From: John.Griffiths
Sent: 13 May 2025 11:27
To: Planning
Subject: Your Ref: DC/25/0676; RE: Fireaway, 37 East Street Horsham West Sussex RH12 1HR
Attachments: DM Consultation Extract Odour RA Form (DC-25-0676)(13-05-25).pdf

Categories: Consultations

Dear Planning,

I write further to the above consultation and respond on behalf of HDC Environmental Health & Licensing Commercial Team. The Application seeks retrospective permission to regularise the existing restaurant and takeaway use at the premises, including the previously installed kitchen extract flue to the rear.

In relation to the extract installation, my comments are considered using the principles laid out in the NETCEN/EMAQ+ 'Guidance of Odour and Noise from Commercial Kitchen Exhaust Systems', referred to in this consultation as 'the Guidance'.

The premises is located towards the edge of the commercial town centre of Horsham, although it is surrounded by domestic properties at first floor level and greater, including above the premises itself and immediately adjacent to the rear in Park Place, the closest being within 6 metres of the extract stack termination. Numerous dwellings are also located within 25 metres to the northwest at Parkway House, highlighted to be in line with the local prevailing wind.

It is pleasing to note that the Applicant has applied the Appendix 3 risk assessment from the Guidance to assess the odour risk from the development, although this Service disagrees with the variables used and related outcomes:

This Services' application of the Guidance's risk assessment for odour indicates that a 'High level' of odour control will be appropriate, suggesting that an effective system would include fine filtration or ESP following by activated carbon filtration rated with at least 0.2 to 0.4 second residence- or 'dwell time', or a system offering equivalent control. It is noted that the proposed design does not meet this standard, offering only passive dispersion to control odours and lacking any active odour abatement techniques being proposed. A copy of this assessment is attached for the applicant's reference.

To this end, this Service OBJECTS to the Application due to the potential for cooking odours to cause a loss of amenity to neighbouring domestic properties and the therefore the design should be modified to incorporate effective active odour control techniques.

Given the proximity of sensitive domestic dwellings close to the application site, this Service holds concern regarding the potential for noise breakout from the premises causing disturbance. Foreseeable sources of noise include operation of the kitchen extract-ventilation system; arrival and departing of home-delivery vehicles collecting orders; and general operational noise from the business itself. To this end, the business should submit a noise management plan detailing the procedures that will be used to control such disturbance, with a view to securing these by Condition for the duration of the development's operation, should the Application be Permitted.

Additionally, specifically in relation to the kitchen extract-ventilation system, this Service recommends that an assessment of the acoustic impact arising from the operation of the plant is to be submitted to and approved in writing by the local planning authority. The assessment of the acoustic impact shall be undertaken in accordance with BS 4142: 2014 (or subsequent superseding equivalent) and other relevant measures and shall include a scheme of attenuation measures to ensure the cumulative noise rating level emitted from the site is 5 dBA less than background. Any additional steps required to mitigate the noise impact shall be identified and implemented within 3 months of the undertaking of the assessment. This is to be secured by Condition, should the Application be Permitted.

If there is anything in this email that you do not understand, or if you have any other questions or queries, please do not hesitate to contact this Service or myself directly.

Kind regards.

John Griffiths
Area Environmental Health Officer

[redacted]

Horsham District Council

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DM REF:	DC/25/0676
DATE:	12/05/2025
EH&L:	JG

Risk Assessment for Oil, Grease, Smoke & Odour from Commercial Kitchens

In 2018 the withdrawn guidance issued by the Department for Environment, Food and Rural Affairs titled 'Guidance of Odour and Noise from Commercial Kitchen Exhaust Systems' was replaced with industry-lead update of the same name. While the majority of the document mirrored what had been issued previously, the new guidance included additional consideration and a revised risk assessment for odour impact from proposed installations utilising cooking techniques and methods not previously covered.

Below is the Risk Assessment table which is used nationally by Development and Environmental Health team to assess the expected impact of food business on the amenity of neighbouring domestic and sensitive properties. The completed assessment must be read in conjunction with the full NETCEN/EMAQ+ Guidance document, particularly page vi of the preface, as well as the additional Horsham DC guidance document 'Information Required to Support a Planning Application for Commercial Kitchen Ventilation Systems'.

