



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Development Control
FROM:	Environmental Health and Licensing
REFERENCE:	DC/26/0366
LOCATION:	Land Northwest of Southwater
DESCRIPTION:	Outline planning application, with all matters reserved (except for primary access to the highway) for a phased development comprising: the demolition of existing buildings and the construction of residential dwellings (including affordable housing) (Use Classes C2 and C3); a mixed-use neighbourhood centre (Use Classes E and F); education facilities (Use Class F1(a)); business and employment floorspace (Use Classes B2, B8 and E(g)); redevelopment of existing agricultural buildings including construction of a building for community use (Use Classes E and F2); improvements to public rights of way; sports pitches; gypsy and traveller pitches/plots; public open space; landscaping, and associated infrastructure.
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: Comments relating to below information: Environmental statement volume II, Appendix 6.3: dispersion modelling methodology Environmental statement, Volume II, Appendix 1.1, EIA scoping report Environmental statement volume II, Appendix 6.5: damage cost calculations All produced by WSP and Berkeley Strategic and dated February 2026.	

MAIN COMMENTS:**Noise and other Nuisance:**

The proposed site is near to domestic dwellings, so has potential for nuisance from noise, lighting or work activities to affect existing residents. Consideration should be given to whether this potential for nuisance can be managed by conditions before any permission is given.

Waste:

If approval is given, we would recommend conditions to ensure that the site is not used for the storage of waste and waste materials, or for burning of such.

Air Quality:

I have reviewed the Appendices 6.1-6.6 and I have the below comments:

For future reference it is much easier for all air quality information to be submitted in one Air Quality Assessment report. There is a chance for information to be missed when it is supplied in separate appendices.

The methodology used for the damage cost calculations is correct and all information has been supplied. However, the road type "Rural (not London)" was used. As Southwater has a population of over 10,000, and as this development creates a close link to Horsham town, road type "Urban (not London)" in the EFT and "Road Transport Urban Small" in the Damage Cost Appraisal spreadsheet should be used. Please update the damage cost calculations accordingly.

Air Quality mitigations will need to be submitted up to the value calculated in the damage costs. As this is an outline application, I am happy for these to be conditioned. We will be particularly keen to see mitigations that involve improving the public transport infrastructure to make access to Horsham town easier for residents without using cars. Air Quality mitigations need to go above and beyond what is already required under planning policy.

In the document "Environmental Statement, Volume II, Appendix 1.1, EIA Scoping Report" Appendix 5.2, the diffusion tube data included in your assumptions have been listed. Only one tube from Southwater has been included, but there are two. I am also unsure why tube "Broadbridge Heath 1" has been included as it doesn't represent a route we can expect to be routinely taken from the development site. The tubes I would like to see included are; Southwater 1.1, Southwater 2, Horsham 8N and Horsham 12.2, as this represents a logical route that residents of the development would take. These should also be applied to the modelling performed.

There is no map supplied with the information on dispersion modelling. This makes it very hard to evaluate the methodology used. It would be appreciated if the applicant

could supply either the GIS Shapefile or a map visual showing the location of all receptors and proposed receptors, as well as the roads used in the modelling.

I am happy to see that the supplied documents frequently mention a CEMP to be submitted. I will request this to be attached as a condition. One requirement we would like to see included is that non-road mobile machinery shall follow London emission standards

CONDITIONS:

Pre-Commencement Condition: The development hereby approved shall not commence until a Construction and Environmental Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP shall include details of the following relevant measures:

- i. An introduction consisting of construction phase environmental management plan, definitions and abbreviations and project description and location;
- ii. A description of management responsibilities;
- iii. A description of the construction programme which identifies activities likely to cause high levels of noise or dust;
- iv. Site working hours and a named person for residents to contact;
- v. Detailed Site logistics arrangements;
- vi. Details regarding parking, deliveries, and storage;
- vii. Details regarding dust and noise mitigation measures to be deployed including identification of sensitive receptors and ongoing monitoring;
- viii. Details of the hours of works and other measures to mitigate the impact of construction on the amenity of the area and safety of the highway network; and
- ix. Communication procedures with HDC and local community regarding key construction issues – newsletters, fliers etc.

The construction shall thereafter be carried out in accordance with the details and measures approved in the CEMP for the related phase.

Reason: As this matter is fundamental in order to consider the potential impacts on the amenity of nearby occupiers during construction and in accordance with Policy 33 of the Horsham District Planning Framework (2015).

Pre-Commencement Condition: Prior to the commencement of the development, a detailed mitigation strategy establishing the on-site measures to improve air quality at both the operational and construction phases shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall be written in accordance with the Council's Planning Advice Document: Air Quality & Emissions Reduction Guidance (2021), and shall detail the calculated damage costs that will be spent on practical mitigation measures. The approved detail within the strategy shall thereafter be strictly adhered to unless otherwise agreed to and approved in writing by the Local Planning Authority.

Reason: To mitigate against the impact of the development in accordance with Policy 24 of the Horsham District Planning Framework (2015) and Air quality and emissions mitigation guidance for Sussex (2021).

NAME:	Georgina Hermitage
DEPARTMENT:	Environmental Health and Licensing

DATE:	18/03/2026
--------------	------------