

# Hayes Park, Hayes End Road, Hayes, UB4 8FE

## Transport Note - Response to GLA and Highway Authority Comments (Planning Ref: 12853/APP/2023/1492)

**Date:** September 2023

**Client Name:** Shall Do Hayes Developments Ltd

**Document Reference:** WIE19060.112.R.1.1.3.TN

This document has been prepared and checked in accordance with  
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

Issue	Prepared by	Checked by	Approved by
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## 1. Introduction

### General

- 1.1. This Transport Note ('TN') has been prepared by Waterman Infrastructure and Environment Ltd ('Waterman') on behalf of Shall Do Hayes Developments Ltd ('the Applicant') to provide highways and transport advice in relation to the proposed development at Hayes Park, Hayes End Road, Hayes, UB4 8FE ('the Site').
- 1.2. The local planning and highway authority are the London Borough of Hillingdon (LBH).
- 1.3. The development proposals are for the change of use of the existing office buildings (Use Class E) to residential use (Use Class C3). The proposed development will provide a total of 124 residential units (25 x Studios, 40 x 1-bed, 41 x 2-bed, 17 x 3-bed and 1x 4-bed units) and ancillary internal and external community space.
- 1.4. Waterman submitted a Transport Assessment in June 2023 (Report ref: WIE19060.101.R.2.2.4.TA).
- 1.5. Greater London Authority (GLA) Stage 1 response to the development proposals were received on 24<sup>th</sup> August 2023 (Ref: GLA/2023/0441/S1/01). This TN has therefore been produced in response to the transport related comments received from GLA and will address each of the points raised.
- 1.6. This note also addresses the relevant highways related comments received from LBH on 18<sup>th</sup> August 2023 (Ref: 12853/APP/2023/1492).
- 1.7. The issues raised by GLA in the Stage 1 response and by LBH are outlined below in italic text, followed by Waterman's response addressing this issue.

## Document Structure

- 1.8. Following this introduction, the document is structured as follows:
  - Section 2 – Response to GLA Stage 1 Comments.
  - Section 3 – Response to London Borough of Hillingdon Highway Comments.

## 2. Response to GLA Stage 1 Comments

### Access

*'The access arrangements indicated on plan entails the retention of the existing vehicular access points. This does not raise any specific concerns; the swept path analysis provided demonstrates that the existing vehicular access points are suitable for the largest vehicles that will access and leave the site in forward gear. Separate pedestrian access from the car parking areas to the buildings are provided without the need to cross the carriageway.'*

#### Waterman Response

- 2.1. The GLA raises no issue with respect to the access arrangements of the proposed development. Therefore, no further actions are required.

### Healthy Streets, Public Realm and Vision Zero

*'A Healthy Streets Active Travel Zone (ATZ) assessment has been included within the submitted Transport Assessment (TA). A map that details the selected ATZ map routes should be provided. The ATZ has identified areas for improvements to the Healthy Street indicators on all routes, and a contribution towards delivering such improvements would be supported.'*

#### Waterman Response

- 2.2. As requested by the GLA, a map demonstrating the routes that have been assessed within the ATZ assessment has been produced and is included in [Annex A](#).
- 2.3. It should be noted that photos of the walking routes to the key local destinations were appended to the submitted TA and recommendations to improve the worst part of each walking route were included in line with TfL's guidance on Healthy Streets Assessments within Appendix G 'ATZ Neighbourhood Review' of the TA.
- 2.4. The routes assessed within the ATZ assessment and the worst part of each route are set out in [Table 1](#) below:

**Table 1 - Active Travel Zone Walking Routes Assessed**

Route	Worst Section	Healthy Streets Indicators affected
Site to Hewens Primary School	Uxbridge Road Approaching Junction with Hewnes Road	People feel safe People feel relaxed Places to stop and rest Not too noisy
Site to Parkview Surgery	HayesEnd Road adjacent to footway	People feel safe Things to see and do Places to stop and rest
Site to Lilliput Pre-school Hayes	Derwent Drive approaching Lilliput Pre-school Hayes	People feel safe People feel relaxed Places to stop and rest
Site to Co-op Food Store	Frogmore Avenue towards Hayes Park Primary School	People feel safe People feel relaxed Places to stop and rest
Site to Hayes & Harlington Rail Station	Dawson Close – South Walk	People feel safe Shade and shelter Places to stop and rest

