London Heathrow Marriott Hotel, Bath Road

Low Emission Strategy

On Behalf of Skelly and Couch
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Greenavon Ltd
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1 Introduction

1.1 Greenavon Ltd was commissioned by Skelly and Couch to provide a Low Emission Strategy (LES) to discharge Planning Condition 9 of permission 12502/APP/2020/3618 for a proposed extension to the London Heathrow Marriott Hotel, Bath Road (the Site).

1.2 The proposed redevelopment involves:

> *"Construction of part 5 part 6 storey building immediately to the west of the existing hotel to provide an additional 259 bedrooms; associated works including hard and soft landscaping."*

1.3 Condition 9 states:

> *"No development shall commence until a Low Emission Strategy (LES) has been submitted to and approved in writing by the Local Planning Authority. The LES shall address:*
>
> *1) the fleet composition serving the proposed development to be Euro 6/VI or cleaner (e.g. electric) or have implemented retrofitting devices that will enable compliance with such Euro standards.*
>
> *2) the supply of energy to the proposed development. Any CHP or gas boiler will have to conform with the London Ultra Low NOx requirements;*
>
> *The strategy shall detail the steps that will be followed in addressing the lower emissions requirements stated above and what measures will be taken to take into account future changing standards and available technologies and be updated accordingly in agreement with the local planning authority.*
>
> *3) an electric vehicle fast charging bay. This is to be implemented as part of the proposal with a minimum of the number of charging points required in the London Plan.*
>
> *4) a clear and effective strategy to encourage staff / users to:*
>
> *a) use public transport;*
>
> *b) cycle / walk to work where practicable;*
>
> *c) enter car share schemes;*
>
> *d) purchase and drive to work zero emission vehicles.*

The measures in the agreed scheme shall be maintained throughout the life of the development."

1.4 The stated purpose of the Condition is *"To reduce the impact on air quality in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policy (November 2012), Policy DMEI 14 of the Hillingdon Local Plan: Part 2 – Development Management Policies (January 2020), Policy SI 1 of the London Plan (March 2021) and paragraph 170 of the National Planning Policy Framework (February 2019)."*

1.5 The impact of the scheme during construction and operation was assessed, by Redmore[1], as part of the original planning application. It found that:

- Pollution concentrations across the Site would not exceed the relevant Air Quality Objectives.
- the proposed development would have a negligible impact on air quality.
- the proposal would be Air Quality Neutral for transport and building emissions.

1.6 The proposed development is therefore not constrained by air quality, and a LES is not required to offset a significant effect. The purpose of this LES is instead to set out the operational-phase measures that will be implemented to minimise emissions and exposure, evidencing good practice and good design.

[1] Redmore (2020) Heathrow Marriott Hotel, London– Air Quality Assessment (reference: 3406r3)

2 Proposed Measures and Actions

2.1 The following measures will be implemented across the operational phase of the development. They include commitments already secured through approved management plans and technical documents, including the:

- Framework Staff and Visitor Travel Plan[2]; and
- Framework Delivery and Service Vehicle Management Plan[3]

Fleet Composition

2.2 Paragraph 3.16 of the Framework Delivery and Service Vehicle Management Plan commits the Occupier(s) to using delivery/ servicing companies that operate vehicles that comply with Low Emission Zone (LEZ) standards. The LEZ standards apply to heavy duty vehicles (HDV).

2.3 The Occupier(s) will also:

- The operator will specify Euro 6/VI or cleaner vehicles as the preferred standard for regular servicing and delivery contracts, except where demonstrably unavailable; and
- Investigate whether deliveries can be undertaken using smaller vehicles with lower emissions (e.g. e-cargo bikes, electric vans, hybrids).

Heating and Energy Strategy

2.4 The heating strategy for the building is predominantly led by air-source heat pumps (ASHPs), providing the main source of space heating and domestic hot water. To ensure resilience and continuity of supply, the ASHP system is supported by gas top up hot water heaters.

2.5 *Andrews MAXXFlo EVO Condensing Water Heater*s are proposed, which have NOx emissions of <= 39 mg/kWh—making it an ultra-low NOx emission boiler. The specification of the water heater can be found online[4] and is reproduced in Appendix A.

