

Charlotte Handscomb
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14 May 2026

Dear Charlotte,

Imberhorne Lane, East Grinstead

Acoustic Appraisal and Peer Review

1.0 Introduction

Further to our discussions and the meeting with the Environmental Health Officer (EHO) and planning officer at Mid-Sussex District Council ('the Local Authority'), this letter outlines the information agreed during the meeting on 7th May 2026.

My scope in respect to this study has been to:

- Review the ethos of planning condition 24 (ref: DM/23/2699) having spoken with the Local Authority;
- Review and appraise the noise assessment designed to discharge the above planning condition; and
- Determine the appropriate way forward given the relevant policy available at the time of writing.

I am Adam Walker, Principal Consultant at Peninsular Acoustics, which is a member of the Association of Noise Consultants (ANC). I am a specialist consultant in acoustics, with over ten years' experience in acoustics and seven years directly in consultancy. This appraisal has been reviewed by James Francis Healey, Director of Peninsular Acoustics, chairman of the specialist Building Acoustics Group of the Institute of Acoustics (IoA), and a consultant with over 22 years' experience.

James is the co-author of the Acoustics, Ventilation and Overheating: Residential Design Guide (AVOG) which is heavily referenced in all consultation for this project and is the principal author of the Approved Document O Noise Guide (ADONG).

Both James and I are full corporate members of the IoA (MIOA).

2.0 Relevant Context

I have undertaken an independent review of the following:

- Decision notice DM/23/2699 dated 23rd December 2025 (Mid Sussex District Council), specifically planning condition 24;
- Ardent Consulting Engineers Noise Impact Assessment (NIA) reference 2206781_A-ACE-XX-XX-RP-C-0601, December 2025 (hereafter referred to as 'the NIA').

In presenting this appraisal, I have relied upon the guidance within:

- BS 8233:2014 '*Guidance on sound insulation and noise reduction for buildings*';
- The ANC / IoA/ Chartered Institution of Environmental Health (CIEH) document ProPG: Planning & Noise '*Professional Practice on Planning and Noise: New Residential Development (May 2017)*';
- The World Health Organisation's '*Guidelines for Community Noise*' (WHO 1999);
- The WHO's Night Noise Guidelines for Europe, 2007 (NNGLE 2007);
- Approved Document F (2021) Volume 1: Dwellings of the Buildings Regulations (AD-F);
- Approved Document O (2021) Overheating (AD-O); and
- The ANC Approved Document O Noise Guide (ADONG).

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3.0 Overview

The Site is located to the west of East Grinstead, and the nearest source of road traffic noise is circa 630m to the north (London Road, A22). The Site is on the boundary of the London Gatwick N65 flight path contour, and the NIA reported flights were audible during the site visits.

The NIA reported existing sound levels of 46 – 48 dB $L_{Aeq,16hr}$ during the daytime (positions MP2-4) and 39 – 42 dB $L_{Aeq,8hr}$ during the night-time. When considering the initial risk grading tool in ProPG, these levels would be classed as a “negligible risk and the application need not normally be delayed on noise grounds.”

To facilitate the Site, a spine road is proposed from the south-east of the development travelling north and west through the centre of the Site. This spine road is the only access to and from the Site and so it is reasonable to consider all road traffic will utilise this road regularly.

It is understood that the road will have a speed limit of 20mph and there is a total of 550 dwellings to be constructed on the Site.

4.0 NIA Appraisal

The NIA highlights that existing noise levels at the Site are low and opts to assess the spine road using traffic flow data with daytime $L_{Aeq,16hr}$ predictions provided in free-field conditions.

The NIA states that a 15 dB reduction is appropriate for a partially open window and internal noise levels will be satisfied. However, the latest guidance in ADONG reflects the fact that the sound insulation via an open window varies depending on how open that window is. ADONG recommends that the acoustic consultant provides an upper limit in terms of equivalent area which can then be used by the overheating assessor to accurately model the overheating risk in the dwelling.

5.0 Planning Condition 24

It is understood that the concerns raised by the EHO are relating to part a) of condition 24:

Planning condition 24 has several elements for which the key paragraphs are replicated below.

