



# Air Quality Assessment

8 Shooting Field, Steyning, West Sussex BN44 3RX

Steyning Grammar School

10 June 2026

| Project Information  |                         |
|----------------------|-------------------------|
| <b>Title</b>         | Air Quality Assessment  |
| <b>Job Code</b>      | 92382                   |
| <b>Sector</b>        | Environment             |
| <b>Report</b>        | AQA                     |
| <b>Client</b>        | Steyning Grammar School |
| <b>Revision</b>      | C                       |
| <b>Status</b>        | Final                   |
| <b>Date of Issue</b> | 10 June 2026            |

| Revision History |              |        |          |          |        |
|------------------|--------------|--------|----------|----------|--------|
| Revision         | Date         | Author | Reviewer | Approver | Status |
| C                | 10 June 2026 | MP     | AP       | SC       | Final  |
|                  |              |        |          |          |        |

#### Disclaimer

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party. This report may include data obtained from trusted third-party consultants/laboratories that have been supplied to us in good faith. Whilst we do everything, we can to ensure the quality of all the data we use, we cannot be held responsible for the accuracy or integrity of third party data.

## Executive Summary

AVAL Consulting Group Limited was commissioned to undertake an Air Quality Assessment (AQA) in support of the planning application for the educational development at 8 Shooting Field, Steyning, West Sussex BN44 3RX. This accompanies the Planning Application to the Local Authority, the Horsham District Council (HDC) for consent to undertake the proposed work at the site.

This report addresses potential air quality impacts associated with the proposed development from construction and earthworks in accordance with the Institute of Air Quality Management (IAQM) guidance on assessing impacts from demolition, construction and operational phases.

The qualitative assessment of construction dust effects has been undertaken for the proposed scheme. The construction stage is predicted to have a 'High Risk' of nuisance and/or loss of amenity impacts due to dust nuisance. However, the risk of dust nuisance can be mitigated by implementing the appropriate mitigation measures listed in the Institute of Air Quality Management (IAQM) guidance in Appendix D.

A detailed road traffic emissions assessment was undertaken to consider the impact of the development-generated road traffic emissions on local air quality at identified existing receptor locations using the dispersion model ADMS Roads for annual mean concentrations of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>). The modelling assessment was undertaken in accordance with Defra Local Air Quality Management Technical Guidance (TG22). In accordance with IAQM/EPUK guidance, the modelled development impacts were not predicted to result in any exceedances of the relevant air quality objectives and were predicted to have a 'negligible' impact for the NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> annual means to the existing air quality.

An emissions mitigation assessment has been carried out in line with Sussex Air guidance, including a damage cost calculation, and this found that approximately £60,690 is required to be spent on mitigation to offset the transport impact of the development. The client has committed to installing £600k worth of PV solar panels, a ground Source Heat Pump valued at £1.2m and 53 EV charging spaces, 18 active and 35 passive, into the development.

In conclusion, with proper mitigation measures in place, the proposed development at 8 Shooting Field, Steyning is not considered to conflict with any national, regional, or local planning policy in relation to construction and operation stage dust and air quality nuisance and is considered suitable for an educational development.

## Table of Contents

|        |                                                                         |    |
|--------|-------------------------------------------------------------------------|----|
| 1      | Introduction                                                            | 1  |
| 1.1    | Overview                                                                | 1  |
| 1.2    | Objective                                                               | 1  |
| 1.3    | Site Location                                                           | 2  |
| 1.4    | Key Pollutants                                                          | 2  |
| 2      | Legislation and Policy                                                  | 3  |
| 2.1    | European Union                                                          | 3  |
| 2.2    | National Level - England                                                | 3  |
| 2.2.1  | National Planning Policy Framework                                      | 4  |
| 2.2.2  | Relevant National Planning Practice Guidance                            | 5  |
| 2.2.3  | Statutory Nuisance                                                      | 6  |
| 2.2.4  | Relevant National Air Quality Standards                                 | 6  |
| 2.3    | Local Level – Horsham District Council                                  | 8  |
| 2.3.1  | Horsham District Planning Framework (November 2015)                     | 8  |
| 2.3.2  | Air Quality and Emissions Mitigation Guidance for Sussex (Adopted 2021) | 8  |
| 3      | Methodology                                                             | 9  |
| 3.1    | Overview                                                                | 9  |
| 3.2    | Scope of the Assessment                                                 | 9  |
| 3.2.1  | Construction Dust Assessment                                            | 9  |
| 3.2.2  | Operational Impacts                                                     | 10 |
| 3.2.3  | Detailed Air Quality Assessment                                         | 11 |
| 3.2.4  | IAQM/EPUK Assessment of Modelled Impacts                                | 11 |
| 3.2.5  | Modelled Scenarios                                                      | 11 |
| 3.2.6  | Dispersion Model Used                                                   | 12 |
| 3.2.7  | Road Traffic Data                                                       | 12 |
| 3.2.8  | Meteorological Data                                                     | 13 |
| 3.2.9  | Assessment of Background Concentrations                                 | 14 |
| 3.2.10 | Emissions Factors                                                       | 14 |
| 3.2.11 | NO <sub>x</sub> to NO <sub>2</sub> Conversion Method                    | 14 |
| 3.2.12 | Estimating Hourly and Daily Mean Concentrations                         | 14 |
| 3.2.13 | Relevant Sensitive Receptors                                            | 15 |
| 3.2.14 | Model Uncertainties, Assumptions and Limitations                        | 16 |
| 3.2.15 | Damage Cost Calculation                                                 | 17 |
| 4      | Baseline                                                                | 18 |
| 4.1    | UK-AIR Background Pollution                                             | 18 |
| 4.2    | Local Sources of Monitoring Data                                        | 19 |

|     |                                                                                                     |    |
|-----|-----------------------------------------------------------------------------------------------------|----|
| 5   | Potential Impacts                                                                                   | 21 |
| 5.1 | Construction Impacts                                                                                | 21 |
| 5.2 | Site Specific Mitigation                                                                            | 23 |
| 5.3 | Residual Effects                                                                                    | 23 |
| 6   | Operational Impacts                                                                                 | 24 |
| 6.1 | Impact on Local Air Quality                                                                         | 24 |
| 6.2 | Emissions Mitigation Assessment                                                                     | 28 |
| 7   | Discussion                                                                                          | 29 |
| 7.1 | Construction Impacts and Mitigation Measures                                                        | 29 |
| 7.2 | Operational Impacts and Mitigation Measures                                                         | 29 |
|     | 7.2.1 Impact on Annual Mean NO <sub>2</sub> Concentrations                                          | 29 |
|     | 7.2.2 Impacts on Annual Mean PM <sub>10</sub> and PM <sub>2.5</sub> Concentrations                  | 29 |
|     | 7.2.3 Heating Source Impacts and Mitigation Measures                                                | 29 |
| 8   | Conclusion                                                                                          | 30 |
|     | Appendices                                                                                          | 31 |
|     | Appendix A : Key Pollutants                                                                         | 32 |
|     | Appendix B : Operational Impact Assessment Methodology                                              | 33 |
|     | Appendix C : Construction Dust Assessment Criteria                                                  | 36 |
|     | Appendix D : IAQM Highly Recommended Mitigation Measures for Sites with a High Risk of Dust Impacts | 42 |
|     | Appendix E : Model Verification                                                                     | 46 |
|     | E1. Methodology                                                                                     | 46 |
|     | E2. Verification Results                                                                            | 47 |
|     | Appendix F : Site Drawings                                                                          | 48 |

## List of Figures

|                                                                                                               |    |
|---------------------------------------------------------------------------------------------------------------|----|
| <i>Figure 1.1: Proposed site location</i>                                                                     | 2  |
| <i>Figure 3.1: Modelling Network of existing road with Receptors used for ADMS Roads Dispersion Modelling</i> | 13 |
| <i>Figure 3.2: Windrose for Gatwick Meteorological Station 2023-2025</i>                                      | 14 |
| <i>Figure 5.1: Construction assessment buffers</i>                                                            | 21 |

## List of Tables

|                                                                                                          |    |
|----------------------------------------------------------------------------------------------------------|----|
| <i>Table 2.1 : AQO Relevant to the Proposed Development</i>                                              | 6  |
| <i>Table 2.2 : Examples of Where the AQO Should Apply</i>                                                | 7  |
| <i>Table 3.1 : Relevant traffic Data for the Proposed Development</i>                                    | 12 |
| <i>Table 4.1: 2022 to 2024 background concentrations of pollutants at the application site</i>           | 18 |
| <i>Table 4.2: NO<sub>2</sub> Data from Automatic Monitors</i>                                            | 19 |
| <i>Table 4.3: PM<sub>10</sub> and PM<sub>2.5</sub> Data from Automatic Monitors</i>                      | 19 |
| <i>Table 4.4: Monitoring Data from HDC's NO<sub>2</sub> Diffusion Tubes nearest the Application Site</i> | 20 |
| <i>Table 4.5 : Background annual mean concentrations used in this assessment.</i>                        | 20 |

|                                                                                                             |    |
|-------------------------------------------------------------------------------------------------------------|----|
| <i>Table 5.1 : Dust Emission Magnitude for the construction activities, based on the IAQM's guidance</i>    | 22 |
| <i>Table 5.2: Sensitivity of Study Area</i>                                                                 | 22 |
| <i>Table 5.3: Summary of the Risk of Construction Effects</i>                                               | 22 |
| <i>Table 6.1: Predicted concentrations of NO<sub>2</sub> of the proposed development on the receptors</i>   | 24 |
| <i>Table 6.2: Predicted concentrations of PM<sub>10</sub> of the proposed development on the receptors</i>  | 25 |
| <i>Table 6.3: Predicted concentrations of PM<sub>2.5</sub> of the proposed development on the receptors</i> | 27 |
| <i>Table 6.4: Damage Cost Calculation</i>                                                                   | 28 |
| <i>Table B 1: Stage 1 Criteria to proceed to Stage 2</i>                                                    | 33 |
| <i>Table B 2: Indicative Criteria for Requiring an Air Quality Assessment</i>                               | 34 |
| <i>Table C 1: Dust emission magnitude</i>                                                                   | 37 |
| <i>Table C 2: Magnitude of Receptor Sensitivity</i>                                                         | 38 |
| <i>Table C 3: Demolition</i>                                                                                | 41 |
| <i>Table C 4: Earthworks</i>                                                                                | 41 |
| <i>Table C 5: Construction</i>                                                                              | 41 |
| <i>Table C 6: Track out</i>                                                                                 | 41 |
| <i>Table E. 1: Relevant NO<sub>2</sub> Monitoring Data Used for Model Verification</i>                      | 46 |
| <i>Table E. 2: Relevant Background Concentrations Used for Model Verification</i>                           | 47 |
| <i>Table E. 3: Comparison of monitored and modelled road NO<sub>2</sub> contribution</i>                    | 47 |

# 1 Introduction

## 1.1 Overview

Ayad Al-Tuhafi Architects Ltd is seeking consent for mixed-use development at 8 Shooting Field, Steyning, West Sussex BN44 3RX (hereafter referred to as the 'proposed development'), which is within the Horsham District Council (HDC).

AVAL Consulting Group Limited (ACGL) was instructed by the client to produce an Air Quality Assessment to accompany the planning application to the HDC for consent to undertake the proposed work.

The proposal for the redevelopment of Steyning Grammar School and the adjacent fields.

The potential local air quality effects of the proposed development have been assessed using the latest planning guidance from the Environmental Protection UK (EPUK), the Institute of Air Quality Management (IAQM)<sup>1</sup> and the Department for Environment, Food and Rural Affairs (Defra)<sup>2</sup>.

This report addresses potential air quality impacts associated with the proposed development from construction and earthworks in accordance with the Institute of Air Quality Management (IAQM) guidance on assessing impacts from demolition and construction activities<sup>3</sup>. Further assessment of the impacts from potential traffic generated by the development and emissions damage cost calculation in line with the emissions mitigation guidance for Sussex<sup>4</sup> are also presented.

HDC, the local authority has two Air Quality Management Areas (AQMA) in town centre of Storrington (Storrington AQMA) and the village of Cowfold (Cowfold AQMA) declared 2010 and 2011, respectively, for exceedances of NO<sub>2</sub>. The application site is not located within either AQMA. An Air Quality Assessment was therefore undertaken in order to determine baseline conditions, consider potential effects as a result of the proposals and define any requirement for mitigation.

## 1.2 Objective

This report provides an assessment of the following key impacts associated with the constructional and operational stage of the proposed development:

- Nuisance, loss of amenity and health impacts associated with the construction stage of the development of sensitive receptors;
- Suitability of the proposed development location in terms of existing air quality;
- Changes in traffic-related pollutant concentrations associated with the operational stage of the proposed development; and

---

<sup>1</sup> IAQM (2024): 'Land Use Planning and Development Control: Planning for Air Quality v1.2'.

<sup>2</sup> Defra (2022): 'Local Air Quality Management – Technical Guidance (TG22)'.

<sup>3</sup> IAQM (2024): 'Guidance on the Assessment of Dust from Demolition and Construction v2.2'.

<sup>4</sup> Sussex Air Quality Partnership (2021): Air quality and emissions mitigation guidance for Sussex

### 1.3 Site Location

The National Grid Reference for the centre of the site is 517500, 112500. Figure 1.1 shows the proposed site location. The proposed development is not located on the edge of an Air Quality Management Area (AQMA) declared as a result of breaching NO<sub>2</sub> air quality objective. The closest Local Nature Reserve is approximately 3.8km east of the proposed development site, and the closest SSSI site is approximately 1.9km west of the site.

