

Mortlake High Street SW14 8SN, London

Noise Impact Assessment

14 June 2024

Client: Colliers

Ground Floor
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Please Note

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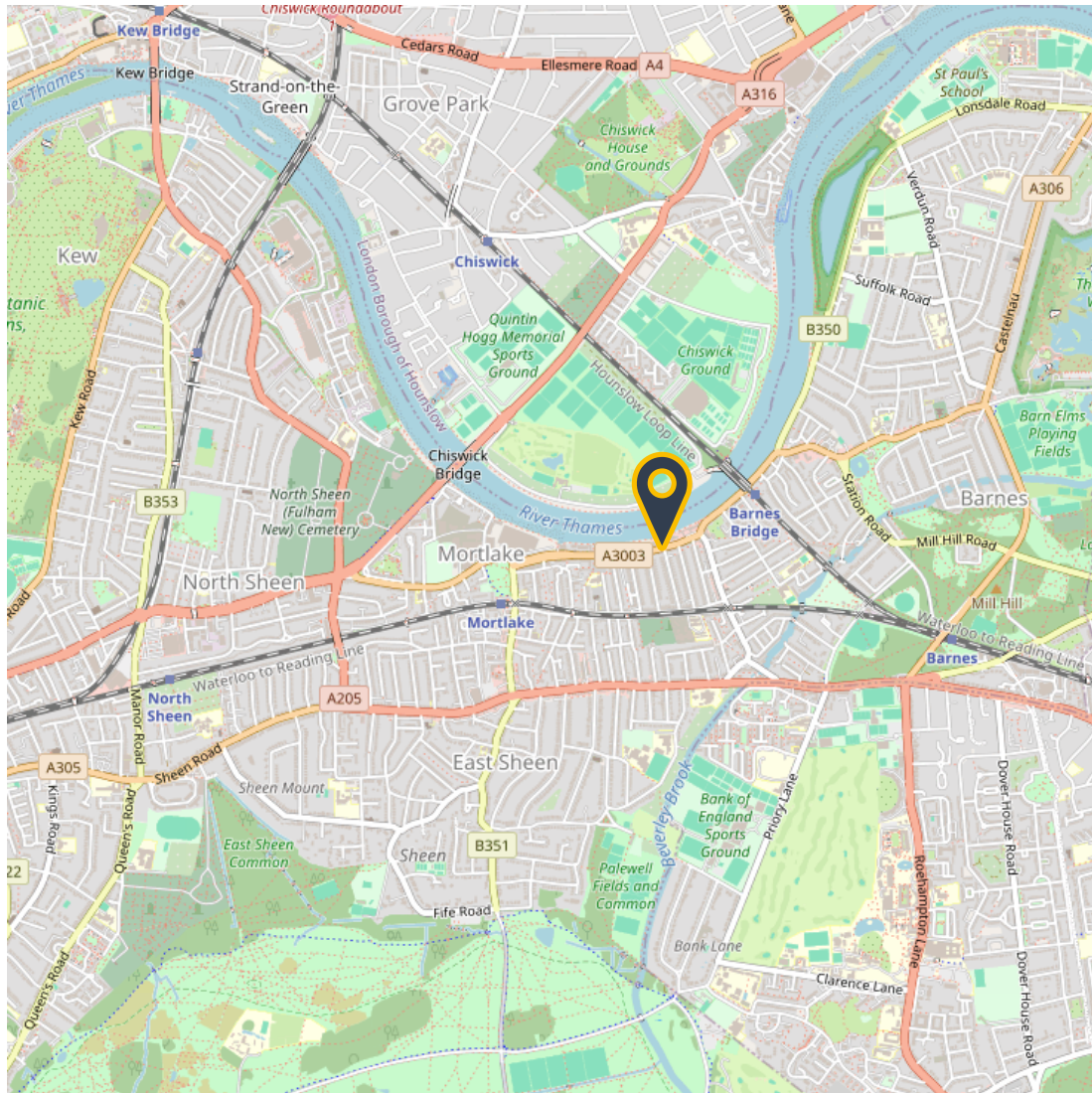
1.0 INTRODUCTION

