HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Hyatts Yard Thistleworth Farm Grinders Lane Dial Post RH13 8NR
DESCRIPTION:	Mixed use of site for waste operations and independent Open storage use (Use Class B8) (Retrospective).
REFERENCE:	DC/26/1353
RECOMMENDATION:	Advice / No Objection / Objection / **More Information** / Modification / Refusal

SUMMARY OF COMMENTS & RECOMMENDATION:

The submitted Air Quality Assessment has been reviewed. Further information and clarification are required before we can conclude that the air quality impacts of the development have been adequately assessed and mitigated.

The assessment should be revised with regard to the current Interim Air Quality and Emissions Mitigation Guidance for Sussex (2026), relevant IAQM guidance, current LAQM Technical Guidance and Defra's *$PM_{2.5}$ Targets: Interim Planning Guidance*.

MAIN COMMENTS:

1. Development description and operational emissions

The assessment does not provide sufficient quantitative information on the proposed operation to establish the change in emissions relative to the existing/baseline use.

The report states that the number and type of vehicles are not expected to increase, but supporting information is not provided. The assessment should therefore clearly set out:

- existing and proposed daily vehicle movements, including HGV movements;
- vehicle types and, where available, emission standards;
- the type and number of on-site plant and non-road mobile machinery (NRMM);
- the nature and quantities of materials/waste to be handled and stored; and
- the expected use and throughput of the proposed mobile crusher.

2. Environmental permitting

The proposal includes the operation of a mobile crusher. The applicant should confirm whether this activity falls within the scope of the Environmental Permitting regime, having regard to Defra's *Process Guidance Note 3/16 – Mobile Crushing and Screening*, and provide details of any existing or required Environmental Permit. This should also be reflected in the assessment of operational particulate emissions and associated mitigation.

3. $PM_{2.5}$

The assessment identifies $PM_{2.5}$ as a relevant pollutant but does not assess the development against Defra's *$PM_{2.5}$ Targets: Interim Planning Guidance*.

The assessment should identify the sources of primary $PM_{2.5}$ and relevant precursor emissions associated with the development and demonstrate how emissions have been minimised as far as reasonably practicable.

4. Baseline NO_2 monitoring and annualisation

The site-specific NO_2 monitoring was undertaken for only four weeks, from 20 August to 24 September 2026. The assessment then annualises these results and relies upon them when concluding that NO_2 concentrations are well below the annual mean objective.

This approach does not comply with LAQM.TG22, which states at paragraph 7.198 that a minimum of three months' monitoring is required for annualisation to be completed. The monitoring period undertaken at the site is therefore insufficient for annualization and should not be relied upon.

The assessment should therefore provide an appropriate baseline based on monitoring/data that meet the requirements of LAQM.TG22 and revise the assessment and conclusions accordingly.

The report should also be updated where it refers to TG16, which has been superseded.

5. Use of 2026 monitoring data

Section 3.4 describes 2026 monitoring results as "ratified and bias adjusted" and section 3.5 concludes that there were no exceedances in 2026. The assessment should distinguish between provisional/current-year monitoring and ratified annual datasets and avoid drawing annual compliance conclusions from an incomplete year.

6. Dust and PM_{10}

A formal dust assessment should be undertaken in accordance with the current IAQM Guidance on the assessment of dust from demolition and construction, taking account of the potential for dust and PM_{10} emissions from relevant activities, including crushing,

material handling, stockpiles and vehicle movements. The assessment should identify relevant sensitive receptors and determine the appropriate dust risk and site-specific mitigation.

A Dust Management Plan (DMP) should be provided and/or secured, setting out site-specific mitigation measures proportionate to the assessed dust risk and in line with relevant IAQM guidance. The DMP should also include contingency measures for periods of adverse or extreme weather, including prolonged dry and/or windy conditions, irrespective of the time of year.

7. Damage-cost assessment and emissions mitigation

The number of additional vehicle movements associated with the proposal should be quantified. This information should then be used to undertake the required emissions and damage cost assessment, with appropriate mitigation identified in accordance with the relevant Sussex Air guidance. The Emissions Mitigation Statement should identify and cost the proposed mitigation measures, with the overall mitigation package proportionate to the calculated emissions damage cost.

NAME:	Thais Delboni
DEPARTMENT:	Environmental Health
DATE:	13 November 2026