

SUMMARY OF RESPONSES TO THE CONSULTATION ON THE DRAFT SUPPLEMENTARY PLANNING DOCUMENT FOR THE FORMER NATIONAL AIR TRAFFIC SERVICES (NATS) SITE, PORTERS WAY, WEST DRAYTON.

Summary of comments received	Officer Response
<p>1. <u>Greater London Authority (GLA)</u></p> <p>1.1 For the most part, the document has a strong design section which should result in a high quality future redevelopment of the site. However, there are a few points within this section of the SPD which are questioned.</p> <p>1.2 In the first instance, paragraph 3.19 introduces the desire for home zones. The provision of home zones is not opposed, however, within London some of the most successful residential environments are those with traditional streets. Within these streets residential buildings have a clear/strong relationship with the street frontage and the street pattern is simple and easily navigable for vehicles, pedestrians and cyclists. The creation of home zones can also be successful but, as highlighted within the SPD, they can be difficult for people with disabilities, particularly those with visual impairments. If the concept of home zones is to be pursued it is suggested that the SPD highlight that the rationale for the home zone concept must be addressed within the future design code/s. The SPD should also provide guidance as to the expectations in terms of layout, materials and provision of parking etc.</p> <p>1.3 The public open space section of the report should seek specific provision of children's play space for children of various ages and include guidance that specifies that such spaces should benefit from active and passive supervision and be well placed to serve residents. For a site of this size, a range of spaces will be required. Reference should be made to the Mayor's Supplementary Planning Guidance 'Providing for Children and Young People's Plan and Informal Recreation'. The Mayor's guidance includes details on the amount of children's playspace required, which equates to 10 sq.m per child.</p> <p>1.4 The provision of employment uses adjacent to the railway lines is supported in that, it will provide a buffer between the noise of the railway lines and the residential properties, however, the provision of a vegetated buffer adjacent to the railway is also supported in line with London Plan policies that seek to improve opportunities for wildlife and conservation.</p> <p>1.5 Additionally, it is understood that a culverted watercourse may run through the site. London Plan policy</p>	<p>Noted.</p> <p>The SPD has been amended in para 3.18 to ensure the homezone concept is carried forward but not at the expense of good urban design outcomes or creating a sense of place for the new development.</p> <p>Para 3.25 of the draft SPD already refers to provision of children's play space, and already includes specific reference to the Mayor's guidance and the requirements for children's play spaces.</p> <p>Noted</p> <p>The SPD has been amended at para 5.13 to include specific</p>

<p>4C.3 'The natural value of the Blue Ribbon Network' seeks opportunities to open culverts and naturalise river channels. This potential opportunity should be further investigated.</p> <p>1.6 While desired public routes through the site are included in the text of the document, it would be useful to see these in diagrammatic form. Additionally, any opportunities to improve pedestrian and cycle links to the north or to improve existing bridge facilities over the Grand union Canal or towpath should be considered.</p> <p>1.7 The SPD mentions the de-designation of the strip of land that is identified as an Industrial Business Park (IBP). It is important to note that this area is also identified as part of a Strategic Employment Location (SEL) within the London Plan. It is noted that the majority of the land within this designation is on the northern side of the railway tracks. However, the SEL designation offers a strong level of protection from redevelopment for uses that are not employment based and accordingly, the de-designation throughout the core strategy process should follow a robust process which includes both a qualitative and quantitative assessment of industrial land availability in the area and justifies the loss of this land. Until this process has been undertaken, there is the assumption that this SPD will still allow for the re-provision of employment space. Paragraph 4.1 goes some way to providing comfort that the employment space should be re-provided but at this stage, with the SEL and IBP designation still in place, the requirement for employment space should be more implicit and should be of an area of the same size as the existing designation.</p> <p>1.8 The redevelopment of the site for a residential-led scheme is supported, as is the inclusion of the existing small retail site at the east. The document (for example within in paragraph 2.10) seeks to improve these shops through the redevelopment process, which is welcomed. However, it would appear the desire is to retain and build upon this location for retail/community uses, while this is not specifically opposed, the wording of the document (e.g. xv on page 25) could be more flexible to allow for the possible future relocation of the retail uses to a more accessible site (better parking, more visible from the street) within the major development site. While the presence of the residential accommodation above the existing shops may make this more difficult, the opportunity/flexibility for better-placed local services should be provided.</p> <p>1.9 Based on previous planning decisions in the area and the London Plan density matrix (table 3A.2) of the London Plan, the residential density of 35 – 75 units per hectare is acceptable, however, further measures to improve the</p>	<p>reference to London Plan policy 4C.3, and requires the developer to investigate options to satisfy this policy.</p> <p>Map 5 in the draft SPD already includes these routes.</p> <p>The LBH Employment Land Study 2009 recommends that the site should de-designated as an IBA, but employment uses encouraged as part of a mixed use scheme through a site allocations policy. The reason for this recommendation is that <i>the site is unsuitable for most types of modern industrial and warehousing and waste handling uses due to its poor accessibility and proximity to a residential area. Some small scale business units as part of a mixed use scheme would provide local employment and help support a sustainable economy.</i></p> <p>Para 4.37 of the draft SPD states that the redevelopment creates the opportunity to enhance or relocate the existing shops.</p> <p>Noted. However, given the existing public transport network and existing suburban form of surrounding development, it is</p>
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<p>public transport accessibility level of the site will be required to justify the highest densities.</p> <p>1.10 Paragraph 4.10 includes the desired housing mix for the site. The fact studio housing is not included on this list is strongly supported. The provision of such a high level of family housing is also welcomed, including the provision of 5-bed units. Although, not identical too, the mix of units is broadly in accordance with the unit mix contained within the Mayor's Housing Supplementary Planning Guidance, which seeks a range of housing types.</p> <p>1.11 The inclusion of floor space standards within the document is welcomed, however, although the unit sizes are generally quite generous, the family sized units in particular could be improved. It is recommended that Hillingdon Council refer to table 4.1.1 of the draft London Housing Design Guide for further details on flat sizes. As studios are not promoted by the planning guidance, to avoid confusion, the reference to floor space standards for studios should be deleted from paragraph 4.13 and 4.15.</p> <p>1.12 In relation to affordable housing, the references to the appropriate policies of the London Plan is welcomed however, significant changes to paragraph 4.21 are sought. This paragraph states that there is a "high ratio of affordable housing already, the provision of a significantly high proportion of affordable housing on the site would not result in a balanced community, and would not be in the best interests of the existing and new residents". It goes on to refer that lower levels of affordable housing may be appropriate. The London Plan policy stance should be the starting point for establishing an appropriate level of affordable housing on the site. The wording of this proposed paragraph has the effect of creating an expectation that much lower levels of affordable housing will be accepted. It is important to recognise that the London Plan seeks a range of housing types, including a proportion of intermediate housing (within the affordable element) which would introduce a form of housing that is not currently well represented in the area. The London Plan approach, including the consideration of financial viability in the assessment of planning applications, provides a suitably flexible approach to affordable housing which will maximise the provision of affordable housing, without jeopardising the delivery of new homes. This approach should be adopted.</p> <p>1.13 Paragraph 4.18 should be rewritten to better reflect the priorities of inclusive design within the design of units and the design of spaces around the units. The scope of this paragraph is unnecessarily narrow and should instead incorporate a range of measures as listed within section 2.6 of the London Development Agency's 'Inclusive</p>	<p>unlikely that higher densities would be supported by the council or local residents.</p> <p>Agreed. The housing types required for development of the site will help to meet the identified housing need.</p> <p>The SPD has been amended in paras 4.13 and 4.15 to include specific reference to the floor space standards in the London Housing Design Guide.</p> <p>The draft SPD already outlines the London Plan approach in para 4.19 to 4.21. The specific circumstances of the site need to be recognised in the SPD. 89% of responses received from residents have raised concerns about the aim of achieving 50% affordable housing from the site, and this issue was consistently raised at meetings through the consultation process. Councils Housing Team have also stated that the requirement for 50% affordable housing (up to 400 homes) for that site would not lead to a balanced community, given the location and scale of development. The SPD needs to reflect current policy guidance, currently set by the London Plan 2008, however through the planning process it may be determined that providing 50% affordable housing will not viable for this site.</p> <p>Para 4.18 has been amended to specifically reference the guidance of the LDA's 'Inclusive Design Toolkit'.</p>
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<p>Design Toolkit’.</p> <p>1.14 The reference in the draft SPD that “some specialist housing may need to be exempt from the requirements to achieve lifetime homes as these will need to be designed to meet the particular needs of the potential resident” is somewhat confusing. If the reference to specialist housing is housing for the elderly, then it is even more important to achieve lifetime homes standards. This should also be reworded or deleted.</p> <p>1.15 As above, in relation to paragraph 4.28, Hillingdon Council should refer to the recently published draft London Housing Design Guide for details on flat sizes. The standards should be the same for all housing tenures.</p> <p>1.16 It should be noted that 10% of all new housing should be wheelchair accessible, not just the affordable housing.</p> <p>1.17 As you are aware all local development documents including supplementary planning documents have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. I consider that the document requires amendment before the document can be considered to be in general conformity with the London Plan. GLA officers are happy to discuss potential amendments to the document. Please send a copy of the adoption statement and the final SPD to this office in due course.</p>	<p>There will be circumstances where lifetime homes cannot be achieved for practical reasons or in achieving alternative standards that suit the specialist requirements, such as care homes. Para 4.18 has been amended to state that all developments will need to achieve full wheelchair accessibility standards.</p> <p>Para 4.27 has been amended to ensure the same standards are applied across different housing tenures, and to reference the London Housing Design Guide.</p> <p>Para 4.18 has been amended to require 10% of all housing to be fully wheelchair accessible.</p> <p>Further discussions with GLA officers have resolved the outstanding issues, and the SPD recommended for adoption is now in compliance with the London Plan.</p>
<p>2.0 <u>Transport for London (TfL)</u></p> <p>2.1 Overall, TfL welcomes the approach of the draft SPD and considers that the document is in general conformity with the London Plan. There are, however, some elements that need to be strengthened or expanded, and there are some suggestions for minor changes to the wording of a few sections. These points are outlined below:</p> <p>2.2 Paragraph 3.35- TfL welcomes the requirement for a travel plan framework to be developed for the site, and that a bond will accompany the travel plan, which can be drawn upon in the event that targets are not met.</p> <p>2.3 Paragraph 3.38- The SPD acknowledges that the principle of “homezones” can be problematic for people with disabilities, and TfL would continue to emphasise the importance of consultation with the relevant groups. This section should refer to London Plan policy 3C.18 Allocation of street space.</p>	<p>Noted.</p> <p>Noted.</p> <p>Para 3.38 has been amended to make reference to London Plan policy 3C.18.</p>