- 1.1 Quantum Acoustics Ltd has been commissioned by Colliers to prepare this Noise Impact Assessment, which accompanies a prior approval application for the proposed change of use of The Old Fire Station 123 Mortlake High Street, London. The application seeks the change of use of existing office space Class E(g)(i) to create new residential units (Class C3), under Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015, as amended.
- 1.2 With regard to development under Class MA, the matters for which prior approval may be required include *"the impacts of noise from commercial premises on the intended occupiers of the development"*.
- 1.3 This report describes the location of the site and observations regarding neighbouring land uses during a site attendance. It also presents the results of preliminary noise measurements made during that attendance to assist with understanding any noise constraints created by existing, neighbouring commercial uses.
- 1.4 The report then outlines relevant national and local planning policy relevant to noise, prior to discussing the acceptability of the proposed change of use from a noise impact perspective.

2.0 SITE DESCRIPTION

2.1 The site is located on the north side of Mortlake High Street, as shown below.

Site Location (OpenStreetMap 2024)



- 2.2 The site sits between Mortlake High Street and the Thames Path which runs alongside the River Thames.
- 2.3 Neighbouring land uses are made up of commercial property attached to the east, residential townhouses to the south across Mortlake High Street and residential flats attached to the west (The Limes). Commercial property to the east includes Class E(g)(i) office, and Class E(b) restaurant.
- 2.4 The site lies within the jurisdiction of the London Borough of Richmond upon Thames.

3.0 EXISTING NOISE ENVIRONMENT

- 3.1 As noted earlier, for development under Class MA of the GPDO, the matters for which a requirement for prior approval is required includes *"impacts of noise from commercial premises on the intended occupiers of the development"*.
- 3.2 For the purposes of Class MA, "commercial premises" means any premises normally used for the purpose of any commercial or industrial undertaking which existed on the date of the application and includes any premises licensed under the Licensing Act 2003, or any other place of public entertainment.
- 3.3 An inspection of the building and its environs indicates that adjoining land uses are office Class E(g)(i) and residential Class C3; including offices attached to the east of the building and residential attached to the west. Further offices in Tideway Yard fall within Class E(g)(i) of the Town and Country Planning (Use Classes) Order 1987 (as amended). It is important to note that the definition of this use class includes a note clarifying that such a use is *"a use which can be carried out in any residential areas without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit"*. As such, there should not be any intrinsic incompatibility between existing office and future residential uses.
- 3.4 Notwithstanding the above, it is possible that a noise impact could arise if, for example, an existing office building was serviced by building services plant installations which were adequately controlled in respect of existing residential uses but could give rise to higher noise levels where new residential was introduced in closer proximity.
- 3.5 In order to review any potential adverse impacts, a site attendance was undertaken on 10th June 2024 to form subjective opinions regarding the presence of any commercial related activities and associated noise. During this site attendance, sample noise measurements were also made.

Noise Monitoring Location

3.6 Noise measurements were made at the monitoring location shown below.

Noise Monitoring Location (Google Earth Contributors, 2024)



3.7 The sound level meter was secured at a height of 1.5m above local ground level.

Measurement Instrumentation

3.8 The following measurement instrumentation was used:

Table 3.1: Measurement Instrumentation

Location	Equipment Description	Manufacturer & Model Type	Serial Number
LT1	Sound Level Meter	Convergence nsrt mk4	AnJerX2S8X23KDlyx0DRvD

3.9 A check on the sound level analysers was conducted ahead of the measurements using a handheld sound level calibrator and was checked again on completion. No significant drift in calibration was observed. Calibration certificates for all equipment are available on request.

