
Technical Note

Project No: ITL14154
Project Title: Nestles Avenue, Hayes
Title: Supplemental Statement
Ref: ITL14154-013d
Date: 12 December 2019

SECTION 1 INTRODUCTION

1.1 Context

1.1.1 Healey Development Solutions (Hayes) Ltd has lodged a planning appeal to the Planning Inspectorate (PINS) in respect of planning application reference 51175/APP/2018/4260 relating to the redevelopment of 9 Nestles Avenue for:

Demolition of existing building and redevelopment to provide a building up to 10 storeys, with 868 sqm. of commercial or community space (Use Class B1 or D1) at ground floor level and 81 (44 x 1-bed, 28 x 2-bed and 9 x 3-bed) residential units to the upper floors, with associated landscaping, access, car parking and cycle parking.

1.1.2 i-Transport LLP provided transport and highway advice to support the planning application including preparation of the Transport Assessment (TA), Framework Travel Plan (FTP) and Delivery and Servicing Plan (DSP).

1.1.3 The local planning authority, the London Borough of Hillingdon (LBH), have provided their Highways Statement of Case (SoC) which we have reviewed, alongside the Statement of Common Ground (SoCG) also prepared between the appellant and LBH.

1.1.4 This note reviews the evidence and provides a supplemental statement. This note is intended to form part of an additional submission in light of PINS identifying this appeal be heard by way of Inquiry rather than as a Hearing event. Any Proof of Evidence that follows in respect of an Inquiry will be prepared on the principles set out within this statement.

1.1.5 This note considers the two remaining highway reasons for refusal in turn, Refusal 6 – Car Parking and Reason 7 – Loading Bay. Reason 8 – Manoeuvring is no longer being pursued by LBH.

SECTION 2 REVIEW

2.1 Reason 6 – Car Parking

- 2.1.1 The LBH SoC notes at Paragraph 2.2 that maximum car parking standards would require a total of 122 on-plot parking spaces, plus 11 spaces for the commercial unit. Paragraph 2.3 further states that the provision of four blue badge spaces, three for the residential use and one for the commercial use, falls short of the Council's policy standards. The evidence goes on to state;

"For this development to be in accordance with approved developments in the nearby surrounding area it would require a parking ratio of 0.6 spaces per unit. This lower ratio of parking requires a total of 49 spaces for the residential component as well as a further 11 spaces for the commercial aspect of the scheme (totalling 60 on-plot spaces). This is considered to be an acceptable level of parking." (Para 2.4).

- 2.1.2 The SoC continues at Paragraph 2.5;

"It should be noted that a recent planning application on Viveash Close was refused planning permission and was dismissed on appeal (appeal reference: APP/R5510/W/18/3218824) on the 19th July 2019. The appellant in this appeal sought a parking ratio of 0.5 spaces per unit which the Highway Authority considered to be below that which would normally be acceptable. The Planning Inspectorate in his appeal decision, specifically section 18 (page 4), found that Viveash Close is not covered by any parking restrictions and is heavily parked upon. The inspectorate further states in section 19 (page 5) that the very small difference between the councils preferred ratio of 0.6 spaces and the provision of 0.5 spaces per unit was marginal."

- 2.1.3 Firstly, in respect of parking it should be noted that LBH standards are maximum standards. The SoC refers to the saved Unitary Development Plan policies (November 2012) which are proposed to be replaced by Part 2 of LBH Local Plan, intended for adoption in December 2019/January 2020. The examination of this part of the Local Plan has had regard to the 2016 London Plan, i.e. the adopted version at the time of examination (itself intended to be replaced by the current Draft London Plan which has completed its examination and is due for adoption also in early 2020).

- 2.1.4 To ensure the policy relating to vehicle parking is effective within the LBH Local Plan Part 2, the Planning Inspector appointed to examine the document has recommended that;

"... it is necessary to amend the explanatory text of policy DMT 6 Vehicle Parking to establish that the standards contained within Appendix C Table 1, are maximum levels and do not imply any minimum level" (Except of Paragraph 59 of Inspectorate Report (File Ref PINS/R5510/429/8)).

- 2.1.5 This further stresses that the maximum number of parking provision set by policy is just that; there is no minimum number of parking spaces required for development and the Inspector's comment is

aligned to the thrust of regional Policy which is to drive down parking provision and increase car-free development in locations which can sustain it. Indeed, Paragraph 2.4 of the SoC has acknowledged that lower than the maximum standard has been accepted locally, at a ratio of 0.6 spaces per dwelling.

- 2.1.6 The proposed development would provide four off-street disabled parking spaces only (three spaces for the residential use and one space for the commercial use). All spaces would be enabled with electric vehicle charging points from the outset, which complies with Policy.
- 2.1.7 Section 4 of the TA (submitted as part of application 51175/APP/2018/4260) confirmed that the proposed parking provision is compliant with the parking standards of the adopted Hillingdon Local Plan insofar as the number of spaces does not exceed the maximum standard. The proposed parking provision is also compliant with both the London Plan and emerging London Plan (July 2019).
- 2.1.8 Table 2.1 provides a summary of relevant car parking policy together with maximum number of parking spaces permitted for the proposal by each policy. This table demonstrates that the proposed number of spaces is below the maximum number of spaces allowed. There is no minimum parking standard requirement set out by LBH standards; the parking provision proposed fully aligns with the thrust of both National and Regional Policy which is to drive down parking provision and increase car-free development in locations which can sustain it. This site has a PTAL of 4, rising to 5 (very good) once Crossrail is completed and is within 400m of Hayes and Harlington station which offers high frequency rail services to a range of destinations, therefore the proposed level of parking is considered appropriate and acceptable. Indeed, if car-free development cannot be accommodated in a location such as this, it is questioned where it can be.

Table 2.1: Summary of Maximum Parking Standards

Policy Document	Parking Standard (Maximums)	Maximum Provision Allowed (based on Development Proposal)	Provision Proposed	Meets Standard?
Hillingdon UDP (Saved November 2012)	Residential – Up to 1.5 spaces per dwelling	122 Spaces	3 Spaces	✓
	B1 (unrestricted) – 1 space per 100sqm	8 Spaces	1 Space	✓
	D1 – On an individual basis	n/a	1 Space	✓
London Plan (March 2016)	Residential – Up to 1 space per unit	84 Spaces	3 Spaces	✓
	B1 (unrestricted) – 1 space per 100sqm – 600sqm	1 – 8 Spaces	1 Space	✓
	D1 – In PTAL 4-6, limited to operational needs/provision for disabled people	At least 1 disabled space	1 Space	✓
Emerging Hillingdon Local Plan Part 2 – Development Management Policies ¹	Residential – 1 – 2 Beds – 1 – 1.5 spaces per unit 3 Beds – 2 spaces per unit	126 Spaces	3 Spaces	✓
	B1 – 1 space per 50 – 100sqm	10 – 19 spaces	1 Space	✓
	D1 – On an individual basis	n/a	1 Space	✓
Emerging London Plan (July 2019) ²	Residential - All areas of PTAL 5 – 6 – Car Free with the exception of disabled persons parking	0 General Spaces plus disabled parking (up to one space per 10% of units)	3 Spaces	✓
	B1 - Up to 1 space per 600sqm	1 Space	1 Space	✓
	D1 – In PTAL 4-6, limited to operational needs/provision for disabled people	At least 1 disabled space	1 Space	✓

Source – Policy Documents

¹ Due for adoption prior to new London Plan December 2019 / Jan 2020

² New London Plan completed examination with no recommendation to change parking standards – Feb/March timetable for adoption as shown on Mayoral website

- 2.1.9 In addition, within the same paragraph 19 of the appeal decision as referenced within the SoC, the inspector of that appeal has also acknowledged that that site is “*within an accessible location and has a good PTAL score of 4, which would rise to 5 if the Crossrail project is completed... The site is very close to the railway station and other facilities which means that residents would have good access to services and alternatives to using the private car would be encouraged and would be available.*”
- 2.1.10 Policy generally is towards reducing traffic and not encouraging it, thus in the context of residential development, restrictive parking and car-free development in the most accessible locations is supported within current Policy. The PTAL of the site is currently 4 (good) and will rise to 5 (very good) once Crossrail is introduced. The site is less than 400m from Hayes and Harlington station and there are real alternatives to private car use available. The site is within one of the most accessible parts of the Borough and the level of service of public transport will only improve over time, with the completion of Crossrail, so the site will become more accessible than it already is today. Transport for London (TfL), who respond on transport elements of a proposal when a scheme is referable to the Mayor of London/Greater London Authority, are wholly supportive of car-free development in this location. TfL state in their consultation response to this application that the proposed car-free nature of the development is ‘**both welcomed and strongly supported**’. Thus, TfL see that the sustainable nature of the location of this site is capable of supporting car-free development and recognise that sites such as this are required to achieve the all-important shift towards more sustainable and more environmentally friendly residential development.
- 2.1.11 The approach to restraint-based car parking in these locations is further acknowledged in the TfL response to the March 2019 consultation on the proposed Main Modifications to LBH Local Plan Part 2 (dated 2nd May 2019 and attached at Appendix A). Within their response, they acknowledge;
- “High parking standards are especially concerning in [Uxbridge and Hayes] and the other PTAL 4 -6 locations that are best served by public transport and are generally in close proximity to local services and facilities... It is the poorer families in our city who are disproportionately impacted by the congestion and emissions resulting from high levels of parking - with their bus journeys slowed, air pollution increased, and severance worsened. Congestion, emissions and public health are challenges facing our city that span administrative boundaries and all boroughs must make an appropriate contribution to addressing them. This approach is increasingly being recognised by other outer London boroughs, including the London Borough of Merton which has recently published a draft Local Plan that follows the approach set out for parking in the draft London Plan. Other boroughs such as Hounslow, Bexley and Croydon also take a more mixed approach to parking, recognising that well connected parts of outer London can have successful car free and car-lite development.”**
- 2.1.12 The new London Plan is planned to be adopted in Feb/Mar 2020 with no changes required to car parking standards following the issue of the inspectorate report in October 2019. These require car-free developments in the location of the application site, as set out in Table 10.3 of the new London

Plan. As noted at paragraph 565 of the Inspectorate report; ***“The standards seek to restrict the provision of general parking compared to the past and take account of the scale and type of development, car ownership levels and use, accessibility by non-car means, and the needs of disabled people. In this context, and for the specific reasons set out below, we are satisfied that there is clear and compelling evidence to justify the approach to car parking set out in the Plan” (Para 565, Examination Report of London Plan 2019).***

2.1.13 With regards to the local appeal decision at Viveash Close, whilst it is correct to state Viveash Close is not subject to parking controls, it does form part of the adopted highway network. Accordingly, enforceable parking controls could be introduced; indeed, the SoCG outlines S106 Heads of Terms which include funds to possibly extend the CPZ. An extension of the CPZ here will overcome any perceived issue that LBH has in respect of overspill parking.

2.1.14 In addition, the Draft LP intended to be adopted in early 2020 includes at Policy T6 BA;

“An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.”

