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TRANSDEV

*VEHICLE MAINTENANCE AREA  
&  
STAFF CAR PARKING AREA*

LAND TO THE NORTH & SOUTH OF CHERRY YARD,  
HOLLOWAY FARM, HARMONDSWORTH ROAD,  
UB7 9JS

Highways Appeal Statement



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**HIGHWAYS APPEAL STATEMENT**

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|----------|---------------------------------------------------------------------------------------------------------------------------|
| Author:  | Paul Mew Associates                                                                                                       |
| Date:    | October 2017 [version 2]                                                                                                  |
| Project: | PI571: Holloway Farm – 1. <i>Vehicle Maintenance Area</i> ; 2. <i>Staff Car Parking Area</i>                              |
| Subject: | Response to LB Hillingdon Planning Application refusal<br>(ref: 2668/APP/2016/3948 & 2668/APP/2016/4029) dated 12/04/2017 |

## INTRODUCTION

This Appeal Statement has been prepared in relation to the recent refusal regarding the retrospective planning applications 2668/APP/2016/3948 and 2668/APP/2016/4029 at Land to the northern and southern parts of Cherry Yard, Holloway Farm, Hamondsworth Road, UB7 9JS

The planning application for the proposed development was submitted as part of two separate application's pertaining to two extant areas north and south of the site respectively:

1. Vehicle Maintenance Area – to the NORTH of the site (ref: 2668/APP/2016/3948)
2. Staff Car Parking Area – to the SOUTH of the site (ref: 2668/APP/2016/4029)

Whilst the northern and southern aspects of development have been submitted as part of separate planning applications to the LB Hillingdon, this Appeal Statement has been prepared to address both aspects of the application, in order to assess and outline the cumulative impact and indeed importance of both parts of the site.

## DEVELOPMENT

The retrospective planning application, prepared at the request of the LB Hillingdon, sought to secure permission for the following extant developments, number 1 and 2 for ease of reference:

1. *"Change of use of land from garden centre / nursery to a vehicle maintenance area involving erection of workshop and demolition of glass house and poly tunnels (Retrospective)"* [ref: 2668/APP/2016/3948]
2. *"Temporary Change of use of land from a commercial plant growing area to car parking for staff for 5 years (Retrospective)"* [ref: 2668/APP/2016/4029]

## RECENT PLANNING HISTORY

1. In October 2016, a Planning Application for the respective developments was submitted to the LB Hillingdon, and validated in December 2016.
2. The Planning Application pertaining to the NORTH of the site sought retrospective planning approval on account of the recent change of use, demolition and resurfacing of part of the site to provide a vehicle maintenance building with three associated service tracks. As part of the revised development, the pre-existing access from Holloway Close has been closed and a new access track created adjacent to Harmondsworth Road.
3. The Planning Application pertaining to the SOUTH of the site sought retrospective planning approval for the temporary change of use of land from a commercial plant growing area to car parking for staff (5 years). The car parking area is being used as temporary overspill for parking for CCH Ltd, in relation to the vehicle maintenance depot use for which the site is currently unauthorised. As part of the redevelopment, the pre-existing access from Holloway Close has been closed and a new access track created adjacent to Harmondsworth Road. Specifically in relation to the parking, the application is for a total of 38 CCH staff parking spaces to be located on a removable gravel surface for 5 years, in order to ease conflict with coach vehicle movements from with the adjacent CCH site. It is deemed to be a temporary measure, whilst viable alternatives are sought.
4. As part of the planning application, the applicant commissioned Paul Mew Associates to prepare Transport Statements to assess the transport and highways impacts of the extant development both on the site and wider highway to illustrate that the retrospective development would generate a reduction in vehicle traffic, compared to the site's previous use as part of a commercial premises and plant nursery.

### Vehicle Maintenance Area – North of the site

5. The application for the Vehicle Maintenance Area to the north of the site was recommended for refusal by LB Hillingdon for the following reasons:

*“Non Standard reason for refusal*

- 1. The development represents inappropriate development within the Green Belt and no very special circumstances have been provided or are evident which either singularly or cumulatively overcome the presumption against inappropriate development in the Green Belt.*
- 2. The proposed development, by reason of the siting, overall size, bulk and height of the proposed buildings, the associated infrastructure, and the increase intensity of use would prejudice the openness of the Green Belt, resulting in an unacceptable degree of urbanisation”.*

6. Important to note, the reasons for refusal did not relate to highways matters, with the Highways Officer making the following comments on the application:

