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# AIR QUALITY MANAGEMENT PLAN

966 UXBRIDGE ROAD, HAYES

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## Document Control

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## Quality Management

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V1	17/03/2023	Draft for client comment	

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# 1 Introduction

## Background

- 1.1 Greenavon was appointed by You Architecture Ltd to provide an Air Quality Management Plan for the proposed redevelopment of 966 Uxbridge Road, Hayes.
- 1.2 The application comprises the conversion of the property into 1 x 1-bed and 1 x 2-bed self-contained flats, with associated amenity space and the erection of a first-floor rear extension, rear dormer and balcony.
- 1.3 The planning application (28530/APP/2022/3892) has been granted by the London Borough of Hillingdon, the local planning authority, subject to conditions. Condition 6 of the decision notice stated:

*"No development approved by this permission shall be commenced until an air quality management plan has been submitted to and approved in writing by the Local Planning Authority. The plan shall demonstrate that the development will be at least air quality neutral. Works shall be carried out in accordance with the approved details and thereafter maintained".*

- 1.4 This Air Quality Management Plan provides the necessary information to discharge Condition 6.
- 1.5 Appendix A also includes a list of the 'highly recommended' measures to control dust emissions from low-risk sites, from the Greater London Authority's guidance on the *"The Control Of Dust And Emissions During Construction And Demolition"*. Some of these measures could be implemented to support the discharge of condition 3.

# 2 Air Quality Neutral Assessment

## Methodology and Guidance

- 2.1 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<sub>x</sub> 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.
- 2.2 Guidance on the benchmarks and how to conduct an AQNA are provided by the Greater London Authority<sup>1</sup>.
- 2.3 All development, unless specifically excluded, are required to undertake an Air Quality Neutral Assessment. Major development, and all development in AQFA, are required to calculate total emissions of NO<sub>x</sub> and PM for both building and transport. However, minor developments can follow a simplified assessment procedure, in most cases.

## Local Air Quality Management

- 2.4 The proposed development is located within the LBH's Air Quality Management Area (AQMA), which is declared for exceedances of the annual mean AQS for nitrogen dioxide (NO<sub>2</sub>).

## Air Quality Focus Area

- 2.5 The proposed development is located within the Uxbridge Road Corridor Air Quality Focus Area (AQFA). AQFAs are areas of known poor air quality and high levels of residential exposure. As the proposal is in an AQFA, GLA guidance suggests the more detailed air quality neutral assessment method may be required.

## Building Emissions

- 2.6 A minor development can be classified as air quality neutral with respect to building emissions if the new heating system meets any of the following criterion:
  - the new heating system is a heat pump or other zero-emission heat source.
  - the new heating system includes one or more individual gas boilers with NO<sub>x</sub> emissions rated at less than 40 mg/kWh.
  - the development is connecting to an existing heat network.
- 2.7 The proposed development's heating strategy is all electric and therefore it can be considered air quality neutral with respect to building emissions, despite its location within an AQFA.

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<sup>1</sup> GLA (2023) Air Quality Neutral London Plan Guidance [online: <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/air-quality-neutral-aqn-guidance>]

## Transport Emissions

- 2.8 A minor development can be classified as air quality neutral with respect to transport emissions if they do not exceed the maximum parking standards set out in policies T6 and T6.1 to T6.5 of the London Plan. The parking standards depend on the site's PTAL score and whether it is in Outer or Inner London.
- 2.9 The LBH is in Outer London and the proposed development has a PTAL score of 3<sup>2</sup>. In line with London Plan Policy T6.1, the proposal could have 1.5 car parking spaces and still be classified as air quality neutral.
- 2.10 The proposed development is car free and therefore can be concluded to be air quality neutral with respect to transport emissions, despite being located within an AQFA.

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<sup>2</sup> TFL – WebCAT. Available online: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

## 3 Conclusions

- 3.1 Greenavon was appointed by You Architecture Ltd to provide an Air Quality Management Plan to discharge Condition 6 of the permission for the redevelopment of 966 Uxbridge Road, Hayes.
- 3.2 Condition 6 required that the Air Quality Management Plan demonstrate that the development will be at least air quality neutral.
- 3.3 The proposed development is car free and includes an all-electric energy strategy and will, therefore, be air quality neutral with respect to building and transport emissions.
- 3.4 This Air Quality Management Plan includes the necessary information to discharge Condition 6. The proposal is therefore considered compliant with all national and local air quality policy.

## Appendix A: Dust Mitigation Measures

Table A.1 includes the highly recommended dust mitigation measures for low-risk sites, taken from the Greater London Authority's guidance on *"The Control Of Dust And Emissions During Construction And Demolition*. Whilst many of the measures listed in Table A.1 are considered inappropriate for a development of the proposal's size. The principles could be adapted to aid the discharge of condition 3.

**Table A.1: Highly Recommended Dust Mitigation Measures for Low-Risk Sites**

Phase	Measure
Site management	Display the name and contact details of person(s) accountable for air quality pollutant emissions and dust issues on the site boundary.
	Display the head or regional office contact information.
	Record and respond to all dust and air quality pollutant emissions complaints.
	Make a complaints' log available to the local authority when asked
	Carry out regular site inspections to monitor compliance with air quality and dust control procedures, record inspection results, and make 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.
Preparing and maintaining the site	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 logbook.
	Plan site layout: machinery and dust causing activities should be located away from receptors.
	Erect solid screens or barriers around dust activities or the site boundary that are, at least, as high as any stockpiles on site.
Operating vehicle/machinery and sustainable travel	Avoid site runoff of water or mud
	Ensure all on-road vehicles comply with the requirements of the London Low Emission Zone
	Ensure all non-road mobile machinery (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	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
	Ensure an adequate water supply on the site for effective dust/particulate matter mitigation (using recycled water where possible)
	Use enclosed chutes, conveyors and covered skips
	Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate
Waste management	Reuse and recycle waste to reduce dust from waste materials
	Avoid bonfires and burning of waste materials.

