

Hurstwood Sports Group Limited
(Via Email)

19/09/2025

Dear Stu and Chris

Padel Tennis Application to Mid Sussex District Council (DM/25/1185)

Further to the EHO (Jane Cooper) response to the planning case officer dated 11th September 2025, the following comments from Acoustic South East are made in blue text.

I have assessed the report, and I acknowledge the absence of specific national guidance for padel tennis noise assessments. The use of Sport England guidance for artificial grass pitches, and levels mentioned in BS8233 is a reasonable approach, but I have the following comments and queries:

1. The assessment appears to focus solely on residential façades. I'm wondering why the communal gardens serving Southdowns Park, especially the bandstand area, which is closer to the proposed courts and regularly used by residents, haven't been considered as receptor locations. These spaces are important for community amenity and, being outside and closer to the proposed courts, will be more impacted. Is there a reason these outside spaces have not been included in the assessment?

The bandstand areas were not included as they are not residential components. In my numerous visits to the site, as well as colleagues and the clients' visits, the bandstands were never seen being used and their inclusion as an amenity space is questionable. Notwithstanding this, the model was run with receptor positions added for each of the 3 bandstand locations which were West, Middle and East of the site, marked as bandstand 1, bandstand2 and bandstand 3 respectively. The model was run, again with all sound sources operational, ie Padel and persons speaking within the dwell area with the following results obtained.

Bandstand 1 (West) – 33.6dB $L_{Aeq,T}$

Bandstand 2 (Middle) – 48.3dB $L_{Aeq,T}$

Bandstand 3-(East) – 35.6dB $L_{Aeq,T}$.

These are all comfortably below the requirements for the onset of annoyance as described in the World Health Organisation Guidelines for community noise dated 1999, revised 2018. The predicted sound pressure levels are also below the requirements for external amenity areas, as described in ProPG2017.

2. I'm not convinced that LAeq alone captures the true impact of padel noise although I appreciate the inclusion of worst-case LMax predictions in the report and agree that these do not represent continuous levels. From my recent visit to padel courts in Cuckfield, the soundscape is characterised by frequent, sharp, and impulsive impacts, particularly from ball strikes against bats. Compared to other sports played on artificial grass (typically football/rugby/hockey) where ball impacts are less acoustically prominent and/or more sporadic, padel produces a pattern of regularly recurring high-impact noise events. This character of sound may be perceived as being more intrusive than the report would suggest by using predicted LAeq and a single LMax value over an hour. Would the acoustic consultants consider whether a BS4142-style assessment, incorporating character corrections for impulsivity and intermittency, might offer a more representative view of the potential impact?

The assessment ran worst case models with all sound sources operational for both LAeq and LMax. The worst-case Southdowns Park receptor position at the third floor, is still a significant distance from the proposed padel courts (80m) and whilst the methodology of 4142 is noted, character corrections are only applied where they are heard at the receptor location. It is therefore questionable whether it is relevant to add for impulsivity and/or intermittency for a receptor at 80m in distance. It is also noted that in section 1.3 of the BS4142:2014-A1:2019 standard, that it should not be used for recreational activities or people noise.

Also, it is relevant to note that the character corrections within BS4142:2014-A1:2019 are applied to the specific sound, the LAeq in order to achieve a Rating Level. In this instance, the assessment has taken account of impulsivity/intermittency by also applying a worst case LMax value into a separate model. It is therefore reasoned that the LMax does take account of intermittency and impulsivity.

Whilst it is relevant to note that the specific sound is greatest at a third floor receptor at Southdowns Park, it is also apparent that a resident on the third floor will receive a greater contribution of noise levels from further afield. The upper floors of Southdown Park are visible from a distance to the South of Fox Hill and whilst not reflected in the ground floor measurements for the survey, the upper floor residents are likely to receive increased noise levels from road traffic.

3. The report indicates that noise from padel will be audible at noise sensitive receptors but counters this by stating that noise from the currently permitted tennis courts would also be audible. They do however concede the following differences in the noise produced through playing padel and tennis:

“It is clear that Padel features longer, more frequent extended rallies involving exchanges of volleys. Serving is always underarm in Padel, requiring less preparation and the contained court reduces time spent retrieving balls. Tennis features more forceful hitting and more powerful serves, but less frequent impact sounds. Singles tennis features less frequent rallies of volleys than doubles. Padel is always played as a doubles sport by default. Padel allows rebounds from the glass walls, and occasionally the ball is struck directly against the wall to rebound into play.”

Given the above, I’m not entirely convinced that the argument regarding the existing use of the land carries weight, as the acoustic character of padel differs notably from tennis. While there may be some noise associated with tennis, it’s not directly comparable to the impact sounds generated during padel play. It’s also worth noting that the current tennis courts are not floodlit, which naturally limits their hours of use. This makes direct comparisons with the proposed padel courts less straightforward.

Lighting is not an acoustic concern, but the principle of sports facilities which are audible on the site remains a valid point. Whilst not used at present, the tennis courts could easily be brought back into use without the requirement for planning and their play would be audible to those nearby. It is recognised that tennis and padel differ, hence the reference to the Clarke Saunders. Contextually, tennis courts exist and these are being repurposed to allow sports at the site.

Additionally, in section 7.6 of the acoustic report, the overheating standard has been referenced rather than the levels outlined in BS8233. Both standards relate to nighttime noise thresholds that should not be exceeded more than 10 times per night. However, there is no equivalent guidance for daytime L_{Amax} levels, and my concern is how repeated impact sounds, potentially thousands throughout the day, might affect residential amenity, both indoors and in the garden spaces.

