

RESPONSE TO AIR QUALITY COMMENTS FROM LONDON BOROUGH OF HILLINGDON

784-B042436

3rd November 2023

Tetra Tech have received communications from the Air Quality Officer on behalf of London Borough of Hillingdon regarding the updated air quality assessment and damage costs assessment following the publication of an updated Traffic Scenario produced by Rapport Consultants. The assessment has been undertaken to support a planning application for refurbishment of existing retail unit for use within Class E(a) including the sale of non-food and food and drink products, installation of new shopfront, reconfiguration of car park, landscaping, external plant and associated works at 217 High Street, Yiewsley, West Drayton, UB7 7GN.

Tetra Tech's responses to the note dated 26th October 2023, including 2 comments and a further note regarding the damage costs assessment, are presented below in **blue**.

Comment 1

"A No development shall commence until a Plan has been submitted to, and approved in writing by, the LPA. This must demonstrate compliance (drawn up accordance with) the GLA Control of Dust and Emissions from Construction and Demolition SPG (or any successor document). Reason: Compliance with London Plan Policy SI 1 and in accordance with Mayor of London "The Non-Road Mobile Machinery (standard condition recommended by Mayor of London, London Local Air Quality Management Policy Guidance 2019]"

Tetra Tech Response 1

A dust assessment has been undertaken within Section 5.3 of the updated AQA report and corresponding appropriate mitigation is outlined in Section 9.1 including reference to NRMM.

Comment 2

"B All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up-to-date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>." Reason: Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements of the London Environment Strategy"

Tetra Tech Response 2

This has been outlined within the construction mitigation measures in Section 9.1 within the updated AQA.

Tetra Tech Response 3 – Response to LBoH Note on Damage Cost Assessment

The Note written on 26th October 2023 by Michael Briginshaw outlines the need to undertake further actions to reduce total emissions produced by its operation for developments that are not Air Quality Positive. The document presents a Damage Costs methodology where the undiscounted level of mitigation required for the proposed development for traffic emissions is £579,162. Once all deductions were applied, the remaining value of mitigation due is £492,287. Flat rate deductions applied are as follow: Travel Plan (10%), Green Sustainable Measures (5%), contribution to long term LBH strategic long-term strategies (e.g. multimodal shift) (0%), totalling a reduction of £86,874.

The Damage Costs assessment provided by London Borough of Hillingdon appears to have been calculated over a 30-year period, however, there is no justification given for this length of time. For the majority of LPAs who request Damage Cost assessments through Supplementary Planning Documents / Guidance, a five-year assessment is required. As such, a 30-year assessment period is considered to be unreasonable and excessive. The guidance document '*Land-Use Planning & Development Control: Planning For Air Quality*' published by Environmental Protection UK and the Institute of Air Quality Management, outlines a requirement for assessment of a five-year period where a Damage Cost Assessment is required. There is no guidance, policy or documentation that can be found through the LBoH website which outlines the required approach to a Damage Cost Assessment, other than brief note that one is required when developing inside an Air Quality Focus Area.

We have completed an updated Damage Costs Assessment in Section 8.0 of the updated Air Quality Assessment. The calculation utilises the most recent Defra Emissions Factor Toolkit (version 11.0 (November 2021)) to estimate the additional pollutant emissions from a proposed development and the latest Defra Air Quality Damage Costs (published January 2019) for the specific pollutant of interest, to calculate the resultant damage cost.

The Emissions Assessment Calculator has been used in accordance with the methodology described with '*Land-Use Planning & Development Control: Planning For Air Quality*' Guidance from Environmental Protection UK and the Institute of Air Quality Management for the consideration of air quality within the land-use planning and development control processes. (January 2017).

Our five-year assessment concludes the total damage cost to be £111,019.

Table 1. Annual Emissions Factor Outputs (g/tonnes/year)

Pollutant	Year				
	2023	2024	2025	2026	2027
NO _x	0.60	0.53	0.48	0.44	0.41
PM _{2.5}	0.09	0.09	0.08	0.08	0.08

Table 2. Central Damage Costs (£)

Pollutant	Year				
	2023	2024	2025	2026	2027
NO _x	£18,851	£16,615	£14,700	£13,319	£12,096
PM _{2.5}	£11,710	£11,329	£10,937	£10,661	£10,393

Total Costs

Total NO_x = £75,581

Total PM_{2.5} = £55,030

Cost Reductions

Travel Plan (10%) = £13,061

Green Measures (5%) = £6,531

Total Damage Costs = £111,019

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