

Local Plan Independent Examination

OPDC Response to Matter and Issue 2(e)

Matter 2(e): Whether the Plan has been positively prepared in terms of the effects of the Plan’s proposals and policies on Air Quality (derived from the eighteenth Key Issue of table 5 of Key document 5 identified at Regulation 19(1) stage and representations 2/T5/19-20 and 2/T6/6-7 from LBH&F)

Although I am content with the officers’ response to this Matter set out in Appendices E and J to Key document 5, a Hearing session will be required if LBH&F exercises its right to be heard.

OPDC response:

- 1.1. OPDC considers the Plan has been positively prepared in terms of the effects of the Plan’s proposals and policies on air quality. OPDC recognises that air quality has a significant role to play in health and wellbeing. Policy EU4 sets out the over-arching policy requirements in respect of air quality with location-specific air quality requirements set out in the Place Policies where applicable. Policy EU4 requires development to appropriately minimise air pollution and make a positive contribution to overall improvement in air quality. These policies are supported by OPDC’s Air Quality Study.
- 1.2. The Regulation 19(2) version of the Local Plan was amended following consultation responses on the Regulation 19(1) draft, including but not limited to the response received from the London Borough of Hammersmith and Fulham. These resulted in policy EU4 being significantly strengthened in relation to the requirement for Air Quality Assessments and in requiring development proposals to comply with the relevant borough's Air Quality Action Plans, thereby requiring agreement with the relevant borough.
- 1.3. Following comments provided by the London Borough of Hammersmith and Fulham on the Regulation 19(2) version of the Local Plan regarding World Health Organisation (WHO) references in the London Plan, OPDC has proposed an amendment to align with the London Plan supporting text suggested change to work to achieve WHO targets. This is set out in the list of Submission Minor Modifications (reference MINOR/2/EU4/3). This amendment comprises the following:

“OPDC will adopt EU established health-based standards and objectives for a number of air quality indicators (NOX, PM10 and PM2.5) until these are superseded by UK standards. In addition, the London Environment Strategy has committed to establishing new targets for air quality with the aim of meeting World Health Organization guidelines by 2030.”
- 1.4. OPDC recognises the aspirations and benefits to delivering zero tailpipe emissions, including from buses and taxis. However, the policies of the Local Plan are not able to control tailpipe emissions from these vehicles. The Mayor’s London Environment Strategy

(LES) sets out an aim to improve London's air quality by transitioning to a zero emission London by 2030. The LES states that the Mayor will use statutory powers to deliver this. This includes introducing the Ultra Low Emission Zone and transforming the bus and taxi fleets to be zero emission (page 40 of the LES). In helping to deliver this LES aim, Table 6.1 which supports policy EU4, sets out an action in the first bullet point to encourage transport by low and zero emission modes of transport.

- 1.5. In relation to Energy from Waste facilities and air quality, OPDC's Utilities Study (document SD25) has assessed options and sets out further detail on the approach and assessment of energy sources for the strategic district heating network. The heat source for an area wide network is yet to be determined. Energy from waste has the potential to be a viable low carbon heat source but there are other potential secondary heat sources that have been investigated, including ground source heat pumps and heat recovery from the Grand Union Canal. The policy does not identify potential waste streams which is considered to provide appropriate flexibility to be in general conformity with the London Plan and to be consistent with the latest approach set out in the London Environment Strategy regarding the use of municipal waste for Energy from Waste facilities. A range of policies within the Local Plan and London Plan will be implemented to ensure that new development, including facilities for a decentralised energy network, would not cause unacceptable harm to the amenity of existing uses. The Local Plan policies include SP9, D6, EU4, EU5, EU6, P2 and P8.