



## **HORSHAM DISTRICT COUNCIL CONSULTATION**

<b>TO:</b>	Development Control
<b>FROM:</b>	Environmental Health and Licensing
<b>REFERENCE:</b>	DC/25/0102
<b>LOCATION:</b>	Land at Campsfield Linfield Close, Southwater, West Sussex, RH13 9FR
<b>DESCRIPTION:</b>	Outline application with all matters reserved except for access for up to 82 dwellings with vehicular and pedestrian accesses, public open space, noise mitigation measures, landscaping, foul and surface water drainage and associated works.
<b>RECOMMENDATION:</b>	Objection – further information required

Thank you for the consultation request dated 27.06.25, please find our comments below.

### **Noise**

Environmental Health have reviewed the 24 Acoustics Noise Assessment, dated 27.11.24, and the fact that a noise impact assessment has been provided in support of the application is welcomed. We do however have the following comments to make.

1. From reviewing Figures 3 and 4 we note that noise levels on the eastern façades of the eastern most dwellings i.e. those that face the A24, will be in the region of 55 to 60 dB during the day and 45 to 50dB at night. With windows open, allowing 15dB for an open window, internal noise levels in the habitable rooms that face the A24 are likely to be above both daytime and nighttime noise criteria as detailed in BS 8233: 2014 (Guidance on sound insulation and noise reduction for buildings). Individual noise events in these plots are also likely to exceed 45 dB LMax more than 10 times a night which is also not compliant with the above-mentioned guidance.
2. In order to achieve acceptable internal noise levels and prevent overheating windows on the façades of the plots which face the A24 would need to be kept closed and potentially costly mitigation and ventilation systems would need to be installed and maintained for the lifetime of the development.
3. With the above comments in mind and the need for windows to be kept closed to achieve acceptable internal noise levels we note that the overheating risks have not been considered – the need for ventilation and the prevention of overheating must also be considered. We are of the view therefore that a robust overheating assessment should be provided in support of the application.

### **Water Quality**

Environmental Health have reviewed the Nicholls Groundwater Investigation Report, dated 08.04.25, and we have the following comments to make.

1. We have compared the water quality results undertaken to date to the parameters as detailed in Schedule 1 of The Private Water Supplies (England) Regulations 2016 and we note that concentrations of iron, manganese, sodium, ammonium, turbidity and conductivity were all detected significantly above their respective maximum allowable concentration. The groundwater is therefore poor quality and given the proposed use of the water as a potable supply to the proposed development this is a significant concern to Environmental Health.
2. We from comparing the results to the above-mentioned Schedule 1 we also note that the groundwater samples collected were not tested for chloride, sulphate and total organic carbon (TOC) which is also a concern.
3. From reviewing the information in the appendices we are of the view that the borehole logs are insufficiently detailed. We have recently reviewed a Nicholls Groundwater Investigation report for site known as South Lodge where the logs have been provided in a different format which, in our view, was compliant with current British Standards. We ask therefore that the logs for this site are provided in this format.
4. With the above in mind we have reviewed section 6.0 of the report titled 'Concept Design' and we note that stage four of the treatment system will be a reverse osmosis (RO) system. Given the complexities associated with RO treatment systems Environmental Health do not have sufficient technical knowledge of water treatment systems to know whether RO is a suitable groundwater treatment option at this site. Similar to other planning applications in our District where RO has been proposed as a treatment option, once the concentrations of all likely parameters have been identified in the underlying groundwater the LPA will need to seek independent technical advice on the proposed RO treatment system.

5. We also note that a schematic is detailed in Appendix F. Whilst this level of detail is welcomed, similar to the above Environmental Health do not have sufficient technical knowledge of water treatment systems to know whether the proposed treatment train is suitable for the groundwater chemistry of this site.
6. Finally, we note that the underlying geology is the weald clay which we understand is classed as 'unproductive strata'. The LPA should therefore seek sufficient assurances that the proposed private water supply is sustainable in terms of yield for the lifetime of the development.

### **Contaminated Land**

Environmental Health have reviewed the SLR Preliminary Land Quality Risk Assessment, dated 12.12.24, and we have the following comments to make.

1. We are satisfied that the preliminary assessment of the risks from contamination to future site users has been adequately assessed.
2. We are of the view that a ground investigation should be undertaken to confirm ground conditions on the site and fully assess the risks to future site users.

We are however happy to request these investigations through suitably worded planning conditions, once we are happy that the above matter in relation to noise and water quality have been addressed.

### **Air Quality**

Comments on the SLR Air Quality Assessment, dated 18.12.24, will be provided under a separate cover.

### **Construction Phase**

During site clearance, preparation and construction there is the potential for local residents to experience adverse impacts from noise, dust and construction traffic movements. These should be minimised and controlled by the developer and a construction environmental management (CEMP) plan will be recommended as a condition, once we are happy that the above matters have been addressed.

### **ANY RECOMMENDED CONDITIONS:**

N/A

<b>NAME:</b>	Kevin Beer
<b>DEPARTMENT:</b>	Environmental Health and Licensing
<b>DATE:</b>	02/07/25