



Horsham
District
Council

HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Land East of Oaklands Henfield Road Cowfold West Sussex
DESCRIPTION:	Outline planning application for a phased development of approximately 40 residential dwellings, vehicular access, car parking, landscaping, open space and other associated works and infrastructure. All matters reserved except for access.
REFERENCE:	DC/26/0913
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal
SUMMARY OF COMMENTS & RECOMMENDATION: Phlorum Limited's Air Quality Assessment, dated May 2026 Phlorum Limited's Odour Assessment (V2), dated May 2026	

MAIN COMMENTS:

Air Quality

We accept the recommendation that an Air Quality Mitigation Plan can be developed and secured at the Reserved Matters stage once the final development details are known.

Once the scheme design has been finalised at the Reserved Matters stage, the EFT calculations and associated air quality damage cost assessment shall be updated to reflect any relevant design changes or trip generation. It is noted that the assessment has applied the "Urban (not London)" EFT category and "Road Transport Urban Small" damage cost values. Whilst these assumptions are accepted, it should be recognised that they represent a conservative approach, given that Cowfold would generally be characterised as rural.

Odour

We are satisfied that Phlorum has provided sufficient evidence to demonstrate that odour from the nearby wastewater treatment works (WWTW) is unlikely to result in statutory nuisance or an unacceptable loss of residential amenity.

It is also noted that the illustrative layout has been informed by the results of the odour modelling and incorporates a separation distance between the proposed dwellings and the WWTW. At the Reserved Matters stage, the final layout should ensure that residential properties are located at least 30 metres from the WWTW boundary, in accordance with the assumptions and conclusions of the odour assessment.

Whilst the assessment concludes that the proposed development would not be significantly affected by odours from the WWTW, provided residential properties are not located within the north-easternmost part of the site, consideration should be given to the provision of additional planting along the north-eastern boundary. Although vegetation should not be relied upon as a primary odour mitigation measure, supplementary planting could provide additional screening benefits and contribute positively to the amenity of future residents, particularly in areas closest to the WWTW.

ANY RECOMMENDED CONDITIONS:

Should the proposed development be approved we would however like to see the provision of air quality mitigation secured by a condition and we therefore recommend the below:

Pre-Commencement Condition: The development hereby approved shall not commence until an Air Quality Mitigation Plan has been submitted 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).

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 is recommended as a condition:

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. During site clearance, preparation and construction the dust and Air Emission Mitigation measures described in Chapter 5 and Appendix A of the Air Quality Assessment report (Phlorum, May 2026) shall be adopted. 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.
- x. Details of traffic construction routing to and from the site 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).

NAME:	Isabelle Carter
DEPARTMENT:	Environmental Health
DATE:	14/08/2026