

## **Low Emission Strategy**

**Unit 4, Silverdale Industrial Estate, Hayes**

**Client: Mulhaven Properties LLC**

**Reference: 8167-2r2**

**Date: 23<sup>rd</sup> March 2026**



## Report Issue

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## **1.0 INTRODUCTION**

### **1.1 Background**

1.1.1 This Low Emission Strategy (LES) has been prepared by Redmore Environmental to accompany an application to discharge Condition 15 attached to full planning permission (ref. 49261/APP/2024/2904), approved by LB Hillingdon on 12<sup>th</sup> March 2026 for redevelopment of Unit 4, Silverdale Industrial Estate, Hayes. The approved description of the development is as follows:

"Demolition of the existing building and structures on site, and all other associated site clearance works. Construction of a data centre building (Class B8) with plant at roof level with an emergency generator (1 no.) and associated flue (provided within an external compound adjoining the data centre building), sprinkler tank and pumphouse, security guard house, and provision of one kiosk substation and MV Building. The development also comprises the construction of a new access and internal road and circulation areas, footpaths, provision of car and bicycle parking, hard and soft landscaping and other associated works and ancillary site infrastructure."

1.1.2 This report is commissioned on behalf of Mulhaven Properties LLC.

### **1.2 Site Location and Context**

1.2.1 The site is located at Unit 4, Silverdale Industrial Estate, Hayes, at approximate National Grid Reference (NGR): 510283, 179469. Reference should be made to Figure 1 for a map of the site and surrounding area.

1.2.2 Planning approval for the development has been granted by the LB Hillingdon (reference: 49261/APP/2024/2904) subject to a number of conditions. These include the following in relation to air quality:

"15. 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 strategy to encourage users of the development 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.

2) Install EV fast charging points to promote the use of zero emission above the London Plan requirements.

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

#### REASON

As the application site is within an Air Quality Management Area, and to reduce the impact on air quality in accordance with Policy EM8 of the Local Plan: Part 1 (November 2012), Policy DMEI 14 of the London Borough of Hillingdon Local Plan (part 2), the London Borough of Hillingdon Air Quality Action Plan 2019-2024, London Plan (2021) policy S11 and T4, and the National Planning Policy Framework (2024)."

1.2.3 A LES has therefore been produced in order to address the requirements of the above condition. This is provided in the following report.

## 2.0 STRATEGY

### 2.1 Introduction

2.1.1 There is the potential for the following emissions associated with the construction and operation of the scheme:

- Fugitive dust emissions during the construction phase; and,
- Exhaust emissions from off-site vehicles during the operational phase.

2.1.2 The magnitude of the above emissions and measures to limit releases are considered in the following Sections.

2.1.3 It is noted that the back-up generator requires an Environmental Permit to operate. This will ensure the plant is supplied in accordance with Best Available Technology (BAT). As such, mitigation is not required and this element has not been considered further. In addition, a carbon offset payment in lieu has been paid by the Applicant.

2.1.4 Heating and hot water will be provided by electric heat pumps. These do not produce emissions to atmosphere. As such, mitigation is not required and this element has not been considered further.

### 2.2 Construction Phase

2.2.1 There is the potential for fugitive dust emissions to occur as a result of construction phase activities. These were assessed in the Air Quality Assessment<sup>1</sup> undertaken by Redmore Environmental in accordance with the methodology outlined within the Mayor of London's 'The Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance'<sup>2</sup>. The results indicated the following:

- The potential risk of dust soiling was determined as **medium** from earthworks and trackout and **low** from demolition and construction; and,

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<sup>1</sup> Air Quality Assessment - Unit 4, Silverdale Industrial Estate, Hayes, Redmore Environmental, 2024.

<sup>2</sup> The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance, The Mayor of London, 2014.

- The potential risk of human health impacts was determined as **low** from earthworks and trackout and **negligible** from demolition and construction.

