BIDWELLS

Your ref: S/RRA/SNR
Our ref: St Neots Road, Dry Drayton
DD: [redacted]
E: [redacted]
Date: 23/09/2026

Greater Cambridge Planning Policy
Via Email

Dear Sir / Madam

EMERGING GREATER CAMBRIDGE LOCAL PLAN REGULATION 19 CONSULTATION – DRAFT ALLOCATION S/RRA/SNR: LAND TO THE NORTH OF ST NEOTS ROAD, DRY DRAYTON

This representation has been prepared on behalf of Paragon Land & Estates Ltd (hereafter "Paragon") in relation to their land interests at draft allocation S/RRA/SNR: Land to the North of St Neots Road, Dry Drayton (the "Site"). This also follows on from the representations made to the Regulation 19 consultation earlier this year.

Paragon is supportive of the draft allocation for employment uses in the emerging Local Plan which recognises that the Site is available, achievable and deliverable. Further, it is acknowledged the need to ensure that development across the Site does not prejudice the delivery of the recently approved Cambourne to Cambridge Busway nor East West Rail. The Site remains available for residential uses should the Council wish to discuss that opportunity.

However, Paragon objects to the draft policy wording, in particular the restriction of Use Classes across the Site to office (E(g)(i)), research and development (E(g)(ii)) and light industrial (Class E(g)(iii)) which we believe is unjustified.

Whilst it is acknowledged that the Site has previously been promoted for the proposed allocation uses, the market has materially moved on since this time, and therefore the range of allocated uses should be expanded to include B2 industrial and B8 storage and distribution. The reasons for which are set out below.

Council's Response to Regulation 18 Consultation

The Council has prepared a document entitled "Consultation Statement - Appendix 7: Response to Representations – Site Allocations, which provides their responses to representations made in relation to sites proposed for allocation, such as Paragon's site known as "S/RRA/SNR".

The Council states that they do not propose to include B2 and B8 uses in the draft allocation as:

- The need for uses is met elsewhere, and
- Due to proximity to residential uses, there is potential for noise to have an adverse impact on amenity.

Taking each point in turn:

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Need for Warehouse Uses Being Met Elsewhere

It is not considered sufficient to simply state that warehousing is met across other allocations. In fact, paragraph 86 e) of the examining Framework clearly states that policies should "*be flexible enough to accommodate needs not anticipated in the plan and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances."* Clearly, seeking to curtail an employment allocation purely on existing evidence and limiting its flexibility would run contrary to this paragraph.

Whilst we acknowledge that this Plan is not being examined against the plan-making policies of the new NPPF (2026), it is important to consider its changes and why they were made.

New Policy E1 states that "*to support business investment and employment, development plans should, at the most appropriate level [….] 2. Given changing commercial property requirements, development plans should not be overly prescriptive about the types of uses or unit sizes that would be acceptable on particular sites (other than where there is a clear and justified rationale for being specific about acceptable uses at the plan-making stage)."*

The government's summary paper published alongside the December 2025 consultation on the Framework provided information as to why changes were proposed[1]. Under Policy E1 the government elaborated that it was redrafting elements of NPPF 2024 paragraphs 86 and 87 to make it "*clearer that, in allocating sites, plans should avoid overly prescriptive requirements on acceptable uses, enabling flexibility to respond to changing commercial property demands."*

It would appear, based on the feedback in the Council's consultation report, that the primary reason the Council is seeking to limit the use is noise. As such, Paragon, has engaged with an Acoustic Consultant to provide evidence to support greater flexibility, the findings of which are set out below.

Noise – B2 and B8

Heyda Acoustics has prepared the appended Noise Impact Assessment (**Appendix 1**). The findings of which are clear there are no in-principle reasons why the flexibility sought in policy terms that B2 and B8 uses cannot be secured on this Site subject to detailed design and considered mitigation. As such, we propose that the development management process is used to ensure that amenity is protected in the future.

As such, whilst Paragon does not feel it necessary, they would be agreeable to the proposed allocation having an additional limb added requiring the submission of a noise impact assessment with any future application.

Greater Demand and Industrial and Logistics

Since the Site was first promoted for the uses allocated in the draft policy, there has been a greater recognition of the demand for industrial and logistics warehouse space across Greater Cambridge.

[1] National Planning Policy Framework: proposed reforms and other changes to the planning system

The Council has considered this further within its Greater Cambridge Warehouse and Industrial Space Needs Assessment which was prepared by Iceni (March 2025). Table 6.4 of the report identifies indicative land requirements as shown below:

Table 6.4 Indicative land requirements by type and location

Type	Proportion of total	Floorspace (sq.m)	Unit sizes (sq.m)	Location
Manufacturing /advanced manufacturing B2	15%	48,000	500 – 5,000	Cambridge commutable
General Industrial B2/B8/E(g)	10%	32,000	500 – 2,500	Urban / urban fringe
Wholesale and trade	10%	32,000	100 – 2,000	Typically urban / urban fringe (trade)
Distribution B8	40%	127,000	2,000 – 5,000+	Strategic Road Network (SRN)
Mid-tech B2/B8/E(g)	10%	32,000	100 – 2,000	Enhanced connectivity to labour market, being urban fringe or science park proximity
Other uses i.e. leisure	15%	48,000	500 – 2,500	Prefer urban / urban fringe
Total	100%	317,000		

Source: Iceni Projects (may not sum due to rounding)

This sets out a significant need for warehouse space to satisfy several different functions (residual need of 197,000 sqm). Table 7.5 of the same report further considers existing supply and the approach to distributing need by warehouse / industrial typologies:

Table 7.5 Land recommendations by type and location (notional) (sqm)

Type	Notion-al need by type (sq.m)	Supply + completions (sq.m)	Residual requirement	Notional approach to distributing residual need by type (sq.m)	Preferred Location
Manufacturing B2	47,550	-6,390 net + 91,200 First Proposals	c.-200,490 (undersupply)	40,000 (10 ha) reflecting limited positive balance	Cambridge commutable
Distribution B8	126,800			100,000 (25 ha)	SRN location / urban fringe for last mile
General Industrial B2/B8/E(g) incl. trade / wholesale	63,400			40,000 (10 ha)	Urban / urban fringe / access
Other uses	47,550				
Mid-tech B2/B8/E(g)	31,700	34,652 E(g)(iii)	+2,952 (marginal oversupply)	15,000* (5 ha)	Enhanced urban connectivity / urban fringe / science park proximity
Total	317,000	119,500	-197,538	197,000	

Source: Iceni Projects

There is clearly significant pent-up demand for warehouse space across the plan period, including across a range of different unit sizes. Whilst the large allocation on the A14 will deliver a large amount of this residual demand, this will likely be larger floor plates, and as identified above there is also demand for smaller scale units which can be accommodated on this Site.

Given the Site's sustainable location in close proximity to large housing proposals (Cambourne and Bourn Airfield), proximity to Cambridge urban fringe and its strong access to the strategic road network, it could function across the range of uses that may look to take up warehouse space as well as function for the current draft allocated uses.

Proposed Amendments to Policy S/RRA/SNR

As previously outlined, Paragon is supportive of the draft allocation for employment uses in principle on the Site and believe work to date clearly demonstrates it is available, achievable and deliverable. The Site can also be made available for residential uses should the Council wish to discuss this further, we would be happy to do so.

However, based upon the evolving commercial market and the special qualities of the Site, we believe that the allocated uses can be expanded to include B2 and B8. This would also be consistent with paragraph 86 e) of the examining Framework, and the clear direction of travel set out by the new Framework. As such, we do not believe the resistance to include B2 and B8 uses has been justified appropriately. We therefore object to the policy in this regard.

We have set out the proposed changes in bold below to address the use classes matter and to ensure sufficient flexibility should Cambourne to Cambridge ("C2C") or East West Rail not be delivered. It is acknowledged that C2C has been subject to a public inquiry, however flexibility needs to be retained in policy terms in case the scheme is not delivered.

Further, additional new wording has been added since Regulation 18 without justification regarding a requirement for 'forest scale' trees. It is for the development management process to determine an appropriate landscape design; this may include how a site best addresses biodiversity net gain for instance.

The proposed changes are below:

- *Site area of 4.6 hectares.*
- *Capacity for approximately 5,000 square metres of office (Class E(g)(i)), research and development (Class E(g)(ii)), ~~and~~ light industrial (Class E(g)(iii))* ***, industrial (B2) and storage and distribution (B8)****.*

1. *Development proposals must demonstrate how they will meet the following requirements:*

a) *Development proposals ~~must~~* ***should*** *enhance the existing southern hedgerow to provide visual screening ~~and include trees of forest scale and understorey planting~~. Landscape proposals must take into account landscape enhancements associated with the Cambourne to Cambridge high quality public transport (HQPT) corridor and East West Rail;*
b) *Implement measures necessary to provide good public transport and active travel access to the site from surrounding existing and planned developments;*
c) *The form and siting of the development will need to account for and safeguard land for the Cambourne to Cambridge high quality public transport (HQPT) corridor* ***unless it can be evidenced that the scheme will not come forward****;*
d) *Development of the site must not prejudice the preferred East-West Rail route alignment or its delivery* ***unless it can be evidenced that the scheme will not come forward****; and*
e) *Must be accompanied by an appropriate archaeological assessment, including the extent, character and condition of the archaeological resource and the likely impact of the development on the archaeological remains.*
f) Any forthcoming application should be accompanied by a Noise Impact Assessment.

