

Jonathan Best
Montagu Evans LLP
5 Bolton Street
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Date: 30th July 2020
Reference: 2194-1c1

Dear Jonathan,

BAKERS ROAD, UXBRIDGE - AIR QUALITY

Redmore Environmental Ltd was commissioned by HSBC Bank Pension Trust (UK) Ltd to provide a Low Emissions Strategy, inclusive of an Air Quality Neutral Assessment, for a hotel development at 25 - 30 Bakers Road, Uxbridge, UB8 1RG. Following submission of the report (reference: 2194-1r3), a consultation response dated 24th July 2020 was received from London Borough of Hillingdon (LBoH). This removed the previous objection to the scheme on air quality grounds (reference: 72722/APP/2019/347) and recommended two planning conditions and a Section 106 contribution of £122,856 be agreed to off-set air quality impacts associated with the development.

We consider the two proposed planning conditions to be reasonable and would recommend these are accepted.

The Section 106 value is higher than the £54,371 detailed in the Low Emissions Strategy produced by Redmore Environmental. There are two main reasons for the difference:

- LBoH used a 10-year appraisal period for the calculation, rather than the 5-year period adopted by Redmore Environmental; and,
- LBoH included an additional pollutant, particulate matter with an aerodynamic diameter of less than 2.5µm (PM_{2.5}) in the calculation.

A 5-year appraisal period is generally adopted for Low Emissions Strategy calculations in support of development proposals. This was recommended by the Low Emission Strategies Partnership

based on work previously undertaken in conjunction with the Department for Environment, Food and Rural Affairs (DEFRA). LBoH indicate a 10-year appraisal period is more appropriate as London Transport Policies and Plans usually span over a period of 10 to 15 years and this is the time over which improvements can be seen (and or are tangible) and/or evaluated as beneficial. We would suggest that the construction and operation of a hotel is not comparable to local or regional transport policies and it is unlikely that any action taken by the applicant would result in quantifiable improvements in air quality over any period due to the minimal effect traffic generated by the development is likely to have on existing pollutant concentrations within Uxbridge. As such, the justification is considered to be flawed. We would also note that the Air Quality Neutral requirements of the London Plan assess 1-year of emissions and therefore strict application of this guidance would result in a much lower Section 106 value that that calculated by Redmore Environmental and currently being offered by the applicant.

Although it is accepted that LBoH, along with all UK Local Authorities, are required to reduce PM_{2.5} concentrations, the reasoning provided for the Section 106 request is due to the presence of the Uxbridge Air Quality Focus Area (AQFA), which has been designated for nitrogen dioxide (NO₂) only. As such, given the presence of the AQFA is the policy justification provided for the Section 106 contribution, it is unreasonable to include an unconnected pollutant within the calculation. As outlined previously, strict application of the Air Quality Neutral guidance, even with PM_{2.5} emissions included, would result in a much lower Section 106 value that that currently being offered by the applicant.

As outlined in the Low Emissions Strategy, the proposed improvements to Cock's Yard alley are anticipated to reduce development related traffic and also encourage a shift in existing vehicle users towards walking. These works have been costed at £177,197 by LBoH and will be delivered as part of the development. If this amount was deducted from the Section 106 contribution, as has been the case on other schemes within Hillingdon where measures to increase use of non-motorised transport were included, then the residual value would be £0 for both the original calculation and the LBoH version.

Notwithstanding the above, we would note that the methodology followed by LBoH is not national planning guidance and has not been adopted into a local Supplementary Planning Document or similar. As such, it is unclear whether the Section 106 contribution is justified in planning policy terms.

We trust the above summarises the issues and outlines our position. However, please do not hesitate to contact me at your convenience should you require anything further.

Yours sincerely,

FOR AND ON BEHALF OF REDMORE ENVIRONMENTAL LTD



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Director