<p>2.4 Paragraph 3.39 - It should be noted that the capacity of transport networks has not yet been considered. A comprehensive assessment of the impacts on the transport networks will need to be undertaken and it is important to recognise that the outcome of this assessment may potentially influence the design, mix and scale of any development that can be delivered on site.</p> <p>2.5 Paragraph 3.40 - The list of planning obligations for public transport improvements could be expanded to have a more comprehensive list to include walking and cycling improvements.</p> <p>2.6 Paragraph 3.41- Car parking should be consistent with Annex 4 of the London Plan.</p> <p>2.7 Paragraph 3.42- It is recommended that the following text should be removed; “unless proven to be unviable”.</p> <p>2.8 Paragraph 3.43 - Whilst it is acknowledged that there should be a realistic approach to car parking in this outer London location, the level of car parking should be consistent with the London Plan and reflect highway capacity and seek to promote modal shift to public transport, walking and cycling as set out in London Plan policy 3C.3 Sustainable transport in London.</p> <p>2.9 Paragraph 3.41of the SPD states “any proposals for the site should aim to reduce reliance on the private motor vehicle in accordance with national and London Plan policy guidance.” TfL fully supports this and this approach should be applied consistently throughout the entire document.</p> <p>2.10 Paragraph 3.46 - Reference should be made to TfL’s Cycle parking standards as set out in London Plan Policy 3C.22: Improving conditions for cyclists.</p> <p>2.11 Paragraph 3.46 - The reference to Legible London as an opportunity to encourage more sustainable transport methods is a positive approach. However the wording is considered unsuitable and should be amended to read; “The way finding/ signage strategy should be developed in consultation with TfL. One strategy and mapping system should be consistently applied across the site and wide area of interest. In this way, principles of the Legible London way finding system can guide strategic development and simplify the pedestrian experience throughout London.”</p> <p>2.12 It should be noted that a construction logistics plan and delivery and servicing plan in accordance with the London Freight Plan will need to be included in any</p>	<p>Para 3.39 has been updated accordingly.</p> <p>Para 3.44 - 3.46 includes reference to walking and cycling. Para 3.40 has been amended to include reference to walking and cycling, and Para 6.2 further outlines these requirements.</p> <p>Para 3.41 is already consistent with the London Plan.</p> <p>Para 3.42 has been amended accordingly.</p> <p>Para 3.43 is already consistent with the London Plan.</p> <p>Noted.</p> <p>Para 3.46 now makes reference to TfL cycle parking standards.</p> <p>Para 3.46 has been reworded as suggested.</p> <p>Para 3.49 has been updated to include reference to the London Freight Plan.</p>
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<p>planning application.</p> <p>2.13 Should the SPD be adopted, the developer and their representatives are reminded that this does not discharge the requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.</p> <p>2.14 A formal TfL pre-application meeting has been held for the proposed redevelopment of this site and TfL will expect the issues raised at this meeting to be suitably addressed when a formal planning application is lodged.</p>	<p>Noted.</p> <p>Noted.</p>
<p>3.0 <u>Environment Agency</u></p> <p>3.1 We consider that the document adequately covers our areas of interest and has the correct level of detail.</p> <p>3.2 It is positive that sections 5.10 - 5.13 'Sustainable Drainage' has incorporated the requirement to achieve Greenfield runoff rates and to use the SUDS hierarchy. It should be mentioned in this section that infiltration techniques would need to be suitable for the site conditions and not be located in contaminated areas.</p> <p>3.3 Reference should be made to our Groundwater Protection: Policy and Practice (GP3) in sections 5.22 and 5.23. Our assessment of planning applications and land contamination issues are made in reference to this document.</p> <p>3.4 In sections 5.43 and 5.44 'Water supply and wastewater management,' the water efficiency measures included are acceptable and we agree with the water use targets outlined.</p> <p>3.5 We agree with section 5.40 stipulating that development on site will be expected to incorporate living roofs and walls as these have a number of benefits.</p>	<p>Noted.</p> <p>Noted. Para 5.12 of the SPD has been amended.</p> <p>Para 5.23 has been amended to make reference to Groundwater Protection: Policy and Practice (GP3).</p> <p>Noted.</p> <p>Noted.</p>
<p>4.0 Natural England</p> <p>4.1 We are of the opinion that generally the SPD addresses the areas that Natural England would wish to see addressed.</p> <p>4.2 We are encouraged to note that the design approach set out on page 26 includes "<i>a design and landscape strategy that incorporates a system of green open spaces and water features to create a robust green and blue framework for the site.</i>"</p> <p>4.3 It will be vital that green spaces created as part of the</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. These initiatives are already</p>

<p>development are considered together as a network and form the green infrastructure that underpins the development. Green spaces should link to each other and to existing green spaces outside the development site and should be designed to be multifunctional (such as accessible SUDS which are designed to benefit biodiversity). Green infrastructure should thread between the design fabric of the development and will include many of the features outlined in the document including living walls and roofs, tree lined streets and green spaces.</p>	<p>incorporated into the SPD under the heading landscape and open spaces strategy.</p>
<p>4.4 Natural England's London region is currently developing green infrastructure principles in order to help Councils, developers and others to understand the multifunctional nature of green infrastructure (GI) and to aid planners in designing GI to maximise its benefits. These principles are:</p>	<p>Noted.</p>
<p>4.5 Natural Signature: The greenspace network designed and managed to reflect or echo the extant or former natural landscape: providing a stronger sense of place, enhanced biodiversity and more robust ecological connections.</p>	<p>The SPD already incorporates these ideas at para 5.6 - 5.8 and also para 3.8</p>
<p>4.6 Natural Resilience: Promoting urban greening and making space for water: providing flood management and urban cooling through natural environment interventions for climate change adaptation.</p>	<p>The SPD already incorporates these ideas at Para 5.6 - 5.8 and also paras 3.2, 3.8 and 3.32.</p>
<p>4.7 Natural Health Service: People easily routed into local natural greenspace from their homes and work places: providing opportunities for physical activity, relaxation and healthy living.</p>	<p>The SPD already incorporates these ideas at paras 5.6 - 5.8 and also at para 3.2, 3.8 and 3.32.</p>
<p>4.8 Natural Play: Spaces which are wildlife-rich and occasionally 'wild' in nature: providing scope for the imaginative play that is essential for healthy child development.</p>	<p>Noted.</p>
<p>4.9 Natural Connections: People engaged in outdoor recreation and education, and volunteering for the natural environment: providing a reason to care about local environmental quality and their planet's future.</p>	<p>Noted.</p>
<p>4.10 We would encourage the Council to consider whether these principles are reflected in and will be facilitated by the SPD (and to make amendments/additions where necessary) and within future Policy Documents. We would also strongly encourage the Council to reflect these principles when planning and designing green infrastructure in the Borough and considering planning applications/ Masterplans etc.</p>	<p>Noted.</p>

5.0 English Heritage

5.1 In general terms, English Heritage welcomes the approach that has been taken to the historic environment in respect of this site in both the SPD and the SA. We are pleased to see that the history of the site has been included in the documents and that strong and distinct SA Objectives have been included in the SA for both landscape/townscape and the historic environment. This satisfies us that the SPD has been assessed satisfactorily in the context of the European Directive on the Assessment of the Effects of Certain Plans and Programmes on the Environment (2001/42/EC) (the SEA Directive).

5.3 More specifically, we concur with the treatment of SA Objectives 17 and 18 on pages 56 and 57 of the SA, although we consider that it might be worth indicating more explicitly that the site's archaeological potential is safeguarded by the processes recommended in paragraph 5.24 of the SPD.

5.4 English Heritage recommends that you include the European Landscape Convention, which was adopted by the United Kingdom in March 2007, in the international section of the plans and programmes table on page 65 and include a synopsis of it in the table that commences on page 67. Further guidance on the convention is available on our Historic Environment: Local Management (HELM) website www.helm.org.uk by searching the English Heritage section of the Guidance Library.

5.6 English Heritage notes that there did not appear to be synopses provided for all the national planning policy documents referred to as having been considered in the SA in the table commencing on page 67. We would welcome some explanation as to why some are summarised and some are not otherwise it is not clear why they have not been given an equal treatment.

5.7 We welcome the baseline information provided in respect of Scheduled Ancient Monuments, Listed Buildings and Buildings at Risk on page 89. We would welcome this being extended to convey the site's relationship to conservation areas, archaeological priority areas and registered parks and gardens of historic interest. It should also be noted that our Buildings at Risk Register has been extended to include all heritage assets and is now known as the Heritage at Risk Register. Consequently, any relationship to other heritage assets at risk, other than listed buildings, should also be identified. We also recommend the inclusion of "entries in the Heritage at Risk Register" as an indicator for SA Objectives 17 and 18 in Appendix C.

Noted.

The Sustainability Appraisal has been updated accordingly.

The Sustainability Appraisal has been updated accordingly.

It is considered that only the most relevant planning policy statements should be included with reference to the SPD.

The Sustainability Appraisal has been updated accordingly. Although there are no items of environmental heritage on the site, and there are no buildings at risk on or around the site, the SA has been updated to include reference to these issues to ensure such issues are fully explained through the SA process.

<p>5.8 English Heritage is of the view that the comments in the third column for SA Objective 18 on page 131 are not very clear and we would appreciate the inclusion of a little more detail to clarify them. We also note that we believe there is value in the observations made about this objective in Appendix F on page 168.</p> <p>5.9 In respect of paragraph 5.24 of the SPD, we can confirm that we would expect an archaeological assessment for this site. I am also advised that we would like to see a level 1/2 building recording set as a standard and the borough may like to consider whether this degree of detail is incorporated in this paragraph as well.</p> <p>5.10 Finally, English Heritage would strongly advise that the local authority's conservation staff are involved throughout the preparation and implementation of these documents, as they are often best placed to advise on local historic environment issues and priorities, sources of data, and consideration of options relating to the historic environment.</p>	<p>The explanatory comments in the SA at pg 131 and 168 have now been updated to provide more clarity for the reader.</p> <p>Para 5.24 has been updated to make it clear that an archaeological assessment will be expected.</p> <p>Noted.</p>
<p>6.0 Thames Water</p> <p>6.1 We welcome reference for the need for developments to incorporate sustainable urban drainage and reduce the risk of surface of flooding.</p> <p>6.2 We do have concerns regarding waste water services in relation to this site. Specifically sewage treatment capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks.</p> <p>6.3 As we have concerns regarding the provision of wastewater infrastructure to this development we welcome reference to the need to phase the development to ensure adequate water and wastewater infrastructure is provided.</p> <p>6.4 We support the references to water efficiency in the draft document.</p>	<p>Noted.</p> <p>Noted. These comments have been forwarded to the owners of the site for consideration in developing the site. Additional information will need to be submitted with any planning application. Para's 5.41 – 5.44 contain further specific guidance on this topic.</p> <p>Noted.</p> <p>Noted.</p>
<p>British Waterways</p> <p>6.5 The site is largely screened from the Grand Union Canal by the railway line, but we consider that there will still be an impact on the canal and its towpath from the future occupiers of the area, particularly as a convenient sustainable transport link, and an accessible public open space resource.</p> <p>6.6 Map 5 in the document shows the canal towpath as a</p>	<p>Noted.</p> <p>The SPD already includes specific</p>

