

TAVISTOCK WORKS, LONDON LOW EMISSION STRATEGY

MARCH 2026



AIR – ODOUR - CLIMATE

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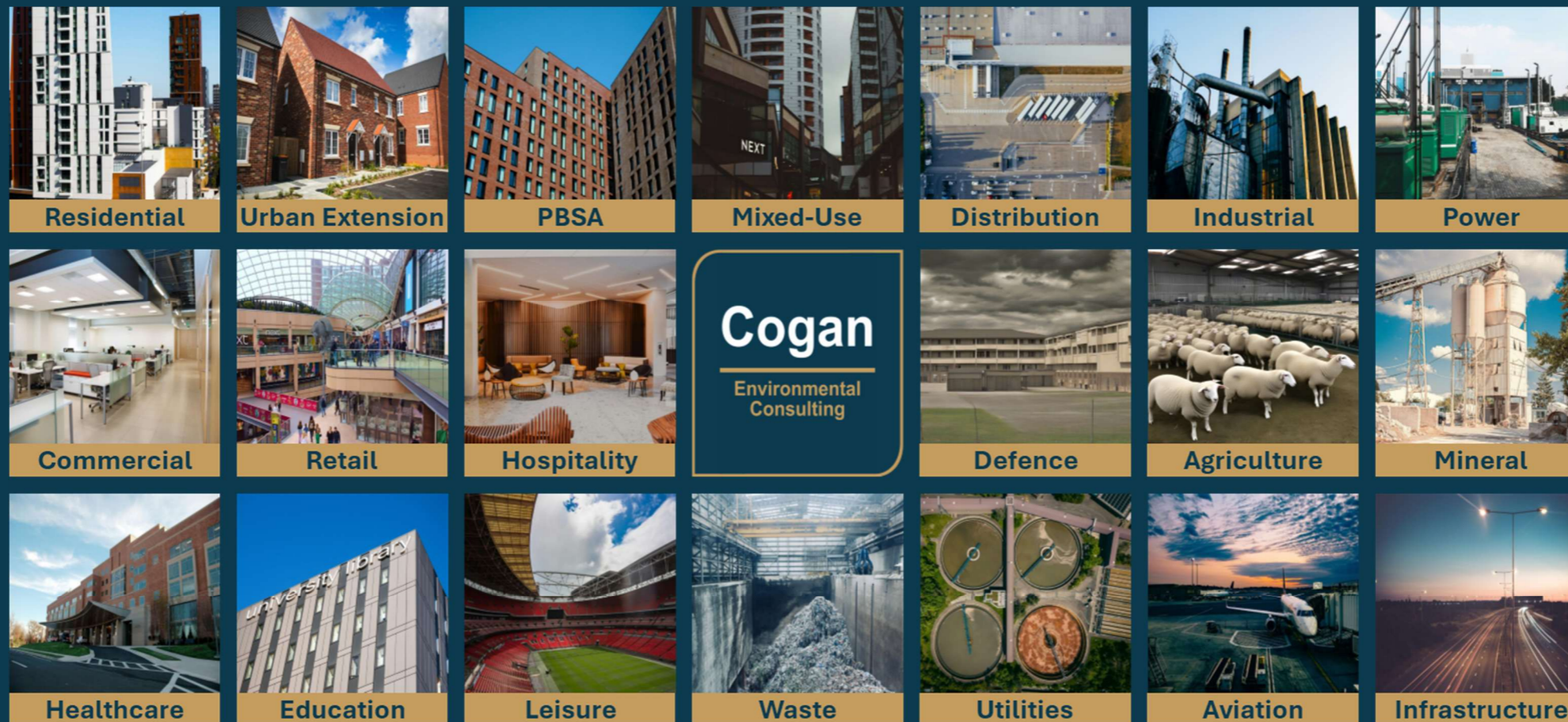
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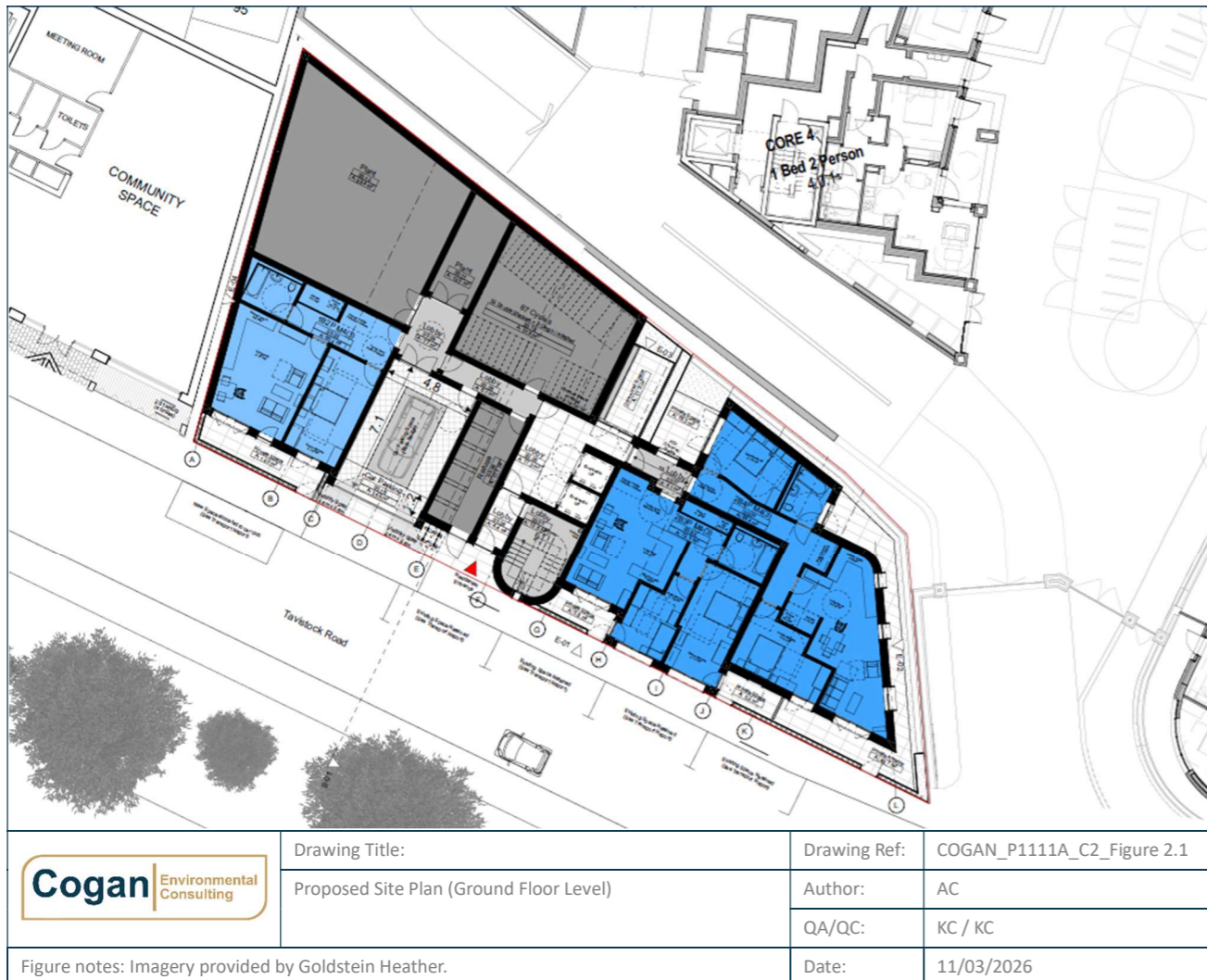
1 Introduction