I hope the above is clear. However, should you have any questions, or wish to discuss the points made in this representation, please do not hesitate to get in touch.

Kind regards,

[redacted]

Gareth Pritchard
Partner

Appendix 1: Noise Feasibility Study

Land North of St Neots Road, Hardwick

Noise Feasibility Study

23rd September 2026

Prepared for:	Paragon Land & Estates Limited c/o Bidwells LLP
Project Reference:	26148
Document Reference:	26148-HEY-XX-XX-T-Y-5001
Revision:	P01

Status / Revisions

Revision	Date	Status	Author	Reviewer
P01	23/09/2026	S2	Sam Laws BSc (Hons) MIOA	James Williams BSc (Hons) MIOA

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1. Introduction

Heyda Ltd has been commissioned by Paragon Land & Estates Limited (c/o Bidwells LLP) to undertake a noise feasibility study in relation to the potential commercial development of land to the north of St Neots Road, Hardwick.

The site is currently allocated for employment uses which are relatively limited in their potential noise generation. Greater flexibility is being considered for its future development, including the potential to accommodate Class B2 general industrial and Class B8 storage and distribution uses.

The purpose of this study is to establish whether these potentially more noise-generating uses could be accommodated without giving rise to unacceptable noise effects at existing noise-sensitive receptors. In particular, the assessment considers whether there is any fundamental acoustic reason for the site to be restricted to the currently allocated uses.

As a detailed masterplan and future occupier requirements have not yet been established, an indicative development scenario has been assessed comprising two commercial buildings with associated servicing areas, HGV circulation, car parking and building services plant. The arrangement provides a reasonable basis for testing the acoustic capacity of the site and does not represent a fixed development proposal.

The assessment:

- establishes the existing sound environment through environmental sound monitoring;
- establishes appropriate noise criteria for operational activity and fixed building services plant;
- assesses representative HGV movements, loading and unloading, car parking and noise breakout from activities within the proposed buildings;
- considers the influence of site layout, building orientation and acoustic screening; and
- identifies the acoustic parameters that should inform the future masterplan and operational proposals.

As the development remains at an early stage, the assessment is based on indicative development geometry and representative feasibility-stage operational assumptions. The findings should therefore be regarded as defining an acoustic development envelope rather than demonstrating compliance for a fixed development or particular future occupier.

The assumptions and design parameters should be reviewed and, where necessary, refined as the masterplan and operational requirements develop.

A glossary of the principal acoustic terminology used in this report is provided in Appendix A.

2. Policy, Standards and Guidance Documents

In preparing the noise feasibility assessment for the proposed commercial development at St Neots Road, Hardwick, the following policies, standards and guidance documents have been consulted. These documents have informed the scope and direction of the assessment.

- **National Planning Policy Framework (NPPF), 2026:** Sets the Government's planning policies for England and outlines expectations for their application, including the consideration of noise and the protection of health, quality of life and amenity. The current NPPF was published in August 2026.
- **Noise Policy Statement for England (NPSE), 2010:** Articulates the long-term vision for noise management, providing guiding principles to avoid significant adverse impacts and to minimise adverse effects on health and quality of life.
- **Planning Practice Guidance – Noise (PPG-N), 2019:** Provides guidance on the consideration of noise within the planning process, including the need to identify potential adverse effects and to consider good acoustic design at an early stage.
- **South Cambridgeshire Local Plan, 2018 – Policy SC/10: Noise Pollution:** Seeks to ensure that development does not result in unacceptable adverse impacts on the acoustic environment and, specifically in relation to commercial and industrial development, that noise does not cause a significant increase in background sound levels at nearby existing noise-sensitive premises.
- **Proposed Submission Greater Cambridge Local Plan, 2026 – Policy S/RRA/SNR: Land to the North of St Neots Road:** The emerging Local Plan identifies the site for employment development comprising Class E(g)(i) office, Class E(g)(ii) research and development and Class E(g)(iii) light industrial uses. The policy therefore provides the current planning context for the site.
- **BS 4142:2014+A1:2019 – Methods for Rating and Assessing Industrial and Commercial Sound:** Describes the methodology for assessing the impact of industrial and commercial sound sources, including fixed plant, loading/unloading operations and other associated activities, at existing noise-sensitive receptors through comparison of the rating level with the background sound level.
- **BS 7445-1:2003 – Description and Measurement of Environmental Noise – Part 1: Guide to Quantities and Procedures:** Provides guidance on environmental noise measurement quantities and procedures and has informed the survey methodology adopted for this assessment.
- **ISO 9613-2:2024 – Acoustics: Attenuation of Sound During Propagation Outdoors – Part 2: Engineering Method for the Prediction of Sound Pressure Levels Outdoors:** Defines the standard approach for predicting the propagation of sound over distance in outdoor environments, accounting for factors including ground absorption, barriers, atmospheric attenuation and reflections, and forms the basis of the modelling methodology used in Cadna/A.

3. Site Description & Indicative Development Parameters

3.1. Site Description

The proposed development site is located to the north of St Neots Road, Hardwick, and comprises a long, relatively narrow parcel of predominantly open land situated between the A428 and the existing settlement.

The immediate surroundings of the site are as follows:

- **North:** The A428 dual carriageway, which runs immediately beyond the northern edge of the site, with predominantly agricultural land beyond;
- **East:** Existing residential development forming the northern edge of Hardwick, with the nearest dwellings located close to the eastern end of the site;
- **South:** St Neots Road, with existing residential properties beyond. These are generally set back from the road frontage, typically by several tens of metres, with areas of open land also present along parts of the southern boundary; and
- **West:** Existing residential properties close to the western boundary of the site, together with areas of open land and existing commercial uses, including a petrol filling station towards the western end of St Neots Road.

The nearest noise-sensitive receptors to the proposed development include:

- **NSR 1:** Existing residential dwellings located close to the western boundary of the site; and
- **NSR 2:** Existing residential dwellings to the south of St Neots Road.

Figure 1 shows the approximate site boundary, surrounding land uses and identified noise-sensitive receptors.

Figure 1: Approximate Site Boundary (red line)



3.2. Indicative Development Parameters

At the time of preparing this feasibility study, the detailed form, layout and occupation of the proposed development had not been established.

For assessment purposes, an indicative arrangement has therefore been assumed comprising two commercial buildings positioned towards the eastern and western ends of the site. The principal servicing elevations face inwards, with associated loading areas, HGV circulation and staff/visitor parking located principally within the central part of the site. Vehicular access is assumed from St Neots Road.

The arrangement also allows for fixed building services plant, landscaping and boundary treatment.

The indicative development is intended to test the potential for Class B2 general industrial and Class B8 storage and distribution uses. No particular occupier, operational process or detailed vehicle schedule has been assumed.

The detailed geometry and operational assumptions used within the acoustic model are described in Section 6.2.

4. Baseline Sound Conditions

4.1. Sound Survey Overview

The prevailing sound conditions in the area have been determined by an environmental sound survey.

Sound measurements were undertaken between 14th and 15th September 2026 at two part-attended and part-unattended noise monitoring positions.

The results of the survey have been used to establish the existing ambient and background sound levels at locations considered representative of the nearest noise-sensitive receptors to the proposed development.

Given the potential for the future development to accommodate industrial and distribution uses, the survey has been undertaken over a sufficiently long period to identify representative sound levels during both daytime and night-time periods.

4.2. Survey Methodology

All measurements were undertaken by a consultant experienced in environmental noise monitoring and using suitable measurement instrumentation, with the survey procedure following the principles of BS 7445. The monitoring locations were chosen following a full site walkover and were considered representative of the prevailing environmental noise levels affecting the identified noise-sensitive receptors. The recorded parameters included:

- **dB $L_{Aeq,T}$**: The A-weighted equivalent continuous sound pressure level over the measurement period, T. This parameter represents the average sound level during the period.
- **dB $L_{Amax,T}$**: The A-weighted maximum sound pressure level during the measurement period, T, indicating the maximum noise level of short-term noise events.
- **dB $L_{A90,T}$**: The A-weighted sound pressure level exceeded for 90% of the measurement period, T, often referred to as the "background sound level".

The measurement positions are detailed in Table 1 and illustrated in Figure 2.

Table 1: Noise Measurement Positions

Position Ref	Position Description	Measurement Conditions
MP1	Part-attended, part-unattended sound measurement position along the site's southern boundary, towards the eastern end of the site, facing St Neots Road. Microphone was 2.2m above local ground level.	Free-field
MP2	Part-attended, part-unattended sound measurement position along the site's southern boundary, towards the western end of the site, in proximity to the existing residential properties. Microphone was 2m above local ground level.	Free-field

Figure 2: Noise Measurement Positions



4.3. Measurement Equipment

All acoustic measurement equipment used during the survey conformed to the requirements of BS EN 61672 for Class 1 sound level measurement instrumentation. A full inventory of this equipment is shown in Table 2.

