



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land West of Bines Road Bines Road Partridge Green
DESCRIPTION:	Development of 101 dwellings (including 45% affordable), creation of new access, public open space, creation of a cycle path, allotments, and associated landscaping.
REFERENCE:	DC/25/1922
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: We have reviewed the Phlorum Ltd. Air Quality Assessment dated 03 October 2024 and we have the following comments to make.	

MAIN COMMENTS:

PM2.5 targets

An Interim Planning Guidance on the consideration of the Environmental Act PM2.5 target in planning decisions was published in October 2024. Applicants are advised to provide evidence in their planning applications that they have identified key sources of air pollution within their schemes and taken appropriate action to minimise emissions of PM2.5 and its precursors as far as is reasonably practicable.

1. How has exposure to PM2.5 been considered when selecting the development site? Applicants are advised to consider the following in their application:
 - Site proximity to people (particularly large populations and/or vulnerable groups, e.g. schools, hospitals, care homes, areas of deprivation) and the impact of the development on these,
 - Site proximity to pollution sources and the impact of these on users of the development,
 - Exposure and emissions during both construction and in-use.
2. What actions and/or mitigations have been considered to reduce PM2.5 exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of PM2.5 and its precursors? Applicants are advised to explain (with evidence where possible) why each measure was implemented. Or, if no mitigation measures have been implemented, why this was not proposed. Actions can refer to, but are not limited to, the following:
 - Site layout,
 - The development's design,
 - Technology used in the construction or installed for use in the development,
 - Construction and future use of the development

Damage Cost Calculation

It is recommended that the damage cost calculation be updated to reflect the 2026–2030 EFT factors and associated prices. However, we recognize that this update may not be strictly necessary, as the use of the Road Transport Urban Medium and Urban (not London) categories in the EFT is considered a conservative approach, which may help offset any differences in calculated emissions.

It is noted that the AADT value used to calculate the damage cost (457 vehicles/day) is lower than the 574 vehicle trips generated over a 12-hour period as reported in the Travel Plan and Highways Transport Assessment. Further clarification is requested to explain the reason for this difference.

Mitigation

Some of the proposed mitigation measures are policy-related and the *Sussex-Air's Air Quality and Emissions Mitigation Guidance (2021)* aims to avoid duplication of measures that would normally be required through other regimes. As the Approved Document S is now in force, we would not recommend including charging points in the mitigation plan unless those were offsite, to support the EV Charging Network and Delivery Plans for the local area. Similarly, we would not support cycle parking and shelters as this is already an expectation of the LTP/HDC cycling strategies and related policies. Instead, we would highly recommend improvements to existing cycling paths, and including cycle paths that meet up with current paths in the development design.

ANY RECOMMENDED CONDITIONS:**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 dust management plan is recommended as a condition:

Condition: Prior to the commencement of the development, including construction and preparatory works, a Dust Management Plan shall be submitted to and approved in writing by the Local Planning Authority. Dust mitigation measures should draw upon the best practice mitigation measures recommended in the Site Specific Mitigation section and Appendix A of the Air Quality Assessment.

Reason: As this matter is fundamental in order to consider the potential impacts on the amenity of nearby occupiers during construction and in accordance with Policy 33 of the Horsham District Planning Framework (2015).

NAME:	Thais Delboni
DEPARTMENT:	Environmental Health
DATE:	16 th December 2025