Appendix 1

Air Quality SPD Consultation Statement

Introduction

This document is the 'Consultation Statement' under Section 12 (a) of the Town and Country Planning (Local Planning) Regulations, 2012. It sets out the dates and detail of the formal public consultation, and informal engagement, carried out with regard to the Air Quality SPD.

A 'What We Heard' document sets out the detail of the informal engagement which took place in Autumn 2025.

Scope of Regulation 12/13 consultation

The draft SPD and supporting material were made available for consultation from 16 March to 15 April 2026 at the City Corporation's principal offices, the Square Mile libraries and on the City Corporation website: Planning guidance - City of London. The website 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 SPDs and supporting documents. In addition, 24 key air quality stakeholders were emailed a copy of the consultation.

A series of consultation events took place as detailed below. These events were promoted and publicised via social media, City Resident newsletters, posters and leaflets and via other networks.

- 24 March 9:00 -10:30am SPD information session(external link) at Aldgate Centre EC3N 1AB
- 31 March 6:30 - 8pm Residents session(external link) at Artizan Street Library E1 7AF
- 1 April 10 -11:00am Online developer's technical session
- 14 May 9 - 10:00am In person meeting with City Property Association (CPA)

Summary of the main issues raised

A total of 16 written responses, which contained 100 comments, were received.

Main issues:

- There was strong overall support for the proposals
- Some concern was raised over the application of air pollution damage costs to life safety diesel generators
- Some concern was raised over the proposal to not apply damage costs to the construction phase of a development

- Points of clarification, for example over emission limits, how cumulative emissions will be assessed and the use of acronyms
- Policy issues outside of the scope of the Air Quality SPD, including those covered by City of London Air Quality Strategy and the Code of Practice for Deconstruction and Construction
- Request for further detail on how any money obtained through air pollution damage costs would be spent, with suggestions for allocation

Points were also raised in person at the consultation events, and when the draft document was presented to Planning and Transportation Committee and Port Health and Environmental Services Committee.

How those issues have been addressed in the SPD

In line with the requirements of the Regulations, all written responses, and how each comment has been addressed, are listed in Appendix 1a to this Consultation Statement.

In addition to the written comments, the points raised in person that resulted in a change to the draft SPD included:

- A request for clarity with acronyms to make it easier to read – this has been addressed by writing each item out in full at the start of each chapter.
- If idling vehicle engines can be incorporated – this has been added as a requirement for inclusion in the Delivery and Service Management Plan.
- Concerns relating to air pollution damage costs for life safety generators – detailed information was sent to the CPA demonstrating how costs can be substantially reduced by installing good technology, using cleaner fuel and through good management.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
Air Quality Team, Greater London Authority	The GLA welcome the City of London's draft air quality SPD. It includes a number of impactful policies which have the potential to positively contribute towards the City of London's and the Mayor's aim of aligning with the World Health Organization's air quality guidelines. We also welcome the publication of the Air Quality SPD EqIA alongside the SPD. The GLA are particularly supportive of the following themes outlined in City of London's draft air quality SPD: •Discouraging the use of CHP and biomass boilers. •The requirement for Delivery and Service Plans for all major developments. •A focus on commercial cooking including a requirement for zero-emission cooking appliances where possible, and specific requirements for the location of flues for cooking, generators, and other combustion sources. •Using building design to minimise pollution ingress and poor indoor air quality. •Encouraging contractors to use electric NRMM where available and requiring mains power supplies to all construction sites as soon as possible. •The use of an emergency power supply hierarchy where diesel generators are the least desirable power source. The Draft SPD sets out several proposals including a requirement for back-up generator testing to not take place during days when the Daily Air Quality Index is 'Moderate' or above, and when the weather is 'calm.' The GLA would welcome more detail for developers on how this is defined, including what is considered 'calm' weather, and which forecasting service needs to show moderate for this to be the case. The GLA has not reviewed the Draft SPD at a detailed policy level and therefore is not in a position to provide comments on individual policies set out in the SPD, nor	The support for the proposals listed in the consultation response is welcome. The definition of calm weather, and which forecasting service to use, to be clarified in the final SPD.	''still weather' amended to 'light wind', with definition given as wind speed < 5mph. Light used rather than calm to align better with Beaufort Scale 1-3. DAQI resource updated to 'current City of London contractor'. The contractor will be signposted in the monitoring section of the City of London Air Quality webpage; the Air Quality SPD now points to this.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	the metrics included within. Following the consultation, should the City of London wish to discuss a specific policy within their draft SPD in detail with the GLA, we welcome them to contact airqualitylondon@london.gov.uk where we can set up a meeting.		
City Resident	The planning system plays an important role in reducing emissions of air **pollutants**, as well as minimising exposure to poor air quality through good design.	The text has been amended.	Changed 'pollution' to 'pollutants'.
City Resident	The City Corporation Air Quality Strategy 2025 to 2030 (AQS)[2] recognises this with its aim to deliver air quality that is better than national standards.	Acronyms have been reviewed and updated.	Introduced the acronym AQS for the City of London Air Quality Strategy 2025 - 2030. All acronyms have been written out in full at the start of each new chapter for ease of reading.
City Resident	The City Plan 2040 supports the aims of the **AQS**, principally through Policy HL2: Air Quality and Policy HL9: Health Impact Assessment	Acronyms have been reviewed and updated.	Introduced the acronym AQS for the City of London Air Quality Strategy 2025 - 2030. All acronyms have been written out in full at the start of each new chapter for ease of reading.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
City Resident	In addition to the policies in the City Plan **2040**, the Department for Environment, Food and Rural Affairs	The document text has been reviewed for consistency.	'City Plan 2040' is used throughout.
City Resident	This aligns with the broader shift in planning policy from input-based assessments toward an outcomes-focused approach with the overall aim being for the minimum amount of air **pollutants** to be emitted and for exposure to air pollution to be minimised.	The text has been amended.	Updated 'pollution' to 'pollutants'
City Resident	Air pollution damage costs will then be applied to any remaining operational emissions, to help to mitigate the adverse impact on health of the development, thereby supporting the delivery of Policy HL9 of the City Plan **2040.**	The document text has been reviewed for consistency.	'City Plan 2040' used throughout.
City Resident	The use of biomass for heating can give rise to significant emissions of particulate matter; and consequently, the use of biomass in the Square Mile **should not be considered.** Is there any justifiable reason for using biomass in a new development or retrofit?	The City Corporation cannot prevent the installation of a biomass boiler. It is very unlikely that one would be installed. However, should this happen, the air pollution damage costs would be high, reflecting the cost to society from the air pollution associated with it.	No change made.
City Resident	The Emergency Power Supply Hierarchy in the City Corporation Planning for **Sustainability** SPD[12] should be applied.	All acronyms have been reviewed and amended if required.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
City Resident	**Testing should not be completed during still weather conditions, and when the Daily Air Quality Index (DAQI) within the Square Mile is 'Moderate' or above. Is the highlighted section correct?**	The definition of calm weather and which forecasting service to use has been clarified.	'still weather' has been amended to 'light wind', with a definition given as wind speed < 5mph. 'Light' used rather than 'calm' to align with Beaufort Scale 1-3. The Daily Air Quality Index resource has been clarified to be the City of London independent air quality data manager.
City Resident	Development in the Square Mile is required to be car-free15&16. A high number of delivery and service vehicles and taxis and Private Hire Vehicles (PHVs) **is** associated with development in the City of London, and emissions from these should be minimised **as far as** possible.	The document text has been amended.	'where' updated to 'as far as'.
City Resident	DSP requirements chart: It would be interesting to see the percentage of zero tailpipe emission vehicles in the Square Mile currently being used for deliveries and servicing. The higher the percentage, the sooner the use of such vehicles can be made mandatory. Except for some HGVs and NRMMs such as cranes, "where possible" is unnecessary. "Idling engines"?	The Delivery and Service Plan Requirements have been clarified.	DSP Requirements have been updated, with the following point added: 'Implementation of a no idling policy.'

