



RTPI

mediation of space · making of place

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To whom it may concern,

Response to consultation on the draft UK Air Quality Plan

The RTPI welcomes the opportunity to provide evidence to the Joint Air Quality Unit consultation on the draft UK Air Quality Plan for tackling nitrogen dioxide.

The RTPI is the largest professional institute for planners in Europe, representing some 24,000 spatial planners. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

Please see our submission to the consultation below.

Yours faithfully,

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How satisfied are you that the proposed measures set out in this consultation will address the problem of nitrogen dioxide as quickly as possible?

Dissatisfied

Comments:

1. The draft plan is clear on the serious public health impacts from poor and often illegal levels of air pollution in towns and cities. The 2016 High Court ruling requires the government to produce an Air Quality Plan to achieve legal compliance 'by the soonest date possible'. This response considers both short-term measures to achieve compliance and the long-term role of planning in creating the conditions for improved air quality.

The role of planning in improving air quality

2. The high levels vehicle-based air pollution experienced in many urban areas results in part from a legacy of low density, car-dependent urban expansion on the fringes of towns and cities over previous decades. This contributed to a rise in car ownership and private vehicle use, and was exacerbated by a decline in the cost of motoring, fragmentation in public transport networks, the expansion of the road network to meet increased demand.
3. The plan says little on the critical relationship between urban form, infrastructure and air quality, or the contribution of planning to improving air quality. This is despite considerable evidence on the impact that decisions on urban form has on public health, social inclusion and air quality (see Annex 1). These will be the subject of a [forthcoming RTPi research paper](#).
4. The planning system in each of the UK Nations contains key levers to improve air quality. In England, this includes the development management (DM) process, which helps to mitigate air pollution in the short-term, and the Local Plan-making process, which helps ensure that new development does not create negative impacts over the long term. These are explained in more detail below.
5. The National Planning Policy Framework (NPPF) contains a number of policies related to air quality. It sets out the need to guide development towards locations which make the fullest use of public transport, walking and cycling and reduce the need to travel by car, to locate key services like schools and hospitals away from heavily polluted areas, and to consider the cumulative impacts of development on air quality. Local Plans, which allocate sites for development, should contain effective policies which meet these requirements, managing urban growth in a way that does not increase air pollution. The "[Cleaner Air for Scotland Strategy](#)", published by Scottish Government in November 2015, is much clearer on the role that planning should play in shaping sustainable settlement patterns, reducing car dependency and promoting travel by public and active modes. The draft UK Air Quality Plan should contain a similar emphasis on the role of effective Local Plan policies.
6. In the short-term, planning authorities can use the DM process to assess whether developments proposals are compliant with local and national policies on air quality. This includes considering their impact on Air Quality Action Plans, and the ability of the

development – through design and layout - to encourage air circulation and pollution dispersal. It can require that Travel Plans or Transport Assessments and Statements are prepared, which provide evidence on the likely transport impacts of development and set out mitigation measures as necessary. It can also be used to secure developer contributions for measures to tackle air quality, funding public and active transport infrastructure, electric vehicle charging points, green infrastructure, and low/zero carbon on-site energy generation. [Recently published guidance](#) from RTPI Scotland and Environmental Protection Scotland provides clear examples of how DM contributes towards improved air quality, and this connection should again be emphasised within the draft UK Air Quality Plan.

