



## Air Quality Assessment: Paddington Packet Boat, Hillingdon

February 2024



Experts in air quality  
management & assessment

## Document Control

<b>Client</b>	Paddington Packet Boat Developments Ltd.	<b>Principal Contact</b>	Alicia Privett (Nexus Planning)
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<b>Report Prepared By:</b>	Tomas Liska, Ricky Gellatly and Frances Marshall
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**Air Quality Consultants Ltd**  
**23 Coldharbour Road, Bristol BS6 7JT Tel: 0117 974 1086**  
**24 Greville Street, Farringdon, London, EC1N 8SS Tel: 020 3873 4780**  
**aqc@aqconsultants.co.uk**

Registered Office: 23 Coldharbour Road, Bristol BS6 7JT  
 Companies House Registration No: 2814570

## Executive Summary

The air quality impacts associated with the proposed residential development of the Paddington Packet Boat Public House on the corner of Packet Boat Lane and High Road have been assessed. The proposed development will provide managed student accommodation consisting of 61 studio apartments.

During the construction works, a range of best practice mitigation measures will be implemented to reduce dust emissions and the overall effect will be 'not significant'; appropriate measures have been set out in this report, to be included in the Dust Management Plan for the works.

The assessment has demonstrated that future residents of the proposed development will experience acceptable air quality, with pollutant concentrations below the air quality objectives.

The proposed development is car-free and therefore will not generate a significant number of additional vehicle movements, and heat and hot water will be provided by air source heat pumps. The proposed development will not, therefore, generate any significant emissions to air during its operation.

The proposed development has also been shown to meet the London Plan's requirement that new developments are at least 'air quality neutral'.

Overall, the construction and operational air quality effects of the proposed development are judged to be 'not significant'.

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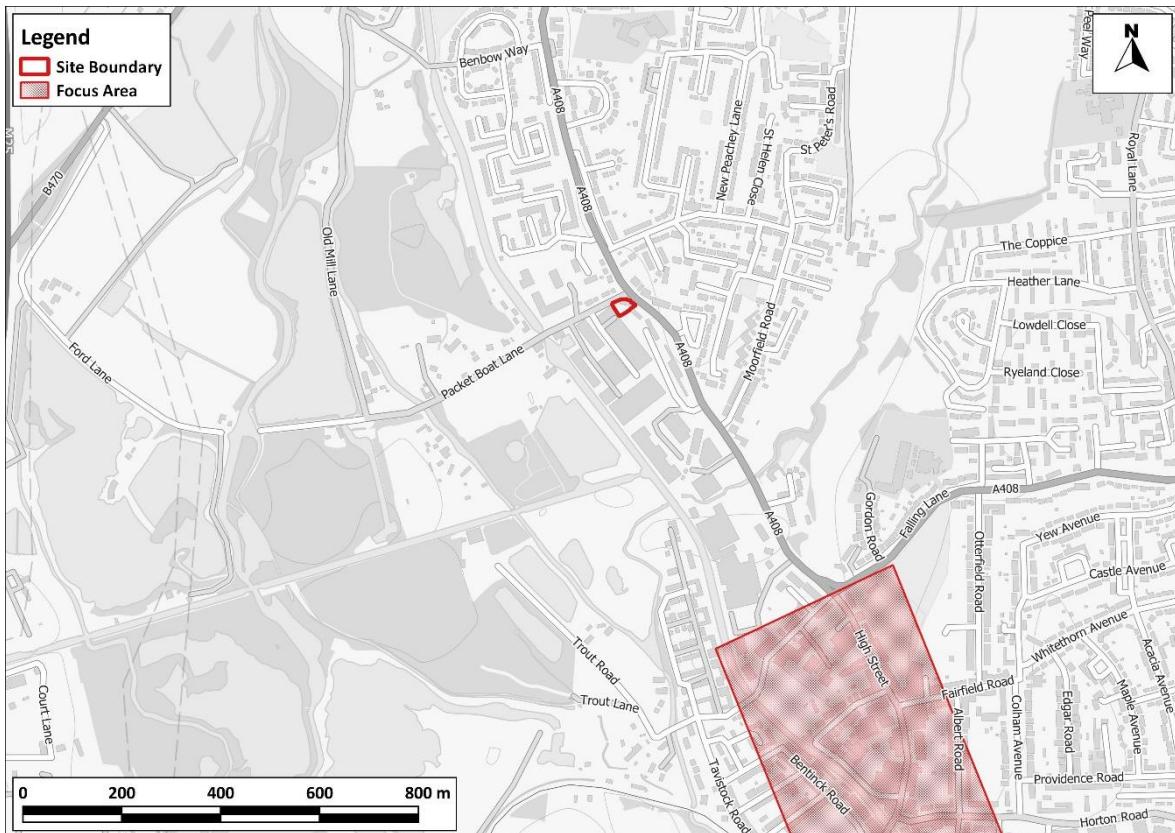
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## 1 Introduction

1.1 This report describes the potential air quality impacts associated with the proposed redevelopment of the vacant Paddington Packet Boat public house on the corner of Packet Boat Lane and High Road in the London Borough of Hillingdon (LBH) (hereafter referred to as the “site”). The proposals involve the demolition of the existing public house and the construction of a four-storey managed student accommodation building consisting of 61 studio apartments (hereafter referred to as the “proposed development”).

1.2 The proposed development lies within an Air Quality Management Area (AQMA) declared by the LBH for the south of the Borough for exceedances of the annual mean nitrogen dioxide ( $\text{NO}_2$ ) objective. It is also located 700 m north of one of the Greater London Authority’s (GLA’s) air quality Focus Areas; these are locations with high levels of human exposure where the annual mean limit value for nitrogen dioxide is exceeded. The location and setting of the proposed development are shown in Figure 1, along with the air quality Focus Area.



**Figure 1: Proposed Development Setting**

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- 1.3 The proposed development will introduce new exposure into this area of potentially poor air quality, thus an assessment is required to determine the air quality conditions that future users will experience. The proposed development will also generate additional traffic on local roads, which may impact on air quality at existing residential properties located in proximity to the proposed development. The main air pollutants of concern related to road traffic emissions are nitrogen dioxide and fine particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>).
- 1.4 The GLA's London Plan (GLA, 2021) requires new developments to be air quality neutral. The air quality neutrality of the proposed development has been assessed following the methodology provided in the latest GLA London Plan Guidance (Air Quality Neutral) (GLA, 2023a).
- 1.5 The GLA has also released Supplementary Planning Guidance (SPG) on the Control of Dust and Emissions from Construction and Demolition (GLA, 2014). The SPG outlines a risk assessment approach for construction dust assessment and helps determine the mitigation measures that will need to be applied. A construction dust assessment has been undertaken and the appropriate mitigation has been set out.
- 1.6 This report describes existing local air quality conditions in 2022 and considers air quality conditions at the proposed development in 2024, which is the earliest year of opening. The assessment of construction dust impacts focuses on the anticipated duration of the works. This report has been prepared taking into account all relevant local and national guidance and regulations, and follows a methodology agreed with the LBH.

## 2 Policy Context

2.1 All European legislation referred to in this report is written into UK law and remains in place.

### Air Quality Strategy 2007

2.2 The Air Quality Strategy (Defra, 2007) published by the Department for Environment, Food, and Rural Affairs (Defra) and Devolved Administrations, provides the policy framework for air quality management and assessment in the UK. It provides air quality standards and objectives for key air pollutants, which are designed to protect human health and the environment. It also sets out how the different sectors: industry, transport and local government, can contribute to achieving the air quality objectives. Local authorities are seen to play a particularly important role. The strategy describes the Local Air Quality Management (LAQM) regime that has been established, whereby every authority has to carry out regular reviews and assessments of air quality in its area to identify whether the objectives have been, or will be, achieved at relevant locations, by the applicable date. If this is not the case, the authority must declare an AQMA, and prepare an action plan which identifies appropriate measures that will be introduced in pursuit of the objectives.

### Air Quality Strategy 2023

2.3 The Air Quality Strategy: Framework for Local Authority Delivery 2023 (Defra, 2023a) sets out the strategic air quality framework for local authorities and other Air Quality Partners in England. It sets out their powers and responsibilities, and actions the Government expects them to take. It does not replace other air quality guidance documents relevant to local authorities.

### Clean Air Strategy 2019

2.4 The Clean Air Strategy (Defra, 2019) sets out a wide range of actions by which the Government will seek to reduce pollutant emissions and improve air quality. Actions are targeted at four main sources of emissions: Transport, Domestic, Farming and Industry. At this stage, there is no straightforward way to take account of the expected future benefits to air quality within this assessment.

### Reducing Emissions from Road Transport: Road to Zero Strategy

2.5 The Office for Low Emission Vehicles (OLEV) and Department for Transport (DfT) published a Policy Paper (DfT, 2018) in July 2018 outlining how the government will support the transition to zero tailpipe emission road transport and reduce tailpipe emissions from conventional vehicles during the transition. This paper affirms the Government's pledge to end the sale of new conventional petrol and diesel cars and vans by 2040, and states that the Government expects the majority of new cars and vans sold to be 100% zero tailpipe emission and all new cars and vans to have significant zero tailpipe emission capability by this year, and that by 2050 almost every car and van should have

zero tailpipe emissions. It states that the Government wants to see at least 50%, and as many as 70%, of new car sales, and up to 40% of new van sales, being ultra-low emission by 2030.

2.6 The paper sets out a number of measures by which Government will support this transition, but is clear that Government expects this transition to be industry and consumer led. The Government has recently announced that 80% of new cars and 70% of new vans sold in Great Britain must be zero emission by 2030, increasing to 100% by 2035. If these ambitions are realised then road traffic-related NOx emissions can be expected to reduce significantly over the coming decades, likely beyond the scale of reductions forecast in the tools utilised in carrying out this air quality assessment.

## Environment Act 2021

2.7 The UK's new legal framework for protection of the natural environment, the Environment Act (2021) passed into UK law in November 2021. The Act gives the Government the power to set long-term, legally binding environmental targets. It also establishes an Office for Environmental Protection (OEP), responsible for holding the Government to account and ensuring compliance with these targets.

2.8 The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 (SI 2023 No. 96) sets two new targets for future concentrations of PM<sub>2.5</sub>. These targets are described in Paragraph 3.5.

## Environmental Improvement Plan 2023

2.9 Defra published its 25 Year Environment Plan in 2018 (Defra, 2018a). The Environment Act (2021) requires Defra to review this Plan at least every five years. The Environmental Improvement Plan 2023 (Defra, 2023b) is the first revision. This outlines the progress made since 2018 and adds detail to the goals defined in the 2018 Plan, including that of achieving clean air.

2.10 The Environmental Improvement Plan 2023 sets out the new air quality targets which have been set for concentrations of PM<sub>2.5</sub>. These targets, which are described in more detail in Paragraph 3.5, include the long-term targets in the Statutory Instrument described in Paragraph 2.8, and interim targets to be achieved by 2028.

2.11 The 2023 Plan outlines the role of local authorities in helping it meet both its targets and existing commitments. It also outlines the respective roles of industry, agricultural sectors, and the DfT in providing the coordinated action required to meet both its new, and pre-existing targets and commitments.

## Planning Policy

### National Policies

2.12 The National Planning Policy Framework (NPPF) (2023) sets out planning policy for England. It states that the purpose of the planning system is to contribute to the achievement of sustainable development, and that the planning system has three overarching objectives, one of which (Paragraph 8c) is an environmental objective:

*"to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy".*

2.13 To prevent unacceptable risks from air pollution, Paragraph 180 of the NPPF states that:

*"Planning policies and decisions should contribute to and enhance the natural and local environment by... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air quality".*

2.14 Paragraph 191 states:

*"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development".*

2.15 More specifically, on air quality, Paragraph 192 makes clear that:

*"Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan".*

2.16 The NPPF is supported by Planning Practice Guidance (PPG) (Ministry of Housing, Communities & Local Government, 2019b), which includes guiding principles on how planning can take account of the impacts of new development on air quality. The PPG states that:

*"Defra carries out an annual national assessment of air quality using modelling and monitoring to determine compliance with Limit Values. It is important that the potential impact of new development on air quality is taken into account where the national assessment indicates that relevant limits have been exceeded or are near the limit, or where the need for emissions reductions has been identified".*

2.17 Regarding plan-making, the PPG states:

*"It is important to take into account air quality management areas, Clean Air Zones and other areas including sensitive habitats or designated sites of importance for biodiversity where there could be specific requirements or limitations on new development because of air quality".*

2.18 The role of the local authorities through the LAQM regime is covered, with the PPG stating that a local authority Air Quality Action Plan *"identifies measures that will be introduced in pursuit of the objectives and can have implications for planning"*. In addition, the PPG makes clear that *"Odour and dust can also be a planning concern, for example, because of the effect on local amenity"*.

