



Reference: Billingshurst Trade Park

Project No: 2523126

Date: 9 March 2026

Technical note

Re: Noise Assessment

1.0 Introduction

- 1.1 Sharps Redmore (SR) have been instructed by the Dunmoor Group ('Dunmoor' the current landowner and developer), to carry out an environmental noise survey and assessment for at land south of Billingshurst Business Park (Phase 3), Hilland Farm, Billingshurst.
- 1.2 Outline planning permission is being sought for 4,885 sqm of Eg(iii)/B2/B8 floorspace, with associated yard areas, vehicle parking and access, with all matters apart from access.
- 1.3 The site has extensive planning history and SR has carried out numerous reports for the site which has included an assessment of noise impact from the proposed units. The most recent of these assessments was a report dated 6 October 2025, which was prepared to accompany a hybrid application for mixed-use development, which included an assessment of business floorspace, for which permission is now being sought. The layout on which the assessment was based has been revised and the purpose of this note is to update the previous work carried out to reflect the indicative layout proposed.

2.0 Assessment Methodology and Criteria

- 2.1 The National Planning Policy Framework (NPPF) (December 2024), sets out the Government's planning policies for England and "these policies articulate the Government's vision of sustainable development." Paragraph 198 of the NPPF states the following:

"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- a) *mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*
- b) *identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*

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- c) *limit the impact of light pollution from artificial light on local amenity, intrinsically dark*

2.2 Guidance on the interpretation of the policy aims contained within the NPPF is contained within the National Planning Practice Guidance (NPPG).

2.3 Both the NPPF and NPPG reinforce the March 2010 DEFRA publication, “Noise Policy Statement for England” (NPSE), which states three policy aims, as follows:

“Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:

- *avoid significant adverse impacts on health and quality of life;*
- *mitigate and minimise adverse impacts on health and quality of life; and*
- *where possible, contribute to the improvement of health and quality of life.”*

2.4 Together, the first two aims require that no significant adverse impact should occur and that, where a noise level which falls between a level which represents the lowest observable adverse effect and a level which represents a significant observed adverse effect, then according to the explanatory notes in the statement:

“... all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of life whilst also taking into consideration the guiding principles of sustainable development. This does not mean that such effects cannot occur.”

2.5 It is clear that the fact a noise can heard is not reason to refuse planning permission. Regard must be had to the significance of any impact and the mitigation measures available determining planning applications.

Local Policy

2.6 In terms of local policy regard is had to Horsham District Planning Framework – November 2015, Policy 24 ‘Environmental Protection’ and Policy 33 ‘Development Principles’ which state the following:

Policy 24 – Environmental Protection

“The high quality of the district’s environment will be protected through the planning process and the provision of local guidance documents. Taking into account any relevant Planning Guidance Documents, developments will be expected to minimise exposure to and the emission of pollutants including noise, odour, air and light pollution.”

Policy 33 – Development Principles

“In order to conserve and enhance the natural and built environment developments shall be required to:

Ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land, for example through noise, whilst having regard to the sensitivities of surrounding development.”

- 2.8 Further guidance on the assessment of noise is provided within the Sussex Planning Noise Advice Document (November 2023). The guidance within this document is discussed in more detail below.

Design Guidance

- 2.9 It is possible to apply objective standards to the assessment of noise and the effect produced by the introduction of a certain noise source may be determined by several methods, as follows:

- i) The effect may be determined by reference to guideline noise values. British Standard (BS) 8233:2014 and World Health Organisation “Guidelines for Community Noise” contain such guidelines.
- ii) Alternatively, the impact may be determined by considering the change in noise level that would result from the proposal, in an appropriate noise index for the characteristic of the noise in question. There are various criteria linking change in noise level to effect. This is the method that is suited to, for example, the assessment of noise from road traffic because it is capable of displaying impact to all properties adjacent to a road link irrespective of their distance from the road.
- iii) Another method is to compare the resultant noise level against the background noise level (L_{A90}) of the area. This is the method employed by BS 4142:2014+A1:2019 to determine the impact of noise of an industrial or industrial type nature and therefore is relevant in this case.

Local Design Guidance

- 2.10 As referred to above the Sussex Noise Advice Document (November 2023) provides further guidance on the assessment of noise. This document compliments the advice contained within the NPPF and NPSE and also contains guidance on objective noise criteria for various types of development. In relation to Industrial and commercial sites and plant, the following noise thresholds are recommended:

1. The rating level of the plant should, where practicable, be no greater than the existing background levels, when measured in accordance with BS 4142.
2. Where background noise levels are very low, discussions should be had with the LPA on the objectives to be agreed;
3. Apply the indoor ambient noise levels in Tables 4 and 6 of BS 8233:2014.

