

**The Town and Country Planning
(Local Planning) (England) Regulations 2012**

City of London



**Air Quality
Supplementary Planning Document
Adoption Statement**

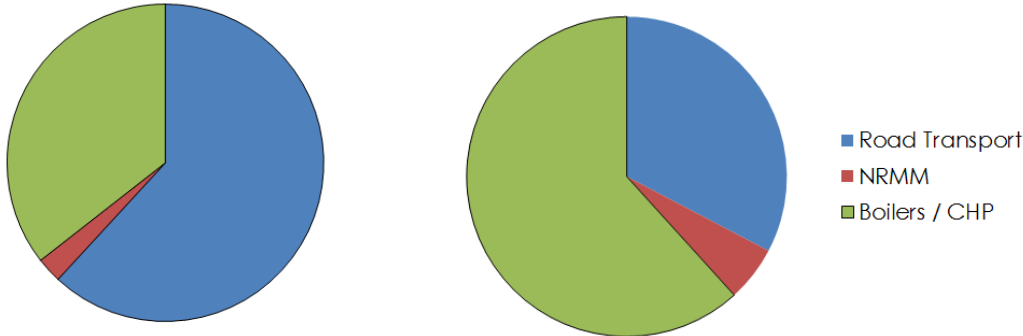
July 2017

1. This adoption statement is published to meet the requirements of Regulation 14 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
2. The City of London City Air Quality (SPD) was adopted on XXXXX 2017.
3. The appendix to this statement sets out the modifications made to the SPD to take account of representations during the consultation period and other relevant matters.
4. Any person with sufficient interest in the decision to adopt the SPD may apply to the High Court for permission to apply for judicial review of that decision.
5. Any such application must be made promptly and, in any event, not later than 3 months after the date on which the SPD was adopted (XXXX 2017).
6. Copies of the SPD, the statement of consultation and the adoption statement are available on request at the Department of the Built Environment enquiries desk, North Wing, Guildhall, London EC2V 5DH. These documents can also be viewed on the City of London website accessed via:
www.cityoflondon.gov.uk/airqualityplanning

Schedule of changes to City Public Realm Supplementary Planning Document, June 2017

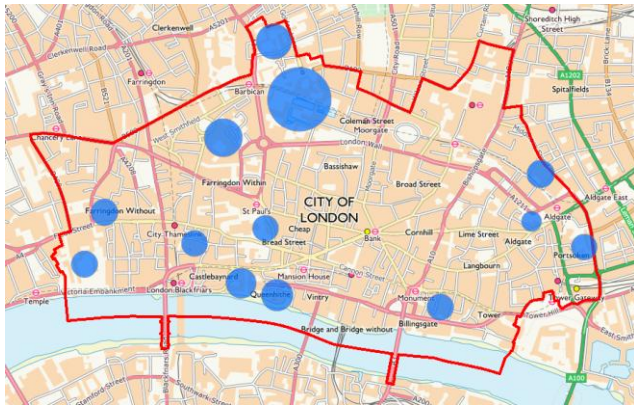
Page	Paragraph	Details	Reason for Change			
7	Figure 1	<p>Figure 1: Summary of SPD Requirements and Planning Submission Stage</p> <table><tr><td><u>SPD Requirements</u></td><td>Planning Application Requirements</td><td><u>Pre-Commencement/ Occupation details (where conditioned)</u></td></tr></table>	<u>SPD Requirements</u>	Planning Application Requirements	<u>Pre-Commencement/ Occupation details (where conditioned)</u>	Text deleted and inserted for clarity.
<u>SPD Requirements</u>	Planning Application Requirements	<u>Pre-Commencement/ Occupation details (where conditioned)</u>				
7	Figure 1 section 3	<p>Combustion plant:</p> <ul style="list-style-type: none">✓ Install low/ultra-low NOx boilers✓ Biomass/<u>biofuel</u> plant discouraged✓ Meet CHP and biomass NOx and PM emission standards	Text inserted to align with Policy DM15.6 wording and text deleted as conflicting with main text.			
8	Figure 1 section 3	<p>Combustion Flues:</p> <ul style="list-style-type: none">✓ at least 1m above roof level✓ 3m above general access areas / amenity space (where the Clean Air Act applies)✓ <u>In accordance with approved Air Quality Impact Assessment</u>	Text inserted to link with text			
8	Figure 1 Section 4	<p>Insert:</p> <ul style="list-style-type: none">✓ <u>CLP in line with TfL Best Practice</u>	Text amended as per consultation response ref: 9/2			
8	Figure 1 Section 4	Where <u>an</u> Air Quality Impact Assessment <u>is</u> submitted at application stage, include <u>a risk assessment</u> and sensitive receptors and methods to minimise air quality impact.	Text inserted to link with paragraph 3.5.4(a)			
8	Figure 1 Section 4	<p>Air Quality Neutral Assessment <i>(or Air Quality Positive as policy emerges)</i> required when the floor space is 1,000m² or more or 10 or more residential dwellings:</p> <ul style="list-style-type: none">✓ Building emissions✓ Transport emissions	Insert text following Natural England comment ref: 1/4			

