

Planning Application Reference: APP/26/00284

Description: Change of use from residential dwellinghouse (Use Class C3) to Day Nursery (Use Class E), including alterations to the kerb to enable an "in and out" system, construction of new store building to the rear boundary, and new acoustic fencing.

Location: 102 Bedhampton Road, Havant, PO9 3EZ

The Sound Planning document entitled 'Noise Impact Assessment v1.3 | 102 Bedhampton Road, Havant | Project Number: J 06404' (dated 15th September 2026) has been reviewed. There are several issues with the report that bring the reliability of the findings into question including the following issues regarding the assessment of the type of noise source and determination of potential impact at receptors.

1. The use of a steady SWL figure is not necessarily representative of the noise source as noise from children would be expected to have an undulation or intermittency with L_{Amax}/peak events that are not represented in the report. Paragraph 2.8.3 includes an excerpt from WHO guidelines which outlines assessment parameters including that the capacity of a noise to *"induce annoyance depends upon its physical characteristics...intermittent noise, it is emphasized that it is necessary to take into account both the maximum sound pressure level and the number of noise events"*, however these principles have not been applied in the assessment.

2. The noise model assumes attenuation provided by a 2m boundary fence. However, insufficient information has been provided regarding the fence specification, condition and acoustic integrity to demonstrate that the degree of screening assumed by the model would be consistently achieved in practice. It is also noted that the site photograph in appendix 3 shows line of sight to the top of a doorway of what appears to be a neighbouring outbuilding. The photograph therefore suggests the barrier may not fully interrupt line of sight to all potentially sensitive receptor locations.

3. The model treats the play area as a uniformly distributed area source located at 0.5m above ground level. In reality, children are unlikely to be distributed evenly across the entire garden and may congregate in particular locations depending on activities, supervision arrangements and play equipment. This could result in periods where groups of children are closer to particular boundaries or where effective screening from

fences is reduced, potentially producing higher sound levels than those predicted by the simplified model.

4. The report states that SoundPLAN Essentials implements ISO 9613-2, CRTN and CRN propagation methodologies, however it is unclear from the report which specific propagation methodology has been applied within the model and whether all model inputs and assumptions are appropriate for the assessment of noise from children's outdoor play activities.

5. The assessment assumes that children would only use the outside area for 45 minutes in any hour. Whilst it is understood from the submitted Noise Mitigation and Management Plan (NMMP) that different cohorts may use the outside play area for up to 45 minutes, the NMMP does not state that there would be a 15-minute period before the next cohort would use the outside play area. It is understood from the NMMP that the outside play area may be in continuous use between 09:00 to 16:00 except for lunchtime between 12:00 - 13:30. The 'time on' adjustment may therefore not be representative of the operating regime detailed in the NMMP. Furthermore, any baseline noise measurements should be representative of the operational times and should not be based on typical noise levels between 07:30 and 18:00.

6. Whilst the report finds that noise from the play area is predicted to be 49dB LAeq vs the measured typical ambient of 54dB LAeq,T (08:00 - 18:00) this does not:

a) account for periods of undulation in the noise source noise or variation in ambient noise levels and whether there could be periods where source noise exceeds ambient, and

b) the Sound Pressure Level time history graph shows that the LA90 is quite steady around 40dB. On the basis of the report findings, noise from the play area would consistently be in the region of 9dB above background. Whilst BS4142 excludes noise from people or recreational activities, the report does not adequately address the significance of this factor or the potential for resultant disturbance to neighbouring occupiers.

7. The assessment does not consider impact to garden areas which is likely the area where receptors would be most affected during fair weather periods.

8. There is a lack of information to demonstrate that the source input data is representative of the application. The assessment is based upon previous measurements of 20 children playing at a different site. However, no information is provided regarding the nature of that site, the age of the children, the activities being undertaken, the measurement methodology, whether the source data represents average or worst-case conditions, or whether the data are representative of this proposal.

9. The noise assessment is based upon a maximum of 12 children in the play area at any time however the NMMP refers to up to 16 children aged between 3 and 4 in the garden at any one time.

Without submission of a revised assessment addressing the above matters and providing a robust assessment of the noise source, potential impacts on residents and appropriate mitigation measures where required, Environmental Protection has outstanding noise concerns.

Kind regards,

Craig Milligan

Environmental Health Officer

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