Low Emission Strategy

Hayes Park South & Central, Hayes

Prepared on behalf of:
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Introduction

Background

Build Energy was commissioned by Prospero Projects Ltd to produce a Low Emission Strategy (LES) for a residential development at Hayes Park South & Central, Hayes.

Site Location and Context

The site is located at Hayes Park South & Central, Hayes Park, Hayes End Road, Hayes at approximate National Grid Reference (NGR): 508885, 182420. Reference should be made to Figure 1 for a map of the site and surrounding area.

The proposals comprise the change of use of the existing buildings to provide new homes (Use Class C3), together with internal and external works to the buildings, landscaping, car and cycle parking, and other associated works.

Planning consent for the development has been granted by the London Borough of Hillingdon (LBoH) (reference: 12853/APP/2023/1492) subject to a number of conditions. These include the following in relation to air quality:

"Prior to the first occupation of the development, a Low Emission Strategy (LES) shall be submitted to and approved in writing by the Local Planning Authority. The LES shall detail but be not restricted to:

1) a clear and effective strategy to encourage users of development 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.

2) Install EV fast charging points to promote the use of zero emission vehicles to serve the residential area.

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

REASON
As the application site is within an Air Quality Management Area and within close proximity to the Uxbridge Road Air Quality Focus Area, and to reduce the impact on air quality in accordance with Policy EM8 of the Local Plan: Part 1 (2012), Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policies SI 1 and T4 of the London Plan (2021) and Paragraphs 180(e) and 192 of the National Planning Policy Framework (2023)."

A LES has therefore been produced in order to address the requirements of the above condition. This is provided in the following report.

Strategy

Introduction

There is the potential for the following emissions associated with the construction and operation of the scheme:

- Fugitive dust emissions during the construction phase;
- Exhaust emissions from off-site vehicles; and,
- On-site emissions associated with provision of heating and hot water.

The magnitude of the above emissions and measures to limit releases are considered in the following Sections.

London Sustainable Design and Construction Supplementary Planning Guidance

The London Sustainable Design and Construction Supplementary Planning Guidance[1] provides information on what measures developers can include in their building designs and operations to achieve the carbon dioxide and water consumption targets set out in the London Plan, as well as information on how boroughs can take forward the new approaches set out in the London Plan, such as carbon-dioxide off-setting, retrofitting and air quality neutral.

Review of the guidance indicated the following Sections of relevance to this LES:

- Construction Phase; and,
- Air Quality Neutral.

These are summarised in the following sections.

Construction Phase

There is the potential for fugitive dust emissions to occur as a result of construction phase activities. These were assessed in the Air Quality and Dust Management Plan[2] (AQDMP) undertaken by NRG Consulting in accordance with the methodology outlined within the Mayor of London's 'The Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance'[3]. The results indicated the following:

- The potential risk of dust soiling was determined as **low** from demolition, earthworks and construction and **negligible** from trackout;
- The potential risk of human health impacts was determined as **low** from demolition, earthworks and construction and **negligible** from trackout; and,
- The potential risk of ecological impacts was determined as **low** from demolition, earthworks and construction and **negligible** from trackout.

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1 Sustainable Design and Construction Supplementary Planning Guidance, The Mayor of London, 2014.
2 AQDMP, NRG Consulting, 2023.
3 Sustainable Design and Construction Supplementary Planning Guidance, The Mayor of London, 2014.

Suitable mitigation measures were therefore identified in order to reduce potential impacts as a result of the proposed development in accordance with the Mayor of London's Guidance[4]. These are summarised in Table 1.

Table 1 Fugitive Dust Emission Mitigation Measures

Issue	Control Measure
Site Management	The name and contact details of the individual accountable for air quality emissions and dust generated from the site will be displayed on the site boundary, along with the head or regional office contact information A site log will be maintained to record complaints and outcomes of the site inspections will be recorded in the relevant form and issued to the council upon request Record and respond to all dust and air quality pollutant emissions complaints A complaints log will be created and will be made available to the LBH Environmental Team at Hillingdon when asked Carry out regular site inspections to monitor compliance with air quality and dust control procedures, record inspection results, and create 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 and dust 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 the action taken to resolve the situation is recorded in the log book
Preparing and Maintaining the Site	The site layout will be planned so that Non-Road Mobile Machinery (NRMM) plant and dust-causing activities are located away as remote as practically possible from the off-site residential receptors around the development's area Erect solid screens or barriers around dust generating activities, at least, as high as any stockpiles on site Prevent site runoff of water or mud Carry out regular dust soiling checks of buildings within 100m of site boundary and cleaning to be provided if necessary
Operating Vehicle/Machinery and Sustainable Travel	Ensure all NRMM comply with the standards set within this guidance 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 possible Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing)
Operations	Ensure an adequate water supply on the site for effective dust/particulate matter mitigation (using recycled water where possible) 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 Prohibit bonfires and burning of waste materials
Waste Management	Reuse and recycle waste to reduce dust from waste materials
Demolition	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
Construction	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 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 Avoid scabbling (roughening of concrete surfaces) if possible
Trackout	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 the site are securely covered to prevent escape of materials during transport

4 Sustainable Design and Construction Supplementary Planning Guidance, The Mayor of London, 2014.

Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable

Air Quality Neutral

The London Plan[5] requires that all developments are 'air quality neutral' to ensure proposals do not lead to further deterioration of existing poor air quality. In order to support the policy, guidance[6] has been produced by the Greater London Authority (GLA). This provides a methodology for determining potential emissions from a development and benchmark values for comparison purposes. Where the benchmark is exceeded then action is required, either locally or by way of off-setting.

