



## HORSHAM DISTRICT COUNCIL CONSULTATION

<b>TO:</b>	Development Control
<b>FROM:</b>	Environmental Health and Licensing
<b>REFERENCE:</b>	DC/25/0894
<b>LOCATION:</b>	Land to the South of Broadbridge Way, Broadbridge Heath, West Sussex
<b>DESCRIPTION:</b>	Full Planning Application for the erection of 89no. residential dwellings comprising dwellings (54no.) and apartments (35no.), 36% affordable homes, creation of new vehicular access on to Sergeant Way, provision of public open space, landscaping and drainage solutions
<b>RECOMMENDATION:</b>	More Information / Modification
<b>SUMMARY OF COMMENTS &amp; RECOMMENDATION:</b> Comments relating to below information: Air Quality Assessment produced by Omnia's partner Redmore Environmental Ltd. dated April 2025	
<b>MAIN COMMENTS:</b> <p>The monitoring site referenced in the report "London Rd Purbrook" does not exist. The ID number provided (4) corresponds to "Broadbridge_Heath 1", which is near to the proposed development - is this the site you are referring to?</p> <p>Additionally, in Table 16 Interim Planning Guidance Questions, there is a control measure that states the site is set back from London Road, but this road is not near the site. Do you mean Broadbridge Way?</p> <p>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 website referenced in the Air Quality Assessment).</p> <p>Using the information provided, 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 as supporting evidence?</p> <p>For clarity, these are the figures I used for the EFT and Damage Cost toolkit:</p> <ul style="list-style-type: none"> <li>Start year = 2027</li> </ul>	

- End year = 2031
- Price base year = 2025 (baseline year for the project appraisal)

All mitigation measures for the proposed development must align with the *Sussex Air Quality and Emissions Mitigation Guidance for Sussex (2021)*. 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. In this instance, for an operational year of 2027, 56% of car park spaces need to have an EV charging point. 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 improvements to existing cycling paths, and including cycle paths that meet up with current paths in the development design. Construction Dust Mitigation is also not an acceptable mitigation measure to include because it is already a requirement. Could you clarify if whether the "Improved and New Pedestrian Access" is already a requirement you are fulfilling, or if you are going beyond what is asked, as otherwise this cannot be used for the air quality mitigation.

The emissions mitigation statement should include itemised costs for each proposed option, along with the total cost of all mitigation measures. This total must be equal to the calculated emissions damage cost based on the emissions assessment.

#### **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 15 of the Air Quality Assessment report (Omnia, April 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>	24/06/2025