

To: Giles Rawdon

From: Steve Skingle

Company: Hinckley and Bosworth Borough Council

SLR Consulting Limited

cc: Emma Baumber

Date: 24 November 2025

Project No. 410.066282.00001

**RE: 25/00931/FUL Cliffe Hill Farm, Little Shaw Lane, Markfield LE67 9PP
Consultee Commentary Response – Noise**

Introduction

A noise impact assessment (herein “the submitted assessment”)¹ was provided in support of planning application reference 25/00931/FUL within Hinckley and Bosworth Borough Council (HBBC), for the following proposed development at Cliffe Hill Farm, Little Shaw Lane, Markfield, Leicestershire LE67 9PP:

“Development of a logistics park for storage and distribution (Class B8), general industry (Class B2), ancillary office space (Class E) and associated infrastructure”

Consultee comments have been received on behalf of HBBC Environmental Services Pollution Team². This memorandum has been prepared on behalf of the Applicant, to address those consultee noise comments with respect to the submitted assessment.

This document has been authored and checked by Suitably Qualified Persons as defined in Closure. Whilst reasonable effort has been made to ensure that this report is easy to understand, it is technical in nature.

Commentary Detail

Basis of Report

“The noise report is based on assumptions and so the conclusions reached can not be guaranteed and as such the following comments are intended to maximise protection of residential amenity from noise.”

The purpose of the submitted assessment was to inform noise impacts from the proposed development, based on referenced methods applicable to the nature of employment uses. The realised impacts were considered against the overarching requirements of planning and noise (NPPF, NPSE, PPG-Noise). The approaches used relate to various similar uses, Sites, planning approvals and existing development across different Boroughs in England.

Consultee comments stated they have been provided to “*maximise protection of residential amenity from noise*”. This goes much further than the aims of the NPSE or PPG-N, to “*avoid significant adverse impacts on health and quality of life; mitigate and minimise adverse impacts on health and quality of life*”. The aims of Consultee Commentary are therefore conservative in exploring the extent of what could be possibly used to “*maximise protection*”.

Clearly, a balance needs to be achieved in the planning process between what is reasonably required by the Applicant with respect to noise mitigation measures when following

¹ Employment Use Development Noise Impact Assessment. Land at Junction 22 of the M1, Cliff Hill Farm. 410.066282.00001 Revision 3.0. SLR Consulting Limited, 12 September 2025.

² Comments were submitted at 24/10/2025 3:49 PM from Mr Giles Rawdon on behalf of HBBC ES Pollution 2.

overarching planning guidance, as opposed to the maximisation of every possible noise mitigation measure which could be adopted, but might not necessarily be required.

Attention is drawn to Table A of the submitted assessment, describing Planning Practice Guidance Noise Exposure Hierarchy (as available online³), for predicted noise effects and appropriate actions. Adverse or significant adverse impacts were not indicated therefore the realised actions have been provided commensurately with the proposed noise effect.

With respect to “*guaranteed*” results, it must be understood that informing noise impact from the proposed development requires a level of *reasonable assumption* to be made given that the end occupier of the development will remain unknown through the planning process. This was realised in Section 2.2 of the submitted assessment, alongside activities which have been considered in the cumulative assessment of environmental noise impacts.

“For employment use development of this nature, exacting operational information has been considered to remain largely unknown given the potential variation between future operators. Some level of reasonable assumption has therefore been necessary in forming noise impact assessment for the employment use scheme.”

Noise Modelling

Noise modelling was used given the geometrical complexity and quantity of noise generating sources during different times, in relation to closest noise sensitive (residential) receptors in different orthogonal direction to the proposals. Assumptions were documented so predicted effects could be traceable and repeatable.

While not highlighted within the submitted assessment, noise modelling was also used to inform early layout iterations of the scheme masterplan. The design and layout of the proposed scheme have therefore been considered and optimised from an early stage with the consideration of potential noise impacts. This has supported a considerate layout, with areas of potentially greater noise-generating activities (e.g. loading areas, plant compounds or carparks), being reasonably positioned away from neighbouring noise-sensitive land uses. These ‘embedded’ noise mitigation measures have been duly reflected in the proposed scheme masterplan.

