Former NATS site, Porters Way, West Drayton Supplementary Planning Document

GREAT WESTERN RAILWAY

St George scheme under construction

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September 2009

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1 Introduction

The purpose of the Supplementary Planning Document

1.1 The purpose of the Supplementary Planning Document (SPD) is to provide planning guidance for the future use and development of the land illustrated on Map 2, being the former RAF West Drayton/headquarters of the National Air Traffic Services Control (NATS) site, along with the adjoining Council owned land and consideration of the wider area. The SPD will provide guidance on the extent and form of development that may be considered acceptable, and the desirable uses for the site. The SPD process encourages the engagement of the local community in the planning process. This then ensures that the Council can incorporate the comments and ideas from the community into a planning document that will become a material consideration in making planning decisions. The process also engages local residents early in the preparation of ideas and plans for the site, which is important to add value to any redevelopment, and the long term success of creating sustainable communities.

Policy Rationale

1.2 The statutory basis for the preparation of the SPD is London Plan Policy 3A.7 (Large Residential Developments)which states that:

"Boroughs should prepare planning frameworks for all large residential sites of 5 hectares or more, or that are capable of accommodating more than 500 dwellings. The planning frameworks should be prepared in consultation with local communities and other key stakeholders."

1.3 The NATS site available for redevelopment has an area of 12.**56**72 ha, and the proposal is envisaged to include more than 500 dwellings.

1.4 The Council adopted an SPD for Porters Way in 2005, which covers the NATS site. **However**, it is considered essential to update and refine the SPD in accordance with the most recent legislation and policy advice, and to ensure relevant stakeholders are engaged in the process, particularly the GLA, other authorities and the local residents.

1.5 There have been various changes to legislation, planning policy and guidance since 2005, and this will need to these have been incorporated into the updated Supplementary Planning Document. Of particular relevance to this site is the change in the general approach to planning and decision-making, as expressed by the Mayor of London. *The Proposals for the Mayors London Plan*, released 29 April 2009, state that:

On too many occasions in the past the clamour to achieve the maximum permissible densities has been the overriding concern for many new developments, sometimes to the detriment of their surroundings, existing environments and local social infrastructure.

1.6 The Mayor expects that quality concerns will influence all development in London no matter the size. Due to the development pressures on the site, the Council is proposing to update the Porters Way Planning Brief of 2005, and intend tohave engaged the **local** community through consultation on the draft Supplementary Planning Document.

1.7 The SPD has been prepared within the context of the Hillingdon Unitary Development Plan Saved Policies September 2007 and other agreed Council standards, along with regional and national guidance. **It complies** In due course it will comply with Local Development Framework (LDF) requirements by being adopted as a Supplementary Planning Document, providing supplementary planning guidance held to be a material consideration in the assessment of any planning application. The SPD will also help to realise a number of objectives of Hillingdon's Sustainable Community Strategy.

1.8 Due to the development pressures on this site, the SPD has been brought ahead of other relevant overarching draft Local Development Framework (LDF) documents.

The components of the SPD

1.9 This draft SPD is intended to update the guidance in accordance with the latest legislative changes, policy advice and planning guidance. The SPD comprises:

- The Supplementary Planning Document which is to provide planning guidance for the site.
- The Sustainability Appraisal (SA) which evaluates the SPD and ensures it meets the government's wider objectives for sustainable development. This can be viewed as a separate document.

The consultation process

1.10 In accordance with relevant legislative guidance, early public involvement was sought through a consultation programme on the previous planning documents in 1994 and again in 2005. In accordance with PPS 12, the updated SPD willhas again

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been subject to community consultation, and the Council are aiming to engage the local community to ensure their expectations are expressed in the planning document. This has ensuredwill ensure that the local community have a say in the type and form of development that occurs on the site to inform the planning process, with regard to the determination of any relevant planning applications.

1.11 At the meeting of 28th May 2009, Cabinet agreed to approve the draft Supplementary Planning Document (SPD) for public consultation. The draft SPD and its accompanying Sustainability Appraisal (SA) were then placed on public exhibition for a period of 6 weeks from 1st of July to 12th August 2009. The consultation period was advertised and notified in accordance with the Council's Statement of Community Involvement (SCI), as detailed below.

A statutory advertisement and a ¹/₄ page colour advertisement appeared 1.12 in the Uxbridge Leader on Wednesday 1st July, along with a 1/4 page colour advert and a short article in the Uxbridge & West Drayton Gazette. A total of 1,798 leaflets/questionnaires were delivered to residents and businesses surrounding the site. All elected members (64) were posted a letter explaining the consultation process and an accompanying CD-ROM, with a hard copy of the SPD, SA and consultation documents delivered to the group offices, with additional hard copies delivered upon request. A letter and CD-ROM was sent to local MP's (total of 3), along with members of the Local Strategic Partnership (LSP) (total of 27), and nature conservation groups (13). An email was also sent to our database of interested people (total 323) with instructions and links to the planning documents. Additional questionnaire/leaflets were delivered to other groups upon request, and were also made available at all public meetings held during the consultation period. All statutory consultees (a total of 95 as listed in Appendix B of the Council's adopted Statement of Community Involvement) were sent a letter explaining the consultation process and a CD-ROM containing the planning documents (SPD, SA and consultation summary), and this was followed up with phone-calls and e-mails. A meeting was held with the key stakeholders, the Greater London Authority (GLA), Transport for London (TfL), Environment Agency (EA), and further correspondence with a number of other key Government agencies including English Heritage, Natural England and others. In addition, copies of the documents were also placed at the borough libraries, Hayes One Stop Shop and the Civic Centre (Planning Reception). The draft documents were also placed on the Council's website. An 'Open House' (invitation to speak to Council staff) was held at the Bell Farm Christian Centre on Thursday 16 July 3.30 – 7.00pm and Saturday 18 September 10.00am – 1.30pm and attended by around 30 people.

1.13 Officers also met with the Youth Council, Mobility Forum, FORCe group, and the Local Strategic Partners (LSP) Executive. A public meeting was also hosted by MP John McDonnell and attended by the project officer to discuss the draft SPD and the proposals for the site. The various public meetings were relatively well attended and were very valuable in gaining feedback on the draft

planning document and proposals for the site and the wider area. All submissions and comments made at public meetings have been considered in refining the SPD, and various amendments have been made to the draft SPD as a result of the consultation.

1.14 A total of 23 written responses have been received, in addition to a total of 194 questionnaire responses from residents. The majority of responses supported the SPD and the expected development of the site. Some concerns were raised and these include impacts on the existing traffic network, and implications for Rutters Close, concerns about crime, safety and security in the area, impacts on infrastructure and services, requirements for community facilities, impacts during the construction phase, and that the proportion of social housing for the site should be lower than suggested in the draft SPD. In light of the submissions received appropriate amendments have been made to this SPD.

How to Comment on this Supplementary Planning Document

1.15 This is your chance to comment on the draft Supplementary Planning Document and the draft Sustainability Appraisal for the former National Air Traffic Services (NATS) site, Porters Way, West Drayton. These documents will be subject to a 6-week consultation period in accordance with the Council's adopted Statement of Community Involvement (November 2006). The Council will consider a report on the issues raised during the consultation and may make changes as appropriate before adopting the document. The SPD document, once adopted, will form part of the Local Development Framework (LDF) and will be a material consideration in determining planning applications.

1.16 The consultation period commences on Wednesday 1 July 2009 and ends on Wednesday 12 August 2009. All documents are available to view on the Council website www.hillingdon.gov.uk, at public libraries throughout the Borough (opening times can be viewed on the Council website), the Hayes One Stop Shop (Monday to Friday 8.30am – 4.30pm) and the Planning and Community Services Reception, Level 3, London Borough of Hillingdon, Civic Centre, Uxbridge, Middlesex UB8 1UW (Monday to Friday 9.00am – 5.00pm). Please note that all information will be available on request in Braille, large copy print, audio-cassette or in a number of different languages other than English.

1.17 Representations can be made in the following ways:

- Submit an on-line response (this is the easiest method) via http://hillingdon-consult.co.uk
- View the document at www.hillingdon.gov.uk under 'Have your say'.
- Comment on different sections of the document quickly
- Receive an acknowledgement immediately
- See what other comments have been made

- By email Idfconsultation@hillingdon.gov.uk
- You can also send the forms by fax on 01895 277 042, marked for the attention of the NATS consultation, 3N/02, Planning and Community Services, London Borough of Hillingdon, Civic Centre, Uxbridge, Middlesex UB8 1UW.

1.18 All responses must be received by 5pm 12 August 2009. Comments received after the end of the consultation period do not have the right to be considered. Representations may be accompanied by a request to be notified at a specified address of the adoption of the SPD.

1.19 We hope you take this opportunity to submit your views. Should you have any queries please do not hesitate to contact us on 01895 250230. You can also contact us by email at LDFconsultation@hillingdon.gov.uk

2 Site Background

Site history

2.1 The National Air Traffic **Services (NATS)**Control-site (Area A on map 2) and the adjoining former RAF West Drayton land to its west, **were previously**have been used for some considerable time by the military authorities butand were expanded significantly in the 1960s when it was decided to merge the functions of the Air Ministry and the Ministry of Aviation to create the Joint Control Centre on the site. Known as the Southern Area Traffic Control Centre, it allowed military flights over the UK to be monitored as well as all civil flights across the south east of England and was created in response to the major increase in air traffic.

2.2 Barrack accommodation, administration buildings and ancillary staff facilities were also constructed in the early 1960s to service the military functions of the site and these were located in the south west corner of the site. The**sesite of the** former RAF station barracks are currently being redeveloped by St Georges/Notting Hill Housing Trust for **a development of 574** residential flats. The built form and usage of the RAF site at West Drayton have been subject to numerous changes and alterations over the intervening 40 years as the needs and objectives of the operating authorities have changed.

2.3 The former RAF West Drayton was host to a military Air Traffic Control (ATC) centre co-located with the civil London Area and Terminal Control Centre (LATCC). London Air Traffic Control Centre opened at West Drayton in 1966. The last ATC functions ended in January 2008.

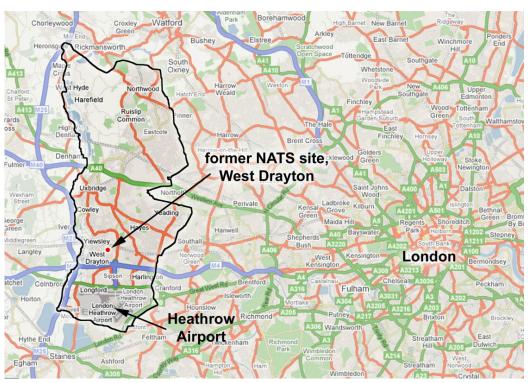
2.4 The National Air Traffic Service (NATS) site at West Drayton used to control air traffic over south-east England and all traffic going in and out of London's airports, and housed the computer that provided information to West Drayton controllers, along with controllers at Swanwick for flights in the rest of England and Wales.

2.5 This site played an important role in the development of RADAR. The British were the first to fully exploit it as a defence against aircraft attack, and the war precipitated research to further develop this new technology and find better resolution, more portability and more features for radar. The post-war years have seen the use of radar in fields as diverse as air traffic control, weather monitoring, astrometry and road speed control.

2.6 The National Air Traffic Control Centre is separated from the St Georges/Notting Hill Housing Trust site by a 5m wide security zone. This zone has no legal status now that the site has been vacated by the **RAF and** NATS.

Location

2.7 The site is located approximately 2.4km, north of Heathrow Airport, about 800 metres to the east of West Drayton Train Station, and about 1km east of the West Drayton Town Centre. The site has close proximity to the M25, M4, M40 and M3 motorways, and Stockley Business Park. It is situated just north of junction 4 of the M4 (Heathrow Airport spur) which intersects with the A408 (for Stockley Business Park), north for Uxbridge and it terminates south at Heathrow Airport itself. The nearby A3044 goes through Harmondsworth to the south. The site is served by Porters Way which links Station Road/Sipson Road (a Local Distributor Road) to the A408 Stockley Road (London Distributor) by means of Mulberry Parade and Lavender Rise.



Map 1 London context

2.8 West Drayton railway station provides rail links on the First Great Western Link service from London Paddington to Reading and Bristol. West Drayton rail station will be one of the stops on the new cross-rail development, and if it comes to fruition it would be possible to travel to Central London and Canary Wharf and beyond, via a direct route that will substantially reduce travel times. The site has a PTAL (Public Transport Accessibility Level) score of 1a -1b which is low, and this takes account of current accessibility factors such as footpaths, train stations, bus stops and frequency of services. Whilst the physical distance to West Drayton station may be only around 800m, this is not a direct route and the pedestrian environment is relatively unattractive to potential users for various reasons.

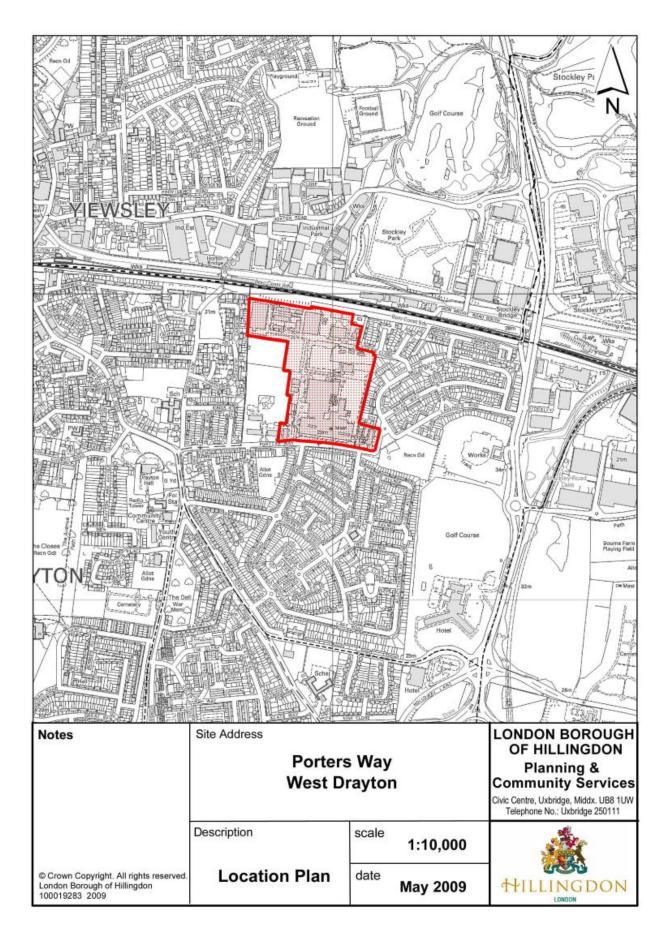
2.9 The SPD covers the existing local shops on Council owned property, site B, and this incorporates' twelve units of shops with flats above. Immediately opposite these shops is a public recreation ground and the surrounding area is predominantly

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medium-low density residential. The site falls within the 'western wedge' as identified in the London Plan, and is heavily influenced by Heathrow airport, in terms of economic activity, job opportunities and in many other ways with consideration of air quality, traffic and other implications. The site falls within the Heathrow Opportunity area and redevelopment needs to have special consideration to the surrounding environment, and particular reference to regeneration being pursued within the area.

