

Porters Way Planning Brief Supplementary Planning Document

ADOPTION STATEMENT

The Porters Way Planning Brief Supplementary Planning Document was adopted by the London Borough of Hillingdon's Central and South Planning Committee on 22nd December 2005 to provide supplementary planning guidance for the purposes of development control.

It has been prepared to provide guidance for the future land use and development of the former RAF West Drayton site (Area A), the National Air Traffic Services (NATS) site (Area B) and a local parade of shops and flats (Area C) to achieve a sustainable mixed-use community and to consider the long-term comprehensive redevelopment of all three sites. It will assist in pre-application discussions and be a material consideration in determining planning applications for the subject site.

In accordance with Regulation 16(b) and 16(c) of the Town and Country Planning (Local Development) (England) Regulations 2004, any person aggrieved by this Supplementary Planning Document (SPD) may apply to the High Court for permission to apply for judicial review of the decision to adopt the SPD; and that any such application for leave must be made promptly and in any event not later than 3 months after the date on which the SPD was adopted.

Porters Way Planning Brief Supplementary Planning Document

Details of representations on the Porters Way Planning Brief Supplementary Planning Document

This statement sets out, in accordance with regulation 18 (4) (b) of the Town and Country Planning (Local Development) (England) Regulations 2004, the public participation and consultation process undertaken for the Porters Way Planning Brief SPD.

These matters were considered by the Central and South Planning Committee on 22nd December 2005.

1.0 Background

- 1.1 The Central and South Planning Committee at its meeting of 14th April 2005 requested that a planning brief be prepared to guide future redevelopment of the former RAF site and the adjoining National Air Traffic Control (NATS) site to address issues raised from two refused planning applications on the former RAF site in 2004 and early 2005.
- 1.2 Local residents from the Porters Way Development Group forwarded a list of considerations in the preparation of any draft brief. These issues included access, schools, amenities, emergency services, the need for a community centre, that the local community should be consulted, cycle ways should be provided, that density should be within keeping within the local areas, disabled housing should be provided, that the development should be energy efficient, health provision, inclusion of leisure sports/facilities, trees, no-high rise, nursery, play areas, mix of housing, older person's properties, shops and traffic.
- 1.3 These were considered in the preparation of the draft brief. The landowners of the subject sites were notified that the brief was being prepared. Where comments were made these were considered in the drafting of the document. Internal consultees in the various specialist areas of noise, policy and environmental planning, health, aviation, green spaces, footpaths, contaminated land, community resources, housing, air quality, education, secured by design, traffic and access, landscape and conservation were contacted and asked to provide comment. These were included in the draft document.
- 1.4 The Central and South Planning Committee agreed on 25 July 2005 to approve the Draft Planning Brief for Porters Way, West Drayton for public consultation with interested parties and that the results of the consultation be reported to a future meeting of the Committee.
- 1.5 A scoping report and sustainability appraisal was undertaken for the draft brief.

2.0 Consultation arrangements

2.1 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. This included (in accordance with the Statement of Community Involvement):

- Advertisement in local press on the 12th and 13th October (being the Uxbridge and West Drayton Gazette, Ruislip and Northwood Gazette, Hayes and Harlington Gazette, Uxbridge and Hillingdon Times and “Hillingdon People”) An advert was placed in the Talking Newspaper.
- Notification by letter to statutory authorities, stakeholders, organisations, community groups, schools and other interested parties (Consultees identified in Appendix 1).
- Notification on Council’s website with copies of the documents available for viewing.
- Placement of documents at all 17 Hillingdon libraries, Hayes One-Stop-Shop and the Civic Centre (Planning and Transportation Group reception). A CD-Rom with power point presentation and voiceovers in 7 different languages advertised through posters in 7 different languages in the libraries and Hayes One-Stop-Shop and regular adverts on local radio stations in English, Punjabi and Hindi
- Public events - road shows, workshops, forums and partnerships events. This included publicity and officer’s presence at Brunel University Careers Fair and Council’s Democracy Week, inclusion in the LDF Road Show (8 half days where officers were met the general public in the borough), three public meetings for the LDF at (Uxbridge, Ruislip and Hayes). Connecting Communities LDF discussion groups took place in Hayes and Uxbridge Civic Centre.

2.2 In addition, over 750 letters were sent to the homes of residents in the immediate vicinity of the Porters Way sites. 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. Letters were also sent to those individuals who

objected to the planning applications regarding the RAF Porters Way site.

- 2.3 The letters to these residents notified them of the Planning Brief and a 'drop-in' session on 2nd November from 4.00pm to 7.00pm at the Bell Farm Christian Centre Hall. This provided an opportunity for neighbouring residents to look at the draft Porters Way Planning Brief in a local setting, to discuss it with others and to make a written response, with Council officers being available to answer any questions that may arise. Copies of the draft Brief and LDF, together with LDF response sheets were available during the 'drop-in' session.
- 2.4 Officers also made a presentation to the Yiewsley and West Drayton Town Centre Action Group on 13 October 2005 and distributed copies of the planning brief and information sheets to those present.
- 2.5 Part of the legal requirements for producing Supplementary Planning Documents (SPD) is an accompanying sustainability appraisal. The sustainability appraisal has been consulted upon, at the same time as the Draft Planning Brief for Porters Way. Any comments with implications for the Brief have been taken account in the revisions. Comments received on the sustainability appraisal are addressed in an updated Sustainability Appraisal that takes into consideration the consultation responses received and the difference the process has made.

