

Sustainability Appraisal Consultation Statement- Porters Way Planning Brief

1. Introduction

This Sustainable Appraisal Consultation Statement (integrating the requirements of Strategic Environmental Assessment-Environmental Statement) provides the details of the consultation on the Sustainability Appraisal (SA) of the Porters Way Planning Brief Supplementary Planning Document. It provides information on how the Supplementary Planning Document was changed as a result of the Sustainability Appraisal and responses to consultation and any implications for the SA.

A Sustainability Appraisal was prepared for the draft Porters Way Planning Brief SPD under the requirements of the Town and Country Planning (Local Development) (England) Regulations.

In addition, the ODPM guidance on Sustainability Appraisal for Regional Spatial Strategies and Local Development Documents, section 4.5.6 and Environmental Assessment of Plans and Programs Regulations 2004 (which covers the European Directive 2001/42/EC on Strategic Environmental Assessment) section 16.3-16.4, requires a Consultation Statement, after the adoption of the SPD, that lists the following information:

- (a) How sustainable considerations have been integrated into the plan or programme.
- (b) How the sustainable appraisal report has been taken in to account.
- (c) A list of consultation bodies and the availability of relevant documents
- (d) How the results of any transboundary consultations entered into have been taken into account
- (e) The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- (f) The measures that are to be taken to monitor the significant sustainable effects of the implementation of the plan or programme.

2. Key Stages involved in the preparation of the Porters Way Planning Brief and its Sustainability Appraisal Report.

These are:

- Production of the draft Porters Way Planning Brief - May/July 2005
- Production of Sustainability Appraisal Scoping Report of Draft Porters Way Planning Brief - July 2005
- Production of Sustainability Appraisal of Draft Porters Way Planning Brief - October 2005
- Consultation on the draft Porters Way Planning Brief and Sustainability Appraisal - October/November 2005
- Porters Way, West Drayton Sustainability Appraisal Consultation Statement - January 2005

3. How sustainable (environmental, social and economic) considerations have been integrated in to the plan or programme.

The scoping report was carried out in July 2005 and following key sustainability issues were identified:

- Air Quality
- Household Waste
- Flood Risk and Sustainable Urban Drainage Systems
- Noise
- Accessibility
- Education
- Open Space

The following details highlights the considerations taken in to the planning brief to address the above-mentioned sustainable issues.

(i) Air Quality: On a local level the West Drayton and Hillingdon's exceedences of government targets for nitrogen dioxide and particulate matter (PM10) have resulted in the designation of an AQMA with an air quality action plan produced to address this major problem in the borough. The area currently exceeds the national AQ objective of 40ug/m³. The Hillingdon Air Quality Action Plan aims to switch to cleaner transport modes and to tackle air quality through managing traffic.

Section 7.16 of the Porters Way brief covers the 'Air Quality' section. A section has been included to identify sustainable travel to minimise air quality impacts. The sustainability section at 7.2 has been strengthened to require this issue to be investigated and addressed as part of any planning application.

(ii) Household waste: The Porters Way Planning Brief should include principles on waste management according to the Planning Policy Guidance Note 10: Planning and Waste management.

Section 7.20 of the Porters Way brief covers the 'Waste management' and requires details of storage and collection for waste and recyclable materials as part of a site wide waste management strategy as well as the encouragement of more effective resource management in demolition and new build.

(iii) Flood Risk and Sustainable Urban Drainage Systems (SUDS): Sustainable Urban Drainage Systems have been suggested for new development to reduce flood risk, mitigate the effects of climate change and develop further steps to reduce the contribution to the climate change.

Section 7.17 of the Porters Way Brief 'Water and Waste Water', emphasises number of recommendations for the disposal of surface water and Section 7.19 'Drainage and Surface Water' which recommends

proactive design systems to integrate surface water in landscape design such as SUDS.

(iv) Noise: Aircraft noise from Heathrow has been identified as a problem, which needs consideration.

Section 7.17 of the Porters Way brief covers the 'Noise' and requires a noise assessment for development proposals to meet PPG24 and protect residents from road, rail and air noise.

(v) Accessibility issues: The Porters Way has a large site area to improve accessibility so it is suggested to consider the Disability and Discrimination Act and to consider the Hillingdon Design and Accessibility Statement (HDAS) principles for the new development.

Section 7.21 of the Porters Way brief covers 'Access for all'. Development will be required to be built in accordance with the "Lifetimes Homes" standards and the Disability Discrimination Act and is also required to address the requirements of the HDAS.

(vi) Education: 32% of the population in West Drayton does not have any educational qualifications.

The planning brief promotes a sustainable mixed use community and promotes a mix of other uses appropriate for a residential area including a small scale starter units, live/work units, small scale retail units and education /health/police and community facilities. This is intended to allow greater accessibility and opportunities to the resources, services and facilities to new and existing residents. In addition section 7.22 may require planning obligations for a training contribution in the form of funds for construction or other appropriate training.

(vii) Promotion of provision of open space: It is suggested to consider the Hillingdon Design and Accessibility Statement (HDAS) that includes the amenity standards for the residential development.

Section 7.13 of the Porters Way brief covers the ' Private Amenity Space and Public Open spaces'. This section details the open space requirements as outlines in the current UDP and draft LDF. Section 7.8 Design Approach encourages high quality design of any proposed development. Planning obligations may be sought to provide appropriate leisure and recreation facilities.

Other sustainability issues that have been considered in the Porters Way Planning Brief are water and waste water, drainage and surface water, contaminated land, building scale and height, environmental impact assessment, design approach, biodiversity, community safety and community facilities.

4. How the Sustainability Appraisal Report has been taken in to account in the final Porters Way Planning Brief

The sustainability appraisal identified some key areas where the inclusion of certain changes will help mitigate for some of impacts identified. The following table identifies the recommendations made in the SA and the consequential changes (or otherwise) that were undertaken.

