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**Date:** 02/09/2025

**From:** Nalisha Parmar (RWDI)

**To:** Thais Delboni (Environmental Health – Horsham District Council)

**CC:** Ryan Webb (RWDI), John Brindley (DHM Stallard), Matthew Elnaugh (Riverdale Developments)

**RWDI Ref:** #2508904 Rev\_01

**Subject:** Land to the North and South of Mercer Road Warnham, West Sussex –  
Comments from Environmental Health Department

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## INTRODUCTION

This technical report has been prepared to address comments made by the Environmental Protection Officer (EPO), Thais Delboni, from the Environmental Health department for the application at the Land To The North and South of Mercer Road Warnham, West Sussex on 7<sup>th</sup> April 2025 (Ref: DC/25/0151).

The EPO comments and queries are detailed in blue ink, where RWDI's response is provided in black ink.

## AIR QUALITY MITIGATION PLAN

***Comment 1:** The 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 and/or offset emissions from the additional traffic and buildings. Applicants are required to submit a mitigation plan detailing measures to mitigate and/or offset the impacts and setting out itemised costing for each proposed measure, with the total estimated value of all the measures being equal to the total damage costs.*

*Regarding the measures to be put forward in the air quality mitigation plan we would request that the applicant avoids 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. Instead, we would highly recommend support to the delivery of HDC Local Cycling and Walking Infrastructure Plan and WSCC Bus Service Improvement Plan.*

**Response 1:** To offset the Damage Cost value of £32,952, mitigation measures will be implemented. Measures have not been finalised at present due to discussions and alterations of the site layout. These measures will be provided at a later date, once the layout is finalised.

## PM<sub>2.5</sub>

***Comment 2:** 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 must 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.*

### **Response 2:**

The interim planning guidance states the following queries:

1. How has exposure to PM<sub>2.5</sub> been considered when selecting the development site?
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?

Response to Question 1 of the Interim Planning Guidance: The development location is on fields that straddle Mercer Road. To the north lies an industrial estate, however PM<sub>2.5</sub> was not deemed as an issue for the area as the development site is not in close proximity to external industrial works. The areas surrounding the site are sparsely populated, with only the A264, located to the south. This road was considered within the air quality assessment process.

The development has been considered in relation to PM<sub>2.5</sub> prior to the application submission. This has included a study of the neighbouring roads and advising on roads to be considered from the transport assessment, which also have fed into the air quality dispersion modelling assessment.

A dust risk assessment was undertaken in order to understand the dust risk to the neighbouring community during the construction phase, where dust includes PM<sub>10</sub> and PM<sub>2.5</sub> concentrations.

A dispersion modelling assessment was undertaken to understand concentrations of PM<sub>2.5</sub> during the operational phase, which considered:

- the impact of the development on the neighbouring community; and
- The impact of the area on the future site users.

Response to Question 2 of the planning guidance: The dust risk assessment detailed that there is expected to be a medium risk during construction activities and mitigation measures have been prepared based on IAQM guidance.

The construction phase was modelled using ADMS-Roads. It identified that concentrations of PM<sub>2.5</sub> are below the air quality objective within the site area. Additionally, the introduction of new vehicles on the road will not worsen PM<sub>2.5</sub> concentrations for the wider area. Therefore, no additional mitigation measures were required.

The development layout has also been designed to preserve the existing treeline to the north and south, that provides a natural buffer against the industrial estate and the A264 Road.

## OPERATIONAL IMPACTS

***Comment 3:** LAQM Air Quality Impacts on Nature Sites 2020 states that it is no longer appropriate to scope out the need for a detailed assessment of an individual project or plan using, for example, the 1000 annual average daily traffic (AADT) increase in the Design Manual For Roads and Bridges (DMRB) or the 1% of the critical level or load used by Defra/Environment Agency without first considering the in-combination impact with other projects and plans. Clarification whether Connect and Ecology Partnership considered the in-combination impact when assessing negative impacts upon Warnham LNR (paragraph 7.1.2).*

**Response 3:** The project's ecologists (Ecology Partnership) have detailed that air quality impacts are typically considered when assessing Special Protection Areas, Special Area of Conservations, Ramsar sites, Sites of Special Scientific Interest and occasionally Ancient Woodland. For Local Nature Reserves (LNR), the ecological threshold is not considered high enough to warrant air quality investigations in their experience. Their understanding is *"nitrogen and ammonia deposition is normally screened out of impacts upon freshwater as impacts are usually associated with phosphorus, which is usually associated with waste water"*. Therefore, air quality has been screened out from an ecological perspective.