

NORTH HERTS COUNCIL

MEMORANDUM

To: PLANNING CONTROL AND CONSERVATION Melissa Tyler	From: ENVIRONMENTAL HEALTH Alan Stone Ext 4108
	Date: 15 th December 2025
Our Ref: 6470/25	Your : 25/02816/FP Ref:
Subject: Noise and other nuisances, AQ and CL Full Planning Permission: Erection of two detached dwellings and one detached garage to serve plot 2 following demolition of existing detached garage including parking, landscaping and extension of existing vehicular access off Stevenage Road (existing vehicular access off Sperberry Hill permanently made redundant). Ryefield, Stevenage Road, St Ippolyts, Hitchin, Hertfordshire, SG4 7PE	

Comments:

Thank you for consulting Environmental Protection on this application.

I make the following comments.

Noise:

The application is not supported by a noise assessment, but noise is mentioned in the planning statement. It draws conclusions from a noise assessment done some time ago for an adjacent development and suggests that standard double glazing should be sufficient to mitigate noise.

I have passed the information and application details to UK power networks and the National Grid. The National Grid responded with the following comments:

From: William Lowe <William.Lowe@nationalgrid.com>

Sent: 12 December 2025 16:17

To: Alan Stone <Alan.stone@north-herts.gov.uk>

Subject: Development proposal near to Little Wymondley Substation - NGET

Dear Mr Alan Stone,

By way of introduction my name is William Lowe and I work as an Acoustician for National Grid

Electricity Transmission (NGET) and I am writing to you as a technical representative of NGET in

regards to a Planning Application, current awaiting a decision, at Land off Stevenage Road SG4 7PE

(Planning Ref: 25/02816/FB).

I was made aware of this Planning Application by Steve Ninham at UKPN, who I understand you contacted on the 10th of December welcoming any comments on the proposed scheme.

I understand the Full Planning Application seeks approval for 2 x new dwellings.

I have reviewed the publicly accessible documents that have been submitted in support of the Planning Application, including the Planning, Design and Access statement (PDAS) prepared by Sworders Ltd. I note no Noise Assessment has been completed or submitted in support of the proposed development.

The PDAS highlights that Wymondly Substation was identified by North Hearts Council as a noise generating development as part of the Pre App response (ref: 4/02649/PRE). The PDAS highlights that an approved Planning Application, adjacent to the site (planning ref: 19/01669/FP), was supported by a Noise Assessment, completed by Auracle Acoustics in May of 2019. The PDAS suggests that providing the proposed development utilises standard thermal double glazing (as proposed in the adjacent application), noise levels will be suitable controlled in line with the guidance presented in BS8233. This places reliance on the findings of the Noise Assessment completed by Auracle Acoustics and assumes that 'standard thermal double glazing' will be suffice to ensure future residents of the proposed development will not be impacted by noise from Wymondly Substation. I find this conclusion to be particularly lax and poses some risk to both future residents of the proposed development and to the general operation of Wymondly Substation for the reasons set out below:

- Residual and Background noise levels have been calculated by post processing the contemporaneous audio recordings, applying notch filters and removing frequencies of 100 Hz and multiples of, to account for substation noise. Whilst it is technically correct that the substations are dominant at 100 Hz and all higher order harmonics (i.e. 100 Hz, 200 Hz, 300 Hz etc), the approach adopted by Auracle Acoustic to determine the residual and background noise level does not accord with the guidance presented within BS4142. As the residual and background noise levels were influenced by substation noise, measurements should have been taken when the specific noise was absent. As substations operate continuously,

measurements should have been conducted at a proxy location where ambient noise levels represent those of the site without substation noise i.e. the residual noise level.

- Paragraph 3.3 of the report states that the specific noise levels have been calculated by “logarithmically subtracting the background noise levels from the noise monitoring results that include noise from all sources.” This is technically incorrect, instead specific noise levels should be calculated by logarithmically subtracting the residual noise level from the ambient noise level (i.e. $L_s = 10\log_{10}(10^{L_a/10} - 10^{L_r/10})$). Applying the correct methodology would yield a higher specific noise level (approx. 5 dBA higher) which should have formed the basis of the assessment. It is also worth noting that even when following the methodology presented in section 3.3, the numbers simply don’t add up and without reviewing the data noted to be presented in the appendices (not included on the downloaded version of the Noise Assessment), I unfortunately cannot understand how these specific noise levels have been calculated.
- The report completed by Auricle Acoustics also indicates that dwellings would be required to have MVHR, likely made following the guidance presented in AVOG. New standards have since been published (Approved Document O (with effect in November 2024)) which should be considered as part of any Noise Assessment completed for this proposed development to protect future occupants from noise and overheating.
- Paragraph 6.36 of The Planning, Design and Access Statement suggests that “both this application and the one for the adjacent site have been designed to comply with BSI Standards Publication BS 8233:2014 ‘Guidance on sound insulation and noise reduction for buildings’” – there is however not evidence of the proposed development being designed to achieve the internal limits set out within BS8233, as a Noise Assessment has not been completed in support of the proposed development one cannot accurately determine how noise, specifically operational noise from Wymondly Substation, has been assessed and address within the proposed schemes design.
- No reference has been made to BS4124, or the Agent of Change Principle which unless considered within a Noise Assessment, could pose risks to both future residents and NGET.