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
City Resident	Electric appliances are the cleanest option for cooking and should be used **where possible.**	The document text has been reviewed and amended if appropriate.	No change made.
City Resident	Zero-emission cooking appliances should be used **where possible.**	The document text has been reviewed and amended if appropriate.	No change made.
City Resident	Through **the AQS**,the City Corporation has committed to a pathway to meet the 2021 World Health Organization (WHO) Air Quality Guidelines (AQGs).	All acronyms have been reviewed.	Introduced the acronym AQS for the City of London Air Quality Strategy 2025 - 2030. All acronyms have been written out in full at the start of each new chapter for ease of reading.
City Resident	The principles outlined in Building Regulations Ventilation Approved Document F23 must be followed to minimise the intake of external pollutants, particularly for development in areas that breach the aims of the **AQS.**	All acronyms have been reviewed.	Introduced the acronym AQS for the City of London Air Quality Strategy 2025 - 2030. All acronyms have been written out in full at the start of each new chapter for ease of reading

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
City Resident	In line with Policy OS4: Biodiversity Net Gain of the City Plan **2040**, all major developments are required to submit Urban Greening Factor	The document text has been reviewed for consistency.	'City Plan 2040' used throughout.
City Resident	Development should be designed to avoid air ingress to a building from ambient air that does not meet the aims of the **AQS**	All acronyms have been reviewed.	Introduced the acronym AQS for the City of London Air Quality Strategy 2025 - 2030. All acronyms have been written out in full at the start of each new chapter for ease of reading
City Resident	Major developments must achieve an **UGF** of 0.3 and 3BU/ha, as a minimum	All acronyms have been reviewed.	'an Urban Greening Factor' updated to 'a UGF'.
City Resident	Construction, deconstruction and demolition **is** a significant source of air pollution. Best practice for minimising emissions of air pollutants from these activities is outlined in the **CoP.**	The document text has been reviewed.	'can be a significant source of air pollution' updated to 'is a significant source of air pollution in the Square Mile'.
City Resident	The City Corporation encourages contractors to go above these standards and use **electric** NRMM where available.	The document text has been reviewed.	'electric NRMM' updated to 'alternatives to diesel NRMM'.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
City Resident	A mains **electricity** power supply, temporary or permanent, should be secured as soon as possible on all construction sites, unless it can be demonstrated that it is not reasonably practicable. The use of generators to provide electricity on site should be avoided. If it cannot be avoided, justification for the proposed use of the generator must be detailed in the SoPW. Generators should not be installed on a construction site to solely **power** electric or hybrid NRMM. These must be **powered** using mains power supply. Charged?	The document text has been reviewed.	Text changed from 'powered' to 'charge and/or powered'.
City Resident	In accordance with **the City Plan 2040** Policy HL2, HL9 and S26, the City Corporation will seek offset contributions towards air pollution resulting from emissions of air pollutants, **NOx** and **PM2.5.** These air pollution damage costs estimate the societal impacts of emissions on human health, productivity, wellbeing and the environment and have been developed by **Defra.**	The document text, abbreviations and acronyms have been reviewed.	Added text 'of the City Plan 2040'.
City Resident	Any on site combustion plant (boilers, generators, **CHP**) in major planning applications	All acronyms have been reviewed.	No change made.
City Resident	All offsetting calculations should be provided in the **AQIA**, or subsequent documentation submitted to discharge a planning condition.	All acronyms have been reviewed.	No change made.
City Resident	Offsetting costs will be used by the City Corporation for air pollution improvement projects in the Square Mile and contribute to the aims of the **AQS**. The schemes would support the delivery of the **AQS** and fall into four categories: transport and public realm, infrastructure, improving public health and research	All acronyms have been reviewed.	Introduced the acronym AQS for the City of London Air Quality Strategy 2025 - 2030. All acronyms have been written out in full at the start of each new chapter for ease of reading.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
City Resident	Applicants must demonstrate that any major development complies with the requirements of **this SPD** by submitting an **AQIA.**	All acronyms have been reviewed.	No change made.
City Resident	As detailed in the City Plan **2040** 34 all developments in the Square Mile are required to be 'Air Quality Neutral' (AQN), as defined by the Mayor of London **(2023)** London Plan Guidance (LPG)35.	The document text has been reviewed for consistency and amended where appropriate. The date of issue of the Air Quality Neutral LPG is provided in the footnote.	'City Plan 2040' used throughout.
City Resident	In line with the **LPG**, Air Quality Positive **(AQP**)36 and **the** City Plan **2040**, AQP Statements are required for developments subject to an **EIA**. The Statement**s** must outline measures taken forward during the design stage to achieve the best possible outcomes for air quality.	The document text and acronyms have been reviewed.	No change made.
City Resident	Combustion Plant: • **CHP** • Biomass/biofuel boilers • A combustion-based backup generator for business continuity	All acronyms have been reviewed.	No change made.
City Resident	Proposals for developments that have sensitive receptors e.g., a school or nursery, may also require air quality modelling. Any such proposals should be discussed with the Air Quality Team. Homes?	Schools and nurseries are provided as examples, other examples include health centres, hospitals, care homes and dwellings.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		All proposals need to be agreed with the Air Quality Team.	
City Resident	When modelling is undertaken, predicted concentrations for the opening year of the development must be compared to the **AQS's** aims using a worst-case scenario. The City Corporation has designated relevant exposure as any location outside that is accessible to members of the public. All **AQS** aims apply to exposure, regardless of the pollutant averaging period.	All acronyms have been reviewed.	Introduced the acronym AQS for the City of London Air Quality Strategy 2025 - 2030. All acronyms have been written out in full at the start of each new chapter for ease of reading.
City Resident	Pollutants table pg. 11: NOx is used instead of NO2 in the Introduction and below. Is it necessary to use words and abbreviations?	Emissions are presented as NOx, and concentrations are presented as NO2. Consistency of abbreviations has been reviewed and amended where required.	No change made.
Environment Agency	We are supportive of the production of the Air Quality SPD. We are pleased to see that air quality impact assessments will be required for all major development as well as some non-major development. The general content is strong, and we are pleased that the SPD encourages energy switches, air quality issues from construction as well as how they can be managed through design.	The support for the SPD is welcome. The Air Quality SPD supports the delivery of	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	One way the SPD could improve is by providing some further commentary and data on the present air quality situation in the City of London and set out how the SPD will seek to improve this.	the City of London Air Quality Strategy which sets out current levels of air pollution and targets for improvement. Annual Status Reports are produced. These detail progress with the actions in the Strategy and contain the most up to date air quality concentrations.	