- 2.5. As stated within the submitted TA and **Table 1**, the worst sections of each walking route have been assessed. Common Healthy Streets indicators deemed 'not met' are 'people feel safe', 'people feel relaxed' and 'places to stop and rest'.
- 2.6. The TA identifies that there will be a net reduction in overall people trips and walking trips in the AM Peak, PM Peak and throughout the day. Therefore, it is considered that the proposed development will have a negligible impact on pedestrian comfort in the surrounding area.
- 2.7. Deficiencies identified within the ATZ assessment are primarily associated with maintenance requirements on the walking and cycling network (i.e. clearing litter on the footways, fixing 'cracked' sections of footways) which can be addressed through general maintenance of the local highway network by the LPA. This would address the Healthy Streets indicators 'people feel safe' and 'places to stop and rest'. In addition, the green space within the proposed development will be retained which will provide existing and new pedestrians with a 'place to stop and rest'.
- 2.8. The GLA suggestion to provide a contribution towards delivering improvements to the existing walking routes has been considered, however it is considered that funds to address issues within the local area at this scale should be covered under the development's CIL payment.

*'Whilst it is appreciated that the site is within the Green Belt and public transport access is limited, in order to decrease vehicle mode share, the development should capitalise on the opportunity to improve cycle connections to Hayes and Harlington station and Hayes Park. Appropriate contributions towards delivering improvements, informed by the ATZ assessment, to the access to public transport should be secured from this development, in line with Policy T2 and T4.'*

#### *Waterman Response*

- 2.9. As identified within the submitted TA, there are bus stops within 700m, 750m and 1km of the site which provide frequent bus services to a range of local and wider West London destinations including Hayes & Harlington rail station as well as other stations. The TA identifies there are 49 bus services from these stops to Stations in the AM Peak and 42 services from these stops to Stations in the PM Peak. The equates to more than one bus services every other minute towards a station.
- 2.10. Hayes & Harlington rail station is located 3.4km southeast of the site and is therefore accessible by bus and by bicycle. As identified within the ATZ assessment, the worst part of the route towards Hayes & Harlington rail station was identified as the cut-through to Dawson Close/South Walk, 300m to the south of the site access. Access to the Hayes End Bus Stops (Stop XC & XF) has been addressed in route 1 and access to the Adelphi Way Bus Stop and The Brooke House Bus Stops (Stops G & U) have been covered in route 4.
- 2.11. It is noted that the quickest cycle route between the Site and Hayes & Harlington rail station is along Uxbridge Road where there are dedicated cycle lanes, Church Road where the speed limit is 20mph and there are speed calming measures, and Botwell Lane where there are existing cycle lanes on the Botwell Lane/Station Road roundabout. Wayfinding signage would highlight this route and encourage Site users to cycle to Hayes & Harlington rail station.
- 2.12. As set out above, the GLA suggestion to provide a contribution towards delivering improvements to the existing walking and cycling routes has been considered, however it is considered that funds to address issues within the local area at this scale should be covered under the development's CIL payment.

*'Access routes between all disabled parking and main entrances should be revised to be continuous and direct, and it should be ensured that all pedestrian routes within the site will be safe and attractive to use at all times.'*

#### *Waterman Response*

- 2.13. The GLA request to provide direct walking routes between all disabled parking bays and main entrances has been achieved. There is a direct and continuous route between disabled parking bays and the two proposed blocks. The routes are flat and step free. As requested by GLA, a direct and continuous footway will be provided from the three disabled bays at the north of the site to connect to the pedestrian route (P05) towards the central block. A copy of the revised landscape plan is included within Annex B.

## Trip Generation and Highway Impact

*'A multi-modal trip generation assessment has been provided within the Transport Assessment. The trip generation assessment has set out the existing office trip generation to provide net trip information as the car parking spaces have been retained/re-provided. It predicts a reduction in 613 daily car trips; however, the adjusted car trips are predicted to make up 53.1% of the mode share which sits significantly above the strategic mode share target of 25% vehicle trips set out in Policy T1 for outer London boroughs. The sites selected are broadly acceptable except for the Edge of Town Centre site which should be justified. Detailed travel plan measures and enhancements to the active travel environment will be required to encourage modal shift and support a reduction in the number of vehicle trips to this site should be identified.'*

