



## **HORSHAM DISTRICT COUNCIL CONSULTATION**

<b>TO:</b>	Development Control
<b>FROM:</b>	Environmental Health and Licensing
<b>REFERENCE:</b>	DC/25/0151
<b>LOCATION:</b>	Land To The North and South of Mercer Road, Warnham, West Sussex
<b>DESCRIPTION:</b>	Redevelopment of the site to provide 304 residential units, parking, a retail unit, public car park, public open space, attenuation basins and landscaping
<b>RECOMMENDATION:</b>	Objection – Further information required

## **Noise**

Environmental Health have reviewed the Southdowns Environmental Consultants Noise and Vibration Assessment, dated December 2024, Ref: 2374W-SEC-00001-08 and we have the following comments to make.

1. The fact that a noise impact assessment has been provided in support of the application is welcomed.
2. We note that the majority of the monitoring was undertaken in August 2020 which was shortly after the COVID lockdown and in a period of time when road/rail traffic and commercial activities were still getting back to normal. With this in mind, and given the presence of Wienerberger Ltd to the north of the site, an access road to industrial premises to the east of the site, the A24 to the south of the site and a railway to the west of the site, all of which are likely to have been impacted by COVID restrictions, we are concerned that the noise monitoring is not representative of current noise levels from the above mentioned noise sources.
3. Given the above we request therefore that additional measurements are undertaken to demonstrate that the conclusions in the report are still valid.
4. In order to achieve acceptable internal noise levels and prevent overheating windows on a large number of the plots will 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. The number of dwellings that require mitigation may also increase following the further noise monitoring as detailed above.
5. In our view the above mitigation should however be seen as the last solution once all available site layout solutions to address noise have been explored. This view is detailed in Figure 2/Note 5 of ProPG which states Designing the site layout and the dwellings so that the internal target levels can be achieved with open windows in as many properties as possible demonstrates good acoustic design.
6. We note that an assessment in accordance with BS 4142 has been undertaken which welcomed. We note however that the rated level in the northern most part of the site is up to 25dB above the background noise level and although mitigation is discussed in section 9 this elevation above the background is a significant concern to Environmental Health.
7. We are also aware that fixed plant associated with the Warnham Waste Heat Recovery and Fuel Switch project has been installed on the industrial premises to the north which will be an additional source of noise and postdates the 2020 noise assessment.
8. Given our above comments we are not convinced that the layout represents good acoustic design, as detailed in with ProPG – Planning and Noise. In particular the dwellings in the northern-most part of the site which will be subject to high levels of noise associated with industrial processes to the north.
9. Please note that these are not our final comments – we will be able to provide more detailed comments once the above-mentioned additional assessment has been undertaken and the current noise climate associated with the off-site sources of noise has been confirmed.

## **Contaminated Land**

Environmental Health have reviewed the Geo-Environmental Services Ltd Desk Study Report, dated 05.12.2018, and we have the following comments to make.

1. We note the site walkover, undertaken as part of the preliminary risk assessment, was undertaken in November 2018. Given the time since this walkover was undertaken we would grateful if the applicants consultants can confirm that the findings are still valid.
2. From reviewing historic maps we note that potentially infilled pits associated with Warnham brickworks are located to the north and north west of the site. These

potential sources of contamination do not appear to have formed part of the preliminary risk assessment (section 3.0).

3. We agree with the conclusions in the above-mentioned report in that a ground investigation should be undertaken to confirm ground conditions on the site and fully assess the risks to future site users and it is likely that we will request these ground investigation works through suitably worded planning conditions. Before agreeing to move to conditions we would however be grateful for the above points to be addressed in a revised desk study report.

### **Proposed Private Water Supplies**

Environmental Health have reviewed the Daedalus Environmental Water Neutrality Statement, dated March 2025, and we have the following comments to make.

1. We note that water neutrality requirements are not proposed to be met with an onsite private water supply such as a borehole or rainwater harvesting system. Should this change we request that we are re-consulted.

### **Air Quality**

Comments on the South Downs Environmental Consultants Air Quality Assessment, dated December 2024, have been 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>	09/05/25