Title	Air Quality Statement for 11-17 Victoria Road, Ruislip, HA4 9AA
Report Reference	3678
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Checked by	Ana Gomes

Revision	Date	Description
01	10/07/2025	First issue for customer comment

1 Introduction

On the 20th June 2025, Hillington Borough Council refused the outline planning application for the redevelopment of 11-17 Victoria Road, Ruislip, HA4 9AA. Aether has been commissioned to prepare an air quality statement to support the appeal of the fifth reason for refusal related to air quality matters of Application Ref: 72104/APP/2025/1096.

The schedule of reasons states the reason for refusal: *"5. The proposed development is located within the LBH Air Quality Management Area, and within the Ruislip Town Centre Focus Area. No appropriate mitigation was offered by the applicant and therefore the proposed development is contrary to local and regional policies, Policy DMEI 14: Air Quality, London Borough of Hillingdon Air Quality Action Plan and the London Plan, Policy SI1".* This reason has been further developed in the delegated decision report detailed in Appendix A.

The site lies in the London Borough of Hillingdon (LBH), which has declared a large Air Quality Management Area (AQMA) for exceedances of the annual mean nitrogen dioxide (NO_2) objective. The AQMA is bounded to the north by the Chiltern-Marylebone railway line. The Proposed Development site is not located within the AQMA.

This statement describes the existing air quality within the study area; assesses the impact of the operation of the development on air quality in the surrounding area; considers the suitability of the site for the Proposed Development; and assesses operational phase emissions to determine whether the Proposed Development is air quality neutral. Potential sources of emissions have been identified and assessed in the context of existing air quality and the nature and location of receptors.

2 Site Description

2.1 Site Location and Designations

The site, 11-17 Victoria Road lies on the east side of Victoria Road, north of Ruislip Manor London Underground Station. It comprises a parade of 4 single storey retail units. The existing commercial units are located at the crossroads junction with Windmill Hill, Pembroke Road and Park Way, which are located north of the site.

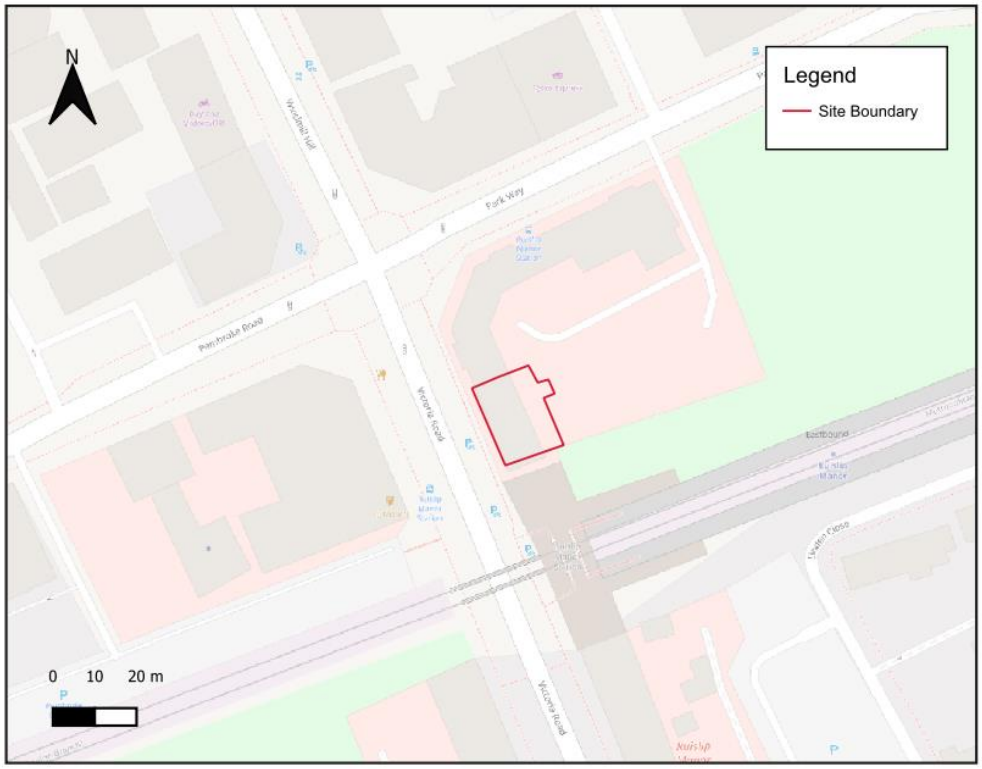
Victoria Road is a main road through the area, as shown in **Figure 1**, and the primary access to the site. A service entrance is located at the rear yard, providing access via Park Way.

