



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DC/26/0660
LOCATION:	Ingfield Manor School Ingfield Manor Drive Five Oaks Billingshurst West Sussex RH14 9AX
DESCRIPTION:	Expansion of the existing school including the construction of 3 linked single-storey buildings, a sports hall, playground, parking, landscaping, drainage, and associated development, following demolition of redundant buildings.
RECOMMENDATION:	More Information
SUMMARY OF COMMENTS & RECOMMENDATION: Comments relating to below information: Mayer Brown's Air Quality Assessment (dated April 2026)	

MAIN COMMENTS:

We appreciate the applicant is doing more than required and taking a conservative approach to the damage cost and mitigation measures. We accept the proposed mitigation.

An Interim Planning Guidance on the consideration of the Environmental Act PM_{2.5} target in planning decisions was published in October 2024. Applicants are advised to provide evidence in their planning applications that they have identified key sources of air pollution within their schemes and taken appropriate action to minimise emissions of PM_{2.5} and its precursors as far as is reasonably practicable.

1. How has exposure to PM_{2.5} been considered when selecting the development site? *Applicants are advised to consider the following in their application:*
 - Site proximity to people (particularly large populations and/or vulnerable groups, e.g. schools, hospitals, care homes, areas of deprivation) and the impact of the development on these,
 - Site proximity to pollution sources and the impact of these on users of the development,
 - Exposure and emissions during both construction and in-use.
2. What actions and/or mitigations have been considered to reduce PM_{2.5} exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of PM_{2.5} and its precursors? *Applicants are advised to explain (with evidence where possible) why each measure was implemented. Or, if no mitigation measures have been implemented, why this was not proposed. Actions can refer to, but are not limited to, the following:*
 - Site layout,
 - The development's design,
 - Technology used in the construction or installed for use in the development,
 - Construction and future use of the development.

ANY RECOMMENDED CONDITIONS:

During site clearance, preparation and construction there is the potential for local residents to experience adverse impacts from noise, dust and construction traffic movements. These should be minimised and controlled by the developer and a construction environmental management (CEMP) plan is recommended as a condition:

Condition: The development hereby approved shall not commence until a Construction and Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. During site clearance, preparation and construction the dust and Air Emission Mitigation measures described in Appendix C of the Air Quality Assessment report (Mayer Brown, April 2026) shall be adopted. The CEMP shall include details of the following relevant measures:

- i. An introduction consisting of construction phase environmental management plan, definitions and abbreviations and project description and location;
- ii. A description of management responsibilities;
- iii. A description of the construction programme which identifies activities likely to cause high levels of noise or dust;
- iv. Site working hours and a named person for residents to contact;
- v. Detailed Site logistics arrangements;
- vi. Details regarding parking, deliveries, and storage;
- vii. Details regarding dust and noise mitigation measures to be deployed including identification of sensitive receptors and ongoing monitoring;
- viii. Details of the hours of works and other measures to mitigate the impact of construction on the amenity of the area and safety of the highway network; and
- ix. Communication procedures with HDC and local community regarding key construction issues – newsletters, fliers etc.
- x. Details of traffic construction routing to and from the site The construction shall thereafter be carried out in accordance with the details and measures approved in the CEMP for the related phase.

Reason: As this matter is fundamental in order to consider the potential impacts on the amenity of nearby occupiers during construction and in accordance with Policy 33 of the Horsham District Planning Framework (2015).

Should the proposed development be approved, we would like to see the provision of air quality mitigation secured by a condition and we therefore recommend the below:

Condition: The new development should not be operational until an air quality mitigation plan has been submitted to and approved in writing by the Local Planning Authority. The air quality mitigation plan shall contain measures equal in value to the calculated environmental damage cost of £3,741 and include (but not be limited to) the measures detailed in Table 6.1 of the Mayer Brown Air Quality Assessment (dated April 2026):

- 4 additional electric vehicle charging points.

Reason: To mitigate against the impact of the development in accordance with Policy 24 of the Horsham District Planning Framework (2015) and Air quality and emissions mitigation guidance for Sussex (2021).

NAME:	Isabelle Carter
DEPARTMENT:	Environmental Health and Licensing
DATE:	11/06/2026