### Waterman Response

- 2.14. As stated within the submitted TA, the mode share for the proposed residential development has been adjusted to reflect the proposed car parking ratio of 1 space per household. The trip generation assessment presents a 'worst case' scenario, assuming all of the parking bays would be used on a daily basis, however it is likely the car driver mode share could be lower as there are sustainable transport options available (bus stops within 700m, 750m and 1km and Hayes & Harlington rail station 3.4km from the Site), which would lead to a greater net reduction in car trips expected from the proposed development.
- 2.15. A comparative multi-modal trip generation assessment has been undertaken which has adjusted the car driver mode share for the proposed development to 25% in-line with the strategic mode share target for vehicle trips in outer London boroughs. The comparative trip generation assessment for the proposed 124 residential units are set out in [Table 2](#) and the net trip generation assessment is set out in [Table 3](#).

**Table 2: Multi-modal trip generation assessment with adjusted car driver mode share**

Mode	Baseline Mode Split	Adjusted Mode Split	08:00-09:00	17:00-18:00	Daily
Underground	6.20%	14.4%	10	8	93
Train	3.20%	7.5%	5	4	49
Bus etc.	12.20%	28.30%	19	16	184
Taxi	0.20%	0.60%	1	1	4
Motorcycle etc.	0.90%	2.00%	1	1	13
Car Driver	67.70%	25.00%	17	14	162
Car Passenger	4.00%	9.20%	6	5	60
Bicycle	1.90%	4.30%	3	3	28
On foot	3.10%	7.20%	5	4	47
Other	0.60%	1.40%	1	1	9
<b>Total</b>	<b>100%</b>	<b>100%</b>	<b>68</b>	<b>57</b>	<b>649</b>

**Table 3: Net trip generation assessment with adjusted car driver mode share**

<b>Mode</b>	<b>08:00-09:00</b>	<b>17:00-18:00</b>	<b>Daily</b>
Underground	5	2	53
Train	1	0	19
Bus etc.	5	0	73
Taxi	1	0	0
Motorcycle etc.	1	1	10
Car Driver	-104	-127	-795
Car Passenger	1	-1	17
Bicycle	1	1	13
On foot	-5	-8	-36
Other	0	0	4
<b>Total</b>	<b>-95</b>	<b>-133</b>	<b>-641</b>

- 2.16. The comparative proposed development would result in a net reduction of 104 car driver trips in the AM Peak, 127 car driver trips in the PM Peak and 795 car driver trips across the day assuming the strategic mode share target for vehicle trips in outer London boroughs of 25% is met.
- 2.17. It should be noted, the 2021 Census 'Method of Travel to Work' dataset has recently been released. The 2021 Census mode share for car drivers is 65.7%, lower than the 67.7% mode share recorded in the 2011 Census, however this remains higher than the 53.1% car driver mode share assessed within the TA. Therefore the trip generation assessment within the TA is considered robust.
- 2.18. The mode share of residents within the proposed development will be defined from the baseline travel survey as part of the Travel Plan, which will be secured via condition.
- 2.19. The residential TRICS sites were selected based on a range of parameters, including PTAL rating (all sites selected have a PTAL rating of 2 and below), all sites are within 'outer London' boroughs (except Tower Hamlets), 2015 and newer and were multi-modal surveys on weekdays.
- 2.20. The 'selected locations' parameter is less relevant in London as the type of location is harder to define in a continuous urban setting and therefore each site was considered and reviewed on their own merit and compatibility with the proposed development. Sites KI-03-C-03 and HO-03-C-05 are identified as 'edge of town centre' and are located in Surbiton and Hounslow respectively. The sites were reviewed on Google and considered to reflect the characteristics of the proposed development with regards to access to local facilities. Nevertheless, it should be noted that only the total person trip rate was derived from the TRICS sites, with the modal splits coming from Census 2011 data which reflects the travel mode for the area surrounding the site.