1.1 Cogan Environmental Consulting Limited has been commissioned to produce a low emission strategy for Tavistock Works, Hillingdon (herein called the 'Proposed Development'). This low emission strategy describes the measures to that will be applied to minimise air pollutant emissions during both the demolition and construction phase and operational phase of the Proposed Development.

2 Proposed Development

2.1 The Proposed Development comprises demolition of existing building and replacement with 6-storey building comprising residential units, landscaping and amenity space. The proposed site plan is shown in Figure 2.1.

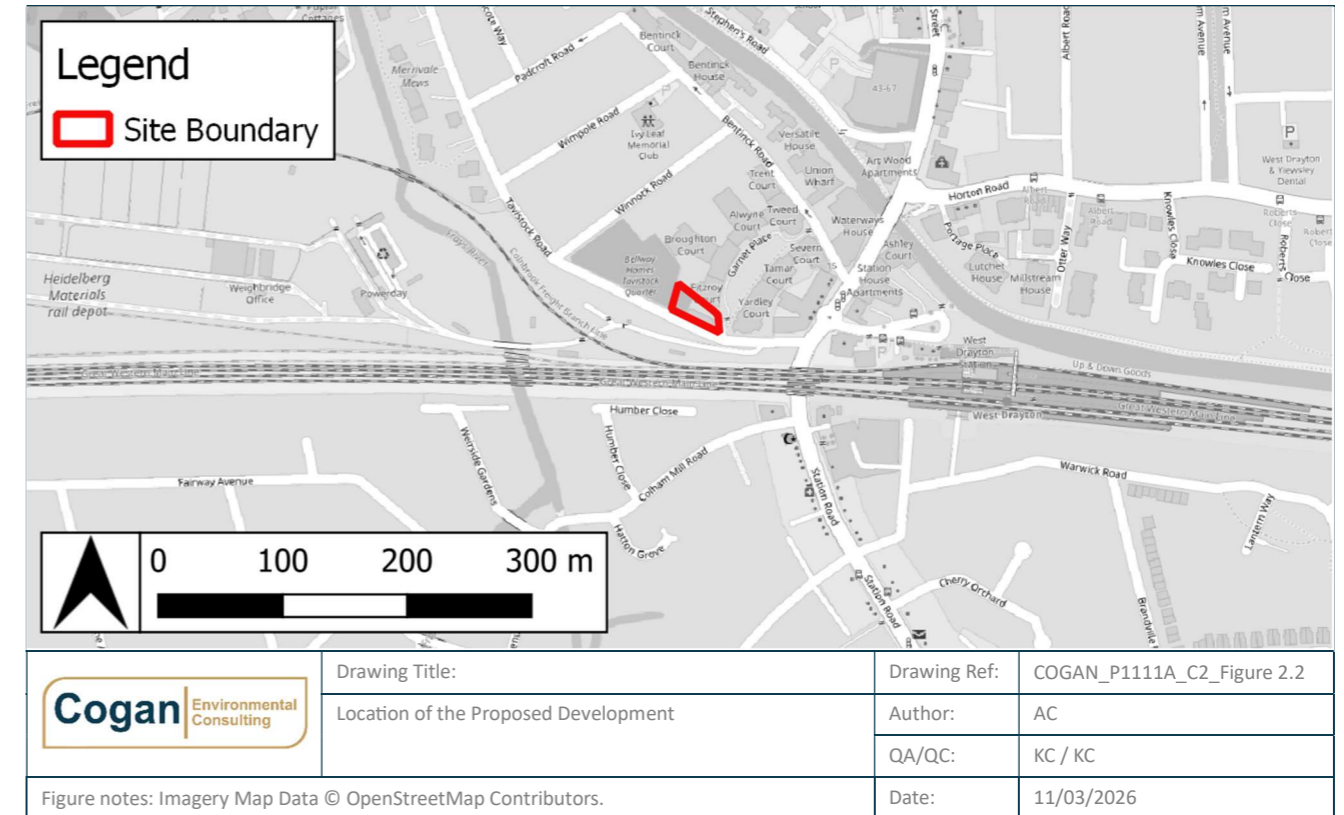
Figure 2.1: Proposed Site Plan (Ground Floor Level)



2.2 The application site is situated towards the southwest central portion of Hillingdon and is currently a small car park and building on the corner of Tavistock Works and Garnet Place. It is surrounded to the north and east by

high rise residential properties, to the west by a portion of land owned by Bellway Homes, and to the south by Tavistock Road and a railway. The location of the application site is shown in Figure 2.2.

Figure 2.2: Location of the Proposed Development



3 Low Emission Strategy

3.1 The Low Emission Strategy sets out the measures and management strategies that will be implemented in order to minimise air pollutant emissions associated with the Proposed Development.