<p>cycle and pedestrian route. We support the council's requirements for improvements to existing cycle-ways, improvements to encourage walking and improve the pedestrian environment on and around the site and general improvements to accessibility. The 600-800 additional residential uses and commercial uses will put significant demand on the towpath and waterway environment, and we feel that specific mention of the above improvements in relation to the canal should be made. Measures to improve wayfinding should also be included. In other areas of our network we have, in conjunction with TfL, undertaken Cycle Route Implementation & Stakeholder Plans (CRISP) which highlight specific improvements to important pedestrian and cycle routes such as surfacing treatments, cycle barriers and wayfinding signs etc. The council might wish to consider the requirement for a CRISP here.</p> <p>6.7 Many of the requirements of the Public Realm section of section 6: <i>Planning Obligations</i> are relevant to the pressures faced by the canal environment when there is an intensification of use from a development as large as could potentially occupy this site. In particular, maintenance such as litter collection, and crime prevention and CCTV needs.</p> <p>6.8 You may be aware that British Waterways has prepared a draft brief for a waterspace strategy, which identifies the potential and opportunities for the waterways within the borough (although this scoping report covers a limited stretch of the Grand Union Canal, it is hoped that the final strategy can be spread further to cover the entire borough). Considering the stage of the planning process for this site, we feel that as part of the planning obligations, contributions should be made towards the development of the waterspace strategy, or the implementation of its findings.</p> <p>6.9 The developers of the Stockley Park site, on the northern side of the canal, have discussed the potential for utilising the adjacent canal for transporting people to and from this site. A water shuttle service could replace or complement the existing minibus between West Drayton station and the site, while a waterbus/taxi service that could have stopping points at sites along the canal, including at the Hayes and Harlington goods yard site, the future development of Southall Gasworks, West Drayton station, Stockley Park and for the site the subject of this SPD. This opportunity is featured in the Waterspace Strategy.</p> <p>6.10 British Waterways would like to be involved at the earliest stages of any planning applications for the site, as a key local infrastructure provider serving the future</p>	<p>reference to improvements for walking and cycling, and para 3.40 has now been amended to include specific reference to British Waterways strategy. The developer would be expected to explore these various options with the Council and British Waterways prior to submitting an application.</p> <p>Noted.</p> <p>Para 3.40 has been amended to include reference to the British Waterways Waterspace Strategy. Negotiations regarding planning contributions will be addressed through the planning process.</p> <p>Refer to point 6.8 above. The initiatives suggested by British Waterways have been forwarded to the developers of the site and will be addressed through the planning process.</p> <p>Noted.</p>
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development.	
<p>7.0 <u>NATS Safeguarding</u></p> <p>7.1 The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Limited has no safeguarding objections to this proposal.</p>	Noted.
<p>8.0 <u>Civil Aviation Authority</u></p> <p>8.1 Whilst the CAA would not wish to comment on local development plans, where officially safeguarded aerodromes lie within the Council's area of jurisdiction, we recommend that the Council considers the need of such aerodrome(s) within your development plan and consult with the aerodrome operator(s)/licensee(s) directly.</p>	The Council has consulted BAA and have received detailed comments in relation to this SPD, refer to comments below.
<p>9.0 <u>BAA Safeguarding</u></p> <p>9.1 The site is located to the North of the Aerodrome Reference Point (ARP) at a distance of 3km. The approximate ground level is 30m, however this will need confirming on site.</p> <p>9.2 The site lies beneath the Obstacle Limitation Surface (OLS) called the Inner Horizontal Surface (IHS) which is detailed in CAA publication CAP 168, Chapter Four, which limits building and structure heights including cranes. The HIS is a horizontal plane located 45m above the elevation of the lowest runway threshold, therefore development and construction heights on site will be limited to 67.63m above ordnance datum (AOD).</p> <p>9.3 Building Design, height and materials have the ability to affect navigational aids at the airport. When more details of the proposed development are available an assessment should be conducted to determine the affects on these devices.</p> <p>9.4 The site lies close to the proposed third runway for the Airport and care must be taken with lighting to avoid glare or dazzle to pilots, enclosed is a copy of Advice Note 2 'Lighting near Aerodromes'.</p> <p>9.5 Landscaping schemes for this site must be carefully designed so hazardous birds are not attracted to the site. Any fruit/berry species must form less than 5% of the planting palette and those species must be distributed throughout the site, so as pockets of exploitable habitat not formed. This inclusion of 25% berry bearing plants as described in the consultation document is inappropriate in this location. With regard to tree planting, they must be</p>	<p>The comments from BAA have been provided to Inland Homes to inform the planning process and preparation of a masterplan for the site.</p> <p>The height limitations and airport safeguarding requirements have already been included at Para 5.9 of the SPD.</p> <p>Noted. This advice has been passed to the developers in order to inform the design process.</p> <p>The advice from BAA has been passed to the developers and will inform the planning process.</p> <p>Details regarding airport safeguarding are already included in the SPD at Para 5.9 and incorporate these requirements. The reference to 25% of berry bearing species has been deleted and replaced with the requirements as suggested by BAA.</p>

<p>planted at 4m centres so as to avoid continuous canopies from being formed as this can attract pigeons and corvids for nesting and roosting. Also Scots Pine <i>Pinus Sylvestris</i> and Oak <i>Quercus Robur</i> should be avoided as these species form dense canopies and will also be attractive to pigeons and corvids. Please see our Advice Note 3 'Potential Bird Hazards from Amenity Landscaping & Building Design'</p> <p>9.6 Water features could attract hazardous birds depending on their size and design, please see advice Note 3.</p> <p>9.7 Large areas of flat and shallow pitched roofs (generally roofs with a pitch of less than 15 degrees) can be attractive to gulls for nesting, roosting and loafing.</p>	<p>Para 5.9 of the SPD already states that any water features must be designed so as not to attract birds.</p> <p>This advice has been noted and included at Para 5.9 of the SPD.</p>
<p>10.0 <u>Defence Estates Safeguarding</u></p> <p>10.1 We can confirm that the Ministry of Defence has no safeguarding objections to this proposal providing any structures on the 3 sites do not exceed 91.4m in height.</p>	<p>Noted.</p>
<p>11.0 <u>Highways Agency</u></p> <p>11.1 As you may have noted from our previous correspondence, the HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's Strategic Road Network (SRN) (motorways and trunk roads) on behalf of the Secretary of State for Transport. In the case of the former NATS site, this relates to the M4 (junction 4) and M25 (junction 15). These sections of the M4 and M25 are currently congested during the peak hour period. Consequently, we would be concerned if any material increase in traffic were to occur on these sections of the SRN as a result of development at this site without careful consideration to mitigation measures.</p> <p>11.2 In spatial planning and development control terms, we have a duty to safeguard the operation of the SRN as set out in the DfT Circular 02/2007 (<i>Planning and the Strategic Road Network</i>). The circular encourages the HA to work co-operatively with Local Planning Authorities and to participate in all stages of the planning process to help achieve the Government's wider aims and objectives for sustainable development. As such, I have provided several comments below on specific matters raised by the draft SPD.</p> <p>11.3 The HA suggests that, Objective X is ambiguous and potentially suggests that car travel is promoted as a form of travel to and from the site. PPG13 comments that new</p>	<p>Noted.</p> <p>Noted.</p> <p>Objectives xi and xii of the SPD relate to sustainable modes of travel.</p>

<p>development should help to create places that connect with each other sustainably, providing the right conditions to encourage walking, cycling and the use of public transport. The HA is pleased to note that this ethos is promoted by the subsequent objective <i>xi</i>. As such, to avoid presenting potentially conflicting objectives, it is recommended that policy <i>x</i> is reworded to read: ‘To ensure that safe vehicular access is provided to and from the sit and within the local vicinity by incorporating traffic and transport initiatives wherever necessary while promoting the use of sustainable modes.’</p> <p>11.4 Further to the above point, it is noted in paragraph 3.6 that a masterplan will be required to be submitted with site proposals. The masterplan should ensure that safe and sustainable accesses are provided to the site for all modes, promoting sustainable travel at every opportunity.</p> <p>11.5 Promoting ‘sufficient’ car parking suggests that developments will be car friendly, which does not support the objectives of PPG 13. PPG 13 suggests that reducing the amount of car parking in new development is essential, as part of a package of planning and transport measures, to promote sustainable travel choices. The HA therefore recommends objective <i>xiv</i> is reworded to read: ‘To provide car parking throughout the site in accordance with the councils revised parking standards, including provision for disabled parking.’</p> <p>11.6 Rewording the objective in this manner would prevent contradiction with other parts of the SPD, in particular paragraph 3.41 which states: <i>‘any proposals for the site should aim to reduce reliance on the private motor vehicle in accordance with national and London Plan policy guidance.’</i></p> <p>11.7 The HA welcomes the requirement for a transport Assessment and Travel Plan to accompany any planning application for the site. Where developments are considered by the Council to have a significant traffic impact, given the site’s close proximity to the M4 (junction 4) the HA will expect to be consulted to determine the potential impact to the SRN. For your reference, DfT Circular 02/2007 describes how the HA, on behalf of the Secretary of State for Transport, will participate in evaluating planning applications.</p> <p>11.8 The HA supports the Council’s views in determining types of uses generally considered inappropriate on the site, as listed in paragraph 4.2 of the SPD. The HA</p>	<p>The SPD already sets out the requirements to promote public transport, walking and cycling, and ensure appropriate vehicular access in paras 3.31 – 3.48. This guidance will be followed through the planning process.</p> <p>Objective <i>xiv</i> has been reworded to ensure compliance with PPG 13, whilst also recognising the reality that people will continue to drive in outer London.</p> <p>Noted.</p> <p>The SPD has been amended in para 3.35 to include reference to DfT circular 02/2007.</p> <p>Noted.</p>
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<p>therefore supports the Council's aspirations to provide a mixed, balanced and sustainable community, therefore reducing the need to travel by private car.</p> <p>11.9 In addition to the above comments, the HA recommends that where services and facilities are planned, development in these areas should be correctly phased in line with improvements to sustainable transport. This will help ensure that private car trips are not established in behavioural patterns due to the inaccessibility of sustainable transport options and would be in accordance with PPG13.</p>	<p>Noted.</p>
<p>12.0 <u>Coal Authority</u></p> <p>Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.</p>	<p>Noted.</p>
<p><u>Consultancy</u></p>	
<p>13.0 <u>Inland Homes (the owners of the site)</u></p> <p>13.1 Paragraph 2.11 – the percentages quoted for buildings and hard standings (65%) mean that 35% of the site is soft landscaped. We estimate that this soft landscaped figure should in fact be 20%.</p> <p>13.2 Paragraphs 2.25 - 2.30 – the planning policy context, both adopted and emerging, is noted. However paragraph 2.30 requires minor alteration to make it clearer that any future planning application(s) will be judged principally against the then <i>adopted</i> policies and guidance.</p> <p>13.3 <u>Industrial and Commercial uses</u> - paragraphs 2.39, 3.1 (v) & (xvi), 4.1, 4.31 to 4.36, and 4.40 to 4.42. As part of the background technical work on the LDF, the Council's <i>Employment Land Review (July 2009)</i> recommends (Recommendation 12) that the whole of the Warwick Road IBA should be de-designated as an IBA. This includes the part that falls within Area A. This de-designation is supported by the owners and is part of the '<i>Option 3 Proactive Approach</i>'. Recommendation 12 estimates that the future employment generation potential from the whole of the Warwick Road IBA (including Area A) is in the range 0–50 jobs.</p> <p>13.4 Inland Homes intend to pursue a housing-led regeneration of the site to include a number of ancillary employment-generating uses comprising a new primary health centre, a care home and a small number of small retail units. The care home will generate a significant number of new jobs in its own right. This has been quantified by Pinders, who have specialist knowledge and</p>	<p>The specific percentage of hard standing area has been deleted from the SPD at para 2.11.</p> <p>The assessment of any planning application/s for the site will be against all relevant policies and material considerations. The weight given to draft policies or other planning guidance will be determined accordingly.</p> <p>The uses proposed for the site will need to be justified to support any planning application.</p> <p>The proposed uses will need to be justified against relevant policies to support the planning application.</p>

