



## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Development Control
<b>FROM:</b>	Environmental Health and Licensing
<b>REFERENCE:</b>	DC/25/1019
<b>LOCATION:</b>	Land to the West of Shoreham Road Small Dole West Sussex
<b>DESCRIPTION:</b>	Outline planning application for up to 45 dwellings (including affordable homes) with all matters reserved apart from access.
<b>RECOMMENDATION:</b>	<del>Advice / No Objection / Objection / More Information / Modification / Refusal</del>

### **SUMMARY OF COMMENTS & RECOMMENDATION:**

Comments relating to below information:

RSK Air Quality Assessment dated March 2025.

### **MAIN COMMENTS:**

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

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. We have noted that the years used for the EFT are different to those used in the damage cost.

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 submit a new damage-cost, including a breakdown of your workings on the Excel files 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)

Additionally, the EFT used should be the most current version (V13.1), which was released in March 2025.

The Mitigation measures for the proposed development should be in line with the Sussex Air (2021) *Air Quality and Emissions Mitigation Guidance* for Sussex. The Sussex Air guidance aims to avoid the duplication of measures that would normally be required through other regimes. For example, pedestrian crossings and public right of ways would only be considered acceptable if they exceed the minimum requirements set out other planning policies, such as the Horsham District Planning Framework.

#### **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 is recommended as a condition:

**Condition:** The development hereby approved shall not commence until a Construction and Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. During site clearance, preparation and construction the dust and Air Emission Mitigation measures described in Appendix B of the Air Quality Assessment report (RSK, March 2025) shall be adopted. The CEMP shall include details of the following relevant measures:

- i. An introduction consisting of construction phase environmental management plan, definitions and abbreviations and project description and location;
- ii. A description of management responsibilities;
- iii. A description of the construction programme which identifies activities likely to cause high levels of noise or dust;
- iv. Site working hours and a named person for residents to contact;
- v. Detailed Site logistics arrangements;
- vi. Details regarding parking, deliveries, and storage;
- vii. Details regarding dust and noise mitigation measures to be deployed including identification of sensitive receptors and ongoing monitoring;
- viii. Details of the hours of works and other measures to mitigate the impact of construction on the amenity of the area and safety of the highway network; and
- ix. Communication procedures with the LBL and local community regarding key construction issues – newsletters, fliers etc.
- x. Details of traffic construction routing to and from the site The construction shall thereafter be carried out in accordance with the details and measures approved in the CEMP for the related phase.

**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>	21/08/2025