



Planning Specialist Observations			
Specialism(s)	Air Quality		
Officer	Dimitra Angelopoulou		
Site	THE BARN HOTEL WEST END ROAD RUISLIP		
Proposal	Partial demolition of 1no. Grade II Listed Building and conversion of Listed Buildings to provide 3no. dwellings. Demolition and redevelopment of the remainder of the site (hotel - C1 Use Class) for residential use (Class C3) with associated access, infrastructure and landscaping. (AMENDED PLANS and DESCRIPTION OF DEVELOPMENT CHANGE 24/04/26) DETAILED DESCRIPTION The partial demolition of 1no. Grade II Listed Building and conversion of the Listed Buildings to accommodate 3 no. dwellings and the replacement of the existing hotel buildings (C1 Use Class) with new building blocks and dwellings that would range between two and four storeys in height to accommodate 68 residential units (a total of 71 residential dwellings within the development) together with associated landscaping, provision of a new access off Garden Close, car parking (including disabled parking bays), cycle parking, refuse stores and servicing arrangements (Planning Application linked to LBC Reference 7969/APP/2024/2452). (AMENDED PLANS and DESCRIPTION OF DEVELOPMENT CHANGE 24/04/26)		
Planning Ref	7969/APP/2024/2451	Date	10/06/2025

Objection	Condition	Informative	No Comments	Discharge of Condition
	X			

1 Context and Summary of Comments

The proposed development is located outside 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.

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.

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.

The proposed development is within the Ruislip Town Centre Focus Area and therefore further appropriate mitigation is required.

2 Reason for Refusal (if objecting)

N/A.

3 DAMAGE COST AND MITIGATION MEASURES required in case of approval

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 Defra's Damage Cost Toolkit in this instance.

Any mitigation measures proposed will be 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 Table 2 summarise the aspects of air quality and planning requirements for the proposed development.

Table 1 – Air Quality Neutral and Air Quality Positive

Development	Units/area	Trip generation	AQ Neutral	Within FA/catchment area of FA?	Air Quality Positive?
new building blocks and maisonettes that would range between two and four storeys in height to accommodate 69 residential units (a total of 72 residential dwellings within the development)	71 units	105	No	Yes	No
Requirements		Mitigation of total NOx /PM _{2.5}			S106 required £69,006 without discounts



Table 2 – Level of Mitigation required, and reductions applied.

Reductions Applied	Total Damage Cost	
	%	
Level of Mitigation Required for traffic emissions undiscounted	-	£69,006
Travel Plan	10	
Green Measures	0	
Contribution to LBH Strategic Long-term projects/modal shift initiatives	0	
Total reduction for traffic	10	£6,901
Final Level of Mitigation Required for traffic emissions	-	£62,106
Final Level of Mitigation Required for building emissions	-	£0
Total Damage Cost/S106 due		£62,106

The undiscounted level of mitigation required to the proposed development for traffic emissions is £69,006. Deductions were applied in line with the proposed mitigation. 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, contribution to local services) (0%), totalling a reduction of £6,901.

Therefore, a section 106 agreement with the LAP of **£62,106** 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.

4 Conditions

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

e. Unless it complies with the standards set out in the GLA site, 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/>." Please note that from January 2025 the emission limits will be tightened and need to be complied with.

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 is within an Air Quality Management Area and will affect identified Air Quality Focus Areas. 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) x 40.568079205)						
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
C3 Residential	31737	10.8	0.35	0.028	120.0	9.6
TOTAL BENCHMARK EMISSIONS					120.0	9.6
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
C3 Residential	38,325	10.8	0.35	0.028	144.9	11.6
TOTAL DEVELOPMENT EMISSIONS					144.9	11.6
Calculation of Excess emissions and offsetting payment						
	Benchmarks	Total Emissions	Excess Emissions	Damage cost	Annual ofsetting amount	
		(tonnes per annum)		£ per tonne	(£)	
Transport NOx emissions	0.120	0.145	0.025	£40,048	£997.30	
Transport PM2.5 emissions	0.010	0.012	0.002	£353,225	£703.70	
TOTAL OFFSETTING		£69,006	as per the London Plan Air Quality 2023 guidance			
Travel Plan - 10% discount	£6,901					
Green Measures - 5% discount	£0					
Contribution to Long Term Strategic LBH Projects - 15% discount	£0					
Total Discount	£6,901					
S106 Due	£62,106					