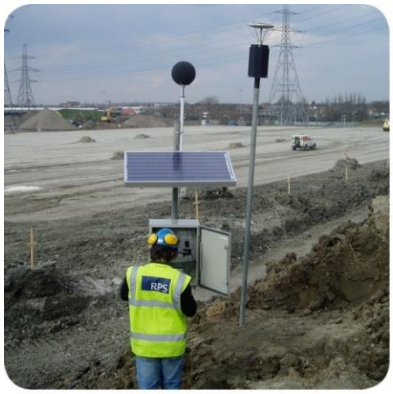
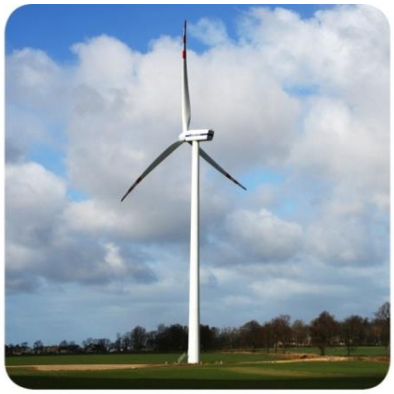
Low Emissions Strategy

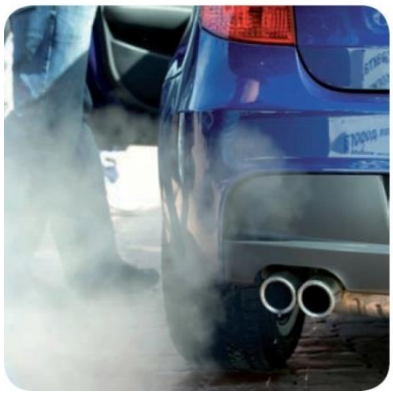
Lidl Store

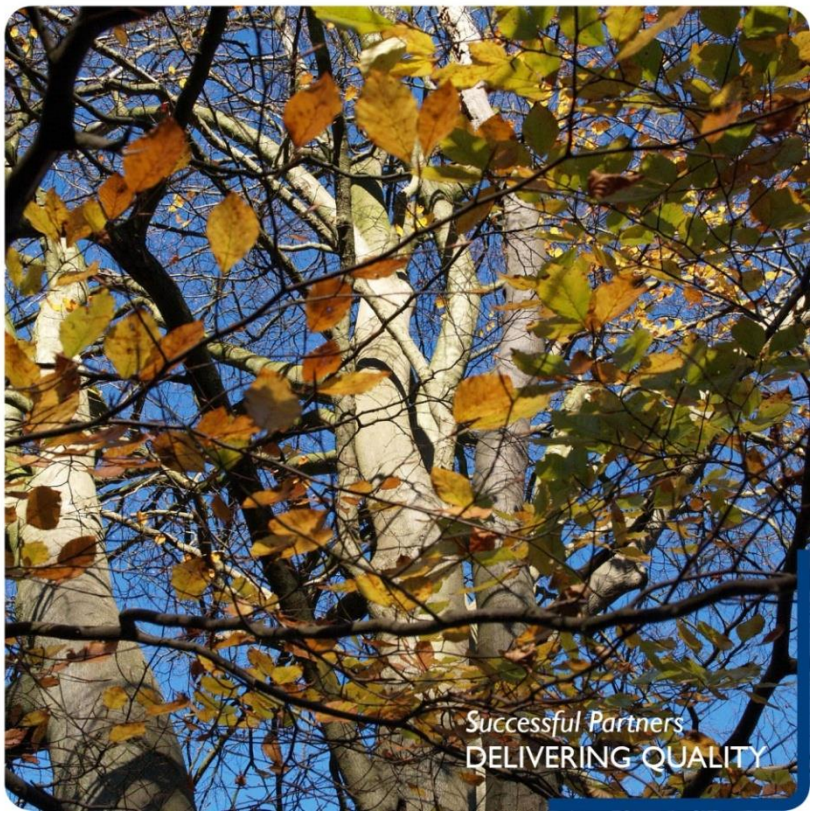
Victoria Road, South Ruislip, Middlesex

For Lidl UK









Quality Management

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Date of issue:	13 January 2017		**Revision number:**	0
Project number	JAP9455			
Document file path:	O:\Jobs_9001-9900\9455p\Deliverables\9455p_LES 20110113.docx			

Revision History				
Rev	**Date**	**Status**	**Reason for revision**	**Additional comments**
0	13/01/17	Draft	-	-

Contents

1 Introduction

1.1 The London Borough of Hillingdon (LBH) granted planning permission for the Lidl store at Victoria Road in South Ruislip, subject to various planning conditions, one of which required a Low Emission Strategy (LES):

"Low Emission Strategy - Prior to the occupation of the site, a Low Emissions Strategy for the operation of the site shall be submitted to and approved in writing by the Local Planning Authority. This shall address the use of low NOx energy sources and the active promotion of cleaner vehicle technology in regards to the fleet associated with the operation of the site."

