



Our ref: Z43286

Date: 2nd February 2023

Planning, Building Control and Licensing
Growth and Development
Manchester City Council
PO Box 532
Town Hall Extension
Manchester
M60 2LA

**Environmental Noise Assessment for Planning
Stockport Road | Discharge of Condition 16 (Acoustics)**

Dear Sir/Madam,

Further to the email response sent to Mike Bagot of Rowlinson Constructions, we have been forwarded to provide a response on behalf of our client Rowlinson Constructions. For clarity the response from MCC's EHO is as follows:

"I have received comments from Environmental Health officers advising that in order for them to be able to support the discharge do condition no.16, the applicant should assess at least 10% of the apartments and provide verification information for them. At this time an insufficient number of apartments have been assessed. Please can you therefore provide further verification assessments for consideration."

Our response to the above is as follows:

The Noise and Planning guidance the EH officer refers to on the MCC website is dated October 2022, which is after the planning application was determined. This guidance significantly post dates the date of planning determination – in effect Rowlinson's are being asked to adhere to guidance that did not exist at the time of planning consent. We have reviewed MCC's Noise and Planning Guidance dated 2015 and there is no mention of testing 10% of rooms. We therefore conclude that the requirements being asked for did not exist at the time of planning determination and were only introduced in the Oct 2022 guidance. Our view is that the MCC noise and planning guidance applicable at the point of receiving planning consent should apply. In this case the 2015 version is applicable. This is standard practice and would be applicable to all other planning policies that are applicable at the date of receiving consent. Had Rowlinson known of the new guidance they could have included for the work, costed for the additional noise monitoring and accommodated within their construction handover programme. Furthermore we understand that the building is now occupied and it would be impossible for us to undertake further noise monitoring over 24hr periods within an occupied building. In the circumstances we would kindly request that the condition is discharged based on the 2015 guidance as the scheme adheres to this.

With respect to the Noise and Planning Guidance Oct 2022, which should not be applied to this scheme for reasons highlighted above, we believe that 10% of rooms requiring noise break in testing is not typical for other Local Authorities and will lead to long and protracted testing regimes which will significantly impact new developments and their handover. We appreciate that there the new planning guidance is designed perhaps tighten up and protect residents and avoid future noise complaints but we feel there will need to be some dialogue between MCC and Acoustic Consultancies (such as ourselves) to review the implications, practicalities and reasoning for undertaking this amount of testing.

To undertake internal noise monitoring for noise break-in typically requires 24hrs of unmanned noise monitoring per room. It needs to cover sufficient monitoring during the day (7am-11pm) and night-time periods (11pm-7am). By room we refer to living areas and bedrooms, which are the two rooms covered under a Noise Impact Assessment (NIA). The noise monitoring must be undertaken at the end of a project usually just before handover as this is the only time the Construction site is almost finished and is not having construction work undertaken. Noise monitoring within a recently constructed room/ dwelling is measuring the break in noise, usually from external noise sources such as traffic, trains or industrial. This means that on this block of 96 apartments, using the 10% room requirement the contractor/ developer will require 10

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dwelling (20 rooms) to be noise monitored. This would require two sets of calibrated noise monitoring equipment operating continuously for a minimum of 10 full days prior to being occupied. It could take much more time if it's raining, or if external works outside our control (such as road improvement with diggers/ compactors etc) are operating directly adjacent to the building being monitored for noise break-in. The requirements will significantly impact commissioning and handover times. Furthermore, it is typical that the façade of an apartment block is consistent in design and specification across an entire elevation and therefore the question is why 10% testing would be needed if all the plots are passing? Also, if a flat was meeting the conditioned NIA criteria then why is it necessary to undertake protracted noise break-in monitoring when the entire façade is the same construction? Furthermore, in our experience the workmanship issues associated with say party walls or floors (sound insulation testing) tend to be more significant than those associated with factory manufactured glazing which tends to control the sound insulation of a façade.

Even if we could undertake further noise monitoring on this building it cannot be done when the building is fully occupied with persons living in the apartments, as is the case now. Aside from the intrusion associated with noise monitoring and privacy issues, the noise being monitored would be people going about their daily lives within their flat and noise from surrounding flats and break-in noise. It would not be possible to isolate the various noise sources at this stage without decanting the building.

We are not intending to pick apart the Noise and planning Oct 2022 guidance, indeed we see it as a useful improvement, but we would welcome further comment and dialogue from MCC to address our concerns on future schemes.

Yours sincerely,

On Behalf of Azymuth Acoustics UK

M Gibson
Director

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