

PLANNING STATEMENT

In support of the discharge of planning conditions
6 (DLP/CLP and DMP/CMP) and 8 (Low Emissions
Strategy)

Application Permission Reference:
924/APP/2022/3603

Denville Hall, Ducks Hill Road,
Northwood, HA6 2SB

HCH PROJECTS

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1. INTRODUCTION

1.1. This Planning Statement has been prepared on behalf of Denville Hall Development Limited in support of an application to the London Borough of Hillingdon for the approval of details pursuant to Conditions 6 and 8 of planning permission ref. 924/APP/2022/3603.

1.2. Planning permission was granted on 24 November 2023 for:

“Demolition of no. 48 and no. 60 Ducks Hill Road, garage and wooden storage unit and the erection of three new buildings comprising 12 assisted-living units (Class C2), proposed ancillary communal space, including café and restaurant, external connecting link building, landscaping and external works.”

1.3. Conditions 6 and 8 are both pre-commencement conditions. They respectively require:

- appropriate demolition and construction logistics and environmental management arrangements; and
- a Low Emission Strategy incorporating measures relating to air quality, electric vehicle charging and sustainable travel.

1.4. The purpose of this Statement is to explain how the submitted technical documents respond to the requirements and objectives of the two conditions and to demonstrate that sufficient information has been provided to enable their discharge.

2. PLANNING BACKGROUND

2.1. The approved development provides 12 assisted-living units within two new residential buildings, together with ancillary communal accommodation and associated landscape and external works.

2.2. The development forms part of the wider Denville Hall site, an established assisted-living facility located on Ducks Hill Road.

- 2.3. The approved scheme is subject to a number of planning conditions intended to ensure that the development is implemented in an environmentally responsible manner and without unacceptable effects upon the local highway network, surrounding residential amenity or local air quality. The present application concerns Conditions 6 and 8 only.

3. CONDITION 6 – DEMOLITION AND CONSTRUCTION MANAGEMENT

Requirement of the Condition

- 3.1. Condition 6 requires, prior to commencement including demolition, the submission and approval of a:

- Demolition and Construction Logistics Plan;
- Demolition and Construction Management Plan.

- 3.2. The purpose of these documents is to minimise effects upon the local highway network and to control noise, vibration, dust and air pollutants generated by the construction process.

- 3.3. The condition identifies a detailed range of matters to be addressed, including the works programme, construction hours, traffic management, sustainable transport for workers, haulage routes, site access, public route management, site layout, loading and storage, cranes and tall plant, mud and pollution control, dust assessment, noise and vibration, NRMM, asbestos and complaints procedures.

- 3.4. The condition does not say that these two documents can be submitted as a combined document, which is how the enclosed documentation is presented.

Submitted Information

- 3.5. The principal document submitted in response to Condition 6 is the:

Demolition and Construction Environmental Management Plan

Create Consulting Engineers Ltd

Document Ref. SFH/VL/P25-3695/05

Final Issue: August 2026

- 3.6. The DCEMP incorporates and coordinates a range of supporting technical information addressing demolition, construction logistics, traffic, environmental protection, dust, noise, contamination and site management.
- 3.7. The document establishes a framework within which demolition and subsequent construction activities will be undertaken and monitored and identifies responsibilities for implementing the environmental and logistical controls contained within it.

Programme and Hours of Working

- 3.8. The DCEMP identifies a phased demolition programme comprising site mobilisation, establishment of the contractor compound and temporary parking, demolition within three defined work zones, removal of temporary parking and post-demolition works.
- 3.9. The current programme anticipates:
- enabling works commencing in November 2026;
 - temporary car park works commencing later in November 2026;
 - demolition commencing in December 2026;
 - removal of the temporary car park and commencement of post-demolition fencing works in March 2027.
- 3.10. Working hours are controlled as follows:
- Monday to Friday: 08:00–18:00;
 - no Saturday working;
 - no works on Sundays or Bank Holidays.
- 3.11. Construction deliveries are restricted to 08:00–15:00 Monday to Friday, with no weekend or Bank Holiday deliveries.
- 3.12. Exceptional activities outside the normal hours are subject to management control and notification to affected residents and businesses, with changes to working hours requiring prior agreement with the Council.

