City of London Corporation Committee Report

Committee(s): Planning and Transportation - For Decision Port Health and Environmental Services - For Information	**Date:** 22/06/2026 21/07/2026
Subject: Air Quality Supplementary Planning Document	**Public report:** P&T - For Decision PHES - For Information
This proposal: • **delivers Corporate Plan 2024-29 outcomes** • **helps to deliver statutory duties.**	**Corporate Plan Outcomes**: Leading sustainable environment. Providing excellent services. Diverse engaged communities. **Statutory duties**: Local Air Quality Management.
Does this proposal require extra revenue and/or capital spending?	No
Report of:	Katie Stewart, Executive Director, Environment.
Report author:	Ruth Calderwood, Air Quality Manager, Environment Department.

Summary

A draft Air Quality Supplementary Planning Document (SPD) was approved for consultation by the Planning and Transportation Committee in March 2026. It was also presented to the Port Health and Environmental Services Committee in April 2026. It provides detailed guidance on how applicants should manage and minimise emissions of air pollutants to comply with policies HL2: Air Quality and HL9: Health Impact Assessments in the City Plan 2040.

The draft SPD was published for consultation from 16 March to 15 April 2026. A Consultation Statement is attached at Appendix 1. Sixteen written representations were received, containing 100 comments. A table setting out all written comments received, with any subsequent changes made to the draft SPD as a result of the comment, is attached at Appendix 1a to the Consultation Statement.

The consultation led to relatively minor changes to the draft SPD. The final version is attached at Appendix 2 to this document. This report seeks authorisation to adopt the Air Quality SPD by the Government's deadline of the end of June, and to be used in planning decisions within the Square Mile from 16 November 2026.

Recommendation(s)

Planning and Transportation Committee Members are asked to:

- Approve the final Air Quality SPD, attached at Appendix 2, with the adoption date to be no later than 30 June 2026.
- Agree that the proposed implementation date of the SPD will be 16 November 2026, conditional on the prior adoption of the City Plan 2040, from which date the current Air Quality SPD 2017 will be revoked and will no longer apply.

Port Health and Environmental Services Committee Members are asked to:

- Note the report.

Main Report

Background

1. The planning system plays an important role in reducing emissions of air pollution and limiting exposure to poor air quality. A draft Air Quality SPD was approved for consultation by the Planning and Transportation Committee in March 2026. It provides detailed guidance on how applicants should manage and minimise emissions of air pollution to comply with policies HL2: Air Quality and HL9: Health Impact Assessments in the City Plan 2040.

2. The draft SPD and supporting material were published for consultation from 16 March to 15 April 2026. A Consultation Statement is attached at Appendix 1.

3. The documents were available to view at the City Corporation's principal offices, the Square Mile libraries and on the City Corporation website. The website also contained links to the 'Konveio' consultation portal. All people registered on the City Corporation's local plan database were informed of the consultation by email, including information on where to find the SPD and supporting documents.

4. In person and online consultation events also took place. These events were promoted and publicised via social media, City Resident newsletters, posters and leaflets and via other networks.

Consultation Response

5. A total of 16 representations were received, containing 100 comments. There was strong overall support for the proposals. The main issues raised were:

    - Some concern over the application of air pollution damage costs to life safety diesel generators
    - Concern over the proposal to not apply damage costs to the construction phase of a development
    - Requests for clarification, for example over emission limits, how cumulative emissions will be assessed and the use of abbreviations
    - Policy issues outside of the scope of the Air Quality SPD, including those covered by the Code of Practice for Deconstruction and Construction
    - Requests for further detail on how any money obtained through air pollution damage costs would be spent, with suggestions for additional allocation

6. A table containing all written comments received, and any changes made to the draft SPD as a result of each comment is presented at Appendix 1a to the Consultation Statement. Overall, relatively minor changes were made to the draft SPD, and the final version is attached at Appendix 2.

7. The SPD was prepared using the results of two rounds of engagement: early informal engagement in Autumn 2025 and formal Regulation 12 consultation in March/April 2026. The results of the consultation and engagement are set out in the Engagement Summary at: https://www.cityoflondon.gov.uk/assets/Services-Environment/SPD-Autumn-Engagement-What-We-Heard.pdf and the formal Consultation Statement included at Appendix 1. The Consultation Statement has been prepared to satisfy the requirements of Regulation 12a of the Town and Country Planning (Local Planning) Regulations 2012 (the 'Regulations').