2.19 Regarding the need for an air quality assessment, the PPG states that:

*"Whether air quality is relevant to a planning decision will depend on the proposed development and its location. Concerns could arise if the development is likely to have an adverse effect on air quality in areas where it is already known to be poor, particularly if it could affect the implementation of air quality strategies and action plans and/or breach legal obligations (including those relating to the conservation of habitats and species). Air quality may also be a material consideration if the proposed development would be particularly sensitive to poor air quality in its vicinity".*

2.20 The PPG sets out the information that may be required in an air quality assessment, making clear that:

*"Assessments need to be proportionate to the nature and scale of development proposed and the potential impacts (taking into account existing air quality conditions), and because of this are likely to be locationally specific".*

2.21 The PPG also provides guidance on options for mitigating air quality impacts, as well as examples of the types of measures to be considered. It makes clear that:

*"Mitigation options will need to be locationally specific, will depend on the proposed development and need to be proportionate to the likely impact. It is important that local planning authorities work with applicants to consider appropriate mitigation so as to ensure new development is appropriate for its location and unacceptable risks are prevented".*

### ***London-Specific Policies***

2.22 The key London-specific policies are summarised below, with more detail provided, where required, in Appendix A1.

### The London Plan

2.23 The London Plan (GLA, 2021) sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The key policy relating to air quality is Policy SI 1 on *Improving air quality*, Part B1 of which sets out three key requirements for developments:

*“Development proposals should not:*

- a) *lead to further deterioration of existing poor air quality*
- b) *create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits*
- c) *create unacceptable risk of high levels of exposure to poor air quality”.*

2.24 The Policy then details how developments should meet these requirements, stating:

*“In order to meet the requirements in Part 1, as a minimum:*

- a) *development proposals must be at least Air Quality Neutral*
- b) *development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures*
- c) *major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1*
- d) *development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure”.*

2.25 Regarding construction and demolition impacts, Part D of Policy SI 1 of the London Plan states:

*“In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance”.*

2.26 Part E of Policy SI 1 states the following regarding mitigation and offsetting of emissions:

*“Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable,*

*provided that equivalent air quality benefits can be demonstrated within the area affected by the development”.*

2.27 The explanatory text around Policy SI 1 of the London Plan states the following with regard to assessment criteria:

*“The Mayor is committed to making air quality in London the best of any major world city, which means not only achieving compliance with legal limits for Nitrogen Dioxide as soon as possible and maintaining compliance where it is already achieved, but also achieving World Health Organisation targets for other pollutants such as Particulate Matter.*

*The aim of this policy is to ensure that new developments are designed and built, as far as is possible, to improve local air quality and reduce the extent to which the public are exposed to poor air quality. This means that new developments, as a minimum, must not cause new exceedances of legal air quality standards, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits. Where limit values are already met, or are predicted to be met at the time of completion, new developments must endeavour to maintain the best ambient air quality compatible with sustainable development principles.*

*Where this policy refers to ‘existing poor air quality’ this should be taken to include areas where legal limits for any pollutant, or World Health Organisation targets for Particulate Matter, are already exceeded and areas where current pollution levels are within 5 per cent of these limits”.*

2.28 The London Plan includes a number of other relevant policies, which are detailed in Appendix A1.

#### [London Environment Strategy](#)

2.29 The London Environment Strategy was published in May 2018 (GLA, 2018a). The strategy considers air quality in Chapter 4; the Mayor’s main objective is to create a “zero emission London by 2050”. Policy 4.2.1 aims to *“reduce emissions from London’s road transport network by phasing out fossil fuelled vehicles, prioritising action on diesel, and enabling Londoners to switch to more sustainable forms of transport”*. The strategy sets a target to achieve, by 2030, the guideline value for PM<sub>2.5</sub> which was set by the World Health Organisation (WHO) in 2005. An implementation plan for the strategy has also been published which sets out what the Mayor will do between 2018 and 2023 to help achieve the ambitions in the strategy.

#### [Mayor’s Transport Strategy](#)

2.30 The Mayor’s Transport Strategy (GLA, 2018b) sets out the Mayor’s policies and proposals to reshape transport in London over the next two decades. The Strategy focuses on reducing car dependency and increasing active sustainable travel, with the aim of improving air quality and creating healthier streets. It notes that development proposals should *“be designed so that walking and cycling are the most appealing choices for getting around locally”*.

### GLA SPG: The Control of Dust and Emissions During Construction and Demolition

2.31 The GLA's SPG on The Control of Dust and Emissions During Construction and Demolition (GLA, 2014) outlines a risk assessment based approach to considering the potential for dust generation from a construction site, and sets out what mitigation measures should be implemented to minimise the risk of construction dust impacts, dependent on the outcomes of the risk assessment. This guidance is largely based on the Institute of Air Quality Management's (IAQM's)<sup>1</sup> guidance (IAQM, 2024), and it states that "*the latest version of the IAQM Guidance should be used*".

### Air Quality Focus Areas

2.32 The GLA has identified 160 air quality Focus Areas in London. These are locations that not only exceed the annual mean limit value for nitrogen dioxide, but also have high levels of human exposure. They do not represent an exhaustive list of London's air quality hotspot locations, but locations where the GLA believes the problem to be most acute. They are also areas where the GLA considers there to be the most potential for air quality improvements and are, therefore, where the GLA and Transport for London (TfL) will focus actions to improve air quality.

2.33 The proposed development is located 700 m north of the West Drayton/Yiewsley air quality Focus Area.

### Local Policies

2.34 The Local Plan Part 1: Strategic Policies (London Borough of Hillingdon, 2012) was adopted by LBH in November 2012, and includes the following three Strategic Objectives (SOs) and five policies that are directly related to air quality:

- Strategic Objectives:
  - SO10: "*Improve and protect air... quality...*";
  - SO11: "*...minimise emissions of... local air quality pollutants from new development and transport*"; and
  - SO23: "*Develop and implement a strategy for Heathrow Opportunity Area, in order to ensure that local people benefit from... environmental improvements including reductions in... poor air quality*";
- Policies:
  - Policy E2 'Location of Employment Growth' states that "*...The Council will promote development in highly accessible locations that delivers sustainable travel patterns and*

<sup>1</sup> The IAQM is the professional body for air quality practitioners in the UK.

*contributes to the improvement of existing networks to reduce emissions and impacts on air quality...”;*

- Policy E3 'Strategy for Heathrow Opportunity Area' states that "*The Council will prepare a Local Development Document (LDD) for the Heathrow area...The LDD will also set... measures to improve local air quality*";
- Policy BE1 'Built Environment' states that "*The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents. All new development should... maximise the opportunities for all new homes to contribute to... reducing emissions of local air quality pollutants...*";
- Policy EM1 'Climate Change Adaptation and Mitigation' states that "*The Council will ensure that climate change mitigation is addressed at every stage of the development process by:*

  - *Promoting the use of decentralised energy within large scale development whilst improving local air quality levels...;*
  - *Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality.*
  - *Targeting areas of poor air quality for additional emissions reductions*"; and

- Policy EM8 'Land, Water, Air and Noise' states that "*All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.*

*All major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate; actively contribute to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels; deliver increased planting through soft landscaping and living walls and roofs; and provide a management plan for ensuring air quality impacts can be kept to a minimum.*

*The Council seeks to reduce the levels of pollutants referred to in the Government's National Air Quality Strategy and will have regard to the Mayor's Air Quality Strategy. London Boroughs should also take account of the findings of the Air*

*Quality Review and Assessments and Action plans, in particular where Air Quality Management Areas have been designated.*

*The Council has a network of Air Quality Monitoring stations but recognises that this can be widened to improve understanding of air quality impacts. The Council may therefore require new major development in an AQMA to fund additional air quality monitoring stations to assist in managing air quality improvements”.*

2.35 The LBH adopted the Local Plan Part 2: Development Management Policies (London Borough of Hillingdon, 2020) in January 2020, which delivers the detail of the strategic policies set out in the Local Plan Part 1: Strategic Policies. Together the documents form a comprehensive development strategy for the Borough up to 2026. The Local Plan Part 2 includes the following six policies that relate to air quality:

- Policy DMEI 1 ‘Living Walls and Roofs and on-site Vegetation’ states that “...Major development in Air Quality Management Areas must provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate”;
- Policy DMEI 3 ‘Decentralised Energy’ states that “...The Council will support the development of DENs [decentralised energy networks] and energy centres in principle, subject to meeting the wider policy requirements of this plan and in particular on design and air quality”;
- Policy DMEI 14 ‘Air Quality’ states that:
 

*“A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.*

*B) Development proposals should, as a minimum:*

  - i) be at least ‘air quality neutral’;*
  - ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and*
  - iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area”.*
- Policy DMT 1 ‘Managing Transport Impacts’ states that “...In order for developments to be acceptable they are required to... have no significant adverse transport or associated air quality... impacts on the local and wider environment, particularly on the strategic road network...”;

- Policy DMT 2 'Highways Impacts' states that "*Development proposals must ensure that... they do not contribute to the deterioration of air quality...*"; and
- Policy DMT 7 'Freight' states that "*Development proposals that generate a high number and/or intensity of transport and movements such as those relating to logistics and distribution or freight will be required to demonstrate that... there is no deleterious impact on...local air quality levels...*"

2.36 The LBH also adopted a Supplementary Planning Document (SPD) on Planning Obligations (London Borough of Hillingdon, 2014) in July 2014, which states that:

*"Obligations may be sought to ensure no detrimental impacts on air quality and/or to ensure compliance with the objective of the AQMA. The following circumstances may establish a requirement for planning obligations:*

- *As a recommendation of an air quality assessment;*
- *To mitigate the impacts from emissions from new development where these cannot be resolved through other means such as planning conditions, travel plans or statutory licenses;*
- *To mitigate impacts on new development where floor space is to be occupied for significant parts of the day, such as residential, where located in an area of poor air quality; and*
- *To mitigate air quality impacts during the construction phase where these cannot be controlled through conditions or other statutory licenses."*

## Building Standards

2.37 Part F(1) of Schedule 1 of the Building Regulations 2010 as amended June 2022 (Ministry of Housing, Communities & Local Government, 2022) places a duty on building owners, or those responsible for relevant building work<sup>2</sup>, to ensure adequate ventilation is provided to building occupants.

2.38 Approved Document F (HM Government, 2021a), which accompanies the Building Regulations, explains that care should be taken to minimise entry of external air pollutants. Specific steps should be taken to manage ventilation intakes where the building is near to a significant source of emissions, or if local ambient concentrations exceed values set in the Air Quality Standards Regulations 2010 (see Paragraph 3.11, later). These steps include maximising the distance between emission source and air intake, considering likely dispersion patterns, and considering the timing of pollution releases when designing the ventilation system.

<sup>2</sup> Building work is a legal term for work covered by the Building Regulations. With limited exemptions, the Regulations apply to all significant building work, including erecting or extending a building.

2.39 Part S(1) of Schedule 1, and Regulation 44D, of the Building Regulations 2010 (Ministry of Housing, Communities & Local Government, 2022) define a requirement for the provision of infrastructure for charging electric vehicles. Precise requirements are explained further within Approved Document S (HM Government, 2021b) and depend on the overall number of parking spaces provided and the average financial cost of installation.

2.40 Compliance with the Building Regulations is not required for planning approval, but it is assumed that the Regulations will be complied with in the completed development.

## Air Quality Action Plans

### National Air Quality Plan

2.41 Defra has produced an Air Quality Plan to tackle roadside nitrogen dioxide concentrations in the UK (Defra, 2017); a supplement to the 2017 Plan (Defra, 2018a) was published in October 2018 and sets out the steps Government is taking in relation to a further 33 local authorities where shorter-term exceedances of the limit value were identified. Alongside a package of national measures, the 2017 Plan and the 2018 Supplement require those identified English Local Authorities (or the GLA in the case of London Authorities) to produce local action plans and/or feasibility studies. These plans and feasibility studies must have regard to measures to achieve the statutory limit values within the shortest possible time, which may include the implementation of a CAZ. There is currently no straightforward way to take account of the effects of the 2017 Plan or 2018 Supplement in this assessment; however, consideration has been given to whether there is currently, or is likely to be in the future, a limit value exceedance in the vicinity of the proposed development. This assessment has principally been carried out in relation to the air quality objectives, rather than the limit values that are the focus of the Air Quality Plan.

### Local Air Quality Action Plan

2.42 The LBH has declared an AQMA for nitrogen dioxide for the south of the borough, defined by the A40 corridor from the western borough boundary, east to the intersection with the Yeading Brook and north until its intersection with the Chiltern-Marylebone railway line. The Council has since developed an Air Quality Action Plan (London Borough of Hillingdon, 2019a). This plan identifies the Council's objectives to:

- "a) improve the areas of poorer air quality as soon as possible;*
- "b) to continue to improve air quality across the borough and reduce public exposure to air pollution, especially for vulnerable groups within our communities such as the young, the old and those already suffering with associated respiratory illnesses".*

2.43 With these objectives in mind, LBH will prioritise the following actions:

- *“Lead by example;*
- *Prioritise reducing public exposure and improving air quality around schools;*
- *Prioritise the implementation of improvement strategies in the AQ Focus Areas;*
- *Ensure the integration of the Healthy Streets approach in relevant council work programmes;*
- *Ensure the planning system supports the achievement of air quality improvements in relation to new developments;*
- *Raise awareness via targeted campaigns;*
- *Promote the use of greener walking and cycling routes to help the delivery of the Council’s transport objective of an increased mode share for walking and cycling; and*
- *Work with external stakeholders.”*

### 3 Assessment Criteria

- 3.1 The Government has established a set of air quality standards and objectives to protect human health. The 'standards' are set as concentrations below which effects are unlikely even in sensitive population groups, or below which risks to public health would be exceedingly small. They are based purely upon the scientific and medical evidence of the effects of an individual pollutant. The 'objectives' set out the extent to which the Government expects the standards to be achieved by a certain date. They take account of economic efficiency, practicability, technical feasibility and timescale. The objectives for use by local authorities are prescribed within the Air Quality (England) Regulations (2000) and the Air Quality (England) (Amendment) Regulations (2002).
- 3.2 The UK-wide objectives for nitrogen dioxide and PM<sub>10</sub> were to have been achieved by 2005 and 2004 respectively, and continue to apply in all future years thereafter. The PM<sub>2.5</sub> objective was to be achieved by 2020. Measurements across the UK have shown that the 1-hour nitrogen dioxide objective is unlikely to be exceeded at roadside locations where the annual mean concentration is below 60 µg/m<sup>3</sup> (Defra, 2022). Therefore, 1-hour nitrogen dioxide concentrations will only be considered if the annual mean concentration is above this level. Measurements have also shown that the 24-hour mean PM<sub>10</sub> objective could be exceeded at roadside locations where the annual mean concentration is above 32 µg/m<sup>3</sup> (Defra, 2022).
- 3.3 The objectives apply at locations where members of the public are likely to be regularly present and are likely to be exposed over the averaging period of the objective. The GLA explains where these objectives will apply in London (GLA, 2019). The annual mean objectives for nitrogen dioxide and PM<sub>10</sub> are considered to apply at the façades of residential properties, schools, hospitals and care homes etc., the gardens of residential properties, school playgrounds and the grounds of hospitals and care homes. The 24-hour mean objective for PM<sub>10</sub> is considered to apply at the same locations as the annual mean objective, as well as at hotels. The 1-hour mean objective for nitrogen dioxide applies wherever members of the public might regularly spend 1-hour or more, including outdoor eating locations and pavements of busy shopping streets.
- 3.4 For PM<sub>2.5</sub>, the objective set by Defra for local authorities is to work toward reducing concentrations without setting any specific numerical value. In the absence of a numerical objective, it is convention to assess local air quality impacts against the limit value (see Paragraph 3.11), originally set at 25 µg/m<sup>3</sup> and currently set at 20 µg/m<sup>3</sup>.
- 3.5 Defra has also recently set two new targets, and two new interim targets, for PM<sub>2.5</sub> concentrations in England. One set of targets focuses on absolute concentrations. The long-term target is to achieve an annual mean PM<sub>2.5</sub> concentration of 10 µg/m<sup>3</sup> by the end of 2040, with the interim target being a

value of 12  $\mu\text{g}/\text{m}^3$  by the start of 2028<sup>3</sup>. The second set of targets relate to reducing overall population exposure to PM<sub>2.5</sub>. By the end of 2040, overall population exposure to PM<sub>2.5</sub> should be reduced by 35% compared with 2018 levels, with the interim target being a reduction of 22% by the start of 2028.