To support any residential reserved matters application(s), a scheme that addresses the issues of acoustics, ventilation and overheating shall be submitted to the Local Planning Authority to demonstrate how the proposals meet the following requirements;

Good acoustic design shall be fully integrated into the scheme. The hierarchy of good acoustic design outlined below shall be applied in descending order and the methods utilised shall be clearly outlined in an Acoustic Design Statement.

The scheme shall:

a) outline the level of noise exposure for each property and how the noise level within any domestic living room or bedroom, with windows open for normal ventilation, shall comply with the desirable internal noise levels as outlined in Table 2.1¹ of BS8233:2014 and;

Where the standards in (a) or (b) above cannot be achieved following GAD and with windows open, only then shall the scheme show how those standards will be met with windows closed and how adequate ventilation and cooling will be provided.

¹ Assumed to be Table 4 of BS 8233



6.0 Year-Round Ventilation & Noise

BS 8233 internal noise levels are widely adopted to represent the Lowest Observed Adverse Effect Level as far as applying the policy in the National Planning Policy Framework (NPPF) and Noise Policy Statement for England (NPSE).

It is important to separate out noise during the provision of appropriate year-round ventilation as stipulated in AD-F and the provision of reasonable internal noise conditions during shorter-term summertime overheating. This is clearly explained within AVOG.

When providing year-round ventilation, the targets of BS 8233 should be achieved through one of the three systems outlined in AD-F:

- 1 Intermittent mechanical extract fans and supply air via trickle vents;
- 2 Continuous mechanical extract fans and supply air via trickle vents; or
- 3 Mechanical Ventilation with Heat Recovery.

The dwellings will comprise continuous mechanical extract ventilation in wet rooms and kitchens thus trickle ventilators achieving minimum 4,000mm² Equivalent Area will be installed in each habitable room to provide year-round adequate ventilation. In this circumstance, the design as it stands should satisfy the BS 8233 internal noise levels during provision of year-round background ventilation when windows are closed. It is, therefore, concluded that in respect of satisfying the ventilation requirement in the planning condition, this would be satisfied by a default Building Regulations design.

7.0 Overheating & Noise

When an occupant is seeking to manage or mitigate overheating, they have to consider several factors: what temperature they are comfortable with, what level of daylight they can accept, what noise level they find acceptable, etc. All these factors are usually considered, and a reasonable balance is chosen. The current TM59 overheating modelling criteria aim to effectively avoid the onset of discomfort, so they can be considered the threshold between LOAEL and SOAEL. This same approach was taken when defining the noise standards in AVOG. The Level 2 AVOG internal noise level table specifically recognises this fact, and presents a scale of internal noise levels, with an understanding that an occupant can accept higher internal noise levels if they are exposed to this noise level less frequently.

Another way of considering this approach is to understand that if the dwellings are designed with measures to reduce overheating (e.g. window size, orientation, materials, etc.), then the occupant would need to mitigate overheating (e.g. by opening a window) less frequently.

Noise levels across the site are not significant, and mitigation of overheating passively via an open window should be possible for most dwellings. This is exactly the approach that the developer will have to undertake as part of normal Building Regulations sign-off.

During the meeting with the EHO on 7th May, the EHO stated that the ethos and intent of the condition was that:

- Residents should be able to open their windows on the whole;
- Where windows must be closed, justifications should be made as to why they are closed;
- If they are closed, an overheating assessment should be provided to demonstrate both thermal and noise internal conditions will not result in an adverse impact on residents.

It was agreed by all parties that this was a fair and reasonable request. However, there is a mismatch between the very low noise standards being sought and the desire to implement the cooling hierarchy whilst avoiding active cooling. The current noise standards, BS 8233, are designed to be met with windows closed and 'adequate ventilation' provided in AD-F. Requiring this during periods of overheating could require several dwellings to keep their windows closed continuously which may inevitably lead to active cooling, which is contrary to the intent of the condition.



