

Air Quality Neutral and Positive Guidance GLA Consultation

February 2022

Question	Comments
Section 1 - Applying Air Quality Neutral	
<p>To what extent do you agree or disagree with the following sentence? Having the Air Quality Neutral guidance will help to improve air quality in London (Choose any one option) (Required) Strongly agree Somewhat agree Neither agree or disagree Strongly disagree Somewhat disagree</p>	<p>Somewhat disagree</p>
<p>Please tell us why you answered the way you did to the previous question?</p>	<p>The guidance could be clearer on what air quality neutral means, not just regarding the benchmarks but about making sure air quality pollution is not made worse by development but it does not improve it. Therefore also highlighting how air quality positive actually contributes to better air quality. What do officers need to look at and interrogate to decide it has been met? What does air quality neutral look like at different development scales?</p> <p>It would be useful to better define the Air Quality Focus Areas in Figure 9.1 of the London Plan or work with the boroughs to define this area so it more closely reflects key roads. In Southwark, for example, Air Quality Focus Areas cover a small proportion of Southwark, the guidance could be extended to cover within 0.5km to include more of the borough. The guidance should be mended to state that the methodology would be to measure from the application site to the nearest Air Quality Focus Area, and if the distance is 500 metres or less, to require the enhanced standard that would apply in the AQFA.</p>

Question	Comments
	Air quality neutral by definition doesn't improve air quality, it just stops it from getting worse due to that particular development.
Section 2 - Building Emissions Benchmark (BEB)	
<p>To what extent do you agree or disagree with the methodology set out for meeting the Building Emissions Benchmarks? (Choose any one option) (Required) Strongly agree Somewhat agree Neither agree or disagree Strongly disagree Somewhat disagree</p>	Somewhat disagree
<p>Please share any comments you have on the Building Emissions Benchmark, including your views about the benchmark emissions rate for particulate matter being set at zero</p>	<p>Is it possible to get PM to 0? Especially if neighbouring boroughs are not achieving the AQ targets and the poor quality air circulates. There is more clarity needed. Particulate matter is not included here.</p> <p>The BEB only includes emissions from energy and heating sources. According to the LAEI, these account for 25% of emissions. However commercial catering sources account for a further 25%. Commercial catering emissions should be included in the scope of BEB, and where development is permitted that doesn't propose catering uses, this should be conditioned so that any future change of use or addition of commercial catering within a permitted use class, will require an application to remove the condition, so that mitigation of emissions can be secured. It is agreed that there should be zero increase in particulate emissions. However, the guidance says in practice this will only prevent new liquid and solid combustion. Gas combustion produces less particulates, but still above zero. If the aim is to keep gas combustion as a permitted source, the threshold will need to be set above zero.</p>
<p>The guidance sets out the methodology for calculating generic predicted building emissions where a combustion source is not known. Please share any</p>	<p>This seems a sensible approach. Methodology should assume worst case scenario where developers have not disclosed the combustion source, or should condition the permissible combustion sources if a more favourable case scenario is used.</p>

Question	Comments
<p>comments you have regarding this process.</p>	
<p>The guidance sets out the process of gathering data on energy usage and emissions rates for combustion sources. Please share any comments you have regarding this process and suggestions for how it can be improved?</p>	<p>Is there a reason heat networks don't have an estimated combustion rate? Heat Pumps are set at 0.</p>
<p>The guidance sets out generic emissions rates for combustion technologies where specific units have not yet been selected. Please share any comments you have regarding the emission rates or how the process can be improved?</p>	<p>Generic combustion rates are crucial for minor development where an Energy statement is not required or where that information is not provided. The same assumptions should be applied for all boroughs.</p>
<p>Section 3 - Transport Emissions Benchmark (TEB)</p>	
<p>To what extent do you agree or disagree with the methodology set out for meeting the Transport Emissions Benchmark? (Choose any one option) (Required) Strongly agree Somewhat agree Neither agree or disagree Strongly disagree</p>	<p>Somewhat agree</p>

