Leedham, Scott

From: Goodier, Melanie
Sent: 12 October 2026 11:35
To: Godson, Rebecca; Shaw, Alex
Cc: Development
Subject: RE: AVA/2026/0388 - Installation of plant and new shopfront at former bank for Gregg's at 31B King Street, Belper (Our Ref. 26/10690/PL01)
Attachments: 1148-R01-V0.pdf; A5897 - Greggs - 31B King Street, Belper, Derbyshire (O).pdf

Hello Rebecca,

In my previous comments (27.08.2026 & 02.09.2026), I requested clarification on whether the proposed plant would replace the existing ACUs on the rear elevation, the proposed location (ground level or mounted on the flat roof) and the method of extraction of any cooking odours. The applicant has confirmed (below) that existing plant would be replaced by the proposed plant in the location shown on the drawing and submitted the attached odour and noise assessments.

Noise
The 'Noise Impact Assessment Report for Proposed Building Services Plant and Equipment' (1148-R01-V0, DG Acoustics, 04.09.2026) assesses the likely impact of noise emissions from the proposed external plant (Table 3.1) comprising two ACUs, an external discharge grille associated with the oven extract and a WC extract grille at the rear of the building (Figure 3.2).

The assessment, carried out in accordance with BS 4142:2014+A1:2019, compares existing background levels, measured for a 24-hour period from 10:00 on Thursday 03.09.2026, with the manufacturers' overall sound level data for the highest operational mode (heating). As frequency spectra were unavailable, the report uses data from comparable units (Table 3.2). The proposed building services plant is likely to operate beyond the proposed retail hours (06:30-18:00 Mondays to Fridays, 07:00-18:00 Saturdays and 08:00-17:00 Sundays) so the assessment considers operating hours of 05:30-19:00 (paragraph 4.17). Early morning operations prior to 07:00 fall within the 'night-time' period so are most likely to cause disturbance to the nearest noise-sensitive receptors (NSRs), although the existing buildings and parapet wall above the flat roof provide some screening:



Figure 3.3: Closest identified noise-sensitive receptor relative to the proposed plant and equipment

The BS 4142 Assessment (Table 5.2 & Appendix E), based on the measured modal background level for the whole operational period of 43dB LA90 and the calculated combined specific sound level for all plant of 37dB LAeq (operating simultaneously at maximum duty), produces a Rating Level **-6dB** below the representative background level. BS 4142 advises:

> 'The lower the rating level is relative to the measured background sound level, the less likely it is that the specific sound source will have an adverse impact or a significant adverse impact. Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context.'

The Assessment therefore indicates that the proposed external plant would have a '**low impact**' (depending on the context).

Odour

The 'Odour Impact Assessment' (A5897/O/01, ACCON UK Ltd., 04.09.2026) assesses the likely impact of odour emissions from the proposed external discharge grille associated with the oven extract at the rear of the building.

The assessment, carried out with reference to guidance in the 'Control of Odour and Noise from Commercial Kitchen Exhaust Systems' (2nd Edition, Ricardo EMAQ+, 06.05.2022) considers previous ACCON odour assessments (sniff tests) for the product range (baking, cooking/warming bacon and sausages etc. – no frying or open grilling takes place) and Greggs' standard odour controls. Although the 2nd Edition was replaced by the 3rd Edition (20.05.2026), the Risk Assessment for Odour, which provides a score methodology to determine odour control requirements using a simple risk assessment approach, is not fundamentally altered. The report states that the initial risk assessment indicates a potential '**High Impact Risk**' without mitigation (Table 2.1 & Appendix 4).

Section 2.5 therefore describes an odour control scheme to provide the required 'high level odour control', achieved by dispersion and arrestment, appropriate to Greggs' product range to minimise the potential for odour nuisance:

Based on the information provided and identified in **Appendix 2**, the proposed Greggs shop will utilise:

- 315mm diameter ducting
- ELTA Mixed Flow Fan, SEL355/2-1AC (Single Phase);
- Longar, Type 4 - TYPE4GLV59759745 (597 x 597 x 45) - Galvanised Mesh Filter to be cleaned at least 3 times a year;
- Longar, Type 21 - TYPE21F747MM600 (597 x 597 x 47) - F7 C-Cell Card Cased Filter to be checked 3 times a year and replaced if necessary; and
- 2 x Longar, Type 8 - CARBONCUBE242412 (597(w) x 597(D) x 292(H)) - GLC Custom, Galv LGR201 Activated Carbon Filters to be replaced if odour increases.

