



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DC/26/0585
LOCATION:	Land at Station Road Warnham West Sussex RH12 3SR
DESCRIPTION:	Outline application for the erection of up to 24 residential dwellings, with all matters reserved except for access.
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: Comments relating to below information: Quantum Air's Environmental Air Quality Assessment, dated 23 rd June 2026	

MAIN COMMENTS:

It should be noted that the 2024 diffusion tube monitoring data were available at the time of preparing the assessment, and it is therefore unclear why these data were not used. In addition, the automatic analyser results presented do not appear to align with the verified data published in the Council's latest Air Quality Annual Status Report. The latest air quality monitoring results are attached for reference – if you have to make any updates or technical notes, it would be best to use the most recent data.

The inclusion of an indicative air quality damage cost assessment is welcomed and provides an initial indication of the potential scale of mitigation required. We agree that this assessment should be revisited at the Reserved Matters stage when trip generation and associated emissions can be more accurately quantified.

It is noted that no specific air quality mitigation measures have been proposed at this stage. Given that the mitigation required is dependent on the final development details and updated damage cost calculations, it is recommended that a planning condition be imposed requiring the submission and approval of an air quality mitigation plan at the Reserved Matters stage. This should demonstrate how any identified air quality impacts will be appropriately mitigated in accordance with relevant IAQM and Sussex Air Quality Guidance. We would support contributions to improvement of connectivity, given the site location. 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 strongly support improvements to the existing cycling network, including the provision of cycle routes within the development that connect to existing infrastructure, as these are likely to deliver greater benefits for sustainable travel and access to employment, services, and local facilities. Mitigation measures should also have regard to:

- Horsham Local Cycling and Walking Infrastructure Plan (LCWIP);
- West Sussex Active Travel Strategy; and
- DfT Connectivity Tool.

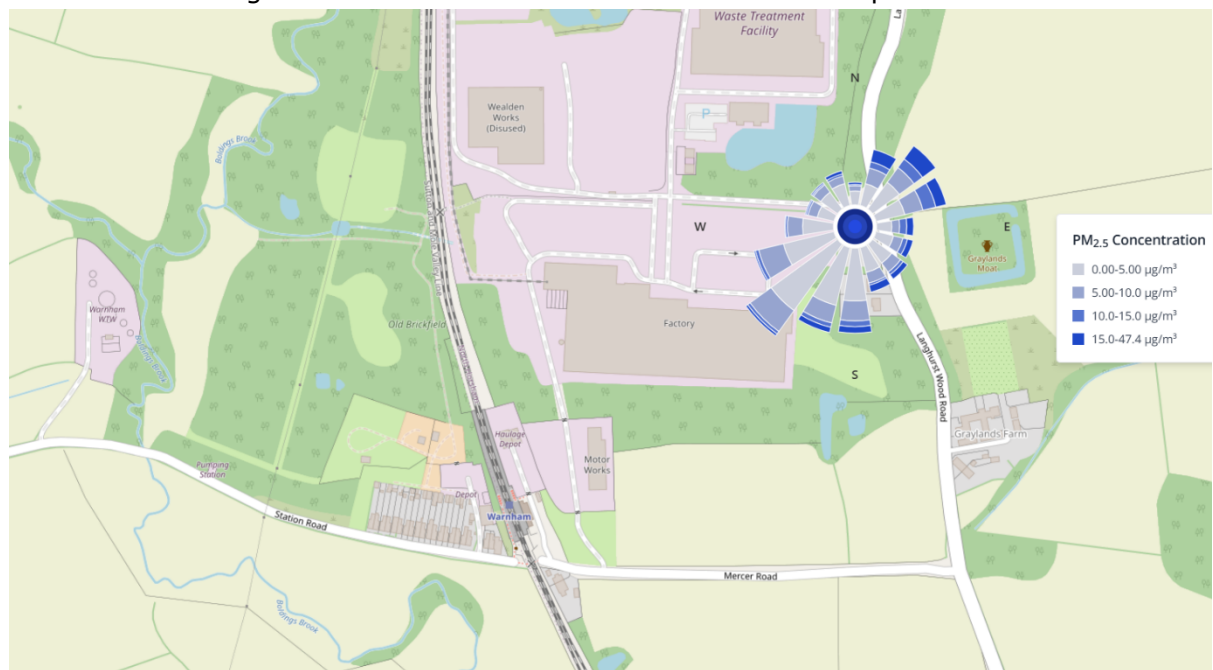
Whilst background concentrations are relatively low, future residents will still be exposed to emissions from surrounding industrial and commercial sources. The assessment should acknowledge the National Atmospheric Emissions Inventory (NAEI) emissions map (<https://naei.energysecurity.gov.uk/emissionsapp/>), which identifies a number of local emission sources. Although the NAEI data are presented at a coarse spatial resolution and are not suitable for assessing concentrations at individual receptors, they provide useful context on the distribution of emissions in the area. The assessment should also recognise that pollutant concentrations may vary across the site and may not be fully represented by averaged grid-level data.