*"This application is for a change of use from an existing garden centre / nursey (A1 use) to Sui Generis (vehicle maintenance) at Holloway Farm Harmondsworth West Drayton. Harmondsworth Road is a classified road on the Council's road network. The applicant has submitted a Transport Statement by Paul Mew dated October 2016 in support of the proposed change of use at the site. The site has its main access off Harmondsworth Road but there is a side access / egress on Holloway Close. The green belt site has a PTAL value of 2 (poor) so there will be a strong reliance on private cars for trip making. The existing vehicular access to the site on Harmondsworth Road was previously used by the nursery / plant sales business. The proposed change of use will involve the facility, that has been already built, having coaches parked on site along with vehicles being serviced by mechanics based on the site. The TS estimated that traffic generated by the site as being approximately 400 two-way trips per day which is probably comparable to the A1 use that operated on the site until recently. The site includes a large parking area where buses / coaches are parked on gravelled areas along with an area where vehicles are waiting to be serviced. There are only 3 staff employed directly on the site. The TS also provided information on traffic volumes and travel speeds along Harmondsworth Road to show that the geometry at the access junction accords with appropriate design standards. Given the comparable traffic generation to the previous use and the geometry of the site access I do not have significant highway concerns over the application".*

7. Section 7 of the refusal document outlines the 'Main Planning Issues' associated with the development, with section 7.10 providing an in-depth appraisal of "Traffic impact, Car/cycle parking, pedestrian safety", the full extraction of which is offered herein:

*"Policy AM7 of the Hillingdon Local Plan: Part 2 – Saved UDP Policies (November 2012) considers whether the traffic generated by the proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety. Policy AM14 of the Hillingdon Local Plan: Part 2 – Saved UDP Policies (November 2012) seeks to ensure that all development is in accordance with the Council's adopted Car Parking Standards.*

*The application is supported by a Transport Statement which confirms that this application is for a period of 5 years while the operator, CCH, finds a suitable alternative site for their coach/minibus operation. Currently 44 coaches and mini-buses are stored on site and from as early as 3am drivers arrive to take the coaches out for work and this carries on through the day (up to 11:30pm). Harmondsworth Road is a classified road under the Council's road network. The*

*site has a PTAL value of 2 (poor) so it is likely that many of the workforce will rely on private cars for trip making. There are drivers for each of the coaches/minibuses along with 6 depot staff and there can be as many as 55 staff employed at the site. The TS identified the traffic generation of the site and the use of the car park. There are approximately 122 trips to and from the site each day and the use of the car park was made predominantly by coach/minibus drivers. This activity has been taking place for some time and the impact of the traffic journey during peak periods is likely to be minimal as the spread of the trips is over a long working day. The proposal is to provide car parking by applying a removable gravel surface to the existing agricultural land adjacent to an existing depot. The TS also looked at the suitability of the shared access onto Harmondsworth Road in terms of visibility and show that there was sufficient sight distances. The Highways Officer has advised that given the proximity of the site to Heathrow Airport, no objection is raised on highways grounds subject to a condition restricting the use of the car park for airport related car parking.*

8. In summary, it is clear that on transport, parking and highways grounds, this extant use is not deemed to cause undue issues or reason for objection by both the borough Highways Officer and Case Officer presiding over the application.

#### **Staff Car Parking Area – South of the site**

9. The application was recommended for refusal by LB Hillingdon for the following reasons:

*“Non Standard reason for refusal*

3. *The development represents inappropriate development within the Green Belt and no very special circumstances have been provided or are evident which either singularly or cumulatively overcome the presumption against inappropriate development in the Green Belt.*

10. Important to note, the reasons for refusal did not relate to highways matters, with the Highways Officer making the following comments on the application:

*“The retrospective application is to change the use of a parcel of land at the Cherry Yard site in Harmondsworth Road West Drayton to staff car parking (38 spaces). The applicant has supplied a Transport Statement by Paul Mew dated October 2016 in support of the application. This application is for a period of 5 years while the operator, CCH, finds a suitable alternative site from their coach/minibus operation. Currently 44 coaches and mini-buses are stored on site and from as early as 3am drivers arrive to take the coaches out for work and this carries on through the day. The coaches/minibuses return throughout the day and return by the end of the day (up to 11:30pm). Harmondsworth Road is a classified road under the Council's road network. The site has a PTAL value of*

2 (poor) so it is likely that many of the workforce will rely on private cars for trip making. There are drivers for each of the coaches/minibuses along with 6 depot staff and there can be as many as 55 staff employed at the site. The TS identified the traffic generation of the site and the use of the car park. There are approximately 122 trips to and from the site each day and the use of the car park was predominantly made by coach/minibus drivers. This activity has been taking place for some time and the impact of the traffic during peak periods is likely to be minimal as the spread of trips is over a long working day. The proposal is to provide car parking by applying a removable gravel surface to the existing agricultural land adjacent to the existing depot. The TS also looked at the suitability of the shared access onto Harmondsworth Road in terms of visibility and shows that there was sufficient sight distances. Given the proximity of the site to Heathrow Airport I suggest a condition restricting the use of the car park for airport related car parking is added to any approval. On the basis of the above comments I have no significant objections to the application".