Measurement Results

3.10 The following sound levels were measured:

Table 3.2: Measurement Results

Monitoring Location	Daytime (07:00 – 23:00)			Night-time (23:00 – 07:00)		
	L _{Aeq}	L ₉₀	L _{AFmax}	L _{Aeq}	L ₉₀	L _{AFmax}
LT1	64dB	49dB	86dB	59dB	35dB	76dB

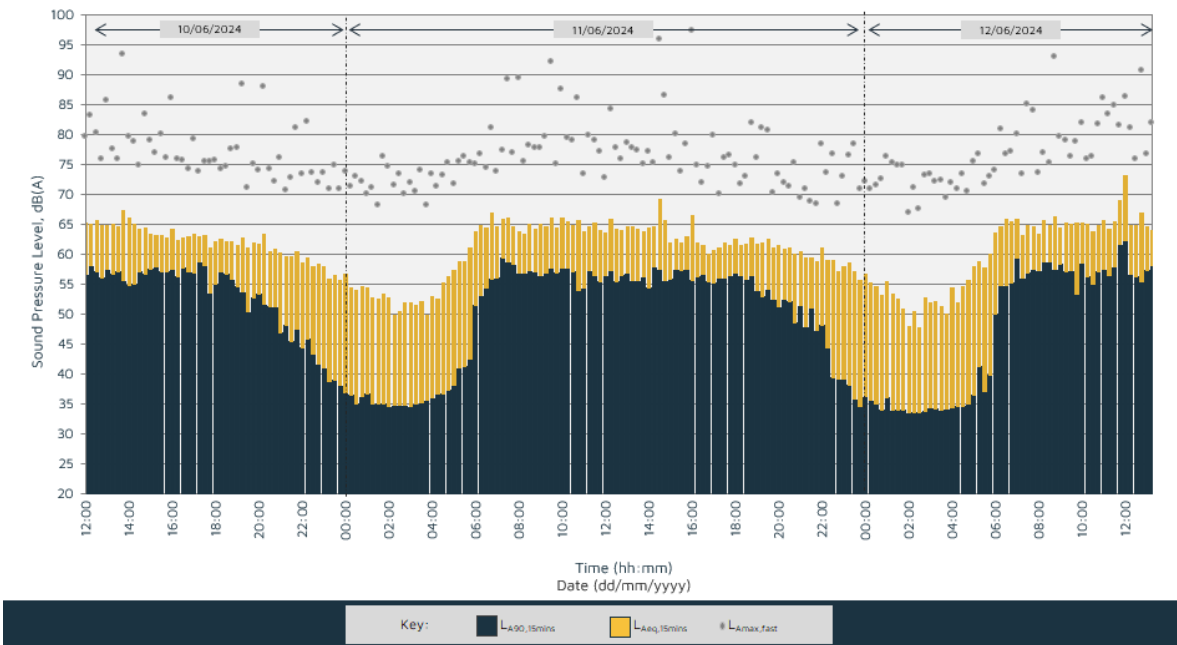
Graph 1

Project: 24211 123 Mortlake High Street

Measurement Location: LT1 Mortlake High Street

Survey Date: 10 to 12 June 2024





Weather

3.11 Weather conditions during the site attendance were generally dry with light winds. These conditions were deemed suitable for the survey.

Observations

3.12 Noise levels at LT1 were dominated by road traffic noise from Mortlake High Street and regular low flying passenger planes from Heathrow Airport.

4.0 PLANNING CONTEXT AND DESIGN GUIDANCE

Preamble

- 4.1 Class MA of the GPDO (as amended) permits the change of use *"of a building and any land within its curtilage from a use falling within Class E (commercial, business and service) of Schedule 2 to the Use Classes Order to a use falling within Class C3 (dwellinghouses) of Schedule 1 to that Order"*, subject to the condition that before beginning the development, the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required.
- 4.2 The matters for which a requirement for prior approval is to be determined includes the *"impacts of noise from commercial premises on the intended occupiers of the development"*.
- 4.3 *"Commercial premises"* means any premises normally used for the purpose of any commercial or industrial undertaking which existed on the date of application and includes any premises licensed under the Licensing Act 2003(a) or any other place of public entertainment.

National Planning Policy Framework

- 4.4 The overarching aim of the planning regime is to ensure sustainable development and the compatibility of land uses. With regard to noise, the National Planning Policy Framework sets out two primary policies which seek to ensure that new noise sensitive development is adequately protected from noise / the impact of noise from new noise generating land uses on existing residential uses is minimised and that existing commercial/industrial uses and community facilities do not have unreasonable restrictions imposed on them by new noise sensitive development:

Paragraph 191

"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the Site or the wider area to impacts that could arise from the development. In doing so they should:

- a) *mitigate and reduce to a minimum potential adverse impact resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*

- b) *identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*
- c) *limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.*

Paragraph 193

"Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."