2.2.2 Suitable mitigation measures were identified in order to reduce potential impacts as a result of the proposed development in accordance with the Mayor of London's guidance<sup>3</sup>. These are summarised in Table 1 and will be formalised within a Construction Management and Logistics Plan as required by Condition 16 of the planning approval.

**Table 1 Fugitive Dust Emission Mitigation Measures**

Issue	Control Measure
Site management	<ul style="list-style-type: none"> <li>• Develop and implement a stakeholder communications plan that includes community engagement before work commences on site</li> <li>• Develop a Dust Management Plan (DMP)</li> <li>• Display the name and contact details of person(s) accountable for air quality pollutant emissions and dust issues on the site boundary</li> <li>• Display the head or regional office contact information</li> <li>• Record and respond to all dust and air quality pollutant emissions complaints</li> <li>• Make a complaints log available to the local authority when asked</li> <li>• 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</li> <li>• 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 are being carried out, and during prolonged dry or windy conditions</li> <li>• Record any exceptional incidents that cause dust and air quality pollutant emissions, either on- or offsite, and the action taken to resolve the situation in the log book</li> </ul>
Preparing and Maintaining the Site	<ul style="list-style-type: none"> <li>• Plan site layout so that machinery and dust causing activities are located away from receptors, as far as is possible</li> <li>• Erect solid screens or barriers around dust activities or the site boundary that are at least as high as any stockpiles on site</li> <li>• Fully enclose site or specific operations where there is a high potential for dust production and they are active for an extensive period</li> <li>• Avoid site runoff of water or mud</li> <li>• Keep site fencing and scaffolding clean using wet methods</li> <li>• Remove materials from site as soon as possible</li> <li>• Cover, seed or fence stockpiles to prevent wind whipping</li> </ul>

<sup>3</sup> The Control of Dust and Emissions During Construction and Demolition Supplementary Planning Guidance, The Mayor of London, 2014.

Issue	Control Measure
Operating vehicle/machinery and sustainable travel	<ul style="list-style-type: none"> <li>• Ensure all on-road vehicles comply with the requirements of the London Low Emission Zone</li> <li>• Ensure all non-road mobile machinery (NRMM) comply with the standards set within this guidance</li> <li>• Ensure all vehicles switch off engines when stationary - no idling vehicles</li> <li>• Avoid the use of diesel or petrol powered construction related equipment and use mains electricity or battery powered equipment where possible</li> <li>• Produce a Construction Logistics Plan to manage the sustainable delivery of goods</li> </ul>
Operations	<ul style="list-style-type: none"> <li>• Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques</li> <li>• Ensure an adequate water supply on the site for effective dust/particulate matter mitigation</li> <li>• Use enclosed chutes and conveyors and covered skips</li> <li>• Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate</li> <li>• Ensure equipment is readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable using wet cleaning methods</li> </ul>
Waste management	<ul style="list-style-type: none"> <li>• Reuse and recycle waste to reduce dust from waste materials</li> <li>• No bonfires or burning of waste materials</li> </ul>
Demolition	<ul style="list-style-type: none"> <li>• Soft strip inside buildings before demolition</li> <li>• Ensure effective water suppression is used during demolition operations</li> <li>• Avoid explosive blasting, using appropriate manual or mechanical alternatives</li> <li>• Bag and remove any biological debris or damp down such material before demolition</li> </ul>
Construction	<ul style="list-style-type: none"> <li>• Avoid scabbling (roughening of concrete surfaces) if possible</li> <li>• Ensure sand and other aggregates are stored in bunded areas and are not allowed to dry out</li> </ul>
Trackout	<ul style="list-style-type: none"> <li>• Avoid dry sweeping of large areas</li> <li>• Ensure vehicles entering and leaving site are covered to prevent escape of materials during transport</li> </ul>

## **2.3 Air Quality Neutral**

2.3.1 The London Plan<sup>4</sup> requires that all developments are 'air quality neutral' to ensure proposals do not lead to further deterioration of existing poor air quality. In order to support this policy, guidance<sup>5</sup> has been produced by the Greater London Authority (GLA). This provides a methodology for determining potential emissions from a development and benchmark values for comparison purposes. Where the benchmark is exceeded then action is required, either locally or by way of off-setting.