2.1.15 The document continues with supporting text at 10.6.1;

“... a fixed road network cannot absorb the additional cars that would result from a continuation of current levels of car ownership and use. Implementing the parking standards in this Plan is therefore an essential measure to support the delivery of new housing across the city. In some areas, it will be necessary for boroughs to introduce additional parking controls to ensure new development is sustainable and existing residents can continue to park safely and efficiently.

2.1.16 At paragraph 2.8, the SoC acknowledges the PTAL of the site will increase to a PTAL 5 but goes on to state that this does not reflect the deficiencies in connectivity of the public transport network to destinations beyond Greater London. However, this is contrary to the Inspector’s conclusion of the Viveash Close appeal, which concluded that site is in fact located such that ***“residents would have good access to services and alternatives to using the private car... would be available.”***

2.1.17 Paragraph 2.9 of LBH SoC goes on to state;

“Given that the Respondent is an Outer London Borough any future occupiers of the development are likely to travel to destinations beyond Greater London such as Reading, Slough, Staines, High Wycombe, St Albans etc. Few of the public transport services available in Hayes Town Centre serve these destinations therefore the new residents are likely to be reliant on the private car to satisfy their daily travel needs.”

- 2.1.18 There is no justification or evidence to support this. A detailed review of the Census database confirms that by far the majority of existing residents (85.4%) who live in the same area as the application site, (Middle Super Output Area Hillingdon 030) are also employed within a London Borough, i.e. not outside of Greater London. Almost half of these residents (41%) are actually employed within the borough of Hillingdon, with circa 30% of all employees employed within the MSOA that covers Heathrow Airport, which is connected directly by bus and rail to/from the appeal site whilst the next main destination for circa 15% of local residents is to have a place of work within Hayes Town Centre, within walking distance or very short bus journey. Thus; the notion that future residents are likely to travel to destinations west of the site that are not well served by public transport is not justified.
- 2.1.19 In addition, the Reading and Slough destinations are already connected to the site by National Rail services from Hayes and Harlington station. Thus; if these are key destinations for leisure travel (or non-employment travel as the census only provides for journeys to work) they are still accessible directly by public transport from Hayes and Harlington station which is within 400m of the site and there are clear alternatives to travelling to these destinations by private car for all journey purposes.
- 2.1.20 Paragraph 2.10 of the LBH SoC suggests that this assumption can be confirmed by way of existing car ownership levels within the borough of Hillingdon as a whole, which are the highest in London, and therefore the site should provide a level of car parking.
- 2.1.21 However, this simply does not correlate. The borough covers a broad area with varied PTALs, the majority of which are low. This site is located within one of the best-connected and most accessible areas of the borough and therefore considering car ownership on a borough level is not appropriate.
- 2.1.22 Following this, the SoC acknowledges that a controlled parking zone is in place Monday – Saturday to restrict car parking. However;
- “whilst the surrounding road network makes use of some parking deterrents, the associated impacts along the unrestricted roads within the vicinity of the site have not been factored, particularly along both Harold Avenue and Viveash Close.” (Para 2.13)***
- 2.1.23 Notwithstanding the point above at 2.1.13, Harold Avenue is also not subject to controls and does form part of the public highway. Harold Avenue is 180m walk from the site which could be argued as unattractive in terms of distance. When doing a Lambeth methodology parking survey, the maximum walk distance expected for people to park from their residence is 200m.
- 2.1.24 Regardless, the key point in respect of on-street parking, as per para 2.1.13, is that the SoCG outlines S106 Heads of Terms which include funds to possibly extend the CPZ. Any extension would surely include Harold Avenue and Viveash Close. This combined with restrictions preventing future residents

from being able to obtain a permit, standard practice for new developments across London, would serve to reduce the likelihood of any parking issues arising.

- 2.1.25 If future residents cannot obtain a permit (a process controlled by LBH) and the area has enforceable parking controls (enforced by LBH), the only point that remains in respect of Reason for Refusal 6 is that LBH view the proposed car parking provision as not meeting their Policy. However, Table 2.1 confirms that the proposed level of parking is within the maximum standards set out within all relevant Policy of both LBH and TfL.
- 2.1.26 The issue of car parking is one of balance and for a referable application within an outer London borough such as Hillingdon this must be considered in the context of both TfL and LBH Policy, as well as in the wider context of NPPF.
- 2.1.27 When considering NPPF and the three tests outlined at paragraph 108, the relevant test in respect of this reason for refusal is whether car-free development in this location would result in **a severe impact**. Given a CPZ currently exists (controlled by LBH) and that the S106 Heads of Terms outline funds to be secured to possibly extend this CPZ to roads that are currently excluded (controlled by LBH) and a further restriction on future residents being prevented from obtaining parking permits (also controlled by LBH), it can only be concluded that no severe impact would arise from this development.
- 2.1.28 In fact, the proposed development is supportive of the move in Policy towards car-free and car-light development and when considered in the context of the remaining two tests of NPPF, the development does use all appropriate opportunities to promote sustainable transport modes and provides safe and suitable access for all users.

Car Club

- 2.1.29 In terms of maximising opportunities to promote sustainable travel, car clubs provide the opportunity for residents to have access to a car without owning a private vehicle. As this transport option has become established in London, surveys have consistently demonstrated the positive benefits of car clubs – including the fact that car club members drive significantly fewer miles than other London drivers and have lower car ownership than Londoners in general.
- 2.1.30 Indeed, the Carplus Annual Survey of Car Clubs 2016/17, extract provided at Appendix B, found that of new members to car clubs (i.e. benefiting from free membership when moving to a development), 72% of respondents did not own a car. This fell further to 77% of members not owning a car once they had been a member for 6 months as a result of members selling/disposing of a car and not replacing it.

2.1.31 Accordingly, car club membership provides for reduced car ownership and as such, the local car club operator, Zipcar, has been approached to determine the level of demand/support for a car club. Zipcar has confirmed support for **provision of three years free car club membership to all new residents**, but not the provision of a car on site. This is in recognition of "a number of proposals where we have committed to install vehicles and if we are successful on these schemes, we would recommend that residents use this existing network of vehicles." (Zipcar Proposal provided in full at Appendix C).

2.1.32 In addition, the Zipcar proposal acknowledges the following;

"In our opinion a car club could work well at this location given support from the developer in the early phases of the development. The current proximity to local transport links is good (approximately PTAL 5) which is encouraging for the car club's chances of success, as synergy with public transport links is a key contributor to good car club performance. This makes it likely that the residents of this development will not need a car for work – essential to the success of the scheme."

2.1.33 On this basis, Zipcar will be secured as the car club membership provider for the proposed development within the S106 agreement. This further serves to limit car ownership at the appeal site given future occupiers would have access to a car in the instances these are needed but do not require the permanent ownership of a vehicle.

2.1.34 The above paragraphs demonstrate there is no case to refuse the proposed development on the grounds of car parking as contested by LBH in their Reason 6.

2.2 Reason 7 – Loading Bay

2.2.1 Paragraph 3.4 of the SoC suggests the policy basis for a sustainability corridor is contained within Policy SA 5 of the draft LBH Local Plan Part 2 (March 2019). The SoC then refers to Appendix 2 of the SoC, which is a drawing prepared by Makeover Architects (drawing reference Date 171020 Rev 01 Description P2 - Planning Application CHK SJ).

2.2.2 The drawing, intended to counter the appellant's position that the sustainability corridor may not come forward (paragraph 2.3.6 of the i-Transport Technical Note – 'Reason for Refusal 7', ref ITL14154-011 TN) simply shows the area of land safeguarded within the Nestles Factory scheme to allow the corridor to be delivered at a later date. However, this still does not demonstrate the physical design of such a link. In addition, whilst there is policy basis, it does not disprove the idea that the full link may not come forward at all, since it requires all land to facilitate it becoming available to LB Hillingdon, either through redevelopment proposals such as this where land is required to be offered up as part of the planning process, or in the future potentially via a CPO process.

- 2.2.3 Paragraph 3.4 of the SoC states that there is clear intention by LBH to implement the sustainability corridor in Policy SA5 (Policy SA5 of the LBH Local Plan Part 2 – Site Allocations and Designations (with Modifications March 2019). However, as quoted in paragraph 3.4 that very Policy states that it allows for ‘the introduction of **potential** public transport improvements’ which is not considered a clear intention to implement. The term potential is akin to possible, prospective, could-be, which is far from a clear intention.
- 2.2.4 In addition, this specific text relating to the delivery of such a route was only introduced in the March 2019 version of the LBH Local Plan Part 2 for additional consultation and is now reflected in the Inspectorate’s examination schedule of main modifications (MM39). This text did not feature within the previous 2015 version. Accordingly, at the time of the application being prepared, submitted and considered by LBH there was **no reference** to a sustainability corridor in Policy SA 5. A copy of Policy SA 5 as was presented in the 2015 version of the Local Plan Part 2 is provided at Appendix D.
- 2.2.5 Notwithstanding the above, the proposed scheme has made allowance for the sustainability corridor to come forward and the plans reserve the same extent of site frontage as the adjacent Nestles Factory site to enable sustainability corridor to be delivered.
- 2.2.6 There is no acknowledgement by LBH of the existing scenario or the interim period prior to the sustainability corridor being delivered. Therefore, thought must be given to the potential impact of the proposed development both in the short term (with and without the sustainability corridor in place) and in the longer term (with and without the sustainability corridor in place), given there is no clear commitment to deliver the corridor within a specified timeframe set out within Policy.
- 2.2.7 For servicing during this interim period, an **off** carriageway loading bay is proposed (temporarily diverting the footway around the loading bay to ensure pedestrian facilities are maintained until such time as the full sustainability corridor is introduced). This would mean that a delivery vehicle could safely park off-carriageway retaining the free-flow of traffic on Nestles Avenue. Goods would be transported into the site manually from the vehicle across the footway as is the case at present. This would provide a net benefit in terms of safety and the free flow of traffic on Nestles Avenue compared to the existing situation since it would remove the need for delivery vehicles to park **within** the carriageway and unload on the single yellow line as they can and do today. The notion that an off-carriageway loading bay will restrict the free-flow of traffic on Nestles Avenue is unfounded as vehicles will be able to park in a location clear of traffic flow and thus, there is nothing to cause a conflict to the free-flow of traffic.
- 2.2.8 At Paragraph 3.6, the LBH SoC goes on to consider the design of the proposed loading bay;

“Current highway guidance contained within the 'Traffic Signs regulations and General Directions 2016' document which is further supported by the 'Traffic Signs Manual Chapter 3 Regulatory Signs' 2019 document, specifically section 13.15.3 states that the width of the bay should be appropriate to the type of vehicle it is to be used by. It is the councils view that standard service and delivery vehicles comprise a width of 2.55m. An on-street loading bay should measure a width of 2.7m. The submitted drawing shows a width of 2.5m only. The proposed layby is therefore unacceptable.”

2.2.9 As part of the design of the loading bay, consideration was given to vehicles likely to use it. These are primarily small online-shopping delivery vans/postal/transit vans (determined through the use of the TRICS database, which identifies for similar developments, 90% of deliveries are made by light goods vehicles) with a typical width of 2m according to the AutoTRACK library as well as an occasional refuse vehicle with a width of 2.5m. Notwithstanding this point, Drawing ITL14154-007 Revision A, is an outline design only and not a detailed drawing. It is not for this application to implement the final sustainability corridor design, rather provide the space to allow a corridor to be delivered. The outline design shown in GA-007A includes the principle of the sustainability corridor and demonstrates how the servicing arrangement would work with the corridor in place in a manner which protects all road users, focussing on the needs of vulnerable users.

