

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:
Tuesday, 30 June 2026

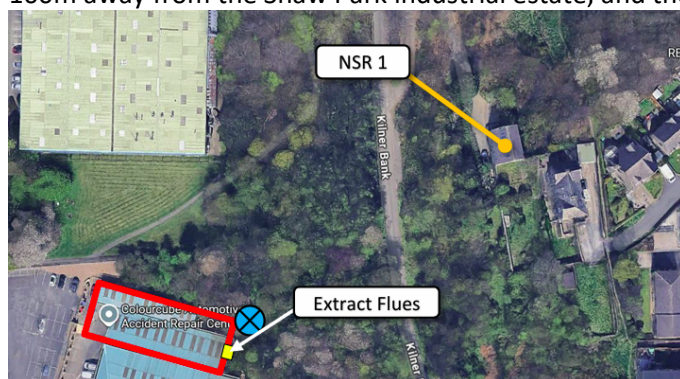
Responding Officer:
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Responding Ref:
WK/202613335

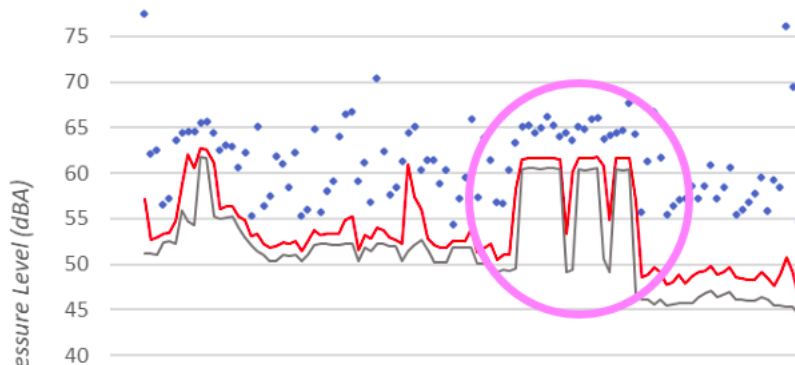
Thank you for consulting Environmental Health on the above application. We have previously responded to this consultation on the 1st June 2026 with the following comments in relation to noise:

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 14th-15th 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:

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 Direct measurement at a representative residential noise sensitive receptor location.

COMMENTS

NOISE

The applicant’s agent has responded providing further information, stating:

‘Further to the Environmental Health comments on the Noise Impact Assessment for Units 13 and 14, Shaw Park, we have undertaken additional background sound monitoring at Mount Zion Road, in the vicinity of the nearest residential receptor.

The representative background sound level measured at this location for the 08:00–17:00 operational period was 51 dB LA90,T.

The original assessment adopted a daytime operational background sound level of 52 dB LA90,T. Repeating the BS 4142 comparison using the directly measured receptor-area background sound level gives the following outcome:

Specific sound level at NSR1: 42 dB LAs

BS 4142 character correction: +3 dB

Resulting rating level: 45 dB LAr

Representative background sound level: 51 dB LA90,T

Difference: -6 dB

The revised comparison therefore remains below the representative background sound level and is still indicative of a low impact in accordance with BS 4142:2014+A1:2019.

The additional monitoring confirms that the use of the background level in the submitted assessment does not materially affect the outcome, and the conclusions of the Noise Impact Assessment remain unchanged.

I trust this addresses the Environmental Health comments, but please let me know if you require this to be issued as a formal addendum.'

The additional information is accepted and further to our response, we have revised our conclusion and recommendations to those outlined below.

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

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:

Further to our previous response and associated recommendations. Environmental Health accept the additional information provided by the applicants' acoustic consultant, which has resulted in our revised recommendations in relation to noise, as follows:

NC10 Noise from Fixed Plant & Equipment - Condition

The combined noise from the external flues serving the proposed spray booths shall be effectively controlled so that the combined rating level of noise from all such equipment does not exceed the background sound level at any time. "Rating level" and "background sound level" are as defined in BS 4142:2014+A1:2019.

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)

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PPF1 Environmental Permitting- Footnote

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