



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DC/26/0530
LOCATION:	Land at Hornbrook Farm Brighton Road West Sussex
DESCRIPTION:	Outline planning application for up to 180 dwellings, open space and associated works and infrastructure with all matters reserved apart from access.
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: Comments relating to below information: Geo-environmental Desk Study Report by Obsidian Geo-Consulting dated 17 th February 2026 Geo-environmental Desk Investigation Report by Obsidian Geo-Consulting dated 17 th February 2026 Cass Allen Noise Assessment, dated 23.02.26 Summary Environmental Health has reviewed the submitted documents and provides the following comments. We would be content for any necessary follow-up arising from the site investigation report to be secured by condition. However, we consider that the matters raised in relation to the desk study should be addressed prior to determination of the application.	

MAIN COMMENTS:

Geo-environmental desk study report

1. The submission of the Geo-environmental Desk Study report is welcomed. The inclusion of historical mapping and supporting figures is particularly helpful in illustrating the site's historical development. The report appropriately identifies an area of made ground associated with the former bungalow as a potential contaminant source, and Environmental Health supports the proposed focus of site investigation in this location.
2. However, an additional area of potential concern has been identified. The Ordnance Survey mapping from 1964 indicates a slope in the north-western part of the site, falling towards Horn Brook. This feature is also evident on mapping from 1974 and 1977 but is no longer present on the 1993 edition or subsequent mapping. This change suggests that the area may have been subject to infilling and could therefore represent an area of made ground. This has not been identified or discussed within the report. It is recommended that this area is included within the scope of the site investigation to confirm the presence or absence of made ground and to ensure that any associated risks are appropriately assessed.
3. With regard to the risk assessment presented in Table 4.1, whilst potential sources of contamination are identified and assigned risk ratings, the methodology used to derive these ratings is not clearly set out. For clarity and transparency, it is recommended that the report includes a defined risk assessment framework, such as a risk matrix, demonstrating how the assigned risk levels have been determined based on likelihood and severity. This would provide appropriate justification for the conclusions reached.

Geo-environmental investigation report

4. The sample locations appear to be suitably distributed across the site. However, it is noted from the laboratory analysis reports that not all sampling locations have been analysed. Clarification is requested as to the rationale for analysing only a subset of the collected samples.
5. Whilst soil samples have been obtained at multiple depths, it appears that, for each location submitted for analysis, only a single depth has been tested. For example, at TP20, samples were collected at depths of 0.1m, 0.5m, 0.75m, and 1.0m, yet only the 0.5m sample has been analysed. This approach may fail to adequately characterise contamination, particularly given that the near-surface layer may comprise made ground. Environmental Health therefore recommends that additional analysis is undertaken, including shallower samples, and a condition has been suggested accordingly.
6. As noted in paragraph 2, there is particular interest in the north-western part of the site where potential infilling has been identified. WS23, located within this area, records the deepest topsoil horizon across the site, which may be indicative of infilling. The applicant is requested to provide commentary on this finding and to confirm whether further investigation is proposed to determine whether historical infilling has occurred.
7. Elevated concentrations of PAHs have been recorded at WS04. Whilst the exceedance is marginal, adjacent sampling locations (TP01, WS03, TP05, and TP02) have not been analysed. As such, it is not possible to determine whether

the elevated result represents a localised hotspot or forms part of a wider area of contamination. Environmental Health therefore requests that samples from adjacent locations are analysed to allow a more robust assessment of the extent of contamination.

Noise Assessment

Environmental Health have reviewed the Cass Allen Noise Assessment, dated 23.02.26, and we have the following comments to make:

8. The above provides a report on an environmental noise survey at the site between 27.03.25 and 31.03.25. We note that the following is illustrated in section 5.8 in relation to noise levels in the southern part of the site:
 - Average noise levels during the daytime - 62 dB LAeq,0700-2300hrs
 - Average noise levels during the night-time - 54 dB LAeq,2300-0700hrs
 - Typical maximum noise levels during the night-time - 75 dB LMax
9. Whilst detail on noise levels along the southern part of the site have been provided it is not clear what noise levels are predicated to be in the eastern part of the site i.e. the part of the site closest to Doomsday Lane. We appreciate that noise levels in the eastern part of the site are unlikely to be as high as southern part, Doomsday Lane does however see a high number of vehicle movements, in particular during the morning and evening rush hours, the impact from road traffic noise associated with this road therefore also needs to be considered.
10. We note that façade calculations are provided in Appendix 3 is welcomed, so that it is clear what noise levels will be across the site and how they will respond to the layout as currently proposed we would also be grateful if information on noise levels can be presented as a 3D noise model, with the proposed layout overlaid.
11. Once the above information has been provided we may have further comments to make on the layout as currently proposed and any proposed mitigation.

SUGGESTED CONDITIONS

Pre-Commencement Condition:

No development (other than that required to carry out the investigation) shall commence until a further site investigation and risk assessment has been submitted to and approved in writing by the Local Planning Authority. The investigation shall address the following:

- a) A clear rationale for the selection of sampling locations that have been subject to laboratory analysis, including justification for any locations or samples that have not been analysed.
- b) Additional chemical analysis of soil samples to ensure adequate vertical characterisation of contamination, including the testing of shallow (near-surface) samples where made ground is present, with particular reference to TP20 and any similar locations.
- c) Targeted investigation within the north-western part of the site to assess the potential presence of made ground associated with historical infilling, including further sampling and analysis in the vicinity of WS23 and any other relevant locations.
- d) Further assessment of the elevated polycyclic aromatic hydrocarbon (PAH) concentrations identified at WS04, including analysis of samples from adjacent locations (including TP01, WS03, TP05 and TP02) to determine whether the exceedance represents a localised hotspot or a wider area of contamination.

The submitted report shall include an updated conceptual site model and a revised risk assessment, taking into account the findings of the additional investigations.

The development shall thereafter be carried out in accordance with the approved details, unless otherwise agreed in writing by the Local Planning Authority

Reason:

To ensure that contamination risks associated with the site are properly investigated and assessed to protect human health, controlled waters, and the environment.

NAME:	Georgina Hermitage
DEPARTMENT:	Environmental Health and Licensing
DATE:	23/06/2026