The following comments relate specifically to noise modelling, and a response has been provided against each comment provided.

“The noise contours from the model should be submitted.”

Further noise modelling outputs have been developed further to consultee comments. Please see Figure A, Figure B and Figure C of this memorandum. Note these contours have been drawn using a 10 m x 10 m grid, above a relative (future) ground height within the Site and existing contours outside of the Site. The predicted noise levels remain significantly below an acceptable level at all sensitive receptors.

“It needs to be confirmed by the applicant that the assumptions of the noise report are accurate to the proposed development. This is particularly important for section 5.1.4.”

The submitted assessment has been coordinated with information drawn upon from the wider design team, including architectural layouts as well as technical works provided by geotechnical, mechanical and transport consultants. This process has been further developed and reviewed by the Applicant in the formation of this technical memorandum.

Section 5.1.4 of the submitted assessment concerns a basis for indoor noise levels of buildings. Noise modelling has assumed that every square metre of industrial buildings

³ https://assets.publishing.service.gov.uk/media/5d39a87ce5274a4010e33fef/noise_exposure_hierarchy.pdf



would be noise generating from façade wall and roof components to define noise breakout. This remains a conservative assumption. It must be acknowledged that *some level of assumption* is necessary to define the potential noise breakout from proposed employment use buildings.

There could be no single value associated with the indoor noise level during occupancy, given the potential range of activities which could be relevant to an unknown, future occupier. A reasonable assumption has therefore been based on 70 dB $L_{Aeq,T}$ occurring immediately inside each façade and roof of each proposed building based on SLR library data and measurements inside employment use buildings. This assumption would allow much higher indoor levels within each building given the floor area of each employment use building. The upper limit of which would generally be a concern for the Control of Noise at Work Regulations, whereby any future employer would have a duty to reduce the employee's exposure to noise as far as reasonably practicable.

The indoor noise level associated with storage and distribution would be reasonably much less than the assumed value. This is because storage areas and racking are typically non-noise generating, except typically for reach trucks, packaging or distribution areas. General industrial uses could have a much wider indoor noise generation however given the scale of the proposed employment use buildings; the assumed indoor values have been viewed possible to permit a wide range of general industrial activities contained within each building.

Baseline façade estimates of 27 dB R_w and 24 dB R_w have been modelled for respective roof and wall systems, to protect against a moderate level of internal industrial noise within each proposed unit. These sound insulation values have been considered conservative and remain relative to indoor ambient noise assumptions. i.e. it would be readily possible to insulate against a higher level of indoor sound through uprated façade specification. The submitted assessment highlighted in Section 5.1.4 that the *“general sound reduction index of metal insulated roof, wall and façade systems has been noted from one proprietary manufacturer⁵ in the region of 23 – 58 dB R_w ”*. Clearly, there is a provision to protect against higher indoor ambient noise levels, if necessary. Greater levels of indoor sound insulation could be achieved with inner linings as highlighted in the provided, proprietary reference⁴.

“In terms of noise break-out, any Kingspan panel will give about 25dB(A) sound reduction for typical industrial process noise (e.g. bottling plant). This can increase to typically 50dB(A) if the panels are lined with plasterboard. These are useful reductions which can be used to control noise break-out.”

Break-in calculations (outside of planning and for BREEAM Credit Hea 05) have highlighted that *minimal* façade specifications of 30 dB R_w would be required for Units 3 and 4 adjacent to the M1 Motorway. This would be to ensure suitable levels of indoor amenity within workshop areas. Higher levels of sound insulation would be conducive to office uses and relate substantially to curtain wall, glazed elements.

The project architect has provided further information on likely sound insulation of proposed façade wall and roof components using product specific data from CA Group⁵. This technical document highlights the following information as design intent for the proposal:

- Walls 42 dB R_w .
 - Twin-Therm® Wall Incorporating 0.5mm thick External Wall Profile
- Roof (including roof lights) 34 dB R_w .