Noise Policy Statement for England

- 4.5 With regard to 'adverse' impacts and 'significant adverse' impacts, the NPPF directs the reader to the advice contained in DEFRA's "Noise Policy Statement for England" (NPSE). This Policy Statement introduces the concept of a "Significant Observed Adverse Effect Level" (SOAEL), "Lowest Observed Adverse Effect Level" (LOAEL) and "No Observed Effect Level" (NOEL). These are concepts aligned with toxicology outcomes derived from guidance given by the World Health Organisation.

NOEL – No Observed Effect Level

This is the level below which no effect can be detected and below which there is no detectable effect on health and quality of life due to noise.

LOAEL – Lowest Observable Adverse Effect Level

This is the level above which adverse effects on health and quality of life can be detected.

SOAEL – Significant Observed Adverse Effect Level

This is the level above which significant adverse effects on health and quality of life occur.

Planning Practice Guidance

- 4.6 The application of national planning is highlighted in the government's "National Planning Practice Guidance" (NPPG). This seeks to help clarify understanding the perception of noise effects, outcomes and actions that should be taken to align decision making with the NPPF. In line with

the NPPF concept of basing decision making on the identification of “significant” or “other” impacts on health and quality of life, the NPPG aligns its guidance with the NPSE. Table 4.1 below summarises this guidance.

Table 4.1: Noise Exposure Hierarchy Table

Response	Examples of Outcomes	Increasing Effect Level	Action
No Observed Effect Level (NOEL)			
Not present	No effect	No Observed Effect	No specific measures required
No Observed Adverse Effect Level (NOAEL)			
Present and not intrusive	Noise can be heard but does not cause any change in behaviour or attitude. Can slightly affect the acoustic character of the area but not such that there is a perceived change in the quality of life.	No Observed Adverse Effect	No specific measures required
Lowest Observed Adverse Effect Level (LOAEL)			
Present and intrusive	Noise can be heard and causes small changes in behaviour and/or attitude, e.g. turning up volume of television; speaking more loudly; where there is no alternative ventilation, having to close windows for some of the time because of the noise. Potential for some reported sleep disturbance.	Observed Adverse Effect	Mitigate and reduce to a minimum
Significant Observed Adverse Effect Level (SOAEL)			
Present and disruptive	The noise causes a material change in behaviour and/or attitude, e.g. avoiding certain activities during periods of intrusion; where there is no alternative ventilation, having to keep windows closed most of the time because of the noise. Potential for sleep disturbance resulting in difficulty in getting to sleep, premature awakening and difficulty in getting back to sleep. Quality of life diminished due to change in acoustic character of the area.	Significant Observed Adverse Effect	Avoid
Present and very disruptive	Extensive and regular changes in behaviour and/or an inability to mitigate effect of noise leading to psychological stress or physiological effects, e.g. regular sleep deprivation/awakening; loss of appetite, significant, medically definable hard, e.g. auditory and non-auditory.	Unacceptable Adverse Effect	Prevent

4.7 Paragraph 016, Reference ID: 30-016-20190722 states:

"Does this Guidance apply to developments that fall under the Permitted Development Regime?"

The principles of this guidance can be used to assist in fulfilling the 'prior approval' requirements with regard to noise management found in Regulations such as the Town and Country Planning (General Permitted Development) (England) Order 2015 (SI 2015/596) as amended".

BS 8233:2014

4.8 Guidelines selected for internal ambient noise levels for dwellings are contained within Table 4 of BS 8233:2014 shown below.