The Air Quality Assessment[7] produced by NRG Consulting in support of the planning application for the scheme concluded that the proposed development will meet the building emission benchmarks. As such, no mitigation measures are required.

The proposed development does not meet the transport emission benchmarks. As such, the following mitigation measures will be included:

- A Framework Travel Plan[8] has been produced to encourage sustainable modes of travel;
- Complete passive and active provision for every car parking space at the development for Electric Vehicle Charging Points (EVCP);
    - Subject to MEP for EVCP requirements, there will be a minimum of 20% active/80% passive provision.
- Cycle parking is being provided across the scheme to meet sustainable transport provision needs:
    - Central - Long-stay: 79; Short-stay: 2
    - South - Long-stay: 124; Short-stay: 2
    - Total - Long-stay: 203; Short-stay: 4
    - 5% Accessible Parking and ~20% Sheffield stands. Remainder double stackers
- Multiple additional Sustainable Transport initiatives are being undertaken at the scheme:
    - Car Club - 1 no. from Enterprise Car Club, initial provision for 2-3 years funded through S106
    - Santander Cycle Hire
    - Travel Packs
- Car Parking Standards are at a 1:1, lower than London Borough of Hillingdon and London Plan maximum standards; and,
- Public transport - identifying measures to improve access to bus stops, stations, local destinations through the Active Travel Zone assessment.

Based on the inclusion of the above mitigation and given the location of the scheme it is considered that air quality issues from a transport emissions perspective do not present a constraint for the scheme.

5 London Plan 2021: The Spatial Development Strategy for Greater London, GLA, 2021.
6 London Plan Guidance: Air Quality Neutral, GLA, 2023.
7 Air Quality Assessment, NRG Consulting, 2023.
8 Hayes Park - Framework Travel Plan, Waterman, 2023.

Public Transport

Review of the Framework Travel Plan[9] produced by Waterman in support of the planning application for the scheme indicated the site is well positioned with regard to public transport. The nearest bus stops are Hayes End (Stop XF-westbound) and (Stop XC - eastbound), which are located approximately 700m to the south of the site on Uxbridge Road. Additional bus stops are available on Adelphi Way and Kingshill Avenue, approximately 750m and 1km, respectively, to the east of the site. These provide regular connections to several destinations including Ruislip, Uxbridge, Ealing, Hounslow and White City.

Hayes & Harlington rail station is the closest station to the site, located approximately 3.4km to the southeast. The station is served by Great Western Railway (GWR) and the Elizabeth Line and provides access to various destinations including Heathrow Airport, Didcot Parkway, London Paddington and Reading. Bus routes 90, 195, 278 and H98 which are accessible to the site provide access to Hayes & Harlington rail station.

As outlined in the Framework Travel Plan[10], a number of measures will be implemented in order to increase and encourage the use of public transport:

- Provision of up-to-date public transport information including timetables and bus company contact information within Travel Packs and displays on notice boards;
- Promotion of mobile applications such as Citymapper and Transport for London (TfL) Go; and,
- Promotion of walking routes that connect to bus stops and rail stations.

Cycling and Walking

The Framework Travel Plan[11] details the accessibility of the proposed development. This indicates that the pedestrian network surrounding the site is in good condition with dropped crossings providing safe access for all users. Footpaths are present on both sides of Uxbridge Road and Park Lane which would encourage the use of walking to nearby facilities. Additionally, a cycle lane is present along Uxbridge Lane to the east of the site. Local roads are lightly trafficked and therefore suitable for cyclists.

In order to further encourage the use of cycling, the development will provide secure cycle parking, undercover and located within accessible locations. Parking provision will be monitored as part of the Travel Plan with an increase in spaces arranged if necessary. The Travel Information Pack will provide information on 'Bike Week' and an on-site Bicycle Users Group for residents.

In order to further encourage walking, the following measures will be implemented:

- Provision of information on the 'on and off highway' pedestrian network routes to residents and visitors, including maps to be displayed on transport notice boards;
- Promotion of events such as 'Walk to Work' week; and,
- Provision of an improved pedestrian realm through the development to promote walking to local destinations for day-to-day goods.

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9 Hayes Park - Framework Travel Plan, Waterman, 2023.
10 Hayes Park - Framework Travel Plan, Waterman, 2023.
11 Hayes Park - Framework Travel Plan, Waterman, 2023.

Conclusion

Build Energy was commissioned by Prospero Projects Ltd to produce a LES for a residential development at Hayes Park South & Central, Hayes.

