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**Indoor Padel at Unit N Whitehall Site, Chelworth Industrial Estate,
Chelworth Road, Cricklade, SN6 6HE**

This letter is provided in response to the word document received from Wiltshire Council EHO.

- File name - 'PL202601432 Public Protections comment 05062026.docx'

The EHO document fundamentally suggests that a BS4142 assessment has not been created and should be applied to padel.

Note - The Institute of Acoustics is the UK's professional body for those working in acoustics, noise and vibration. Lots of research is undertaken by various IOA members for various reasons. It is recognised that padel is a new sport rapidly spreading across the UK, and does not have any statutory rules/regulations, however, within our industry there is unanimous agreement that BS4142 is not appropriate for Padel.

Top of the list of reasons is because it literally says within BS4142 that it is not suitable. BS4142 is designed to evaluate industrial and commercial sound (such as fixed mechanical plants and factory machinery) rather than human recreational activity.

BS4142 Section 1.3 states this standard is not intended to be applied to the rating and assessment of sound from:

- a) recreational activities, including all forms of motorsport;**
- b) music and other entertainment;
- c) shooting grounds;
- d) construction and demolition;
- e) domestic animals;
- f) people;**
- g) public address systems for speech; and
- h) other sources falling within the scopes of other standards or guidance.**

Padel is a recreational activity, it includes noise from people, and there are appropriate other standards and guidance aimed at assessing sporting events etc.



Sport England, WHO, and IEMA are the most common standards used in the UK for assessing padel and other activities that are considered to be (a), (f) and (h).

Lots of padel courts around the UK have been granted permission based on the Sport England, WHO and IEMA guidance. Just like the Sharps Redmore report we reference in our Appendix, which has been used multiple times across the UK.

Sport England & WHO

The Sport England Design Guidance document - Artificial Grass Pitch (AGP) Acoustics - Planning Implications 2015, is often used by Councils when considering applications for multiuse games areas where various sports can be played, including football, hockey, rugby, tennis, netball, basketball, etc.

The Sport England guidance first discusses the World Health Organisation (WHO) Guidelines for Community Noise.

The WHO guidelines specifically state:

- *“Typical neighbourhood noise comes from premises and installations related to the catering trade (restaurant, cafeterias, discotheques, etc.); from live or recorded music; **sport events** including motor sports; **playgrounds**; car parks; and domestic animals such as **barking dogs**.”*

Padel is obviously a sporting event, it comprises people noise just like a playground would, and it has impulsive noises just like a barking dog.

Sport England and WHO recommends 50dBA Leq,T should not be exceeded. This is the same lower value recommended in BS8233 as discussed in our report. In hindsight we could have expanded on this WHO commentary, but IEMA is more stringent, and is the worst case method we have used in our report.

Our report shows the predicted padel noise would be around 25dBA at the nearest noise sensitive residential receptor. Consider this would be -25dBA below the value of 50dBA, which the WHO would suggest for ‘sport events’, ‘playgrounds’ and ‘barking dogs’.

IEMA

Sport England suggests that the impact of new noise should also be compared to existing ambient background noise in accordance with IEMA guidance, to determine if the 50dBA as recommended by WHO is not stringent enough.

IEMA compares new noise to lowest ambient background noise, and as such it is usually a far more stringent test of noise impact acceptability than WHO.

The EHO has raised some concern about - *‘Fails to adequately consider sensitive time periods, particularly early morning’*.



