

EBISS UK Ltd
21 Victoria Gardens
Burgess Hill
West Sussex
RH15 9NB

Date: 03/07/2026
Job No.: J4186
Site: 21 Victoria Gardens, Burgess Hill
Issue: 2 (addresses additional concerns around night-time
Lmax values)

Dear Lorna,

Thank you for passing on the comments from the Senior Planning Officer at Mid Sussex District Council relating to your application for hours extension (DM/26/1498).

It is understood that their concerns are three-fold:

1. That the report only deals with entrance to and exit from the gated area on your premises during these extended hours 04:00 – 07:00hrs and 19:00 – 22:00hrs and does not include for loading and unloading. They seek clarification that this is indeed the case.
2. That the application is not enforceable or reasonable under NPPF as monitoring the situation is “difficult to monitor” and the Local Authority seeks comment on this.
3. Further to issue 1 of this response, a third concern has come to light, which refers to the EPO wanting Lmax values investigated in accordance with BS8233 as they are concerned that Lmax values directly emanating from door-slams are not considered.

Firstly, addressing point 1, it has been explained in the original report that all loading and unloading of vehicles will be strictly carried out during the hours of 07:00 – 19:00, no earlier and no later. This has been checked many times by me (the report author) with EBISS UK Ltd staff including you and this is confirmed in writing. For this reason, there was no need to include any assessment of loading and unloading in the report as it is beyond the scope. It is also understood that the planning consultant Tim Rodway of Rodway Planning has also confirmed this to the Local Authority separately.

Secondly, addressing point 2, it is understood that there is full CCTV on site, which covers the gated area of the EBISS UK Ltd premises. This allows activity during all hours to be monitored on site and will confirm whether staff are indeed adhering to the proposed planning agreement. If they are found to not be, then this can lead to appropriate measures being taken to rectify and be compliant. It is presumed that this could be requested by the Local Authority, thus allowing the situation to be appropriately monitored.

Thirdly, addressing point 3, Lmax events would have been addressed in the original BS4142 Rating Level Assessment in the form of Impulsivity, as door-slams were included as part of the original survey measurements. These must, however, be considered from the position of the nearest noise

sensitive receptor (NSR). This is clearly addressed in Section 4.3 of the original report (as dated 07/05/2026). Therefore, it would be unfair and inappropriate to include for the impulsivity factor a second time by looking specifically at the Lmax values: the very point of the BS4142:2014+A1:2019 Rating Level process is to include for these types of characteristics and apply the necessary penalties accordingly.

This being said, in order to appease the Local Authority, assessment has been carried out anyway: See below.

BS8233:2014 no longer directly deals with Lmax levels but indeed points towards other documents such as WHO Guidelines for Community Noise 1999 (as updated) to deal with this. (Please note ProPG:2017 also deals with Lmax).

WHO Guidelines state that no more than 10-15 events of Lmax exceeding 45dBA WITHIN a bedroom should occur during the night time.

ProPG:2017 is the same, but limits the number of occurrences to no more than 10.

Clearly, it is not possible to measure the sound insulation of the façade of the nearest NSR, but the value of 13dB for sound reduction through a partially open window can be used (this is the value widely accepted, as it is based upon the ProPG:2017 document).

In reviewing the time-history of different activities measured, door slams have been identified and these are shown in the table below:

Vehicle	Measurement Distance	SPL (dBA)
Small Van	3m	54.6
3.5T	10m	51.6
7.5T	12.5m	55.2
7.5T	12.5m	57.8

Table 1: SPL of Door Slams as measured on site during survey visits

Using the following formula, it is possible to calculate the additional attenuation to apply for distance from the door slam location of the parked vehicle to the nearest NSR:

$$20 * \log(r^2/r_1)$$

Where:

r1 = original measurement distance

r2 = new measurement distance

The distances from the vehicles (when in their proposed parking locations) to the nearest NSR are as follows:

Small Van: 36m to nearest NSR when parked, therefore additional distance attenuation = 21.6dB

3.5T Van: 31m to nearest NSR when parked, therefore additional distance attenuation = 9.8dB

7.5T Truck: 20m to nearest NSR when parked, , therefore additional distance attenuation = 4.1dB

Using the information above, the table has been re-used, but shows the resultant SPL at the NSR from door slams and also shows the resultant SPL inside the NSR via a window which is partially open for background ventilation:

Vehicle	SPL at NSR (dBA)	SRI through open window (dB)	SPL inside NSR (dBA)
Small Van	33	13	20.0
3.5T	41.7	13	28.8
7.5T	51.1	13	38.1
7.5T	53.7	13	40.7

Table 2: SPL of Door Slams calculated for the nearest NSR

In all of these cases, the SPL is below the Lmax criterion which causes potential sleep disturbance and as such it is confirmed that Lmax values from door slams of the vans would completely satisfy the criterion set out by the aforementioned standards and will as follows, satisfy BS8233 and furthermore, the Local Authority.

I trust that the above is clear and acceptable.

For Acoustic South East,



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