



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 december-2024 Air Quality Assessment, document reference 2401475-SEC-00004-02, and have the following comments to make.	

MAIN COMMENTS:**Air Quality Mitigation Plan**

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.

PM2.5

An Interim Planning Guidance on the consideration of the Environmental Act PM2.5 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 PM2.5 and its precursors as far as is reasonably practicable.

Operational Impacts

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).

Construction

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.

ANY RECOMMENDED CONDITIONS:

Pre-Commencement Condition: Prior to the commencement of the development, a Construction and Environmental Management Plan (CEMP) shall be 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 paragraph 9.1.3 of the Air Quality Assessment report (Southdowns environmental consultants, December 2024) 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).

NAME:	Thais Delboni
DEPARTMENT:	Environmental Health
DATE:	07 April 2025