Question	Comments
Somewhat disagree	
Do you have any additional comments on the Transport Emissions Benchmark, including the use of TRICS data to calculate the new proposed benchmarks?	<p>How does PTAL ratings impact on air quality emissions? Has this been considered?</p> <p>It is worthwhile noting that the paper considers all car-free developments are assumed to be air quality neutral in the paper, which form a majority of applications received. Para 4.1.5 states that the 'The Transport Emissions Benchmark (TEB) only estimates car or light van trips generated by the development occupiers. These trips are likely to be generated by residents, customers or employees. The TEB does not include trips generated by deliveries and servicing, taxis or heavy vehicle movements from non-occupiers. Assessment of these trips should be captured in the wider air quality impact assessment where one is required.' Therefore we should not be taking that the TEB as the full air quality impact of the development.</p>
If you disagree with the use of TRICS data, please specify what data the Transport Emissions Benchmarks should be based on?	We have considered the methodology proposed within the paper and also run an example and are satisfied that this methodology is satisfactory.
Sections 4 – Calculating benchmarks and the introduction of use Class E	
The BEB and TEB in the guidance are defined for different land uses. To what extent do you agree or disagree with the following sentence? The way the land use categories have been grouped and defined are clear and easy to apply. (Choose any one option) (Required) Strongly agree Somewhat agree	Strongly agree

Question	Comments
<p>Neither agree or disagree Strongly disagree Somewhat disagree</p>	
<p>The new Class E was introduced under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 following the development of the guidance. As a result, separate use classes for commercial uses, including retail and offices, have now been replaced by use Class E. Please comment on whether you think this guidance takes the right approach to calculating the Building Emissions Benchmark for uses within Class E based on the intended and anticipated use of the land under this category?</p>	<p>Supportive of this approach.</p> <p>Takeaways are not listed as a pollution generating use. Information about the proposed emission sources, their predicted annual energy use and their emission rates should be provided in one single document, for ease of assessment, and not dispersed among multiple planning documents.</p> <p>The GLA should provide a model planning condition aimed at preventing the use of emergency and standby generators for non-backup purposes, such as generating electricity for sale to the national grid.</p>
<p>If you think this is not the right approach, please detail how this approach should be modified.</p>	<p>Assume the trip rate includes both private vehicles and public transport? Developers should be required to provide all the relevant information in a single document, whether or not the information is also declared elsewhere among various planning documents.</p>

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<p>The new Class E was introduced under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 following the development of the guidance. As a result, the guidance requires the benchmark for office/light industrial to be used for use Class E (or where separate uses within use Class E are not specified).</p>	<p>Disagree with approach</p>
<p>Please comment on whether you think this guidance takes the right approach to calculating the benchmark trip rates for uses within Class E?</p>	<p>The benchmark for office and light industrial is far lower than for many other uses that are permitted within class E. An application relying on an assessment done on the basis that it is office and light industrial, should attract a condition limiting use to office/light industrial, and requiring a new air quality assessment if they implement any use other than office/light industrial.</p>
<p>If you think this is not the right approach, please</p>	<p>The guidance should assume worst case scenario, with the onus on the developer to justify a more favourable case scenario.</p>

Question	Comments
detail how this approach should be modified.	
Section 5 – Mitigation and offsetting	
<p>To what extent do you agree or disagree with the methodologies set out for mitigation and offsetting, including the switch of focus from PM10 to PM2.5? (Choose any one option) (Required)</p> <p>Strongly agree Somewhat agree Neither agree or disagree Strongly disagree Somewhat disagree</p>	Somewhat agree
Do you have any comments on the mitigation measures and offsetting calculations?	<p>The guidance is not clear about the relationship of the gap between achieving the standards and the amount of mitigation that would be necessary for an application that would be granted despite not meeting air quality neutral. Further guidance is needed on the methodology for the offsetting, it is not clear how Table 5.1 and the offsetting calculation is linked to Tables 5.2 and 5.3 relate to the calculation for offsetting for Transport Emission Benchmarks shortfall in a development.</p>
General	
Do you have any further comments to make on the guidance?	<p>Paragraph 1.1.1 states that benchmarks are based on research and evidence carried out by building and transport consultants. A reference should be provided to this evidence and research.</p> <p>In paragraph 2.6.1, the GLA should provide a model planning condition to require submission of the appliance details.</p> <p>In paragraph 3.1.1 the minor developments should not be excluded to demonstrate that the BEB has been met, when the development is, in or adjacent to a GLA air quality focus area, or in an Opportunity Area.</p> <p>The Building Emissions Benchmarks should include both PM10 and PM2.5 emission benchmarks, to reduce the emissions of particulate matter from buildings.</p>

