



## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Horsham District Council – Planning Dept
<b>FROM:</b>	Environmental Health and Licensing
<b>REFERENCE:</b>	DC/25/0523
<b>LOCATION:</b>	Land north of East Street, Ruper
<b>DESCRIPTION:</b>	Erection of 18no. 2, 3 and 4 bedroom dwellings, (including 6no. affordable housing units), together with access from East Street, vehicle and cycle parking, landscaping and open space, and sustainable drainage.
<b>RECOMMENDATION:</b>	More information
<b>SUMMARY OF COMMENTS &amp; RECOMMENDATION:</b> Comments relating to below information: Response to Comments on Air Quality Assessment for Land north of East Street, Ruper from Horsham District Council	

**MAIN COMMENTS:**

Environmental Health have reviewed the above-mentioned report, and we have the following comments to make.

**Air Quality****Emission Mitigation Assessment**

The EFT and damage cost calculations appear to be inaccurate. The EFT should generate results for each of the first five years of the site being operational, and these annual figures should then be entered into the Damage Cost Toolkit (Excel spreadsheet available via the Gov.uk website referenced in your report).

Using the information provided in the Air Quality Assessment, I carried out these calculations and arrived at a higher total cost. Please could you review your figures using the above methodology, and include a detailed breakdown of your workings as supporting evidence?

For clarity, these are the figures I used for the Damage Cost toolkit:

- Start year = 2027
- End year = 2031
- Price base year = 2025 (baseline year for the project appraisal)

A financial contribution may be accepted as mitigation, provided it matches the updated damage cost calculation. If the applicant prefers to implement alternative mitigation measures instead of making a financial contribution, they must submit itemised costings for each proposed measure.

All mitigation measures for the proposed development must align with the *Sussex Air Quality and Emissions Mitigation Guidance for Sussex (2021)*. The Sussex Air guidance seeks to prevent duplication of measures that are already required under other regulatory frameworks (e.g. West Sussex County Council (WSCC) parking guidance). One potential duplication identified was the formation of a new pedestrian footway, please could you provide further clarification on how this goes beyond what is required already.

The emissions mitigation statement should include itemised costs for each proposed option, along with the total cost of all mitigation measures. This total must be equal to the calculated emissions damage cost based on the emissions assessment.

We note that Air source heat pumps (ASHPs) will be provided within each dwelling to reduce emissions from the development. If incorrectly sited ASHPs can however cause issues with noise, we would be grateful therefore if the applicant can provide a plan showing the proposed locations of the ASHPs on each dwelling.

**ANY RECOMMENDED CONDITIONS:**

**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 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).

<b>NAME:</b>	Isabelle Carter
<b>DEPARTMENT:</b>	Environmental Health and Licensing
<b>DATE:</b>	24/04/2025