<p>experience of the healthcare sector, as being approximately 85 ‘full-time-equivalent’ skilled, semi-skilled and unskilled jobs working a 24 hours shift system. It is reasonable to assume that many of these jobs will be filled by local people. Further jobs will be created within the proposed new health centre and shops. These uses, which are primarily aimed at serving the local community, will ensure that the Council’s estimate of up to 50 jobs is significantly exceeded.</p> <p>13.5 The Inland Homes scheme will seek to create a high quality residential neighbourhood with low traffic volumes which will significantly enhance the character and amenity of this part of West Drayton. The owners do <u>not</u> consider that other employment-generating uses referred to in the draft SPD such as light industrial/starter units, creative industries, etc. would be compatible with their future vision for the site which is evolving through the masterplan process.</p> <p>13.6 For the above reasons the owners object to all references in the draft SPD which seek to encourage industrial uses on the site and contend that the document should be amended by removing these references.</p> <p>13.7 Paragraph 3.1(v) - the reference to ‘<i>police</i>’ in (v) is unnecessary because this facility has already been built within the St George’s ParkWest development and is available for use – see condition no. 19 of consent 5107/APP/2005/2082. There is no need to duplicate this facility on Area A.</p> <p>13.8 Paragraphs 3.1 bullet 2, 3.8 & 3.23 – the references to ‘<i>water features</i>’ and ‘<i>blue framework</i>’ have no adopted policy backing and are inappropriate. The only water ‘features’ in this area are the drainage channel that runs east-west through the railway land beyond the northern boundary of Area A; and the culveted surface water drain which runs north-south across Area A from the northern boundary to Porters Way. The owners do not intend to create new water feature(s) within the site itself, although a comprehensive SUDS scheme will be incorporated to deal with surface water drainage. This paragraph should be amended to delete these references.</p> <p>13.9 Paragraph 3.21 – this paragraph fails to recognise the strong constraints imposed on the design of new development on the western part of Area A by the scale, design and massing of the St George’s scheme. During recent discussions on the emerging masterplan, we believe it has been agreed that for architectural and urban</p>	<p>The provision of some appropriate light industrial uses are considered acceptable within a residential area.</p> <p>Noted. Provision of employment generating uses will need to be explored, as suggested by the GLA.</p> <p>Following discussions with the Met Police it is concluded that a new purpose built facility would not be required on the NATS site. However, any management/security company for the developers would be expected to work in close co-operation with the safer neighbourhood team based in West Drayton.</p> <p>The requirements for a blue and green framework through the site are supported by Natural England, British Waterways and the Environment Agency. These policies are based on the London Plan policy 4C.3.</p> <p>The Council recognises that the St George’s scheme places a number of constraints on the redevelopment of this site. However, officers recommend that the scale and density of the development should</p>
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<p>design reasons, the height of flatted buildings adjacent to the St George's boundary may be between 4 and 6 storeys , grading down to mainly 2/3 storey housing adjacent to the eastern boundary of Area A. It would be wholly inappropriate to limit building heights to 2/3 storeys across the whole site as suggested, and this paragraph of the draft SPD should be amended to reflect the design principles that are being followed in the pre-application masterplan and design process.</p> <p>13.10 Paragraph 3.29 – the reference to developer contributions towards the Stockley Park Recreation Ground may well not be appropriate or necessary. St George have already committed to paying £125,000 for this work under their Section 106 agreement and this money has not been spent despite being committed in early 2006. It is, therefore, inappropriate for the SPD to seek further sums without the Council adopting a clear strategy and timescale for how and when money will be spent improving this community facility, and what arrangements will be put in place for future supervision, maintenance etc. It is known that considerable sums have been spent in the past on improving this recreation ground, including play equipment, which has then been vandalised and had to be removed. The owners consider that, without a clear strategy for the site, further investment might well be wasted and no significant benefit to the local community achieved.</p> <p>13.11 Paragraph 3.40, bullet 3 – Uxbridge underground and bus station is located some 4 miles north of the development site. Any trips to the underground or bus station would require a 40 minute bus ride and they are therefore not accessible on foot. Analysis of Journey to Work 2001 census dataset for residents within the West Drayton Ward identifies that only 3.7% of all journeys to work use London Underground services as a main mode of travel.</p> <p>13.12 As a proportion of the total Walk and Public Transport Journeys to work, Underground accounts for 13.68% percent of trips, which for this site would account for approximately 44 and 23 two-way trips on the underground network during the peak hours based upon an assumed 800 units.</p> <p>13.13 It would be expected that the vast majority (if not all) underground trips would access the LUL network via Ealing Broadway station on the Central Line, as this offers the fastest and most direct route into Central London. The development proposals will therefore have a negligible impact on Uxbridge bus/ LUL stations and as such, the suggested contributions are deemed inappropriate and contrary to <i>ODPM Circular 05/2005: Planning Obligations</i> and should be deleted.</p>	<p>not be repeated on this site.</p> <p>The funding arrangements to support public open space will need to be negotiated through the planning process. However, it is recognised that £125,000 would not be sufficient to carry out all improvements to the Stockley Recreation Ground and additional funding from this development could provide significant improvements to the recreation ground.</p> <p>Para 3.40 bullet 3 has been corrected to refer to West Drayton station and town centre, and other bus improvements more closely associated with this site.</p> <p>Refer to point 13.11 above.</p> <p>Refer to point 13.11 above.</p>
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<p>13.14 Paragraphs 4.5 to 4.9 – the detailed masterplanning work that is in progress indicates that the site is capable of accommodating 800 dwellings comprising approximately 500 flats and 300 houses. It is agreed that the precise number should be dictated by following appropriate design and masterplanning principles, rather than slavish adherence to arbitrary numerical figures in the London Plan development matrix.</p> <p>13.15 Furthermore, on a site of this size, it is more appropriate to assess density in terms of habitable rooms per hectare or bedspaces per hectare, rather than simply number of units per hectare which does not distinguish between a 1-bedroom flat and a 5-bedroom house. The appropriateness of these measures should be recognised in the SPD.</p> <p>13.16 Subject to these comments, the Council's suggested design-led approach to the issue of density in paragraph 4.9 is supported and welcomed.</p> <p>13.17 Paragraph 4.12 – there is no policy backing for requiring all new housing on the site to meet a minimum of Code level 4. This paragraph should be deleted because it is both incorrect and duplicated by paragraph 5.35 – see comments under item 13.18 below.</p> <p>13.18 Paragraph 4.19 – 4.23 – it is agreed by the owners that it would not be in the interests of creating a balanced community for there to be a '<i>significantly high</i>' proportion of affordable housing on the site (paragraph 4.21). It is also agreed that the appropriate proportion should be determined in the light of other SPD objectives and material considerations, pre-application discussions, and a financial viability assessment (FVA).</p> <p>13.19 The SPD should refer to the various well-established measures of affordable housing percentages, including number of units, habitable rooms, and bed spaces.</p> <p>13.20 The owners are currently exploring the financial viability of other intermediate housing 'models' and welcome the Council's apparent willingness to consider such initiatives on this site alongside more conventional affordable housing models.</p> <p>13.21 Paragraphs 4.24 – 4.26 – this section of the SPD is too vague and should provide much more detailed guidance on the Council's requirements. The provision of specialist housing has major cost and design implications on a development of this size and vague, non-quantifiable</p>	<p>Noted.</p> <p>Para 4.9 of the SPD has been updated to provide further guidance and clarity for the redevelopment of this site. The habitable room densities are consistent with the draft SPD, and the London Plan density matrix for a suburban location with a low PTAL.</p> <p>Noted.</p> <p>Para 4.12 has been amended to encourage higher standards for sustainable homes.</p> <p>Noted.</p> <p>The SPD does not set out any specific figure for a percentage of affordable housing to aim for, as this will be agreed through the planning process.</p> <p>Noted.</p> <p>There was strong support for elderly housing during the consultation. It is not considered appropriate to include more detailed guidance in the SPD.</p>
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<p>aspirations are unhelpful to the design and planning process.</p> <p>13.22 Paragraph 4.30 – the owners are aware of the Council's requirement (Affordable Housing SPD, May 2006, paragraph 8.6) that the affordable housing should be evenly distributed throughout the site and designed to be indistinguishable from the other units. However, on a site of this size, which will be developed in phases over a number of years (5-8 years estimated) according to a timetable that takes account of market conditions (including the current very challenging market conditions), it is likely that prudent ownership and management considerations on the part of both the RSLs and the developers will dictate that the affordable housing should be provided in efficient and easy-to-manage clusters across the site. For example, the proposed phase 1 area in the north-east corner of the site is likely to be substantially affordable housing.</p> <p>13.23 Although used in the Affordable Housing SPD, the term 'pepper potted' is ill-defined and vague, and as a result is only likely to impede the design and implementation of the scheme. The SPD should be amended <u>either</u> to clarify much more clearly what criteria should be applied to the distribution of the affordable housing across the site (eg. clusters not to exceed 50 units and to be at least 50 metres apart), <u>or</u> delete the reference entirely and rely on a condition requiring the developer to submit an affordable housing scheme to the Council for approval before development commences. The affordable housing scheme would identify the location of the affordable units, and define tenure (rental/shared ownership/intermediate etc.), size, mix, specification, programming etc.</p> <p>13.25 Paragraph 4.37 – the owners fully support the principle of upgrading of the Mulberry Parade shops, with some possible limited expansion of convenience floorspace on Site A. The owners are willing to enter into discussions with the Council's Property Department on this matter but on the <u>strict understanding</u> that they cannot take any responsibility for sponsoring proposals for redevelopment of Site B, and that any planning application for the redevelopment of Site B should not be linked in any way to any future planning application for Site A.</p> <p>13.26 For the avoidance of doubt, the owners wish to emphasise that the redevelopment of Site B must remain the Council's sole responsibility as landowner and potential developer, and there must be no direct linkage between future planning application(s) for the 2 Areas.</p> <p>13.27 Paragraph 4.45 – pre-school facilities are already provided within a number of full and part-time day</p>	<p>Officers recognise that affordable housing models will dictate that affordable housing will need to be provided in small clusters around the site for management reasons. The SPD provides guidance to avoid a concentration of social housing within certain areas of the site, to ensure balanced communities.</p> <p>The term pepper potted is widely used in the Housing industry. It is not desirable to set out numerical requirements for 'pepper potting' in the SPD, as the provision of affordable housing would be determined through detailed design analysis of the masterplan, the location and characteristics of the residential components, the proportion of affordable housing for the site and a range of other considerations.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
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<p>nurseries within easy reach of Area A. These include:</p> <ul style="list-style-type: none"> • West Drayton Primary School, Nursery • Longmead Primary School (Tenderlinks Day Care) • Cherry Lane Primary School (Bizzy Kids) • Bell Farm Christian Centre, South Road, West Drayton (Baby Gems & Little Gems) • Busy Bees, Stockley Park • Premier Montessori Nursery, Trout Road, Yiewsley • Buffer Bear Nursery, Sipson Lane, West Drayton • Little Treasures, Daleham Drive, Hillingdon • Wonderland Nursery, School Road, West Drayton • Tiny Gems, Christ Church, Waltham Avenue, Hayes <p>13.28 In addition, there are 2 day nurseries in the area which have been built but never opened being: Harlington School, Pinkwell Lane, has a new early years' centre which has remained unopened since being constructed in 2003/04. The former DRA site off Kingston Lane has a nursery which has stood empty for over 2 years since development was completed by Fairview Homes.</p> <p>13.30 With this level of existing provision in and around the West Drayton area, the owners consider that there is no need to construct another new pre-school facility on Area A, nor should they be expected to make any financial contribution towards additional provision elsewhere in the area as part of any section 106 agreement. The SPD should be amended to reflect this situation.</p> <p>13.31 Paragraphs 4.54 – 4.59 – as part of the pre-application process, the owners have already carried out 2 rounds of widely-publicised public consultation involving public exhibitions about the future use of the site. The results of this community engagement will be described in a detailed <i>Statement of Community Involvement</i> which will accompany the forthcoming planning application. In July 2009, the Council also conducted its own public exhibition and consultation related to this draft SPD.</p> <p>13.32 The feedback that has been received by the owners indicates strong public support for the principles that are evolving in the masterplan for the site, including the provision of a new primary healthcare facility, small-scale retail facilities, a care home, and a hierarchy of open space/recreations areas to include children's play areas.</p> <p>13.33 In the southern part of the Borough there are 2 Council maintained youth centres, staffed by full-time youth and community workers: West Drayton Youth Centre, Harmondsworth Road, West Drayton Harlington Young People's Centre, Pinkwell Lane, Hayes. West Drayton Youth Centre is located a short distance to the</p>	<p>Noted.</p> <p>The Council's Families Information Service has stated that there is a requirement for further pre-school facilities.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
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south-west of the NATS site within easy walking distance. The centre provides a wide range of activities including general activities area, coffee bar, outdoor all-weather pitch, motor vehicle workshop, music workshop with fully equipped recording studio, arts, craft and design workshop, computer workshop (including internet), and fitness and drama dance studio. In the north-east corner of Area A is the 1381 West Drayton and Yiewsley Air Training Corp facility which will be unaffected by the proposed redevelopment of the site. This ATC squadron provides training facilities for young people between the ages of 13 and 20. Cadets meet at least twice weekly with occasional weekend/weeklong camps, and participate in various activities including shooting, sport, drill, Duke of Edinburgh Award Scheme, leadership, team building and training on aeronautics.

13.34 Bell Farm Christian Centre is located in South Road a short distance to the south of the NATS site. The centre provides a range of activities for all age groups including part-time crèche, mother and toddler meetings, weekly older persons' lunch and social club, street dance and vocals, regular Christian worship, indoor badminton, English language classes, driving theory classes, and other community based activities. The centre has a good-sized hall that is available for public hire.