Table 2: Sound Measurement Equipment

Item	Manufacturer/Model Type	Serial Number
Sound Level Meter	NTi Audio XL3	A3A-01719-F0
Preamplifier	NTi Audio MA230	2182
Microphone	NTi Audio MC230A	A32197
Sound Level Meter	NTi Audio XL3	A3A-01788-F0
Preamplifier	NTi Audio MA230	2197
Microphone	NTi Audio MC230A	A32226
Calibrator	Norsonic 1251	30754

The meters had been calibrated by a UKAS accredited laboratory within the previous 24 months. The calibration level was also checked at the start and end of the survey using a field calibrator.

No significant drift in the calibration was measured over the course of the survey (≤0.2 dB). The calibrator used had itself been calibrated by a UKAS accredited calibration laboratory in accordance with IEC 60942:2017 within the twelve months preceding the measurements.

The microphones were each fitted with protective windshields for the measurements.

4.4. Observations

At MP1, the dominant source of noise was road traffic. This was principally associated with vehicles travelling along St Neots Road, which was observed to carry relatively frequent local traffic, together with more continuous traffic noise from the A428 to the north.

The A428 was particularly influential on the underlying sound climate, while individual vehicle movements along St Neots Road were more apparent as short-duration local events. No other significant or persistent noise sources were identified during the attended survey periods.

At MP2, the sound environment was similarly dominated by road traffic from St Neots Road and the A428. Noise associated with the nearby petrol filling station was also audible at this position, although road traffic remained the principal influence on the overall sound climate.

The monitoring positions were considered representative of the prevailing noise climate affecting the eastern and western parts of the site and the nearest surrounding residential receptors.

4.5. Weather Conditions

The weather conditions during the survey were observed and noted as being generally suitable for environmental sound measurement. Attended observations have been

supplemented with historical meteorological data obtained from the Met Office Cambridge NIAB weather station.

Conditions during the evening and overnight period of 14th September 2026 were generally dry, with relatively light winds. During the morning of 15th September 2026, a weakening band of rain passed through the area, giving some short periods of light rain or showers, with wind speeds also increasing during the latter part of the survey period. Conditions subsequently became drier and brighter.

The short periods of light rainfall were not considered sufficient to materially affect the overall survey dataset. Where necessary, the measured data have been reviewed alongside the prevailing weather conditions when determining representative sound levels for use within the assessment.

4.6. Measurement Results

A summary of the measured sound levels at the measurement positions is presented in Table 3.

Table 3: Summary of Measured Sound Levels

Position	Period (T)	Equivalent continuous SPL $L_{Aeq,T}$ (dB)	Typical maximum sound pressure level L_{AFmax} (dB)	Typical background sound pressure level $L_{A90,1hour/15mins}$ (dB)
MP1	Daytime (07:00 – 23:00)	70	91	57
	Night-time (23:00 – 07:00)	60	85	39
MP2	Daytime (07:00 – 23:00)	65	90	54
	Night-time (23:00 – 07:00)	54	75	41

In accordance with the principles of BS 4142:2014+A1:2019, the representative background sound levels adopted for the assessment have been derived following a statistical review of the measured $L_{A90,T}$ data over the relevant assessment periods.

The statistical analysis has been considered alongside the measured time histories, site observations and the range and distribution of measured background sound levels, rather than relying solely upon an arithmetic average or minimum measured value.

A full time-history graph and statistical analyses graphs for the daytime and night-time background noise levels are included in Appendix B.

5. Assessment Criteria

The assessment criteria have been developed using the measured background sound levels and the principles of BS 4142:2014+A1:2019.

Two separate noise allowances have been adopted:

- an overall limit for operational activity, including HGV movements, loading and unloading, car parking and noise breakout from activities within the buildings; and
- a lower limit for fixed building services plant.

This approach retains most of the available acoustic capacity for operational activities, which are generally more variable and less readily controlled than fixed plant.

5.1. Overall Noise Emission Criteria

South Cambridgeshire Local Plan Policy SC/10 seeks to avoid unacceptable noise effects and significant increases in background sound levels at nearby noise-sensitive premises.

BS 4142 assesses industrial and commercial sound by comparing the rating level from the development with the existing background sound level. The resulting difference provides an indication of likely impact, taking account of the context in which the sound occurs.

For this feasibility study, a design target has been adopted whereby the cumulative rating level from operational activity does not exceed 5 dB below the representative background sound level.

The lowest representative background sound levels measured across the site were 54 dB $L_{A90,T}$ during the daytime and 39 dB $L_{A90,T}$ during the night-time. The resulting operational criteria are summarised in Table 4.

Table 4: Overall Cumulative Noise Emission Criteria

Period	Lowest Representative Background Sound Level, $L_{A90,T}$, dB	Maximum Cumulative Rating Level, $L_{Ar,Tr}$
Daytime (07:00–23:00)	54	49
Night-time (23:00–07:00)	39	34

These criteria apply to the combined contribution from operational activities across the development. Where relevant, corrections for characteristics such as tonality, impulsivity or intermittency are included in accordance with BS 4142.

A more stringent allowance has been adopted for fixed building services plant, equivalent to 15 dB below the representative background sound level. This gives maximum cumulative plant rating levels of:

- 39 dB $L_{Ar,Tr}$ during the daytime; and
- 24 dB $L_{Ar,Tr}$ during the night-time.

The plant allowance is deliberately set below the operational criterion so that fixed plant would not materially reduce the acoustic capacity available for other activities.

The criteria are based on the lowest representative background sound levels measured across the two monitoring locations and have therefore been applied across the site for this feasibility assessment.

5.2. Application to Operational Activity

The operational criteria apply to the combined noise from HGV movements, loading and unloading, car parking and vehicle activity, and noise breakout from activities within the proposed buildings.

These sources are modelled separately so that their relative contribution can be understood, but they are assessed cumulatively against the limits in Table 4.

Both daytime and night-time operation have been considered to establish the potential acoustic capacity of the site. The assumptions used for each activity and the resulting assessment are set out in Section 6.

6. Noise Impact Assessment – Operational Activity

An acoustic model has been developed to test the level of B2/B8 operational activity that could be accommodated within the indicative development while meeting the criteria established in Section 5.

The assessment considers:

- HGV movements and manoeuvring;
- loading and unloading;
- staff and visitor car parking; and
- noise breakout from activities within the proposed buildings.

The assumptions adopted for each source are described below, followed by the predicted cumulative noise levels at the nearest noise-sensitive receptors.

Fixed building services plant is not included within this assessment, as it is subject to the separate plant noise allowance established in Section 5.

6.1. Assessment Methodology

Operational noise levels have been predicted using Cadna/A environmental noise modelling software in accordance with ISO 9613-2:2024.

The model includes the indicative development layout, surrounding buildings and relevant screening features. Predictions account for distance attenuation, atmospheric absorption, ground effects, screening and reflections.

Operational activities have been represented using point, line, area and building-envelope sources as appropriate. Source noise data have been derived from published information and Heyda Ltd measurement data for comparable industrial and logistics activities.

The assessment follows the principles of BS 4142:2014+A1:2019. Predicted specific sound levels from the individual sources are combined at the noise-sensitive receptors and, where appropriate, corrections are applied for distinctive acoustic characteristics.

The BS 4142 reference periods adopted are:

- one hour during the daytime; and
- 15 minutes during the night-time.

The model has been used to test whether the representative operational assumptions described below could be accommodated within the noise limits established in Section 5.

6.2. Assessment Assumptions

6.2.1. Overview

As the final occupier and operational requirements are not yet known, representative assumptions have been adopted for the principal activities likely to be associated with B2 and B8 uses.

These assumptions are intended to test a credible operating scenario rather than define a fixed future operation. The assessment considers:

- HGV activity;
- loading and unloading;
- staff and visitor vehicle movements;
- internal operational noise;
- building-envelope sound insulation; and
- acoustic screening.

The assumptions adopted for each are set out in the following sections.

6.2.2. Indicative Site Layout and Model Geometry

As no detailed masterplan has been developed, an indicative site arrangement has been prepared solely for the purposes of this acoustic feasibility assessment. The arrangement is intended to provide a credible B2/B8 development scenario against which the acoustic constraints of the site can be tested.

The assumed arrangement is illustrated in Figure 3.

Figure 3: Indicative Site Layout Developed for Acoustic Feasibility Assessment



The site is approximately 500m long and 72m wide. The indicative layout comprises two commercial buildings positioned towards the western and eastern ends of the site, with a central area used for vehicle circulation and staff/visitor parking.

Each building has been assumed to have an approximate footprint of 100m × 65m and a height of 10m.

The principal loading and servicing elevations are assumed to face inward towards the centre of the site, with dedicated loading and manoeuvring areas immediately outside each building.

