

Stefan Galyas

From: [REDACTED]
Sent: 17 February 2026 16:56
To: Stefan Galyas; [REDACTED]
Cc: [REDACTED]
Subject: Re: Hurstwood Sports Group - Ref: DM/25/1185
Attachments: Outlook-pwhzodlx; Colwell Ground Pre- App advice MSDC.pdf; Example Colwell Ground design.pdf; 61060.mp4

Dear Stefan,

Apologies for the late response.

In reference to your email of the 12th of January 2026 and the various queries that have been raised I put forward the following responses:

[REDACTED]

A). We undertook various lines of research prior to engaging with Acoustic South East on a comprehensive acoustic report, this involved looking at current Government advice concerning appropriate legislation around sound particularly in relation to Padel courts, BS4142 was considered as it came up in a search based around a previous Padel court application. The quote below is direct from the Government website scope description of BS4142:

1.1 The environment agencies require operators to assess industrial sound (and sound of an industrial nature) following BS 4142 – where appropriate and relevant.

BS 4142 is a method to assess the impact on humans in residential premises.

It is appropriate for assessing sound levels outside a building that are from:

- industrial premises, manufacturing premises or fixed installations
- mobile plant, vehicles, train or ship movements within the permit boundary

It is not appropriate for:

- any non-human receptors, including bats, birds or other protected species
- non-residential premises such as offices, schools, churches or outdoor areas such as recreational parks, gardens or sports ground

Because of the last point stating it is not appropriate for non-residential premises such as sports grounds we dismissed BS4142 as an adequate measure for the proposal we were applying for.

This led us to seek more relevant guidance for the change of use application. After reviewing available resources, we identified Sport England's *Artificial Grass Pitch Acoustics, 2015* as the appropriate benchmark for addressing noise impact on the local environment.

B). After engagement with Acoustic South East we were glad to see that they considered the Sport England guidance as well as other standards around acoustic concerns including:

- BS8233 (Sound insulation and noise reduction for buildings) 2014
- National Planning Policy Framework (NPPF), 2024
- BSEN ISO9921:2003- Ergonomics - Assessment of Speech Communication
- Acoustics Ventilation and Overheating Guidance, 2020
- Building Regulations Approved Document O

Scott Castle the managing director of Acoustic South East produced a comprehensive report that allayed our concerns on the acoustic effects that would be involved in the change of use from tennis courts to Padel courts, this was added to the planning application on the 21st of August 2025.

There has been ongoing dialogue between Scott Castle from Acoustic South East and Jane Cooper (EHO) after concerns were first raised around noise levels from Padel and Scott's report on how Acoustic South East's conclusions were reached, the dialogue on the 19th September 2025 where Jane first raised direct concerns are listed below with Scott's responses:

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 stie, 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 LAeq,T

Bandstand 2 (Middle) – 48.3dB LAeq,T

Bandstand 3-(East) – 35.6dB LAeq,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 LAmax value into a separate model. It is therefore reasoned that the LAmax 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 Rtraffic, which is Rw+Ctr).

Table 1 - Single Glazing

Frequency Centre Frequency (Hz)	4	5	6	10	15	25
100	17	18	24	25	25	28
125	21	22	28	29	29	32
160	22	23	29	30	30	33
200	23	24	30	31	31	34
250	23	24	30	31	31	34
315	24	25	31	32	32	35
400	25	26	32	33	33	36
500	26	27	33	34	34	37
630	26	27	33	34	34	37
800	27	28	34	35	35	38
1000	27	28	34	35	35	38
1250	27	28	34	35	35	38
1600	27	28	34	35	35	38
2000	27	28	34	35	35	38
2500	27	28	34	35	35	38
3150	27	28	34	35	35	38
4000	27	28	34	35	35	38
R _w (dB)	27	28	34	35	35	38
R _w (dB)	27	28	34	35	35	38
R _w (dB)	27	28	34	35	35	38

Table 2 - Pilkington Insulight

Frequency Centre Frequency (Hz)	4/12/4	4/12/4	4/12/4/12/4	4/12/4	4/12/4	4/12/4/12/4
100	21	21	29	21	21	27
125	24	24	31	24	24	30
160	25	25	32	25	25	31
200	26	26	33	26	26	32
250	26	26	33	26	26	32
315	27	27	34	27	27	33
400	27	27	34	27	27	33
500	28	28	35	28	28	34
630	28	28	35	28	28	34
800	28	28	35	28	28	34
1000	28	28	35	28	28	34
1250	28	28	35	28	28	34
1600	28	28	35	28	28	34
2000	28	28	35	28	28	34
2500	28	28	35	28	28	34
3150	28	28	35	28	28	34
4000	28	28	35	28	28	34
R _w (dB)	28	28	35	28	28	34
R _w (dB)	28	28	35	28	28	34
R _w (dB)	28	28	35	28	28	34

Taking account of the worst case predicted LAeq, and LAMax values at the third floor of Southdowns Park,

the predicted external freefield levels (rounded) were 42dB LAeq,T and 58dB LAMax.

