

Letter of Confirmation: Adopted London Plan, Air Quality Assessment, Pope's Road, Brixton

Air Quality Consultants Ltd (AQC) prepared the Air Quality Assessment (dated March 2020) and subsequently a Statement of Conformity (dated June 2020) for the above planning application (ref. 20/01347/FUL). Since the submission of the Air Quality Assessment the London Plan¹ has been adopted. AQC have reviewed the Air Quality Assessment and Statement of Conformity against the adopted London Plan to determine whether the above changes will materially alter the conclusions of the Air Quality Assessment.

The London Plan sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The key policy relating to air quality is Policy S11 on *Improving air quality*, Part B1 of which sets out three key requirements for developments:

“Development proposals should not:

- a) lead to further deterioration of existing poor air quality*
- b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits*
- c) create unacceptable risk of high levels of exposure to poor air quality”.*

The Policy then details how developments should meet these requirements, stating:

“In order to meet the requirements in Part 1, as a minimum:

- a) development proposals must be at least Air Quality Neutral*
- b) development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local*

¹ GLA (2021) The London Plan: The Spatial Development Strategy for London

problems of air quality in preference to post-design or retro-fitted mitigation measures

- c) *major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1*
- d) *development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure”.*

The Air Quality Assessment shows the Proposed Development does not lead to further deterioration of poor air quality. As detailed in Chapter 6: Operational Phase Impact Assessment of the Air Quality Assessment, with the Proposed Development predicted annual mean nitrogen dioxide is predicted to increase from 0% to 1%, and the impacts described as negligible. The increases in annual mean concentrations of PM₁₀ and PM_{2.5} at relevant locations, relative to the objectives, will be 0% (when rounded) and the impacts negligible. The Proposed Development does not lead to any new areas that exceed the air quality limit or delays compliance. The Proposed Development does not introduce unacceptable levels of exposure to poor air quality. Consequently the overall operational air quality effects of the Development are judged to be ‘not significant’.

With regards to Air Quality Neutral, as detailed in Chapter 7: Air Quality Neutral of the Air Quality Assessment the building and transport related emissions associated with the Proposed Development are both below the relevant benchmarks. The Proposed Development therefore complies with the requirement that all new developments in London should be at least air quality neutral.

Part C of the Policy introduces the concept of Air Quality Positive for large-scale development, stating:

“Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved

across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating:

- 1) how proposals have considered ways to maximise benefits to local air quality, and*
- 2) what measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this.”*

The proposed development is not large-scale development, thus an Air Quality Positive statement is not required.

Regarding construction and demolition impacts, Part D of Policy SI1 of the London Plan states:

“In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance”.

Following best practice guidance, Appendix A9 of the Air Quality Assessment sets out the mitigation measures to be employed during the construction and demolition phase. With these measures in place, it is expected that any residual effects will be ‘not significant’.

Part E of Policy SI1 states the following regarding mitigation and offsetting of emissions:

“Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development”.

As above the impact of the Proposed Development is ‘not significant’ and as such no further measures are required to ensure that emissions are reduced.

Given the above, in AQC's professional opinion, the adopted London Plan will not materially alter the conclusions of the Air Quality Assessment (March 2020) and the Statement of Conformity (June 2020), both of which remain applicable and valid.