## Car Parking

*'In line with Policy T6, car-lite development should be the starting point for all outer London developments in London. The proposed development seeks to retain 124 parking spaces. While fewer parking spaces would be encouraged, in order to support a strategic modal shift as outlined in Policy T1, the quantum is in line with minimum standards and would be acceptable. Given the low PTAL, access to car club spaces with electric charging and free/discounted membership may be appropriate to reduce the need for private car use.'*

### Waterman Response

- 2.21. The proposals are providing car parking at a ratio of 1 space per unit, falling below the maximum car parking standards set out in the London Plan 2021 which allows for up to 1.5 spaces per dwelling in Outer London PTAL 0-1 areas. The proposed parking provision therefore exceeds the requirements of the maximum car parking standards which will support the use of sustainable and active modes of transport, while still catering for likely car demand given the Sites PTAL rating of 0 in an Outer London borough. The GLA comment acknowledges that the quantum of car parking proposed is in line with minimum standards and would be acceptable.
- 2.22. The provision of a car club bay, with a fixed period of free/discounted membership for new residents could be considered within the final Travel Plan and secured via condition. Electric charging facilities will be provided in-line with London Plan 2021 requirement and be secured via condition.

*'The quantum of disabled person parking provision at this site should be clarified, as different numbers within the submitted documentation have been provided. In line with London Plan policy, at least 3% of dwellings should be provided with access to a disabled person parking space from the outset, with a Parking Design and Management Plan detailing how a further 7% of dwellings could be provided with access to a disabled person parking space should demand arise. TfL requests that any car parking spaces should be leased and not sold, this should be secured via a permit free agreement.'*

### Waterman Response

- 2.23. The proposed development will provide disabled car parking in-line with the London Plan 2021 requirements, comprising 15 accessible spaces, representing circa 12% of the total parking provision. The proposed provision of disabled parking bays exceeds the minimum requirements of the London Plan policy in this regard.
- 2.24. Parking bays on-site will be leased instead of sold. A commitment to not selling parking bays can be secured via planning condition.

## Cycle Parking

*'The provision of 203 long-stay and 4 short stay is in line with the minimum quantum standards identified within Policy T5 of the London Plan. High quality cycle parking provision should be provided, designed with regard to London Cycle Design Standards (LCDS), which is referred to within Policy T5. Whilst there is some compliance with LCDS, such as the provision of 5% of spaces to accommodate larger cycles, other areas need further thought. TfL supports membership to the Hillingdon Santander cycle hire scheme.'*

#### Waterman Response

- 2.25. The GLA comment acknowledges that the quantum of cycle parking proposed is consistent with London Plan 2021 minimum cycle parking standards.
- 2.26. Cycle parking has been provided in-line with the LCDS guidance where feasible within the constraints of the existing building footprint/structure. Accordance with the LCDS standards is set out below:
  - 5% of the total cycle parking provision has been provided for larger and adapted cycles;
  - additional spaces have been provided as Sheffield stands, exceeding the LCDS standards; and
  - Hayes Park South block provides an aisle width of 3.5m between two-tier racks.
- 2.27. It is acknowledged that the proposed two-tier racks in the Hayes Park Central block provide an aisle width of 2.5m, whereas the LCDS recommends a 3.5m aisle width between adjacent two-tier racks. However as the proposed development is for a 'refurbishment and change of use' of the existing building, it should be noted that a 2.5m aisle width is the maximum deliverable reflecting that the provision of cycle parking is constrained by the existing footprint/structure.
- 2.28. It should be noted that manufacturers guidance for Josta-two-tier cycle racks states that an aisle width of 1.8m is required, which is well below the 3.5m recommendation within the LCDS. The proposed aisle width between two-tier racks in the Hayes Park Central block is 2.5m which exceeds the manufacturers guidance and is considered suitable to allow convenient usage for residents.
- 2.29. Furthermore, a total of 15 cycle parking spaces within the Hayes Park Central block have been provided as Sheffield stands (4 spaces for larger and adapted cycles and 11 spaces on a standard Sheffield stands) and therefore it is considered there is adequate provision for any users who may struggle with an aisle width of 2.5m.
- 2.30. Therefore, the proposed cycle parking provision and layout are considered suitable, and can be secured through condition.