2.3.2 The Air Quality Assessment<sup>6</sup> undertaken by Redmore Environmental for the scheme concluded that the proposed development meets the building and transport emission benchmarks. As such, the proposals comply with the air quality neutral requirements of the London Plan.

## **2.4 Operational Phase**

2.4.1 There is the potential for vehicle exhaust emissions to occur throughout the operational phase as a result of future users travelling to and from the site. As outlined in the Air Quality Assessment<sup>7</sup>, potential impacts were predicted to be **not significant** in accordance with the Institute of Air Quality Management (IAQM) guidance<sup>8</sup>. As such, mitigation measures are not considered necessary.

2.4.2 Notwithstanding the above, a number of measures will be incorporated into the scheme. These have been incorporated within a Travel Plan<sup>9</sup> for the development and are outlined further in the following Sections.

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<sup>4</sup> The London Plan March 2021, GLA, 2021.

<sup>5</sup> London Plan Guidance: Air Quality Neutral, GLA, 2023.

<sup>6</sup> Air Quality Assessment - Unit 4, Silverdale Industrial Estate, Hayes, Redmore Environmental, 2024.

<sup>7</sup> Air Quality Assessment - Unit 4, Silverdale Industrial Estate, Hayes, Redmore Environmental, 2024.

<sup>8</sup> Land-Use Planning & Development Control: Planning for Air Quality, IAQM, 2017.

<sup>9</sup> Travel Plan Statement, SLR Consulting Limited, 2024.

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## **Public Transport**

- 2.4.3 The scheme is located within 700m of a number of bus stops within Hayes town centre. It is anticipated that site users could walk to these stops within 10-minutes. Ten services operate from the stops, arriving approximately every 11 to 20-minutes, and provide connections to key locations such as Hounslow, Brentford and Heathrow Airport.
- 2.4.4 Hayes and Harlington rail station is location within 850m of the site. It is anticipated that site users could walk to the station within 12-minutes or cycle within 5-minutes. Ten one-way services operate from the station every hour between Monday and Friday, providing connections to central London.
- 2.4.5 The above information will be summarised within a Staff Welcome Pack which will be provided to all staff prior to first occupation. A Travel Information Noticeboard will also be placed within a central area of the workplace. These resources will be updated with the latest bus and rail timetables to ensure that all staff are able to effectively plan their route to work.
- 2.4.6 It is considered that the provision of clear and up to date information regarding public transport options will encourage users of the development to take alternative modes of transport to access the site.

## **Cycling and Walking**

- 2.4.7 The site is located on Silverdale Road which provides footpaths on both sides of the road with dropped kerbs at a number of points. Local walking and cycling routes from local transport links will be outlined on maps within the Staff Welcome Pack and on the Travel Information Noticeboard.
- 2.4.8 A Travel Plan Champion will be selected within the site team. This individual will be the main point of contact for all staff who have questions regarding the Travel Plan. They will explore and organise the following options to encourage cycling and walking:
- Walking events at lunchtime and after work;
  - Walking step challenges; and,

- Implementation of a Cycle to Work Scheme. This will allow purchase of cycles or cycle equipment at a discounted rate.

2.4.9 In order to further encourage employees and visitors to use alternative transport modes, the development will provide secure cycle storage in a sheltered location. The development will also include showers and lockers for all staff.

2.4.10 It is considered that the above measures will encourage the uptake of cycling and walking as a means to access the site, thereby reducing vehicle exhaust emissions.

### **Car Share Scheme**

2.4.11 In order to encourage staff to reduce the number of single person vehicle movements at the site, the Travel Plan Champion will be responsible for communicating options for car share schemes.

2.4.12 A database listing driver details will be produced and maintained by the Travel Plan Champion. This will identify employees who are reasonably able to car share and allow for effective communication of commuting plans between staff members.