3.0 Comments received

- 3.1 Comments have been received from 5 organisations, 12 local residents, 1 local shopkeeper, the Bell Farm Residents Association, Broadway Malyan on behalf of St George West Ltd and GVA Grimley on behalf of Defence Estates. A response has also been received from John McDonnell MP on behalf of those attending a public meeting that he held on 7 November 2005.
- 3.2 The main issues raised during the public consultation on the Draft Planning Brief relate to traffic, parking, access, road safety, residential amenity, housing density, pollution, trees, landscaping, impacts on shops, safety, security and impacts on local facilities such as education, health, play space, youth facilities and open spaces.
- 3.3 The owners of the former RAF West Drayton and NATS sites raised concerns regarding the status of the Brief, the justification for higher density housing on the sites, the lack of justification for a mixed use scheme, the lack of justification to provide additional community facilities, including recreational facilities, the overly prescriptive nature of the brief, and the need for the sites to be developed independently of each other.

3.4 The representations made to Council and the response and /or changes made to the draft Brief is included at Appendix 2 in detail.

3.5 The draft Brief was reviewed in light of the feedback received during the consultation period and the following main changes were made:

Main Changes made to Brief	Specific point of objection addressed (details in appendix 2)
Retention of 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.	<ul style="list-style-type: none"> • Shops should be retained • New shops should be community focus • Shopkeepers should be given first refusal on shops, do they have a say in size of units. • Retain well established shops
To include the need for planning obligations to ensure satisfactory connection, upgrade and improvements to the shops at Area C	<ul style="list-style-type: none"> • Shops should be retained • New shops should be community focus
To emphasis the principle of a residential led mixed-use community with compatible and supporting uses.	<ul style="list-style-type: none"> • Address traffic, parking and access issues • Proposed density is too high with impacts on traffic & pollution • Housing will lead to more traffic • Provision of housing should be key objective. • Requirement for B1 should be omitted
To update the density requirements in the brief in light of the recently approved footpath to the north of the site – so that the Porters Way site is now to be considered having a PTAL of 1b – 2.	<ul style="list-style-type: none"> • Proposed density is too high with impacts on traffic & pollution • Amend brief to reflect provisions of SHAAP and GLA’s advice as urban and suitable for development.

<p>To emphasise sustainability to address air quality, biodiversity, noise and traffic.</p>	<ul style="list-style-type: none"> • Should be reference to sustainable transport • Re- order objectives to promote sustainability • Enhance natural environment for biodiversity • Proposed density is too high with impacts on traffic and pollution • Issues from construction
<p>To clarify that there may be more than one entrance to Porters Way</p>	<ul style="list-style-type: none"> • One access point to the site is not adequate • Brief fails to make distinction between areas A, B & C, sites should be able to be developed independently. • Brief suggests only one access point to Porters Way
<p>Updating the brief in relation to recent changes in Government policy and guidance as well as the LDF requirements.</p>	<ul style="list-style-type: none"> • Reference to updated Government Policies • Affordable housing provision • Reference to integrated transport strategy • Accessibility • Drainage

4.0 Sustainability appraisal

4.1 A Sustainability Appraisal (SA) formed part of the consultation process for the Planning Brief and its recommendations have been incorporated into the revised Brief. The SA identified that the principles of the planning brief were considered to be a key means of achieving European, National and London objectives for meeting housing targets, improving local services, higher quality of urban design, improved accessibility and long term environmental, economic and social upkeep of these areas for future generations to enjoy. A review of the SA indicated the following issues that required additional action in the brief to meet the sustainability objectives:

- Increase in traffic and negative effects from this including air quality
- Impacts on residents from poor air quality and noise
- Effects on wildlife & habitat.

4.2 These matters have been addressed in the revised brief by:

- Strengthening the requirement for sustainable development at all stages
 - Strengthening the need to consider sustainable transport and traffic impacts
 - Strengthening air quality and noise requirements in the brief
 - Reference to the biodiversity action plan in assessment and need to ensure the protection of significant wildlife on site.
- 4.3 The comments received during consultation are being addressed in an update to the Sustainability Appraisal that takes into consideration the responses received and the difference the process has made.

5.0 Outcome

- 5.1 In the light of the issues raised during the public consultation, and the guidance and policies in the 'Preferred Options' LDF documents that were approved by Cabinet, amendments were made to the Brief and it was adopted as a Supplementary Planning Document providing supplementary planning guidance for the purposes of development control by the Central and South Planning Committee on 22nd December 2005.

APPENDIX 1

Who was consulted on the draft Porters Way document ?

The Statement of Community Involvement identifies a number of consultees who were contacted as part of the LDF consultation process (which included the draft Brief and sustainability appraisal). These were:

<p>Specific consultation bodies as required by Planning Regulations (statutory)</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

	<ul style="list-style-type: none"> • General practitioners • Other health care 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 are relevant stakeholders.
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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

Letters were sent to residents in 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.

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.

APPENDIX 2

SUMMARY OF COMMENTS RECEIVED AND OFFICER RESPONSE

Summary of comments received	Response
<p><u>English Heritage</u></p> <p>Noted that there are no statutorily protected historic assets within the site or neighbouring its boundaries. No formal comments to make, however, suggest that the architectural and historic importance of the site and its buildings are fully assessed and that any features of local distinctiveness be, where possible, valued and incorporated into any future proposals for development.</p> <p>Suggest that reference should be made to the English Heritage/CABE publication <i>Guidance on Tall Buildings</i> (March 2003) regarding building scale and height under section 7.10.</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>Note the comments of English Heritage. High quality design is promoted through objective i in 5.0.1 and in section 7.8.</p> <p>Tall buildings are not proposed in the Brief. Guidance will be via the relevant government, UDP and LDF policies.</p> <p>Amend para 7.1.1 to require specific assessments including archaeology.</p>
<p><u>Highways Agency, Dorking, Surrey</u></p> <p>Section 2.0.1 – 2.0.7 and site specific location maps.</p> <p>Neither the local or national strategic trunk road network is noted in the site characteristics for areas A – D. Area D notes the proximity to public transport services. Careful consideration of likely travel patterns should be compulsory, as well as development of tailored demand management measures to reduce potential trunk road impacts. This could be achieved by balancing supply of housing and employment and avoiding the creation of additional demand for travel between home, work and other facilities. 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</p>	<p>Amend para 2.0.1. to note the road network.</p> <p>Amend para 7.6.4 to include the trunk road impacts. The Brief promotes sustainable development in objectives ii and v, in 5.0.1 and in section 7.2.</p>

combination with others.

