



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DC/26/0266
LOCATION:	Thakeham Mushrooms Storrington Road Thakeham Pulborough West Sussex RH20 3DY
DESCRIPTION:	Demolition of existing buildings and the redevelopment of the site to provide 150 dwellings, including affordable housing, land for the community land trust, works to public right of way and associated landscaping, open space and infrastructure
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: Air Quality Assessment by Cass Allen Dated February 2026 Emission Mitigation Plan by Cass Allen Dated January 2026	

MAIN COMMENTS:

Having reviewed the submitted Air Quality Assessment (Cass Allen, February 2026) and the accompanying Emissions Mitigation Plan, I provide the following comments:

I agree with the applicants' calculations from the EFT. However, the applicant has used a 2031 price base year within their damage cost calculation. This is more conservative than standard practice, as it yields a higher emissions cost compared with using the price base year applicable to the date the assessment was prepared (2026). While the Council is willing to accept the applicant's figure, the applicant may wish to recalculate the damage costs using the correct 2026 price base year, in line with standard Defra Appraisal Guidance. This will not affect the Council's conclusions but is offered for accuracy and consistency.

Paragraph 8.4 of the AQA incorrectly states that no mitigation is required. Under the Air Quality and Emissions Mitigation Guidance for Sussex (2021), all major developments are required to quantify and fully offset their emissions through a mitigation package, regardless of modelled pollutant concentrations.

Despite paragraph 8.4, the applicant has submitted an Emissions Mitigation Plan. The proposed travel vouchers and electric bicycles are acceptable and sufficient to cover the required damage cost. Improvements to cycle paths cannot be accepted as mitigation as this is already required through planning, and evergreen infrastructure cannot be accepted because it can't be quantified for air quality benefit.

Section 8 of the AQA notes that PM_{2.5} concentrations at the site are well below the relevant objective, which partly addresses exposure. However, under Defra's Interim PM_{2.5} Planning Guidance (2024), applicants must also demonstrate that they have:

- Identified the key PM_{2.5} sources associated with the development, and
- Taken appropriate action to minimise both emissions and exposure as far as reasonably practicable, ideally from the design stage.

The current AQA does not provide this. A short supplementary statement is therefore required setting out:

- How the applicant has identified the main PM_{2.5} sources for the proposed scheme; and
- What practicable steps have been taken to minimise emissions and exposure, in line with Defra's interim expectations (qualitative evidence is acceptable where quantitative assessment is not available).

This additional information is needed to fully comply with Defra's PM_{2.5} planning requirements.

The Air Quality Assessment does not provide enough information on construction traffic emissions. Although it states that construction traffic is "not expected to exceed the criteria," no supporting data is provided, such as expected construction vehicle numbers, HDV percentages, phasing assumptions, or haul routes. Without this, compliance with the EPUK/IAQM screening criteria cannot be verified. The applicant should provide a short summary confirming expected construction traffic movements and demonstrating that these fall below the relevant thresholds.

In addition, the construction phase section does not commit the developer to any specific mitigation measures. The report lists generic IAQM "High Risk Site" controls but does not confirm that these will be implemented or secured through a Construction Environmental Management Plan (CEMP). A CEMP condition is therefore required.

Condition

Construction Environmental Management Plan (CEMP)

No development shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority (LPA). The CEMP shall include, but not be limited to:

1. Air Quality and Dust Management

- Full implementation of all relevant IAQM High-Risk Site mitigation measures for demolition, earthworks, construction and trackout.
- Identification of a named person responsible for dust and air-quality management.

2. Construction Traffic Management

- Details of anticipated construction vehicle numbers, HDV proportions, access arrangements and haul routes.
- Measures to minimise emissions from construction vehicles, including no-idling requirements.

3. Site Management and Monitoring

- Arrangements for recording and responding to air-quality complaints.
- Procedures for site inspections and reactive actions during dry/windy conditions.
- Details of any dust or PM monitoring, where required.

4. Other Standard Environmental Controls

- Measures to prevent contaminated run-off, waste control, storage of materials and any other relevant environmental safeguards.
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The development shall be carried out in full accordance with the approved CEMP for the duration of the construction phase unless otherwise agreed in writing by the LPA.

Reason:

To ensure that construction-phase impacts, including construction traffic emissions and dust, are appropriately managed and minimised in accordance with IAQM guidance and to protect local air quality

NAME:	Georgina Hermitage
DEPARTMENT:	Environmental Health and Licensing
DATE:	13/03/2026