⁴ Acoustic Performance Guide – Insulated Roof, Wall & Façade Systems. Kingspan, 2005.

⁵ Technical Information Paper TIP-401 Acoustics, Revision 5.1. CA Group, November 2023.



- Twin-Therm® Roof Incorporating Therma-light Rooflight. T-light 17 1000 Liner Rooflight CE24 (2.44kg/lm) – Intermediate Core – T-light 32 1000 CE18E.

Clearly therefore, the conservative assumptions of 27 dB R_w and 24 dB R_w used to represent noise breakout within the noise model fall at the lower end of the available façade systems and below the proposed design intent. These specifications were initially provided to protect against a reasonable amount of noise breakout from expected indoor uses to permit a wide range of general industrial activities. The intended specifications would allow higher indoor sound levels and therefore should reasonably cover all reasonable situations which could be considered for future occupancy at the Site, to allay noise concern over this factor.

If necessary to grant planning approval, a minimum façade specification could be provided for any employment use building to protect against noise breakout, where the Applicant should have sight of such condition. It should also be borne in mind that the specifications of façade components do not remain exclusive to the acoustic design (where factors such as final U-Values to achieve BREEAM credit ratings will need to be duly coordinated).

“Section 5.1.2 – how has the assumption regarding forklift truck movements been reached?”

The data used for forklift movements has been extracted from SLR’s library of similar situations, based on forklift unloading of an HGV in a loading bay. In this regard the data is realistic and aligns with a witnessed quantity of forklift movements. These were assumed during different times where the greatest quantity would be expected during the day. Even if a forklift was always considered in continuous operation, as a tendency towards the worst-case, then noise modelling of this scenario has shown there would be no meaningful difference in the provided outputs (i.e. < 1 dB). This is because the design of proposed employment uses has included embedded mitigation with layout, facing of external service yards away from noise sensitive receptors.

“Section 5.1.4 states This assumption would be assisted with the express use of automatic loading doors on all proposed units it needs to be detailed if this has been applied to the design of the buildings; if not, how does this affect the conclusions reached.”

The acoustic model has considered docking and loading doors to the front of each unit. The acoustic performance of these doors has been conservatively remodelled with an 8 dB loss from indoor to external areas, to a height of 4 m. This remains a conservative assumption when closed. It should be noted that docking bay doors would normally remain closed or attached to a vehicle, therefore would never be considered normally open.

If all loading and docking bay doors were left open during the night, then additional modelling has indicated an acoustic effect in the region of 3 dB above the predicted sound levels. However, this would be considered an unrealistic scenario and would ultimately depend on the level of sound contained immediately within the loading or docking bay door. The above-quoted comment on the use of automatic closers on loading bay doors was to reduce the likelihood that any loading bay door could remain normally open as to allow unreasonable increase in the external noise climate from the breakout of indoor noise.

“Consideration is required on the impact from noise on external amenity areas of the adjacent residential premises.”

Modelling contours have been recalculated at 1.5 m height alongside the façade predictions as previously reported. It shall be observed that the consideration of noise in external amenity areas, at 1.5 m above relative ground level, typically poses lower sound levels than assessed at first building façades. Consequently, when considering the noise impact on external amenity areas of the adjacent residential premises, the updated noise modelling shows no adverse impacts given sound levels appreciably below the submitted assessment.



This situation is likely in amenity spaces because there is less topography to screen any proposed noise sources when viewed from a first-floor window. For this reason, the predictions were robust when accounting for different heights beyond an amenity space.

“It needs to be confirmed if the noise model included the proposed acoustic fence adjacent to the egress road and also included the raised landforms (e.g. topsoil mounds).”

The model imagery key (provided in Figures E to G of the submitted assessment) clearly highlighted the location of the noise barrier as a thick, blue line. It is confirmed that this element has been included in all model iterations.

Existing landforms have been based on Lidar composite DTM (1 m resolution)⁶ and converted to shapefile using QGIS software for manipulation in noise modelling software.