Table 1.0: List of the changes adopted in the final Porters Way Planning Brief and the Sustainability Appraisal recommendations	
Sustainability Appraisal recommendations for the Porters Way Development Brief	Changes made to the draft Porters Way Brief or reasons why Brief was not changed.
<ul style="list-style-type: none"> Effects on air quality from increased development and traffic will require further investigation, including the effects from increased freight movements within the Hayes – West Drayton corridor. 	<ul style="list-style-type: none"> Section 7.15 (Air Quality) was strengthened to emphasize the need to protect air quality by reference to sustainable travel measures and energy efficient technology. Sections 7.7 Brief recognises that the site is adjacent to rail corridors and that consideration is required for any development. Section 7.16 requires a noise assessment for development proposals.
<ul style="list-style-type: none"> Industrial and business related transport should be diverted where possible away from residential areas. 	<ul style="list-style-type: none"> The brief promotes a mix of uses appropriate for a residential area and has a number of objectives to protect residential area (objective v). Section 6.2 identifies types of business uses that are inappropriate due to traffic impacts. A transport assessment will be required with any planning application with consideration to pedestrian safety and impacts on local and trunk road (section 7.6.4). Live/work units are considered likely to reduce traffic by allowing residents to work locally. Section 7.6.4 identifies mitigation works that may be required.
<ul style="list-style-type: none"> Building and construction undertaken as part of the regeneration initiatives, needs to take consideration of sites of nature conservation importance and sites of special interest in the early planning stage. 	<ul style="list-style-type: none"> These impacts are to be addressed and mitigated through the requirements of EIS (which requires ecology to be considered) and/or planning applications. Section 7.1 requires an EIS for major projects. Section 7.11.3 requires a biodiversity assessment with any planning application including identification of any mitigation measures with reference to the Hillingdon Biodiversity Plan. Section 7.2.1 has been strengthened to require sustainability to be

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	considered at all stages of the planning process including impacts on wildlife and habitat.
<ul style="list-style-type: none"> Development on flood risk zones should be avoided where possible. Development near flood risk sites needs to mitigate the effects of flooding. Flood risk information from the Environment Agency should be used. 	<ul style="list-style-type: none"> Section 17.17 and section 17.18 requirements regarding flood and surface water run off have been strengthened in to minimise water usage and consider proactive design to reduce runoff such as sustainable drainage systems to reduce water run off and undertake a surface water runoff assessment.
<ul style="list-style-type: none"> There should be provision of sustainable urban drainage systems (SuDS) in the new development. 	<ul style="list-style-type: none"> Reference to SuDs has been included in section 7.18 to minimise surface runoff.
<ul style="list-style-type: none"> Seek that new residential and commercial development are built to 'excellent' rating, which includes seeking accordance with the London Plan sustainable design and construction SPD, BREEAM and Ecohomes standards. 	<ul style="list-style-type: none"> In section 4.2 consideration will be required for the London Plan (SPG referred to 7.8.6) and sustainability objectives of the LDF. Section 7.2 has been strengthened to consider sustainability at all planning stages and promotion of sustainable design and construction methods. These measures are detailed with in the core strategy and it is considered that policies at this level will mitigate for possible effects.
<ul style="list-style-type: none"> Apply building efficiency standards and encourage the consideration of renewable energy sources. 	<ul style="list-style-type: none"> Section 7.2 has been strengthened to promote sustainable design and construction and renewable energy. Renewable energy sources have been required to be considered in the design stage (section 7.8.7)
<ul style="list-style-type: none"> Provide convenient communal waste management facilities (for residential and commercial area users) within the redeveloped area. 	<ul style="list-style-type: none"> Waste management, storage and recycling details are required through the brief including specific siting requirements in section 7.19. In addition planning conditions would be applied to address this.
<ul style="list-style-type: none"> Incorporate the consideration of the Hillingdon BAP to protect sites of nature conservation interest, protect wildlife corridors, in the shape of green chains, and limit the amount of infill development on back garden and open space. 	<ul style="list-style-type: none"> Wildlife provisions have been strengthened in s 7.11. A biodiversity assessment is required to be submitted with any planning application, with reference to the Hillingdon BAP (section 7.11) Section 7.2 has been strengthened to require the impacts on wildlife and habitat be investigated and addressed in any planning application.

5. A list of consultation bodies and the availability of relevant documents

Consultation on the Porters Way Planning Brief and Sustainability Appraisal

Consultations were carried out from 12 October 2005 to 9 November 2005 on the Draft Planning Brief for Porters Way and the accompanying Sustainability Appraisal, as required by the Environmental Assessment of Plans and Programmes Regulations (2004). The Porters Way Planning Brief and the SA was included in the wider Local Development Framework (LDF) Borough-wide consultation. It was:

- Advertised on 12th and 13th October 2005 in the local press (being the Uxbridge and West Drayton Gazette, Ruislip and Northwood Gazette, Hayes and Harlington Gazette, Uxbridge and Hillingdon Times).
- Advertised in Hillingdon People
- Advertised in all the libraries, all the General Practitioners and the Hayes One-Stop-Shop
- Notification on Council's website with copies of the documents available for viewing from the 12th October 2005.

Additionally, as included in the wider LDF consultation, there was also:

- LDF Publicity and officer's presence at Brunel University Careers Fair
- LDF Publicity stand and officer's presence at the Council's Democracy Week
- Inclusion in the LDF Road Show – 8 half days where officers where met the general public with the use of the LDF trailer. The trailer was parked on four different locations within the borough.
- Letters sent to statutory and non-statutory consultees, local residents, organisations and interest groups
- Three public meetings for the LDF which included the draft Porters Way SPD where held at:
 - Uxbridge: Civic Centre – 26.10.05
 - Ruislip: Winston Churchill Hall – 29.10.05
 - Hayes: Uxbridge College (Coldharbour Lane) – 03.11.05

An informal "drop in" session at the Bell Farm Christian Centre Hall for local residents to view, discuss and make submissions on the draft Porters Way Brief on 2nd November from 4.00pm to 7.00pm.