2.2.10 With regards to the Traffic Signs Manual, paragraph 13.15.3, states the bay “should be appropriate to the type of vehicle it is to be used by”. A bay of 2.5m is more than adequate in allowing for servicing vehicles and is in line with many examples that exist on London streets; additional information is provided in para. 2.2.24 below.

2.2.11 Paragraph 3.7 of the LBH SoC then addresses the future operation of such a bay, stating;

“The proposed arrangement is intended to remove the need for larger goods vehicles to cross the footway/cycle way in order to gain access to the application site. However, the development will generate a significant level of associated servicing and delivery trips which will require frequent dragging/wheeling/carrying across the Multi Modal Spine shared use footway/cycleway section which is seen to have a detrimental impact upon the safety of vulnerable road users.”

2.2.12 The TRICS database was used to determine the delivery and servicing demands of the proposal; an industry standard tool. As contained within the Framework DSP (i-Transport ref: ITL14154-004a TN DSP) prepared in support of the application, this identifies a worst-case of 15 deliveries could be received per day; this is not considered a significant level of activity. Two-thirds of these would be associated with the residential element of the proposals and would likely consist of parcel deliveries and online grocery shopping deliveries/takeaway food deliveries (i.e. small items that would likely be carried or moved by small trolley to/from the site). The remaining deliveries would be associated with the commercial unit with daily visits consisting of general supply deliveries (i.e. stationary, etc- again

items that would be carried or moved by trolley) – noting it has been shown as a worst-case B1a use – D1 uses can be anticipated to have similar or reduced demands.

- 2.2.13 On the basis of low delivery demands, this arrangement is seen as preferential, i.e. carrying goods by hand/trolley, rather than having large vehicles crossing a 'sustainability corridor' (inclusive of a parkland space) up to 30 times per day (15 movements in, 15 movements out) which would be in daily conflict with both pedestrian and cyclist movements. The design proposed focuses on the needs of all users and particularly vulnerable road users.
- 2.2.14 LBH propose that the site should retain loading internally which would require vehicles to cross the sustainability corridor approximately 30 times per day. It is unclear how a solution for vehicles to cross the sustainability corridor (designed to protect pedestrian and cycle users from vehicular traffic) would be a safer solution than a person manually carrying or trolleying goods across the corridor from a vehicle which is retained in a dedicated bay adjacent to the highway (but fully clear of the carriageway).
- 2.2.15 The reduction in site area necessary to allow for the 'sustainability corridor' requested by LBH was one of the factors which contributed to the requirement for an external loading bay for servicing and deliveries as there would be insufficient space on site to enable service vehicles to access, turnaround and egress safely. Another contributing factor was that, Policy SA 5 of the LBH Local Plan Part 2 (October 2015) (current at the time the application was prepared and submitted) required developments in Sites B and C, within which the appeal site is located, to retain a minimum of 50% of each site with employment generating uses (n.b. revisions to this policy were introduced at examination, recommendation MM39, which no longer specifies an amount, but still requires a proportion of employment generating uses that are compatible with residential uses).
- 2.2.16 Therefore, reducing the site area to provide the sustainability corridor (requested by LBH) and also requiring employment generating uses (requested by LBH) severely restricted the ability for on-site turning of delivery and servicing vehicles.
- 2.2.17 The use of a loading bay where on-site servicing is impractical, is recognised as the next preferential method of accommodating deliveries within the emerging London Plan (July 2019). Supporting text to Policy T7, Deliveries, Servicing and Construction reads;

'To reduce the pressure on London's streets, developments should provide for deliveries and servicing offstreet where possible, and through dedicated loading bays if not.'

'Where loading in the carriageway is unavoidable and the impacts can be made acceptable, it should be designed to minimise the impact on people walking or cycling and other road users.

- 2.2.18 Thus, a loading bay is considered a reasonable and acceptable means of servicing whilst also reserving space for the sustainability corridor and meeting the requirement for employment generating uses.
- 2.2.19 Currently deliveries are permitted to be made to the single yellow line along the site frontage, which does not have any loading restrictions in place. Thus, a vehicle can currently park on Nestles Avenue, **within** the carriageway, and goods can be transported across the footway and into the site.
- 2.2.20 In the absence of a 'sustainability corridor' the proposed development would improve the existing access to modern design standards suitable for use by vehicles accessing the on site parking bays. For servicing, a loading bay is proposed (temporarily diverting the footway around the loading bay) with goods transported into the site via the footway as at present. This would provide a net benefit in terms of safety and the free flow of traffic compared to the existing situation as delivery vehicles would not need to stop within the carriageway.
- 2.2.21 The provision of a 'sustainability corridor' provides another reason in support of a loading bay. It is understood a 'sustainability corridor' would include a dedicated cycleway and area of high-quality public realm. Therefore, removing the need for larger vehicles (anything larger than a car) to cross the proposed footway/cycleway would reduce the frequency of conflict with pedestrians and cyclists to the benefit of highway safety.
- 2.2.22 This approach is completely in accordance with emerging policies DMT 2 and DMT 5 which seek safe and convenient access for pedestrians and cyclists via high quality public realm. The prevention of large vehicles crossing the 10m wide sustainability corridor significantly reduces the likelihood of conflict.
- 2.2.23 In the absence of detailed design guidance for a 'sustainability corridor', reference has been made to The London Cycling Design Standards which provides good practice guidance as to good cycle track design and its interaction with loading.
- 2.2.24 At Section 4.2.6, the document recognises that;

'... continuous separation between cycles and motorised vehicles can be achieved through positioning the cycle lane/track between parking or loading bays and the kerb... (i.e. carriageway edge) ... When compared to marking lanes on the offside of parking, this method requires little additional space, is unlikely to lead to any overall loss of parking and represents a high level of service for cyclists in terms of safety and comfort.'

- 2.2.25 There are numerous locations across London where this exact arrangement is in use, see Plate 2.1 overleaf which shows the North-South Cycle Superhighway on Blackfriars Road.

Plate 2.1 – Loading Bay adjacent to Cycle Lane – Blackfriars Road

2.2.26 In addition, LBH recently granted permission for a half-on, half-off loading bay as part of a residential/retail application at 30-32 Blyth Road. The development is larger than this application site, 118 units and 330sqm of A1 retail space, and was estimated to attract 19 deliveries per day. A copy of the proposed arrangement for the half-on half-off loading bay is shown at Appendix E. Whilst the distance over which goods have to be carried is not as great, the frequency of doing so is higher. Blyth Road is also a one-way road which accommodates a bus service. This arrangement blocks part of the carriageway, by nature of the half-on/half-off arrangement, but does not prevent passing vehicles and was considered safe and in accordance with Policy by LBH in their determination of the planning application.

2.2.27 This application proposes a fully off-carriageway loading bay since space is available, and the design is a betterment compared to an arrangement previously, and recently, accepted by LBH as well as being a betterment upon the existing situation.

- 2.2.28 Paragraph 3.9 of the LBH SoC suggests concerns with external demands placed on the loading bay. This can be dealt with by introducing a Condition requiring preparation of a Delivery and Servicing Plan (DSP) prior to occupation and requiring the site to be operated in accordance with that DSP. Many sites, that are far larger and far more complex than this development operate with a single loading bay and it will be a matter of enforcement and the choice of Traffic Regulation Order placed on the bay which can be controlled by LBH.
- 2.2.29 For example, the bay could be limited to loading activity for a maximum period of time (i.e. 20, 30 or 60 minutes), more than sufficient for the delivery of small goods into the adjacent site. This would provide the ability for up to three vehicles to use the bay within an hour and potentially more should they not occupy the bay for the full period specified. In a 12-hour period (0700 – 1900), from which the TRICS data has been derived, there would be capacity within the bay for at least 36 delivery vehicles if the time period applied was 20 minutes. This development would provide delivery demands of 15 vehicles in this 12 hour period and therefore capacity for any other demands would also be available.
- 2.2.30 Paragraph 3.10 and 3.11 of the LBH SoC states insufficient information has been provided regarding waste/recycling. However a suggested condition requires further information to be provided as is standard at developments across London. It has been discussed that a management company will move the bins to the edge of the public highway, but not onto the highway, on collection days. Alternatively, should LBH not elect to collect refuse, private refuse collection would be adopted.

2.3 Other Considerations

- 2.3.1 LBH suggest within their SoC that a contribution be made towards additional bus capacity. This request has not come from Transport for London who operate all bus services in the vicinity of the site, and it has not been indicated or evidenced that there are any capacity constraints on local bus services. The appropriateness of such a contribution is therefore queried since a contribution must be in scale and kind to the development and its impact.
- 2.3.2 TfL, who control bus services and infrastructure in the area and whom any contribution would be payable to, state in their formal response to the application *'The development is proposed to generate an additional 23 trips on the bus network in each of the peak hours. Given the sites location in close proximity to a number of bus routes, the proposed trips can be accommodated on existing services, and therefore **TfL does not request any financial contributions towards mitigating the impact of the development**'*.

SECTION 3 POLICY COMPLIANCE

3.1.1 Based on information contained in Section 2.1, it is considered the development proposals are compliant with;

- Policy AM7 (Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012),
- Policy AM14 (Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012),
- LBH Adopted Parking Standards Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012);
- Adopted Supplementary Planning Document HDAS: Residential Layouts;
- Policy DMT 6 of the emerging Local Plan: Part 2 (March 2019),
- Policy 6.12 of the London Plan (2016);
- Chapter 9 of the NPPF (2019); and
- Policy T6.1 of the emerging London Plan (July 2019).

3.1.2 Based on the information contained in Section 2.2, it is considered the development proposals are compliant with;

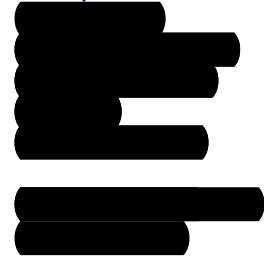
- Policy AM7 (Hillingdon Unitary Development Plan Saved Policies (November 2012),
- Policy DMT 2 of the emerging Local Plan: Part 2 (March 2019),
- Policy DMT 5 of the emerging Local Plan: Part 2 (March 2019),
- Policy 6.12 of the London Plan (2016);
- Chapter 9 of the NPPF (2019); and
- Policy T7 of the emerging London Plan (July 2019).

3.1.3 To summarise, the evidence set out within this supplemental statement concludes that the proposed development accords with Policies relating to both car parking and loading/unloading and the justification provided by LBH for their two highways reasons for refusal (Reason 6 and Reason 7) are not justified or supported.

APPENDIX A. TFL RESPONSE TO LBH LOCAL PLAN



Transport for London



Julia Johnson | Planning Policy Manager
London Borough of Hillingdon
localplan@hillingsdon.gov.uk

2/5/2019

Dear Ms Johnson,

Thank you for consulting TfL on the proposed Main Modifications to LBH Local Plan Part 2.