Section 2.0.3 – 2.0.4, Area A and site-specific location maps.

Area A could have a material impact on the trunk road network, either in isolation or in combination with Site B in particular, unless carefully managed from the outset. The Highways Agency is keen to remain involved with the consultation process as details regarding the land use mix emerge or alter.

Section 2.0.5 – 2.0.6 Area B and site-specific location maps.

The mix of developments has not yet been specified and so it is not possible to undertake an initial analysis. However close proximity of the proposed site to M4 Junction 4 means that the proposals could have a material impact on the trunk road network when combined with site A.

The Highways Agency is keen to remain involved in the consultation process.

Section 2.0.6 - Area C and site 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.

Section 2.0.7 Area D and site specific location maps

the close location of the proposed site to the trunk road network is a cause of concern to the Highways Agency. The Highways Agency would like to be notified of any further details that emerge regarding this site.

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.

5.0.1 Development Objective xi, xii and xiii Support -The Highways Agency would be

The Highways Agency is consulted on applications where the development is likely to result in a material increase in the volume or change the character of traffic on a trunk road.

Amend para 7.6.4 to refer to an integrated transport strategy.

The Highways Agency is consulted on applications where the development is likely to result in a material increase in the volume or change the character of traffic on a trunk road.

Objective 5.0.1 xi refers to sustainable transport. Amend para 7.6.4 to include the trunk road impacts.

Welcome support.

supportive of initiatives that would improve sustainable transport provision in the Borough and therefore create opportunities to mitigate development impacts on the trunk road network.

5.0.1 Development Objective xv.

The HA requires further information about the redevelopment and relocation of the existing services for the provision of residential uses before any detailed comments can be made. The HA is keen to remain involved with the consultation process as and when further specific details are put forward.

Section 6.0.1

The HA notes the possible different land uses for Porters Way. The HA is keen to remain involved with the consultation process.

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.

Section 7.3.1 – 7.4.1

Support - The HA supports a balanced strategy to create a sustainable solution. However, should sites emerge that are residential extensions, the HA would be concerned that they may generate additional long-distance commuting trips. In this case, the already congested M4 corridor could suffer as a direct result if the issue is not tackled at all stages.

Section -7.6.1 – 7.6.7

Support - The HA notes that the area proposed for development has a low public transport accessibility score, but that the site should encourage opportunities for travel by modes other than the private car. To support this goal, the HA would therefore suggest that emerging policies should focus upon the minimisation of demand at source and the provision of alternative travel modes to provide opportunities for non car-based travel. Although the Highways Agency recognises that new transport hubs could be developed over

The Highways Agency is consulted on applications where the development is likely to result in a material increase in the volume or change the character of traffic on a trunk road.

Noted.

Amend para 7.2 to include all sustainability issues.
Amend para 7.6.4 to include the trunk road impacts.

Welcome support. Note concern that a large residential development may generate additional long-distance commuting trips and cause problems on the already congested M4 corridor.

Welcome support. Objective v in para 5.0.1 and para 7.3.2 promotes mixed uses on the site to reduce the need to travel. Para 7.6.4 relates to the need for a Transport Assessment and mitigation measures including a Travel Plan and improvements to public transport, footpaths and cycleways.

<p>time that would facilitate the use of non-car modes and provide opportunities to reduce the need to travel as well as the length of journeys, this process is likely to require very substantial investment and should be factored into the analysis at all stages of development planning, implementation and operation</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>Section 7.14.1 The Highways Agency would support the development of carefully sited community facilities that may have the potential to reduce the need to travel to larger urban areas.</p> <p>Section 7.22.1 The HA note that transport improvement will be made in accordance with the requirements of transport assessments. As previously noted, the HA recommends that sustainable transport should be considered as a proactive input to development, and as noted above the traffic impacts of the development are considered in relation to both the local roads and national trunk road network. As such, the HA should be included alongside the GLA and TfL as a consultee to the development process.</p>	<p>Amend para 7.6.4 to include the trunk road impacts.</p> <p>Welcome support.</p> <p>The Highways Agency is consulted on applications where the development is likely to result in a material increase in the volume or change the character of traffic on a trunk road.</p>
<p><u>Thames Water, Reading</u></p> <p>Pleased to note in para. 7.17.1 that applicants are advised to enter into early discussions with Thames Water</p> <p>Planning permission should be granted for drainage on 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>Welcome support.</p> <p>Amend para 7.17 to refer to funding requirements of Thames Water.</p>

<p>Responsibility of developer to make proper provision for ground, watercourse or surface water sewer.</p> <p>In disposal of surface water, the applicant is recommended to:</p> <p>Ensure new connections to public sewerage system do not pose an unacceptable threat of surcharge, flooding or pollution</p> <p>Proposals should be in line with DETR advice that encourages disposal on site without recourse to the public sewerage system.</p> <p>Foul and surface water should be separated on all new developments.</p> <p>Thames Water make reference to specific provision to certain provisions of PPS12 being:</p> <p>Paragraph 4.9 that outlines that LPA should ensure that housing and other strategic and regional requirements are not compromised by unrealistic expectations about future availability of infrastructure, transportations and resources.</p> <p>Paragraph B3 to B8. The capacity of existing infrastructure and the need for additional facilities should be taken in to account in the preparation of all local development documents (including water supply and sewers, waste facilities).</p> <p>Thames Water makes other comments about the need for realistic consultation periods in the preparation of LDDs.</p>	<p>Amend para 7.18 to refer to proper provision for surface water drainage.</p> <p>This is already recognised in the Brief in paras 7.17 to 7.19.</p> <p>Noted.</p>
<p><u>British Waterways - London</u></p> <p>No comments to make on the Porters Way Planning Brief due to the separation and screening of the site from the Grand Union Canal by the railway line.</p>	<p>Noted.</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</p>	<p>Amend para 4.0.2 to include the relevant government guidance.</p>