- 2.11 The principle of commercial development (Phase 2) has previously been consented by Horsham District Council. The original application was accompanied by a noise assessment which considered the impact of noise from the outline scheme. Although the Environmental Health Officer has concerns regarding the layout of the scheme, particularly on the eastern boundary, outline planning permission was granted subject planning conditions. The conditions are summarised below:

Condition 14 – Pre-Occupation Condition – Submission of a Noise Management Plan

Condition 19 – Pre-Occupation Condition – Noise from plant, machinery, and equipment

Condition 20 – Pre Occupation Condition – Post completion noise assessment of noise break out from industrial units.

Conditions 31 – 33 – Regulatory Condition – Restricting hours of operation

Condition 58 – Regulatory Condition – Restriction on hours of operation of petrol filling station and drive-thru unit.

- 2.12 It is considered that similar conditions would apply in this case.

3.0 Noise Survey Details

- 3.1 Sharps Redmore has undertaken several surveys at the site in relation to the previous applications, including a survey in 2018 prior to any development taking place on the site and a survey in 2021 to take into account the new residential properties to the south of the site. A further survey was carried out in May 2025 to determine noise levels at a location considered representative of the proposed residential properties. The survey locations are shown in Figure 1 below:

FIGURE 1: Monitoring Locations

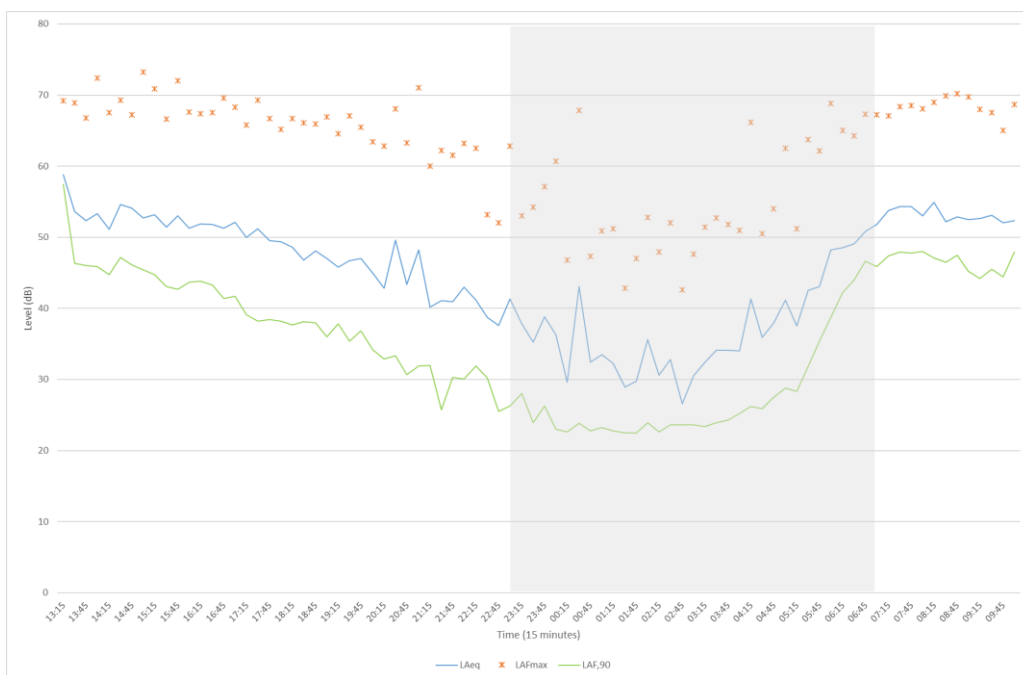


- 3.1 In relation to the application, location 3 is representative of the residential properties to the south of the site, these being the closest noise sensitive properties to the Proposed development. The results of the measurements at this location are summarised below:

TABLE 1: Survey results – Jan 2021 – Location 3

Day (0700 – 2300 hrs)		Night (2300 – 0700 hrs)		
L _{Aeq} 15min	L _{A90} 15min	L _{Aeq} 15min	L _{A90} 15min	L _{Afmax}
38 - 55	26 - 57	27 - 51	23 - 47	43 - 69
52 - 55	44 - 48	--	--	--

Figure 2: Survey Results Jan 2021 – Location 3



- 3.2 The survey is 4 years old; however, SR have visited the site on several occasions since this date including the updated survey in May 2025. Whilst there has been development in the area since 2021, the character of the noise climate has remained similar, and it is considered that noise levels measured in 2021 will provide a robust baseline against which to assess any potential noise impact.