Clean Air London	CAL strongly supports the direction of travel of the proposals but encourages the Corporation to go much further, faster. In particular, CAL points to: 1. Please press for zero air emissions, wherever possible. 2. Please follow a 'One air' approach that would eliminate air pollutants and greenhouse gases. 3. 'Air quality neutral' means no worsening of air pollution. It does not mean the same as understood by carbon neutral or (more properly) zero carbon. AQN is a very weak standard to set, even as a minimum. 4. Please ensure that the City of London would comply fully with Directive (EU) 2024/2881 including its requirements to be met by 1 January 2030 and any conditions for subsequent postponements. This https://eur-lex.europa.eu/eli/dir/2024/2881/oj Our 27 neighbours are committed to compliance and the UK looks set to align. Please note that the Directive includes limit values for PM2.5 of 10ug/m3 and NO2 of 20 ug/m3 by 1 January 2030. 5. CHP should not be permitted in the City of London. It has a terrible track record of being over-specified and then operating below necessary operating standards, resulting in fumes. 6. Please do not allow BREEAM points to be obtained at the expense of air emissions. 7. Please check units used for emissions rates referred to on numbered page 6. They use commas not full stops. 8. All construction equipment should produce zero exhaust emissions or be electric or hydrogen-powered unless unavailable. See: https://www.knightsbridgeforum.org/best-practice-guidance-construction-standards-and-procedures/ 9. The Knightsbridge Neighbourhood Plan 2018-2037 (which was made on 11 December 2018) includes excellent policies on air, renewable energy, utilities, and health. Please see KBR 33, KBR 34, KBR 35 and KBR 40. For example, KBR35 highlights the need to minimise energy use, maximise energy efficiency and then use renewable energy. Please encourage developers to minimise 'unregulated' energy use i.e. used by occupants. CAL understands that many occupants no longer require standby emergency generators because information and activity exists in the 'Cloud'. https://www.knightsbridgeforum.org/media//documents/knp_made_version_december_2018_131218_website.pdf	The support for the SPD is welcome and the comments to go further and faster are noted. The proposals in the SPD support the delivery of net zero carbon across the City. The requirements of the SPD go beyond Air Quality Neutral. The SPD discourages the installation of Combined Heat and Power Plant. Construction equipment will be addressed in the update to the Construction Code of Practice. Comments noted regarding the Knightsbridge Neighbourhood Plan. The recommendation to set an accelerated pathway to achieve WHO 2021 Air Quality	Page 6: '273,15 updated to 273.15 and 101,3 updated to 101.3'.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		Guidelines is noted. This is not an issue to be addressed by the SPD but is included in the City Corporation Air Quality Strategy which sets goals for air quality in the Square Mile to be on a pathway to meet the WHO 2021 Air Quality Guidelines. The units on page 6 have been amended. Indoor air quality is to be addressed through the development design, as detailed in Section 2.	
Barbican and Golden Lane Neighbourhood Forum	General comments 1.We note (see introduction) that the ultimate aim is for development in the City to have zero operational emissions. But the rest of the SPD doesn't seem to follow through on this. The targets are weaker than the WHO recommended targets, and more importantly the SPD should be insisting on the best available technology – because that will change over the life of the Plan and may enable dramatic improvements in air quality.	The overall aim is for zero operational emissions. Where emissions cannot be designed out of a development they need to be reduced by using	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	The SPD should therefore be insisting on the best available technology with at a minimum the WHO limits.	'best available technology'. To reflect the fact that best available technology will change over the life of the plan, the SPD refers to a live checklist which will be available on the City Corporation web site. This will be updated to reflect best current technology and practice (see page 6). The SPD includes the requirement to design a development so that new cleaner technology can easily be installed as it becomes available.	
Barbican and Golden Lane Neighbourhood Forum	Specific comments 2.We query the hierarchy for emergency power supplies in 2.1.2. A secondary power source sounds good but is useless if the grid goes down. We wonder why battery storage is not the preferred option.	Where a secondary mains power supply is used, both the primary and secondary are taken from independent supplies. The developer	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		must demonstrate that steps have been taken to ensure that they would not both fail at the same time. This is in line with BS8519. The emergency power supplies hierarchy was introduced in the City of London Planning for Sustainability SPD, published in 2025, and is consistent with the Air Quality SPD. An assessment of the options was completed across a number of variables ensuring compliance with existing standards and regulations.	
Barbican and Golden Lane Neighbourhood Forum	3.We remain surprised at the prominence given to commercial cooking as a source of PM2.5 in the City in the Air Quality Strategy. The City's own data show that very few of the City's many restaurants use charcoal or wood for cooking (https://www.the-ies.org/resources/pm25-emissions-inventory-and-source-apportionment-city-london-col). We find it hard to believe that it is a more important contributor than construction and street works.	The data is taken from the London Atmospheric Emissions Inventory, which is produced by the Greater London Authority. While charcoal	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		and wood use in cooking is a source of particulates, the cooking process such as grilling and frying also contributes to PM2.5 emissions.	
Barbican and Golden Lane Neighbourhood Forum	4.The section on Construction, Deconstruction, and Demolition refers readers to the City's Code of Deconstruction and Construction, which is dated 2019 and is due for updating, but that has not yet happened. The current Code is weakly worded and very permissive; and experience as residents in the City living close to construction sites is that they are not models of well-regulated activity. They make noise and they pollute.	The SPD states that *'...references made in this document are current at the time of writing. Where documents are revised, the latest version(s) should be used.'* The CoP is currently being updated and when an updated version is adopted all development in the Square Mile will be required to adhere to this. The Deconstruction and Construction Code of Practice is being updated and will be published for	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		consultation during 2026.	
Barbican and Golden Lane Neighbourhood Forum	5.It is also not clear why offset calculations are not required for emissions associated with construction. If the damage costs are meant to incentivise developers to design their buildings to improve air quality, it is not clear why the same incentives should not be required to incentivise developers' contractors to minimise emissions of environmental pollutants – particularly as construction sites are such as dominant activity in the City and contribute significant amounts of particulates and NO2 [see p 7 of the City's Air Quality Strategy 2025-2030].	The City of London Deconstruction and Construction Code of Practice details how construction activity must be managed to minimise emissions of air pollutants. A construction levy is charged on most construction and is used in part to ensure emissions are minimised.	No change made.
Barbican and Golden Lane Neighbourhood Forum	6.Instead of justifying the lack of mitigation measures (which the code allows contractors to do), developers and their contractors should – as required by the rest of the SPD -to pay damage costs if they fail to mitigate.	The City of London Deconstruction and Construction Code of Practice details how construction activity must be managed to minimise emissions of air pollutants. A construction levy is charged on most	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		construction and is used in part to ensure emissions are minimised. The Deconstruction and Construction Code of Practice is being updated and will be published for consultation in 2026.	
DP9 on behalf of BNP Paribas	"Dear Sir / Madam, Representations on the Draft Air Quality SPD to support the implementation of the City Plan 2040 These representations are submitted to the City of London (CoL) on behalf of our client, BNP Paribas Asset Management ('BNPP AM') (formerly AXA Real Estate Investment Managers) (acting in its capacity as investment manager and advisor to its investors and clients) in respect of the consultation on the new and update SPD's. The SPDs are an update to the Planning Obligations SPD, and new SPDs covering Officers, Air Quality and Celebrating Heritage. These representations focus on the draft Air Quality SPD, and separate representations have been prepared on the other SPD's listed above where relevant. BNPP AM welcomes the opportunity to engage in this consultation that will feed into the City Plan 2040. Representations have been made previously on the City Plan 2040 Regulation 19 consultation (17 June 2024) and to the Tracked Changes' version of the City Plan 2040 Proposed Main and Additional Modifications to the Regulation 19 version (6 February 2026). The representations below provide commentary on specific items rather than comments on the entire draft SPD."	Comment noted.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
DP9 on behalf of BNP Paribas	New Air Quality Damage Costs The proposed Air Quality Damage Cost set out in the draft Air Quality SPD would apply to the replacement of a combustion plant, which BNPP AM understands includes standby generators, with contributions in the region of £20,000–£80,000 based on emission rates. However, emergency standby generators serve a fundamentally different purpose from operational combustion equipment, they are legally mandated to provide life-safety and business-critical resilience for systems such as emergency lighting, fire pumps and essential medical infrastructure. Their operation is limited to infrequent testing and genuine power-failure events, meaning they do not contribute to routine emissions. As such, applying the full Air Quality Damage Cost to equipment that cannot be removed, substituted or avoided would be disproportionate and would not achieve the policy objective of influencing design choices. An explicit exemption for emergency-only standby generators is therefore necessary to ensure the SPD remains reasonable, justified and aligned with statutory safety requirements. In addition, BNPP AM would welcome further clarification on whether the damage cost contributions will be ring fenced to provide additional air quality mitigation measures in the City.	Secondary (or standby/emergency) power supplies for safety purposes are required for particular types of development where loss of power would present a serious risk to life, health, or critical operations. Examples include large commercial buildings, high rise residential, hotels and hospitals. The secondary supply can include an alternative mains supply, a battery or generator. The SPD directs developers to consider the cleanest option. Through the application of air pollution damage costs, developers are encouraged to use the cleanest technology, and operate the plant to minimise emissions. The	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		SPD does not say that diesel generators are not allowed, though if they are installed damage costs would be applied to reflect the cost to society. If done carefully, the damage costs of a diesel generator used for life safety will be minimal. The damage cost contributions will be used to support the delivery of the City of Air Quality Strategy focussing on measures to improve air quality in the Square Mile.	
DP9 on behalf of BNP Paribas	Conclusion BNPP AM is pleased to have the opportunity to comment on draft Air Quality SPD to support the implementation of the City Plan 2040 and we would welcome the opportunity to further engage with Officers to discuss any specific elements within these representations. We trust the points raised in this representation will be taken into account and will be used to inform the final version of the Air Quality SPD. Should you have any queries or require any further information in respect of the above, please contact	Comment noted.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	Jonathan Smith or Elena Butterworth of this office. Yours faithfully DP9 Ltd.		
Marine Management Organisation	Dear City of London Planning Team, Apologies, I realise I've missed the 11am deadline today for this consultation. I hope you can still consider this response. MMO Marine Planning response to the City of London's Supplementary Planning Document (SPD) consultations on: • Air Quality SPD • Celebrating Heritage SPD • Offices SPD • Planning Obligations SPD Thank you for giving us the opportunity to comment on the above documents. Please find attached our standard response. I would just in addition recommend considering the Air Quality (AQ-1) and Heritage (HER-1) policies within the South East Marine Plan. We advise that you take note of any relevant policies within the South East Marine Plan documents in regard to areas within the Supplementary Planning Documents that may impact upon the marine environment. We recommend inclusion of the South East Marine Plan when discussing any themes with tidal or marine elements which extend up to Teddington Lock. Our policies can be referred to as a guide, demonstrating your regard to the marine plans, under the Marine and Coastal Access Act, 2009. It is important to note that marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach.	Comment noted.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	Please let me know if you have any questions regarding implementation of the marine plan.		
Newmark on behalf of CPA	CPA REPRESENTATIONS TO THE AIR QUALITY SPD 1. New Air Quality Damage Costs The proposed Air Quality Damage Cost set out in the draft Air Quality SPD would apply to the replacement of a combustion plant, which the CPA understands includes standby generators, with contributions in the region of £20,000–£80,000 based on emission rates. However, emergency standby generators serve a fundamentally different purpose from operational combustion equipment, they are legally mandated to provide life-safety and business-critical resilience for systems such as emergency lighting, fire pumps and essential medical infrastructure. Their operation is limited to infrequent testing and genuine power-failure events, meaning they do not contribute to routine emissions. As such, applying the full Air Quality Damage Cost to equipment that cannot be removed, substituted or avoided would be disproportionate and would not achieve the policy objective of influencing design choices. An explicit exemption for emergency-only standby generators is therefore necessary to ensure the SPD remains reasonable, justified and aligned with statutory safety requirements. In addition, the CPA would welcome further clarification on whether the damage cost contributions will be ring fenced to provide additional air quality mitigation measures in the City.	Secondary (or standby/emergency) power supplies for safety purposes are required for particular types of development where loss of power would present a serious risk to life, health, or critical operations. Examples include large commercial buildings, high rise residential, hotels and hospitals. The secondary supply can include an alternative mains supply, a battery or generator. The SPD directs developers to consider the cleanest option. Through the application of air pollution damage costs, developers are	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		encouraged to use the cleanest technology and operate the plant to minimise emissions. The SPD does not say that diesel generators are not allowed, though if they are installed damage costs would be applied to reflect the cost to society, largely the impact on health. If done carefully, the damage costs of a diesel generator used for life safety will be minimal. The damage cost contributions will be used to support the delivery of the City of Air Quality Strategy focussing on measures to improve air quality in the Square Mile.	