Further clarification is sought regarding the odour survey methodology, including the locations where sniff testing was undertaken. It is unclear whether Warnham Wastewater Treatment Works, located west of the site, has been fully considered as a potential odour source.

The meteorological conditions during the afternoon of 27 March 2025 appear to be among those most likely to result in odours from the wastewater treatment works being carried towards the site. Given that access to the application site was not available during the survey, it is unclear how it has been concluded that odours were not present within the proposed development area, particularly towards the north-western part of the site. Where were the 6 observations undertaken?

Additional information should therefore be provided on the survey locations, and consideration of Warnham Wastewater Treatment Works.

Although the prevailing wind is SW, given the emissions and proximity to the industrial sites, there is concern that residents will be impacted by dust and odour emissions when the wind is coming the other direction. As seen in the modelled pollution rose below.



The modelled results suggest higher concentrations of pollutants coming from NE, and when it is coming from SW concentrations tend to be lower.

We have received dust complaints from a commercial site on Mercer Road regarding fugitive dust, this is an ongoing complaint. Further analysis has identified that the dust was coming from the brickworks which led to further mitigation action.

We would like further clarification on the observations made on 12/06/2026. We were under the impression that the brickworks was not operational from the end of May to end of June. Please confirm if all industrial sites were under normal operations during all the observations.

ANY RECOMMENDED CONDITIONS:

Pre-Commencement Condition: The development hereby approved shall not commence until a updated damage cost and subsequent Air Quality Mitigation Plan has been submitted to and approved in writing by the local planning authority.

Reason: To mitigate against the impact of the development in accordance with Policy 24 of the Horsham District Planning Framework (2015) and Air quality and emissions mitigation guidance for Sussex (2021).

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 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:	20/07/2026

Table A.1 – Annual Mean NO₂ Monitoring Results: Automatic Monitoring (µg/m³)

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2025 (%) ⁽²⁾	2021	2022	2023	2024	2025
HO2	517490	130588	Roadside	100.0	94.3	21.1	17.7	16.2	15.7	15.9
HO4	509089	114197	Roadside	89.8	89.8	20.1	17.6	17.4	16.6	15.7
HO5	521359	122552	Roadside	N/A	N/A	20.3	21.0	24.6	16.2	-

☒ Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22

☒ Reported concentrations are those at the location of the monitoring site (annualised, as required), i.e. prior to any fall-off with distance correction

☒ Where exceedances of the NO₂ annual mean objective occur at locations not representative of relevant exposure, the fall-off with distance concentration has been calculated and reported concentration provided in brackets for 2025

Notes:

The annual mean concentrations are presented as µg/m³.

Exceedances of the NO₂ annual mean objective of 40 µg/m³ are shown in **bold**.

All means have been “annualised” as per LAQM.TG22 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

Concentrations are those at the location of monitoring and not those following any fall-off with distance adjustment.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Table A.2 – Annual Mean NO₂ Monitoring Results: Non-Automatic Monitoring (µg/m³)

Diffusion Tube ID	X OS Grid Ref (Eastin g)	Y OS Grid Ref (Northi ng)	Site Type	Valid Data Capture for Monitori ng Period (%) ⁽¹⁾	Valid Data Capture 2025 (%) ⁽²⁾	2021	2022	2023	2024	2025
Ashington sites										
Ashington 1	513053	115867	Urban Background	N/A	N/A	-	-	-	7.7	-
Ashington 2	513241	116283	Roadside	100.0	100.0	-	-	-	-	12.6
Billingshurst sites										
Billingshurst 1	508650	125855	Roadside	75.0	75.0	22.2	20.3	19.7	15.6	15.2
Billingshurst 2	509026	125936	Roadside	N/A	N/A	-	-	-	12.4	-
Billingshurst 3	508515	124926	Roadside	N/A	N/A	-	-	-	10.8	-
Billingshurst 4	508583	125568	Roadside	91.7	90.4	-	-	-	-	12.0
Billingshurst 5	508787	125158	Roadside	91.7	90.4	-	-	-	-	12.7
Broadbridge Heath sites										
Broadbridge_Heat h 1	514596	130556	Roadside	N/A	N/A	-	-	10.2	-	-