#### Delivery, Servicing and Construction

*'Delivery and servicing will take place onsite in accordance with Policy T7. Some measures to consolidate deliveries have been identified, however further measures to provide opportunities to decarbonize freight should be identified. A management procedure for cycle deliveries should be identified. A full DSP should be secured by condition in accordance with Policy T7.'*

#### Waterman Response

- 2.31. A Delivery and Servicing Management Plan has been submitted alongside the TA. To further decarbonize freight and encourage cycle deliveries, the following measures can be considered further in the Full Delivery and Servicing Management Plan:
  - Promotion of sustainable ordering of deliveries with couriers accredited by the Fleet Operator Recognition Scheme (FORS) to improve operator safety, fuel efficiency and vehicle emissions, through the Travel Information Pack provided to new residents;
  - Promotion of sustainable ordering of deliveries through bicycle couriers within the Travel Information Pack provided to new residents;

- Short stay cycle parking near the block entrances will be provided in-line with the London Plan 2021 standards. Short stay cycle parking allows bicycle couriers to lock up their bike while undertaking a delivery at the site.

2.32. As requested by GLA, a full Delivery and Servicing Management Plan could be secured as a condition which will provide further measures to provide opportunities to decarbonize freight and a management procedure for cycle deliveries.

*'Some measures to improve safety and reduce unnecessary trip movements have been provided to reduce impacts such as FORS Gold membership and CLOCS. In line with Policy T7, details of the proposed construction period should be provided and conditioned within a Construction Logistics Plan (CLP) prepared in accordance with TfL guidance.'*

#### *Waterman Response*

2.33. An Outline Construction Logistics Plan was submitted alongside the TA and identified an indicative construction programme of circa 16-months. A full Construction Logistics Plan will be secured as a condition which will include full details of the proposed construction period as requested by GLA.

### **3. Response to London Borough of Hillingdon Highway Comments**

*The site is situated within the greenbelt and is remote from shops, services, facilities and transport opportunities. The nearest train station is Hayes and Harlington, located 2.5 miles to the south of the site. It is a 520m walk to the nearby bus stop. The site has 2no. vehicular points of vehicular access, from the east via Park Lane and from the west from Hayes End Road. In addition, pedestrians and cyclists would be able to access the site from Park Lane Road and Mead House Lane.*

*Transport for London use a system called PTAL (Public Transport Accessibility Level) to measure access to the public transport network. PTAL assesses walk times to the nearest public transport location taking into account service frequency. The location is then scored between 0 and 6b where 0 is the worst and 6b the best. The site has a PTAL ranking of 0, the worst possible, suggesting that there would be a strong reliance on the private car for trip making.*

#### *Waterman Response*

3.1. It is accepted that the Site is located centrally within Hayes Park, however there are shops, services, facilities, and public transport opportunities within a 10-minute walking distance from the Site which meet resident's day-to-day needs. The CIHT published guidance '*Planning for Walking*' in 2015 setting out a 2km walking catchment for amenities at a district scale, which includes large shops such as superstores. Table 2 within the TA sets out the journey distances to key destinations from the Site and demonstrates that a range of day-to-day facilities are located within 2km of the site, including Co-op Food Store.

3.2. Whilst the TfL WebCAT tool designates the site as having a PTAL rating of 0, the lowest rating, it should be noted that access to public transport across London is generally very good, and that the PTAL score is relative to highly accessible locations within Central London. The walking distance threshold to bus services in a PTAL assessment is 640m. The TA sets out that there are frequent bus services accessible from stops 700m, 750m and 1km from the site which are therefore not considered within the Sites PTAL rating. While services from these stops are not considered within the PTAL assessment, they are nevertheless considered to be readily accessible on foot from the Site.

*'Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The published London Plan 2021 Policy T6.1 Residential Parking requires that development proposals must comply with the relevant parking standards. For a change of use of the buildings from office (Use Class E) to 124no. new homes comprising 25no. x Studios, 40no. x one-bed, 41no. two-bed, 17no. x three-bed and 1no. x four-bed the London Plan would allow a maximum of 186no. car parking spaces. As mentioned above 111no. standard and 13no. disabled persons car parking spaces would be provided, this is in accordance with the London Plan and accepted. All of these car parking spaces should be allocated to a specific unit, Policy T6.1 of the London Plan requires that these car parking spaces are leased and not sold, this requirement should be secured by a planning condition.'*

*Policy T6.1 of the London Plan requires "All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces." The applicant has confirmed that this standard will be provided which again is accepted.*

*The development would provide a total of 203no. long-stay and 4no. short-stay cycle parking spaces, 10no. of these would be Sheffield Stands suitable for adapted bicycles, this standard of provision is in accordance with the London Plan and accepted.*

#### **Waterman Response**

3.3. As acknowledged by the LBH comment, the proposed development will provide compliant levels of car parking in-line with the London Plan 2021 maximum car parking requirements, and standards for disabled parking provision and electric vehicle charging infrastructure.