List of Consultees and other local authorities

The following statutory consultation bodies and few other local authorities required under the planning regulations and the Sustainability Appraisal guidelines were contacted:

<p>Statutory Consultation Bodies</p> <ul style="list-style-type: none"> • Countryside Agency • Department of Environment, Food and Rural Affairs – DEFRA • English Nature • Environment Agency • Government Office for London • The Mayor of London Borough of Hillingdon Highways Agency • Historic Buildings and Monuments Commission for England • London Development Agency • London Waste Regulation Authority • North West London Strategic Health Authority • Strategic Rail Authority 	<p>Adjoining Local Authorities:</p> <ul style="list-style-type: none"> • London Borough of Ealing • London Borough of Harrow • London Borough of Hounslow • Slough Borough Council • South Bucks District Council • Spelthorn District Council • Three Rivers District Council • Hertfordshire County Council • Surrey County Council • Abbots Langley Parish Council • Burnham Parish Council • Chorleywood Parish Council • Croxley Green Parish Council • Denham Parish Council • Dorney Parish Council • Farnham Royal Parish Council • Fulmer Parish Council • Gerrards Cross Parish Council • Hedgerley Parish Council • Iver Parish Council • Sarratt Parish Council • Stoke Poges Parish Council • Wexham Parish Council
<p>Relevant telecommunications, electricity and gas companies and water undertakers</p> <ul style="list-style-type: none"> • British Gas Properties • British Telecom • British Thames • Transco • BT Cellnet • BT Group • Cable and Wireless • Eastern Electricity • Engergis Communications • National Grid • North Surrey Water Company • Southern Electricity PLC • Thames Water Utilities Limited • Transco • Vodafone -Planning & Property Department 	<p>General Consultation Bodies:</p> <ul style="list-style-type: none"> • Residents Associations, Tenants Associations • Conservations Panels, Local History Societies • Heathrow Airport related organisations • Black and minority ethnic organisations • Chambers of Commerce/Trade • Organisations providing Community services • Planning Consultants, Developers, Constructors, Architects, Solicitors • Ecology, nature conservations and other environmental organisations • General practitioners • Other healthcare organisations • Hillingdon Lifelong Learning Partnership • Housing Association • All 17 Hillingdon Libraries • Local Businesses • Other Individuals and organisations • Transport related organisations • Other consultees who council considered relevant stakeholders.

The following local groups were contacted:

- Yiewsley and West Drayton Town Centre Action Group
- Yiewsley and West Drayton Community Centre
- Hayes and Harlington Community Development Forum
- Yiewsley & West Drayton Town Centre Action Group
- West Drayton Institution Group
- Bell Farm Residents Group
- Age Concern Hillingdon
- Amberley Lodge Service Citizen Centre
- Citizen's Advice Bureau (Yiewsley)
- Com Café
- Hillingdon Community Transport
- Hillingdon Council Tenants and Residents Federation
- Porters Way Development Group

Over 750 letters were sent to the homes of residents in the immediate vicinity of the Porters Way site. This included residents on Holly Gardens, Hawthorne Crescent, Boxwood Close, Kingston Lane (east side), Kings Road, Queens Road, Porters Way, Hanson Close, Percy Bush Road, Starveall Close, Pocock Avenue, Brickfields Avenue, 73 Thornton Avenue, North Road (north side), West Road (north side), South Road (west from West Road to Porters Way), South Close, Almond Avenue (between Oak Ave and South Road), Mulberry Parade (shops and flats) Mulberry Crescent (east of no. 55) and Rutters Close.

In addition local residents and the subject site owners and/or their agents were contacted. Letters were also sent to those individuals who objected to the planning applications regarding the RAF Porters Way site.

To read more on 'how the public and Council Members were involved in the whole process', please refer to the Adoption Statement for the Porters Way Planning Brief.

Availability of the draft Planning Brief and Sustainability Appraisal report

The relevant documents were available during the consultation period at the following locations:

- At the Civic Centre (Planning Reception), all libraries and Hayes One-Stop-Shop.
- The Porters Way Planning Brief and Sustainability Appraisal could be viewed on Council's website from the 12th October 2005.
- Copies of the Porters Way SPD document and CDs were given to members of the Yiewsley and West Drayton Town Centre Action Group, the Porters Way Development Group and interested local residents.

6. How the results of any consultations relevant to the Sustainability Appraisal have been taken into account in to the final Porters Way Planning Brief

The following details the results of the consultation process and how this affected the final Porters Way Planning Brief and its associated implications for the SA.

The first column details the objection made and who made it, the second, the changes made to Brief as a result of this and, the third column outlines whether the change to the brief was significant enough to require a further sustainability appraisal or the reason why the existing SA was adequate.

A detailed summary of all the responses made on the planning brief and the comments on them can be obtained from the “Adoption Statement” for the Porters Way Brief.

