



Horsham  
District  
Council

## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Development Control
<b>FROM:</b>	Environmental Health and Licensing
<b>REFERENCE:</b>	DC/25/2057
<b>LOCATION:</b>	Land North of Little Slaughterford Chapel Road
<b>DESCRIPTION:</b>	Proposed development of 68 dwellings with vehicular and pedestrian accesses, public open space, hard and soft landscaping and associated works including supporting foul and surface water drainage works, and works to existing culverted watercourse on site.
<b>RECOMMENDATION:</b>	More Information
<b>SUMMARY OF COMMENTS &amp; RECOMMENDATION:</b> Comments relating to below information: SLR Consulting Limited's Air Quality Assessment, dated 10 <sup>th</sup> September 2025	

**MAIN COMMENTS:**

There are two different figures for traffic generated by the development: 341 and 329. Could this be clarified which is correct?

The EFT and damage cost appear to be inaccurate. The outputs from the EFT are too low for NO2 emissions, and higher than expected for PM2.5. 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 <https://www.gov.uk/government/publications/assess-the-impact-of-air-quality>).

Using the information provided in the Air Quality Assessment, I carried out these calculations and arrived at a much lower cost than was reported. 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 = 2027
- End year = 2031
- Price base year = 2025 (baseline year for the project appraisal)

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. For example, we would not accept the charging points unless those were offsite (to support the EV Charging Network and Delivery Plans for the local area), as this is required through Approved Document S. Similarly, we would not support cycle parking and shelters as this is already an expectation of the LTP/HDC cycling strategies and related policies. 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

**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 (CEMP) plan 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>	21/01/2026