The C&L Country Club, West End Rd, Hayes, Northolt UB5 6RD

Air Quality Assessment

On Behalf of Arora Management Services Limited
April 2026

Greenavon Ltd
www.greenavon.com

Document Control Sheet

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Quality Management

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V1	For issue	22/02/2024	HP	Harley Parfitt, Director
V2	Renewal of permission	21/04/2026	HP	Harley Parfitt, Director

Disclaimer

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1 Introduction

1.1 Greenavon Ltd was commissioned by Arora Management Services Limited to undertake an Air Quality Assessment in support of a full planning application to the London Borough of Hillingdon (LBH) for the extension of the temporary permission for the partial change of use of the C&L Country Club, West End Rd, Hayes, Northolt UB5 6RD (the Site).

1.2 The planning application seeks a three-year extension to the temporary permission (2216/APP/2024/562) to use part of the Site for the sale of cars (Sui Generis use-class).

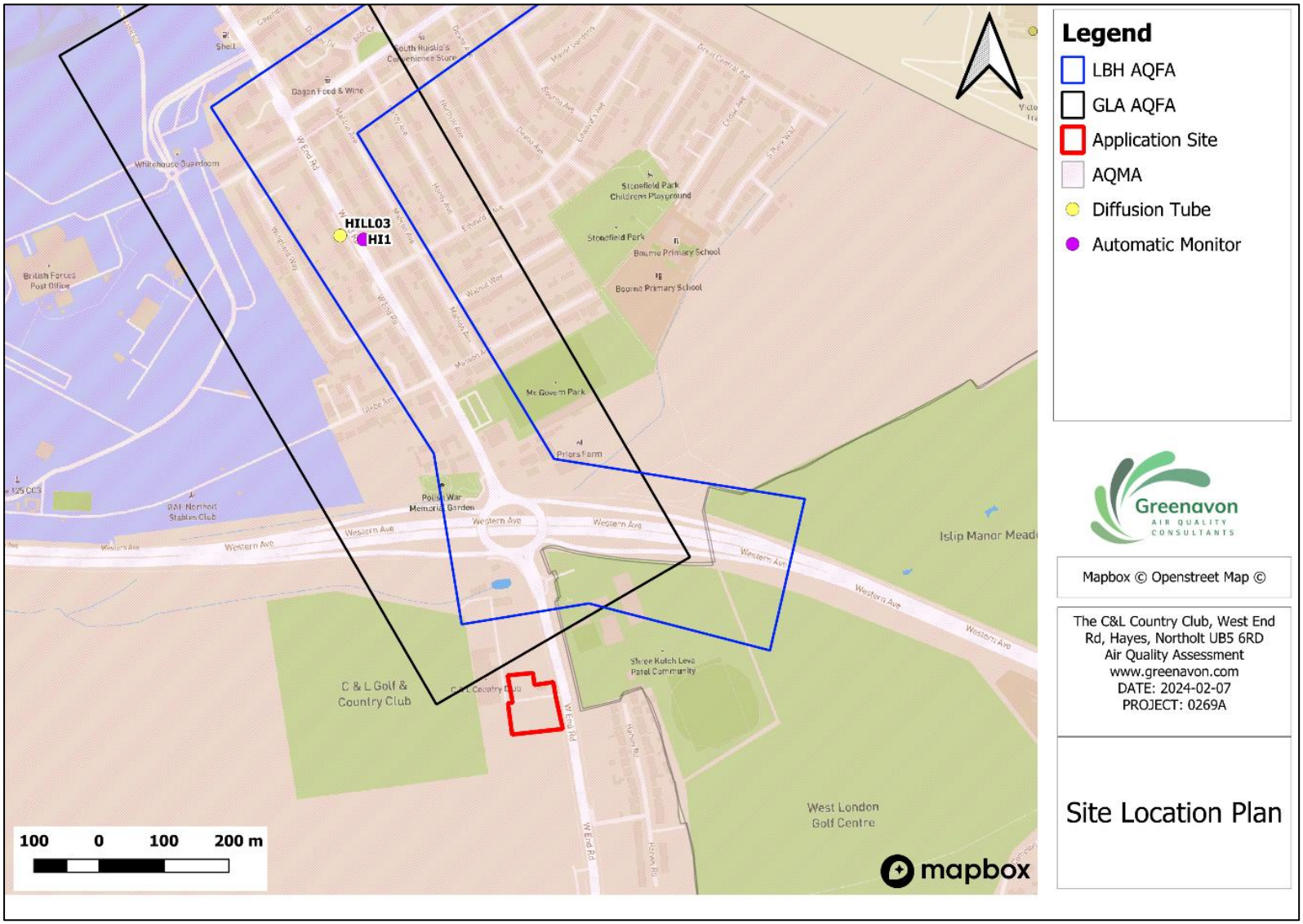
1.3 Land use surrounding the site is mixed with commercial, residential, and significant highway infrastructure all located in proximity. The closest highly sensitive uses to the application site are the residential dwellings on Harvey Road, on the eastern side of West End Road. A Site Location Plan showing the area subject to the planning application is included in Figure 1.1, below.

