

Hello Gareth,

I have started today at Lewisham and will be undertaking Planning Consultations, predominantly in respect of acoustics, on behalf the Environmental Protection Team. For expediency, whilst I sort out email sign offs etc. I am responding in respect of:

**DC/22/129789 | Demolition of existing buildings and redevelopment of the site comprising a block rising to 5/6 storeys accommodating 1,401sqm of employment floorspace (Use Classes E(g)(i)(ii)(iii)) at ground and mezzanine floors and 60 residential units (Use Class C3) above, with associated landscaping, amenity areas, cycle, car parking and refuse/recycling stores at 21- 57 Willow Way, London, SE26 | 21- 57 WILLOW WAY, LONDON, SE26 4QP**

I note the acoustic submission prepared by 24 Acoustics ref. R9784-1 Rev 1 which reports at Section 5.8:

‘External communal amenity spaces are proposed on the east side of the new building at ground floor level and in three roof terrace areas on the fourth floor. The noise measurement results indicate that external noise levels within all the communal amenity spaces would be comfortably below 55 dB LAeq, 16 hour and therefore acceptable’.

However, from the data presented at Table 1 - Measured Noise Levels at Location 1 – Overlooking High Street the representative daytime (LAeq16hr) is reported as 59dB i.e. in excess of the value above. Further, with the Planning Statement dated 20th December 2022 states:

‘The amenity space provided for the residential element of the Proposed Development comprises private balconies for each unit plus communal open space located on the 4th floor’.

As such is it possible to seek clarification from the Applicant’s Acoustic Consultant as to why it appears the data presented in Table 1 has been ‘screened out’ and reliance placed upon the data presented in Table 2 or provide details of any additional mitigation measures proposed.

Moving on, Section 5.11 of the acoustic submission states:

‘The daytime and night-time plant noise level criteria, for new plant associated with the development, are shown in Table 5 below’.

It would appear this is a typo and should refer to Table 4. However, it is unclear the basis of the Plant Noise Limits presented i.e. are the lowest values or representative L90 values used to derive the values.

Whilst I have no adverse comment in respect of the Mitigation and Glazing albeit, I would also seek to condition internal noise levels for the proposed MVHR, in the absence of clarity in respect of the matters raised above I am currently unable to comment further at present.

Regards

Hedley Pugh (Dr)  
Chartered Environmental Health Officer

Good morning Gareth,

**DC/22/129789 | Demolition of existing buildings and redevelopment of the site comprising a block rising to 5/6 storeys accommodating 1,401sqm of employment floorspace (Use Classes E(g)(i)(ii)(iii)) at ground and mezzanine floors and 60 residential units (Use Class C3) above, with associated landscaping, amenity areas, cycle, car parking and refuse/recycling stores at 21-57 Willow Way, London, SE26 | 21- 57 WILLOW WAY, LONDON, SE26 4QP**

I note the acoustic submission prepared by 24 Acoustics ref. R9784-1 Rev 1 and dated 16th December 2022 and recommend the following conditions be attached to any consent:

### **Noise Protection Scheme**

Façade sound insulation shall be of a standard to achieve noise levels within bedrooms and living rooms of the residential dwellings as recommended in Table 4 of BS 8233:2014 'Guidance on sound insulation and noise reduction for buildings'. Where achieving the recommended internal levels requires windows to be closed shut then alternative ventilation, as necessary shall be provided.

Details of the final glazing fabrication and acoustic specifications shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development and shall be installed prior to occupation of the relevant part of the development and be so maintained.

In respect of any mechanical plant I recommend the following:

### **Mechanical Services Noise Control Condition**

(a) The rating level of the noise emitted from fixed plant on the site shall be 5dB below the existing background level at any time. The noise levels shall be determined at the façade of any noise sensitive property. The measurements and assessments shall be made according to BS4142:2014.

(b) Details of a scheme complying with paragraph (a) of this condition shall be submitted to and approved in writing by the local planning authority prior to first installation.

(c) The development shall not be occupied until the scheme approved pursuant to paragraph (b) of this condition has been implemented in its entirety. Thereafter the scheme shall be maintained in perpetuity.