3.6 Defra will assess compliance with the population exposure targets by averaging concentrations measured at its own background monitoring stations. This will not consider small changes over time to precisely where people are exposed (such as would relate to exposure introduced by a new development). Furthermore, as explained in Paragraph 2.11, all four new targets provide metrics against which central Government can assess its own progress. While local authorities have an important role delivering the required improvements, these are expected to relate to controlling emissions and not to directly assessing PM<sub>2.5</sub> concentrations against the targets.

3.7 In March 2023, the Department for Levelling Up, Housing and Communities (DLUHC, 2023) explained that the new PM<sub>2.5</sub> targets will:

*“need to be integrated into the planning system, and in setting out planning guidance for local authorities and businesses, we will consider the specific characteristics of PM<sub>2.5</sub>. The guidance will be forthcoming in due course, until then we expect local authorities to continue to assess local air quality impacts in accordance with existing guidance.”*

3.8 Defra has also provided advice (Defra, 2023c) which explains that there is no current requirement to consider the new PM<sub>2.5</sub> targets in planning decisions and that guidance to local planning authorities will be forthcoming before this position changes. In the future, when planning decisions do need to consider the new targets, the expectation is that this will focus on reducing emissions from new development rather than there being a direct requirement for planning-related air quality assessments to predict PM<sub>2.5</sub> concentrations.

3.9 For the time being, therefore, no assessment is required, and indeed no robust assessment is possible, in relation to the new PM<sub>2.5</sub> targets and they are not considered further.

3.10 As explained in Paragraph 2.29, the GLA has set a target to achieve an annual mean PM<sub>2.5</sub> concentration of 10  $\mu\text{g}/\text{m}^3$  by 2030. This target was derived from an air quality guideline set by WHO in 2005. In 2021, WHO updated its guidelines, but the London Environment Strategy (GLA, 2018a) considers the 2005 guideline of 10  $\mu\text{g}/\text{m}^3$ . While there is no explicit requirement to assess against the GLA target of 10  $\mu\text{g}/\text{m}^3$ , it has nevertheless been included within this assessment.

3.11 European Union (EU) Directive 2008/50/EC (The European Parliament and the Council of the European Union, 2008) sets limit values for nitrogen dioxide, PM<sub>10</sub> and PM<sub>2.5</sub>, and is implemented in

<sup>3</sup> Meaning that it will be assessed using measurements from 2027. The 2040 target will be assessed using measurements from 2040. National targets are assessed against concentrations expressed to the nearest whole number, for example a concentration of 10.4  $\mu\text{g}/\text{m}^3$  would not exceed the 10  $\mu\text{g}/\text{m}^3$  target.

UK law through the Air Quality Standards Regulations (2010)<sup>4</sup>. The limit values for nitrogen dioxide and PM<sub>10</sub> are the same numerical concentrations as the UK objectives, but achievement of the limit values is a national obligation rather than a local one and concentrations are reported to the nearest whole number. In the UK, only monitoring and modelling carried out by Central Government meets the specification required to assess compliance with the limit values. Central Government does not normally recognise local authority monitoring or local modelling studies when determining the likelihood of the limit values being exceeded, unless such studies have been audited and approved by Defra and DfT's Joint Air Quality Unit (JAQU).

3.12 The relevant air quality criteria for this assessment are provided in Table 1

**Table 1: Air Quality Criteria for Nitrogen Dioxide, PM<sub>10</sub> and PM<sub>2.5</sub>.**

Pollutant	Time Period	Objective
Nitrogen Dioxide	1-hour Mean	200 µg/m <sup>3</sup> not to be exceeded more than 18 times a year
	Annual Mean	40 µg/m <sup>3</sup>
PM <sub>10</sub>	24-hour Mean	50 µg/m <sup>3</sup> not to be exceeded more than 35 times a year
	Annual Mean	40 µg/m <sup>3</sup> <sup>a</sup>
PM <sub>2.5</sub> <sup>b</sup>	Annual Mean	20 µg/m <sup>3</sup>
		10 µg/m <sup>3</sup> by 2030

<sup>a</sup> A proxy value of 32 µg/m<sup>3</sup> as an annual mean is used in this assessment to assess the likelihood of the 24-hour mean PM<sub>10</sub> objective being exceeded. Measurements have shown that, above this concentration, exceedances of the 24-hour mean PM<sub>10</sub> objective are possible (Defra, 2021a).

<sup>b</sup> There is no numerical PM<sub>2.5</sub> objective for local authorities (see Paragraph 3.4). Convention is to assess against the UK limit value which is currently 20 µg/m<sup>3</sup>. World Health Organisation Guideline for Annual Mean PM<sub>2.5</sub>.

3.13 The WHO has set a guideline for annual mean PM<sub>2.5</sub> of 10 µg/m<sup>3</sup>. The guideline is not currently in UK regulations and there is no explicit requirement to assess against it. However, achievement of the guideline is a long-term aspiration of the UK Government (Defra, 2019) and, as set out in Paragraph 2.29, the GLA aims to achieve it by 2030. As such, consideration has been included within this assessment.

## Construction Dust Criteria

3.14 There are no formal assessment criteria for dust. In the absence of formal criteria, the approach developed by the IAQM (2024) has been used (the GLA's SPG (GLA, 2014) recommends that the assessment be based on the latest version of the IAQM guidance). Full details of this approach are provided in Appendix A2.

<sup>4</sup> As amended through The Air Quality Standards (Amendment) Regulations 2016 and The Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020.

## Screening Criteria for Road Traffic Assessments

3.15 Environmental Protection UK (EPUK) and the IAQM recommend a two-stage screening approach (Moorcroft and Barrowcliffe et al, 2017) to determine whether emissions from road traffic generated by a development have the potential for significant air quality impacts. The approach, as described in Appendix A3, first considers the size and parking provision of a development; if the development is residential and is for fewer than ten homes or covers less than 0.5 ha, or is non-residential and will provide less than 1,000 m<sup>2</sup> of floor space or cover a site area of less than 1 ha, and will provide ten or fewer parking spaces, then there is no need to progress to a detailed assessment.

3.16 The second stage then compares the changes in vehicle flows on local roads that a development will lead to against specified screening criteria. The screening thresholds (described in full in Appendix A3) inside an AQMA are a change in flows of more than 25 Heavy Duty Vehicles (HDVs) or 100 Light Duty Vehicles (LDVs) per day; outside of an AQMA the thresholds are 100 HDVs or 500 LDVs. Where these criteria are exceeded, a detailed assessment is likely to be required, although the guidance advises that *“the criteria provided are precautionary and should be treated as indicative”*, and *“it may be appropriate to amend them on the basis of professional judgement”*.

## 4 Assessment Approach

### Consultation

4.1 The assessment follows a methodology agreed with the LBH via email correspondence between Val Beale (Air Quality Officer at the LBH) and Tomas Liska (Air Quality Consultants) in June 2021. Specifically, it was agreed that a qualitative (screening) assessment of air quality is sufficient, and that construction dust and air quality neutral assessments are also required.

### Existing Conditions

4.2 Existing sources of emissions and baseline air quality conditions within the study area have been defined using a number of approaches:

- industrial sources that may affect the area have been identified using Defra's Pollutant Release and Transfer Register (Defra, 2024a);
- local sources have been identified through examination of LBH's Air Quality Review and Assessment reports;
- information on existing air quality has been obtained by collating the results of monitoring carried out by LBH;
- background concentrations have been defined using Defra's 2018-based background maps (Defra, 2024b). These cover the whole of the UK on a 1x1 km grid. The background annual mean nitrogen dioxide maps for 2022 have been calibrated against concurrent measurements from Inner London monitoring sites (AQC, 2023). The calibration factor calculated has also been applied to future year backgrounds. Mapped background concentrations of PM<sub>10</sub> and PM<sub>2.5</sub> have not been adjusted; and
- whether or not there are any exceedances of the annual mean limit value for nitrogen dioxide in the study area has been identified using the maps of roadside concentrations published by Defra (2020; 2024c) as well as from any nearby Automatic Urban and Rural Network (AURN) monitoring sites (which operate to the required data quality standards). These are the maps used by the UK Government, together with the AURN results, to identify and report exceedances of the limit value. The national maps of roadside PM<sub>10</sub> and PM<sub>2.5</sub> concentrations (Defra, 2024c), which are available for the years 2009 to 2019, show no exceedances of the limit values anywhere in the UK in 2019.

### Construction Impacts

4.3 The construction dust assessment considers the potential for impacts within 250 m of the site boundary, or within 50 m of roads used by construction vehicles. The assessment methodology

follows the GLA's SPG on the Control of Dust and Emissions During Construction and Demolition (GLA, 2014), which is based on that provided by IAQM (2024). This follows a sequence of steps.

- Step 1 is a basic screening stage, to determine whether the more detailed assessment provided in Step 2 is required.
- Step 2a determines the potential for dust to be raised from on-site works and by vehicles leaving the site. Step 2b defines the sensitivity of the area to any dust that may be raised. Step 2c combines the information from Steps 2a and 2b to determine the risk of dust impacts without appropriate mitigation.
- Step 3 uses this information to determine the appropriate level of mitigation required to ensure that there should be no significant effects.

4.4 Appendix A2 explains the approach in more detail.

## Road Traffic Impacts

4.5 The first step in considering the road traffic impacts of the proposed development has been to screen the development and its traffic generation against the criteria set out in the EPUK/IAQM guidance (Moorcroft and Barrowcliffe et al, 2017), as described in Paragraph 3.15 and detailed further in Appendix A3. Where impacts can be screened out there is no need to progress to a more detailed assessment, as has been the case in this assessment.

## Assessment of Significance

### ***Construction Dust Significance***

4.6 Guidance from the IAQM (2024) is that, with appropriate mitigation in place, the effects of construction dust will be 'not significant'. This is the latest version of the guidance upon which the assessment methodology set out in the GLA guidance (GLA, 2014) is based (the GLA guidance advises that the latest version of the IAQM guidance should always be used). The assessment thus focuses on determining the appropriate level of mitigation so as to ensure that effects will normally be 'not significant'.

### ***Operational Significance***

4.7 There is no official guidance in the UK in relation to development control on how to assess the significance of air quality impacts. The approach developed jointly by EPUK and the IAQM (Moorcroft and Barrowcliffe et al, 2017) has therefore been used. The overall significance of the air quality impacts is determined using professional judgement; the experience of the consultants preparing the report is set out in Appendix A4. Full details of the EPUK/IAQM approach are provided in Appendix A3.

## **'Air Quality Neutral'**

- 4.8 The GLA's London Plan Guidance (Air Quality Neutral) (GLA, 2023a) sets out guidance on how an 'air quality neutral' assessment should be undertaken. It also provides a methodology for calculating an offsetting payment if a development is not 'air quality neutral' and it is not possible to identify or agree appropriate and adequate mitigation.
- 4.9 The guidance provides a simplified assessment approach for developments that are 'car free' and do not include any centralised combustion plant, which has been followed in this report.

## 5 Baseline Conditions

### Relevant Features

- 5.1 The proposed development is located on the corner of High Road and Packet Boat Lane in Uxbridge, Cowley approximately 3 km to the south of Uxbridge town centre. The application site currently consists of a vacant public house and an adjacent car park to the rear of the building. The site is located in a residential area, however there are commercial properties immediately to the southwest.
- 5.2 The proposed development is located within an AQMA, and as highlighted in Figure 1, is 700 m north of the West Drayton/Yiewsley GLA air quality Focus Area.

### Industrial sources

- 5.3 No significant industrial sources have been identified that are likely to affect the proposed development, in terms of air quality.