Diffusion Tube ID	X OS Grid Ref (Eastin g)	Y OS Grid Ref (Northi ng)	Site Type	Valid Data Capture for Monitori ng Period (%) ⁽¹⁾	Valid Data Capture 2025 (%) ⁽²⁾	2021	2022	2023	2024	2025
Broadbridge_Heat h 1.1	514605	130621	Roadside	91.7	92.3	-	-	-	11.5	13.1
Cowfold sites										
Cowfold 1, Cowfold 2	521326	122614	Roadside	100.0	100.0	26.5	26.4	24.1	21.5	22.3
Cowfold 3	521272	122675	Roadside	83.3	84.6	26.5	25.5	24.1	21.9	19.9
Cowfold 4	521314	122700	Roadside	83.3	84.6	22.2	20.3	19.5	17.5	14.5
Cowfold 5N	521070	122706	Roadside	N/A	N/A	21.3	20.3	18.7	-	-
Cowfold 6N	521312	122248	Roadside	100.0	100.0	20.5	20.3	19.6	16.5	17.1
Cowfold 7N	521432	122486	Roadside	100.0	100.0	31.2	31.7	28.3	24.9	25.6
Cowfold 8N	521417	122632	Urban Background	91.7	90.4	10.5	10.3	8.9	8.1	8.7
Cowfold 9N	521584	122457	Roadside	N/A	N/A	18.3	18.7	-	-	-
Cowfold 9N.1	521626	122471	Roadside	N/A	N/A	-	-	18.2	-	-

Diffusion Tube ID	X OS Grid Ref (Eastin g)	Y OS Grid Ref (Northi ng)	Site Type	Valid Data Capture for Monitori ng Period (%) ⁽¹⁾	Valid Data Capture 2025 (%) ⁽²⁾	2021	2022	2023	2024	2025
Cowfold AU A	521359	122552	Roadside	100.0	100.0	19.9	20.0	17.5	15.8	16.9
Faygate sites										
Faygate 1	523221	134924	Kerbside	N/A	N/A	-	-	-	8.3	-
Henfield sites										
Henfield 1n	521495	115906	Roadside	100.0	100.0	20.9	18.2	18.2	16.6	16.9
Horsham sites										
A281_A24	515513	131159	Other	N/A	N/A	-	-	-	11.8	-
Horsham 1N	517489	130607	Roadside	N/A	N/A	23.2	22.6	20.9	-	-
Horsham 3N	516012	130486	Urban Background	100.0	100.0	9.9	8.8	7.6	7.2	7.8
Horsham 4N	517680	130069	Urban Background	N/A	N/A	9.0	8.7	-	-	-
Horsham 5N	518214	131143	Roadside	N/A	N/A	22.7	21.6	20.4	18.1	-
Horsham 6N	518653	132481	Roadside	N/A	N/A	19.5	17.6	15.0	14.3	-

Diffusion Tube ID	X OS Grid Ref (Eastin g)	Y OS Grid Ref (Northi ng)	Site Type	Valid Data Capture for Monitori ng Period (%) ⁽¹⁾	Valid Data Capture 2025 (%) ⁽²⁾	2021	2022	2023	2024	2025
Horsham 6N.1	518650	132451	Roadside	75.0	75.0	-	-	-	-	11.5
Horsham 7N	516955	132213	Roadside	91.7	92.3	19.4	18.9	16.6	13.5	13.2
Horsham 8N	516649	130221	Roadside	83.3	82.7	20.7	19.9	18.7	13.4	17.7
Horsham 9N.1	518121	131161	Roadside	100.0	100.0	23.3	24.1	20.3	17.3	17.5
Horsham 12	516909	130755	Roadside	N/A	N/A	33.4	29.7	-	-	-
Horsham 12.1	516853	130621	Roadside	N/A	N/A	-	-	20.1	-	-
Horsham 12.2	516877	130704	Roadside	91.7	90.4	-	-	-	22.0	24.2
Horsham 13	516307	130493	Roadside	91.7	92.3	-	-	-	8.6	10.3
N. Horsham 1N	517702	133570	Roadside	N/A	N/A	17.6	13.9	-	-	-
N. Horsham 2N	517477	134013	Kerbside	100.0	100.0	14.6	14.1	14.1	11.9	11.4
N. Horsham 3N	518814	133483	Roadside	100.0	100.0	-	-	26.2	21.7	26.4

