



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DC/26/0640
LOCATION:	Cedar Cottage Sandygate Lane Lower Beeding West Sussex RH13 6LR
DESCRIPTION:	Demolition of existing dwelling and erection of 24no. dwellings including the creation of a new access from Sandygate Lane with associated works.
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: Comments relating to below information: Air Quality Experts Ltd's Air Quality Emissions Mitigation Assessment, dated July 2026	

MAIN COMMENTS:

A construction dust assessment has not been provided, despite this being a requirement of the air quality assessment. A dust assessment should therefore be undertaken in accordance with the IAQM Guidance on the Assessment of Dust from Demolition and Construction (2024) and submitted.

In relation to the EFT and air quality damage cost calculation, the assessment should use the first year of operation as the opening year scenario. It is therefore unclear why the current assessment has been undertaken using a base year of 2024. Additionally, the appropriate price base year should be 2026 rather than 2025.

It is recommended that the damage cost assessment is recalculated using Defra's latest Air Quality Damage Cost Toolkit (available at: <https://www.gov.uk/government/publications/assess-air-quality-impacts>). In accordance with Sussex Air's Air Quality Guidance, the central present value should be used when calculating damage costs, rather than the low-sensitivity present value, as this provides the preferred basis for determining appropriate mitigation.

The Sussex Air Guidance takes a low-emission strategies' approach to avoid health impacts of cumulative development, by seeking to mitigate or offset emissions from the additional traffic and buildings. It is recommended that the emission mitigation statement contain itemised costing for each proposed mitigation option and total value of all proposed emissions' mitigation. This should be equal to the value from Emissions calculation and total calculated value of emissions' health damage cost.

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 contribution to measures included in our Annual Status Report such as Walking and Cycling Measures to promote Travel alternatives in line with

- a. West Sussex Active Travel Strategy
- b. Horsham's Local Cycling and Walking Infrastructure Plan
- c. Horsham District Council Infrastructure Delivery Plan

An Interim Planning Guidance on the consideration of the Environmental Act Pm2.5 target in planning decisions was published in October 2024. Applicants are advised to 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.

1. How has exposure to PM2.5 been considered when selecting the development site? Applicants are advised to consider the following in their application:
 - Site proximity to people (particularly large populations and/or vulnerable groups, e.g. schools, hospitals, care homes, areas of deprivation) and the impact of the development on these,

• Site proximity to pollution sources and the impact of these on users of the development, • Exposure and emissions during both construction and in-use. 2. What actions and/or mitigations have been considered to reduce PM2.5 exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of PM2.5 and its precursors? Applicants are advised to explain (with evidence where possible) why each measure was implemented. Or, if no mitigation measures have been implemented, why this was not proposed. Actions can refer to, but are not limited to, the following: • Site layout, • The development's design, • Technology used in the construction or installed for use in the development, • Construction and future use of the development.	
ANY RECOMMENDED CONDITIONS: N/A at this time, more information required.	
NAME:	Isabelle Carter
DEPARTMENT:	Environmental Health and Licensing
DATE:	10/08/2026