



Horsham  
District  
Council

## HORSHAM DISTRICT COUNCIL CONSULTATION

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| <b>TO:</b>                                                                                                                                                  | Development Control                                                                                                                                                        |
| <b>FROM:</b>                                                                                                                                                | Environmental Health and Licensing                                                                                                                                         |
| <b>REFERENCE:</b>                                                                                                                                           | DC/26/0355                                                                                                                                                                 |
| <b>LOCATION:</b>                                                                                                                                            | Land To The Rear of The Copse Worthing Road<br>Horsham                                                                                                                     |
| <b>DESCRIPTION:</b>                                                                                                                                         | Construction of up to 23 residential dwellings,<br>(including 9 affordable homes), including access,<br>parking, landscaping and other associated<br>infrastructure works. |
| <b>RECOMMENDATION:</b>                                                                                                                                      | More Information                                                                                                                                                           |
| <b>SUMMARY OF COMMENTS &amp; RECOMMENDATION:</b><br>Comments relating to below information:<br>RF Environmental Air Quality Assessment, dated February 2026 |                                                                                                                                                                            |

**MAIN COMMENTS:**

We note that Air source heat pumps (ASHPs) will be provided within each dwelling to reduce emissions from the development. If incorrectly sited ASHPs can however cause issues with noise, we would be grateful therefore if the applicant can provide a plan showing the proposed locations of the ASHPs on each dwelling.

An Assessment of Dust from Demolition and Construction (using the methodology in the IAQM's Guidance on the assessment of dust from demolition and construction) must be submitted upfront as part of the planning application. If the assessment identifies that demolition and construction would result in an unacceptable impact, such as significant emissions affecting sensitive receptors or designated areas, then the scheme may need to be revised to ensure it can be made acceptable. These design or operational changes may not be achievable once planning permission has already been granted, depending on the scale and nature of the required modifications.

For this reason, the assessment must be provided as part of the initial application submission as best informed as it can be at stage and should not be deferred or secured by condition.

The EFT and damage cost calculations appear to be inaccurate. The EFT should generate results for each of the first five years of the site being operational, and these annual figures should then be entered into the Damage Cost Toolkit (Excel spreadsheet available via <https://www.gov.uk/government/publications/assess-the-impact-of-air-quality>).

Using the information provided in the Air Quality Assessment, I carried out these calculations and arrived at a higher total cost. Please could you review your figures using the above methodology and submit a new damage-cost, including a breakdown of your workings as supporting evidence?

For clarity, these are the figures I used for the EFT and Damage Cost toolkit:

- Start year = 2028
- End year = 2032
- Price base year = 2026 (baseline year for the project appraisal)

As mentioned in the Air Quality Assessment, the Sussex Air guidance seeks to prevent duplication of measures that are already required under other regulatory frameworks. Therefore, the proposed mitigation of cycle storage would not be acceptable, as this is required through WSCC: Guidance on Parking at New Developments - as mentioned in the submitted Travel Plan.

Alternative schemes we would support include:

- i. HDC Local Cycling and Walking Infrastructure Plan
- ii. Improvements to existing cycling paths, and including cycle paths that meet up with current paths in the development design.
- iii. Offsite provision of EV charging points to support the EV Charging Network and Delivery Plans for the local area.
- iv. Support the delivery of WSCC Bus Service Improvement Plan
- v. Other measures included in the Air Quality Action Plan and Annual Status Report

An Interim Planning Guidance on the consideration of the Environmental Act Pm2.5 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 PM2.5 and its precursors as far as is reasonably practicable.

1. How has exposure to PM2.5 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 PM2.5 exposure for development users and nearby receptors (houses, hospitals, schools etc.) and to reduce emissions of PM2.5 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 will be recommended as a condition, once we are happy that the above matters have been addressed.

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| <b>NAME:</b>       | Isabelle Carter                    |
| <b>DEPARTMENT:</b> | Environmental Health and Licensing |
| <b>DATE:</b>       | 30/03/2026                         |