We are very disappointed that the parking policies and standards set out in LBH's Local Plan Part 2 remain as proposed. Unfortunately, this will have many adverse implications, not just for your own residents and visitors but those in other boroughs and for London as a whole, and it goes against the vision for 'good growth' established in the London Plan.

This includes undermining the delivery of housing and employment growth targets, as high levels of parking will constrain the amount of development in the borough given the limited land available, as well as its quality and that of the street environment and surrounding public realm. Crucially, it will also add to congestion on the road network in and around Hillingdon, with associated negative economic, environmental and health impacts.

We do recognise that despite improvements being made to public transport and active travel in the borough, including the delivery of the Elizabeth line, car travel will continue to play more of a role here than in some other boroughs, particularly in some parts of the borough that are less well connected. The London Plan recognises this. In Hillingdon, however, the less connected places are identified for little if any growth. Conversely, significant growth is forecast in the better connected areas (see Figure 1 in Appendix B), particularly around Uxbridge and Hayes. High parking standards are especially concerning in these and the other PTAL 4 -6 locations (see Appendix A) that are best served by public transport and are generally in close proximity to local services and facilities. It is here, particularly, where both the direct and opportunity costs will be greatest.

It is the poorer families in our city who are disproportionately impacted by the congestion and emissions resulting from high levels of parking - with their bus journeys slowed, air pollution increased and severance worsened. Congestion, emissions and public health are challenges facing our city that span administrative boundaries and all boroughs must make an appropriate contribution to addressing them. This approach is increasingly being recognised by other outer London boroughs, including the London Borough of Merton which has recently published a draft Local Plan that follows the approach set out for parking in the draft London Plan. Other boroughs such as Hounslow, Bexley and Croydon also take a more mixed approach to parking, recognising that well connected parts of outer London can have successful car free and car-lite development.

We are aware that LBH have submitted the 'Parking Standards Justification: Assessment of Available Data' report to the London Plan EiP Library, which argues for more generous provision in the borough and states that input from TfL was considered. However, as summarised in our updated written statement on the Local Plan which we sent on 26 July 2018, we highlighted serious flaws in the methodology and errors in the conclusions that were not addressed in the final report. We therefore set out reasons why we do not believe this report is sound evidence in a rebuttal, which we attached as an appendix to our written statement for Matter 8I in the London Plan EiP. We have attached this report for reference in Appendix B below.

The Mayor's Transport Strategy (MTS) and draft London Plan set a clear strategic policy direction which prioritises mode shift from car travel. This is to enable London to grow sustainably - without changes to the way some Londoners travel, the city will simply not be able to provide sufficient housing to meet the objectively assessed need, and we will not be able to meet the challenges set out in the London Plan in terms of congestion, health, environment, or ensure a liveable, inclusive city.

We therefore remain firm in our objection to the parking standards set out in Policy DMT 5, Policy DMT 6 and in Table 1b in Appendix C of Hillingdon's Local Plan Part 2, which will undermine the ability to manage demand on the road network and make the best use of land – a scarce resource in our growing city.

Yours sincerely,

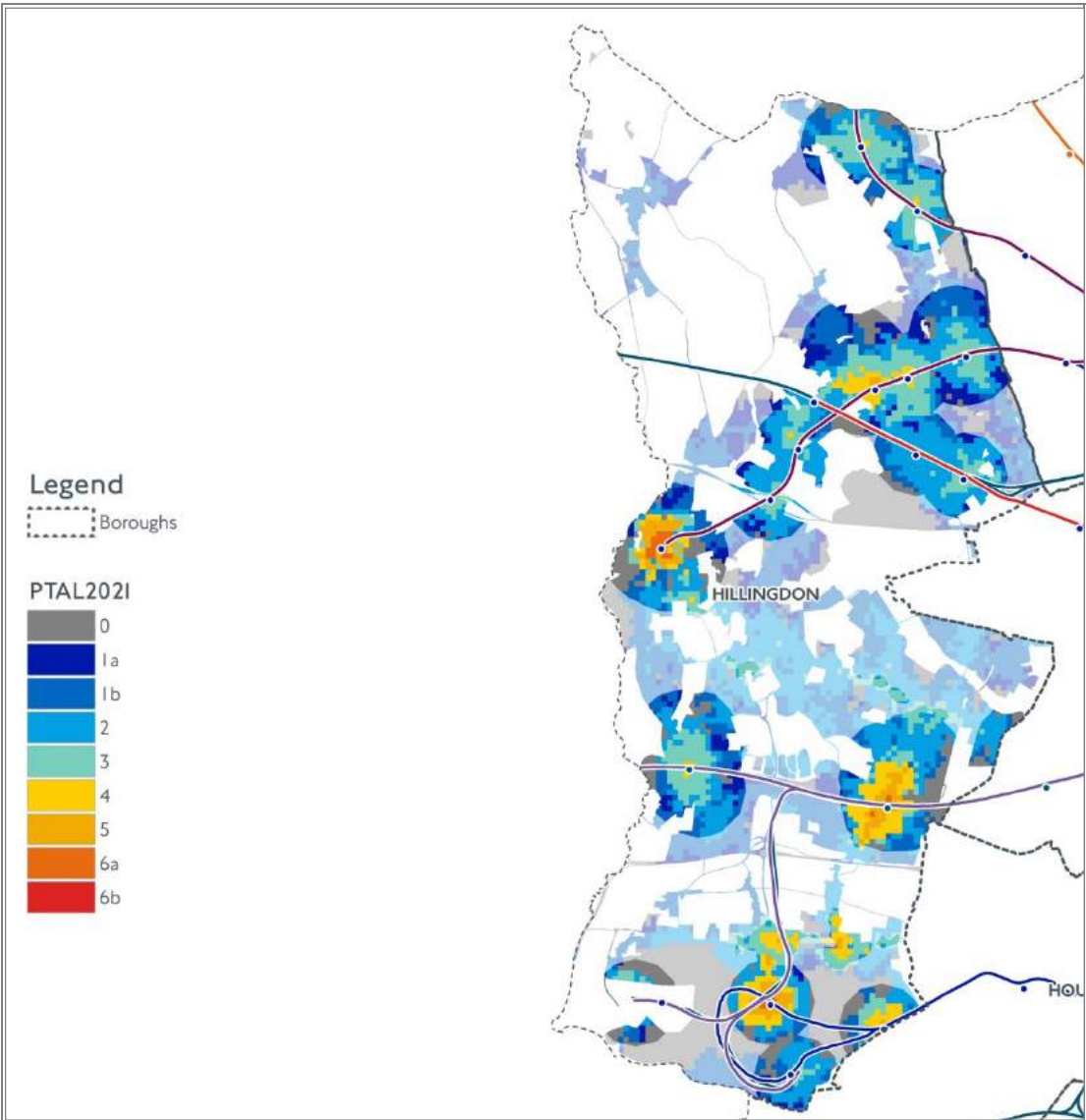
Josephine Vos

Josephine Vos | Manager

London Plan and Planning Obligations team | City Planning

Email: [REDACTED]

Appendix A: 2021 PTAL map of Hillingdon



Appendix B - Rebuttal to London Borough of Hillingdon's Parking Standards justification: Assessment of Available Data

1. INTRODUCTION

The report 'London Borough of Hillingdon's Parking Standards Justification: Assessment of Available Data' (NLP/AD/25) seeks to justify parking standards that are higher than the adopted London Plan maximum standards, and presumably has been submitted to inform the discussion on the draft London Plan parking standards. As part of engagement on the local plan process, TfL provided comprehensive comments to LB Hillingdon highlighting a number of concerns with the methodology used, but the vast majority of these comments have not been reflected in the final report. Most fundamentally, **the analysis does not attempt to examine journey patterns that are representative of Hillingdon residents, and does not consider the fact that growth is expected to be focused in well connected locations**¹. We therefore argue that this document is not sound evidence and that the claim on page six stating 'this presentation takes into consideration feedback from TfL' is potentially misleading.

2. CRITIQUE OF FINDINGS AND METHODOLOGY

The report attempts to justify higher parking provision on the basis of 'unique challenges' within the borough, in particular:

Claim 1: A high proportion of residents (86%) live in areas of Public Transport Access Levels (PTAL) 2 or below and the impact of the Elizabeth line is limited (pages 8-11)

While this is an accurate statement in isolation, it is **not relevant to residential parking standards, which apply only to new development, as growth will be focused in well connected locations**. In Hillingdon's case, 71 per cent of large site SHLAA capacity between 2020-29 is in areas of PTAL 3-6.²

Furthermore, it is true that the Elizabeth line will have limited effect on PTAL in Hillingdon, but it does increase the level at Hayes, where significant growth is planned. More importantly, the Elizabeth line will provide wider connectivity enhancements, with quicker journey times to key destinations and interchanges such as Tottenham Court Road, Stratford and Canary Wharf (which, as noted, is not fully captured by PTAL alone).

Claim 2: Most trips are quicker by car and few can be switched to other modes (pages 12-17)

LB Hillingdon's definition of trips is highly unrepresentative: 9 of the 13 locations chosen represent³ fewer trips made by Hillingdon residents than just 2 locations - Uxbridge and Hayes, where most of the growth is focused. This is likely because the