The Assessment concludes that implementation of the proposed odour control scheme would result in odour emissions from the proposed external discharge grille associated with the oven extract having a '**Low Impact Risk**'. My concern with this conclusion is that the proposed odour control scheme does not include an external stack to improve dispersion. The EMAQ guidance advises that a discharge stack shall:

1. Discharge the extracted air not less than 1 m above the roof ridge of any building within *15* m of the *vent serving* the commercial kitchen. *Additional smoke/grease/$PM_{2.5}$ extraction may be required depending on the cooking type, frequency and local authority policies regarding control of $PM_{2.5}$, for example to reduce $PM_{2.5}$ levels in areas where ambient levels are high and odour control measures may still be required depending on the cooking type and frequency.*
2. If *the discharge height requirements of* 1 cannot be complied with for planning reasons, then the extracted air shall be discharged not less than 1 m above the roof eaves or dormer window of the building housing the commercial kitchen. *A higher level of odour or $PM_{2.5}$ control measures than those required in part 1 may be required.*
3. If *the discharge height requirements of* 1 or 2 cannot be complied with for planning reasons, then *higher level of odour or $PM_{2.5}$ control measures than those required in part 1 or 2 may be required.*

The EMAQ guidance advises that the height and velocity of the final discharge are the two important factors and, generally, the greater the flue height, the better the dispersion and dilution of odours. The discharge of air should be at a minimum height of 1m above the roof ridge, especially if there are buildings nearby that may affect odour dispersion and dilution - where this is not possible (e.g. because of ownership or structural constraints), additional techniques will be required to reduce odours, such as an increase in efflux velocity, additional filters etc. The proposed odour control scheme states a discharge velocity from the extract grille of approximately 12.8m/s - the EMAQ guidance recommends about 15m/s, but never less than 7.5m/s. As the discharge height requirements would not be met, the effectiveness of the proposed system is dependent on particulate and odour control prior to discharge, rather than stack dispersion. If you are minded to approve the application, the odour control system should include a discharge stack, or an appropriate condition to allow the situation to be revisited in the event of odour complaints (see condition 3 below).

Recommendation

Following the submission of this additional information, I have no objection subject to the following conditions:

Condition 1 - Operating hours (in accordance with the hours stated in the application form)
The use hereby permitted shall not be open to customers, and no deliveries shall be taken at or despatched from the site, at any times other than between:
06:30-18:00 Mondays to Fridays;
07:00-18:00 Saturdays; and

08:00-17:00 Sundays and bank holidays.
The building services plant shall operate for no more than one hour before and one hour after the permitted times.

Condition 2 – Noise from external fixed plant
The building services plant to which this application relates shall be installed and operated at all times in accordance with the 'Noise Impact Assessment Report for Proposed Building Services Plant and Equipment' (1148-R01-V0, DG Acoustics, 04.09.2026) such that noise-sensitive premises in the vicinity are not materially affected.

Condition 3 – Odour from the kitchen extraction system
The commercial kitchen exhaust system shall be designed, installed, operated and maintained at all times to achieve a 'Low Impact Risk' when odour nuisance is assessed in accordance with the latest edition of the best practice document 'Control of odour and noise from commercial kitchen exhaust systems' (Ricardo EMAQ+). Records documenting the level of maintenance and servicing shall be kept and available for inspection for at least the preceding 2 years.
Following installation, if an assessment of odour or noise emissions from the kitchen extraction system by the local planning authority determines that further mitigation is required, appropriate measures shall be taken in accordance with a scheme to be approved in writing by the Local Planning Authority within an agreed period.

Condition 4 – Grease trap
A grease trap/filtration system (or a suitable alternative) shall be installed in the drainage system to remove fats, oils, grease and solid matter from the waste water before it leaves the premises. The equipment shall be installed, operated and maintained in accordance with the manufacturer's instructions and retained for so long as the use continues.

Regards,
Melanie Goodier | **Principal Pollution Officer**

Amber Valley Borough Council
Pollution Control | Town Hall, Market Place, Ripley, Derbyshire, DE5 3BT
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From: Godson, Rebecca <rebecca.godson@ambervalley.gov.uk>
Sent: 07 September 2026 11:33
To: Goodier, Melanie <Melanie.Goodier@ambervalley.gov.uk>
Subject: FW: **External Email**FW: [External] [OFFICIAL] AVA/2026/0388 - plant and new shopfront at Lloyds Bank, Belper

Hi Mel,
Here are the submissions for Greggs that we spoke about last week. Please let me know if you'd like an new formal reconsult putting on.

Kind regards,
Rebecca

From: Emma.Robson@greggs.co.uk <Emma.Robson@greggs.co.uk>
Sent: 07 September 2026 11:27
To: Godson, Rebecca <rebecca.godson@ambervalley.gov.uk>