

**From:** planninginfo@midsussex.gov.uk <planninginfo@midsussex.gov.uk>  
**Sent:** 20 February 2025 15:32:28 UTC+00:00  
**To:** "planninginfo" <planninginfo@midsussex.gov.uk>  
**Subject:** Mid Sussex DC - Online Register - Consultee Comments for Planning Application  
DM/25/0388

## Consultee comments

Dear Sir/Madam,

A consultee has commented on a Planning Application. A summary of the comments is provided below.

Comments were submitted at 20/02/2025 3:32 PM from Mr Nick Bennett on behalf of Environmental Protection.

### Application Summary

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| Reference:    | DM/25/0388   |
| Address:      | Central Sussex College Queensmere House 49 Queens Road<br>East Grinstead West Sussex RH19 1BG  |
| Proposal:     | Conversion of a D1 Educational Building to 24no. Residential Apartments (32 Bedrooms) with infilling of existing undercroft areas, associated car parking, landscaping, cycle spaces, amenity areas, 1.1m high metal fence and new ramp. |
| Case Officer: | Andrew Watt  |

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### Comments Details

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| Comments: | <p>The proposed development is for residential premises in a town centre location. The measured noise levels means that with the proposed design/layout, in order to avoid adverse noise impacts, most windows in the development will need to be kept closed, both day and night, according to the acoustic report.</p> <p>The National Planning Policy Framework encourages improved standards of design, and ProPG: Planning and Noise was published in May 2017 in order to encourage better acoustic design for new residential schemes in order to protect future residents from the harmful effects of noise.</p> <p>It is our view that Good Acoustic Design, as advocated within National Policy, includes ventilation and an overheating</p> |
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assessment and should be a fundamental consideration in the design of schemes. Closed window solutions should be considered only as a last resort, and, as specified in the Planning Noise Advice Document for Sussex (PNADS) sections 2.3.4 and 2.3.5, should incorporate an appropriate overheating assessment (ie conducted in accordance with Acoustics Ventilation and Overheating (AVO) Residential Design Guide (January 2020) and / or CIBSE's Design Methodology for the Assessment of Overheating Risk in Homes TM59: 2017). The acoustic report relies on compliance with Approved Document O (ADO) to provide suitable ventilation, but in our view this is not sufficient as ADO relates only to bedrooms at night.

In a recent (Nov 23) Appeal Decision where noise was one of the relevant issues, the Inspector made the following comments (APP/C3810/W/23/3318827):

It is reasonable that future residents of the development would expect to be able to open their windows, particularly in fine weather. Being able to open windows (and patio doors) in a dwelling is an essential part of everyday life, and something which most people take for granted. Forcing future residents to make a choice between opening windows and tolerating road noise at the levels identified in the Appellant's noise evidence would create an oppressive living environment, inconsistent with the principles of good design.

The development referred to was adjacent to the A27, but the principle that the Inspector refers to is clear – occupiers should not have to choose between fresh air and a noise environment within safe levels.

On this basis, we request a suitable overheating assessment is submitted.

Additionally we request that an air quality damage cost calculation and mitigation scheme be submitted as per Air quality and emissions mitigation guidance for Sussex (2021)

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Kind regards