

Dear Sir/Madam,

A consultee has commented on a Planning Application. A summary of the comments is provided below.

Comments were submitted at 16/12/2025 6:25 PM from Mr Nadeem Shad ([nadeem.shad@adur-worthing.gov.uk](mailto:nadeem.shad@adur-worthing.gov.uk)) on behalf of Environmental Protection, Environmental Health & Licensing.

### Application Summary

Reference:	AWDM/1329/25
Address:	Car Park Adjacent Sandell House Railway Approach Worthing West Sussex
Proposal:	Erection of a five to seven storey building with 29 self contained residential units (Use Class C3) including undercroft parking and cycle store linked to listed building
Case Officer:	Louise Prew

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### Comments Details

I refer to the application with particular reference to air quality.

An Air Quality Assessment has been completed by Cass Allen Consultants dated 22 July 2025 (ref. RP01-25248-R0). Paragraph 8.6 refers to the 'residual effect of the development's operational phase vehicle trip generation' and concludes that as the parking provision is less than the previous use the number of daily trips will decrease. I have two issues with this.

1. We take the view that it is the emissions from the proposed development in their entirety that are to be included in the damage cost calculations, irrespective of previous use. So the use of 'residual' traffic numbers is not accepted. This view has been endorsed by Defra.
2. There is no reference to data from a transport assessment.

Comments:

The Sussex Guidance requires developers to provide an emissions mitigation damage cost calculation and for this to be used on appropriate mitigation measures. This is missing from this report. Defra confirm that the application of the damage cost approach is a valuable tool to see costs to society to based on emissions, which are better placed to be monetised rather than concentrations which vary with dispersal conditions, etc and were (and still are) totally misaligned with the health effects. Therefore as referenced above, total emissions are to be taken into account. Note that any mitigation subsequently proposed must be that not already required by other standards such as building regulations or parking standards.

Furthermore there is also no reference to any cumulative impacts, this must be considered.