Minimising Construction Emissions

3.2 During the demolition and construction phase a package of mitigation measures will be implemented to minimise dust emissions and continuous measurements will be undertaken to monitor dust levels and take remedial action as necessary. Details of the mitigation measures are set out in the Air Quality Assessment¹ submitted with the application. The key measures restricting the generation of emissions include:

- Ensuring all vehicles switch off engines when stationary – no idling vehicles.
- Avoiding the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable.

¹ Cogan Environmental Consulting Limited (2026). Tavistock Works, London, Air Quality Assessment, Report Reference: COGAN_P1111A_A2.

- Implementing a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).
- Ensuring all on-road vehicles comply with the requirements of the London Low Emission Zone and the London NRMM standards, where applicable.
- Suppressing dust emissions using water-based techniques and sheeting (such as Monarflex).

3.3 A Dust Management Plan (DMP) has also been produced² that sets out the site management measures to record and respond to all dust and air quality pollutant emissions complaints, make a complaint log available, record any exceptional incidents that cause dust and air quality pollutant emissions, and set out the strategy for daily visual dust inspections and continuous PM₁₀ monitoring. Regular site inspections will be carried out to monitor compliance with the DMP, including recording inspection results and making inspection logs available to the Council.

Minimising Building Emissions

3.4 The Proposed Development will operate as a gas-free building, relying on electrically powered systems and will therefore use a zero emission system. The energy strategy for the Proposed Development is Air Source Heat Pumps (ASHP) and Mechanical Ventilation with Heat Recovery (MVHR) which will provide heating/cooling and hot water. There will be no fossil fuel combustion onsite and no emergency diesel generators/pumps. The Proposed Development will therefore be air quality neutral with respect to building-related emissions.

3.5 The apartments will be occupied by residents, and not a commercial business. Hence no operations have potential to produce or emit potential air pollutants. The residential kitchens will also be gas-free and will therefore not include any combustion appliances.

Minimising Transport Emissions

3.6 The development will have only one dedicated blue badge car parking space and there is limited on-street parking. The Proposed Development will be 'car-free' and air quality neutral in terms of transport emissions.

3.7 The application site benefits from easy access to nearby amenities in the local area, helping to minimise vehicular trips and associated emissions.

3.8 No electric vehicle charging provision is included in the design as the site only includes a single disabled parking space. The Proposed Development does, however, nevertheless comply with Requirement S1 from Part S of The Building Regulations 2010³ and the London Plan⁴ with regard to electric charging provision.

3.9 A Travel Plan has been produced to support the application, setting out details of transport measures.

3.10 The Proposed Development will include the provision of a Travel Plan Coordinator (TPC). A Home Administrator will be appointed, whose duties will also include that of the TPC. The Home Administrator/TPC role will be appointed prior to development occupation and will be responsible for managing and implementing the Travel Plan. This will include:

- Baseline travel surveys conducted within 6-months of building occupation;
- Day to day liaison with residents on travel matters;
- Implementation of Travel Plan measures;
- Managing travel information;
- Distribution of a transportation pack to new residents and visitors;
- Promoting non-car travel through Travel Plan measures;
- Reporting progress to any Travel Plan stakeholders, including the London Borough of Hillingdon upon request; and
- Managing the monitoring and progress of the Travel Plan targets.

3.11 Every resident will be provided with a Residential Travel Pack promoting sustainable modes of transport and key services provided through the Travel Plan. The pack will contain information on the facilities within the development and nearby, including information on:

- Access initiatives;
- Journey planner tools;
- Key services and facilities;
- Health benefits of sustainable travel;
- Working from home; and
- How to join car clubs etc.

Promoting Sustainable Transport

3.12 Due to location and parking restrictions, most visitors would likely use public transport or walking/cycling, helping to minimise transport emissions.

3.13 The site benefits from close access to West Drayton Train Station and West Drayton Bus and Coach Station, both of which are located within a short walking distance from the Proposed Development. Given this proximity, the use of public transport will be strongly encouraged to future residents.

² Cogan Environmental Consulting Limited (2026). Tavistock Works, London, Dust Management Plan, Report Reference: COGAN_P1111A_B1.

³ HM Government (2021). The Building Regulations 2010, Infrastructure for the charging of electric vehicles, APPROVED DOCUMENT S.