### Local Air Quality Monitoring

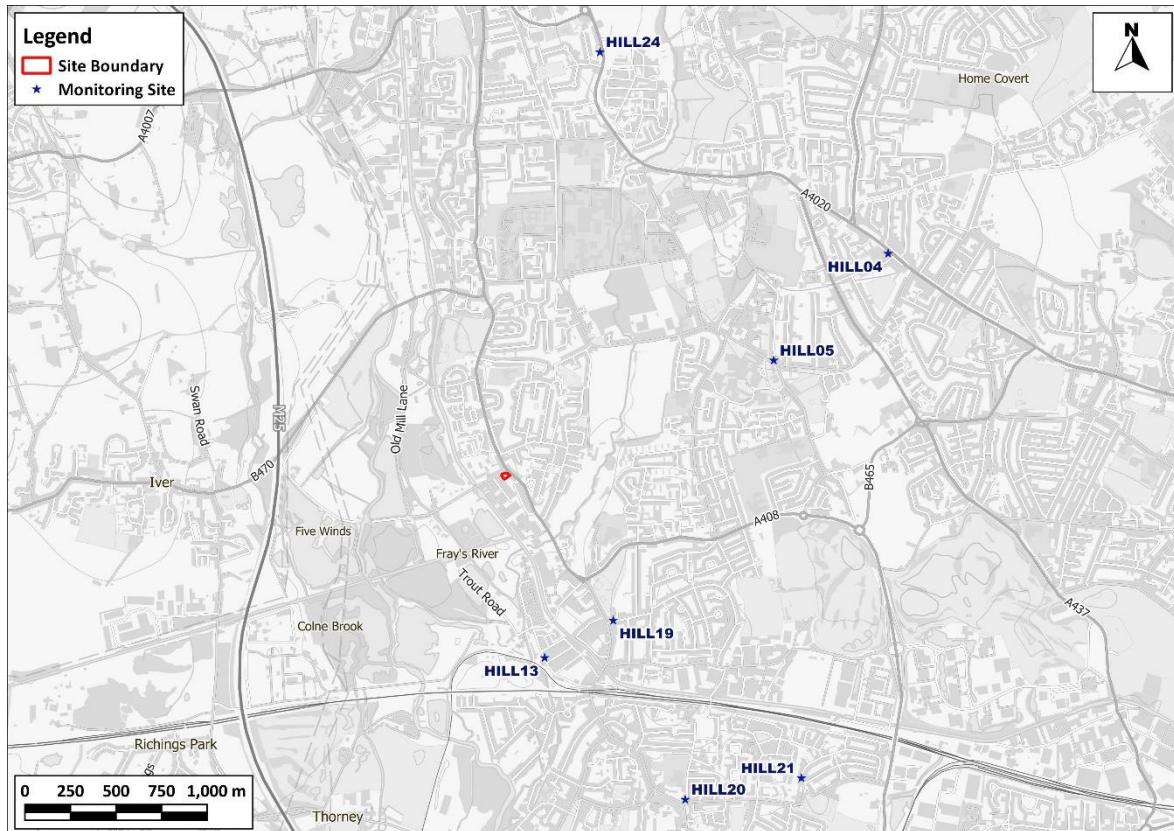
- 5.4 LBH operates 11 air quality automatic monitoring stations within its area, however none of these are located close to the proposed development.
- 5.5 The LBH also operates a number of nitrogen dioxide monitoring sites using diffusion tubes prepared and analysed by Gradko International (using the 50% TEA in acetone method). There are seven such sites within 2.5 km of the proposed development. These include site HILL19 deployed in Fairfield Road 1 km to the southeast and site HILL24 deployed in Uxbridge on Hillingdon Road 2.4 km to the northeast of the proposed development.
- 5.6 Annual mean nitrogen dioxide results for the years 2016 to 2022<sup>5</sup> for the closest diffusion tubes, within 2.5 km, are summarised in Table 2. The monitoring locations are shown in Figure 2. The monitoring data have been taken from LBH's 2023 Annual Status Report (London Borough of Hillingdon, 2023).

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<sup>5</sup> While 2020 and 2021 results have been presented in this Section for completeness, they are not relied upon in any way as they will not be representative of 'typical' air quality conditions due to the considerable impact of the Covid-19 pandemic on traffic volumes and thus pollutant concentrations.

**Table 2: Summary of Annual Mean NO<sub>2</sub> Monitoring (µg/m<sup>3</sup>)**

Site ID	Site Type	Location	2016	2017	2018	2019	2020	2021	2022
<b>HILL04</b>	Roadside	Hillingdon Primary School, Uxbridge Road	26.8	28.2	28.5	27.8	22.6	23.3	24.7
<b>HILL05</b>	Roadside	Hillingdon Hospital, Colham Road	32.3	36.1	33.4	34.1	27.4	25.4	27.8
<b>HILL13</b>	Roadside	31 Tavistock Road	25.8	26.9	29.5	27.9	19.9	21.0	21.0
<b>HILL19</b>	Urban Background	1A Fairfield Road	32.0	37.0	35.0	34.6	27.1	27.6	28.7
<b>HILL20</b>	Urban Background	1 Porters Way	35.9	37.9	36.6	36.6	31.6	31.5	34.5
<b>HILL21</b>	Urban Background	5-7 Mulberry Crescent	29.6	34.7	34.9	32.3	23.4	24.1	27.9
<b>HILL24</b>	Roadside	59 Hillingdon Road	35.5	40.0	36.9	34.7	27.6	32.0	31.1
<b>Objective</b>			<b>40</b>						



**Figure 2: Nitrogen Dioxide Monitoring Locations**

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- 5.7 As shown in Table 2, no exceedances of the annual mean nitrogen dioxide objective were measured at any nearby roadside or background site between 2016 and 2022. These includes sites located with higher volumes of vehicles compared to the A408, which is located on the eastern façade of the proposed development. For example, based on the LAEI traffic data (GLA, 2021b) the A4020 at site HILL04 and HILL24 carries approximately 41,000 and 39,000 vehicles daily, respectively, compared to approximately 21,000 on the A408.
- 5.8 Furthermore, the façade of the proposed development is located approximately 8 m from the A408, which is set back further than the LBH roadside monitoring sites (listed in Table 2), which are located up to 5 m from the kerb.
- 5.9 Based on the above, it is therefore expected that due to the distance of the proposed development away from the road and the lower volumes of traffic on the A408 compared to other roads, annual mean nitrogen dioxide concentrations at the proposed development will be lower than monitoring results in Table 2 and as such will be below the objective. As the annual mean concentrations at all

of the diffusion tube monitoring sites are below 60 µg/m<sup>3</sup>, exceedances of the 1-hour mean nitrogen dioxide objective across the study area are unlikely (Defra, 2022).

5.10 There are five automatic monitoring stations within 5 km of the proposed development which measure PM<sub>10</sub> and/or PM<sub>2.5</sub> concentrations. The nearest monitor to the proposed development is the London Hillingdon (HIL) urban background automatic monitoring station, located approximately 3.1 km to the southeast of the proposed development. Monitoring sites HIL4 (approximately 3.7 km to the south of the proposed development), T55 (4.2 km to the south of the proposed development) and HRL (4.5 km to the southeast of the proposed development) also measure concentrations of PM<sub>10</sub> and PM<sub>2.5</sub>, whilst HIL1 (approximately 3.5 km to the south of the proposed development), measures PM<sub>10</sub> only. The monitoring locations are shown in Figure 3. Annual mean results for the years 2016 to 2022 are summarised in Table 3, while results relating to the daily mean objective are summarised in Table 4.

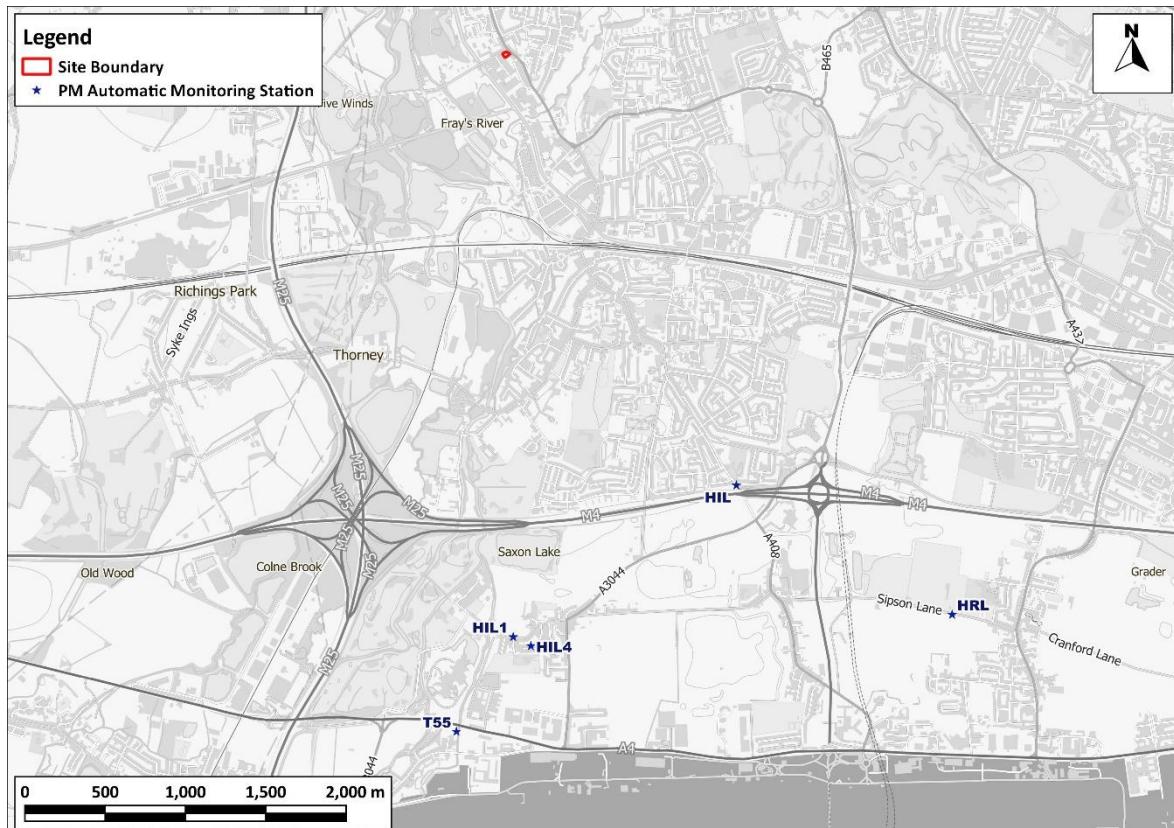
**Table 3: Summary of Annual Mean PM<sub>10</sub> and PM<sub>2.5</sub> Monitoring (µg/m<sup>3</sup>)**

Site ID	Site Type	Location	2016	2017	2018	2019	2020	2021	2022
<b>PM<sub>10</sub></b>									
HIL	Urban Background	London Hillingdon	-	-	-	-	-	-	14
HIL1	Roadside	London Harmondsworth	23	23	18	15	16	14	16
HIL4	Urban Background	London Harmondsworth Osiris	16	14	16	14	15	13	14
T55	Airport	Heathrow Green Gates	14	13	14	13	12	12	13
HRL	Airport	London Harlington	15	15	15	15	14	13	13
<b>Objective</b>			<b>40</b>						
<b>PM<sub>2.5</sub></b>									
HIL	Urban Background	London Hillingdon	-	-	-	-	-	-	7
HIL4	Urban Background	London Harmondsworth Osiris	6	7	6	5	7	6	7
T55	Airport	Heathrow Green Gates	10	8	7	8	7	7	8
HRL	Airport	London Harlington	10	9	9	10	8	8	8
<b>Objective/WHO guideline</b>			<b>20/10 <sup>a</sup></b>						

<sup>a</sup> The 20 µg/m<sup>3</sup> PM<sub>2.5</sub> objective is not in Regulations and there is no requirement for local authorities to meet it. 10 µg/m<sup>3</sup> is the WHO guideline for annual mean PM<sub>2.5</sub>; again, there is no requirement for local authorities to meet this.

**Table 4: Number of Days with PM<sub>10</sub> Concentrations Above 50 µg/m<sup>3</sup>**

Site ID	Site Type	Location	2016	2017	2018	2019	2020	2021	2022
<b>HIL</b>	Urban Background	London Hillingdon	-	-	-	-	-	-	0
<b>HIL1</b>	Roadside	London Harmondsworth	4	6	1	0	0	0	0
<b>HIL4</b>	Urban Background	London Harmondsworth Osiris	0	1	0	1	0	0	0
<b>T55</b>	Airport	Heathrow Green Gates	3	3	1	4	0	0	2
<b>HRL</b>	Airport	London Harlington	5	3	1	6	1	0	2
<b>Objective</b>			<b>35</b>						

**Figure 3: PM<sub>10</sub> and PM<sub>2.5</sub> Monitoring Locations**

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5.11 As shown In Tables 3 and 4, concentrations at all three sites were well below the objectives. In addition, as shown in Table 3, the WHO PM<sub>2.5</sub> guideline of 10 µg/m<sup>3</sup> is met at all four monitors.

## Exceedances of Limit Value

5.12 There are several AURN monitoring sites within the Greater London Urban Area that have measured exceedances of the annual mean nitrogen dioxide limit value (Defra, 2024d). Furthermore, Defra's roadside annual mean nitrogen dioxide concentrations (Defra, 2024c), which are used to identify and report exceedances of the limit value, identify exceedances of this limit value in 2019 along many roads in London but not for the roads close to the proposed development. The Greater London Urban Area has thus been reported as exceeding the limit value for annual mean nitrogen dioxide concentrations. Defra's predicted concentrations for 2024 (Defra, 2020) also do not identify any exceedances within 1 km of the application site. As such, there is considered to be no risk of a limit value exceedance in the vicinity of the proposed development by the time that it is operational.

5.13 Defra's Air Quality Plan requires the GLA to prepare an action plan that will "*deliver compliance in the shortest time possible*", and the 2015 Plan assumed that a CAZ was required. The GLA has already implemented a Low Emission Zone (LEZ) and an Ultra Low Emission Zone (ULEZ), thus the authority has effectively already implemented the required CAZ. These have been implemented as part of a package of measures including 12 Low Emission Bus Zones, Low Emission Neighbourhoods, the phasing out of diesel buses and taxis and other measures within the Mayor's Transport Strategy.

## Background Concentrations

5.14 Estimated background concentrations at the proposed development are set out in Table 5 and are all well below the objectives. The PM<sub>2.5</sub> concentrations do, however, marginally exceed the guideline concentration.

**Table 5: Estimated Annual Mean Background Pollutant Concentrations in 2022 and 2024 (µg/m<sup>3</sup>)**

Year	NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
2022	16.8	16.0	10.7
2024	15.6	15.6	10.4
Objective / WHO Guideline	40	40	20/10 <sup>a</sup>

<sup>a</sup> The 20 µg/m<sup>3</sup> PM<sub>2.5</sub> objective is not in Regulations and there is no requirement for local authorities to meet it. 10 µg/m<sup>3</sup> is the WHO guideline for annual mean PM<sub>2.5</sub>; again, there is no requirement for local authorities to meet this.