4.0 Noise Assessment

- 4.1 The nearest noise sensitive properties to the proposed units are the residential properties to the south of the site. The following assessment considers the impact of noise on these properties.
- 4.2 SR has previously carried out a noise assessment for Phase 3 of the development which included an assessment of the commercial units in a similar location to those proposed. The assessment considered the impact of noise from external activity, car parking and servicing, noise break-out from units and noise from mechanical services plant. It was concluded that subject to conditions, similar to those imposed on the existing outline consent, that the site can be developed as proposed in line with the policy aims of NPPF and planning practice guidance.

Noise from mechanical services plant

- 4.3 As with previous phases of the development, the choice and selection of plant will not be made until a later stage in the design process and therefore the precise details of the mechanical services plant and refrigeration equipment (type and noise signature) are not known at this stage. However, the fixed plant may consist of refrigeration and condenser units, air handling units, extract fans, boilers and emergency generators. It is therefore likely that, similar to the existing outline application, details of the any plant will be required to be submitted and approved by the local planning authority prior to installation to ensure that noise levels do not exceed specified criteria i.e. 5 dB below background.
- 4.4 As discussed in section 3.0 of this report existing background noise levels are dictated by road traffic noise on the A29. Based on noise levels measured at location 3 typical background noise levels were 46 dB during the day, which reduced during the evening period and night time period. Typical background noise levels during the night time period to 23 dB.
- 4.5 SR has previously advised that such an approach is unreasonable and onerous, however the local authority has still required that noise levels should be 5dB below background and it is assumed that the same standard will apply in this case.

Noise from car park activity

- 4.6 Surveys of noise levels at the boundaries of similar car parks have shown that levels range from $L_{Aeq,1hr} = 43$ dB to 48 dB at a distance of 10 metres. The baseline noise value of $L_{Aeq,1hr} = 48$ dB is considered a robust (worse case) baseline maxima to apply to parking activities. Maximum noise levels from car door slams were typically 68 dB L_{Amax} at 10 metres
- 4.7 Based on the proposed layout the nearest properties to parking areas will be at least 70 metres from the nearest noise sensitive properties. At these distances noise from car parking activity will be significantly below the daytime and night time guideline values and

it is concluded that noise from parking activity will not cause significant adverse impact to local residents.

Noise break-out from buildings

- 4.8 Similar to other phases of the development the buildings will be constructed of composite metal panels which will typically have a sound reduction performance in excess of 30 dB Rw. Taking into account the likely use of the buildings and the distance to the nearest receptors it is not considered likely the noise break out from the building will cause significant impact to local residents.
- 4.9 The impact of noise break-out from the buildings will depend on the final user of the units, and if likely to cause high levels of internal noise or operate during the noise sensitive periods then it may be necessary to include additional noise mitigation measures to control noise. These may include increased sound insulation to the units or operational measures such as keeping doors closed during noise-sensitive periods. These measures can be implemented as part of a noise management plan which can be submitted once the end-user is known. This is similar to the approach taken in relation to existing outline consent.

Noise from external activity

- 4.10 Whilst layout of site is different the proposed loading bays will be no closer than those previously assessed by SR in the report dated 6 October 2025, which was submitted with the application DC/26/0033. Therefore, predicted daytime noise levels at the closest noise sensitive properties will be similar, around 46 dB L_{Aeq1hr} , to those previously predicted by SR. Maximum noise levels at night ($L_{A_{fmax}}$) would also be similar and as advised in the previous SR Report will be below 60 dB.
- 4.11 On this basis, it is concluded that noise from delivery activity during the day would not cause significant adverse effects on local residents.
- 4.12 Should night time activity be required then it is recommended that mitigation measures, including acoustic screening along the southern boundary of the site should be implemented as part of a noise management plan. The provision of a noise management plan can be controlled through a planning condition similar to that imposed on the existing outline consent.
- 4.13 Subject to mitigation measures that can be included in the design of the site, and potential restrictions on operating hours it is concluded that noise from proposed business units will not cause significant adverse impacts in line with the policy aims of the NPPF.

5.0 Conclusions

- 5.1 In line the approach taken at the outline planning consent, mitigation measures, including physical and operational measures, can be incorporated into the scheme through a noise management plan which would reduce to a minimum any potential adverse impacts
- 5.2 It is therefore concluded that subject to conditions, similar to those imposed on the existing outline consent, that the site can be developed as proposed in line with the policy aims of NPPF (paragraph 198) and planning practice guidance.
- 5.3 Taking into account the above it is therefore concluded that if granted the proposed development will not compromise the Governments' noise policy vision, as stated in the Noise Policy Statement for England and National Planning Policy Framework.

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