<p>Development and PPS 22: Renewable Energy.</p> <p>Support Section 5 objective i).</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 for maintaining, enhancing, restoring and adding to biodiversity interests across the whole area.</p> <p>We would also like to see an objective that relates to the successful remediation of contaminated land before any development is commenced.</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 paragraphs 7.11.1 to 7.11.3.</p> <p>Support section 7.17: Water and Waste Water (p41)</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). Any proposals for development over 1 ha should be</p>	<p>Welcome support.</p> <p>Amend para 5.0.1 to re-order objectives i and ii. Amend wording of objective ii.</p> <p>Amend objective vi in 5.0.1 to include provision for the enhancement of the natural environment for biodiversity.</p> <p>Remediation of contaminated land is already recognised in the Brief in para 7.20.4. This is not considered to be a key development objective.</p> <p>Amend para 7.8.3 to refer to measures to enhance the natural environment for biodiversity.</p> <p>Welcome support.</p> <p>Welcome support.</p> <p>Welcome support. Amend para 7.18.1 to refer to surface water flood risk and requirements of PPG 25.</p>
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<p>accompanied by a Surface Water Flood Risk Assessment, in accordance with PPG 25.</p> <p>The EC Water Framework Directive should also be mentioned under this consideration, as this is a major opportunity to improve the whole water environment and promote the sustainable use of water for the benefit of people and wildlife alike.</p> <p>Support section 7.19 Waste Management (p 41). 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>Detailed comments regarding the Sustainability Appraisal i.e. baseline information required for biodiversity; new flood zone maps were launched in July 2004; and biodiversity is not restricted to designated sites.</p>	<p>Flood mitigation, PPG25 and the sustainable use of water are already referred to in paras 7.8.1, 7.8.7 and 7.18.1</p> <p>Welcome support. Amend para 7.20.4 to refer to the Environment Agency's Contaminated Land Report 11.</p> <p>Comments regarding the sustainability appraisal are discussed in the main report. Biodiversity provisions are strengthened in the Brief.</p>
<p><u>Summary of objections by 12 local residents</u></p> <p>1) <u>Traffic, parking and vehicular access.</u></p> <p><u>Increase in traffic generated by the proposal and associated impacts on the surrounding roads.</u> Concerns that Porters Way and surrounding road network will not be able to take the additional traffic. Large volumes of traffic on Porters Way and Lavender Rise during rush hour. Traffic & access problems on Station Rd, Lavender Rise waiting to get to Stockely Road. Problems using North Road, Bell Avenue, bottleneck at Stockley Road. Vehicles also use North and South Road as a short cut. Stockley by-pass cannot cope with the amount of traffic and pollution.</p> <p><u>Proposal will cause parking and access problems elsewhere in the borough,</u> as residents will drive to nearest public transport. How is site's public transport rating to be improved? Access roads into the estate will become "rat runs". There should be</p>	<p>The Brief aims to minimise the adverse impacts of any increase in traffic by restricting the density of residential development on the sites; promoting a mixed-use development to reduce the need to travel; encouraging sustainable means of travel; and ensuring that mitigation measures are provided. A transport assessment will be required for any proposal.</p> <p>Para 7.6.4 of the Brief requires a Transport Assessment to accompany any major proposal to ensure that all transport impacts are</p>

<p>provisions made for the extra traffic (i.e. additional roads).</p> <p><u>Concerns that access proposed to the site will not be adequate.</u> There should be additional entrance/exit areas. One resident raised the idea of another access from the site over railway & canal into Horton Road.</p> <p><u>Safety for locals and school children from the development 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><u>Impacts on residential amenity</u> - if streets have to be widened to improve flow, there may be loss of verges and greens. There will be increase in pollution from increased traffic on Porters Way and surrounding area.</p> <p><u>Parking</u> needs to be ample.</p> <p><u>2) 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><u>3) Density</u> There is not the structure, transport, roads or schools or health to support huge growth. 860 units are too many for this site; there will be</p>	<p>fully addressed.</p> <p>Para 7.6.4 states that safe and satisfactory accesses should be provided off Porters Way. Pedestrian access already exists over the railway. Vehicular access over the railway may create more rather than less traffic issues in the area.</p> <p>Amend para 7.6.4 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>Loss of planting is already referred to in para 7.11.1. Air quality is referred to in paras 7.15.1 to 7.15.3.</p> <p>Car parking will be in accordance with Council's parking standards and parking standards are referred to in para 7.6.7.</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. Insert new para. 7.8.10 to refer to the above policy documents.</p> <p>The Brief aims to achieve a balance between maximizing the use of scarce land to provide additional housing for</p>
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2500 people. Can they be rehoused if they lose homes or have children? Council tax is already high enough
Density is too high. This would be a huge impact on facilities in this area such as schools, GPs, dentists & social. Traffic is already dense in Porters Way and Mulberry Crescent. The welfare of the community would be affected; more vehicles would impact on safety and add to pollution. Feel that the density in draft plan should be considerably reduced.
Would like to see no more than 400 units only
Any new development should be kept within population percentages & within common surroundings.
A maximum number of units must be agreed and procedures put in place to ensure this is not breached.