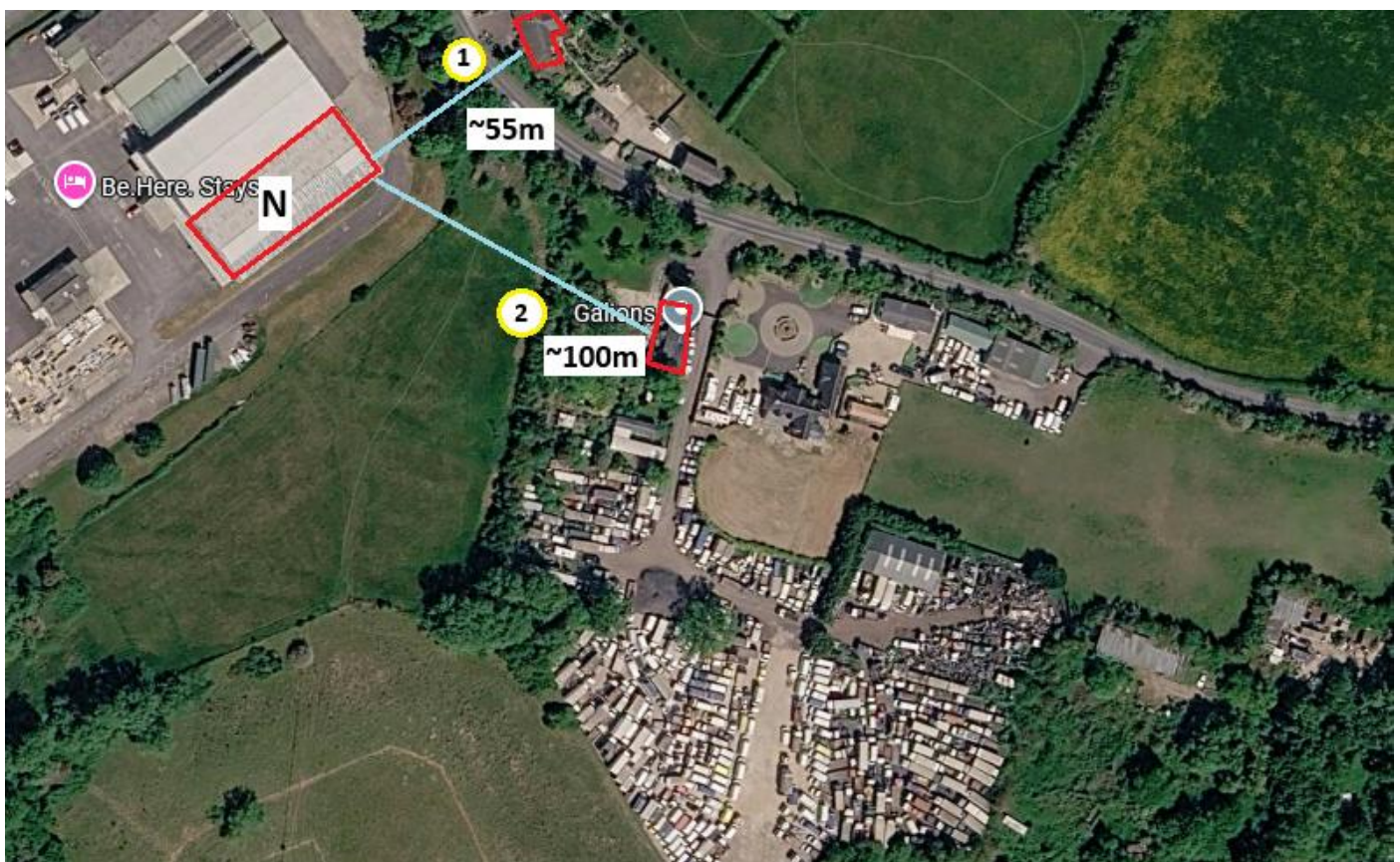
The client is willing to discuss opening times, however, it should be noted that the quietest period of time is circa 22:30h - 23:00h at night.

This period of time is significantly quieter than from 5am onwards, when the noise associated with the industrial estate is already getting much louder. From 5am onwards the lowest levels measured were around 10dB louder than at night-time.

This late evening period is worst-case, it is the period of lowest noise that padel is proposed to be open, and this is what our assessment is based on.

The lowest ambient background noise level we measured between 05:00h and 23:00h, was 51dBA Leq,_{1h}, at Position 1, which is representative of the nearest noise sensitive house circa 55m away.

The lowest ambient background noise level we measured, and based our assessment on, was 38dBA Leq,_{1h}, at Position 2 between 05:00h and 23:00h. This property is considerably further away, and appears to be located in a large commercial vehicle storage yard, and we suspect noise levels at this property would actually be considerably higher if we measured on the other side of the fence.



Our report shows the predicted padel noise would be around 25dBA at the nearest noise sensitive residential receptor around 55m away. This is -13dB below the lowest 38dBA Leq,_{1h} we measured at Position 2 much further away.

We have applied the lowest possible target criteria, to the nearest house which is circa 55m away, based on more stringent background measurements that were made towards the house 100m away.



