

## Twineham Court Farm

### Technical Note: Response to Comments on Noise Report

28<sup>th</sup> May 2025

#### Introduction

A noise assessment report for the development of Twineham Court Farm as an events venue was produced by Phlorum, entitled 'Noise Assessment - Twineham Court Farm' issued in July 2024.

Further to the report, comments have been received from both the Environmental Health Officer (EHO) of Mid Sussex District Council (MSDC) and from Twineham Parish Council. This Technical Note addresses these comments.

#### Comments from the Environmental Health Officer of Mid Sussex District Council

The Consultee Comments, submitted on 10/12/2024, reference DN/24/2874 are shown below along with our response:

##### 1. Noise Survey Data

The report includes background and ambient noise level measurements for two days, with the third day excluded due to high wind speeds. While I understand the challenges posed by adverse weather conditions, two days of data may not provide a sufficiently robust baseline. Could Phlorum confirm whether they consider this data sufficient for an accurate and reliable assessment, or if additional measurements are recommended to enhance the reliability of the baseline data?

Response: We have been advised that most events will take place during the week and on Saturdays and the baseline noise survey provides reliable data for a Friday afternoon and evening, all day Saturday and a Monday morning with wind speeds below the recommended limit of 5 m/s. On this basis it is considered that no further baseline noise survey is required.

As discussed in the MSDC comments, it is acknowledged that the wind speeds invalidated the noise survey results on the Sunday, as also discussed in the Noise Report. As there will be few, if any events on a Sunday the exclusion of the baseline noise levels on the Sunday is not considered to be significant for the noise assessment.

As shown in Table 4.1 of the Noise Report (reproduced below), the measured daytime ambient noise levels are low (when considered against targets for gardens provided in BS8233:2014), ranging from  $L_{Aeq,T}$  42 to 48 dB and are considered to provide robust noise targets for the assessment of noise from the proposed events at Twineham Court Farm.

**Table 4.1 Summary of Daytime Measured Sound Levels, free-field dB**

Measurement Location	Date	Period	Duration, T	L <sub>Aeq,T</sub>	L <sub>AFmax</sub>	L <sub>A10,T</sub>	L <sub>A90,T</sub>
1	Friday 19 Jan 24	13:30-23:00	9 hours, 30 mins	42.7	59.3	41.6	31.3
	Saturday 20 Jan 24	07:00-23:00	16 hours	46.2	62.9	46.0	37.0
2	Friday 19 Jan 24	13:45-23:00	9 hours, 15 mins	44.1	61.4	40.4	31.9
	Saturday 20 Jan 24	07:00-23:00	16 hours	45.9	65.2	44.6	35.7
	Monday 22 Jan 24	07:00-12:45	5 hours, 45 mins	48.4	67.2	49.1	38.7

Note: <sup>(1)</sup> – The L<sub>A90,T</sub>, L<sub>Am</sub> and L<sub>A10,T</sub> and values are the arithmetic means of the L<sub>A90,T</sub>, L<sub>Am</sub> and L<sub>A10,T</sub> measurements for each period.

## 2. Assessment Methodology

The estimated noise levels are compared to the existing ambient noise levels. However, in a rural setting where background noise levels are typically much lower than ambient levels, would it not be more appropriate to assess the estimated noise against the background noise levels? I do note that Sections 5.13–5.15 look at background noise levels and acknowledge that noise beyond 11 PM could be problematic, particularly if music is played at 90 dB at 5m from the dance floor's centre.

Response: The predicted event music noise levels are ambient noise levels (L<sub>Aeq</sub>'s) and so have been compared to the baseline ambient noise levels so that a change in noise level due to the event music can be calculated, as shown in Table 5.1 of the report.

As suggested by the EHO, it is possible to compare the predicted event L<sub>Aeq</sub>'s against the baseline background noise levels (L<sub>A90</sub>'s) but MSDC has not indicated how this difference would then be assessed. The only guidance for event noise where the background noise levels are used is the 'Code of Practice on Environmental Noise Control at Concerts, The Noise Council, 1995' where for regular events Note 5 to Table 1 of the Code states that:

*'For indoor venues used for up to about 30 events per calendar year an Music Noise Level not exceeding the background noise by more than 5 dB(A) over a fifteen minute period is recommended for events finishing no later than 23.00 hours'.*

The predicted event noise levels have been considered against the measured baseline noise levels in the day and night-time periods to comply with the EHO's request and the results are shown in Table 1.

**Table 1 Predicted Noise with Venue Doors and Windows Closed**

Receptor	Predicted Music Noise Level	Baseline Background Noise	Difference (music V's existing $L_{A90}$ )
		$L_{Aeq,T}$ dB	$L_{A90,T}$ dB
<b>Daytime</b>			
R1	34	31	+3
R2	30	32	-2
R3	25	31	-6
R4	29	31	-2
<b>Night-time</b>			
R1	34	30	+4
R2	30	29	+1
R3	25	30	-5
R4	29	29	0

The largest difference between the baseline background noise and the predicted event noise levels is +3 dB in the daytime at receptor 1. When considering the Code of Practice for concerts a predicted level of 3 dB above the background noise level before 2300 hours is below the target of 5 dB above the background noise.

It is confirmed that internal music within the venue will finish by 2300 hours and so no further analysis of the night-time music effects have been provided.

### 3. Open Windows and Noise Impact

The report presents noise levels with windows closed but notes that noise would increase by 15 dB with windows open, which would be unacceptable. This raises concerns regarding the practical implementation of this mitigation measure, as there is a risk that guests or staff may inadvertently open windows, undermining noise control.