3.4. Parking bays on-site will be leased instead of sold. A commitment to not selling parking bays can be secured via planning condition.

3.5. The LBH comment also acknowledges that a compliant level of cycle parking is proposed, consistent with the minimum requirements of the London Plan 2021.

To support the proposal the applicant has provided a Transport Assessment. This document provides information upon trip generation with the site in its existing as offices and as the site redeveloped for housing. To determine number of trip rates associated with the site, the applicant has interrogated the TRICS (Trip Rate Information Computer System) database. The sites selected for comparison purposes have been reviewed and are considered representative. The developer reports that the office development would have generated approximately 121no. two-way car driver trips in the AM Peak 08:00 to 09:00h and 957no. movements daily. With the site built out for housing the number of AM Peak two-way car driver movement would fall to 36no. and 345no. daily. Having the site repurposed as a housing use would therefore have a beneficial impact on the highway network.

#### **Waterman Response**

3.6. The LBH comment accepts the trip generation assessment presented in the TA and acknowledges that the proposed development would result in a decrease in two-way vehicle trips and have a beneficial impact on the highway network.

*The Highway Authority has taken the finding of the ATZ and added any interventions that the applicant has overlooked, using the Council's term contractors schedule of rate a budget estimate has been prepared. Set out below of those works considered necessary for the development to function without resulting in transport problems.*

*'The Highway Authority require that the applicant enter a s.106 legal agreement of the 1990 Town and Country Planning Act that commits the developer to delivering the improvements identified. This is a requirement of the published London Plan 2021 Policy T2 Healthy Streets that requires that development proposals should "demonstrate how they will deliver improvements that support the ten Healthy Streets indicators in line with Transport for London guidance". This investment would broaden residents travel choice thereby reducing their reliance on the private car for trip making. If this investment is not provided resident may resort to owning a car and in the absence of parking on-plot they may park injudiciously on-street leading to parking stress, and increased risk to road safety and hindering the free flow of traffic.*

Footpath H6 £35,000.00

Footpath H5 £17,000.00

Scooter and cycles plus equipment Hayes Park School £4,000.00

Cycle Shelter Hayes Park School £8,000.00

Hewens Primary Safe Routes to School £17,000.00

Dropped kerbs and tactile paving 28no. locations £184,800.00

20no. benches £52,000.00

30no. street trees £9,600.00

**TOTAL £327,400.00.**

### Waterman Response

- 3.7. The Applicant refutes the LBH assertion that existing deficiencies within the local pedestrian and cycle environment would lead to residents owning a car and parking on-street leading to an increase in parking stress. LBH states that this could occur due to 'the absence of parking on-plot'. However it is proposed to provide a total of 124 car parking spaces, equating to one parking space per residential unit, which is above the average car ownership for flats in lower output area Hillingdon 018B in the 2021 Census (0.77 cars per flat) whilst remaining below the London Plan 2021 maximum parking standards (1.5 spaces per unit). Therefore, the proposed development is not expected to generate additional parking stress in the surrounding area, notwithstanding any perceived existing deficiencies within the local pedestrian and cycle environment.
- 3.8. As stated earlier, there will be a net reduction in overall people trips and walking trips in the AM Peak, PM Peak and throughout the day associated with the proposed development and change from office to residential land use. Therefore, the proposed development will have a negligible impact on pedestrian comfort levels in the surrounding area.
- 3.9. Deficiencies identified within the ATZ assessment are primarily associated with maintenance requirements on the walking and cycling network (i.e. clearing litter on the footways, fixing 'cracked' sections of footways) which can be addressed through general maintenance of the local highway network by the LPA. LBH's suggestion to provide a contribution towards delivering improvements to the existing walking routes has been considered, however it is considered that funds to address issues within the local area at this scale should be covered under the development's CIL payment.
- 3.10. The Applicant considers the LBH request for a contribution of £327,400.00 via a S106 agreement towards the improvement of the pedestrian and cycle environment along the routes assessed within the ATZ to be excessive and unreasonable.
- 3.11. Government guidance on planning obligations states that:

*Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms. They must be:*

- *necessary to make the development acceptable in planning terms;*
- *directly related to the development; and*
- *fairly and reasonably related in scale and kind to the development.*