Proposed landforms have been based on detailed finished levels provided by Burrows Graham⁷. These have been converted from 3D AutoCAD drawing imported into the noise modelling software with 1 m height resolution. Figure A, Figure B and Figure C of this memorandum have been shown with contours hidden to avoid confusing imagery.

Noise Modelling Update

It must be noted that where all comments have been accounted for, there remains no meaningful difference between the levels reported within the submitted assessment and as shown in Table A below. i.e. the highest specific sound level does not change and therefore the assessment of noise impacts would remain as submitted.

Table A: Specific Sound Levels - Updated

NSR Ref	NSR Name	Predicted Specific Sound Level dB $L_{Aeq,T}$		
		07:00 – 19:00	19:00 – 23:00	23:00 – 07:00
A	White Hill	41	39	39
B	White Hill Lodge	37	36	36
C	Coalbourn Cottage	39	36	36
D	White Hill	42	37	38
E	Forest Edge	42	40	40
F	Weavers Cottage	46	39	40
G	Old Mill Farm	46	40	40
H	Halls Farm	41	36	36
I	198-200 Little Shaw Lane	38	35	35
J	Holly Hill Farm	41	38	39
Highest value at any NSR		≤ 46 *	≤ 40 *	≤ 40 *
* No change from previously reported.				

The above sound levels must be considered in context. The location of NSRs about the junction of the M1 motorway and A50 dual carriageway results in background and residual sound levels typically much higher than those predicted from the proposed development. Attention is therefore drawn to Section 5.4 Context of the submitted assessment.

⁶ Available from <https://environment.data.gov.uk/survey/>

⁷ Drawing No. 30206-BGL-XX-XX-DR-C-00200. Revision P07. Burrows Graham, 26th June 2025.



Subjective effects from these emissions have been summarised with respect to overarching planning guidance per Section 6.2 of the submitted assessment. The range of noise impacts for the proposed development remain acceptable and furthermore given the additional clarifications of this memorandum, would remain conservative to the proposed development.

