

Condition 26 Low Emission Strategy Report

Proposed New Units
Berrite Estate
Industrial Estate
Iron Bridge Road
Hillingdon

Application Number:
45237/APP/2022/3398

1.0 INTRODUCTION

1.1 This report has been produced to discharge condition 26 - Low Emission Strategy report of approved planning application 45237/APP/2022/3398.

1.2 **Project Information**

Applicant: Berrite Estate Ltd.

Agent: Mr Ian Williams – AFA Architects & Planners Limited.

Application Number: 45237/APP/2022/3398

Site Address: Berrite Estate Industrial Estate, Iron Bridge Road

Proposal: Replacement of existing warehouses with 3 new warehouses.

1.3 **Condition 26 – (45237/APP/2022/3398)**

No development shall commence until a low emission strategy (LES) has been submitted to and approved in writing by the Local Planning Authority. The LES shall specify ways to reduce air pollution emissions to the maximum possible extent to conform with the LBH Local Action Plan.

The measures are to include but not be restricted to:-

- 1) *A clear and effective plan to encourage staff to:-*
 - a) *use public transport;*
 - b) *cycle / walk to work where practicable;*
 - c) *enter car share schemes;*
 - d) *purchase and drive to work zero emission vehicles.*

The plan should have a clear set of actions defined, associated with clear time frames for each action, a person responsible for its delivery and measure the results in a tangible way.

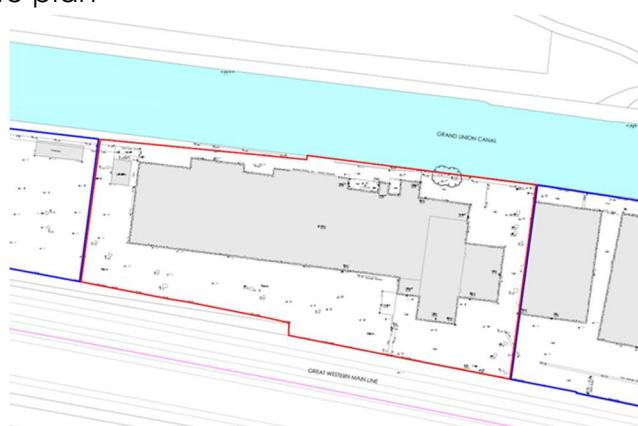
- 2) *Install EV fast charging points to promote the use of zero emission vehicles for both LGVs and HGVs.*

The measures in the agreed scheme shall be maintained throughout the life of the development.

- 1.4 The Low Emission Strategy report aims to provide a framework for the project team to operate consistently within sustainability guidelines.

- 1.5 **Site and Surroundings**

- 1.6 The site is located to the west of central London to the north of Heathrow Airport in the London Borough of Hillingdon. Approximately 1.5 km north of Junction 4 of the M4 motorway, the site is accessed via the Stockley Road, Horton Road, the Iron Bridge Road North crossing the Grand Union Canal leading to Ironbridge Road South which terminates at the main access gates to Berrite Estate Industrial Park.
- 1.7 To the direct north of the site is the Grand Union Canal which bank forms the northern boundary of the site. To the east is the site's main access via Berrite Estate running past the other industrialist units which make up Berrite Estate. To the direct south is the Great Western Main Line railway the boundary to which forms the southern boundary of the site, to the west is an open.
- 1.8 The site is predominately flat and made up of concrete hard standing and building structures.
- 1.9 The application site comprises three existing light industrial units in a series of connected buildings. A substantial part of the building is made up of Asbestos Roof & gables and a significant part of this has been damaged by fire.
- 1.10 Existing site plan



1.11 The Proposed Development

1.12 The proposed development of 3 no replacement industrial units cover a similar area as the existing buildings but has been divided up into three distinct buildings separated by yards. The existing gross external area (GIA) is approximately 1388 m².

1.13 The GIA of the proposed new units is 1,367 m² (Unit 06- 459 m², Unit 07 - 451 m², and Unit 08 - 457 m²)

1.14 The proposals will provide the following provision for parking:

- 24 - Covered secure cycle spaces
- 1 - Motorcycle space
- 19 - Total car parking spaces
- 16 Standard car parking spaces.
- 3 Car parking spaces to accessible standard.
- 14 Electric car charging space.