## 6 Construction Phase Impact Assessment

### Construction Traffic

6.1 The precise number of construction vehicles is not currently known, however, based on the size of the site it is anticipated that the construction phase will not generate more than 25 additional heavy vehicle movements per day on local roads. As this is below the screening criterion (25 HDVs) recommended by EPUK/IAQM guidance for within an AQMA (Moorcroft and Barrowcliffe et al, 2017), the impacts of traffic emissions during the construction phase have not been considered further.

### On-Site Exhaust Emissions

6.2 The IAQM guidance (IAQM, 2024) states:

*"Experience of assessing the exhaust emissions from on-site plant (also known as non-road mobile machinery or NRMM) and site traffic suggests that they are unlikely to make a significant impact on local air quality, and in the vast majority of cases they will not need to be quantitatively assessed. For site plant and on-site traffic, consideration should be given to the number of plant/vehicles and their operating hours and locations to assess whether a significant effect is likely to occur".*

6.3 Any NRMM operated on site will comply with the Stage IIIB emission limit set out in European Union Directive 97/68/EC (The European Parliament and the Council of the European Union, 1997) and its subsequent amendments. Thus, effects associated with NRMM emissions are screened out as being not significant.

### Construction Dust and Particulate Matter Emissions

6.4 The construction works will give rise to a risk of dust impacts during demolition, earthworks and construction, as well as from trackout of dust and dirt by vehicles onto the public highway. Step 1 of the assessment procedure is to screen the need for a detailed assessment. There are receptors within the distances set out in the guidance (see Appendix A2), thus a detailed assessment is required. The following section sets out Step 2 of the assessment procedure.

#### Potential Dust Emission Magnitude

##### Demolition

6.5 The existing public house on site, with an approximate volume of 1,500 m<sup>3</sup> will be demolished.

6.6 Based on the example definitions set out in Table A2.1 in Appendix A2, the dust emission class for demolition is considered to be *small*.

## Earthworks

6.7 The characteristics of the soil at the site have been defined using the British Geological Survey's UK Soil Observatory website (British Geological Survey, 2024), as set out in Table 6. Overall, it is considered that, when dry, this soil has the potential to be highly dusty.

**Table 6: Summary of Soil Characteristics**

Category	Record
Soil Layer Thickness	Deep
Soil Parent Material Grain Size	Argillaceous <sup>a</sup>
European Soil Bureau Description	Residual Clay and Loamy Loess
Soil Group	Medium to Light (Silty) to Heavy
Soil Texture	Silt to Silty Loam <sup>b</sup>

<sup>a</sup> grain size < 0.06 mm.

<sup>b</sup> a loam is composed mostly of sand and silt.

6.8 The site covers some 1,000 m<sup>2</sup> and most of this will be subject to earthworks, involving removal of the foundations of the demolished buildings and breaking up of a paved area. Dust will arise mainly from vehicles travelling over unpaved ground and from the handling of dusty materials (such as dry soil).

6.9 Based on the example definitions set out in Table A2.1 in Appendix A2, the dust emission class for earthworks is considered to be *small*.

## Construction

6.10 Construction will involve erecting a three-storey building; whilst the exact total building volume is unknown, it is likely with a total building volume of around 5,500 m<sup>3</sup>. Dust will arise from vehicles travelling over unpaved ground, the handling and storage of dusty materials, and from the cutting of concrete.

6.11 Based on the example definitions set out in Table A2.1 in Appendix A2, the dust emission class for construction is considered to be *small*.

## Trackout

6.12 The number of heavy vehicles accessing the site, which may track out dust and dirt, is currently unknown, but given the size of the site it is likely that there will be no more than 20-50 outward heavy vehicle movements per day.

6.13 Based on the example definitions set out in Table A2.1 in Appendix A2, the dust emission class for trackout is considered to be *medium*.

6.14 Table 7 summarises the dust emission magnitude for the proposed development.

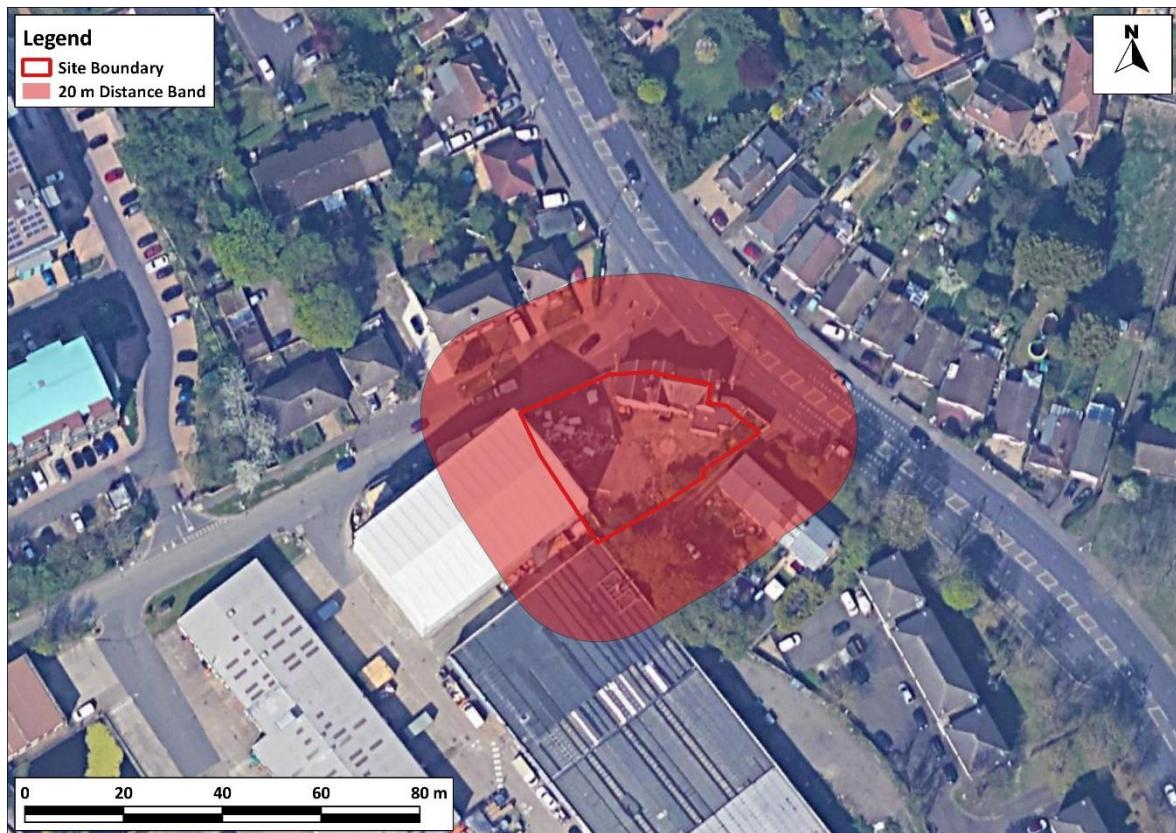
**Table 7: Summary of Dust Emission Magnitude**

Source	Dust Emission Magnitude
Demolition	Small
Earthworks	Small
Construction	Small
Trackout	Medium

### ***Sensitivity of the Area***

6.15 This assessment step combines the sensitivity of individual receptors to dust effects with the number of receptors in the area and their proximity to the site. It also considers additional site-specific factors such as topography and screening, and in the case of sensitivity to human health effects, baseline PM<sub>10</sub> concentrations.

6.16 The IAQM guidance, upon which the GLA's guidance is based, explains that residential properties are 'high' sensitivity receptors to dust soiling (Table A2.2 in Appendix A2). Residential properties are also classified as being of 'high' sensitivity to human health effects, while places of work are classified as being of 'medium' sensitivity. There are approximately 26 residential properties within 20 m of the site, this includes the permitted development of Packet Boat House directly west of the Site which will include 41 residential units (see Figure 4).



**Figure 4: 20 Distance Band around Site Boundary**

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6.17 The IAQM guidance (2024) explains that there is a risk of material being tracked 250 m from the site exit. Since it is not known which roads construction vehicles will use, it has been assumed that all possible routes could be affected. There are between 60 and 100 properties within 20 m of the roads along which material could be tracked (see Figure 5).



**Figure 5: 20 m Distance Band around Roads Used by Construction Traffic Within 250 m of the Site Exit**

Imagery ©2024 Google. Imagery ©Bluesky, Getmapping plc, Infoterra Ltd & Bluesky, Maxar Technologies, The GeoInformation Group.

#### Sensitivity of the Area to Effects from Dust Soiling

6.18 Using the information set out in Paragraph 6.16 and Figure 4 alongside the matrix set out in Table A2.3 in Appendix A2, the area surrounding the onsite works is of 'high' sensitivity to dust soiling. Using the information set out in Paragraph 6.17 and Figure 5 alongside the same matrix, the area is also of 'high' sensitivity to dust soiling due to trackout.

#### Sensitivity of the Area to any Human Health Effects

6.19 The matrix in Table A2.4 in Appendix A2 requires information on the baseline annual mean  $PM_{10}$  concentration in the area. Based on  $PM_{10}$  measurements presented in Table 3, it is likely that baseline  $PM_{10}$  concentrations in the area are below  $24 \mu\text{g}/\text{m}^3$ .

6.20 Using the information set out in Paragraphs 6.16 and Figure 4 alongside the matrix in Table A2.4 in Appendix A2, the area surrounding the onsite works is of 'low' sensitivity to human health effects. Using the information set out in Paragraph 6.17 and Figure 5 alongside the same matrix, the area surrounding roads along which material may be tracked from the site is also of 'low' sensitivity.

### Sensitivity of the Area to any Ecological Effects

6.21 The guidance only considers designated ecological sites within 50 m to have the potential to be impacted by the construction works. There are no designated ecological sites within 50 m of the site boundary or those roads along which material may be tracked, thus ecological impacts will not be considered further.

### Summary of the Area Sensitivity

6.22 Table 8 summarises the sensitivity of the area around the proposed construction works.

**Table 8: Summary of the Area Sensitivity**

Effects Associated With:	Sensitivity of the Surrounding Area	
	On-site Works	Trackout
Dust Soiling	High Sensitivity	High Sensitivity
Human Health	Low Sensitivity	Low Sensitivity

### Risk and Significance

6.23 The dust emission magnitudes in Table 7 have been combined with the sensitivities of the area in Table 8 using the matrix in Table A2.6 in Appendix A2, in order to assign a risk category to each activity. The resulting risk categories for the four construction activities, without mitigation, are set out in Table 9. These risk categories have been used to determine the appropriate level of mitigation as set out in Section 9 (Step 3 of the assessment procedure).

**Table 9: Summary of Risk of Impacts Without Mitigation**

Source	Dust Soiling	Human Health
Demolition	Medium Risk	Negligible
Earthworks	Low Risk	Negligible
Construction	Low Risk	Negligible
Trackout	Medium Risk	Low Risk

6.24 The IAQM guidance does not provide a method for assessing the significance of effects before mitigation, and advises that pre-mitigation significance should not be determined. With appropriate mitigation in place, the IAQM guidance is clear that the residual effect will normally be 'not significant' (IAQM, 2024).

## 7 Impact Assessment

### Impacts at Existing Receptors

- 7.1 The proposed development is expected to generate a total of 61 vehicle trips, consisting of 60 daily LDV trips (of which 10 will be by motorcycles and 50 by vans) and one daily HDV trip. These daily trip rates are anticipated to be already on the existing network and relate to deliveries and servicing of the proposed development.
- 7.2 The number of vehicles are below the screening threshold of 100 LDVs and 25 HDVs recommended for use within an AQMA in the EPUK/IAQM guidance (Moorcroft and Barrowcliffe et al, 2017) (see Paragraph 3.16). As such, it is judged that the relevant screening thresholds will not be exceeded and there is no requirement for a detailed assessment of road traffic impacts at existing receptors; it can be concluded that the proposed development will not have a significant effect on local roadside air quality.
- 7.3 In addition, heat and hot water for the proposed development will be provided by air source heat pumps, which have no emission to air. As such the proposed development will therefore have a negligible impact on local air quality.

### Impacts of Existing Sources on Future Residents of the Development

- 7.4 As discussed in Section 5, the proposed development is located 8 m away from the A408, in an area where pollutant concentrations are expected to be below the relevant air quality objectives. In addition, background concentrations at the site are well below the objectives (see Table 5).
- 7.5 The design of the proposed development has considered air quality and includes landscape planting (green infrastructure) along the A408 to act as a buffer from vehicle emissions, as well as amenity space to the rear of the development away from vehicle emissions. Therefore, it is considered future residents will experience acceptable air quality.

### Significance of Operational Air Quality Effects

The operational air quality effects without mitigation are judged to be 'not significant'. This professional judgement is made in accordance with the methodology set out in Appendix A3, and takes account of the assessment that:

- pollutant concentrations within the proposed development will all be below the objectives, thus future residents will experience acceptable air quality;
- the trip generation of the proposed development will be below the published EPUK/IAQM screening criteria, and thus the effect of vehicle emissions can be screened out as 'not significant'; and

- the proposed development does not include any combustion plant, as such the proposed development will have a negligible impact on local air quality.

## 8 ‘Air Quality Neutral’

8.1 The purpose of the London Plan’s requirement that development proposals be ‘air quality neutral’ is to prevent the gradual deterioration of air quality throughout Greater London. The ‘air quality neutrality’ of a proposed development, as assessed in this section, does not directly indicate the potential of the proposed development to have significant impacts on human health (this has been assessed separately in the previous section). The air quality neutral assessment has been undertaken using the latest GLA’s London Plan Guidance (Air Quality Neutral) (GLA, 2023a).

### Building Emissions

8.2 The proposed development does not include any combustion plant for the routine provision of electricity, heating or hot water and will thus have no direct building emissions. It is, therefore, air quality neutral in terms of building emissions.

### Road Transport Emissions

8.3 In terms of transport emissions Paragraph 4.1.2 of the guidance states “*where major developments meet the definition of ‘car-free’ they can be assumed to meet the TEB*”.

8.4 The proposals will be car-free and will not provide any car parking; the proposed development is thus air quality neutral in terms of transport emissions.

### Summary

8.5 The proposed development complies with the requirement that all new developments in London should be at least air quality neutral.