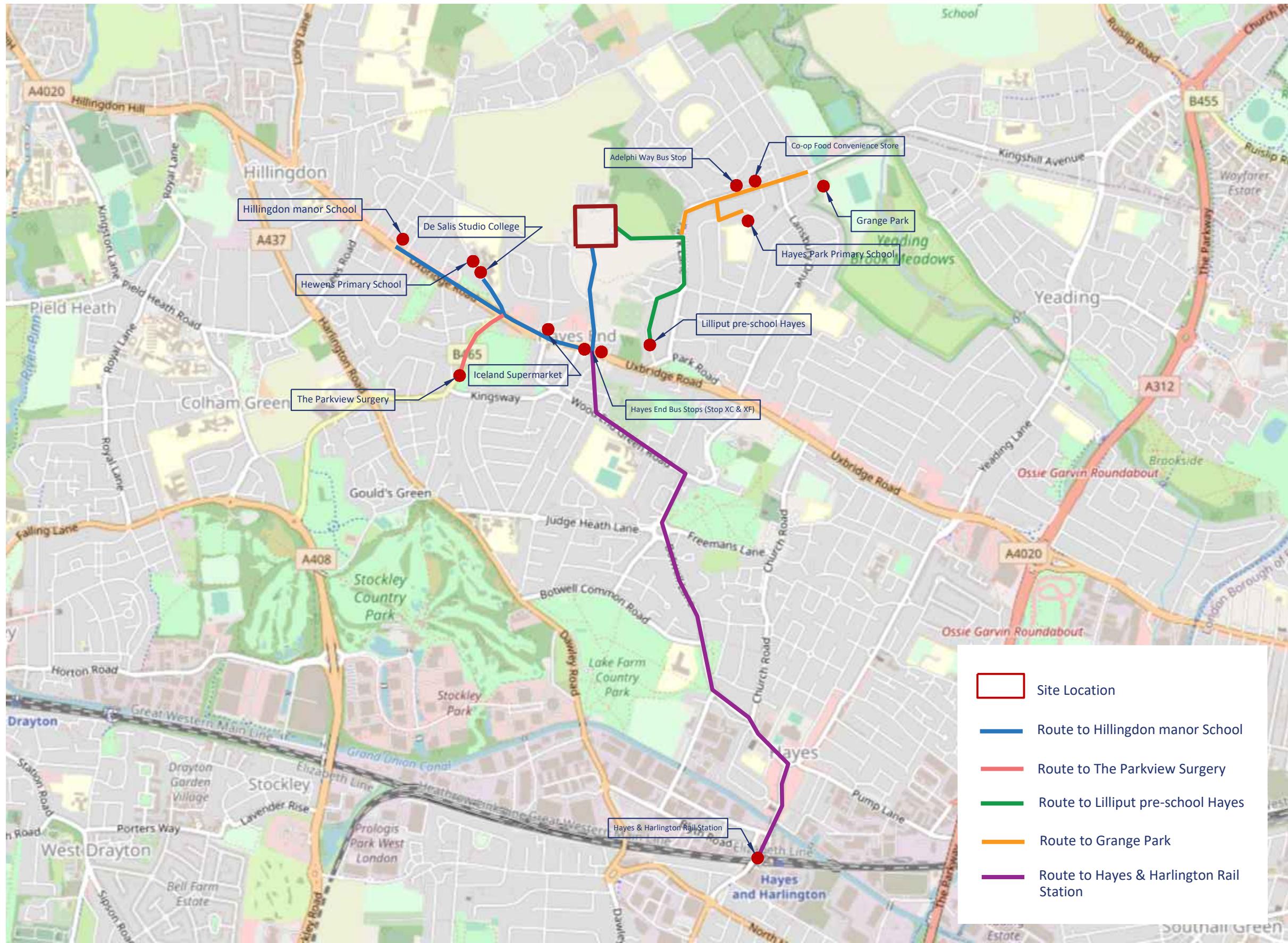
- 3.12. The contribution request of £327,400.00 has been considered against the criteria set out by National guidance as follows:
  - **Necessary to make the development acceptable in planning terms** – This contribution is not considered necessary to make the development acceptable in planning terms. LBH have accepted the results of the trip generation assessment within the TA, which identifies that the proposed development would lead to a net-reduction in walking trips and negligible increases in cycling trips in the surrounding area compared to the existing baseline. A contribution to the surrounding walking and cycling environment is not considered necessary to facilitate access from the Site to the surrounding area, and the assertion from LBH that perceived deficiencies in the walking and cycling environment on the ATZ routes assessed would lead to over-spill parking and parking stress due to 'the absence of on-plot parking' is refuted.