(With a further 2 passive bays.)

1.14 Proposed site plan



2.0 PLANNING AND REGULATORY CONTEXT

2.1 Legislation is set out at national, regional, and local level.

2.2 NATIONAL LEGISLATION

- 2.3 The Climate Change Act 2008 is the UK's primary legislation for tackling climate change, establishing legally binding targets for emissions reductions, including a net-zero target by 2050, and creating the Climate Change Committee to advise the government.
- 2.4 The Seventh Carbon Budget, a limit on the UK's greenhouse gas emissions over the five-year period 2038 to 2042, is 535 MtCO₂e, including emissions from international aviation and shipping.
- 2.5 The National Planning Policy Framework (NPPF) December 2024 sets out the Government's economic, environmental and social planning policies for England. The policies set out in this framework apply to the preparation of local and neighbourhood plans and to decisions on planning applications.

2.6 REGIONAL LEGISLATION

- 2.7 The London Plan emphasizes sustainable development through several key principles, including:
- 2.8 Minimizing Greenhouse Gas Emissions: Encouraging energy-efficient designs and renewable energy use to meet carbon reduction targets.
- 2.9 Urban Greening: Promoting green infrastructure, such as parks and green roofs, to enhance biodiversity and improve air quality

- 2.10 Flood Risk Management: Implementing sustainable drainage systems and other measures to mitigate flood risks.
- 2.11 Circular Economy: Supporting waste reduction, recycling, and resource efficiency.
- 2.12 Air Quality Improvement: Ensuring developments do not worsen air quality and meet legal standards.
- 2.13 These principles aim to balance environmental, social, and economic needs for a sustainable future.

2.14 **LOCAL LEGISLATION**

- 2.15 **London Borough of Hillingdon Local Plan Part 1: Strategic Policies (November 2012)**
- 2.16 SO8: *Protect and enhance biodiversity to support the necessary changes to adapt to climate change. Where possible, encourage the development of wildlife corridors.*
- 2.17 SO10: *Improve and protect air and water quality, reduce adverse impacts from noise including the safeguarding of quiet areas and reduce the impacts of contaminated land.*
- 2.18 SO11: *Address the impacts of climate change and minimise emissions of carbon and local air quality pollutants from new development and transport.*
- 2.19 SO12: *Reduce the reliance on the use of the car by promoting safe and sustainable forms of transport, such as improved walking and cycling routes and encouraging travel plans.*
- 2.20 *Related Policies: EM1, EM7, EM8, BE1, T1*

2.21 **London Borough of Hillingdon Local Plan Part 2: Development Management Policies (January 2020)**

2.22 Hillingdon's rich and varied natural environment is essential to the diversity of the Borough, promoting a healthy way of life for residents and helping to mitigate the effects of climate change. The Local Plan Part 1 recognises the environmental pressures that are likely to arise in the coming years and provides a framework of strategic policies to address these issues.

2.23 The more detailed policies seek to ensure that all new development coming forward in the Borough takes account of:

- Sustainable design, reducing carbon emissions and sustainable energy;
- Green Belt, Metropolitan Open Land and Green Chains;
- Bio-diversity, water management, water efficiency and flood risk;
- Air quality and contamination; and
- Minerals and aggregates.

2.24 **London Borough of Hillingdon Air Quality Action Plan 2019-2024** - sets out the action that the Council will take to improve air quality within the borough. The objectives defined are to focus actions to Improve the areas of poorer air quality and continue to improve air quality across the borough.

3.0 LOW EMISSION STRATEGY

3.1 The following section provides details of the measures to be incorporated into the scheme to ensure the potential impact of the proposals on local air quality is minimised, in accordance with the London Borough of Hillingdon Air Quality Action Plan 2019-2024.

3.2 The Environment Act 1995 requires all Local Authorities to review air quality

within their districts. If it appears that any air quality 'Objective' prescribed in the regulations and in the National Air Quality Strategy is not likely to be achieved, then the Local Authority must designate the affected area as an Air Quality Management Area (AQMA).

