

ANTLER HOMES PLC

**WEALDEN HOUSE, LEWES ROAD, ASHURST
WOOD, WEST SUSSEX**

EMISSIONS MITIGATION STATEMENT

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ODOUR**

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EMISSIONS MITIGATION STATEMENT

REPORT VERSION CONTROL

Document Reference	Date	Author	Signed
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1. INTRODUCTION

1.0.1 By instruction from Antler Homes plc, Air Dust Odour were instructed to undertake an Emissions Mitigation Statement in support of a proposed residential development at Wealden House, Lewes Road, Ashurst Wood, West Sussex.

1.0.2 It is understood that planning permission has been granted at the Site by Mid Sussex District Council (MSDC) under planning application reference DM/22/2832 with conditions including the following:

“Prior to the commencement of any residential part of the development hereby permitted, a scheme of mitigation measures to improve air quality relating to the development shall be submitted to, and approved in writing by, the Local Planning Authority. The scheme shall be in accordance with, and to a value derived in accordance with, the “Air Quality and Emissions Mitigation Guidance for Sussex” which is current at the time of the reserved matters application. All works which form part of the approved scheme shall be completed before any part of the development is occupied and shall thereafter be maintained in accordance with the approved details.”

1.0.3 The aim is to therefore satisfy the above condition. The purpose of an emission mitigation assessment is to:

- Calculate the additional transport emissions associated with a development;
- Determine the approach level of mitigation required to help avoid, minimise and/or off-set impact on air quality; and
- Enable an evidence based proportionate approach.

1.0.4 Report limitations are outlined in **APPENDIX A**.

1.1 **SITE LOCATION AND PROPOSAL**

1.1.1 The Site is located off the A22 Lewes Road | Ashurst Wood to the southeast of East Grinstead.

1.1.2 There have been prior applications submitted for the Site. For the purposes of this Emissions Mitigation Statement, the scheme relates to both the EDF site and the Life Improvement Centre and comprises 50 residential dwellings split over 15 flats and 35 houses. A total of 105 car parking spaces are proposed to serve the development, along with suitable provision for cycles.

2. POLICY & GUIDANCE

2.1 MID SUSSEX DISTRICT PLAN 2014 – 2031

- 2.1.1 The Mid Sussex District Plan 2014 – 2031¹ was adopted in 2018 replacing the Mid Sussex Local Plan 2014. MSDC policies for managing developments are laid out in the plan, with the following relating to air quality:

“Continue to tackle climate change and reduce the impacts on the environment by encouraging reductions in carbon emissions, waste, pollution, energy and water consumption and promoting the use of renewable and sustainable building materials.”

- 2.1.2 The strategic objective adds:

“Policy DP29 Noise, Air and Light Pollution

The environment, including nationally designated environmental sites, nationally protected landscapes, areas of nature conservation or geological interest, wildlife habitats and the quality of people's life will be protected from unacceptable levels of noise, light and air pollution by only permitting development where: [...]

Air pollution

- It does not cause unacceptable levels of air pollution;*
- Development on land adjacent to an existing use which generates air pollution or odour would not cause any adverse effects on the proposed development or can be mitigated to reduce exposure to poor air quality to recognized acceptable levels;*
- Development proposals (where appropriate) are consistent with Air Quality Management Plans.”*

2.2 GUIDANCE

- 2.2.1 A summary of the publications referred to in undertaking this assessment is provided below.

¹ Mid Sussex District Council (2018). The Mid Sussex Local Plan. Available at <https://www.midsussex.gov.uk/media/3406/mid-sussex-district-plan.pdf> [Accessed 08/10/2025]



Air Quality and Emissions Mitigation Guidance

- 2.2.2 MSDC is a participating member of Sussex-air partnership. As part of the Sussex-air partnership, Sussex local authorities have developed a guidance to developers on how to assess and mitigate the air quality impacts from development and transport related emissions.



3. SCOPE AND METHODOLOGY

3.1 EMISSIONS MITIGATION ASSESSMENT

3.1.1 In accordance with the Sussex-air 2020 guidance, the development is classified as a major development due to there being more than 10 dwellings. Therefore, an emission mitigation assessment has been undertaken with reference to the Sussex-air partnership guidance document. The emission mitigation assessment is undertaken to quantify the monetised damage value associated with transport emissions from the development over a 5-year period.

3.1.2 The approach taken for the emission mitigation assessment for the development is summarised as follows:

- Identify the trips/annum generated by the development;
- Assume an average distance travelled of 10km/trip
- Calculate the emissions for NO_x and PM_{2.5} (tonnes/annum) using the Defra 'Emission Factors Toolkit' with an assumed speed of 50km/hr;
- Calculate damage costs for NO_x and PM_{2.5} using the Defra 'Air Quality Appraisal Damage Cost Toolkit';
- Multiply the calculated emissions health damage values by 5, to quantify emissions over a five-year period; and
- Sum the NO_x and PM_{2.5} costs to provide a total health damage value.