13.35 This information demonstrates that all sections of the local community in this part of West Drayton are already well-served with community facilities. Inland Homes, therefore, considers that the emphasis should be upon making best use, and securing the long-term future of the existing community facilities, rather than providing new facilities on the NATS site with all the associated long-term management, staffing and financial implications that would be involved.

13.36 Consequently, the owners consider that, subject to detailed discussions with the Council, there may be justification for a section 106 financial contribution towards the maintenance/improvement of existing facilities in the area as the most cost effective and efficient means of making provision for the long-term needs of the future residents on the NATS site. Inland Homes are willing to discuss this matter in detail with the Council during the pre-application stage, and request that the SPD is amended to reflect this approach.

13.37 Paragraphs 5.2 and 5.3 – in view of the Screening Direction issued by the Secretary of State for Communities and Local Government on 3 August 2008, the owners consider that this section of the SPD should be amended to reflect the fact that an Environment Statement should be submitted as part of any planning application for redevelopment of the site. It would be helpful if this

The Bell Farm Christian Centre offers an invaluable community service. However, it is operating at capacity at the present. The community centre should not be relied upon to provide community services for all new residents of the NATS redevelopment.

Given that the existing community facilities are operating at or near capacity at present, the additional 800 homes and expected population increase will have implications for community facilities and services in the immediate area.

It is considered appropriate that some community facilities are provided on the site.

Para 5.2 and 5.3 provide necessary details, and given that circumstances could change if say the site was sold, or a development proposal were for something different, a request for a screening opinion could potentially state that

<p>section of the SPD could also specify what specific issues the Council consider need to be addressed in the EIA to assist the 'Scoping' process under the 1999 Regulations.</p> <p>13.38 Paragraph 5.35 – The UDP 'saved' policies and the London Plan constitute the current statutory Development Plan for the Borough. These plans were produced and adopted prior to The Code for Sustainable Homes – Technical Guide, which was published by the Department for Communities and Local Government, in April 2008. The requirement to meet Code Level 4 is not supported by any policy in the statutory Development Plan, nor does the UDP refer to the former BRE 'Eco Homes' assessment (now superseded by the Code to Sustainable Homes). The emerging LDF does not make reference to the Code for Sustainable Homes, although the following documents are stated as informing emerging policy: <i>London's Warming, the impacts of climate change on London GLA (2002)</i>, <i>The Mayor's Energy Strategy - Green Light to Clean Power (2004)</i> <i>Sustainable Design and Construction (May 2006)</i></p> <p>13.41 The London Plan Consolidated with Alterations 2004 (Feb 2008) indicates that standards in The Mayor's <i>Sustainable Design and Construction SPG</i> which provides an 'essential context' for all developments should be revised at the earliest opportunity to reflect the Code for Sustainable Homes (December 2006). The Mayor's Strategic Housing Investment Plan will set out the timetable for moving from Code level 3 to higher levels in the Code for publicly funded residential developments.</p> <p>13.42 The water use target for residential development set out in London Plan Policy 4A.16 reflects the requirements to achieve Code Level 3. The Mayor's policy context also indicates that the standards in the <i>Sustainable Design and Construction SPG</i> will be revised to bring them in line with the Code for Sustainable Homes.</p> <p>13.44 The Draft London Plan April 2009, makes reference to the Code for Sustainable Homes. Chapter 5, London's response to climate change, states that, '<i>as one of the range of policy mechanisms towards meeting C02 reduction targets, the use of the national Code for Sustainable Homes with the expectation that, where possible, new development in London will achieve the highest code levels for energy considerations</i>'.</p> <p>13.45 Against the background of these adopted and emerging policies, there is no justification for requiring this development to achieve any higher level than Code level 3 at the present time. The SPD should be amended to reflect this policy context.</p>	<p>an EIA is not required.</p> <p>Noted. Officers consider that an aspiration to achieve Code for Sustainable Homes level 4 is not unreasonable, given the timeframe for developing the site and governments emerging policy set out in the Code for Sustainable Homes and other guidance/legislation, such as PPS 1 Supplement and the Planning Act, 2008.</p> <p>Noted.</p> <p>Noted</p> <p>The Mayor's proposals for the London Plan, April 2009, makes it clear that the Code for Sustainable Homes is a useful tool in helping to provide more energy efficient housing for London.</p> <p>The SPD does reflect the current policy context, however it also provides flexibility and an appropriate approach to ensure that redevelopment of the site into the future will be compliant with the relevant legislation at that time, particularly the Code for Sustainable</p>
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<p>13.46 Paragraph 5.45 & 5.46 – the owners do not accept that this site should be identified as the first site in the Borough to achieve zero-carbon status.</p> <p>13.47 The owners are committed to exploring innovative energy and carbon reduction technologies for the site but these will only be implemented if shown to be cost efficient and achievable. Discussions are in progress with officers on this subject.</p> <p>13.48 At the present time, there is no planning policy basis for this zero-carbon, ‘exemplar development’ aspiration by the Council, and any such requirement would be strongly resisted by the owners. These paragraphs in the draft SPD are therefore inappropriate and should be deleted.</p> <p>13.49 Section 6 – the principles set-out in paragraph 6.1 upon which section 106 obligations will be based are broadly accepted by the owners. However, the detailed obligations under each subject heading will depend upon a proper assessment of that subject and the Council should not at this stage be stating that certain obligations ‘<i>will be</i>’ required. In each case the words ‘<i>will be</i>’ should be replaced by ‘<i>may be</i>’ or ‘<i>likely to be</i>’ to reflect the fact that every obligation must be justifiable and reasonable within the overall FVA context, and meet the tests specified in Circular 05/2005. The owners request that the wording within each subject heading in Section 6 should be amended accordingly, and also to reflect the other comments in this letter.</p>	<p>Homes.</p> <p>Officers consider it appropriate to encourage zero carbon development on this site.</p> <p>Noted.</p> <p>Refer to 13.46 above.</p> <p>The wording in the SPD is considered justifiable.</p>
<p><u>Residents & Community Groups</u></p>	
<p><u>14.0 Yiewsley & West Drayton Town Centre Action Group</u></p> <p>Summary of meeting on 10th August 2009 with Mr. Stephen Timms, provided by the Chair – Mr John Davies.</p> <p>14.1 Housing - Members discussed proposed density of 600 to 800 homes for this site. Questions were raised as to the actual need for further residential development in this part of the Borough. However, it was accepted that residential development was the preferred option. Members accepted the proposal for a total of 600 to 800 units as the maximum density to be allowed on this site, with the lower figure as the preferred optimum.</p> <p>14.2 The general preference was for all houses, although the proposal for a mix of flats and houses was accepted, albeit reluctantly.</p>	<p>Noted. Officers appreciate the concerns around additional houses are driven by concerns about the impacts that may arise from those houses, traffic, safety and security, demands on community facilities, infrastructure and the like. The SPD sets out a range of requirements to address those issues.</p> <p>A mix of housing types will help address the housing needs for the local area.</p>

<p>14.3 Members were opposed to any inclusion of social housing. Members agreed that if affordable/social housing was to be included, the proposed percentages were deemed to be too high. Preference should be given to part buy/part rent scheme in order to allow members of the community to achieve a foothold on the housing ladder. Social renting should be a very low priority as it was accepted that the area had sufficient housing for social rent.</p>	<p>The requirements for social housing are set by the London Plan. However the SPD does state that the characteristics of the local area should dictate the level of social housing, rather than strictly adhering to the London wide 50% target.</p>
<p>14.4 Provision for specialist housing for the elderly is an important factor and should be included in any development.</p>	<p>The SPD sets out requirements for elderly housing to be provided as part of a redevelopment of the site.</p>
<p>14.5 <u>Community Facilities</u> - Members agreed that the provision of a GP Surgery/Medical Facility on site was regarded as being a priority. It was noted that alongside the Park West development there will be 1400+ residential units on both sites. Consultations with the community indicate that the provision of a medical facility was paramount. This facility should be a legal requirement when planning permission is granted. Members noted that despite West Drayton taking the brunt of new developments – upwards of 1800 units including the DERA site – the area has lost two surgeries. West Drayton now only has one GP facility situated on The Green. Members agreed that any medical provision on this site should not detract from the provision of a new Health Centre in Yiewsley. Neither should it result in the closure of existing facilities.</p>	<p>The SPD sets out requirements for the provision of health facilities on the site, along with contributions towards a consolidated health facility in Yiewsley town centre. The provision of medical facilities will need to be agreed through the planning process, however it is expected that appropriate facilities will be provided commensurate with the scale of development in the area.</p>
<p>14.7 Note: Page 12 of the Draft SPD states there are 5 Doctors surgeries in the area, there is no data included to support this claim. As previously stated there are surgeries to be found on The Green in West Drayton; Yiewsley Health Centre and Otterfield Road.</p>	<p>The reference to the number of Doctors surgeries has been amended in para 2.15.</p>
<p>14.8 Members felt that there was likely to be a need for a children’s nursery on the site.</p>	<p>Noted. Refer to point 13.30 above.</p>
<p>14.9 Councillor Horn informed the Group that Bell Farm Christian Centre would like to see a community centre on the site. A discussion took place as to whether this would be the best option or to ask the developer for funds to enhance the existing facilities within the area. The current facilities that could benefit from enhancement are Bell Farm Christian Centre; Yiewsley & West Drayton Community Centre and West Drayton Youth Centre. All facilities are within walking distance from the site.</p>	<p>The SPD already sets out the requirements for space for some community services/facilities to be provided on the site in paras 4.53 – 4.58.</p>
<p>14.10 If the development does not include on site security members felt the provision of a police safer neighbourhood centre would be beneficial.</p>	<p>It is likely that the developers will provide management of the site, at least through the construction phase of the project, which could last some</p>

<p>14.11 Members felt that improvements to open space and children’s playgrounds are essential. Members noted that the Parkwest development had already made provision of £125,000 S106 monies for the recreation ground at Stockley. It was felt that the developer should be asked to contribute to the enhancement of Drayton Hall Park and The Closes. Improvements to both these major open spaces would enhance the available recreational facilities for the new development and the community as a whole.</p> <p>14.12 <u>Commercial & Employment</u> - It was agreed that the existing shops on Mulberry Parade should be protected and enhanced. It was suggested that the shops could be sold to the developer who would in turn redevelop the site with the provision of a modern shopping parade, with new shops, there would be benefits for the whole community and it would also enhance the area.</p> <p>14.13 <u>Transport</u> - Discussion took place as to the implications of vehicular traffic both for the immediate area and the High Streets. Members noted the suggestion that when Crossrail replace the pedestrian bridge in Kingston Lane, it should be replaced with a vehicular access bridge. This may have the benefit of redirecting traffic away from the High Streets. Members were reminded that a submission, which included this suggestion, had already been made to Crossrail and the Council. Members stated that the existing bridge did, at one time, take vehicles. As the adjoining site is still being developed, Members felt it was difficult to form an opinion as to the effects vehicular access would have on the area. However, they agreed it would have a major effect.</p> <p>14.14 Members agreed that there should be improved pedestrian and cycle links on and around the site, especially to the town centre. Members agreed that the current cycle provision, particularly in the town centre, was inadequate, unsafe and did not encourage the use of cycles as a mode of transport.</p> <p>14.15 There was broad agreement for ‘Green’ Energy to be produced on the site and for the development to have significant water conservation measures.</p> <p>14.16 In addition to the above issues, concern was expressed as to the provision of educational facilities. This subject was not included on the feedback form. It was noted that West Drayton Primary School was now full and unable to expand. The distances to the other primary</p>	<p>years. The financial contributions towards a police safer neighbourhood centre could be utilised more efficiently for police services.</p> <p>Public open space will be provided on site from this development, however the additional population will also place increased demands on the surrounding public recreation grounds, including Stockley Park. It is likely that contributions will be sought for this facility.</p> <p>Noted.</p> <p>It is unlikely that the pedestrian bridge over the railway line could be replaced with a vehicular bridge as part of the Crossrail development, or as part of the funding from the NATS redevelopment on its own. The SPD includes reference to crossrail and the importance of improving pedestrian and cycling links around the site.</p> <p>Noted.</p> <p>Agreed.</p> <p>The Council’s Education section have stated that there is some potential to expand West Drayton primary school and this is being explored at present. Improvements</p>
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schools within the area were deemed too far for young children to commute by foot. It was felt that developments of the size of the DERA; Park West and NATS sites warranted a new school, preferable built on site or within walking distance of the developments.

