



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	NC/26/0021
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:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: Comments relating to below information: Air Quality Assessments Ltd's Air Quality Reg 25 Response J0709/2/F1, dated May 2026	

MAIN COMMENTS:

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 2026, rather than 2025, as this is the year of appraisal. 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 = 2026
- End year = 2030
- Price base year = 2026 (baseline year for the project appraisal)

Having reviewed the submitted information, we agree that continuous dust monitoring is not required in this instance, and that regular visual dust monitoring and identifying and monitoring the intensity of potential dust generating activities will be sufficient.

The embedded mitigation measures set out in Chapter 9 of the Environmental Statement (Vol 2) are considered sufficient. However, given the increasing frequency of extreme weather conditions, including prolonged dry periods, heatwaves and strong winds, the applicant should demonstrate how dust control measures would be adapted during such events.

ANY RECOMMENDED CONDITIONS:

Condition: The dust mitigation measures set out in Chapter 9 (Air Quality and Dust) of the Environmental Statement (Volume 2) shall be implemented and maintained throughout the importation and restoration phases of the development. Regular visual inspections shall be undertaken to identify dust emissions and assess the effectiveness of the mitigation measures. Where dust emissions are observed, or where weather conditions increase the risk of dust generation, appropriate corrective measures shall be implemented without delay.

During periods of prolonged dry weather, high temperatures or strong winds, dust suppression measures shall be enhanced as necessary to prevent off-site dust impacts. A sufficient water supply shall be maintained on site at all times for dust suppression purposes.

Reason: To protect the amenity of the surrounding area and minimise dust emissions during the construction, importation and restoration phases of the development.

NAME:

Isabelle Carter

DEPARTMENT:

Environmental Health and Licensing

DATE:

14/08/2026