2.4.13 The Staff Welcome Pack will also include details of car share schemes, such as Lift Share. This will provide a secondary communication channel for members to advertise driving routes and offer commuting lifts to non-drivers.

### **Electric Vehicle Parking**

2.4.14 The scheme will include eight car parking spaces. Two will be installed with electric vehicle charging facilities. The remaining spaces will include passive infrastructure for future upgrades as required. Reference should be made to Appendix 1 for specific details of the Electric Vehicle infrastructure to be used on site.

2.4.15 The installation of electric vehicle charging facilities will aid in promoting the use of zero emission vehicles by staff and visitors.

### **3.0 CONCLUSION**

3.1.1 This Low Emission Strategy (LES) has been prepared by Redmore Environmental to accompany an application to discharge Condition 15 attached to full planning permission (ref. 49261/APP/2024/2904), approved by LB Hillingdon on 12<sup>th</sup> March 2026 for redevelopment of Unit 4, Silverdale Industrial Estate, Hayes.

3.1.2 In accordance with the requirements of planning condition 15, the development will provide the following mitigation:

- Measures to reduce the potential for fugitive dust emissions associated with construction phase activities;
- Provision of a Staff Welcome Pack to provide information on public transport options, cycling and walking routes and car share schemes;
- Provision of a Travel Information Noticeboard to provide up to date information on bus and train times, cycling and walking routes and car share schemes;
- Promotion of group walking activities;
- Implementation of a Cycle to Work scheme;
- Installation of Electric Vehicle Charging points; and,
- Development of a car share database.

3.1.3 The above measures will further reduce air quality impacts associated with the proposed development and are in accordance with the following policies:

- Policy EM8 of the Local Plan: Part 1 (November 2012);
- Policy DMEI 14 of the London Borough of Hillingdon Local Plan (part 2);
- The London Borough of Hillingdon Air Quality Action Plan 2019-2024;
- The London Plan (2021) policy S11 and T4; and,
- The National Planning Policy Framework.

3.1.4 Based on the above, it is considered that Condition 15 should be discharged.

## **4.0 ABBREVIATIONS**

DMP	Dust Management Plan
GLA	Greater London Authority
IAQM	Institute of Air Quality Management
LES	Low Emission Strategy
NGR	National Grid Reference
NRMM	Non-road Mobile Machinery

**Figures**

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**Legend**



Site Boundary

**Title**

Figure 1 - Site Location

**Project**

Low Emission Strategy  
Unit 4, Silverdale Industrial Estate,  
Hayes

**Project Reference**

8167-2

**Client**

Mulhaven Properties LLC

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**Appendix 1 - Electric Vehicle Charging Specification**

## Emily Pears-Ryding

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**From:** Divanshu Garg [REDACTED]  
**Sent:** 01 August 2025 08:50  
**To:** Emily Pears-Ryding  
**Cc:** [REDACTED]  
**Subject:** [REDACTED]

Hi Emily,

Good Morning

Please find below the technical details regarding the Electric Vehicle (EV) charging infrastructure for this project:

### 1. Type of EV Charger Installed:

We are installing one dual-outlet EV charger, which provides two charging connections from a single unit. This allows two vehicles to be charged simultaneously.

### 2. Electrical Supply Details:

- Incoming Supply: 63A, 3-phase, 415V
- Total Available Power: Approximately 44 kW
- This supply is shared between the two charging connections, either split dynamically or evenly depending on the charger configuration.

### 3. Charging Speeds:

- Each outlet can typically deliver up to 22 kW (AC, 3-phase), assuming both vehicles are charging and the unit splits the load evenly.
- Charging time per vehicle will depend on the vehicle's onboard charger but generally ranges from 2–4 hours for a typical EV to reach ~80% charge at 22 kW.

Let me know if you have any questions.

Thanks

Divanshu Garg CEng | MEng | PMP

Senior Project Engineer (Electrical)



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