14.17 Finally, the Group were agreed that it was a major priority that the SPD and the developer's plans should have a fully integrated infrastructure in place before any consideration is given to planning permission.

to education facilities will be required to ensure the additional population does not place a strain on the existing education facilities.

The provision of physical and social infrastructure will be critical to ensure that the redevelopment of this site is positive for the wider area. The timing and logistics of providing this infrastructure will also be critical, and this will be resolved through the planning process.

15.0 Bell Farm Christian Centre

15.1 With the development of the former RAF site and the National Air Traffic Services site we believe that there needs to be a significant increase in the capacity of Bell Farm Christian Centre to cope with the demand that will be placed on it by the new residents.

15.2 Over the last few years Bell Farm Christian Centre has been fully stretched trying to meet the demands of the existing community. A lack of revenue funding as well as space within the Centre has limited what we can do. There are waiting lists for some of our services. The Advice Information and Care Service which previously was seeing approximately 450 people a year will probably be used by about 1200 people this year.

15.3 To help increase the capacity of the Centre plans were drawn up some time ago to extend the property so as to provide additional facilities. These have obtained Planning Permission and the Organisation is now looking raise £1.3million to allow this extension to the property to be built. This development will not provide the Centre with all the facilities that it needs to meet the current local demand but is the best that can be achieved given the limitation of this site. The Management Committee of Bell farm Christian Centre is therefore concerned, that with the significant increase in population that is anticipated with these current developments, that Bell Farm Christian Centre will be overwhelmed by the demand for its services.

15.4 In the light of the Management Committee of Bell Farm Christian Centre believes that negotiations with the developers should include requests for funding for the following:

15.5 It is our belief that additional community facilities need to be provided on the new development. The existing or extended Bell Farm Christian Centre will never be large enough to meet all the needs of the community and a facility to be built on the new site.

15.6 The Management Committee of Bell Farm Christian Centre have recognised that the management of such a facility is absolutely crucial and there needs to be a dedicated and experienced team ensuring that the facility is well cared for and effectively used. Bell Farm Christian Centre would be prepared to take responsibility for the

Noted. The increase in population will create extra demands on community facilities in the locality.

It is clear that whilst the Bell Farm Christian Centre provides an invaluable service to the community, there is a limit to what can be provided on this site, without significant improvements to the centre.

Further extensions to the Bell Farm Christian Centre would require funding from various streams. Given the additional population will create an additional demand on these services s106 contributions will be sought from the developer to facilitate this.

The SPD states that the demand for community facilities will need to be assessed and it is likely that some space for the community should be provided on site.

The logistics of providing a community facility on the site will need to be negotiated with the developers through the planning process. The SPD sets out the requirements under Para's 4.54 -

<p>management of such a facility on the understanding that such a facility would be run with regard to the Christian Values and Ethos of the Organisation.</p> <p>15.7 It is our belief that a facility on the site, which could perhaps include a large hall, or two other rooms, an office and toilet facilities, could be developed to be used for activities such as older persons' events, toddler groups, children's clubs, youth activities, community meetings etc.</p> <p>15.8 As stated above there is an urgent need to extend the existing property to accommodate the existing services and new services. Plans have already been approved and the cost of this development is estimated at approximately £1.3 million (£1,300,000). The Management Committee of Bell Farm Christian Centre would respectfully ask if some of the money for the community, provided by Inland Homes, could be allocated to such an extension.</p> <p>15.9 The Management Committee of Bell Farm Christian Centre recognises that in addition to the need for additional infrastructure for the increasing population there is also a need for revenue funding to provide community development work. There is no value in having a beautiful purpose built facility if there are not the resources to develop and use the facility for the community. Community development work is crucial and therefore we would also suggest that Section 106 money should be allocated towards community development work over an initial 5 year period. This would primarily be the salary of a worker plus some additional funds to facilitate the development of activities. It is estimated that approximately £250,000 would be needed over 5 years for a worker.</p> <p>15.10 Whilst writing I should also like to express my concern regarding Mulberry Recreational Ground. I understand that St Georges have given £125,000 for improvements to Mulberry Recreational Ground as part of their Section 106 contributions. In recent years Mulberry Recreational Ground has had some significant improvements but it still remains an area that is abused by small section of the community. It is a valuable resource but unfortunately it is not conducive to play for young people because of vandalism and broken glass etc. I am concerned that £125,000 spent on further improvements to the site, which on the surface may look very good, in the long term will not affect the value of that site for the local</p>	<p>4.59.</p> <p>Officers also recommend that such facilities could be incorporated in to the masterplan for the site. The Youth Council, and various individuals, have requested communal space that could be utilised for various communal functions</p> <p>Officers also recognise that the provision of facilities and physical space is only a small part of the funding requirements for community facilities. The SPD has been amended to highlight this issue at para 6.1(e) to ensure that future negotiations also include reference to the need for ongoing funding and management.</p> <p>Noted. Para 6.1e already refers to the need to provide on-site facilities and/or cash contributions for off-site facilities. The package of s106 contributions will need to be considered as a whole in determining the planning application.</p> <p>The suggestions from Bell Farm Christian Centre have been shared with Council's Green Spaces team. It is considered that the redevelopment of the NATS site should also provide contributions towards the improvements to Stockley recreation ground. A top up amount could be utilised for workers, or to provide seed funding to encourage more community involvement in the improvements to the Mulberry Parade ground.</p>
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<p>community. I would respectfully ask that consideration is carefully given as to whether this money could be better spent in other ways. One suggestion is that money is not spent on capital improvements but rather on workers to encourage outdoor play amongst the young people in the area.</p>	
<p>16.0 <u>The Theatres Trust</u></p> <p>16.1 Large scale residential developments should provide community facilities as part of their open space provision. Any new community facility should be multi-purpose in nature providing indoor space for leisure, arts, community and entertainment events. Such facilities should be centrally located, with good access for pedestrians, cyclists and car drivers.</p> <p>16.3 We note that the Council will ensure that demand for multi-purpose community halls generated by the creation of new homes is within easy reach, and by requiring house builders to contribute towards the improvement of an existing hall or the provision of a new one. Extending an existing building would be the first option for consideration to provide for community buildings which should be flexible to include space for cultural facilities such as a performance area. The buildings should also be designed to take into account the possibility of antisocial behavior and the need to reduce its impact on the environment.</p> <p>16.4 We look forward to being consulted on further planning policy documents especially the Core Strategy Submission, Development Control Policies and any town centre Area Action Plans.</p>	<p>Community space facilities are required through the SPD, to be agreed through the negotiating process. There are a range of existing community facilities in close proximity to the site, such as Bell Farm Christian Centre, that provide a large space for community meetings.</p> <p>Noted.</p> <p>Noted.</p>
<p>17.0 <u>Denham Parish Council</u></p> <p>17.1 Denham Parish Council has no objection to the proposals.</p>	<p>Noted.</p>
<p>18.0 <u>Burnham Parish Council</u></p> <p>18.1 Burnham Parish Council's Planning Committee has received and noted your document. The only comment was that it has concerns of infrastructure.</p>	<p>The development will be expected to provide funding and other improvements to existing infrastructure to ensure there are no adverse impacts on the surrounding area.</p>
<p>19.0 <u>Iver Parish Council</u></p> <p>19.1 Iver Parish Council Planning Committee are concerned about the increase of residential traffic through</p>	<p>The impacts on traffic arising from the development will be detailed in</p>

<p>Iver and have noted the public transport plan.</p>	<p>the Transport Assessment (TA). The SPD includes requirements to minimise adverse impacts and detailed studies will need to be undertaken to support any planning application for the site.</p>
<p>20.0 <u>Fulmer Parish Council</u></p> <p>20.1 Although not directly impacting on Fulmer, we are concerned that acceptable standards are set. In particular, we would not want adverse precedents near our parish.</p> <p>20.2 As the site is in a residential area, it does seem suitable for residential development and would help towards meeting housing targets. We would welcome the retention of trees and vegetation of merit, and, of course, further additions. Likewise, the provision of public open spaces. It should be predominantly two-storey development, because of the proximity to Heathrow and for aesthetic reasons. There may need to be more emphasis on infrastructure requirements.</p> <p>20.3 On a personal note, speaking as a former RAF Navigator, although it is stated that there are no heritage considerations, it would be nice to have a memorial plaque.</p>	<p>Noted.</p> <p>The concerns raised are already addressed in the SPD.</p> <p>The SPD has been amended in para 3.4 to refer to heritage considerations.</p>
<p>21.0 <u>Mrs Karen Hayes</u></p> <p>21.1 I feel the percentage of three and four bedroom houses should be much higher and also made more easily available to Hillingdon residents who have connection with West Drayton. Decent size shared equity houses need to be built for families. Far too many tiny two bed flats are built in West Drayton and Yiewsley with families crammed into them often with two or more children and no proper garden space. People need large family homes with their own garden space.</p>	<p>The SPD sets out a housing mix to encourage a high percentage of family housing, with large back gardens and quality facilities and open space.</p>
<p>22.0 <u>Mr Chris Bigos</u></p> <p>22.1 Front Cover - The outline of the site is incorrect as it includes the Air Cadet facility in the northeast corner. The map on page 41 shows the correct outline in that the Air Cadet facility is external to the former NATS site.</p> <p>22.2 Section 2.1 - There is a reference to 'Area A' on map 2, but there is no Area A marked on map 2.</p> <p>22.3 P8, Map 2 - The red outline of the site is incorrect as it should not include the Air Cadet facility in the northeast corner. The map on page 41 shows the correct outline.</p>	<p>The relevant maps have been amended to exclude the ATC facility from Area A.</p> <p>The reference to Area A has been deleted from para 2.1.</p> <p>The map has been updated to ensure that the ATC facility is identified in Area C.</p>