In respect of the separating elements between commercial and residential I recommend the following:

## **Noise Impact on Structurally Adjoining Properties/Premises**

(a) No development beyond piling shall commence until full written details, including relevant drawings and specifications of the proposed works of sounds insulation against airborne noise to meet  $D'nT,w + Ctr$  dB of not less than 55 for walls and/or ceilings where residential parties non domestic use shall be submitted to and approved in writing by the local planning authority.

(b) The development shall only be occupied once the soundproofing works as agreed under part (a) have been implemented in accordance with the approved details.

(c) The soundproofing shall be retained permanently in accordance with the approved details

Whilst I note the submitted outline construction and Environmental Management Plan prepared by Kitewood Estates dated December 2022 I would recommend the following condition be attached to any consent:

### **Construction Environment Management Plan**

No development (excluding demolition and required below ground works circa. 1 meter) shall commence on site until such time as a Construction Management Plan, in general accordance with the Outline Construction Logistics Plan (prepared by Kitewood Estates dated December 2022) has been submitted to and approved in writing by the local planning authority. The Plan shall cover:

(a) Dust mitigation measures with regard to Mayor's "Control of Dust and Emissions During Construction and Demolition" (SPG) dated July 2014

(b) The location and operation of plant and wheel washing facilities

(c) Details of best practical measures to be employed to mitigate noise, Vibration arising out of the construction process

(d) Details of construction traffic movements including cumulative impacts which shall demonstrate the following:-

- (i) Rationalise travel and traffic routes to and from the site.
  - (ii) Provide full details of the number and time of construction vehicle trips to the site with the intention and aim of reducing the impact of construction relates activity.
  - (iii) Measures to deal with safe pedestrian movement.
- (e) Security Management (to minimise risks to unauthorised personnel).

(f) Details of the training of site operatives to follow the Construction Environment Management Plan requirements.

(g) An Operational Unexploded Ordnance (UXO) Emergency Response Plan

Moving on to matters relating to contaminated land I note the findings of the Phase I Desk Study and Site Reconnaissance prepared by Leap Environmental Limited Report Reference: LP3169 dated 19<sup>th</sup> December 2022 and recommend and recommend the following condition be attached to any consent:

### **Contaminated Land**

(a) No development (including demolition of existing buildings and structures) shall commence until each of the following have been complied with:-

- i. The recommendations within the submitted Phase I Desk Study and Site Reconnaissance prepared by Leap Environmental Limited Report Reference: LP3169 dated 19<sup>th</sup> December 2022 for Intrusive Ground Investigation have been undertaken a to fully characterise and risk assess the site which shall include the gas, hydrological and contamination status, specifying rationale; and recommendations for treatment for contamination encountered (whether by remedial works or not) has been submitted to and approved in writing by the Council.
- ii. The required remediation scheme implemented in full.

(b) If during any works on the site, contamination is encountered which has not previously been identified (“the new contamination”) the Council shall be notified immediately and the terms of paragraph (a), shall apply to the new contamination. No further works shall take place on that part of the site or adjacent areas affected, until the requirements of paragraph (a) have been complied with in relation to the new contamination.

(c) The development shall not be occupied until a closure report has been submitted to and approved in writing by the Council. This shall include verification of all measures, or treatments as required in (Section (a) i & ii) and relevant correspondence (including other regulating authorities and stakeholders involved with the remediation works) to verify compliance requirements, necessary for the remediation of the site have been implemented in full.

The closure report shall include verification details of both the remediation and post-remediation sampling/works, carried out (including waste materials removed from the site); and before placement of any soil/materials is undertaken on site, all imported or reused soil material must conform to current soil quality requirements as agreed by the authority. Inherent to the above, is the provision of any required documentation, certification and monitoring, to facilitate condition requirements.

Finally, I have also copied this email to Sefkan who deals with issues around air quality in the event further comment in this regard is required.

Hedley Pugh (Dr)

Chartered Environmental Health Practitioner  
Environmental Protection Team  
Public Realm  
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Lewisham Council