



Institute of
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Management

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25th November 2013

Dear Celeste

Re: The Control of Dust and Emissions During Construction and Demolition: Draft Supplementary Planning Guidance, Mayor of London

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 of 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.

The IAQM believes that this SPG and the one on Sustainable Design and Construction are very important for improving air quality in London. As you know, we have provided guidance for the assessment of construction (including demolition) impacts for our members and others to use. The first version was developed in co-operation with the GLA. We are pleased that you have adopted our approach to the assessment of the risk of dust impacts within your draft SPG. It is perhaps a little unfortunate that your current consultation has coincided with our revision of the IAQM guidance and that we have not worked as closely together on these documents as previously.

The draft revised IAQM guidance is being issued for consultation, hopefully in the first week of December, with the aim of issuing the final version by the end of January 2014. The approach to the risk assessment has changed, with the sensitivity of the area and mitigation measures being given more prominence. We have already sent the GLA the draft version of our revised Guidance with the new approach.

We believe clarity in the planning process is important, and accept that some development, including stand-alone demolition, does not require planning consent. We think the process outlined in your two draft SPGs needs some further simplification to ensure that the impacts are controlled effectively. We have included in our draft guidance a flowchart, attached, which you might find useful.

The draft Sustainable Design and Construction SPG required construction impacts to be considered as part of the Air Quality Assessment (AQA) of major developments. The draft Control of Dust and Emissions SPD requires an Air Quality Statement (AQA) to be submitted to the LPA prior to commencement of the work. . Implementation Point 1 then mentions conditions and S106 agreements. It is unclear what the relationship is between the AQA and the AQS. Are they the same document? Or is the AQS only for proposed developments with permitted developments rights? It seems more appropriate that the dust risk assessment should be submitted as part of the application, so that conditions/S106 agreements can be secured.

Submission immediately prior to the commencement of work is too late in the process, unless this is meant to apply only to those developments which do not require planning consent.

Your AQS requirements include details that would not be available during the planning stage; they will only become available once a main or principal contractor, and possibly some sub-contractors (such as a demolition contractor) are appointed. It is only at this stage that the method statements are developed. It should be noted that method statements are often insufficiently detailed with respect to dust emission control, which is why in our guidance we have used the term Dust Management Plan.

The draft IAQM Guidance includes a detailed list of mitigation measures, based largely on an early draft GLA list and therefore is very similar to the draft SPD measures although the wording is different in places. We have not explicitly included NRMM in our guidance because we do not believe it is a significant source outside central London, and our Guidance is national, but it does make reference to the GLA requirements.

One measure that raised concern amongst members of the IAQM working group is the use of recycled water for dust suppression. Some dust suppression equipment can create very fine inhalable water droplets, and recycled water can contain micro-organisms or other contaminants that may affect human health. Also the group was unsure what the term 'recycled water' means, as water is recycled by Thames Water many times before supply to customer as mains water. If it is included in your list of measures this may be better expressed as 'grey water', rain water or terms that imply that it is not treated mains water.

Please note that Appendix 8: Air Quality Control Measures has missed the measures specifically applicable to construction activities.

We trust our comments are helpful and that we can work together in the future to develop guidance for the improvement in air quality.



Roger Barrowcliffe,
Chair IAQM

cc Elliot Treharne, GLA
Claire Holman Vice Chair IAQM
Adam Donnan, IAQM / IES Secretariat

Extract from Draft IAQM Draft Guidance on the Assessment of Dust from Demolition and Construction

Figure 1: Responsibilities for Dust Mitigation from Demolition and Construction Sites