Map 3 Site Description

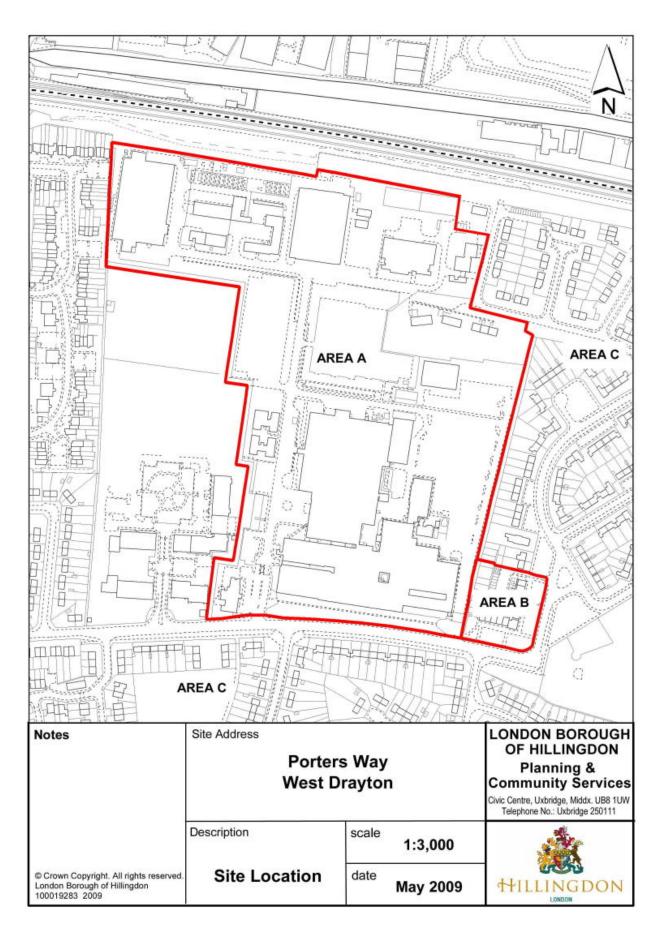


Description

2.10 For the purposes of this SPD, the site and its surrounds have been divided into 3 sub-areas, mostly for ease of reference and further consideration for development, and these are illustrated on Map 3 - Site Description:

- Area A: Land formerly occupied by National Air Traffic Services (NATS), including land designated as an Industrial and Business Area (IBA) in the adopted Hillingdon UDP. This site has been recently acquired by Inland Homes for redevelopment.
- Area B: Existing shops. This area is owned by the London Borough of Hillingdon and could be improved through appropriate redevelopment.
- Area C: The surrounding area, which is predominantly residential. This includes the former RAF West Drayton site that has been redeveloped by St Georges / Notting Hill Trust for 574 residential flats dwellings and associated infrastructure.

Map 3 Site Description



Characteristics

<u>Area A</u>:

2.11 Area A comprises 12.**56**72 ha of previously developed land, and was previously occupied by National Air Traffic Services (NATS) **headquarters**. The site has recently been acquired by Inland Homes for redevelopment. The site has historically been used for training purposes and as a flight control centre. It is intensively developed with purpose built utilitarian buildings including an electricity generating station to the north, extensive car parking and hardstand areas, and some incidental open space spread across the site. In total about 45% of the area is covered by buildings and another 20% by hardstanding areas. NATS have consolidated their sites, vacated the Porters Way site, and subsequently sold the site to Inland Homes. The only facility that remains on the former NATS site is the Air Cadet facility, which is sited in the northeast corner.

2.12 Area A is bordered by Porters Way and residential housing to the south, the former RAF West Drayton site to the west, now **being** redeveloped for 574 flats, the Great Western Railway line running along an elevated embankment to the north, **the Air Cadet facility in Rutters Close**, and a mix of bungalows, two and three storey houses and flats along Rutters Close and Mulberry Crescent to the east, with a shopping and flatted development adjoining the south eastern corner (Area B). The site is predominantly flat with a linear group of mature Horse Chestnut trees located on both sides of the entrance off Porters Way, and several mature trees located on the main part of the site. There is also a substantial belt of vegetation located alongside the Great Western Railway line, which is a valuable screen and buffer, and the vegetation on the site is an important feature. Site access is **currently** from Porters Way with minor access off Rutters Close.

<u>Area B:</u>

2.13 Area B covers 0.56 ha and is currently in Council ownership. It consists of a mixed-use, three storey development with twelve shop units at ground floor and flats above. The age and condition of the units are such that they would benefit from appropriate improvements, with scope to provide greater benefit to the local community. Proposals for improvements to the retail services available could be accommodated. Site access is from Mulberry Parade.

<u>Area C</u>:

2.14 Immediately to the west of the site is land being redeveloped by St George / Notting Hill Trust for 574 dwellings, and associated infrastructure. The remaining surrounding area is made up of some bungalows though predominantly two and three storey buildings of semi-detached houses and flats. The area is predominantly medium-low density and has a relatively open, suburban character. **The Air Cadet facility is to the north-east of the NATS site, off Rutters Close.** Whilst the site is

within close proximity to the West Drayton town centre, and geographically close to Stockley Park and Heathrow airport, the transport links, particularly pedestrian and cycle routes are relatively unattractive and would need to be improved to capitalise on the opportunities that redevelopment in this location presents.

2.15 The following facilities are provided in the surrounding area, with distances provided **as a general guide as measured from the closest edge of the site**:

Within 400 metres

- Bus stop U5 service (Porters Way)
- Sports Grounds (HollyGardens)Air Cadet facility (adjacent Rutters Close)
- Drayton Hall/ West Drayton Centre (Youth Centre)
- Local Shopping Facility (12 units- Chinese takeaway, photo studio, post office, hair salon, general store, newsagent, pharmacy, estate agent, gift shop.)

Within 800 metres

- West Drayton Library
- Police Station (Sipson Road)
- West Drayton Primary School
- Churches
- Recreation Ground and Private Golf Course
- Public House
- Drayton Hall/ West Drayton Centre (Youth Centre)

Over 800 metres

- West Drayton Train Station
- West Drayton Town Centre
- Cherry Lane Primary School
- Longmead Primary School
- St Catherine's Primary School
- Holiday Inn Hotel
- St Matthew's Primary School
- Stockley Academy
- Harlington Secondary School
- Hayes Manor Secondary School
- **3** 5 Doctors Surgeries
- Yiewsley Pool
- Yiewsley Library
- Heathrow Airport

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Map 4 Aerial Photo

Planning history

2.16 The RAF site to the west of the former National Air Traffic Services (NATS) site was declared surplus to requirements by the Ministry of Defence, and in 1994 detailed planning permission was sought for residential development. There have been two further detailed applications for planning permission for residential development of this site, submitted in 2004 and 2005 as detailed below. With regard to the National Air Traffic Services site (Area A) there have been no recent relevant applications. With regard to Mulberry Parade, the shops and maisonettes were constructed in the 1950's and planning permission has been granted for the change of use of three units over the past five years from A1 (shops) uses to primarily A2 (financial and professional services) uses.

2.17 The planning application submitted in 1995 regarding the RAF site to the west of the NATS site related to 183 dwellings (incorporating 61 flats and 122 houses). On 15 February 1996 the former Hayes & Harlington Planning Sub-Committee resolved to approve the scheme. However, the section 106 agreement was not completed and the planning permission not issued. On 19 March 1999 it was resolved to take no further action on the application.

2.18 At the meeting of the Central and South Planning Committee on 9 November 2004 planning permission was refused (Ref. 5107/APP/2004/2179) for the erection of a residential development of 624 dwellings and associated infrastructure and facilities.

2.19 At the meeting of the Central and South Planning Committee on 14 April 2005 planning permission was refused (Ref. 5107/APP/2005/290) for the erection of a residential development of 594 dwellings, and associated infrastructure.

2.20 At the meeting of the Central and South Planning Committee on the 25 October 2005, planning permission was refused (Ref. 5107/APP/2005/2082) for the erection of a residential development of 574 dwellings, community and management suite, community police facility, open space, play areas, landscaping, new access to Porters Way and associated car, cycle and motor cycle parking on the site, for reasons relating to over-development, impact on character of the area, insufficient car parking, unsatisfactory housing mix and inability to create a balanced community on site.

2.21 An appeal was lodged against the decisions of 14th April 2005 and 25th October 2005, and the appeal was heard in January 2006. The Inquiry debated the merits of a 574 dwelling proposal and the considerations of the Secretary of State were:

- whether the proposed density and design was appropriate for the site; and
- whether the proposed housing mix provides sufficient homes with 4 or more bedrooms

2.22 On the first point the Secretary of State agreed with the Inspector that the proposed development would be acceptable in terms of its density (100-150 dwellings per hectare) and scale, and its effect upon the character and appearance of the area. It should be remembered that the scheme was at a density of 127 units per hectare and 340 habitable rooms per hectare.

2.23 On the second, the Secretary of State agreed with the Inspector that the Mayor's SPG and GLA Housing Requirements Study set a useful regional background to local housing needs requirements and housing market studies. The Secretary of State agreed with the Inspector that little weight should be given to the housing mix contained in the Porters Way Planning Brief and Policy DC43 of the LDF Core Strategy. The Secretary of State agreed with the Inspector that the Hillingdon Housing Needs Survey 2005 provided the most up-to-date evidence of the need for homes with 4 or more bedrooms - about 4% of total need. The Secretary of State agreed with the Inspector's conclusions that the number of 4 or more bedroom homes offered by the appeal proposals would be acceptable.

2.24 The appeal was allowed on the 30^{th} May 2006. Construction has since commenced on this site and the development is around $1/3^{rd}$ occupied at present.

Relevant Planning Policies

2.25 The Porters Way Planning Brief was adopted as supplementary planning guidance in November 1994. It related to land to the west of the NATS site and included a small part (north-west corner) of Area A. It required a high quality residential scheme to reflect the area's general character, and retain utilities and trees of merit and allow for future expansion onto the eastern part of the larger site. The brief also sought the maximum feasible proportion of affordable housing; provision of a children's play area; provision of suitably located and usable public open spaces; provision of a community centre; provision of traffic lights at the Station Road/Porters Way junction; a comprehensive scheme of planting and landscaping as an integral part of and as an enhancing and complementary setting for any new development in relation of adjoining sites; and a contribution to local traffic calming measures.

2.26 The previous Porters Way Planning Brief of 1994 was replaced by the Porters Way Planning Brief, adopted December 2005. The brief was updated in line with prevailing legislation and was expanded to cover the NATS site and surrounding area in order to guide future development, particularly in response to development pressures to bring forward the RAF West Drayton site for housing. However, as discussed previously, the SPD needs to be updated. There are a range of strategic policy documents, and local Council policies that have been prepared adopted since 2005 that need to be reflected in any policy guidance for the site.

Key Strategic Policy Guidance

Planning Policy Statements and Guidance

2.27 The following are the key planning policy statements (PPS) and planning policy guidance, which influence the site proposals:

PPS 1 - Sustainable development states that sustainable development is the core principal underpinning planning and that planning should facilitate and promote sustainable and inclusive patterns of development.

Supplement to PPS 1 - Planning and Climate Change sets out how planning should mitigate against climate change through reducing greenhouse gas emissions, and also help in adapting to the already inevitable impacts of climate change. Tackling climate change is a key government priority for the planning system. Applications for planning permission will need to demonstrate how their proposals contribute to the government's ambitions and conform to planning guidance.

PPS3 - Housing outlines the Government's policy on housing with the key goal being to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. It sets out a number of key outcomes addressing quality and choice and the need for a mix of market and affordable housing.

PPS 4 - Industrial, Commercial Development and Small Firms sets out the Government's desired aims to promote economic development, subject to environmental and other considerations. It is likely that the current PPS4 will be superseded by the current draft PPS 4 prior to an application being determined for this site.

Draft PPS 4 – Planning for Sustainable Economic Development sets out the Government's priorities for how planning authorities should plan for economic development, whilst ensuring this is underpinned by sustainability objectives and robust evidence.

PPS6 - Town Centres states that the planning system has a key role in facilitating and promoting sustainable and inclusive patterns of development, including the creation of vital and viable town centres. The PPS promotes a plan led approach to direct development to existing town centres and to apply a sequential approach to site selection for town centre type uses.

Draft amendments to PPS 6 are expected to become a material consideration before any decisions are finalised on the development of this site. Draft PPS 6 amends the 'needs' test with a broader emphasis on economic, social and environmental impacts. An amended PPS 6 would be a material consideration for any planning application.

PPS9 - Biodiversity and Geological Conservation sets out the Government's planning policies on protection of biodiversity and geological conservation through the planning system. Amongst other matters, measures include the promotion of sustainable development by ensuring biological and geological diversity is conserved and, enhancement of biodiversity in green spaces and amongst developments.

PPS10 - Planning for Sustainable Waste Management requires more sustainable waste management, moving the management of waste up the 'waste hierarchy' of: Reduction; Re-use; Recycling and composting; Using waste as a source of energy; and, only disposing as a last resort.

PPG13 - Transport sets out the Government's objective to integrate planning and transport by promoting more sustainable transport choices, accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and reducing the need to travel, especially by car.

PPG15 - Planning and the Historic Environment sets out the Government's requirements for the protection of the historic environment as a key aspect of wider environmental responsibilities, and to be taken fully into account both in the formulation of local authorities' planning policies and in assessing planning applications.

PPG 16 - Archaeology and Planning gives guidance on how archaeological remains are to be preserved or recorded or both, and weight to be given to such considerations in planning for development and with regard to conditions placed on planning consents.

PPG 17 - Planning for Open space, Sport and Recreation sets out the government's priorities for the provision of open space and facilities and improving opportunities and accessibility for sport and recreation.

PPS 22 - Renewable energy outlines the considerations in planning for renewable energy production, and states that local authorities and developers should consider the opportunity for incorporating renewable energy projects in all new developments, particularly small scale schemes utilising solar, biomass, wind and Combined Heat and Power.

PPS 23 - Planning and Pollution Control outlines the requirement to consider potential impacts of development on the environment and human health from any development. This includes protecting the quality of air, water and land, and specific considerations for potentially contaminated land.

PPS 25 - Development and Flood Risk sets out the requirements to mitigate and adapt to the impacts of flooding, including as a result of climate change. The PPS includes requirements for a sequential approach to site selection for new development and the need to limit development in areas vulnerable to flooding, and gives specific guidance on preparing a flood risk assessment.

The London Plan (Consolidated with Alterations since 2004) 2008

2.28 The London Plan themes of strong, diverse long-term growth, socially inclusive and sustainable development are reflected in the proposals for the redevelopment of the site. Any development proposals will be expected to comply with all policies of the London Plan, and including specific policies within this SPD, does not exclude the wide range of relevant London Plan policies that need to be considered, however the following key policies are relevant to the redevelopment of this site:

Policy 5F.1 – The strategic priorities for West London - The site falls within the 'western wedge' regional co-ordination corridor, where there is significant influence from Heathrow airport and the need for a co-ordinated approach between Councils and stakeholders in this area.

Policy 4B.8 - Respect local context and communities – states that the Mayor and Boroughs should work with local communities to recognise and manage local distinctiveness. Engaging local communities in the development process will help ensure that new buildings and spaces are welcomed and respected by local people, as well as integrated with local built form.

Policy 3A.3 (Maximising the potential of sites) states that Boroughs should ensure that development proposals achieve the maximum intensity of use compatible with local context, the design principles in Policy 4B.1 and with public transport capacity. It identifies that the Mayor will refuse permission for strategic referrals that, taking into account context and potential transport capacity, under-use the potential of the site.

Policy 3A.7 (Large residential developments) establishes the requirement to prepare planning frameworks for large residential developments.

Policy 3A.10 (Negotiating affordable housing in individual private residential and mixed use schemes) requires Boroughs to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes, the need to encourage rather than restrain residential development and the individual circumstances of the site.

Policy 3C.2 (Matching development to transport capacity) states that proposals should be considered in terms of existing transport capacity, both at a corridor and local level. It outlines the requirement to ensure that development proposals are appropriately phased until it is known these transport requirements can be met. The cumulative impacts of development on transport requirements are required to be taken into account. Developments with significant transport implications should include a Transport Assessment and Travel Plan as part of planning applications.

Policy 3D.1 (Supporting town centres) states that Boroughs should enhance access to goods and services and strengthen the wider role of town centres. Amongst other matters listed it identifies to enhance the competitiveness and quality of retail and other consumer services in town centres, support a wide role for town centres as

locations for leisure and cultural activities, as well as business and housing and their key role in developing a sense of place and identity for sustainable local communities and require the location of appropriate health, education and other public and community services in town centres.

Policy 4A.3 (Sustainable design and construction) encourages development to meet the highest standards of sustainable design and construction. This sets out a number of objectives and requires a statement on the potential implications of the development on sustainable design and construction principles, including energy.

Policy 4B.5 (Creating an inclusive environment) requires all future development to meet the highest standards of accessibility and inclusion and that the principles of inclusive design should be used in assessing planning applications and in drawing up master plans and area planning frameworks.

2.29 A number of other specific policies are relevant and these are identified throughout this SPD. Other GLA Strategies and supplementary planning guidance are likely to affect detailed proposals and should be referred to as part of the planning process.

2.30 In May 2009 the Mayor of London published "**A new plan for London -Proposals for the Mayor's London Plan**" which sets out the key areas that he wants to address in revising the London Plan and other various planning strategies and guidance. Over the course of 2009 and beyond, a number of changes are expected to be made which will have implications for planning in London. In planning for the future development of RAF West Drayton, developers and decision makers will need to consider the most up to date policy guidance, emerging SPGs and other guidance. It is anticipated that policies regarding affordable housing, outer London borough's, climate change, accessibility, open space and other issues will be amended, which may affect the redevelopment of this site, prior to any decision being reached on any planning applications. The assessment of any planning application, to inform decision-making.