[2] Mayer Brown (2020) London Heathrow Marriott Hotel, Bath Road – Framework Staff And Visitor Travel Plan (Reference: ADIFHeathrow,1).
[3] Mayer Brown (2020) London Heathrow Marriott Hotel, Bath Road – Framework Delivery and Service Vehicle Management Plan (Reference: ADIFHeathrow,1).
[4] Andrews Water Heaters - *MAXXFlo EVO Condensing Water Heater*s. Available at: maxxflo-evo-technical-data-sheet.pdf

2.6 Any future replacement top up boiler would also have low NOx emissions, or better (e.g. electric boilers).

2.7 Records of the usage of the gas top up heaters will be maintained to ensure that usage remains ancillary. These records will be made available to the local authority, on request.

Electric Vehicle Charging Bay

2.8 37 active electric vehicle (EV) charging bays are proposed—covering 20% of spaces. This exceeds Building Regulations Standards. One of these charge points will be a fast charger— a ZAPTEC PRO: 22kW | MID METER | SOCKET[5] (or similar).

2.9 To encourage staff to purchase and drive to work using zero emission vehicles, some of the EV spaces will be available for staff use.

2.10 The location of the EV charge points is shown in Appendix B.

Framework Travel Plan

2.11 The proposal includes a Framework Staff and Visitor Travel Plan, approved as part of the original application, which describes both the hard and soft measures that will be implemented to support sustainable transport choices:

- **Hard**: infrastructure measures on and around the Site that will help to achieve the plan's objectives, such as the provision of secure cycle parking and changing areas.
- **Soft**: behavioural measures for staff, relating to access to cycle training, the cycle to work scheme, the provision of information to assist in journey planning, discounted ticketing, as well as the promotion of car sharing. For visitors, information will be provided on how to visit the hotel using sustainable transport.

2.12 A Travel Plan Coordinator will be responsible for implementation, monitoring and reporting. Further information can be found in the approved Framework Staff and Visitor Travel Plan.

[5] Volta EV - ZAPTEC PRO: 22kW | MID METER | SOCKET. Available at: ZAPTEC PRO: 22kW | MID METER | SOCKET

Review

2.13 The LES will be reviewed every five years, or sooner where material changes occur in technology or regulatory standards. The review will consider opportunities to increase the proportion of zero-emission servicing vehicles, expand EV charging infrastructure, and replace fossil-fuelled plant with lower-emission alternatives where feasible.

3 Conclusions

3.1 This Low Emissions Strategy provides the relevant details to assist in the discharge of Planning Condition 9 of permission 12502/APP/2020/3618.

3.2 Commitments have been made to ensure that deliveries and servicing are conducted by low emission vehicles.

3.3 The proposed development will be heated with an ASHP, which are zero-on-site emission. Ancillary top-up gas water heaters are proposed—however, these are ultra-low NOx emission.

3.4 An appropriate level of EV charging is proposed, with one of the proposed 37 devices classified as a fast charger (22kW unit). Some of the EV charging bays will be made available to staff to encourage them to purchase electric vehicles.

3.5 The approved Framework Staff and Visitor Travel Plan makes a series of commitments to promote sustainable transport options, in line with the requirements of Condition 9.

3.6 The LES will be reviewed periodically to ensure that impacts on local air quality will be minimised.

3.7 The above level of mitigation is judged to be reasonable and appropriate, and in line with good practice principles outlined in best practice guidance. Condition 9 should therefore be discharged.