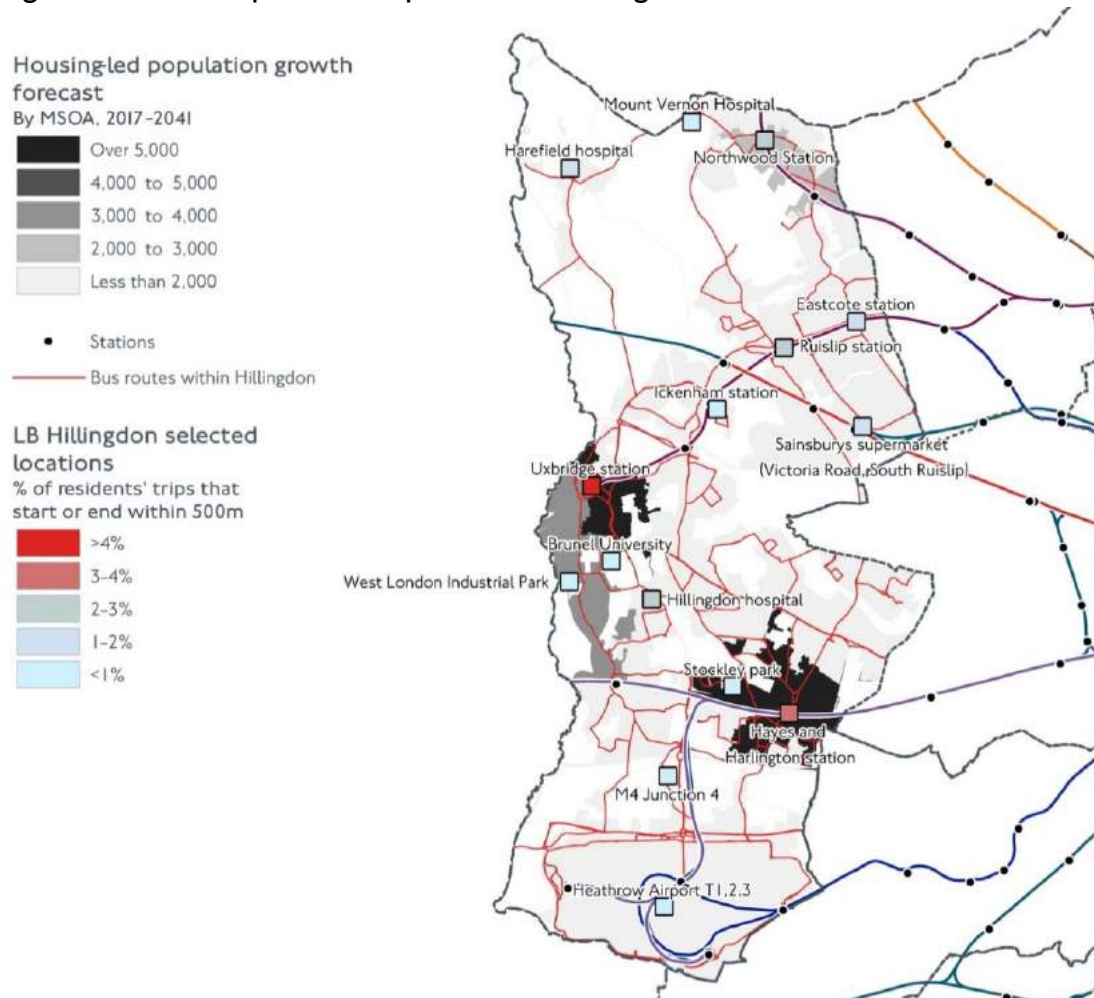
¹ GLA/TfL analysis of SHLAA sites

² GLA/TfL analysis of SHLAA sites

³ Our analysis of the London Travel Demand Survey shows that 8.5 per cent of Hillingdon residents' trips start or end within 500m any of Stockley park, the M4 Junction 4, Mount Vernon Hospital, Brunel University, West London Industrial Park, Ickenham station, Harefield hospital, Eastcote station or Northwood Station. In contrast, 10.0 per cent started or ended within 500m of either Uxbridge or Hayes and Harlington stations.

destinations include trips between locations such as hospitals, an industrial park and the M4 junction 4,⁴ which very few people will travel directly between (if travelling to these locations at all). Figure 1 below shows that most of the destinations analysed on page 12 of the report are within close proximity to Hillingdon's growth areas around Uxbridge and Hayes and could be reasonably easily reached by public transport or active modes.

Figure 1 – Growth, public transport and LB Hillingdon's selected destinations



Source: GLA housing-led population forecast and London Travel Demand Survey

The assessment of journey time does not appear to capture delays due to congestion or the time it takes to park and walk to the final destination, both of which are highly likely to get increasingly worse over time if high levels of car-dependent development are delivered.

Further journey time comparisons involving access to five 'key' destinations are then made (three of which are represented above, plus Heathrow and a particular Sainsburys store) for example, claiming 97 per cent of Hillingdon's population are able to travel to Uxbridge town centre within 30 minutes by car but only 40 per cent can reach it within 20 minutes by public transport (it is not clear why different journey

⁴ Only 0.1% of trips made by Hillingdon Residents start or end within 500m of the M4 Junction 4 – London Travel Demand Survey

durations are used here). Again, this is not relevant to new residential developments, which will not be distributed in the same way as the existing population. Indeed, much of Hillingdon's growth will take place in and around Uxbridge and Hayes town centre.

The same flawed origin and destination methodology was used to analyse cycling potential (for example the 'M4 Junction 4' is unlikely to be an appealing destination for people who are cycling) which 'eliminates' 71 per cent of the unrepresentative sample of car journeys. The analysis also takes trip distances from commute trips which, aside from being a small minority of trips,⁵ tend to be made over longer distances than journeys made for other purposes, and therefore understate how 'cyclable' the majority of trips are.

Our analysis, updated in 2016⁶ (which was not reflected in the report), looks at journey distances, encumbrance, age and other factors, and suggests **58 per cent of Hillingdon residents' car trips could be cycled, and a further 6 per cent that are not cyclable could still be made by public transport within a similar journey time to the car**. This is for all Hillingdon residents, and the potential for sustainable mode use will be significantly higher in the better connected areas where future growth is concentrated. Where growth occurs in less well connected areas, the proposed London Plan standards will enable greater levels of car ownership.

Claim 3: Points of interests are not accessible enough by public transport (pages 18-21)

The analysis appears to selectively group PTAL 3 with lower levels of PTAL, and the same figures could equally be presented as 54 per cent of points of interest are within PTAL 3-6. Again, no attempt is made at determining likely demand to each of these points (for instance, a car repair facility will not be of interest to someone who does not own a car, nor will it be a weekly, monthly or even regular destination for the vast majority of households) or indeed how close people live to such services (given the proportion of current residents that live in PTAL 2, it is not surprising that amenities also locate there, but these will often be accessible by foot or cycle if not by public transport).

Claim 4: Car ownership is high in Hillingdon, ownership does not translate to use and many cars are not used for commuting (pages 22-29)

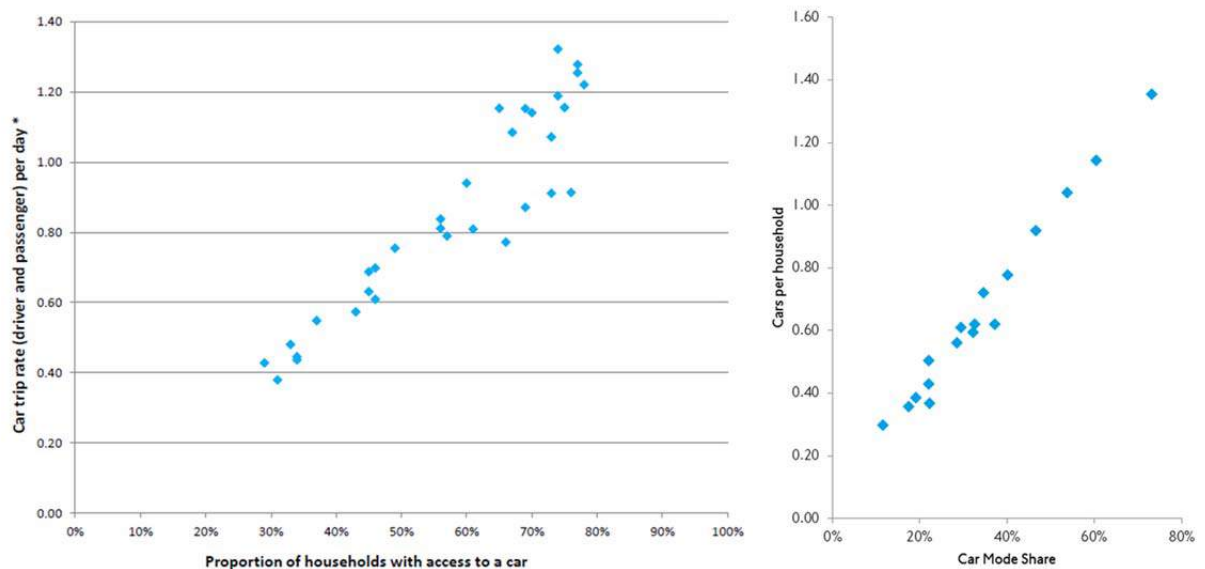
It is true that car ownership across Hillingdon as a whole is high for London, but ownership does vary by public transport access, and **almost half of Hillingdon households in PTAL 4-6 do not own a car**. This is similar to well connected areas of other London boroughs on the GLA boundary and suggests that car ownership in Hillingdon is in part explained by its distribution of PTAL, rather than a need for greater parking provision at higher PTAL, where growth will be focused. We also contend that local policy influences ownership levels and that ownership does not necessarily imply need.

⁵ 12 per cent of trips in Hillingdon are for commuting purposes, London Travel Demand Survey

⁶ Analysis of Cycling Potential 2016 (2017) Transport for London: <http://content.tfl.gov.uk/analysis-of-cycling-potential-2016.pdf>

LB Hillingdon also appears to be claiming that ownership does not necessarily translate into use, specifically travelling to work. While there are several factors that influence this relationship, the Hillingdon analysis, again, only uses commuting car trips rather than all trips, and when more comprehensive and granular data is considered (such as all London boroughs or PTAL within inner and outer London, as shown in Figure 2) a much clearer relationship emerges.

Figure 2: Household car ownership vs average car trip rate by borough (left) and average number of cars per household and average car mode share by inner and outer London PTAL (right)



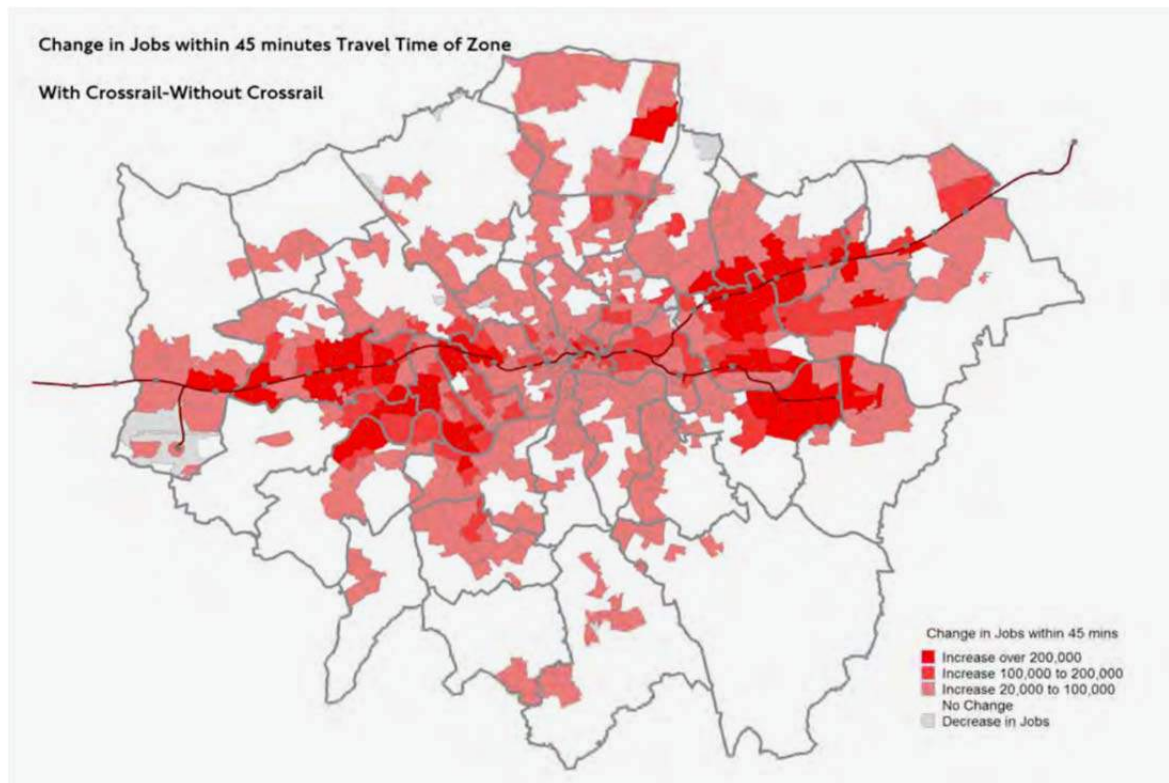
*based on the average daily trip rate over a seven-day week

Source: London Travel Demand Survey

Claim 5: Cars are important for Hillingdon residents to travel to work (pages 30-40)

This claim does not sit particularly well alongside the previous section, as the argument appears to simultaneously state both that cars are important to access work and that they are not necessarily used to travel to work. Nevertheless, it is true that existing Hillingdon residents are less likely to work in central London and more likely to drive to work than residents of other London boroughs. However, the analysis again does not consider residents of new development specifically. Hayes, for instance, will have a high quality, direct rail service to some of London's biggest employment destinations. This area will be one of those that benefits the most from the Elizabeth line (see Figure 3) and as such the commuting patterns of those living in new developments there would be expected to be significantly different to existing residents across the whole of Hillingdon.