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
Local stakeholder	I support this SPD.	The support is welcome	No change made.
Natural England	Dear Sir or Madam Air Quality Supplementary Planning Document for the City of London Thank you for your consultation request on the above dated and received by Natural England on 16th March 2026. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geo-diversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again. Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. Please send all planning consultations electronically to the consultation hub at	Comment noted.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	consultations@naturalengland.org.uk		
Air Quality Consultants	The concept of "better by design" was embedded into the EPUK/IAQM guidance. AQ issues need to be considered at the outset of a project to influence design.	Comment noted.	No change made.
Air Quality Consultants	The only issue to bear in mind is that damage costs are in no way directly linked to the costs of abating the excess emissions. Where damage costs are applied, they should be focused towards the application site as far as practicable	Damage costs are designed to reflect the monetary cost of air pollution to society. The value will be specific to an application, and the mitigation will be focussed in the area around the application site as far as is reasonably practicable. However, emissions of pollutants, particularly PM2.5, readily disperse and affect air quality across the whole of the Square Mile.	No change made.
Air Quality Consultants	The proposed limits for gas fired CHP seem quite high – a report that AQC prepared for the CoL indicted that 25mg/m3 is achievable for CHP with SCR, and was used to inform GLAs revised AQN guidance	The emission limits for CHP have been amended.	The CHP emission limits have been updated, reduced to the following: 50 mg/Nm3 for CHP