With a 30dB reduction for a single glazed window this would account for 12dB internally with regards to LAeq,T and 28dB with regards to LAMax 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.

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.

(Please note the meeting did not take place at Cuckfield but Scott did go and take further readings on the 9th of October at Cuckfield and added this to his report).

All the above points are considered and relevant (apart from no.5 which we are happy to discuss as part of possible mitigation measures) and Scott's responses backed up by his data, coupled with using all the relevant guide lines around how to use data when assessing noise in a sporting environment. This points us to conclude that in terms of the acoustic assessment everything has been considered properly and BS4142 would not enhance the material facts of how this change of use from Tennis courts to Padel courts is going to affect the local environment.

C). Recent case in Reigate, Surrey where the use of BS4142 was questioned as a standard for rating and assessment of Padel courts replacing tennis courts:

ADDENDUM
MEETING OF THE PLANNING COMMITTEE
WEDNESDAY 26th JUNE 2024

ITEM NO: 5

PLANNING APPLICATION: 22/02353/F- REIGATE LAWN TENNIS CLUB, MANOR ROAD, REIGATE

Following the publication of the Committee report, further correspondence was received from a neighbouring property and their appointed noise consultants, maintaining their view that train noise should be disregarded in line with BS4142 and that the proposed mitigations are insufficient to avoid significant noise impacts to neighbouring gardens. They consider an acoustic fence of 4 metres height with a superficial mass of at least 10 kg/m² along 2 and a half sides of the padel courts, be required, as shown in the plan below:



In response to this, the Council's consultants, Regulatory Support Services, have provided the following further advice:

Use of BS4142

I would question the applicability of BS4142 to the application. This standard is for the rating and assessing industrial and commercial sound. Section 1.3 states that the standard is not intended to be applied to the rating and assessment of sound from recreational activities, including all forms of motorsport.

Noise from other sporting facilities such as artificial grass pitches is assessed in terms of averaged noise values with reference to the WHO Criteria for noise in outdoor amenity spaces and internal noise levels. The noise modelling undertaken by both the applicant and the objectors consultants reported similar results with predicted values not exceeding 50dBLAeq at the boundary with the garden of the nearest residents, approximately 40m away. In the WHO Guidelines for Community Noise 50dBLAeq is identified as the onset of community annoyance. Note that this modelling ignores any contribution from the two existing tennis courts located between the boundary and the site of the padel courts.

This case above highlights where Reigate's councils' consultants considered BS4142 but questioned the validity of using it as the correct measure for the application.

Conclusion:

Having submitted a valid acoustic report, refined through expert consultation and based on UK best practice for sports, it would be counterintuitive to now require a BS4142 assessment—a standard not designed for this specific activity. On this basis, we respectfully will not be pursuing a BS4142 report at this point and believe our justifications listed above in points A/B/C are valid.



List of concerns and responses:

- i) Fencing – concern over solid fencing introduced alongside replacing existing tennis court fencing.

There is no solid fencing to be introduced, I think the confusion is that the padel courts have tempered glass surrounding each end and partially down the sides, this is part of the playing arena and is not a fence, being glass it is also see through so there shouldn't be any visual issues.

- ii) Hard Landscaping replacing existing grass areas.

There is a small grass bank approximately 2m wide by 2m long that we would like to replace with steps and a ramp to cater for disabled players, however if this is

deemed not acceptable there is no problem for the bank to stay as it is, all clients can still enter by using the steps and pavement that leads from the swimming pool end of the facility.

iii) Proposed new structures.

Entrance area – this would be a small shipping container to provide a reception area for staff to greet and look after clients, we are using a shipping container as it is easily removed after 36 months, and is easy to clad with wooden slats, we would look to replicate the current bowling clubhouse in terms of design and materials so that the structure fits into the existing landscape.

Seating area in between the courts - this will be removeable outside seating as you would use in your garden at home, the only hardscaping would be the poles that hold a canvas sail over this area to provide some respite from sun and rain and an area where clients can leave their kitbags so they don't get wet.

iv) Hard-Surfacing – the intention is to replace the existing broken tarmac structure of the tennis courts with a new permeable tarmac, everything else then sits onto this surface including the Padel courts / entrance shipping container / seating furniture, the Padel courts themselves will have a playing surface of 2 g plastic that is referred to as the carpet, this is part of the structure, it fits into the court as would a carpet in a bedroom, this will be green in colour to reflect the environment of the Southdowns and the surrounding gardens.

v) Acoustic Fencing – at this point there hasn't been any move towards acoustic fencing and if there was a need for it we would apply as part of the planning process.