Figure 3: Change in access to jobs within 45 minutes with the Elizabeth line



Source: Crossrail Business Case Update: Summary report, July 2011

For office parking standards, we acknowledge the relatively high proportion of workers in Hillingdon arriving from outside London. However, the standards for outer London (outside of opportunity areas, where public transport enhancements are targeted) remain the same as the previous Plan (1 space per 100 sqm) and the draft Plan retains flexibility for outer London boroughs such as Hillingdon to identify specific areas through their local plan where more generous standards should be applied (up to 1 space per 50 sqm), allowing for this evidence to be reflected.

3. CONCLUSION

The various limitations of this analysis, and in particular failure to include representative journey patterns or consider where growth will be located, lead us to conclude that the report is not sound evidence as it does not reflect observed journeys or the drive to locate new development in sustainable locations. As such, we do not believe it is relevant to discussions regarding strategic parking standards at a London-wide level, particularly as these standards already allow for greater provision in less well connected areas⁷ and in outer London as a whole.

⁷ The residential car parking standards set out in Policy T6.1 cater for existing levels of ownership where alternatives are more limited (see Figure 16, Residential Car Parking evidence report (2017) Transport for London)

APPENDIX B. CARPLUS ANNUAL SURVEY 2016/17
(EXTRACT)



Carplus annual survey of car clubs

2016/17

London

carplus
bikeplus
supporting shared transport



Prepared for Carplus by Steer Davies Gleave

Impact of car clubs on car ownership

Key findings

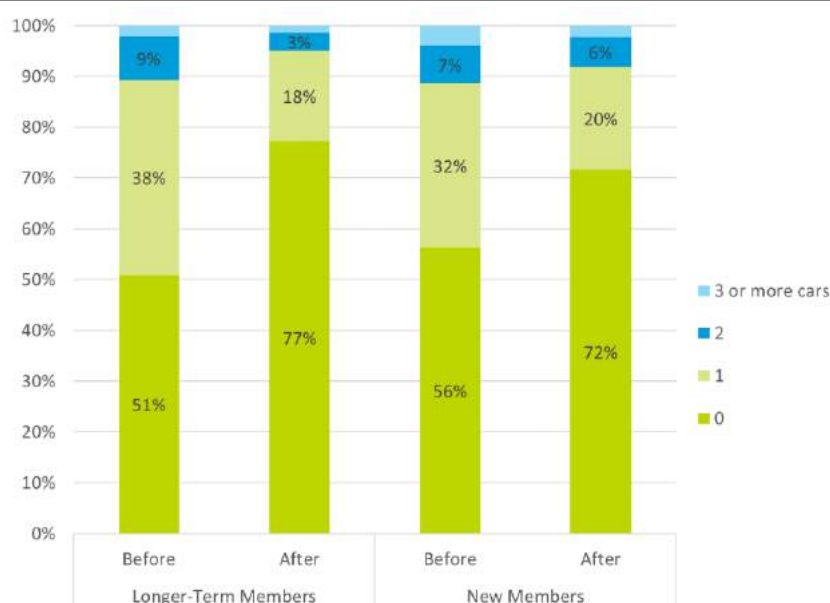
Car ownership remains low amongst longer term members

- 49% of respondents who were longer-term members owned at least one car before joining, falling to just 23% afterwards. Longer-term members are those who have been members for at least six months – many have been members for a number of years.
- 14% of respondents had sold or disposed of a car in the 12 months prior to completing the survey (24% new members, 11% longer-term members). One in four stated that car club membership was the main reason or a major factor in their sale / disposal decision.
- For each car club car, approximately 10.5 private cars are removed from the road as a result of members selling / disposing of a car and not replacing it. The average age of cars sold by respondents was 7 years. Of the respondents who sold or disposed of a car, one in three sold or disposed of a car that was more than ten years old.
- LTDS data from 2015/16 shows that 57% of households in London own at least one car. This compares to 23% of long-term member households and 28% of new members surveyed. For the sample as a whole, 24% owned at least one car.

Car ownership amongst new members falls after joining

- 44% of new members surveyed owned at least one car before joining, falling to just 28% afterwards, as shown below.

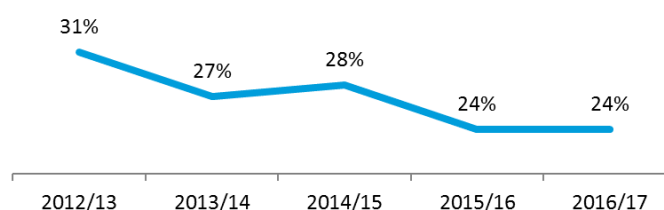
Chart: car ownership before and after joining a car club



Trends

Falling car ownership amongst members surveyed

The proportion of new members owning at least one car after joining has fallen since 2012/13.



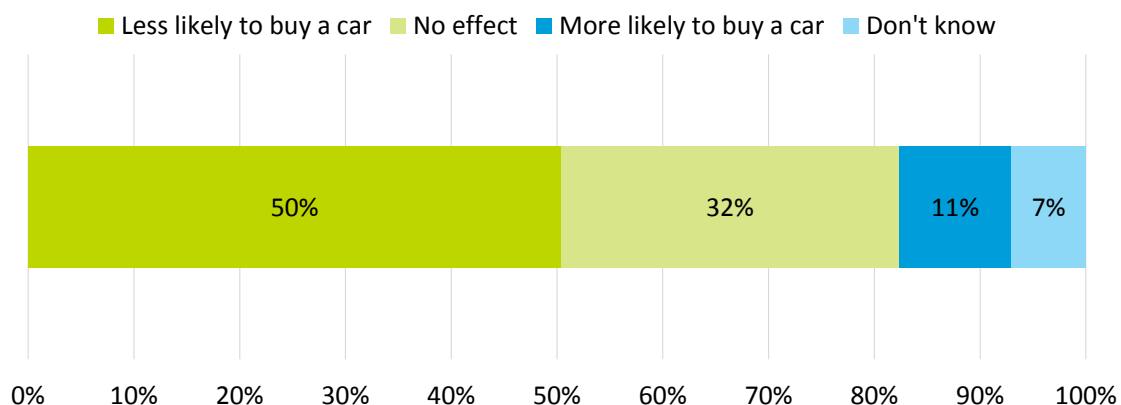
Impact of car clubs on car purchasing

Key findings

Car clubs reduce the need to purchase a private car

- 34% of new and longer-term members surveyed would have bought a private car if they had not joined a car club. This may equate to up to 66,644 deferred car purchases.
- As shown in the chart below, joining a car club has made it less likely that half of members surveyed will buy a private car.

Chart: Effect of car club membership on decision to buy a private car



Trends

Car clubs help to defer future car purchase by members

As shown in the table below, results from the 2016/17 survey indicate that car clubs continue to have an impact on the likelihood of purchasing a car. This also reflects the progressive move away from car ownership in the Capital (particularly amongst the under 30s) – increasingly people do not see car ownership as necessary or desirable.

Year	Respondents (overall) for whom joining a car club has made it less likely that they will buy a car in the next few years
2012/13	66%
2013/14	61%
2014/15	62%
2015/16	51%
2016/17	50%

APPENDIX C. ZIPCAR PROPOSAL



Nestle's Avenue **London Borough of Hillingdon** **i-Transport**

Proposal: July 2018

David Lang
UK Property Developments

DD: 0203 004 7860
dlang@zipcar.co.uk

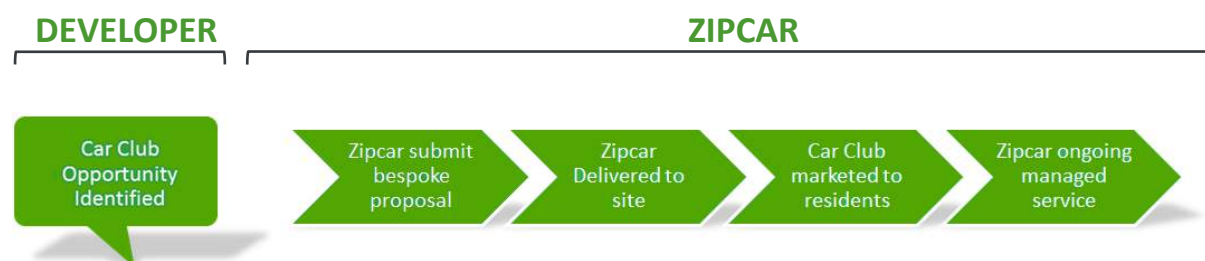


Zipcar & Property Developments

Zipcar works with an ever increasing number of Property Developers, Transport Consultants and Housing Associations across the UK to:

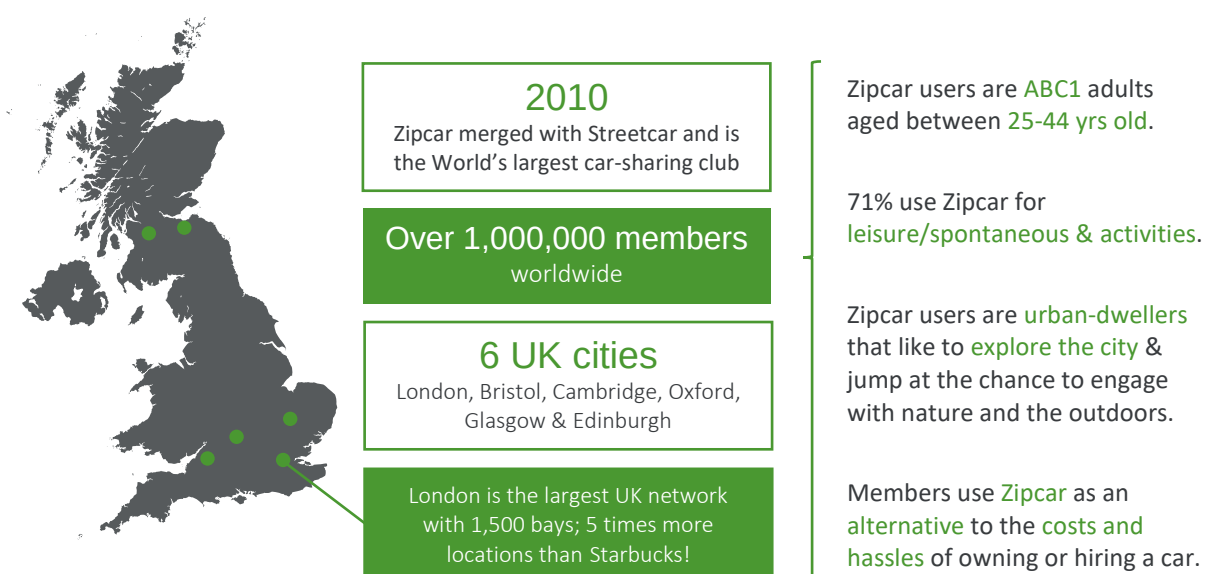
- ✓ Increase the likelihood of gaining planning permission on a site.
- ✓ Addressing specific Section 106 or Travel Plan requirements.
- ✓ Reducing the need to provide costly private parking.
- ✓ Act as a useful marketing tool to help sell properties with a limited parking provision.

