

ORGANISATION	LONDON FIRST
ID	1588
MATTER	M74 SUSTAINABLE INFRASTRUCTURE – 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?

1. London First is naturally supportive of measures that will improve the capital's air quality. For example, London First supports the Mayor's plans for the Ultra Low Emission Zone and would like to see an expansion of more sophisticated congestion charging.
2. However, in London First's March 2018 representations on the December 2017 version of the draft Plan, there was concern expressed regarding the ambiguity around the term 'Air Quality Positive', including how it could be demonstrated or quantified as part of the planning application process and the potential impacts on deliverability and development viability. In London First's view, the draft Plan had failed to properly define Air Quality Positive, other than suggesting some very high-level scheme interventions in the explanatory text at paragraph 9.1.3.
3. London First considers that the GLA's proposed Minor Suggested Changes (August 2018) have not provided the clarification that the industry was seeking. There remains no adequate technical definition in either the explanatory text for Policy SI1 or the draft Plan's Glossary. London First is advised that air quality specialists in the development industry are finding it difficult to fully understand what the term means on a scheme-by-scheme basis.

4. Indeed, London First's concern regarding the draft Plan's approach to S1A has been strengthened by the proposed Minor Suggested Changes, which delete the reference to an area-wide approach to achieving Air Quality Positive in "*large-scale redevelopment areas, such as Opportunity Areas*". Instead, S1A (3) and (3A) make it clear that air quality is now assessed on a scheme-specific basis, namely that all major development proposals must be at least air quality neutral and that large-scale development proposals subject to an Environmental Impact Assessment should propose methods of achieving Air Quality Positive. This also raises an inconsistency with the explanatory text at paragraph 9.1.3, which has not been updated to reflect the changes to the policy wording.
5. London First considers that any major scheme proposal should be encouraged to be both as clean as practicable and financially feasible for their particular circumstances; however, it must be acknowledged that external factors outside a site's boundary have a significant influence on air quality conditions. Accordingly, it is an issue that is more effectively dealt with on an area-wide basis.
6. In conclusion, London First supports the intent to improve air quality conditions in the capital to achieve the objectives of GG3, but remains concerned that Policy SI1 has not been properly thought through or evidenced, and therefore it does not provide an effective strategic context for the preparation of local plans and neighbourhood plans.

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?

1. London First supports this policy.