



## **HORSHAM DISTRICT COUNCIL CONSULTATION**

<b>TO:</b>	Development Control
<b>FROM:</b>	Environmental Health and Licensing
<b>REFERENCE:</b>	DC/25/1269
<b>LOCATION:</b>	Land North of Guildford Road, Bucks Green, Rudgwick, West Sussex
<b>DESCRIPTION:</b>	Outline Planning Application for up to 90 no. residential dwellings (including 40% affordable) all matters to be reserved apart from access.
<b>RECOMMENDATION:</b>	Further information required

## **MAIN COMMENTS:**

### **Noise**

Environmental Health have reviewed the Acoustic South East Noise Impact Assessment, dated 27.05.25, 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 the above report we note that with windows open internal noise levels in the properties in the south-western corner of the site i.e. those nearest the A281, will be above the internal noise criteria detailed in BS 8233 for both daytime and nighttime hours. L<sub>Amax</sub> levels during the nighttime hours are also a likely to be a cause for concern.
2. In order to achieve acceptable internal noise levels and prevent overheating windows on the properties closest to the A281 would need to be kept closed and potentially costly mitigation and ventilation systems would need to be installed and maintained of the lifetime of the development.
3. 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.*
4. Given our above comments we are not convinced that the layout represents good acoustic design, as detailed in with ProPG – Planning and Noise. In our view there seems to be adequate space within the footprint of the development to move the dwellings in the south western part of the development to another part of the site so that they are not located in the noisiest part of the development. This would obviate the need for mitigation measures and the costs of maintaining these measures for the lifetime of the development.
5. We also note the comment in section 6.4 *The noise mapping predictions indicate that all garden spaces will be below 50dB LAeq, 16 hour which comfortably achieves the requirements of BS8233:2014 and ProPG2017.* From reviewing Figure 12 in the above-mentioned report I would appear however that a number of gardens in the south western part of the site are above the 50dB criteria in BS8233 which is also a concern.

### Additional Comments

6. Whilst the report assesses the impact from road traffic noise, which is welcomed, from reviewing the proposals we note that a 'sub station' is proposed in the north western part of the site. The potential noise impacts from this on proposed residential amenity should also form part of the proposals.
7. It is also not clear if air or ground source heat pumps are proposed. If they are then detail on the locations of these should be provided in support of the application.

### **Contaminated Land**

Given the scale of the development and the fact that the proposed use is sensitive to the presence of contamination the application should be supported by a preliminary contamination risk assessment (PCRA), undertaken by suitably competent and experienced environmental consultant. We note however that no such assessment has been provided.

### **Water Neutrality**

We have reviewed the Daedalus Environmental Water Neutrality Statement, dated June 2025, and we note the comment in section 2.2.5 *'the Applicant will also install rainwater recycling systems to the properties to supply water for non-potable uses including WC flushing and garden irrigation'* given the recent changes in water neutrality requirements

in our District we would be grateful for confirmation whether the proposals still include rainwater harvesting. If they do then further information on the maintenance and management of the systems will be required in the support of the application.

#### **Air Quality**

Comments on air quality 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.

#### **Summary**

Environmental Health are not against the principle of residential development of this site, however given our comments above, in particular our comments in relation to noise impacts, we are not currently in a position to support where we can support this application.

#### **ANY RECOMMENDED CONDITIONS:**

N/A

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<b>DEPARTMENT:</b>	Environmental Health and Licensing
<b>DATE:</b>	21/11/25