3.13. The submitted information provides a clear and enforceable framework for the timing and programming of works.

Construction Traffic and Highway Management

3.14. Construction traffic will access the site from Ducks Hill Road.

3.15. The proposed routing directs the majority of construction traffic south towards Ruislip and restricts HGV turning movements considered inappropriate to the highway context. The approved route is to be communicated to contractors, subcontractors and suppliers.

3.16. Contractor parking will be provided within the site. Importantly, off-site contractor parking is expressly prohibited, thereby avoiding construction-related parking pressure on Ducks Hill Road or surrounding residential streets.

3.17. The development also incorporates:

- managed construction access;
- banksman/traffic marshal control;
- wheel-washing facilities;
- routine inspection of the adjoining highway;
- road sweeping where necessary;
- construction traffic routing controls; and
- segregation between construction vehicles and pedestrians.

3.18. Vehicles over 3.5 tonnes are subject to additional safety requirements including FORS Silver accreditation, cycle-awareness training, sideguards where applicable, warning systems, rear-facing CCTV or equivalent measures and Class VI mirrors

3.19. These measures provide a comprehensive approach to protecting highway safety and minimising disruption to surrounding road users.

Site Access and Management

- 3.20. Construction access is to be controlled through a managed site entrance. A gateman/banksman will be available to manage construction traffic, and a segregated pedestrian route will be provided through the demolition period.
- 3.21. The contractor compound is located within Work Zone 1 and provides the principal area for site staff, welfare and associated construction activity.
- 3.22. Site establishment and construction planning identify, amongst other matters:
- site hoarding;
 - NRMM locations;
 - internal haul routes;
 - materials areas;
 - fuel storage;
 - wheel washing;
 - water supply; and
 - site drainage.
- 3.23. The arrangements establish clear spatial control over site operations and ensure that activities capable of generating amenity or environmental effects are appropriately managed.

Mud, Run-off and Pollution Prevention

- 3.24. The development incorporates wheel-washing facilities for vehicles before they leave the relevant work zones. Vehicles will be checked for cleanliness before leaving the site, loads will be sheeted as appropriate and an on-site road sweeper will be deployed where mud or debris is identified.
- 3.25. Fuel and oil will be stored within bunded facilities to prevent accidental spillages entering watercourses or the drainage system. These provisions satisfactorily address the requirement to prevent mud deposition on the highway and minimise the risk of polluted run-off.

Dust and Air Quality Management

3.26. A detailed Dust Management Plan forms part of the submitted management framework.

3.27. The dust assessment has been undertaken having regard to relevant IAQM guidance and identifies sensitive receptors and the potential effects associated with demolition, earthworks, construction and track-out.

3.28. The mitigation regime includes:

- regular on- and off-site inspection;
- recording of inspection results;
- increased monitoring during high-risk activities and dry or windy conditions;
- dust suppression;
- appropriate management of stockpiles and exposed material;
- wet cutting and suppression techniques;
- adequate water supplies;
- covered skips and enclosed chutes;
- minimisation of drop heights; and
- prompt cleaning of spillages.

3.29. The DMP/CMP specifically records that it has been prepared in accordance with Condition 6 and addresses the programme, traffic management, haulage, site layout, wheel washing, dust assessment and monitoring, noise and vibration, NRMM, complaints, mud tracking and storage of plant and materials.

NRMM and Construction Emissions

3.30. The submitted documentation includes specific requirements relating to Non-Road Mobile Machinery. Relevant plant is required to comply with the applicable GLA emission standards and be registered appropriately. Documentary evidence is to be retained and made available to the Local Planning Authority.

3.31. The strategy also prioritises the use of electric or battery-powered equipment where practicable and requires appropriate maintenance of construction plant. These measures provide appropriate control over emissions associated with construction machinery.

Demolition Material

- 3.32. Demolition material will not be processed on site. Material arising within each work zone will instead be retained temporarily for removal to an appropriate disposal facility.
- 3.33. This approach limits the potential additional noise, vibration and dust impacts commonly associated with on-site processing of demolition arisings.