4) Education

Like to see education and community facilities on site

With this many houses the schools will not be able to cope. Local schools are already too big/too full and expansion is not acceptable. Will local children able to be guaranteed a place at nursery and at school? Classroom sizes are too big. Local schools (West Drayton Primary, Cherry Lane and others) are already under achieving and making them bigger is not the answer. There have been no new schools for a long time.

There needs to be additional schools in immediate area or close surrounding area to accommodate the extra students.

Schools are a problem; four will be closed when third runway goes ahead. Would like another primary/secondary school considered.

London (as set out in London Plan Policy 3A.2) and providing new development which is self-sustaining and does not adversely affect the character of the area, the local highways network or air quality. Note: that planning application ref. 5107/APP/2005/2082, that was refused planning permission on 25 October 2005, relates to 574 residential units on site A (4.52 ha). This application does not include site B which comprises 12.72ha. Where provision has not been provided on site, planning obligations will be required to address the impacts on local facilities such as schools, GPs, affordable and key worker housing, transport, leisure/open space, training, police and community facilities.

Para 7.22.1 of the Brief requires on-site provision of a community facility. Para 7.22.1 also states that some additional nursery facilities will most likely be required on-site and that contributions will be required towards primary and secondary facilities in the area.

It is not considered appropriate to consider the potential third runway in the Brief. Contributions will be required towards primary and secondary facilities in the area.

5) Health

A health centre on site is a must and to include clinic and GP facilities. Existing facilities are not coping with the existing population. Writer is very concerned that over already stretched health and school facilities will not be able to cope with increased population.

Area cannot support growth without additional of doctors, social services. Residents find it difficult of get same day appointments, for example, writers has to travel to Hayes for dentist. Ten day wait to see local doctor at surgery. Local dental surgery will not cope with providing cover.

6) Address pollution

Area already experiences extreme pollution. Worst air pollution in country. Writer feels that adding pollution to an area that already has the highest pollution in the country to be totally unacceptable. Pollution, traffic and noise are major considerations as residents are at capacity with motorway and airport nearby.

Construction will cause problems for local residents from lorries, noise, dust, dirt and traffic implications on local roads and in West Drayton High Street.

7) Retention of local amenity and environment

The tree line along Porters Way should not be changed (i.e. for road works).

8) Play space

There should be play areas for older children
Needs playgrounds for the children to improve area.

9) Impacts from live/work units

Para 7.22.1 of the Brief requires contributions towards health facilities in the area. It also acknowledges that, taking into account the development sites at Porters Way and other likely developments within a 2 mile radius, that it is possible that a new doctors practice may be required on site.

Para 7.15.1 acknowledges pollution levels in the area and para 7.15.3 requires that proposals incorporate measures to minimise air quality impacts.

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. Amend para 7.6.3 to include measures for pedestrian safety during construction works.

Para 7.11.1 of the Brief proposes retention of the tree line along Porters Way.

Para 7.11.1 of the Brief requires provision of on-site recreational facilities for older 'youths' and para 7.22.1 regarding planning obligations includes a requirement for on-site leisure and recreational facilities to be maintained by the developer.

'Live work' units enable

There will be issues from extra vehicles coming and going.

10) Shops

Shops should be retained. Do they need to be pulled down? They should be left alone. If the charges were lowered they (the shops) would make money out it.

New shops to be a community focus. 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.

Would like to see local entrance to shops (on site)

The new shops to open on Mulberry Parade should be opened before the old ones are demolished.

11) Community facilities

More youth facilities are needed. Very thin with youth facilities in the local area, this should be addressed. Increase in young people turning to crime is in part due to boredom. Development must become part of local community with no resentment from new residents or existing. Needs to be community centre, doctors, and school considered.

Would to see leisure centre including pool on site
Would be nice to have more things for people who already live there. Places for youngsters to go, don't need any more jobs. Part of site could be turned into leisure complex including shops being redeveloped and health facilities.

people to work from home and generally result in less traffic generation.

Amend 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.

Para 7.22.1 of the Brief requires on-site provision of a community facility. Para 7.22.1 also states that some additional nursery facilities will most likely be required on-site and that contributions will be required towards primary and secondary facilities in the area.

Para 7.22.1 of the Brief requires contributions towards health facilities in the area. It also acknowledges that, taking into account the development sites at Porters Way and other likely developments within a 2 mile radius, that it is possible that a new doctors practice may be required on site. Yiewsley Pool is about 2100m from the site and it is not considered appropriate to require a pool on site.

<p>12) <u>Inadequate affordable housing provision</u> Needs to be a good amount of affordable housing of all sizes, 25% is not enough!</p> <p>13) <u>Safety and security</u> <u>Need more police.</u> Run down neglected area, just got more police & community officers deal with that amount of people going to need more police not support officers.</p> <p><u>Ensure anti-social behaviour is addressed.</u> Experience a lot of anti-social behaviour in already overpopulated area. Anti-social behaviour must be considered in design of pedestrian and play areas. Concerned for community safety a night and do not wish to encourage any unruly behaviour.</p> <p>14) <u>Cohesive community</u> Needs to be integrated into local community and not be a gated community.</p> <p>Appreciate that the site needs developing and local authority needs new housing. New development should be closely examined and before accepting any proposal the Council ensures all guidelines are adhered to. Investment should be made to sustain the development, by support in local police, youth workers, health, education and substantially improving transport links and roadways. Not opposed to more housing but more thought should be given to those that live here and making sure that there is enough facilities to cope with new homes. New home should be built so they fit into the area. The whole site should be developed for the benefit and health of the community.</p>	<p>The level of affordable housing required is set out in para 7.4.5 (i.e. at least 35%, including 10% intermediate housing). The Brief, in para 7.4.5 already promotes a mix of housing sizes.</p> <p>The level of policing is not a planning issue.</p> <p>The Brief addresses community safety issues in para 7.12.1. It requires that proposals should meet the requirements of Secured by Design and the Council's Supplementary Guidance on Community Safety by Design.</p> <p>The Brief promotes sustainable development in objectives i (formerly objective ii) and v, in 5.0.1. Objective iv requires that the development should reflect the area's general character. Objective xii requires improved pedestrian and cycle access to and from the site.</p> <p>The Brief aims to do this by providing guidance for the development of the site. Paras 5.0.1 and 7.22.1 address the need for supporting services and facilities to be provided.</p>
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15) Oppose housing on site

Should build schools, health centres, sports and leisure places on this site instead of housing to improve the area.