Key Local Planning Guidance

2.31 Development objectives for the site should be compatible with the key strategic documents, which include the emerging LDF Core strategy and the Community Strategy

Draft LDF Core Strategy Spatial Vision (March 2007):

2.32 "By 2017 Hillingdon will be one of the most successful and sustainable boroughs in West London where the population will be proud to live. The Borough will be a leader in:

• tackling the causes of climate change

- protecting and enhancing the natural and historic environment, and
- developing facilities which will ensure the borough's diverse communities are more accessible, healthier, inclusive, economically prosperous and safer."

Sustainable Community Strategy (2008 - 2018)

2.33 The Sustainable Community Strategy promotes the wider social, economic and environmental well being of Hillingdon as part of the achievement of sustainable development. It has three key components which underpin the strategy, and should form the objectives for development of this site:

People – "Planning Understanding and responding to the changing needs of our communities".

Place – "Making Hillingdon a safe, attractive and sustainable place to live, work and learn".

Prosperity – Prosperous individuals and prosperous communities.

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- **2.34** The priorities of the strategy are:
- Improving health and wellbeing Making Hillingdon a borough of excellent health, social care and housing, where all residents can enjoy fulfilling and happy lives
- Strong and active communities A borough where communities are strong and cohesive, and local people have a real opportunity to take an active part in local life, leisure and culture
- **Protecting and enhancing the environment** One of the greenest and most attractive boroughs in London, for current and future generations to enjoy
- **Making Hillingdon Safer** A safe borough, where residents are able to benefit from a full range of local amenities without fear of becoming a victim of crime
- A thriving economy Hillingdon will have a strong and vibrant economy, where prosperity and quality of life are high
- Improving aspiration through education and learning Hillingdon will raise attainment by increasing aspiration, and ensure that all residents, young and old, have the skills to prosper in the job market of today and tomorrow.

2.35 Local planning guidance is set out in the Hillingdon UDP Saved Policies (and where relevant London Plan (2008) requirements). Relevant UDP polices are cross-referenced in the appropriate chapters. Other documents are listed below:

Borough wide				
Hillingdon UDP Saved Policies - September 2007				
Air Quality Management Plan				
Supplementary documents:				
SPD	Affordable Housing			
SPD	Hillingdon Design and Accessibility Statements: Residential Layouts Hillingdon Design and Accessibility Statement: Accessible Hillingdon			
SPG	Supplementary Planning Guidance - Noise (LBH 2004)			
SPG	Supplementary Planning Document – Planning Obligations (LBH 2008)			
SPG	Supplementary Planning Guidance - Air Quality (LBH 2002)			
SPG	Supplementary Planning Guidance - Community Safety by Design (LBH 2004)			

Policy PR 8 (RAF West Drayton)

2.36 Policy PR8 (RAF West Drayton) is a site-specific policy that relates only to the former RAF West Drayton site and is not applicable to the redevelopment of the former NATS site. The policy refers to an area of approximately 6.5 hectares at RAF West Drayton adjoining the railway line to the north, the London Air and Terminal Control Centre to the east and residential properties to the west. The MoD has disposed of the site. Due to the effect any industrial or warehousing redevelopment could have on residential amenity, the site is not considered suitable for industrial or warehousing redevelopment.

2.37 Policy PR8 is set out below:

PR8 - Residential Development of land at RAF West Drayton as delineated on the Proposals Map is acceptable in principle subject to the policies of this plan and should take into account:

- The need for planned comprehensive redevelopment of the whole site;
- The immediate road system and improvements to the highway network; and
- The relationship of every part of the site to the surrounding environs and to any aviation facility which remains operational.

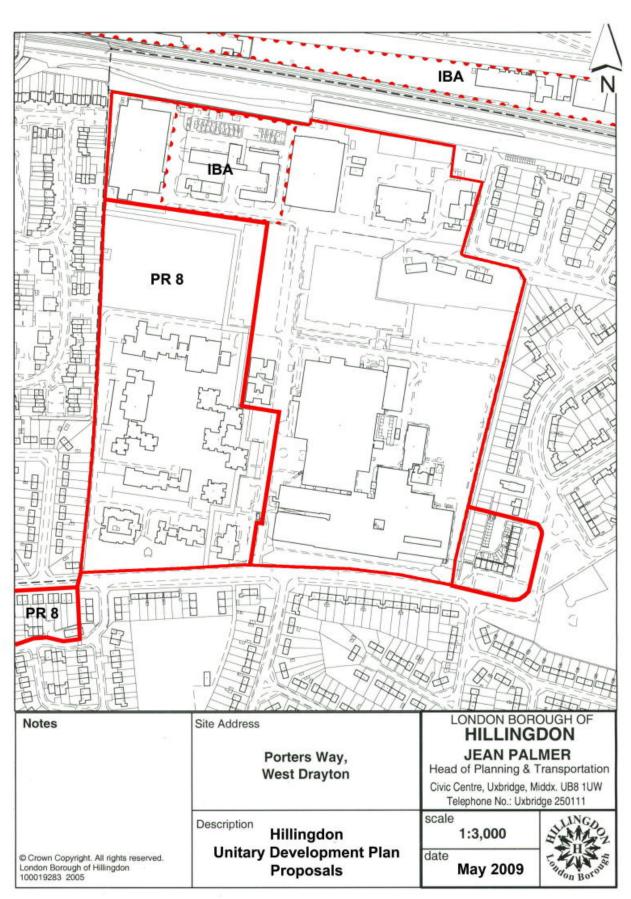
2.38 Along with the fact that most of the PR8 site has been redeveloped, the three criteria listed above are considered to be addressed through the update of this draft SPD:

- The SPD provides the planning framework for redevelopment of the site, in a co-ordinated and comprehensive manner
- Development proposals will need to demonstrate that development will not adversely impact on the local traffic network, and that appropriate improvements will be made;
- The character, uses and surrounding developments have been considered in preparing this revision to the SPD. The NATS site is vacated and there are no requirements for aviation facilities on the site.

Industrial Business Area

2.39 Hillingdon has a designated series of Industrial Business Areas (IBAs) as the proposed location for new industrial development. A small parcel of IBA land is identified on Map 4 above, on the former NATS site, adjoining the railway line in the north-west corner of the site. The Hillingdon 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. However, the de-designation will need to be pursued through the formal planning process. At present the IBA designation is applicable through the Hillingdon UDP and the site is protected as a Strategic Employment Location

(SEL) under the London Plan. In updating the LDF the Council intends to remove this designation, however, consideration of the Industrial nature and employment opportunities of this area will need to be considered. London Plan Policy 3B.4 Industrial Locations, 3B.8 Creative Industries, 3B.10 Environmental Industries, will need to be considered, along with Hillingdon UDP Saved Policies LE1, LE2 and LE3.



Map 5 Hillingdon UDP Designations

3 Development Framework

Development objectives

3.1 The objectives for the former National Air Traffic **Services (NATS)** Control site are:

- i. To ensure development of the site is sustainable and can be accommodated without detriment to the local community and environment;
- ii. To ensure that good quality design of the built environment, open spaces and landscaping is central to the achievement of a self-sustaining high quality development, which makes the best use of previously developed land, having regard to the relatively poor accessibility of the site.
- iii. To maintain and improve the amenity of adjoining residents and those that live in the vicinity through careful design, appropriate scale, siting and orientation of any new buildings and activities;
- iv. To provide a high quality residential-led scheme that reflects the area's general character and reinforces the local distinctiveness by design;
- v. To provide for a mixture of other uses appropriate for a residential area, including small-scale employment generating uses, starter units, live/work units, small-scale retail units and education/ health/ police and community facilities;
- vi. To provide a comprehensive scheme of high quality landscaping as an integral part of any new development. The landscaping should augment the existing features; retain and utilise trees of merit; maintain, enhance and improve biodiversity interests across the whole site; and provide a high quality setting for any new development and improve the general landscape;
- vii. To provide a satisfactory level of usable private amenity space as well as children's play area(s) and suitably located and functional public open spaces;
- viii. To ensure provision of a safe and secure environment through well considered design and the application of community safety by design principles;
- ix. To enable the creation of a community focus to the area by high quality streetscape design and the enhancement of the local shopping parade incorporating complementary education / health/ police/community facilities and public open space,
- x. To ensure that safe vehicular access is provided to and from the site and within the local vicinity by incorporating traffic and transport initiatives wherever necessary;
- xi. To maximise the use of public transport and other sustainable means of travel, including the promotion of cycling and pedestrian movements;
- xii. To improve pedestrian and cycle accessibility to and from the sites via improvements to localised routes, such as access to Area A from Rutters Close and traversing the site to Holly Gardens and Hawthorne Crescent and Porters Way will to enable improved access to public transport and local facilities and amenities.

- xiii. To provide safe and secure cycle parking facilities throughout the site in line with the Council's cycle parking standards and to meet the needs of users of the community facilities;
- xiv. To ensure the provision of sufficient **provide** car parking throughout the site in accordance with the Council'srevised parking standards, including provision for disabled parking;
- xv. To improve and upgrade Area B as a focal point for local shops and facilities and to include supporting community facilities, as appropriate, on adjoining land in Area A to strengthen this focal point, as part of the integrated redevelopment of the site
- xvi. To develop an interface between the IBA land located across the railway line to the north and the northern boundary of the site by removing any on site IBA designations whilst allowing for small-scale workshops and light industry appropriate within a residential area (B1).
- xvii. To ensure compliance with the Council's Planning Obligations Supplementary Planning Document (2008).

Design Approach

3.2 The redevelopment of the former NATS site provides the opportunity to create an area that is exemplary in terms of sustainable and high quality design, contributing to the local distinctiveness and providing a community that people are proud to live and work in. This section establishes the design and development principles that will be applied to all development within the site to ensure that the quality, character and sustainability of the area are of the highest standard. It is based upon the following development and design objectives:

- A new physical framework that considers the site and adjoining land in a comprehensive manner, providing consistency across and within the site boundaries.
- 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.
- A balance of land uses and level of development that contributes to economic, social and environmental objectives to improve the quality of life for people and respects the green and built context.
- A fully integrated layout with a high quality public realm designed in parallel with the built elements, to contribute to the local distinctiveness of the site and to create a strong sense of place
- A sympathetic integrated approach towards the linkage of the site with neighbouring areas and any area within the site itself.
- A sustainability driven approach to layout, orientation of buildings, functionality, adaptability, the use of natural building materials, recycling of materials and resourcefulness with water
- Contemporary, high quality architecture which provides for variation throughout the site and a strong local distinctiveness.

3.3 The Council places considerable emphasis on creating high quality design, as indicated by Hillingdon UDP saved policies and the adopted Hillingdon Design and Accessibility Statement. The Council will expect any application to be accompanied by a number of statements including a comprehensive design statement and open spaces/landscape design strategy and assessments that address sustainability, accessibility, sunlight and daylight, noise and vibration.

3.4 There are no heritage nor nature conservation designations that apply to the site. The existing buildings are not considered to be of either group or individual architectural or historic merit, either individually or as a group. However the proposals should acknowledge and reflect any historical associations with the site by retaining heritage features, providing plaques or other appropriate recognition. An important quality of the NATS site is the numerous large and valuable trees, and some strategically located hedgerows. Policy BE38 seeks to ensure that new development retains and utilises existing landscape features of merit and provides new planting and landscaping, and that it should, as well as creating open spaces

that are usable and of quality, enhance the landscape of the road frontage and provide a high quality setting for any development. Although there are no nature conservation designations that apply to the sites, it is known that the redevelopment of the former RAF West Drayton site raised some issues about the value for nature conservation and supported slow worms, which are a protected species. New development should include measures to enhance the natural environment for biodiversity, in accordance with relevant regulations, **further details are provided at 5.6 - 5.8 of the SPD.**

3.5 Policies BE13, BE19 and BE21 of the adopted UDP seek to ensure that new development will complement and improve the character and amenity of the area and harmonise with the existing street scene. Any proposed development should address the following issues:

- It should reflect the general scale and character of the neighbourhood including, height, scale, massing and density of surrounding built areas.
- It should retain and utilise trees and vegetation of merit and provide a hierarchy of public open space, semi-private and private amenity space, to create open spaces that are interesting and usable for different age groups and affording adequate privacy for residents.
- It should retain and provide memorable views, vistas and landmarks to create legibility and visual orientation.

Master Plan and Design Codes

3.6 A Master Plan is required to be submitted with the site proposals, **and this necessitates a co-ordinated and comprehensive approach**. Design Codes for the site reflecting the aspirations for the different parts of the site and the requirements in the SPD are required to be submitted with this. Future development will be required to comply with any approved Masterplan, Design Codes, and associated documents.

Site Analysis

3.7 A comprehensive site and context analysis should be undertaken and supplied in support of the site layout/**masterplan** for the redevelopment. This should address natural and manmade landscape features, topography, landscape character areas, scale and character of open spaces, significant habitat, landscape elements and built elements, enclosures, open spaces, visual links and landmarks. The site analysis should include the built and green context of adjoining areas as necessary to provide comprehensive background information for the Master Plan.

Landscape and Open Spaces Strategy

3.8 A landscape and open spaces strategy should be developed for the site with a clear vision for the site as a whole, as well as the characters of individual places. The Landscape and Open Spaces Strategy is a key document and forms the basis for the final master plan. A green and blue (water) framework for the site should be developed

at master planning stage in parallel with built areas. The green framework should be developed in parallel with the accessibility/movement network. The green/blue grid, open spaces and movement network should be the basis for the final masterplan.

3.9 A full tree survey must be submitted with the planning application and should inform the landscape strategy. An analysis of the importance of trees (individuals and groups) is required in order to identify the opportunities and constraints the trees will have on site layout proposals. It is particularly important to provide a very high quality landscape approach along the Porters Way frontage.

Visual analysis

3.10 A visual analysis will be required as part of the site analysis, which should inform the Master Plan. This should include the image and perception of the area, an assessment of gaps and enclosure, strategic and local views, skylines, landmarks, gateways and thresholds, boundaries and barriers, legibility and aesthetic quality.

<u>Urban form</u>

3.11 In accordance with London Plan policy 4B.7 and PPS1, the aim should be to create a locally distinctive place and an inclusive one. Redevelopment of the site must integrate within the surrounding area in accordance with Saved Policies BE13 (harmonisation with street scene) BE20, (daylight and sunlight) and BE21 (impacts on residential amenity). The height, bulk and densities must be compatible with site characteristics, and the surroundings.

3.12 Attention to detail and high quality finish is sought, rather than reproductions of "high volume" schemes. The opportunity for the provision of different textures and materials as part of buildings and the wider urban environment could be considered. Incorporation of functional aspects of the scheme such as Sustainable Urban Drainage Systems is required to be integrated into the design for the site, and should be considered at masterplanning stage.

Public art

3.13 Provision for public art should be accommodated in any redevelopment proposals. The provision of public art should accord with the Council's HDAS Public Realm document and Hillingdon Public Art Policy, which provides a wide definition of public art, including art works in the street scene, landscape art as well as innovative playgrounds. Public Art should be addressed in the Design Codes. The site's history and context such as its historic associations with aviation should also be considered as part of any proposals.

Lighting

3.14 The Design Codes should address the opportunity to use innovative lighting to promote a sense of identity, illuminate key features and guide main pedestrian thoroughfares. Aviation safeguarding requirements may apply, and consultation with BAA safeguarding will be required.

Community safety

3.15 Guidance in the Hillingdon Secured by Design SPG, along with the UK Police "Secure by Design" design codes and ODPM guidance should be considered and public safety and security measures addressed. The "Secured by Design" standard must be incorporated into the design and layout of housing, and the site as a whole should achieve "secured by design" status. Early consultation with the Metropolitan Police Crime Prevention Design Advisor is required to inform the planning process and the development of any plans for the site. Public facilities such as schools and medical facilities should also consider these requirements. All car parks must meet the Safer Parking 'Park Mark' standards.

3.16 Public safety and surveillance must be considered at the earliest stage in the site design. From a public safety perspective permeability should be limited to logical and necessary routes. All pedestrian footways and alleys should be as direct and overlooked as possible. A CCTV system will be required and this may also be required for specific public facilities and entry points to them such as children's playgrounds.