It is recognised that there is no specific daytime guidance for L_{Amax} parameters and also specific to Padel. However, the inference to be drawn from section 7.6 is that if the overheating guidance is capable of being achieved to facilitate sleep, then there is no reason why a resident should not be able to sleep in the daytime period with the window open.

Impact sounds from bats hitting balls, from balls striking perimeter screens and vocal noise from players and spectators are likely to affect how local residents use their gardens and may result in them having to close their windows. Where there is likely to be an observed adverse effect, it falls to the developer to mitigate noise and to reduce it to a minimum, and I would invite the acoustic consultant’s comments on this matter.

Section 7.5 of the report assessed for an open window scenario which achieved a lowered internal sound pressure level criterion for inside a residential premises. These show that reduced BS8233:2014 levels are achieved with an open window. Therefore, the levels will be lower still with a closed window.

4. It has been brought to my attention that flats at Southdowns Park are only permitted to have single glazing, has this been considered by the acoustic consultant. My concern is that even if residents choose to keep their windows closed during the summer, the level of sound insulation provided by single glazing may be insufficient to prevent noise intrusion.

As stated above, the report assessed that there was not a problem with regards to residents having open windows. Therefore, for residents with closed windows would have further attenuation from outside to inside sound pressure levels.

To respond to the point around windows, and specifically single glazed windows, below is a side by side comparison of Pilkington single and double glazed windows. For reference, a standard thermal double glazed window is typically 4/12/ (a 4mm pane of glass, a 12mm void and an additional 4mm pane of glass). Assuming a worst case of a 4mm single pane window, both columns have been annotated to show the difference. In reality, there is little difference, and the single glazed panel actually performs better with the low frequency correction applied (ie R_{traffic} , which is $R_w + C_{tr}$).

Table 1 – Single Glazing						Table 2 – Pilkington Insulight™						
Third octave band Centre Frequency (Hz)	Sound Insulation (dB) for Glass Thickness (mm)					Third octave band Centre Frequency (Hz)	Sound Insulation (dB) for Glass Thickness (mm)					
	4	6	10	19	4 x PVH		4/12/4	6/12/6	6/12/6.4 +4	10/12/4	10/12/6	10/12/6.4 +4
100	17	18	24	28	18	100	25	27	19	23	27	27
125	23	20	26	29	22	125	24	26	24	28	27	28
160	22	22	28	31	22	160	23	22	21	26	24	26
200	21	22	26	31	22	200	21	18	19	19	24	26
250	21	23	28	32	26	250	21	20	18	23	22	29
315	24	26	29	35	26	315	19	24	24	26	31	37
400	26	29	32	36	29	400	25	27	28	31	33	34
500	29	31	34	38	31	500	25	29	32	33	34	36
630	30	33	36	36	33	630	30	33	34	36	37	40
800	32	34	37	38	34	800	31	37	38	39	39	41
1000	34	36	38	38	36	1000	36	38	40	41	40	42
1250	34	36	38	40	36	1250	38	39	40	41	41	41
1600	36	38	40	44	36	1600	40	39	39	41	39	41
2000	36	39	40	47	34	2000	41	38	38	43	37	42
2500	31	38	41	50	31	2500	35	37	38	45	40	44
3150	25	34	43	52	35	3150	31	42	44	42	43	49
4000	31	38	44	55	39	4000	40	45	46	44	47	51
R_w (dB)	27	29	33	37	30	R_w (dB)	29	30	31	34	34	36
$R_{w,1}$ (dB)	30	32	36	40	33	$R_{w,1}$ (dB)	31	33	34	36	38	40
$R_{w,2}$ (dBA)	27	28	32	36	29	$R_{w,2}$ (dBA)	24	26	27	29	32	34

Taking account of the worst case predicted L_{Aeq} , and L_{Amax} values at the third floor of Southdowns Park, the predicted external freefield levels (rounded) were 42dB $L_{Aeq,T}$ and 58dB L_{Amax} .

With a 30dB reduction for a single glazed window this would account for 12dB internally with regards to $L_{Aeq,T}$ and 28dB with regards to L_{Amax} values. It is therefore argued with a closed window that there will not be any impact from the Padel.

5. The report mentions monitoring carried out between 07.00 and 22.00 however in the submitted NMP it states that if noise complaints are received the club will consider adjusting hours of use to 07.00 indicating that an earlier start time is being sought. Please can the applicants confirm the hours of operation applied for.

The applicant confirms that the proposed courts would not be used prior to 07:00 or later than 22:00 hours. Reference is drawn to section 3 of the client's NMP where noise controls are discussed and this is to ensure that the quieter hours at the beginning and end of the day are not used for high intensity play. This is a sensible approach.

6. I have not received the information relating to lighting that I requested in my email dated 25 June 2025. The conservation officer may also wish to comment regarding the proposed flood lighting.

No comment

I am looking to protect both local residential amenity and the applicant's long-term interests. If the development proceeds as currently proposed, I feel it is likely to generate noise complaints, and the Council would then be duty-bound to investigate under the Environmental Protection Act 1990. If a statutory nuisance were found to exist, this could lead to the service of an Abatement Notice, potentially requiring further mitigation works, or significant restrictions on hours of use. Such outcomes could be more costly and less flexible than addressing the issues now at the planning stage and it is therefore in the applicant's interest to try to resolve these matters proactively. I would therefore like to propose a meeting with the acoustic consultant, possibly at the padel courts in Cuckfield, to discuss the issues with this application to try to find a mutually acceptable solution

The acoustic consultant is more than happy to meet with the EHO at a padel location of their choosing. It would be wise for the client to also be present with their knowledge of Padel at other locations within Sussex.

Any questions or queries, please do not hesitate to call.

Yours sincerely