1.2 This Low Emission Strategy has been produced in order to fulfil this obligation. It begins by setting out the controls and measures that will be implemented during the construction and demolition phase are then set out. The change in emissions has been evaluated. Measures that will reduce or replace emissions during the operational phase have been identified. The National Planning Policy Framework [1] (NPPF) paragraph 206 states that *"Planning conditions should only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects."* Consistent with the NPPF, the additional measures identified in this Low Emission Strategy are reasonable in relation to the scale of the impact associated with the operation of the Lidl store.

2 Mitigation and Control Measures During Construction

Approach to Identification of Measures

2.1 The Mayor of London's Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance [2] (hereafter referred to as the Construction and Demolition SPG) provides information relating to the approach to the assessment, recommended mitigation measures and appropriate monitoring strategies. In particular, the Construction and Demolition SPG states that the assessment methodology provided in the current version of the Institute of Air Quality Management (IAQM) *Guidance on the assessment of dust from demolition and construction* (hereafter referred to as the IAQM dust guidance) should be used.

2.2 Consistent with the recommendations in the IAQM dust guidance, a risk-based assessment was undertaken for the development, using the well-established source-pathway-receptor approach. The dust impact risk was predicted to be 'medium' before the implementation of dust controls and mitigation.

2.3 The Construction and Demolition SPG lists mitigation measures for low, medium and high dust risks. The mitigation and control measures that will be implemented during the construction phase of this development have been drawn from the 'highly recommended' measures for medium risk sites listed in the Construction and Demolition SPG. The specific mitigation and control measures that will be implemented are listed below:

Site Management

2.4 Develop and implement a stakeholder communications plan that includes community engagement before work commences on site.

2.5 Develop a Dust Management Plan.

2.6 Display the name and contact details of person(s) accountable for air quality pollutant emissions and dust issues on the site boundary.

2.7 Display the head or regional office contact information.

2.8 Record and respond to all dust and air quality pollutant emissions complaints.

2.9 Make a complaints log available to the local authority when asked.

2.10 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.

2.11 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 and dust (sic) are being carried out, and during prolonged dry or windy conditions.

2.12 Record any exceptional incidents that cause dust and air quality pollutant emissions, either on or off the site, and the action taken to resolve the situation is recorded in the log book.

Preparing and maintaining the site

2.13 Plan site layout: machinery and dust causing activities should be located away from receptors.

2.14 Erect solid screens or barriers around dust activities or the site boundary that are, at least, as high as any stockpiles on site.

2.15 Fully enclosure site or specific operations where there is a high potential for dust production and the site is active for an extensive period.

2.16 Avoid site runoff of water or mud.

2.17 Keep site fencing, barriers and scaffolding clean using wet methods.

2.18 Remove materials from site as soon as possible.

2.19 Cover, seed or fence stockpiles to prevent wind whipping.

2.20 Agree monitoring locations with the Local Authority.

Operating vehicle/machinery and sustainable travel

2.21 Ensure all on-road vehicles comply with the requirements of the London Low Emission Zone.

2.22 Ensure all non-road mobile machinery (NRMM) comply with the standards set within this guidance.

2.23 Ensure all vehicles switch off engines when stationary – no idling vehicles.

2.24 Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where possible.

2.25 Produce a Construction Logistics Plan to manage the sustainable delivery of goods and materials.

2.26 Implement a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing).

Operations

2.27 Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques such as water sprays or local extraction, e.g. suitable local exhaust ventilation systems.

2.28 Ensure an adequate water supply on the site for effective dust/particulate matter mitigation (using recycled water where possible).

2.29 Use enclosed chutes, conveyors and covered skips.

2.30 Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment and use fine water sprays on such equipment wherever appropriate.

2.31 Ensure equipment is readily available on site to clean any dry spillages, and clean up spillages as soon as reasonably practicable after the event using wet cleaning methods.

Waste management

2.32 Reuse and recycle waste to reduce dust from waste materials.

2.33 Avoid bonfires and burning of waste materials.

Medium risk measures specific to demolition

2.34 Ensure effective water suppression is used during demolition operations.

2.35 Avoid explosive blasting, using appropriate manual or mechanical alternatives.

2.36 Bag and remove ant biological debris or damp down such material before demolition.

Medium risk measures to construction

2.37 Ensure sand and other aggregates are stores in bunded areas and are not allowed to dry out, unless this is required for a particular process, in which case ensure that appropriate additional control measures are in place.

Medium risk measures specific to trackout

2.38 Regularly use a water-assisted dust sweeper on the access and local roads, as necessary, to remove any material tracked out of the site.

2.39 Avoid dry sweeping of large areas.

2.40 Ensure vehicles entering and leaving sites are securely covered to prevent escape of materials during transport.

2.41 Record all inspections of haul routes and any subsequent action in a site log book.

2.42 Install hard surfaced haul routes, which are regularly damped down with fixed or mobile sprinkler systems and regularly cleaned.