Table 2.0: Results of Consultation Process for Planning Brief.		
Objection	Amendments to Brief Undertaken	Implications for any further Sustainability Appraisal
<p><u>English Heritage</u></p> <p>Development proposals should include an assessment of the archaeological potential of the site, and the impact that the development will have upon any archaeological remains present. Should the potential for archaeological remains be identified, further archaeological investigation, which may include field evaluation and subsequent mitigation, if required, will be undertaken.</p>	<p>Para 7.1.1 amended to require specific assessments including archaeology.</p>	<p>Changes merely strengthen existing EIA archaeology requirements and identify that field investigation, mitigation and monitoring are required. No significant change to brief. Considered to meet SA objective landscape, townscape and cultural heritage character.</p>
<p><u>Highways Agency, Dorking, Surrey</u></p> <p>Section 2.0.1 – 2.0.7 and site specific location maps. Neither the local or national strategic trunk road network is noted in the site characteristics for areas A – D.</p> <p>The HA considers that developers should mitigate any material residual impact upon the trunk road network, whether caused by a specific site in isolation or in combination with others.</p>	<p>Para 2.0.1. Amended to note the road network.</p> <p>Para amended 7.6.4 to include the trunk road impacts. .</p>	<p>Factual change to identify the road which access subject site. No significant change to brief.</p> <p>A Transport Assessment was required at section 7.6.4 - this has now been strengthened to specify trunk road impacts as well as local impacts. No significant change to brief. Considered consistent with SA transport objectives. .</p>
<p>Section 2.0.6 - Area C and site</p>	<p>Para 7.6.4 has been</p>	<p>The transport assessment</p>

<p>specific location maps. To achieve an integrated outcome, minimising impact on the highway network, a single integrated strategy should be adopted across all three development sites.</p> <p>5.0.1 Development Objective ii. Object The HA notes that the aim to ensure sustainable development in relation to the environment and community, however, there is no mention of sustainable transport. The HA recommends that sustainable transport should be considered as a proactive input to the development process and, as noted above, that residual traffic impacts caused by the proposed development should be considered in relation to both the local roads and national trunk road network.</p> <p>Section 7.2.1 Object - Sustainability section does not mention sustainable transport. The HA recommends that sustainable transport issues and options should be considered as a proactive input to development, and as noted above that traffic impacts of the development should be considered in relation to both the local and wider trunk road network.</p> <p>Section 7.6.5 The HA notes that the consultation document identifies that the developers would have to mitigate any highway impacts associated with the development. In the HA's view, the assessment of highway impacts should explicitly extend to the trunk roads, in particular in M4 and M25 within the Borough which are already heavily congested.</p>	<p>amended to refer to an integrated transport strategy.</p> <p>Objective refers to sustainable transport. Para 7.6.4 has been amended to include the trunk road impacts and sustainable transport</p> <p>Para 7.2 amended to include all sustainability at all stages of the process. Sustainable transport measures required in section 7.6.4</p> <p>Para 7.6.4 amended to include the trunk road impacts.</p> <p>Amend para 7.6.4 to include the trunk road impacts.</p>	<p>has been strengthened to require as part of this an integrated transport strategy. This is considered to clarify existing requirements in the Brief. No significant impact.</p> <p>Changes to refer to sustainable transport clarifies the requirements of the transport assessment in sect. 7.6.4 and the requirements of objective 5.2 xi. Section 7.6.4 has also been amended to refer to trunk road impacts that clarify the specifics of the transport assessment. No significant impact.</p> <p>Amendments to paras 7.2 and 7.6.4 are to clarify points made. No significant change for Brief.</p> <p>No significant change to brief. See previous comments.</p> <p>No significant change to brief. See previous comments.</p>
<p><u>Thames Water, Reading</u></p> <p>Planning permission should be granted for drainage on</p>	<p>Amend para 7.17 to refer to funding requirements of</p>	<p>Change is a procedural matter. No significant</p>

<p>condition that there is adequate capacity in the wastewater network to meet needs of development. May be necessary for developers to fund studies and infrastructure upgrades.</p> <p>Responsibility of developer to make proper provision for ground, watercourse or surface water sewer. In disposal of surface water, the applicant is recommended to: Ensure new connections to public sewerage system do not pose an unacceptable threat of surcharge, flooding or pollution. Proposals should be in line with DETR advice that encourages disposal on site without recourse to the public sewerage system. Foul and surface water should be separated on all new developments.</p>	<p>Thames Water.</p> <p>Para 7.18 amended to refer to proper provision for surface water drainage.</p>	<p>change to Brief.</p> <p>Brief previously made refer to adequate water and wastewater disposal in section 7.18. Inclusion of new clause expands on these requirements. No significant change to brief. Changes considered consistent with soil and water objectives of SA.</p>
<p><u>Environment Agency</u></p> <p>The following policies should also be included in Section 4, relevant planning policies 4.0.2: PS9: Biodiversity & Geological Conservation, PPS 23: Planning and Pollution Control, PPG Note 25: Development and Flood Risk and the following planning policies referred to reflect the latest revisions to PPS 1: Delivering Sustainable Development and PPS 22: Renewable Energy.</p> <p>Support section, 5 Objective ii): The most important, should be re-ordered accordingly to become objective i). Current wording is contradictory – should be re-worded to read simply 'To ensure development is sustainable'.</p> <p>Section 5 Objective vi): Whilst we support this objective, there is no provision for the enhancement of the natural environment for biodiversity. Either this objective should be widened or a new objective included to provide a framework</p>	<p>Para 4.0.2 amended to include the relevant government guidance.</p> <p>Para 5.0.1 amended to re-order objectives i and ii. Amend wording of objective ii.</p> <p>Objective vi in 5.0.1 now amended to include provision for the enhancement of the natural environment for biodiversity.</p>	<p>Factual change to section 4 to update brief to delete reference to old policy and refer to updated Government policy which should have been subject to own appraisals. No significant change to brief considered.</p> <p>Reordering of objective in section 5 not considered a significant change. Rewording of new objective i is not considered to significantly differ from previous. No significant change to brief.</p> <p>Objective vi (landscaping design) now expanded to include reference to biodiversity interests. No significant change to brief. Considered to be consistent with SA biodiversity objective.</p>