The Hillingdon AQMA is bounded to the north by the Chiltern-Marylebone railway line. The Proposed Development site is not located within the AQMA. As shown in **Figure 2**, the site is approximately 1.9 km outside of the AQMA.

LBH has supplemented the Air Quality Focus Areas (AQFAs) originally defined by the Greater London Authority (GLA) by extending the Ruislip Town Centre AQFA. While the site is not located within the AQFA defined by the GLA, it does fall within the extended AQFA as defined by LBH.

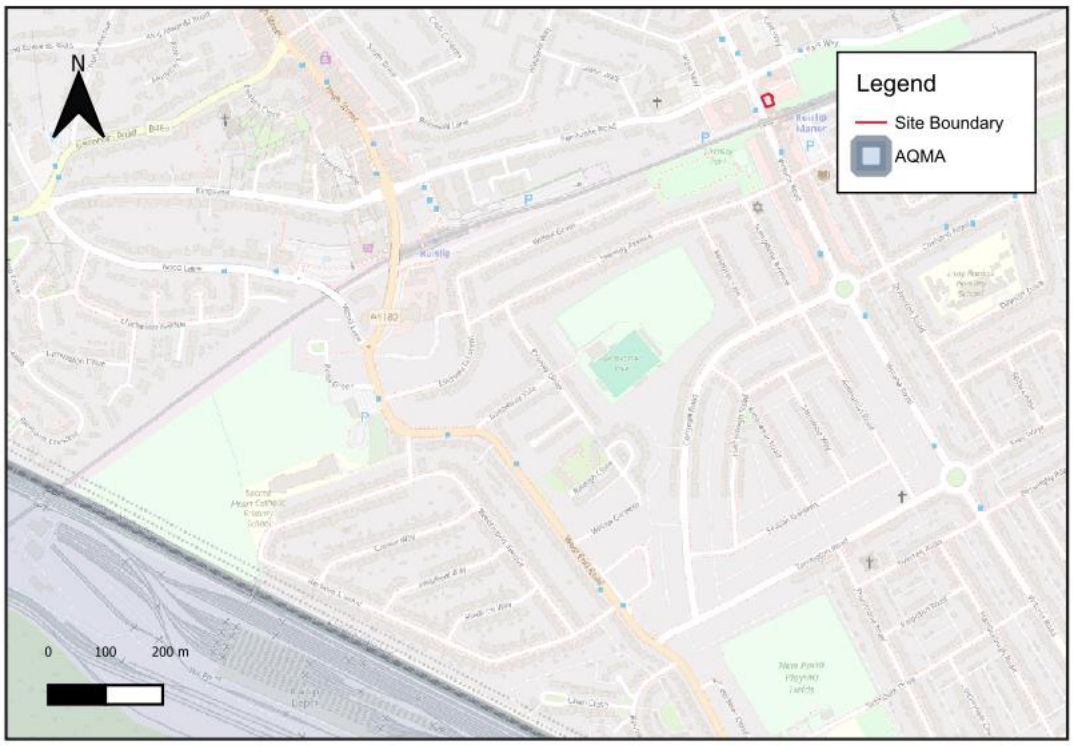
As outlined in the Draft LBH Air Quality Action Plan 2025-2030[1], the Ruislip Town Centre AQFA has been designated due to high levels of NO_2 and $PM_{2.5}$. These levels are forecast to remain above World Health Organisation (WHO) levels in 2030.

Figure 1. Location and indicative site boundary of the Proposed Development, 7-11 Victoria Road



[1] https://modgov.hillingdon.gov.uk/documents/s63525/Draft+Air+Quality+Action+Plan+-+Pre+Consultation+Version.pdf

Figure 2. Location of AQMA in relation to the Proposed Development site, 7-11 Victoria Road



3 Methodology

3.1 Assessment Criteria

The main air pollutants of concern related to construction are dust and particulate matter with an aerodynamic diameter of less than 10 µm (PM_{10}), and for road traffic are nitrogen dioxide (NO_2), PM_{10} and particulate matter with an aerodynamic diameter of less than 2.5 µm ($PM_{2.5}$).

