

Louis Wong
Welbeck Strategic Land IV LLP

25th November 2025

Dear Louis

Land North of Guildford Road, Rudgwick. 90 Unit Scheme - DC/25/1269

I write further to the Environmental Protection comments from Kevin Beer dated 21/11/2025.
Acoustic South East comments are in blue.

1. From reviewing the above report we note that with windows open internal noise levels in the properties in the south-western corner of the site i.e. those nearest the A281, will be above the internal noise criteria detailed in BS 8233 for both daytime and nighttime hours. LAmax levels during the nighttime hours are also a likely to be a cause for concern.

The ProPG assessment for the worst-case plot (29) is assessed as low to medium risk.

With enhanced glazing and acoustic wall/trickle vents the BS8233 criteria will be achieved.

It is reiterated that this is an outline application and internal room orientations are not yet decided, as explained in section 6.2 of the reporting.

2. In order to achieve acceptable internal noise levels and prevent overheating windows on the properties closest to the A281 would need to be kept closed and potentially costly mitigation and ventilation systems would need to be installed and maintained of the lifetime of the development.

Based on past projects it is likely that overheating could be mitigated without the need to open bedroom windows at night. As well as window sizing and low G glass additional mechanical ventilation may be required. Sometimes this could be provided by a full ducted ventilation system. In many other projects a simpler continuous extract system, with passive vents and a boost setting has been sufficient for the TM59 assessment to pass.

3. In our view the above mitigation should however be seen as the last solution once all available site layout solutions to address noise have been explored. This view is detailed in Figure 2/Note 5 of ProPG which states *Designing the site layout and the dwellings so that the internal target levels can be achieved with open windows in as many properties as possible demonstrates good acoustic design.*

As per points 1 and 2 above, the scheme is outline consent and shown as working. Whilst the comments are noted about moving properties/units, there are real time site constraints such as overhead pylons and trees to consider that drive the site layout.

It is also recognised that the ProPG assessment for the worst-case plot (29) is a low to medium risk.

Regarding openable windows, the LT1 position was at approximately 4.5m from the roadside. Creating an openable window on distance attenuation alone from a road traffic sound source requires approximately 115m set back from the road side. The site is approximately 81m deep.

It is also recognised that whilst openable windows might not be suitable for the façade directly overlooking the A281, for the windows at the rear of the property, these are likely to be openable.

4. Given our above comments we are not convinced that the layout represents good acoustic design, as detailed in with ProPG – Planning and Noise. In our view there seems to be adequate space within the footprint of the development to move the dwellings in the south western part of the development to another part of the site so that they are not located in the noisiest part of the development. This would obviate the need for mitigation measures and the costs of maintaining these measures for the lifetime of the development.

See point 3 above.

5. We also note the comment in section 6.4 *The noise mapping predictions indicate that all garden spaces will be below 50dB LAeq, 16 hour which comfortably achieves the requirements of BS8233:2014 and ProPG2017.* From reviewing Figure 12 in the above-mentioned report I would appear however that a number of gardens in the south western part of the site are above the 50dB criteria in BS8233 which is also a concern.

Current UK guidance indicates that gardens should not exceed 55dB LAeq,16 hour. (the upper limit detailed in BS8233, WHO and ProPG)

Additional Comments

6. Whilst the report assesses the impact from road traffic noise, which is welcomed, from reviewing the proposals we note that a 'sub station' is proposed in the north western part of the site. The potential noise impacts from this on proposed residential amenity should also form part of the proposals.

As an outline application, reserved matters can be used to deal with mitigation measures that would likely assess concepts such as a substation at 13m from the nearest residential property. An assessment can be made in due course using NANR45 to consider the impact. This could be addressed with suitably worded conditions.

7. It is also not clear if air or ground source heat pumps are proposed. If they are then detail on the locations of these should be provided in support of the application.

As per previously indicated points, the application is outline and matters such as the locations of Air Source Heat Pumps/Ground Source heat Pumps can also be addressed with suitably worded conditions.

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

Yours sincerely



Scott Castle
Director
Acoustic South East