1.4 The application site is located within the LBH's Air Quality Management Area (AQMA), which is declared due to elevated concentrations of nitrogen dioxide (NO_2). The application site is not located within an Air Quality Focus Area (AQFA). AQFAs are areas of both poor air quality and high human exposure (e.g. residential dwellings).

1.5 The main source of air pollution in the vicinity of the application site is from vehicles travelling on the local road network, particularly West End Road and the A40.

1.6 This report assesses the proposed development's impact on, and sensitivity to, local air quality during the operational phase, recommending mitigation where necessary. The proposal includes no construction and so no assessment of the construction phase is required.

Figure 1:1: Site Location Plan



2 Policy Context

Air Quality Standards Regulations

2.1 The Air Quality Standards (AQS) Regulations 2010[1] and subsequent amendments, regulate the concentrations of major pollutants in outdoor air in the UK, including particulate matter (PM_{10} & $PM_{2.5}$), nitrogen dioxide (NO_2), sulphur dioxide (SO_2), ozone (O_3), carbon monoxide (CO) and lead (Pb). These regulations seek to minimise the public's exposure to air pollution by requiring ambient concentrations to be within legally binding limit values, as well as target values.

2.2 The AQSs of relevance to this assessment are summarised in Table 2.1 below.

Table 2.1: Air Quality Standards for England

Pollutant	Averaging Period	Objective (µg/m^3)	Date to be achieved by
Nitrogen dioxide (NO_2)	1-hour mean not to be exceeded more than 18 times per year.	200	31 December 2005
	Annual mean	40	31 December 2005
Particulate Matter (PM_{10})	24-Hour Mean not to be exceeded more than 35 times per year	50	31 December 2004
	Annual mean	40	31 December 2004
Particulate Matter ($PM_{2.5}$)	Annual mean	20	1 January 2020

Air Quality Strategy and Environment Improvement Plan

2.3 The Environment Act 1995 requires the Government and devolved administrations to produce a National Air Quality Strategy (NAQS) for the UK. This strategy sets out the framework for improving ambient air quality across the UK. The last major update was published in 2007, with further updates issued in 2011.

2.4 Under the Environment Act 2021[2], the Secretary of State is required to review the NAQS every five years. The first review under the 2021 Act was completed in 2023, and accompanying secondary legislation introduced new statutory air quality targets

[1] Air Quality Standards Regulations 2010 (as amended), S.I. 2010/1001
[2] *Environment* Act 2021 SI No. 1274 (C. 72).

for $PM_{2.5}$ in England. The long-term statutory target is that the annual mean concentration of $PM_{2.5}$ must not exceed 10 µg/m³ by 2040. The *Environment Improvement Plan for England*[3] also sets an ambition to achieve 10 µg/m³ at as many monitoring locations as possible by 2030; however, this is a policy target and not a legal requirement.

2.5 The national government is responsible for meeting the statutory $PM_{2.5}$ targets, which aim to improve air quality and protect public health. These targets emphasise driving sustained reductions in $PM_{2.5}$ concentrations, rather than establishing limit values to be applied on a site-specific basis.