A summary of the air quality objectives (AQOs) relevant to the proposed development, as set out in the UK Air Quality Strategy[2] and Air Quality Standards Regulations 2010 (as amended by the Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020[3]), is presented in Table 1.

Table 1: UK Air Quality Objectives for NO_2 and PM_{10} and target for $PM_{2.5}$

Pollutant	Concentration	Measured as
NO_2	40 µg/m^3	Annual mean
	200 µg/m^3	Hourly mean not to be exceeded more than 18 times per year (99.8th percentile)
PM_{10}	40 µg/m^3	Annual mean
	50 µg/m^3	24 hour mean not to be exceeded more than 35 times a year (90.4th percentile)
$PM_{2.5}$	20 µg/m^3	Annual mean

[2]Department of the Environment, Transport and the Regions in Partnership with the Welsh Office, Scottish Office and Department of the Environment for Northern Ireland, 2007. The Air Quality Strategy for England, Scotland, Wales, Northern Ireland. HMSO, London.

[3] Statutory Instrument 2020, No. 000, The Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020.

In January 2023, a legally binding $PM_{2.5}$ Annual Mean Concentration Target (AMCT) was prescribed in the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023[4] and also published in the Environmental Improvement Plan[5]. The $PM_{2.5}$ AMCT to be achieved by the end of 2040 are:

- Annual average of 10 µg/m^3 not to be exceeded at any monitoring station. With an interim target of 12 µg/m^3 to be achieved by the end of January 2028.
- Population exposure at least 35% less than in 2018. With an interim target of 22% reduction to be achieved by the end of January 2028.

The Mayor of London has also adopted a more ambitious target to meet World Health Organization (WHO) guidelines of 10 µg/m^3 for $PM_{2.5}$ by 2030[6].

Analysis of long-term monitoring data[7] suggests that if the annual mean NO_2 concentration is less than 60 µg/m^3 then the one-hour mean NO_2 objective is unlikely to be exceeded where road transport is the main source of pollution; this concentration has been used in this assessment to screen whether the one-hour mean objective is likely to be achieved. Similar to NO_2, a PM_{10} annual mean below 32 µg/m^3 is used to screen whether the 24-hour PM_{10} mean objective is likely to be achieved.

Guidance on where the AQOs should and should not apply is provided within LAQM.TG (22)[8]. The AQOs for the protection of human health are applicable outside of buildings (or other natural or man-made structures above or below ground) and where members of the public are regularly present. AQOs do not apply in workplace locations, to internal air or where people are unlikely to be regularly exposed (i.e., centre of roadways).

The annual mean objectives will apply at locations where members of the public might be regularly exposed such as building façades of residential properties, schools and hospitals and will not apply at the building façades of offices or other places of work, where members of the public do not have regular access. Since the intended use for the site is for commercial, business and residential, all the objectives will apply at the Proposed Development site.

3.2 Local Planning Policy

3.2.1 Adopted Local Plan

The Hillingdon Local Plan Part 2: Development Management Policies, 2020[9], sets out detailed policies of how the Council will seek to ensure all new development takes account of air quality and contamination.

Policy DMEI 14 Air Quality states new development proposals should, as a minimum:

> *"i) be at least "air quality neutral";*
>
> *ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new, and;*

[4] Statutory Instrument 2023, No. 96, The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023.
[5] Defra, 2023. Environmental Improvement Plan 2023. Available from: https://www.gov.uk/government/publications/environmental-improvement-plan/environmental-improvement-plan-2023-executive-summary
[6] Greater London Authority, 2018. London Environment Strategy. London.
[7] Defra, 2022. Local Air Quality Management Technical Guidance (England) 2022 (TG22). HMSO.
[8] Defra, 2022. Local Air Quality Management Technical Guidance (England) 2022 (TG22). HMSO. https://laqm.defra.gov.uk/air-quality/featured/uk-regions-exc-london-technical-guidance/
[9] The London Borough of Hillingdon, 2020. Local Plan Part 2: Development Management Policies 2020. January 2020.

iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area."

To deliver this, LBH advises:

6.63 "Stringent mitigation measures will need to be outlined before consideration is given to a new development along major roads and around Heathrow Airport, due to the consistently high level of atmospheric pollutants. Especially where any development proposal either introduces new residents into areas of poor air quality or would lead to deterioration in air quality for existing residents;

6.64 The main focus of improvement will be on those areas where air quality objectives are currently exceeded. However, it is important to make certain that work continues to ensure that the recommended levels are, at the very minimum, maintained and, preferably showing continued improvement for all the residents in the Borough;

6.65 Planning applications for all relevant development should contain an assessment of the likely future levels of air quality in the area and take account of the provisions of the Mayor of London's Sustainable Design and Construction SPD."