Accessibility

3.17 Any proposed development should incorporate the principles of accessible design as set out in the Hillingdon Design and Accessibility Statement – Accessible Hillingdon. It should also comply with London Plan policies 3A.5 and 4B.5. An Access Statement will be required to accompany the planning application as set out in the Hillingdon Design and Accessibility Statement – Accessible Hillingdon. The existing Air Cadet facility has an unrestricted right of way across the site for pedestrian and vehicular access, and this should be addressed through any planning application, particularly where the right of way needs to be varied to accommodate the proposed layout.

Layout and Urban Form

3.18 The vision for the site is to create a robust and clear framework of streets, green open areas and other public spaces with a strong identity that forms an attractive and safe environment for a mixed-use scheme of residential units, small scale employment and retail units integrated with community, health and leisure facilities. The scale, character and building design should work in tandem with the streetscape to create distinctive, useful and safe places. Street trees and landscaping materials shall be used in a creative way to achieve a legible and easily recognisable physical structure throughout the entire area.

3.19 The establishment of a home zone within the development would enable a safe integrated community to prosper and develop. Any development should interpret and transform the positive elements and principles of the existing context and then apply them to the development of a vibrant, high quality, suburban landscape that provides for a prosperous, healthy, safe and lively community.

3.20 Development should demonstrate connectivity through good urban design, with safe and easy access to local facilities. Services including health, educational or other community facilities, should be located to form a cluster in a highly accessible and prominent location on the Porters Way frontage, complimentary or as a replacement to the existing shops and services at Area B. There should be areas of public open space in close proximity to these local services and facilities. Planning obligations are likely to be required for environmental improvements and community safety, including improved public accessibility to local facilities.

Building Scale and Height

3.21 Apart from the recent development of 574 flats to the west, the character of the surrounding area consists largely of two storey buildings with the presence of some bungalows and three storey flats and town houses. A predominant height of two-storey development with some three-storey development would be considered suitable given the built context as this scale would protect the amenities of existing and future occupiers, and could be supported by the local transport network and other local infrastructure. Careful treatment of the development, against the western boundary, will be required, considering the scale and height of the buildings currently under construction there.

3.22 Any application for development above 15m in height will be referred to both NATS and BAA (Safeguarding) in accordance with safeguarding maps and directives. In determining appropriate scale and heights, the Council will also assess planning applications against the following Hillingdon UDP saved policies: Policy BE13 (Layout and appearance of new development), BE14 (Development of Sites in Isolation), BE18 (Design considerations – pedestrian security and safety), BE19 (New development within residential areas) BE20 (Daylight and Sunlight considerations), BE21 (Siting, bulk and proximity of new buildings), BE23 (External amenity space), BE24 (Design of new buildings), and BE38 (Trees and Landscaping).

Building Design and Character

3.23 A strong masterplan with a coherent blue and green framework, and well defined design codes, provides a robust context which will allow for a differentiation of design approaches and characters throughout the site. High quality design, natural materials and attention to details is expected for the development as a whole. However, a contemporary, innovative design approach is encouraged, based on sustainability principles, historic traditions in the area and local distinctiveness. Pastiche or mock

period design will not be accepted. Innovative uses of materials and textures is encouraged, as is the development of interesting but comprehensive colour schemes, **to be developed in consultation with the Council.**

Public open space

3.24 The provision of quality open space is essential to ensure a high standard of development and meet the quality of life expectations of existing and future residents. Open space is essential for recreation, relaxation, aesthetic and other intrinsic reasons, and the treatment of new and existing areas of open space will be a high priority for the development of this site. The accessibility of open space, together with the overall



layout of development proposals, must also play a role in the health and wellbeing of the community, with particular attention to address the problem of obesity.

3.25 London Plan policy 3D.11 requires the consideration of open space provision in planning documents, and Table 3D.1 of the London Plan provides a benchmark for the provision of open space. This will be a material consideration in assessing any planning application. The Hillingdon UDP saved policy R1 states that where residential development is proposed, satisfactory accessible amenity, recreational and play space is required (appropriate to the scale of the development) to meet accepted standards. The expected population for the proposed development should be ascertained at the time of the planning application (one reference may be the population table in the Council's Planning Obligations SPD) and a full assessment of the recreation needs will need to be provided by the developer. In considering open space provision and access for the new population on the site, reference should be made to the London Plan Open Space Strategies SPG in terms of distance to facilities. Guidance from Fields in Trust and Sport England will also need to be considered in assessing the needs of future and existing residents as a result of the redevelopment of this site.

3.26 It is considered that residential development of this scale will generate additional demand for sports facilities and physical activity, which should be addressed as an integral part of building sustainable communities. As such, due regard should be given to Sport England's Planning Policies for Sport (1999) containing planning policy objective 11: 'To promote the use of planning obligations as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development'. Adequate provision of sports facilities would be required as part of any proposed residential development.

3.27 The objective would be to ensure the provision of a complementary sports pitch/ active play / green open space development for the site, balanced between formal and informal, so as to provide a wide range of facilities for as large a cross section of the community as possible. The siting of these pitch/ sports facilities must have regard for the Council's SPG Community Safety by Design and offer safe access

for all (i.e. not located on the area near the main road). A management plan for these spaces (including mandatory safety inspections) should be submitted to and approved by the local planning authority prior to implementation.

3.28 In defining the appropriate types and levels of such provision, it is critical that the role of existing facilities is not overlooked in favour of providing new facilities which could result in the duplication of provision that is wasteful of scarce resources and can breed resentment within those left to use rundown facilities while their new neighbours benefit from new ones. As such, new facilities should not be provided at the expense of funding existing facilities in this part of the Borough. An assessment of existing facilities in parks, open spaces and schools is required to examine the extent to which those facilities can be upgraded and used for both the occupants of any new housing within Porter's Way and those already living in the area. This should ensure a balanced provision of facilities, avoid duplication, and, more importantly, aid the creation of a sustainable community.

3.29 The Council and the local community have an expectation that the existing Stockley Recreation Ground on Mulberry Parade will be substantially improved to accommodate the new residents on the former NATS site, along with the St Georges development. Contributions from the developer towards the improvements of the existing recreation facilities will be expected, in accordance with Councils adopted Planning Obligations SPD.

3.30 In addition to the requirements of HDAS (Residential Layouts), compliance will be required with the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation, along with the most recent guidance from Fields in Trust and Sport England. The Hillingdon PCT should also be involved in the preparation of proposals, particularly where this can benefit the health and wellbeing of the community. Particular attention must be given to the opportunities to encourage children and young people to engage in physical activity, whether through formal or informal sports, provision of play space and areas for social interaction. The needs of other groups must also be considered, including the elderly and groups that may normally be excluded from such opportunities. Any new residential development should ensure that all groups of residents have good quality private amenity space and easy access to robust, usable open spaces of different scales.

Transport and Accessibility

3.31 Redevelopment of the site will result in demands for transport and accessibility. The additional movement of people and goods needs to be managed by increasing transport capacity in the area to mitigate any congestion that could arise as a result of the new development. Stimulating sustainable forms of travel between the site and the existing town centre and surrounding



area, is important to create cultural vitality and stimulate economic activity, whilst offering improved accessibility and other opportunities for the new residents of the site, and the existing surrounding residents.

3.32 The opportunity exists to design a space that reduces carbon emissions from transport by prioritising the sustainable and active travel modes of walking, cycling and public transport, reducing the development's impact on climate change and meeting government targets. A focus on active travel has the dual purpose of promoting exercise and wellbeing as well as encouraging interaction in the community as people share well designed public spaces by foot and cycle. The development must also be accessible and welcoming to all people in the community, including those with disabilities, children and elderly and all passageways should be designed so people feel safe to move about.

3.33 It is essential that the travel wants and needs created by the development are thoroughly understood so that appropriate transport infrastructure and services can be designed on and off to site to facilitate access and mitigate congestion. It is accepted that some increases in private vehicle traffic on the public highway will be unavoidable, however the development should seek to balance this by prioritising and encouraging sustainable transport options through good design and travel planning. Any potential congestion on the public transport network arising as a result of the development is not acceptable and must be mitigated against by boosting capacity.

Transport Assessment and Travel Plan

3.34 In accordance with PPG 13, and the requirements of Transport for London (TfL), a Transport Assessment (TA) will be required with any planning application for the site. Any Transport Assessment will need to comply with TfL's Transport Assessment Best Practice Guidance, and should be developed in consultation with the Council, TfL and other stakeholders.

3.35 In tandem with the TA, a Framework Travel Plan will need to be developed in close consultation with the Council, TfL and other stakeholders, and in accordance with TfL's "Guidance for residential travel planning in London" and "Guidance for Workplace Travel Planning for Development". **Further guidance is also included within the Department for Transport (DfT) circular 02/2007.** The framework travel plan must demonstrate a comprehensive understanding of the complex travel needs and patterns created by the different uses on the proposed development within their geographical context. The travel needs of different users must also be investigated, including disabled people and the elderly and the plan should integrate with complimentary council strategies, for instance, combating childhood obesity and promoting social inclusion. The overarching purpose of the travel plan is to influence travel behaviour by encouraging the use of sustainable travel, primarily through design, infrastructure and service provision and secondly by a detailed and ongoing social marketing strategy.

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3.36 The framework travel plan will be required at outline application stage. The framework plan establishes a set of guiding principles, sets policy and overall targets, and coordinates all travel planning activity across the site. As detailed planning applications are submitted for sections and uses on the site, full travel plans will be needed to comply with TfL guidance. A substantial bond will accompany the travel plan to be drawn upon in the event that targets are not met and mitigation measures employed by the developer in response to such a situation are inadequate.

3.37 In addition to the general principles raised above, a number of site specific issues have also been identified. In accordance with Saved Policies AM1, AM2, AM6, AM7, AM8, AM9 and AM10 of the Hillingdon UDP, the following issues have been listed to help inform the master planning of the site, and will need to be specifically addressed in a Transport Assessment and Travel Plan/s. These include, but are not limited to:

- Provision of a high quality pedestrian and cycle link connecting the site with West Drayton Town Centre, West Drayton Rail Station, and the surrounding areas, maximising key views and amenity for users along the way.
- Increased use of public transport, walking and cycling, with a realistic approach to car parking requirements in this Outer London location
- Reduced traffic speeds, improved road safety and personal security
- Consolidation of delivery and freight movements
- The objectives of the air quality management plan
- Reduce vehicle carbon emissions for the development as a whole through modal shift and reduction in on-site car parking and ownership where appropriate and achievable
- Consistency with the Local Implementation Plan
- Consistency with advice from TfL and relevant local and London wide policies

The incorporation of "homezone" concepts across the site, subject to a range 3.38 of secure by design considerations, will be supported, provided that the buildings have a clear and strong relationship with the street frontage, and the street pattern is simple and easily navigable for vehicles, pedestrians and cyclists. will also be expected Any proposed home zone should include provisions such as shared pedestrian, cycle and vehicle space, restraint on car movement and restraints on car parking. Homezones are not merely shared road spaces but should be areas where pedestrians feel safe to stop and talk with neighbours and children can freely play as might occur on traditional footpaths - hence homezones are places of interaction as well as movement and must be designed accordingly. The nature of homezones also causes inherent problems for people with disabilities and evidence needs to be supplied that the requirements of disabled people have been considered in homezone design through consultation with local groups representing people with disabilities. The development should comply with London Plan policy 3C.18 and the Institute of Highway Incorporated Engineers' (IHIE) Home Zone Design Guidelines

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published in 2002, along with *Home Zones - Challenging the future of our streets* from the Department for Transport. The following objectives from the IHIE guidelines are especially important:

- To reduce traffic speed to maximise the sense of safety for vulnerable road users such as pedestrians, cyclists, older people, children and people with disabilities,
- To incorporate appropriate measures to ensure there are limited risks and potential for conflict between cars and other users.
- To incorporate attractive paving, street furniture, lighting and planting to make the streets more attractive to users
- To consider SUDS and drainage in designing streets, to limit the use of kerb and guttering and other hard features and surfaces that can create barriers to mobility impaired people, children, cyclists and pedestrians
- To do everything possible, through design and other measures, to encourage walking and cycling within the home zone and adjacent area
- To increase surveillance, deterring casual crime
- To contribute to improving the quality of life of residents and visitors

Public transport requirements

3.39 In accordance with Saved Policy AM2 **along with PPG 13 and London Plan Policy 3C.9**, a review of the impact on local public transport from the new development will be required. This should establish the current baseline situation and assess the impact on it from the new population, workers and visitors to the site. An evaluation will be required to ascertain the requirements for improvement to facilities and/or services to support the redevelopment of the site. 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 that assessment may potentially influence the design, mix and scale of any development that can be delivered on site.

3.40 Planning obligations may be sought in accordance with the Council's adopted Planning Obligations SPD toward public transport improvements, **along with improvements to the pedestrian and cycling facilities on and around the site**. These are likely to be, though not limited to:

- Provision of new, and upgrades to existing, facilities such as bus shelters and bus stops
- Improvements to bus arrangements servicing the site
- Contributions towards improvements to walking and cycling facilities around the site
- Contributions or upgrades to public transport facilities around the site, particularly at West Drayton rail stationat the Uxbridge underground and bus station
- Provision of bus stop/ bus standing facilities and driver facilities in the site
- Some form of bus priority measures

- Passenger information systems
- Improvements to transport interchanges as a result of the new population
- The development or implementation of the British Waterways 'Waterspace Strategy'.

Car parking requirements

3.41 Any proposals for the site should aim to reduce reliance on the private motor vehicle in accordance with national and London Plan policy guidance. Such an approach will need to be incorporated into the Transport Assessment and Travel Plan Framework, which will then inform the approach that should be taken to car parking controls and restraint across the site. Car parking for all uses should comply with Council's standards applicable at the time and in accordance with Saved Policies AM14, AM15 and AM16 of the Hillingdon UDP, and generally in accordance with the controls of the London Plan and objectives of PPG 13.

3.42 The design and layout of car parking will need to comply with the Council's adopted standards. Car parking in residential areas should be generally in accordance with the 'homezone' concept and will need to ensure facilities are the most visually and functionally appropriate given the needs and constraints of the site, and the other objectives in this SPD. The introduction of car clubs, facilities for electric cars and other initiatives will need to be investigated and will be expected **to be delivered.** unless proven to be unviable. Developers will be expected to enter in to early discussions with the Council, TfL, the Highways Agency and other relevant parties as part of the planning process.

3.43 However, whilst every endeavour must be made to incorporate improvements for pedestrians and cyclists, there must **also** be a realistic assessment of the desire and need for people to drive cars, particularly in this outer London location, and the impact this may have on the local traffic network, and car parking in the local area. In developing plans for development of the site, the applicant would be expected to engage the local community, the local council, TfL and other stakeholders to address this issue.

Walking and Cycling

3.44 The Porters Way development is situated close to the London Cycle Network Plus (LCN+) No. 89 signed route. This route extends from the A4 Bath Road in the south of the borough (with links into Heathrow Airport) along Sipson Road to West Drayton and Yiewsley, and then onto Uxbridge where it joins other routes to provide links through to both the east and north of the borough. There is also a spur from the No.



89 cycle route that runs from the Porters Way junction along Kingston Lane, crossing the Grand Union Canal to continue up to Hillingdon Hill. This spur route links with the cycle path that runs along the Grand Union Canal, providing access close to West

Drayton Main Line railway station. Any proposed development should include new **and improved** cycle links to these existing cycle routes to ensure that residents have adequate access to employment, retail, leisure, recreational, community and other services and facilities within the borough and the wider area.

3.45 The 'London Loop' walking trail follows the canal side between West Drayton station and the footbridge which crosses the railway lines, immediately to the west of the site. A public right of way exists immediately over the railway line which follows the canal, though there is a break of around 600m between the London Loop at this right of way, which is separated by industrial developments along the canal side. Opportunities to improve access to the 'London Loop', other rights of way, and pedestrian access to the town centre and other areas will need to be explored as part of the redevelopment of this site.

3.46 The site layout should provide legibility, distinctive identity and encourage opportunities for travel that are not reliant on the car. In particular pedestrian and cycle routes that provide direct access from the former NATS site to West Drayton Station, linking with Porters Way and Rutters Close need to be provided. Applicants will also be required to provide further pedestrian and cycle facilities within the local area to ensure that the site is accessible to existing services and facilities and this may include pedestrian crossings and Safer Routes to Schools. Pedestrian and cycle routes should be clearly lit and signposted, delineated by appropriate surface treatment and overlooked by active building frontages. The provision of secure cycle parking will be required at all non-residential facilities in compliance with London Plan policy **3C.22**. Residential cycle parking must be discreetly designed, covered and secure. The provision of high quality way finding facilities, linking important destinations on and off the site with public transport nodes, walking and cycling paths will be required. The developer needs to use 'Legible London' signing for way finding, if it is available, before the development is occupied. The way finding / signage strategy should be developed in consultation with TfL. A single 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.