2.6 According to Interim Defra guidance[4], these targets are not intended to be applied in the same way as air quality limit values within the planning process. The updated approach shifts away from solely assessing whether a development may exceed a legal threshold (i.e. a limit value). Instead, it emphasises that, wherever reasonably practicable, mitigation measures should be incorporated into design to minimise emissions of, and exposure to, $PM_{2.5}$.

Local Air Quality Management Regime

2.7 Part IV of the Environment Act 1995 and Part II of the Environment (Northern Ireland) Order 2002 sets out that it is the responsibility of every local authority to review air quality within its area and designate an AQMA where air quality limit values are not being achieved. An Air Quality Action Plan (AQAP) setting out the measures to reduce pollution in that area must then be put in place.

2.8 The LBH has adopted an AQAP[5] which includes several measures outlining how emissions from development can be minimised. Of note, Action 5 outlines that in Air Quality Focus Areas (AQFA) *"damage cost calculations are requested to form the basis of planning obligation for costs where the developer mitigation is insufficient"*.

2.9 It is understood that the 2025-2030 AQAP[6] has not yet been adopted. The draft AQAP includes similar actions requiring *"all new major developments located in Air Quality Focus Areas to be air quality positive (i.e. result in improvements) and applying the*

[3] Department for Environment, Food & Rural Affairs (2025). Environmental Improvement Plan 2025. Available at: GOV.UK (Accessed: 06 December 2025).
[4] Department for Environment, Food & Rural Affairs (DEFRA), 2025. $PM_{2.5}$ Targets and Planning. Available at: https://uk-air.defra.gov.uk/pm25targets/planning [Accessed 2 May 2025].
[5] LBH (2019) Air Quality Action Plan, 2019-2024
[6] LBH (2025) Air Quality Action Plan, 2025-2030 (Pre-Consultation Draft)

DEFRA damage cost approach for those that cannot achieve compliance within the development". The proposed development is not located within an AQFA.

National Planning Policy Framework

2.10 The revised National Planning Policy Framework (NPPF)[7], updated in December 2024, sets out the Government's planning policies for England and how these are expected to be applied. A key aim of the NPPF is to promote sustainable development and regarding conserving the natural environment, paragraph 187 states:

> *"Planning policies and decisions should contribute to and enhance the natural and local environment by: […]*
>
> *e) 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 and water quality, taking into account relevant information such as river basin management plans".*

2.11 Paragraph 199 relates to compliance with legal limit values and how planning decisions should be consistent with local air quality policy and action plans. It states:

> *"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".*

[7] Ministry of Housing, Communities & Local Government (2024) National Planning Policy Framework

2.12 Paragraph 198 relates to the appropriate siting of development and the assessment of cumulative effects, it 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."*

2.13 Whilst principally relating to sustainable transport, Paragraph 110 is indirectly related to air quality and states:

> *"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."*

London Plan

2.14 The London Plan[8] is the overarching spatial development strategy for Greater London. It contains several policies of relevance to air quality, including Policy SI 1 Improving Air Quality, which states:

> *"A 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.*
>
> *B To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:*
>
> *1) Development proposals should not:*
>
> *a) lead to further deterioration of existing poor air quality*

[8] Greater London Authority (2021) The London Plan: https://www.london.gov.uk/programmes-strategies/planning/london-plan

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) 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. [….]

D 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.

E 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."

Local Planning Policy

2.15 The Development Plan for Hillingdon forms the statutory basis for planning decisions. It consists of Hillingdon's *Local Plan: Part 1 – Strategic Policies*[9] (previously known as the Core Strategy) that was adopted on 8th November 2012. The Local Plan: Part 1 contains policy of relevance to air quality, including:

> *"Policy EM8: Land, Water, Air and Noise […]*
>
> *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 Actions 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."*

2.16 The Local Plan Part 2 comprises *Development Management Policies, Site Allocations and Designations and the Policies Map*[10]. The Local Plan: Part 2 contains policies of relevance to air quality, including:

> *"Policy DMEI 1: Living Walls and Roofs and on-site Vegetation*

[9] LBH (2012) Local Plan: Part 1 Strategic Policies: https://modgov.hillingdon.gov.uk/documents/s14281/121108%20-%2007%20-%20local%20plan%20document.pdf

[10] LBH (2020) *Local Plan Part 2 comprises Development Management Policies, Site Allocations and Designations and the Policies Map*

All development proposals are required to comply with the following:

i) All major development should incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided; and

ii) 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."

and

"Policy DMEI 14: Air Quality

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."