⁴ GLA. (2021). The London Plan, The Spatial Development Strategy for Greater London.

3.14 The Proposed Development includes pedestrian and cycle access, helping to promote sustainable modes of transportation.

3.15 The Proposed Development has been designed to incorporate a significant cycle infrastructure. This includes 67 secure cycle storage spaces internally (including 32 double stackers and 3 cargo/adapted stands) and 4 short stay (Sheffield stands) for visitors.

3.16 Future residents will be provided with a comprehensive Residential Travel Pack that will provide information on topics such as:

- The nearest electric vehicle charging point,
- Public transportation route maps;
- School Walking Maps;
- Car clubs;
- Bike/E-bike and scooter rentals; and
- The London cycle campaign, which promotes cycling locally, improves conditions for cyclists in their borough, organises leisure rides and social events. Benefits include:
 - Discounts at bike shops;
 - Exclusive cycle theft insurance packages;
 - Free third-party insurance for damage or injury up to the value of £1m; and
 - Access to local LCC borough groups with free legal advice.

3.17 The Travel Plan Coordinator will also:

- Act as a point of contact for users who may be concerned about the condition of local pedestrian routes and liaise with the highway authority to ensure necessary maintenance/improvements;
- Organise participation amongst site users in promotional events such as ‘Walk to Work Week’;
- Provision of information relevant to local pedestrian routes to the nearest facilities and / or public transport nodes;
- Engage with local residents over establishing a walking bus from the site to nearby primary schools;
- Provide information on local cycle routes (including route planning) in the vicinity of the application site;
- Invite site users to join a Bike User Group (BUG), allowing less experienced cyclists or those who are not confident in their route to gain experience by cycling with more experienced cyclists;
- Use reasonable endeavours to obtain a discount for site users at a local bicycle shop;
- Organise participation in promotional events such as ‘Bike to Work Week’;

- Provide basic cycle repair equipment on-site;
- Act as a point of contact for site users who may have concerns about local public transport services;
- Provide information on public transport stops, routes, timetables, and fares from the application site, including advertising service changes; and
- Provide personalised journey planners, and if appropriate, journey planning facilities; and
- Organise an annual car sharing event for on-site residents to promote the use of car sharing.

Promoting Green Infrastructure

3.18 The Proposed Development has been designed to ensure adequate, appropriate, and well located green space and infrastructure have been incorporated. This includes:

- Ground-level vegetative planting;
- First-floor terrace including communal space with vegetative planting and six trees, and a green roof; and
- Sixth-floor roof terrace including communal space with vegetative planting including trees, and a biodiverse seeded extensive green roof.

Minimising Emission Exposure

3.19 By nature of the application site location, the proposed apartments are set back away from main roads and sufficiently away from railways to minimise the risk of exposure to local sources of pollution.

3.20 The railway to the south of Tavistock Road is serviced by the Elizabeth Line which is fully electrified. At its closest point, the Proposed Development is set back from the railway by 28 m. Given it is electrified, there is considered to be limited risk of emissions from this upon air quality at the Proposed Development.

3.21 Fresh air will be provided actively to the building via mechanical ventilation, with the air inlets located at the roof, well away from local sources of pollutant emissions.

3.22 Welcome Packs will be supplied to residents and will contain information on air quality, school walking routes, local public transport facilities, promotion of sustainable travel and health benefits of active travel. This will include promoting air pollution forecasting and route planner tools, such as AirTEXT, Mayor’s pollution forecasts, and Walking Maps for schools.

Strategic Level Emission Reductions

3.23 Measures to reduce pollutant emissions are principally being delivered in the longer term by the introduction of more stringent emissions standards, largely via UK law. Furthermore, the Government, the Greater London Authority, and the London Borough of Hillingdon are working on improving air quality under the relevant air

quality strategies and the LAQM regime. The measures set out in the Air Quality Action Plan⁵ for Hillingdon include numerous measures to reduce emissions and improve local air quality, benefiting future residents in the near future.

Delivery Plan

3.24 The delivery plan, responsibilities and monitoring of each of the measures included within this Low Emission Strategy are summarised below in Table 3.1.

