



Horsham  
District  
Council

## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Horsham District Council – Planning Dept
<b>LOCATION:</b>	Former Novartis Site Parsonage Road Horsham West Sussex RH12 5AA
<b>DESCRIPTION:</b>	Residential development comprising approximately 206 dwellings, including the conversion of 'Building 3' and demolition of 'Building 36'. Vehicular access taken from Wimblehurst Road. Car and cycle parking, landscaping and open space and associated works. The replacement of the existing cedar trees at the site.
<b>REFERENCE:</b>	DC/25/0629
<b>RECOMMENDATION:</b>	More Information / Modification

### SUMMARY OF COMMENTS & RECOMMENDATION:

We have reviewed the October 2025 Air Quality Assessment, document reference 2509761\_03, and Technical Note (August 2025) have the following comments to make.

### MAIN COMMENTS:

#### Damage Cost Calculation

The EFT emissions calculations appear to be incorrect and are underestimating the emissions associated with the development. The EFT should include values for the period 2027-2031.

For clarity, I have provided a screenshot showing the values for 2027.

Primary Inputs		Pollutants		Selected		Standard Outputs		Selected		Additional Outputs		Selected		Advanced Options		Selected		Click the button to:	
Area	England (not London)	NO <sub>x</sub>	Y	Air Quality Modelling (g/km/s)		Breakdown by Vehicle		Bespoke Base Fleets											Run EFT
Year	2027	PM <sub>10</sub>		Emissions Rates (g/km)		Source Apportionment		Bespoke Euro Fleet											Clear Input Data
Traffic Format	Basic Split	PM <sub>2.5</sub>	Y	Annual Link Emissions		PM by Source		Fleet Projection Tool											
All must be selected		CO <sub>2</sub>		Annual Link Emissions		Primary NO <sub>x</sub> Fraction		Export Outputs		Primary NO <sub>x</sub> Fraction		Export Outputs		Primary NO <sub>x</sub> Fraction		Primary NO <sub>x</sub> Fraction			
SourceID	Road Type	Traffic Flow	% HDV	Speed(kph)	No of Hours	Link Length (km)	% Gradient	Flow Direction	% Load										
DC/25/0629	Urban (not London)	1125	2	50	24	10													
A	B	C		D															
1	Source Name	Pollutant Name	All Vehicles (Annual Emissions (kg/yr except CO <sub>2</sub> tonnes/yr))	All LDVs (Annual Emissions (kg/yr except CO <sub>2</sub> tonnes/yr))	All HDVs (Annual Emissions (kg/yr except CO <sub>2</sub> tonnes/yr))														
2	DC/25/0629	NO <sub>x</sub>		585.40746		550.42750		34.97996											
3	DC/25/0629	PM <sub>2.5</sub>		75.32217		70.01026		5.31191											

The annual emission figures calculated for each year should then be entered into the Damage Cost Toolkit:

- Start year = 2027 (opening year)
- End year = 2031

- Price base year = 2025 (baseline year for the project appraisal)

### **Air Quality Mitigation Plan**

The proposed provision of vouchers for alternatives to private car use would not be acceptable as mitigation as we cannot enforce the new residents to use them, and it does not mitigate the impacts of the development in the medium/long term. Alternative schemes we would support include:

- i. HDC Local Cycling and Walking Infrastructure Plan
- ii. Improvements to existing cycling paths, and including cycle paths that meet up with current paths in the development design.
- iii. Offsite provision of EV charging points to support the EV Charging Network and Delivery Plans for the local area.
- iv. Support the delivery of WSCC Bus Service Improvement Plan
- v. Other measures included in the Air Quality Action Plan and Annual Status Report

### **Modelling**

Thank you for the clarification, please also provide full statistical analyses to give full picture of the model performance, including (but not limited to):

- The correlation coefficient
- Fractional bias
- Root Mean Square Error (RMSE)

The statistical analyses should also include model performance for PM10 and PM2.5.

### **ANY RECOMMENDED CONDITIONS:**

**Pre-Commencement Condition:** Prior to the commencement of the development, a Construction and Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. During site clearance, preparation and construction the Construction Mitigation measures described in Section 9 of the Air Quality Assessment report (RWDI, April 2025) shall be adopted. The CEMP shall include details of the following relevant measures:

- i. An introduction consisting of construction phase environmental management plan, definitions and abbreviations and project description and location
- ii. A description of management responsibilities
- iii. A description of the construction programme which identifies activities likely to cause high levels of noise or dust
- iv. Site working hours and a named person for residents to contact
- v. Detailed Site logistics arrangements
- vi. Details regarding parking, deliveries, and storage
- vii. Details regarding dust and noise mitigation measures to be deployed including identification of sensitive receptors and ongoing monitoring
- viii. Details of the hours of works and other measures to mitigate the impact of construction on the amenity of the area and safety of the highway network; and
- ix. Communication procedures with the LBL and local community regarding key construction issues – newsletters, fliers etc
- x. Details of traffic construction routing to and from the site The construction shall thereafter be carried out in accordance with the details and measures approved in the CEMP for the related phase

**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).

**Pre-Commencement Condition:** Prior to the commencement of the development, a detailed Air Quality Assessment and Mitigation Strategy shall be submitted to and approved in writing by the Local Planning Authority. The assessment and strategy shall be written in accordance with the Sussex Air (2021) Air Quality and Emissions Mitigation Guidance for Sussex and shall detail the calculated damage costs that will be spent on practical mitigation measures. The approved detail within the strategy shall thereafter be strictly adhered to unless otherwise agreed to and approved in writing by the Local Planning Authority.

**Reason:** To mitigate the impact of the development on air quality within the District and to sustain compliance with and contribute towards national objectives for pollutants in accordance with Policies 24 & 41 of the Horsham District Planning Framework (2015).

<b>NAME:</b>	Thais Delboni
<b>DEPARTMENT:</b>	Environmental Health
<b>DATE:</b>	16 December 2025