Project: Guild Living, Uxbridge, Hillingdon

2nd December 2020

Response to the Air Quality Officer's comments on Air Quality

As detailed in paragraph 3.6 of the air quality report prepared by AQC in support of planning application, the proposed development will lead to a net reduction in traffic on local roads, by 209 vehicles a day on Harefield Road. The impacts of road traffic emissions on existing receptors were thus screened out of the assessment, in agreement with Val Beale and Ana Grossinho from the Environmental Team at the London Borough of Hillingdon through a discussion held on the 30th June 2020.

In line with Policy 7.14 of the London Plan, an air quality neutral assessment was carried out for the proposed development, considering both transport and building emissions. The air quality neutral assessment is presented in Section 7 of the air quality report. The assessment was carried out in line with the adopted guidance document and methodology prepared by Environ and AQC on behalf of the GLA in 2014. The benchmark values presented in the guidance document were determined for the previous set of planning land use classes, based on typical emissions associated with each land use, for each part of London (CAZ, inner or outer). This methodology remains valid following the updated land use classes adopted in September 2020. The air quality neutral assessment presented in the air quality report confirms that the proposed development is air quality neutral for both transport and building emissions.

In addition to the air quality neutral assessment, the air quality assessment modelled the emissions from the proposed emergency diesel generator and showed the generator would not lead to significant air quality effects on and off site, and that air quality conditions for future users and residents of the proposed development would be acceptable, with no requirement for mitigation measures to be implemented.

Air Quality Consultants
119 Marylebone Road, London NW1 5PU

Tel 020 3873 4780
Email aqc@aqconsultants.co.uk
www.aqconsultants.co.uk

On that basis, and in line with adopted guidance and policy from the GLA or the London Borough of Hillingdon, as well as with Policy DMEI 14 of the emerging Local Plan, the request for financial contributions towards the implementation of the air quality action plan measures on the basis of the air quality neutrality of the proposed development is not considered appropriate. This is particularly the case when considering the proposed development is benefiting local air quality through a net reduction in traffic on the local road network. Furthermore, the financial contributions for the backup generator are not applicable, as these damage costs relate to emissions from “large industrial processes” only, they do not relate to backup emergency generators.

The requirement to prepare a Low Emission Strategy (LES) and to reduce emission from demolition and construction will however be fulfilled through the submission of a LES and a Dust Management Plan, which will be secured by planning condition.

Pauline Jezequel
Principal Consultant