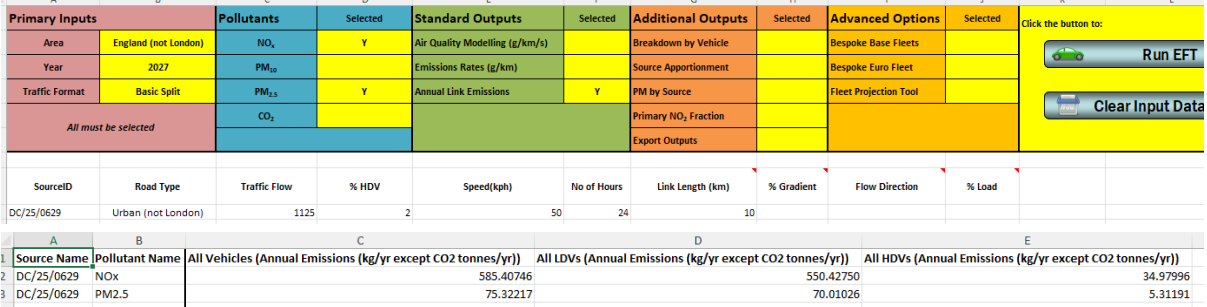




Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept																																			
LOCATION:	Former Novartis Site Parsonage Road Horsham West Sussex RH12 5AA																																			
DESCRIPTION:	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.																																			
REFERENCE:	DC/25/0629																																			
RECOMMENDATION:	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: <u>Damage Cost Calculation</u> 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.																																				
 <p>The screenshot displays the Damage Cost Calculation tool interface. It includes a 'Primary Inputs' section with fields for Area (England (not London)), Year (2027), and Traffic Format (Basic Split). The 'Pollutants' section shows NO_x, PM₁₀, and PM_{2.5} with a 'Selected' checkbox for each. The 'Standard Outputs' section shows Air Quality Modelling (g/km/s), Emissions Rates (g/km), and Annual Link Emissions. The 'Additional Outputs' section shows Breakdown by Vehicle, Source Apportionment, PM by Source, Primary NO₂ Fraction, and Export Outputs. The 'Advanced Options' section shows Bespoke Base Fleets, Bespoke Euro Fleet, and Fleet Projection Tool. A 'Click the button to:' section contains 'Run EFT' and 'Clear Input Data' buttons. Below the inputs, a table shows the following data for SourceID DC/25/0629:</p> <table border="1"><thead><tr><th>SourceID</th><th>Road Type</th><th>Traffic Flow</th><th>% HDV</th><th>Speed(kph)</th><th>No of Hours</th><th>Link Length (km)</th><th>% Gradient</th><th>Flow Direction</th><th>% Load</th></tr></thead><tbody><tr><td>DC/25/0629</td><td>Urban (not London)</td><td>1125</td><td>2</td><td>50</td><td>24</td><td>10</td><td></td><td></td><td></td></tr></tbody></table> <p>The bottom section of the screenshot shows a table with the following data:</p> <table border="1"><thead><tr><th>Source Name</th><th>Pollutant Name</th><th>All Vehicles (Annual Emissions (kg/yr except CO2 tonnes/yr))</th><th>All LDVs (Annual Emissions (kg/yr except CO2 tonnes/yr))</th><th>All HDVs (Annual Emissions (kg/yr except CO2 tonnes/yr))</th></tr></thead><tbody><tr><td>DC/25/0629</td><td>NOx</td><td>585.40746</td><td>550.42750</td><td>34.97996</td></tr><tr><td>DC/25/0629</td><td>PM2.5</td><td>75.32217</td><td>70.01026</td><td>5.31191</td></tr></tbody></table>		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				Source Name	Pollutant Name	All Vehicles (Annual Emissions (kg/yr except CO2 tonnes/yr))	All LDVs (Annual Emissions (kg/yr except CO2 tonnes/yr))	All HDVs (Annual Emissions (kg/yr except CO2 tonnes/yr))	DC/25/0629	NOx	585.40746	550.42750	34.97996	DC/25/0629	PM2.5	75.32217	70.01026	5.31191
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The annual emission figures calculated for each year should then be entered into the Damage Cost Toolkit: <ul style="list-style-type: none">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:

- HDC Local Cycling and Walking Infrastructure Plan
- Improvements to existing cycling paths, and including cycle paths that meet up with current paths in the development design.
- Offsite provision of EV charging points to support the EV Charging Network and Delivery Plans for the local area.
- Support the delivery of WSCC Bus Service Improvement Plan
- 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:

- An introduction consisting of construction phase environmental management plan, definitions and abbreviations and project description and location
- A description of management responsibilities
- A description of the construction programme which identifies activities likely to cause high levels of noise or dust
- Site working hours and a named person for residents to contact
- Detailed Site logistics arrangements
- Details regarding parking, deliveries, and storage
- Details regarding dust and noise mitigation measures to be deployed including identification of sensitive receptors and ongoing monitoring
- 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
- Communication procedures with the LBL and local community regarding key construction issues – newsletters, fliers etc
- 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).

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