2.43 Inspect haul routes for integrity and instigate necessary repairs to the surface as soon as reasonably practicable.

2.44 Implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable).

2.45 Ensure there is an adequate area of hard surfaced road between the wheel wash facility and the site exit, wherever site size and layout permits.

2.46 Access gates to be located at least 10m from receptors where possible.

3 Mitigation and Control Measures During Operation

Air Quality Assessment Accompanying the Planning Application

3.1 The air quality assessment accompanying the planning application [3] presented the results of detailed atmospheric dispersion modelling. The air quality assessment considered the impacts of the development on ambient air quality at the point of exposure (i.e. at sensitive receptor locations) by comparing predicted levels with Air Quality Strategy objectives and EU Limit Values. The source of emissions associated with the Lidl store is transport; no energy centres are included in the scheme.

3.2 The operational impact of the Lidl Store development on existing receptors in the local area was predicted to be 'negligible' at all selected sensitive receptors taking into account the changes in pollutant concentrations and absolute levels. Using the criteria adopted for this assessment together with professional judgement, the overall impact on the area as a whole was described as 'negligible' and the resulting air quality effect was considered to be "not significant" overall. On the basis of the above, no mitigation was proposed in the air quality assessment report.

Better By Design

3.3 This section sets out the air quality mitigation and control measures incorporated into the design of the scheme.

3.4 The Applicant has prepared a Draft Travel Plan [4] that is aimed at "*promoting sustainable travel choices to reduce reliance on the private car*". The Draft Travel Plan considers the accessibility of the site in terms of reducing the need for travel using a private car.

3.5 The Draft Travel Plan identifies initiatives that provide employees and customers with a variety of travel choices so that the need to travel by private car is reduced. These will contribute to a reduction in air quality impacts. A Travel Plan Coordinator (TPC) will be appointed prior to the opening of the foodstore. The TPC will be responsible for overseeing the management, development, implementation, monitoring and review of the Travel Plan. The proposed Aim Targets for the store are:

- Achieve a 10% decrease in single occupancy vehicle trips; and
- Achieve an increase in use of alternative modes to offset reduction in SOV use. Modes to include:
    - Walking
    - Cycling
    - Car share
    - Public transport

3.6 The targets will change over time as the results of on-going usage monitoring become available.

3.7 Other measures which will contribute to a reduction in air quality impacts include:

- The provision of high quality cycle parking facilities at convenient and visible locations within the site;
- Lidl will seek to replace their vehicle fleet with upgraded vehicles with lower emissions where appropriate and practicable; and
- A Service Management Plan to ensure the successful and efficient operation of servicing/delivery activity at the Lidl store, and reduce the impact of servicing movements on the road network.

3.8 As stated above, the source of emissions associated with the Lidl store is transport; no energy centres are currently included in the scheme. However, Lidl is committed to meeting the nitrogen oxide (NO_X) emissions limits set out in the Greater London Authority Sustainable Design and Construction Supplementary Planning Guidance (SPG) should appliances be installed at a later date.

4 Conclusions

4.1 The air quality assessment accompanying the planning application concluded that the overall air quality impact from the Lidl store on the surrounding area was ‘negligible’ and the resulting air quality effect was “not significant” overall. On that basis, no mitigation was proposed in the air quality assessment report. Nevertheless, a number of air quality mitigation measures have been incorporated in to the design of the scheme.

4.2 Consistent with the NPPF, the air quality mitigation and control measures identified in this Low Emission Strategy are reasonable in relation to the scale of the impact associated with the operation of the Lidl store.

Glossary

AQMA	Air Quality Management Area
AQS	Air Quality Strategy
Deposited Dust	Dust that has settled out onto a surface after having been suspended in air.
DMP	Dust Management Plan
Dust	Solid particles suspended in air or settled out onto a surface after having been suspended in air
Effect	The consequences of an impact, experienced by a receptor
EPUK	Environmental Protection UK
HGV	Heavy Goods Vehicle
IAQM	Institute of Air Quality Management
Impact	The change in atmospheric pollutant concentration and/or dust deposition. A scheme can have an 'impact' on atmospheric pollutant concentration but no effect, for instance if there are no receptors to experience the impact.
LGV	Light Goods Vehicle
NPPG	National Planning Practice Guidance
Receptor	A person, their land or property and ecologically sensitive sites that may be affected by air quality.
Risk	The likelihood of an adverse event occurring
Trackout	The transport of dust and dirt from the construction/demolition site onto the public road network, where it may be deposited and then re-suspended by vehicle using the network

References

1 Communities and Local Government, March 2012, National Planning Policy Framework

2 Mayor of London, July 2014, The Control of Dust and Emissions During Construction and Demolition

3 RPS, November 2015, Air Quality Assessment: Lidl Food Store, South Ruislip

4 Gateway, November 2015, Draft Travel Plan, Proposed Lidl Foodstore, Imperial House, Victoria Road, South Ruislip

RPS

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