8	Figure 1 Section 5	<p>Detailed Air Quality Impact Assessment for major developments when it:</p> <ul style="list-style-type: none"> ✓ is within 50m of sensitive use (<u>see figure 4</u>) ✗ creates a significant change in traffic (see explanation) ✓ requires an EIA ✓ involves the Environmental Permitting Regulations ✗ exposes sensitive or a high number of people to air pollution (schools hospitals and >75 residential properties) ✓ creates exposure for long periods of the day (e.g. adjacent to busy roads) <p>For all developments with:</p> <ul style="list-style-type: none"> ✓ exposes sensitive or a high number of people to air pollution (schools hospitals and >75 residential properties) ✓ creates exposure for long periods of the day (e.g. adjacent to busy roads) ✓ <u>CHP, biomass or biofuel plant.</u> <p>Detailed Air Quality Impact Assessment:</p> <ul style="list-style-type: none"> ✗ Biomass proposed or <50kWth input CHP not meeting the NOx emission standard 	Text deleted, inserted and moved as per consultation response ref 3/4. Text also inserted for clarity. Text moved to ensure assessments conducted for all relevant sites.
9	2.2.3	<p>The Local Plan Core Strategic Policy CS16 (4) V requires developers to demonstrate how the environmental impacts (together with road danger and servicing) will be minimised by submitting the following <u>plans and assessments</u> as part of the planning application process (where applicable); <u>there should also be a consideration of using low emission river transport (where applicable)</u>. See Appendix B for guidance relating to:.....</p>	Text and links inserted as per consultation responses ref: 9/1, 9/3 and 9/4
10	2.3.2	<p>Nitrogen dioxide levels decrease with increasing distance from the edge of the road and with height. Background levels of nitrogen dioxide are improving.</p>	Text deleted as may be misleading or become out of date

11/12	2.3.7	<p>Green Roofs, Walls and Planting:</p> <p>As well as increasing biodiversity, plants can play a role in trapping fine particles (PM₁₀ and PM_{2.5}) found in the air we breathe. Research by Imperial College London has indicates that plants with small leaves (which disrupt the flow of air) and fine hairs on their surface work best; however, leaves which cover a large surface or are grooved also provide surfaces upon which particles can be trapped. The Imperial College London report provides guidance on See Appendix B for more information and the types of plants additional <u>research</u>, guidance and green roofs and walls case studies.</p>	Delete and insert text to refer to emerging research and case studies in Appendix B , as per comment: ref 6/9
13	3.1.2	<p><u>3.1.2 It should be noted that the main source of NOx in the City is currently road transport. However, there is a predicted shift by 2020 to boilers and CHP generating a greater proportion of NOx (see figure 3). Zero and low NOx technology is therefore strongly encouraged.</u></p> <p><u>Figure 3 Anticipated changes in the source of NOx in the City of London (source: London Atmospheric Emission's Inventory 2013)</u></p>  <p style="text-align: center;">2013 2020</p>	Figure and text inserted to emphasise future contribution of combustion plant to NOx levels.