A principal vehicular access is assumed from St Neots Road, broadly central to the site. HGVs enter via the central access before travelling north and then east or west towards the respective service yards. Staff and visitor parking is located within the central part of the site.

The model therefore assumes:

- two commercial buildings, each approximately 100m × 65m × 10m;
- inward-facing servicing elevations;
- dedicated loading, unloading and HGV manoeuvring areas;
- a central site access from St Neots Road;
- internal HGV circulation routes serving the eastern and western yards;
- approximately 90 staff and visitor parking spaces; and
- non-operational buffer areas around the outer parts of the site where practicable.

The inward-facing servicing arrangement and positioning of the principal HGV circulation route away from the southern site boundary have been adopted as reasonable acoustic assumptions for the feasibility assessment.

The layout is indicative only. The findings are intended to inform the future masterplan, particularly in relation to building orientation, servicing arrangements, vehicle circulation and separation from nearby noise-sensitive receptors.

6.2.3. Warehouse/Process Noise

B2 and B8 uses may generate relatively high internal noise levels, which could radiate through the external building envelope.

For the feasibility assessment, a continuous internal reverberant sound pressure level of 85 dBA has been assumed within each building. This is intended to represent a relatively high-noise internal environment and provides a precautionary basis for assessing building-envelope breakout.

The assumed octave-band spectrum is presented in Table 5.

Table 5: Assumed Internal Activity Noise

Source	Data Type	Reverberant Sound Pressure Level (dB) at Octave Band Centre Frequency, Hz								dBA
		63	125	250	500	1k	2k	4k	8k	
Internal Processes	L_{Prev}	85	86	84	82	80	77	74	70	85

Noise breakout has been modelled through the external walls and roof using the sound reduction performance presented in Table 6.

Table 6: Assumed Building Envelope Sound Reduction Performances

Element	Sound Reduction Index, R (dB) at Octave Band Centre Frequency, Hz								$R_w + C_{tr}$
	63	125	250	500	1k	2k	4k	8k	
Façade/Roof	23	28	33	40	45	37	42	42	37

The assumed envelope performance represents a reasonable industrial building construction for feasibility purposes and is not intended as a final specification.

The modelled extent of the internal warehouse/process noise sources is illustrated in Figure 4.

Figure 4: Modelled Warehouse / Process Noise Sources (red line)



The adopted internal noise level and envelope performance should be reviewed once the future occupier, operational processes and building construction are known.

6.2.4. Car Park Noise

The indicative layout includes approximately 90 staff and visitor parking spaces, divided broadly equally between two parking areas.

For the daytime assessment, a complete turnover of the car park within one hour has been assumed. Across the development, this represents approximately:

- 90 vehicle arrivals;
- 90 vehicle departures; and
- 180 door-slam events.

A lower activity rate, equivalent to 25% of the daytime peak, has been assumed during the night. This corresponds to approximately 3 arrivals, 3 departures and 6 door-slam events at each car park during the 15-minute night-time assessment period.

Representative source data for vehicle manoeuvring, departure and door-slam events are summarised in Table 7.

Table 7: Assumed Source Data – Car Parking Noise Levels

Source	Activity Description	Distance (m)	SEL (dBA)	Notes
Arrival / manoeuvring	Pass-by, turning, reversing	10	67	Cars looking for spaces
Departure	Ignition, exit manoeuvre and acceleration	10	62	Typical departure
Door slams	Opening or closing of doors	10	65	Typical modern car doors

The event data have been combined according to the assumed activity rates and converted to spectral sound power levels for use within the acoustic model.

The resulting source data applied to each car park are presented in Table 8.

Table 8: Car Parking Spectral Source Data

Assessment Period	Data Type	Sound Power Level (dB) at Octave Band Centre Frequency, Hz								dBA
		63	125	250	500	1k	2k	4k	8k	
Daytime	Area L_w	87	80	75	75	74	74	70	66	80
Night-time	Area L_w	81	74	69	69	68	68	64	60	74

The two car parking areas have been represented as separate area sources, as illustrated in Figure 5.

Figure 5: Modelled Car Park Sources (red hatch)



6.2.5. HGV Movements and Manoeuvring

HGV movements have been modelled along the indicative circulation routes described in Section 6.2.2, with separate routes serving the eastern and western buildings.

The assessment includes HGV arrival, low-speed circulation and manoeuvring within the site, followed by departure. Loading and unloading noise is considered separately in Section 6.2.6.

Representative source data from Heyda Ltd measurements of comparable commercial and logistics activities are summarised in Table 9.

Table 9: Reference HGV Movement Source Data

Activity	Description	Reference Distance	Measured Level, $L_{Aeq,T}$, dB	SEL, dB
Arrival / manoeuvring	Low-speed approach, turning and reversing	10m	72	92
Departure	Exit manoeuvre and acceleration	10m	72	88

For the assessment, one HGV delivery comprises one arrival/manoeuvring event and one departure.

The following activity rates have been assumed for each building:

- **Daytime:** six HGV deliveries per hour; and
- **Night-time:** one HGV delivery within the 15-minute assessment period.

This is equivalent to twelve deliveries per hour across the site during the daytime and two deliveries within a 15-minute period during the night.

The reference event data have been converted to equivalent spectral line-source sound power levels for use within the acoustic model, as presented in Table 10.

Table 10: HGV Movement Spectral Source Data

Assessment Period	Line Source Sound Power Level (dB) at Octave Band Centre Frequency (Hz)								dBA
	63	125	250	500	1k	2k	4k	8k	
Daytime	88	80	74	74	75	72	68	62	79
Night-time	86	78	72	72	73	70	66	60	77

The adopted activity rates are feasibility assumptions rather than fixed operational limits or traffic forecasts and should be reviewed as the future occupier and servicing requirements become established.

6.2.6. Loading and Unloading Activity

Loading and unloading noise has been assessed separately from HGV movements and includes activities such as pallet transfer, tail-lift operation and loading-bay door impacts.

Representative source data from Heyda Ltd measurements of comparable commercial and logistics activities are summarised in Table 11.

Table 11: Reference Loading and Unloading Source Data

Activity	Description	Duration	Reference Distance, m	$L_{Aeq,T}$, dB	SEL, dB
Loading / unloading	Pallet transfer, tail-lift operation, door impacts and light handling impacts	15 min	25	59	89

For the daytime assessment, one loading/unloading operation has been assumed to be continuously active at each building throughout the one-hour assessment period.

For the night-time assessment, one complete 15-minute loading/unloading event has been assumed at each building within the 15-minute assessment period.

The same source level therefore applies to both assessment periods, as presented in Table 12.

Table 12: Loading and Unloading Spectral Source Data

Assessment Period	Activity Assumption (per building)	Sound Power Level (dB) at Octave Band Centre Frequency, Hz								dBA
		63	125	250	500	1k	2k	4k	8k	
Daytime	Continuous loading activity	82	86	89	91	90	88	84	80	95
Night-time	1 × 15-minute loading event/15 min	82	86	89	91	90	88	84	80	95

Each loading/unloading source has been modelled as a localised area approximately 24m × 10m in extent, positioned immediately adjacent to the servicing elevation of each building.

The assessment assumes one active loading/unloading operation at each building at any one time. HGV engines are assumed to be switched off during substantive loading and unloading, with vehicle movements and manoeuvring considered separately in Section 6.2.5.

6.2.7. Boundary Screening

A 2.7m high solid acoustic barrier has been included within the model along the assumed southern site boundary, to either side of the principal access from St Neots Road, as illustrated in Figure 6.

Figure 6: Assumed Boundary Screen Extents (red line)



The barrier has been positioned to screen the principal external operational areas, including staff and visitor parking, HGV circulation and manoeuvring, and loading and unloading activity.

The central site access remains open, with the proposed buildings and barrier sections together providing screening along much of the southern side of the operational areas.

For the predicted acoustic benefit to be achieved, the barrier would need to be continuous and imperforate, with no significant gaps at ground level or between panels.

The 2.7m height and extent adopted within the model represent an indicative feasibility measure rather than a final boundary specification. The final arrangement should be reviewed as the masterplan, access layout, finished ground levels and operational requirements develop.

6.3. Noise Impact Assessment

6.3.1. Overview

The modelled operational sources have been combined to determine the cumulative noise level at the nearest noise-sensitive receptors for the daytime and night-time scenarios described above.

The assessment assumes that the principal operational sources occur concurrently within the relevant BS 4142 reference period.

6.3.2. Specific Level Results

The predicted specific sound levels are summarised in Table 13.

Table 13: Predicted Worst Case Specific Noise Levels at NSRs

Source	Predicted Worst-Case Daytime (07:00–23:00) Specific Sound Level, $L_{Aeq,Tr}$ (dB), T_r = 1 hour	Predicted Night-Time (23:00–07:00) Specific Sound Level, $L_{Aeq,Tr}$ (dB), T_r = 15 minutes
Warehouse Breakout	27	27
Loading/Unloading	43	43
HGV Movements	29	27
Car Park Activity	30	24
Total: All Sources Combined	43	43

The results show that loading and unloading activity is the dominant operational noise source in both the daytime and night-time scenarios. Contributions from HGV movements, car park activity and warehouse breakout are substantially lower.