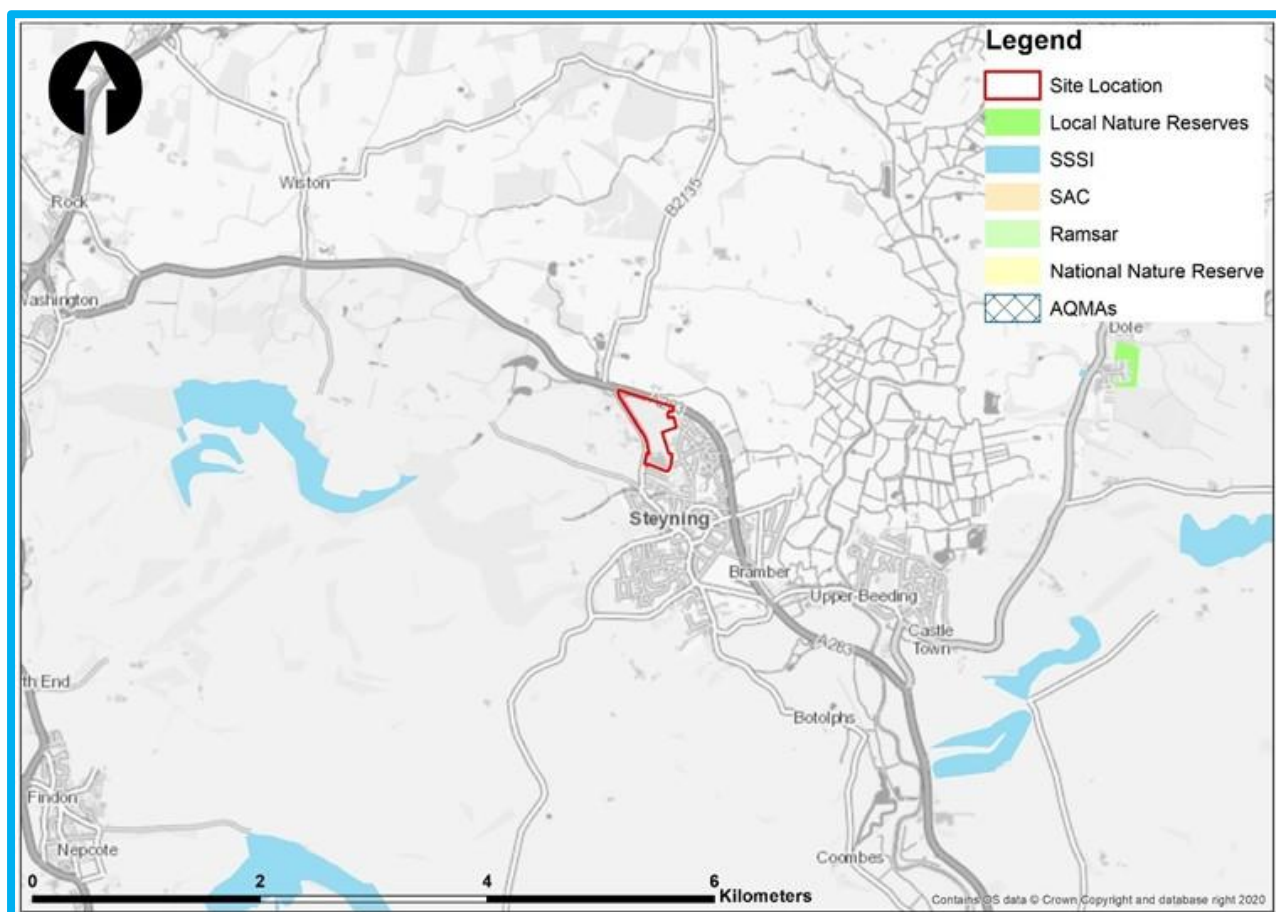


Figure 1.1: Proposed site location

### 1.4 Key Pollutants

The key pollutants associated with the construction stage of the project will be 'disamenity' or 'nuisance' dust. The key pollutants associated with the operational stage of the proposed development will be road traffic emissions including nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>). These pollutants are therefore considered as part of this assessment. Further details of the key pollutants are presented in Appendix A.

## 2 Legislation and Policy

This section summarises all legislation, policy, statutory and non-statutory guidelines relevant to the proposed development. Furthermore, the latest regional and local planning policy guidance specifically applicable to the proposed development has been reviewed.

### 2.1 European Union

The EU sets legally binding limit values for outdoor air pollutants to be met by EU countries by a given date. These limit values are based on the World Health Organisation (WHO) guidelines on outdoor air pollutants. These are legally binding and set out to protect human health and the environment by avoiding, preventing or reducing harmful air pollution effects.

The current air quality directive is the Directive 2008/50/EC<sup>5</sup> on ambient air quality and cleaner air for Europe entered into force in June 2008. This merged most of the existing 'Daughter' Directives<sup>6</sup>; maintaining existing air quality objectives set out by 'Daughter' Directives for sulphur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), and oxides of Nitrogen (NO<sub>x</sub>), particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), lead (Pb), benzene (C<sub>6</sub> H<sub>6</sub>), carbon monoxide (CO), ozone (O<sub>3</sub>). It also includes related objectives, exposure concentration obligation and exposure reduction targets for PM<sub>2.5</sub> (fine particles). The 'Daughter' Directives were based upon requirements set out in the first EU Ambient Air Quality Framework Directive 96/92/EEC<sup>7</sup>.

### 2.2 National Level - England

The UK government has a legal responsibility to meet the EU limit values. Part IV of the 1995 Environment Act<sup>8</sup> sets guidelines for protecting air quality in the UK and forms the basis of the local air quality management. The Environment Act requires local authorities in the UK to review air quality in their area periodically and designate 'Air Quality Management Area' (AQMA) if improvements are necessary. Where an AQMA is designated, local authorities are also required to produce an 'Air Quality Action Plan' (AQAP) detailing the pollution reduction measures that need to be adopted to achieve the relevant air quality objectives within an AQMA.

As part of the Environment Act, the UK Government was required to publish a National Air Quality Strategy (NAQS) to establish the system of 'local air quality management' (LAQM) for the designation of AQMAs. This led to the introduction of the first Air Quality Strategy (AQS) in 1997<sup>9</sup> which since has progressed through several revisions until it was replaced by the Air Quality Strategy for England, Scotland, Wales and Northern Ireland 2007<sup>10</sup>. Each revision introduced strategies and regulations that considered measures for different pollutants by tightening existing objectives and by introducing new ones to establish a common framework

<sup>5</sup> European Union (2008): 'Ambient air quality assessment management', Framework Directive 2008/50/EC.

<sup>6</sup> European Union. (1999), 'Ambient air quality assessment management', Framework Directive 1999/30/EC;

European Union. (2000), 'Ambient air quality assessment management', Framework Directive 2000/3/EC;

European Union. (2002), 'Ambient air quality assessment management', Framework Directive 2002/3/EC;

European Union. (2004), 'Ambient air quality assessment management', Framework Directive 2004/107/EC.

<sup>7</sup> European Union. (1996), 'Ambient air quality assessment management', Framework Directive 96/62/EC.

<sup>8</sup> Parliament of the United Kingdom. (1990), 'Environmental Protection Act', Chapter 43. Queen's Printer of Acts of Parliament.

<sup>9</sup> Department for Environment Food and Rural Affairs. (1997), 'The United Kingdom National Air Quality Strategy', Cm 3587, Department for Environment Food and Rural Affairs.

<sup>10</sup> Department for Environment Food and Rural Affairs. (2007), 'The Air Quality Strategy for England, Scotland, Wales and Northern Ireland', Cm 7169, Department for Environment Food and Rural Affairs.

to protect human health and the environment by achieving ambient air quality improvements. The latest version of the AQS sets out a framework to enable local authorities to deliver for their communities and contribute to the long-term air quality goals, including the ambitious target for fine particulate matter (PM<sub>2.5</sub>)<sup>11</sup>.

The 2008 EU ambient air quality directive 2008/50/EC was transposed to England law through the introduction of the Air Quality (Standards) Regulations in 2010 which also incorporated the fourth EU Daughter Directive (2004/107/EC) that set target values for certain toxic heavy metals and polycyclic aromatic hydrocarbons, (PAH)<sup>12</sup>.

### 2.2.1 National Planning Policy Framework

The principal national planning policy guidance in respect of the proposed development is the National Planning Policy Framework (NPPF)<sup>13</sup>. The most recent update of the NPPF was published on December 2024 by the Ministry of Housing, Communities and Local Government (MCLG).

The NPPF Section 110 states that:

The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

Section 187 states:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

...preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans..."

Section 198 states:

"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the

---

<sup>11</sup> Department for Environment Food and Rural Affairs. (2007), 'The Air Quality Strategy Framework for local authority delivery'.

<sup>12</sup> Statutory Instrument. (2010), 'The Air Quality Standards Regulations', No. 1001. Queen's Printer of Acts of Parliament.

<sup>13</sup> National Planning Policy Framework. Accessible at:  
[https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF\\_December\\_2024.pdf](https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf)

site or the wider area to impacts that could arise from the development. In doing so they should:

- a. mitigate and reduce to a minimum potential adverse impact resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;
- b. identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
- c. limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes, and nature conservation.

Section 199 states that:

Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.”

### **2.2.2 Relevant National Planning Practice Guidance**

The DCLG published a number of supporting web-based resources of Planning Practice Guidance (PPG)<sup>14</sup> to supplement the NPPF. With respect to air quality PPG provide guidance on when air quality is relevant to a planning application. It states that:

"Concerns could arise if the development is likely to generate air quality impact in an area where air quality is known to be poor. They could also arise where the development is likely to adversely impact upon the implementation of air quality strategies and action plans and/or, in particular, lead to a breach of EU legislation (including that applicable to wildlife)."

The PPG also states that, when deciding whether air quality is relevant to a planning application, the applicant should consider whether the proposal will:

"Significantly affect traffic in the immediate vicinity of the proposed development site or further afield. Introduce new point sources of air pollution,

Expose people to existing sources of air pollutants,

---

<sup>14</sup> National Planning Practice Guidance web-based resource. Accessible at: <http://planningguidance.planningportal.gov.uk/>

Give rise to potentially unacceptable impact (such as dust) during construction for nearby sensitive locations.....,

- Affect biodiversity"

### 2.2.3 Statutory Nuisance

It is recognised that the planning system presents a way of protecting amenity. However, in cases where planning conditions are not applicable to a development/installation, the requirements of the Environmental Protection Act 1990 still apply. Under Part III of the Environmental Protection Act 1990, local authorities have a statutory duty to investigate any complaints of:

- "Any premises in such a state as to be prejudicial to health or a nuisance
- smoke emitted from premises so as to be prejudicial to health or a nuisance
- fumes or gases emitted from premises so as to be prejudicial to health or a nuisance
- any dust, steam, smell or other effluvia arising on industrial, trade or business premises and being prejudicial to health or a nuisance
- any accumulation or deposit which is prejudicial to health or a nuisance"

Where the local authority establishes any one of these issues constitutes a statutory nuisance and believes it to be unreasonably interfering with the use or enjoyment of someone's premises and/or is prejudicial to health, an abatement notice will be served on the person responsible for the offence or the owner/occupier. Failure to comply with the notice could lead to a prosecution. However, it is considered as a defence if the best practicable means to prevent or to counteract the effects of the nuisance are employed.

### 2.2.4 Relevant National Air Quality Standards

A summary of the relevant Air Quality Standards/Objectives (henceforth referred to as 'AQO') and the types of receptors that are relevant to this assessment are presented in Table 2.1 and Table 2.2. The AQO listed in Table 2.1 applies only at locations with relevant exposure where a member of the public could be exposed to a level of pollution concentration for the specific averaging periods for that pollutant as stated in Table 2.2.

Table 2.1 : AQO Relevant to the Proposed Development

| Pollutant                              | Air Quality Objectives |                      | Concentration measured as: | Applicable to:        |
|----------------------------------------|------------------------|----------------------|----------------------------|-----------------------|
|                                        | Concentration          | Allowance            |                            |                       |
| Nitrogen Dioxide (NO <sub>2</sub> )    | 200 µg/m <sup>3</sup>  | 18 per calendar year | 1-hour mean                | All local authorities |
|                                        | 40 µg/m <sup>3</sup>   |                      | Annual mean                | All local authorities |
| Nitrogen Oxide (NO <sub>x</sub> )      | 30 µg/m <sup>3</sup>   |                      | Annual mean                | All local authorities |
| Particulate Matter (PM <sub>10</sub> ) | 50 µg/m <sup>3</sup>   | 35 per calendar year | 24-hour mean               | All local authorities |

| Pollutant                                                     | Air Quality Objectives   |           | Concentration measured as: | Applicable to:        |
|---------------------------------------------------------------|--------------------------|-----------|----------------------------|-----------------------|
|                                                               | Concentration            | Allowance |                            |                       |
|                                                               | 40 µg/m <sup>3</sup>     |           | Annual mean                | All local authorities |
| Particulate Matter (PM <sub>2.5</sub> ) Exposure reduction(a) | 10 µg/m <sup>3</sup> (a) |           | Annual                     | All local authorities |

Notes: (a) This is a target value set by the Interim Planning Guidance on the consideration of the Environment Act PM<sub>2.5</sub> targets in planning decisions - published 4 October 2024

Source: Department for Environment Food and Rural Affairs (2022): 'Local Air Quality Management Technical Guidance' (TG.22).

Table 2.2 : Examples of Where the AQO Should Apply

| <b>Averaging period</b> | <b>Objectives should apply at</b>                                                                                                                            | <b>Objectives should not apply at</b>                                                                                                                                                                                                                                                                                                                          |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Annual</b>           | <i>All locations where members of the public might be regularly exposed. Building façades of residential properties, schools, hospitals, care homes etc.</i> | <i>Building façades of offices or other places of work where members of the public do not have regular access. Hotels, unless people live there as their permanent residence. Gardens of residential properties. Kerbside sites(as opposed to locations at the building façade), or any other location where public exposure is expected to be short-term.</i> |
| <b>24 Hour</b>          | <i>All locations where the annual mean objective would apply, together with hotels. Gardens of residential properties.<sup>(a)</sup></i>                     | <i>Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short-term.</i>                                                                                                                                                                                                              |
| <b>1 Hour</b>           | <i>Kerbside sites where the public would not be expected to have regular access.</i>                                                                         |                                                                                                                                                                                                                                                                                                                                                                |

Notes: (a) "Such locations should represent parts of the garden where relevant public exposure to pollutants is likely, for example where there are seating or play areas. It is unlikely that relevant public exposure to pollutants would occur at the extremities of the garden boundary, or in front gardens, although local judgement should always be applied."

Source: Department for Environment Food and Rural Affairs (2022): 'Local Air Quality Management Technical Guidance' (TG.22).

## **2.3 Local Level – Horsham District Council**

### **2.3.1 Horsham District Planning Framework (November 2015)**

The Horsham District Planning Framework (HDPF), adopted in November 2015, sets out the planning strategy for the years up to 2031 to deliver the social, economic and environmental needs of the HDPF plan area. The document highlights a few policies regarding air quality.

