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Seacourt Tennis Club
Hayling Island
PO11 9AU

73 Westman Road
Winchester
Hampshire
SO22 6DX

01962 461016
0203 8650332

VA4834 SEACOURT TENNIS CLUB, HAYLING ISLAND

Council Response Regarding Padel Noise

A. Introduction

We have reviewed the comments provided by the Environmental Health Officer (EHO) regarding the noise assessment conducted for the proposed padel courts. Our responses to these comments are detailed below. We believe that our report adheres to best practices and current guidelines, indicating that the proposed development is expected to result in acceptable noise levels and not significant adverse impacts on health and quality of life.

Of note is that the EHO comments of an unacceptable assessment are based on their understanding that internal noise levels were inappropriately assessed against WHO guidance. However, the submitted reports do not include an assessment of internal noise levels or a reference to WHO, rather assessing external noise levels against the best available British guidance. The comments do not appear to note the context of the specific site, which is an important consideration for this scheme.

B. NPPF and Noise Pollution

EHO Comment: Paragraph 180 of the NPPF mandates that planning decisions should prevent new and existing developments from contributing to or being affected by unacceptable levels of noise pollution. Decisions should also ensure that new development is appropriate for its location, considering the likely effects of pollution on health, including cumulative effects.

Response: We would offer that being part of an existing tennis club, the padel courts are appropriate to the location. Our assessment, conducted in line with best available practices, indicates that residents are expected to experience noise levels within acceptable limits. Mitigation measures have been proposed to minimise the impact as far as practicable. The assessment complies with Paragraph 180 of the NPPF, mitigating significant adverse impacts on health and quality of life.

C. Government Planning Practice Guidance on Noise

EHO Comment: Guidance specifies that development should be avoided where noise is disruptive. Disruptive outcomes can include changes in behavior or diminished quality of life due to noise.

Response: Our report concludes that, based on best practice assessment, the padel courts are not expected to significantly alter the acoustic character of the area, which already includes tennis

activities. The predicted sound levels are at levels that meet guidelines and are not expected to lead to material changes in behaviour.

D. Factors Influencing Noise Concerns (Paragraph: 006 Reference ID: 30-006-20190722)

EHO Comment: Regarding factors that could influence whether noise could be a concern:

Response:

- **Source and Absolute Level of Noise together with the time of day it occurs:** Noise occurs during the daytime and at levels indicated as acceptable by relevant guidance. Times of operation can be controlled through condition.
- **Existing Sound Environment:** The current noise climate of the tennis club is has been discussed.
- **Frequency and Pattern of occurrence:** The activity would occur frequently but within predictable, controlled times of day.
- **Spectral Content and General Character:** While it is accepted that the padel courts have a different sound profile to tennis due to the different ball and the presence of screens, the overall character is in keeping with the context of the location.
- **Cumulative Impacts:** The assessment considers both padel courts in use simultaneously, with cumulative noise levels indicated as acceptable.
- **Existing High Noise Level:** Not believed to be applicable to this site

E. Internal Sound Levels and WHO Guidelines

EHO Comment: *Essentially, the noise from the court (with mitigation measures in place) is said to be acceptable because the noise would not exceed acceptable internal domestic noise levels with a window partially open for ventilation. Acceptable internal noise levels are based on the World Health Organization 1999 Guidelines for Community Noise.*

Response: The report for this site does not reference WHO Guidelines for internal sound. The report shows compliance with the Sports England Guidelines for external areas. In the absence of specific guidance for the assessment of padel courts, this approach has become the typical assessment methodology employed by many consultants and accepted by several councils.

It should be confirmed that the correct report was reviewed in making these comments.

F. Witnessing and Characterizing Padel Court Noise

EHO Comment: The noise from padel courts, especially impact noise, should be witnessed and properly characterized.

Response: The data used in the report was obtained while witnessing a padel game in play at the West Hants Tennis Club, Bournemouth. A review of several other reports by others submitted for other padel court schemes (including the data used by the neighbour's consultant in objecting to this application) shows similar overall noise levels and confirms the subjective description of the character of the noise. In general, most reports support the discussed nature of the sound, being slightly different to tennis noise in subtle yet noticeable ways but broadly being characterised as sufficiently similar to not alter the overall acoustic environment.

G. Cumulative Effects of Existing Noise Environment

EHO Comment: The cumulative effect of existing noise (tennis court use, road traffic, etc.) plus padel court noise should be assessed.

Response: Due to their distinctly different natures and sources, we do not believe that it would be appropriate to combine road traffic noise with racquet sports noise in undertaking an assessment. However, if required, we would be able to provide a combined level from concurrent tennis and padel court noise.

H. Noise Abatement and Statutory Nuisance

EHO Comment: Reference to Noise Abatement Notices served on other padel courts under the Environmental Protection Act 1990 was noted.

Response: While recognising this possibility, all noise sources risk causing disturbance if not adequately assessed. Previous complaints from other, unrelated schemes are not in itself sufficient justification for refusal. We emphasise that our assessments are designed to meet reasonable noise levels following best available practice. However, the determination of statutory noise nuisance is subjective and without objective criteria provided by the council, the risk of action remains despite adherence to best practices.

I. Conclusion

We believe the noise assessment provided indicates that the proposed padel courts are expected to operate within acceptable noise levels, meeting the intents of national planning guidance. The report follows established guidelines and methodologies to show this.

The importance of considering the context of the site is highlighted, with the applicants taking measures to minimise the impacts on neighbours as far as practicable, through both engineering solutions and managerial controls.

We would welcome to address any remaining concerns or to provide additional data as needed.

Yours sincerely
on behalf of Venta Acoustics

Steven Liddell

email: sliddell@ventaacoustics.com