Accessibility

3.47 The redevelopment of the site will need to demonstrate a commitment to making public transport and the pedestrian environment accessible to everyone, especially disabled people. London Plan Policy 4B.5 'creating an inclusive environment' and the Mayors SPG "Accessible London" provide detailed guidance which will inform the site layout and detailed considerations for any development. Further requirements detailed in the Hillingdon Design and Accessibility Statement SPD "Accessible Hillingdon" must be included as a key consideration in developing the site masterplan. The "Accessible Hillingdon" document will need to be reviewed in its entirety, however some of the key requirements are:

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- Routes should be direct, well lit, and well sign posted. They should be level, with the gradient not exceeding 1 in 20. Where the gradient is steeper than 1 in 20 it should be designed as ramped access. Cross-falls should not exceed 1 in 50.
- All routes used by pedestrians should be at least 2m wide, to allow wheelchairs and pushchairs to pass, and should be significantly wider in areas of high pedestrian activity. Consideration of all street furniture will need to be demonstrated in the design of footpaths to allow an unobstructed easy flow of pedestrian traffic. Drainage gratings should be located off access routes.
- All street furniture will need to be located clear of pedestrian routes and clearly distinguishable from its background. Such additions will need to be given consideration at masterplan stage and detailed through planning applications.
- Level access is essential for the majority of wheelchair users. There should be dropped kerbs at junctions and designated crossing points with appropriate tactile paving. Developers will be expected to demonstrate that the avoidance of kerbs and other barriers has been investigated and incorporated where appropriate.
- Seats should be provided along pedestrian routes and where waiting is likely. There should be adjoining space for wheelchairs, pushchairs and other such users.
- 10% of all parking spaces shall be provided to mobility standards and must comply with the detailed design requirements as set out in the Disability Discrimination Act 1995 and Building Regulations BS8300: 2001. The design of all car parks including those for people with disabilities, must form an integral part of the design of the entire development, including safe and direct access to the residential units and must achieve "Secure by Design" standards and comply with the SPG on Community Safety by Design.
- Access to a bus stop should be a maximum of 400m in accordance with Transport for London's 'Accessible bus stop design guidance'. Suitable justification should be provided where this is not going to be provided. Where such access is justifiably unavailable, the proposals must include additional mitigation to ensure the development has a positive impact on Hillingdon's aspirations for a sustainable transport network. This mitigation will be in addition to the development's enhancement of the existing public transport facilities.

3.48 Other provisions of HDAS (Accessible Hillingdon) will be required at the planning application and reserved matters stages and as such must be satisfactorily addressed.

Construction Traffic Management

3.49 In accordance with Saved Policy AM2, a construction traffic management plan will be required to be provided prior to works commencing on site with the aim of minimising traffic impacts on and around the site, ultimately through limiting unnecessary vehicular movement if possible. The developer will be required to adhere to the construction management plan during the site development and construction

phase. A construction management plan will be required to be developed with the Council, TfL, the Highways Agency and other key stakeholders, **and in accordance with the London Freight Plan to support any planning application.**

3.50 A construction travel plan must be submitted and approved by the council before the development can commence. The construction travel plan will focus on means of access to the site for construction workers and other on-site employees. The travel plan needs to encourage the use of sustainable transport to the development and include a cap for on-site parking during the construction phase of the development.

Crossrail

3.51 Network Rail are currently in the process of further developing all work packages for crossrail, and are undergoing extensive planning to organise the way in which the work will be delivered and when. The work must be planned taking into account a number of considerations including the running of services on the line, other renewal works and external expected action such as the Okennia.

works and external consideration such as the Olympics. Network Rail expect to have developed a baseline programme in late 2010. Various track and platform works will be required at West Drayton station to accommodate Crossrail trains which will be 10 carriages long. It is likely that platform three will be extended eastwards by 65m, platform four will be lengthened at the eastern end by 62 m, and the curvature of the goods line behind platform four will be adjusted to allow for the provision of a new face to platform five. Draft proposals are for the eastbound goods line to be realigned and re-designated as the eastbound relief line. Overhead line equipment will be installed on all five tracks at the station. In addition the Horton Bridge pedestrian footway to the west of the site will need to be rebuilt. Opportunities to co-ordinate the redevelopment of the NATS site, particularly pedestrian and cycle access to and around the station, with the construction of Crossrail need to be explored through the planning process.



4 Requirements for specific land uses

4.1 Those developments that are considered acceptable in principle on the site are detailed below:

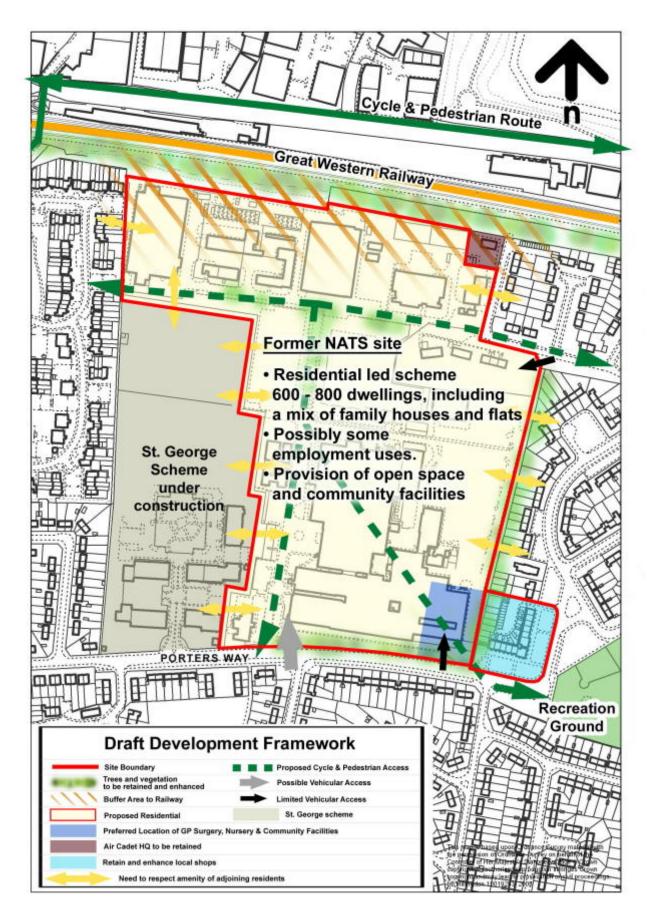
- Development primarily for residential purposes (C3);
- Local facilities in the form of a local centre including and adjacent to the existing shops at Area B, which will incorporate a range of small-scale facilities (use classes A1 – shops, A2 – financial and professional services, A3 – restaurants and cafes, A5 - takeaways) and community uses, health police services and education;
- Small-scale workshops/starter units/ light industry appropriate within a residential area (use class B1) to be developed along the northern boundary as a buffer to housing within the site, whilst removing any on-site IBA designations.
- Small scale non-residential institutions (use class D1) such as crèche, day nursery, or consulting room compatible with a residential area.
- Small scale residential institutions (use class C2) such as residential, education and training centres.

4.2 The following types of uses would generally be considered inappropriate on the site, due to the likely high levels of heavy vehicle-of traffic, and incompatible nature with surrounding residential areas, and the likely adverse impact on the existing town centre and local shops:

- Retail superstore or any retail development that serves more than the immediate local community;
- Large scale business or industrial uses, including storage and distribution centres and warehouses (use classes B2, B8
- Hotels (use class C1)
- Large scale assembly and leisure facilities (use class D2)

4.3 The previous use of the site was predominantly single employment uses. However, redevelopment provides an excellent opportunity to create a mixed, balanced and sustainable community as embodied in the Sustainable Community Strategy 2008-2011, the Unitary Development Plan and the emerging Local Development Framework, along with regional and national government policy.

Map 6 Draft Development Framework



Housing

4.4 The Council has an expectation that any new housing on the site will be of high quality urban design that respects the context and the local community and improves the aesthetic appeal of the area. There will be requirements for a satisfactorily overall mix of uses and a sustainable residential development that incorporates secured by design principles, sustainable design and construction and exemplary development.

Density

4.5 Proposals for the Mayor's London Plan, April 2009, states that:

On too many occasions in the past the clamour to achieve the maximum permissible densities has been the overriding concern for many new developments, sometimes to the detriment of their surroundings, existing environments and local social infrastructure.



4.6 The London Plan includes a range of considerations that

need to inform the density, scale, form, layout and overall development in any circumstance. PPS 1 and PPG 3 also include a range of specific policies on the subject of good design, and state that in considering the appropriate density for developments this needs to be influenced by local context and local communities, and other design considerations.

4.7 The London Plan includes a range of considerations that need to inform the density, scale, form, layout and overall development in any circumstance.

4.8 PPS 1 and PPG 3 also include a range of specific policies on the subject of good design, and state that in considering the appropriate density for developments this needs to be influenced by local context and local communities, and other design considerations.

4.9 The adjoining development of 574 dwellings was considered, at appeal, to be a 'borderline' case and the Inspector allowed a density of development suitable to an 'urban' context. The former NATS site is further removed from West Drayton town centre, and with a PTAL ranging from 1 to 0, it is surrounded by an established suburban residential area, apart from the recently approved scheme. The Council considers that the London Plan density matrix indicates that the site is in a suburban context, and the appropriate density would be in the range of 35-75 units per hectare, or **150-200 habitable rooms per hectare**. Significant improvements to the public transport accessibility of the site could push the density up to 95 units per hectare for some parts of the site. Considering the need for a Doctors surgery on site, a Nursery, some employment and small scale commercial uses and the IBA designated parcel of land, together with the constraints in close proximity to the railway line, the adjacent St George development, and requirements for open space, it is considered that the

site would yield around 600 - 800 dwellings. However, any development should be informed by the suitable form, scale, and height of development, rather than trying to satisfy the numerical figures contained in the London Plan development matrix.

Housing Mix

4.10 A mix of housing sizes will be required across the site, in accordance with the West London Housing Partnership Investment Guide 2008-11, published 2007, or its replacement. The current mix of affordable social rent housing is set out in the table below:

- 1 bedroom 15%
- 2 bedroom 35 %
- 3 bedroom 25%
- 4 bedroom 15%
- 5 bedroom 10%

4.11 The guide further states that the boroughs should seek a target of at least 15% of all Low Cost Home Ownership built to be three bedrooms or more. This is further encouraged in the Mayor's draft Housing Strategy.

Code for Sustainable Homes

4.12 Consistent with the aspiration for low carbon development, all new housing development on the site must achieve as a minimum, the requirements of Level 4 of the Code for Sustainable Homes. Higher standards will be encouraged **particularly as the requirements of the Code for Sustainable Homes increase.** - aswe move closer to 2016. Further guidance on sustainable design and construction for this site are within the 'Sustainable Development' section of this SPD.

Development standards

4.13 The Council's Hillingdon Design and Accessibility Standards (HDAS) document "Residential Layouts" details requirements for minimum room sizes, layouts, amenity areas and other details for new housing development. All floor space standards will need to comply with the latest guidance from Council, unless superseded by advice from the GLA. The draft London Housing Design Guide provides detailed provisions for floor space standards and this should be utilised in designing dwellings for the site. In addition to the Council requirements, developments will be expected to comply with CABE 'building for life' and Design and Quality Standards 2007. At present the minimum floor space standards are set out in the Council's HDAS SPD as follows:

Recommended floor space standards								
	5 bed	4 bed	3 bed	2 bed	1 bed	Studio		
Three storey house	108m ²	103m ²				-		
1 or 2 storey house	101m ²	92m ²	81m ²	63m ²	50m ²	-		
Maisonette	101m ²	90m ²	79m ²	63m ²	50m ²	-		
Flat	94.6m ²	87m ²	77m ²	63m ²	50m ²	33m ²		

Source: Table 2 - HDAS Residential layouts

Note: Where usable balconies are provided, the floorspace of the balcony or balconies can be deducted from the above totals up to a maximum of 5m². Garages should not be included in the calculation of floor space. Affordable housing should be guided by the Housing Corporation's floor space standards.

Private Amenity Space

4.14 Policy BE23 of the Saved Hillingdon UDP states that new residential buildings should provide or maintain external amenity space which is sufficient to protect the amenity of the occupants of the proposed and surrounding buildings and which is usable in terms of its shape and siting. Policy R1 states that where development is proposed in or near an area deficient in recreational open space, the Local Planning Authority may require developers to provide publicly accessible recreational open space, including children's play space, appropriate to the scale and type of development to serve an area of identified deficiency. The latter is in addition to the private amenity space requirements of the occupiers of the development. Whilst the site is not in a defined open space deficiency area in the Hillingdon UDP, it is near such an area and some parts are more than 0.25 miles from a children's playground.

4.15 Developments should incorporate usable, attractively laid out and private garden space conveniently located in relation to the property or properties it serves. It should be of an appropriate size, having regard to the size of the dwelling and character of the area. Further details on the calculation of amenity space are in HDAS Residential Layouts and this should be addressed as part of any site proposals. Note that any unusable amenity space will be excluded from the calculations.

Amenity space for dwelling houses				
1 bed house	Minimum of 40m ²			
2 & 3 bedroom house	Minimum of 60m ²			
4 bedroom house	Minimum of 100m ²			
5+ bedroom house	Minimum of 100m ²			
Source: HDAS Residential layouts				

Shared amenity space for flats & maisonettes(including the conversion of houses)

Studio & 1 bed bedroom flat	20m ² per flat		
2 bed bedroom flat	25m ² per flat		
3+ bedroom flat	30m ² per flat		
Source: HDAS Residential layouts			

4.16 Demonstration that site proposals address London Plan Policy 3D.**134** (Children's Play and Informal Recreation Strategies) will be required. This requires that developments which include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. The Mayor's SPG *"Providing for Children's and Young People's Play and Informal Recreation"* outlines that the benchmark standard of a minimum of 10 square metres per child should be applied to establish the quantitative requirements for play space. Child yield should be appraised in accordance with the draft Planning Obligations SPD. Provision of play space will be required on site in accordance with the Mayor's SPG.

4.17 Hillingdon UDP Saved Policy R1 states that amenity and recreational should include provision for the landscaping, equipping and future maintenance of the additional open space. Areas of high quality amenity space, with opportunities for passive and active recreation, along with children's play space will be required. The creation of all such spaces shall be attractive and well designed and conform to secured by design principles. Children's play areas should incorporate informal elements that reflect the attributes of the site, notably the natural environment and the historic characteristics of the site. Such details will need to be demonstrated with any planning application, and any masterplan submitted will need to ensure that children's play space, along with access to them, is integral to the design and layout of the development.

Accessibility and Lifetime homes

4.18 In accordance with London Plan policy and HDAS requirements, at least 10% of all new-affordable housing shall be provided to full wheelchair accessibility standards. All homes not being built to full wheelchair accessibility standard should be built to lifetime homes standards. In preparing a masterplan for the site reference will need to be made to the London Development Agency 'inclusive design toolkit', in particular section 2.6. 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 specific -particular needs of the potential resident, for example elderly housing. Detailed assessment will be undertaken at the application stage. In addition developers should follow the guidance set out in "Building for Life" published by CABE, September 2008.

Affordable Housing requirements

4.19 The London Plan is currently going through a policy transition with regard to affordable housing. Current practice tends to seek 50% affordable housing on all development sites capable of producing 10 or more units. Recent advice from the Mayor of London suggests a borough wide target for provision of affordable housing, with the borough to make decisions with regard to the quantity and location of affordable housing within the borough.

4.20 Any development will be expected to comply with the London Plan, advice from the Mayor of London and the needs and aspirations of the borough. The Council will work with the developer, registered social landlords, and other stakeholders to ensure that the most suitable level of affordable housing is provided on the site in accordance with the specific local circumstances. The Council will seek to negotiate the maximum reasonable amount of affordable housing and to ensure that these units will continue to be affordable for successive occupiers.