<p>for maintaining, enhancing, restoring and adding to biodiversity interests across the whole area.</p> <p>Section 7.8: Design Approach (p35) Support this approach as it encourages the principles of sustainability and high quality design. We request the following addition to point 7.8.3 (p36): Although there are no nature conservation designations that apply to the sites, enhancement of the sites generally for biodiversity value is important and we recommend this issue is included within this consideration.</p> <p>Support consideration of 7.18 Drainage and surface water (p 41). However, the first sentence should read 'The sites are not within an area of fluvial or tidal flood risk', because surface water flood risk is still an issue. According to Flood Zone maps, the sites fall within Flood Zone 1 (lowest probability of flooding from rivers and the sea, where the chance of flooding in any one year is less than 0.1% (a 1000 to 1 chance). A Surface Water Flood Risk Assessment, in accordance with PPG 25, ha should accompany any proposals for development over 1.</p> <p>Section 7.20 support precautionary approach for contaminated land (p42) in line with PPS23. You should also make reference to the Environment Agency's Contaminated Land Report 11: 'Model Procedures for the Management of Land Contamination ' because any future development should be carried out in line with the procedures contained within this document.</p>	<p>Para 7.8.3 amended to refer to measures to enhance the natural environment for biodiversity.</p> <p>Amend para 7.18.1 to refer to surface water flood risk and requirements of PPG 25.</p> <p>Amend para 7.20.4 to refer to the Environment Agency's Contaminated Land Report 11.</p>	<p>This section promotes sustainable and high quality design, inclusion of biodiversity considerations clarified this point. No significant changes to brief.</p> <p>Change to accord with provisions of Govt policy. No significant change to intent of section 7.18 and to brief</p> <p>Reference to study and procedures not considered significant change to Brief.</p>
<p><u>Summary of objections by 12 local residents</u> <u>Safety for locals and school children from the development</u></p>		

<p><u>and during construction.</u> Concerns about traffic safety, site is on a school route cars do speed along Porters Way, with added traffic this will increase. Pedestrian crossings should be put in place before the construction trucks arrive as a lot of people already use it to walk to schools etc. Should be made safe particularly for young children to walk to and from schools. Although 30mph zone, vehicles speed.</p> <p>2) <u>Accessibility</u> Disabled access needs improving, needs priority not just on new areas but also from them to other areas. E.g., West Drayton train station has no disabled access, also a problem for elderly, people with pushchairs etc. Paved areas & dropped kerbs extremely uneven in locality that is dangerous to anyone in a wheelchair.</p> <p>6) <u>Address pollution</u> Construction will cause problems for local residents from lorries, noise, dust, dirt and traffic implications on local roads and in West Drayton High Street.</p> <p>10) <u>Shops</u> <u>Shops should be retained.</u> Do they need to be pulled down? They should be left alone. If the charges were lowered they (the shops) would make money out of it.</p> <p><u>New shops to be a community focus.</u> In developing Area C the area will lose local shops. Must be resited with easy access. They are a focal meeting place for people. If existing shops are removed new shops must be provided to retain the community focal area.</p> <p>Would like to see local entrance to shops (on site)</p>	<p>Para 7.6.4 amended to refer to pedestrian safety for local people and school children during the construction phase and thereafter. Paras 7.6.2 – 7.6.5 already refer to the requirement for pedestrian facilities.</p> <p>All new developments are required to comply with the London Plan (Policies 3A.4 and 4B.5) and the Hillingdon Design and Accessibility Statement – Accessible Hillingdon New para. 7.8.10 included to refer to the above policy documents.</p> <p>The requirement for measures to protect local residents from dust and noise during construction works is already recognised in the Brief in para 7.16.1. Para 7.6.4 to be amended include measures for pedestrian safety during construction works.</p> <p>Amended objectives ix and xv in para 5.0.1 and para 7.9.3 to retain shops in Area C with improvements to these shops and additional community facilities to strengthen this focal point. Insertion of environmental improvements in 7.22.1 planning obligations to improve area.</p>	<p>Clarifies issues to be considered. Does not change the intent of para 7.6.4 that discusses requirement for transport assessment and details to be considered. No significant change to brief. Considered consistent with residential environments objective in SA.</p> <p>Change to refer to approved planning documents not considered to change intent or outcome of section 7.8.10. No significant change to brief.</p> <p>Amendment to 7.6.4 Considered to clarify issues that require consideration in a traffic assessment. No change to intent. No significant changes to brief.</p> <p>The Brief has been altered to retain the shops and flats at Area C with proposals to ensure integration, connection and upgrading as part of the comprehensive redevelopment of the remainder of the Porters Way site. This alteration will not affect the derived principles of the Brief and is not considered to be so significant as to require a new SA, as the general location of a community focal point is moved along Porters Way and Area C, (which was intended for residential) retains the</p>
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<p>The new shops to open on Mulberry Parade should be opened before the old ones are demolished.</p>	<p>.</p>	<p>status quo with improvements. This approach is considered to still meet other objectives of the Brief to achieve requirements of a sustainable mixed use community and the SA objectives.</p>
<p><u>Chairman Bell Farm Residents Association, West Drayton</u> Pollution, noise and air, at the construction stage will make the lives of people living in Porters Way unbearable as this road is already highly used. People will also start to cut through North and South Road, the Bell Avenue to access Sipson Road.</p> <p>Why movement of local shops as currently serve the local community and are well situated between Bell Farm and Mulberry Crescent Estates. To move them would increase the distance any residents of Mulberry have to travel.</p> <p>Site access to the new site is planned to be singular, at the current NATS entrance. Plans show the shops will be built at the access point, creating further problems, as people will be parking at the access to the new proposals or on Porters Way.</p> <p>Query half space requirement, parking between 1.5 and 2 parking spaces per housing unit.</p>	<p>The requirement for measures to protect local residents from dust and noise during construction works is already recognised in the Brief in para 7.16.1. Amended para 7.6.3 to include measures for pedestrian safety during construction works.</p> <p>Shops retained changes to objectives ix & xv.</p> <p>Shops retained. Delete reference to a focal entrance in objective ix in para 5.0.1. Para 7.6.4 refers to vehicular accesses off Porters Way.</p> <p>Para 7.6.7 in the Brief refers to the Council's car parking standards, which specify 1.5 spaces per flat and 2 spaces per house. In practice the 1.5 standard allows for one space to be allocated per flat with some allowance for visitors and those that may require an additional space. Amend para 7.6.7 to include reference to the 'Preferred Options' LDF Core Strategy Appendix 1 Parking Standards and London Plan Parking Standards.</p>	<p>Clarifies requirements of transport assessment of section 7.6.3. No significant change for brief.</p> <p>See comments above. No significant change impacting on SA.</p> <p>See comment about Area C above. Clarification of more than one access point to Porters Way is not considered to alter original intent of brief. No significant impact for SA.</p> <p>Factual change to reference to LDF core strategy that has already had sustainability appraisal.</p>
<p><u>John McDonnell MP on behalf of attendees at a public meeting</u> Proposed housing density is too high with concerns at the impact</p>	<p>Changes to strengthen traffic considerations at para 7.6.4, clarification of air pollution requirements at para 7.15.</p>	<p>Clarifies requirements to for transport assessment and to address air quality. No change to intent of</p>

