

From: Planning@horsham.gov.uk <Planning@horsham.gov.uk>
Sent: 02 September 2026 10:08:09 UTC+01:00
To: "Planning" <planning@horsham.gov.uk>
Subject: Comments for Planning Application DC/26/1089
Categories: Comments Received

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 02/09/2026 10:08 AM.

Application Summary

Address:	Collyers School 82 Hurst Road Horsham West Sussex RH12 2EJ
Proposal:	Phased development of a Technology Centre consisting of two buildings, associated landscaping, and reconfigured access and parking.
Case Officer:	Alice Johnson

[Click for further information](#)

Customer Details

Address:	13 Hurst Avenue Horsham
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Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Design - Highway Access and Parking - Loss of General Amenity - Other - Privacy Light and Noise - Trees and Landscaping
Comments:	Objection to Planning Application: DC/26/1089 Address of Proposed Development: The College of Richard Collyer, Hurst Road, Horsham, RH12 2EJ Nature of Objection: Material Loss of Residential Amenity, Failure

to Meet Noise Policy Standards, Failure to address Safety and Security risk to residents, Failure of Visibility Splays, Severe Highway Hazard, Inadequate Site Management and Misleading Pre-Application Consultation

Dear Planning Officer,

I am writing to formally object to the proposed development and permanent car park reconfiguration at The College of Richard Collyer. The applicant's proposal to permanently relocate active parking bays to within 4.8 metres of my residential boundary will result in an unacceptable, lifelong loss of residential amenity through unmitigated noise pollution, light glare and loss of privacy. Turning the existing 'exit-only' gate into a dual-direction 'entry and exit' junction presents a danger to highway safety. The applicant's submitted Car Park Management Plan is wholly deficient as it fails to outline any locking or security mechanisms for weekends, during which the gates currently remain completely unlocked. As such the applicant has failed to demonstrate that this permanent development protects neighbouring residents, directly conflicting with the National Planning Policy Framework (NPPF) 'Agent of Change' principle.

Material loss of residential amenity and Failure to Meet Noise Policy Standards

1. Intentional Dilution of Peak Noise and Significant Adverse Impact

The Noise Emissions Report prepared by BDP is fundamentally flawed, technically non-compliant, and contains severe factual errors regarding Horsham District Council's adopted local policies. The applicant has manipulated acoustic metrics to intentionally mask a Significant Adverse Impact on my residential amenity.

When correct British Standards and local policies are applied, the proposed car park results in an exceedance of +12 dB over my existing background noise level-a clear breach of planning thresholds that warrants immediate refusal.

2. Factual Error: Failure to Recognize Horsham Planning Policy

The applicant's report explicitly states:
"There is no identified planning noise guidance in the local planning authority's publications. BDP have therefore assessed against the applicable good practice design documents."

This statement is entirely false. Horsham District Council explicitly publishes, adopts, and enforces the Planning Noise Advice Document (East and West Sussex).

By falsely claiming no local policy exists, the applicant has bypassed Horsham's localised validation frameworks in order to

use broad, irrelevant global metrics that favour their development.

3. The "Apples and Pears" Deception (Average vs. Peak Noise)

The report relies on a "predicted ambient equivalent of 49 dB LAeq60" to claim compliance with generic World Health Organization (WHO) community noise guidelines.

This constitutes a severe methodological misrepresentation:

- The Average LAeq: A car park is characteristically irregular. By using a time-averaged logarithmic metric LAeq, the applicant has spread the noise of sudden, high-energy events flat across an extended timeframe. This mathematically dilutes the real-world impact.
- The Hidden Peak Spikes LAFmax: The physical disruption to an outdoor residential garden space consists of instantaneous, explosive peaks. Individual car doors slamming, boots dropping, and engines igniting at my boundary fence line will easily register peak spikes of 70 dB to 75 dB LAFmax.
- The Impact: Presenting a smooth "49 dB average" is an intentional tactic to mask repetitive 75 dB spikes that will regularly puncture and shatter my existing quiet background environment.

4. Methodological Contradiction and Bypassing of BS 4142

The applicant's report establishes my baseline acoustic environment as a "Typical Background Noise of 46 dB A90, 15min."

The choice of a 15-minute measurement window is highly specific and is taken directly from the framework of British Standard BS 4142 (Methods for rating and assessing industrial and commercial sound).

The applicant has committed a major internal contradiction by using BS 4142 to establish my background noise, but then completely abandoning BS 4142 when calculating the car park's emissions. They cannot selectively use a British Standard for baseline data while refusing to follow its mandatory penalty framework for the noise source itself.

5. Omission of Mandatory BS 4142 Acoustic Character Penalties

Because a college car park is an institutional/commercial facility, vehicles operating within its permitted boundary must legally be assessed under BS 4142. Human ears are highly sensitive to irritating, irregular sounds, meaning raw computer data must be adjusted using subjective character corrections.

