



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Rock Common Quarry The Hollow Washington
DESCRIPTION:	Discharge of condition 10 (Dust Management Plan) and 14 (Air Quality Protection) of Planning Permission WSCC/028/21
REFERENCE:	NC/26/0023
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: WSCC application number: WSCC/028/21/DIS1 and WSCC/028/21/DIS4 Comments relating to below information: Traffic Management Plan dated 12 June 2026 (dowsettmayhew) Technical Note Air Quality dated 12 February 2026 (RWDI) Dust Management Plan dated 15 June 2026 (RWDI)	
MAIN COMMENTS: Traffic Management Plan - WSCC/028/21/DIS1 Although Air Quality has not been formally consulted on this discharge application, given the site's proximity to the Storrington AQMA, the potential air quality impacts, and the anticipated volume and nature of vehicle movements associated with the development, further information is requested regarding the TMP. The submitted TMP does not currently make any reference to the Storrington AQMA. Further clarification is required to confirm whether development-related traffic, particularly HGVs, is expected to travel through the Storrington AQMA. If so, details should be provided on the anticipated number of vehicle movements, together with any measures proposed to minimise air quality impacts. This should include information on how HGVs will be directed to use designated routes and how compliance with routing restrictions will be monitored and enforced. It is also noted that the <i>Regulation 25 Additional Information</i> document submitted in 2022 stated that: <i>This is an appropriate point to refer to the management and monitoring of HGV movements associated with the proposed development. All trucks will be fitted with "real time", GPS vehicle tracking devices. Vehicle tracking by GPS works using a global positioning system enabling users to monitor vehicles relative to their geographical location. This information will enable the quarry operator to</i>	

manage and monitor vehicle movements to ensure, for example, compliance with any routing agreements/restrictions that might be associated with the grant of any planning permission.

In addition, all haulage companies and individual drivers either delivering to, or departing from, the site will be issued with full details of any routing restrictions and will be required to acknowledge that such directions have been received and understood. Penalties will apply should haulage companies fail to follow these directions, including companies being banned from the development.

However, the submitted TMP does not appear to include these commitments or explain how vehicle routing requirements will be monitored and enforced in practice.

Technical Note – Air Quality

We acknowledge that Condition 14 of the decision notice requires a damage cost contribution of at least £14,938, as agreed through the planning permission. However, this figure was calculated in December 2020 based on an AADT of 236 vehicle movements for the first five years of operation (2022-2026) and using damage cost values per tonne of pollutant derived from 2017 guidance.

Given the age of the assessment and the subsequent changes in damage cost valuations, it is considered that the approved figure may no longer accurately reflect the current impacts of the development. The final damage cost calculation is therefore unlikely to represent present-day conditions, and the equivalent value would be expected to be higher if recalculated using current methodology and damage cost factors. We would therefore request that the damage cost assessment is reviewed and updated using the latest available guidance and valuation data.

Further clarification is also requested regarding the mitigation measures proposed to address operational emissions. The proposed replacement of diesel dump trucks with fully electric-powered field conveyors appears to be a measure that is already required to address highway safety and local amenity considerations and therefore should not be relied upon as additional air quality mitigation.

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. Instead, we would strongly support improvements and connectivity to the existing walking and cycling and public transport networks, as these are likely to deliver greater benefits for sustainable travel and access to employment, services, and local facilities.

The proposed mitigation measures should also have regard to:

- Horsham Air Quality Action Plan;
- Horsham Annual Status Reports and associated measures;
- Horsham Local Cycling and Walking Infrastructure Plan (LCWIP);
- West Sussex Active Travel Strategy; and
- DfT Connectivity Tool.

Where mitigation is not integrated into a proposed development, the LPA may require this through relevant planning conditions or Section 106 agreement

Dust Management Plan

Meteorological Data

Whilst Shoreham is closer to the site, further justification is required for its use as the representative meteorological station. As the assessment considers source contributions,

representative local wind conditions are important. Shoreham's coastal location is influenced by sea breezes which may limit its representativeness of conditions at the site.

PM Monitoring

Please clarify what real-time PM monitoring equipment and methodology will be used during the operational phase of the site.

Any automatic particulate monitoring survey should be designed to identify potential elevated PM₁₀ concentrations and be demonstrably fit for purpose in the context of mineral site monitoring.

Whilst the desk-based assessment provides useful background information, baseline monitoring should be undertaken at least three months before works commence to establish site-specific conditions and enable assessment of the effectiveness of dust mitigation measures.

Extreme Events

Extreme weather conditions are becoming increasingly frequent and severe, including heatwaves, prolonged dry periods, and drought conditions. These events have the potential to increase dust generation, exacerbate off-site impacts, and reduce the effectiveness of standard dust suppression measures.

The DMP should therefore identify contingency measures to be implemented during periods of extreme weather, setting out how dust emissions will be monitored, managed, and controlled under such conditions. Incorporating these scenarios into the DMP will help ensure the continued effectiveness of dust mitigation measures, maintain compliance with relevant requirements, and improve the resilience of site operations to changing climatic conditions.

NAME:	Thais Delboni
DEPARTMENT:	Environmental Health
DATE:	13 Aug. 26