Working with Zipcar – 5 Simple Steps



What is Zipcar?

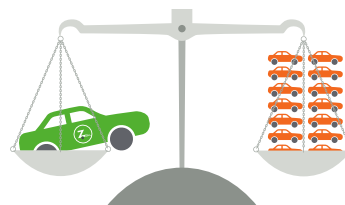
Zipcar is a pay-as-you-go car club designed to provide members with access to cars and vans as quickly and conveniently as possible with the least amount of hassle. Our team is passionate about bringing this innovative concept to every urban street as a simpler, more efficient, more sustainable way to use a car.



A Sustainable Transport Solution

A large proportion of your future residents may have a private vehicle, but may not really need one. They may commute to work using public transport and just have a car for occasional use. A relationship with the world's largest car sharing club would definitely assist in reducing the carbon footprint of your residents, provide a convenient and easily-used service, and save them a substantial amount of money.

Every Zipcar takes an average of 10-15 privately owned cars off the roads of the UK, because members often sell (or don't replace) a car when they join.



Zipcar is a service that benefits the whole community. We have found that car club members choose to drive a car less after joining Zipcar; the average car club member only actually clocks up between 403 and 414 miles a year which is significantly less than private vehicle owners. This is because they both make better use of public transport and think much harder about their transport options according to what they need to achieve and the cost associated with that decision.

Not only this but car club vehicles are typically between 10% and 33% more efficient in terms of carbon dioxide emissions per KM travelled, in comparison to the average car, because operators chose new and fuel efficient models.



Using Zipcar

The Zipcar process has been designed to provide simplicity and little administration – there are no depots or deposits involved (headaches typically found with regular car hire). Once the person has become a member there is no further form filling required to hire a vehicle anywhere in the world.



join



reserve



unlock



drive

Development Viability

Zipcar has been operating in the borough of Hillingdon since 2013 and is now working in partnership with the council to provide car clubs on-street to residents.

In our opinion a car club could work well at this location given support from the developer in the early phases of the development. The current proximity to local transport links is good (approximately PTAL 5) which is encouraging for the car club's chances of success, as synergy with public transport links is a key contributor to good car club performance. This makes it likely that the residents of this development will not need a car for work – essential to the success of the scheme.

The low parking on site should ultimately ensure good uptake of the car club. We normally rely on a parking ratio of less than 0.7 to guarantee car club success.

A developer funded marketing package will help ensure demand for the car on site; the more we are able to incentivise people to try the service, the more people will use it and consequently the time taken to reach commercial viability will be minimised. We have a number of proposals where we have committed to install vehicles and if we are successful on these schemes we would recommend that residents use this existing network of vehicles. We have up to 5 bays scheduled for 2020 and we would recommend reviewing this proposal closer to the occupation date of the project.

Nestle's Avenue Site Proposal

Zipcar recommends that residents use the existing network. Zipcar will provide a fully managed service, which includes the following:

- Offering three years membership to all 85 homes
- Designing all marketing collateral for the development communications team
- Managing the sign-up process (including licence and insurance eligibility processes)
- Monitoring resident and development queries and providing reports (if required as part of S106 requirements) post launch

This comes to a total contribution of £8,800+VAT. This sum is to be paid prior to the date of first occupation.

In exchange Zipcar would commit to a contractual obligation to run the car club operation at the development for a minimum of three years. Each resident that signs up during the three years will receive three years' free membership and Zipcar will offer £50+VAT driving credit per unit at no further cost to the developer. **A contribution of £4,250+VAT from Zipcar.**

Zipcar will provide 1 year's free business account (usually £119) for any commercial entity operating from or in conjunction with the site at no further cost to the developer.

Marketing Proposal

A free membership to Zipcar is an excellent marketing tool to utilise with prospective buyers who, due to low parking ratios and parking restrictions, are unable to have their own vehicle on site. We would market the free memberships as a benefit paid for by the developer that provides residents with a cheaper, greener more convenient alternative to private car ownership. In this way Zipcar

adds real value to the development and is an excellent solution to the recurring problem of prospective residents not being able to have their own vehicle on site due to a lack of space.

Developer communication

It is vital that the development's communications team promotes and supports the growth of the car club on site. Having a presence online either on the development website or through the residents' portal will ensure that all residents are aware of the transport modes and offers available to them and speed up uptake. Historically we have found most residents will use the service either to move into the property or for the subsequent furniture run within the first three months of occupation. Our marketing team will be able to provide copy or banners for the site, all of which will direct residents to a bespoke landing page educating them about the service.

Zipcar would promote its service to the residents of the development through a number of ways.

Bespoke marketing material: This would outline the offers your residents are entitled to. We find that this is crucial in generating early interest in the scheme; these would be part of each residents welcome pack. Additionally we would recommend that a mail shot is sent at a later date reminding residents of the service.

Advertising within the development: Zipcar would advertise within the development itself through posters and leaflets in communal areas.

The Zipcar Fleet

Zipcar has a vehicle type for every occasion. This will ensure that your residents get the best possible service, and can find a vehicle to suit their needs. Zipcar membership also includes Zipvan membership – providing our members with convenient access to larger vehicles when required.

Our vehicles are best in class from an emissions perspective. A Zipcar lives in the fleet for a maximum of eight months, ensuring our members are driving the most modern and efficient fleet in any car club across the world.

Model	Weekday	Weekend
	Hourly / Daily	Hourly / Daily
Toyota Yaris / Ford Fiesta	£6 / £54	£7.50 / £65
VW Golf / Ford Focus	£7 / £64	£8.50 / £75
Toyota Prius (PHEV)	£7 / £64	£8.50 / £75
Audi A3	£8 / £74	£9.50 / £85
Ford CMAX (7 Seater)	£10 / £94	£11.50 / £105
VW Transporter	£10 / £89	£11.50 / £105

Fuel, insurance and 60 free miles per 24 hours are included. Additional miles are 25p per mile (29p for premium vehicles and vans).

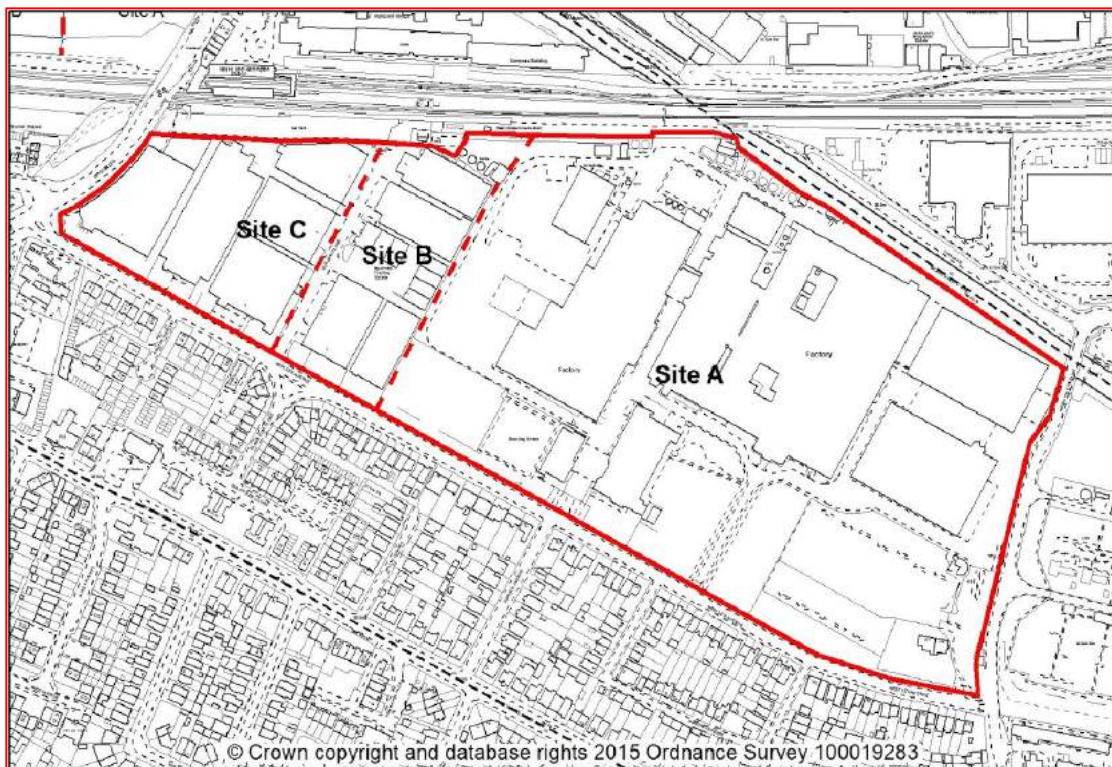
APPENDIX D. POLICY SA 5 – LBH LOCAL PLAN
PART 2 OCTOBER 2015 VERSION

New Homes

Land to the South of the Railway, including Nestle Site, Nestle Avenue, Hayes

In 2012, Nestle announced the planned closure of its Hayes plant, which is currently used for the manufacture of coffee. The Council is in the early stages of discussion with the landholders about the future of this key development site, but is seeking to bring forward a comprehensive development scheme that includes the adjoining site (Site B).

Proposals will need to take account of a wide range of policy considerations, including those related to transportation, heritage and the wider objective of encouraging economic growth in Hayes town. It is recognised that the final overall quantum of uses and the number residential units will be determined through discussions with key stakeholders and the development of a sustainable masterplan.



POLICY SA 5 40: Land to the South of the Railway, including Nestle Site

This is an important strategic site for Hayes town and the Borough as a whole. The Council will support proposals that meet the following criteria:

Site A

- The provision of up to 500 units. **Densities higher than 80 uph may be acceptable subject to high quality design.** Higher density development should be located along the canal frontage.
- **A minimum of 20 %** of the site (2.4 ha) should be used for employment generating uses. Suitable uses will include B1 and elements of B2 that are

New Homes

compatible with the residential elements of the scheme.

POLICY SA 5 10: Land to the South of the Railway, including Nestle Site

- Small scale commercial uses to support residential uses will be considered suitable.
- 10% of the site (1.2 hectares) should be used for open space and a sports pitch;
- Education facilities; and
- The provision of community facilities, including a public park.
- Proposals should include a heritage assessment which considers the retention and reuse of Locally Listed structures on this site.
- Proposals should include high quality design that fully integrates the Grand Union Canal, ensures canal-side improvements and maximises the canal's recreational potential.
- Development should contribute to the enhancement of the Strategic Canal and River Corridors in accordance with relevant policies on the Blue Ribbon network

Sites B and C

- The provision of up to 474 97 residential units on Site B and 110 residential units on Site C. Proposals should be consistent with the PTAL rating and take account of lower suburban densities to the south; and
- A minimum of 50% of each site (1.85 ha) should contain employment generating uses including B1 office, and suitable B2 light industrial.