Air Quality Guidance

2.17 This assessment has been undertaken with reference to the following regional and national guidance:

- Defra (2022), *Local Air Quality Management Technical Guidance* (LAQM.TG (22))[11];
- Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) (2017), *Land-Use Planning and Development Control: Planning for Air Quality*[12];

[11] Defra. 2022. Part IV of the Environment Act 1995, Environment (Northern Ireland) Order 2002 Part III, Local Air Quality Management, Technical Guidance LAQM. TG(22).
[12] EPUK & IAQM. (2017). *Land-Use Planning & Development Control: Planning for Air Quality.*

- IAQM (2021), *A guide to the assessment of air quality impacts on designated nature conservation sites*[13]; and
- Greater London Authority (2023) (GLA) *Air Quality Neutral Guidance*[14].

[13] EPUK & IAQM. (2020). *A guide to the assessment of air quality impacts on designated nature conservation sites.*
[14]Greater London Authority (2023) *Air Quality Neutral Guidance*
https://www.london.gov.uk/sites/default/files/2023-02/Air%20Quality%20Neutral%20LPG.pdf

3 Methodology

Baseline Conditions

3.1 The purpose of the baseline assessment is to gather information on existing air quality to better understand how air quality might constrain, or be impacted by, a proposal.

3.2 A review of baseline conditions has been undertaken using data provided by Defra's UK AIR information resource[15], review and assessment reports provided by LBH[16] and the London Atmospheric Emissions Inventory (LAEI)[17]. Defra's Pollutant Release and Transfer Register[18] was also reviewed to identify any major industrial or waste management sources in the vicinity.

Operational Phase Assessment

Screening Assessment

3.3 Minor developments, on their own, are highly unlikely to cause significant increases in local air pollution concentrations. EPUK & IAQM guidance, therefore, advocates a two-stage screening approach. EPUK & IAQM guidance states that the impact of a proposal on air quality cannot be screened out, based on size alone, if there are:

- 10 or more residential units or a site area of more than 0.5ha; or
- 1,000 m^2 of floor space for all other uses or a site area greater than 1ha.

3.4 Coupled with any of the following:

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

3.5 At the second screening stage, EPUK & IAQM guidance provides indicative criteria which can be used to screen out the potential for significant impacts caused by a proposed development.

[15] Defra (2024) Background Mapping data for local authorities – 2021 [Accessed online: https://uk-air.defra.gov.uk/data/laqm-background-maps?year=2021]
[16] LBH (2025) Air Quality Annual Status Report for 2024
[17] Greater London Authority (2023) *London Atmospheric Emissions Inventory (LAEI) 2019*: https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2019
[18] Defra. *UK Pollutant Release and Transfer Register (PRTR) data sets*. [Accessed online: https://prtr.defra.gov.uk/pollutant-releases]

Ecological Receptors

3.6 Air quality assessments must also consider the impact of operational traffic on designated ecological sites, considering the sensitivity of the receptor and the predicted change in pollution concentrations. As there are no highly sensitive designated sites of ecological importance in proximity, further assessment of the proposal's impact on designated ecological receptors has been scoped out.

Sensitivity of Site

3.7 The proposal comprises commercial use and members of the public would not reasonably be expected to spend significant periods of time (e.g., an hour more than eighteen times a year) at the proposed development. As such, the AQSs for NO_2, PM_{10} or $PM_{2.5}$ do not apply at the Site. Nevertheless, it is recognised that it is common practice to assess commercial uses against the short-term AQSs to ensure a conservative approach and to minimise exposure to air pollution.

