



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 approximately 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: Environmental Air Quality Assessment, dated 18 th February 2026 and prepared by Quantum Air	

MAIN COMMENTS:

Environmental Health has reviewed the Air Quality Assessment and we have the below comments:

The applicant's conclusion that a detailed air quality assessment is not required, based solely on the site being outside an AQMA and below EPUK/IAQM screening thresholds (paragraph 8.5), is not considered sufficient justification in this case. Horsham District Council's own guidance requires developments to assess and quantify air quality impacts and consider cumulative effects. A scheme of 24 dwellings constitutes a major development that will generate additional traffic and introduce new receptors, and therefore requires a proportionate assessment to demonstrate compliance with Local Plan air quality policy. In the absence of such assessment, no evidence has been provided on impacts, damage costs, or appropriate mitigation, and it has not been demonstrated that the development would be acceptable in air quality terms. A development of this size does not require modelling.

Whilst the assessment considers the impact of the proposed development on local air quality, it fails to adequately assess the impact of existing nearby sources on future residents, which is a key requirement of planning policy, notably the brickworks located approximately 250 m from the site. No data has been provided on dust, fine particulate emissions, or odour from this industrial use. Although such operations are regulated by the council, controls do not eliminate emissions entirely and residual dust, odour and associated impacts may adversely affect residential amenity. Paragraph 7.17 refers to a background PM₁₀ concentration of 11.4 µg/m³, however reliance on generic background data does not constitute an assessment of site suitability. The AQA should therefore be expanded to consider emissions, including dust and odour, from the brickworks, verify baseline conditions, and assess potential exposure of future residents, with mitigation identified where necessary.

The Air Quality Assessment does not address the DEFRA guidance on PM_{2.5} in planning (PM_{2.5} targets and local authority questions), which is now a key policy requirement following the Environment Act 2021 and the introduction of legally binding PM_{2.5} targets. In particular, the assessment fails to consider whether the development would increase population exposure to fine particulate matter, introduce new sensitive receptors in proximity to existing sources (including the nearby brickworks), or incorporate design and mitigation measures to minimise exposure.

The report relies solely on background PM_{2.5} concentrations and compliance with current objectives, which does not reflect the intent of current national policy to reduce population exposure, rather than simply demonstrate compliance. No assessment has been undertaken of site suitability in terms of PM_{2.5} exposure, nor have any mitigation measures been proposed to address this.

The AQA should therefore be updated to respond to DEFRA's PM_{2.5} planning guidance, including:

- consideration of existing sources and exposure pathways,
- assessment of potential changes in population exposure, and
- identification of appropriate mitigation and design measures to minimise exposure for future residents.

Without this, it has not been adequately demonstrated that the development is acceptable in air quality terms or consistent with national policy objectives on PM_{2.5}

reduction. This is particularly important given the proximity of industrial sources and the increasing policy emphasis on protecting public health from fine particulates.

The construction dust assessment generally follows IAQM (2024) methodology and appropriately identifies dust emission magnitudes and receptor sensitivity, concluding a medium risk for dust soiling impacts during construction and trackout. A comprehensive suite of standard mitigation measures is listed, and the report correctly recommends that these should be secured through a Dust Management Plan (DMP), potentially incorporated within a CEMP. This approach is broadly acceptable..

However, there are notable shortcomings. The assessment relies heavily on generic background PM₁₀ concentrations (11.4 µg/m³) to justify a "low" human health risk and to conclude that no further mitigation is required. This is not consistent with IAQM guidance, which requires risk to be driven by construction activity and receptor sensitivity rather than background concentrations alone. The assessment also does not consider interaction with nearby industrial sources (e.g. the brickworks) during the construction phase, which could increase cumulative dust exposure at receptors.

Overall, whilst the proposed mitigation measures are appropriate, the assessment underplays potential impacts and lacks sufficient site-specific detail. It is therefore recommended that a robust, site-specific CEMP (including a detailed DMP, monitoring strategy, and construction traffic management measures) is secured by condition to ensure effective control of dust and particulate emissions throughout the construction phase.

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).

NAME:	Georgina Hermitage
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DEPARTMENT:	Environmental Health and Licensing
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DATE:	28/05/2026
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