Policy 24 – Environmental Protection state that:

*“The high quality of the district’s environment will be protected through the planning process and the provision of local guidance documents. Taking into account any relevant Planning Guidance Documents, developments will be expected to minimise exposure to and the emission of pollutants including noise, odour, air and light pollution and ensure that they:*

- Contribute to the implementation of local Air Quality Action Plans and do not conflict with its objectives;*
- Maintain or reduce the number of people exposed to poor air quality including odour. Consideration should be given to development that will result in new public exposure, particularly where vulnerable people (e.g. the elderly, care homes or schools) would be exposed to the areas of poor air quality;”*

### **2.3.2 Air Quality and Emissions Mitigation Guidance for Sussex (Adopted 2021)**

HDC are members of the Sussex Air Quality Partnership (Sussex Air) which monitors pollutant concentrations across the region and have published guidance for developers on emissions mitigation. The guidance includes the requirement for an emissions mitigation damage cost calculation to be carried out for all developments, to quantify the monetised health damage value associated with transport emissions from the Proposed Development to offset the impact.

## 3 Methodology

### 3.1 Overview

This section provides the details of the methodological approach taken to assess the impacts on air quality from the construction and operation of the proposed development.

### 3.2 Scope of the Assessment

#### 3.2.1 Construction Dust Assessment

A construction dust assessment was carried out to consider impacts from ‘disamenity’ (or ‘nuisance’) dust, as discussed in Appendix C, associated with annoyance. The development has the potential to generate dust during the construction stage of the project. Although there are no standards (such as AQO) for dust disamenity or annoyance, various ‘custom and practice’ criteria have become established.

The construction stage of the proposed development will involve a number of activities that could potentially produce polluting emissions to air. These will be emissions of dust. However, they could also include releases of odours and/or more harmful gases and particles.

The IAQM’s guidance to assess the impacts of construction on human and ecological receptors has been followed in carrying out this air quality assessment. The guidance suggests that where a receptor is located within 250m (50m for statutory ecological receptors) of a site boundary and/or 50m of a route used by construction vehicles, up to 500m from the site entrance, a dust assessment should be undertaken. High sensitivity receptors are considered particularly sensitive when located within 20m of a works area. Figure 5.1 shows receptors that could be sensitive to dust that are located within 250m of the boundaries of the site.

Review of the Multi Agency Geographic Information for the Countryside (MAGIC) website<sup>15</sup>, which incorporates Natural England’s interactive maps, has identified no statutory ecological sensitive receptor within 50m of the application site. The assessment of construction impacts on ecological receptors has not therefore been included within this assessment.

The annual mean concentrations of PM<sub>10</sub> and PM<sub>2.5</sub> are well below their respective AQS, according to the UK-AIR background maps in Section 4.1. This provides a good indication that PM<sub>10</sub> and PM<sub>2.5</sub> concentrations for annual mean concentrations are likely to be below the respective AQSs at the application site and adjacent uses.

#### Construction Significance

For the purposes of this assessment, IAQM’s 2024 construction dust guidance<sup>16</sup> has been used. The IAQM guidance (Appendix B) suggests that Demolition, Earthworks, Construction and Trackout should be assessed individually to determine the overall significance as per the IAQM dust guidance, the first step in assessing the risk of impacts is to define the potential

---

<sup>15</sup> Natural England and MAGIC partnership organisations. Multi Agency Geographic Information for the Countryside. <http://www.magic.gov.uk/>

<sup>16</sup> Institute of Air Quality Management (2024): ‘Assessment of dust from demolition and construction 2024 V2.2’

dust emission magnitude. This can be considered 'Negligible', 'Small', 'Medium' or 'Large' for each of the construction stages. Whilst the IAQM provides examples of criteria that may be used to assess these magnitudes, the vast number of potential variables mean that every site is different and therefore professional judgement must be applied by what the IAQM refer to as a "technically competent assessor". The construction dust assessment therefore relies on the experience of the appraiser.

As such, attempts to define precisely what constitutes a negligible, small, medium or large dust emission magnitude should be treated with caution. Factors such as the scale of the work, both in terms of size and time, the construction materials and the plant to be used must be considered.

The next step is to define the sensitivity of the area around the construction site. As stated in the IAQM guidance:

*"the sensitivity of the area takes into account a number of factors:*

- the specific sensitivities of receptors in the area;*
- the proximity and number of those receptors;*
- in the case of PM<sub>10</sub>, the local background concentrations; and*
- site-specific factors, such as whether there are natural shelters, such as trees, to reduce the risk of wind-blown dust."*

Based on these factors, the area is categorised as being of 'Low', 'Medium' or 'High' sensitivity

After defining the dust emission magnitudes for each stage and the sensitivity of the area have been, the risk of dust impacts can be determined. The IAQM provides a risk of impacts matrix for each construction stage. The overall significance for the construction stage can then be judged from the stages assessed, subject to professional judgement.

Combustion exhaust gases from diesel-powered plants and construction vehicles accessing the application site will also be released. However, the volumes and periods over which these releases will occur are unlikely to result in any significant peaks in local air pollution concentrations and therefore this has been scoped out of the assessment.

### 3.2.2 Operational Impacts

Vehicle emissions will arise from the combustion of fossil fuels in vehicle engines and their subsequent release to atmosphere via tailpipe exhausts. The most significant pollutants released by cars and other vehicles are oxides of nitrogen (NO<sub>2</sub>/NO<sub>x</sub>) and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>). Releases of carbon monoxide (CO) and some volatile hydrocarbons (e.g. benzene and 1,3-butadiene) are of less significance and are not considered further in this report.

As it is elevated annual mean concentrations of NO<sub>2</sub> and PM<sub>10</sub> that have resulted in the declaration of most AQMAs across the UK, these are the pollutants of most concern, and they have therefore been the focus of this air quality assessment. PM<sub>2.5</sub>, which is another fraction of particulate matter, has also been considered.

The latest EPUK & IAQM planning guidance provides indicative thresholds for changes in traffic flows which would require a detailed, dispersion modelling air quality assessment. These are a change in 24-hour annual average daily traffic (AADT) flows exceeding 500 light-duty vehicles (LDVs) and/or 100 heavy-duty vehicles (HDVs) on any specific road link outside of an AQMA, or 100 LDVs and/or 25 HDVs within an AQMA.

Full justification behind the screening assessment of air quality related impacts on existing sensitive receptors in the local area has been provided in Section 6 of this report.

### **3.2.3 Detailed Air Quality Assessment**

Modelling of B2135 Horsham Road, A283 Steyning By-Pass, St. Cuthman's Road and Shooting Field have been undertaken in order to determine if the site is suitable for an educational development in terms of existing air quality.

Based on the EPUK criteria set out in Appendix A, the need for a traffic-related air quality impact assessment is considered to be required as the operational stage of the proposed development will result in over 500 daily vehicle trips.

### **3.2.4 IAQM/EPUK Assessment of Modelled Impacts**

The magnitude of change in pollutant concentrations predicted by the road's dispersion modelling will be described with the latest update of the EPUK IAQM Development Control guidance<sup>1</sup>. This guidance provides a standard method for describing air quality impacts ranging from 'negligible' to 'substantial' and is widely used and accepted as best practice throughout the UK.

In summary, the approach involves quantifying the magnitude of change in annual mean concentrations attributed to the change in traffic emissions during the operational stage of the proposed development. This is expressed by the magnitude of incremental change as a portion of each respective air quality objective and in examining the change in the context of the new total concentration relative to the UK air quality objectives, an impact descriptor can then be assigned. The descriptors are usually applicable to adverse impacts but can also be used to define beneficial impacts.

### **3.2.5 Modelled Scenarios**

The assessment on identifying the impact of current traffic-related emissions sources in the area of the proposed development has been carried out using the latest version of 'ADMS Roads' dispersion modelling software (version 5.1.0.2) developed by Cambridge Environmental Research Consultants (CERC). This model is commonly used in assessing planning applications and regulatory assessment of traffic-related emissions.

Based on above the following scenarios have been considered to assess educational development suitability:

- 2024 Base Year and
- 2026 Earliest Year of Occupation

The model verification has been carried out using 2024 base year traffic data as this is the latest year of monitored local air quality data available in the HDC published ASR. Further details of the model verification process are presented in Appendix E .:

According to the guidance provided by Defra in their Air Quality Strategy, vehicle emissions are expected to decrease in future years as a result of advancements in abatement technologies. It is also expected that more stringent emission limits will be imposed upon manufacturers. Hence, the 2026 operational year scenario was considered to be the worst-case.

### 3.2.6 Dispersion Model Used

The science of ADMS Roads is significantly more advanced than that of most other air dispersion models (such as CALINE, ISC, and R91) in that it incorporates the latest understanding of the boundary layer structure and goes beyond the simplistic Pasquill-Gifford stability categories method with an explicit calculation of important parameters. The model uses advanced algorithms for the height dependence of wind speed, turbulence and stability to produce improved predictions.

### 3.2.7 Road Traffic Data

The following key facts of the road traffic data were considered:

- Traffic data has been obtained from road traffic statistics published by the government and accessible via <https://roadtraffic.dft.gov.uk>;
- The speed at junctions has been reduced as advised in Defra Technical Guidance (TG22) for a robust assessment;
- A TEMPRO factor has been applied to predict traffic flows for the year 2026;
- Where measured road speed is not available, we have used the existing road speed limit for the purpose of this assessment.

Table 3.1 shows the traffic data for the proposed development, and Figure 3.1 shows the extent of the ADMS Roads dispersion modelling network.

Table 3.1 : Relevant traffic Data for the Proposed Development

| Link Name             | Without 2026 | Development |             | With Development 2026 |       |             |
|-----------------------|--------------|-------------|-------------|-----------------------|-------|-------------|
|                       | AADT         | HDV%        | Speed (kph) | AADT                  | HDV%  | Speed (kph) |
| B2135 Horsham Road    | 3,883        | 1.5%        | 96          | 6,283                 | 39.1% | 96          |
| A283 Steyning By-Pass | 17,666       | 2.4%        | 96          | 20,066                | 14.0% | 96          |
| St. Cuthman's Road    | 464          | 0.0%        | 32          | 464                   | 0.0%  | 32          |
| Shooting Field        | 2,927        | 0.3%        | 48          | 5,327                 | 5.2%  | 48          |

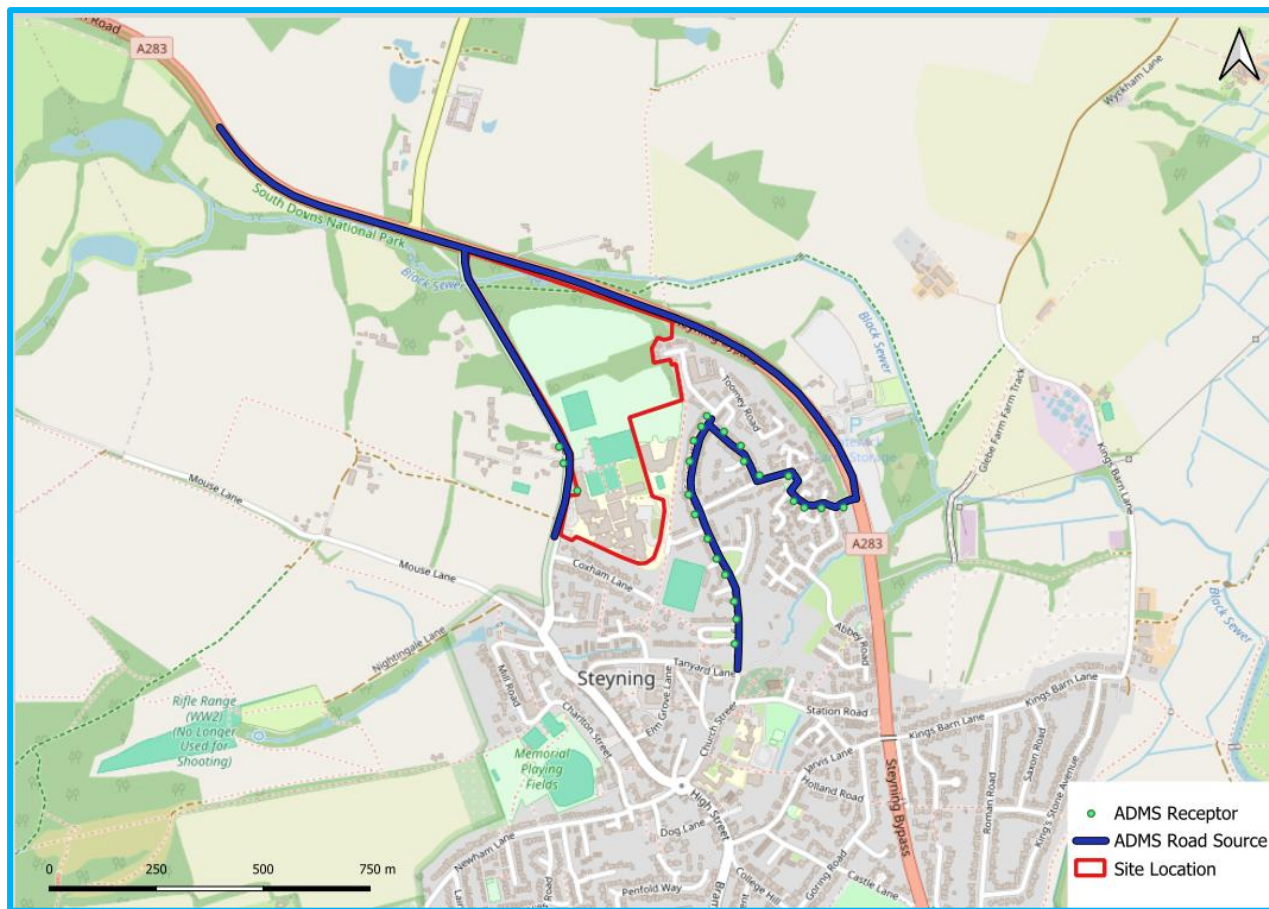


Figure 3.1: Modelling Network of existing road with Receptors used for ADMS Roads Dispersion Modelling

### 3.2.8 Meteorological Data

The key meteorological parameters for dispersion modelling are wind speed and wind direction. There are other meteorological parameters, which also need to be taken into account such as cloud cover, surface temperature, precipitation rate and relative temperature.

The closest, most representative meteorological monitoring station identified is the Gatwick meteorological monitoring site which is located approximately 30.7km from the proposed development site.

To undertake a worst-case meteorological assessment, dispersion modelling has been carried out with meteorological data from the period 2023 to 2025. The maximum annual mean concentrations predicted across the modelled years have been used for each receptor.

Figure 3.2 below presents the wind rose for each modelling year.