Figure A: Specific Sound Levels, Highest dB LAeq,T at Building Façades – Daytime

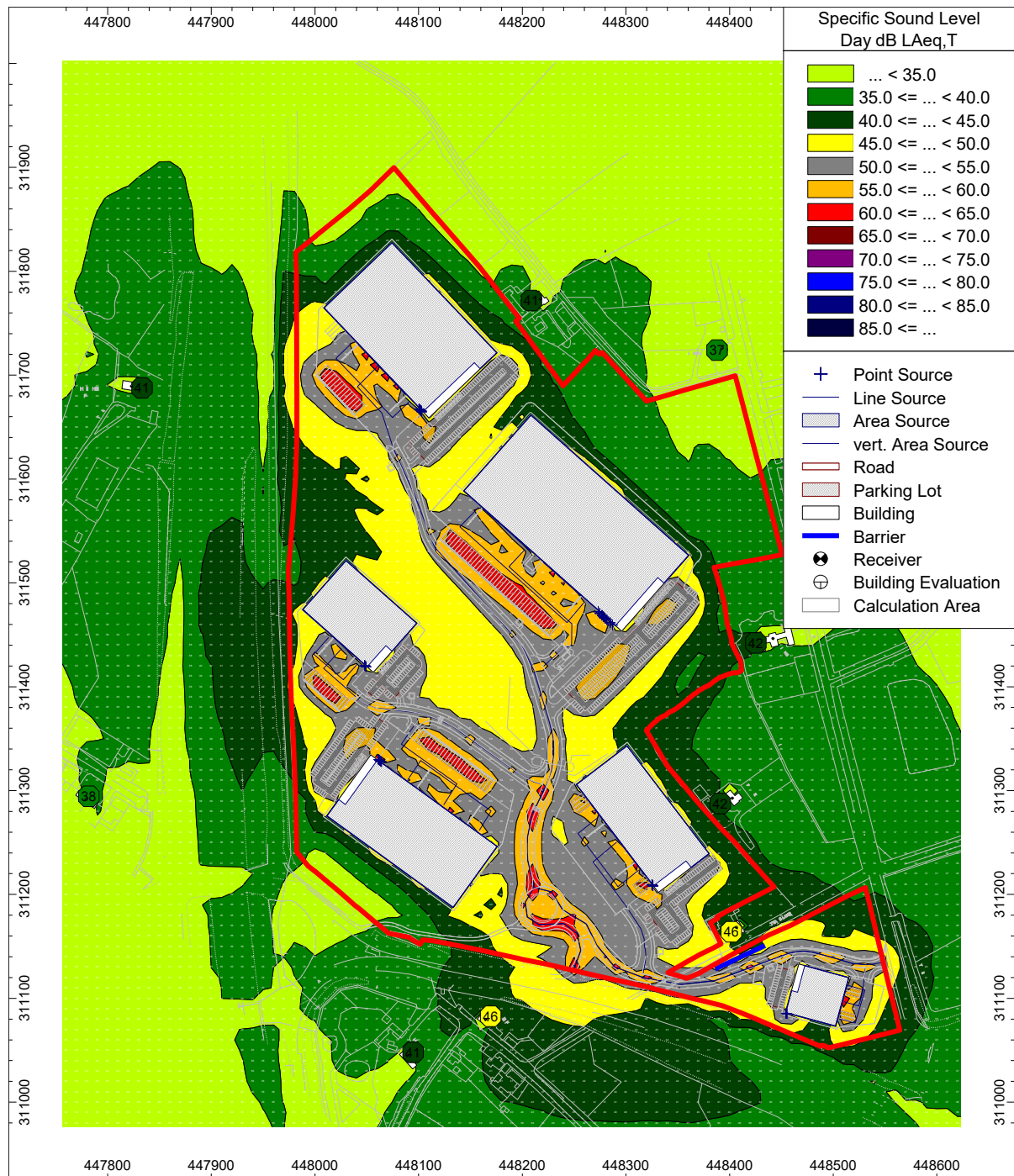


Figure B: Specific Sound Levels, Highest dB $L_{Aeq,T}$ at Building Façades – Evening

