

Policy 7.14 Improving air quality

Our comments relate mainly to Policy 7.14, question a)

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- Should the focus of the policy be on preventing air pollution rather than simply avoiding it getting worse, and are the proposed measures a sufficient and appropriate spatial planning response to the Mayor's Air Quality Strategy, to achieve the former rather than the latter (and meeting legally binding EC limits)?

1. Argument and Evidence

1.1 London has a major air quality problem. In a table showing attractiveness to do business in European cities, London came 27th on freedom from pollution in 2008 (Entec's Integrated Impact Assessment of October 2009 on the draft replacement London Plan – Ref CD03) A recent article in June 2010 (Guardian 25.06.10 – Ref RD 127) suggested that London has in the first half of this year already exceeded some of its annual allowable air quality limits.

1.2 The London Sustainable Development Commission (which independently advises the Mayor on sustainability) shares the Mayor's wish to zealously protect the health and well being of Londoners (Foreword to the Air Quality Strategy – Ref LD50). The Commission wants London's air quality to be second to none.

1.3 The Commission believes that the policy focus should be on prevention in the first instance. The pressures of economic and population growth with the consequent increase in the demand for industrial sites, housing and transport will make the poor pollution and associated health problems worse unless radical action is taken. Sticking plaster solutions are unlikely to be adequate or cost effective in the long term.

1.4 The Air Quality Strategy itself, though welcome in many respects, does not go far enough. The measures should aim to reduce pollution at source and not just tackle the effects. To illustrate:

- On particulates, the planned actions may just get to EU limits but there is a real risk that they will not and the strategy itself acknowledges we ought to be going further. The WHO Air Quality Guidelines (WHO Guidelines, 2005 – Ref RD270) have tougher levels. The solutions to tackling the issues are, in some cases such as washing down roads and random road closures on bad days, examples of tackling the symptoms not a cure.
- On NO_x the plan falls well short of what is needed. Recent research shows that NO_x levels in London have been largely static for 6-7 years and have not decreased in line with previous expectations. However, modelling suggests that by 2015 NO₂ limit values will be exceeded across Greater London (Mayor's Transport Strategy – Ref LD119). Concentrations of NO₂ can be over twice the EU limit value for this pollutant and substantial action is required to reduce concentrations of this pollutant. This will require measures that actively reduce traffic levels rather than avoiding future growth. The

evidence of recent studies is that emission controls on vehicles are not going to be enough to achieve the EU Limits values.

- In spatial terms, the Commission notes that the London Assembly's Environment Committee unanimously recommended a central clean air zone ('Every Breath you take', May 2009 – Ref RD 126). This may be the most effective way of tackling the problem provided it is accompanied by stringent measure to tackle air quality problems at source including reductions in the use of motor vehicles

1.5 Against this background, the Planning criteria listed under Policy 7.14 Bc do not appear to go far enough. "Air quality neutral" suggests a lack of ambition to improve the air quality situation. And in fact with the forecast growth in demand (from e.g. population, economic activity, and transport) the cumulative effect of many such decisions will do nothing to reduce the scale of the problem.

1.6 Similarly paragraph 7.42 refers to offsetting the negative impacts. We would like to see that on-site measures should more than compensate for the impacts. Monitoring and public awareness raising may only have an indirect effect on the problem.

1.7 – Specifically, with reference to the proposed Mayor's Air Quality Strategy 'Clearing the Air', we offer the following recommendations:

- The Mayor should come forward with schemes that actively promote parking based on CO2 and air quality, across all London boroughs,
- The Mayor should promote the deployment of air quality measurement equipment across all London boroughs, specifically that which enables levels of pollutants and air quality to be visibly displayed to the public in high risk areas (comparable to speed limit warnings),
- To drive forward improvements in air quality, the Mayor should identify an individual who has leadership on this issue within their remit, to champion initiatives and be held accountable for progress.

2. Conclusions on Policy

2.1 Our view is that the plan should go further to support the Air quality Strategy objectives by actively encouraging measures that prevent the problem of air pollution getting worse including reductions in the sources of traffic related emissions.

This suggests that that under Policy 7.14 of the Plan, the Planning criteria Ba to Bc should be reviewed. Criterion Bc for example refers to "air quality neutral" whereas under LDF preparation paragraph Ca refers helpfully to the fact that Boroughs and others...should have policies that "seek reductions in levels of pollutants ..."