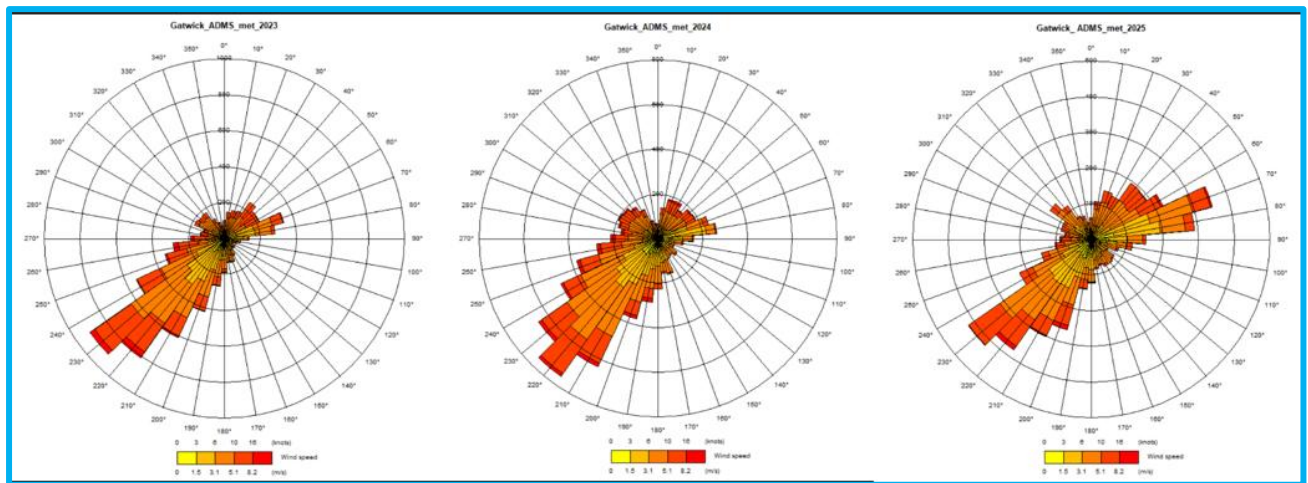


Figure 3.2: Windrose for Gatwick Meteorological Station 2023-2025

### 3.2.9 Assessment of Background Concentrations

This assessment considers road traffic emission sources in detail, and as part of the predictive process, all non-road traffic-related emission sources in the Defra data set were assigned appropriate 'background' concentrations at the modelled receptors. Further details regarding the assignment of background pollution concentration are presented in Section 4.3.

### 3.2.10 Emissions Factors

For the purpose of this assessment, the latest Defra Emission Factor Toolkit (EFT 14.1)<sup>17</sup> has been used for the earliest opening year. The EFT Version 14.1 has been developed for the UK by the National Atmospheric Emissions Inventory (NAEI) and Transport for London (TfL). The EFT is based on data collected from a number of sources, including the European Environment Agency (EEA) COPERT (Computer Programme to calculate Emissions from Road Transport) emission calculator.

### 3.2.11 NO<sub>x</sub> to NO<sub>2</sub> Conversion Method

This assessment uses the latest NO<sub>x</sub> to NO<sub>2</sub> conversion factor toolkit for the operational stage of this development (version 9.1, August 2024), provided by Defra as a Microsoft Excel-based calculation tool which is available from Defra's web-based air quality resource centre. This method is considered to be the most appropriate technique for determining NO<sub>2</sub> concentrations from road NO<sub>x</sub> contributions.

### 3.2.12 Estimating Hourly and Daily Mean Concentrations

The latest Local Air Quality Management (LAQM) Technical Guidance (TG 22) has been used for predicting 1 hourly and 24-hourly pollutant concentrations. The guidance suggests that the short term hourly NO<sub>2</sub> AQO of 200µg/m<sup>3</sup> (not to be exceeded more than 18 times per year) is not likely to exceed at any roadside locations if the annual mean concentration is below 60µg/m<sup>3</sup>. Based on this guidance, the hourly mean NO<sub>2</sub> AQO is only considered when the annual mean NO<sub>2</sub> concentrations are over 60µg/m<sup>3</sup>.

<sup>17</sup> Defra, 2026, Emissions Factor Toolkit Available at: <https://laqm.defra.gov.uk/air-quality/air-quality-assessment/emissions-factors-toolkit/>

In accordance with the guidance, the short term 24 hourly PM<sub>10</sub> mean concentration can be calculated using the following equation as presented below:

$$\text{Number of 24 hour mean exceedence} = 18.5 + 0.00145 \times \text{annual mean}^3 + \left( \frac{206}{\text{annual mean}} \right)$$

### 3.2.13 Relevant Sensitive Receptors

Table 3.2 below presents the locations of sensitive receptors considered within this assessment.

LAQM technical guidance (TG 22) clarifies where likely exceedances of the objectives should be assessed and states that Review and Assessment should focus on:

“Locations where members of the public are likely to be regularly present and are likely to be exposed for a period of time appropriate to the averaging period of the relevant air quality objective”.

Table 2.2 above provides details of where the respective objectives should and should not apply and therefore, the types of receptors that are relevant to the assessment.

It is expected that receptors at the ground floor level are likely to experience the highest traffic-related pollution concentrations. Receptors located on the first floor and above are likely to experience lower concentrations than ground floor receptors due to the increasing height from the ground level. Table 3.2 below shows the modelled receptor location.

Table 3.2: Sensitive Receptors Identified for the Proposed Development

| Receptor name                               | Height | National Grid Reference (X) | National Grid Reference (Y) |
|---------------------------------------------|--------|-----------------------------|-----------------------------|
| R1 - Residential (Horsham Road)             | 1.5    | 517392.56                   | 111944.33                   |
| R2 - Residential (Horsham Road)             | 1.5    | 517403.62                   | 111906.00                   |
| R3 - Steyning Leisure Centre (Horsham Road) | 1.5    | 517437.69                   | 111842.97                   |
| R4 - Residential (Shooting Field)           | 1.5    | 517736.66                   | 112023.54                   |
| R5 - Residential (Shooting Field)           | 1.5    | 517723.88                   | 111998.84                   |
| R6 - Residential (Shooting Field)           | 1.5    | 517706.84                   | 111965.62                   |
| R7 - Residential (Shooting Field)           | 1.5    | 517698.34                   | 111917.07                   |
| R8 - Residential (Shooting Field)           | 1.5    | 517697.47                   | 111839.56                   |
| R9 - Residential (Shooting Field)           | 1.5    | 517713.66                   | 111793.57                   |
| R10 - Residential (Shooting Field)          | 1.5    | 517744.34                   | 111737.35                   |

| Receptor name                          | Height | National Grid Reference (X) | National Grid Reference (Y) |
|----------------------------------------|--------|-----------------------------|-----------------------------|
| R11 - Residential (Shooting Field)     | 1.5    | 517766.47                   | 111691.35                   |
| R12 - Residential (Shooting Field)     | 1.5    | 517787.44                   | 111654.52                   |
| R13 - Residential (Shooting Field)     | 1.5    | 517809.81                   | 111592.76                   |
| R14 - Residential (Shooting Field)     | 1.5    | 517816.06                   | 111551.51                   |
| R15 - Residential (Shooting Field)     | 1.5    | 517813.41                   | 111494.28                   |
| R16 - Residential (St. Cuthman's Road) | 1.5    | 517777.47                   | 111988.03                   |
| R17 - Residential (St. Cuthman's Road) | 1.5    | 517817.38                   | 111956.09                   |
| R18 - Residential (St. Cuthman's Road) | 1.5    | 517825.38                   | 111920.16                   |
| R19 - Residential (St. Cuthman's Road) | 1.5    | 517862.62                   | 111888.22                   |
| R20 - Residential (Farnefold Road)     | 1.5    | 517930.53                   | 111888.22                   |
| R21 - Residential (Henderson Walk)     | 1.5    | 517943.81                   | 111829.66                   |
| R22 - Residential (Henderson Walk)     | 1.5    | 517969.12                   | 111815.02                   |
| R23 - Residential (Henderson Walk)     | 1.5    | 518009.03                   | 111815.02                   |
| R24 - Residential (Cannons Way)        | 1.5    | 518060.94                   | 111817.68                   |

### 3.2.14 Model Uncertainties, Assumptions and Limitations

The assessment has been carried out based on the following assumptions:

- The earliest possible year of occupation is assumed to be 2026 however for verification purposes the model has used 2024 data.
- The mitigation measures proposed in Section 6 will be implemented in order to mitigate construction-related dust nuisance.
- Emissions from vehicles are expected to decrease in the future, as mentioned in Section 3.4.1. Hence, the 2026 opening year scenario was considered to be the worst-case and therefore no further future year scenario was considered in this assessment.

- For the construction dust risk assessment, it has been assumed that all construction activities will be carried out for the duration of the construction period in order to assess a worst-case scenario.

No onsite energy plants have been proposed; therefore, no assessment of any potential impacts have been carried out.

### **3.2.15      Damage Cost Calculation**

The Air Quality and Emissions Mitigation Guidance for Sussex (2021) was used to carry out the mitigation assessment for the predicted impacts to the existing air quality from the operation of the proposed development.

The assessment will calculate a monetary value that will offset air quality impacts of a development once spent on mitigation. This assessment uses the latest version of Defra's Emissions Factor Toolkit (EFT v14.1)<sup>18</sup> to work out the annual impact of additional transport in terms of NO<sub>x</sub> and PM<sub>2.5</sub> emissions (tonnes per year). This is then multiplied by a damage cost assigned to pollutants by using the Defra air quality damage cost appraisal toolkit<sup>19</sup> designed in conjunction with the Air Quality Damage Cost Guidance<sup>20</sup>.

---

<sup>18</sup> Defra, 2026, Emissions Factor Toolkit Available at: <https://laqm.defra.gov.uk/air-quality/air-quality-assessment/emissions-factors-toolkit/>

<sup>19</sup> Defra, 2026, Available at: <https://www.gov.uk/government/publications/assess-air-quality-impacts>

<sup>20</sup> Defra, 2026, Air quality appraisal: damage cost guidance Updated 28 April 2026: <https://www.gov.uk/government/publications/assess-air-quality-impacts/air-quality-appraisal-damage-cost-guidance>

## 4 Baseline

The following section sets out the baseline conditions in relation to air quality for the proposed development. Baseline air quality information is available from a number of sources, including local and national monitoring data reports and websites. For the purposes of this assessment, data has been obtained from the Defra air quality resource website<sup>21</sup> and from the most recent Horsham District Council ASR.<sup>22</sup>

### 4.1 UK-AIR Background Pollution

Defra provides estimated background concentrations of the UKAQS pollutants at the UK Air Information Resource (UK-AIR) website<sup>23</sup>. These estimates are from detailed modelling tools and presented as concentrations at central 1km<sup>2</sup> National Grid square locations across the UK. At the time of writing, the most recent background maps were from 2023 and 2025 based on monitoring data from 2021.

The UK-AIR data are projected to represent a uniform combination of all emissions sources within the general area of a particular grid square location. Concentrations of pollutants at various sensitive receptor locations can be calculated by modelling the emissions from nearby pollution sources, such as a busy road, and then, adding it to the appropriate UK-AIR background datum.

The predicted background pollution concentrations for NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> for 2022 to 2024 are presented in Table 4.1. These data were taken from the central grid square location closest to the application site (i.e. grid reference: 517500, 112500).

Table 4.1: 2022 to 2024 background concentrations of pollutants at the application site

| Pollutant         | Predicted background concentration (µg/m <sup>3</sup> ) |      |      | Averaging period          | Air quality standard concentration (µg/m <sup>3</sup> ) |
|-------------------|---------------------------------------------------------|------|------|---------------------------|---------------------------------------------------------|
|                   | 2022                                                    | 2023 | 2024 |                           |                                                         |
| NO <sub>2</sub>   | 8.17                                                    | 7.96 | 7.70 | annual mean               | 40                                                      |
| NO <sub>x</sub>   | 10.5                                                    | 10.2 | 9.86 | annual mean               | 30                                                      |
| PM <sub>10</sub>  | 10.4                                                    | 10.3 | 10.2 | (gravimetric) annual mean | 40                                                      |
| PM <sub>2.5</sub> | 6.17                                                    | 6.10 | 6.02 | (gravimetric) annual mean | 10                                                      |

Note: Exceedances of the annual mean AQO are shown in **bold**

The data in Table 4.1 show that annual mean background concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> in the vicinity of the application site between 2022 and 2024 were predicted to be below their respective AQSS. The data show that in 2024, NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations were predicted to be below the AQS by 81%, 75% and 40%, respectively.

<sup>21</sup> Department for Environment Food and Rural Affairs. Accessible at: <https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2021>

<sup>22</sup> Horsham District Council (2025): 'Horsham District 2025 Air Quality Annual Status Report

<sup>23</sup> Defra: UK-AIR. [www.uk-air.defra.gov.uk](http://www.uk-air.defra.gov.uk)

Concentrations of all pollutants were predicted to decline each year, which is principally due to the forecast effect of cleaner vehicles being rolled out. It is noted that such improvements have not been universally realised.

## 4.2 Local Sources of Monitoring Data

Monitoring at background locations is considered an appropriate source of data for the purposes of describing baseline air quality.

### Automatic Monitoring

HDC currently undertakes automatic (continuous) monitoring at three sites. The most recent data available from these sites are included in Table 4.2 and Table 4.3.

Table 4.2: NO<sub>2</sub> Data from Automatic Monitors

| Monitor | Type | In AQMA? | Distance to kerb of nearest road (m) | Distance from the application site (km) | NO <sub>2</sub> annual mean concentration (µg/m <sup>3</sup> ) |      |      |
|---------|------|----------|--------------------------------------|-----------------------------------------|----------------------------------------------------------------|------|------|
|         |      |          |                                      |                                         | 2022                                                           | 2023 | 2024 |
| HO2     | R    | N        | 1.5                                  | 19.03                                   | 17.7                                                           | 16.2 | 15.7 |
| HO4     | R    | N        | 4.6                                  | 8.83                                    | 17.6                                                           | 17.4 | 16.6 |
| HO5     | R    | Y        | 6.5                                  | 11.59                                   | 21.0                                                           | 24.6 | 16.2 |

Note: Exceedances of the NO<sub>2</sub> annual mean AQO of 40µg/m<sup>3</sup> are shown in **bold**.