11. Section 7 of the refusal document outlines the 'Main Planning Issues' associated with the development, with section 7.10 providing an in-depth appraisal of "Traffic impact, Car/cycle parking, pedestrian safety", the full extraction of which is offered herein:

*"Policy AM7 of the Hillingdon Local Plan: Part 2 – Saved UDP Policies (November 2012) considers whether the traffic generated by the proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows and conditions of general highway or pedestrian safety. Policy AM14 of the Hillingdon Local Plan: Part 2 – Saved UDP Policies (November 2012) seeks to ensure that all development is in accordance with the Council's adopted Car Parking Standards.*

*The application is supported by a Transport Statement which confirms that this application is for a period of 5 years while the operator, CCH, finds a suitable alternative site for their coach/minibus operation. Currently 44 coaches and mini-buses are stored on site and from as early as 3am drivers arrive to take the coaches out for work and this carries on through the day. The coaches/minibuses return throughout the day and return by the end of the day (up to 11:30pm). Harmondsworth Road is a classified road under the Council's road network. The site has a PTAL value of 2 (poor) so it is likely that many of the workforce will rely on private cars for trip making. There are drivers for each of the coaches/minibuses along with 6 depot staff and there can be as many as 55 staff employed at the site. The TS identified the traffic generation of the site and the use of the car park. There are approximately 122 trips to and from the site each day and the use of the car park was made predominantly by coach/minibus drivers. This activity has been minimal as the spread of trips is over a long working day. The proposal is to provide car parking by applying a removable gravel surface to the existing agricultural land adjacent to the existing*

*depot. The TS also looked at the suitability of the shared access onto Harmondsworth Road in terms of visibility and show that there was sufficient sight distances. The Highways Officer has advised that given the proximity of the site to Heathrow Airport, no objection is raised on highway grounds subject to a condition restricting the use of the car park for airport related car parking”.*

12. In summary, it is clear that on transport, parking and highways grounds, this extant use is not deemed to cause undue issues or reason for objection by both the borough Highways Officer and Case Officer presiding over the application.

## **LB HILLINGDON HIGHWAYS / TRANSPORTATION RESPONSE**

13. Whilst no issues are outlined with regards to highways, the combined reasons for refusal cite inappropriate development in the green belt and a considered intensity of use as contributing factors for objection.
14. In response to the refusal, the applicant has commissioned Paul Mew Associates to prepare a Highways Appeal Statement in relation to the recently refused scheme, to further illustrate the acceptability of the proposed development. For ease of reference, this has been broken down into several relevant aspects of transport surrounding the site.

### **Site Accessibility**

15. The site benefits from excellent connectivity to major roads, being in close proximity to the A3044 Holloway Lane and the M4 motorway, the latter of which forms a major road between London and South Wales, linking major towns and cities including Slough, Reading, Swindon, Bristol and Cardiff.
16. Regular London Bus Services are also accessible from Harmondsworth Road north of the site, with routes U3 and 350 providing regular connections to destinations including Heathrow Airport, Uxbridge and West Drayton. West Drayton railway station, directly accessible by bus provides four trains per hour to London Paddington, and two trains per hour to both Reading and Oxford respectively.
17. The extant development lends itself well to cycling through both the provision of appropriate facilities, and a cycle to work scheme which is being operated at the site.
18. The range of public and sustainable transport options available will further reduce the trip-generation of a site.

## Policy Compliance

19. The refusal outlines the relevant policies with which the traffic impact, car/cycle and pedestrian safety are considered in terms of this application. In considering the subsequent assessment through the production of Transport Statement, the report concludes that given the proximity of the site to Heathrow Airport, no objection is raised on highway grounds subject to a condition restricting the use of the car park for airport related car parking. The scheme is thus compliant on transport grounds.

