



**Horsham
District
Council**

Chris Bartlett
West Sussex County Council
County Hall
Chichester
PO19 1RH

Our ref: NC/26/0023
Your ref: WSCC/028/21/DIS4
Email: planning@horsham.gov.uk
Direct Line:
If Calling Please ask for: Stephanie Bryant
Date: 2nd September 2026

Dear Sir/Madam,

Discharge of condition 10 (Dust Management Plan) and 14 (Air Quality Protection) of Planning Permission WSCC/028/21

Rock Common Quarry The Hollow Washington Pulborough

I refer to the consultation received in this office on 30th July 2026 concerning the above site.

This Authority has the following comments to make:

Attention is drawn to the Sussex Air Quality Partnership release of interim Air Quality and Emissions Mitigation Guidance v.2.0 July 2026 that replaces the 2021 version.

Dust Management Plan (Condition 10)

Meteorological Data

Whilst Shoreham is closer to the site, further justification is required for its use as the representative meteorological station. As the assessment considers source contributions, representative local wind conditions are important. Shoreham's coastal location is influenced by sea breezes which may limit its representativeness of conditions at the site.

PM Monitoring

Please clarify what real-time PM monitoring equipment and methodology will be used during the operational phase of the site. Any automatic particulate monitoring survey should be designed to identify potential elevated PM₁₀ concentrations and be demonstrably fit for purpose in the context of mineral site monitoring. Whilst the desk-based assessment provides useful background information, baseline monitoring should be undertaken at least three months before works commence to establish site-specific conditions and enable assessment of the effectiveness of dust mitigation measures.

Extreme Events

Extreme weather conditions are becoming increasingly frequent and severe, including heatwaves, prolonged dry periods, and drought conditions. These events have the potential to increase dust generation, exacerbate off-site impacts, and reduce the effectiveness of standard dust suppression measures. The DMP should therefore identify contingency measures to be implemented during periods of extreme weather, setting out how dust emissions will be monitored, managed, and controlled under such conditions. Incorporating these scenarios into the DMP will help ensure the continued effectiveness of dust mitigation measures, maintain compliance with relevant requirements, and improve the resilience of site operations to changing climatic conditions.

Technical Note – Air Quality (Condition 14)

Acknowledge that Condition 14 of the decision notice requires a damage cost contribution of at least £14,938, as agreed through the planning permission. However, this figure was calculated in December 2020 based on an AADT of 236 vehicle movements for the first five years of operation (2022-2026) and using damage cost values per tonne of pollutant derived from 2017 guidance.

Given the age of the assessment and the subsequent changes in damage cost valuations, it is considered that the approved figure may no longer accurately reflect the current impacts of the development. The final damage cost calculation is therefore unlikely to represent present-day conditions, and the equivalent value would be expected to be higher if recalculated using current methodology and damage cost factors. Therefore, request damage cost assessment is reviewed and updated using the latest available guidance and valuation data.

Further clarification is required regarding the mitigation measures proposed to address operational emissions. The proposed replacement of diesel dump trucks with fully electric-powered field conveyors appears to be a measure that is already required to address highway safety and local amenity considerations and therefore should not be relied upon as additional air quality mitigation.

Regarding the measures to be put forward in the air quality mitigation plan request the applicant avoids duplication of measures that would normally be required through other regimes. The proposed mitigation measures should also have regard to the Horsham Air Quality Action Plan and Storrington Air Quality Action Plan.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Emma Parkes', with a stylized, flowing script.

Emma Parkes
Head of Development and Building Control