6.3.3. Feature Correction Applicability

Loading and unloading is the dominant operational noise source and may contain intermittent and impulsive characteristics.

For the feasibility assessment, an overall BS 4142 acoustic feature correction of +6 dB has therefore been applied to the cumulative specific sound level.

No additional correction for tonality or other distinctive characteristics has been assumed at this stage. The adopted correction should be reviewed once the future occupier and detailed operational activities are known.

6.3.4. BS 4142 Impact Assessment

The resulting BS 4142 assessment is presented in Table 14.

Table 14: Predicted Specific and Rating Levels for Typical Operational Activity

Location	Period	Typical Background Sound Level, $L_{A90,T}$, dB	Limiting Rating Level Criteria for Operations $L_{Ar,Tr}$ (dB)	Predicted Specific Sound Level dB $L_{Aeq,Tr}$	Predicted Rating Level dB $L_{Ar,Tr}$	Rating against Typical Background Sound Level (dB)	Rating against Limiting Criteria (dB)
Worst-Affected Assessed NSR	Daytime (07:00 – 23:00)	54	49	43	49	-5	0
	Night-time (23:00 – 07:00)	39	34	43	49	+10	+15

During the daytime, the predicted rating level is 49 dB $L_{Ar,Tr}$, which meets the adopted operational criterion and is approximately 5 dB below the representative background sound level.

The daytime result is principally controlled by loading and unloading activity. The assessed daytime scenario is therefore dependent on the servicing assumptions described in Section 6.2.6.

The daytime assessment therefore indicates that B2/B8-type operation could be accommodated within the indicative development arrangement without exceeding the adopted operational noise criterion, subject to the assumed servicing intensity, layout and screening.

During the night-time, the same external loading and unloading activity results in a predicted rating level of 49 dB $L_{Ar,Tr}$. This is approximately 15 dB above the adopted night-time criterion.

Routine external loading and unloading at the assessed intensity is therefore unlikely to be acoustically feasible during the night-time period. This does not preclude night-time operation more generally, but indicates that external servicing would need to be reduced, enclosed or otherwise controlled. A reduced night-time operational scenario is considered in Section 6.3.5.

6.3.5. Refined Night-Time Operational Scenario

As external loading and unloading is the principal constraint on night-time operation, a reduced night-time scenario has also been assessed.

The previously assumed HGV movements, car park activity and internal operational noise have been retained, but substantive loading and unloading has been removed from the external service yards.

Where night-time loading or unloading is required, it has instead been assumed to take place within the buildings. The previously adopted internal noise level of 85 dBA has been retained, with doors and other significant openings assumed to be suitably managed to avoid uncontrolled noise breakout.

With external loading removed, the remaining operational noise is principally associated with HGV movements, car park activity and warehouse/process breakout. A reduced BS 4142 acoustic feature correction of +3 dB has therefore been applied to account for the intermittent character of vehicle movements.

The resulting assessment is presented in Table 15.

Table 15: Reduced Night-Time Operational Noise Assessment

Location	Period	Typical Background Sound Level, $L_{A90,T}$, dB	Limiting Rating Level Criteria for Operations $L_{Ar,T}$ (dB)	Predicted Specific Sound Level dB $L_{As,T}$	Predicted Rating Level dB $L_{Ar,T}$	Rating against Typical Background Sound Level (dB)	Rating against Limiting Criteria (dB)
Worst Affected NSR	Night-time (23:00 – 07:00)	39	34	29	32	-7	-2

The assessment therefore indicates that night-time operation could potentially be accommodated at the levels assessed, provided that substantive loading and unloading is not undertaken externally. Where night-time loading is required, it would need to be suitably enclosed or otherwise controlled to provide an equivalent degree of acoustic protection.

Taken together with the daytime assessment, the results indicate that there is no fundamental acoustic constraint preventing the site from accommodating B2/B8-type uses. The principal constraint is the control of servicing activity, particularly during the night-time period.

6.3.6. Uncertainty

As with any environmental noise assessment, the results are subject to uncertainty arising from the measured baseline data, source noise information, calculation methods, acoustic modelling and the assumptions made regarding the future development.

The baseline sound environment has been established from measurements at two locations considered representative of the nearest noise-sensitive receptors. The measured data have been reviewed alongside the observed sound climate, weather conditions and statistical distribution of background sound levels. The lowest representative daytime and night-time background sound levels have then been applied across the site, providing a precautionary basis for the assessment. Some uncertainty nevertheless remains due to normal temporal variation in environmental sound conditions.

The operational source levels have been derived from published information and Heyda Ltd measurements of comparable activities. Event-based measurements have been converted to equivalent source levels for the relevant assessment periods and, where necessary, to sound power levels for use within the model. Actual noise emissions will vary according to factors such as vehicle type, equipment, operating technique, duration and intensity of activity.

Predicted sound levels have been calculated using Cadna/A in accordance with ISO 9613-2:2024. The model accounts for the principal propagation effects, including distance attenuation, atmospheric absorption, ground effects, screening and reflections. As with any predictive model, uncertainty remains in relation to the representation of source locations, ground conditions, screening geometry, building form and other site features, particularly as the final development layout has not yet been established.

Further uncertainty arises from the future operation of the site. The assessment is based on the representative activity rates, internal noise levels, building-envelope performance and screening arrangements described in Section 6.2. These assumptions provide a reasonable basis for testing feasibility but are not intended to predict the precise operation of a particular future occupier.

There is also uncertainty in the application of acoustic feature corrections under BS 4142, as the detailed character of future operational noise is not yet known. The corrections adopted in this assessment are based on the anticipated characteristics of the assumed activities and should be reviewed once the proposed occupier, plant and operating practices are better defined.

The results should therefore be regarded as defining a feasibility-stage acoustic development envelope rather than predicting the precise noise emissions or impacts of a future occupier. The assessment demonstrates that B2/B8-type development could potentially be accommodated within this envelope, subject to the assumptions and controls identified above. These assumptions, source data and design parameters should be reviewed and, where necessary, refined as the masterplan and operational requirements develop.

7. Conclusion

Heyda Ltd has undertaken a noise feasibility study to establish whether the site could, from an acoustic perspective, accommodate a broader range of commercial uses than those currently allocated, including B2 general industrial and B8 storage and distribution activities.

Environmental sound monitoring identified representative background sound levels of 54 dB $L_{A90,T}$ during the daytime and 39 dB $L_{A90,T}$ during the night-time. Based on these levels and the principles of BS 4142, maximum operational rating levels of 49 dB $L_{Ar,Tr}$ during the daytime and 34 dB $L_{Ar,Tr}$ during the night-time have been adopted.

An indicative B2/B8 development has been assessed, including HGV movements, loading and unloading, car parking and noise breakout from activities within the proposed buildings. The model also includes inward-facing servicing areas and a 2.7 m high acoustic barrier along the southern side of the principal operational areas.

During the daytime, the assessed operation is expected to be capable of achieving the adopted noise criterion. Loading and unloading is the dominant noise source and the result is therefore dependent on the servicing arrangements and activity levels assumed within the assessment.

The same level of external loading and unloading would not be suitable during the night-time period. However, a reduced night-time scenario, retaining HGV movements, car parking and internal activity but excluding substantive external loading and unloading, is expected to be capable of achieving the adopted night-time criterion. Where loading or unloading is required at night, it would need to take place within a suitably enclosed part of the building, or be subject to measures providing an equivalent degree of noise control.

The assessment has therefore not identified a fundamental acoustic reason why the site would need to be restricted to lower-noise employment uses. B2 and B8 uses could potentially be accommodated, subject to the future masterplan and operational proposals reflecting the acoustic principles identified in this report, particularly in relation to servicing locations, screening, building-envelope performance, fixed plant and night-time activity.

The assessment is based on an indicative layout and representative operational assumptions rather than a fixed development or occupier. The findings should therefore be regarded as defining a feasibility-stage acoustic development envelope. The assumptions and design parameters should be reviewed and refined as the masterplan, occupier requirements and detailed operational proposals develop.

