



Horsham  
District  
Council

## HORSHAM DISTRICT COUNCIL CONSULTATION

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| <b>TO:</b>                                                                                                                                                | Development Control                                                                                                                                   |
| <b>FROM:</b>                                                                                                                                              | Environmental Health and Licensing                                                                                                                    |
| <b>REFERENCE:</b>                                                                                                                                         | DC/26/0530                                                                                                                                            |
| <b>LOCATION:</b>                                                                                                                                          | Land at Hornbrook Farm Brighton Road West Sussex                                                                                                      |
| <b>DESCRIPTION:</b>                                                                                                                                       | Outline planning application for up to 180 dwellings, open space and associated works and infrastructure with all matters reserved apart from access. |
| <b>RECOMMENDATION:</b>                                                                                                                                    | <del>Advice / No Objection / Objection / More Information / Modification / Refusal</del>                                                              |
| <b>SUMMARY OF COMMENTS &amp; RECOMMENDATION:</b><br>Comments relating to below information:<br>Air Quality Assessment by Cass Allen dated 15 January 2026 |                                                                                                                                                       |

## **MAIN COMMENTS:**

### **Damage cost calculations**

Thank you for submitting the damage cost calculations. I have independently run the Emissions Factor Toolkit (EFT) and can confirm that my outputs are consistent; however, the damage costs derived differ from those presented within the assessment.

However, I require clarification regarding the methodology applied in deriving the damage costs. Firstly, the applicant is requested to justify the use of the "Urban Small" classification within the calculations, given that Horsham has a population exceeding 50,000, which would typically suggest a different categorisation.

Secondly, clarification is sought in relation to the statement in paragraph 10.2: "This accounts for a 2% uplift per year to reflect a higher willingness to pay for health." The meaning and basis of this statement are unclear, as this approach is not recognised within standard damage cost methodologies. Furthermore, under standard practice, damage costs are generally expected to decrease over the assessed five-year period; however, the submitted assessment indicates an increasing trend. An explanation for this deviation would therefore be helpful.

Notwithstanding the above points, the total damage cost of £41,148.71 is broadly consistent with my own calculations. On this basis, this figure may be accepted, should the applicant choose to proceed with it, with the understanding that the methodology employed does not align with standard practice.

### **PM2.5**

The report does not adequately address the questions around PM2.5 targets outlined in the interim planning guidance.

These are:

#### **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.

Planning Authorities are encouraged to consider the cumulative impact of development both in developing their Local Plan and when making decisions on a case-by-case basis. Whilst contributions from individual developments may be small, cumulatively they can lead to an increase in regional exposure, and so will have public health impacts and affect progress towards the targets.

### **SUGGESTED CONDITIONS**

**Pre-Commencement 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. 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.

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).

**Pre-Commencement Condition:** Prior to the commencement of the development, a detailed mitigation strategy establishing the on-site measures to improve air quality at both the operational and construction phases shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall be written in accordance with the Council's Planning Advice Document: Air Quality & Emissions Reduction Guidance (2021), and shall detail the calculated damage costs that will be spent on practical mitigation measures. The approved detail within the strategy shall thereafter be strictly adhered to unless otherwise agreed 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).

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| <b>NAME:</b>       | Georgina Hermitage                 |
| <b>DEPARTMENT:</b> | Environmental Health and Licensing |

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| <b>DATE:</b> | 12/11/2024 |
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