



ttp consulting
transport planning specialists

Land adjacent to 68 and 70 Violet Avenue

Appeal Statement

October 2018

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Job No: 2018-3262
File Ref: N01-PS-Appeal Statement
Date: 04/10/2018
Job Title: Land adjacent to 68 and 70 Violet Avenue

Subject: Transport Appeal Statement

Introduction

- 1.1 TTP Consulting has been appointed by Mr Durim Tusha to provide traffic and transport advice in relation to the proposed development of land adjacent to 68 and 70 Violet Avenue, located in the London Borough of Hillingdon (LBH). The development proposals seek to provide three residential units with no on site car parking.
- 1.2 The development proposals were the subject of a planning application (reference 73222/APP/2018/1022), which was refused by LBH in September 2018 for four reasons, the second of which was transport related, as detailed below.
- "The proposal has not demonstrated that sufficient off street parking/manoeuvring arrangements would be provided, and therefore the development is considered to result in substandard car parking provision, leading to on-street parking/queuing to the detriment of public and highway safety and contrary to policy AM14 of the Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012), to Hillingdon's Adopted Parking Standards as set out in the Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012) and the adopted Supplementary Planning Document HDAS:Residential Layouts."*
- 1.3 This technical note considers the transport reason for refusal and provides evidence that the demand for car parking can be accommodated on street without breaching the 85% parking occupancy level threshold above which the Council considers that further development that adds to on street parking demand is unacceptable.

Estimated Parking Demand

- 1.4 The demand for on street parking associated with future residents of the proposed development has been calculated based upon car ownership data for the Yiewsley ward, where the site is located, recorded by the 2011 census. This assessment, which was presented in the March 2018 Transport Statement that accompanied the planning submission, also considered car ownership data from the 2001 Census. This data illustrates that:

- In 2001 car ownership amongst Yiewsley residents that live in flats, maisonettes or apartments was 0.78 cars per household
- In 2011 car ownership amongst Yiewsley residents that live in flats, maisonettes or apartments was 0.71 cars per household.

1.5 The Census therefore indicates that car ownership amongst people living in flats, apartments or maisonettes has fallen between the 2001 and 2011 census. The Transport Statement that accompanied the planning application related to the original proposal, which sought to provide four apartments on the site. Based on the 2011 Census, the Transport Statement estimated that the development would result in a parking demand three cars.

1.6 Prior to determination of the planning application, the proposed scheme was revised to reduce the proposed number of units to three, in response to concerns raised by officers. The Highway Officers comments on the original scheme, which are contained on page 30 of the Councils Committee Report advised that;

"When considering the quantum of development against the Council's Parking Standards, it is required that 3(no) parking spaces are provided to serve the proposed units. These spaces are to be accommodated for along the highway network."

1.7 Officers feedback to the original proposals indicates that it was accepted that the demand for parking associated with the four unit scheme would be three cars. However, the Revised Highway Comments relating to the three unit scheme as presented on pages 30 and 31 of the Councils Committee Report advise that;

"Whilst the submitted TS suggests that 3 spaces would be sufficient in accommodating the development, it is noted that this was based on census data which has been derived from information pertaining to car ownership levels from 2001 and 2011 only. The data is out of date insofar as it was collected some 7 years ago so only limited weight can be afforded to conclusions made at this time. Since then, car ownership levels have increased and further development pressures locally mean that additional spaces are required."

1.8 The above Committee Report does not include any evidence to substantiate the claim that car ownership levels have increased and it is noted that the report "Hillingdon Parking Standards Justification", which was added to the evidence library for the examination in public of Hillingdon's Local Plan Part 2 in July of this year, makes use of 2011 car ownership Census Data.

- 1.9 As noted above, Census data indicates that car ownership has fallen between the years 2001 and 2011 and in the absence of any newer data, it is considered that the 2011 census is the most reliable source on which to base this assessment on. On the basis of 2011 Census data, the revised three unit scheme is likely to result in demand for parking on site increasing by two cars.

Effect of Additional On Street Parking Demand

- 1.10 Page 30 of the Planning Committee Report, in relation to the four unit development scheme, goes on to advise that;

"As part of the submissions, a Lambeth Methodology Parking Survey was undertaken which demonstrates current on-street parking at an 82% occupancy level. Upon implementation of the proposed works, this percentage will increase up to 84%. It should be noted that this survey was carried out at times of peak residential parking demand and within a 200 metre walking distance of the site.

In addition to the 3(no) parking spaces required by the proposed development, parking currently associated with no. 68 & upon the development site will be displaced onto the network. It is therefore considered that the predicted parking occupancy level will exceed the 85% occupancy level threshold.

The proposals will likely result in 5(no) displaced parking spaces which is detrimental to the operation of the highway network and is contrary to policies AM7 and AM14 of the Hillingdon Local Plan: Part two - Saved UDP Policies (November 2012)."

- 1.11 It is clear from these comments that Officers considered that an additional three car parking on street, associated with residents of the four units originally proposed, would not result in demand for on street parking exceeding the Council's 85% occupancy threshold. Given the revised proposals for the three unit scheme, the 2011 Census indicates that demand for parking by future residents would likely reduce to two additional cars.

- 1.12 The reduction in the number of dwellings proposed from four to three was considered in a letter produced by TTP Consulting dated 20 June 2018. This letter considered the effect of a further four cars parking on street, two associated with the development and two associated with 68 and 70 Violet Avenue. This assessment concluded that parking on street would increase to a maximum of 84.8% in this scenario (Scenario 1), which is below the Council's 85% threshold.

