



Planning Specialist Observations			
Specialism(s)	Air Quality		
Officer	Dimitra Angelopoulou		
Site	ORBITAL INDUSTRIAL ESTATE HORTON ROAD YIEWSLEY UB7 8JL		
Proposal	Demolition of existing buildings and structures and redevelopment of the site to provide modern employment units (for flexible use across classes E(g)(iii), B2, B8 with ancillary office space) alongside car parking, service yards, landscaping, ancillary structures and all other associated works.		
Planning Ref	79689/APP/2025/2438	Date	05/08/2026

Objection	Condition	Informative	No Comments	Discharge of Condition
	X			

1 Summary of Comments

The proposed development is located within the LBH Air Quality Management Area and in the catchment area of West Drayton/Yiewsley Focus Area (350m), bringing additional traffic emissions which will contribute to detriment of local air quality.

As per the London Plan, developments need to be air quality neutral **as minimum** and LBH requires development proposals located in Focus Areas (or that are likely to affect such sensitive areas) to apply a **more stringent air quality neutral approach** and be air quality positive (LBH Air Quality Local Action Plan 2019-2024), contributing to the reduction of emissions in these sensitive areas.

According to LBH Local Action Plan, proposed development with impacts 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.

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 if there are any impacts foreseen within the Air Quality Management Area.



According to LBH, proposed development within Focus Areas (or with impacts on FAs) needs to be Air Quality neutral and positive and further action is required to reduce total emissions produced by its operation.

Therefore, the total emissions associated with these activities need to be mitigated.

DAMAGE COST AND MITIGATION MEASURES

Mitigation measures to reduce emissions can be applied on-site or off-site. Where this is not practical or desirable, pollutant off-setting will be applied. The level of mitigation required associated with the operation phase of the proposed development is calculated using GLA's Air Quality neutral Approach.

The mitigation measures proposed were evaluated in terms of likely emission reductions onto local air quality. Wherever quantifiable, these are calculated and subtracted from the overall value due. When no quantification is possible, a flat rate discount is applied. Table 1 and 2 summarise the aspects of air quality and planning requirements for the proposed development.

Table 1 – Air Quality Neutral

Development	Units/area	Trip generation	AQ Neutral	Within FA/catchment area of FA?	Air Quality Positive?
Flexible use across classes E(g)(iii), B2, B8 with ancillary office space	3151 m ²	44,165 trips per annum	no	yes	no
Requirements		Mitigation of total NOx /PM _{2.5}	none	yes	S106 required £248,074

Table 2 – Level of Mitigation required, and reductions applied

Reductions Applied	Total	
	%	Damage Cost
Total Level of Mitigation Required	-	£248,074
Travel Plan	10	£24,807
Green Measures	0	
LBH Strategic Long-term projects	0	
Total reduction	10	£24,807
Total Damage Cost/S106 due	90	£223,266

The level of mitigation required from the proposed development for traffic emissions is £248,074. Once all deductions were applied, the remaining value of mitigation due is £223,266. Flat rate deductions applied are as follow: Travel Plan (10%), Green



Sustainable Measures (0%), contribution to long term LBH strategic long-term strategies (e.g. multimodal shift) (0%), totalling a reduction of £24,807.

Therefore, a section 106 agreement with the LAP of **£223,266** is to be paid for Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels, in association with the residential part of the development.

Mitigation of traffic emissions associated with construction have not been accounted for.

2 Reason for Refusal (if objecting)

N/A

3 Observations

Air Quality conditions are required to manage operation and construction emissions as required by the Mayor of London. See text below.

IMPORTANT NOTICE

1st January 2025 sees stricter requirements on emissions from mobile machinery in London, requiring EURO IV standards to be complied with. Please refer the applicant to the site below for compliance

<https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/pollution-and-air-quality/nrmm>

Conditions - Reducing Emissions from Demolition and Construction

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)

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

Context

The proposed development affects an identified Air Quality Focus Area. Air Quality Focus Areas are defined by the GLA as areas already suffering from poor air quality where prioritisation of improvements is required. This is supported by:

Local Plan Part 2 Policy DME1 14

A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.

B) 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 continued improvement of air quality, especially within the Air Quality Management Area.

Name

Title



The simplified formula is $\{(E + J + O + T) \times 40.568079205\}$

Full formula

*Total = $\{(E + J + O + T) \times [(1+0.02)^{30} - 1]\} / 0.02$

Calculation of Benchmark emissions							
Land Use	Benchmark trip rate	Average distance per trip	Emissions (g/veh/km)		Total Emissions (Kg)		
			NOx	PM2.5	NOx	PM2.5	
B8	20481.5	10.8	0.35	0.028	77.4	6.2	
TOTAL BENCHMARK EMISSIONS					77.4	6.2	
Calculation of Development emissions							
Land Use	Proposed trip rate	Average distance per trip	Emissions (g/veh/km)		Total Emissions (Kg)		
			NOx	PM2.5	NOx	PM2.5	
B8	44,165	10.8	0.35	0.028	166.9	13.4	
TOTAL DEVELOPMENT EMISSIONS					166.9	13.4	
Calculation of Excess emissions and offsetting payment							
			Benchmarks	Total Emissions (tonnes per annum)	Excess Emissions	Damage cost £ per tonne	Annual offsetting amount (£)
Transport NOx emissions			0.077	0.167	0.090	£40,048	£3,585.24
Transport PM2.5 emissions			0.006	0.013	0.007	£353,225	£2,529.76
TOTAL OFFSETTING			£248,074		as per the London Plan Air Quality 2023 guidance		
Travel Plan - 10% discount			£24,807				
Green Measures - 5% discount			£0				
Contribution to Long Term Strategic LBH Projects - 15% discount			£0				
<i>Total Discount</i>			<i>£24,807</i>				
\$106 Due			£223,266				