## Trip-Generation Projections

20. The Transport Statement illustrated that the extant development for which retrospective approval has been sought, would be expected to result in a benefit to highway capacity, safety and neighbouring amenity when compared with the former use as a commercial plant nursery.
21. The Highways Officer supported this as outlined above, with the following comments made regarding the Vehicle Maintenance Area:

*“Comparable traffic generation to the previous use and the geometry of the site access I do not have significant highway concerns over the application”.*

22. Further comments made by the Case Officer recognized that *“this activity has been taking place for some time and the impact of the traffic during peak periods is likely to be minimal as the spread of trips is over a long working day”.*

23. Reasons for refusal which contended an ‘increased intensity of use’ from the sites former use as a plant nursery would be at odds with the trip-generation analysis which illustrated a beneficial change for the site, and drew support from both the respective LB Hillingdon Highways and Case Officer’s in relation to the application.

24. Support was similarly prevalent from the Council with regards to the Staff Car Parking Area, with the Highways Officer making the following comment:

*“Activity has been taking place for some time and the impact of the traffic during peak periods is likely to be minimal as the spread of trips is over a long working day”.*

25. The Case Officer made further comments in confirmation of the above, noting that *“The TS also looked at the suitability of shared access onto Harmondsworth Road in terms of visibility and show that there was sufficient site distances”.*

26. Looking cumulatively at both planning applications for the site as a whole, alongside the supportive observations for the staff car park, any notions contending an ‘increased

intensity of use' in relation to the vehicle maintenance area from the sites former use as a plant nursery would be at odds with the trip-generation analysis which illustrated a beneficial change for the site, and drew support from both the respective LB Hillingdon Highways and Case Officer's in relation to the application.

#### **Site Access & Access Road**

27. Following speed surveys undertaken at the site, a sightline and visibility assessment was undertaken in accordance with recommended DMRB and Manual for Streets guidance and procedure.
28. The assessment undertaken illustrates that the positioning of the extant site access accommodates sufficient sightlines in both the leading and trailing directions within highway land or land within the applicant's ownership.
29. The site access as shown satisfies the sightline requirements set out in Manual for Streets in accordance with the measured design speed of the road.
30. The access itself benefits from excellent visibility in both directions. The significant reduction in vehicle trips as a result of the change in use from a garden centre / plant nursery to a vehicle maintenance area should be taken into account when considering the site access. Less trips on the site access mean less traffic, less crossing of the cycle lane and indeed less crossing of the carriageway when vehicles are required to perform a right turn when accessing the site from the south. The lesser trips therefore bring not only reduced pressure on the site access, but lessen congestion and traffic for both southbound and northbound flow on Harmondsworth Road.
31. In turn, a less intensive use of the site access reduces propensity for highway accidents around both the access and the adjoining road. This is a clear safety advantage to the site when considering the extant operation in this location.

#### **Highway & Junction Safety**

32. The suitability of the site access was measured taking into account the wet weather adjustment in vehicle speeds in accordance with DMRB guidelines. The site lines were clearly achievable.
33. An accident assessment was also conducted through a comprehensive analysis of Transport for London statistics. No accidents were attributed to the site access within the last 5 years.

## Development Nature & Green Belt

34. The refusal outlines that the extant development as a vehicle maintenance area and associated staff car parking area would be unlikely to generate traffic in excess of the former AI use, also noting that the extant activity has not only been taking place for some time, but the impact is seen to be minimal given the spread across a 'long working day' as opposed to concentrated or heightened periods of intensive use.
35. Garden Centres and Plant Nursery's, regularly operate over a 7-day period, have high seasonal influxes in deliveries and customers, and generate the need for additional capacity across weekends, particularly Sundays and bank holidays. On busy weekend, bank holiday and seasonal periods in particular, a garden centre / commercial nursery would generate hundreds of trips during the daytime. The existing site use as a vehicle maintenance area does not generate this level of demand, whilst the nature of the development does not have the propensity for seasonal or weekend peaks, which would have been more likely as the former plant nursery.
36. In terms of location, trip intensity, travelling and carbon usage, the site is well suited to a business linked with London Heathrow Airport. The close proximity to the airport reduces the necessity for long vehicle trips for both commercial vehicles associated with the business, and other servicing vehicles. Re-locating the site further away from the airport would naturally increase travelling time and efficiency from an economic perspective, but also increase vehicle time on the road, and contribute to congestion in other areas.
37. Minimising journey time to and from the site is a key advantage of the extant site, both economically and environmentally, which is fundamentally in-keeping with Heathrow Airport's 2014-2019 Sustainable Transport Plan, as outlined in the following section.

