

# View Comment

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**Comment ID** /2696

**Respondent** [Campaign to Protect Rural Engl...](#)

**Response Date** 26 Mar 2020

**Current Status** Awaiting Processing

**Response Type** OBSERVATION

**What is the nature of this comment?**

Observation

**Summary** CPRE Sussex recommends that Policy 26 identify target emissions, state the levels to which they must be reduced, and specify the measures that need to be taken in order to reduce them.

**Comment** 1. CPRE Sussex recommends that Policy 26 identify target emissions, state the levels to which they must be reduced, and specify the measures that need to be taken in order to reduce them. However, what these 'emissions' are is not specified, but it is reasonable to suppose that they are NO<sub>2</sub> Nitrogen dioxide, NO<sub>x</sub> Nitrogen oxides, and PM<sub>10</sub>, and PM<sub>2.5</sub>: Airborne particulate matter.

2. In Horsham District, however, air is monitored for PM<sub>2.5</sub> at one site only – Park Way, Horsham, and nowhere else. This is cause for concern, because the Horsham District Council/Sussex Air Quality Partnership '2019 Annual Status Report (ASR) for Horsham District Council', page 39, advises that "*local authorities are expected to work towards reducing emissions and/or concentrations of PM<sub>2.5</sub>. There is clear evidence that particulate matter( PM<sub>2.5</sub>) has a significant impact on human health, including premature mortality, allergic reactions, and cardiovascular diseases.*" And "*The major sources of primary PM<sub>2.5</sub> are industrial combustion, road transport, off-road transport, residential sources and small-scale waste burning. Road transport sources of PM<sub>2.5</sub> nclude mainly exhaust emissions from diesel vehicles, together with non-exhaust emissions from tyre wear, brake wear and road surface abrasion. Chemically, a large proportion of the total mass of PM<sub>2.5</sub> consists of*

*nitrates, sulphates and organic and elemental/black carbon. .... There is evidence of adverse health effects of black carbon particles linked with cardiovascular conditions and premature mortality”.*

3. Air should therefore to be monitored for PM2.5 , as well as NO2 and NOx, across the district ,to ensure that proven-effective interventions can and are taken to reduce and meet the legal limit, or better still the WHO guideline for PM 2.5, as well as NO2 and NOx emissions.

4. Policy 26 should therefore identify target emissions – and state the levels to which they must be reduced, and specify the measures that must be taken to reduce them.

**Proposed Change** CPRE Sussex recommends that Policy 26 identify target emissions, state the levels to which they must be reduced, and specify the measures that need to be taken in order to reduce them.

**Attachments**