14	3.2.3 (new)	It is acknowledged that the GLA energy hierarchy policies may change with the development of London Environment Strategy and the new London Plan. Developers should have regard to the emerging policies at the time of application.	Inserted text following GLA comment ref: 3/3
14	3.2.3 (old)	3.2.3 See section 3.4 for information relating to biomass and CHP selection and emissions.	Deleted, not required
14	3.3	3.3 Gas Boilers	Inserted for clarity
14/15	3.4 / 3.4.1	<u>Biomass or Biofuel Boilers and CHP</u> 3.4.1 When sited and specified appropriately in accordance with the energy demands of the building, CHP systems and biomass <u>or biofuel</u> boilers can have benefits in terms of carbon emissions. However, they <u>can</u> usually give rise to significantly higher emissions of NOx and/or PM ₁₀ emissions than regular gas boilers, and developers should ensure that the emission standards set in the Mayor's SDC SPG are not exceeded. The SDC SPG does not currently provide guidance where plant is <50kWth input. The City would expect all <u>such</u> plant to meet a NOx emission limit of <50mgNm ³ at 5% O ₂ (dry gas) <u>as a minimum</u> .	Amended for clarity and in line with wording in Local Plan Policy DM15.6.
15	3.4.4	Where CHP, <50kWth input (i.e. those not covered by the SDC SPG NOx emission limit) or biomass <u>or biofuel</u> boilers are proposed, plant emissions must be evaluated as part of a detailed Air Quality Impact Assessment (see Section 5). and Where permitted, the appliance will be required to meet high standards of air pollution control, with particular emphasis on: <ul style="list-style-type: none"> • boiler plant design and operation; • pollution abatement equipment;..... 	Update text following GLA comment ref: 3/4 and wording in Local Plan Policy DM15.6.
15	3.4.5	Prior to CHP, biomass <u>or biofuel</u> plant coming into operation the following details must be submitted to and approved in writing by the Local Planning Authority; <u>this will be conditioned within the planning consent</u> :	Update text following GLA comment ref: 3/6 and wording in Local Plan Policy DM15.6.

		<ul style="list-style-type: none"> The results of an emissions test demonstrating compliance with the emission and efflux velocity requirements of the SDC SPG..... 	
16	3.6.1must terminate as a minimum at least 1 metre above the highest point of the building of which the plant serves, <u>or as specified by the approved Air Quality Impact Assessment</u> , unless agreed with the City Corporation. With regard to this requirement,.....	Inserted text to link with purpose of Air Quality Impact Assessments
18	4.5.4	The AQDMP submitted should provide a commitment to adhering to this policy, <u>or any update thereof</u> .	Inserted text to ensure document does not become out of date
19	5.2.2 (new)	<u>It is acknowledged that there is an emerging policy relating to developments being air quality 'positive' rather than air quality 'neutral' and Developers should have regard to this new guidance if it is available at the time of application.</u>	Insert text following Natural England comment ref: 1/4
20	5.3.2	<p>A <u>detailed</u> Air Quality Impact Assessment must be submitted at the application stage for major developments which:</p> <p>(a) are in close proximity to a sensitive land use. This includes developments within 50m of the locations shown in figure 4 overleaf (<i>including large residential areas - <u>as detailed in the Local Plan</u>, schools, nurseries and St Bartholomew's Hospital</i>)</p> <p>(b) create a significant change in traffic. In developments that introduce, or increase car parking facilities by 100 spaces or more, or with the potential to significantly change road traffic on any road exceeding 10,000 vehicles per day. Significant changes include:</p> <ul style="list-style-type: none"> – increase in traffic volumes > 5% (Annual Average Daily Traffic (AADT) – or peak); – lower average vehicle speed or significant increase in congestion; – significant increase in the percentage of HGVs; <p>(c) expose sensitive or a high number of people to air pollution: This includes schools, hospitals and developments with more than 75 homes; or where people will be exposed to poor air quality for significant periods of the</p>	<p>Text inserted for clarity.</p> <p>Text moved to ensure assessments conducted for all relevant sites.</p> <p>Update text following GLA comment ref: 3/4 and wording in Local Plan Policy DM15.6.</p>

		<p>day, in particular developments located on busy roads where exceedences of the air quality objectives are seen (see figure 2 in Section 2).</p> <p>(d) are associated with the Environmental Permitting Regulations</p> <p>(e) developments requiring an Environmental Impact Assessment</p> <p>For all developments which:</p> <p><u>expose sensitive or a high number of people to air pollution:</u> This includes schools, hospitals and developments with more than 75 homes; or where people will be exposed to poor air quality for significant periods of the day, in particular developments located on busy roads where exceedences of the air quality objectives are seen (see figure 2 in Section 2).</p> <p><u>involve the following energy generation:</u> CHP, biomass or biofuel plant, boilers and biomass or gas CHP less than 50kWth input that do not have a NO_x emission of <50mgNm³ at 5% O₂ and dry gas.</p>	
21	Figure 4	 <p>© Crown copyright and database rights 2017 OS 100023243 see https://www.cityoflondon.gov.uk/maps/Pages/interactive-maps.aspx</p> <p>Figure 4 Location of Sensitive Land Use within which an Air Quality Impact Assessment is required</p>	Insert link, for map and insert new map to align closer with the Local Plan.

