



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DC/25/1327
LOCATION:	Land East Of Mousdell Close Rectory Lane Ashington
DESCRIPTION:	Erection of 74 dwellings with associated access, parking and landscaping.
RECOMMENDATION:	More Information
SUMMARY OF COMMENTS & RECOMMENDATION:	
Comments relating to below information: Redmore Environmental, Air Quality Assessment dated July 2025.	

MAIN COMMENTS:

In table 9, the diffusion tubes "Storrington 8,9,10 AURN" do not need to be included as these three tubes are co-located with HO4 and are used to calculate bias. HO4 is a monitoring site, therefore that result is more representative.

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 damage cost webpage).

Using the information provided in the Air Quality Assessment, I carried out these calculations and arrived at 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 damage-cost, including a breakdown of your workings on the sheets 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)

The Sussex Air guidance seeks to prevent duplication of measures that are already required under other regulatory frameworks. For example, if EV charging points are proposed as part of the mitigation package, they will only be considered acceptable if they exceed the minimum requirements set out in the West Sussex County Council (WSCC) parking guidance. Could the applicant provide details on the type of EV charge points that are being proposed?

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 on Table 16 of the Air Quality Assessment report (Redmore Environmental, July 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 HDC 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).

NAME:	Isabelle Carter
DEPARTMENT:	Environmental Health and Licensing
DATE:	11/09/2025