## London Heathrow Airport – Sustainable Transport Plan 2014-2019

38. Heathrow Airport have produced a Sustainable Transport Plan (STP) covering the period 2014 to 2019, in accordance with the Aviation Policy Framework advice published by the Department for Transport in 2013, which seeks to focus on sustainable travel and airport surface access strategies.
39. The key priorities of the Heathrow Sustainable Transport Plan are to:
- Increase the use of sustainable travel modes to and from the airport;
  - Reduce transport emissions; and
  - Ensure Heathrow continues to flourish as a multi-modal interchange for airport passengers, staff, freight and neighbouring communities.

40. Within the strategic framework of the STP, the 'Heathrow Vision' requires the airport to be *"properly integrated into an efficient, reliable, sustainable and convenient surface access network"*; with the report progressing to outline the respective benefits for passengers, the airport, and for society respectively.
41. For 'Society', the aim is to create a unique and sustainable surface access network which improves Heathrow's link with the wider community, under the following 3 main aims:
- Better Connectivity – *to support economic growth, job creation, quality of life*
  - Lower Emissions – *to protect the environment and improve air quality*
  - Less Congestion – *to support mobility around Heathrow, London and the UK by promoting greater use of public transport and helping to reduce our contribution to traffic and congestion*
42. The STP recognizes the airport activity in the context of national, regional and local transport policies, with a fundamental need to manage and reduce the environmental impacts of airport operations outlined in both the London Plan and Hillingdon Local Plan, at regional and local levels respectively. Looking at the overarching national policy, the following extraction from the Aviation Policy Framework is considered relevant for this Appeal:
- "High quality, efficient and reliable road and rail access to airports contributes greatly to the experience of passengers, freight operators and people working at the airport. Greater use of low carbon modes to access airports also has the potential to reduce CO<sub>2</sub> emissions, as well as leading to less congestion and improved air quality"*
43. There is clearly an emphasis on reducing emissions and improving air quality whilst simultaneously reducing congestion. The CCH Logistics Vehicle Maintenance Depot is a business directly related to the airport and its transport network. The overall business model in itself is intrinsically linked to reduction in congestion and provision of sustainable transport, given the company vehicles are used to provide coach and minibus travel to and from the airport.
44. The current location of the business along Harmondsworth Road, is immediately north of and provides short and direct road routes to Heathrow Airport. This not only makes economic sense, but also increase efficiency, lowers fleet vehicle emissions, improves associated air quality and limits contribution to congestion.
45. Heathrow recognizes the increasing demands and opportunities for the airport, which continues to expand, and the impact of this upon fleet and freight logistics and operations, with the challenges regarding 'Traffic Congestion' as outlined herein:

*“The sections of the M25 and M4 near Heathrow during the peaks already operate near capacity, with periods of congestion extending beyond the traditional peak hours. Bottlenecks on the airport and wider local road network also cause delays to passengers, staff and other road users. The government is projecting continued traffic growth on the network, which means that road conditions will get worse and journeys will be less reliable”*

46. With this in mind, the location of the current site south of the M4 at Holloway Farm is crucial to avoiding and indeed contributing on a daily basis to an already pressured wider road network. If the business were forced to be relocated, its role in exacerbating existing congestion issues surrounding the London Orbital Motorway junction with the M4 west of the site, and the M4 Junction 4 to the east of the site, would need to be strongly considered.

## CONCLUSION

47. This Highways Appeal Statement has reviewed the highways and transportation impact of the extant development in light of the recent refusal for retrospective planning approval.
48. Whilst it is clear that the development has not been refused on the basis of highway / transport grounds, it is pertinent to illustrate the suitability of the development at the site.
49. It is considered that the extant location of the business, reduces emissions, reduces journey times, reduces congestion and enables efficiency, all of which are in-keeping with the key drives of the Heathrow STP.
50. It is not considered that the existing site, which has been operational for over a year, is of detriment to the Green Belt, and will result in a less intensified use of the site access or site-related traffic. As the Highways Officer associated with the application acknowledged, the development is considered satisfactory and will not result in conditions prejudicial to highway capacity, safety or neighbouring amenity.
51. On the basis of the highways comparison between the existing and former site, we would recommend contentions of any *“increased intensity of use”* as noted in ‘Non-standard Reason for Refusal 2’ and the benefits of the development be reconsidered.
52. The current location and operation of the site, whilst increasing efficiency and providing sustainable transport, is intrinsically linked to a reduction in congestion, lowering of emissions and subsequent improvement in air quality. Strong consideration would therefore the conversely negative effects associated with any forced relocation of the site.