IEMA says that having established the likely change in sound levels, an indication of the significance of the change can be determined from Table 7-12 of the IEMA Guidelines as copied below.

TABLE 7-12 EFFECT DESCRIPTORS

Very Substantial	Greater than 10 dB LAeq change in sound level perceived at a receptor of great sensitivity to noise
Substantial	Greater than 5 dB LAeq change in sound level at a noise-sensitive receptor; or a 5 to 9.9 dB LAeq change in sound level at a receptor of great sensitivity to noise
Moderate	A 3 to 4.9 dB LAeq change in sound level at a sensitive or highly sensitive noise receptor; or a greater than 5 dB LAeq change in sound level at a receptor of some sensitivity
Slight	A 3 to 4.9 dB LAeq change in sound level at a receptor of some sensitivity
None/Not Significant	Less than 2.9 dB LAeq change in sound level and/or all receptors are of negligible sensitivity to noise or marginal to the zone of influence of the proposals

This table indicates that an increase of 0dB to 2.9dB would be of 'None/Not Significant' effect.

IEMA assessment methodology clearly suggests, that if the new noise is predicted to be equal to or less than the lowest background, i.e. 0dB increase or any dB decrease, then this should be deemed acceptable.

We do not believe our assessment method could be any more stringent and robust.

However...

There does appear to be a point made in the EHO response that we have not quite accounted for. They suggest we have not considered 4 courts operating simultaneously. They are correct, the data used is described as:

"During the survey, 2 courts were in use with four players in each court. Measurements were taken at the rear and side of the court. There was no significant difference in noise levels measured at the side and rear of the court."

So, if we double the number of courts in operation, then we must add +3dB to all our predicted noise levels, which would equate to 28dBA.

This would now be -10dB below the lowest value we measured.

If we quadruple the number of courts in operation, then we could add +6dB to all our predicted noise levels, which would equate to 31dBA.

This would now be -7dB below the lowest value we measured.



This is still significantly lower than the lowest ambient background measurement and should be deemed acceptable.

The principles of the NPPF and Noise Policy Statement for England would also agree with the IEMA methodology. If you look at the IEMA effect and magnitude wording it is very similar to NPSE.

We would therefore suggest our assessment indicates the predicted padel noise would be less than what NPSE would classify as:

- 'NOEL' – No Observed Effect Level
This is the level below which no effect can be detected and below which there is no detectable effect on health and quality of life due to noise.

Which should be deemed acceptable.

BS4142

When setting plant noise emission criteria, reference is commonly made to BS4142:2014 "*Methods for rating and assessing industrial and commercial sound*". If any building services items are installed in the future, they may need to be assessed in accordance with BS4142.

Whilst it is clear that BS4142 is not the appropriate test method for padel noise, let us take a moment to try and attempt to apply the principle to padel noise.

Please see graph included in Appendix A. This graph includes the dBA L90 data from nearest noise sensitive receptor location.

When assessing plant noise, BS4142 suggests:

The significance of sound of an industrial and/or commercial nature depends upon both the margin by which the rating level of the specific sound source exceeds the background sound level and the context in which the sound occurs.

An estimation of the impact of the specific noise can be obtained by the difference of the rating noise level and the background noise level and considering the following:

- Typically, the greater this difference, the greater the magnitude of the impact.
- A difference of around +10dB or more is likely to be an indication of a significant adverse impact, depending on the context.
- A difference of around +5dB is likely to be an indication of an adverse impact, depending on the context.
- The lower the rating level is relative to the measured background sound level, the less likely it is that the specific sound source will have an adverse impact or a significant adverse impact.
- Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low [or no] impact, depending on the context.



In using the background sound level in the method for rating and assessing industrial and commercial sound, it is important to ensure that values are reliable and suitably represent both the particular circumstances and periods of interest. For this purpose, the objective is not simply to ascertain a lowest measured background sound level, but rather to quantify what is typical during particular time periods.

Depending on the context the determination of the 'rating level' and the 'background level' are both open to interpretation. With reference to the above, it appears reasonable to infer that if the rating level does not exceed the background noise level, then the noise is likely to be deemed acceptable.

The outcome of the assessment is then determined by consideration of both the excess of Rating Level over the Background Sound Level, and consideration of all pertinent contextual factors.

