



Applicant Response to GLA (Air Quality)

Planning Application Reference 2382/APP/2023/2906
Broadwater Lake, Moorhall Road, Harefield, UB9 6PE

Post Stage 1 Comment (09/02/2025)	Applicant Response
<p>An update was provided on the biodiversity air quality assessment submitted in 2023. This update states that since the assessment was undertaken, the NPPF was updated, updated versions of the tools used in the assessment were released and some changes were made to the proposed development. The assessment carried out in 2023 is considered now conservative given that the emissions and background concentrations are now reduced at all links except one.</p> <p>This link experienced an increase in emissions due to traffic lights from HS2 works. The compounds for these works are now being decommissioned so it has been assumed the traffic lights are being decommissioned which will result in a reduction in ammonia emissions. The applicant should confirm this assumption to ensure that there are no new potential negative impacts on ecological receptors.</p>	<p>In relation to the A412 close to the construction compound, the addendum states:</p> <p><i>"Only a very small section in the northwest corner of the SSSI would experience an increase in impacts as presented in the appended assessment; much of this area is already occupied by the compound, which is it understood is now being decommissioned. It is not known whether the traffic lights will remain, but it would be reasonable to assume that they will also be decommissioned. If so, the traffic speeds will increase on that road link, and the emissions of ammonia from traffic, as calculated using CREAM V2A, will reduce."</i></p> <p>The traffic lights are still in place. HS2 are rapidly withdrawing from the site, so by the time construction starts, the HS2 civils will be completed and the lights will be removed. The removal of the traffic lights will result in lower ammonia emissions than assumed in the modelling and there will be no new negative impacts on ecological receptors (i.e. the modelling presents a worst-case scenario).</p>



Note continued

<p>A Dust Risk Assessment was undertaken. The risk level for the site was determined to be Medium to Negligible. The scale of each stage was correctly identified but it is unclear whether the sensitivity of the area for each stage has been correctly identified as the areas shown in figure 6-3 does not match the description in paragraph 6.12.</p>	<p>Paragraph 6.12 describes the construction activities; Figure 6-3 shows the area within which there are receptors within 50 m of the construction works.</p> <p>The area around the main buildings and pontoon construction was not shown as there are no receptors (except for the SSSI itself) within 50m of the construction of those structures. There is a car park within 100m. This does not change the sensitivity of the area as set out in the report. The construction areas that are not shown in the report, and the 50m and 100m distance bands around them are shown in the image appended at Document 1.</p>
<p>It is not clear if the risk for each stage has been defined correctly, in particular for ecology sites as it has not been stated where the sensitive ecological sites are located. The number of sensitive receptors within each distance band have not been discussed while assessing the dust soiling and human health risks.</p>	<p>For ecological impacts, the guidance only requires consideration of ecological sites within 50m of the dust sources. The site is within the Mid Colne Valley SSSI. We are not aware of any other ecological sites that are within 50m of the site or trackout routes.</p> <p>The only way that the sensitivity of the area would be "high" would be if there were internationally designated sites within 20m, which there are not (see Table A2-5 in Appendix A2).</p> <p>For dust soiling and human health receptors, the numbers of receptors are discussed in Paragraphs 6.17, 6.18 and 6.19; considering receptors at distances further from the sources than explicitly considered within the assessment would not alter the sensitivity of the area / the outcome of the assessment.</p>
<p>An Air Quality Positive Assessment was included with the report. A singular measure was included for both "better design and reducing exposure" and "building emissions" in the AQP matrix, while no measures were included for "innovation and future proofing". The AQP</p>	<p>The guidance states that "<i>Where innovative approaches are being considered, it will be beneficial to consult on these in detail with the local planning authority at an early stage.</i>" There are no measures to be included under this heading at this stage.</p>



Note continued

<p>statement did not include any details about the implementation or monitoring of these measures.</p>	<p>The measures listed in the AQP statement are those that will be included in the design, or travel, logistics and delivery and servicing plans that have been submitted as part of the planning application. These documents incorporate their own monitoring as required and the AQP statement confirms how these measures will be secured.</p>
<p>It is not clear if the development includes backup life-safety generators. The locations of flues for any life-safety diesel generators will need to be considered to avoid impacts during testing and maintenance at both existing and introduced receptors. A detailed assessment of emissions may be required where optimal flue locations are not achievable (e.g. tallest part of the structure). It should be confirmed whether a backup generator will be present, and if so, whether assessment will be required if it is potentially significant.</p>	<p>The energy plant will include connections for generators, but will not come fitted with generators.</p>
<p>Recommended Conditions</p>	
<p>All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and</p>	<p>The Applicant has agreed to this planning condition.</p>



Note continued

<p>Emissions During Construction and Demolition” dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register.</p>	
<p>Measures to control emissions during the demolition and construction phase relevant to a Medium risk site should be written into an Air Quality and Dust Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG. The AQDMP should be approved by the LPA and the measures and monitoring protocols implemented throughout the construction phase (London Plan Policy SI 1 (D)).</p>	<p>Condition No. 18 as currently drafted requires the submission of a Construction & Environmental Management Plan. Criterion (i) requires the submission of air quality mitigation measures, including dust suppression, and measures to control the emission of dust and dirt during construction, in line with the requirements of the Control and Dust and Emissions during Construction and Demolition SPG.</p>
<p>The number of parking spaces must not exceed that accounted for in the submitted air quality neutral calculation</p>	<p>The Air Quality Neutral Calculation has been based on the car parking figures set out in the Transport Assessment, prepared by Robert West. The Transport Assessment confirms that 56 car parking spaces are proposed, of which 42 are standard parking bays, six are disabled parking bays and six and electric vehicle parking bays.</p>



Note continued

	<p>Planning Condition No. 36 as currently drafted requires the submission of a Landscape Scheme to the Local Planning Authority for approval, prior to the commencement of works above ground level. Criterion 2(e) requires the submission of a final car parking layout, including 56 car parking spaces, of which of which 42 are standard parking bays, six are disabled parking bays and six and electric vehicle parking bays. The condition also requires compliance with the details, once approved.</p>
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Document 1

AIR QUALITY PLAN