Appendix A - Glossary of Acoustic Terminology

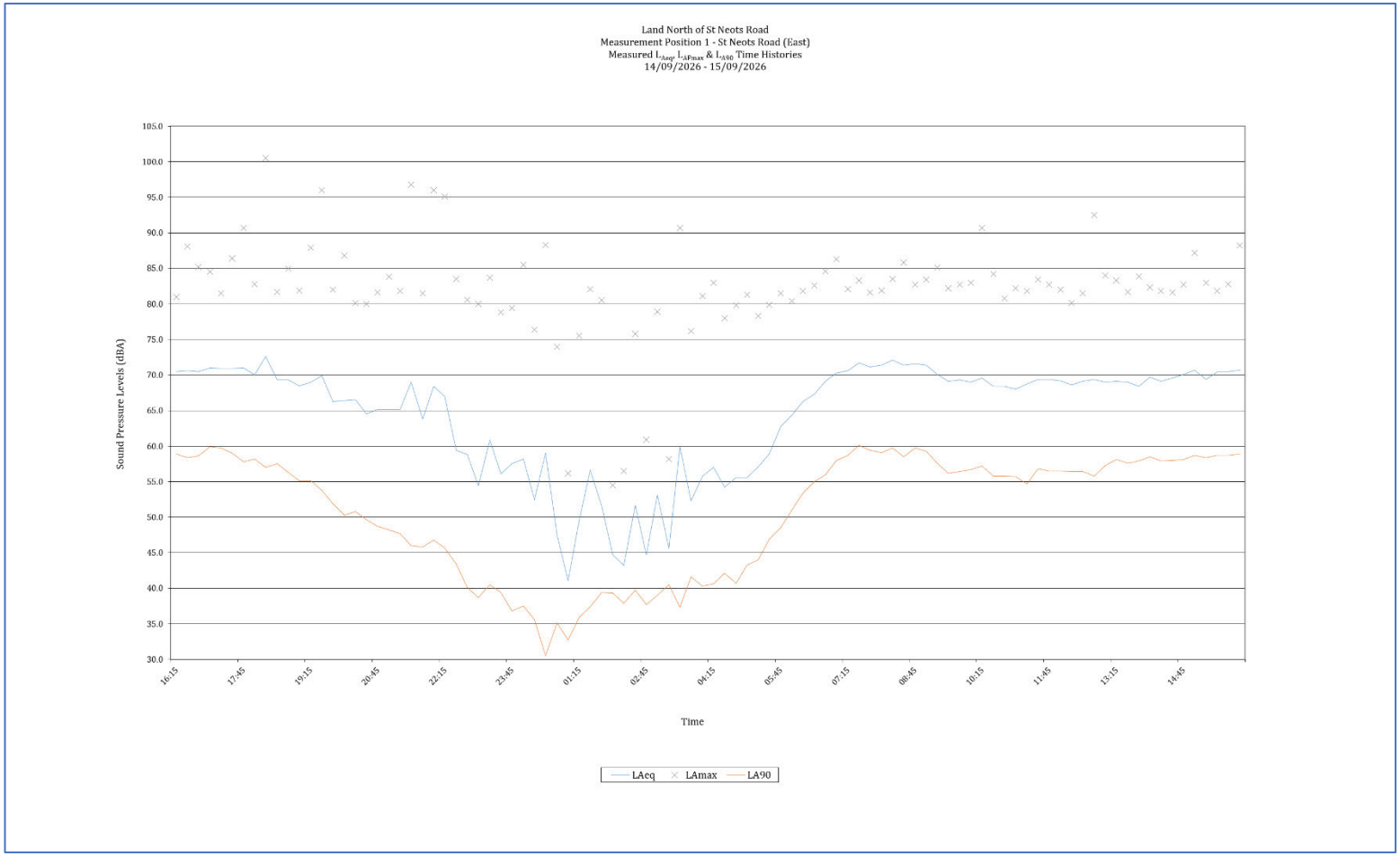
The following definitions are provided to assist with interpretation of the acoustic terminology used within this report.

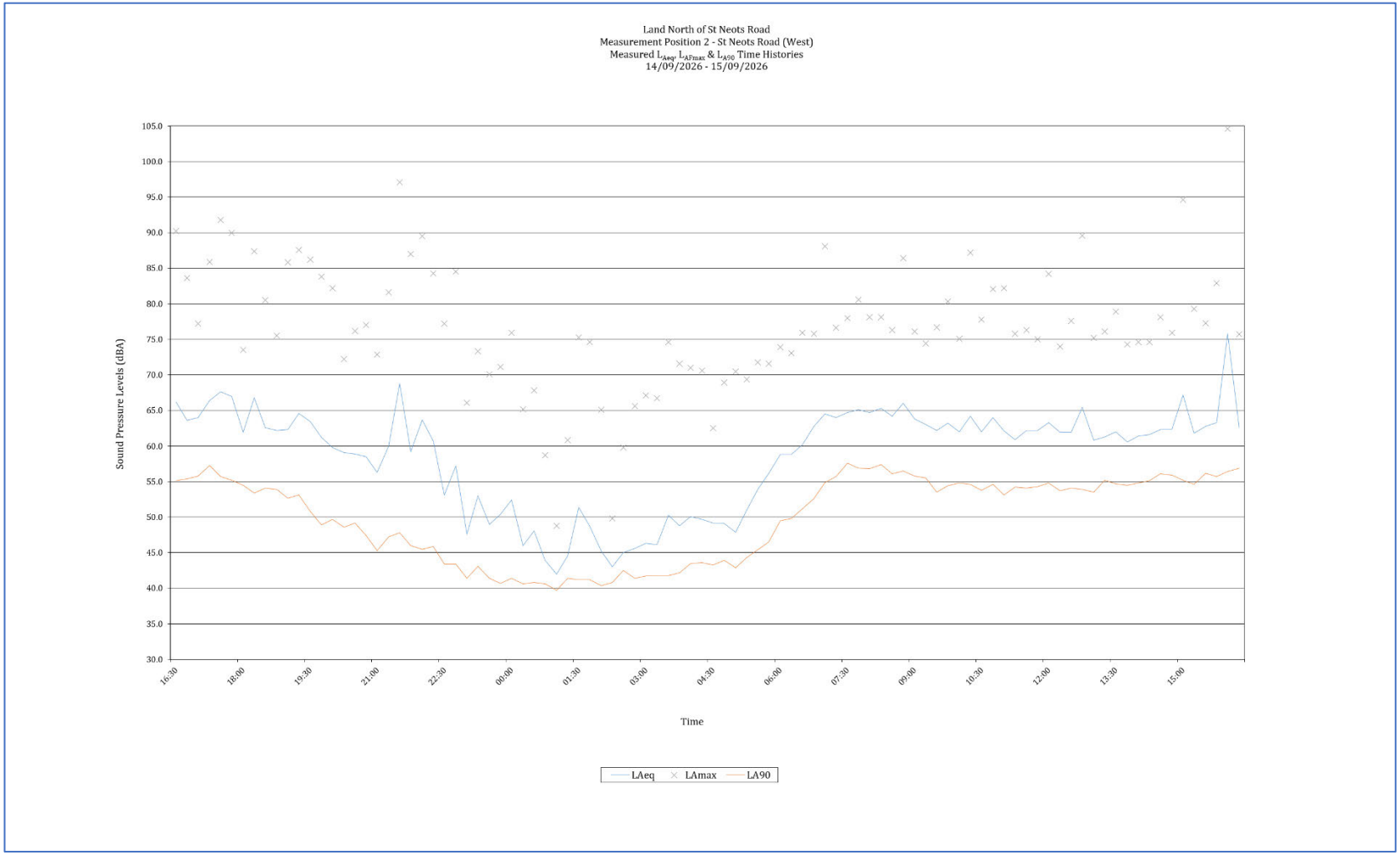
Table A1: Definitions of Acoustic Terminology and Parameters