3.2.2 New Local Plan

As outlined in the Local Development Scheme[10], February 2025, Regulation 18 consultation concluded in June 2024. The Regulation 18 consultation Draft Local Plan is currently being prepared for submission in October 2025. As such, there are no new policies to review regarding air quality.

3.2.3 Hillingdon Local Planning Validation Checklist

The Hillingdon Local Planning Validation Checklist for February 2024[11] outlines as a local requirement that for every planning application an:

"Air Quality Assessment should be submitted in areas where air quality is already poor and could have an adverse impact on the proposed development"

The assessment should confirm whether:

"*Air quality is an issue and demonstrate what mitigation measures will be implemented to ensure the inhabitants of the proposed development are not negatively affected by the existing poor air quality".*

3.2.4 London Borough of Hillingdon Air Quality Action Plan, 2019-2024

The LBH Air Quality Action Plan 2019-2024[12] sets out measures that will be undertaken to improve air quality in the borough. The objectives defined for Hillingdon's AQAP are to focus actions to:

"A. improve the areas of poorer air quality as soon as possible

B. continue to improve air quality across the borough and reduce public exposure to air pollution, especially for vulnerable groups within our communities such as the young, the old and those especially already suffering with associated respiratory illnesses".

LBH requires developments to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially with impacts in areas where the air quality is already poor, namely Focus Areas.

[10] https://www.hillingdon.gov.uk/media/15950/Local-Development-Scheme-2025/pdf/q3Local_Development_Scheme_2025.pdf?m=1741272791747

[11] https://www.hillingdon.gov.uk/media/5135/Validation-checklist-June-2020/pdf/PUBLICATION_Validation_Checklist_June_2020.pdf?m=1613489637773

[12] The London Borough of Hillingdon, 2019. Air Quality Action Plan 2019-2024.

The air quality positive concept was introduced by the London Plan 2021[13] and the air quality positive[14] guidance detailing the approach was published in 2023. The guidance states that air quality positive approach applies to large-scale developments proposals subject to an Environmental Impact Assessment (EIA). Therefore, this aspect is not considered required to support the planning application.

3.2.5 London Borough of Hillingdon Draft Air Quality Action Plan, 2025-2030

LBH's Draft Air Quality Action Plan, 2025-2030[15] sets out measures that will be undertaken to improve air quality in the borough. The priorities defined for Hillingdon's AQAP are:

> *Theme 1: Monitoring and Reporting. Track pollution trends and compliance with air quality objectives, manage appropriately via the use of online tools to share air quality information;*
>
> *Theme 2: Improving the Urban Environment. Manage air quality through the planning system, pursue net improvements in focus areas. Produce specific Focus Area Action plans and develop approaches to cleaner greener urban spaces.*
>
> *Theme 3: Cleaner Transport. Reduce use of polluting vehicles by promoting sustainable modes of transport and active travel. Develop projects to reduce traffic impacts on air quality within Focus Areas of the borough e.g. alignment between AQAP and Cycling Strategy.*
>
> *Theme 4: Protecting the vulnerable. Design a project to deliver sessions to GPs and Health Centre facilities with a view to train them as air quality champions so that they can advise patients regarding pollution exposure reduction strategies.*
>
> *Theme 5: Education and Awareness. Extend access to information on the importance of reducing pollutant emissions and personal exposure to air pollution, with particular focus on the most vulnerable groups.*

4 Baseline Assessment

This section provides an overview of the local air quality data available. The baseline air quality within in the vicinity of the site was established based on a review of relevant monitoring data. Data was obtained from the following sources:

- Air quality monitoring conducted by the LBH
- London Atmospheric Emissions Inventory (LAEI)[16]

4.1 Local Pollutant Sources and Concentrations

Local authorities are required to periodically review and assess the current and future quality of air in their areas. Where it is determined that an air quality objective is not likely to be met, the authority must designate an AQMA and produce an Air Quality Action Plan (AQAP).

4.1.1 Nitrogen Dioxide

LBH operates both automatic and passive diffusion tube monitoring of air quality at a number of locations within its jurisdiction.

