



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land West of Ifield Charlwood Road Ifield
DESCRIPTION:	Hybrid planning application (part outline and part full planning application) for a phased, mixed use development comprising: A full element covering enabling infrastructure including the Crawley Western Multi-Modal Corridor (Phase 1, including access from Charlwood Road and crossing points) and access infrastructure to enable servicing and delivery of secondary school site and future development, including access to Rusper Road, supported by associated infrastructure, utilities and works, alongside: An outline element (with all matters reserved) including up to 3,000 residential homes (Class C2 and C3), commercial, business and service (Class E), general industrial (Class B2), storage or distribution (Class B8), hotel (Class C1), community and education facilities (Use Classes F1 and F2), gypsy and traveller pitches (sui generis), public open space with sports pitches, recreation, play and ancillary facilities, landscaping, water abstraction boreholes and associated infrastructure, utilities and works, including pedestrian and cycle routes and enabling demolition. This hybrid planning application is for a phased development intended to be capable of coming forward in distinct and separable phases and/or plots in a severable way.
REFERENCE:	DC/25/1312
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal

MAIN COMMENTS:

Air Quality Modelling

1. Harwood Road and North Street (B2195) are important major roads that provide access to the town centre, and although these are areas where effects are likely to be more significant in Horsham, they were not included in the model. Receptors in these roads should have been considered.
2. As the development is being built, other receptors will be created, these should be identified and considered in the modelled scenarios.
3. No short-term monitoring was implemented to improve model certainty, and only 3 diffusion tubes and all located in Crawley were used to verify the model. Given the size and complexity of the development and the different types of roads modelled, additional monitoring and separate adjustments should have been considered in order to avoid over or under-predicting at the different types of location. Care needs to be taken when applying model adjustment based just a few monitoring sites as the adjustment may not be representative of other locations.
4. Crawley and Horsham have PM data available that should have been used for modelled-road verification, road-NOx adjustment should be applied only when there is an absence of this data.
5. Clarification why a scenario for year 2035 was not modelled, as this is the year with peak combination of construction and operational traffic flows and potentially high impact of PM (from the construction).
6. Further clarification why AADT would be lower in the following years at *B2195 Crawley Rd, A264 to Forest Rd*. And AADT at *Forest Rd, e of Tower Rd* is 5 times higher after the completion of the development in comparison with the baseline. Is it realistic to expect the traffic to take this route?
7. Clarification regarding Scenarios 2 and 3. Within the text it is written as Do Minimum and Do Something 2029, but in tables 7.14, 7.15, and 7.16, it is written as 2026.

Damage Cost Calculation

8. The Sussex Air Guidance takes the precautionary approach, and the Damage Cost Calculation should include all transport movements from the proposed development as it is these emissions which are to be mitigated. It should not deduct any emissions from extant use (net trip generation). It computes the cost to society of the proposal's emission on its own merit.
9. 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.
Start year = 2041
End year = 2045
Price base year = 2025 (baseline year for the project appraisal)

Mitigation

10. We recognize that a number of potential mitigation measures described in the Sussex Air Air Quality Guidance are set out in the Draft Heads of Terms. The Guidance 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.

Construction

11. As the development is being built, other receptors will be created, these should be identified and considered in the construction dust management plan.
12. Given the size of the development and proximity to receptors, the Dust Management Plan should also include monitoring of dust deposition, dust flux, real time PM10 continuous monitoring and visual inspections.
13. During construction, emissions of particulate matter and NO_x/NO₂ from Non-road mobile machinery (NRMM) can affect local air quality. Following measures are recommended in accordance with the TG22 to minimise the emissions in construction sites:
 - Ensure all equipment complies with the appropriate NRMM standards;
 - Where feasible, ensure further abatement plant is installed on NRMM equipment, e.g. Diesel Particulate Filters (DPFs);
 - Ensure all vehicles switch off engines when stationary – no idling vehicles;
 - Avoid the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where possible; and
 - Impose and signpost a maximum-speed-limit of 15mph on surfaced and 10mph on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate).

Fine Particles

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.

14. How has exposure to PM2.5 been considered when selecting the development site? *Applicants are advised to consider the following in their application:*
 - a. 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,
 - b. Site proximity to pollution sources and the impact of these on users of the development,
 - c. Exposure and emissions during both construction and in-use.
15. 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:*
 - a. Site layout,
 - b. The development's design,
 - c. Technology used in the construction or installed for use in the development,

d. Construction and future use of the development.

Further Air Quality Comments

Additional Comments regarding Air Quality from Crawley BC Officers given the location of their Crawley AQMA in relation to the development site.

ANY RECOMMENDED CONDITIONS:

- 1. Pre-Commencement Condition:** Prior to the commencement of the development, a detailed mitigation strategy establishing the on-site measures to improve air quality at both the operational and construction phases shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall be written in accordance with the Air Quality & Emissions Reduction Guidance (2021) 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 against the impact of the development in accordance with Policy 24 of the Horsham District Planning Framework (2015) and Air quality and emissions mitigation guidance for Sussex (2021).

- 2. 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.

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:

EHL

DATE:

15 October 2025