Table 4.3: PM<sub>10</sub> and PM<sub>2.5</sub> Data from Automatic Monitors

| Monitor | Type | PM <sub>10</sub> annual mean concentration (µg/m <sup>3</sup> )  |             |             |
|---------|------|------------------------------------------------------------------|-------------|-------------|
|         |      | 2022                                                             | 2023        | 2024        |
| HO2     | R    | 19.3                                                             | 20.5        | 16.1        |
| HO4     | R    | 14.0                                                             | 13.7        | 12.6        |
| Monitor | Type | PM <sub>2.5</sub> annual mean concentration (µg/m <sup>3</sup> ) |             |             |
|         |      | 2022                                                             | 2023        | 2024        |
| HO4     | R    | <b>13.1</b>                                                      | <b>14.6</b> | <b>10.1</b> |
| HO5     | R    | 7.3                                                              | 7.7         | 7.7         |

Note: Exceedances of the annual mean AQO are shown in **bold**.

The data in Table 4.2 and Table 4.3 show that annual mean concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> in recent years, have been consistently below the respective AQS at all monitoring locations with the exception HO4 for PM<sub>2.5</sub>, in light of the 2024 Interim Environment Act PM<sub>2.5</sub> targets. As the monitors are located over 1km away from the application site, the concentrations would not be considered to be representative of background conditions in the vicinity of the site.

### Non-Automatic Monitoring

HDC operates an extensive non-automatic, NO<sub>2</sub> diffusion tube monitoring network across the borough. The most recently available monitoring data for diffusion tubes located within approximately 1km of the application site are included in Table 4.4. The closest monitoring site is located east from the application site.

Table 4.4: Monitoring Data from HDC's NO<sub>2</sub> Diffusion Tubes nearest the Application Site

| Monitor     | Type | Distance to kerb of nearest road (m) | Distance from the application site (km) | In AQMA ? | NO <sub>2</sub> annual mean concentration (µg/m <sup>3</sup> ) |      |      |
|-------------|------|--------------------------------------|-----------------------------------------|-----------|----------------------------------------------------------------|------|------|
|             |      |                                      |                                         |           | 2022                                                           | 2023 | 2024 |
| Steyning 4N | R    | 1.0                                  | 0.590 S                                 | Y         | 18.5                                                           | 18.2 | 15.7 |

Note: Exceedances of the NO<sub>2</sub> annual mean AQO of 40µg/m<sup>3</sup> are shown in **bold**.

The data in Table 4.4 show that annual mean concentrations of NO<sub>2</sub> have been below the 40µg/m<sup>3</sup> objective at the monitoring site since 2022. Monitoring station Steyning 4N, High St, near Sheep Pen Ln, has the lowest concentration in 2024 and is closest to the application site, approximately 590m to the south. The recorded data in 2024 was an annual mean NO<sub>2</sub> concentration of 15.7µg/m<sup>3</sup> which is well below the AQS.

The diffusion tube has recorded annual mean concentration below 60µg/m<sup>3</sup>; the indicative threshold above which exceedances of the short-term (hourly) AQS for NO<sub>2</sub> may be observed.

Although the diffusion tube concentration for NO<sub>2</sub> represent roadside locations, the station is at a close enough distance to the development site that the concentration can be considered representative of background concentration across the development site.

### Summary of Data used in Assessment

To ensure conservative predictions of pollutant concentrations, no reduction has been applied to the annual mean background NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> used in this assessment for future years. The NO<sub>2</sub> background concentration has been taken from the monitoring site Steyning 4N, within HDC. The PM<sub>10</sub> and PM<sub>2.5</sub> background concentrations have been taken from UK-AIR (2021) in the absence of any other suitable local monitoring data. The background concentrations used in the assessment are included in Table 4.5 .

Table 4.5 : Background annual mean concentrations used in this assessment.

| Pollutant         | Concentration (µg/m <sup>3</sup> ) | Data Source                |
|-------------------|------------------------------------|----------------------------|
| NO <sub>2</sub>   | 15.7                               | Diffusion tube Steyning 4N |
| PM <sub>10</sub>  | 10.2                               | UK-AIR (2021)              |
| PM <sub>2.5</sub> | 6.02                               | UK-AIR (2021)              |

## 5 Potential Impacts

### 5.1 Construction Impacts

The construction stage of the proposed development is yet to be decided. For the purpose of this assessment, the earliest construction year is assumed to be 2026. The impacts from demolition, earthworks, construction and track-out have been considered. In order to assess the worst-case scenario, it has been assumed that all activities will be carried out for the duration of the construction period. Figure 5.1 shows the construction dust assessment study area based on the recommended distances by IAQM<sup>24</sup>.

Magnitude and sensitivity descriptors that have been applied to assess the overall impact of the construction stage are presented in Appendix C.

Table 5.1 presents the potential dust emission magnitude based on project-specific construction activities and is based on the criteria presented in Table C1 within Appendix C.

The estimates for the dust emission magnitude for demolition, earthworks, construction and trackout below are based on the professional experience of Aval Group's consultants, information provided by the client and Google Earth imagery.

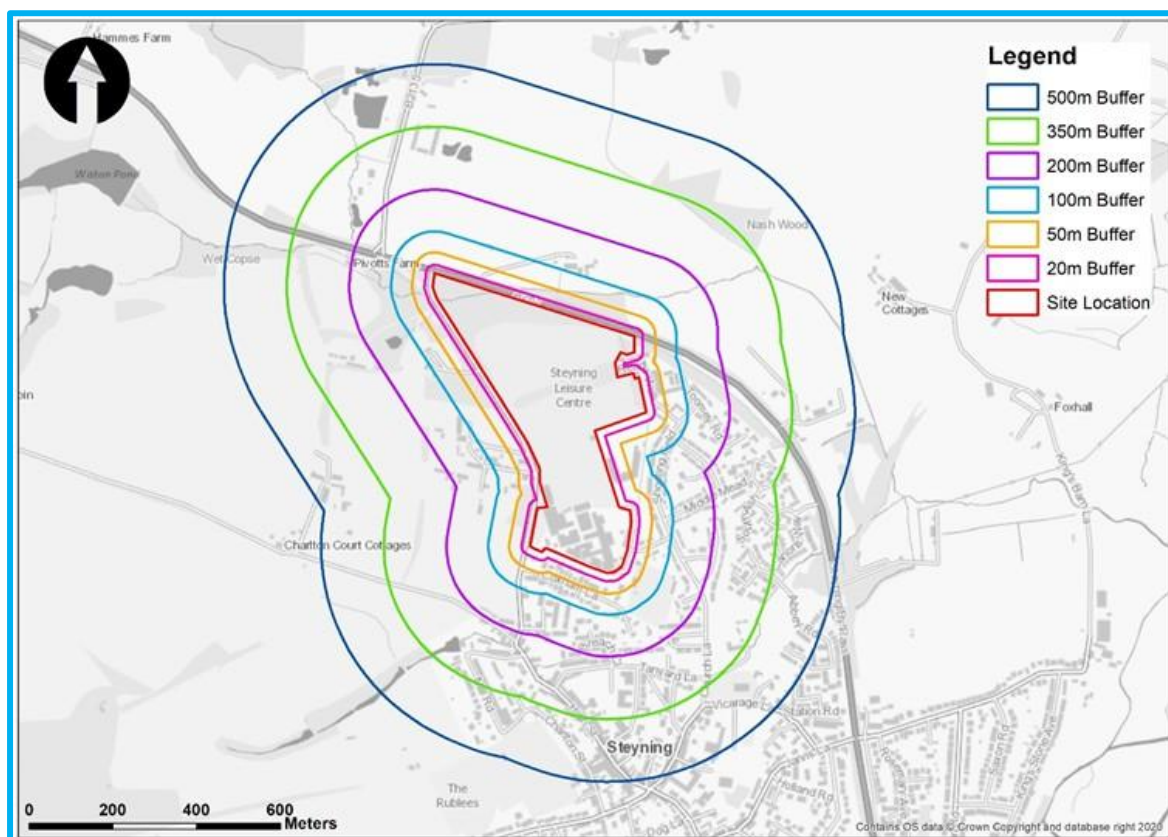


Figure 5.1: Construction assessment buffers

<sup>24</sup> Institute of Air Quality Management (2024): 'Guidance on the assessment of dust from demolition and construction'

Table 5.1 : Dust Emission Magnitude for the construction activities, based on the IAQM's guidance

| Activity     | Dust Emission Magnitude |
|--------------|-------------------------|
| Demolition   | Large                   |
| Earthworks   | Large                   |
| Construction | Medium                  |
| Trackout     | Small                   |

Table 5.2 presents the sensitivity of receptors to effects caused by construction activities and is based on the criteria presented in Table C 2 within Appendix C.

Table 5.2: Sensitivity of Study Area

| Potential Impact | Sensitivity of the surrounding area |            |              |          |
|------------------|-------------------------------------|------------|--------------|----------|
|                  | Demolition                          | Earthworks | Construction | Trackout |
| Dust Soiling     | High                                | High       | High         | High     |
| Human Health     | High                                | High       | High         | High     |

The overall risk of receptors to dust soiling effects and PM<sub>10</sub> effects are presented in Table 5.3. Risk is based on the criteria presented in Table C 3 to Table C 6 within Appendix C.

Table 5.3: Summary of the Risk of Construction Effects

| Sensitivity of Area | Risk       |            |              |          |
|---------------------|------------|------------|--------------|----------|
|                     | Demolition | Earthworks | Construction | Trackout |
| Dust Soiling        | High Risk  | High Risk  | Medium Risk  | Low Risk |
| Human Health        | High Risk  | High Risk  | Medium Risk  | Low Risk |

Based on the above, the largest risk associated with all construction activities are considered to be 'High Risk' with regards to dust soiling and 'High Risk' with regards to human health. Based on the outcome of the construction dust assessment, mitigation measures appropriate for the proposed development have been presented in Section 6. Overall, the impacts from disamenity dust and PM<sub>10</sub> from the construction phase of the proposed development are considered to be significant.

The UK-AIR data presented in indicate that annual mean concentrations of PM<sub>10</sub> are likely to be below 24µg/m<sup>3</sup> within the vicinity of the site<sup>25</sup>. Noting that there are approximately 20 highly sensitive receptors within 20m of the site boundary, the sensitivity of the area to human health impacts is defined as High with reference to IAQM guidance.

Review of the MAGIC website, which incorporates Natural England's interactive maps, has identified that the closest ecological receptors, Tottington Wood (LNR) and Chanctonbury Hill (SSSI), are located approximately 3.8km east and 1.9km west of the application site boundary, respectively. Therefore, based on distance alone, the proposed development can be

<sup>25</sup> The 24.0µg/m<sup>3</sup> 'threshold' is taken from Table 3 of the IAQM's construction dust guidance. This threshold, along with the number of receptors, their sensitivity, and their distance from source (construction site), helps establish the sensitivity of an area in terms of potential human health impacts from exposure to PM<sub>10</sub>. According to the guidance, baseline annual mean PM<sub>10</sub> concentrations below 24.0µg/m<sup>3</sup> indicate that the sensitivity of the area in terms of human health impacts is Low in all cases except when there are a large number (>100) of highly sensitive receptors within 20m of the construction site.

considered to have a Negligible impact on local ecological receptors, with reference to the IAQM guidance.

## **5.2 Site Specific Mitigation**

The IAQM lists recommended mitigation measures for Low, Medium and High Dust Impact Risks. The highly recommended mitigation measures for High Risk sites are included in Appendix D of this report.

Where dust generation cannot be avoided in areas close to neighbouring properties, additional mitigation measures should be put in place, such as HGV tire washing, windbreaks, sprinklers, and/or time/weather condition limits on the operation of some items or the carrying out of activities that are likely to generate a particularly significant amount of dust.

## **5.3 Residual Effects**

After the implementation of the mitigation measures listed in Appendix D, the significance of each stage of the construction programme will be reduced and the residual significance of impact for the construction project is expected to be Negligible.

## 6 Operational Impacts

### 6.1 Impact on Local Air Quality

As discussed in Section 3.2, an educational development suitability assessment has been carried out by comparing the existing air quality in relation to the relevant air quality objective using a dispersion model approach.

Based on the methodology described in Section 3, the following section provides the results of the predicted concentration at the nearest site boundary of the proposed development.

Table 6.1 to Table 6.3 present predicted NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> pollutant concentrations, respectively.

Table 6.1 presents the NO<sub>2</sub> predicted annual mean concentrations for all modelled facades of the building. The results show that the concentrations of NO<sub>2</sub> are below the AQO.

According to Defra LAQM.TG (22) guidance, exceedance of the one-hour NO<sub>2</sub> mean objective is generally unlikely to occur where annual mean concentrations do not exceed 60µg/m<sup>3</sup>. The annual mean NO<sub>2</sub> concentration at all modelled facades is comfortably lower than 60µg/m<sup>3</sup>, and it is unlikely the one-hour mean will be exceeded for any modelled facade.

Table 6.2 and Table 6.3 show that both PM<sub>10</sub> and PM<sub>2.5</sub> predicted annual mean concentrations for all modelled facades are below the relevant AQO.

