



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land To The North and South of Mercer Road Warnham
DESCRIPTION:	Redevelopment of the site to provide 304 residential units, parking, a retail unit, public car park, public open space, attenuation basins and landscaping
REFERENCE:	DC/25/0151
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: We have reviewed the September-2024 Technical Note, document reference #2508904 Rev_01, and have the following comments to make.	

MAIN COMMENTS:

Given the site's proximity to the industrial estate, the nature of the materials being handled, and the volume of HDV movements, a detailed dust assessment for disamenity dust is required, in line with the IAQM's Guidance on the Assessment of Mineral Dust Impacts for Planning (2016).

The most prominent air quality concern during mineral-related activities such as the one operating at the industrial state, is dust accumulation from deposition, which can cause disamenity through surface soiling. Another potential impact is the increase in ambient concentrations of suspended particulate matter (PM) near the site.

This assessment should include, but not be limited to:

- Evaluation of dust deposition impacts and associated disamenity
- Prediction of PM and dust deposition levels using appropriate assessment tools
- Assessment of potential effects on relevant sensitive receptors

As outlined in the report, statutory nuisance legislation is not designed to guarantee a high level of amenity, but rather to serve as a minimum safeguard against harmful emissions. Therefore, additional dust monitoring at the site would be beneficial to build confidence that the developer can achieve a high standard of amenity for future residents.

According to Paragraph 200 of the National Planning Policy Framework (NPPF, 2024):

“Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”

We also have concerns about relying solely on the existing treeline to the north and south of the site as a mitigation measure. Trees have a finite lifespan, and it is unclear who would be responsible for maintaining or replanting them if they die. Additionally, during the growth phase, newly planted trees would not provide an effective dust barrier. What mitigation would be in place during this period?

ANY RECOMMENDED CONDITIONS:

NAME:	Thais Delboni
DEPARTMENT:	Environmental Health
DATE:	02 October 2025