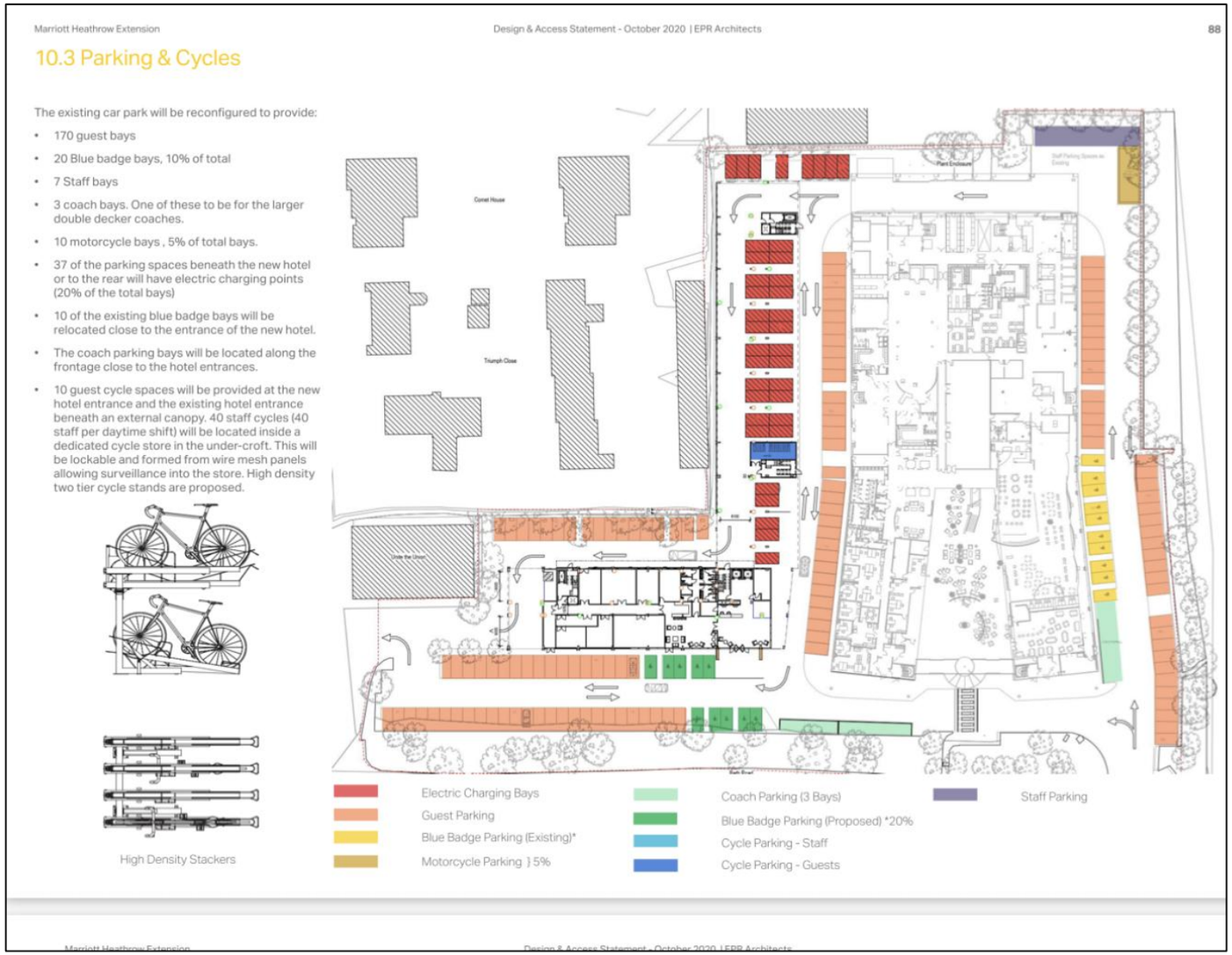
Appendix A: Water Heater Specification

MAXXflo EVO TECHNICAL SPECIFICATION GUIDE

Technical information

			SINGLE BURNER				TWIN BURNER	
			CWH 30/201	CWH 30/301	CWH 60/201	CWH 60/301	CWH 90/302	CWH 120/302
Product code			7726948	7726950	7726949	7726951	7726952	7726953
Performance	Maximum heat input net (gross)	kW	28(31)	28(31)	56(62)	56(62)	84 (93)	112 (124)
	Heat output	kW	30.5	30.5	61	61	91.6	122
	Gross thermal efficiency	%	98	98	98	98	98%	98%
	Standby loss	kWh/day	1.68	2.26	1.68	2.26	2.26	2.26
ErP	NO_x emissions (0% O_2)	mg/kWh	39	39	36	36	39	36
	ErP efficiency rating		A	A	A	A	-	-
	Water heater efficiency	%	95	98	91	97	91	90
	Noise level (EN15036-1 avg @1m)	dBA	53	63	53	63	62	65

Appendix B: EV Charge Point Plan





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Experts in Air Quality and Odour Assessment

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