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
			≤ 500kWe 25 mg/Nm3 for CHP ≥ 500KWe Emission limits are at 5% oxygen.
Air Quality Consultants	The screening criteria for AADT flows are being investigated in the revised IAQM guidance – these flows are likely to be very stringent as they were derived from fleets dominated by Euro5 diesels.	Comment noted.	No change made.
Air Quality Consultants	Noted that the (damage cost) calculation is different from that in the GLA AQN guidance. Clarification on how these two calculations interface would be useful.	The document text has been amended.	Text updated to: As detailed in the City Plan 2040, all developments in the Square Mile are required to be 'Air Quality Neutral' (AQN), as defined by the Mayor of London AQN London Plan Guidance (LPG). The requirements of this SPD surpass the scope of AQN. Where AQN exclusions are

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
			applicable to an application, only a short statement to confirm the development is AQN is required. In the event either of the Building Emissions Benchmarks or Transport Emissions Benchmarks are exceeded the Air Quality Team should be contacted. A development will not be subject to offsetting via AQN, only through the City of London methodology for air pollution damage costs.
Air Quality Consultants	Will the information be available to do a damage cost calculation - For outline applications possibly not – but can be picked up at Reserved Matters Application?	Where the information to complete a damage cost calculation is not	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		available, such as for an outline application, a s106 agreement will be established whereby the AQ damage cost can be confirmed at a later date. The payment of air pollution offsetting will be required on completion of the development and prior to occupation.	
Port of London Authority	Does the CoL Air Quality Team intend to report income generated from damage costs, and where they have been directed, in air quality status reports or other reporting method?	An annual report will be produced detailing income generated from damage costs and where the money has been directed.	No change made.
Port of London Authority	For the CoL Air Quality Team's awareness, as part of the Port of London Authority planning application process for permanent river works licenses* we require applicants to complete a Green Technologies report which should detail efficient technologies considered and to be implemented in design of the works. This should not have any material implications to the requirements of this SPD.	Comment noted.	No change made.
London Borough of Newham	Excellent. Clear and logical framework for reducing air pollution impacts from new development. Each stage reinforces the others and encourages developers to prioritise meaningful emission reductions rather than relying solely on mitigation or	The support for the mitigation hierarchy is welcome.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	financial offsetting. It is far more effective to prevent emissions through design than to manage them later.		
London Borough of Newham	Strongly agree (with the application of air pollution damage costs), provided it is used transparently, consistently, and always as the final step in the hierarchy after all reasonable emission-reduction and mitigation measures have been applied.	The support for damage costs is welcome.	No change made.
London Borough of Newham	Applying air pollution damage costs to (items listed) in major developments is an effective and justified approach. It encourages cleaner design choices, promotes consistency in decision-making, and supports the City's long-term ambition to meet WHO Guidelines	The support for applying damage costs as detailed in the SPD is welcome.	No change made.
London Borough of Newham	The four categories (for allocation of S106 money received) are well-considered and collectively provide a balanced, strategic framework for reinvesting damage-cost funds. They ensure that money is directed not only toward reducing emissions but also toward protecting public health, improving environmental infrastructure, and supporting continuous learning and innovation.	The support for the allocation of money generated from Air Pollution Damage Costs is welcome.	No change made.
London Borough of Newham	The only other category worth considering could be – education. Or renaming the last one to: Research and Education.	Categories have been reviewed.	'Education' has been added to the 'Research' category
London Borough of Newham	The only issue I see here would be enforcement. How are you going to monitor compliance? (re life safety v business continuity generators)	Where a building operates a backup generator, the operator will be required to submit an annual testing report via a planning condition. This will be assessed against the application information.	No change made.
London Borough of Newham	Overall, if applicants submit a comprehensive and detailed Air Quality Assessment, the necessary data (for calculating damage costs) should be available at the	Where the information to complete a damage	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	planning stage. However, some applications may require clarification or additional detail before calculations can be accurately completed.	cost calculation is not available, such as for an outline application, a s106 agreement will be established whereby the AQ damage cost can be confirmed at a later date. The payment of air pollution offsetting will be required upon completion of the development and prior to occupation.	
London Borough of Newham	Given the City's aim to phase out combustion where possible, it may be helpful to explicitly state the circumstances in which combustion plants might still be considered acceptable, and what evidence would be required to justify it.	The SPD aims to discourage combustion plant. Air pollution damage costs are only applied to emissions, where combustion plant cannot be avoided.	No change made.
London Borough of Newham	Clear reporting on how S106 air pollution damage-cost funds could be allocated would support transparency and demonstrate the real-world impact of the policy. Annual summaries or case studies?	An annual report will be produced detailing income generated from damage costs and where the money has been directed.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
London Borough of Newham	Highlighting how cumulative emissions from multiple developments in close proximity are assessed could help address concerns about combined localised impacts, particularly in dense areas.	The assessment of cumulative operational impacts has been reviewed and amended.	Added text to Section 5 'The approach detailed in this SPD removes the requirement for cumulative assessment from most development. All developments will be required to remove all operational emissions, or reduce them as far as is reasonably practicable.' Added sentence to Section 5 'All relevant pollution sources, both existing and consented, should be included in the model.' Removed sentence in Section 5.2 table

