

Boris Johnson, Mayor of London
Greater London Authority
City Hall
The Queen's Walk
London SE1 2AA

By email: mayor@london.gov.uk

31 January 2016

Dear Mayor Johnson

'Major changes' proposed to Parking Standards in the London Plan

I am writing on behalf of Clean Air in London (CAL) to draw your attention to the recommendations made by Mr David Hogger in the 'Inspector's Report of 15 December 2015 on the Examination in Public into the Minor Alterations to the London Plan' that relate to Parking Standards and make further representations. See:

<https://www.london.gov.uk/what-we-do/planning/london-plan/minor-alterations-london-plan/minor-alterations-london-plan-2015>

CAL remains firmly of the view that, given the importance of achieving good air quality and the increasing public awareness of the dangers to health and life posed by air pollution, the proposed changes to Parking Standards which, without prior commitments to full mitigation in space and time, would dangerously increase air pollution, are **major** and not minor. CAL believes for that reason that the proposed changes to Parking Standards must be withdrawn by the Mayor and considered only when the London Plan is revised in full.

CAL's view is supported by the Inspector's report that warns that any change made by the Greater London Authority (GLA) in relation to Parking Standards should include "**a more specific reference to the consideration of air quality implications**" (at 6.42k on page 16 of the report) and must meet rigorous tests before proceeding (see below).

Breaches of air quality laws in London this month for the whole of 2016, highlight that adherence to air pollution limits is of paramount importance for the health and well-being for the citizens of London. If the parking changes are implemented despite CAL's robust objection then, as a minimum, the Mayor must mitigate, with new measures, the **additional** detrimental effects in full in space and time.

The Inspector highlights that there are already air quality measures in place to reduce concentrations of nitrogen dioxide (NO₂) (that tend to be amongst the highest in the world along many roads in central London and elsewhere) in London.

These measures include:

- the introduction of the so called Ultra-Low Emission Zone in 2020, which might decrease emissions of NOx by about 50% within the Zone and by about 14% London-wide;
- the availability of the Mayor's Air Quality Fund to support London Boroughs in tackling local air quality hotspots;
- the identification of Low Emission Neighbourhoods which could contribute to reducing overall vehicle kilometres and encouraging the use of low-emission vehicles;
- the promotion of the Ultra-Low Emission Vehicle Delivery Plan;
- the implementation of London Plan policy 7.14 which states that all major developments should be 'at least air quality neutral';
- retrofitting homes and other buildings with energy efficient measures; and
- investing in green infrastructure.

The report confirms that the Mayor is committed already to all of the above mitigation techniques. It follows that, if the proposed changes to Parking Standards proceed, all those steps must be taken. However it also follows that these existing measures cannot be considered again as mitigation for a weakening of the Parking Standards which has not yet been decided upon. As you know, there is still no prospect of air quality laws being complied with throughout London before 2025 at the earliest and so much more mitigation is needed.

The report goes on to state that in addition to the above measures it must be **“clearly demonstrated through appropriate modelling and monitoring mechanisms**, that mitigation measures outweigh the predicted 0.5% decrease in air quality”. It is stated that **“the onus is on the Mayor** in co-operation with the London Boroughs” to ensure the above recommendations are achieved. Mr Hogger must be congratulated for imposing such a heavy burden of proof on the Mayor before the Mayor could proceed with changes to the Parking Standards.

With this in mind CAL wishes to reiterate the importance of having accurate and up-to-date monitoring and modelling mechanisms for the purpose of examining air quality. We take the words “clearly demonstrate” to mean that the Mayor must prove that the techniques involved with monitoring, measurement and mitigation of **additional air quality measures** are innovative, robust, certain and fully funded before proceeding with any proposed weakening of Parking Standards. It also means that the Mayor must be able to show that new mitigation measures will ensure there is no worsening of air pollution where Parking Standards might be relaxed i.e. per the Mc Cracken QC opinion on the importance of Directive 2008/50/EC in planning decisions.

CAL also considers that the proposed weakening of the Parking Standards with responsibilities passed to local authorities to comply with Directive 2008/50/EC represents a shocking and unacceptable 'passing of the buck' by the Mayor.

CAL urges the Mayor again to withdraw the proposed changes to Parking Standards in the London Plan as they represent a 'major change', not a minor alteration, that must be considered only when there is a full revision of the London Plan.

If the Mayor rejects our objections and wishes to proceed with the proposed changes to Parking Standards, CAL asks the Mayor to confirm please in writing to us that he will “**clearly demonstrate through appropriate modelling and monitoring mechanisms**, that mitigation measures outweigh the predicted 0.5% decrease in air quality” before proceeding with the changes to the London Plan.

I have copied this letter to Mr Hogger and Nicky Gavron as Chair of the London Assembly’s Planning Committee with a formal request that the London Assembly consider our objections.

I look forward to hearing from you.

Yours sincerely

Simon Birkett
Founder and Director

cc:

Mr David Hogger, Planning Inspector
Nicky Gavron AM, Chair, Planning Committee, London Assembly