8. A Strategic Environmental Assessment (SEA) screening opinion was sought from the Statutory Environmental Bodies in Autumn 2025. Comments received confirmed that a full SEA was not required and therefore has not been prepared (see Appendix 3).

Implementation

9. As the new Air Quality SPD provides guidance relating to Policies HL2, HL9 of the City Plan 2040, it can only be used in planning decisions once the City Plan has been adopted.

10. Subject to member approval, the SPD will be adopted before 30 June 2026. However, officers are recommending that its implementation is conditional on the prior adoption of the City Plan 2040, and that it is not fully implemented until 16 November 2026. Accordingly, any new requirements or obligations

should not be applied to planning permissions which are issued before this date. This will provide certainty for developers currently within the application process, especially those schemes which have an existing resolution to grant permission subject to a section 106 agreement which is being progressed.

Next steps

11. In accordance with Regulation 11 of the 'Regulations', an Adoption Statement will be prepared and made available on the City Corporation's website. This will serve to confirm the date of adoption and implementation; modifications made to the SPD following consultation; and notice of any person wishing to pursue judicial review on the process of adoption. Notice of the revocation of the current Air Quality SPD (2017) will also be given under the legislation.

Corporate & Strategic Implications

Strategic implications

12. The Air Quality SPD directly supports the City Plan 2040. It clarifies how development will be required to meet policies HL2: Air Quality and HL9: Health Impact Assessments.

13. The Air Quality SPD supports the delivery of the Corporate Plan 2024 - 2029, particularly for the following outcomes:

    - Leading sustainable environment
    - Providing excellent services

Financial implications

14. No new funding is being requested. The aim of the SPD is not to raise revenue but to encourage developers to minimise emissions of air pollution associated with their proposals. Where damage costs are applied, there is the potential for increased income.

Resource implications

15. The SPD has been developed within existing resources and will streamline internal assessment processes.

Legal implications

16. The SPD has been prepared in full accordance with the Town and Country Planning (Local Planning) Regulations 2012 and it reflects the requirements of the Community Infrastructure Levy Regulations, 2010 which set limitations on the use of planning obligations where they are to constitute a reason for granting planning permission (Regulation 122). In these circumstances a

planning obligation must be (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development.

17. Legal advice has been sought in relation to the timing of the SPD adoption in relation to the City Plan adoption. The intention is that the SPD will be adopted in June 2026 (ahead of the Government deadline) but will not come into effect or be applied until 16 November 2026 following the City Plan's adoption. It is noted that at the time of adoption an SPD must not conflict with the adopted development plan, which at this time is the City of London Local Plan 2015. As the SPD is not intended to support the Local Plan 2015 and will not be applied until the City Plan 2040 has been adopted, it is not considered that there is any conflict with the Local Plan 2015.

Risk implications

18. Air quality is a departmental risk reviewed quarterly. Engagement with industry experts has helped to shape the SPD in order to mitigate any potential risks associated with its implementation.

Equalities implications

19. The Public Sector Equality Duty is an ongoing requirement and has been considered by officers throughout the preparation of the Air Quality SPD. An Equalities Impact Assessment was completed for the draft SPD (see Appendix 2 to Planning and Transportation Committee item, 13 March 2026). All protected and additional groups were assessed. The SPD is not expected to have a negative impact on any group. Improving air quality is beneficial for all sectors of the community.

Climate implications

20. By reducing emissions of air pollutants, the SPD will directly support delivery of the Climate Action Strategy and contribute to the City's transition to net zero by 2040.

Security implications

21. None.

Conclusion

22. The Air Quality SPD provides clear, updated guidance on how development proposals must address air pollution impacts to meet the requirements of the City Plan 2040. Its aim is to ensure emissions are avoided wherever possible, minimised where unavoidable, and compensated for through damage costs where necessary. The updated SPD will support improved air quality, better

health outcomes for City communities, and support progress towards a net-zero carbon City by 2040.

Appendices

- Appendix 1 - Air Quality SPD Consultation Statement (which includes the consultation responses and action taken).
- Appendix 2 - Air Quality SPD
- Appendix 3 - SEA Screening responses to the Air Quality, Celebrating Heritage, Planning Obligations and Offices SPDs

Background documents

- Report to the Planning and Transportation Committee on 13 March 2026- Draft Air Quality SPD

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