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
			Chapter 1 'Details of any consented developments in the locality that may lead to a cumulative impact upon air quality.'
Environment Agency	I like the approach that gives industry the options to be able to comply at each level-, screening the most of emissions and exposure through the first stage, applying measures of mitigation to the second stage and then lastly, any not caught by the first two can be used to create funds for projects to 'offset' the impact of the project.	The support for the approach is welcome.	No change made.
Environment Agency	It seems proportionate and a deterrent, which should hopefully see an increase in the use of the first two stages. So long as the money is used effectively to provide meaningful projects to offset the emissions of the project, where it can be implemented as locally as possible to that project also.	The support for the approach is welcome. Mitigation will be focussed in the area around the application site as far as is reasonably practicable. However, emissions of pollutants, particularly PM2.5, readily disperse and affect air quality across the whole of the Square Mile.	No change made.
Environment Agency	Combustion plant and back up power supply are emerging and very popular sources of emissions from development and ongoing use in that development. It is rightful	The support is welcome.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	that they should be discouraged and or have restrictions on their use and testing regimes to minimise emissions whilst still providing the minimal amount of testing to ensure the operational efficacy of that plant, and with the added inclusion of the emergency life-saving clarification is helpful. Vehicular emissions from transport and the DSP is also rightfully included. The approach seems proportionate.	Comments noted about the approach being proportionate.	
Environment Agency	In the way that they are listed (how and S106 offset payment would be spent), are they listed in a priority way? I think a couple of sentences here would be useful to the document user to see how the money could be spent/ describing a project with a brief example perhaps, as the majority of this section is focused on 'couping' the money and rationale behind why, but little is said on how it could be spent. I think some more transparency around this, such as what transport projects (given that the transport network was previously described as the highest level possible) could be feasible.	An annual report will be produced detailing income generated from damage costs and where the money has been directed.	No change made.
Environment Agency	I like the inclusion of the testing requirements firstly, but how will this be secured- i.e., will it have a section 106 to secure such ongoing use, or will the planning permissions be enough to regulate this? With regards the emission rates, as a regulator of MCP I am familiar with them and encourage the use of them.	Where a building operates a backup generator, the operator will be required to submit an annual testing report via a planning condition.	No change made.
Environment Agency	I am a big fan of this distinction (life safety v business continuity) and it is much needed to secure practical use and application of the principle as this can often be a point where grey areas are and unnecessary emissions created, however, what I believe the document doesn't do is define any different use between the two- this can include run times, testing times, emissions/ standard difference, or fuel difference (maybe there isn't a difference- maybe ALL liquid fuelled generators MUST hit the previous specifications on page 6 regardless of use, and maybe the business continuity use of back up power is absolutely discouraged?).	The emission rates are applicable for all liquid fuelled generators. Where an offsetting calculation is completed for a generator, this will be based on the specific information for each	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		generator. The example calculation provided in Appendix 2 is for a life-safety generator. Where the proposed generator use is for Business Continuity, the Air Quality Team should be consulted to agree assumed hours of operation to be assumed (4 hours assumed for life-safety). This is referenced in the document.	
Environment Agency	The distinction between the two uses is important, but it doesn't tell us how it will be applied or what it means for the developer… I can only see that if you have combustion for business continuity, a further assessment may be required. From this, if this means that ALL business continuity proposals need ongoing assessment and what can be the outcome, will officers making the assessment have good guidance documents to use to make this assessment? In any circumstance, I think the criteria for assessment should form part of public knowledge so that the developer has the options to hand. Edit: I have just remembered/ read that it is most likely to result in offsetting costs on page 10. Perhaps you could introduce the 'penalty' for business continuity earlier in the document on page 6/7 and then reinforce it on page 10 again to make it clearer.	The emission rates are applicable for all liquid fuelled generators. Where an offsetting calculation is completed for a generator, this will be based on the specific information for each generator. The example calculation	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		provided in Appendix 2 is for a life-safety generator. Where the proposed generator use is for Business Continuity the Air Quality Team should be consulted to agree assumed hours of operation to be assumed (4 hours assumed for life-safety).	
Environment Agency	Yes, however I have reservations of the use of the s106 process to capture them. The process itself is sound, however possibly more guidance on how to secure it/ word the s106 would be useful to planning officers. I like the 'when' that is applied to payment- but will the planning officers have appropriate tools for enforcement should the developer go ahead and start to occupy the development prior to payment being made? Is non-major development defined as anything below the definitions on page 13, i.e., lower than ten or more dwellings or lower than >/= 0.5ha?	The Planning Obligations SPD provides guidance on the mechanism through which planning obligations are secured. Enforcement under the Town and Country Planning Act 1990 is applicable in the event of non-payment. Non-major development is anything below the definition of Major Development presented on page 13.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
Environment Agency	I find the second paragraph confusing on page 11. The requirements for developments in the square mile being AQN. The requirements of this SPD go beyond that but it doesn't state that this will become effectively AQPositive? More over, an AQN assessment is not needed unless the transport and building emissions benchmarks are exceeded from the AQN guidance, which effectively is still asking the developer to make an AQN assessment anyway.. only that It doesn't need submitting with the application I am guessing? Perhaps it can be worded better from the start to say that AQN benchmarks for transport and building emissions still have to meet or beat the AQN guidance, but a full AQN assessment does not need to be submitted? I do like the sentence about using AI in the AQIA.	The document text has been reviewed and amended where appropriate.	Text on page 11 updated to: As detailed in the City Plan 2040, all developments in the Square Mile are required to be 'Air Quality Neutral' (AQN), as defined by the Mayor of London AQN London Plan Guidance (LPG). The requirements of this SPD surpass the scope of AQN. Where AQN exclusions are applicable to an application, only a short statement to confirm the development is AQN is required. In the event either

