

Memorandum

To	Hillingdon Council	From	Savills Planning
Date	8 December 2025		
Cc:	Vantive Limited	Ref.	M251208 Technical Addendum

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PLANNING APPLICATION REFERENCE: 43411/APP/2025/2140
1 HEATHROW BOULEVARD, 286 BATH ROAD, SIPSON
TECHNICAL NOTE

This technical note responds to Hillingdon Council's request for a financial contribution towards air quality mitigation in connection with the planning application at 1 Heathrow Boulevard.

It follows a meeting between the Applicant team, Christos Chrysanthou (Planning Officer) and Anabela Grossinho (Air Quality Consultant) on 5 December 2025 and provides additional information to form the basis for calculating and agreeing any contribution.

Policy Context

National and local planning policy establishes clear requirements for addressing air quality impacts.

NPPF paragraph 186 states that planning decisions should ensure developments do not contribute to unacceptable levels of air pollution and that obligations must meet the tests of necessity, proportionality, and reasonableness.

London Plan Policy SI1 requires developments to be Air Quality Neutral and, where this cannot be achieved, to provide mitigation measures or financial contributions.

The associated Air Quality Neutral London Plan Guidance (February 2023) states that an Air Quality Neutral development is one that meets, or improves upon, defined benchmarks.

Paragraph 2.2.1 of the guidance states "*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 movements¹, and do not include new combustion plant such as gas-fired boilers*".

Hillingdon Local Plan policies EM8 and DMEI 14 reinforce the need to protect air quality, particularly within or near Air Quality Management Areas (AQMAAs).

The Hillingdon Air Quality SPD also provides detailed guidance on calculating contributions where neutrality cannot be demonstrated.

In summary, where a development introduces residual impacts that cannot be fully mitigated onsite, a financial contribution is considered necessary to offset those impacts in line with these policies.

Development Overview

The proposed development relates to the change of use of 728 sq. m (GIA) existing floorspace at 1 Heathrow Boulevard from office (Class E) to a bespoke mixed use office / healthcare education / training facility (Sui Generis).

No changes are proposed to the access, parking or servicing arrangements however the proposals seeks to introduce 2x EV bays within the existing surface car park. In addition, 16no cycle spaces will be provided.

As originally presented, the proposed operation seeks to provide essential training for individuals who require kidney dialysis. Once trained the service users are able to do self-dialysis in the privacy of their own homes thus reducing number of visits required to Hospital.

The proposed facility will accommodate a maximum of 10 service users during any one session. A typical training course would take place between 9am and 4pm (Mon-Fri) over the course of 3 days. Certain treatments may require more complicated instruction and so the ability to stay overnight (up to 5 rooms) is also offered. No training or associated overnight stays takes place at weekends.

Within the training areas, there will be up to 5no staff members between the hours of 07:00 – 19:00 plus an additional 1no staff member to cover the night time shift between 19:00 – 07:00.

A further 3no staff would utilise the 'office' floorspace during regular working hours on a typical day-to-day basis. It follows that there would be up to a maximum of 8 staff members at the Site at any one time.

Updated Trip Generation

The submitted Transport Statement (July 2025) assessed the potential number of trips associated with the existing office use using TRICS data. This estimated it would generate 3-6 two-way vehicular trips in the peak hours and a daily total of 43 car movements for the period 0700-1900.

There is no relevant data in the TRICS database for the proposed operation and as such a first principles approach was adopted for the application.

During consideration of the application, the financial contribution was incorrectly calculated using the trip generation figures for the existing office use shown in Table 3.1 of the Transport Statement.

At the meeting on 5 December 2025, it was requested that estimated trip generation figures be provided for the proposed use. This is set out in the summary table below for the same time period as assessed for the existing office use (07:00 – 19:00).

	IN	OUT	TOTAL	NOTES
07:00 – 08:00	2	1	3	Includes 2 staff arriving for training and 1 overnight staff member departing
08:00 – 09:00	2	0	2	Includes 1 training staff member and 1 office staff member arriving
09:00 – 10:00	3	0	3	Includes 1 training staff member and 2 office staff arriving
10:00 – 16:00	10	5	15*	Includes 10 service users arriving for training. 5 services users will stay overnight with the remainder departing after training that day
16:00 – 17:00	0	5	5	Includes 3 training staff and 2 office staff departing
17:00 – 18:00	0	1	1	Includes 1 office staff member departing
18:00 – 19:00	1	1	2	Includes 1 training staff member departing and 1 overnight staff member arriving
07:00 – 19:00	18	13	31	

*Note that there would be 15 trips associated with service users on Monday and Friday but this would reduce to 10 on Tuesday – Thursday on account of overnight stays.