The applicant's "49 dB" figure is a raw, unadjusted simulation output from CadnaA software.

A legally compliant assessment requires the calculation of a Rating Level $L_{A,r,T,r}$ by adding cumulative character penalties:

- Impulsivity Correction (+3 dB): To account for the sharp, sudden impacts of car doors slamming and boots closing.

- Intermittency Correction (+3 dB): To account for the concentrated surge spikes of student and staff traffic switching rapidly on and off during peak college operational hours.

- Other Distinctive Character (+3 dB): To account for non-standard institutional noise sources, such as a college campus environment that stand out against a residential backdrop [BS 4142]. These include artificial electronic low-speed hums from modern Electric Vehicles (AVAS), repetitive high-frequency car alarm locking chirps, low-frequency bass vibration from vehicle infotainment systems, raised pedestrian voices/student congregation, and the mechanical impacts of security barriers or speed bumps.

6. The Real Impact: Exceeding the Significant Adverse Threshold

When the mandatory, cumulative BS 4142 character corrections are applied to the raw computer prediction, the true acoustic impact is revealed:

Raw Prediction (49 dB) + Cumulative Penalties (9 dB) = 58 dB
Rating Level

Comparing the legally compliant 58 dB Rating Level against my documented 46 dB Background Noise Level results in a relative exceedance of +12 dB.

Under BS 4142 and Horsham's adopted Sussex Planning Noise Advice Document:

- An exceedance of +5 dB indicates an Adverse Impact.
- An exceedance of +10 dB or more is the formal definition of a Significant Observed Adverse Effect Level (SOAEL) / Significant Adverse Impact.

National planning policy (NPPF) dictates that any development proven to introduce a Significant Adverse Impact must be avoided and refused by the local authority.

The WHO's earlier Community Noise Guidelines (1999) give the clearest explicit outdoor limit:

"To avoid serious annoyance during the daytime, outdoor sound levels should not exceed 55 dB L_{Aeq} ."

"To avoid moderate annoyance, outdoor sound levels should not exceed 50 dB LAeq."

7. Misplacement of unattended continuous logger

According to the emission report, "An unattended continuous logger was also installed to collect noise levels considered to be representative of the nearest noise sensitive receptors, identified as the residents along Hurst Avenue." That is factually incorrect.

According to the illustration provided in the report, this was actually taken nearer the road and 100-200m away from the residents along Hurst Avenue (and where the attendee loggers were placed). The ambient sound levels that have then been averaged and stated are not reflective of the nearest noise sensitive receptors.

8. Formal Requests and Mitigation Measures

Based on the extensive technical deficiencies, misapplication of metrics, and factual errors regarding local Horsham policy, I request that the Planning Committee take the following actions:

1. Refuse or Defer the Application: Reject the noise report in its current state and demand that the applicant resubmit a fully compliant, independent BS 4142 assessment that calculates true Rating Levels. Ensure loggers are placed at nearest noise sensitive receptors.

2. Scrutinise Software Inputs: Compel the applicant to disclose the exact input configurations for their CadnaA software model- specifically verifying that ground absorption was set to hard ground ($G=0$) for the tarmac surface and that facade reflections from new buildings were calculated.

3. Mandate Strict Boundary Conditions: If the council is minded to grant approval despite this severe impact, it must be strictly conditioned that the developer installs a certified, high-mass acoustic barrier (minimum 2.1m height, solid with no gaps, minimum surface density of 25kg/m^2) along my exact boundary line, backed by a dense landscaped green buffer zone to absorb low-frequency engine vibrations.

Security, Safety and Antisocial Behaviour relating to the positioning of Proposed New Car Park

The application, and Car Park Management System does not state the car parked will be closed/gates locked outside of college hours for example (at night times -10pm-7am- and weekends) or include any provision for management, supervision, or security during night time hours or weekends.

Without closure, or active management outside college hours, the car park is likely to become a hotspot for unauthorised parking, loitering, and misuse. This is a particular concern given its planned close proximity to our boundary line. There is also the risk of criminal activity, with vehicles being able to easily drive in and up the back of properties and out again, increasing the risk of break ins, particularly to outside buildings.

The absence of a clear management plan fails to meet the standards expected for developments adjoining residential properties, and increases the risk of anti social behaviour, especially at night.

The proposal does not include adequate lighting, CCTV, or security measures to protect residents or deter misuse. This represents a material risk to safety and wellbeing.

Safety and Security concerns were raised across nearly all engagement sessions (as stated in the Community Involvement Document) however, despite this, these concerns have not been addressed, particularly as the Car Park Management Plan only relates to use within college hours.

Formal Requests and Mitigation Measures

- Guarantee that the car park will be closed and locked at night times -10pm-7am- and weekends,

OR:

- Out of hours supervision

- Security measures (CCTV, lighting, patrols)

- Clear enforcement mechanisms

Without these, the proposal is incomplete and does not adequately address the foreseeable impacts.

