



Institute of
Air Quality
Management

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Bridget Haughan
Policy Advisor
Department of Environment, Food and Rural Affairs
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Friday 1st November, 2013

Dear Ms Haughan,

Call for Evidence – Review of the Clean Air Act

The IAQM is the professional body for air quality professionals. The mission of the IAQM is 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. We are pleased to be able to contribute to this Review, which affects the work of many of our members.

General reflections

The IAQM supports the review and revision of the Clean Air Act. This legislation has its origins in a time when the control of air pollution was concerned almost exclusively with the burning of coal. Today, the problems of air quality are very different and the management of air quality requires a different emphasis. It is primarily for this reason that the IAQM would see this as an opportunity to reshape our approach to improving air quality, especially in urban areas.

Streamlining of legislation is a worthy aim and the IAQM supports this principle. We are equally concerned with ensuring that legislation is appropriate and effective. A modern Clean Air Act should be capable of controlling current and future air pollution and be an effective tool for air quality management. Simply removing elements of the existing Act will not be commensurate with this.

Dark Smoke

The provisions of the Clean Air Act for dark smoke will continue to have relevance in the future. Uncontrolled burning of waste and other material is a significant source of some pollutants, such as dioxins and poly cyclic aromatic hydrocarbons, and a means of enforcing the prohibition of combustion that leads to dark smoke is worth retaining. Smoke can be a source of annoyance for many people and it is appropriate that it continues to be treated as a loss of amenity.

Smoke, Grit, Dust and Fumes

This part of the existing legislation is concerned with the old problems associated with the burning of coal in urban areas. As such, it is the least relevant part of the Act to current and future problems. Some of the principles should, however, be retained, as many individually small combustion processes can lead to avoidable air quality problems. The difference is that the current combustion sources are likely to be fired by natural gas or biomass, rather than coal or oil. These fuels produce

NO_x and fine particulate matter, rather than SO₂ and grit, and therefore add to the urban air quality problems created partly by road transport. In many towns and cities, the many small stationary sources of NO_x are likely to be a significant contributor to local NO₂ concentrations. Further, the trend towards decentralised electricity and heat generation is leading to the presence of more combustion processes in urban areas that are, essentially, unregulated. An environmental permit is required only for combustion processes of greater than 20MW thermal input. Most 'energy centres' associated with new developments are smaller than this but still substantial enough to contribute large localised impacts on NO₂ concentrations. In addition, many of these emission points are poorly sited on buildings and cause unnecessary air quality impacts. The previous guidance on chimney heights (D1) was a very useful tool, although primarily concerned with SO₂ and short term concentrations. There would be considerable merit in updating this guidance, such that new developments adopt sound principles in the selection of appropriate heights for emission stacks and locations away from adverse influences on dispersion.

The revised Act could also usefully promote emission standards for new boilers and other combustion processes likely to be specified in new buildings. This is the approach taken by the Greater London Authority in its new draft planning guidance and the IAQM believes that a similar approach could be adopted by Defra.

Smoke Control Areas

Whilst there is no longer a widespread problem with domestic coal burning and the consequent high PM concentrations, there remains a need to exercise control over the uncontrolled burning of wood. Recent research has shown that wood burning is a contributor to urban concentrations of fine and ultrafine particles. Cooking activities too are a significant source. Framing legislation to protect public health and which also allows businesses to flourish is not always straightforward, but in this case it is importance that a balance is struck by ensuring that some control is retained, primarily through the setting of standards for the proper use of fuels such as wood that have the potential to contribute to public exposure to particles.

Concluding Remarks

In conclusion, the IAQM would like to see the Clean Air Act revised such that it is an effective mechanism for addressing the air quality problems of today and tomorrow. It should give sufficient power and authority to local authorities for air quality management and also promote good practice in new developments.

Yours sincerely,



Roger Barrowcliffe
Chair