<p>22.4 Section 2.10 - Area C should also include the Air Cadet facility owned by the Ministry of Defence.</p> <p>22.5 P10, Map 3 - The red outline of the site is incorrect as it should not include the Air Cadet facility in the northeast corner. The map on page 41 shows the correct outline.</p> <p>22.6 Section 2.11 - States “The only facility that remains on the site is the Air Cadet facility”. This is incorrect as the Air Cadet facility is not part of the site sold to Inland Homes. It remains Ministry of Defence property and is physically separated from the Inland Homes site by a security fence. The Air Cadet facility benefits from a legal right of way across the Inland Homes site to Porters Way.</p> <p>22.7 Section 2.12 - The site is also bordered to the east by the Air Cadet facility in Rutters Close. [The address of the Air Cadet facility is 49 Rutters Close.]</p> <p>22.8 Section 2.14 - Area C should include the Air Cadet facility.</p> <p>22.9 Section 2.15 - The list of facilities within 400 metres should include the Air Cadet facility in Rutters Close.</p> <p>22.10 P13, Map 4 - The red outline of the site is incorrect as it should not include the Air Cadet facility in the northeast corner. The map on page 41 shows the correct outline.</p> <p>22.11 Section 2.39 - States that IBA land is identified on Map 4 above. It is actually identified on Map 4 below. There are two Map 4s, one on page 13 and one on page 23.</p> <p>22.12 P23, Map 4 - The red outline of the site is incorrect as it should not include the Air Cadet facility in the northeast corner. The map on page 41 shows the correct outline.</p> <p>22.13 Section 3.18 - The Air Cadet facility has an unrestricted legal right of way for pedestrian and vehicular access across the site from Porters Way. The route of this right of way may be varied by agreement with the Ministry of Defence. The layout of the streets, both final and during construction, must take this into account. The right of way provides for large vehicles such as coaches and articulated trailers and this must be retained with any new access route.</p> <p>22.14 Section 3.37 - As the Air Cadet squadron covers a large catchment area the majority of staff live some</p>	<p>The relevant maps have been amended to exclude the ATC facility from Area A.</p> <p>Refer to point 22.4 above.</p> <p>Para 2.11 and 2.14 have been amended accordingly.</p> <p>Para 2.12 has been amended accordingly.</p> <p>Para 2.14 has been updated to include the Air Cadet facility.</p> <p>Para 2.15 has been updated accordingly.</p> <p>Map 4 has been updated to amend the boundary.</p> <p>The map numbering has been amended to ensure there is no confusion.</p> <p>Map 4 has been amended accordingly.</p> <p>Para 3.18 has been expanded to ensure this point is made clear.</p> <p>The management of public parking spaces in this way is not considered</p>
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<p>distance away and travel by car. Historically the adult volunteer staff have used the generous concrete hard standings adjacent to the Air Cadet facility for car parking on parade nights (two evenings a week). There is sufficient space within the facility for car parking on the occasional staff attendance outside these times, but not on parade nights. The number of parking spaces needed is 6-8. If some of the public parking spaces on the developed site were reserved for Air Cadet staff just on parade nights there would not be an issue, and perhaps this requirement could be added to this 'site specific issues' section. Such spaces do not need to be immediately adjacent to the Air Cadet facility.</p> <p>22.15 It should be noted that Mayor of London's recently launched 'Time for Action' proposal includes developing the character and responsibility of London's youths through the Project Titan and Project YOU initiatives. These focus on enhancing the presence and membership of uniformed youth organisations such as the Air Cadets, including retaining or increasing adult volunteer numbers. A lack of suitable staff parking within reasonable distance of the facility would threaten this objective.</p> <p>22.16 Section 3.50 - The Air Cadet facility has a legal right of way across the site, and as such the Air Cadets are a key stakeholder in the construction travel plan. The plan must make adequate provision for the safety and amenity of the Air Cadets during construction.</p> <p>22.17 P41, Map 5 - "Air Corps Centre" in the key should be "Air Cadet HQ".</p> <p>22.18 Section 4.58 - It is stated that the Air Training Corp ('Air Cadets' is the preferred nomenclature) "will be retained on the site". It must be stressed again that the Air Cadet facility is not within the site boundary but external to it. The comments about appropriate development immediately adjacent to the Air Cadet facility are nevertheless still valid, as there is a shared boundary. The developers should be aware that Air Cadet parades involve the shouting of commands, including the final parade that takes place as late as 2200 hours. This has been taking place in this location since the 1960s and will continue into the future. There is also marching band practice from time to time.</p> <p>22.19 Section 5.20 - The comments above are paragraph 4.58 may also be relevant here.</p> <p>22.20 Section 5.42 - Inland Homes have an obligation to maintain the existing wastewater (sewage) service to the Air Cadet facility until such time as it can be connected to the wastewater infrastructure of the new development. The planning of underground services must take this into</p>	<p>to be appropriate by means of planning control.</p> <p>Noted.</p> <p>Noted.</p> <p>Map 6 (formerly map 5) has been amended.</p> <p>Para 4.58 has been amended to reflect that the ATC is outside the development site.</p> <p>Para 5.20 has been amended to refer to the noise issues.</p> <p>Noted.</p>
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<p>account.</p>	
<p>23.0 <u>Mr Michael Goodall</u></p> <p>23.1 The site currently contains several tens of thousand tons of buildings that need to be demolished. These have been built over many years and of different construction methods including asbestos - can be seen from the satellite pictures and substances that cannot.</p> <p>23.2 The very nature of the building use and its design will surely uncover problems not experienced before.</p> <p>23.3 Apparently munitions may still be stored on site in underground locations from many years ago</p> <p>23.4 These buildings also may run deep underground i.e. nuclear bunkers.</p> <p>23.5 This will involve many thousands of lorry movements and plant brought to site to remove this before building can commence for the first house.</p> <p>23.6 How is this all to be recycled as per the document,</p> <p>23.7 How safe will properties be from subsidence where underground buildings have to be filled in and the land settled - (a grave has to settle for a year before you can put headstones on it and that's only 6 foot deep.)</p> <p>23.8 How will the water table be affected?</p> <p>23.9 How will the drains cope - already there are fous sewer smells in Porters Way from the only partially completed St Georges site when you walk down the street.</p> <p>23.10 There surely must be a duty of care to existing residences. How is this to be achieved without disturbing the locality during the demolition process?</p> <p>23.11 Can the question of how running a car parking</p>	<p>Noted.</p> <p>Noted. Council officers will be considering the relevant concerns regarding demolition.</p> <p>Officers are unaware of any munitions being stored underground at the site.</p> <p>Officers are aware that there are large areas of basement and sub basement level.</p> <p>A construction management plan will be required to support the planning application for the site, and this will contain all relevant details. Para 3.49 provides guidance on construction traffic issues.</p> <p>Refer to Para 23.5 above.</p> <p>These issues will be considered through the planning/building control applications.</p> <p>The environmental impact assessment will provide details of all likely impacts. This will be scrutinised by the Council and the Environment Agency in relation to impacts on the water table.</p> <p>Thames Water and the Environment Agency have already provided comments on this draft SPD and will be involved through the planning process to ensure all issues are properly addressed.</p> <p>Whoever undertakes the demolition will need to comply with all relevant regulations.</p> <p>Detailed studies will need to be</p>

<p>airport transfer business on this site is legally allowed when the site has been sold on condition of residency and small business units(LBU). Are they paying council business taxes - is this site now registered as a business, where was the application for this transfer of use publicised?</p> <p>23.12 Who has a declared interest in this business until consultancy process has been completed? This is currently a 24x7 operation with over 500 cars parked on the site which as part of the doc 3.50 states that there will be a cap on the site for parking for the construction phase. I would classify this business as storage which is not allowed for as part of 4.2 in the main document and so surely this operation is in breach of all conditions.</p>	<p>submitted by the developer of the site to support any planning application. This will also be available for public comment.</p> <p>Inland Homes are the owners of the site. The Council is currently considering enforcement action and dealing with a planning application which seeks permission to use part of the site for car parking.</p>
<p>Internal</p>	
<p>24.0 EPU – Contamination</p> <p>24.1 The document covers the relevant areas regarding land contamination including consideration of neighbours during demolition/construction and reusing and discarding unsuitable wastes. My only comment is the line relating to Model Procedures could be put more clearly in paragraph 5.22 as follows: <i>The Model Procedures for the Management of Land Contamination (CLR 11) also provides guidance for developers, professional advisers and regulators in dealing with potentially contaminated land, and this will be utilised in assessing any planning application.</i></p>	<p>Para 5.22 has been amended accordingly.</p>
<p>25.0 Housing</p> <p>25.1 This tenure mix should be based on the WLHPIG 2008-11 which is still current.</p> <p>25.2 We require all the affordable housing dwellings irrespective of tenure to comply with code for sustainable homes level 4. The building regulations are changing in April 2010, so it will become much harder for developers to get away with code 3.</p> <p>25.3 All affordable housing units to comply with CABE "building for life" and Design and Quality Standards 2007.</p> <p>25.5 Our planning policy is to ask for 50% affordable housing on all development sites capable of producing 10 or more units. With the amount of affordable housing around the area (St George development 574) and the concentration of council estates it is advisable to give some thought to the requirement. Our view is that we would want a sustainable community on the site and the only way of achieving this balance is to reduce the level of</p>	<p>Noted.</p> <p>Noted. Para 4.12 refers to the Code for Sustainable Homes and aspirations to achieve as high a level as possible.</p> <p>Noted.</p> <p>Para 4.13 has been amended to refer to the CABE standards.</p>

<p>affordable housing and change the tenure mix.</p> <p>25.6 The current Council guidance states that there should be a 70:30 split between tenure. As explained before there are already high levels of rented housing in the area and therefore we could explore options for a 50:50 split in tenure. Within the 50% intermediate split we would encourage the developer/RSL to explore different low cost housing options with Council.</p>	<p>These comments are already included in para 4.19 – 4.23 of the SPD.</p>
<p>26.0 <u>Green Spaces</u></p> <p>26.1 Other than the comments below, we are happy with rest of the document.</p> <p>26.2 Para 2.15 lists facilities within 400 metres. This should not include a Sports Ground. Holly gardens is a public open space with a set of goal posts upon it for informal 'kick about', and not a Sports Ground.</p> <p>26.3 Para 5.6 - Trees Landscape and Ecology. The document does not mention Bats. There may be bats / bat roosts present in the mature trees or buildings on site, a bat survey should be carried out. Bat bricks should be considered for inclusion within some of the new structures. Para 5.8 - Surveys should be carried out at the correct time of year when species are active i.e. not during winter.</p>	<p>Noted.</p> <p>Para 2.15 has been amended accordingly.</p> <p>A full bio-diversity assessment is required as stated in para 5.8 of the SPD. This will ensure that all species such as bats are identified and any mitigation measures provided.</p>
<p>27.0 <u>Landscape Architect</u></p> <p>27.1 Loss of Chestnut Trees (along Porters Way) - A robust tree / landscape justification and compensation / mitigation for the landscape and visual impact will be required. The landscape of the road frontage could reflect the landscaping on the adjoining St George's site.</p> <p>27.2 Wildlife Corridor (Northern boundary) - The treatment of this area, including any fencing, planting specifications and other details would be required to support the planning application.</p> <p>27.3 Additional Tree Planting (Rear gardens) – Any Masterplan should illustrate tree planting to rear gardens to provide screening and vegetation between the residents, and add to the garden village character of the site.</p> <p>27.4 Hierarchy of routes through the site - A clear concise and annotated plan illustrating the pedestrian and vehicular links throughout the site should be provided.</p> <p>27.5 Main Drainage / Service Routes - The Masterplan shows strong tree-lined connections / routes throughout the site and presumably these are also likely to be required for main service runs, water, sewer, electricity</p>	<p>This is already included in the paras 5.6 and 5.7 of the SPD.</p> <p>As above.</p> <p>As above.</p> <p>This will be a requirement at the planning application stage.</p> <p>Noted.</p>

<p>and the like. Through the planning stage we need to ensure that the tree planting is feasible / compatible with essential underground utilities.</p> <p>27.6 Security / Footpath Networks - Several of the residential / parking courtyards are intersected by many footpaths which could become a security problem. These need to be carefully designed / managed to reduce the risk of crime.</p> <p>27.7 Phasing of Development / Advance Structure Planting - An indication of likely phasing of the development will be required together with the identification of opportunities for advance tree / structure planting where possible.</p> <p>Defensible Space - Some form of spatial separation, screening and / or security is required and landscaping treatment will be a component of this. Such details should be illustrated to support a planning application.</p> <p>Shading caused by tall buildings - Shadow diagrams will be required to clearly illustrate the degree of shadow cast on amenity space (and other buildings), particularly the larger buildings. At this stage every effort should be made to mitigate against any adverse impacts on landscaping, vegetation and the other issue that this raises.</p> <p>Children's play areas - A clear strategy / design guidelines will be required for the siting and content of appropriate facilities, including details for uses and facilities for different age groups, throughout the site.</p> <p>Public open space - Detailed illustrations are required to ensure that a range of attractive, distinctive and useable open spaces are provided throughout the site, in accordance with relevant guidelines.</p> <p>Protection of public open spaces - Detailed illustrations are required to show how the boundaries of public open spaces will be defined and protected from unplanned parking / vehicle overruns and to protect/shelter the park users, whilst also achieving secured by design standards.</p> <p>High quality landscape materials - A palette of hard and soft landscape materials and specifications should be developed at this stage to ensure that the detailed design meets the high quality objectives of the masterplan. Council officers would be able to comment on these details when they are submitted.</p>	<p>Noted.</p> <p>This will be a requirement at the detailed planning application stage.</p> <p>As above.</p> <p>This will be a requirement at the planning application stage.</p> <p>As above.</p> <p>As above</p> <p>As above.</p> <p>As above.</p>
<p>26.0 <u>Response to Questionnaire</u></p> <p>26.1 2400 questionnaire/leaflets were delivered to surrounding residents, placed in the local libraries, and</p>	

made available at all public meetings, and in the Hayes One Stop shop and Planning reception in the Civic Centre, Uxbridge. 194 responses were received, and a summary of the responses are included below:

Q1 What could go on the site?