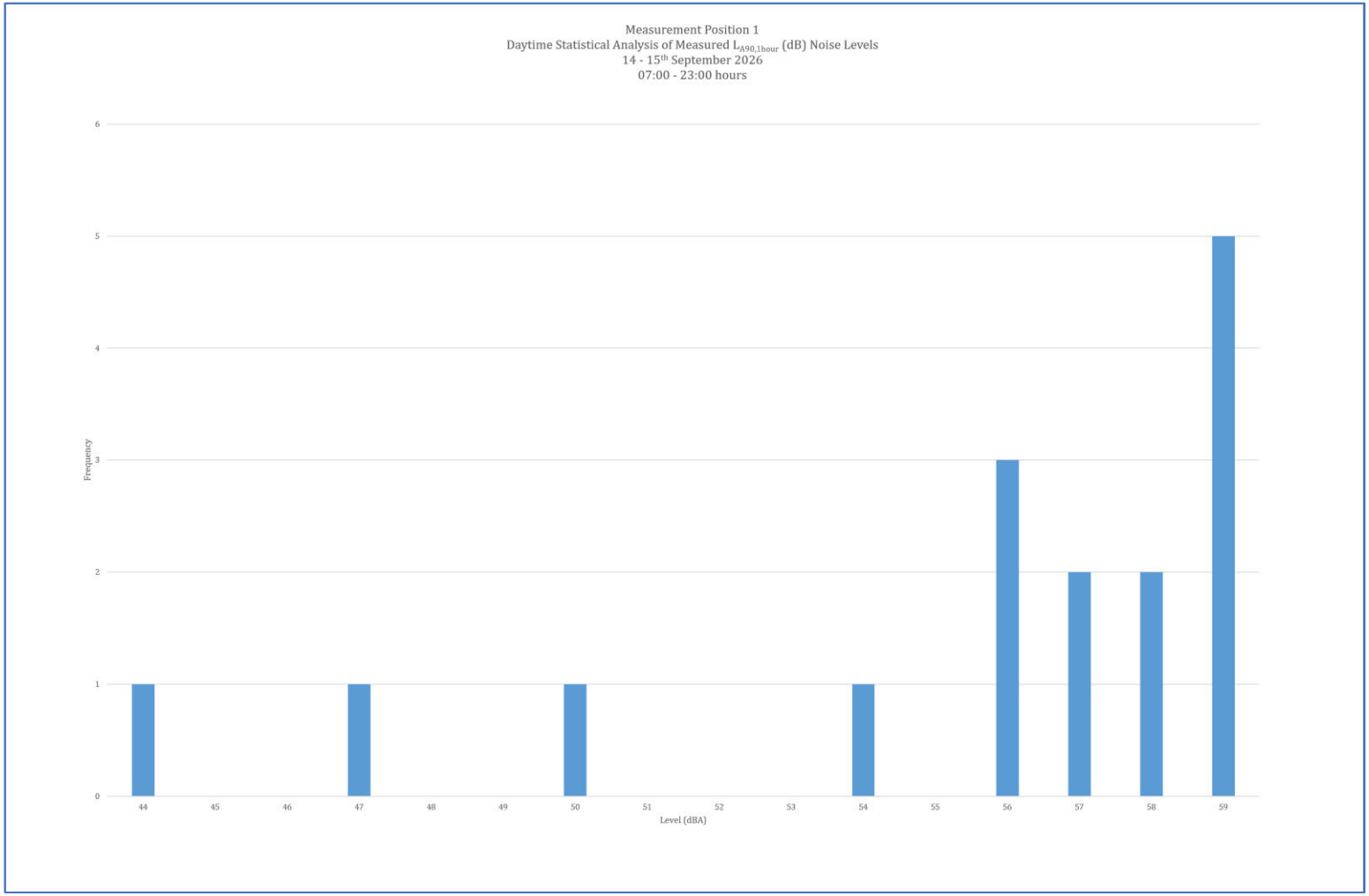
Wording	Description
Acoustic feature correction	An adjustment applied under BS 4142 where the specific sound has identifiable characteristics, such as tonality, impulsivity or intermittency, which may increase its prominence.
A-weighting	A frequency weighting applied to sound levels to account approximately for the frequency-dependent sensitivity of human hearing. A-weighted levels are commonly identified by the letter 'A', for example $L_{Aeq,T}$.
Ambient sound level	The total sound level at a location from all sound sources present. It is commonly expressed as $L_{Aeq,T}$.
Background sound level, $L_{A90,T}$	The A-weighted sound pressure level exceeded for 90% of a specified measurement period, T. It is commonly used to describe the underlying sound environment.
BS 4142	British Standard used to assess sound from industrial and commercial sources by comparing the rating level of the specific sound with the representative background sound level, taking account of the context in which the sound occurs.
Building envelope	The external construction of a building, including walls, roof, doors and other openings, through which internal noise may be transmitted to the outside.
Decibel, dB	A logarithmic unit used to express sound levels.
Equivalent continuous sound level, $L_{Aeq,T}$	The A-weighted sound level which contains the same acoustic energy as the varying sound occurring over the measurement period, T. It is commonly used to describe the average sound level over a period.
Free-field	A measurement or prediction position sufficiently far from significant reflecting surfaces that the measured sound level is not materially increased by reflections.
L_{AFmax}	The maximum A-weighted sound pressure level measured during a period using the Fast time weighting.
Noise-sensitive receptor (NSR)	A location where occupants may be sensitive to noise, such as a dwelling.
Octave band	A frequency band used to describe the frequency content of sound. The upper frequency limit of an octave band is twice its lower frequency limit.
Rating level, $L_{Ar,Tr}$	The specific sound level over the BS 4142 reference period, Tr, including any applicable acoustic feature corrections.
Reference time interval, T_r	The period over which BS 4142 assesses the specific sound. For this assessment, reference periods of one hour during the daytime and 15 minutes during the night-time have been used.

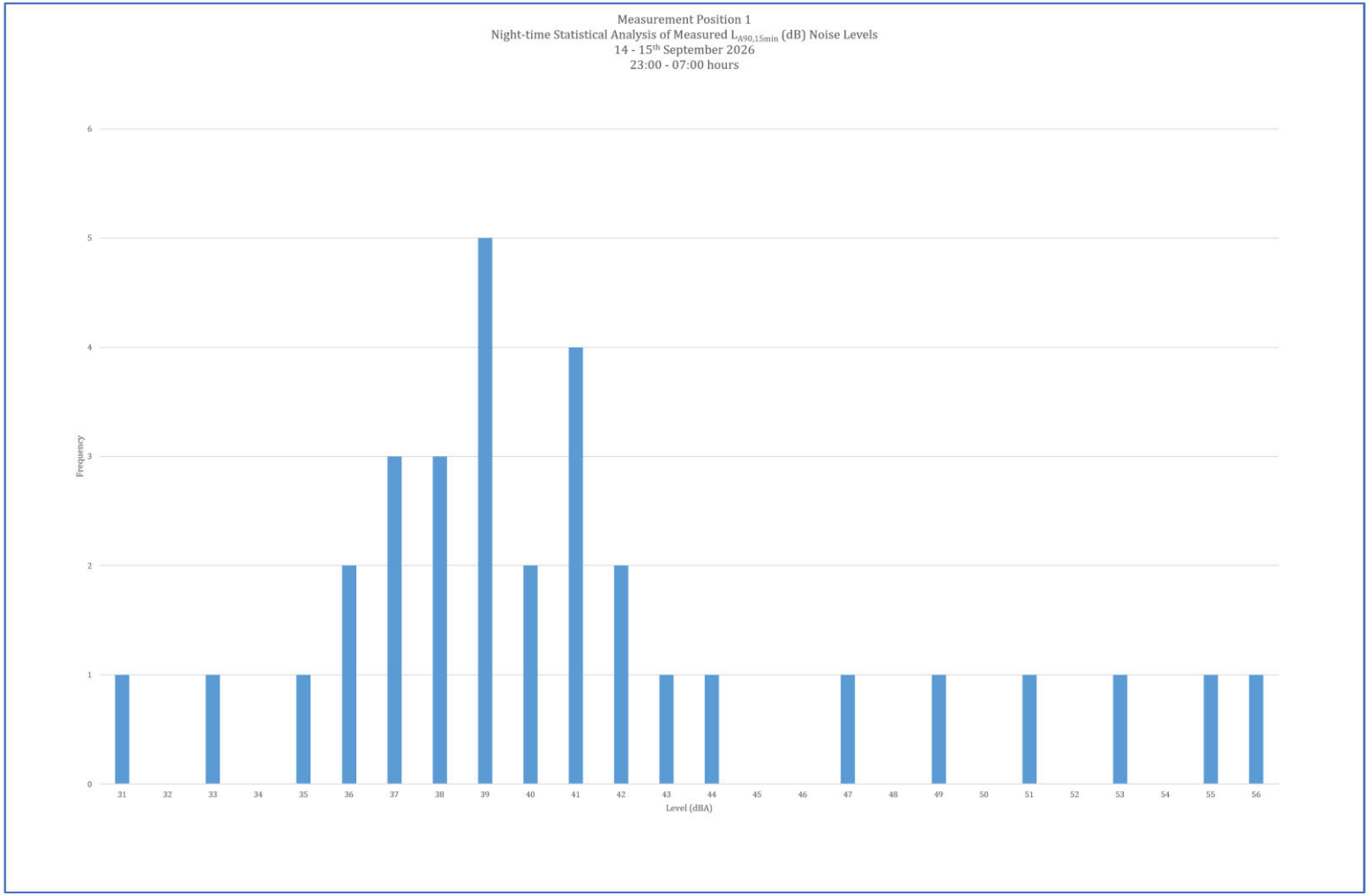
Reverberant sound pressure level	The sound pressure level within an enclosed space including the contribution from sound reflected from the room surfaces. In this report it is used to describe the assumed internal operational noise level within the proposed buildings.
Sound exposure level, SEL	A measure of the total acoustic energy associated with a discrete noise event, normalised to a reference duration of one second. It allows events of different durations to be compared and combined.
Sound power level, L_w	A measure of the total acoustic power emitted by a sound source, independent of the distance from the source. It is used as an input to environmental noise prediction models.
Sound reduction index, R	The frequency-dependent laboratory measure of the sound insulation provided by a building element, expressed in decibels.
$R_w + C_{tr}$	A single-number laboratory sound insulation rating comprising the weighted sound reduction index, R_w, adjusted by the C_{tr} spectrum adaptation term.
Specific sound level, $L_{Aeq,Tr}$	The equivalent continuous A-weighted sound level produced by the specific industrial or commercial sound source under assessment over the BS 4142 reference period, T_r.

