HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DC/24/1273
LOCATION:	Orchard Farm, Emms Lane, Brooks Green, Horsham, West Sussex, RH13 0TR
DESCRIPTION:	Change of use of former packing station from agriculture to commercial storage (Class B8) together with associated alterations and parking (Retrospective)
RECOMMENDATION:	Further information required

MAIN COMMENTS:

Noise

Environmental Health have reviewed the RF Environmental Noise Impact Assessment and we have the following comments to make.

1. The above information reports on an assessment in accordance with BS4142:2014+A1:2019 which is welcomed.
2. The report concludes that there is likely to be 'low impact' from noise on existing residential amenity. The BS4142 assessment in the report is however based on a very particular pattern of activity (for example up to 2 HGV movements in 1 month) and assumes the that this pattern of activity will be maintained in the future – this may or may not be representative of use of the site in the future.
3. The proposed B8 use class covers a wide range of activities and therefore if the pattern of use and activity were to increase in the future, for example under a different B8 use, then the potential noise impacts on nearby residential amenity would also increase.
4. We note that comments in relation to rating penalties are detailed in section 5.5, there does not however appear to be any comments in relation to intermittency and impulsivity and why these have not been applied to assessment.
5. Experience from similar sites has also shown that LAmax events are the main cause of complaints, it is however not clear what level of LAmax impact is expected from the proposed development, both from the application site and from vehicles passing by existing residential dwellings on the access road to the proposed development.
6. Given the low background noise levels in this part of Horsham District, as quantified in the noise report which indicates LA90 noise levels in the region of 33dB during the day (0700-2300), any LAmax noise events associated with the proposed development have the potential to have an impact on existing residential amenity.

Air Quality

Environmental Health have reviewed the Redmore Environmental Air Quality Assessment, dated 18.06.24, and we have the following comments to make.

1. The Sussex Air Guidance takes the precautionary principle approach, and the Damage Cost Calculation should include all transport movements from the proposed development, as it is these emissions which are to be mitigated. It is requested the emission mitigation assessment is reviewed to include total proposed vehicle movements.
2. The guidance also aims to avoid the duplication of measures that would normally be required through other regimes. It should be clearly stated in the report how the proposed mitigation measures are over and above of what is considered policy-compliant requirements.

Land Contamination

1. Given the historic agricultural use of the site, a land use which Environmental Health considers potentially contaminating, the application should be supported by a Phase 1 Preliminary Contamination Risk Assessment, undertaken by a suitably competent and qualified environmental consultant.
2. We note the comments in sections 4.29 to 4.31 of the Planning Statement in relation to land contamination and have provided some response to this below.
3. It is not bird flu and the contaminants associated with the current/recent use of the buildings used to house chickens which is our concern. From reviewing our GIS it is apparent that the land within the red boundary line has had an agricultural use, a land use which Environmental Health considers potentially contaminating, since at least 2001. The fact that solid concrete floors are now

present in the buildings is welcomed, our concern however is contamination associated with the site historic agricultural use.

4. We appreciate that no breaking of ground is proposed, the risk from contamination to the proposed use, through a change of use application, does however still requiring assessment. In the first instance this should take the form of a preliminary contamination risk assessment (PCRA).

Proposed Water Supply

From reviewing the water neutrality statement we note that water neutrality requirements are not proposed to be met with a rainwater harvesting scheme or an onsite borehole. Should this change and a private water supply is proposed then we would ask that we are re-consulted.

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.

Suggested Conditions

N/A

NAME:	Kevin Beer
DEPARTMENT:	Environmental Health and Licensing
DATE:	19/11/2024