



LSx's CONTRIBUTION TO CONSULTATION ON THE FURTHER ALTERATIONS TO THE LONDON PLAN (FALP), APRIL 2014

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1 Overview

This paper outlines LSx's submission to the Further Alterations to the London Plan (FALP) consultation. **Our evidence is specifically designed to consider how new developments need to consider air quality.**

1.1 Background

On 15 January 2014, the Mayor published Draft Further Alterations to the London Plan (FALP) for a twelve week period of public consultation. The aims of the consultation include:

- address key housing and employment issues, emerging from an analysis of census data released since the publication of the London Plan in July 2011;
- develop the concept of the London Plan as the 'London expression of the National Planning Policy Framework';
- provide a robust, short to medium term planning framework to provide a clear 'direction of travel' for the longer term, recognising that this may well have to be reviewed.

The deadline for responses is **10th April 2014**.

Our response is informed by LSx's direct experience of delivering our **behaviour change programme** of work, aimed partly at improving health across London. Our programme includes the following projects:

- Cleaner Air 4 Communities / Schools
- Well London
- Other projects tackling wider issues such as health and well-being

Involvement in these has given us insight into public attitudes and behaviours towards public services, a knowledge of the relative effectiveness of different elements of campaigns and projects, and, crucially, an understanding of how best to effect lasting change in behaviours.

2 Air Quality and the Further Alterations of the London Plan.

2.1 Introduction

This paper provides an outline of issues raised by the Draft FALP and suggests some questions that might be appropriate for you to pursue in relation to Air Quality.

It is based primarily on **Chapters 6 &7 of the Draft FALP** of January 2014.

The main aim of the FALP is to provide an interim framework for dealing with the major increase in housing requirements, as clarified in Chapter 1. There is a clear indication that the London Plan is required to consider the need for greater intensification, and also greater provision for the elderly and students, and to help release housing for families.

Since this increase in density is likely to have an impact on sustainable communities in relation to infrastructure demands and building design, we need to ensure that all new construction is developed with environmental issues in mind. **This briefing is specifically designed to consider how new developments need to consider air quality.**

2.1.1 The Challenge

- 4,000 Londoners a year die prematurely from causes related to air pollution.
- Air pollution contributes to many health problems including asthma, heart disease and lung disease and lung cancer.
- Air pollution affects those already at their most vulnerable, such as children and the elderly
- LSx's citizen science programme found evidence that indicates that street by street air quality may dramatically exceed the European limits on air quality in certain pockets was significantly higher than official figures.

We found evidence of:

- Particulate Matter (PM10) concentrations **four times the European Union limit** ;
- Nitrogen Dioxide (NO2) concentrations more than **double the legal limit** .

London has the highest levels of NO2 of any capital city in Europe and the UK has the highest proportion of zones breaching legal limits. Information obtained from Mayor Johnson shows that exhaust emissions from passenger cars (including private hire vehicles) of NO2 and dangerous airborne particles (PM2.5) are expected to rise from 39% and 49% of transport exhaust emissions respectively in 2010 to a staggering 47% and 54% respectively in 2015

The World Health Organisation (WHO) says both short- and long-term studies have found adverse health effects at concentrations that were at or below the current EU limit values. Leading scientists say there is evidence for a long-term effect of NO2 on natural mortality as high as that of PM2.5.

2.1.1.1 Health effects

- Air pollution causes and exacerbates many cardiovascular and respiratory diseases.
- The likelihood of getting lung cancer rises as air pollution increases.
- Air pollution has the greatest effect on young, developing lungs and older people.

2.1.1.2 Causes

- 85% of air pollution in London is produced by road transport, particularly large diesel vehicles.
- Although a shift from petrol to diesel vehicles has helped control CO₂ emissions it has also resulted in Particulate Matter increases in some areas.

2.2 Relevant developments since the last publication of the London Plan

1. The publication of the supplementary planning guidance on sustainable design and construction – includes the provision of air quality neutral, - this refers to the NPPF which states that planning policies should sustain with and contribute towards compliance.
2. WHO guidance. Whilst many parts of London's back streets fall within the current European targets, **the WHO recommends that these targets would need to be reduced in order to protect healthy lifestyles.¹ Indeed there may be no safe level for PM10_{2.5}²** The WHO findings indicate that many people cannot control their air quality through their own behaviour. **Local, regional and national governments need to collaborate in order to improve our air quality.³**
3. [The European Commission has sent the UK a 'Letter of formal notice' for breaching nitrogen dioxide \(NO2\) limit values in 16 of 43 zones.](#) The UK is the first of the EU's 28 Member States to receive enforcement action on NO₂. Commission has also responded to a request from Clean Air in London for clarification on certain provisions of Directive 2008/50/EC on ambient air quality and cleaner air for Europe.
 - a. Mayor Johnson estimates UK faces fines of £300m per annum for London alone if compliance is not achieved.