[13] Greater London Authority, 2021. The London Plan. March 2021. London.
[14] Greater London Authority, 2023. London Plan Guidance Air Quality Positive. February 2023
[15] https://modgov.hillingdon.gov.uk/documents/s63525/Draft+Air+Quality+Action+Plan+-+Pre+Consultation+Version.pdf
[16] https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2019

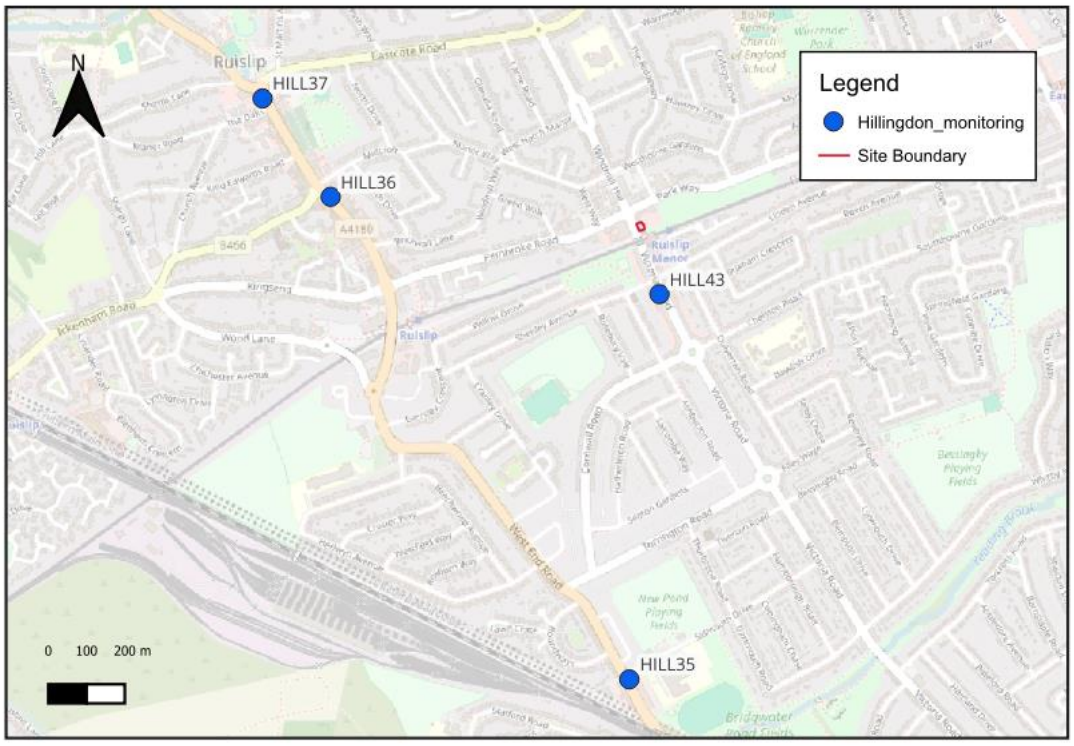
A summary of the closest and most representative diffusion tube monitoring locations are shown in **Figure 3** and described in **Table 2**. The automatic site, HI 1 is located approximately 2.9 km from the site.

Table 2: Measured Annual Mean NO_2 concentrations in proximity to the site

Site Name	Site Type	NO_2 Annual Mean (µg/m^3)				
		2018	2019	2020	2021	2022
Automatic station						
HI 1 – South Ruislip	R	36	34	16	27	28
Diffusion Tubes						
HILL 35 Grey Lamp-post, West End Road, to the south of Sidmouth Drive, outside Aroma House Chinese. HA4 6LR	R	-	36.9	28.9	28.0	27.2
HILL 36 Lamp-post outside Vodafone, 69 High Street Ruislip. HA4 8JB	R	-	38.5	28.1	31.6	32.7
HILL 37 2/6 High St. Ruislip Lamp-post with Parking and church sign. HA4 7AW	R	-	39.9	28.1	30.4	31.7
HILL 43 Lamp-post outside tattoo and Five star nail parlours, No 60, Victoria Road. HA4 0AH	R	-	39.4	29.1	28.2	28.6
AQO		**40**				

Note: R = Roadside. UB = urban background. Exceedances of annual average AQO highlighted in bold.

Figure 3. LBH monitoring locations within the vicinity of the site



The measured NO_2 concentrations at the roadside sites in the proximity of the site have been below the relevant AQOs between 2018 and 2022.

As expected, concentrations were lower in 2020 and 2021, when compared with 2019, due to the impact of the Covid 19 pandemic, and remained at lower levels in 2022.