In light of the above, it is my view that the proposed development cannot rely on the findings of the noise report submitted as part of the adjacent development planning ref: 19/01669/FP to inform the design of the proposed scheme. This is bad practice, and would place both NGET and future occupants of the site at undue risk.

NGET are not opposed to the development, however we do need to ensure that where development is proposed within proximity to National Grid infrastructure, noise is properly considered to protect future residence and the operations of our business.

I would therefore recommend the proposed development to be approved with a condition applied which would require the developer to complete a Noise Assessment in accordance with BS8233 and BS4142, and which should address the Agent of Change Principle.

Kind Regards,

William Lowe, MIOA

Environmental Engineer (Acoustics)

Electricity Transmission

Nationalgrid'

Given the circumstances outlined in this email, I am minded to agree and suggest that either a noise impact assessment is produced for this development (with new noise data and applying current and appropriate standards and guidance) and submitted 'up front'. Or, as the email above sets out, that a noise assessment is required via a suitably worded condition. I have drafted a condition below for your consideration.

No development hereby approved shall commence until a suitable Noise Assessment has been undertaken, submitted to and approved in writing by the Local Planning Authority. The Noise Assessment shall identify all potential sources of noise likely to impact on the site, and assess them in accordance with relevant procedures and standards. The results will be reported in writing to the Local Planning Authority, and the report shall identify suitable measures to control noise impacts on future occupiers of the development. The development shall be carried out in accordance with the approved noise mitigation details prior to the first occupation of the permitted dwelling.

Reason: To protect the amenity of any future occupiers

Land Contamination:

The application is not supported by any information on land contamination report. Given the site and location, I have no objections to this but recommend that the following condition is placed on any decision notice should you be minded to grant approval.

Any contamination that is found during the course of construction of the development permitted shall be reported immediately to the local planning authority. Development on the part of the site affected shall be suspended and a risk assessment carried out and submitted to and approved in writing by the local planning authority. Where unacceptable risks are found remediation and verification schemes shall be submitted to and approved in writing by the local planning authority. These approved schemes shall be carried out before the development is resumed or continued.

Local Air Quality:

North Herts Council have specific air quality planning guidance that can be found at <http://www.north-herts.gov.uk/home/environmental-health/pollution/air-quality/air-quality-and-planning>

Application of the guidance to a development of this scale and location defines the site as being a MINOR scale development and so the following condition is recommended to ensure that appropriate local air quality mitigation is provided.

EV Recharging Infrastructure Condition

Prior to occupation, each of the new dwellings shall incorporate an Electric Vehicle (EV) ready domestic charging point.

Reason: To contribute to the objective of providing a sustainable transport network and to provide the necessary infrastructure to help off-set the adverse impact of the operational phase of the development on local air quality.

Informative

1) EV Charging Point Specification:

A charging point shall be installed by an appropriately certified electrician/electrical contractor in accordance with the following specification. The necessary certification of electrical installation should be submitted as evidence of appropriate installation to meet the requirements of Part P of the most current Building Regulations.

Cable and circuitry ratings should be of adequate size to ensure a minimum continuous current demand for the vehicle of 16A and a maximum demand of 32A (which is recommended for Eco developments)

- A separate dedicated circuit protected by an RBCO should be provided from the main distribution board, to a suitably enclosed termination point within a garage or an

accessible enclosed termination point for future connection to an external charge point.

- The electrical circuit shall comply with the Electrical requirements of BS7671: 2008 as well as conform to the IET code of practice on Electric Vehicle Charging Equipment installation 2012 ISBN 978-1-84919-515-7 (PDF). This includes requirements such as ensuring the Charging Equipment integral protective device shall be at least Type A RCD (required to comply with BS EN 61851 Mode 3 charging).
- If installed in a garage all conductive surfaces should be protected by supplementary protective equipotential bonding. For vehicle connecting points installed such that the vehicle can only be charged within the building, e.g. in a garage with a (non-extended) tethered lead, the PME earth may be used. For external installations the risk assessment outlined in the IET code of practice must be adopted, and may require additional earth stake or mat for the EV charging circuit. This should be installed as part of the EV ready installation to avoid significant on cost later.
- A list of authorised installers (for the Government's Electric Vehicle Homecharge Scheme) can be found at <https://www.gov.uk/government/organisations/office-for-low-emission-vehicles>
- UK Government issued legislation in 2021 to require domestic EV charge points to be smart, thus we recommend that all charge points will be capable of smart charging, as detailed in UK Gov regulations.

2) The above condition is considered relevant and reasonable for the following reasons:

- Paragraphs 170 (e), 181 of the NPPF, which refer to the effects (including cumulative effects) of pollution (including air pollution) on health, the natural environment (including air quality).
- Paragraphs 102 (d), 105 (e) and 110 (e) of the NPPF, which refer to the need to promote sustainable transport including the provision for charging plug-in and other ultra low emission vehicles.
- HCC Local Transport Plan (LTP4) 2018-2031 which includes an objective to 'preserve the character and quality of the Hertfordshire environment' and 'make journeys and their impact safer and healthier', as well as its Emissions Reduction Policy 19.
- It is consistent with the approach specified in the NHDC Air Quality Planning Guidance Document, which is referenced within the current consultation version of the Local Plan.

Regards
Alan Stone