Not happy about having housing estate near Holly Gardens - will lower the tone of area and impact on house prices

16) Proposed footpath to north west of Area A (planning application)

Not happy about a footpath running up the side of the house – it will cause antisocial behaviour such as drinking, drug taking and graffiti and homes and cars being broken into. Lived on estate previously where problems with car stealing, burning and lack of policing.

17) Consultation

Was only informed about the consultation on 7th November (2 days before it ends) at a meeting with our local MP. Why were local residents not informed by Council about the consultation period? Totally unacceptable from the council.

The site is in private ownership and there are no valid planning reasons against the principle of a residential-led scheme on the sites.

Planning obligations will be sought in accordance with current planning policies and government guidance to mitigate against any adverse impacts arising from the development.

Such financial considerations are not valid planning matters.

Planning application ref. 60967/APP/2005/2791 for a footpath to Holly Gardens was approved on 28 November 2005.

The Porters Way Planning Brief was included in the wider Local Development Framework (LDF) consultation and in accordance with the Statement of Community Involvement. The consultation arrangements included an advertisement in local press; notification by letter to statutory authorities, stakeholders, organisations, community groups, schools and other interested parties; documents available at libraries; notification on the Council's website with copies of the documents available. In addition, over 750 letters were sent in October to

<p>18) <u>Impacts from proposed third runway</u> Already have third runway hanging over their heads which will make live unbearable only option for many other home owning taxpayer is to move out of West Drayton</p>	<p>residents in the immediate vicinity of the Porters Way sites regarding the draft Brief and a 'drop-in' session at the Bell Farm Christian Centre on 2nd November 2005. Letters were also sent to those individuals who objected to the planning applications regarding the RAF Porters Way site.</p> <p>Note the concern. It is not considered appropriate to consider the potential third runway in the Brief. The Council will continue to respond to proposals at Heathrow as matters arise.</p>
<p><u>Chairman Bell Farm Residents Association, West Drayton</u></p> <p>Concern about consultation process. Any development of the RAF site will have a detrimental effect on estate.</p> <p>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>The site is in private ownership and there are no valid planning reasons against the principle of a residential-led scheme on the sites. See comments under 17 above.</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. Amend para 7.6.4 to include measures for pedestrian safety during construction works.</p> <p>The Brief aims to minimise the adverse impacts of any increase in traffic by restricting the density of residential development on the sites; promoting a mixed-use development to reduce the need to travel; encouraging sustainable means of travel; and ensuring</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>What will the proposed health, educational and community facilities be? Ideally need a full health centre with dentist.</p> <p>The majority of local primary schools are full and should not be expanded more. Is a school planned? Secondary education would also be a problem, as we have no local secondary schools. If the third runway gets planning permission, at least 2 of our 4 primary schools will close, where will the children go then?</p> <p>Can you confirm what is planned for community facilities? Any building of this kind must be open to the whole community, not just one part of it.</p> <p>Query half space requirement, parking between 1.5 and 2 parking spaces per housing unit.</p>	<p>that mitigation measures are provided.</p> <p>See comments at local residents objection 10 above to retain the shops on site C.</p> <p>See comments at local residents objection 10 above (to retain the shops on site C). 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>See comments at local residents objections 4, 5 and 11 above</p> <p>See comments at local residents objection 4-above</p> <p>Para 7.22.1 in the Brief requires a new general community building suitable for use by small groups within the community. A minimum size of 350 sq m is specified.</p> <p>Para 7.6.7 in the Brief refers to the Council's car parking standard, which specifies 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</p>
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<p>Any development of this site will have detrimental effect by increasing the already over-used community facilities, shops and roads. Need to consider residents who already live in the area.</p>	<p>Appendix 1 Parking Standards and London Plan Parking Standards.</p> <p>See comments at local residents objection 15 above.</p>
<p><u>John McDonnell MP on behalf of attendees at a public meeting</u></p> <p>Convened a meeting of local residents to consult them on the draft planning brief. Key point raised were:</p> <p>Concern over lack of consultation; concern this has not complied with standards and procedures and with Council's community consultation guidelines</p> <p>Lack of clarity on amount of units onsite and, call for maximum number to be set, including a clear limit on different sizes and types of units</p> <p>Proposed housing density is too high with concerns at the impact 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>Concern over how pupil numbers are to be accommodated and how s106 monies secured for education purposes would be used. Query feasibility of assessment studies.</p> <p>Essential health facilities e.g. doctors surgery needed on site i.e. full medical centre.</p> <p>Fears that density of housing would lead to more traffic on local roads than can sustain. Local residents not convinced that mitigation measures</p>	<p>See comments at local residents objection 17 above</p> <p>Para 7.5.2 in the Brief sets out density guidelines, taking account of London Plan policies. The Brief included the maximum number of units for each of the three sites based on a number of assumptions. Para 7.4.5 refers to the housing mix requirements and para 7.4.8 includes floor space standards for the various house types.</p> <p>See comments at local residents objection 4 above.</p> <p>See comments at local residents objection 10 above (to retain the shops on site C)</p> <p>See comments at local residents objection 4 above.</p> <p>See comments at local residents objection 5 above.</p> <p>See comments at local residents objection 1 above.</p>