4. DAMAGE COST ASSESSMENT

4.1.1 In accordance with the Sussex-air guidance, the development is classified as a major development. Therefore, an emissions mitigation assessment has been undertaken to provide a valuation of additional emissions related to traffic from the development scheme. The following tools were used for the damage cost calculation:

- Defra ‘Emission Factor Toolkit (v 13.1)’²
- Defra ‘Air quality appraisal damage cost toolkit’³

4.1.2 It should be noted that the Transport Statement does state that the approved development will bring about a reduction in the number of trips the Site will generate over its existing use stating:

“Across a typical 12-hour weekday the [...] development could generate 364 less two-way vehicle trips than the existing site use.”

Therefore, the developments air quality impacts will be lower than the existing consented impacts.

4.1.3 The assessment assumes the Site currently generates no trips.

4.1.4 **Table 1** presents the input values used in the assessment.

Table 1: Damage Cost Assessment Inputs	
Data	Value
Daily Vehicle Movements Produced by the Development ^(a)	391
Heavy Duty Vehicle (HDV) Proportion (%)	0
Average Speed (km/hr)	50
Average Trip Length (km)	10
NO _x Output (kg/year)	208.5
PM _{2.5} Output (kg/year)	24.8
NO _x Output (tonnes/year)	0.208
PM _{2.5} Output (tonnes/year)	0.024
NO _x Damage Costs (£/tonne)	£9,720 (Central)
PM _{2.5} Damage Costs (£/tonne)	£10,498 (Central)

² <https://laqm.defra.gov.uk/air-quality/air-quality-assessment/emissions-factors-toolkit/>

³ <https://www.gov.uk/government/publications/assess-the-impact-of-air-quality>



Table 1: Damage Cost Assessment Inputs	
Data	Value
(a) Based on Daily Trip Generation from Transport Statement	
(b) Calculated based on a conservative development opening year of 2027	

4.1.5 The calculation is shown in **Table 2**.

Table 2: Damage Cost Assessment Calculation	
Data	Value
Annual Cost of NO _x Emissions (£/2027)	£2,577
Annual Cost of PM _{2.5} (£/2027)	£2,223
Total Annual Exposure Cost Value (£)	£4,800
Total Five Year Exposure Value (£) ^(a)	£24,000
(a) For a conservative assessment, no future emission reduction has been applied for the future year exposure values	

4.1.6 As shown in **Table 2** the total damage cost associated with the development is £24,000



5. MITIGATION

5.1.1 A number of mitigation measures are included in the development. The anticipated costs associated with each has been provided by Antler Homes. These are summarised in **Table 3**.

Table 3: Mitigation Measures and Associated Costs		
Mitigation Measure	Cost (£)	Comment
Installation of Electric Vehicle (EV) charging points	£42,500	To ensure the use of sustainable transport modes to and from the site. Based on 50x EV Chargers at 1per plot - £850 each
Installation of Air Source Heat Pumps (ASHPs)	£140,000	To avoid any direct atmospheric emissions that would be generated by gas boilers. 35 ASHPs at £4,000 each (houses only)
Provision of Solar Pannels	£67,500	Contribute to renewable energy generation projects. 30 x pv panels (assuming 2nr per flat to meet SAP requirements). 3,250/plot
Tree Planting	£18,000	To increase deposition of airborne pollutants, reducing atmospheric concentrations in the vicinity of the site.

5.1.2 The total value of mitigation presented in **Table 3** is £268,000. This significantly exceeds the calculated damage cost value of £24,000. As such, the strategies are considered appropriate for the development.



6. CONCLUSION

- 6.1.1 Air Dust Odour was instructed by Antler Homes plc to produce an Emissions Mitigation Statement in order to address a planning condition for the proposed residential development at Wealden House, Lewes Road, Ashurst Wood, West Sussex
- 6.1.2 A damage cost calculation was undertaken to identify the monetary value of predicted emissions from the proposals over a five-year period. A number of mitigation measures to reduce the air quality impacts were then identified and the associated financial obligations compared with the calculated exposure cost. This indicated that the amount attributable to emission control measures was higher than the relevant exposure value. As such, the strategies are considered appropriate for the development.

APPENDIX A

This report is presented to Antler Homes plc. It is not to be relied upon or used by any other person(s) or client in relation to any other matters not specifically covered by the scope of this report.

Air Dust Odour is obliged to exercise reasonable skill, care and diligence in the performance of the services provided to Antler Homes plc. Air Dust Odour shall not be liable except where it has failed to exercise reasonable care, diligence and skill with this report being read and construed accordingly.

The conclusions and recommendations within this report are based upon information provided by others and upon the assumption that all relevant information which has been provided by these parties is accurate. Information obtained and retrieved by Air Dust Odour has not been independently verified by Air Dust Odour unless otherwise stated, and should be treated as such.

DISCLAIMER: This report was prepared by Air Dust Odour and contains its best judgment in light of the information available at the time of its preparation. Any use by a third party or any reliance on, or decisions based on it are the responsibility of such parties. Air Dust Odour accept no responsibility whatsoever for any damages suffered by any third party as a result of decisions made or actions based on the contents of this report.