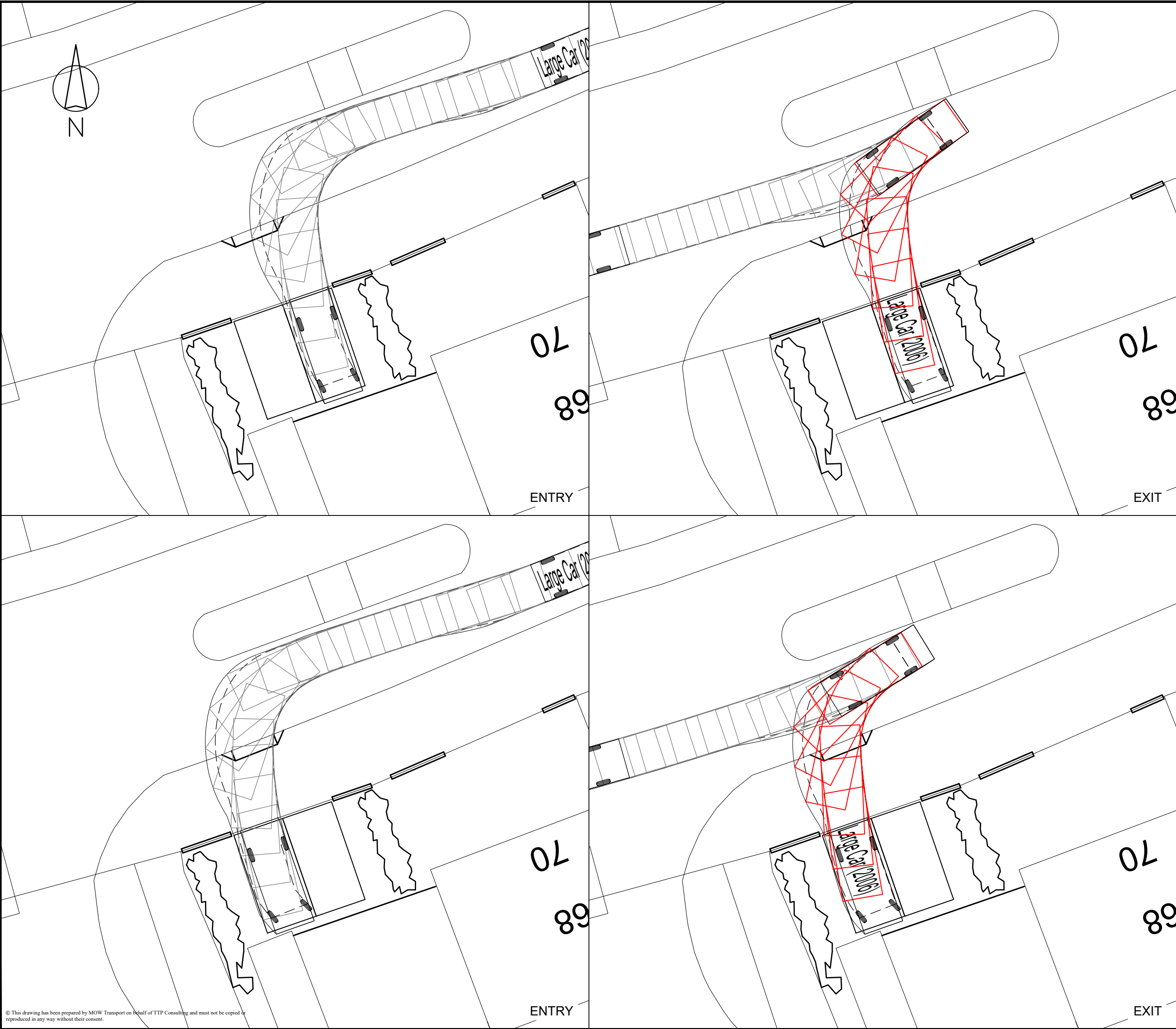
- 1.13 The Transport Statement contained swept path analysis (which is attached at **Appendix A** for convenience) to demonstrate that the site could only accommodate parking for one vehicle as the crossover is not wide enough to enable two cars to park on site without mounting the kerb to cross the footway. It is also worth noting that no. 68 is a separate land title to that of no. 70 and hence parking demand associated with no. 68 should not be considered. As such, the effect of two cars parking on-street associated with the proposed development, along with one associated with the existing site would increase on-street parking to a maximum of 84.1% (Scenario 2).
- 1.14 It is the Council's view that the development site currently serves as parking for the adjacent residential units at 68 & 70 Violet Avenue. However, the applicant maintains that occupants of these properties have not right to park on the site. As such, future on-street parking demand could increase to 83.3% (Scenario 3), which is below the Council's 85% threshold.

Summary and Conclusion

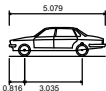
- 1.15 TTP Consulting has been appointed to provide traffic and transportation advice associated with the proposed development of land adjacent to 68 and 70 Violet Avenue, in the London Borough of Hillingdon.
- 1.16 In summary, it is considered that the development proposals would not result in demand for on street parking exceeding the 85% parking occupancy level above which the Council considers that further development that adds to on street parking demand is unacceptable.
- 1.17 It is therefore considered that there is no highway or transport reason that the development proposals should not be granted planning approval.

Appendix A

(Swept Path Analysis)



Rev	Details	Drawn	Checked	Date
1				



Large Car (2006) 06 Mercedes S-Class

Overall Length	5.079m
Overall Width	1.872m
Overall Body Height	1.525m
Min Body Ground Clearance	0.310m
Max Track Width	1.831m
Lock to Lock Time	4.00s
Kerb to Kerb Turning Radius	5.900m

Notes:
1. This is not a construction drawing and is intended for illustrative purposes only.

Client
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Project
Violet Avenue

Drawing Title
Swept Path Analysis using a Large Car

Scale
1:250 at A3

Drawn	MW	21.02.18
Checked	EC	21.02.18



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