Measured annual mean NO_2 concentrations at diffusion tubes between 2018 and 2022 were below 60 µg/m^3, which indicates that the hourly mean objective was unlikely to have been exceeded at the diffusion tube monitoring sites.

4.1.2 Particulates (PM_{10} and $PM_{2.5}$)

Measured PM_{10} and $PM_{2.5}$ concentrations are presented in **Table 3**.

Table 3: Measured PM_{10} and $PM_{2.5}$ concentrations in proximity to the site

Site Name	Site Type	Concentrations (µg/m^3)				
		2018	2019	2020	2021	2022
PM_{10}						
HI 1 – South Ruislip	R	17	17	18	17	19
AQO		**40**				
PM_{10} 24-Hour Means > 50						
HI 1 – South Ruislip	R	1	3	1	0	4
AQO		not to be exceeded more than 35 times a year				

Note: R = roadside. Where the period of valid data is less than 85% of a full year, the 90.4th percentile is provided in brackets.

The measured PM_{10} concentrations at the HI 1 automatic roadside site have been significantly below the relevant AQOs and target between 2018 and 2022. Whilst HI 1 is the closest automatic site to the Proposed Development, it is over 3.8km, and therefore may not be fully representative of site conditions.

There are no automatic sites in proximity of the site which monitor $PM_{2.5}$ annual mean concentrations. However, the automatic sites in LBH that do measure $PM_{2.5,}$ show a decreasing trend between 2021 and 2022.

4.1.3 London Atmospheric Emissions Inventory

The LAEI estimates key pollutants (NO_x, PM_{10}, $PM_{2.5}$ and CO_2) by source type for the base year 2019 and forecast years 2025 and 2030. These emissions were estimated at ground level using an atmospheric dispersion model.

Predicted air quality concentrations at the site have been extracted from the latest available LAEI for NO_2, PM_{10} and $PM_{2.5}$ and are shown in **Figure 4** to **Figure 7**. The LAEI concentrations maps are likely to represent a worst case scenario.

Figure 4. LAEI NO_2 predicted concentrations for 2025 (µg/m^3)

Ground level NO_2 concentrations predicted by the LAEI indicate concentrations at the site are well below 30 µg/m^3, i.e. below the AQO. As predicted concentrations do not exceed 60 µg/m^3 the hourly mean objective is unlikely to be exceeded at the development site.

Figure 5. LAEI PM_{10} predicted concentrations for 2025 (µg/m^3)

Ground level PM_{10} concentrations predicted by the LAEI indicate concentrations at the site are below 20 µg/m^3 and that the AQO is not exceeded at the development site.

Figure 6. LAEI $PM_{2.5}$ predicted concentrations for 2025 (µg/m^3)

Ground level $PM_{2.5}$ concentrations predicted by the LAEI indicate concentrations at the site are below 10 µg/m^3 and that the AQO will not be exceeded at the development site.

4.2 Assessment of Baseline Data

Measured concentrations at roadside monitoring sites located at similar distance to main road links as the site, in proximity to the development, indicate that the AQOs are not expected to be exceeded at the site. Furthermore, the roadside locations shown in Figure 3 and detailed in Table 2 are located next to a main road (A4180 West End Road) with higher traffic flows than the road link next to the site (Victoria Road) and therefore concentrations at the site would be expected to be lower than concentrations measured along West End Road and to be well below the AQOs. Predicted concentrations for 2025 (LAEI) also indicate that the AQOs are not expected to be exceeded at the site.

As concentrations fall-off rapidly on moving away from an emissions source, such as a main road, some variation in NO_2, PM_{10} and $PM_{2.5}$ concentrations across the site is expected. Concentrations at the site are likely to be highest next to Victoria Road, at the proposed development facade, reducing gradually as distance from the road link increases.

Pollutant concentrations at background and roadside locations are predicted to decrease in future years due to the gradual renewal of the road transport fleet with less polluting models and implementation of national policies, such as the intention to ban new combustion engine private vehicle sales by 2035[17, 18]. It is therefore expected that concentrations at the site currently meet and will remain below the AQOs.

[17] https://www.gov.uk/government/news/pathway-for-zero-emission-vehicle-transition-by-2035-becomes-law

[18] Air Quality Consultants, 2020. Nitrogen Oxides Trends in the UK 2013 to 2019. January 2020. Available at: https://www.aqconsultants.co.uk/resources. Air Quality Consultants (AQC) published a study looking at trends in nitrogen oxides in the UK between 2013 to 2019. The study concluded that there is an overall reduction trend in NOx concentrations that have continued through 2019 'with NOx concentrations at roadside sites have reduced by an average of 5.14% per year since 2013'.