BS 8233:2014 Table 4: Internal Ambient Noise Levels for Dwellings

Activity	Location	07:00 – 23:00 hrs	23:00 – 07:00 hrs
Resting	Living room	35 dB L _{Aeq,16hour}	-
Dining	Dining room / area	40 dB L _{Aeq,16hour}	-
Sleeping (daytime resting)	Bedroom	35 dB L _{Aeq,16hour}	30 dB L _{Aeq,8hour}

Local Planning Policy

4.9 The application of national planning is highlighted in the government's *"National Planning Practice Guidance"* (NPPG). This seeks to help clarify understanding the perception of noise effects, outcomes and actions that should be taken to align decision making with the NPPF. In line with the NPPF concept of basing decision making on the identification

4.10 The London Borough of Richmond upon Thames adopted the local plan on 3rd July 2018. The Borough Local Plan helps decide the outcome of planning applications for land development in Richmond, including change of use applications.

4.11 Policy LP 10 deals local environment impacts, pollution and land contamination:

POLICY LP 10 – Noise and Vibration

C. The council encourages good acoustic design to ensure occupiers of new and existing noise sensitive buildings are protected. The following will be required, where necessary:

- 1. a noise assessment of any new plant and equipment and its impact upon both receptors and the general background noise levels;*
- 2. mitigation measures where noise needs to be controlled and managed;*
- 3. time limits and restrictions for activities where noise cannot be sufficiently mitigated;*
- 4. promotion of good acoustic design and use of new technologies;*
- 5. measures to protect the occupiers of the new developments from existing sources.*

4.12 Together with the Borough's Local Plan, a supplementary planning document titled 'Development Control for Noise Generating and Noise Sensitive Development' mentions that internal noise levels are expected to achieve the values contained in Table 4 of BS 8233:2014.

5.0 ASSESSMENT

- 5.1 A visual inspection of the site and attended noise monitoring did not indicate any existing commercial sources of noise that would have an adverse or significant adverse effect on future occupiers.
- 5.2 The dominant noise sources characterising the site are traffic noise from Mortlake High Street and low flying planes arriving/departing Heathrow Airport. As noted earlier, such transportation noise does not fall within the consideration of an application under Class MA of the GPDO (as amended) and the proposed change of use is therefore deemed acceptable on noise grounds.
- 5.3 The absence of any dominant commercial noise will also satisfy with the "*agent of change*" principle developed in paragraph 193 of the NPPF, i.e. the proposed residential use can be integrated effectively with existing business and community facilities.
- 5.4 In addition to the above, it is worth noting again that buildings directly adjoining the site have Class C3 and Class E(g)(i) (office) use, the definition of which intrinsically supports their ability to satisfactorily co-exist with residential uses.
- 5.5 Notwithstanding the above, it is clearly important that future occupants of flats created by a material change of use are afforded acceptable levels of aural amenity. If considered necessary, the provision of acceptable internal living conditions could be secured through the use of a planning condition attached to any prior approval consent.

6.0 CONCLUSIONS

- 6.1 A site inspection of The Old Fire Station 123 Mortlake High Street and neighbouring land uses has been undertaken.
- 6.2 Sample environmental noise measurements have been undertaken to help quantify the significance of the existing noise environment and whether such noise is of a magnitude to have the potential for adverse or significant adverse effects on the future residential occupants of the building.
- 6.3 Existing noise levels at the site were found to be dominated by road traffic noise. No significant sources of commercial noise were identified.
- 6.4 It is therefore concluded that the principle of a change of use from offices to residential does not raise any particular acoustic concern in relation to the future occupants of dwellings that would be created.
- 6.5 It is also considered material to note that buildings immediately neighbouring the site have residential and office use. This intrinsically supports their ability to satisfactorily co-exist with other residential uses.
- 6.6 In such circumstances, the proposed change of use would also not create any conflict with the agent of change principle created in paragraph 193 of the NPPF.
- 6.7 Notwithstanding the above, it is clearly important that future occupants of flats created by a material change of use are afforded acceptable levels of aural amenity, e.g. due to noise intrusion from other sources of environmental noise (e.g. road and railway traffic). If considered necessary, such impacts could be readily controlled through the imposition of an appropriate condition requiring the implementation of an appropriate scheme of sound insulation.
- 6.8 It is therefore concluded that the proposed change of use of The Old Fire Station 123 Mortlake High Street to provide residential accommodation is in accordance with national and local planning policy aims relevant to noise and does not raise any noise impact concerns in relation to the specific noise impact considerations of the GPDO prior approval process.



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