## 9 Mitigation

### Good Design and Best Practice

9.1 The EPUK/IAQM guidance advises that good design and best practice measures should be considered, whether or not more specific mitigation is required. The proposed development incorporates the following good design and best practice measures, which have been accounted for in the assessment as far as is possible:

- adoption of a Dust Management Plan (DMP) or Construction Environmental Management Plan (CEMP) to minimise the environmental impacts of the construction works;
- car-free development, with no car parking spaces, to discourage the use of private vehicles to access the proposed development;
- provision of pedestrian and cycle access to the new development, including cycle parking (80 spaces);
- green infrastructure provided along the A408 to act as a buffer to the proposed development from traffic emissions;
- courtyard amenity space at the rear of the proposed development, away from vehicle emissions; and
- use of air-source heating to avoid the need for on-site combustion;

### Recommended Mitigation

#### Construction Impacts

9.2 Measures to mitigate dust emissions will be required during the construction phase of the development in order to minimise effects upon nearby sensitive receptors.

9.3 The site has been identified as a *Medium* Risk site during demolition and trackout, and *Low* Risk during earthworks and construction, as set out in Table 9. The GLA's SPG on *The Control of Dust and Emissions During Construction and Demolition* (GLA, 2014) describes measures that should be employed, as appropriate, to reduce the impacts, along with guidance on what monitoring should be undertaken during the construction phase. This reflects best practice experience and has been used, together with the professional experience of the consultant who has undertaken the dust impact assessment and the findings of the assessment, to draw up a set of measures that should be incorporated into the specification for the works. These measures are described in Appendix A5.

9.4 The mitigation measures should be written into a DMP. The DMP may be integrated into a Code of Construction Practice or the Construction Environmental Management Plan, and may require monitoring. The GLA's guidance suggests that, for a Medium Risk site, automatic monitoring of particulate matter (as PM<sub>10</sub>) will be required. It also states that, on certain sites, it may be appropriate

to determine the existing (baseline) pollution levels before work begins. However, the guidance is clear that the Local Authority should advise as to the appropriate air quality monitoring procedure and timescale on a case-by-case basis.

9.5 Where mitigation measures rely on water, it is expected that only sufficient water will be applied to damp down the material. There should not be any excess to potentially contaminate local watercourses.

### ***Road Traffic Impacts***

9.6 The assessment has demonstrated that the overall air quality effect of the proposed development will be 'not significant'; it will not introduce any new exposure into areas of unacceptable air quality, nor will the development-generated traffic emissions have a significant effect on local air quality. It is, therefore, not considered appropriate to propose mitigation measures for this development.

9.7 Measures to reduce pollutant emissions from road traffic are principally being delivered in the longer term by the introduction of more stringent emissions standards, largely via European legislation (which is written into UK law).

## 10 Conclusions

10.1 The assessment has considered the impacts of the proposed development on local air quality in terms of dust and particulate matter emissions during construction and emissions from road traffic generated by the completed and occupied development. It has also identified the air quality conditions that future residents will experience and whether or not the proposed development is air quality neutral (as required by the London Plan).

### Construction Impacts

10.2 The construction works have the potential to create dust. During construction it will therefore be necessary to apply a package of mitigation measures to minimise dust emissions. Appropriate measures have been recommended and, with these measures in place, it is expected that any residual effects will be 'not significant'.

### Operational Impacts

10.3 Air quality conditions for future residents of the proposed development have been shown to be acceptable, with concentrations well below the air quality objectives.

10.4 Development-generated traffic flows on the local road network will be below published screening criteria, hence it will not have a significant impact on local roadside air quality.

10.5 Heat and hot water for the proposed development will be provided by air source heat pumps, which have no emissions to air. The proposed development will therefore have a negligible impact on local air quality.

10.6 Since air quality conditions for future residents will be acceptable, there is no requirement for mitigation for the proposed development. The proposed development has implemented good design and best practice measures to minimise its impact on the local area.

10.7 The overall operational air quality effects of the proposed development are judged to be 'not significant'.

### Policy Implications

10.8 Taking into account these conclusions, it is judged that the proposed development is consistent with Paragraph 191 of the NPPF, being appropriate for its location both in terms of its effects on the local air quality environment and the air quality conditions for future residents. It is also consistent with Paragraph 192, as it will not affect compliance with relevant limit values or national objectives.

10.9 The proposed development is compliant with Policy SI 1 of the London Plan in the following ways:

- It will not lead to further deterioration of existing poor air quality;

- It will not cause or extend any exceedances of legal air quality limits;
- It will not create new exposure to poor air quality; and
- It is air quality neutral.

10.10 The proposed development is also consistent with Policy DME1 14 of LBH's Local Plan, as it will:

- be at least 'air quality neutral';
- include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
- actively contribute towards the improvement of air quality by including a car-free development and no combustion plant.

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## 12 Glossary

<b>AADT</b>	Annual Average Daily Traffic
<b>AQC</b>	Air Quality Consultants
<b>AQMA</b>	Air Quality Management Area
<b>AURN</b>	Automatic Urban and Rural Network
<b>BEB</b>	Building Emissions Benchmark
<b>CAZ</b>	Clean Air Zone
<b>CEMP</b>	Construction Environmental Management Plan
<b>CHP</b>	Combined Heat and Power
<b>Defra</b>	Department for Environment, Food and Rural Affairs
<b>DfT</b>	Department for Transport
<b>DMP</b>	Dust Management Plan
<b>EFT</b>	Emission Factor Toolkit
<b>EPUK</b>	Environmental Protection UK
<b>EU</b>	European Union
<b>EV</b>	Electric Vehicle
<b>Exceedance</b>	A period of time when the concentration of a pollutant is greater than the appropriate air quality objective. This applies to specified locations with relevant exposure
<b>Focus Area</b>	Location that not only exceeds the annual mean limit value for NO <sub>2</sub> but also has a high level of human exposure
<b>GLA</b>	Greater London Authority
<b>HDV</b>	Heavy Duty Vehicles (> 3.5 tonnes)
<b>HGV</b>	Heavy Goods Vehicle
<b>HMSO</b>	Her Majesty's Stationery Office
<b>IAQM</b>	Institute of Air Quality Management
<b>JAQU</b>	Joint Air Quality Unit
<b>LAEI</b>	London Atmospheric Emissions Inventory
<b>LAQM</b>	Local Air Quality Management
<b>LBH</b>	London Borough of Hillingdon

<b>LDV</b>	Light Duty Vehicles (<3.5 tonnes)
<b>LEZ</b>	Low Emission Zone
<b>LGV</b>	Light Goods Vehicle
<b>µg/m<sup>3</sup></b>	Microgrammes per cubic metre
<b>NO</b>	Nitric oxide
<b>NO<sub>2</sub></b>	Nitrogen dioxide
<b>NOx</b>	Nitrogen oxides (taken to be NO <sub>2</sub> + NO)
<b>NPPF</b>	National Planning Policy Framework
<b>NRMM</b>	Non-road Mobile Machinery
<b>Objectives</b>	A nationally defined set of health-based concentrations for nine pollutants, seven of which are incorporated in Regulations, setting out the extent to which the standards should be achieved by a defined date. There are also vegetation-based objectives for sulphur dioxide and nitrogen oxides
<b>OLEV</b>	Office for Low Emission Vehicles
<b>PHV</b>	Private Hire Vehicle
<b>PM<sub>10</sub></b>	Small airborne particles, more specifically particulate matter less than 10 micrometres in aerodynamic diameter
<b>PM<sub>2.5</sub></b>	Small airborne particles less than 2.5 micrometres in aerodynamic diameter
<b>PPG</b>	Planning Practice Guidance
<b>PPW</b>	Planning Policy Wales
<b>RDE</b>	Real Driving Emissions
<b>SCR</b>	Selective Catalytic Reduction
<b>SPG</b>	Supplementary Planning Guidance
<b>SPD</b>	Supplementary Planning Document
<b>Standards</b>	A nationally defined set of concentrations for nine pollutants below which health effects do not occur or are minimal
<b>TEA</b>	Triethanolamine – used to absorb nitrogen dioxide
<b>TEB</b>	Transport Emissions Benchmark
<b>TfL</b>	Transport for London
<b>TRAVL</b>	Trip Rate Assessment Valid for London

<b>ULEZ</b>	Ultra Low Emission Zone
<b>WHO</b>	World Health Organisation
<b>ZEC</b>	Zero Emission Capable

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## A1 London-Specific Policies and Measures

### ***Development Plans***

A1.1 Policy SI 1 of the London Plan (GLA, 2021) states the following regarding strategic development plans:

*Development Plans, through relevant strategic, site-specific and area-based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.*

### ***Electric Vehicle Charging***

A1.2 To support the uptake of zero tailpipe emission vehicles, Policy T6.1 of the London Plan states:

*"All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces".*

### ***London Environment Strategy***

A1.3 The air quality chapter of the London Environment Strategy sets out three main objectives, each of which is supported by sub-policies and proposals. The Objectives and their sub-policies are set out below:

*"Objective 4.1: Support and empower London and its communities, particularly the most disadvantaged and those in priority locations, to reduce their exposure to poor air quality.*

- *Policy 4.1.1 Make sure that London and its communities, particularly the most disadvantaged and those in priority locations, are empowered to reduce their exposure to poor air quality*
- *Policy 4.1.2 Improve the understanding of air quality health impacts to better target policies and action*

*Objective 4.2: Achieve legal compliance with UK and EU limits as soon as possible, including by mobilising action from London Boroughs, government and other partners*

- *Policy 4.2.1 Reduce emissions from London's road transport network by phasing out fossil fuelled vehicles, prioritising action on diesel, and enabling Londoners to switch to more sustainable forms of transport*
- *Policy 4.2.2 Reduce emissions from non-road transport sources, including by phasing out fossil fuels*
- *Policy 4.2.3 Reduce emissions from non-transport sources, including by phasing out fossil fuels*

- *Policy 4.2.4 The Mayor will work with the government, the London boroughs and other partners to accelerate the achievement of legal limits in Greater London and improve air quality*
- *Policy 4.2.5 The Mayor will work with other cities (here and internationally), global city and industry networks to share best practice, lead action and support evidence based steps to improve air quality*

*Objective 4.3: Establish and achieve new, tighter air quality targets for a cleaner London by transitioning to a zero emission London by 2050, meeting world health organization health-based guidelines for air quality*

- *Policy 4.3.1 The Mayor will establish new targets for PM<sub>2.5</sub> and other pollutants where needed. The Mayor will seek to meet these targets as soon as possible, working with government and other partners*
- *Policy 4.3.2 The Mayor will encourage the take up of ultra low and zero emission technologies to make sure London's entire transport system is zero emission by 2050 to further reduce levels of pollution and achieve WHO air quality guidelines*
- *Policy 4.3.3 Phase out the use of fossil fuels to heat, cool and maintain London's buildings, homes and urban spaces, and reduce the impact of building emissions on air quality*
- *Policy 4.3.4 Work to reduce exposure to indoor air pollutants in the home, schools, workplace and other enclosed spaces"*

A1.4 While the policies targeting transport sources are significant, there are less obvious ones that will also require significant change. In particular, the aim to phase out fossil-fuels from building heating and cooling and from NRMM will demand a dramatic transition.

## Low Emission Zone (LEZ)

A1.5 The LEZ was implemented as a key measure to improve air quality in Greater London. It entails charges for vehicles entering Greater London not meeting certain emissions criteria, and affects diesel-engined lorries, buses, coaches, large vans, minibuses and other specialist vehicles derived from lorries and vans. Since 1 March 2021, a standard of Euro VI has applied for HGVs, buses and coaches, while a standard of Euro 3 has applied for large vans, minibuses and other specialist diesel vehicles since 2012.

## Ultra Low Emission Zone (ULEZ)

A1.6 London's Ultra-Low Emission Zone (ULEZ), originally covering the congestion charge zone, came into force in April 2019, and was expanded outward to the North and South Circular Roads in October 2021. The ULEZ was expanded again to cover all London Boroughs (excluding the M25) at the end

of August 2023. . The ULEZ currently operates 24 hours a day, 7 days a week. All cars, motorcycles, vans and minibuses are required to meet exhaust emission standards (ULEZ standards) or pay an additional daily charge to travel within the zone. The ULEZ standards are Euro 3 for motorcycles, Euro 4 for petrol cars, vans and minibuses and Euro 6 for diesel cars, vans and minibuses. The ULEZ does not include any requirements relating to heavy vehicle (HGV, coach and bus) emissions, as these are addressed by the amendments to the LEZ described in Paragraph A1.5.

## Other Measures

A1.7 Since 2018, all taxis presented for licencing for the first time had to be zero emission capable (ZEC). This means they must be able to travel a certain distance in a mode which produces no air pollutants, and all private hire vehicles (PHVs) presented for licensing for the first time had to meet Euro 6 emissions standards. Since January 2020, all newly manufactured PHVs presented for licensing for the first time had to be ZEC (with a minimum zero emission range of 10 miles). The Mayor's aim is that the entire taxi and PHV fleet will be made up of ZEC vehicles by 2033.

A1.8 The Mayor has also proposed to make sure that TfL leads by example by cleaning up its bus fleet, implementing the following measures:

- TfL will procure only hybrid or zero emission double-decker buses from 2018;
- a commitment to providing 3,100 double decker hybrid buses by 2019 and 300 zero emission single-deck buses in central London by 2020;
- introducing 12 Low Emission Bus Zones by 2020;
- investing £50m in Bus Priority Schemes across London to reduce engine idling; and
- retrofitting older buses to reduce emissions (selective catalytic reduction (SCR) technology has already been fitted to 1,800 buses, cutting their NOx emissions by around 88%).

## A2 Construction Dust Assessment Procedure

A2.1 The criteria developed by IAQM (2024), upon which the GLA's guidance is based, divide the activities on construction sites into four types to reflect their different potential impacts. These are:

- demolition;
- earthworks;
- construction; and
- trackout.