Table 6.1: Predicted concentrations of NO<sub>2</sub> of the proposed development on the receptors

| Receptor number                             | Concentration + background (µg/m <sup>3</sup> ) |                  | Percent change (%) | Significance Descriptor | Percent of Air Quality Objective (%) |
|---------------------------------------------|-------------------------------------------------|------------------|--------------------|-------------------------|--------------------------------------|
|                                             | Without Development                             | With Development |                    |                         |                                      |
| R1 - Residential (Horsham Road)             | 15.79                                           | 16.73            | 2.35               | Negligible              | 41.8%                                |
| R2 - Residential (Horsham Road)             | 15.79                                           | 16.73            | 2.35               | Negligible              | 41.8%                                |
| R3 - Steyning Leisure Centre (Horsham Road) | 15.79                                           | 16.54            | 1.88               | Negligible              | 41.4%                                |
| R4 - Residential (Shooting Field)           | 15.79                                           | 16.78            | 2.48               | Negligible              | 42.0%                                |
| R5 - Residential (Shooting Field)           | 15.79                                           | 15.89            | 0.25               | Negligible              | 39.7%                                |
| R6 - Residential (Shooting Field)           | 15.79                                           | 15.89            | 0.25               | Negligible              | 39.7%                                |
| R7 - Residential (Shooting Field)           | 15.79                                           | 15.89            | 0.25               | Negligible              | 39.7%                                |
| R8 - Residential (Shooting Field)           | 15.79                                           | 15.89            | 0.25               | Negligible              | 39.7%                                |
| R9 - Residential (Shooting Field)           | 15.79                                           | 15.84            | 0.13               | Negligible              | 39.6%                                |

| Receptor number                        | Concentration + background ( $\mu\text{g}/\text{m}^3$ ) |                  | Percent change (%) | Significance Descriptor | Percent of Air Quality Objective (%) |
|----------------------------------------|---------------------------------------------------------|------------------|--------------------|-------------------------|--------------------------------------|
|                                        | Without Development                                     | With Development |                    |                         |                                      |
| R10 - Residential (Shooting Field)     | 15.79                                                   | 15.89            | 0.25               | Negligible              | 39.7%                                |
| R11 - Residential (Shooting Field)     | 15.79                                                   | 15.89            | 0.25               | Negligible              | 39.7%                                |
| R12 - Residential (Shooting Field)     | 15.79                                                   | 15.89            | 0.25               | Negligible              | 39.7%                                |
| R13 - Residential (Shooting Field)     | 15.79                                                   | 15.94            | 0.38               | Negligible              | 39.9%                                |
| R14 - Residential (Shooting Field)     | 15.79                                                   | 15.94            | 0.38               | Negligible              | 39.9%                                |
| R15 - Residential (Shooting Field)     | 15.79                                                   | 15.89            | 0.25               | Negligible              | 39.7%                                |
| R16 - Residential (St. Cuthman's Road) | 15.79                                                   | 15.79            | 0.00               | Negligible              | 39.5%                                |
| R17 - Residential (St. Cuthman's Road) | 15.75                                                   | 15.79            | 0.10               | Negligible              | 39.5%                                |
| R18 - Residential (St. Cuthman's Road) | 15.75                                                   | 15.79            | 0.10               | Negligible              | 39.5%                                |
| R19 - Residential (St. Cuthman's Road) | 15.75                                                   | 15.79            | 0.10               | Negligible              | 39.5%                                |
| R20 - Residential (Farnfold Road)      | 15.75                                                   | 15.79            | 0.10               | Negligible              | 39.5%                                |
| R21 - Residential (Henderson Walk)     | 15.75                                                   | 15.75            | 0.00               | Negligible              | 39.4%                                |
| R22 - Residential (Henderson Walk)     | 15.75                                                   | 15.75            | 0.00               | Negligible              | 39.4%                                |
| R23 - Residential (Henderson Walk)     | 15.75                                                   | 15.75            | 0.00               | Negligible              | 39.4%                                |
| R24 - Residential (Cannons Way)        | 15.79                                                   | 15.79            | 0.00               | Negligible              | 39.5%                                |

Table 6.2: Predicted concentrations of PM<sub>10</sub> of the proposed development on the receptors

| Receptor number                 | Concentration + background ( $\mu\text{g}/\text{m}^3$ ) |                  | Percent change (%) | Significance Descriptor | Percent of Air Quality Objective (%) |
|---------------------------------|---------------------------------------------------------|------------------|--------------------|-------------------------|--------------------------------------|
|                                 | Without Development                                     | With Development |                    |                         |                                      |
| R1 - Residential (Horsham Road) | 10.28                                                   | 10.46            | 0.456              | Negligible              | 26.2%                                |
| R2 - Residential (Horsham Road) | 10.28                                                   | 10.46            | 0.461              | Negligible              | 26.2%                                |

| Receptor number                             | Concentration + background ( $\mu\text{g}/\text{m}^3$ ) |                  | Percent change (%) | Significance Descriptor | Percent of Air Quality Objective (%) |
|---------------------------------------------|---------------------------------------------------------|------------------|--------------------|-------------------------|--------------------------------------|
|                                             | Without Development                                     | With Development |                    |                         |                                      |
| R3 - Steyning Leisure Centre (Horsham Road) | 10.26                                                   | 10.39            | 0.338              | Negligible              | 26.0%                                |
| R4 - Residential (Shooting Field)           | 10.29                                                   | 10.51            | 0.552              | Negligible              | 26.3%                                |
| R5 - Residential (Shooting Field)           | 10.34                                                   | 10.69            | 0.869              | Negligible              | 26.7%                                |
| R6 - Residential (Shooting Field)           | 10.33                                                   | 10.65            | 0.805              | Negligible              | 26.6%                                |
| R7 - Residential (Shooting Field)           | 10.34                                                   | 10.74            | 0.980              | Negligible              | 26.8%                                |
| R8 - Residential (Shooting Field)           | 10.34                                                   | 10.74            | 0.991              | Negligible              | 26.8%                                |
| R9 - Residential (Shooting Field)           | 10.31                                                   | 10.60            | 0.729              | Negligible              | 26.5%                                |
| R10 - Residential (Shooting Field)          | 10.35                                                   | 10.76            | 1.045              | Negligible              | 26.9%                                |
| R11 - Residential (Shooting Field)          | 10.33                                                   | 10.72            | 0.963              | Negligible              | 26.8%                                |
| R12 - Residential (Shooting Field)          | 10.32                                                   | 10.69            | 0.907              | Negligible              | 26.7%                                |
| R13 - Residential (Shooting Field)          | 10.35                                                   | 10.81            | 1.139              | Negligible              | 27.0%                                |
| R14 - Residential (Shooting Field)          | 10.38                                                   | 10.91            | 1.325              | Negligible              | 27.3%                                |
| R15 - Residential (Shooting Field)          | 10.32                                                   | 10.69            | 0.921              | Negligible              | 26.7%                                |
| R16 - Residential (St. Cuthman's Road)      | 10.28                                                   | 10.40            | 0.305              | Negligible              | 26.0%                                |
| R17 - Residential (St. Cuthman's Road)      | 10.27                                                   | 10.34            | 0.175              | Negligible              | 25.8%                                |
| R18 - Residential (St. Cuthman's Road)      | 10.26                                                   | 10.32            | 0.149              | Negligible              | 25.8%                                |
| R19 - Residential (St. Cuthman's Road)      | 10.27                                                   | 10.32            | 0.135              | Negligible              | 25.8%                                |
| R20 - Residential (Farnefold Road)          | 10.27                                                   | 10.31            | 0.109              | Negligible              | 25.8%                                |
| R21 - Residential (Henderson Walk)          | 10.25                                                   | 10.29            | 0.098              | Negligible              | 25.7%                                |
| R22 - Residential (Henderson Walk)          | 10.25                                                   | 10.29            | 0.092              | Negligible              | 25.7%                                |
| R23 - Residential (Henderson Walk)          | 10.26                                                   | 10.29            | 0.092              | Negligible              | 25.7%                                |
| R24 - Residential (Cannons Way)             | 10.27                                                   | 10.32            | 0.116              | Negligible              | 25.8%                                |

Table 6.3: Predicted concentrations of PM<sub>2.5</sub> of the proposed development on the receptors

| Receptor number                             | Concentration + background (µg/m <sup>3</sup> ) |                  | Percent change (%) | Significance Descriptor | Percent of Air Quality Objective (%) |
|---------------------------------------------|-------------------------------------------------|------------------|--------------------|-------------------------|--------------------------------------|
|                                             | Without Development                             | With Development |                    |                         |                                      |
| R1 - Residential (Horsham Road)             | 6.07                                            | 6.18             | 0.448              | Negligible              | 30.9%                                |
| R2 - Residential (Horsham Road)             | 6.07                                            | 6.18             | 0.452              | Negligible              | 30.9%                                |
| R3 - Steyning Leisure Centre (Horsham Road) | 6.06                                            | 6.14             | 0.337              | Negligible              | 30.7%                                |
| R4 - Residential (Shooting Field)           | 6.07                                            | 6.20             | 0.499              | Negligible              | 31.0%                                |
| R5 - Residential (Shooting Field)           | 6.10                                            | 6.29             | 0.778              | Negligible              | 31.5%                                |
| R6 - Residential (Shooting Field)           | 6.09                                            | 6.27             | 0.721              | Negligible              | 31.3%                                |
| R7 - Residential (Shooting Field)           | 6.10                                            | 6.32             | 0.875              | Negligible              | 31.6%                                |
| R8 - Residential (Shooting Field)           | 6.10                                            | 6.32             | 0.884              | Negligible              | 31.6%                                |
| R9 - Residential (Shooting Field)           | 6.08                                            | 6.24             | 0.650              | Negligible              | 31.2%                                |
| R10 - Residential (Shooting Field)          | 6.10                                            | 6.33             | 0.931              | Negligible              | 31.7%                                |
| R11 - Residential (Shooting Field)          | 6.09                                            | 6.31             | 0.858              | Negligible              | 31.5%                                |
| R12 - Residential (Shooting Field)          | 6.09                                            | 6.29             | 0.808              | Negligible              | 31.4%                                |
| R13 - Residential (Shooting Field)          | 6.17                                            | 6.63             | 1.822              | Negligible              | 33.1%                                |
| R14 - Residential (Shooting Field)          | 6.20                                            | 6.73             | 2.120              | Negligible              | 33.6%                                |
| R15 - Residential (Shooting Field)          | 6.14                                            | 6.51             | 1.473              | Negligible              | 32.6%                                |
| R16 - Residential (St. Cuthman's Road)      | 6.10                                            | 6.22             | 0.488              | Negligible              | 31.1%                                |
| R17 - Residential (St. Cuthman's Road)      | 6.09                                            | 6.16             | 0.281              | Negligible              | 30.8%                                |
| R18 - Residential (St. Cuthman's Road)      | 6.08                                            | 6.14             | 0.239              | Negligible              | 30.7%                                |
| R19 - Residential (St. Cuthman's Road)      | 6.09                                            | 6.14             | 0.215              | Negligible              | 30.7%                                |
| R20 - Residential (Farnefold Road)          | 6.09                                            | 6.13             | 0.174              | Negligible              | 30.7%                                |
| R21 - Residential (Henderson Walk)          | 6.07                                            | 6.11             | 0.157              | Negligible              | 30.6%                                |

| Receptor number                    | Concentration + background ( $\mu\text{g}/\text{m}^3$ ) |                  | Percent change (%) | Significance Descriptor | Percent of Air Quality Objective (%) |
|------------------------------------|---------------------------------------------------------|------------------|--------------------|-------------------------|--------------------------------------|
|                                    | Without Development                                     | With Development |                    |                         |                                      |
| R22 - Residential (Henderson Walk) | 6.07                                                    | 6.11             | 0.148              | Negligible              | 30.6%                                |
| R23 - Residential (Henderson Walk) | 6.08                                                    | 6.11             | 0.148              | Negligible              | 30.6%                                |
| R24 - Residential (Cannons Way)    | 6.09                                                    | 6.14             | 0.185              | Negligible              | 30.7%                                |

## 6.2 Emissions Mitigation Assessment

As per the Horsham District Planning Framework, the Proposed Development is considered a 'major development' and is required to carry out a damage cost calculation to quantify the health impact of transport emissions, in line with Sussex Air's Emissions Mitigation Guidance. The purpose of this assessment is to calculate a monetary value that will offset air quality impacts of a development once spent on mitigation. This assessment uses the latest version of Defra's Emissions Factor Toolkit (EFT v14.1)<sup>26</sup> to work out the annual impact of additional transport in terms of NO<sub>x</sub> and PM<sub>2.5</sub> emissions (tonnes per year). This is then multiplied by a damage cost assigned to pollutants by Defra. The 2025 average cost per tonne of NO<sub>x</sub> is £4,191 and for PM<sub>2.5</sub> the average cost per tonne is £69,745. Table 6.4 shows the damage cost calculation.

Table 6.4: Damage Cost Calculation

| Pollutant         | Development Emissions (tonnes/year) | Central Present Scenario Damage Cost (£) | 5-year cost (£) | Total Damage Cost (£) |
|-------------------|-------------------------------------|------------------------------------------|-----------------|-----------------------|
| NO <sub>x</sub>   | 1.10211                             | £4,191                                   | £25,981         | £60,690               |
| PM <sub>2.5</sub> | 0.08871                             | £69,745                                  | £34,709         |                       |

The damage cost calculation for the Proposed Development results in a total 5-year damage cost of £60,690. This gives an indication of the level of mitigation that will be required to offset transport emissions associated with the development.

Section 7.2 shows the mitigation measures taken by the client to offset the damage costs of the Proposed Development.

<sup>26</sup> Defra, 2026, Emissions Factor Toolkit Available at: <https://laqm.defra.gov.uk/air-quality/air-quality-assessment/emissions-factors-toolkit/>

## 7 Discussion

### 7.1 Construction Impacts and Mitigation Measures

Mitigation measures have been set out in Appendix D in accordance with mitigation measures set out in the IAQM guidance for construction dust to reduce the potential impacts presented in Section 5.

The risks of construction activities in relation to dust soiling and human health were deemed 'High Risk', and risks in relation to ecological impacts were deemed 'Low'. Therefore, it is recommended that the mitigation measures appropriate to mitigate 'High Risk' effects, as proposed in Appendix D are applied during the construction stage.

### 7.2 Operational Impacts and Mitigation Measures

#### 7.2.1 Impact on Annual Mean NO<sub>2</sub> Concentrations

The predicted annual mean NO<sub>2</sub> impacts of each scenario assessed are described as 'Negligible' from the traffic emissions during the operational stage of the proposed development on the existing ambient air quality, the modelled annual mean concentrations are well below the air quality objective as shown in Table 6.1. No other specific mitigation measures are considered necessary beyond that already included in the project's Travel Plan.

As set out in Section 6.2, the Proposed Development must provide approximately £60,690 of mitigation to offset the Site's 5-year impact, in accordance with Sussex Air Quality Partnership Technical Guidance. The Local Authority will agree the specific measures, including the on-site infrastructure to which the funds will be applied.

The client has committed to installing £600k worth of PV solar panels and 53 EV charging spaces, 18 active and 35 passive, into the development.

Provided the Proposed Development delivers mitigation in line with Sussex Technical Guidance and at the level set out in Table 6.4, it will comply with local guidance and its effect on air quality will not be significant.

#### 7.2.2 Impacts on Annual Mean PM<sub>10</sub> and PM<sub>2.5</sub> Concentrations

The comparison of each scenario assessed indicates that the PM<sub>10</sub> and PM<sub>2.5</sub> annual mean concentrations are predicted to change by a negligible amount from the traffic emissions during the operational stage of the proposed development on the existing ambient air quality. Also, the modelled annual mean concentrations are well below their respective air quality objective as shown in Table 6.2 and Table 6.3.