Diffusion Tube ID	X OS Grid Ref (Eastin g)	Y OS Grid Ref (Northi ng)	Site Type	Valid Data Capture for Monitori ng Period (%) ⁽¹⁾	Valid Data Capture 2025 (%) ⁽²⁾	2021	2022	2023	2024	2025
Southwater 1	515639	126599	Roadside	N/A	N/A	21.7	19.4	19.0	-	-
Southwater 1.1	515631	126135	Roadside	100.0	100.0	-	-	-	10.2	10.9
Southwater 2	515748	127431	Roadside	91.7	92.3	-	-	-	13.5	14.4
Rusper sites										
Rusper 1	520538	137136	Kerbside	100.0	100.0	-	-	-	11.4	12.0
Steyning sites										
Steyning 4N	517646	111170	Roadside	100.0	100.0	19.0	18.5	18.2	15.7	15.3
Storrington sites										
Storrington 1	508960	114271	Roadside	100.0	100.0	24.3	32.9	32.9	28.6	27.5
Storrington 3	508935	114294	Roadside	100.0	92.3	24.8	23.7	21.8	19.3	19.6
Storrington 4	508833	114274	Roadside	91.7	90.4	25.9	26.7	24.5	23.3	23.1
Storrington 5	508745	114286	Roadside	100.0	100.0	19.9	19.0	19.2	16.4	16.8

Diffusion Tube ID	X OS Grid Ref (Eastin g)	Y OS Grid Ref (Northi ng)	Site Type	Valid Data Capture for Monitori ng Period (%) ⁽¹⁾	Valid Data Capture 2025 (%) ⁽²⁾	2021	2022	2023	2024	2025
Storrington 6	508398	114444	Roadside	100.0	100.0	17.1	17.4	17.9	15.9	16.6
Storrington 7	508367	114384	Roadside	91.7	92.3	17.6	17.7	18.8	15.9	15.2
Storrington 8 AURN, Storrington 9 AURN, Storrington 10n AURN	509089	114197	Roadside	100.0	92.3	21.7	21.7	19.8	17.3	16.3
Storrington 11n	508524	114363	Roadside	100.0	100.0	26.5	25.9	24.8	20.7	20.6
Storrington 12n	508598	114323	Roadside	N/A	N/A	23.0.	22.4	20.9	-	-
Storrington 13n	508671	114305	Roadside	100.0	100.0	23.1	23.0	21.1	18.4	19.1
Storrington 14n	509319	114160	Roadside	N/A	N/A	15.8	26.3	23.5	-	-
Storrington 14.1	509347	114141	Roadside	100.0	100.0	-	-	-	26.1	26.3
Storrington 15n	509103	114532	Roadside	N/A	N/A	15.4	14.6	14.7	-	-
Storrington 16n	508971	114354	Roadside	100.0	92.3	19.2	18.4	17.5	15.1	17.3

Diffusion Tube ID	X OS Grid Ref (Eastin g)	Y OS Grid Ref (Northi ng)	Site Type	Valid Data Capture for Monitori ng Period (%) ⁽¹⁾	Valid Data Capture 2025 (%) ⁽²⁾	2021	2022	2023	2024	2025
Storrington 17n	508679	114144	Urban Background	91.7	92.3	10.0	9.6	8.2	7.6	8.5
Storrington 18n	508215	114348	Roadside	N/A	N/A	18.1	15.4	13.7	-	-
Storrington 19n	508948	114268	Roadside	100.0	100.0	39.6	38.1	37.0	32.7	35.2

☒ **Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22**

☒ **Diffusion tube data has been bias adjusted**

☒ **Reported concentrations are those at the location of the monitoring site (bias adjusted and annualised, as required), i.e. prior to any fall-off with distance correction**

Notes:

The annual mean concentrations are presented as $\mu\text{g}/\text{m}^3$.