Question	Comments
	<p>Table 3.5 uses mixed units.</p> <p>Paragraph 3.4.1 should provide a reference to a list of Heat Network Priority Areas.</p> <p>The inclusion of Particulate Matter (PM10 and PM2.5) emissions in the benchmarks would be useful if mitigation and offsetting is required in the process later.</p> <p>In paragraph 4.1.1 minor developments should not be excluded from demonstrating that the Transport Emissions Benchmark (TEB) has been met, when the development is, in or adjacent to a GLA air quality focus area, or in an Opportunity Area.</p> <p>Footnote 3 on page 12 should provide a link to the TRAVL system and TRICS.</p> <p>Paragraph 4.2.1 should provide a link to TRICS</p> <p>Paragraph 5.1.3 should provide a link to part E of Policy SI 1, or an extract should be provided as an appendix.</p> <p>Paragraph 5.2.2 make a self reference. It appears the reference should be to Table 5.1?</p> <p>Paragraph 5.3.1 refers to Table 5.2 and 0. It appears the reference should be to Table 5.2 and Table 5.3 ?</p> <p>In Table 5.3, we would wish to query the source of these figures, and a reference to the source should be given. In particular, we would wish to know whether these figures based on the average of the fleet composition in some particular area? It is likely that roads in different areas would have a different traffic composition to the 'average' zone road, for example the South Circular Road which is on the boundary of the Inner London and Outer London Zone.</p> <p>Paragraph 2.1.2 states:</p> <p>“As the benchmarks are based on evidence and are designed to be challenging but achievable, mitigation or offsetting provisions should be the exception”</p> <p>The order of the examples in Appendix 1 should reflect this and example 1 should be the current example 3 and the current example 1 should be example 3 to show the hierarchy of the principles of “Air Quality Neutral” Meet the</p>

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	<p>benchmarks, mitigate to meet the benchmark and then offset due to non-compliance of the benchmarks.</p> <p>Paragraph A1.1.7 should insert the calculated trip rate value and insert the TEB figure in a similar manner to paragraph A1.1.4. This also applies to paragraphs A1.2.7 in example 2 and paragraph A1.3.7 in example 3.</p> <p>Example 2, following paragraph A1.2.8 includes an example of mitigation to reduce the TEB value. How is this verified?</p> <p>In Appendix 2 a worked example of requirements in respect a phased development should be given and included in an accompanying spreadsheet.</p> <p>The additional comments are;</p> <ul style="list-style-type: none"> • backup generators should be included within AQN benchmark calculations • the guidance should encourage zero emissions alternatives to generators • maximum generator testing hours should be reduced from current 50 hours/year • any solid fuel heating in new builds should be included in AQN benchmark calculations • servicing, deliveries and taxis should be included in the AQN transport benchmark
Air Quality Positive Guidance	
Section 1 - Applying Air Quality Positive	
<p>The guidance requires Air Quality Positive to be applied at the plan making stage (to masterplans and development briefs that include large-scale development sites that are likely to be subject to an Environmental Impact Assessment) and at the planning application stage (to masterplans and development briefs for large-</p>	<p>Southwark Plan 2022 sets out all development should meet or exceed air quality neutral. Large scale, agree but this could be extended to major development as a 'should' provide possibly to include more development.</p> <p>AQP should be extended to all development of over 10,000 square metres floorspace, or 10 or more residential units, at least in and adjacent to Air Quality Focus Areas, in the Central Activity Zone, and in Opportunity Areas.</p>

