

**ANNEX 1. APPLEFORD PARISH COUNCIL**

**COMMENTS ON NOISE REPORTS  
SUBMITTED WITH PLANNING APPLICATIONS**

**MW 0033/22 & MW 0034/22**

**Critical review of noise reports submitted with applications MW.0034/22 & MW.0033/22**

This Annex is an addendum to the Objection to Planning Applications MW 0032/22 and MW 0034/22 dated 18 April 2022. This provides a critique with comments on the Noise Reports submitted by the Applicant.

Comments on Noise Report:

**APPLEFORD RAIL SIDINGS Extension of operating hours -Noise Assessment.**

**Dated 21 March 2022 ref; 60663412 by AECOM.**

Hereafter referred to as the “2022 Noise Report”.

**1.0 Paragraph 2**

Paragraph 2 of the “2022 Noise Report” is misleading. It implies that the application to extend working hours applies only to the 150 day per year and to add only 1.5 hours to the weekday evening and 5.5 hours on Saturday.

This is not the extension applied for in the two applications MW.0034/22 and MW.0033/22. The planning applications seek a significant increase in extended hours for all weekdays (6:00am – 22:30pm – 16.5 hours) and all Saturdays (7:00am – 18:30pm – 11.5 hours) per table below.

Table - Increased Working Hours	Additional Working Hours		Full Working Day	
	Mon - Fri	Sat	Mon - Fri	Sat
Standard Day	0 hours	0 hours	11 hours	6 hours
Permitted late working (150 days).	+3 hours	0 hours	14 hours	6 hours
Applied for additional working (300+ days).	+5.5 hours	+5.5 hours	16.5 hours	11.5 hours
			<b><u>Per Week</u></b>	<b><u>Per Annum</u></b>
Increased hours (150 days)			+15 Hrs pw.	+450 Hrs pa
Increased hours. (300+ days)			+33 Hrs pw.	+1,650 Hrs pa
		<b>% increase</b>	<b>120%</b>	<b>267%</b>

The application is seeking a **267%** increase in working hours per annum for at least the next 5 years (with potential for an application for further years) .

**2.0 2017 Noise Report**

Paragraphs 3, 4.1, 6.2, and table 2 of the “2022 Noise Report” make reference to a previous report called the “2017 Noise Report”. This report titled ***“Sutton Courtenay Train Unloading off Portway, Appleford noise assessment”*** was dated 2<sup>nd</sup> June 2016 ref: 4023.000027.00432 by SLR. This was submitted with planning application MW.0028/17.

Para 4.1 refers to the **“2017 Noise Report”** and seeks to support the current application by citing that *“the 2017 noise assessment concluded that there would not be an adverse impact in extending the operating hours to 2100.”* The **“2017 Noise Report”** assessment was flawed and does not reflect the present circumstances.

- The receptors were positioned 700m and 610mm m away from the loading area of the Siding. Measurements at these locations do not represent the noise experience at dwellings

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within 100m of the branch of the sidings from the main line, which is the epicentre of noise disturbance.

- Comparison with background levels is misleading. Only two receptors were monitored, both remote from the sidings and subject to more localised noise from main line rail (Chambrai Close) and road traffic (Bridge House on the B 4016) . The appropriate criteria is the measured sound compared to the tolerable threshold.
- The assessment failed to report on measured L max noise levels at the receptors. For any assessment of the noise from Appleford Sidings this criterion rather than the LAeq is the most appropriate. L max will include the impulsive sound prevalent at Appleford Sidings which LAeq fails to consider.

### **3.0 2020 Noise Report**

Para 4.2 makes reference to a previous noise report this was titled **“Noise assessment -Construction and Operation of Two Additional Rail Sidings at Appleford Deport Sutton Courtenay”** dated April 2020 by AECOM. This was submitted with planning application MW.0046/20.

This report was flawed for the following reasons.

- Receptors do not represent dwelling within 100m of the branch of Appleford Sidings.
- The location of the noise source is not explained. However, the receptors are deemed to be 400m from the sound source so the modelling does not represent shunting of the trains on the curved sidings within 20m of nearest dwellings on Main road.
- The modelling results table 7 show low noise levels when compared with the noise source quoted in table 6. This would appear not to represent train shunting on the curve of the sidings close to Main Rd Appleford.
- The correction penalties applied to the BS 4142 assessment would not seem to represent the actual impulsive and tonal effects that are currently being experienced e.g. a locomotive idling at the sidings junction, 20m from a dwelling, waiting for 40 minutes to access the main line.
- No specific noise measurements were taken of the arrival , unloading idling and departure of a train for receptors representing dwelling facing the branch of the sidings from the main line.
- This report notes that during the weekday evenings, during the extended working hours, a 5dB increase has been identified when comparing the existing background sound levels against the rating level. BS4142:2014+A1:2019 requires consideration of the context and the report considers the context in the following sentence:

*"the context in this case includes similar sounds from vehicles using the local road network and/or from trains on the main line and hence the onset of impacts may be higher than +5 dB"*

the sound source of unloading/ loading trains is not similar to vehicle movements or rail movements as neither cause loud impulsive sounds which is the main issue in this instance.

