



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DC/26/0826
LOCATION:	Toat Café, Stane Street, North Heath, West Sussex, RH20 1DN
DESCRIPTION:	Outline Planning Application for up to 93 residential dwellings (including 35% affordable), pharmacy, shop/cafe and open space, all matters reserved except access.
RECOMMENDATION:	Further information required

MAIN COMMENTS:

Noise

An Environmental Health Officer has recently visited the application site and road traffic noise from the heavily trafficked A29, located in close proximity to the site's south eastern boundary, was very noticeable. We also note that the proposals include commercial on-site sources of noise in the form of shop/café which we assume will have fixed plant installed and will need to be serviced by delivery vehicles.

Where this is the case and residential development is proposed in close proximity to a predominant source of noise and include on-site sources of noise we would reasonably expect the application to be supported by a noise impact assessment which quantifies and assesses the impact of noise on residential amenity and, crucially, provides the LPA with confidence that noise levels, both internally and in proposed amenity spaces, are capable of being mitigated through conditions.

A report of the nature has not however been submitted with the proposals – it has therefore not been adequately demonstrated that noise will not give rise to adverse impacts on the amenity of future occupants of the proposed dwellings.

In addition to the above, given the close proximity of the A29 it is our expectation that the layout of the development is designed in accordance with ProPG: Planning & Noise. In particular that the dwellings have appropriate layout, both internally and externally, with amenity spaces suitably screened and bedrooms/living rooms not overlooking the A29. From reviewing the proposed layout we are however not entirely convinced that the layout as currently proposed presents good acoustic design as detailed in ProPG.

We will be able to provide further comment on the proposed layout once the above-mentioned noise assessment has been undertaken.

Air Quality

It is expected that additional traffic from the proposed development will impact Pulborough. Although no AQMA has been declared, the area is of increasing concern as NO₂ concentrations close to 40 µg/m³ have been recorded at Church Hill/London Road. Consideration should also be given to the site's proximity to the Storrington AQMA, including the effects of any additional traffic.

This proposal is classified as a major development; therefore, the applicant must submit an Air Quality Assessment and an Emissions Mitigation Statement, including a damage cost calculation. Mitigation measures for the proposed development should align with the Sussex Air (2021) *Air Quality and Emissions Mitigation Guidance for Sussex*.

This guidance adopts a low-emission strategy approach to minimise the health impacts of cumulative development by requiring mitigation or offsetting of emissions from additional traffic and building. The Emissions Mitigation Statement should provide an itemised cost for each proposed mitigation measure, along with the total cost of all measures. This total should be equal to the calculated emissions damage cost.

The Sussex Air Quality Guidance is intended to avoid duplication of mitigation measures that are already required under other regulatory regimes. In addition, applicants must include an Assessment of Dust from Demolition and Construction in accordance with the guidance.

The assessment should be transparent, clearly documenting all input data, assumptions, and methodologies used (either within the main report or appendices). Full statistical analysis should also be provided to demonstrate model performance.

Applicants should liaise with the relevant planning authority to identify any other developments that need to be included in a cumulative impact assessment.

For major applications, it is recommended that applicants supplement local authority monitoring with site-specific monitoring to improve model accuracy and confidence in the results.

Additionally, in line with the Interim Planning Guidance published in October 2024 on the Environmental Act PM2.5 target, applicants should demonstrate that they have identified key sources of air pollution within the development and have taken all reasonably practicable measures to minimise emissions of PM2.5 and its precursors.

Land Contamination

We have reviewed the Ashdown Preliminary Ground Contamination Risk Assessment Report, dated 14.05.26, and given the land use history the fact that a contamination assessment has been provided in support of the application is welcomed. We do however have the following initial comments to make:

1. We note that section 5 makes reference to an Albury S.I. Ltd 'Report on a Site Investigation'. We would be grateful if a copy of this report can be provided.
2. The information provided on pages 38 and 39 of Part 1 is illegible.
3. The information titled 'Part 2' and 'Part 3' would appear to be the same 102 page document. It would appear that the document containing the historic maps is missing.

We will have further comments to make, in the first instance we would however be grateful if the Albury SI report and the correct information in the appendices can be provided.

Construction Phase

During site clearance, preparation and construction there is the potential for local residents to experience adverse impacts from noise, dust and construction traffic movements. These should be minimised and controlled by the developer and a construction environmental management (CEMP) plan will be recommended as a condition, once we are happy that the above matters have been addressed.

Summary

Given the above we are of the view that the application is currently insufficiently detailed to be determined.

Suggested Conditions

N/A

NAME:	Kevin Beer
DEPARTMENT:	Environmental Health and Licensing
DATE:	03/08/2026