



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	NC/26/0002
LOCATION:	Cemex Small Dole Landfill Henfield Road Small Dole BN5 9XJ
DESCRIPTION:	Proposed importation of inert restoration materials and reprofiling to provide an attenuation layer to mitigate the impact of climate change by improving long term sustainable management of leachate, temporary diversion of FP2774 and nature conservation, biodiversity and landscape improvements.
RECOMMENDATION:	More Information
SUMMARY OF COMMENTS & RECOMMENDATION: Comments relating to below information: Cemex Ltd Environmental Statement, dated January 2026	

MAIN COMMENTS:

This is considered a major development, therefore it is required that the applicant provide an air quality assessment and an emissions mitigation statement, which must include a damage cost calculation. The mitigation measures for the proposed development should be in line with the Sussex Air (2021) Air Quality and Emissions Mitigation Guidance for Sussex. It is recommended that the emission mitigation statement contain itemised costing for each proposed mitigation option and total value of all proposed emissions' mitigation. This should be equal to the value from Emissions calculation and total calculated value of emissions' health damage cost. Sussex Air quality guidance aims to avoid the duplication of measures that would normally be required through other regimes.

The monitoring data for 2024 is available to include in the report, however using the 2023 data can be a more conservative approach, as the concentrations were higher. This approach is acceptable.

The Euro classes of the fleet vehicles have been noted. Could more detail be provided on the NRMM, i.e. number of bulldozers and dump trucks, and their emission stages?

We note the reference throughout to Guidance on the Assessment of Mineral Dust Impacts for Planning. This is currently under full review to address gaps including PM2.5, health impacts, and modern monitoring approaches. In light of this, the applicant should expand the assessment to include and commit to on-site monitoring of both PM10 and PM2.5 to ensure impacts are properly characterised and mitigation can be validated.

In addition to this guidance, the Guidance on the assessment of dust from demolition and construction would also be relevant as this development would be covered under "Earthworks". The mitigation from this guidance is largely similar to the aforementioned guidance, but there are some additional measures that could be considered as they are relevant to the site e.g. display the name and contact details of person(s) accountable for air quality and dust issues on the site boundary.

ANY RECOMMENDED CONDITIONS:

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, dust mitigation measures 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).

NAME:	Isabelle Carter
DEPARTMENT:	Environmental Health and Licensing
DATE:	16/02/2026