5 Operational Phase Assessment

5.1 Operational phase

It is understood that no gas boilers are present at the site. The energy strategy for the site will rely on renewable energy technologies, such as photovoltaic (PV) panels or air source heat pumps (ASHPs). Sufficient space has been allocated on the flat roof for the integration of PV panels. No emergency backup generator is proposed.

The energy strategy will assist in reducing the Proposed Development's operational carbon emissions, supporting compliance with the 2021 Building Regulations uplift and the London Plan's carbon reduction targets. The Proposed Development's energy strategy is based on non-combustion sources and would not results in significant buildings emissions.

The Proposed Development is a car-free scheme in accordance with the London Plan. As such, there will be no parking at the site and no parking is being considered for future site uses. The proposed development traffic emissions impacts and associated effects on local air quality are considered to be negligible and not significant.

The baseline assessment indicates that the relevant AQOs applicable to the Proposed Development (see section 3.1 for more details) are likely to be met and the development site is considered suitable for the proposed use without the need for specific air quality mitigation.

Nonetheless, in order to minimise the exposure of new occupants to poor air quality, it is recommended that air intakes are ideally located on non-road facing façades or if roadside in elevated positions (such as higher floor levels and/or roof top), to avoid emissions from road traffic.

5.2 Air Quality Neutral and Air Quality Positive

Policy SI1 of the London Plan 2021 requires development proposals to be at least air quality neutral and follow an air quality positive approach.

LBH requires development proposals located in Focus Areas (or that impact on Focus Areas) to be air quality positive and in accordance with measure 5 of the LBH Air Quality Local Action Plan 2019-2024, mitigate total emissions in these sensitive areas. However, the Air Quality Positive guidance[19] approach only applies to large developments that are subject to an Environmental Impact Assessment (EIA) and therefore does not apply to the Proposed Development.

The air quality neutral guidance[20] sets out the exceptions and benchmarks that developments must meet to be considered air quality neutral. The Proposed Development's energy strategy will be based on non-combustion sources. The Proposed Development does not include any substantial combustion processes and therefore **meets the building emission benchmark.**

The air quality neutral guidance states that "*where major developments meet the definition of 'car-free', they can be assumed to meet the TEB*". Car free definition may include provision for disable person parking and delivery and servicing vehicle trips are not covered by air quality neutral. The

[19] Greater London Authority, 2023. London Plan Guidance Air Quality Positive. February 2023
[20] Greater London Authority, 2023. London Plan Guidance Air Quality Neutral. February 2023.

proposed development is considered car free and therefore **is assumed to meet the transport emission benchmark**.

5.3 Mitigation Measures

The air quality objectives are expected to be met at the proposed site, and no significant effects from operational traffic on local air quality are expected. Air quality mitigation measures to protect future site users from poor air quality and to reduce the impacts of the development on local air quality are therefore not required.

As detailed in the Design and Access Statement[21], there are some features and additional measures which have been incorporated as part of the site design, which will help mitigate total emissions. These include:

- The site has a PTAL rating of 4, indicating good public transport accessibility. This feature will reduce car-dependency, having a positive effect for emissions.
- The proposal exceeds the minimum requirement for cycle parking standards as defined in the Hillingdon Local Plan Part 2. The site will provide 16 on-site cycle parking spaces for residents, which is double the minimum requirement.
- The site will adopt a "Be Lean, Be Clean, Be Green" approach to energy. Passive design measures such as high levels of insulation and airtight construction will help reduce energy demand.
- A green/sedum roof has also been incorporated to enhance local air and water quality and encourage biodiversity benefits.

6 Summary

Overall, it is concluded there are no air quality constraints to the Proposed Development at 11-17 Victoria Road, Ruislip, HA4 9AA. This air quality statement responds to the appeal of the fifth reason for refusal related to air quality matters of Application Ref: 72104/APP/2025/1096 and the delegated decision report (Appendix A). This statement provides evidence the Proposed Development complies with regional and local planning policies.

Measured concentrations at automatic and non-automatic monitoring sites in proximity to the development site, show concentrations have been below the air quality objectives in the most recent years. This combined with the LAEI's estimated pollutant concentrations indicates no notable exceedances of the relevant objectives at the Proposed Development site for the years assessed. The site is therefore considered suitable for the Proposed Development without the need for specific mitigation measures.