<p>on traffic and air pollution</p> <p>Concern over loss of shopping facilities and their accessibility if moved. Assurance sought that retail units be kept open until new ones are opened. Scepticism of density for retail purposes.</p> <p>Not viable to have just one entrance in and out of the proposed site.</p> <p>Concerns with lack of consideration of road safety and detailed proposals were called for to tackle road safety implications.</p>	<p>Density altered to 1b – 2 as a result of recent planning approval</p> <p>Shops retained, changed objectives ix and xv.</p> <p>Delete reference to a focal entrance in objective ix in para 5.0.1. Para 7.6.4 refers to vehicular accesses off Porters Way.</p> <p>Para 7.6.4 amended to refer to pedestrian safety.</p>	<p>sections. No significant change to brief. Density implications for SA discussed below.</p> <p>See comments above. No significant changes to derived principles of brief and SA.</p> <p>Intent was not to restrict to one access, change is clarification of point. No significant change for brief.</p> <p>Clarifies issues to be considered in transport assessment in para 7.6.4. No significant change for brief.</p>
<p><u>Local Shopkeeper</u></p> <p>Is unfortunate none of the shopkeepers on Mulberry Parade were informed of the meeting on 7th November at Bell Farm Church, as we come under Area C. Are we (Mulberry Parade Shops) to be given first refusal on any new shop units designated for Area A/B? If the properties are privately owned will the council negotiate justifiable rents? Do we have a say in the size and location of the units to be built?</p>	<p>Shops to be retained Objectives ix and xv are altered to refer to community focus. Requirement for planning obligations to address improvements and community safety to local centre.</p>	<p>Changes to brief are not considered to be significant to require reassessment of sustainability appraisal. Derived principles of the SA remain the same; proposal is able to meet overall intent of community focal point and sustainable mixed-use community and the SA objectives.</p>
<p><u>Broadway Malvan.</u> <u>Representations made on behalf of St George West LTD (SGWL) (RAF site).</u></p> <p>Not appropriate to set out requirements for mixed use for Area A when current allocation is residential. New requirements can only be introduced if existing allocation is superseded through LDF process following consultation and independent examination. The brief is overly prescriptive, with specific standards being stipulated, part of document will become out of date as standards change. Developer</p>	<p>The Brief supports a residential-led scheme and promotes a mix of other uses to ensure that development is sustainable, in line with PPS1: Delivering Sustainable Development. It is consistent with the adopted UDP, the LDF Preferred Options documents, the London Plan and national policies. Amended objective v in para 5.0.1 to reflect the primary</p>	<p>Objective v was strengthened to clarify this point in accordance with existing provision of section 6 (preferred land uses). The intent of the brief to provide a sustainable residential led mixed-use scheme has not altered. No significant change to brief.</p>