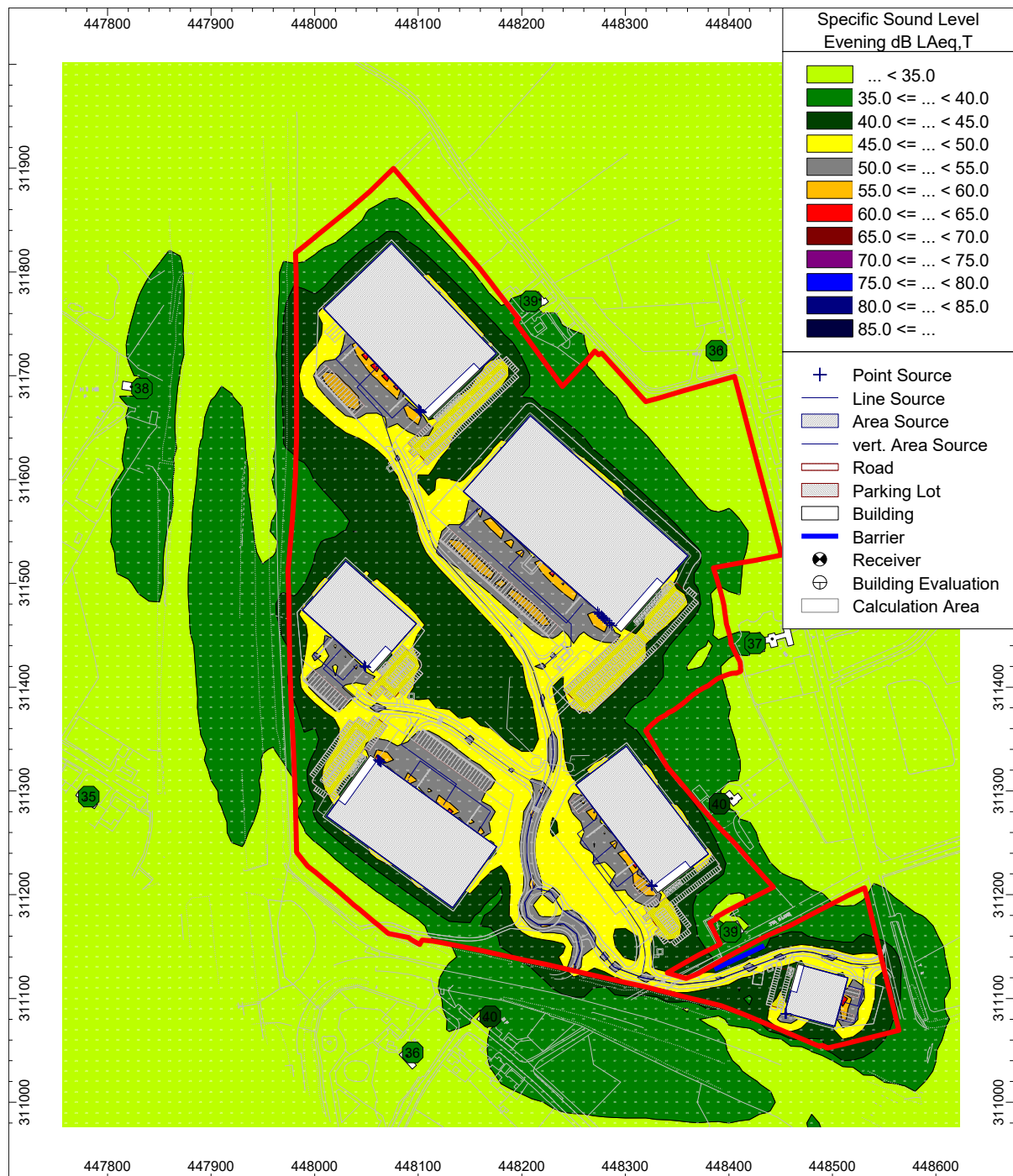
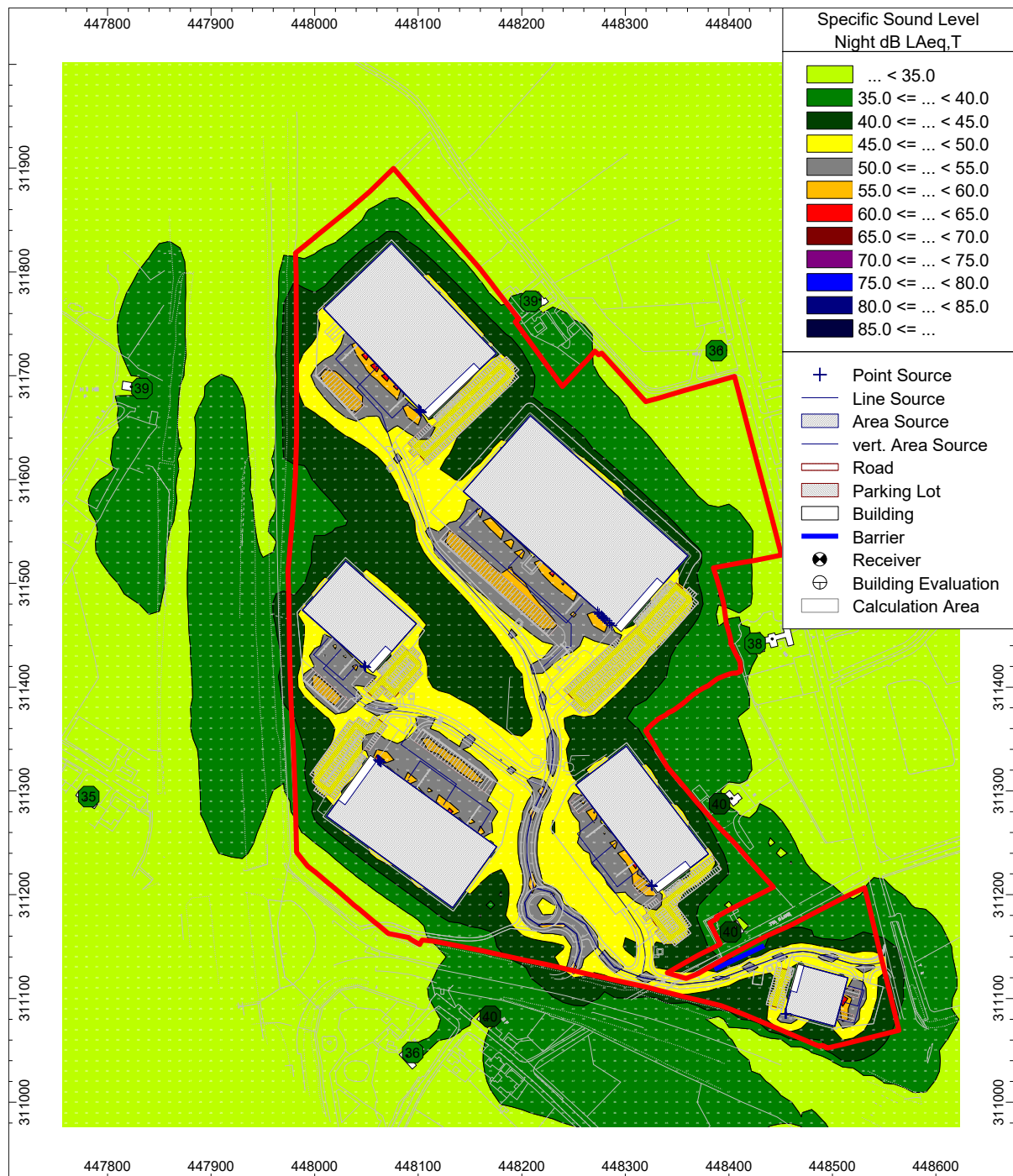