<p>would be effective.</p> <p>Community safety by design should be integral to any future development scheme</p> <p>Not viable to have just one entrance in and out of the proposed site.</p> <p>Emphasis on environmental measures for recycling, waste minimisation and energy conservation.</p> <p>Design and layout proposals should be consistent with local area (e.g. lawns, green verges)</p> <p>Leaseholders at Mulberry Parade expressed concern with lack of consultation with them.</p> <p>Concerns with lack of consideration of road safety and detailed proposals were called for to tackle road safety implications.</p>	<p>See comments at local residents objection 13 above.</p> <p>See comments at local residents objection 10 above (to retain the shops on site C). 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>The Brief promotes sustainable development in objective i (formerly objective ii) in 5.0.1. These issues are also included in the Brief at paras 7.2, 7.17, 7.18 and 7.19.</p> <p>Objective iv requires that the development should reflect the area's general character. Loss of planting is already referred to in para 7.11.1.</p> <p>See comments at local residents objection 17 on public consultation above.</p> <p>See comments at local residents objection 1 above.</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>Have brought to attention of Councillors/Planning</p>	<p>See comments at local residents objection 17 above.</p> <p>See comments at local residents objection 10 above.</p> <p>See comments at local</p>

<p>Officers the importance of extra provisions for education and health.</p>	<p>residents objections 4 and 5 above</p>
<p><u>Broadway Malyan. Representations made on behalf of St George West LTD (SGWL) (RAF site).</u></p> <p>Concerns raised regarding the procedure for the preparation of the brief. The brief is being prepared in advance of its parent statutory policies.</p> <p>The brief fails to acknowledge the status of the site as falling within the North Heathrow Opportunity Areas as identified in the GLA's draft Sub Regional Development Framework for West London. It is therefore incomplete in setting out the relevant policy context. Fails to demonstrate that it would be able to deliver the objectives of the DSRDF in terms of increasing densities.</p> <p>Draft brief fails to make a proper distinction between areas A, B & C & the impact of multiple ownership of site. Consider Area A already allocated for residential development. Brief should acknowledge that Area A can be developed at an early date & development has already been substantially agreed between Council & applicants. Request separate proposals for Area A. Brief should set out requirements for each area separately to reflect different requirements and planning status. Essential that each area can be brought forward of others in isolation.</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</p>	<p>The Brief has been undertaken in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004 and the guidance set out in Planning Policy Statement 12: Local Development Frameworks.</p> <p>The Brief complies with the London Plan and the Hillingdon LDF Southern Hillingdon Area Action Plan (SHAAP) Preferred Options DPD. The SHAAP takes full account of the Opportunity Areas identified by the GLA. Amend para 4.0.3 to include reference to the GLA's draft Sub Regional Development Framework for West London</p> <p>The Brief recognises that the areas are distinct and considers it necessary to encourage comprehensive development of the sites, due to their size, characteristics and relationships to each other and the surrounding areas. The Brief does not preclude one area being developed prior to another, provided that full account is taken of future development of adjoining sites.</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</p>

<p>independent examination. The brief is overly prescriptive, with specific standards being stipulated, part of document will become out of date as standards change. Developer has reduced scope to deliver innovative design & housing & the Brief will constrain development.</p> <p>Specific points objected to:</p> <p>Para 4.0.1 - adopted brief does not relate only to the appeal site of site for UDP Policy PR8</p> <p>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 7.4.6 - Not consistent with Hillingdon Housing Needs Update. Brief should contribute to providing need for affordable housing not priority affordable housing need borough wide</p> <p>Para 7.4.7 -request reference to mix of tenure in each perimeter block be deleted</p> <p>Para 7.4.8 - floor space requirement are unnecessarily prescriptive and do not indicate whether these are based on internal or external measures</p>	<p>PPS1: Delivering Sustainable Development. It is consistent with the adopted UDP, the LDF Preferred Options documents, the London Plan and national policies. Amend objective v in para 5.0.1 to reflect the primary residential use of the sites.</p> <p>Amend para 4.0.1 to reflect that the Brief includes the north-eastern part of Site B.</p> <p>Part of Area B is covered by UDP Policy PR8.</p> <p>See comments at local residents objection 10-above (to retain the shops on site C). 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>The draft Brief is considered to be consistent with the Hillingdon Housing Needs Survey Update.</p> <p>Delete reference to 'each perimeter block' in former para 7.4.7 (new para 7.4.12) and include reference to dispersal in small groups.</p> <p>The minimum floorspace standards in former para 7.4.8 (new para 7.4.13) are considered necessary, to ensure provision of satisfactory indoor living space, to create good environmental conditions within new schemes. The standards therefore relate to internal usable space. Add reference to this in the Table.</p>
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Para 7.5.1 - question whether developments of only 150 hrh density would be of a quality producing good environmental conditions and harmonising with surroundings. Overemphasis in measuring proposed density against current density. Contradicts intention of para 16 of DSRDF that there will increase in densities in appropriate locations. Presupposes that the existing quality of the area should justify special protection.

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.

Para 7.5.8 - clarify statement that the use of Area A solely for residential use is unacceptable – this was not the case for planning application 5107/APP/2005/2082. Residential development of site A is established by the UDP and the brief should not change this unless a revised allocation policy has been adopted through the LDF.

Para 7.6.6 - dispute the provision of a road link to Area B

It should be noted that Housing Corporation standards have been referenced in para 7.4.13.

