



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DC/23/0406
LOCATION:	Land To The West of Ashington C of E School, Park Lane, Ashington, West Sussex
DESCRIPTION:	Demolition of existing buildings and erection of 180 dwellings, sports pavilion, sport pitches and allotments; with associated access, landscaping, open space and infrastructure.
RECOMMENDATION:	Objection
SUMMARY OF COMMENTS & RECOMMENDATION: Comments relating to below documents: Ardent Consulting Engineers Noise Assessment dated February 2023 Ardent Consulting Engineers Air Quality Assessment dated February 2023 RSK Environment Ltd Phase 1 and Phase 2 Geo-environmental Factual and Interpretive Report dated January 2021 Quantum CE Water Neutrality & Offsetting Report, dated 3 February 2023 Application is currently insufficiently detailed to be determined.	

MAIN COMMENTS:

Noise

We have reviewed the Ardent Consulting Engineers Noise Assessment, dated February 2023, and we have the following comments to make.

1. We note that the proposals include a Multi-Use Games Area (MUGA) and Sports Pitch it is not clear however whether the sports pitch and the MUGA will be all weather – we would be grateful if this can be clarified.
2. We note the comments in section 5 of the report that the MUGA and sports pitch would be beneficial to proposed development and that there is no guidance for the assessment of noise from these facilities. The facility may well be of benefit to the proposed development, and we appreciate that there is no formal guidance for assessing the impact from facilities of this nature, in our view section 5 is however insufficiently detailed and a more robust noise assessment is required.
3. The above-mentioned further assessment should include the impact on residential amenity from noise typically associated with facilities of this nature such as impact noise, raised voices, whistles etc and take into the account the likely extended use into the evening of the MUGA, and possibly the sports pitch too, and the low background noise levels.

Contaminated Land

We have reviewed RSK Environment Limited Phase 1 and Phase 2 Geo-environmental Factual and Interpretive Report, dated January 2021, and we have the following comments to make.

1. We are satisfied with the Phase 1 Preliminary Assessment element of the report and with the Phase II site investigation works that have been undertaken to date.
2. We note the conclusions that further investigations are required in the vicinity of TP2 and WS1 to fully characterise the made ground in this part of the site and we are in support of this recommendation.
3. From reviewing the ground gas data we note that carbon dioxide concentrations up to 6.5%v/v were detected in WS01 during the monitoring in December 2021. From reviewing the log for this location we note that the response zone for this borehole straddled the natural and the made ground – the source of the elevated carbon dioxide concentrations at this location is therefore not clear. From reviewing the log for TP02, located in close proximity to WS01, the made ground was not proven at this location and it is also noted that all of the wells were flooded during the second and third monitoring visits both of which is also a concern. In addition to the recommendations in the report further assessment of the risks from ground gases are also required in this part of the site, including the proving of the made ground.
4. If the applicant would like to undertake the additional investigations prior to determination we would welcome this, we are however happy to request the additional information through conditions and we will therefore be recommending suitable conditions, once we are happy with the above-mentioned noise assessment and our current objection has been removed.

Proposed Water Harvesting/Greywater Recycling Schemes

Environmental Health have reviewed the Quantum CE Water Neutrality & Offsetting Report, dated 3 February 2023, and we have the following comments to make

1. We note the proposals include the use of rainwater harvesting and greywater recycling schemes to supply the proposed development with non-potable water. Water harvesting schemes of this nature can be highly contaminated and, with this in mind, our interpretation of the technical guidance from the Drinking Water

Inspectorate (DWI) is that should water from a rainwater harvesting system or greywater recycling scheme be used for non-potable uses then it should still be subject to appropriate treatment and testing.

2. Given the above and the scale of the development the applicant needs to provide the LPA with confidence prior to determination that they understand the risks associated with the proposed water systems, what treatment and maintenance is required so that water sourced from either system will not present a risk to health and, crucially, an understanding of the private water supply regulations which will dictate the frequency of any testing and what will need to be tested for. Unfortunately the above-mentioned document does not contain this information or the level of detail that we require – this can only be achieved by way of a detailed private water supply maintenance and management plan provided by a suitably competent and qualified consultant who specialises in private water supplies.

Air Quality

We have reviewed the Ardent Consulting Engineers Air Quality Assessment, dated February 2023, and we have the following comments to make.

Receptors:

1. We have been unable to find the results for Ashington C of E First School assessment. The school is also missing as an existing receptor in the methodology chapter Table 3-1 and Figure 3-1.
2. The school should be included in the model due to its proximity to the development and to its sensitivity to emissions, otherwise please add a paragraph in the report explaining why the school was not included in the assessment.

Monitoring:

1. Major applications should consider supplementing local authority monitoring with own monitoring - which would help to increase model certainty and confidence in the results.
2. Monitoring should be considered on the Construction Mitigation Plan. As monitoring forms a vital part of construction, given the scale of the propose development, the likely high number of road traffic movements generated during the construction phase a monitoring plan should be included as a measure.
3. We request a real-time PM10 continuous monitoring and deposition gauges.

Damage costs:

1. Please send a list of proposed mitigations measures.

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.

ANY RECOMMENDED CONDITIONS:

N/A

NAME:

Kevin Beer

DEPARTMENT:	Environmental Health and Licensing
DATE:	13/06/2023