Overall, the design element has been to fit in and enhance the sporting environment that is currently in a very poor state of repair, Padel tennis is experiencing a growth period globally and there is a chance to have a positive impact on local sport by introducing a considered facility within the local community.



1. Hurstwood Sports Group's Wider Redevelopment Vision for The Colwell Ground Haywards Heath

The wider redevelopment referenced in the original Planning Statement relates to land owned by the freeholder immediately below the current application site, known as Colwell Ground, we have been working on this plan for the last 3 years.

Colwell Ground currently comprises:

- A dilapidated clubhouse building
- A dangerous entrance and roadway for the public access

- Three natural grass football pitches
- Facilities used extensively by Lindfield Juniors FC and St Francis Youth FC
- Buildings and surrounding areas that have fallen into disrepair

Due to the condition of the facilities, the site has increasingly become a location for antisocial behaviour and vandalism. The current infrastructure no longer reflects the needs or expectations of modern community sport provision.

We have already carried out designs with our architect for the Colwell Ground future vision and submitted a pre-app which Joseph Swift has positively responded (see attached). As you can see our long-term vision is to work collaboratively with the Local Authority and the freeholder to deliver a comprehensive community sports hub, including:

- 3G all-weather football pitches
- 2G hockey pitch
- Padel courts
- A modern clubhouse facility incorporating:
 - Café
 - Gym
 - Changing rooms
 - Multi-use recreational space

The intention is to create a sustainable, year-round community asset that supports grassroots sport, youth development, and broader community wellbeing. This would significantly enhance the usability and security of the site while addressing existing deterioration.

The freeholder has access to approximately £1.5m in Section 106 funding which will contribute toward the delivery of what is envisaged as the Hurstwood Sports Grounds redevelopment.

2. Role of the Temporary Padel Courts

The proposed 3 padel courts located adjacent to the swimming pool above Colwell Ground form part of a phased and strategic approach.

The temporary padel installation would:

- Act as a proof of concept for expanded racquet and community sport provision
- Demonstrate commercial viability and community uptake
- Support confidence in delivering the wider sports hub
- Generate early activation and positive use of the site

This phased model reduces risk while enabling momentum toward the comprehensive redevelopment vision.

3. Temporary Nature & Removability of Structures

The proposed padel structures are:

- Modular and demountable
- Non-permanent in foundation design
- Capable of full removal without long-term ground disturbance

If a temporary permission of 36 months were granted, the structures could be removed at the end of that period with:

- Dismantling of the steel and glass court systems
- Removal of surface treatments
- Restoration of the land to its former condition
- Courts moved to the lower grounds

We would be willing to agree to a condition requiring the site to be returned to its previous use upon expiry of the temporary consent, should the wider redevelopment not proceed within that timeframe.

4. Reasonableness of Temporary Condition

Given...

- The demonstrable need for enhanced sports provision
- The poor condition of the wider site
- The modular and reversible nature of the proposal
- The clear strategic link to a larger redevelopment vision
- The significant health and wellbeing benefits associated with increased access to sport and physical activity

The proposal supports wider public health objectives by:

- Increasing opportunities for regular physical activity for adults and young people
- Providing accessible racquet sport provision suitable for a wide age range and mixed abilities
- Encouraging social interaction, reducing isolation and improving mental wellbeing
- Supporting structured youth development through sport
- Promoting active lifestyles within the local community

Padel in particular is recognised as an inclusive and highly social sport, encouraging sustained participation due to its accessibility and lower physical barrier to entry compared with traditional tennis.

In this context, a temporary consent would not only enable testing of the wider regeneration Colwell Ground concept but would also deliver immediate and tangible public health benefits during the consent period.

We therefore believe a temporary permission with a restoration condition would be reasonable, proportionate, and consistent with local and national planning policy objectives supporting community sport, health improvement, and sustainable regeneration.

[REDACTED]:

Opening hours Mon - Sat 7.30am – 10.15pm

Playing hours Mon - Sat 8am – 10pm

Opening hours Sun & Bank Holidays 8.30am – 9.15pm

Playing hours Sun & Bank Holidays 9am – 9pm

We have revised these opening and playing times from original documentation after consultation with other clubs and feel this gives a better balance for the business and the local environment.

Parking – Dedicated spaces (12) in the carpark adjacent to the bowls club, there will be no parking in the current swimming pool spaces in front of the courts and members will be made aware of a zero tolerance policy in regard to this and parking in spaces dedicated for Southdowns park residents, we understand how disruptive this can be.

I hope this email demonstrates how we are prepared to work with the local council and its residents to bring a fantastic opportunity to the centre of Haywards Heath, we understand the concerns raised and are willing to work towards a solution that resurrects a tired tennis club into a modern sporting facility via a commercial business that has community at its heart, that is the reason we named our business after the ancient woodland that surrounds the facility.

Regards



Hurstwood Sports Group Ltd
