



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DC/25/1019
LOCATION:	Land To The West of Shoreham Road, Small Dole, West Sussex
DESCRIPTION:	Outline planning application for up to 45 dwellings (including affordable homes) with all matters reserved apart from access.
RECOMMENDATION:	Objection – further information required

MAIN COMMENTS:

Noise

Environmental Health have reviewed the RSK Acoustic Planning Report, dated 03.04.25, and the fact that a report of this nature has been submitted in support of the application is welcomed. We do however have the following comments to make.

1. From reviewing the report we note that noise levels on the eastern facades of plots 1-8 and plots 28 and 29 i.e. those closest to the A2037 will be in the region of 54dB. With windows open, allowing a 13dB for an open window, internal noise levels during periods of warm/hot weather will be in the region of 41dB and so above the internal noise criteria detailed as in BS 8233: 2014 (Guidance on sound insulation and noise reduction for buildings). Individual noise events in these plots is also likely 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 above plots which face the A2037 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.
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. We note the comment in section 4.6 *All assessed external amenity are within the BS8233 recommended upper limit of 55dB LAeq,16h, with a significant majority of the site within the desirable limit of 50dB LAeq,16h.*
5. The proposed development is not, for example, a development in a city centre or near an existing transport network where development may be desirable and where alternative layouts are limited – this is a greenfield development near to a major road where, in our view, the potential impacts from road traffic noise can be designed out. Given this we therefore consider the 50dB criteria for external amenity spaces to be applicable to this site, it is however not clear from the supporting information how many of the proposed dwellings will, even with mitigation, still be subject to noise levels in amenity spaces of 50dB or above.
6. 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 more than enough space within the footprint of the development to move these plots to the west 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.

Water Neutrality

We have reviewed the Nicholls Groundwater Investigation Report dated 21.01.25, submitted as Appendix F to the Motion Water Neutrality Statement dated 21.07.25, and we have the following comments to make.

1. We have compared the water quality results undertaken to date to the parameters detailed in Schedule 1 'Prescribed concentrations or values' of The Private Water Supplies (England) Regulations 2016 and we note cyanide is missing from the results which is a concern.
1. The borehole log provided is also not sufficiently detailed and, our view, is not compliant with current British Standards. Nicholls have provided logs for other sites which we have accepted, we would be grateful therefore if a borehole log that is compliant with current British Standards is provided for this application.
2. The southern boundary of the site is located approximately 340m from the northern boundary of Small Dole landfill which although is lined Environmental Health understands has been subject to leakages of leachate. Whilst the

groundwater sampling undertaken to date has not detected any elevated concentrations, which is welcomed, given the close proximity of the landfill to the site we are concerned that chemical contaminants associated with the landfill could be present in the underlying groundwater which have not been tested for. Further assessment of the risks to the potable water supply from the landfill is therefore required.

3. Given the above and the fact that the proposals involve a potable abstraction in close proximity to a licenced landfill site we would also strongly recommend that the Groundwater, Hydrology and Contaminated Land for the Solent and South Downs Area at the Environment Agency are formally consulted on the proposals.

Land Contamination

Environmental Health have reviewed the Geo-Environmental Services Limited Ground Appraisal Report, dated 02.04.25, and we have the following comments to make.

1. We are satisfied with the preliminary assessment of the risks from contamination to future site users.
2. In our view the most likely on-site source of contamination on a greenfield site such as this is any made ground associated with historic activity on the site. With this in mind we note that made ground soils were detected between 0.30m and 0.50m in WS03 and between 0.25m and 0.60m in WS04. It would appear that the sampling of this made ground material was undertaken from WS03 but the material encountered in WS04 was not subject to any chemical testing (the laboratory certificates indicates that the strata above it was subject to chemical testing).
3. We appreciate that WS03 and WS04 are not located in the part of the site that will become dwellings with private gardens, they are however located within the red boundary line and, from reviewing the proposed plan, are located in an area that will become a community orchard.
4. Given the above we are of the view that some further investigation is required on the site, we however happy to recommend this through suitably worded planning conditions. Suitably worded planning conditions will therefore be recommended once the matters have been addressed.

Air Quality

Comments on air quality have been provided under a separate cover dated 21.08.25

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

Given the above we are of the view that the application is currently insufficiently detailed to be determined.

ANY RECOMMENDED CONDITIONS:

N/A

NAME:	Kevin Beer
DEPARTMENT:	Environmental Health and Licensing
DATE:	03/09/25