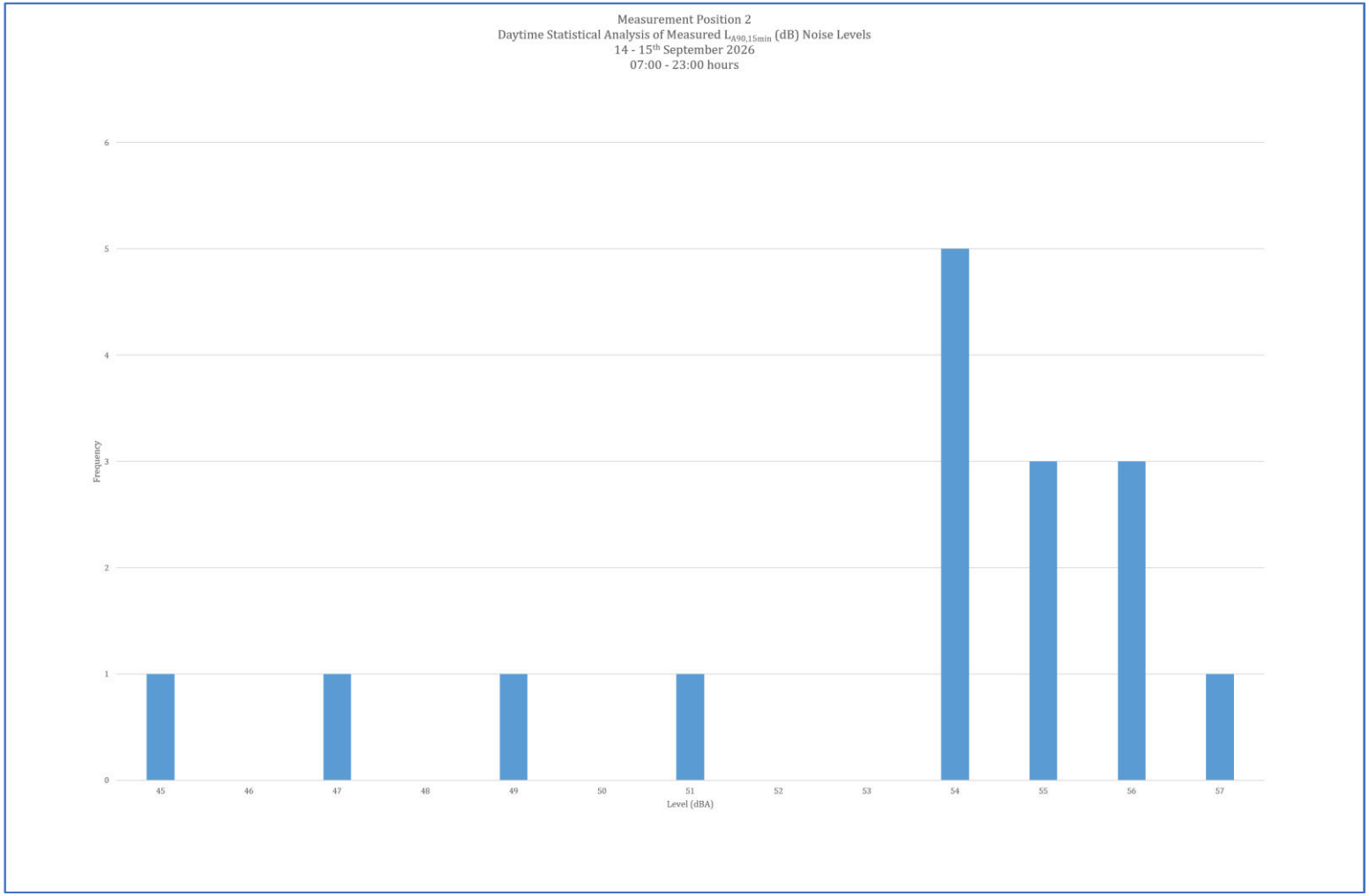
Appendix B - Time History Graph & Statistical Analyses

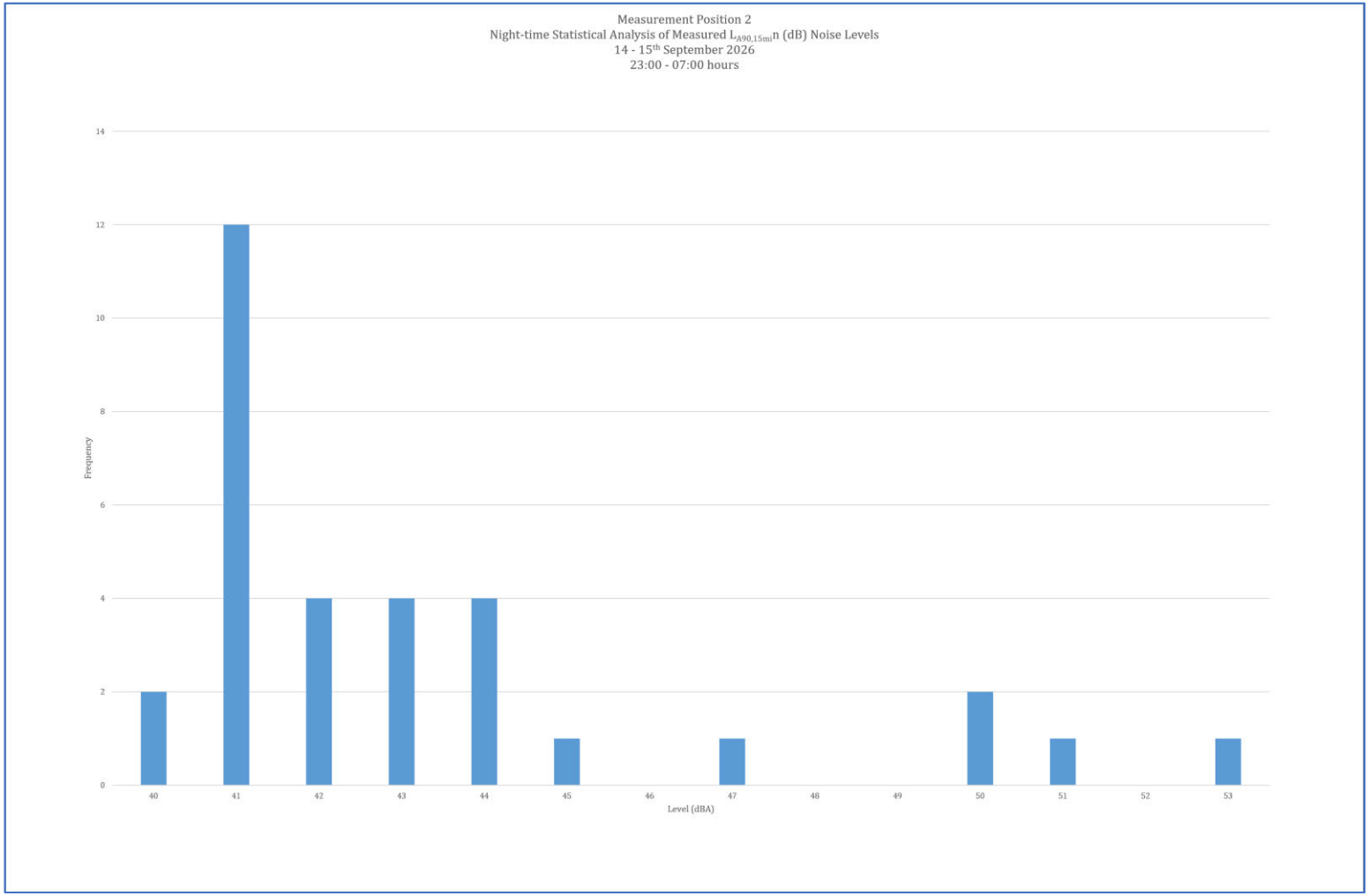



Land North of St Neots Road
Measurement Position 2 - St Neots Road (West)
Measured L_{Aeq}, L_{AFmax} & L_{A90} Time Histories
14/09/2026 - 15/09/2026
Sound Pressure Levels (dBA)
105.0
100.0
95.0
90.0
85.0
80.0
75.0
70.0
65.0
60.0
55.0
50.0
45.0
40.0
35.0
30.0
16:30
18:00
19:30
21:00
22:30
00:00
01:30
03:00
04:30
06:00
07:30
09:00
10:30
12:00
13:30
15:00
Time
LAeq
LAmax
LA90


Measurement Position 1
Daytime Statistical Analysis of Measured $L_{A90,1hour}$ (dB) Noise Levels
14 - 15th September 2026
07:00 - 23:00 hours
Frequency
0
1
2
3
4
5
6
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
Level (dBA)


Measurement Position 1
Night-time Statistical Analysis of Measured $L_{A90,15min}$ (dB) Noise Levels
14 - 15th September 2026
23:00 - 07:00 hours
Frequency
Level (dBA)
0
1
2
3
4
5
6
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56


Measurement Position 2
Daytime Statistical Analysis of Measured $L_{A90,15min}$ (dB) Noise Levels
14 - 15th September 2026
07:00 - 23:00 hours
Frequency
0
1
2
3
4
5
6
45
46
47
48
49
50
51
52
53
54
55
56
57
Level (dBA)


Measurement Position 2
Night-time Statistical Analysis of Measured $L_{A90,15min}$ (dB) Noise Levels
14 - 15th September 2026
23:00 - 07:00 hours
Frequency
Level (dBA)
0
2
4
6
8
10
12
14
40
41
42
43
44
45
46
47
48
49
50
51
52
53