

15 September 2025

Q&A Planning Limited  
c/o Peter Keenan

SLR Project No.: 415.064889.00001

LBoH application reference: 43510/APP/2024/3336

## RE: Unit 2, Ruislip Retail Park: Air Quality Assessment – Response to Air Quality Officer Consultation Comments

### Introduction

SLR Consulting Ltd (SLR) was instructed by Q&A Planning Limited to provide an Air Quality Assessment<sup>1</sup> (AQA) in support of a planning application for the change-of-use and the addition of mezzanine floorspace (the ‘Proposed Development’) at Unit 2, Ruislip Retail Park, Ruislip (the ‘Site’). The Site currently comprises a Carpetright retail store, and the Proposed Development includes change of use to a Next retail store.

The planning application was submitted to and validated by London Borough of Hillingdon (LBoH) under application reference: 43510/APP/2024/3336.

Following submission and during formal consultation of the planning application and supporting documentation, the LBoH Air Quality Officer has provided formal consultation comments<sup>2</sup> to the submitted AQA (the ‘LBoH Air Quality Officer response’).

This Technical Memorandum provides a response to the content of the LBoH Air Quality Officer response.

We note that prior to completing the AQA, pre-assessment consultation via written email communication was attempted with the LBoH Air Quality Officer to agree upon the scope and methodology of the AQA. However, prior to completion / publication of the AQA, no written response from the LBoH Air Quality Officer was received. Notwithstanding, the AQA was completed based upon the scope and methodology as originally proposed to LBoH. This is detailed within Section 1.1 of the submitted AQA.

### SLR Response to LBoH Air Quality Officer Comments

#### Air Quality Neutral Compliance

The LBoH Air Quality Officer response states “*The proposed development is not Air Quality Neutral for transport emissions*”. **This is factually incorrect.**

The requirement for development to be *Air Quality Neutral* is as stated within the London Plan 2021<sup>3</sup>, and the LBoH Local Plan<sup>4,5</sup>. LBoH Local Plan Part 2 specifically includes *Policy DMEI 14: Air Quality* which specifies development should “*be at least air quality neutral*”.

<sup>1</sup> Unit 2, Ruislip Retail Park, Air Quality Assessment, Q&A Planning Limited. SLR Consulting Limited reference: 415.054889.00001 Rev 1.0 dated 20 December 2024.

<sup>2</sup> Planning Specialist Observations to planning ref: 43510/APP/2024/3336, dated 07/08/2025.

<sup>3</sup> Greater London Authority, The London Plan. 2021.

<sup>4</sup> London Borough of Hillingdon, Local Plan: Part 1 (Strategy Policies), November 2012.

<sup>5</sup> London Borough of Hillingdon, Local Plan: Part 2 (Development Management Policies), January 2020.



LBoH Local Plan Part 2, including *Policy DME1 14: Air Quality*, is referenced within the submitted AQA and the LBoH Air Quality Officer response.

Section 7 of the submitted AQA provides the Air Quality Neutral Assessment, which was completed in accordance with the approach defined within *London Plan Guidance Air Quality Neutral*<sup>6</sup>. There is no alternative guidance approach specific to LBoH for the calculation / determination of Air Quality Neutral. The submitted AQA demonstrates compliance with the applied methodology, confirming the Proposed Development is air quality neutral for transport emissions.

Despite this, the LBoH Air Quality Officer response then incorrectly states: “*Therefore, the total emissions associated with these activities need to be mitigated. [...] The level of mitigation required associated with the operation phase of the proposed development is calculated using GLA’s Air Quality Air Quality Approach*”.

**However**, the London Plan Guidance Air Quality Neutral states:

“*If the total trip rate is less than or equal to the TEB, the development is Air Quality Neutral in terms of transport emissions. [...]*

*If development is still not able to meet the benchmarks, the next step is to seek agreement with the local planning authority to secure on- or off-site mitigation measures.*”

By disregarding the London Plan Guidance Air Quality Neutral – which the LBoH Local Plan requires – the Officer’s request for mitigation is procedurally unsound and without policy basis.

## Consideration of Air Quality Focus Area

Notwithstanding, we recognise requirements stated within LBoH’s Local Plan Part 2<sup>5</sup> and the Air Quality Action Plan<sup>7</sup> (AQAP) for development to be ‘air quality positive’<sup>8</sup> when located within an Air Quality Focus Area (AQFA). However, there is no documented evidence base contained within either the LBoH’s Local Plan Part 2 or the AQAP which provides a detailed method to the approach for offsetting emissions. We note the AQAP simply states:

“*In AQ focus areas NOx damage calculation costs are requested to form the basis of planning obligation for costs where the developer mitigation is insufficient*”

As stated within Section 4.1.1 of the submitted AQA, the Site itself is not located within an AQFA. Rather, the Site is located approximately 1.4km to the east of the ‘A40 / South Ruislip’ AQFA. As stated within Section 6.1 / Section 8.2.2 of the submitted AQA, the trip assignment for the Proposed Development indicates a portion of the operational phase distributed trips are predicted to occur on roads within the A40 / South Ruislip AQFA. Only 12.3% of operational trips are forecast to pass through the A40 / South Ruislip AQFA, equating to just an increase of 18 annual average daily traffic (AADT).

## Proportionality of Costs

The LBoH Air Quality Officer response requests for £220,162 which is disproportionate to the risk afforded by an increase of 18 AADT Proposed Development trips predicted to occur on roads within the A40 / South Ruislip AQFA. Furthermore, the calculation of the damage cost / request for Section 106 contribution to offset the road traffic emission impact

<sup>6</sup> Greater London Authority, London Plan Guidance Air Quality Neutral. February 2023.

<sup>7</sup> London Borough of Hillingdon, Air Quality Action Plan 2019 - 2024, May 2019.

<sup>8</sup> We note this requirement to be ‘air quality positive’ does not meet the wider London Plan Air Quality Positive (AQP) guidance definition.

<https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/air-quality-positive-aqp-guidance>.



additionally includes consideration of particulate matter (as PM<sub>2.5</sub>) road traffic emissions.  
**This is a departure from the requirements of the LBoH AQAP, as quoted above, and is disputed.**

Section 8.2.2 of the submitted AQA presents a Damage Cost Calculation, which has been completed following a documented guidance based approach<sup>9</sup>, and monetises impacts on air quality over a 5-year period as recommended within air quality guidance<sup>10</sup>. The calculated damage costs are based upon the Proposed Development's total trip generation (i.e. an increase of 146 AADT), and is stated to be £7,808.

The LBoH Air Quality Officer response requested £220,162 contribution is nearly 30 times greater than the robust, guidance-based calculation of £7,808 presented in the submitted AQA. This disparity is unjustifiable and unsupported by any adopted policy or methodology.

## Closure

We trust the above provides sufficient clarification to address the consultation response received from LBoH Air Quality Officer.

We further note the conclusions to the AQA, including the calculation of damage costs, are robust and defensible.

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<sup>9</sup> Defra: Air quality appraisal: damage cost guidance. March 2023.

<sup>10</sup> EPIC (previously EPUK) & IAQM, Land-Use Planning and Development Control: Planning for Air Quality, v1.2, (2017).