Question	Comments
<p>scale development proposals subject to an Environmental Impact Assessment). In the planning application context, 'large-scale development' refers to planning applications that are referable to the Mayor under the following categories of The Town and Country Planning (Mayor of London) Order 2008 which are detailed in Appendix 1: Category 1A Category 1B Category 2C(1)(a)-(f) Category 2C(2) Category 2C(3) Category 2D</p>	
<p>Do you agree with how the guidance is applied to development in London? Please share any comments you have on the routes to applying Air Quality Positive.</p>	<p>It could be clearer how policy can incentivise air quality positive at higher levels. How are construction emissions considered?</p>
<p>The guidance sets out criteria for when an Air Quality Positive Statement is required. To what extent do you agree or disagree with these criteria?</p>	<p>Somewhat agree</p>

Question	Comments
(Choose any one option) (Required) Strongly agree Somewhat agree Strongly disagree Neither agree or disagree Somewhat disagree	
Please share any comments you have on when an Air Quality Positive Statement should be required.	Definition of what is meant by net positive could be clearer in 1.1.1. Air Quality Positive percentages over the baseline of air quality neutral should be proportionate to development. Air Quality Positive should require a minimum percentage improvement over AQN, and the guidance should incentivise achievement at the highest attainable percentage improvement with respect to AQN.
Section 2 - Identifying measures and approaches	
The Air Quality Positive Statement will be deemed compliant if it demonstrates how the proposal will maximise benefits to air quality and mitigate exposure to air pollution. This should be outlined in a matrix of adopted measures, under four key themes (Better design and reducing exposure, Building emissions, Transport emissions and Innovation and future-proofing). Do you agree or disagree with these four themes under which the different measures could fall within?	Neither agree nor disagree

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(Choose any one option) (Required) Strongly agree Somewhat agree Neither agree or disagree Strongly disagree Somewhat disagree	
Please share any comments you have about the requirement for development proposals to complete a matrix of adopted measures. If you feel this could be improved, please specify why and how this should change?	Agree with the theme areas. Is there a reason that green energy has not been included here? Is this accounted for under carbon emissions reduction? There should be a fifth theme of embedded (including within construction) (whole supply chain) air quality emissions, to help discourage off-site emissions through materials and labour procurement
Section 3 - Air Quality Positive Statement	
To what extent do you agree or disagree with the proposed content and structure of the Air Quality Positive Statement? (Choose any one option) (Required) Strongly agree Somewhat agree Neither agree or disagree Strongly disagree Somewhat disagree	Strongly agree
Do you have any comments or suggestions for how the required	The GLA should publish model conditions to assist local authorities in securing Air Quality Positive in practice.

Question	Comments
content and structure of the Air Quality Positive Statement and/or matrix could be improved?	
To what extent do you agree or disagree with the minimum requirements for an Air Quality Positive Statement to be judged as compliant? (Choose any one option) (Required) Strongly agree Somewhat agree Neither agree or disagree Strongly disagree Somewhat disagree	Strongly agree
General	
Do you have any further comments to make on the guidance?	<p>How much over the air quality neutral counts as air quality positive? Is this going to be proportionately applied to different development types and scales? All air quality documentation should go in this air quality positive statement.</p> <p>All the information should be in the same place, without reference to other documents to make sure it can be properly assessed to meet the requirements. Paragraph 2.2.1 should include a link to the London Plan paragraph 9.1.15, or an extract should be included as an appendix.</p> <p>Paragraph 3.1.1 should set out the requirements of London Plan paragraph 9.1.13.</p> <p>Within 3.3 Building emissions should include other sources of PM_{2.5} e.g. from commercial catering, which contributes 25.8% of total PM_{2.5} emissions in Southwark. If these other sources are not included, developers and planners will only concentrate on heating and energy.</p>

Question	Comments
	<p data-bbox="507 235 1388 376">Air quality positive information should be all within the Air Quality Positive Assessment document, and not dispersed among other documents, for ease of assessment and verifying compliance.</p> <p data-bbox="507 421 1388 488">Paragraph A3.3.2.1 should provide a link to the listed dispersion models.</p> <p data-bbox="507 533 1388 600">Air Quality Positive statements should include design process dispersion model information mentioned in paragraph A3.2.3</p> <p data-bbox="507 645 1388 712">Paragraph A3.3.2 should provide a link to the Air Quality Neutral Guidance project and any similar projects.</p>