We reiterate - BS4142 says:

"...the objective is not simply to ascertain a lowest measured background sound level, but rather to quantify what is typical during particular time periods..."

Ignoring this statement for a moment, consider the lowest L90 measured was 35dBA L90.

As mentioned - If we quadruple the number of courts in operation, then the predicted noise levels would equate to 31dBA at the nearest noise sensitive house.

This is 4dB lower than the lowest L90 and would be deemed acceptable.

We could add a BS4142 penalty of +3dB for impulsivity, for sounds which are just perceptible at the noise sensitive receptor, we would then get a rating level of 34dBA.

This is 1dB lower than the lowest L90. This would also be deemed acceptable.

Lawful Use Class

Planning consent was granted in 2023 for E, B2 and B8 use. There are obviously many activities associated within B2 use, that has the potential to be significantly noisier than padel.

A simple Google search (<https://www.planninggeek.co.uk/use-class/directory/>) finds the following examples of B2 activities, which could operate in Unit N without any noise assessment required.



Bakery Processing Plant	Food Manufacturing	Movie Studio
Boat building	Food Processing Plant	Nano-brewery
Car Body Shop	General Industrial	Parcel Company
Car Repairs	Heavy Equipment Workshops	Printing Press / Factory
Catering Premises & Production	Industrial Process	Recycling Centre
Chemical Factory	Knacker's Yard	Research Laboratory
Courier Service	Manufacturing Plants	Slaughter House
Dairy Processing Plant	Meat Processing Plant	Textile Factory
Engineering Workshop	Mechanical Workshop	Tyre fitting
Factories	Micro-brewery	Waste Processing Plant
Film Studio	Motorcycle Repairs	Yacht Building

Specific EHO Points

The EHO document makes the following points to which we present a reply.

“By contrast, the methodology used in the submitted report:

- *Relies on LAeq measurements, which include transient sounds (e.g. traffic), and therefore do not accurately represent background conditions against which new noise should be assessed;*

The is the correct parameter associated with IEMA, Sport England and WHO guidance.

- *Does not account for the character of padel noise, which is inherently impulsive (ball strikes) and intermittent (play patterns), characteristics that can increase perceived impact and are explicitly addressed in BS4142;*

It is unanimous agreement in our industry that BS4142 is not to be used to assess sporting events.

- *Does not present a transparent or reproducible noise prediction methodology, making it difficult to verify the conclusions reached;*

Noise measurements from a padel game are highly repeatable. The measurements we made on site are highly repeatable. And our calculations are mathematical, and therefore repeatable.

- *Relies on third-party, non-site-specific source data, with no clear demonstration that it represents a robust or worst-case scenario for the proposed 4-court development;*

It is impossible to get site specific noise data until the padel courts are constructed.

We have referenced data that has been successfully approved on many planning applications.

- *Does not assess cumulative impacts from multiple courts operating simultaneously or associated activity;*

This point is correct and has been discussed above. We reiterate as follows:



The data used in our assessment was described as: - *“During the survey, 2 courts were in use with four players in each court. Measurements were taken at the rear and side of the court. There was no significant difference in noise levels measured at the side and rear of the court.”*

If we doubled the noise data by adding +3dB, or quadrupled the noise by adding +6dB, we still show there would be no adverse impact.

- *Fails to adequately consider sensitive time periods, particularly early morning.”*

We have discussed this above. 22:30h to 23:00h is circa 10dB quieter than from 5m onwards, and as such has used the most stringent and robust assessment data.

Conclusion

Any new noise predicted or measured, which is less than or equal to the lowest ambient background measurement at the nearest noise sensitive receptor, assessed in accordance with IEMA guidance, should be deemed acceptable for padel.

We would suggest that IEMA guidance satisfies the objectives of NPPF and Noise Policy Statement for England, which is the fundamental test of acceptability for planning.

It is unanimously agreed in our industry that BS4142 is not applicable to padel, but we have shown that it would also comply.

Whether assessing to Sport England, WHO, BS8233, BS4142 etc, we have clearly shown that Padel should pose no negative noise impact from Unit N, and as such planning permission should be granted.

We trust the above is in line with your requirements, however, if you require anything further please do not hesitate to contact us.

Yours sincerely,

Adam Kershaw
Director, BSc(Hons), MIOA
Pulsar Acoustics



APPENDIX A

