

Robin Carr
Landacre Developments Limited
(Via email)

15/09/2026

Dear Robin

Land East of Henfield Road (A281) Cowfold

I write further to site of comments made from Horsham District Council dated 28/08/2026. Specifically, the comments are noted to be from Kevin Beer within Environmental Health and Licensing. The noise comments are as follows:

MAIN COMMENTS:

Noise

Environmental Health have reviewed the Acoustic South East Noise Impact Assessment and we have the following comments to make.

1. An EHO has recently visited the site and commercial/industrial noise from the yard located beyond the south western corner of the site and the sewage treatment works located beyond the eastern boundary were noticeable in the western and eastern parts of the site respectively.
2. The fact that a noise impact assessment has been provided in support of the application is welcomed, given the offsite commercial/industrial noise sources, as detailed above, we would however expect an element of the noise assessment to include an assessment in accordance with BS 4142:2014 (Method for rating and assessing industrial and commercial sound). An assessment in accordance with BS 4142 does not however appear to have formed part of the noise assessment.
3. Further to the above – we note that the noise monitoring locations were positioned close to the above-mentioned off-site sources of noise and measured for LAeq 16hr and LAeq 8hr. In our view this not however provide a representative indication of the noise impact from the above-mentioned sources of noise.
4. We also note that a residential dwelling (Oaklands) is located in very close proximity to the proposed access road to the development, it is however not clear from the noise report what impact vehicle movements on the proposed access road will have on the amenity of this dwelling.

It is useful when responding, to place these comments in context and the following narrative is offered.

1. The planning application being made is an outline application only. The layout submitted is illustrative, therefore an Acoustic Design Statement could be requested at reserved matters or condition stage to demonstrate that the final scheme aligns with the conclusions of the submitted report.

2. The methodology employed in the reporting is clear in exactly where the noise monitoring took place and why the locations were selected to ensure that the site data collection was robust. This deliberately included the Yard location (Clark Lifting) as well as the Water Treatment Works.
3. The dominant part of the site soundscape is the A281 main road.
4. All data has been presented and included with the agent of change principle used to ensure that a worst-case hour was modelled. This included the use of a worst case measured hour (free-field) at the LT1 survey position of 58dB $L_{Aeq,1}$ hour (Thursday 15:00-16:00 hours).
5. The Environmental Protection Officers comments seem to be related to the Clark Lifting Yard which operates Monday to Friday from 08:00 to 17:00 hours. As stated within the reporting, the sound from the water treatment works is continuous and does not change when assessed at the site's Eastern boundary. The sound from the Water Treatment Works is not audible within the main body of the site and there is a deliberate design buffer on the site's eastern development boundary.
6. It is not entirely clear why a BS4142 assessment is required, as the standard is clear in that section 8.5 discusses that where receptors are to be introduced and what measures should be considered (see extract below). The client does not have any control over the third-party premises and it is not clear from the dataset which sounds from the yard may have contributed to the worst-case hour. In the 4 visits that were made to set up and decommission the LT1 position close to the yard, subjectively, no commercial sound sources were noted.

NOTE Where a new noise-sensitive receptor is introduced and there is extant industrial and/or commercial sound, it should be recognized that the industrial and/or commercial sound forms a component of the acoustic environment. In such circumstances other guidance and criteria in addition to or alternative to this standard can also inform the appropriateness of both introducing a new noise-sensitive receptor and the extent of required noise mitigation.

7. The planning noise advice document, Sussex (PNADS) which Horsham District Council are a signatory to does not require such a BS4142 assessment. Section 2.6 relates to a new noise source being introduced near noise sensitive premises. Similarly, section 3.2.4 states "Of note, where industrial or commercial noise contributes to the acoustic environment but it is evident that it is not dominant it may be included in to a ProPG: Planning and Noise Assessment for new residential development. In this instance there may not be the requirement for a BS4142 assessment". Within the reporting, the ProPG assessment is based on the worst-case plot (9) and concludes a low risk in terms of developing the site.
8. The LT1 monitoring period was clear in that it had periods with and without the yard in operation. Figure 5 may easily be cross referenced against noise model inputs in 4.1. The Friday 8th May was not used due to strimming of the site occurring. The LT1, figure 5 data show the Sat and Sun data as noisier with the yard closed than the Tues and Wed with the yard open. This does use the $L_{Aeq,16}$ hour period, as this is what is applied from BS8233:2014 and the World Health Organisation Guidelines for Community Noise dated 1999, revised 2018.

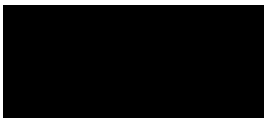
9. The Clark Lifting “Yard” is a single daytime sound source that operates only Monday to Friday.
10. The noise modelling assessment was undertaken without a fence-line applied to the yard, as can be seen from the metal palisade fencing in Figure 4 of the reporting.
11. The $L_{A90,15\text{minute}}$ periods were reviewed for the LT1 position. Given the $L_{A90,15\text{minute}}$ period is already a percentile, it is not appropriate to consider arithmetic or logarithmic averaging, only a modal assessment is appropriate. This is the most frequently occurring value. This was carried out with the 08:00-17:00 hours data (Clark Lifting Opening Hours) for days with the site closed, as well as the site operating, as measured at LT1. This showed that for the Saturday (2nd), Sunday 3rd and Bank Holiday Monday (4th) the measured representative background is 41dB $L_{A90,15\text{minutes}}$ with the yard closed. For the Tuesday 6th to Thursday 7th with the yard operating as normal, the $L_{A90,15\text{minutes}}$ was 42dB $L_{A90,15\text{minutes}}$. The change of 1dB would not be perceptible. It is also noted that this was measured at the survey position at 4.9m from the yard boundary. It is logical to deduce that sound will attenuate further for plot 9 which has the building façade at approximately 20m in distance and a separating privacy fence.
12. An assessment of traffic/vehicle movements and their impact on Oaklands was not carried out due to the outline nature of the application. The Oaklands property would be separated in any case by a boundary treatment. The footway and road into the site will not be a through road, so vehicles using the access would only be visiting the site.

In conclusion, the extent of the acoustic report is considered sufficient to satisfy an outline planning application. All sound sources have been appropriately considered to ensure that future residents remain protected against adverse noise events and levels.

The ProPG2017 initial site risk assessment indicates a low risk of developing the site, and a comparison of hours with and without the Clark Lifting Yard in operation shows only a 1dB difference at the long-term survey position. This is considered to be negligible and would not be audible under normal listening conditions.

Any questions or queries, please do not hesitate to call.

Yours sincerely



Scott Castle
Managing Director
Acoustic South East