4.21 Affordable units should be distributed throughout the site and well integrated into the development. Whilst a target of 50% affordable housing is the aim of the London Plan, along with a need to include a mix of social rented and intermediate tenures at a 70:30 ratio, the final level of provision will need to give specific consideration to the circumstances of the site and in the interests of creating sustainable communities. The surrounding area has a relatively high ratio of affordable housing already, and 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 of the area, or the socio-economic and demographic makeup of the community. The provision of affordable housing will be subject to detailed pre-application discussions, and will also be dependent on a viability assessment to ensure delivery of the SPD objectives. Innovative affordable solutions will be sought with the distribution of affordable housing throughout the site in each phase of development. The London Plan does recognise that in order to

promote the redevelopment of sites, reductions in the provision of affordable housing may be acceptable, subject to a satisfactory financial viability appraisal and other material considerations.

4.22 Whilst there is a growing requirement for social rented accommodation across West London, there is also an increasing need for intermediate housing in the borough. The significant and increasing gap in Hillingdon between house prices and average incomes of household's means that many low and middle-income people cannot afford to purchase their first home on the open market in the borough. The government's initiative for intermediate housing helps those with low income into the housing market. The council supports this initiative and considers that there should be an increased emphasis on intermediate homes to help low income and key sector workers into homes. The Council therefore seeks **a minimum** 30% of affordable housing by habitable room to be for intermediate tenure including **various options for** shared ownership. with 70% social rented housing.

4.23 However a large proportion of low and middle-income people do not qualify for the government's intermediate scheme because their income is above the qualifying level. In order to enable these people to receive some practical help to get onto the housing ladder, the council considers that a more flexible approach should be applied to the provision of intermediate housing, and would strongly support developers promoting their own shared ownership / equity models on the site, **to be developed in consultation with the Council**.

Elderly Housing

4.24 As part of the affordable housing requirements, provision will be required for specialist housing for extra care housing for older people and supported housing for adults with learning disabilities. This can have the benefit of creating availability of additional specialist elderly housing, and increasing the availability of larger houses for families in need of housing across the borough.

4.25 The provision of housing aimed specifically at the elderly will need to give special consideration to the requirements of potential residents, along with the design quality of any buildings to ensure a quality interface with the surrounding area.

Specialist housing required

4.26 Liaison will be required with the Development Team in the Council's Adult Social Care Health and Housing Department as specialist housing priorities may change over time. There is an expectation that special needs housing will be provided on this site to meet those needs.

Affordable Housing Standards

4.27 The current size **and** mix of affordable housing units sought is set out in the West London Housing Partnership Investment Guide 2008-11, published in July 2007, which is a guide to any housing providers intending to bid for Housing Corporation funding for new affordable housing schemes in West London in 2008 to 2011. These guidelines will also apply to private housing. The draft London Housing Design Guide also provides detailed requirements and standards for new dwellings in in London.

4.28 Existing minimum requirements for affordable dwellings housing are summarised below :

Dwelling type	flat	flat	house	flat	house	house	house
Number of bedrooms	1	2	2	3	3	4	5
Guide Max Person Occupancy / No of Bed spaces	2	4	4	6	6	7	9
Guide Minimum Size*	45m ²	70m ²	80m ²	85m ²	95m ²	110m ²	135 m ²
*Note that the most important guideline is that all rooms must be of adequate size and shape for activities associated with their use.							

4.29 At least 10% of all new-affordable housing should be provided to full wheelchair accessibility standard. This 10% can be provided either as single-family dwelling with 2 or more bedrooms (to allow for sleep-in carer) or as supported housing for people with special needs. Sizes for full wheelchair accessibility will be significantly larger than the guide sizes above for the same number of bedrooms in order to meet wheelchair accessibility standards.

4.30 All new Affordable Housing must meet Housing Corporation Design and Quality Standards. As well as providing high quality dwellings and amenity spaces, all affordable housing units should be virtually indistinguishable in design terms from the open market. To ensure community cohesion and in accordance with the Affordable Housing SPD pepper potting of affordable housing throughout the site will be required in a co-ordinated and logical manner.

Commercial

4.31 The value of mixed-use developments in promoting sustainability is supported in PPS1, PPG3, PPS6 and PPG13. Providing access to a range of local community facilities and services to meet residents' needs is an essential component of building a successful and sustainable local community.

4.32 Mixed developments should seek to ensure:

- vitality and vibrancy of streets and places, particularly after daytime hours;
- increased viability and support for businesses
- the creation of a sense of place
- the creation of a community focus and sense of community and identity
- increased social interaction
- a feeling of safety
- more efficient use of resources and buildings
- convenient access and reduced need to travel

4.33 The Council will therefore require a range and mix of uses (places and spaces) within the site, and access to those in the surrounding areas, where a variety of activities can take place.

4.34 Whilst recognising that this will be predominantly a residential area, and that it is part of a wider area with a range of facilities, any proposals for the area must provide a mix of residential unit types and sizes, supported by appropriate local retail and other services such as health, educational and community facilities. In addition, an element of the site should be retained in employment use comprising essentially of small start up, commercial units and live/work units. The mix, nature and scale of uses should be supported by relevant assessments, including a retail, leisure, health and community facilities assessment, to be submitted as part of any planning application.

4.35 The location of uses must be carefully considered and the Council will expect the applicant to demonstrate that the location of uses take into account the following:

- the nature of the street network
- key movement routes
- the need for safe and convenient connections between uses
- the creation of home zones
- co-location of facilities to allow for synergy of uses
- the location and densities of residential areas/catchments
- the location, integration and quality of public open spaces



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4.36 The above can be achieved through submission, as part of any planning application, of a masterplan, supported by a comprehensive design and access statement, retail needs assessment, transport assessment and travel plan, open spaces/landscape design strategy and other supporting documents.

Retail

4.37 The redevelopment of the NATS site will provide the opportunity to enhance or relocate the existing shops on site B, and could include further enhanced local retail opportunities. Any proposals will need to demonstrate the suitability of any proposed retail uses. A suitable mixed use scheme to compliment and enhance the existing shops, without having any



adverse impacts on the existing retail operators on site B or in the Yiewsley/West Drayton town centre, may be suitable. The Council will not permit any large retail outlets on the site, or other uses that do not give adequate consideration to the existing local shops. A co-ordinated approach, with close consultation between the Council and the developer of the NATS site, and engaging local residents and the business owners affected, will be required through the planning process. The developer will be required to demonstrate compliance with national guidance, including Planning Policy Statement 6, or its replacement. The current needs test requires any developer to justify the development through:

- the need for the development
- that the development is of an appropriate scale
- that there are no more central sites for development
- that there are no unacceptable impacts on existing centre
- that the location is acceptable

4.38 The sequential approach requires that locations are considered in the following order:

- first, locations in appropriate existing centres where suitable sites or buildings for conversion are, or are likely to become, available within the development plan document period, taking account of an appropriate scale of development in relation to the role and function of the centre; and then
- edge-of-centre locations, with preference given to sites that are or will be well-connected to the centre; and then
- out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre.

4.39 It is considered that any large retail outlets, or other town centre uses, would be incompatible with the policy guidance, and would not be suitable to this site.

Industrial

4.40 Hillingdon has designated a number of Industrial Business Areas (IBAs) as locations suitable for industrial type development. A small parcel of IBA land is identified on Map **5 4** above, on the former NATS site, adjoining the railway line in the north-west corner of the site. In updating the LDF the Council **is likely to seek**is seeking tp intends to remove this designation. However,

consideration of the industrial nature and employment opportunities of this area will need to be considered. London Plan Policy 3B.4 - Industrial Locations, and 3B.8 - Creative Industries, will need to be considered, along with Hillingdon UDP Saved Policies LE1, LE2 and LE3.

4.41 The parcel of IBA designated land sits in a very sensitive location, being immediately adjacent to residential developments, where the quality of life of residents will be the highest priority. Given the location, the site could be a useful buffer between the railway and residential land and this will need to be considered in developing any masterplan. Only light industrial uses, and enterprises that respect and enhance the residential environment would be supported in this location. Small business units, start up industries and particularly the creative industry may be appropriate to this location. Mixed use, live/work units could be appropriate, however attention to the living environment would need to specifically mitigate against any adverse impacts, given the proximity of surrounding industrial uses, and the proximity of the railway line. Whilst there may be some demand for small scale light industry, proposals for large scale industry, warehouses and other large units would be strongly resisted, and would not comply with the objectives and policies of the London Plan and Hillingdon UDP.

4.42 London Plan Policy 3B.10 promotes environment industries, and states that the Mayor, the LDA and other agencies will support the establishment of green industries and green practices in business. Given the designation of the IBA land, small start up green industry enterprises should be explored for the site. The provision of energy generation in this location may also be suitable to provide renewable energy for the residential developments on this site, and possibly the surrounding area. This idea will need to be fully explored further with the local Council and relevant stakeholders through the pre-application process.

Community Facilities

Education

4.43 The Council expects that any redevelopment of the NATS site will provide improvements to education facilities, commensurate with the increased school age population. PPS1 and the London Plan set out the importance of education facilities to the community. In accordance with London Plan Policy 3A.24 and paragraph 3.115, the Council's Planning Obligations Supplementary Planning Document 2008, and with



regard to Hillingdon UDP Policy R17, planning obligations will be sought to address any shortfall in school capacity arising from new residential development, and to ensure that additional capacity and appropriate improvements can be carried out. Any proposals will need to comply with local circumstances and needs. The child yield will be calculated using the formula prescribed in the Planning Obligations SPD or any subsequent approved amendments to that SPD.

4.44 The framework travel plan, and subsequent detailed travel plans, will be required to be address the issue of access to education, and appropriate measures will need to be in place to improve accessibility to and from the nearest education facilities, relevant to the school age population generated by the site. This will be done in accordance with the requirements of Council's Planning Obligations SPD in order to promote safe cycle and walking routes, restrict car parking and car access at and around schools. **ItAny proposals** should also take into account include on-site changing and cycle storage facilities as required.

Pre- School facilities

4.45 It is unlikely that the existing nursery or pre-school facilities will be able to accommodate the likely child yield from new residential development, and some additional provision will therefore be required, with a pre-school facility required on site. The design, location and management of the pre-school facility will need to be discussed with the Council through the pre-application phase of the planning process to meet the satisfaction of Council, and Ofsted regulations.

Primary education

4.46 In accordance with the Council's Planning Obligation SPD, provision of funding to improve educational facilities to support the new residents will be required. The nearest existing primary schools will be unable to cope with the additional demands arising from any new residential development on the site, without necessary improvement and funding.

Secondary education

4.47 The nearest existing secondary schools will be unable to cope with the additional demands arising from any new residential development on the site, without necessary improvement and funding. Contributions in accordance with the provisions of the Council's Planning Obligations SPD will be required towards additional high school places in the locality. Improvements to ensure safe pedestrian and cycle access to the nearest high school will also be required. Details of the student movement will be required to be addressed as part of the Transport Assessment and Travel Plan/s.

<u>Post 16</u>

4.48 The redevelopment of the site will need to consider the education needs of post 16 age students. Contributions in accordance with the provisions of the Council's Planning Obligations SPD will be required towards additional post 16 places, and the specific needs and opportunities for this group will need to be considered in preparing any plans for redevelopment of the site.

Health Facilities

4.49 PPS1, and London Plan policy 3A.21 Locations for Health Care, identifies good access to key services for all members of the community as a requirement to achieve sustainable and inclusive development. The development of the site will impact on the ability of primary care services in West Drayton and Yiewsley to provide health care for the local population, as services are already limited in their capacity. Crucially, the PCT must expand services provided by GPs, so that new residents are able to register with a GP. Apart from GP primary care services, there would also be demands on district nursing, health visitor and other primary and community health services such as dentistry, chiropody, speech and language and physiotherapy. The needs of the new population expected on the site are unlikely to be met by existing local health services. Additional provision will be required and these details will need to be determined between the Council, the Hillingdon PCT, and the developer. However, significant improvements will be expected, and it is expected that a health facility to accommodate a number of GP's and associated services doctors surgery will be provided on site.

4.50 Saved Policy R17 enables the provision of community infrastructure as a consequence of new development. Planning obligations will be sought for the provision of a new local health facility to serve the new population based on the proportional impact of the new residential development, in accordance with the Council's Planning Obligations SPD.

4.51 The need to locate health facilities in accessible locations to maximise public transport access is also promoted through PPG13. The preferred location for a local health facility is in a location accessible to the new residential population and preferably in connection with other local community facilities.

4.52 Assessment of the health needs of the new population will be required. Identification of the type and location of the health facility and its timing should be provided with the planning application. This should aim to ensure the health facility is available at the time of occupation of new residential development to ensure that there are no adverse impacts on existing health services and existing residents.

4.53 A Health Impact Assessment will need to be submitted to support a planning application for redevelopment of the site. as part of the Environmental Impact Assessment should be provided. Further guidance on this is provided through the

Health and Urban Planning Toolkit published by the NHS. Consultation with the local PCT and the Council will need to be undertaken in the preparation of the scope of this assessment.

Other Community Facilities

4.54 In redeveloping this site and providing a significant number of additional homes, the provision of community facilities will need to be an integral component from the outset. PPS 1 states that the Government is committed to developing strong, vibrant and sustainable communities and to promoting social cohesion. Any planning applications will need to demonstrate how these objectives will be achieved across the site and the surrounds, particularly the adjoining residential areas. London Plan Policy 3A.18, at paragraph 3.100, notes that accessible and affordable community facilities are key to enabling the community to function. While there will be access to amenities and facilities in West Drayton town centre, there will also be a need for local community facilities for the new population. It is considered particularly important to build and foster a sense of place and community in this specific location, and to ensure that the new residential development is integrated into the existing local community.

4.55 The provision of facilities will need to consider the homezone concept and to help create walkable neighbourhoods and places that encourage passive and active social interaction, surveillance and engender a "sense of place" and "sense of community". A 'community node', with public buildings, community facilities and small locally run convenience shops, will be required on or adjacent to the site, with particular consideration of the existing shops at site B. The size of a facility will need to accommodate the potential users. Detailed studies of housing numbers and walking distance will be necessary to ascertain the requirements for the site. Where buildings will be available for public uses and community groups, these should be designed in collaboration with established local community groups, such as those identified in the Council's Statement of Community Involvement (SCI), and through further consultation with local residents and the Council through the planning process.

4.56 The timing of the provision of facilities will be negotiated at the planning application stage and will need to be provided concurrently with residential development to meet the needs of residents as they occupy the site. Provision for such facilities will be sought in accordance with the requirements of the saved Policy R17, and be within easily accessible locations reached- by walking, cycling and public transport for the population that will use them, with consideration given to other modes of transport.

4.57 All groups within society will need to be considered in developing a masterplan for the site, and any other **future** planning applications. The needs of the elderly, children, youths, different religious groups, people of different cultural backgrounds, and all sectors of society should form the basis in developing a spatial plan for the site. The Council's Statement of Community Involvement identifies a number of key

groups that should be involved in developing proposals prior to submission of a planning application. Developers will be expected to work with the Council in consulting widely on draft masterplan proposals and engaging different groups in the planning process.

4.58 Existing groups that utilise the site and offer a positive community benefit should be accommodated through appropriate redevelopment. It is expected that the **The** Air Training Corp **facilities** will be retained on the site and that only appropriate development will be permitted immediately adjacent to this facility, with specific consideration given to access, security, amenity and other issues. Consideration will also need to be given to facilitate/enable the creation of new community groups as the development is progressed.

4.59 The needs of faith groups should also be considered, with reference to the GLA commissioned report: "Responding to the Needs of Faith Communities: places of worship", and any emerging policies.

5 Sustainable Development

5.1 The general development approach must be one that creates sustainable communities and a liveable environment. The development should create enjoyable places to call home, and spaces to enjoy with other residents, whilst limiting greenhouse gas emissions and other adverse impacts on the natural and built environment. There are a range of initiatives that must be explored in preparing plans for the redevelopment of this site, and any applicant would be expected to work closely with the council and key stakeholders through the pre-application process to ensure the most economically, socially and environmentally sustainable outcomes, with a special emphasis on climate change.

Environmental Impact Assessment

5.2 An Environmental Impact Statement is very likely to be required to accompany any planning application in accordance with the requirements of the Environmental **Impact** Assessment Regulations (1999) or as amended. The preparation of the EIA is obviously a key component in ensuring the sustainable development of the site, and the best outcomes for the development. In accordance with best practice it is expected that the EIA will be an extensive study of the relevant issues specific to this site. Although Schedule 4 of the EIA Regulations provides general guidance on this, the specific environmental impacts identified as likely to arise from this development will dictate the form and scope of the EIA, together with the issues that arise through consultation.

