



HORSHAM DISTRICT COUNCIL CONSULTATION

| | |
|---|---|
| TO: | Development Control |
| FROM: | Environmental Health and Licensing |
| REFERENCE: | DC/25/1155 |
| LOCATION: | Land East of Tilletts Lane Warnham |
| DESCRIPTION: | Erection of 59 dwellings with associated open space, landscaping, parking, access, and drainage infrastructure. |
| RECOMMENDATION: | More Information |
| SUMMARY OF COMMENTS & RECOMMENDATION: | |
| Comments relating to below information: Michael Bull and Associates Air Quality Assessment dated June 2025 | |

MAIN COMMENTS:

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

Land Contamination

Taking into account the proposed residential use of the site, a land use that is sensitive to the presence of contamination, to ensure the site is suitable for residential development the application should be supported by a preliminary contamination risk assessment (PCRA), undertaken by a suitably competent and experienced environmental consultant. We note however that a report of this nature has not been provided.

Air Quality

The damage cost calculations appear to be inaccurate. The results from the EFT are correct, but the damage cost calculation appears to be slightly lower than expected. The EFT generates 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 the Air Quality Assessment).

Using the information provided in the Air Quality Assessment, I carried out these calculations and arrived at a higher total cost. When completing the damage-cost calculation, the price base year should be 2025, rather than 2022, as this is the year of appraisal. Please could you review your figures using the above methodology and submit a new damage-cost, including a breakdown of your workings as supporting evidence?

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

- Start year = 2026
- End year = 2030
- Price base year = 2025 (baseline year for the project appraisal)

You have calculated the total damage cost over 5 years but you have not outlined the mitigation strategies that will be implemented. Please include an additional emission mitigation statement.

Sussex Air (2021) Air Quality and Emissions Mitigation Guidance for Sussex takes a low-emission strategies' approach to avoid health impacts of cumulative development, by seeking to mitigate or offset emissions from the additional traffic and buildings. It is recommended that the emission mitigation statement contain itemised costing for each proposed mitigation option and total value of all proposed emissions' mitigation. This should be equal to the value from Emissions calculation and total calculated value of emissions' health damage cost. Sussex Air quality guidance aims to avoid the duplication of measures that would normally be required through other regimes. 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

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 construction environmental management (CEMP) plan will be recommended as a condition, once we are happy that the above matters have been addressed.

| | |
|--------------------|------------------------------------|
| NAME: | Georgina Hermitage |
| DEPARTMENT: | Environmental Health and Licensing |
| DATE: | 28/08/2025 |