A2.2 The assessment procedure includes the four steps summarised below:

### STEP 1: Screen the Need for a Detailed Assessment

A2.3 An assessment is required where there is a human receptor within 250 m of the boundary of the site and/or within 50 m of the route(s) used by construction vehicles on the public highway, up to 250 m from the site entrance(s), or where there is an ecological receptor within 50 m of the boundary of the site and/or within 50 m of the route(s) used by construction vehicles on the public highway, up to 250 m from the site entrance(s).

A2.4 Where the need for a more detailed assessment is screened out, it can be concluded that the level of risk is *negligible* and that any effects will be 'not significant'. No mitigation measures beyond those required by legislation will be required.

### STEP 2: Assess the Risk of Dust Impacts

A2.5 A site is allocated to a risk category based on two factors:

- the scale and nature of the works, which determines the potential dust emission magnitude (Step 2A); and
- the sensitivity of the area to dust effects (Step 2B).

A2.6 These two factors are combined in Step 2C, which is to determine the risk of dust impacts with no mitigation applied. The risk categories assigned to the site may be different for each of the four potential sources of dust (demolition, earthworks, construction and trackout).

#### Step 2A – Define the Potential Dust Emission Magnitude

A2.7 Dust emission magnitude is defined as either 'Small', 'Medium', or 'Large'. The IAQM guidance explains that this classification should be based on professional judgement, but provides the examples in Table A2.1.

**Table A2.1: Examples of How the Dust Emission Magnitude Class May be Defined**

Class	Examples
<b>Demolition</b>	
<b>Large</b>	Total building volume >75,000 m <sup>3</sup> , potentially dusty construction material (e.g. concrete), on site crushing and screening, demolition activities >12 m above ground level
<b>Medium</b>	Total building volume 12,000 m <sup>3</sup> – 75,000 m <sup>3</sup> , potentially dusty construction material, demolition activities 6-12 m above ground level
<b>Small</b>	Total building volume <12,000 m <sup>3</sup> , construction material with low potential for dust release (e.g. metal cladding or timber), demolition activities <6 m above ground, demolition during wetter months
<b>Earthworks</b>	
<b>Large</b>	Total site area >110,000 m <sup>2</sup> , potentially dusty soil type (e.g. clay, which will be prone to suspension when dry due to small particle size), >10 heavy earth moving vehicles active at any one time, formation of bunds >6 m in height.
<b>Medium</b>	Total site area 18,000 m <sup>2</sup> – 110,000 m <sup>2</sup> , moderately dusty soil type (e.g. silt), 5-10 heavy earth moving vehicles active at any one time, formation of bunds 3 m – 6 m in height.
<b>Small</b>	Total site area <18,000 m <sup>2</sup> , soil type with large grain size (e.g. sand), <5 heavy earth moving vehicles active at any one time, formation of bunds <3 m in height.
<b>Construction</b>	
<b>Large</b>	Total building volume >75,000 m <sup>3</sup> , on site concrete batching; sandblasting
<b>Medium</b>	Total building volume 12,000 m <sup>3</sup> – 75,000 m <sup>3</sup> , potentially dusty construction material (e.g. concrete), on site concrete batching
<b>Small</b>	Total building volume <12,000 m <sup>3</sup> , construction material with low potential for dust release (e.g. metal cladding or timber)
<b>Trackout <sup>a</sup></b>	
<b>Large</b>	>50 HDV (>3.5t) outward movements in any one day, potentially dusty surface material (e.g. high clay content), unpaved road length >100 m
<b>Medium</b>	20-50 HDV (>3.5t) outward movements in any one day, moderately dusty surface material (e.g. high clay content), unpaved road length 50 m – 100 m
<b>Small</b>	<20 HDV (>3.5t) outward movements in any one day, surface material with low potential for dust release, unpaved road length <50 m

<sup>a</sup> These numbers are for vehicles that leave the site after moving over unpaved ground.

### Step 2B – Define the Sensitivity of the Area

A2.8 The sensitivity of the area is defined taking account of a number of factors:

- the specific sensitivities of receptors in the area;
- the proximity and number of those receptors;
- in the case of PM<sub>10</sub>, the local background concentration; and
- site-specific factors, such as whether there are natural shelters to reduce the risk of wind-blown dust.

A2.9 The first requirement is to determine the specific sensitivities of local receptors. The IAQM guidance recommends that this should be based on professional judgment, taking account of the principles in

Table A2.2. These receptor sensitivities are then used in the matrices set out in Table A2.3, Table A2.4 and Table A2.5 to determine the sensitivity of the area. Finally, the sensitivity of the area is considered in relation to any other site-specific factors, such as the presence of natural shelters etc., and any required adjustments to the defined sensitivities are made.

### **Step 2C – Define the Risk of Impacts**

A2.10 The dust emission magnitude determined at Step 2A is combined with the sensitivity of the area determined at Step 2B to determine the *risk* of impacts with no mitigation applied. The IAQM guidance provides the matrix in Table A2.6 as a method of assigning the level of risk for each activity.

## **STEP 3: Determine Site-specific Mitigation Requirements**

A2.11 The IAQM guidance provides a suite of recommended and desirable mitigation measures which are organised according to whether the outcome of Step 2 indicates a low, medium, or high risk. The list provided in the IAQM guidance has been used as the basis for the requirements set out in Appendix A5.

## **STEP 4: Determine Significant Effects**

A2.12 The IAQM guidance does not provide a method for assessing the significance of effects before mitigation, and advises that pre-mitigation significance should not be determined. With appropriate mitigation in place, the IAQM guidance is clear that the residual effect will normally be 'not significant'.

A2.13 The IAQM guidance recognises that, even with a rigorous dust management plan in place, it is not possible to guarantee that the dust mitigation measures will be effective all of the time, for instance under adverse weather conditions. The local community may therefore experience occasional, short-term dust annoyance. The scale of this would not normally be considered sufficient to change the conclusion that the effects will be 'not significant'.

**Table A2.2: Principles to be Used When Defining Receptor Sensitivities**

Class	Principles	Examples
<b>Sensitivities of People to Dust Soiling Effects</b>		
<b>High</b>	<p>users can reasonably expect enjoyment of a high level of amenity; or</p> <p>the appearance, aesthetics or value of their property would be diminished by soiling; and</p> <p>the people or property would reasonably be expected to be present continuously, or at least regularly for extended periods, as part of the normal pattern of use of the land</p>	dwellings, museum and other culturally important collections, medium- and long-term car parks and car showrooms
<b>Medium</b>	<p>users would expect to enjoy a reasonable level of amenity, but would not reasonably expect to enjoy the same level of amenity as in their home; or</p> <p>the appearance, aesthetics or value of their property could be diminished by soiling; or</p> <p>the people or property wouldn't reasonably be expected to be present here continuously or regularly for extended periods as part of the normal pattern of use of the land</p>	parks and places of work
<b>Low</b>	<p>the enjoyment of amenity would not reasonably be expected; or</p> <p>there is property that would not reasonably be expected to be diminished in appearance, aesthetics or value by soiling; or</p> <p>there is transient exposure, where the people or property would reasonably be expected to be present only for limited periods of time as part of the normal pattern of use of the land</p>	playing fields, farmland (unless commercially-sensitive horticulture), footpaths, short term car parks and roads
<b>Sensitivities of People to the Health Effects of PM<sub>10</sub></b>		
<b>High</b>	locations where members of the public may be exposed for eight hours or more in a day	residential properties, hospitals, schools and residential care homes
<b>Medium</b>	locations where the people exposed are workers, and where individuals may be exposed for eight hours or more in a day.	may include office and shop workers, but will generally not include workers occupationally exposed to PM <sub>10</sub>
<b>Low</b>	locations where human exposure is transient	public footpaths, playing fields, parks and shopping streets
<b>Sensitivities of Receptors to Ecological Effects</b>		
<b>High</b>	<p>locations with an international or national designation and the designated features may be affected by dust soiling; or</p> <p>locations where there is a community of a particularly dust sensitive species</p>	Special Areas of Conservation with dust sensitive features
<b>Medium</b>	<p>locations where there is a particularly important plant species, where its dust sensitivity is uncertain or unknown; or</p> <p>locations with a national designation where the features may be affected by dust deposition</p>	Sites of Special Scientific Interest with dust sensitive features
<b>Low</b>	locations with a local designation where the features may be affected by dust deposition	Local Nature Reserves with dust sensitive features

Table A2.3: Sensitivity of the Area to Dust Soiling Effects on People and Property <sup>6</sup>

Receptor Sensitivity	Number of Receptors	Distance from the Source (m)			
		<20	<50	<100	<250
High	>100	High	High	Medium	Low
	10-100	High	Medium	Low	Low
	1-10	Medium	Low	Low	Low
Medium	>1	Medium	Low	Low	Low
Low	>1	Low	Low	Low	Low

Table A2.4: Sensitivity of the Area to Human Health Effects <sup>6</sup>

Receptor Sensitivity	Annual Mean PM <sub>10</sub>	Number of Receptors	Distance from the Source (m)			
			<20	<50	<100	<250
High	>32 µg/m <sup>3</sup>	>100	High	High	High	Medium
		10-100	High	High	Medium	Low
		1-10	High	Medium	Low	Low
	28-32 µg/m <sup>3</sup>	>100	High	High	Medium	Low
		10-100	High	Medium	Low	Low
		1-10	High	Medium	Low	Low
	24-28 µg/m <sup>3</sup>	>100	High	Medium	Low	Low
		10-100	High	Medium	Low	Low
		1-10	Medium	Low	Low	Low
	<24 µg/m <sup>3</sup>	>100	Medium	Low	Low	Low
		10-100	Low	Low	Low	Low
		1-10	Low	Low	Low	Low
Medium	>32 µg/m <sup>3</sup>	>10	High	Medium	Low	Low
		1-10	Medium	Low	Low	Low
	28-32 µg/m <sup>3</sup>	>10	Medium	Low	Low	Low
		1-10	Low	Low	Low	Low
	24-28 µg/m <sup>3</sup>	>10	Low	Low	Low	Low
		1-10	Low	Low	Low	Low
	<24 µg/m <sup>3</sup>	>10	Low	Low	Low	Low
		1-10	Low	Low	Low	Low
Low	-	>1	Low	Low	Low	Low

<sup>6</sup> For demolition, earthworks and construction, distances are taken either from the dust source or from the boundary of the site. For trackout, distances are measured from the sides of roads used by construction traffic. Without mitigation, trackout may occur from roads up to 250 m, as measured from the site exit. The impact declines with distance from the site, and it is only necessary to consider trackout impacts up to 50 m from the edge of the road.

**Table A2.5: Sensitivity of the Area to Ecological Effects<sup>6</sup>**

Receptor Sensitivity	Distance from the Source (m)	
	<20	<50
High	High	Medium
Medium	Medium	Low
Low	Low	Low

**Table A2.6: Defining the Risk of Dust Impacts**

Sensitivity of the Area	Dust Emission Magnitude		
	Large	Medium	Small
<b>Demolition</b>			
High	High Risk	Medium Risk	Medium Risk
Medium	High Risk	Medium Risk	Low Risk
Low	Medium Risk	Low Risk	Negligible
<b>Earthworks</b>			
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible
<b>Construction</b>			
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible
<b>Trackout</b>			
High	High Risk	Medium Risk	Low Risk
Medium	Medium Risk	Medium Risk	Low Risk
Low	Low Risk	Low Risk	Negligible

## A3 EPUK & IAQM Planning for Air Quality Guidance

A3.1 The guidance issued by EPUK and IAQM (Moorcroft and Barrowcliffe et al, 2017) is comprehensive in its explanation of the place of air quality in the planning regime. Key sections of the guidance not already mentioned above are set out below.

### Air Quality as a Material Consideration

*“Any air quality issue that relates to land use and its development is capable of being a material planning consideration. The weight, however, given to air quality in making a planning application decision, in addition to the policies in the local plan, will depend on such factors as:*

- *the severity of the impacts on air quality;*
- *the air quality in the area surrounding the proposed development;*
- *the likely use of the development, i.e. the length of time people are likely to be exposed at that location; and*
- *the positive benefits provided through other material considerations”.*

### Recommended Best Practice

A3.2 The guidance goes into detail on how all development proposals can and should adopt good design principles that reduce emissions and contribute to better air quality management. It states:

*“The basic concept is that good practice to reduce emissions and exposure is incorporated into all developments at the outset, at a scale commensurate with the emissions”.*

A3.3 The guidance sets out a number of good practice principles that should be applied to all developments that:

- include 10 or more dwellings;
- where the number of dwellings is not known, residential development is carried out on a site of more than 0.5 ha;
- provide more than 1,000 m<sup>2</sup> of commercial floorspace;
- are carried out on land of 1 ha or more.

A3.4 The good practice principles are that:

- New developments should not contravene the Council’s Air Quality Action Plan, or render any of the measures unworkable;
- Wherever possible, new developments should not create a new “street canyon”, as this inhibits pollution dispersion;

- Delivering sustainable development should be the key theme of any application;
- New development should be designed to minimise public exposure to pollution sources, e.g. by locating habitable rooms away from busy roads;
- The provision of at least 1 Electric Vehicle (EV) “rapid charge” point per 10 residential dwellings and/or 1000 m<sup>2</sup> of commercial floorspace. Where on-site parking is provided for residential dwellings, EV charging points for each parking space should be made available;
- Where development generates significant additional traffic, provision of a detailed travel plan (with provision to measure its implementation and effect) which sets out measures to encourage sustainable means of transport (public, cycling and walking) via subsidised or free-ticketing, improved links to bus stops, improved infrastructure and layouts to improve accessibility and safety;
- All gas-fired boilers to meet a minimum standard of <40 mgNOx/kWh;
- Where emissions are likely to impact on an AQMA, all gas-fired CHP plant to meet a minimum emissions standard of:
  - Spark ignition engine: 250 mgNOx/Nm<sup>3</sup>;
  - Compression ignition engine: 400 mgNOx/Nm<sup>3</sup>;
  - Gas turbine: 50 mgNOx/Nm<sup>3</sup>.
- A presumption should be to use natural gas-fired installations. Where biomass is proposed within an urban area it is to meet minimum emissions standards of 275 mgNOx/Nm<sup>3</sup> and 25 mgPM/Nm<sup>3</sup>.