In order to address the letter from the European Commission, whilst providing many more homes and higher density, air quality would have to be taken into account in greater detail than in previous iterations. This consideration will have to be extended to all planning decisions through Local Development Frameworks.

¹ <http://www.who.int/mediacentre/factsheets/fs313/en/>

² <http://www.nhs.uk/news/2013/12December/Pages/Safe-levels-of-air-pollution-could-still-be-harmful.aspx>

³ <http://www.who.int/mediacentre/factsheets/fs313/en/>

Given the importance of air quality and the requirements set out by the European Commission we would consider that elements of the FALP should be strengthened to include the importance of air quality.

2.3 Changes that now include consideration for air quality:

2.3.1 Policy 8.2 - Planning Obligations

Planning decisions – *'importance should also be given to tackling climate change and air quality and social infrastructure.'*

2.3.1.1 Recommendation 1

This is an important inclusion in the FALP that we would strongly support. We would equally support the inclusion of considerations concerning air quality in the guidance for boroughs when developing their 106 agreements.

Tackling air quality implies reduction to pollution, which is something that is now deemed necessary if we are to address the issues as set out in the European Commission's letter.

2.3.2 Policy 8.3 – Community Infrastructure Levy

The mayor has pledged to work with government and other stakeholders to ensure the effective development and implementation of the CIL. Funds will be targeted towards funding Crossrail. – The mayor will work with boroughs to prioritise infrastructure using the Local Development Frameworks identification process, particularly to support development of opportunity and intensification areas.

2.3.2.1 Recommendation 2

LSx would support this. However, the wording should make it clearer that boroughs must ensure that air quality is included as a priority in Local Development Frameworks, in order for the policy to be effective.

2.4 Changes that would be required to be made in order to address recent changes & policy 8.2

2.4.1 Policy 7.14

Given that the Mayor has now indicated in policy 8.2 that importance should be given to tackling air quality in major planning decisions, there appears to be a tension in the plan in that **air quality neutral is not emphasised in the policy 7.14, nor does it suggest that air quality should be improved.** Again this would be crucial if we are to address the requirements set out in policy 8.2 and the issues as set out in the European Commission's letter.

Our work with local authorities indicates that unless they are required to adopt air quality neutral or reduce the impact of pollution or tackle air quality from policies in the London Plan, they are extremely unlikely to do so.

2.4.1.1 Recommendation 3

Given that the recently published SPG will not be mandatory guidance to the boroughs, policy 7.14 should specifically refer to the Air Quality Neutral guidance

Whilst Policy 7.14 B c refers to no further deterioration, **and the requirement to tackle air quality or reduce pollution (similar to policy 8.2) ,** LDFs should be required to do the same, and the wording in the text should reflect this.

About London Sustainability Exchange (LSx)

London Sustainability Exchange is an independent charity that works to accelerate the transition to a sustainable London, by providing organisations and networks of individuals with the motivation, knowledge and connections they need to put sustainability into practice.

Our aim is to:

- Increase sustainability literacy in London
- Develop and influence policy and practice regarding London
- Learn from and broadcast good practice from everywhere

Table of links to our evidence sources

Date	Title	Web link	Type of activity	Theme
June 2010	<i>LSx Environmental Justice Report and toolkit</i>	Link to LSx Environmental Justice Toolkit	Review and case studies on environmental Justice including air quality and noise mapping	Sustainable Communities
August 2012	LSx's role in Well London A Self Evaluation	http://www.lsx.org.uk/docs/page/3396/Executive%20Summary%20-%20FINAL.pdf		
November 2013	<i>Annual air quality conference</i>	http://www.lsx.org.uk/news/events.aspx?id=3605	Conference	Air quality

Cleaner Air 4 Schools evidence

School	Link to executive summary of report
Cleaner Air 4 Schools Toolkit	https://www.london.gov.uk/sites/default/files/CA4S%20Toolkit[1].pdf
Prior Western Primary School, Islington	http://www.lsx.org.uk/docs/page/3584/Prior%20Weston%20Exec%20Summary%2009%2002.pdf
Stamford Hill Primary School,	http://www.lsx.org.uk/docs/page/3584/PACT%20St

Hackney	amford%20Hill%20Summary%202%2010%202013.pdf
St. Johns Upper Holloway Primary School, Islington	http://www.lsx.org.uk/docs/page/3584/St%20John%202013%20Exec%20Summary%202013%200710.pdf
Tiverton Primary School, Hackney	http://www.lsx.org.uk/docs/page/3584/Bubble%20Day%20report%20exec%20summary%200210.pdf
Canonbury Primary School, Islington	http://www.lsx.org.uk/whatwedo/CA4S_page3584.aspx
St Edwards RC Primary School St Vincent's Primary School Christchurch Bentinck Primary School All Westminster	http://www.lsx.org.uk/whatwedo/CA4S_page3584.aspx