



## **HORSHAM DISTRICT COUNCIL CONSULTATION**

<b>TO:</b>	Development Control
<b>FROM:</b>	Environmental Health and Licensing
<b>REFERENCE:</b>	DC/25/2006
<b>LOCATION:</b>	Land East of 1 To 25 Hayes Lane Slinfold
<b>DESCRIPTION:</b>	Outline application with all matters to be reserved except for access and layout, for the erection of 38no. dwellings, (including 13no. on-site affordable housing units), together with access from Hayes Lane, vehicle and cycle parking, landscaping, open space and play provision, sustainable drainage, and re-alignment of Public Right of Way No.3782
<b>RECOMMENDATION:</b>	More Information
<b>SUMMARY OF COMMENTS &amp; RECOMMENDATION:</b> Comments relating to below information: Air Quality Solutions – Air Quality Assessment (dated 04/09/2025)	

## MAIN COMMENTS:

It is unclear which version of the EFT has been used, as three have been mentioned in the report. Please ensure the latest version is being used (v13.1).

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 the Air Quality Assessment).

Using the information provided in the Air Quality Assessment, I carried out these calculations and arrived at different emissions and 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 EFT and 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 = 2030
- End year = 2034
- Price base year = 2025 (baseline year for the project appraisal)

Sussex Air (2021) Air Quality and Emissions Mitigation Guidance aims to avoid the duplication of measures that would normally be required through other regimes. As the Approved Document S is now in force, we would not recommend including charging points in the mitigation plan unless those were offsite, to support the EV Charging Network and Delivery Plans for the local area. Similarly, we would not support cycle parking and shelters as this is already an expectation of the LTP/HDC cycling strategies and related policies. The measure to "enhance the existing footpath that crosses the site and link it to the major cycleway to the north of the site" could be acceptable mitigation if the path is constructed of a material that would make it all-weather appropriate. It has been noted that the Landscape and Visual Impact Assessment mentions the rights of way within the site can be re-surfaced with permeable bound gravel – should this material be used; this would be supported and be acceptable mitigation. This should be explicitly written within the Air Quality Assessment.

An Interim Planning Guidance on the consideration of the Environmental Act PM<sub>2.5</sub> 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 PM<sub>2.5</sub> and its precursors as far as is reasonably practicable.

1. How has exposure to PM<sub>2.5</sub> been considered when selecting the development site? *Applicants are advised to consider the following in their application:*
  - 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,
  - Site proximity to pollution sources and the impact of these on users of the development,
  - Exposure and emissions during both construction and in-use.
2. What actions and/or mitigations have been considered to reduce PM<sub>2.5</sub> exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of PM<sub>2.5</sub> 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:*

- Site layout,
- The development's design,
- Technology used in the construction or installed for use in the development,
- Construction and future use of the development.

**ANY RECOMMENDED CONDITIONS:**

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

<b>NAME:</b>	Isabelle Carter
<b>DEPARTMENT:</b>	Environmental Health and Licensing
<b>DATE:</b>	15/01/2026