Asbestos

- 3.34. An asbestos survey undertaken by Scancross Environmental Services Ltd is incorporated into the submitted documentation.
- 3.35. The survey identifies asbestos-containing or presumed asbestos-containing materials associated with the buildings proposed for demolition. The presence and management of asbestos have been expressly recognised within the demolition strategy.
- 3.36. No asbestos management plan has been included as all buildings containing asbestos are to be demolished. There is no intention for buildings containing asbestos to remain or to be used on-site.

Monitoring, complaints and community liaison

- 3.37. The submitted management framework establishes clear responsibilities for environmental monitoring and complaints.
- 3.38. The Developer's Project Manager will hold overall responsibility for environmental reporting and complaints. A complaints register will record:
- the nature of the complaint;
 - the date received;
 - action undertaken;
 - relevant timescales; and
 - responses provided.

3.39. Local residents affected by the works will be contacted and provided with appropriate project and contact information. Regular communication will thereafter be maintained concerning site activity, deliveries and traffic

3.40. The DCEMP is a live management document and provides for review during the works so that additional measures can be introduced where monitoring or site circumstances demonstrate that this is necessary.

Condition 6 Conclusion

3.41. The submitted information establishes a detailed and comprehensive framework for managing demolition and construction activity. In particular, it provides controls in relation to:

- programme and operating hours;
- construction access and routing;
- highway safety;
- contractor parking;
- pedestrian management;
- site compounds and materials;
- wheel washing and road cleaning;
- pollution prevention;
- dust and air quality;
- noise and vibration;
- construction plant and NRMM;
- asbestos;
- monitoring; and
- community liaison and complaints.

3.42. Taken as a coordinated package, the information addresses the objectives and substantive requirements of Condition 6 and provides a suitable basis upon which the Local Planning Authority can exercise continuing control over demolition and construction impacts

3.43. Condition 6 should therefore be discharged.

4. CONDITION 8 – LOW EMISSION STRATEGY

Requirement of the condition

- 4.1. Condition 8 requires the submission of a Low Emission Strategy prior to commencement.
- 4.2. The condition requires the strategy to address:
1. compliance with the London Plan and associated air-quality guidance;
 2. consideration of a FAST electric vehicle charging bay, above the minimum charging provision required by the London Plan; and
 3. a robust Travel Plan encouraging staff and users to:
 - use public transport;
 - walk and cycle where practicable;
 - participate in car-share schemes; and
 - use zero-emission vehicles.
- 4.3. The agreed measures are required to be maintained throughout the life of the development.

Low Emission Strategy

- 4.4. The submitted Low Emission Strategy, Ref. MA/VL/P25-3695/02, has been prepared specifically in response to Condition 8.
- 4.5. The strategy recognises the site's location within the Hillingdon Air Quality Management Area and considers the relevant policy framework governing air quality and emissions.
- 4.6. In particular, it identifies the policy requirement for development to:
- achieve appropriate reductions in emissions;
 - be at least air-quality neutral;
 - avoid unacceptable risks to sensitive receptors; and
 - contribute towards improvements in air quality within the AQMA.
- 4.7. The submitted LES therefore directly addresses the environmental purpose underlying Condition 8.

Design and operational measures

4.8. The LES identifies a package of design and operational measures intended to reduce emissions associated with the development.

4.9. These include:

- Air Source Heat Pumps as low and zero-carbon technology;
- energy-efficient building measures;
- enhanced ventilation;
- green infrastructure;
- measures to minimise exposure to pollution;
- appropriate construction standards;
- low-emission construction practices;
- implementation of the DLP/CLP and DMP/CMP; and
- measures promoting sustainable travel.

4.10. The strategy therefore addresses air quality holistically, considering both transport and non-transport sources.

Electric vehicle infrastructure

4.11. Electric vehicle infrastructure is incorporated within the proposed development.

4.12. The development provides 32 car parking spaces. Of these:

- two spaces will be served by active electric vehicle charging points; and
- a further two spaces will have passive electric charging provision.

4.13. The LES expressly considers standard and fast charging provision as part of the strategy for encouraging lower-emission vehicle use

4.14. The EV infrastructure forms one component of a wider strategy intended progressively to facilitate greater use of low and zero-emission vehicles and reduce transport-related emissions from the development.