3.8 LAQM.TG 22 and AEA diffusion tube guidance[19] provides details of how pollution concentrations fall with increasing distance from sources. These criteria, in combination with the results of the baseline assessment have been used to determine whether an exceedance of any of the UK AQSs are likely across any part of the application site.

Air Quality Neutral Assessment

3.9 All developments, unless specifically excluded, are required to undertake an Air Quality Neutral assessment. Major development, and some minor development in AQFA, are required to calculate total emissions of NO_X and PM for both building and transport. However, most minor developments can follow a simplified assessment procedure.

3.10 An Air Quality Neutral assessment compares a proposed development against benchmarks for transport and building emissions. These benchmarks set out the maximum allowable emissions of NO_X and PM based on the size and use class of the proposed development. A development must be Air Quality Neutral for both transport and building emissions.

3.11 The Air Quality Neutral Guidance includes contextual information describing whether a development can be considered an excluded development:

[19] AEA Energy & Environment (2008) *Diffusion Tubes for Ambient NO2 Monitoring: Practical Guidance.*

> *"Developments, including major developments, that do not include additional emissions sources are assumed to be Air Quality Neutral and to meet the Air Quality Neutral benchmarks. As such, there is no need to do an AQN Assessment. This would include, for example, developments that have no additional motor vehicle parking, do not lead to an increase in motor vehicle movements, and do not include new combustion plant such as gas-fired boilers."*

3.12 As the proposal does not include a new source of combustion, the proposed development can be classified as Air Quality Neutral with respect to building emissions.

3.13 The proposed development seeks an extension to the existing permission and use, and it is understood that there will be no change in vehicle movements from the Site, nor parking spaces, if permission is granted. As such, the proposed development can be considered Air Quality Neutral as emissions are the same as the current permission.

Air Quality Positive Assessment

3.14 The LBH requires development in AQFAs to include an appropriate level of on-site air quality mitigation to fully offset its impact and achieve Air Quality Positive status. Where insufficient mitigation cannot be incorporated on-site, the LBH often requires a financial contribution to assist with the implementation of their AQAP.

3.15 As displayed in Figure 1.1, the proposal is not located within a GLA or LBH AQFA, and as such, is not required to be Air Quality Positive.

3.16 The operator has also stated that test drives avoid the South Ruislip A40/ AQFA, and as such, the proposal is not judged to be in the catchment of the AQFA. This is an operational practice confirmed by the operator and can be conditioned if required.

4 Baseline Conditions

4.1 A baseline assessment has been undertaken to provide a summary of the existing air quality environment in the local area.

Local Air Quality Management

4.2 The proposed development is located within the LBH's AQMA, which is declared due to exceedances of the annual mean AQS for NO_2.

Air Quality Focus Area

An Air Quality Focus Area (AQFA) is an area of known poor air quality and high human exposure. The proposed development is in proximity to the boundary of the *A40 / South Ruislip* AQFA. However, the location of the nearest sensitive use within the AQFA is over 350m away, and there are several junctions between the proposal and this use.

4.3 A map showing the location of the proposed development relative to the AQFAs is shown in Figure 1.1.

Industrial Sources

4.4 A review of the UK Pollutant Release and Transfer Register could not identify any industrial sources that would have the potential to significantly impact air quality in the vicinity of the proposed development.

4.5 The closest facility on the register, a SUEZ installation for the disposal of non-hazardous waste (Victoria Road Waste Transfer Station), is located 1.2km to the northeast.

DEFRA / UK-AIR

4.6 Defra provides predictions of annual mean concentrations of background NO_2, PM_{10} and $PM_{2.5}$, at 1km^2 resolution across the UK. A summary of the predictions for the grid square (511500, 184500) containing the application site for the years 2021-2028 are set out in Table 4.1 below.

