the proposed development does not cause harmful noise pollution within neighbouring noise sensitive locations, in the interest of amenity, to comply with the aims and objectives of Policies LP24 and LP52 of the Kirklees Local Plan and Chapters 12 and 15 of the National Planning Policy Framework.

### **Implementation of Odour Mitigation – Condition**

The development shall not be brought into use until details of all of the measures used to control odours from the proposed development (including service and maintenance plans), have been submitted to and agreed in full by the Local Planning Authority. The submitted odour control measures must be fully implemented, and such measures shall be thereafter retained.

**Reason:** To ensure the proposed development does not cause harmful odour or particulate pollution within neighbouring odour sensitive locations, in the interest of amenity, to comply with the aims and objectives of Policies LP24 and LP52 of the Kirklees Local Plan and Chapters 12 and 15 of the National Planning Policy Framework.

#### **EVC1 Electric Vehicle Charging Points – Condition**

Before the development is brought into use, a scheme outlining the specific facilities for charging electric vehicles and other ultra-low emission vehicles at the premises must be submitted to and approved in writing by the Local Planning Authority. This scheme must meet the minimum requirements in the current West Yorkshire Low Emission Strategy (WYLES) document. The approved facilities for charging electric vehicles must be installed before occupation and retained for use thereafter.

**Reason:** In the interest of supporting and encouraging low emission vehicles, in the interest of air quality enhancement, to comply with the aims and objectives of Policies LP20, LP24 and LP47 of the Kirklees Local Plan, Chapters 2, 9 and 15 of the National Planning Policy Framework and the West Yorkshire Low Emission Strategy (WYLES).

#### **EVF1 Electric Vehicle Charging Points – Footnote**

- The electrical supply of the final installation should allow the charging equipment to operate at full rated capacity, and the installation must comply with all applicable electrical requirements in force at the time of installation.

### **INFORMATIVES**

#### **ENVIRONMENTAL PERMIT (Vehicle Respraying)**

Vehicle re-sprayers using in excess of 1 tonne of organic solvents in any 12 month period will require an Environmental Permit, under the Environmental permitting (England and Wales) Regulations 2016.

#### **PPF1 Environmental Permitting- Footnote**

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