- 3.3 The proposed site is located within the Hillingdon AQMA which covers a large proportion of Hillingdon. From the southern boundary north to the border defined by the A40 corridor from the western borough boundary, east to the intersection with the Yeading Brook north until its intersection with the Chiltern-Marylebone railway line.
- 3.4 As reviewed in the Air Quality Assessment report produced by Air Quality Consultants (AQC), the quantum of new building is virtually the same area as that being removed. Traffic generated by the development have been assessed and agreed with Hillingdon Council and a financial agreement has been put in place as part of the planning approval.
- 3.5 The Design features of the proposed development to mitigate impact on local air quality are outlined below:-
- 3.6 The approved Planning Permission provides the following standard mitigation measures to reduce the impact of the operation of the proposed development:
 - 100% electrically powered development with roof top solar panels.
 - One fast Electric Vehicle (EV) charging space.
 - Two passive EV charging spaces (infrastructure only)
 - 12 secure covered cycle parking spaces.
- 3.7 The following additional mitigation measures, intended to offset the transport emissions, have been agreed by the developer:
 - A further 12 secure covered cycle parking spaces bring the total to 24.
 - 13 additional fast EV charging spaces, bringing the total to 14 EV charging spaces.

- Financial contribution.

3.8 The proposal has been designed to exceed the standard requirements for electrical car charging and provisions of covered cycle parking to reduce the production of pollution and greenhouse gases.

3.9 **Low and Zero Carbon Technology** - The site has been designed to be electrically powered with no onsite use of gas or other polluting power sources. This is supported by roof mounted solar panels to produce electricity.

3.10 The energy hierarchy will be used to prioritize energy solutions in order of sustainability, starting with reducing energy demand (be lean), then improving energy efficiency (be clean), and finally using renewable energy sources (be green).

3.11 Reduce Energy Demand (Be Lean) - The most sustainable approach is to minimize energy consumption in the first place. This will be achieved by using high levels of building insulation and air tightness, use of LED lighting, adopting energy-efficient technologies where possible.

3.12 Improve Energy Efficiency (Be Clean) - Once energy demand is reduced; the next step is to use energy more efficiently. This will include movement sensor-controlled lighting, and all electric heating systems.

3.13 Use Renewable Energy (Be Green) - Finally, when energy demand is low and efficiency is high, the focus shifts to using renewable energy sources. Solar has been fitted to all buildings.

3.14 **Promoting Sustainable Modes of Transport** - New tenants of the proposed units will be provided a tenant welcome pack including information on public transport, cycling and walking access to the site to encourage new site users to be aware and can take advantage of available sustainable transport.

3.15 New tenants will be encouraged to enter a car share scheme.

- 3.16 The site is in a highly sustainable location with West Drayton Station and bus stops in easy walking distance of the site as well as access to the Canal tow path network for bikes and walking.

- 3.17 **Prevention of Idling** - Signage will be employed at the entrance to the site and at unit entrances. Users of the site will be encouraged to raise awareness with delivery drivers and companies to ensure the dangers of vehicle idling are known.

- 3.18 **Provision of Green Infrastructure** - A 3 metre strip of land along the Canal edge has been set aside for green landscaping. This new landscape zone will support the existing wildlife corridor along the canal and significantly increase the biodiversity of the site.

- 3.19 The provision of new planting and green infrastructure will aid in the absorption of pollutants in the air, contributing to an improvement of local air quality.

- 3.20 The car parking area of the proposed development has been designed to give high priority to electric vehicles. This includes their location near the entrance to the new units and the provision of 14 electric vehicles charging points (well above standard levels) and the infrastructure to support a further 2 electric vehicles charging points in the future. The provision of electric vehicles charging points above standard will aid in encouraging user of the development to take up low emission and electric vehicles.

4.0 CONCLUSION

- 4.1 This Low Emission Strategy provides a synopsis of how the proposed development of the 3 new industrial units at the Berrite Estate provides sustainable development.

- 4.2 This report summaries the consideration given to National Policy, Regional Policy and the London Borough of Hillingdon Local Plan in the formulation of this strategy, aiming to minimise the impact of the proposed development on the local air quality during construction and operation, and ensure accordance with the London Borough of Hillingdon Air Quality Action Plan 2019-2024.
- 4.3 Overall, we consider the proposal constitutes sustainable development in accordance with national, regional and local policy requirements, and will provide a development that seeks to promote these principles in operation.

Appendix A – planning approved site plan.