Para 7.5.1 states what is included in the adopted UDP policy H6. Para 7.5.2 refers to density guidelines in the London Plan. It is considered appropriate to include density guidelines in the Brief. The impacts of developments on the character of an area, the local highways network and other factors such as air quality are considered relevant considerations with regard to the density.

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.

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. A solely residential scheme on site A is likely to result in a requirement for a greater proportion of

<p>Para 7.6.7 – Unreasonable to express parking standards as they make no reference to mitigation measures, e.g. green travel plans</p> <p>Para 7.7.1 - Crossrail – this will be increased accessibility to the areas and opportunities for new and intensive developments.</p> <p>Para 7.8.4 - approach fails to deliver best use of brownfield land. Existing built form is well established; to expect the scale to be reduced is unrealistic. Approach to affordable housing provision in application 5107/APP/2005/2082 is considered acceptable and should be acknowledged. Support the principle of mixed tenure communities where affordable housing is well integrated with the overall development.</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 single access point has not been demonstrated. Fails to recognise issues of multiple ownership.</p> <p>Para 7.10.1 – proposed 2 –3 storey height fails to take account of existing built form & redevelopment potential. Fails to take account of national & strategic guidance.</p> <p>Para 7.13.3 – dispute this as recent planning report accepted loss of recreation ground that has never</p>	<p>community facilities and employment generating uses on site B.</p> <p>It is considered appropriate to include the Council’s parking standards in a planning brief.</p> <p>The Crossrail proposals have not been finalised and there is no formally agreed timetable for implementation.</p> <p>The Brief aims to achieve a balance between maximising the use of scarce land to provide additional housing for London (as set out in London Plan Policy 3A.2) and providing new development which is self-sustaining and does not adversely affect the character of the area, the local highways network or air quality.</p> <p>See comments at local residents objection 10-above (to retain the shops on site C). 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>The existing built form of site A is non residential. Given the suburban character of the surrounding area, the local transport network and other local infrastructure, it is considered that 2-3 storey buildings would accommodate the most appropriate scale of residential development for the site.</p> <p>The pitch facilities in the area are at capacity. The most</p>
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<p>been made available to public.</p> <p>Para 7.14 – fails to acknowledge planning application report in October 2005 that accepted the principle and scale of a community building size on area A. The brief should allow creation of community facilities with aggregate floor space across the total area.</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>Section 7.22 – open space provision contribution instead of on-site should be accepted for Area A.</p>	<p>appropriate way of providing additional pitch capacity for the development of the Porters way sites would be on-site.</p> <p>Community facilities for the Porters way sites should be provided in a way that facilitates expansion to accommodate the needs of residents from future residential development of the NATS site. They should also be located in association with other community facilities and/or services.</p> <p>Some areas of the Porters Way sites are within 400m of the recreation ground near Mulberry Parade but not all and access will involve children crossing Porters Way. Amend para 7.13.1.</p> <p>Amend para 7.15.3 to refer to sustainable travel measures and delete reference to air quality.</p> <p>Given that sites A and B amount to over 17 ha, it is considered that satisfactory on-site provision should be made for open space. Any financial contribution in lieu of on-site provision should be of sufficient scale to compensate for the full provision of such facilities on site B.</p>
<p><u>Defence Estates (NATS site), submitted by GVA Grimley.</u></p> <p>DE supports the preparation of a Planning Brief to</p>	<p>Welcome general support.</p>

guide the future redevelopment of the NATS site as part of a wider redevelopment area on Porters Way. However, DE recommends that LBH amend the Planning Brief to take account of the following comments to ensure that the most effective and efficient use is made of this area. Summarized the objections are:

Land ownership – (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.

Residential uses – (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.

Residential Density – (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 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).

Retail and Community uses – (policies 5.0.1 (v), 5.0.1 (ix), 5.0.1 (xv), 6.0.1, 7.3.3-4, 7.14) brief

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.

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.

Amend objective v in para 5.0.1 to reflect the primary residential use of the sites.

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 reconsidered for some parts of the site for a PTAL level of 2, subject to the recently approved permission for the footpath being implemented.

Amend objectives in para ix and xv in par 5.0.1 to retain

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 re-provision 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.

Employment - (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.

Open space – (policies 5.0.1 (vi), 5.0.1(vii), 7.13.3-6) Delete requirement for sports pitch as not considered appropriate. Do not object to open space appropriate to development. LBH exceeds the NPFA 6-acre standards, appears NATS site is well served by playing fields/recreation grounds sufficient to cater for future population increase from the development. DE note no existing playing field in NATS site, would not represent optimum use of previously developed land to turn hard standing in to sports pitch.

Car Parking Standards – (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

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.

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. Amend objective v in para 5.0.1 to reflect the primary residential use of the sites.

The playing fields identified by objectors are at 1km or more from the site and considered to be an unacceptable distance to meet the demand from this site. The recreation area opposite Mulberry Parade cannot meet the demands that would arise from sites A and B. Whilst there is no existing pitch on site B, it should be noted that a demand for open space, including pitch facilities, will be generated by the change in use of the site to residential use.

Since the draft Brief was published, parking standards have been reviewed in the LDF 'Preferred Options' Core

date in relation to national and London-wide guidance.

Building scale & height – (policy 5.0.1 (xiv), 7.6.7) should be removal of limit of 2-3 stories. Appropriate height/scale should be established through urban design/visual analysis assessment, undertaken as part of master plan, bearing in mind main NATS building is five commercial stories.

Strategy Appendix 1. Amend para 7.6.7 to include LDF parking standards.

The existing built form of site B is non residential and gated off with security access only. The buildings do not contribute to the local amenity of the area. Given the suburban character of the surrounding area, the local transport network and other local infrastructure, it is considered that 2-3 storey buildings would accommodate the most appropriate scale of residential development for the site.