Exceedances of the NO_2 annual mean objective of $40\mu\text{g}/\text{m}^3$ are shown in **bold**.

NO_2 annual means exceeding $60\mu\text{g}/\text{m}^3$, indicating a potential exceedance of the NO_2 1-hour mean objective are shown in **bold and underlined**.

Means for diffusion tubes have been corrected for bias. All means have been "annualised" as per LAQM.TG22 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

Concentrations are those at the location of monitoring and not those following any fall-off with distance adjustment.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Table A.3 – 1-Hour Mean NO₂ Monitoring Results, Number of 1-Hour Means > 200µg/m³

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2025 (%) ⁽²⁾	2021	2022	2023	2024	2025
HO2	517490	130588	Roadside	100.0	94.3	0	0 (66.3)	0	0	0
HO4	509089	114197	Roadside	89.8	89.8	0	0 (77.2)	0	0	0

Notes:

Results are presented as the number of 1-hour periods where concentrations greater than 200µg/m³ have been recorded.

Exceedances of the NO₂ 1-hour mean objective (200µg/m³ not to be exceeded more than 18 times/year) are shown in **bold**.

If the period of valid data is less than 85%, the 99.8th percentile of 1-hour means is provided in brackets.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Table A.4 – Annual Mean PM₁₀ Monitoring Results (µg/m³)

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2025 (%) ⁽²⁾	2021	2022	2023	2024	2025
HO2	517490	130588	Roadside	100.0	92.4	17.5	19.3	20.5	16.1	13.6
HO4	509089	114197	Roadside	93.6	93.6	-	14.0	13.7	12.6	15.1

☒ **Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22**

Notes:

The annual mean concentrations are presented as µg/m³.

Exceedances of the PM₁₀ annual mean objective of 40µg/m³ are shown in **bold**.

All means have been “annualised” as per LAQM.TG22 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

Table A.5 – 24-Hour Mean PM₁₀ Monitoring Results, Number of PM₁₀ 24-Hour Means > 50µg/m³

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2025 (%) ⁽²⁾	2021	2022	2023	2024	2025
HO2	517490	130588	Roadside	100.0	92.4	0	0	0	1	2
HO4	509089	114197	Roadside	93.6	93.6	-	0 (21.5)	0	0	2

Notes:

Results are presented as the number of 24-hour periods where daily mean concentrations greater than 50µg/m³ have been recorded.

Exceedances of the PM₁₀ 24-hour mean objective (50µg/m³ not to be exceeded more than 35 times/year) are shown in **bold**.

If the period of valid data is less than 85%, the 90.4th percentile of 24-hour means is provided in brackets.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

*It should be noted that the method of monitoring changed from TEOM to a Fidas200 in 2025. TG(22) states “When reporting PM10 trends, only data derived from the same method should be used”. The previous data has been included for transparency, but it should not be used to draw conclusions on the trends over the last 5 year.

Table A.6 – Annual Mean PM_{2.5} Monitoring Results (µg/m³)

Site ID	X OS Grid Ref (Easting)	Y OS Grid Ref (Northing)	Site Type	Valid Data Capture for Monitoring Period (%) ⁽¹⁾	Valid Data Capture 2025 (%) ⁽²⁾	2021	2022	2023	2024	2025
HO2*	517490	130588	Roadside	100.0	92.4	12.3	13.1	14.6	10.1	9.0
HO4	509089	114197	Roadside	93.6	93.6	-	7.3	7.7	7.7	8.5
HO5	521359	122552	Roadside	89.1	89.1	-	-	-	-	9.8

☒ **Annualisation has been conducted where data capture is <75% and >25% in line with LAQM.TG22**

Notes:

The annual mean concentrations are presented as µg/m³.

All means have been “annualised” as per LAQM.TG22 if valid data capture for the full calendar year is less than 75%. See Appendix C for details.

(1) Data capture for the monitoring period, in cases where monitoring was only carried out for part of the year.

(2) Data capture for the full calendar year (e.g. if monitoring was carried out for 6 months, the maximum data capture for the full calendar year is 50%).

* PM_{2.5} values for HO2 were estimated from the PM₁₀ data using: a nationally derived correction multiplying ratio of 0.7 (2021); subtracting a national factor of 6.4 (2022); subtracting a national factor of 5.9 (2023); and subtracting a national factor of 6.0 (2024).