Walker Beak Mason

Consultants in Noise & Vibration

Paul Cockcroft BEng PhD CEng FIOA MIMMM Richard Lyons BEng PhD CEng MIOA MCIBSE Rachel Canham BEng MSc CEng FIOA



Steepleton Lodge Barn Long Lane East Haddon Northamptonshire NN6 8DU

Tel: 01604 771 101 Fax: 01604 771 416 E-mail: hq@wbm.co.uk Web: www.wbm.co.uk

Email Transmission

To: Brenda Vandamme

Company: -

Email: brendamarven@gmail.com
Subject: Swalcliffe Equestrian Centre

From: Matthew Sweet

9 January 2015

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Date:

Dear Brenda,

As requested by you on 7 January 2015, I have considered the noise report prepared by Idibri dated October 2014 and a letter prepared by Rob Lowther (Anti-social Behaviour Manager, AVDC) dated 31 December 2014, with regard to the current planning submission made by Swalcliffe Equestrian Centre. Rob Lowther's letter comments on the Idibri report, a Technical Note prepared by WBM dated 24 September 2014 and a previous WBM report dated 4 August 2014 prepared following the submission of an earlier, withdrawn planning application. My comments on both the Idibri report and Rob Lowther's letter are set out below.

In his letter Rob Lowther notes that survey work was carried out by Idibri and WBM on the same day, Sunday 21 September 2014, whilst an equestrian event was taking place. He has compared the measured noise levels for both reports and concludes that they are "comparable with no significant variations in the measured results obtained". It should be noted however, that the measurements taken by Idibri were at positions inside the site of the equestrian event, and therefore closer to site activities than for WBM's measurements, which were in the grounds of residents' properties. As such, the measurements taken by WBM present a more appropriate description of the noise climate at the receiver locations.

Rob Lowther states that he is relying on the specialist reports prepared by Idibri and WBM and does not present measurements or first-hand comments of his own. It therefore appears that he has not visited the site to witness the noise that occurs during an equestrian event such as the one on 21 September 2014. Although the Idibri report presents measured noise levels, it does not state what was occurring whilst the measurements were made. WBM's survey notes set out the distinctive noise sources that are present during such an event, including car horns, bells, whistles, shouting and applause, and most significantly announcements over the tannoy system.

In his letter Rob Lowther notes that Idibri has compared the measured noise levels with a value of 55 dB LAeq (15 min) as referenced in British Standard (BS) 8233: 1999, however he does point out that this standard has been withdrawn and replaced by BS 8233: 2014. This new standard proposes a guideline value for external noise of 50 dB LAeq,T as a desirable limit "with an upper guideline value of 55 dB LAeq,T which would be acceptable in noisier environments". Background noise levels measured by WBM on Sunday 22 September 2013 show that without an equestrian event occurring, the LA90,T noise levels in gardens ranged between 28 and 32 dB(A), with a measurement of 34 dB LA90,T taken at the front of Partway House adjacent to Main Street. With such background noise levels evident in the area it is therefore not a noisy environment. Two of the three average noise levels presented by Idibri would exceed an external noise limit of 50 dB LAeq.T.



Also with regard to BS 8233: 2014, the standard refers to noise sources without a specific character, previously termed "anonymous noise". The standard goes on to say that "Occupants are usually more tolerant of noise without a specific character than, for example, that from neighbours which can trigger complex emotional reactions". As stated above, the type of noise sources witnessed during the equestrian event were of a specific nature (car horns, bells, whistles, announcements over the tannoy system) and it is therefore not appropriate to consider guideline values from this standard.

The Idibri report sets out in Appendix B a summary of the *Code of Practice on Environmental Noise Control at Concerts* with a table that shows guideline values that the music noise level (MNL, defined as the L_{Aeq} of the music noise) should not exceed over a 15 minute period for varying numbers of concert days per calendar year. For 1 to 3 concert days per year in rural areas, the MNL should not exceed 65 dB(A), but for between 4 and 12 concert days per year, the MNL should not exceed the background noise level by more than 15 dB(A). Based on the background noise levels in gardens measured by WBM and stated above, for up to 12 events per year the guideline noise limit would be 43 to 47 dB $L_{Aeq,15 \, min}$. This noise limit would be in keeping with the noise target of 45 dB $L_{Aeq,15 \, min}$ suggested by Rob Lowther in the final paragraph of his letter. WBM would suggest however that if permission was granted for the equestrian events, a site noise limit should be at a lower level than this, as discussed below.

It is proposed by Swalcliffe Equestrian Centre in their Planning Statement (October 2014) to have equestrian events on 28 days per annum, which is therefore more than the allowance for external events in the *Code of Practice*. In the penultimate paragraph of Rob Lowther's letter he identifies the fact that if a Noise Management Plan were to be prepared to cover the events at the site, this should also include the activities associated with "the build phase of any temporary infra-structure, the use of portable generation equipment, the routing of vehicles with the site and the use of audible revers alarms on contractors vehicles, etc.". Effectively, these types of activities associated with the setting-up and breaking down of the site on days either side of the event also have the potential to generate noise and disturb the surrounding residents.

No further guidance is given in the *Code of Practice* table for situations where there are more than 12 concert days per year, however Notes 4 and 5 to the table state the following.

- "4. For those venues where more than three events per calendar year are expected, the frequency and scheduling of the events will affect the level of disturbance. In particular, additional disturbance can arise if events occur on more than three consecutive days without a reduction in the permitted MNL.
- 5. For indoor venues used for up to about 30 events per calendar year an MNL not exceeding the background noise by more than 5 dB(A) over a fifteen minute period is recommended for events finishing no later than 2300."

Note 4 recognises the fact that additional disturbance can arise where events occur on more than three consecutive days. With the inclusion of the days prior to and following the equestrian event days, the disruption caused by each event could last for more than 3 days, and should result in a reduction in the permitted MNL.



Note 5 refers to indoor venues, however without available guidance for a situation where more than 12 outside events per year, it is suggested by WBM that this noise criterion (i.e. 5 dB(A) above background noise) is considered. Based on this criterion and the background noise levels measured by WBM, this would suggest a noise limit for site activities of about 35dB $L_{Aeq,15 \text{ minutes}}$. This noise limit would need to apply to all activities associated with an event, including the car and horsebox parking area.

Yours sincerely,

Matthew Sweet

Consultant

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