The Proposed Development is a car-free scheme and no onsite combustion energy generation plant is planned. The Proposed Development therefore would not generate any substantial road traffic or building emissions. Any impacts and associated effects on local air quality are therefore considered to be not significant. The Proposed Development is also considered air quality neutral for transport and building emissions.

[21] https://planning.hillingdon.gov.uk/OcellaWeb/viewDocument?file=dv_pl_files%5C72104_APP_2025_1096%5CDesign+and+Access+Statement.pdf&module=pl

Additional mitigation measures have been implemented at the site. The use of renewable energy technologies such as PV and ASHP, “Be Lean, Be Clean, Be Green” approach to energy demand and the provision of cycle parking spaces, which exceed minimum planning requirements, will contribute to enhance local air quality. This demonstrates the site seeks to minimise any potential emissions and adopt an air quality positive approach. As such, the Proposed Development is in accordance with Policy DMEI 14: Air Quality, London Borough of Hillingdon Air Quality Action Plan and the London Plan, Policy SI1.

Appendix A - Delegated Decision – Air Quality reason and response

Delegated Decision report Item No. Report of the Head of Development Management and Building Control

Address: 11-17 VICTORIA ROAD RUISLIP MANOR

Development: Erection of ground floor rear extension and three storey extension above existing commercial parade to provide 7 residential units (Class C3) (2 x 1-bed, 2 person units, 4 x 2-bed, 3 person units and 1 x 3-bed, 5 person unit)

LBH Ref Nos: 72104/APP/2025/1096

AIR QUALITY: Policy SI 1 of the London Plan (2021) Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (2020) states that proposals should demonstrate appropriate reductions in emissions. It adds that, development proposals should, as a minimum:

i) be at least "air quality neutral";
ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.

Aether: section 5 on Operational phase assessment demonstrates that the development is:

I. "air quality neutral" for both transport and building emissions (section 5.2)
II. There is no unacceptable risk from air pollution to sensitive receptors, both existing and new, as concentrations rat the development site are expected to be below the air quality objectives (section 4.2) and the proposed development will not result in significant road or building emissions (section 5.1)
III. The proposed development is not located within the AQMA (section 2.1 and Figure 1).

The proposed development is located within the LBH Air Quality Management Area, and within the Ruislip Town Centre Focus Area. As per the London Plan, developments need to be neutral as minimum and LBH requires development proposals located in Focus Areas (or that impact on Focus Areas) to be air quality positive and in accordance with measure 5 of the LBH Air Quality Local Action Plan 2019-2024, mitigate total emissions in these sensitive areas.

Aether: The proposed development is not located within the AQMA and, while the site is not located within the AQFA defined by the GLA, it does fall within the extended AQFA as defined by LBH (section 2.1). The proposed development will not result in significant road or building emissions (section 5.1) and therefore mitigation is not deemed required. Nonetheless, several mitigation measures are being proposed to further reduce the impact of the development on local air quality (section 5.3)

LBH requires developments to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially with impacts in areas where the air quality is already poor (LBH Air Quality Local Action Plan 2019-2024), namely Focus Areas. Furthermore, policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), requires active contribution towards the continued improvement of air quality, especially within the Air Quality Management Area.

Aether: As per above, the proposed development will not result in significant road or building emissions (section 5.1) and therefore mitigation is not deemed required. Nonetheless, several

mitigation measures are being proposed to further reduce the impact of the development on local air quality (section 5.3)

According to LBH Local Action Plan, proposed development within Focus Areas (or with impacts on FAs) require more stringent air quality neutral procedures and needs to be Air Quality positive, with a total emission mitigation approach. No appropriate mitigation has been proposed by the applicant and therefore the proposed development is contrary to local and regional policies, Policy DMEI 14: Air Quality , London Borough of Hillingdon Air Quality Action Plan and the London Plan, Policy SI1.

Aether: the Air Quality Positive guidance approach only applies to large developments that are subject to an Environmental Impact Assessment (EIA) and therefore does not apply to the Proposed Development (section 3.2.4 and 5.2). As per above, the proposed development will not result in significant road or building emissions (section 5.1) and therefore mitigation is not deemed required. Nonetheless, several mitigation measures are being proposed to further reduce the impact of the development on local air quality (section 5.3)

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