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By Email Only

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Dear Alice

DC/26/0592- Land at Lower Broadbridge Farm – Environmental Health Officer’s Consultation Response (11th June 2026)

I write further to the receipt of the Environmental Health Officer’s consultation response to the application (HDC ref. DC/26/0592) dated 11th June 2026. The Officer has requested further information be provided and the comments are numbered 1-9, as followed in the responses below (**blue text** – EHO; **red text** – Applicant), which has been prepared by Nexus Planning and Cass Allen on behalf of the Applicant.

It should be noted that a meeting took place between the Applicant, Cass Allen, Nexus Planning, the Environmental Health Officer and Matthew Porter (Principal Planning Officer) on 26th February 2026 as part of the pre-application process (ref. PE/25/0222), with further email exchanges taking place in March 2026.

1. The above provides a report on an environmental noise survey at Land at Lower Broadbridge Farm between 03.02.26 and 09.02.26. We note that the following is detailed in Appendix 2 in relation to noise levels in measurement locations L1, L2, N3 and N4 i.e. those closest to the A264.

- Average noise levels during the daytime – 72dB LAeq,0700-2300hrs
- Average noise levels during the night-time – 63dB LAeq,2300-0700hrs
- Typical maximum noise levels during the night-time – 82dB LAmx

We agree with this interpretation of the noise survey.

2. We note the modelling results have been provided in Appendix 3 which is welcomed, however when the figures titled ‘Daytime noise levels (LAeq,16hr) at 1.5m above ground level’ and ‘Nighttime noise levels (LAeq,8hr) at 1.5m above ground level’ are enlarged these two figures become illegible. We would therefore be grateful for these two figures in a higher resolution – we will have further comments to make on internal noise levels, ventilation etc once these have been provided.

Please find the revised report, which includes higher resolution images.

3. We note the comments in section 4.33 in relation to the localised 2.4m high fence around gardens where noise levels are highest along with a 3m high fence along the southern and eastern edges of the site. From discussing fence heights with the Planning Officer it is however not clear if these fence heights are acceptable to the LPA.

In this instance, the use of 2.4m high fencing is limited across the Site and the landscape strategy demonstrates the fencing will be screened and not harmful to the appearance of the area. We consider the garden areas of the dwellings with 2.4m fencing will provide a high-quality living environment for the future occupiers, with adequate garden space, commensurate with the size of the dwelling.

The 3m high fencing along the southern and eastern edges of the Site is set back from the road, generally screened by existing trees and hedges along the Site frontage, and its appearance would not unacceptably harm the wider character of the area.

Paragraph 206 of the Inspector's appeal decision (ref. APP/Z3825/W/23/3321658) and Condition 13, clearly envisages acoustic fencing to be included in accordance with Appendix 1 to the Noise Impact Assessment (Cass Allen Associated Ltd, Revision 3, dated 11th July 2023), which does show the use of 2.4m and 3m fencing across the Site. The change in the location of the fencing has arrived due to the constraints of an easement not allowing an acoustic barrier to be installed across the whole frontage of the Site. Additionally, the increase of the acoustic barrier fence to 3m along the site frontage, was accepted through the pre-application discussions in order to limit the extent of 2.4m fencing to plot boundaries and instead predominantly use 1.8m fencing.

Strategic Policy 24 (Environmental Protection) of the Horsham District Planning Framework (HDPF, 2015) requires development to minimise exposure to and the emissions of pollutants, including noise.

Policy 33 (Development Principles) of the HDPF (2015) seeks to conserve and enhance the natural and built environment with the development needing to ensure they are design to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land, for example through overlooking or noise; whilst having regard to the sensitivities of surrounding development. It should be noted that this policy relates to nearby properties and land rather than on development sites themselves.

The Applicant maintains the propose a balance needs to be taken by the Planning Officers regarding maintaining an acceptable living environment for future occupiers, visual amenities of the area, and the delivery of much needed affordable and market housing.

4. We note that even with the above fence heights noise levels in amenity spaces in the southern and eastern part of the site are still above the 55dB criteria in BS8233. We would therefore be grateful if Cass Allen can confirm if the all the modelling in Appendix 3 is based on the above-mentioned fence heights.

We confirm the modelling set out in the Noise Impact Assessment (March 2026) is based on the above-mentioned fence heights

5. We have reviewed the figure titled 'Daytime external amenity noise levels (LAeq,16hr) at 1.5m above ground level' and we note that approximately 17 of the plots in the south-western part of the site will be subject to noise levels above the 55dB criteria detailed in BS8233.