Figure C: Specific Sound Levels, Highest dB $L_{Aeq,T}$ at Building Façades – Night



Use of Conditions

Mechanical Plant

“A suitably worded condition will be required to ensure the assumptions made within the report regarding external plant are equal to the final choice of plant.”

The above-listed commentary remains agreeable, in part, to ensure any condition constrains noise from externally positioned or emanating plant items.

It must be appreciated however, that the submitted assessment has been based on design stage information provided by project mechanical consultants but cannot be binding to eventual, external plant items. There remains a future detailed design process to be followed at the next design stage and furthermore, a tender process to be followed for the procurement of mechanical plant items. Therefore, some variation in plant should be reasonably expected and allowable. The acoustic emissions would not be expected to vary by any significant degree through equivalent plant quantities or selections.

The following planning condition for external plant (however appropriately worded) would remain agreeable, as necessary. Note alongside, that BREEAM Pol05 has otherwise been targeted by the scheme which dictates a performance standard for the rating sound level to be 5 dB below the background sound level. A specific planning condition to control mechanical plant noise levels could therefore be viewed unnecessary on this basis.

- A suitably worded condition concerning external plant and equipment in relation to the final choice and relationship to background sound level per BS 4142 (and not as bound to the submitted report regarding external plant).

Noise Barrier

Further commentary has highlighted for details of the noise barrier (acoustic fence) to be secured by condition. This would remain generally agreeable with respect to eventual product selection and detailing, to be submitted prior to occupation.

“The design detail of the proposed acoustic fence (e.g. density) will need to be submitted or submitted as part of a suitably worded condition.”

It must be understood that the acoustic design of a noise barrier assumes a minimum mass per unit area of 10 kg/m² to align with the prediction methodology of ISO 9613-2. This, along with an imperforate form and at least 2.0 m height was considered in noise modelling. Any appropriate noise barrier would therefore need to accord with these minimum requirements.

The Applicant has added this acoustic fencing detail to the Proposed Boundary Treatments Plan⁸ to avoid the need for a specific condition.

