



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land Off Old Crawley Road Faygate West Sussex
DESCRIPTION:	Outline Application for a development of up to 120 dwellings (including 45% affordable) with all matters reserved except for access
REFERENCE:	DC/26/0671
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: We have reviewed the January-2026 Planning Stage Air Quality Assessment, produced by Anderson Acoustics, and have the following comments to make.	

MAIN COMMENTS:

The assessment should have considered the Albion Way monitoring location (Horsham 12). The additional vehicle movements associated with the development are likely to affect pollutant concentrations at this location, as it serves as a key access point to the main shops and the town centre.

PM2.5 Targets

An Interim Planning Guidance on the consideration of the Environmental Act Pm2.5 target in planning decisions was published in October 2024. Applicants are advised to provide evidence in their planning applications that they have identified key sources of air pollution within their schemes and taken appropriate action to minimise emissions of PM2.5 and its precursors as far as is reasonably practicable.

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.

Damage Cost Calculation

The use of low damage cost values is not acceptable, as this is not consistent with the guidance. The central present value for NOx and PM2.5 should be used, in line with the Sussex Air Quality Guidance.

Damage costs should be calculated using the Defra damage cost toolkit (available at <https://www.gov.uk/government/publications/assess-air-quality-impacts>) to ensure that damage cost values are converted to the relevant appraisal year prices. A price base of 2026 should be applied, and the total damage cost should be calculated over a five-year period from 2030 to 2034.

Emissions Mitigation Plan

The Sussex Air Quality Guidance takes a low-emission strategies' approach to avoid health impacts of cumulative development, by seeking to mitigate or offset emissions from the additional traffic and buildings. It is recommended that the emission mitigation statement contain itemised costing for each proposed mitigation option and total value of all proposed emissions' mitigation. This should be equal to the value from Emissions calculation and total calculated value of emissions' health damage cost.

Regarding the measures to be put forward in the air quality mitigation plan we would request that the applicant avoids duplication of measures that would normally be required through other regimes. As the Approved Document S is now in force, we would not recommend including charging points in the mitigation plan unless those were offsite, to support the EV Charging Network and Delivery Plans for the local area. Similarly, we would not support cycle parking and shelters as this is already an expectation of the LTP/HDC cycling strategies and related policies. Instead, we would highly recommend contribution to measures included in our Annual Status Report such as Walking and Cycling Measures to promote Travel alternatives in line with

- a. West Sussex Active Travel Strategy
- b. Horsham's Local Cycling and Walking Infrastructure Plan
- c. Horsham District Council Infrastructure Delivery Plan

CEMP and DMP

Consideration should be given to the IAQM guidance note regarding the use of Use of Low-Cost Sensor Systems for PM10 in the Vicinity of Demolition and Construction Sites and Considerations of PAS 4023:2023 published in September 2025.

Further information is required regarding the NRMM equipment standards.

ANY RECOMMENDED CONDITIONS:

A condition to secure an Emission Mitigation Statement will be applied; however, confirmation of the total damage cost value is required first.

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.

NAME:	Thais Delboni
DEPARTMENT:	Environmental Health
DATE:	01 June 2026