To achieve the ethos of the planning condition, being *'to ensure that the layout of the site and the design of the proposed buildings provide a high quality environment for future residents and to accord with policy DP26 of the Mid Sussex District Plan 2014-2031'*, whilst also maintaining a reasonable balance between noise conditions, air flow through the dwelling, energy costs and the use of a sustainable, low-carbon building design, a daytime internal level of 45 dB $L_{Aeq,16hr}$ is proposed as advocated in AVOG, for plots most exposed to daytime road traffic noise.

A reasonable allowance for a partially open window is circa. 10 dB, which typically equates to an Equivalent Area [e.g. window open area] limit (as per the guidance in ADONG) of circa. 0.48m². This will restrict the windows exposed to higher noise levels, whilst still allowing some window opening on these facades. These rooms can then reduce overheating risk by opening windows on sheltered facades that are not exposed to road traffic on the Spine Road.

Therefore, it is proposed that any plots that are predicted to be exposed to noise from the Spine Road exceeding 55 dB $L_{Aeq,16hr}$ will require further window restrictions and will be subject to detailed analysis (at a later stage) to demonstrate that they provide suitable mitigation to overheating whilst also achieving 45 dB $L_{Aeq,16hr}$ internally. Where plots are predicted to be exposed to noise less than 55 dB $L_{Aeq,16hr}$ it is assumed that noise levels are deemed to not be significant and, therefore, do not need any further analysis.

Plots predicted to be exposed to noise levels exceeding 55 dB $L_{Aeq,16hr}$ are marked on the attached plan and evidence will be provided to show that they achieve 45 dB $L_{Aeq,16hr}$ internally, whilst satisfying the requirements of TM59 and Approved Document O.

8.0 Next Steps

Based upon the meeting with the EHO, the ethos of the condition is that residents should be able to open their windows freely and not have adverse impacts from noise. As outlined in this document, the provision of year-round ventilation is considered in AD-F and this has been satisfied in full.

During summer periods, it is widely acknowledged that residents have to balance multiple conditions including light levels, temperatures and noise levels to combat overheating. This is the purpose of AVOG which specifies increased noise levels, based upon modern research, to ensure that dwelling design does not automatically include mechanical ventilation or cooling systems which are costly and have a negative impact on the environment; both in installation and running/maintenance costs.

The proposed criteria for internal measures, accompanied with equivalent area calculations in accordance with ADONG, have shown that circa 48 plots (<10% of the Site) should have an overheating assessment conducted during the detailed design stage, which can be subject to a planning condition attached to the Reserved Matters decision notice. All other dwellings will be considered as part of the Building Regulation process.

When conducting the overheating assessment, any mitigation measures shall be established following the cooling hierarchy as defined below:

1. *Minimise internal heat generation through energy efficient design*
2. *Review the properties to enable passive ventilation (e.g. cross ventilation)*
3. *Provide mechanical ventilation*
4. *Provide active cooling (ensuring they are the lowest carbon options possible)*

The above measures would be localised on a plot specific basis and would not impact the overall layout or fundamentally change the scheme design which would fundamentally change the Reserved Matters application.

Sincerely,

Adam Walker BSc (Hons) MIOA
Principal Consultant



Legend	Outside to Inside Sound Insulation	Total Daytime Equivalent Area
	10dB	0.50
	11dB	0.40
	12dB	0.30

13/05/2026	P01	Planning Application	AW
DATE	REV	DESCRIPTION	BY

PROJECT: Imberhorne Lane
TITLE: Daytime Equivalent Area
REF: PA2091-ACO-00-P01



Notes
EA = Equivalent Area. Measurements and derivation of outside to inside level difference have been based on the recommendations within the Institute of Acoustics / Association of Noise Consultants document *Approved Document O Noise Guide* and research by [Peninsular Acoustics](#). EA based on smallest room fronting the spine road. Bedrooms with 20m² or more may benefit from additional specific calculations. Actual EA for UKO modelling will be based on actual window openings and room sizes. The exposure is based upon daytime L_{Aeq,16hr} only, further plots may require assessment as part of the Building Regulations process.