#### 7.2.3 Heating Source Impacts and Mitigation Measures

The proposed heating strategy should utilise a ground Source Heat Pump valued at £1.2m.

## 8 Conclusion

This report provides an assessment of the following potential key impacts associated with the construction and operational phases of the proposed development at 8 Shooting Field, Steyning, West Sussex BN44 3RX.

- Nuisance, loss of amenity and health impacts associated with the construction stage of the development on sensitive receptors;
- Changes in traffic-related pollutant concentrations associated with the operational stage of the proposed development;
- To demonstrate how the development has considered ways to minimise exposure to sources of air pollution; and
- Suitability of the proposed development location in terms of existing air quality;

A qualitative assessment of construction dust effects has been undertaken for the proposed scheme. The construction stage is predicted to have a 'High Risk' of nuisance and/or loss of amenity impacts due to dust nuisance. However, the risk of dust nuisance can be mitigated by implementing the appropriate mitigation measures listed in Appendix D.

The modelled road emissions for the operational stage of the proposed development predicted the annual mean concentrations for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> to be below each respective air quality objective.

Using the EPUK/IAQM method, the proposed development's modelled road traffic impacts during the operational stage are predicted to have a 'negligible' impact for the NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> annual means to the existing air quality.

An emissions mitigation assessment has been carried out in line with Sussex Air guidance, including a damage cost calculation, and this found that approximately £60,690 is required to be spent on mitigation to offset the transport impact of the development. The client has committed to installing £600k worth of PV solar panels, a ground Source Heat Pump valued at £1.2m and 53 EV charging spaces, 18 active and 35 passive, into the development.

It can, therefore, be concluded that with proper mitigation measures, the proposed educational development is not considered to conflict with any national, regional, or local planning policy in relation to construction and operation phase dust and air quality nuisance.

## Appendices

|             |                                              |
|-------------|----------------------------------------------|
| Appendix A: | Key Pollutants                               |
| Appendix B: | Operational Impact Assessment Methodology    |
| Appendix C: | Construction Dust Assessment Criteria        |
| Appendix D: | Mitigation Measures for Construction Impacts |
| Appendix E: | Model Verification                           |
| Appendix F: | Site Drawings                                |

## Appendix A : Key Pollutants

### A1. Nitrogen Dioxide (NO<sub>2</sub>)

Nitrogen dioxide (NO<sub>2</sub>) and nitric oxide (NO) are collectively referred as oxides of nitrogen (NO<sub>x</sub>). During fuel combustion, atmospheric nitrogen combines with oxygen to form nitric oxide (NO), which is not considered harmful. Through a chemical reaction with ozone (O<sub>3</sub>), however NO can further combine with oxygen to create NO<sub>2</sub> which is harmful to human health and vegetation. The foremost sources of NO<sub>2</sub> in the UK are from combustion sources produced mainly by road traffic and power generation.

### A2. Particulate Matter

Particulate matter is a term which refers to a mixture of solid particles and liquid droplets found in the air. These particles come in many sizes and shapes and can be made up of hundreds of different chemicals. Some particles, such as dust, dirt, soot, or smoke, are large or dark enough to be seen with the naked eye. Others can be so small that they can only be detected using an electron microscope. Fine dust, essentially particles up to 10 microns (µm), is commonly referred to as PM<sub>10</sub>.

PM<sub>10</sub> is known to arise from a number of sources such as construction sites, road traffic movement, industrial and agricultural activities. Very fine particles (PM<sub>2.5</sub> – PM<sub>0.1</sub>) are known to be associated with pollutants such as oxides of nitrogen (NO<sub>x</sub>) and sulphur dioxide (SO<sub>2</sub>) emitted from power plants, industrial installation and road transport sources.

PM<sub>2.5</sub> is generally associated with combustion and traffic sources and is more likely to be associated with the operational phase of the proposed development.

### A3. 'Disamenity' Dust

'Dust' is generally regarded as particulate matter up to 75µm (micron) diameter and in an environmental context can be considered in two categories, according to size: coarser dust (essentially particles greater than 10µm) and fine particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) as set out above. Coarser dust (essentially particles greater than 10µm) is generally regarded as 'disamenity dust' and can be associated with annoyance, although there are no official standards (such as AQO) for dust annoyance. Disamenity dust is more readily described than defined as it relates to the visual impact of short-lived dust clouds and the long-term soiling of surfaces.

Although it is a widespread environmental phenomenon, dust is also generated through many human activities including industrial and materials handling sites, construction and demolition sites and roads. Dust is generally produced by mechanical action on materials and is carried by moving air when there is sufficient energy in the airstream. More energy is required for dust to become airborne than for it to remain suspended.

## Appendix B : Operational Impact Assessment Methodology

The EPUK & IAQM guidance refers to the Town and Country Planning (Development Management Procedure) Order (England) 2010 [(Wales) 2012] for a definition of a 'major' development when scoping assessments required for the planning process. Based on the guidance, a 'major' development is such development where:

- The number of dwellings is 10 or above;
- The residential development is carried out of a site of more than 0.5ha where the number of dwellings is unknown;
- The provision of more than 1,000 m<sup>2</sup> commercial floorspace; or,
- Development carried out on land of 1ha or more.

It is recommended that consideration should be given to reduce impacts from any 'major' developments by considering:

- The impact of existing sources in the local area on the proposed development; and
- The impacts of the proposed development on the local area.

The assessment process involves two stages where:

**Stage 1** scope out the need for an air quality assessment and **Stage 2** provide guidance of determining the level of assessment required for a project.

Table B 1 below sets out the Stage 1 criteria to determine the need to assess impacts arising from small developments and Table B 2 provides more specific guidance as to when an air quality assessment is likely to be required to assess the impacts of the proposed development on the local area.

Table B 1: Stage 1 Criteria to proceed to Stage 2

| Criteria to Proceed to Stage 2 |                                                                                                                                                                                                                                                                 |
|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A                              | <p>If any of the following apply:</p> <ul style="list-style-type: none"> <li>• or more residential units of a site area of more than 0.5ha</li> <li>• More than 1,000m<sup>2</sup> of floor space for all other uses or a site area greater than 1ha</li> </ul> |
| B                              | <p>Coupled with any of the following:</p> <ul style="list-style-type: none"> <li>• The development has more than 10 parking spaces</li> <li>• The development will have a centralised energy facility or other centralised combustion process</li> </ul>        |

Table B 2: Indicative Criteria for Requiring an Air Quality Assessment

| The development will                                                                                                                                                                                                                                                  | Indicative Criteria to Proceed to an Air Quality Assessment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. Cause a significant change in Light Duty Vehicle (LDV) traffic flows on local roads with relevant receptors. (LDV = cars and small vans <3.5t gross vehicle weight).                                                                                               | A change of LDV flows of:<br>- more than 100 AADT within or adjacent to an AQMA<br>- more than 500 AADT elsewhere.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2. Cause a significant change in Heavy Duty Vehicle (HDV) flows on local roads with relevant receptors. (HDV = goods vehicles + buses >3.5t gross vehicle weight).                                                                                                    | A change of HDV flows of:<br>- more than 25 AADT within or adjacent to an AQMA<br>- more than 100 AADT elsewhere.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 3. Realign roads, i.e. changing the proximity of receptors to                                                                                                                                                                                                         | Where the change is 5m or more and the road is within an AQMA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 4. Introduce a new junction or remove an existing junction near to relevant receptors.                                                                                                                                                                                | Applies to junctions that cause traffic to significantly change vehicle accelerate/decelerate, e.g. traffic lights, or roundabouts.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 5. Introduce or change a bus station.                                                                                                                                                                                                                                 | Where bus flows will change by:<br>- more than 25 AADT within or adjacent to an AQMA<br>- more than 100 AADT elsewhere.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 6. Have an underground car park with extraction system.                                                                                                                                                                                                               | The ventilation extract for the car park will be within 20 m of a relevant receptor.<br>Coupled with the car park having more than 100 movements per day (total in and out).                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 7. Have one or more substantial combustion processes, where there is a risk of impacts at relevant receptors.<br>NB. this includes combustion plant associated with standby emergency generators (typically associated with centralised energy centres) and shipping. | Typically, any combustion plant where the single or combined NO <sub>x</sub> emission rate is less than 5 mg/sec is unlikely to give rise to impacts, provided that the emissions are released from a vent or stack in a location and at a height that provides adequate dispersion.<br>In situations where the emissions are released close to buildings with relevant receptors, or where the dispersion of the plume may be adversely affected by the size and/or height of adjacent buildings (including situations where the stack height is lower than the receptor) then consideration will need to be given to |

potential impacts at much lower emission rates.

Conversely, where existing nitrogen dioxide concentrations are low, and where the dispersion conditions are favourable, a much higher emission rate may be acceptable.

---

## Appendix C : Construction Dust Assessment Criteria

IAQM guidance framework on assessing the risk of dust proposes the construction phase should be split into phases dependent on their potential impacts, determining the risk for each individually. Therefore, this assessment has determined the risk of the four construction categories put forward by the IAQM guidance:

- Demolition;
- Earthworks;
- Construction; and
- Trackout (transport of dust and dirt onto the public road network).

The IAQM guidance framework states that the risk of dust impacts from the four categories can be defined as 'negligible', 'low risk', 'medium risk' or 'high risk' depending upon the scale and nature of the construction activity and the sensitivity and proximity of receptors to the construction site boundary. This categorisation is used to put forward appropriate mitigation measures, reducing the level of effects from the dust impacts so they are not significant.

The assessment of dust impacts using the IAQM guidance considers three separate effects from dust:

- Annoyance due to dust soiling;
- Harm to ecological receptors; and
- The risk of health effects due to significant increase in exposure to PM<sub>10</sub>.

Step 1 of the assessment is set out to screen for the requirement for a more detailed assessment for the proposed development. The screening criteria states:

A 'human receptor' within:

- 250 m of the boundary of the application site; or
- 50 m of the route(s) used by construction vehicles on the public highway, up to 500 m from the site entrance(s).

An 'ecological receptor' within:

- 50 m of the boundary of the application site; or
- 50 m of the route(s) used by construction vehicles on the public highway, up to 250m from the site entrance(s).

Where there are no receptors and the level of risk is deemed 'negligible', there is no need for further assessment.

Step 2A of the assessment enables the overall dust emission magnitude (small, medium or large) from each dust source (demolition, earthworks, construction and trackout) to be identified in relation with the criteria outlined in Table C 1.

Table C 1: Dust emission magnitude

| Source       | Large                                                                                                                                                                                                                                                                                     | Medium                                                                                                                                                                                                                                                       | Small                                                                                                                                                                                                                                                |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Demolition   | Total building volume >50,000 m <sup>3</sup> , potentially dusty construction material (e.g. concrete), on-site crushing and screening, demolition activities >20 m above ground level.                                                                                                   | Total building volume 20,000 m <sup>3</sup> – 50,000 m <sup>3</sup> , potentially dusty construction material, demolition activities <10 – 20 m above ground level.                                                                                          | Total building volume <20,000 m <sup>3</sup> , construction material with low potential for dust release (e.g. metal cladding or timber), demolition activities <10 m above ground, demolition during wetter months.                                 |
| Earthworks   | Total site area >10,000 m <sup>2</sup> , potentially dusty soil type (e.g. clay, which will be prone to suspension when dry due to small particle size), >10 heavy earth moving vehicles active at any one time, formation of bunds >8 m in height, total material moved >100,000 tonnes. | Total site area 2,500 m <sup>2</sup> – 10,000 m <sup>2</sup> , moderately dusty soil type (e.g. silt), 5-10 heavy earth moving vehicles active at any one time, formation of bunds 4 m – 8 m in height, total material moved 20,000 tonnes – 100,000 tonnes. | Total site area <2,500 m <sup>2</sup> , soil type with large grain size (e.g. sand), <5 heavy earth moving vehicles active at any one time, formation of bunds <4 m in height, total material moved <20,000 tonnes, earthworks during wetter months. |
| Construction | Total building volume >100,000 m <sup>3</sup> , on site concrete batching or sandblasting.                                                                                                                                                                                                | Total building volume 25,000 m <sup>3</sup> – 100,000 m <sup>3</sup> , potentially dusty construction material (e.g. concrete), on site concrete batching.                                                                                                   | Total building volume <25,000 m <sup>3</sup> , construction material with low potential for dust release (e.g. metal cladding or timber).                                                                                                            |
| Track out    | >50 HDV (>3.5t) outward movements <sup>a</sup> in any one day <sup>b</sup> , potentially dusty surface                                                                                                                                                                                    | 10-50 HDV (>3.5t) outward movements <sup>a</sup> in any one day <sup>b</sup> , moderately dusty                                                                                                                                                              | <10 HDV (>3.5t) outward movements <sup>a</sup> in any one day <sup>b</sup> , surface material with low                                                                                                                                               |

| Source | Large                                                          | Medium                                                                       | Small                                                  |
|--------|----------------------------------------------------------------|------------------------------------------------------------------------------|--------------------------------------------------------|
|        | material (e.g. high clay content), unpaved road length >100 m. | surface material (e.g. high clay content), unpaved road length 50 m – 100 m. | potential for dust release, unpaved road length <50 m. |

Notes: <sup>a</sup>Vehicle movement is a one-way journey. i.e. from A to B, and excludes the return journey.

<sup>b</sup> HDV movements during a construction project vary over its lifetime, and the number of movements is the maximum not the average.

Step 2B allows for the sensitivity of the area (high, medium or low) to be assessed and takes into account a number of factors:

- The specific sensitivities of receptors in the area;
- The proximity and number of those receptors;
- In the case of PM<sub>10</sub>, the existing local background concentration; and
- Site specific factors, such as whether there are natural shelters, such as trees, to reduce the risk of wind-blown dust.

Receptor sensitivity has been based on the highest of any criteria being met thus, the assessment is considered as robust. The sensitivity of the area is further determined for dust soiling, human health and ecosystem effects by considering the criteria presented in Table C 2.