As a preference Sites A, and B and C should form a comprehensive development scheme across the whole site, and which:

- Sustains and enhances the significance of the heritage assets;
- Provides pedestrian links to Hayes Town Centre and key transport nodes; and
- Reflects the Council's latest evidence of housing need in terms of the type and tenure of residential units.

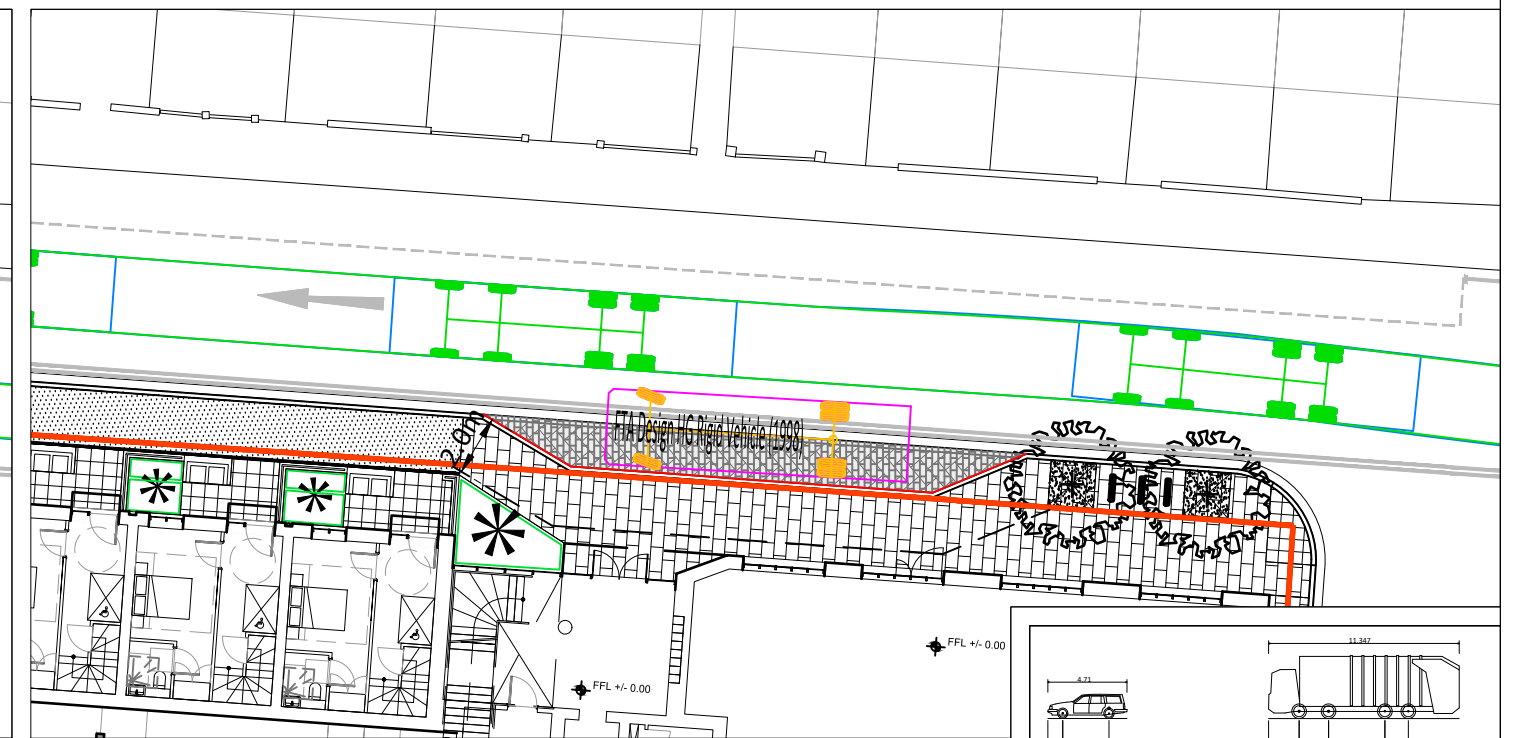
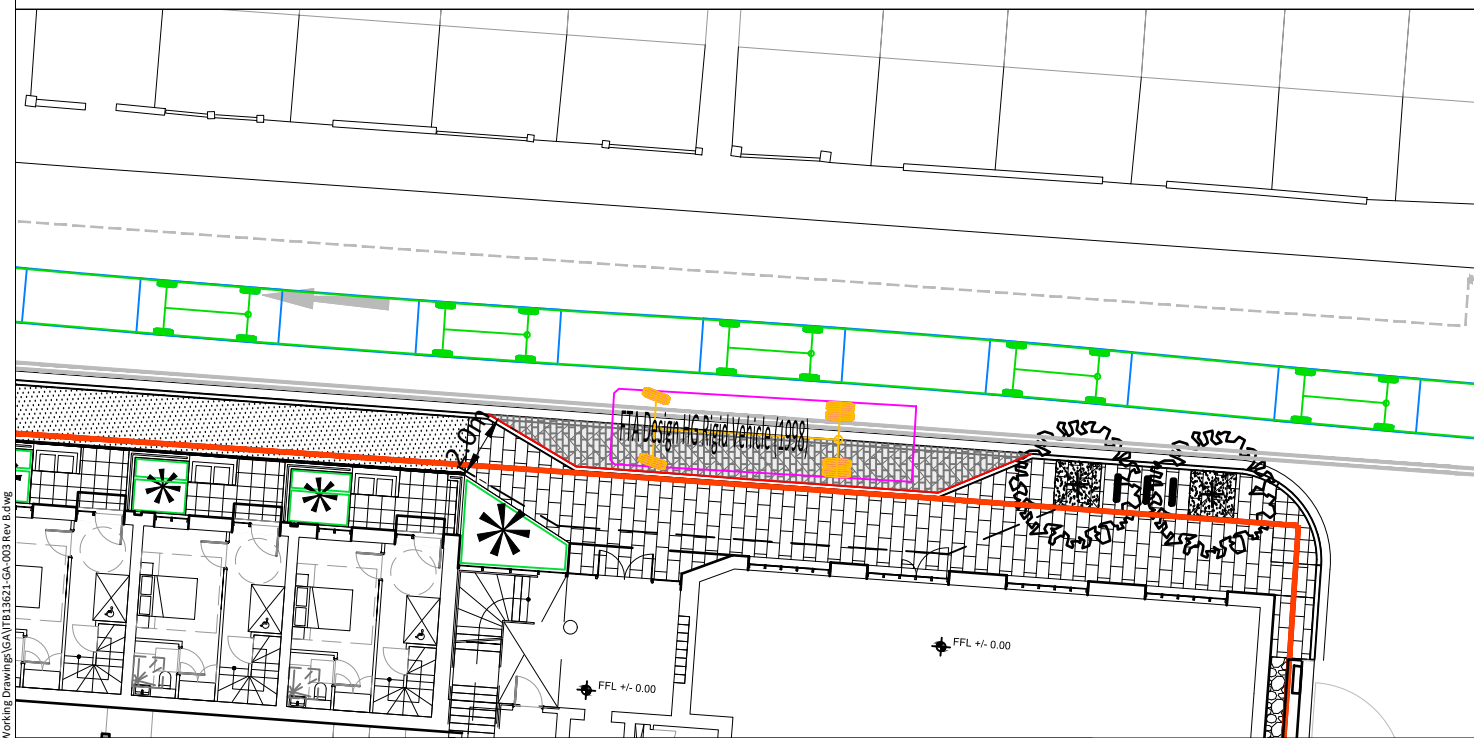
~~Development on both sites should meet the requirements of policies in other parts of the Local Plan.~~

New Homes

Site Information

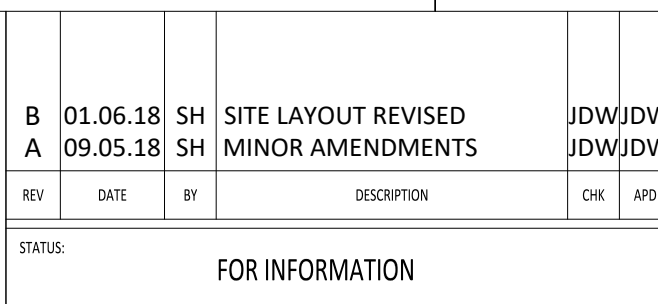
Site name	Land to the South of the Railway, including Nestle Site		
	Site A	Site B	Site C
Ward	Botwell	Botwell	Botwell
Location	Nestle Avenue/ Station Road	Nestle Avenue	Nestle Avenue
Area (ha/sqm)	12 ha	~~3.7 ha~~ 1.76 ha	2.2 ha
PTAL Ratings	1b, 2, 3	4	4
Proposed Development	Mixed use	Mixed use	Mixed use
Current UDP Designations	Industrial Business Area; Conservation Area; Locally Listed Buildings	Industrial Business Area; ~~Conservation Area~~	Industrial Business Area
Proposed New Designations	None	None	None
Existing Use	Industrial units	Industrial units, school, garages, caravan sales	Industrial units, garages
Relevant Planning History (Most recent)	No relevant history		
Proposed Number of Units	500	~~207~~ 97	110
Existing Units	0	0	0
Net Completions	500 units	~~207~~ 97 units	110 units
Infrastructure Considerations	The site is within close proximity to North Hyde sub-station and new buildings should not be located beneath power lines. Drainage infrastructure likely to be required. Site specific proposals should be discussed with National Grid and Thames Water at the earliest possible stage. Further infrastructure considerations are to be negotiated as part of the planning application.		
Flood Risk	Flood Zone 1; Flood Risk Assessment required.		
Contamination	Potentially contaminated land due to former land use. Land remediation may be required.		
Indicative Phasing	2021-2026	2021-2026	2021-2026
Other Information	None	~~Higher densities should be located adjacent to the canal.~~ None	Multiple land ownership on this site may affect the timescale of delivery

**APPENDIX E. BLYTH ROAD HALF-ON/HALF-OFF
LOADING BAY**



DRAWING ISSUED FOR FEASIBILITY CONSIDERATION AND PLANNING PURPOSES ONLY. DRAWING NOT TO BE USED FOR CONSTRUCTION. I-TRANSPORT LLP ACCEPT NO RESPONSIBILITY FOR ERRORS MADE BY OTHERS IN SCALING FROM THIS DRAWING. MEASUREMENTS SHOULD BE TAKEN FROM FIGURED DIMENSIONS ONLY. CDM REQUIREMENTS CONSIDERED AT FEASIBILITY STAGE ONLY. FURTHER CONSIDERATION REQUIRED BY DETAILED DESIGN TEAM.

Large Refuse Vehicle (4 axle)	11.347m
Overall Length	2.500m
Overall Width	3.751m
Overall Body Height	0.304m
Min Body Ground Clearance	2.500m
Track Width	6.005m
Lock-to-lock turn radius	11.330m
Wheelbase dimensions	1.82, 1.75, 3.352, 3.96m



REV: B