6. With the above comment in mind we note the comments in section 4.36 in relation to 2dB over the 55dB criteria, however as detailed in WHO guidance health effects from noise exposure increase significantly when noise levels exceed 55 dB. 55dB is also widely accepted as the upper limit for daytime noise in gardens and residential outdoor amenity spaces because it represents the threshold where noise becomes a significant source of annoyance and begins to negatively impact the usability of the space.

7. We also note that reference has been made to the Appeal Statement of Common Ground and comments in relation to an acceptance of 57dB as the 'upper limit' for this site. We have however reviewed the DMH Stallard 'Statement of Common Ground', dated September 2023, and have been unable to find any reference to 57dB. There is a statement that noise levels in gardens are acceptable, crucially this is however subject to detailed design at the reserve matters stage. We would therefore be grateful if Cass Allen can confirm how they have formed the view that an upper level of 57dB has been accepted.

The submitted Plans demonstrate that there are minor exceedances of 1-2 dB for garden noise levels in a small number of gardens, however, as set out in paragraph 4.34 of the Noise Impact Assessment (March 2026) these are considered very small exceedances of the guidelines for external amenity areas provided within BS8233 and was also accepted at the Appeal stage. BS8233 does not require 55dB to be achieved, but only best practicable measures are employed, which has been demonstrated through the submission.

From our experience, 58 dB is normally an acceptable level, as it represents a 3dB increase on the BS8233 guidance of 55dB (a 3dB increase is the smallest change in noise levels that can be heard outside test laboratory conditions). Our understanding was that this minor exceedance was also agreed by the Planning Officer at the pre-application stage, when taking a balanced assessment of the overall scheme.

Nevertheless, paragraph 4.45 of the Noise Impact Assessment (11th July 2023), is set out below, which identified 104 gardens in the proposed development would be within 1-2dB of BS8233 guideline values (i.e. up to 57dB), a position that was accepted by the Council through the Statement of Common Ground (page 25 of the DMH Stallard Statement of Common Ground dated September 2023) and by the Appeal Inspector. This proposed development has significantly reduced the number of gardens that marginally exceed the guideline values (17 plots only).

- 4.45 The modelling results show that with the recommended fencing and layout changes, transportation noise levels in all 104 gardens of the development are within 1-2dB of the BS8233 guideline value of 55dB. To put this magnitude of change in context, a 3dB change in level is the smallest difference that is perceptible in a normal scenario, i.e. changes of less than 3dB would not be audible in normal listening conditions as is this case here¹. Given that the predicted levels are within 1-2dB of the criteria it can be assumed that differences would be imperceptible. Therefore, the changes result in a significant improvement compared to the two previous proposed layouts and demonstrates excellent acoustic design.

8. We appreciate that there are constraints in south western part of the site, it is however a reasonable expectation that future residents will expect a good level of amenity which, in our view, is not currently the case for residential plots in this part of the site – in our view the majority of the plots in the south western part of the site will have poor quality amenity spaces.

As set out above and the submission material, we consider the minor exceedances of 1-2dB in a small number of dwellings, combined with the high quality public open space on-site, does provide a high-standard of amenity and an acceptable living environment for future occupiers, as required by the NPPF.

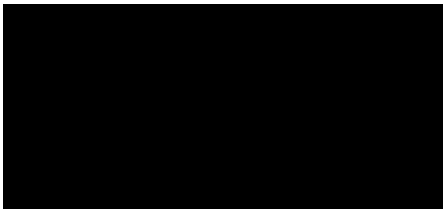
Through the pre-application discussions, it was clear that the Planning Officer was looking for a looser knit arrangement to the south-western parcel of the development site to ensure a high-quality design and layout. The layout in this part of the site went through an iterative design process, taking on board feedback from the Environmental Health Officer at the preapplication stage and was duly amended. The Planning Officer came to a

balanced position that took account of the noise constraints and accepted these had been accommodated without significant compromise to the layout.

9. We will have further comments to make the once the information detailed above has been provided, however based on the information that has been provided to date we remain unconvinced that the layout as currently proposed represents good acoustic design, as detailed in with ProPG – Planning and Noise.

Noted and we look forward to receiving further comments in due course.

Yours sincerely



Matt Harris
Associate