Further Commentary

Further commentary on the use of conditions generally falls within the aims of the consultee response *“to maximise protection of residential amenity from noise”* and therefore is outwardly queried with necessary to planning.

There must be some reasonable consideration to the context of this site as located at a junction of major road infrastructure M1 / A50. In this regard, while additional controls have been provided, it remains that a balance needs to be sought, where every possible noise control measure may not remain necessary to planning in this instance.

“Other similar developments that are close to residential have included a noise management plan within the application detailing noise management techniques that will

⁸ UMC Architects Drawing: 24473-UMC-ZZZZ-ZZ-DR-A-0702, Revision C04. Updated 19th November 2025.



be used on site to limit noise; this should be included for this application. Such plans include, but are not limited to:

- *Loading bays e.g. sealed loading bays*
- *Roll cages e.g. use of anti-vibration matting.*
- *Reversing alarms (vehicles and fork lift trucks e.g. broadband alarms where possible)."*

While a noise management plan would constitute best practicable means for control of noise, it could be agreeable if necessary to gain approval. It should be borne in mind some of this could be unnecessary for an individual, future operator notwithstanding a noise management plan:

- Loading docks would be normally closed or attached to a vehicle.
- Roll cages might not be applicable (this is not a supermarket).
- The Applicant commonly dictates and accepts controls for reversing alarms.

The last point is then a safeguarding condition for environmental noise. Although the details of the suggested condition appear to be onerous to development, technically difficult and unworkable should it be applied.

- It would be unclear how the suggested condition could apply to a proportion of the scheme given there would not be a single operator for all units. It would be technically difficult to apportion limits for a single operator amongst the range of units.
- The suggestion is devoid of specific targets to be achieved and restricts sound levels to those predicted in the submitted noise assessment. Given the low level of noise predicted from the development, this is not reasonable as louder levels could be allowable without no meaningful effect to a noise sensitive receptor.

The following is therefore not agreeable as technically unworkable and non-specific.

"In addition, the following conditions have been used on similar developments and consideration is recommended on including in any permission granted.

1. a) Within 28 days from the receipt of a written request from the local planning authority, the operator shall, at its own expense, employ an independent consultant to assess the level of noise emissions from the operation at an agreed location following a procedure to be agreed in writing prior to the commencement of development with the local planning authority.

b) Details of the assessment and its results as to whether the predicted noise levels detailed in the noise report submitted as part of the application have been exceeded shall be reported to the local planning authority as soon as the assessment is completed.

2. a) Upon notification in writing from the local planning authority of an established exceedance of the noise levels detailed in the noise report submitted as part of the application, the operator shall, within 28 days propose a scheme to the local planning authority to mitigate the exceedance to prevent its future occurrence, including a timetable for its implementation.

b) Following the written approval of the scheme by the local planning authority it shall be activated forthwith and thereafter retained."

It would otherwise be expected that any future operator would have a degree of noise and environmental control imposed on them through tenancy lease agreements. These may go some way to allay fears over potential noise emissions from this scheme.



Closure

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with Caddick Developments Limited (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

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Suitably Qualified Persons

The assessment has required a suitable level of technical ability and has been undertaken by a Suitably Qualified Person (SQP). An individual with all the following credentials has been considered a SQP for this assessment:

- Has a minimum of three years' verifiable experience (within the last five years) of providing building acoustics design advice. Such experience has clearly demonstrated a practical understanding of factors affecting acoustics in relation to the proposed development use and in the built environment in general, including acting in an advisory capacity to provide recommendations and design advice, and;
- Holds a recognised acoustic qualification and membership of an appropriate professional body. The primary professional body for acoustics in the UK is the Institute of Acoustics.

This assessment has been led and managed by a SQP as defined above.

The SQP confirms that the relevant measurements and calculations:

- Represent good industry practice in accordance with available guidance.
- Are appropriate given the development being assessed and scope of works proposed.
- Avoid invalid, biased and exaggerated claims.

The checker and author of this document confirm that they both comply with the definition of a SQP defined in this Section.



Regards,

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