Table 4:1: UK-AIR predicted background concentrations for the application site

Pollutant	Annual Mean Concentration (µg.m^{-3})							
	2021	2022	2023	2024	2025	2026	2027	2028
NO_2	17.9	16.6	15.3	14.6	14.1	13.5	12.9	12.5
PM_{10}	15.1	15.0	14.9	14.9	14.8	14.7	14.7	14.6
$PM_{2.5}$	8.4	8.3	8.2	8.2	8.1	8.0	7.9	7.9

4.7 The data in Table 4.1 show that background annual mean concentrations of NO_2, PM_{10} and $PM_{2.5}$ are predicted to be below their respective AQSs across the application site, in 2024. Background concentrations of $PM_{2.5}$ are also predicted to be below the Air Quality Target of 10 µg/m^3.

4.8 Predicted background concentrations of NO_2, PM_{10} and $PM_{2.5}$ are estimated to fall between 2021 and 2028. This is due to the gradual improvement of the UK fleet with vehicles with cleaner engines and local, regional, and national policy to reduce emissions across all sectors.

London Atmospheric Emissions Inventory

4.9 The London Atmospheric Emissions Inventory (LAEI) contains predictions for NO_2, PM_{10} and $PM_{2.5}$ across London, for the year 2022. The predictions for annual mean NO_2, PM_{10} and $PM_{2.5}$, and the number of exceedances of the 24-hour mean PM_{10} objective, for the Site's eastern boundary (511160, 184180) are provided in Table 4.2 below.

Table 4:2: LAEI concentrations and 24-hour mean exceedances.

Pollutant	Annual Mean Concentration (µg/m^3)	Number of Exceedances
NO_2	21.9	-
PM_{10}	14.7	3.0
$PM_{2.5}$	9.1	-

4.10 Annual mean concentrations of NO_2, PM_{10} and $PM_{2.5}$ were predicted to be below their relevant AQS at the Site, in 2022. Furthermore, the predicted number of daily exceedances of the 24-hour mean standard of 50 µg/m^3 at the Site was 3, which is below the objective by 32 days.

Local Authority Monitoring

4.11 Table 4.3 below summarises the most recently published LBH monitoring data within 1 km of the Site, including within the *A40 South Ruislip* AQFA.

Table 4:3: Annual Mean Concentrations of NO_2 and PM_{10}

Site ID	Type	Distance To Site (m)	Annual Mean Concentration (µg.m^{-3})/ Number of Exceedances					
			2019	2020	2021	2022	2023	2024
NO_2 (Annual Mean Concentration)								
HI1	Roadside	707	34	25	27	28	24	20

HIL03	Roadside	725	35.5	26.7	27.3	30.0	24.2	19.8
NO_2 (Number of Exceedances of 200 µg/m^3)								
HI1	Roadside	707	0	0	0	0	0	0
PM_{10} (Annual Mean Concentration)								
HI1	Roadside	707	17	17	18	17	19	18
PM_{10}(Number of 24-hour mean exceedances of 50 µg/m^3)								
HI1	Roadside	707	3	1	0	4	1	0
Bold denotes exceedance of annual mean AQS.								

4.12 Measured annual mean concentrations of NO_2 and PM_{10} have been below their respective annual mean AQSs at the monitoring stations within 1km of the site, since 2019.

4.13 The annual mean concentrations of NO_2, in Table 4.3, show a strong downward trend between 2019 and 2024, likely as a result of measures such as the low emission zone and the ultra-low emission zone. Measured annual mean concentrations of PM_{10} in the AQFA, nevertheless, have remained consistent between 2019 and 2024.

5 Operational Phase Assessment

Impact Assessment

5.1 The current use of the Site as a car sales facility generates approximately 26 car trips per day. Of note, the test drives also avoid the South Ruislip A40/ AQFA.

5.2 The proposal seeks an extension to the temporary permission to conduct Sui Generis car sales on-site. Permission for this use was granted in 2024 and as such, there will be no increase in vehicle movements associated with the Site, compared to the consented permission.

5.3 It can therefore be concluded that the proposed development would have no significant effect on local air quality.

Sensitivity

5.4 As set out in section 3.8, the UK AQSs do not apply at locations where members of the public would not reasonably spend periods of time approaching the averaging period for that standard. The commercial use is not a location where a member of the public would spend more than 24 hours, at one time, more than 35 times in a year (for comparison with the daily standard for PM_{10}) or more than 18 times in a year for an hour each time. As such the respective hourly mean and daily maximum mean AQSs for NO_2 and PM_{10} do not apply at the proposed development.