7. The RTPI has expressed concern that changes to planning policy, and pressure to meet housing numbers, may result in more developments occurring in unsustainable locations, generating increased traffic and air pollution. In England, an increased emphasis within the National Planning Policy Framework (NPPF) on the speed of delivery and returns to land owners/developers can favour dispersed patterns of development in remote locations, where land is cheaper and easier to purchase and develop. Meanwhile a fragmented approach to transport and land use planning, both within and across local authority boundaries, can mean that new development is not supported by the infrastructure needed to encourage sustainable modes of travel.
8. There is a lack of reliable analysis on where new development is occurring, the relationship to transport and employment, and the likely impact on travel patterns. The RTPI has taken steps to address this with its '[Location of Development](#)' research project, which mapped the location of over 165,000 housing permissions in twelve city-regions across England. This study found, for example, that only 13% of recent permissions are located within easy walking or cycling distance of a railway station, and that 4.5% were located over 20km away from major areas of employment. The RTPI will repeat this analysis in 2017 to explore how these trends are changing, but the initial analysis shows there is no room for complacency, with new patterns of dispersed development already occurring in some city-regions. Measures to increase housing supply must not be pursued in isolation - planners must be able to balance these objectives with the broader objectives of promoting sustainable travel and reducing air pollution. Better monitoring of development patterns by government – enabled with open data - would assist local authorities in understand the cumulative impacts of development decisions on transport use, and by extension air pollution.
9. This draft plan should be clear on the need for a more integrated approach to transport and land use planning in order to tackle air pollution over the long-term, while providing other wider benefits. A good place to start would be ensuring that local authorities and Combined Authorities have the resources and technical capacity to develop integrated spatial maps of land use, transport infrastructure and air quality, in order to inform the location of development, coordinate the provision of sustainable transport infrastructure, and direct investment in mitigation.
10. This must also be supported by central government with strong and targeted investment in sustainable public and active transport infrastructure, which again receives little mention in the plan. This is despite repeated evidence in the technical report on the

significant value for money from previous investment programmes represented, including:

- Showing that an investment of £15m through the 2004-2009 Sustainable Transport Towns programme reduced the number of car journeys by 8%, and produced a benefit-cost ratio (BCR) of 4.5:1 for decongestion (delivering £4.50 worth of benefit for every £1 invested). The BCR was estimated to double when the benefits to public health from air quality and active travel were added, along with the benefits from carbon reduction
- Investments of £225m through the 2011-2015 Local Sustainable Transport Fund generated a BCR of 5:1, including projects on smart ticketing, infrastructure for electric vehicles, walking and cycling, and the promotion of car clubs. Studies showed that “as well as offering air quality relief, reducing the need to travel by car has the potential for significant decongestion benefits – and where cycling and walking form part of the proposal significant health benefits can be expected too.”

Clean Air Zones

11. The technical report states that charging Clean Air Zones (CAZs) are the most effective way to bring UK cities into compliance with statutory NO₂ limits in the shortest possible time. In 2015 the government proposed that charging CAZs be established for Birmingham, Leeds, Nottingham, Derby and Southampton, and followed this in 2016 with a consultation on draft secondary legislation which would require them to be implemented by the relevant local authorities.
12. Paragraph 71 of the draft plan seems to indicate that charging CAZs remain the preferred option for these five cities, with government expecting them to be set up by the end of 2019, and for statutory limits to be achieved by 2020. It also suggests that if this approach were extended to the 36 other local authorities in breach of legal NO₂ levels, then most could achieve statutory limits by 2021. However, the draft plan then introduces uncertainty by indicating that charging CAZs should be viewed as a last resort, once local authorities have considered “all equally effective alternatives to deliver compliance”. From the evidence in the technical report, it seems clear that a combination of charging *and* non-charging CAZ measures will be needed to reduce NO₂ levels in these other local authorities in the shortest possible time.

Resources and capacity

13. At a time when urgency is needed, the draft plan also passes responsibility to local authorities – namely planning, transport and environment team - which are in many cases experiencing sustained budget cuts. Research from the RTPi and others has found a 46% reduction in budgeted spend for planning and development in single-tier authorities and county councils from 2010-11 to 2013-14. The draft plan offers no significant additional funding and, by favouring non-charging CAZs, limits their ability to raise extra revenue. The draft plan could be strengthened by addressing issues of resourcing and capacity at the local level, including mechanisms for sharing expertise between local authorities to ensure that strong air quality policies are embedded into strategic, local and neighbourhood plans, additional funding for monitoring and

enforcement, and establishing clear guidance and strict tests to help local authorities assess the effectiveness of charging versus non-charging CAZ measures.

Annex 1

Examples from the literature include a [2014 paper from the Government Office of Science/Foresight](#) which sets out the potential air quality impacts from different urban form policies, including intensification, polycentrism, new peripheral developments, entirely new settlements, and dispersed development in more rural areas (see pages 42 and 46). Useful [research from Melia et al.](#) (2011) discusses why positive measures to increase urban density need to be supported with wider interventions to promote modal shift and constrain traffic growth to promote density. The RTPi can provide additional links upon request.