Table C 2: Magnitude of Receptor Sensitivity

| Source                                          | High                                                                                                                                                                                                                                                                                                                                                        | Medium                                                                                                                                                                                                                                                                                                                                                                                                                 | Low                                                                                                                                                                                                                                                                                                                                                                                                           |
|-------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sensitivities of people to dust soiling effects | <ul style="list-style-type: none"> <li>• Users can reasonably expect enjoyment of a high level of amenity; or</li> <li>• The appearance, aesthetics or value of their property would be diminished by soiling; and</li> <li>• The people or property would reasonably be expected to be present continuously, or at least regularly for extended</li> </ul> | <ul style="list-style-type: none"> <li>• Users would expect<sup>a</sup> to enjoy a reasonable level of amenity, but would not reasonably expect<sup>a</sup> to enjoy the same level of amenity as in their home; or</li> <li>• The appearance, aesthetics or value of their property could be diminished by soiling; or</li> <li>• The people or property wouldn't reasonably be expected<sup>a</sup> to be</li> </ul> | <ul style="list-style-type: none"> <li>• The enjoyment of amenity would not reasonably be expected<sup>a</sup>; or</li> <li>• Property would not reasonably be expected<sup>a</sup> to be diminished in appearance, aesthetics or value by soiling; or</li> <li>• There is transient exposure, where the people or property would reasonably be expected to be present only for limited periods of</li> </ul> |

| Source                                                        | High                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Medium                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Low                                                                                                                                                                                                                                                                        |
|---------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                               | <p>periods, as part of the normal pattern of use of the land.</p> <ul style="list-style-type: none"> <li>Indicative examples include dwellings, museums and other culturally important collections, medium and long term car parks<sup>b</sup> and car showrooms.</li> </ul>                                                                                                                                                                                                                                                                                         | <p>present here continuously or regularly for extended periods as part of the normal pattern of use of the land.</p> <ul style="list-style-type: none"> <li>Indicative examples include parks and places of work.</li> </ul>                                                                                                                                                                                                                                                                                                                                               | <p>time as part of the normal pattern of use of the land.</p> <ul style="list-style-type: none"> <li>Indicative examples include playing fields, farmland (unless commercially-sensitive horticultural), footpaths, short term car parks<sup>b</sup> and roads.</li> </ul> |
| Sensitivities of people to health effects of PM <sub>10</sub> | <ul style="list-style-type: none"> <li>Locations where members of the public are exposed over a time period relevant to the air quality objective for PM<sub>10</sub> (in the case of the 24-hour objectives, a relevant location would be one where individuals may be exposed for eight hours or more in a day).<sup>c</sup></li> <li>Indicative examples include residential properties. Hospitals, schools and residential care homes should also be considered as having equal sensitivity to residential areas for the purposes of this assessment.</li> </ul> | <ul style="list-style-type: none"> <li>Locations where the people exposed are workers<sup>d</sup>, and exposure is over a time period relevant to the air quality objective for PM<sub>10</sub> (in the case of the 24-hour objectives, a relevant location would be one where individuals may be exposed for eight hours or more in a day).</li> <li>Indicative examples include office and shop workers, but will generally not include workers occupationally exposed to PM<sub>10</sub>, as protection is covered by Health and Safety at Work legislation.</li> </ul> | <ul style="list-style-type: none"> <li>Locations where human exposure is transient.<sup>e</sup></li> <li>Indicative examples include public footpaths, playing fields, parks and shopping streets.</li> </ul>                                                              |

| Source                                           | High                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Medium                                                                                                                                                                                                                                                                                                                                                                                    | Low                                                                                                                                                                                                                             |
|--------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Sensitivities of receptors to ecological effects | <ul style="list-style-type: none"> <li>Locations with an international or national designation and the designated features may be affected by dust soiling; or</li> <li>Locations where there is a community of a particularly dust sensitive species such as vascular species included in the Red Data List For Great Britain.</li> <li>Indicative examples include a Special Area of Conservation (SAC) designated for acid heathlands or a local site designated for lichens adjacent to the demolition of a large site containing concrete (alkali) buildings.</li> </ul> | <ul style="list-style-type: none"> <li>Locations where there is a particularly important plant species, where its dust sensitivity is uncertain or unknown; or</li> <li>Locations with a national designation where the features may be affected by dust deposition.</li> <li>Indicative example is a Site of Special Scientific Interest (SSSI) with dust sensitive features.</li> </ul> | <ul style="list-style-type: none"> <li>Locations with a local designation where the features may be affected by dust deposition.</li> <li>Indicative example is a local Nature Reserve with dust sensitive features.</li> </ul> |

Notes: <sup>a</sup> People's expectations will vary depending on the existing dust deposition in the area, see Section 4.2.

<sup>b</sup> Car parks can have a range of sensitivities depending on the duration and frequency that people would be expected to park their cars there, and the level of amenity they could reasonably expect whilst doing so. Car parks associated with work place or residential parking might have a high level of sensitivity compared to car parks used less frequently and for shorter durations, such as those associated with shopping. Cases should be examined on their own merits.

<sup>c</sup> This follows Defra guidance as set out in LAQM.TG (09).

<sup>d</sup> Notwithstanding the fact that the air quality objectives and limit values do not apply to people in the workplace, such people can be affected to exposure of PM10. However, they are considered to be less sensitive than the general public as a whole because those most sensitive to the effects of air pollution, such as young children are not normally workers. For this reason workers have been included in the medium sensitivity category.

<sup>e</sup> There are no standards that apply to short-term exposure, e.g. one or two hours, but there is still a risk of health impacts, albeit less certain.

<sup>f</sup> Cheffing C. M. & Farrell L. (Editors) (2005), The Vascular Plant. Red Data List for Great Britain, Joint Nature Conservation Committee.

The final step, step 2C allows for the risk of impacts to be defined. The dust emission magnitude derived in step 2A is combined with the sensitivity of the area defined in step 2B to determine the risk of effects on:

- Annoyance due to dust soiling;
- Harm to ecological receptors; and
- The risk of health effects due to an increase in exposure to PM<sub>10</sub>.

The criteria for each of the dust sources are presented in Table C 3, Table C 4, Table C 5 and Table C 6.

Table C 3: Demolition

| Sensitivity of Area | Dust Emission Magnitude |             |             |
|---------------------|-------------------------|-------------|-------------|
|                     | Large                   | Medium      | Small       |
| High                | High Risk               | Medium Risk | Medium Risk |
| Medium              | High Risk               | Medium Risk | Low Risk    |
| Low                 | Medium Risk             | Low Risk    | Negligible  |

Table C 4: Earthworks

| Sensitivity of Area | Dust Emission Magnitude |             |            |
|---------------------|-------------------------|-------------|------------|
|                     | Large                   | Medium      | Small      |
| High                | High Risk               | Medium Risk | Low Risk   |
| Medium              | Medium Risk             | Medium Risk | Low Risk   |
| Low                 | Low Risk                | Low Risk    | Negligible |

Table C 5: Construction

| Sensitivity of Area | Dust Emission Magnitude |             |            |
|---------------------|-------------------------|-------------|------------|
|                     | Large                   | Medium      | Small      |
| High                | High Risk               | Medium Risk | Low Risk   |
| Medium              | Medium Risk             | Medium Risk | Low Risk   |
| Low                 | Low Risk                | Low Risk    | Negligible |

Table C 6: Track out

| Sensitivity of Area | Dust Emission Magnitude |             |            |
|---------------------|-------------------------|-------------|------------|
|                     | Large                   | Medium      | Small      |
| High                | High Risk               | Medium Risk | Low Risk   |
| Medium              | Medium Risk             | Medium Risk | Negligible |
| Low                 | Low Risk                | Low Risk    | Negligible |

## Appendix D : IAQM Highly Recommended Mitigation Measures for Sites with a High Risk of Dust Impacts

Please refer to the IAQM's Guidance on the Assessment of Dust from Demolition and Construction (2024) and Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites (2018) for further, "desirable", mitigation measures:

### Communications

- Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.
- Display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary. This may be the environment manager/engineer or the site manager.
- Display the head or regional office contact information.
- Develop and implement a Dust Management Plan (DMP), which may include measures to control other emissions, approved by the Local Authority. The level of detail will depend on the risk and should include as a minimum the highly recommended measures in this document. The desirable measures should be included as appropriate for the site. The DMP may include monitoring of dust deposition, dust flux, real time PM<sub>10</sub> continuous monitoring and/or visual inspections.

### Site Management

- Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken.
- Make the complaints log available to the local authority when asked.
- Record any exceptional incidents that cause dust and/or air emissions, either on- or off- site, and the action taken to resolve the situation in the logbook.
- Hold regular liaison meetings with other high risk construction sites within 250 m of the site boundary, to ensure plans are co-ordinated and dust and particulate matter emissions are minimised. It is important to understand the interactions of the off-site transport/deliveries which might be using the same strategic road network routes.

### Monitoring

- Undertake daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, record inspection results, and make the log available to the local authority when asked. This should include regular dust soiling checks of surfaces such as street furniture, cars and windowsills within 100 m of site boundary, with cleaning to be provided if necessary.
- Carry out regular site inspections to monitor compliance with the DMP, record inspection results, and make an inspection log available to the local authority when asked.

- Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.
- Agree dust deposition, dust flux, or real-time PM<sub>10</sub> continuous monitoring locations with the Local Authority. Where possible commence baseline monitoring at least three months before work commences on site or, if it a large site, before work on a phase commences. Further guidance is provided by IAQM on monitoring during demolition, earthworks and construction.

### Preparing and Maintaining the Site

- Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible.
- Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site.
- Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period.
- Avoid site runoff of water or mud.
- Keep site fencing, barriers and scaffolding clean using wet methods.
- Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below.
- Cover, seed or fence stockpiles to prevent wind whipping.

### Operating Vehicle/Machinery and Sustainable Travel

- Ensure all vehicles switch off engines when stationary - no idling vehicles.
- Avoid the use of diesel- or petrol- powered generators and use mains electricity or battery powered equipment where practicable.
- Impose and signpost a maximum-speed-limit of 15 mph on surfaced and 10 mph on unsurfaced haul roads and work areas (if long haul routes are required these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authority, where appropriate).
- Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.
- Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).

### Operations

- Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.

- Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate.
- Use enclosed chutes and conveyors and covered skips.
- Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.
- Ensure equipment is readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.

### Waste Management

- Avoid bonfires and burning of waste materials.

### Demolition

- Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust).
- Ensure effective water suppression is used during demolition operations. Hand held sprays are more effective than hoses attached to equipment as the water can be
- directed to where it is needed. In addition high volume water suppression systems,
- manually controlled, can produce fine water droplets that effectively bring the dust
- particles to the ground.
- Avoid explosive blasting, using appropriate manual or mechanical alternatives.
- Bag and remove any biological debris or damp down such material before demolition.

### Earthworks

- Re-vegetate earthworks and exposed areas/soil stockpiles to stabilise surfaces as soon as practicable.
- Use Hessian, mulches or trackifiers where it is not possible to re-vegetate or cover with topsoil, as soon as practicable.
- Only remove the cover in small areas during work and not all at once.

### Construction

- Avoid scabbling (roughening of concrete surfaces) if possible.
- Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.
- Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery.

- For smaller supplies of fine power materials ensure bags are sealed after use and stored appropriately to prevent dust.

### Trackout

- Use water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site. This may require the sweeper being continuously in use.
- Avoid dry sweeping of large areas.
- Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport.
- Inspect on-site haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.
- Record all inspections of haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowzers and regularly cleaned.
- Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems, or mobile water bowzers and regularly cleaned.
- Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).
- Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.
- Access gates to be located at least 10 m from receptors where possible.

## Appendix E : Model Verification

The model verification process includes checks which are carried out to determine the performance of a dispersion model and ensure monitoring results are not bias due to any model uncertainties. Uncertainties are associated with multiple modelling inputs including:

- traffic flows,
- speeds and vehicle splits;
- emissions estimates;
- background concentrations;
- meteorological data; and
- surface roughness, length and terrain.

Model verification is mainly undertaken by comparing modelled results with monitoring data. Uncertainties and differences in data can be identified and resolved by model refinement or adjustment of the model output using a verification factor. The verification factor can be calculated in accordance with the LAQM TG (22) guidance.

Model verification was only carried out for nitrogen dioxide (NO<sub>2</sub>) as no suitable background concentrations for PM<sub>10</sub> and PM<sub>2.5</sub> were found for the modelled road network.

### E1. Methodology

Based on the LAQM TG (22) guidance produced by Defra, verification of NO<sub>2</sub> concentrations has been carried out using data collected at diffusion tube monitoring sites near the proposed development. Table E.1 presents the monitoring data used within the model verification for NO<sub>2</sub>.

Table E. 1: Relevant NO<sub>2</sub> Monitoring Data Used for Model Verification

| <b>Site name</b>   | <b>Monitor type</b> | <b>2024 NO<sub>2</sub> Annual Mean<br/>(µg/m<sup>3</sup>)</b> |
|--------------------|---------------------|---------------------------------------------------------------|
| <b>HO2</b>         | Automatic Monitor   | 15.7                                                          |
| <b>Henfield 1n</b> | Diffusion Tube      | 16.6                                                          |

Table E.2 presents the Defra background concentrations used within the model. Road contributions were not removed from background concentrations to ensure a worst-case scenario.

Table E. 2: Relevant Background Concentrations Used for Model Verification

| <b>Verification Site name</b> | <b>2024 NO<sub>x</sub> Background Annual Mean (µg/m<sup>3</sup>)</b> | <b>2024 NO<sub>2</sub> Background Annual Mean (µg/m<sup>3</sup>)</b> |
|-------------------------------|----------------------------------------------------------------------|----------------------------------------------------------------------|
| <b>HO2</b>                    | 9.86                                                                 | 7.70                                                                 |
| <b>Henfield 1n</b>            | 9.86                                                                 | 7.70                                                                 |

## E2. Verification Results

Table E.3 presents the monitored and modelled annual mean NO<sub>2</sub> concentrations along with the percentage difference after the verification method was applied. An adjustment factor was then derived by comparing the modelled road NO<sub>x</sub> contribution against the monitored road NO<sub>x</sub> contribution.

Table E. 3: Comparison of monitored and modelled road NO<sub>2</sub> contribution

| <b>Site name</b>   | <b>Monitored NO<sub>2</sub> (µg/m<sup>3</sup>)</b> | <b>Modelled NO<sub>2</sub> (µg/m<sup>3</sup>)</b> | <b>Difference in percentage</b> |
|--------------------|----------------------------------------------------|---------------------------------------------------|---------------------------------|
| <b>HO2</b>         | 15.7                                               | 14.6                                              | -7.2                            |
| <b>Henfield 1n</b> | 16.6                                               | 11.4                                              | -31.3                           |

Based on the methodology presented in LAQM TG (22) guidance, **an adjustment factor of 1.2213** was estimated and applied to all road NO<sub>x</sub> contributions to take account of systematic bias.

## Appendix F : Site Drawings

Please see planning portal for the most recent drawings submitted as part of the planning application.