<p>has reduced scope to deliver innovative design & housing & the Brief will constrain development.</p> <p>Specific points objected to: Para 4.0.1 - adopted brief does not relate only to the appeal site of site for UDP Policy PR8. Para 4.0.5 - UDP Policy PR8 does not include any part of Area B in draft brief.</p> <p>Para 5.0.1 (ix) – focal entrance point implies single access point. This is inappropriate – Area A is already allocated – separate access is necessary, access cannot be dependant on Area B, issue of appropriateness has not been demonstrated in terms of highways / transport consideration. Site could be sterilised for development until 2008 & beyond.</p> <p>Para 7.4.7 -request reference to mix of tenure in each perimeter block be deleted</p> <p>Para 7.5.2 – should acknowledge proposed action 5A of DSRDF which outlines that boroughs should include detailed proposals for highest densities in their LDF - Brief fails acknowledge GLA report which supported a density range of 300 – 450 hrh and stated that the development generally accords with the sustainable development policy approach set out in the London Plan.</p> <p>Para 7.9.1 - object to implied reference to 1 point of access, principle of separate access has been established by recent planning applications, Area cannot be made dependant on single access from Area B, issues of appropriateness of a</p>	<p>residential use of the sites.</p> <p>Amended para 4.0.1 to reflect that the Brief includes the northeastern part of Site B. Part of Area B is covered by UDP Policy PR8.</p> <p>Deleted reference to a focal entrance in objective ix in para 5.0.1. Para 7.6.4 refers to vehicular accesses off Porters Way.</p> <p>Deleted reference to ‘each perimeter block’ in former para 7.4.7 (new para 7.4.12) and includes reference to dispersal in small groups.</p> <p>The density proposed in the Brief is considered to be appropriate for this large site, given its suburban location, limited local services, the distance to the town centre and the frequency of bus services. The PTAL of 1b has been reviewed for some parts of the site for a PTAL level of 2, subject to the recently approved permission for the footpath being implemented.</p> <p>Deleted reference to a focal entrance in objective ix in para 5.0.1. Para 7.6.4 refers to vehicular accesses off Porters Way.</p>	<p>Factual change in accordance with existing planning policy. No significant change for brief.</p> <p>Clarification of more than one access point to Porters Way. No significant change for SA.</p> <p>Change does not alter overall intent of section 7.4.12 to achieve mixed communities. No significant change for brief.</p> <p>The density alterations to the Brief to consider a PTAL of 1b – 2 on the north part of the site are consequential as a result of an approved footpath link to West Drayton Station. The change is not considered to have significant implications for the SA As the development will still be required to accord with the objectives and requirements of the Brief. and the derived principles assessed in the SA remain.</p> <p>See previous comments on clarifying more than one access above, no significant change for brief.</p>
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<p>single access point has not been demonstrated. Fails to recognise issues of multiple ownership.</p> <p>Disagree para. 7.13.1 – existing children’s playground facility is within 0.25 miles of the site at Stockley recreation ground opposite Mulberry Parade.</p> <p>Para 7.15.3 – density of development should not be restricted to reduce negative impacts on air quality. Sustainable travel measures can mitigate adverse impacts</p>	<p>Some areas of the Porters Way sites are within 400m of the recreation ground near Mulberry Parade but not all. Para 7.13.1. amended.</p> <p>Amended para 7.15.3 to refer to sustainable travel measures and delete reference to air quality and PTAL.</p>	<p>Clarification of factual change, no implications for intent of para 7.13.1 in brief.</p> <p>Amendment to strengthen para 7.15.3 to address air quality. No significant change.</p>
<p><u>Defence Estates (NATS site), submitted by GVA Grimley</u>. <u>Land ownership</u> – (policies nos 5.0.1(ix), 5.0.1 (x), 7.6.4, 7.9.3) need consideration of multiple ownership and subsequent impacts on deliverability of the Planning Brief. Each landholding should be able to be developed in isolation; in context of a comprehensive framework by ensuring areas A and B have own vehicular access. Current brief suggest that access should be from Porter’s Way in vicinity of existing entrance to NATS that could make Area A reliant on Area B for vehicular access.</p> <p><u>Residential uses</u> – (policies 5.0.1 (i), 5.0.1(v), 6.0.1, 7.3.3-4). The provision of housing should be key objective for NATS site. Planning policy position and shortage of land suitable for residential development creates a position where suitably located previously developed land should be redeveloped as efficiently and effectively as possible to meet objectives of London Plan.</p> <p><u>Residential Density</u> – (policies 2.0.1,5.0.1 (i), 7.5.1-2, 7.10.1) Brief should be amended from 50 – 80 DPH to 100-150DPH. In consistency between Brief and draft SHAAP in terms of density. Both should adhere to</p>	<p>The Brief aims to allow sites to be developed independently but subject to satisfactory resolution of issues identified to ensure for an integrated and sustainable community, and in consideration of adjoining sites and the neighbouring area. Deleted reference to a focal entrance in objective ix in para 5.0.1. Para 7.6.4 refers to vehicular accesses off Porters Way.</p> <p>Amended objective v in para 5.0.1 to reflect the primary residential use of the sites.</p> <p>The density proposed in the Brief is considered to be appropriate for this large site, given its suburban location, limited local services, the distance to the</p>	<p>See previous comment on clarifying more than one access point for Porters Way. No significant change for brief.</p> <p>Considered to clarify a mixed-use residential led scheme for site. No significant change for brief.</p> <p>See comments on density above and changes to PTAL as a consequence of another planning approval. Not considered to be a significant alteration to</p>

<p>the GLA's interpretation of table 4B.1 which contends that most of the area is "urban" and suitable for development at 300 – 450 hrh (100 – 150 DPH).</p>	<p>town centre and the frequency of bus services. The PTAL of 1b has been reconsidered for some parts of the site for a PTAL level of 2, subject to the recently approved permission for the footpath being implemented.</p>	<p>brief with requiring a re-appraisal of SA.</p>
<p><u>Retail and Community uses</u> – (policies 5.0.1 (v), 5.0.1 (ix), 5.0.1 (xv), 6.0.1, 7.3.3-4, 7.14) brief should be amended to state existing local centre in Area C is the most appropriate location for community and retail uses as is in existing use and that uses do not require reprovision within the NATS site. Existing centre is well established and increase in local population generated by the proposed retail development would help sustain existing businesses. Vacant floor space in existing center would be suitable for community uses.</p>	<p>Amend objectives in para ix and xv in par 5.0.1 to retain existing shops at site C. Notwithstanding this, sites A and B will be required to provide some additional community facilities/services on site, and also to contribute to environmental improvements at site C. Amend para 7.22.1 to include these planning obligations.</p>	<p>See above, not considered to be change significant enough to require reappraisal of Brief for SA as objectives can be met and derived principles assessed in SA remain the same.</p>
<p><u>Employment</u> - (policies 5.0.1(v), 5.0.1 (xvi), 6.0.1, 7.3.3-4) Requirement for B1 should be omitted. NATS site considered suitable by DE, GLA, LBH, therefore B1 is not considered appropriate. LBH & GLA recognize that there is a substantial amount of employment land available in the Hayes/West Drayton area and shortage of housing in the capital, therefore little justification for this use to take up land suitable for housing.</p>	<p>The Brief supports a residential-led scheme and promotes a mix of other uses to ensure that development is sustainable, in line with PPS1: Delivering Sustainable Development and PPG3 . It is consistent with the adopted UDP, the LDF Preferred Options documents, the London Plan and national policies. Amended objective v in para 5.0.1 to reflect the primary residential use of the sites.</p>	<p>See comment previously – emphasising residential led scheme. NO significant change for Brief.</p>
<p><u>Car Parking Standards</u> – (policy 5.0.1 (xiv), 7.6.7) Brief should comply with the car parking standards established by Table 4B.1 of the London Plan. Parking levels set out in the brief are already out of date in relation to national and London-wide guidance.</p>	<p>Since the draft Brief was published, parking standards have been reviewed in the LDF 'Preferred Options' Core Strategy Appendix 1. Amended para 7.6.7 to include LDF parking standards.</p>	<p>Factual change to reference to core strategy in LDF (which have undertaken SA). No significant change to brief required.</p>

The following table details the results of the consultation process where comments were specifically made on the Sustainability Appraisal document.

