

Institute of
Air Quality
Management

2nd Floor, 34 Grosvenor Gardens
London
SW1W 0DH

Celeste Giusti
Sustainable Design and Construction
City Hall
The Queen's Walk
London
SE1 2BR

21st October 2013

Dear Celeste Giusti,

Re: Sustainable Design and Construction SPD

As you are aware, the Institute of Air Quality Management (IAQM) is the professional body that represents practitioners working within the fields of air quality science, air quality assessment and air quality management in the UK and, increasingly, overseas. It aims to be the authoritative voice for air quality by maintaining, enhancing and promoting the highest standards of working practices in the field and for the professional development of those who undertake this work.

From our recent conference *Planning for Better Air Quality*, to which you kindly contributed, you will be aware that our members work extensively within the planning system to ensure that air quality is given appropriate protection in planning policy and development control.

We are therefore pleased to see that the draft London SPD includes several elements that will assist with air quality management. In particular, we note the adoption of emission standards for new buildings, the clear guidance provided on when an air quality assessment is required, the prominence given to the important issue of reducing exposure to poor air quality, outdoors and indoors, and the guidance on how to comply with the Mayor's air quality neutral policy. We believe that this guidance is a very important element of the package of measures required to protect Londoners from the adverse impacts of poor air quality.

However, we would like to make the following suggestions.

Section 4.3.4

This section requires air quality dispersion modelling to be carried out in accordance with the London Councils' Air Quality and Planning Guidance. It should be made clear whether this includes the use of the guidance on determining significance and whether the Air Pollution Criteria should be used. There is more recent guidance from IAQM on significance criteria, which is currently being revised jointly with Environmental Protection UK.

This section should, in our opinion, explicitly include dust generating activities such as waste management and mineral sites, as poorly controlled dust can adversely impact on community amenity, as well as PM₁₀ concentrations. In addition, we believe it would be useful to extend the last bullet point to "includes biomass boilers and/or combined heat and power or industrial combustion sources". We are concerned that there are situations arising when industrial combustion processes smaller than the thermal input thresholds in the Environmental Permitting Regulations give rise to a significant change in air quality. There have been examples of the air quality implications of these developments being missed by planning officers.

Section 4.3.6

We are pleased that the GLA has largely adopted IAQM's approach of dividing works into different sources, and note that you have added non-road mobile machinery, which is a more significant issue in parts of London than it is elsewhere in the country.

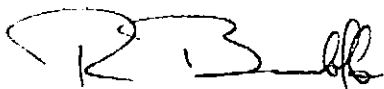
IAQM will be commenting on the draft of '*The control of dust and emissions from construction and demolition*' separately. We trust you received the email sent to you on 2nd October by Dr Holman regarding this document and we look to your response. We believe we should meet to discuss the implications of the new approach draft IAQM guidance as soon as possible, and look forward to hearing from you with a suggested date. I trust you agree that it makes sense for there to be a degree of consistency.

Section 4.3.7 (and elsewhere)

The IAQM believes that there is a potential problem in the way the planning consent process operates at present, in which point sources are sometimes accepted as part of schemes with inappropriate locations and heights relative to the new building or neighbouring buildings. The effect of structures on dispersing plumes can be very important in localised situations and may lead to avoidable adverse air quality. It would be helpful if the guidance obliged developers to consider this point and adhere to sound principles. There is also perhaps an opportunity to consider this issue in conjunction with the microclimate effects described earlier in the documents.

In summary we support the aims of the SPD and, apart from the suggestions outlined above, believe it is an excellent document that will assist in our aim of achieving better air quality in London.

Yours sincerely



Roger Barrowcliffe, Chair IAQM
and also for
Dr Claire Holman, Vice-Chair, IAQM