Travel Plan

- 4.15. A site-specific Travel Plan, Ref. AF/VL/P25-3695/01, accompanies the LES.
- 4.16. The Travel Plan seeks to reduce dependence upon private-car journeys and encourage sustainable modes of travel amongst staff, residents and visitors.
- 4.17. A Travel Plan Coordinator will oversee implementation, liaise with management and staff and promote sustainable travel initiatives.

Public Transport

- 4.18. Public transport use will be promoted through Travel Information Packs and information boards.
- 4.19. Measures include:
- up-to-date bus and train information;
 - local route maps;
 - timetable information;
 - journey-planning resources;
 - promotion of existing local bus services;
 - information on public transport discounts and promotions; and
 - consideration of assistance with season-ticket purchase.
- 4.20. These measures will make public transport options readily accessible to staff, residents and visitors from the outset.

Walking and cycling

- 4.21. The Travel Plan includes a comprehensive package of active-travel measures.
- 4.22. These include:
- walking route information;
 - local cycling route information;
 - secure cycle parking;
 - staff shower facilities;

- lockers;
- promotion of walking and cycling health benefits;
- cycle journey-planning resources;
- promotion of national cycling initiatives; and
- information and support relating to cycle purchase, servicing and repairs.

4.23. The development itself also incorporates clearly defined pedestrian and cycle routes and new footway connections to Ducks Hill Road

Car Sharing and Low-emission Travel

4.24. Car sharing forms a specific element of the Travel Plan. The Travel Plan Coordinator will encourage the establishment of a staff car-share scheme, and promotional materials will explain the financial and environmental benefits of lift sharing.

4.25. A car-share calculator and supporting information will be promoted through induction material and on-site information boards.

4.26. The combination of car-sharing promotion and EV charging infrastructure provides a practical means of reducing both the number and emissions profile of private-car journeys associated with the development.

Proportionality

4.27. The measures contained within the Travel Plan have been developed having regard to the scale and nature of the approved C2 use.

4.28. The expected staffing pattern comprises approximately 12 daytime staff and four night-time staff, with relatively limited traffic generation associated with residents.

4.29. Notwithstanding the relatively modest level of trip generation, the Travel Plan provides a wide range of measures designed to influence travel behaviour from first occupation.

4.30. The strategy is therefore appropriately ambitious while remaining proportionate to the characteristics of the development.

4.31. Overall Low Emission Strategy

4.32. The LES brings together a coordinated package comprising:

- active and passive EV charging infrastructure;
- sustainable and active travel measures;
- public transport promotion;
- secure cycle facilities;
- car sharing;
- low and zero-carbon technology;
- low-emission construction practices; and
- construction logistics and environmental management.

4.33. The LES concludes that these measures will assist in reducing both transport and non-transport emissions associated with the development

4.34. The submitted strategy therefore provides an appropriate and proportionate response to the air-quality and sustainable-transport objectives underlying Condition 8.

4.35. Condition 8 should therefore be discharged.

5. PLANNING BALANCE AND CONCLUSION

5.1. Planning permission has already established the acceptability of the principle, scale, design and use of the approved development.

5.2. The present application is concerned solely with whether adequate details have been provided to satisfy the requirements of Conditions 6 and 8.

5.3. The Condition 6 submission establishes a comprehensive framework to ensure that demolition and construction activities are appropriately programmed, managed and monitored and that effects upon the highway network, neighbouring occupiers and the environment are minimised.

- 5.4. The Condition 8 submission establishes a coordinated Low Emission Strategy supported by a site-specific Travel Plan and a package of measures intended to improve air quality and reduce reliance upon higher-emission forms of transport.
- 5.5. The submitted documents should be read together as a coordinated package. They contain both physical mitigation measures and management procedures and establish mechanisms through which the performance of the development can continue to be managed as works progress and, in respect of Condition 8, once the development becomes operational.
- 5.6. The details submitted are appropriate and proportionate to the nature and scale of the approved development and satisfy the objectives and requirements of Conditions 6 and 8.
- 5.7. Accordingly, there are no planning reasons why approval of the submitted details should be withheld. The Local Planning Authority is therefore respectfully requested to approve the submitted details and discharge Conditions 6 and 8 of planning permission ref. 924/APP/2022/3603.