

1 May 2026

PUBLIC

Dear Sir/Madam,

### **Response to comments for Land Northwest of Southwater**

This letter responds to the comments received by Horsham District Council in relation to air quality for the outline planning application for Land northwest of Southwater (reference: DC/26/0366).

We note that the reviewer looked at Appendices 6.1-6.6. Please also see Chapter 6 of the Environmental Statement, which covers the air quality assessment.

### **Damage Cost Calculations**

As per comments received, the damage cost calculations have been updated to use road type “Urban (not London)” in the Defra’s Emissions Factors Toolkit v13.1 (EFT)<sup>1</sup>. Furthermore, in the Damage Cost Appraisal spreadsheet the “Road Transport Urban Small” has been used as outlined below.

The following data were used in the EFT:

- Traffic flow: 5900 AADT
- % HDV: 2.68%
- Speed (kph): 50
- No of hours: 24
- Road type: Urban (not London)
- Years: 2036-2040 (inclusive)

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<sup>1</sup> Department for Environment, Food and Rural Affairs, (2025). Emissions Factors Toolkit. [Online] accessed via: <https://laqm.defra.gov.uk/air-quality/air-quality-assessment/emissions-factors-toolkit/>

The calculated NO<sub>x</sub> and PM<sub>2.5</sub> emissions from the EFT were input into the most recent Defra Air Quality Appraisal: Damage Costs Toolkit<sup>2</sup>. The following details were used in the control panel:

- Start year: 2036
- End year: 2040
- Price base year: 2026
- Number of pollutants: 2 (NO<sub>x</sub> and PM<sub>2.5</sub>)

The input details into the damage cost user interface are outlined in **Table 1** below, where the annual emissions in tonnes/year are from the EFT.

**Table 1 – Input to the Damage Cost Appraisal Toolkit**

| Operational Years | Damage Cost Type           | Annual Emissions (tonnes/year) |                   |
|-------------------|----------------------------|--------------------------------|-------------------|
|                   |                            | NO <sub>x</sub>                | PM <sub>2.5</sub> |
| 2036              | Road Transport Urban Small | 0.966                          | 0.367             |
| 2037              |                            | 0.882                          | 0.366             |
| 2038              |                            | 0.819                          | 0.365             |
| 2039              |                            | 0.772                          | 0.364             |
| 2040              |                            | 0.736                          | 0.363             |

**Table 2** shows the outputs from the Damage Cost Appraisal Toolkit for each pollutant. The total damage cost for the Proposed Development is £194,864 (central present value).

**Table 2 – Output from the Damage Cost Appraisal Toolkit**

| Pollutant                              | Low sensitivity present value | Central present value  | High sensitivity present value |
|----------------------------------------|-------------------------------|------------------------|--------------------------------|
| NO <sub>x</sub> Road Transport Rural   | £6,881                        | £41,650                | £141,021                       |
| PM <sub>2.5</sub> Road Transport Rural | £53,471                       | £153,214               | £481,141                       |
| Total                                  | £60,352                       | <b><u>£194,864</u></b> | £622,161                       |

<sup>2</sup> Defra, (2025). Damage Cost Appraisal Toolkit. [Online] Accessed via: <https://www.gov.uk/government/publications/assess-the-impact-of-air-quality>

## **Air Quality Mitigation**

We note that mitigations to the value of the calculated damage cost will be required to be implemented and this will be conditioned.

## **EIA Scoping Report and monitoring data**

The document “Environmental Statement, Volume II, Appendix 1.1, EIA Scoping Report” is the scoping exercise completed in October 2025 to assess baseline conditions and identify the scope of the assessment. At the time when the scoping report was prepared, the ‘Study Area’ for the air quality assessment had not been finalised, since traffic data were not available. Therefore, the air quality baseline for the scoping report was based on monitoring locations within 2km of the proposed boundary (which were Southwater 1, Horsham 3N, Broadbridge Heath and Horsham 8N). Furthermore, at the time when the scoping report was completed, the latest data available were from 2023. The Southwater 1.1 and Southwater 2 monitoring locations have been monitoring since the beginning of 2024, and therefore were not included in the scoping report.

Please see section 6.4 of Chapter 6 of the Environmental Impact Assessment for the baseline conditions for the air quality assessment. As outlined in this section, there are three diffusion tubes within the Study Area (Southwater 1.1, Southwater 2 and A281\_A24). Horsham 8N and Horsham 12.2 have not been included as these are outside the Study Area for the air quality assessment (shown in Figure 6-1 below). Southwater 1.1 and Southwater 2 were used for model verification, as outlined in Appendix 6-3.

## **Dispersion modelling and figures**

The figures associated with the air quality assessment are included at the end of Chapter 6 in the Environmental Impact Assessment. Figure 6-1 shows the air quality study area, modelled road network, construction dust study area and the location of the local air quality monitoring sites. Modelled human receptors and the modelled road network is displayed in Figure 6-3. Please see both figures attached to this letter for ease.

## **EIA Scoping Report and monitoring data**

We note your comment on the CEMP to be submitted and that you request for non-road mobile machinery shall follow London emission standards.

Yours faithfully

Natalie Espelid  
Principal Air Quality Consultant