This details the comment made, any change or otherwise on the SA and the reason for this course of action.

Table 3.0: Consultation Results for the Sustainability Appraisal		
Comments on SA report by Environment Agency	Amendments to the SA taken	Explanation
<p>Topic: Biodiversity, Flora and Fauna (Lack of information considered here) There could be inclusion of land-use and habitat distribution maps for the study area if possible. Baseline should inventory known threats and pressures on important components of biodiversity within the study area such as:</p> <ul style="list-style-type: none"> -Invasion of non-native or overly dominant species -Habitat isolation and fragmentation -Key biodiversity interests and considerations, including the critical ecosystem -Identification of key problems for biodiversity 	None	<p>The comments are noted however given the size and use of the site and available information, it is considered appropriate for this level of detail to be undertaken with the detailed planning application.</p> <p>Section 7.1 (EIA assessment), Section 7.11 and 7.22 (environmental improvements) of the planning brief is expected to deliver a considerable amount of biodiversity information at the local level. It is also expected that these requirements will cover the issue of biodiversity, flora and fauna to a satisfactory level.</p>
<p>Topic: Water Sections of the borough have been identified as being at a significant risk of flooding, up to a 1 in 75 year occurrence. You should be using EA's flood zone maps as a measure to delineate areas at significant risk of flooding.</p>	None	<p>Mapping of flood risk zones has already been considered in the baseline study of SA of Porters Way. Figure 5 in the SA report shows the flood zones mapping for Southern Hillingdon, which includes the Porter Way site.</p>
<p>Change comment ' EA undertook a National Flood risk Assessment 2004'. It should be replaced with ' EA launched the use of new flood zone maps in July 2004, in accordance with PPG-25, which replaced the old Indicative flood plain map (IFM) as the main constraint map underpinning the new Standing Advice on Development and Flood Risk.</p>	Noted	<p>The relevant line has been amended in the SA report.</p>

<p>Topic-Indicators on Biodiversity Condition of SSSIs should not be the only indicator of biodiversity objectives. Other key indicators could be:</p> <ul style="list-style-type: none"> (i) % of developments incorporating Biodiversity Action Plan targets (ii) No. of applications with ecological gains (iii) No. of applications providing mitigation/compensation for environmental loss (iv) No. of applications resulting in a net loss to biodiversity 	<p>Noted</p>	<p>The comments are noted however Brief was prepared for one site so some indicators listed are not applicable. In the Brief, biodiversity and ecology has been highlighted as requiring further assessment including appropriate mitigation and monitoring. It should be noted that requirements regarding biodiversity, ecology, wildlife and habitat have been strengthened in the brief regardless. The comments with respect to the suggested indicators have been noted, which may be used for any future SA and can be used in the next Annual Monitoring Report of the Local Development Framework.</p>
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7. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with;

Three options were considered as part of the sustainability appraisal of the Porters Way Planning Brief. Option 3 was considered that it was most able to meet the sustainability objectives.

Option 1. Do Nothing.

Currently the subject site is a specialised employment site (sui generis) with ancillary offices and other uses for the former RAF West Drayton (Area A), and the National Air Traffic Services (Area B). Area C is the local parade of shops (A1/A2) and with flats (C3) above. The former RAF site is disused and awaiting redevelopment. The NATS site is likely to be vacated by 2008. The shops and flats and their environs would benefit from upgrading and improvements to security and surveillance.

A lack of regeneration initiatives is considered to be likely to exacerbate existing deprivation through the potential for detrimental impacts on residential amenity, air quality, traffic generation, local biodiversity values and local employment. This approach is unable to meet the SA environmental objectives.

Option 2 - Status Quo - Site-specific proposals concentrated in the Hayes / West Drayton Corridor.

Guidance for redevelopment for the subject site based on the general provisions of the 1998 UDP. Policy PR8 in the UDP refers to the existing RAF site and includes a small part of Area B. It recognises that the site is not suitable for industrial or warehousing activity due to impacts on residential amenity and requires consideration of any aviation facility that remains functional. Policy PR8 enables the 1994 RAF West Drayton, Porters Way Planning Brief. The 1994 Brief seeks a high quality residential scheme that reflects the area's general character, retains and utilises trees of merit and allows for future expansion onto Area B.

However the 1994 brief does not reflect all current planning and environmental policies at national, regional and local levels and provides guidance for mainly Area A. It does not reflect the need to consider the relationship, connections and implications between all three areas and the surrounds. The UDP provides general guidance for the remainder of the site but does not provide specific guidance for the regeneration of Area B and its surrounds. Without the promotion of a sustainable mixed-use community, existing environmental issues such as air quality would likely become worse. The continuance of this approach is unlikely encourage regeneration and to fully meet the environmental objectives.

Option 3 - Planning Brief for the whole of the Porters Way site

The Planning Brief for the whole of the Porters Way site provides guidance for the future land use and development of this site to achieve a sustainable mixed-use community in accordance with current planning policies at national, regional and local levels. It would facilitate integrated redevelopment of this brown field site and bring regeneration benefits to the wider community. This approach is the most consistent with the environmental objectives of the sustainability appraisal

8. The measures that are to be taken to monitor the significant sustainable issues of the implementation of the plan or programme

The significant issues discussed above, and given in detail in the Sustainability Report, will be monitored as part of the Local Development Framework Annual Monitoring Report (AMR). The AMR includes monitoring of sustainability criteria including those indicators listed in section 7.2 of the Sustainability Appraisal Report of the draft Porters Way Planning Brief.