21	5.3.3	<p>The scope of an air quality impact assessment is:</p> <ul style="list-style-type: none"> • <u>To assess local air quality pollutants and dust</u> • To assess the current baseline situation in the vicinity of the proposed development; • To predict the future impact in the first year of operation, both with and without the proposed development, but including all consented development, by calculating statistics that can be compared with the air quality objectives. 	Insert text from GLA SPD template document.
22	5.3.4(b)	Sensitive receptors: Sensitive receptors, <u>at relevant heights</u> , that could be affected <u>by the development</u> must be identified as part of the assessment <u>(and shown on a map)</u> .	Update text for clarity
22	5.3.4(e)	<u>Impact and Significance:</u> Standard impact descriptors (for example as detailed in the Institute of Air Quality Management Guidance) should be used to describe the air quality impact of the development on relevant receptors. A professional judgement with regard to the significance of the impact should be provided. However, as detailed in the Association of London Government (ALG) 2006 guidance, the City Corporation will ultimately decide the air quality significance of the development.	All text updated following comments ref: 10/1 and 6/2
22	5.3.5 – 5.3.6	<p>Detailed Air Quality Impact Assessment Dispersion-Modelling Requirements:</p> <p>5.3.5 Where the plant installed includes CHP less than 50kWth input and low NOx technology is not proposed or biomass fuelled plant is planned, a more detailed assessment is required.</p> <p>5.3.5 Dispersion modelling shall be carried out in accordance with Defra's Technical Guidance Note (TG016), <u>appropriate guidance see Appendix B</u>. Due to the complex nature of the City's environment, the type of model selected must <u>be appropriate for a complex urban environment with tall buildings and street canyons</u>. be ADMS Urban or equivalent and in accordance with TG 016.</p>	Text updated and reordered for clarity following comments referenced 3/4, 6/2, 6/4 and 6/6.

		<p>5.3.6 The assessment must specify the <u>model inputs and verification (where appropriate), assumptions made (for example plant operating hours and conditions) and technical details related to the proposed appliance, fuel type, emission concentrations, and maintenance and exhaust stack details.</u></p> <p>5.3.7 The assessment must also include an atmospheric dispersion model to predict a prediction of the current baseline and future PM₁₀, PM_{2.5} and NO_x concentrations. Predictions of future concentrations should be both with and without the proposed development.</p> <p>5.3.6 In addition to the above, the <u>Where proposed plant uses biomass or biofuel, the</u> detailed Air Quality Impact Assessment shall also compare the impact of emissions from the <u>proposed</u> biomass boiler/CHP and a gas boiler/CHP of identical thermal rating.</p>	
26	Appendix A	<p><u>Detailed</u> Air Quality Impact Assessment:</p> <p>Major developments when it:</p> <ul style="list-style-type: none"> • is within 50m of sensitive use • creates a significant change in traffic (see explanation) • exposes sensitive or a high number of people to air pollution (schools hospitals and >75 residential properties) • creates exposure for long periods of the day • requires an EIA or involves EPR <p><u>For all</u> developments which:</p> <ul style="list-style-type: none"> • <u>exposes sensitive or a high number of people to air pollution (schools hospitals and >75 residential properties)</u> • <u>creates exposure for long periods of the day</u> • <u>include CHP, biomass or biofuel plant</u> <p>Modelling of Biomass and small CHP (not meeting low NO_x limit)</p> <p>Submit intention for:</p> <ul style="list-style-type: none"> • Low NO_x boilers and NO_x CHP 	Insert and delete text as per comment ref: 3/4 and wording in Local Plan Policy DM15.6. Text moved to ensure assessments conducted for all relevant sites.

		<ul style="list-style-type: none"> • Exclusion of biomass / <u>biofuel</u> • Minimised generator use 	
27/28	Appendix B	Updated and inserted text and links to guidance and case studies. Inserted ' Appendix B : Amendment Log ' to document future changes / additions.	As per comments received to link to main text and in light of emerging guidance. Log inserted to assist with transparency.
29	Appendix C	C2: Supporting Strategies and SPD's The City Corporation has a number of strategies and SPDs which support the implementation of the Local Plan and Air Quality Strategy. These documents can be found on the City of London website. <u>it should be noted that a Freight SPD is being developed at the time of this SPD's publication.</u>	Text inserted as per comment 9/3
39	Appendix E	E2: London <u>Local Air Quality Management</u> (LLAQM) Framework E3: According to the 2013 <u>London Atmospheric Emissions Inventory (LAEI)</u> ,	Text inserted to give full name
44	Appendix H	Web links removed	To stop links becoming outdated