Response: It is recommended that there is a noise condition attached to the events licence that states that when music is being played within the venue that all doors and windows must remain closed and appropriate acoustically treated ventilation must be provided to maintain a reasonable internal temperature to prevent the need for opening windows. This will be combined with a Noise Management Plan that includes the internal noise limits for music and states that doors and windows must remain closed when music is being played at the venue.

#### 4. Mitigation Measures

I broadly accept the proposed mitigation measures outlined in Section 6.1, specifically:

- Ensuring all windows and doors are closed when music is playing.
- Controlling music noise levels up to 23:00 hours to ensure they do not exceed LAeq,15min 90 dB at 5m from the speakers or adjusting levels based on event-specific sound tests.
- Controlling low-frequency content in line with the Code of Practice on Environmental Noise at Concerts.
- Orientating speakers to face away from the nearest residential properties.
- Ensuring the building structure has no acoustically weak elements, with sound insulation matching or exceeding the performance of closed windows and doors.

However, I do not accept the recommendation that music played after 23:00 hours must merely be "not audible just outside the nearest residential property." This is vague, unenforceable, and insufficient for a newly constructed building designed to host events.

Response: As discussed above, the proposed noise mitigation measures are considered to be 'broadly' acceptable in the daytime.

In response to the EHO comments about music after 2300 hours, it is confirmed that internal music within the venue will finish by 2300 hours.

#### 5. Noise during the Day

Music noise during the day may be audible at times in nearby residents' gardens; however, it is unlikely to be significant, provided that all windows and doors at the venue remain closed during events.

I note that the design of the events barn includes a reception area that could be utilized as a buffer zone for ingress and egress. This would create a lobby between the main events area and any open doors, which is an effective measure to minimise noise escape. However, I recommend that the applicant address how the venue will manage cooling during warmer months, particularly as weddings and other events are more popular in summer. Without appropriate cooling systems, there is a risk that windows may be opened, compromising noise control measures. Incorporating solutions such as air conditioning or mechanical ventilation should be considered to ensure that the venue remains compliant with noise mitigation requirements while maintaining guest comfort.

Response: As discussed above, the reception area will be used as a sound lobby when events with music are taking place and one set of doors will always be closed. The procedure for door closure during music events will be included in the Noise Management Plan. A supporting statement will be provided by Wilbury Planning, which will refer to the attachment of a suitable condition relating to mechanical ventilation and air conditioning.

#### 6. Late Night Concerns

For a newly built structure, it is reasonable to expect it to be designed with sufficient sound insulation to allow for reasonable noise levels internally without disturbing nearby residents.

Expecting paying guests to tolerate sound levels below 90 dB for a wedding or similar event is unrealistic and unlikely to meet customer expectations.

**Response:** The music noise assessment has assumed a source noise level of  $L_{Aeq,T}$  90 dB at a distance of 5m (centre of a dance floor to the speakers) based on our experience of similar wedding events. A noise level of  $L_{Aeq,T}$  90 dB represents a noise level where conversations are not possible without shouting when at a distance of 1m apart. This noise limit is considered to provide a good compromise for a wedding venue where a reasonable music noise level for the dance floor is required but the music is not so loud that attendees are still able to converse in other parts of the venue, without having to shout. This noise limit will be managed by the venue to ensure that there are no exceedances and a protocol for managing the music noise levels within the venue will be agreed with MSDC.

## 7. EHO Recommendations

1. Enhanced Mitigation: Additional improvements to the building's sound insulation should be proposed to better manage noise impacts from late-night music.
2. Alternative Management Strategies: The applicant could consider alternative approaches to managing late-night music. From experience, granting permission for a late-night music venue without robust noise control measures can lead to conflicts between the need to safeguard residential amenity and the expectations of event attendees. It is crucial to address this balance in the design and operation of the venue.

**Response:** A supporting statement will be provided by Wilbury Planning, which will refer to the attachment of suitable conditions relating to the issues raised by the EHO, including opening hours. It is confirmed that internal music will finish by 2300 hours.

## 8. Traffic and Plant Noise

I agree with the assessment that traffic noise is unlikely to present a significant issue and that noise from plant equipment can be adequately controlled with appropriate conditions.

**Response:** No further comment.

## 9. Conclusions

While I broadly accept the proposed mitigation measures for events ending by 23:00 hours, I do not support the current recommendations for noise management beyond this time. The applicant should provide further details or propose additional measures to ensure the venue can operate late-night events without causing unacceptable noise impacts on nearby residents.

Recommendation: Seek further clarification and amendments before granting approval.

**Response:** It is confirmed that internal music within the venue will finish by 2300 hours.

## Parish Council Comments

The objection letter from Twineham Parish Council (undated) includes the following paragraph regarding noise:

There are major concerns regarding noise. The suggestion that windows should be closed whilst music is played (Planning Statement 6.25) would seem difficult to implement, particularly in the summer months. Noise in the countryside travels considerably and will result in a significant nuisance to many households in the area, not only to those living closer to the site. If planning permission is granted, a noise limitation device should be a required condition included in the approval.

The Noise Management Plan for the venue will include a management protocol to ensure that doors and windows are closed when live music is taking place. Furthermore, mechanical ventilation/air conditioning will be provided to ensure that the internal temperature is comfortable to reduce the need for patrons to attempt to open the windows/doors.

It is agreed that the music noise will be controlled and limited such that a noise limit, which will be agreed with Mid Sussex District Council will not be exceeded.