5.3 In addition to Circular 2/99, the EIA regulations, and best practice, there is a range of relevant case law, and examples of best practice the Council expects from the EIA process. The Council anticipates that any developer will undertake extensive consultation with the relevant authorities and various local groups and individuals through the planning process, particularly where this input would add value to the assessment of likely environmental impacts. The purpose of the Environmental Impact Assessment should not be about justifying a preconceived development proposal, but rather an iterative process to encourage public participation throughout **its preparation and implementation** to ensure the most suitable and sustainable use of the site. In addition, the Council expects to be involved throughout, particularly given the wide range of issues and scenarios to be considered, and the need for a central co-ordination point.

Climate Change

5.4 The London Plan, Planning Policy Statement 1 and supplement to PPS 1 state that dealing with climate change is an integral and essential part of the development process. The London Plan specifically states that dealing with climate cannot be considered as a set of "add ons" and must be integral to the development process. The Government has recently announced very ambitious targets to limit greenhouse emissions through the Climate Change Act, 2008 and there is a wide range of planning

policies and building control regulations that will assist in achieving the targets. Any proposals for the site will need to demonstrate that measures to mitigate against climate change, by limiting greenhouse gas emissions, and adapting to the already inevitable impacts of climate change, through layout, design and a range of other measures, are integral to the masterplan and detailed planning applications. In striving to plan for sustainable communities a lot of the initiatives that will limit greenhouse gas emissions and adapt to inevitable climate change will overlap with beneficial environmental, economic and social outcomes. Such initiatives will need to be demonstrated at the planning application stage, through various studies, the design and access statement, design codes, energy statements, sustainability statement, a framework travel plan, and a range of other details. Impacts of climate change must also be taken into account in considering flood risk, including SUDS throughout the development, coping with extreme weather conditions, including heat, cold, storms and other weather, as would normally be considered with any such large scale proposal. Climate change must also be considered as part of sustainable design and construction requirements. Further details are in this chapter and cross-referenced to London Plan Policies 4B.1 and under Part 4A along with the range of emerging documentation and government policy on this subject.

5.5 Given the size and scale of the site, the innovative design solutions available, an improving general understanding of climate change and sustainability issues, emerging technology and other developments, the proposed redevelopment of this site should aim to be an example of best practice sustainable development for London.

Trees, Landscaping and Ecology

5.6 Mature trees, shrubs, and other vegetation provide a visual screen and a buffer to help attenuate the effects of noise alongside the Great Western Railway line. It is also likely to act as a wildlife corridor providing a valuable habitat for many species. There are significant individual and groups of trees on the Porters Way frontage and within the site. Any masterplan should be informed by a full tree survey and arboricultural report, to ensure that as many as possible of the existing mature and semi-mature trees are retained. Trees and other suitable vegetation should be utilised in good juxtaposition with new buildings and spaces. Careful use of landscaping can give the development its own identity and enhance its general character and layout. Landscaping can also be used to provide an important buffer between the new development and existing housing.

5.7 A high standard of landscape design should be provided as part of any development. This should be carefully considered at an early stage in the design process. The proposed development and its design should take full account of the merit of the existing trees which can with careful detailing and design be retained to provide long-term tree cover. Re-development of the site will need to promote the concept of urban greening, create natural connections, provide opportunities for physical activity, relaxation and healthy living, and other natural spaces.

5.8 A full biodiversity assessment should be carried out and submitted with any planning application, including any mitigation measures that may be required.

Aviation safeguarding requirements

The site is located in an area in close proximity to Heathrow Airport and as such 5.9 any new developments will need to ensure there are no adverse impacts on the safe and effective operation of the aerodrome. New buildings will need to be sited and designed to ensure they do not pose a potential hazard or risk to aircraft utilising Heathrow or associated radar equipment, and this will apply to temporary structures such as construction cranes. It should be noted that 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. Development proposals will need to demonstrate that they avoid navigational and other hazards. Landscaping, and SUDS, will need to comply with Advice Note 3 'Potential Bird Hazards from Amenity Landscaping and Building Design'. The type and spacing of trees and design details of any water features will need to be discussed with the Local Planning Authority, and CAA and BAA, prior to submission of an application. Berry bearing species should be minimised to 25 5% of the total planting palette. The dense planting of evergreen species should be avoided so that exploitable roosting habitats for hazardous species are not formed. Trees should be 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 Pinus Sylvestris and Oak Quercus Robur should be avoided as these species form dense canopies and will also be attractive to pigeons and corvids. In designing the scheme reference must be made to BAA Advice Note 3 'Potential Bird Hazards from Amenity Landscaping & Building Design'.

Sustainable drainage

5.10 The site is not within an area of fluvial or tidal flood risk. However any proposals should contain a surface water drainage strategy to include proper provision for drainage to ground, watercourses or surface water sewer(s). Schemes should be designed in consultation with the Environment Agency to limit surface water runoff and help prevent and alleviate the risk of flooding. Water attenuation measures should be included to reduce peak flows of surface water runoff to the drainage system. Proactive design solutions to integrate surface water in the landscape design, such as sustainable drainage systems (SUDS) should be encouraged. Any proposals for development over 1 ha should be accompanied by a surface water Flood Risk Assessment, in accordance with PPS25 (see also Development and Flood Risk Practice Guide June 2008).

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5.11 In accordance with London Plan Policies 4A.3, 4A.9 and 4A.14, a sustainable urban drainage system (SUDS) and sustainable design and construction techniques will be required for the site. The use of SUDS will need to be developed through the planning process, with the aim of controlling water runoff as close to its origins as possible and with the aim of reducing flood risk downstream in accordance with the Council's SFRA and the Mayor of London requirement to achieve greenfield discharge rates on all new developments. In accordance with Policy 4A.14 the Council will seek to ensure that surface water run-off is managed in line with the following drainage hierarchy:

- store rainwater for later use
- use infiltration techniques, such as porous surfaces in non-clay areas where ground conditions permit.
- attenuate rainwater in ponds or open water features for gradual release to a watercourse
- attenuate rainwater by storing in tanks or sealed water features for gradual release to a watercourse
- discharge rainwater direct to a watercourse
- discharge rainwater to a surface water drain
- discharge rainwater to the combined sewer.

Discharges to watercourses or sewer systems must be controlled to an appropriate greenfield run off rate. The surface water strategy for the site must include an assessment of the current drainage regime including identification of existing discharge points and quantities. All calculations should be to a 1:100 year level plus allowances for climate change as set out in PPS25. The proposals should aim to achieve an overall net flood risk reduction where possible.

5.12 Sustainability initiatives, such as minimising water use and protecting and enhancing green infrastructure should be taken into account in the design. SUDS proposals for the overall site should be designed in at the earliest stage, along with the overall street layout, landscape and open spaces strategies and other considerations. The Mayor of London believes that managing London's surface water and combined sewer flooding/overflows should start with source control management - improving the permeability of the public realm through the incorporation of rainwater harvesting and sustainable drainage - before proceeding to enhanced drainage capacity. These techniques include permeable surfaces, storage on site, green roofs, infiltration techniques and even water butts. A 'watercourse' is identified on the site and opportunities to open culverts and naturalise river channels should be explored in accordance with London Plan policy 4C.3. Many of these techniques also have benefits for biodiversity by creating habitat, and some can help to reduce the demand for supplied water. Consideration should also be given to public health, safety and usability of open spaces, and airport safeguarding in designing such schemes. Further information is available from the Environment Agency in the

document "SUDS – A Practical Guide" 2006, and designs should be developed in consultation with the Council, the Environment Agency, Thames Water and other stakeholders.

5.13 Given the nature and scale of the development of the site an indication of sequencing should be provided with the planning application for key infrastructure such as water, wastewater and roads, erosion and sediment control, including phasing of the development of the site.

Air Quality, Noise and Contamination

Air Quality

5.14 The site is within an Air Quality Management Area (AQMA), and developers will need to demonstrate compliance with the Council's Air Quality Action Plan. This will have implications for the suitability of activities such as biomass (and other) fuelled CCHP plants, traffic generation, and other potentially polluting activities. Liaison should be undertaken with the Council's Environmental Protection Unit as to the suitability of such proposals. The Mayor's Air Quality Strategy seeks to minimise the emissions of key pollutants and to reduce concentrations to levels which no or minimal effects on human health are likely to occur. One of its main aims is to reduce pollution from road traffic emissions. Implementation mechanisms for improving air quality in the AQMA are set out in Hillingdon's Air Quality Action Plan (AQAP). Land use proposals for the site should be consistent with the London Plan policies and the targets in the AQMP, in particular through addressing the reduction in traffic and the provision of targets in a Travel Plan.

5.15 There is a range of legislation that needs further consideration in undertaking any air quality impact assessment, and as part of the planning process for the site, these include:

- Air Quality Strategy for England, Scotland, Wales and Northen Ireland, July 2007;
- Air Quality Standards Regulations 2007;
- EU Ambient Air Quality Directive 2008/50/EC which now incorporates Air Quality Daughter Directive 1999/30/EC and Air Quality Framework Directive 1996/62/EC, this came into force on 11th June 2008;
- Cleaning London's Air, the Mayors' Air Quality Strategy, 2002;
- London Councils Air Quality and Planning Guidance 2007;
- GLA London Best Practice Guidance: The control of dust and emissions from construction and demolition, 2006

5.16 Policy OE6 of the Hillingdon Unitary Development Plan requires consideration to be given to air pollution. Air quality objectives are also provided in the London Plan. Revised Planning Policy Guidance Note 13 (Transport) emphasises the importance of local air quality as a key consideration in the integration between

planning and transport. The site falls within an Air Quality Management Area (AQMA) as designated in the Council's adopted Supplementary Planning Guidance on Air quality and an air quality assessment will be required for any development proposals.

5.17 The Council's Supplementary Planning Guidance on Air Quality states that development will be restricted or otherwise discouraged in those areas where the air quality exceeds the objectives especially where this involves the introduction of residential accommodation, and hence further public exposure, into an area of recognised poor air quality. In such cases, steps should be taken to protect these areas to ensure that the quality of air is not allowed to deteriorate further and put in place measures to secure air quality improvements.

5.18 In terms of helping to minimise any air quality impacts associated with future development, sustainable travel measures will be required and consideration should be given in the design phase to incorporate measures such as the use of energy efficient technology and design to ensure the construction of a zero/low emissions development.

<u>Noise</u>

5.19 Hillingdon's SPD on Noise indicates that the Railway line (where adjacent to the site) falls within a corridor identified as having significant issues of noise in respect to residential development.

5.20 Hillingdon's SPD on Noise (April 2006) sets out the Council's approach to noise sensitive development with the main aim of physical separation. Measures to address noise issues for sensitive development should be designed from the outset, rather than retrofitted. Other possible noise sources may be aircraft noise from Heathrow and possible noise issues from activities associated with future retail/commercial elements of the scheme, along with other activities such as waste management facilities, general residential use, and surrounding and internal roads. The Air Cadet HQ adjacent to Rutters Close holds parades that involve shouting, including the final parade that takes place as late as 2200 hours. Marching band practice also occurs, and these uses will continue to take place. Any redevelopment proposals will need to address these issues.

5.21 An assessment of noise impacts in accordance with the Mayors Ambient Noise Strategy and Hillingdon's Noise SPD should be undertaken and measures to ensure no adverse impacts will result for new residents, or existing surrounding residents shall be demonstrated at the planning application stage.

Site contamination

5.22 PPS 23: Planning and Pollution Control sets out the Government's objectives for contaminated land, which are to identify and remove unacceptable risks to human health and the environment and seek to bring contaminated land back into use. Model Procedures Contaminated Land Report II (Model Procedures for the management of

Land Contamination) also provides guidance for developers and government in dealing with potentially contaminated land and this will be utilised in assessing any planning application. In addition any application will need to demonstrate compliance with Hillingdon's SPG on Land Contamination, or any subsequent SPD or policy guidance that replaces it. **Any planning application will also need to address the Environment Agencies Groundwater Protection: Policy and Practice (GP3).**

5.23 Consideration should also be given to any likely contamination arising as part of any previously "made ground" or any possible fill material. Asbestos contamination, ground gas contamination in relation to fill, hydrocarbon's (including vapours) and implications for water pollution will need to be fully considered. Investigations will be required to ascertain the level of contamination across the site, and proposals for mitigation and remediation will need to demonstrate that no adverse impacts will arise. This information must be submitted to the Local Planning Authority at the appropriate time for any proposals to redevelop the site. Measures will be required to ensure that contamination is not activated or spread during demolition or construction on the site. In assessing this issue and any proposed mitigation, implications for other proposals on the site such as the use of SUDS and any earthworks should be addressed as proposals are developed and clearly demonstrated through any planning application.

Archaeological appraisal

5.24 Whilst the site does not lie within an archaeological priority area, unless a waiver is granted by English Heritage, An archaeological desk based assessment shouldwill need to be submitted to support any planning application to redevelop the site. be included as part of the Environmental Impact Assessment. This will need to be conducted by a recognised archaeological organisation to the standards of the Greater London Archaeology Advisory Service (GLAAS). This report should also allow for any archaeological mitigation and may include recommendations for excavation and further investigation. The preparation of an archaeological assessment should be undertaken in consultation with the Council and English Heritage.

Waste management

5.25 PPS10 – Planning for Sustainable Waste Management requires a more sustainable approach to waste management, moving the management of waste up the 'waste hierarchy' of reduction; reuse; recycling and composting; using waste as a source of energy; and, only disposing as a last resort.

5.26 Given the size of the site, a site-wide waste management strategy will need to be submitted with any planning application, to reduce conventional levels of waste, demonstrate compliance with PPS 10, and demonstrate that an innovative solution to manage waste across the site, and the immediate surrounds if appropriate, has been considered. This should also address the requirement to reduce demolition across the site and maximise the re-use and recycling of demolition waste, if no suitable alternative for existing buildings is found.

5.27 Any planning application must provide details of the design of waste and recycling collection facilities. Residential and commercial developments must include dedicated storage and collection facilities for waste and recyclable materials at ground floor level, in easily accessible, safe, secure and convenient locations. Minimal visual intrusion and protection of amenity will be sought in these locations. Street layout, housing design, open space and the public realm will need to consider collection, management and disposal of public and domestic waste. Applications will need to clearly illustrate that whilst facilities for refuse collection vehicles are provided in the street layout, alternative solutions to improve the layout, in accordance with the "homezone" principles, and the interests of providing a high quality liveable environment for the future residents and ensure a quality accessible environment are provided. A strategy for waste management will therefore need to be incorporated into the masterplan and other proposals.

5.28 The Council will require applicants to provide details of the design of waste and recycling storage and collection facilities with any planning application as part of a site wide waste management strategy. Residential development must include dedicated storage and collection facilities for waste and recyclable materials at ground floor level. The location and design of waste and recycling facilities must be considered as an integral part of the design of any scheme. Facilities should be located in positions that are convenient for residents and for collection while ensuring minimal visual intrusion and not adversely affecting the amenities of residents. The facilities should be positioned and designed to take account of the safety and security of users.

5.29 To encourage more effective resource management in demolition and new build, an 'audit trail' will be required to be set up for demolition materials based on an established demolition protocol. The protocol should demonstrate that the most valuable or potentially contaminating materials and fittings could be removed from the site safely and remain intact for later re-use or processing.

Energy

5.30 PPS 22 - Renewable Energy, outlines the governments preferred approach to planning for renewable energy, and encourages small-scale renewable energy projects in all new developments. The London Plan and the Mayor's Energy Strategy also outline the requirements for renewable energy. In accordance with the London PlanPolicy 4A.4 *(Energy assessment)*, an assessment of the energy demand and carbon dioxide emissions will be required, with an holistic approach to accounting for CO2 emissions, embodied energy and similar considerations. Details of this are contained within the London Plan and the Mayor's Energy Strategy. In particular energy assessment and sustainability assessment will need to demonstrate the expected energy measures incorporated in the development, including the feasibility of combined cooling, heat, and power (CCHP), combined heat and power (CHP) and community heating systems. This assessment should form part of the sustainable design and construction statement.

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5.31 Developers will be required to demonstrate compliance with London Plan Policy 4A.6 (*Decentralised Energy: Heating, Cooling and Power provision*) illustrating that their heating, cooling and power systems have been selected to minimise carbon dioxide emissions. The need for active cooling systems should be reduced as far as possible through passive design including ventilation, appropriate use of thermal mass, external summer shading and vegetation on and adjacent to developments. The heating and cooling infrastructure should be designed to allow the use of decentralised energy (including renewable generation) and for it to be maximised in the future. In this regard, consideration of these issues will need to be incorporated into the masterplan and initial planning applications.