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
			of the Building Emissions Benchmarks or Transport Emissions Benchmarks are exceeded the Air Quality Team should be contacted. A development will not be subject to offsetting via AQN, only through the City of London methodology for air pollution damage costs.
Environment Agency	The modelling criteria is clear and well laid out as is the rationale for exceptions. What isn't clear to me, but I'm not that familiar with modelling, is the AQS aims table. Are those the limits designated for the whole of the square mile, similar to but much more ambitious as the national AQS objectives?, OR, are they the maximum modelling parameters as part of the process contribution from the development that is being applied for?	The limits designated are for the whole of the Square Mile. They are more ambitious than the national targets.	No change made.
Environment Agency	Yes it is a very inclusive list, however I would use the same language used previously in the report where possible, for example, 7, offset calculation; required: building plant emissions, where on page 10 we used the language any on site combustion plant (boilers….., and also any on site generators proposed for business continuity….	The document text has been amended.	Updated text from 'Building ' to 'Operational combustion'.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	i am aware that the phrase 'building plant emissions' does cover both of these, but I think it might help if the same phrasing was used to remove confusion/ abuse.		
Environment Agency	First note- paragraph one, earlier in the document it states that offset damage costing was not applied to demolition and construction, whereas in this section it only states construction. To avoid confusion you should keep the phrasing the same and possibly use the term construction and demolition as it is normally used (rather than the other way around!).	The document text has been amended.	Text updated at the start of the document to: 'construction (which includes construction, deconstruction and demolition)'
Environment Agency	Second note, this will be the section which will be the most confusing and most abused. Clarity is key!	Comment noted.	No change made.
Environment Agency	DC: it is not explained how you get this information. I presume this is the information previously mentioned on page 10 developed by DEFRA? Does this information have a policy number, a document number, a defining identifying mark associated with it (i.e., 2025 damage report?)? You should include this to remove ambiguity in case there could be a misleading source or year used? (is it a requirement of the AQIA to submit which damage report was used? I understand you probably cannot directly link the guidance/ document as it may be updated annually and will change, but you could find a way to refer to the report and subsequent reports thereafter appropriate for the year of application. I think 'source sector' needs a footnote/ further expansion to explain what/ where/ how it is identified, to prevent abuse.	The most recent Defra Air Pollution Damage Costs document is referenced in the SPD, footnote 5. The source sector is defined in the Defra damage cost document.	No change made.
Environment Agency	One thing I have noticed is, with the two given examples of diesel generator use, the life safety one is significantly more expensive of a payment than the discouraged business continuity one, for the same runtime- is this 'weighted' correctly? You will see a lot more applications with business continuity generators in place rather than life saving reasons, with appropriate justification to save money! Doesn't this	It is an emission-based cost, regardless of use, and there is a distinction in terms of cost between	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	encourage more use in business continuity and more testing hours/ more emissions, and consequently punish life safety critical users? Edit: I have just read the reason why underneath, apologies but rather than delete my earlier thoughts, I will leave them in situ as I'm sure many more will go through the same journey that I have and it might provide a user problem in the future. But on that note, is there any difference in the offset payments depending on the distinction of generator use? Would an identical life saving generator cost the same as a business continuity one, and the difference would come down to the ability to be able to have it in the first place, i.e., life saving ones are given priority over business continuity ones which are discouraged. Actually, thinking about it, there should be no difference in the use of the generator as this exercise is an emissions based cost- regardless of use, so there would be no difference in identical machines. Again, I could remove this comment, but it has been left to show you my thought process and considerations in case you receive more comments like this and decide to make it clearer in the document.	Life-Safety and Business Continuity.	
Cross River Partnership	The SPD sets out a clear three-stage approach to minimising emissions of air pollution from new development with a clear priority for development in the City of London to minimise emissions of the pollutants nitrogen oxides (NOx) and particulate matter (PM10 and PM2.5) and have zero operational emissions. It is clear that developments should be designed to reduce exposure of the occupiers and nearby populations to air pollution as a first priority. CRP would emphasise the need to ensure that developments are considering all potential air pollution mitigations before incurring air pollution damage costs and that this is not viewed as the default option for developers. CRP's view on offsetting residual emissions via damage costs is outlined in the following question responses	Comment noted.	No change made.
Cross River Partnership	CRP welcomes the principle of applying air pollution damage costs to emissions of air pollution and the City Corporation's proactive approach to addressing the societal impacts of emissions on human health, productivity, wellbeing and the	Comment noted.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	environment. CRP would emphasise the need to ensure that developments are considering all potential air pollution mitigations before incurring air pollution damage costs. CRP has direct experience of delivering projects funded through offset funding. An example is the Westminster City Council Westminster Climate Fund (WCF), a grant funding programme that utilises S106 carbon offset payments to support the decarbonisation of Westminster. CRP have used WCF funding to deliver collaborative projects that reduce emissions in Westminster, including supporting sustainable logistics and the Sustainable City Charter Innovation Challenge. The Innovation Challenge is designed to support Sustainable City Charter signatories and local innovators and will identify local SMEs with low carbon solutions and products and match them with signatories to trial these in real-world commercial settings. The aim of the Challenge is to reduce signatories' emissions, as well as drive the growth of the low carbon industry across the borough. CRP would encourage the City Corporation to consider funding a diverse range of innovative air pollution improvement projects through the offsetting costs as well as using it as an opportunity to involve and engage local organisations with the subject of air quality and urban health. CRP were involved in the governance refresh of the Westminster Climate Fund, providing guidance around potential project deliver and partnerships, and would be happy to provide any input to the City Corporation if this would be of value.	The SPD does ensure that developers consider all potential air pollution mitigations before incurring air pollution damage costs.	
Cross River Partnership	CRP has delivered multiple DEFRA and Mayor's Air Quality Fund-funded programmes focused on minimising the impact of freight on noise, air quality, traffic and pavement space in London as well as addressing the issue of over-dependence on private vehicles and increasing active travel.	Comment noted.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	Examples include Smarter Greener Logistics, Clean Air Logistics for London, Healthy Streets Every I & II, and JUST STREETS. Therefore CRP particularly welcomes the application of offsetting costs to any increase in emissions associated with vehicle movement, when compared to the current land use, in major applications. CRP also notes the key action to commit to using zero tailpipe emission vehicles where possible. CRP would encourage the City Corporation to consider the role that the Thames and river freight can play in reducing emissions from delivery and servicing. CRP have delivered a number of river freight trials, including the London Light Freight River Trial and River Freight Pilot Part Two, that have highlighted the potential to incorporate river freight into low emission logistics operations.		
Cross River Partnership	The SPD clearly presents four categories for allocation of any money received by S106 as air pollution damage costs. The categories have clear alignment to the goal of improving air pollution and allow for a range of air pollution improvement projects to be delivered. CRP would recommend for the category of 'Improving Public Health' to be reconsidered as a stand-alone category and instead incorporated as an essential focus of all categories to ensure that public health remains central to any project delivery. CRP would ask the City Corporation to consider a category focused on the delivering community projects that empower local community groups with the subject of air quality and encourage collaboration, co-design and local ownership. From CRP's experience of the Westminster Climate Fund, we would also ask the City Corporation to consider including feasibility studies within either the Infrastructure or Research category (should funding be externally available) to allow organisations to explore potential project delivery specific to their air quality requirements. CRP would welcome additional information on the types and scale of air pollution improvement projects the City Corporation envisage delivering in the Square Mile and if there will be opportunities for partnership organisations to be involved.	Community projects would be captured by the public health category. Feasibility studies would be part of the infrastructure and transport and public realm categories.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