5.5 Nevertheless, it is recognised that it is common practice to assess a commercial building against these standards to ensure a conservative approach and to minimise exposure to air pollution. The LAEI predictions for 2022 suggest that air pollution concentrations at the application site are and will continue to be below the short-term air quality standards. This is supported by local monitoring data which shows a strong downward trend. As such, it is considered highly likely that concentrations of NO_2 and PM_{10} are below the short-term AQSs across the application site, and that the Site is suitable for the continuation of the commercial use.

Air Quality Neutral

5.6 The proposed development does not introduce any new combustion plant, will not increase traffic movements to or from the Site, and does not provide additional car parking. On this basis, the proposal is Air Quality Neutral with respect to both transport and building emissions.

Mitigation

5.7 As the proposed development will have no significant impact on air quality and is Air Quality Neutral, no specific mitigation measures are required.

5.8 However, the NPPF requires development to identify opportunities to improve air quality, and LBH policy *DMEI 14: Air Quality* states that developments in AQMAs should actively contribute to improving air quality.

5.9 Three birch trees will, therefore, be planted across the Site to contribute to air quality improvements. This mitigation mimics the package that was agreed previously for the Site (2216/APP/2024/562) and the species was chosen for its high Urban Tree Air Quality Score[20].

[20] Donovan et al. (2005) in Woodland Trust (2012) Urban Air Quality.

6 Discussion

6.1 Local and National Air Quality policies seek to sustain compliance with national objectives and limit values, and to prevent new development from contributing to, or being put at unacceptable risk, from unacceptable levels of air pollution. Furthermore, a key theme of the NPPF and LBH Local Plan requires development to identify opportunities to improve air quality.

6.2 A review of the baseline air quality conditions was undertaken, with reference to data provided by Defra/UK-AIR, the LAEI, and the LBH. Whilst air quality in Hillingdon can be poor, concentrations of NO_2, PM_{10} and $PM_{2.5}$ at the application site, and in the neighbouring AQFA are predicted to be below the relevant AQSs. There is also strong evidence of a downward trend in NO_2 concentrations.

6.3 The planning application seeks permission for the extension of the temporary use of the Site for car sales. This use is established and as such, the proposed development will not result in any change in vehicular movements or emissions. As such, the proposal will have no impact on local air quality.

6.4 The proposed development includes no additional source of combustion, nor increases parking provision or vehicular trips from the Site. As such, it is Air Quality Neutral.

6.5 Mitigation is nonetheless provided to ‘actively contribute’ to the improvement of environmental conditions. Birch trees are proposed as they have a high urban tree air quality score—combining the ability to remove pollution from the atmosphere with low levels of biological volatile organic compound (VOC) emissions. The package was deemed suitable as the impact of the proposed development is neutral, and it mimics the package that was previously agreed with LBH for the first temporary permission on the Site.

6.6 The operator is also understood to avoid test drives in the A40 AQFA. This is an operational practice confirmed by the operator and can be conditioned if required.

7 Conclusion

7.1 Greenavon Ltd was commissioned by Arora Management Services Limited to undertake an Air Quality Assessment to support a full planning application to the London Borough of Hillingdon (LBH) for the extension of the temporary permission for the partial change of use of the C&L Country Club, West End Rd, Hayes, Northolt UB5 6RD (the Site).

7.2 Existing and future concentrations of pollutants across the proposed development are predicted to be below the relevant air quality standards, and therefore the application site is considered suitable for the continuation of the use.

7.3 The assessment concludes that during the operational phase, the proposed development would have no significant impact on local air quality and is Air Quality Neutral.

7.4 The proposed development is judged to actively contribute to improving air quality through the planting of three trees which are beneficial to air quality in urban environments.

7.5 Considering the above, the proposed development is considered compliant with all local and national air quality policies. Air quality should not, therefore, present a material constraint to the planning process.

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