Failure of Visibility Splays and Severe Highway Hazard

1. Absolute Failure of the Required Visibility Splay

To safely change the current exit only gate into a permanent, two-way entry and exit, the applicant must legally maintain an unobstructed visibility splay. The applicant's drawings show a theoretical, empty sightline triangle. However, this completely ignores the established, real-world behaviour of the site.

This specific exit point is a primary congregation and social gathering zone for students. I understand the new plaza area is intended to give students a more welcoming convening space, but the reality is that as long as the college maintains a no

smoking/vaping policy, the students will continue to use the nearest location off premises (despite this being against their student contract behaviours, this is not currently enforced).

Because crowds of stationary pedestrians routinely pack this exact threshold during morning, lunch, and afternoon intervals, the critical visibility sightlines will be continuously and heavily obscured. Exiting vehicles will be forced to 'blind-nose' forward, creating a severe and unacceptable highway hazard.

2. Extreme Risk to Vulnerable Road Users and New Cycle Lane

Because exiting drivers will have their visibility splayed blocked by student crowds, they will be forced to push forward blindly, cutting directly across the newly installed public cycle lane on this busy railway station feeder road.

3. Formal Requests and Mitigation Measures

1. Creation of vaping/smoking area within Collyers site. I understand that this is currently against the Collyers code of conduct but consideration should be given to real world behaviours and the primary safety of entry and exit to the college for pedestrians, vehicles and cyclists. Whilst a new plaza may make it a more attractive place to gather, that is not the driver that currently encourages them to gather by this exit.

Inadequate Site Management

1. Failure to conform to Equality Act 2010 and BS8300 in provision of Blue Badge spaces

The car park plans currently indicate only a retained three Blue Badge spaces. It seems the college is failing to use the opportunity to conform to the Equality Act 2010 and address their clear failure to meet BS8300 in providing the required number of Blue Badge spaces for disabled users.

2. Opening Hours are relevant to this proposal

The application form submitted stated "No" to the question of if the hours of opening are relevant to this proposal. This is fundamentally incorrect. The hours of operation of the new building and car park are vital for residents to be able to fully understand and comment on the impact on their amenity. The timings included in the car park management plan are vague at best and there is no mention of weekends when the gates are currently left open.

3. Deficient Car Park Management Plan

Inadequate attention is given to noise, light, security, loss of

privacy and antisocial behaviour. The applicant's Car Park Management Plan ignores that the parking gates currently remain completely unlocked and unmonitored on weekends. Because this site directly feeds Horsham railway station and nearby leisure assets, an open, unmanaged vehicle facility can attract public overspill parking and anti-social behavioural loitering during weekend periods of residential rest.

This may also invalidate BDP's acoustic modelling, which was calculated strictly on controlled, structured educational usage.

Formal Requests and Mitigation Measures

1. Please redesign the car park spaces to meet or exceed the required standard to enable disabled students and staff the opportunity to access the site.
2. Clearly state the full intended opening hours on the application.
3. Defer the application pending an update of the deficient car park management plan to explain how noise, light, security, loss of privacy and antisocial behaviour will be addressed within the stated opening hours. Allowing residents to assess and comment on the updated version.

Misleading Pre-Application Consultation and Encroachment, Potentially Invalidating Supporting Documents

1. Material change in proposal

The applicant's informal consultation presented a layout showing the car park at a 7 m distance from the boundary. However, the submitted plans reduce this to 4.8 m - a material change that significantly increases noise, headlight intrusion, and activity adjacent to residential gardens.

Residents were not consulted on this version, meaning the informal engagement was misleading and did not reflect the actual proposal. This undermines the fairness of the consultation process and prejudices neighbours' ability to provide informed comments.

Many of the supporting documents are based on the 7 m buffer zone. The discrepancy between the 7m plan shown to residents and the 4.8 m plan submitted does not align with RTPI principles of transparent and accurate engagement.

Furthermore, if BDP calculated their Noise Impact Assessment using the original 7-metre layout, the predicted decibel levels at the boundary are mathematically understated, unverified, and invalid.

This also impacts the arboricultural impact assessment which according to their own illustrations were based on the 7m buffer zone.

This also impacts the lighting assertions in the Design and Access Statement. Whilst back shields are included for the row of car park lights nearest the properties, there are a row of lights facing toward the properties on the Western side of the new layout. These will directly face the residents without any mitigation offered.

Formal Requests and Mitigation Measures

1. Formal clarity on the distance between the boundary and the new car park.
 2. Clarity what assumption was used for modelling the BDP noise emission survey and updated modelling and report if necessary.
 3. Revised arboricultural impact assessment based on the revised buffer zone.
 4. Revised assertions in the design and access statement on lighting.
 5. Presence detection on lighting to be mandated as a planning condition.
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Kind regards

Telephone:

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