Appendix 3 Risk Assessment

Criteria and Condition	*Description of Circumstances*	*Score*
Dispersion	*Efficiency of the stack design to naturally dilute odour molecules before they reach sensitive receptors*	
Very Poor	Low level discharge into courtyard or restriction on stack	~~20~~
Poor	Not low level, but below eves or discharge at below 10m/s	~~15~~
Moderate	Discharging 1 metre above eves at 10-15m/s	**10**
Good	Discharging 1 metre above ridge at 15m/s	~~5~~
Proximity of Receptors	*Sensitive receptors are potentially subject to a greater impact the closer they are*	
Close	Closest sensitive receptor less than 20 metres from extract discharge	**10**
Medium	Closest sensitive receptor between 20 and 100 metres from extract discharge	~~5~~
Far	Closest sensitive receptor more than 100 metres from extract discharge	~~1~~
Size of Kitchen	*A larger kitchen will increase the amount of odour molecules requiring control*	
Large	More than 100 covers or large sized takeaway	~~5~~
Medium	Between 30 and 100 covers for medium sized takeaway	**3**
Small	Less than 30 covers or small sized takeaway	~~1~~
Cooking Type	*Some cuisines pose a greater potential for odour disturbance, particularly those high in grease*	
Very High	Pubs with high level of fried food; fired chicken; burgers; fish & chips; Turkish or kebabs; Middle Eastern; or any premises cooking with solid fuel.	~~10~~
High	Vietnamese; Thai; Indian; Japanese; Chinese cuisines	~~7~~
Medium	Cantonese; Italian; French; Pizza from gas-fired ovens	~~4~~
Low	Most pubs (no fried food, mainly reheating and sandwiches, etc); Tea rooms	**1**

Score Range	*Impact Risk*	*Odour Control Required*	**Total Score**
~~Less than 20~~	~~Low to Medium~~	~~Low level odour control~~	**24**
20 to 35	High	High level odour control	
~~More than 35~~	~~Very High~~	~~Very high level odour control~~	

Executive Summary from the Guidance

Objectives for Odour Control

- For new premises or premises covered by planning conditions restricting the impact of odour the system shall be designed to prevent harm to the amenity.
- For existing premises not covered by planning conditions restricting the impact of odour, the system shall be designed to avoid statutory nuisance and shall comply with the principles of Best Practical Means.
- The design of a control system should recognise that there are two phases of the contamination in a kitchen exhaust: Particulate (grease, smoke, hydrocarbons/VOC) and Gaseous (odour). The particulate phase needs to be removed prior to dealing with the gaseous phase.

To achieve these objective the odour control system shall include an adequate level of:

1. Particulate and odour control; and
2. Stack dispersion.

The overall performance of the odour abatement system will represent a balance of 1 and 2.

Discharge stack

The discharge stack shall:

1. Discharge the extracted air not less than 1 m above the roof ridge of any building within 15 metres of the vent serving the commercial kitchen. Additional odour control measures may still be required depending on the cooking type and frequency
2. If 1 cannot be complied with for planning reasons, then the extracted air shall be discharged not less than 1 m above the roof eaves or dormer window of the building housing the commercial kitchen. Additional odour control measures may be required. A higher level of odour control measures than those required in Part 1 above may be required.
3. If 1 or 2 cannot be complied with for planning reasons, then a higher level of odour control measures than those required in Part 1 or 2 above may be required.

Odour arrestment plant performance (relation to *Impact Risk* taken from the Assessment)

~~*Low to medium level control may include:*~~

1. ~~Fine filtration or ESP following by carbon filtration (carbon filters rated with a 0.1 second residence time).~~
2. ~~Fine filtration followed by counteractant/neutralising system to achieve the same level of control as 1.~~

High level odour control may include:

1. Fine filtration or ESP followed by carbon filtration (carbon filters rated with a 0.2-0.4 second residence time).
2. Fine filtration or ESP followed by UV ozone system to achieve the same level of control as 1.

~~*Very high level odour control may include:*~~

1. ~~Fine filtration or ESP followed by carbon filtration (carbon filters rated with a 0.4 –0.8 second residence time).~~
2. ~~Fine filtration or ESP followed by carbon filtration and by counteractant/neutralising system to achieve the same level of control as 1.~~
3. ~~Fine filtration or ESP followed by UV ozone system to achieve the same level of control as 1.~~
4. ~~Fine filtration or ESP followed by wet scrubbing to achieve the same level of control as 1.~~

In some instances, where very high levels of control are required, combinations or sacrificial levels of filtrations may be employed.

Maintenance must be carried out to ensure these performance levels are always achieved.

Additional matters

The above relates to odour control only and additional consideration to the acoustic impact of an installation will also likely be required. Please see the Guidance for more information.