

Sadiq Khan Esq.
The Mayor of London
The Queen's Walk
London
SE1 2AA

Kingston

30 December 2020

Dear Mr Khan

cc. Robert Jenrick, Ministry of Housing, Communities and Local Government

Open Letter

Call to stop publication of the "Publication London Plan" (the "London Plan")

I call on you not to publish the London Plan and to start afresh the process of determining housing targets for The Royal Borough of Kingston-upon-Thames ("Kingston") and other boroughs in Greater London, taking air pollution into consideration.

The 2017 SHLAA Methodology (the "SHLAA Methodology"), on which the figures for each London borough's housing targets in the Strategic Housing Land Availability Assessment (the "SHLAA") for the London Plan are based, removed all consideration of air pollution as a constraint on development capacity. As a result, extremely high housing targets have been established in the London Plan which have ignored pollution and air quality.

Meanwhile, there is no evidence that your plans to reduce air pollution over the period of the London Plan will have the desired effect, particularly in outer London Boroughs where public transport is often inadequate, where people rely on their cars for travel and where the majority of development is planned to take place in the London Plan. The reliance on road travel in places like Kingston is reinforced by statistics from the Department of Transport that show that the number of vehicle miles travelled in Kingston in 2019 was 0.67 billion, a figure that has shown a steep rise since 2012. Kingston Council's 2019 Local Implementation Plan 3 (the "LIP3") - on which your London Plan policies rely in order to implement pollution reduction plans in Kingston over the term of the London Plan - has still not been published.

Lastly, and most importantly, in light of the coroner's ruling on 16 December 2020 that London air pollution exposure was one of the causes of nine-year old Ella Kissi-Debrah's death, the approach taken to establishing housing targets in the London Plan - with no consideration of current or future levels of air pollution or air quality - can no longer be considered a sound basis for mass development plans across Greater London. The risk of harm to people, including other children like Ella Kissi-Debrah, from exposure to pollution that is in excess of World Health Organisation guidelines – and often by a significant margin - is simply too high.

The SHLAA Methodology was used to establish housing targets for each London borough for the period from 2019 to 2041 in the SHLAA. These targets have been transposed into the London Plan for an initial ten-year period. Kingston is just one of many boroughs that is set to become a high-growth area in the London Plan as a result of the SHLAA calculations. A large proportion of Kingston has also been targeted as a high growth "opportunity area". This is the first time that an entire London borough has been effectively designated as a "brownfield site" for large-scale development. However, there has been no health and equalities impact assessment at borough level, nor any strategic environmental assessment, of the effects of growth on the scale planned in Kingston. There

has thus been no assessment of the pollution that will arise from development on the scale that is planned, which represents a significant increase from historical levels of growth.

The Kingston Direction of Travel 2016 document (the "Direction of Travel") which you have used as the basis for establishing growth targets for Kingston in the 2017 SHLAA and the London Plan was not accompanied by any environmental assessment, nor by a Strategic Environmental Assessment as required by law under the Environmental Assessment of Plans and Programmes Regulations 2004. The Direction of Travel was also not accompanied by any equalities or health impact assessment and did not consider the effect of pollution from its proposals for development on a scale vastly in excess of previously agreed levels of growth. Similarly, the 2017 Development Scenario Testing documents for Kingston that provide detailed information on the assessed capacity of specific sites across Kingston were not accompanied by any environmental, equalities or health assessment, and did not consider the effect of assessed development capacities on pollution levels. Lastly, and relevant to the development capacity that sites across Greater London have been considered capable of bearing, the SHLAA Methodology removed consideration of air pollution as a constraint on housing targets for all London boroughs, including Kingston. The Environment Agency, the London Borough of Bexley, the London Borough of Islington, the London Forum of Amenity and Civic Services all made comments about the lack of an environmental constraint around air quality and of the need for it to be considered in the SHLAA Methodology. I voiced my own concerns at the Examination in Public Session on the new London Plan M19 at which the SHLAA and Housing Targets were discussed.

The effects on air quality from pollution from residential development planned on the scale laid out in the London Plan have been completely ignored in Kingston and across Greater London.

Do not let the death of a young girl and the courage that a mother has shown to fight for justice whilst suffering such a terrible loss be in vain.

I look forward to hearing from you.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Caroline Shah'. The signature is fluid and cursive, with a large initial 'C' and 'S'.

Caroline Shah