5.32 CCHP and CHP systems should be evaluated for the suitability to this site, and the immediate surroundings. It needs to be recognised that there will be height, location, management and emission issues, and other material considerations that will need to be assessed as part of any proposals.

Given the size and scale of the project, and the opportunities this presents, 5.33 developers will need to demonstrate that every endeavour has been made to limit greenhouse gas emissions arising from development of the site. This can be achieved through the design phase and with attention given to thinking about how the buildings will function and how residents and visitors will live and work on and around the site. In accordance with the current London Plan Policy 4A.7 (Renewable Energy), the development should achieve a reduction in carbon dioxide emissions of 20% from on-site renewable energy generation (which can include sources of decentralised renewable energy). Proposals will also need to comply with PPS1 and the supplement to PPS 1, in showing that innovative solutions have been explored through the design phase of the project. The 20% reduction in CO₂ emissions should be viewed as a minimum requirement and developers will be required to demonstrate that developments will aim to limit greenhouse gas emissions further than this target, subject to financial viability and other logistical considerations. Developers should engage in discussions with the Council, the GLA and other key stakeholders in developing proposals for the site.

Sustainable Design and Construction

5.34 The Code for Sustainable Homes - Technical Guide was published by the Department for Communities and Local Government in April 2008. It sets out the requirements for the Code, and the process by which a Code assessment is reached. The accompanying Code for Sustainable Homes: Setting the Sustainability Standards for New Homes, details the assessment process and the performance standards required to meet the different Code levels.

5.35 Consistent with the aspiration for low carbon development, all new housing developments on the site should achieve, as a minimum, the requirements of Level4. However, the achievement of levels 5 or 6 of the Code are strongly encouraged

for any site proposals, wherever these are feasible. Any commercial development should endeavour to achieve a BREEAM "excellent" rating, unless it can be justified why this cannot be achieved.

5.36 In accordance with London Plan Policies 4B.1 and 4A.9 any proposals should contribute to the mitigation of the effects of climate change which includes minimising overheating and heat island effects, managing solar gain in summer, contributing to reducing flood risk, minimising water use and protecting and enhancing green infrastructure.

5.37 The London Plan Policy 4A.3 (*Sustainable design and construction*) encourages development to meet the highest standards of sustainable design and construction. This sets out a number of objectives. These requirements must be addressed as part of site development proposals. In accordance with this policy, a statement on the potential implications of the development on sustainable design and construction principles will be required, including energy. It should also address the demolition, construction and long-term management phases of the project.

5.38 It should be noted that a number of potential issues need particular consideration on this site given the safeguarding requirements of Heathrow Airport. Consideration will need to be given to the impacts of reflective materials and panels, the heights of all structures, turbines (and similar navigational hazards) and the need to limit the risk of bird strike through limiting habitat for large birds in landscaping design, CAA advice note .. provides more detailed guidance on this issue. In addition the site is in an Air Quality Management Area, which will affect emissions such as the use of biomass and other fuels. Such information will need to be included with any planning application for the site. Liaison will be required with the relevant BAA safeguarding, CAA, NATS, the London Borough of Hillingdon and other relevant parties, as part of the pre-application process.

Overheating

5.39 Any proposals for the site, including a masterplan, should be designed to avoid overheating of buildings and the public realm and avoid excessive heat generation in accordance with London Plan Policy 4A.10. Any proposals should demonstrate how development is, as far as practicable, designed to provide an appropriate living and working environment for the likely weather conditions, including extreme heat, through heat resilient design, construction and operation as part of site proposals.

Living roofs and walls

5.40 Development on site will be expected to incorporate living roofs and walls in accordance with London Plan Policy 4A.11. Developments should help to enhance biodiversity, absorb rainfall, improve the performance of the building, reduce the heat island effect, provide amenity space and improve appearance. This will be particularly encouraged for those developments with strategic views to and from the site and to

enhance the character of the wider area. Additional advice is included in the Environment Agency's "Green Roof Toolkit", and the Mayor of London's "Living Roofs and Walls" document. Design and selection of vegetation should consider the ability to enhance the current ecological values and aesthetic quality of the site, but must also give due consideration to aviation safeguarding (bird strike) constraints in consultation with BAA safeguarding and the London Borough of Hillingdon.

Water supply and wastewater management

5.41 Water should be considered a precious resource not to be wasted. Rainwater harvesting, limits on consumption of water and re-use of the various forms of waste water will need to be designed into the fabric of any masterplan, design codes and detailed planning applications in accordance with London Plan policy 4B.14.

5.42 Early discussions with the relevant water and wastewater providers (currently Three Valleys Water and Thames Water respectively) should be undertaken to ensure adequate provision and no undue impact on the surrounding network. The redevelopment of this site will be seen as an opportunity to significantly improve current infrastructure and to mitigate against any future problems with infrastructure. The planning of underground services, and other water and wastewater management will need to be considered along side the master-plan and planning applications.

5.43 Any proposals for the site should incorporate water conservation measures including water saving devices, greywater and/or rainwater recycling in all buildings to significantly reduce potable water consumption in both residential and non-residential buildings in line with the other objectives outlined in this SPD.

5.44 In accordance with London Plan Policy 4A.16, a maximum water use target of 105 litres per person per day for residential development should be addressed as part of site proposals. However given the long time frame for the site it is recommended where possible a target of 80 litres per day per person should be considered (Sustainable Homes level 6). This may be adjusted through reviews of future planning documents, which will take into account the then prevailing standards in the Code for Sustainable Homes. Measures to reduce consumption should include low water use appliances and fittings for both residential and commercial development (as appropriate). The Mayors latest proposals include the investigation into the feasibility of water neutrality. This site could contribute to providing examples of best practice for such initiatives.

Sustainable Exemplar Development

5.45 London Plan Policy 4A.7 (Renewable energy) seeks the provision of sites for zero carbon development and this is reflected in the Mayor's Energy Strategy which seeks one in every Borough by 2010. As part of the wider sustainability objectives for the site and as part of the overall aspiration to create an exemplar development, the nomination of a site for and development of at least one Code Level 6 development

would be a unique opportunity as part of the proposals for redevelopment of the former NATS site. Such a scheme could be reflected in the master plan with specific requirements set out in the design codes. The location, timing and size of the development should reflect the aspiration to achieve the Mayor's target and the proposal should also be a development of exceptional design quality, sympathetic to the surrounding area, and enhancing the architectural appeal of the site.

5.46 The Mayors' Energy Strategy states that zero-carbon developments are highly energy-efficient developments, powered and heated by renewables with zero net carbon emissions. Zero-carbon developments represent an almost complete solution to many of the issues that the Energy Strategy is seeking to address. They are typically mixed use, including housing, office and retail, which contribute to more sustainable living patterns as well as helping to balance heat and electricity loads. Zero-carbon developments also aim to reduce the need for private car use through transport plans, and focusing on good pedestrian and cycling facilities as well as good links to public transport.

6 Planning Obligations

6.1 In accordance with the provisions of ODPM Circular 05/2005 – Planning Obligations, the Council's Planning Obligations SPD (2008) and relevant UDP Saved Policies, contributions from the developer will be sought through a s106 agreement, along with s278 agreement, as part of the development proposals on the site. Compliance with London Plan Policies 6A.4 and 6A.5 will also need to be demonstrated. The Council's Planning Obligations SPD outlines the expected contributions, and an initial desktop study indicates a number of planning obligations that will be required. A critical aspect of the planning obligations will be to ensure that if the proposal is to be phased then provision will be required in any resulting legal agreement/s to ensure the necessary infrastructure is delivered to meet the needs of the new residents prior to occupation of the new dwellings, specifically s278 works would be sought. The s106 and s278 agreements will be subject to detailed studies and negotiations, however as a starting point the obligations are likely to include:

- **Transport and transport related issues:** In line with the SPD on Transport, a. Accessibility, Air Quality and Noise, a contribution towards public transport will be required. This could come in the form of improvement to existing, or new, bus routes and bus stops, the creation of new cycle ways and improvements to existing cycle-ways, improvements to encourage walking and improve the pedestrian environment on and around the site, general improvements to accessibility particularly to facilitate access to public transport and the West Drayton town centre, a framework travel plan and detailed travel plans across the site. Contributions towards the preparation or implementation of the British Waterways waterspace strategy may also be requested. It is also likely that a s278 agreement will be required to undertake any and all works on highway's land as a result of this proposal, including site access works, junction improvements and road safety measures such as pedestrian crossing facilities. Improved accessibility by public transport should be fully explored and the opportunities must be discussed with GLA, TfL, and the Council, along with the Highways Agency where appropriate, prior to the submission of any planning application.
- b. Affordable Housing: In line with the SPD on affordable housing and planning obligations a financial viability appraisal (FVA) will be required to demonstrate compliance with the London Plan. In the event that the applicant is not proposing to to provide 50% of the development as affordable housing then a financial viability appraisal (FVA) will be required to demonstrate the level of affordable housing that can be delivered from the scheme. to demonstrate that every effort has been made to provide up to 50% affordable housing on the site in accordance with the London Plan and current guidance. Supporting information will be sought to enable the critique of an FVA, including valuation data, existing use values, construction costs, sales date along with details on the

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Former National Air Traffic Services (NATS) site, Draft SPD

cost of other aspirations for the site and similar information required to reach a decision on the amount of affordable housing that can be viably provided on the site. The developer will be expected to fund independent assessment of the FVA.

- c. **Education**: In line with the SPD on Educational Facilities a contribution towards nursery, primary, secondary and post 16 school places and/or facilities will be sought. There is a formula for ascertaining the likely level of this contribution within chapter 4 the SPD on Planning Obligations. Given the lack of capacity of existing nursery facilities, it is likely that a nursery will be required on site to support the new population.
- Health: The development of the site will impact on the ability of primary care d. services in West Drayton and Yiewsley to provide health care for the local population, as services are already limited in their capacity. Crucially, the PCT must expand services provided by GPs, so that new residents will be able to register with a GP. Apart from GP primary care services, there would also be demands on district nursing, health visitor and other primary and community health services such as dentistry, chiropody, speech and language and physiotherapy. In line with the SPD on Health Facilities a contribution will be sought as a result of this proposal. Given the size of the site it is likely that the additional demand will necessitate significant improvements to the health facilities in the area, and the provision of a GP surgery on site, or significant improvements to existing facilities will be required. Recent advice indicates that a new polycliniclarge health centre is expected within the Yiewsley town centre, and significant contributions may be required to assist in the funding of such facilities. Further more detailed consultation will be required with the Hillingdon PCT, the NHS and Council prior to any decision being made.
- e. **Community Facilities**: In line with the Planning Obligations SPD, a facility or number of facilities are likely to be required on site, and/or cash contributions sought as a result of this proposal. **Additional contributions towards ongoing maintenance/management of such facilities may also be required.** Further scoping work is required and any developer will be expected to work with the Council in developing proposals for the site to comply with the aspirations of this SPD. Given that Council owns the site immediately adjacent to the former NATS site, and the need to make substantial improvements to community facilities in the area, the opportunity to consolidate and enhance facilities as part of this development.
- f. **Open Space**: In line with the SPD on Open Space and Recreation contributions will be sought to improve and enhance existing facilities. The developer, in association with Council's Green Spaces Team, will need to undertake a needs and deficiency assessment of the site, its location and any other constraints i.e. through consultation with bodies such as Sport England. Contributions towards the management of open space, areas of ecological importance and other costs

associated with the upkeep of the site will be required. As a minimum, an assessment of the following will be required:

- i. Sports pitches and district parks, in association with Sport England and Natural England and the Council;
- ii. Local parks, small parks and pocket parks, in association with Sport England, and Natural England and the Council;
- iii. Play space for children, with consideration of the Mayor's SPG, and in keeping with the nature and scale of the proposal
- iv. Sports halls in the locality and their capacity
- v. Pool space in the locality and ability for contributions to assist in any expansion or future expansion.
- g. **Public Realm**: In line with the SPD on the Public Realm, given the location and possible mixed use aspects of the site, then it is likely that a contribution towards the public realm will be sought as a result of this proposal. This may take the form of public realm improvements, accessibility measures, the provision and maintenance of public spaces, street furniture and lighting, public art, litter management, crime prevention and CCTV, both on site and off site. Particular emphasis will be given to improvements around any proposed commercial elements of the scheme **and** the existing local shops **at Mulberry Parade**, **the grand union canal** and linking the site with the West Drayton town centre.
- h. Construction Training: In line with the SPD on Training and Employment, a contribution or on site scheme to meet the training needs of our community is likely to be sought as a result of the proposal. If an on site scheme is not implemented then it is likely that a cash contribution equal to £2,500 for every £1million construction cost will be sought plus it is likely that an additional contribution towards co-ordinator costs (an estimate of the cost of a co-ordinator is £71,675 pa for every 160 units proposed) may be sought.
- i. **Air Quality and Noise**: In line with the SPD on Transportation, Accessibility, Air Quality and Noise, a contribution or scheme to mitigate against or ameliorate the impacts arising from the development is likely to be required.
- j. **Environmental Improvements**: The protection, enhancement, provision and **maintenance** of additional landscaping and trees, will be expected of the developer, along with the protection and enhancement of areas of ecological and biodiversity importance, and other associated issues as identified through this SPD.

k. **Project Management and Monitoring**: In line with the SPD, a contribution towards project management and monitoring is sought equal to 5% of the total cash contributions secured from this proposal.

Obtaining information in your language

If you would like information about Hillingdon Council's services in your own language please ask an English speaker to phone 01895 250111 on your behalf.

Albanian

Ne se kerkoni informacion ne gjuhen tuaj rreth sherbimeve qe ofron Keshilli i Hillington-it,ju lutem kerkojini dikujt qe flet anglisht te telefonoje ne emrin tuaj ne numrin 01895 250111.

Bengali

আপনি যদি হিলিংডন কাউন্সিলের সেবাসমূহের ব্যাপারে আপনার নিজের ভাষায় তথ্য পেতে চান, তাহলে ইংরেজী ভাষায় কথা বলেন, এমন কাউকে আপনার পক্ষ থেকে 01895 250111 নম্বরে টেলিফোন করার জন্য দয়া করে অনুরোধ করুন।

Polish

Jeśli pragną Państwo otrzymać informacje o usługach Rady Hillingdon w swoim języku ojczystym, prosimy zwrócić się z prośbą do osoby znającej język angielski, by w Państwa imieniu zadzwoniła pod numer 01895 250111.

Punjabi

ਜੇ ਤੁਹਾਨੂੰ ਹਿਲਿੰਗਡਨ ਕਾਉਂਸਿਲ ਵਲੋਂ ਦਿੱਤੀਆਂ ਜਾਣ ਵਾਲੀਆਂ ਸੇਵਾਵਾਂ ਬਾਰੇ ਜਾਣਕਾਰੀ ਤੁਹਾਡੀ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਚਾਹੀਦੀ ਹੈ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਕਿਸੇ ਅੰਗਰੇਜ਼ੀ ਬੋਲਣ ਵਾਲੇ ਨੂੰ ਕਹੋ ਕਿ ਉਹ ਤੁਹਾਡੇ ਵਲੋਂ ਇਸ ਨੰਬਰ 'ਤੇ ਫ਼ੋਨ ਕਰੇ - 01895 250111

Somali

Haddii aad jeclaanlahayd wararka ku saabsan adeegyada Hillingdon Council in aad ku heshid Luqaddaada,fadlan waydiiso qof ku hadlo luqada af ingiriiska in u ku diro Teleefoonkan 01895 250111.

Tamil

உங்கள் சொந்த மொழியில் ஹிலிங்டன் உள்ளூராட்சி மன்றத்தின் சேவைகளைப் பற்றி நீங்கள் அறிய வேண்டுமானால் தயவுசெய்து உங்களுக்காக ஒரு ஆங்கிலம் பேசுபவரை 01895 250111 தொலைபேசியில் அழைக்கச் செய்யவும்.

Urdu

اگرآ پ ہلنگڈن کونسل کی خدمات کے بارے میں، اپنی زبان میں معلومات حاصل کر نا چاہتے ہیں تو ہرا ہے کرمانگریزی بولنے والے کس فرد سے گزارش بیچئے کہ دہ آپ کی طرف سے کا 25011 1895 پڑ پلیفون کریں ۔

This information is also available in large print, Braille and on audio tape.