A3.5 The guidance also outlines that offsetting emissions might be used as a mitigation measure for a proposed development. However, it states that:

*“It is important that obligations to include offsetting are proportional to the nature and scale of development proposed and the level of concern about air quality; such offsetting can be based on a quantification of the emissions associated with the development. These emissions can be assigned a value, based on the “damage cost approach” used by Defra, and then applied as an indicator of the level of offsetting required, or as a financial obligation on the developer. Unless some form of benchmarking is applied, it is impractical to include building emissions in this approach, but if the boiler and CHP emissions are consistent with the standards as described above then this is not essential”.*

A3.6 The guidance offers a widely used approach for quantifying costs associated with pollutant emissions from transport. It also outlines the following typical measures that may be considered to offset emissions, stating that measures to offset emissions may also be applied as post assessment mitigation:

- Support and promotion of car clubs;
- Contributions to low emission vehicle refuelling infrastructure;
- Provision of incentives for the uptake of low emission vehicles;
- Financial support to low emission public transport options; and
- Improvements to cycling and walking infrastructures.

## Screening

### ***Impacts of the Local Area on the Development***

*"There may be a requirement to carry out an air quality assessment for the impacts of the local area's emissions on the proposed development itself, to assess the exposure that residents or users might experience. This will need to be a matter of judgement and should take into account:*

- *the background and future baseline air quality and whether this will be likely to approach or exceed the values set by air quality objectives;*
- *the presence and location of Air Quality Management Areas as an indicator of local hotspots where the air quality objectives may be exceeded;*
- *the presence of a heavily trafficked road, with emissions that could give rise to sufficiently high concentrations of pollutants (in particular nitrogen dioxide), that would cause unacceptably high exposure for users of the new development; and*
- *the presence of a source of odour and/or dust that may affect amenity for future occupants of the development".*

### ***Impacts of the Development on the Local Area***

A3.7 The guidance sets out two stages of screening criteria that can be used to identify whether a detailed air quality assessment is required, in terms of the impact of the development on the local area. The first stage is that you should proceed to the second stage if any of the following apply:

- 10 or more residential units or a site area of more than 0.5 ha residential use; and/or
- more than 1,000 m<sup>2</sup> of floor space for all other uses or a site area greater than 1 ha.

A3.8 Coupled with any of the following:

- the development has more than 10 parking spaces; and/or
- the development will have a centralised energy facility or other centralised combustion process.

A3.9 If the above do not apply then the development can be screened out as not requiring a detailed air quality assessment of the impact of the development on the local area. If they do apply then you proceed to stage 2, which sets out indicative criteria for requiring an air quality assessment. The stage 2 criteria relating to vehicle emissions are set out below:

- the development will lead to a change in LDV flows of more than 100 AADT within or adjacent to an AQMA or more than 500 AADT elsewhere;
- the development will lead to a change in HDV flows of more than 25 AADT within or adjacent to an AQMA or more than 100 AADT elsewhere;
- the development will lead to a realigning of roads (i.e. changing the proximity of receptors to traffic lanes) where the change is 5m or more and the road is within an AQMA;
- the development will introduce a new junction or remove an existing junction near to relevant receptors, and the junction will cause traffic to significantly change vehicle acceleration/deceleration, e.g. traffic lights or roundabouts;
- the development will introduce or change a bus station where bus flows will change by more than 25 AADT within or adjacent to an AQMA or more than 100 AADT elsewhere; and
- the development will have an underground car park with more than 100 movements per day (total in and out) with an extraction system that exhausts within 20 m of a relevant receptor.

A3.10 The criteria are more stringent where the traffic impacts may arise on roads where concentrations are close to the objective. The presence of an AQMA is taken to indicate the possibility of being close to the objective, but where whole authority AQMAs are present and it is known that the affected roads have concentrations below 90% of the objective, the less stringent criteria are likely to be more appropriate.

A3.11 On combustion processes (including standby emergency generators and shipping) where there is a risk of impacts at relevant receptors, the guidance states that:

*“Typically, any combustion plant where the single or combined NOx emission rate is less than 5 mg/sec is unlikely to give rise to impacts, provided that the emissions are released from a vent or stack in a location and at a height that provides adequate dispersion. As a guide, the 5 mg/s criterion equates to a 450 kW ultra-low NOx gas boiler or a 30kW CHP unit operating at <95mg/Nm<sup>3</sup>.*

*In situations where the emissions are released close to buildings with relevant receptors, or where the dispersion of the plume may be adversely affected by the size and/or height of adjacent buildings (including situations where the stack height is lower than the receptor) then consideration will need to be given to potential impacts at much lower emission rates.*

*Conversely, where existing nitrogen dioxide concentrations are low, and where the dispersion conditions are favourable, a much higher emission rate may be acceptable”.*

A3.12 Should none of the above apply then the development can be screened out as not requiring a detailed air quality assessment of the impact of the development on the local area, provided that professional judgement is applied; the guidance importantly states the following:

*“The criteria provided are precautionary and should be treated as indicative. They are intended to function as a sensitive ‘trigger’ for initiating an assessment in cases where there is a possibility of significant effects arising on local air quality. This possibility will, self-evidently, not be realised in many cases. The criteria should not be applied rigidly; in some instances, it may be appropriate to amend them on the basis of professional judgement, bearing in mind that the objective is to identify situations where there is a possibility of a significant effect on local air quality”.*

A3.13 Even if a development cannot be screened out, the guidance is clear that a detailed assessment is not necessarily required:

*“The use of a Simple Assessment may be appropriate, where it will clearly suffice for the purposes of reaching a conclusion on the significance of effects on local air quality. The principle underlying this guidance is that any assessment should provide enough evidence that will lead to a sound conclusion on the presence, or otherwise, of a significant effect on local air quality. A Simple Assessment will be appropriate, if it can provide this evidence. Similarly, it may be possible to conduct a quantitative assessment that does not require the use of a dispersion model run on a computer”.*

A3.14 The guidance also outlines what the content of the air quality assessment should include, and this has been adhered to in the production of this report.

## Assessment of Significance

A3.15 There is no official guidance in the UK in relation to development control on how to describe the nature of air quality impacts, nor how to assess their significance. The approach within the EPUK/IAQM guidance has, therefore, been used in this assessment. This approach involves a two stage process:

- a qualitative or quantitative description of the impacts on local air quality arising from the development; and
- a judgement on the overall significance of the effects of any impacts.

A3.16 The guidance recommends that the assessment of significance should be based on professional judgement, with the overall air quality impact of the development described as either ‘significant’ or ‘not significant’. In drawing this conclusion, the following factors should be taken into account:

- the existing and future air quality in the absence of the development;
- the extent of current and future population exposure to the impacts;
- the influence and validity of any assumptions adopted when undertaking the prediction of impacts;
- the potential for cumulative impacts and, in such circumstances, several impacts that are described as '*slight*' individually could, taken together, be regarded as having a significant effect for the purposes of air quality management in an area, especially where it is proving difficult to reduce concentrations of a pollutant. Conversely, a '*moderate*' or '*substantial*' impact may not have a significant effect if it is confined to a very small area and where it is not obviously the cause of harm to human health; and
- the judgement on significance relates to the consequences of the impacts; will they have an effect on human health that could be considered as significant? In the majority of cases, the impacts from an individual development will be insufficiently large to result in measurable changes in health outcomes that could be regarded as significant by health care professionals.

A3.17 The guidance is clear that other factors may be relevant in individual cases. It also states that the effect on the residents of any new development where the air quality is such that an air quality objective is not met will be judged as significant. For people working at new developments in this situation, the same will not be true as occupational exposure standards are different, although any assessment may wish to draw attention to the undesirability of the exposure.

A3.18 A judgement of the significance should be made by a competent professional who is suitably qualified. A summary of the professional experience of the staff contributing to this assessment is provided in Appendix A4.

## A4 Professional Experience

### **Guido Pellizzaro, BSc (Hons) MIAQM MEnvSc PIEMA**

Mr Pellizzaro is Technical Director with AQC, with more than 14 years' experience in the field of air quality management and assessment. His main experience relates to managing and delivering air quality assessments for major planning applications and EIA development. He is a Member of the Institution of Environmental Sciences and of the Institute of Air Quality Management, and a Practitioner of the Institute of Environmental Management and Assessment.

### **Ricky Gellatly, BSc (Hons) CSci MEnvSc MIAQM**

Mr Gellatly is a Principal Consultant with AQC with over nine years' relevant experience. He has undertaken air quality assessments for a wide range of projects, assessing many different pollution sources using both qualitative and quantitative methodologies, with most assessments having included dispersion modelling (using a variety of models). He has assessed road schemes, airports, energy from waste facilities, anaerobic digesters, poultry farms, urban extensions, rail freight interchanges, energy centres, waste handling sites, sewage works and shopping and sports centres, amongst others. He also has experience in ambient air quality monitoring, the analysis and interpretation of air quality monitoring data, the monitoring and assessment of nuisance dust and odours and the monitoring and assessment of construction dust. He is a Member of the Institute of Air Quality Management and is a Chartered Scientist.

### **Tomáš Liška, BSc (Hons)**

Mr Liška is an Assistant Consultant with AQC, having joined in September 2020. He holds a BSc in Meteorology and Climate Science from the University of Leeds and is currently finishing his PhD at the University of Edinburgh, which investigates population exposure to air pollution and its inequality in the UK. Tomáš has a keen interest in modelling and data science. He is now gaining experience in the field of air quality monitoring and assessment.

## A5 Construction Mitigation

A5.1 Table A5.1 presents a set of best-practice measures from the GLA guidance (GLA, 2014) that should be incorporated into the specification for the works. These measures should be written into a Dust Management Plan. Some of the measures may only be necessary during specific phases of work, or during activities with a high potential to produce dust, and the list should be refined and expanded upon in liaison with the construction contractor when producing the Dust Management Plan.

**Table A5.1: Best-Practice Mitigation Measures Recommended for the Works**

Measure	Desirable	Highly Recommended
<b>Site Management</b>		
Develop and implement a stakeholder communications plan that includes community engagement before work commences on site		✓
Develop a Dust Management Plan (DMP)		✓
Display the name and contact details of person(s) accountable for air quality pollutant emissions and dust issues on the site boundary		✓
Display the head or regional office contact information		✓
Record and respond to all dust and air quality pollutant emissions complaints		✓
Make a complaints log available to the local authority when asked		✓
Carry out regular site inspections to monitor compliance with air quality and dust control procedures, record inspection results, and make an inspection log available to the Local Authority when asked		✓
Increase the frequency of site inspections by those accountable for dust and air quality pollutant emissions issues when activities with a high potential to produce dust and emissions are being carried out and during prolonged dry or windy conditions		✓
Record any exceptional incidents that cause dust and air quality pollutant emissions, either on or off the site, and ensure that the action taken to resolve the situation is recorded in the log book		✓
<b>Preparing and Maintaining the Site</b>		
Plan the site layout so that machinery and dust-causing activities are located away from receptors, as far as is possible		✓
Erect solid screens or barriers around dusty activities or the site boundary that are at least as high as any stockpiles on site		✓
Fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period		✓
Install green walls, screens or other green infrastructure to minimise the impact of dust and pollution	✓	
Avoid site runoff of water or mud		✓
Keep site fencing, barriers and scaffolding clean using wet methods		✓

Remove materials that have a potential to produce dust from site as soon as possible, unless being re-used on site. If they are being re-used on-site cover as described below		✓
Cover, seed, or fence stockpiles to prevent wind whipping		✓
Carry out regular dust soiling checks of buildings within 100 m of site boundary and provide cleaning if necessary	✓	
Put in place real-time dust and air quality pollutant monitors across the site and ensure they are checked regularly		✓
Agree monitoring locations with the Local Authority		✓
Where possible, commence baseline monitoring at least three months before work begins		✓
<b>Operating Vehicle/Machinery and Sustainable Travel</b>		
Ensure all on-road vehicles comply with the requirements of the London LEZ and ULEZ		✓
Ensure all Non-road Mobile Machinery (NRMM) comply with London's NRMM emission standards. Currently, NRMM used on any site within Greater London are required to meet Stage IIIB of EU Directive 97/68/EC (The European Parliament and the Council of the European Union, 1997) and its subsequent amendments as a minimum, while NRMM used on any site within the Central Activity Zone, Canary Wharf or one of London's Opportunity Areas are required to meet Stage IV of the Directive as a minimum. The proposed development is not within an area where this stricter requirement applies. From January 2025, NRMM used anywhere in London will be required to meet stage IV, while from January 2030 the stage V standard will apply. From January 2040 only zero emission machinery will be allowed		✓
Ensure all vehicles switch off engines when stationary – no idling vehicles		✓
Avoid the use of diesel- or petrol-powered generators and use mains electricity or battery-powered equipment where practicable		✓
Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials		✓
Implement a Travel Plan that supports and encourages sustainable staff travel (public transport, cycling, walking, and car-sharing)		✓
<b>Operations</b>		
Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems		✓
Ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation, using non-potable water where possible and appropriate		✓
Use enclosed chutes, conveyors and covered skips		✓
Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate		✓
Ensure equipment is readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods		✓

<b>Waste Management</b>		
Reuse and recycle waste to reduce dust from waste materials		✓
Avoid bonfires and burning of waste materials		✓
<b>Measures Specific to Demolition</b>		
Soft strip inside buildings before demolition (retaining walls and windows in the rest of the building where possible, to provide a screen against dust)	✓	
Ensure water suppression is used during demolition operations.		✓
Avoid explosive blasting, using appropriate manual or mechanical alternatives		✓
Bag and remove any biological debris or damp down such material before demolition		✓
<b>Measures Specific to Construction</b>		
Avoid scabbling (roughening of concrete surfaces), if possible	✓	
Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place	✓	
<b>Measures Specific to Trackout</b>		
Regularly use a water-assisted dust sweeper on the access and local roads, as necessary, to remove any material tracked out of the site		✓
Avoid dry sweeping of large areas		✓
Ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport		✓
Access gates should be located at least 10 m from receptors, where possible		✓
Apply dust suppressants to locations where a large volume of vehicles enter and exit the construction site	✓	