In accordance with the requirements of the relevant planning conditions, the LES has covered the following factors:

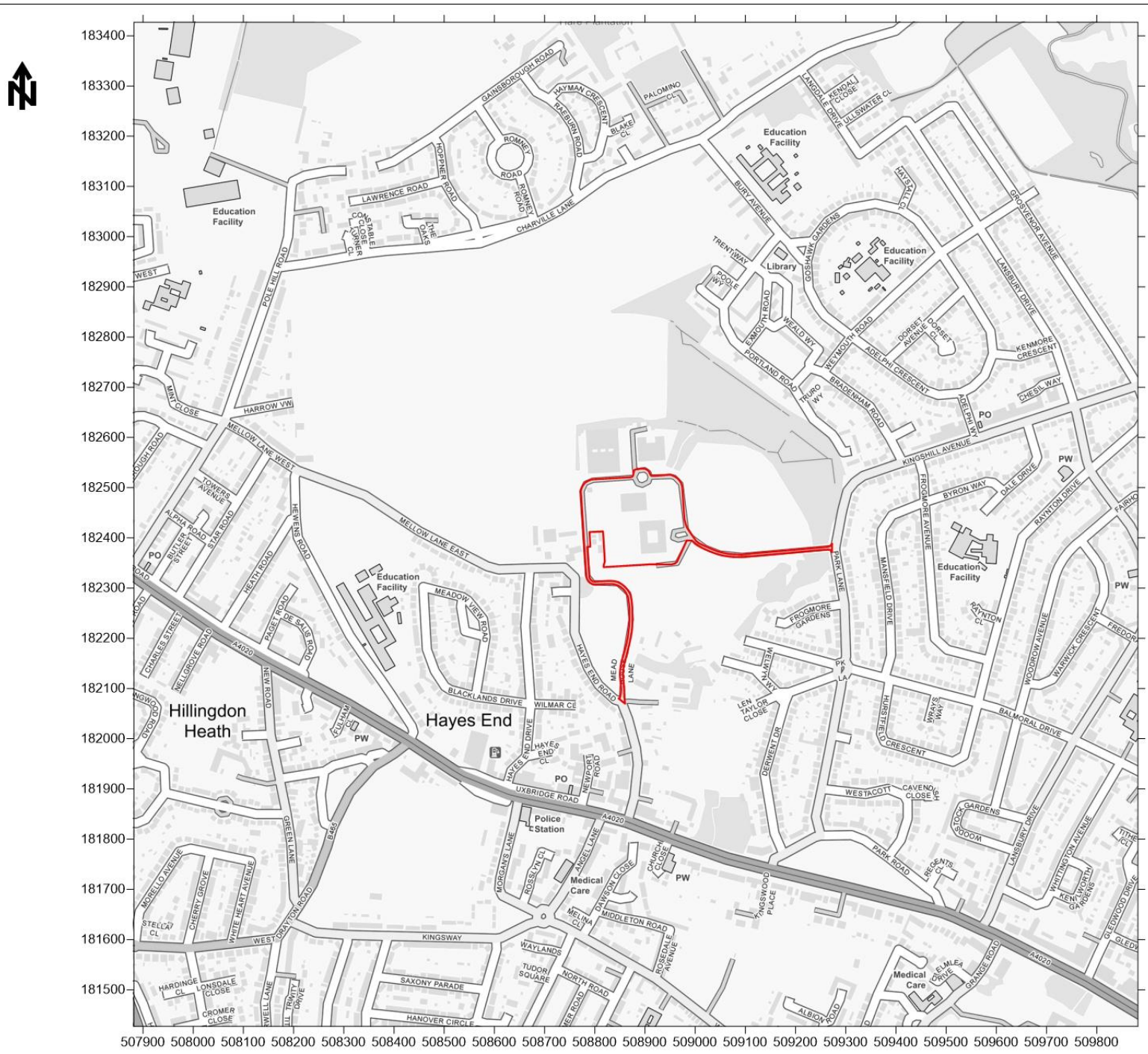
- The AQDMP produced by NRG Consulting identified mitigation measures to be implemented during the construction phase to limit fugitive dust emissions;
- The scheme is Air Quality Neutral from a building emissions perspective. A number of mitigation measures will be implemented on site to reduce effects associated with transport emissions;
- The site is well positioned for access to public transport and local amenities;
- Additional provision will be made on site to encourage the use of public transport;
- Additional provision will be made on site to encourage walking and cycling.

Based on the above, it is considered that the planning condition should be discharged.

Abbreviations

AQDMP	Air Quality Dust Management Plan
EVCP	Electric Vehicle Charging Point
GLA	Greater London Authority
GWR	Great Western Railway
LBoH	London Borough of Hillingdon
LES	Low Emission Strategy
NGR	National Grid Reference
NRMM	Non-Road Mobile Machinery
TfL	Transport for London

Figures



Legend

Site Boundary

Title
Figure 1 - Site Location Plan

Project
Low Emission Strategy
Hayes Park South & Central,
Hemel Hempstead

Project Reference
BE18430

Client
Prospero Projects Ltd

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