

London Plan Examination in Public – Written Statement

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Air Quality and Water Infrastructure

M74. Would the policies for air quality and water infrastructure assist in creating a healthy city in accordance with Policy GG3 and provide an effective strategic context for the preparation of local plans and neighbourhood plans? Are the individual policies and detailed criteria justified and necessary and would they provide an effective basis for development management? In particular:

- a) Are the requirements in Policy SI1 clear and will they be effective in improving air quality whilst delivering the homes Londoners need in accordance with Policy GG4?
- b) Will Policy SI5 ensure adequate provision for water infrastructure and encourage a sustainable use of resources? Is the requirement to use the optional requirement of the Building Regulations justified?

Key points:

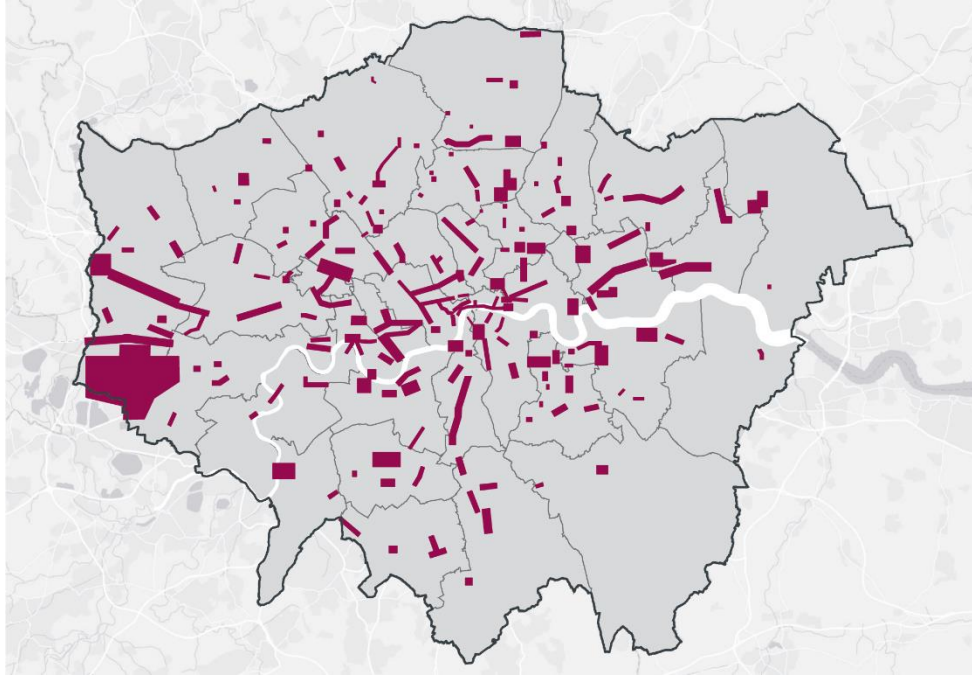
- SI1 should specify that all areas of London need to meet nitrogen dioxide (NO₂) limits and World Health Organisation (WHO) guidelines for particulate matter (PM_{2.5}) in the shortest possible time.
- SI1 should specify that an Air Quality Positive requirement be applied all developments in Air Quality Focus Areas (AQFAs)
- All new development should require the maximum on-site solar PV/thermal, air/ground source heat pump capacity (or other appropriate low or zero emission technologies) to prevent new sources of local pollution.

Evidence and further information: [H2]

Figure 9.1, reproduced below, shows quite clearly that many of London's Air Quality Focus Areas (AQFAs) are outside of the Mayor's proposed new inner London Ultra Low Emission Zone (ULEZ) for all vehicles, which is set to start in 2021.

AQFAs are areas that not only exceed EU annual mean limit value for nitrogen dioxide (NO₂), but are also locations with high human exposure. These are often associated with London's most deprived neighbourhoods, as described in paragraph 9.1.1, and people who are most vulnerable to the impacts of filthy air.

Figure 9.1 – London’s Air Quality Focus Areas



Policy SI1 A should be amended to make clear that the goal of the policy is that no-one in London misses out on clean air, and to ensure the policy matches both our legal obligations and the best medical evidence on particulate matter pollution.

Proposed amendment to policy SI1 A (changes highlighted in bold)

London’s air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced **as quickly as possible. All areas of London need to meet nitrogen dioxide (NO₂) limits and World Health Organisation guidelines for particulate matter (PM_{2.5}) in the shortest possible time.**

I am pleased to see the Air Quality Positive requirement being applied to central London. This is described in paragraph 9.1.3 and reduces air pollution through measures such as low or zero emission heating and better public transport.

However, policy SI1 A (3) should be amended to specify that all development proposals in AQFAs should also require this.

To cut emissions from domestic gas boilers, SI1 A needs an additional numbered section specifying that zero-emission heating technologies are preferred. This should also include gas-free development where electricity is the only power source.

Further proposed amendments to policy SI1 (changes highlighted in bold)

A (2) Development proposals should use design solutions to prevent ~~or minimise~~ increased exposure

A (3) should be amended to specify **that all development proposals in Air Quality Focus Areas should require an Air Quality Positive approach.**