Cross River Partnership	CRP does not have specific expertise on generators emission limits, however, agrees with the need to consult with the City Corporation's Air Quality Team should limits outlined not be achieved.	Comment noted	No change made.
Cross River Partnership	CRP agrees with the definitions for Emergency Life Safety and Business Continuity generators.	Comment noted	No change made.
Cross River Partnership	The SPD provides a clear high-level overview of the offsetting process, however, additional detail around the governance and workings of the fund would be welcome. From a partnership perspective, CRP would welcome additional information on the types of air pollution improvement projects the City Corporation envisage delivering in the Square Mile and if there will be opportunities for external / partnership organisations to be involved in project delivery.	An annual report will be produced detailing income generated from damage costs and where the money has been directed.	No change made.
Cross River Partnership	CRP welcomes the requirement for applicants to demonstrate that any major development complies with the requirements of the Air Quality SPD by submitting an Air Quality Impact Assessment (AQIA). The demonstrates a clear commitment to achieving the best possible outcomes for air quality in the City. CRP does not have any specific comments on the modelling criteria from a developer perspective, however, welcomes the clear links to the City Corporation's Air Quality Strategy aims for maximum levels of exposure for NO2, PM10 and PM2.5. Providing a structure for AQIA submission and information required is helpful for developers to ensure it is as easy as possible to comply with the City Corporation exposure limits and generate positive action.	The support for the Air Quality Impact Assessment process is welcome.	No change made.
Cross River Partnership	The requirements of an Air Quality Impact Assessment as clearly outlined on page 12 and CRP recognise that the specific requirements as dependent on the type and scale of the development as stated in the SPD. CRP particularly welcomes the reference to Green Infrastructure (GI) within the 'Design Considerations: Exposure' chapter. CRP deliver a range of placemaking projects through programmes such as Healthy Streets Everyday II and JUST STREETS, that incorporate GI to function as a	The support for the reference to Green Infrastructure is welcome.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	porous vegetation barrier, altering local air dispersion patterns, and providing a greater surface area for increased deposition. CRP would also emphasise the co-benefits of GI for reducing air temperatures, provide shade and shelter, and encourage people to choose to walk, cycle, wheel or scoot through improving the public realm.		
Cross River Partnership	CRP welcomes the City of London's commitment to air quality evident in the Air Quality SPD and ambition to deliver air quality that is better than national standards, as outlined in the City Corporation Air Quality Strategy 2025 to 2032. CRP have firsthand experience of delivering air quality focused projects and value the City Corporation's priority on emphasising the need for Air Quality Neutral and Air Quality Positive developments and major schemes to be the default and for offsetting to only be used in unavoidable circumstances. CRP would emphasise the need to focus on the area beyond the building footprint and building operations for addressing the issue of air pollution in particular through urban greening and low emission transport and freight and servicing approaches. As a partnership supporting public, private and community organisations the opportunity to involve community groups in the topic of air quality and benefits to local population and visitor health should not be underestimated.	The support for the ongoing commitment to improving air quality is welcome.	No change made.
City and Hackney Public Health	The mitigation hierarchy (avoid, mitigate, compensate) represents a clear shift toward outcome-focused, health-protective planning and reflects best practice nationally. The requirement for major developments to aim for zero emissions wherever feasible is particularly welcome, given the burden of air pollution on cardiovascular, respiratory and developmental health, and its interaction with health inequalities. The application of Defra air pollution damage costs provides an important	The support for the overarching aims of the SPD is welcome.	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	mechanism to recognise and address residual health harms, while reinforcing the polluter-pays principle.		
City and Hackney Public Health	The SPD would benefit from stronger and more explicit reference to exposure reduction for vulnerable groups, including children, older people, pregnant women, and those with existing respiratory or cardiovascular conditions. In particular, Public Health supports strengthened attention to schools, childcare settings, healthcare facilities, and care homes, alongside residential developments, where exposure reduction delivers disproportionate health benefits.	Exposure reduction is a key aspect of the design and assessment requirements. All vulnerable groups would be taken into account. The health impacts of air pollution, including vulnerable groups, are detailed in the City Corporation Air Quality Strategy 2025-2030.	No change made.
City and Hackney Public Health	Public Health recommends that Air Quality Impact Assessments, in line with the SPD's Structure of an Air Quality Impact Assessment Report, include a brief health-focused summary within the assessment of impacts and residual effects. This could describe the health relevance of predicted exposures, with explicit consideration of vulnerable groups and sensitive receptors, supporting a "Health in All Policies" approach.	The document text has been amended.	Added text to the table on page 12: 'A summary describing the health impact of the predicted exposure'.
City and Hackney Public Health	Public Health also supports the use of consistent, health-relevant indicators over time to help understand how planning-led air quality improvements contribute to longer-term population health outcomes. Examples of health-relevant indicators could include trends in PM2.5 and NO2 concentrations, exposure at sensitive locations such as schools, residential areas and healthcare settings (including St	These comments are captured by the wider work undertaken to mitigate the impact of air pollution on health. as	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	Bartholomew's Hospital), and selected respiratory or cardiovascular hospital admissions during high-pollution periods	detailed in the City Corporation Air Quality Strategy.	
City and Hackney Public Health	UK evidence shows that short-term exposure to air pollution increases daily mortality and emergency hospital admissions for respiratory and cardiovascular conditions, with no safe threshold identified for particulate matter (Chief Medical Officer's Annual Report, 2022) Public Health therefore encourages closer alignment between planning policy, local alert systems (e.g. airTEXT), and NHS and community responses during high-pollution episodes, to ensure developments do not exacerbate acute exposure risks	Exposure reduction is a key aspect of the design and assessment requirements. All vulnerable groups would be taken into account. The outcome of the SPD is to reduce air pollutant emissions from operational buildings across the Square Mile. The s106 categories for air quality offsetting include improving public health and education. The SPD directs building occupiers to not test generators in light wind conditions and when pollution levels are moderate and above. This is to avoid increasing local levels of pollution and ensuring that any	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
		emissions are widely dispersed. The City Corporation supports air TEXT and the GLA air pollution warning system in addition to providing hyper-local air pollution data through our monitoring websites.	
City and Hackney Public Health	There is an opportunity for the SPD to explicitly recognise smokefree environments as a complementary measure to reduce exposure to harmful particulate pollution in public and shared spaces. Tobacco smoke is a source of PM2.5 with no safe level of exposure, and design-led approaches that support smokefree environments—particularly around schools, healthcare settings and residential spaces—can contribute to exposure reduction and health equity objectives alongside wider air quality measures. This aligns with the priorities of the City and Hackney Tobacco Control Alliance, which is focused on reducing smoking prevalence, protecting people from second-hand smoke, and addressing health inequalities.	City Corporation Street Environment Officers enforce smoking bans where smoking is strictly prohibited. There is a separate indoor air quality work programme which includes AirAware. This is outside of the scope of the SPD.	No change made.
City and Hackney Public Health	Where the SPD references indoor air quality, Public Health encourages consideration of how IAQ measures secured through planning are supported in practice. This includes through the inclusion of locally delivered air quality information programmes, such as Air Aware. This would help reinforce consistent messaging on ventilation, avoidance of indoor pollution sources, and exposure	There is a separate indoor air quality work programme which includes AirAware. This is	No change made.

Appendix 1a

Organisation	Comment	Response	Changes to the Air Quality SPD
	reduction, particularly in high-occupancy or sensitive uses, while also ensuring public information complements planning-led mitigation.	outside of the scope of the SPD.	
City and Hackney Public Health	Public Health encourages clarity on how air quality damage costs secured through the SPD will be prioritised and applied, noting the value of directing these funds toward interventions with demonstrable health benefit. This could include measures that reduce exposure in high-risk locations and sensitive settings, as well as green infrastructure that delivers both air quality and wider health co-benefits.	An annual report will be produced detailing income generated from damage costs and where the money has been directed.	No change made.
City and Hackney Public Health	Public Health recommends the inclusion of locally delivered air quality information programmes, such as Air Aware, as a means of complementing planning-led mitigation and supporting consistent messaging on exposure reduction	The Air Aware platform was developed jointly by the City Corporation and is used locally	No change made.