Table 3.1: Low Emission Strategy Delivery Plan

Measure	Responsibility	Timeline	Monitoring
Minimising Construction Emissions	Developer and Construction Contractors	During the demolition and construction phase	Implementation of the Dust Management Plan
Minimising Building Emissions	Developer	Prior to first occupation	Evidence at planning stage
Minimising Transport Emissions	Developer and Travel Plan Coordinator	Prior to first occupation Annual, within 5 year lifetime of Travel Plan	Evidence at planning stage, evidence upon first occupation, and evidence annually within 5 year lifetime of Travel Plan
Promoting Sustainable Transport	Developer and Travel Plan Coordinator	Prior to first occupation Annual, within 5 year lifetime of Travel Plan	Evidence at planning stage, evidence upon first occupation, and evidence annually within 5 year lifetime of Travel Plan
Promoting Green Infrastructure	Developer	Prior to first occupation	Evidence at planning stage
Minimising Emission Exposure	Developer	Prior to first occupation	Evidence at planning stage
Strategic Level Emission Reductions	Government, Greater London Authority, London Borough of Hillingdon	Throughout lifetime of Proposed Development	N/A

4 Conclusion

4.1 The above Low Emission Strategy is considered appropriate for the Proposed Development, given the size and nature of the site and is predicted to control and minimise emissions as far as reasonably practicable.

⁵ London Borough of Hillingdon (2025). London Borough of Hillingdon Air Quality Action Plan 2025 – 2030, Pre-consultation Draft [approved and effective since 3/04/2025]



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Cogan Environmental Consulting Limited is an independent environmental consultancy providing customer focused expert help to developers, planners, architects, industrial operators, farmers, public bodies, NGOs, lawyers and other businesses. Having supported over a thousand projects throughout our team’s careers, we are well placed to provide experienced air quality, odour and climate support for a diverse range of sectors.

Our company is a family business, putting value in reputation and legacy and fostering strong long-term relationships with clients. Our culture of integrity and accountability enables trust. As a small business we gain a deeper understanding of client’s specific context, enabling highly tailored and client-focused services, with flexible and adaptive solutions. With direct access to experienced consultants, clients are provided with high levels of care, pride, and dedication, as well as faster decision making and project timescales. With our niche expertise, clients benefit from our deep understanding and are provided with relevant and practical advice.

AIR QUALITY	ODOUR	CLIMATE
<ul style="list-style-type: none"> Air Quality Assessments for Planning and EIAs Feasibility Risk Assessments Air Quality Neutral Assessments Air Quality Positive Statements Air Quality Monitoring Surveys Planning Condition Support Ventilation Strategies Emission Mitigation Statements Damage Cost Assessments Air Quality Dust Management Plans (AQDMP) Dust Monitoring Expert Witness Services Technical Review Services LAQM Technical Support and Clean Air Zones Air Emissions Risk Assessments (Environmental Permitting) Infrastructure Assessments Indoor Air Quality Support (BREEAM, HQM, WELL, DREAM) COSHH Surveys (Air, Fumes, Dust, Bioaerosols) 	<ul style="list-style-type: none"> Odour Assessments for Planning Nuisance Complaint Support Commercial Kitchen Risk Assessments Environmental Permitting Support Odour Management and Control Public Sector Services Expert Witness Services Technical Review Services Qualitative Desktop Assessments Field Odour Surveys (‘Sniff-Tests’) Odour Dispersion Modelling Odour Monitoring / Sampling Kitchen Risk Assessments Council, Regulator and Consultee Liaison Odour Abatement Advice Odour Management Plans 	<ul style="list-style-type: none"> Greenhouse Gas Calculations and Assessments for Planning Greenhouse Gas ES Chapters Greenhouse Gas Monitoring Surveys H1 Calculations for Environmental Permitting UK ETS Advice Resilience and Adaptation ES Chapters Climate Management Plans Expert Witness Services Technical Review Services Net Zero Carbon Assessments for Planning Net Zero Plans for Planning Business Carbon Footprints Business Net Zero Assessments Business Net Zero Plans Business Climate Risk Assessments Business Climate Adaptation Plans
GENERAL ENVIRONMENTAL		
<ul style="list-style-type: none"> Construction Environmental Management Plans (CEMP) Environmental Permitting Applications and Management Meteorological Monitoring Surveys and Data Provision 		

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