The table demonstrates that the proposed change of use would result in an estimated 31 daily car trips (worst case) compared to 43 daily car trips associated with the existing lawful office use.

This represents a 27% net reduction in vehicle movements and associated NOx and PM₁₀ emissions. The proposal would therefore not result in a worsening of local air quality and is considered air quality neutral in accordance with the GLA and London Borough of Hillingdon methodology.

A table which sets out the car trips across a typical week is also provided at **Appendix 1**. This demonstrates that the proposed change of use would result in an estimated 136 weekly car trips compared to 215 associated with the existing lawful office use. This represents a net reduction of 37% in car trips.

The assessment has been undertaken in line with the GLA Air Quality Neutral methodology using the existing lawful office use as the baseline. As the proposed use generates fewer trips than the established use, transport emissions fall below the applicable benchmark thresholds. There is no evidence to suggest higher trip rates than the extant office use, which remains the correct comparator.

While the site is located within an AQMA, the GLA and Hillingdon approach requires mitigation only where a proposal results in a net increase in emissions above benchmark levels. As the proposal reduces vehicle movements compared to the existing lawful use, no worsening of air quality arises and a contribution would not meet the tests of necessity or proportionality. It is noted that the LB Hillingdon Highways confirmed that the proposed trips are less than the existing trip generation when consulted on the application.

Sustainability Commitments

In addition to the reduction in vehicular trips associated with the proposed use, Vantive and its UK affiliates have published commitments aligned with PPN 06/21 and NHS sustainability objectives. This includes a Carbon Reduction Plan which targets Net Zero by 2045 and corporate initiatives linked to sustainable procurement, waste reduction and energy efficiency.

The proposed training facility at the Site will also include the following operational measures:

- EV charging facilities (2 spaces)
- Cycle parking (16 spaces).
- Encouragement of public transport and car sharing
- No significant new combustion plant is introduced (e.g. no CHP, no large gas boilers),
- Agreement within Heads of Terms with the Landlord to bring building up to EPC A rating

Conclusion

The proposed development comprises a change of use of existing office floorspace to bespoke health and training use. The lawful office use is estimated to generate up to 43 daily two-way car trips, whereas the proposed use is predicted to generate approximately 31 daily two-way car trips.

This represents a net reduction in vehicle movements and associated transport-related NOx and PM₁₀ emissions. In accordance with the Greater London Authority Air Quality Neutral methodology adopted by the London Borough of Hillingdon, the proposal would not result in a net increase in pollutant emissions and is therefore considered air quality neutral. No additional air quality mitigation measures or financial contributions are therefore necessary.

The GLA Air Quality Neutral guidance does not support precautionary offset payments where a development demonstrably does not increase emissions. Requiring a contribution in these circumstances would be inconsistent with adopted policy and established London-wide practice.



Appendix 1

CAR TRIPS FOR PROPOSED USE

Clinical Staff	M		T		W		T		F		S		S	
	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT
07.00-08.00	2	1	2	1	2	1	2	1	1	1				
08.00-09.00	1		1		1		1							
09.00-10.00	1		1		1		1		1					
10.00-16.00														
16.00-17.00		3		3		3		3		1				
17.00-18.00														
18.00-19.00	1	1	1	1	1	1	1	1	1	1				
07.00-19.00	5	5	5	5	5	5	5	5	3	3	0	0	0	0
Clinical Service Users	M		T		W		T		F		S		S	
	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT
07.00-08.00														
08.00-09.00														
09.00-10.00														
10.00-16.00	10	5	5	5	5	5	5	5	5	10				
16.00-17.00														
17.00-18.00														
18.00-19.00														
07.00-19.00	10	5	10	0	0	0	0							
Commercial Staff	M		T		W		T		F		S		S	
	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT	IN	OUT
07.00-08.00														
08.00-09.00	1		1		1		1		1					
09.00-10.00	2		2		2		2		2					
10.00-16.00														
16.00-17.00		2		2		2		2		2				
17.00-18.00		1		1		1		1		1				
18.00-19.00														
07.00-19.00	3	3	3	3	3	3	3	3	3	3	0	0	0	0
TOTAL 07.00-19.00	18	13	11	16	0	0	0	0						
TOTAL CAR TRIPS FOR WEEKLY PERIOD	136													

*The Vantive-commissioned assessment of trips associated with the current approved use were 43 car trips each working day which equates to 215 total trips for working week