- ***Directly related to the development*** – LBH have provided a list of requested interventions, which includes up to 20 benches, 30 street trees and dropped kerbs and tactile paving in 28 locations. No details have been provided as to where these would be located or if they can be feasibly installed. The contribution sought by LBH are for improvements along the full routes assessed within the ATZ assessment, which includes Hewens Primary School (1.1km from the Site), Parkview Surgery (1.2km from the Site), Lilliput Pre-School Hayes (800m from the Site), Co-op Food Store (750m from the Site) and Hayes and Harlington rail station (3.4km from the Site) which total 7.25km of walking and cycling routes. It is considered that contributions across an area this large cannot be justified as directly relating to the proposed development. Part of the contribution request is for unspecified improvements to footpath H6 which borders the Site to the south and footpath H5 which is a cut-through on Pillions Lane. Neither footpath was assessed within the ATZ assessment as key walking routes and given the projected decrease in total walking trips arising from the proposed development, contributions to footpath H5 and H6 are not considered to directly relate to the proposed development. The proposed developments net trip generation sets out a net increase of one bicycle trip throughout the day and given the proximity of the Site to Hayes Park School (1.2km) it is considered unlikely any significant volume of Site occupants would cycle to Hayes Park School and therefore contributions towards cycle facilities at the school are not considered to directly relate to the Site. Details of the Hewens Primary Safe Routes to School improvement have not been provided however Route 1, which assessed the route to Hewens Primary School, identified improvements to the worst part of the route (Uxbridge Road approaching the junction with Hewens Road) which relate to existing highway maintenance issues.
- ***Fairly and reasonably related in scale and kind to the development*** – Suggested improvements within the ATZ assessment were only identified at the ‘worst part’ of each route in-line with TfL Healthy Streets Guidance, and the deficiencies identified are primarily associated with maintenance requirements on the walking and cycling network (i.e. clearing litter on the footways, fixing ‘cracked’ sections of footways) which should be addressed through general maintenance of the local highway network. It is considered that funds to address issues within the local area at this scale should be covered under the development’s CIL payment. Therefore, the contributions requested by LBH via a S106 agreement are not considered to be fairly and reasonably related in scale and kind to the development.

3.13. Based on the above assessment, it is considered that the LBH request for contribution towards the surrounding pedestrian and cycle environment through a S106 agreement is not considered to be in accordance with government guidelines on planning obligations and are therefore refuted as it does not meet the planning tests of being necessary, directly related, and proportionate to the proposed development. It is considered that funds to address issues within the local area at this scale should be covered under the development’s CIL payment.

## A. ATZ Walking Route Map

# ATZ Map – Assessed Walking Routes



01	21.09.23	ISSUED	DA	JH
Rev	Date	Description	By	Chk

Amendments

Project

## Hayes Park

Title

## ATZ Map - Assessed Walking Routes

Client

Shall Do Hayes Developments Ltd

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WIP

Designed By	DA	Director	AB	Waterman Ref
Drawn By	DA	Date	21.09.2023	Scales @ A3

Scale

Project - Originator - Volume - Level - Type - Role - Number

Revision

P01

File Path N:\Projects\WIE-19060\1007\_CAD95\_Transport\ATZ Map

## **B. Revised Landscape Plan**



#### General Notes

#### Notes

No implied licence exists. This drawing should not be used to calculate areas for the purposes of valuation or taxation.

Do not scale this drawing for construction purposes. All dimensions to be checked on site by the contractor and such dimensions to be kept separate from the contractor's drawings.

All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

#### Key Plan

For Planning

Project No.	0419
Project Name	Hayes Park

Scale @A1  
1:500

Line of Posts

Drawing Title

Landscape Masterplan

Client	Shall Do Hayes Developments Limited
Date	12/05/2023
Drawn by	ML
Checked by	SEW

P2	22/09/22	Planning Update	SEW
P1	12/05/22	For Planning	SEW

Drawing Number	Rev
0419-SEW-ZZ-DR-L-001000	P2