



Greater London Authority

The control of dust and emissions during construction and demolition supplementary planning guidance

CIWEM Response, November 2013

The Chartered Institution of Water and Environmental Management (CIWEM) is the leading professional and qualifying body for those who are responsible for the stewardship of environmental assets. The Institution provides independent comment, within a multi-disciplinary framework, on the wide range of issues related to water and environmental management, environmental resilience and sustainable development.

CIWEM welcomes the opportunity to provide comments to the Greater London Authority consultation on the control of dust and emissions during construction and demolition supplementary planning guidance (SPG). Our comments reflect the views and experiences of a range of our technical members working in air quality management. We have a number of general and specific comments which are detailed below, and trust that our comments are helpful to you in preparing the final document.

General comments

CIWEM welcomes the revised SPG including its useful operational refinements. For example, we consider the liaison meetings between high risk sites in very close proximity to each other to be helpful to minimise the cumulative effects of construction and demolition dust and emissions.

CIWEM believes the SPG will only improve air quality if the measures within it are fully implemented by the London Boroughs and the City of London and the mitigation measures are enforced. We are aware of Islington Borough Council having a dedicated enforcement officer for construction sites, paid for, we believe, by Section 106 agreements. This is a very positive development, however with the introduction of the Community Infrastructure Levy it might prove more difficult to allocate funding in the future. CIWEM would like the guidance to include a section specifically on the need for enforcement of the agreed mitigation measures.

A significant amount of monitoring has taken place around construction sites since the introduction of the existing GLA guidance, but that data is not in the public domain. We believe that as part of the dust and emission control planning conditions there should be a requirement for the data to be publically available on a website so that the profession is able to learn from it.

Specific comments

1. Subscripts for PM₁₀ and PM_{2.5} and superscript for µg/m³ is needed throughout the document.
2. Paragraph 1.8: a link should be added to Appendix 7 to clarify what Major Developments are considered to be in the first instance.

3. Paragraph 1.9: "Consequently. Therefore," one word needs to be removed from this sentence.
4. Paragraph 4.1: bullet point 4 that discusses the level of risk for health and soiling includes reference to a quantitative and qualitative explanation. The risk evaluation approach utilised in the SPG and in IAQM guidance is qualitative and we suggest the term "quantitative" is omitted.
5. Paragraph 5.41: could be expanded to link to the two construction sites where Calcium Magnesium Acetate (CMA) has already been used, as shown below:
"Whilst this latter trial occurred on operating waste sites, the benefits can be extended to construction / demolition sites, with particular reference to locations where a large volume of vehicles enter and exit the site, to help prevent resuspension. Two Crossrail sites have already used CMA (see over page). Appendix 10 provides guidance on the use of dust suppressants."
6. Page 50 dust suppressants example trial box: remove the sentence "The programme was carefully monitored and evaluated by King's College London" as the benefits for construction sites are based on the evaluation by King's for waste sites so this could be misleading. We also suggest removing the rest of the paragraph below the two example sites and augmenting Paragraph 5.41, as edited above, to highlight areas of most likely benefit on construction sites.
7. Appendix 10 Standard Operating Procedure Template: The third row, in the "What is in the document?" should also include:
 - Benefits and Limitations of Dust Suppressants; and
 - Standard Operating Procedure Template
8. Page 109 Benefits Table: The table has been corrupted in the draft SPG with some information in the wrong cells. The correct table is attached as an appendix.

Appendix 1: Benefits table

Dust Suppressant Information	Site Details
Dust Suppressant Name	Ice and Dust Away 25
Risk Assessment Information	Risk Assessment kept in site offices – safety files.
Storage Location	By storage cabin (with or without bunding as recommended by manufacturers instructions)
Key Site Operative responsible for dust suppressant applications	P Jones
Cover Site Operatives responsible for dust suppressant applications when key site operative is absent	S Smith
Safety Equipment	Safety glasses, gloves, high visibility clothing
Application Equipment	Backpack sprayer.
Treatment Areas	Skip storage area Skip unloading area Entrance area
Treatment Frequencies	Start of day and end of day And in response to elevated monitoring
Treatment Amounts	Skip storage area 10 litres undiluted Skip unloading area 12 litres undiluted Entrance area 15 litres undiluted
Treatment Durations	Skip storage area 15 minutes Skip unloading area 20 minutes Entrance area 25 minutes
Application Procedure	Laminated copy of 'Guidance for Site Personnel' kept in site diary and in storage cabin