26.2 Housing

a. A total of 600-800 new homes - 70% strongly agree, 12% tend to agree, 3% tend to disagree and 14% strongly disagree

b. A mix of flats and larger family houses with gardens – 67% strongly agree, 20% tend to agree, 3% tend to disagree and 9% strongly disagree

c. 50% affordable housing, to include 70% for social rent – 4% strongly agree, 7% tend to agree, 4% tend to disagree and 85% strongly disagree

d. 30% of affordable housing to be at sub market prices – 23% strongly agree, 53% tend to agree, 10% tend to disagree, 13% strongly disagree and 1% no opinion

e. Specialist housing for the elderly – 66% strongly agree, 27% tend to agree, 2% tend to disagree, 3% strongly disagree and 2% no opinion

26.3 Community Facilities

a. A GP Surgery on site – 89% strongly agree, 8% tend to agree, 1% tend to disagree, 1% strongly disagree and 1% no opinion

b. A children's nursery – 18% strongly agree, 13% tend to agree, 12% tend to disagree, 43% strongly disagree, 15% no opinion

There is general acknowledgment that new housing is the best use of the site.

There is general agreement that any housing for the site should include housing with back gardens.

89% of respondents feel that there is too much social housing in the local area already. Almost half of all written responses on the supplementary questions elaborated on this point, stating that social housing should be restricted, with many suggesting 20% as a limit.

76% of respondents agree that there should be housing for intermediate or 'key workers'.

93% of respondents agreed with the proposal to provide specialist housing for the elderly and therefore the SPD maintains the requirements for specialist housing.

There is overwhelming support for additional health facilities in the area. At public meetings and the exhibition this topic was consistently raised and there is a clear demand for improved health facilities. The SPD therefore maintains the requirements for health facilities on the site, and s106 contributions as appropriate.

A majority of residents disagreed with the need for children's nursery on the site. Anecdotal evidence and some written responses indicate that this is due to concerns about the impacts on existing nurseries in the locality.

<p>c. A community centre – 21% strongly agree, 6% tend to agree, 10% tend to disagree, 54% strongly disagree, 9% no opinion</p> <p>d. A police safer neighbourhood centre – 27% strongly agree, 6% tend to agree, 11% tend to disagree, 44% strongly disagree and 11% no opinion</p> <p>e. Improvements to open space and children’s playgrounds – 84% strongly agree, 11% tend to agree, 1% tend to disagree, 2% strongly disagree and 2% no opinion</p>	<p>There is mixed support for a community centre on site.</p> <p>A large proportion of respondents strongly disagree that there should be a police safer neighbourhood on site.</p> <p>Only 3% of residents disagree with providing improvements to open space and children’s playgrounds. It is essential that children’s playgrounds are provided or improved and this is outlined in the SPD.</p>
<p>26.4 Commercial & Employment</p> <p>a. Protect and enhance existing shops on Mulberry parade – 91% strongly agree, 5% tend to agree, 2% tend to disagree, 2% strongly agree and 1% no opinion</p> <p>b. Some new local shops – 44% strongly agree, 33% tend to agree, 11% tend to disagree, 10% strongly disagree, 1% no opinion</p> <p>c. Some local employment uses – 42% strongly agree, 43% tend to agree, 10% tend to disagree, 2% strongly disagree and 4% no opinion</p>	<p>91% of respondents strongly agree that the existing shopping parade should be protected and enhanced.</p> <p>77% of residents agree that some new local shops could be provided, though clearly not at the expense of the shops at Mulberry Parade as detailed above.</p> <p>85% of respondents believe there should be some local employment uses on the site.</p>
<p>26.5 Transport</p> <p>a. Vehicular access from Porters Way – 80% strongly agree, 8% tend to agree, 7% tend to disagree, 4% strongly disagree and 2% no opinion</p> <p>b. Limited vehicular access from Rutters Close – 63% strongly agree, 15% tend to agree, 3% tend to disagree, 15% strongly disagree and 3% no opinion</p> <p>c. Improved pedestrian and cycle links on and around the site, especially to the town centre – 86% strongly agree, 10% tend to agree, 1% tend to disagree, 2% strongly disagree, 2% no opinion</p>	<p>88% agree that vehicular access should be from Porters Way.</p> <p>A small percentage strongly disagree there should be access from Rutters close. This issue will need to be addressed through the planning process.</p> <p>96% of respondents agree there should be improved pedestrian and cycle links around the site and this is reflected in the SPD at paras 3.44-3.46.</p>
<p>26.6 Q2 <u>Do you generally agree or disagree with the details in the draft supplementary planning document?</u></p> <p>13% strongly agree, 56% tend to agree, 14% tend to disagree, 15% strongly disagree, 3% no opinion</p>	<p>69% of respondents generally agree with the details of the SPD. This</p>

<p><u>26.7 Q3 Do you generally agree or disagree that the site should include...</u></p> <p>a. 'Green energy' produced on site – 33% strongly agree, 57% tend to agree, 4% tend to disagree, 2% strongly disagree and 4% no opinion</p> <p>b. Significant water conservation measures – 34% strongly agree, 55% tend to agree, 7% tend to disagree, 2% strongly disagree and 3% have opinion</p>	<p>support is welcomed, and where there are concerns these have been addressed above.</p> <p>The overwhelming support for the need to produce green energy on site is reflected in the SPD, particularly 5.30-5.33.</p> <p>The significant support for the need to incorporate water conservation measures into any scheme are reflected at para 5.41-5.44.</p>
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There were also a number of suggestions on other topics in response to the questionnaire which have been summarised below.

26.8 Q4 Are there any other ideas for uses, buildings and facilities that should be included?

- a. Leisure centre with swimming pool and gym for disabled people (2 responses)
- c. Bank/Post Office (1)
- d. There should be a new medical centre and more GP's and dentists (12)
- e. Fire station (1)
- f. Police station (3)
- g. School (7)
- h. Retain existing buildings and open space for community uses (3)
- i. Recycle building materials (1)
- k. Leisure centre with discounts for local residents (1)
- l. Car share scheme (1)
- m. Sports facilities for all ages and abilities (1)
- n. Trees (2)
- o. Playground for disabled children (1)
- p. Parking (2)
- q. Eco-friendly housing (1)
- s. There should be a park and nature reserve (5)**
- u. Children's play area (3)

- v. Sheltered housing for elderly (3)**
- w. Nursery school (2)**
- x. Cycle links (1)**
- y. New shops (1)**
- z. Display giving history of NATS site (1)**
- aa. Hospital (1)**
- ab. Low maintenance gardens (1)**
- ac. Youth Club (5)**
- ad. Parent training facilities (1)**
- ae. Old people's home (2)**
- af. Community centre (1)**
- ag. New buildings for the Air Training Corp (1)**
- ah. Houses as well as flats (1)**
- ai. Indoor pool, gym and sports facilities (1)**
- aj. Plenty of green space where children can play (1)**
- ak. Keep RAF cadets meeting house (1)**
- al. Police safer neighbourhood centre (2)**
- am. Large community facility on site (2)**
- an. Large bridge that closes (?) Great Western Yiewsley (1)**

26.9 Q5 Are there any proposal that you do not agree with?

- a. There is an oversupply of affordable housing in the area, and aiming for 50% on this site is way too much (3)**
- b. No vehicular access though Rutters Close (4)**
- c. There should be no new houses (17)**
- d. The development of RAF West Drayton [St George scheme] has already destroyed the skyline (1)**
- f. Pedestrian and cycle routes are proposed around the site without door to door consultation (1)**
- g. Not enough schools for too many properties (6)**

Flats (5)

- h. Access to the shops or station will turbulence already existing on Holly Gardens estate (1)**
- i. Larger home (1)**
- j. West Drayton overpopulated without enough amenities (1)**
- k. There should be no bars, nightclubs, pubs or off licences (1)**
- m. There should be no mosques permitted on the site (1)**
- n. There should not be any employment or industrial uses, especially to the rear of the site (2)**
- p. Bad tenants of social housing should be evicted and houses given to local people (1)**
- q. Not larger housing – small private housing instead (3)**
- r. 50% social housing is too much (59)**
- s. A nursery is not needed on this site (3)**
- u. Majority of housing should be family houses (1)**
- v. Housing should not be given to students, single mothers and people from social housing (1)**
- w. Need less affordable housing (8)**
- x. No social housing at all (7)**
- y. Need to consider the impact of social housing (1)**
- z. Improve existing community centres – not new ones (3)**
- aa. Housing should be for local people first (1)**
- ab. Already have a police station so don't need one (1)**

26.10 Q6 Any other comments

- a. There should be regular rounds of police, preferably on foot (1)**
- b. Stockley bypass junction is congested (2)**
- c. There should be no more development (1)**
- d. We would like to see plans for vehicular access that include Porters Way and Bellfarm Est, also road to be used for Stockley Road. Lavender Rise? (1)**
- e. The proposals are good (2)**

- f. There should be substantial improvements to the existing park opposite Mulberry Parade (1)**
- g. Improvements to public transport needed (1)**
- h. More housing for British locals (2)**
- i. Houses with gardens needed (1)**
- j. Local primary school will be unable to cope with intake from new development (4)**
- k. Question over where the GPs and police will come from (1)**
- l. Traffic concerns (7)**
- m. Re-direct lorries away from Lavender Rise (1)**
- n. Traffic impact assessment has not been done for this SPD.**
- o. Junction of Porter's Way and Station Road needs addressing. (1)**
- p. Good that names and addresses were not asked for on questionnaire (2)**
- q. Need enough parking (18)**
- r. Bell farm centre is sufficient so no need for a new one (4)**
- s. More vehicular access (1)**
- t. Traffic problems outside the school (1)**
- u. Worries over footpath from NATS estate onto Holly gardens (1)**
- v. Build a better supermarket in the area (1)**
- w. Look at the schools and intake (3)**
- x. Another access for cars; keep construction traffic out of Bell Farm Estate (1)**
- y. No housing for immigrants and asylum seekers (3)**
- z. Spend money on police (1)**
- aa. Resent use of term 'affordable' because people think it means affordable to buy (1)**
- ab. Don't bring in any more shops because shops on Mulberry Parade are struggling (2)**
- ac. Holly Gardens on all the bends should be double yellow lines and so should West Drayton primary school on the school side (1)**
- ad. Must keep Inland Homes to the promises of a medical centre and care home (1)**
- ae. Rather than neighbourhood police centre, have police on the beat instead (1)**

- af. Discounted prices for young people who will look after their homes and respect their neighbours (1)**
- ag. The green opposite the shops on Mulberry Parade should be included in the council's overall plan for the area. (1)**
- ah. Housing associations have failed to deal with bad tenants and the council must only use good associations that know how to work with locals and police. (1)**
- ai. Try to stop vandalism (1)**
- aj. Liked Inlands scheme at their exhibition (1)**
- ak. West Drayton needs a proper police station not a neighbourhood centre (1)**
- al. Concerns over increased crime (1)**
- am. Homes for local people only (1)**
- an. Coffee bar for teenagers (1)**
- ao. Frustrating over St George development (3)**
- ap. Inlands Plans were in greater detail (1)**
- aq. A local decision not one from the government minister (3)**
- ar. Issues with parking down North Road (2)**
- as. Clear restrictions on use of Rutters Close during building works and afterwards (1)**
- at. CCTV at key locations to deter disruptive behaviour (1)**
- au. Stop commuter parking (1)**
- av. Stop Rutters Close being used as overflow parking during and after works (1)**
- aw. Traffic - problem. Link Porters Way directly to Stockely By-Pass (2)**
- ax. Expand existing schools (1)**
- ay. Plenty of parking for residents on site (1)**

