



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DC/26/1168
LOCATION:	Land North of Melton Drive Storrington West Sussex
DESCRIPTION:	Outline application, with all matters reserved, for the phased development comprising: Phase 1 construction of the access road (to be delivered through a subsequent Reserved Matters Application pursuant to Outline Permission DC/24/2006); and Phase 2 residential development of up to 56 dwellings with associated landscaping, pedestrian and vehicular access
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: Comments relating to below information: Anderson Acoustics Limited's Planning Stage Air Quality Assessment, dated 18 th November 2025	

MAIN COMMENTS:

The submitted assessment indicates an increase of approximately 303 AADT. In accordance with the IAQM Guidance on Land-Use Planning and Development Control: Planning for Air Quality, a detailed air quality assessment is required where there is a change in Light Duty Vehicle (LDV) flows of more than 100 AADT within or adjacent to an AQMA. Given the site's close proximity to the Storrington AQMA, and the likelihood that development traffic will pass through the AQMA, a detailed assessment, including air quality modelling, is considered necessary. In line with the Interim Air Quality and Emissions Mitigation Guidance for Sussex (2026), applicants are also advised to consult the local planning authority regarding any extant planning permissions to inform cumulative impact assessments.

Further information is requested regarding the proposed construction traffic routes. Where feasible, vehicle routes should be planned to minimise travel through the AQMA, thereby reducing the potential for additional air quality impacts during the construction phase.

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-air-quality-impacts>). Using the information provided in the Air Quality Assessment, I carried out these calculations and arrived at a higher total cost. When completing the damage-cost calculation, the price base year should be 2025, rather than 2022, as this is the year of appraisal. Additionally, the central benefit cost must be used, rather than the low sensitivity. Using the "Road Transport" source in the damage cost is a conservative approach, and whilst acceptable, it would also be appropriate to use "Road Transport Urban Small".

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 = 2027
- End year = 2031
- Price base year = 2025 (baseline year for the project appraisal)

It is not considered acceptable for the development to proceed without site-specific air quality mitigation. The Sussex Air Guidance takes a low-emission strategies' approach to avoid health impacts of cumulative development, by seeking to mitigate or offset emissions from the additional traffic and buildings. An Air Quality Mitigation Statement should therefore be submitted, identifying suitable mitigation measures and providing an itemised cost breakdown for each measure. The total value of the proposed mitigation must be equal to or greater than the calculated emissions damage cost.

The Horsham Air Quality Action Plan has recently been updated and is expected to be published shortly. As Storrington contains the District's only AQMA, many of the proposed measures are specifically targeted at improving air quality within the village. Any financial contributions or mitigation measures should therefore be directed towards initiatives that support delivery of these AQAP objectives and contribute to air quality improvements within Storrington.

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.

NAME:	Isabelle Carter
DEPARTMENT:	Environmental Health and Licensing
DATE:	08/09/2026