The conclusion of this report *" additional rail sidings will not result in any discernible change to the existing noise climate in the local area."* was misleading and cannot be taken to support the present

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applications, MW.0034/22 and MW.0033/22.

**4.0 2022 Noise Report****4.1 Paragraph 6.1 Assessment of train movement**

The following statement is misleading *“As the 2020 noise report concluded that there would not be a noise impact from the train movements based on one train movement between 0000 and 0600, it is anticipated that there will not be an impact if this arrival and departure occurred during the proposed extension of the operating hours (from 2100 to 2230 Monday to Friday) when the ambient sound will be higher.”*

For the reasons quoted above, the findings of the 2020 report do not represent the noise at the most sensitive locations close to Appleford Sidings.

This paragraph makes no reference to the results of noise monitoring undertaken in November 2021 at the two dwellings close to Appleford Sidings, Seldene House and No 3 Main Road. This is the only relevant data to begin to assess the noise impact of train movements entering and leaving the sidings.

The statement *“it is anticipated that there will not be an impact if this arrival and departure occurred during the proposed extension of the operating hours”* is therefore, misleading and fails to represent the evidence of measurement.

**4.2 Paragraph 6.2 Assessment of Unloading**

The statement in paragraph 7 *“This assessment concludes that the extension to the operating hours is unlikely to cause adverse noise impacts.”* is misleading in respect of the assessment of unloading described in paragraph 6, for the following reasons;

- No noise levels specifically of aggregate unloading, as measured at the receptors Seldene House and No 3 Main Road were used to assess the noise impact of unloading.
- The assessment draws on *“predicted noise levels”* in the 2017 report. No predicted levels in this report applied to receptors at Seldene House, No 3 Main Road, or any other dwelling in Main Road.
- The source and determination of the background sound levels in table 3 and table 4 are not explained.
- In table 3 & 4 There is no explanation for the divergence between weekday and Saturday values for the background sound level minus the rating level.
- The assessment does not investigate and show measurements of impulsive sounds, such as the scraping of metal grabs, and tonal such as the low frequency of idling locomotives that are particularly distressing in currently experienced noise in Appleford. Section 9.3 of BS 4141:2014 outlines the need for further assessment to determine any low frequency tonal issues associated with the source.
- The assessment methodology is based on the BS4142:2014+ A1:2019 which is for industrial and commercial sound. It does not consider the Mineral extraction Guidance 2014 which states that;

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*“Peak or impulsive noise, which may include some reversing beepers, may also require separate limits that are independent of background noise (e.g. Lmax in specific octave or third-octave frequency bands – and that should not be allowed to occur regularly at night).”*

The applicant fails to include setting specific noise limits passed on maximum noise levels, rather than average noise levels, as required in the Mineral extraction Guidance 2014.

- the Minerals Extraction Guidance 2014 states that time after 10pm is night-time and that a noise limit should not exceed 42dB(A) LAeq,1h (free field).
- The Minerals Extraction Guidance also states that the developer should *“monitor the resulting noise to check compliance with any proposed or imposed conditions.”* the Applicant has failed to meet this requirement and has failed to propose tolerable maximum levels of impulsive and tonal noise for both day and night-time periods.
- The proposed 6:00am earlier starting time is normally regarded as night-time operations.

**5.0 Incomplete assessment**

The noise reports in general, for both train movements and aggregate unloading, fails to encompass the future circumstance of the operation of Appleford Sidings. The proposal by OCC to construct a road bridge over Appleford sidings will significantly change the noise environment within the period to be covered by this planning application to extend working hours. Therefore, any predictive or modelling noise impacting on dwellings facing Appleford sidings must include the conditions with and without a bridge in place. An assessment with the bridge in place must include the cumulative impact of road traffic, shunting trains around the sidings, the capacity of the bridge structure to reflect rail sound. The vibration and ground borne sound due to the imposed structures also need to be accounted for.

**6.0 Failure to comply with planning conditions**

Planning condition 3 (Application No: MW.0028/17) state that *“The level of noise emitted from the site shall not exceed those set out in the Sutton Courtenay Train Unloading Noise Assessment (Ref. 403.00027.00432 Version 2) prepared by SLR Global Solutions dated June 2016 when measured at the nearest residential façades at Chambrai Close, Appleford and Bridge House, Appleford.”* In respect of this planning condition Hanson have not demonstrated, by measurement at these receptors, that this planning condition has been complied with for current operating hours.

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**APPLEFORD-ON-THAMES PARISH COUNCIL**

21 APRIL 2022