

**C & L COUNTRY CLUB, WEST END LANE, HAYES,
NORTHOLT UB5 6RD**

TEMPORARY USED OF SITE FOR CAR SALES

LONDON BOROUGH OF HILLINGDON



TRANSPORT ASSESSMENT

JANUARY 2024

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**PROPOSED TEMPORARY CAR SALES USE OF C & L COUNTRY CLUB, WEST
END LANE, HAYES, NORTHOLT**

TRANSPORT ASSESSMENT

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1.0 INTRODUCTION AND BACKGROUND

- 1.1 It is understood that the Council are currently investigating an unlawful use of C & L Country Club, West End Lane and have indicated that they will be looking to serve an enforcement notice if a Planning Application is not submitted shortly. As such this Transport Assessment has been prepared to support a Planning Application for temporary permission for a period of 24 months for use of part of the site for the sale of cars (sui generis). The current lawful use of the site is D1/D2 (under the old use class) with an extant floorspace of around 3,200 sq.m. The site was last used as a function room/ leisure type activities about 2-3 years ago.
- 1.2 The area being used for car sales has capacity for about 150 cars for sale and there are generally 3 to 5 staff on-site. The operation has been in place since September 2022. The site is used 10:00 – 19:00 Monday to Saturday and 11:00 – 16:00 on Sundays, with no deliveries or servicing taking place outside these hours. Cars for sale are driven in individually with no large lorries/transporters being used.
- 1.3 This report provides the necessary information to demonstrate that the proposed development is an appropriate development from a highway, traffic and transportation perspective.

2.0 POLICY CONSIDERATIONS

- 2.1 In considering this planning application and the associated transport issues, it is useful to consider some of the key planning issues.

National Planning Policy Framework (NPPF) December 2023

- 2.2 At paragraph 11 of the NPPF the Framework states:

Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a) *all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area;*
or

- ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

For decision-taking this means:

- c) *approving development proposals that accord with an up-to-date development plan without delay; or*
- d) *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁸, granting permission unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

2.3 In terms of parking standards, paragraph 112 states:

Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.

2.4 In terms of highways and traffic, paragraph 114 states:

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that

- a) *appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) *safe and suitable access to the site can be achieved for all users;*
- c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
- d) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree*

2.5 Paragraph 115 of the NPPF states:

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe

2.6 Paragraph 116 of the NPPF states:

Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*

2.7 Paragraph 117 of the NPPF states:

All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

The London Plan 2021

2.8 The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. The Plan is part of the statutory development plan for London, meaning that the policies in the Plan should inform decisions on planning applications across the capital. Borough's Local Plans must be in 'general conformity' with the London Plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably, which the London Plan sets out.

2.9 Policy T5 Cycling of the London Plan state:

- A Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through:
 - 1) supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure

- 2) securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.3, ensuring that a minimum of two short stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision.
- B Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.
 - C Development Plans requiring more generous provision of cycle parking based on local evidence will be supported.
 - D Where it is not possible to provide suitable short-stay cycle parking off the public highway, the borough should work with stakeholders to identify an appropriate on-street location for the required provision. This may mean the reallocation of space from other uses such as on-street car parking. Alternatively, in town centres, adding the required provision to general town centre cycle parking is also acceptable. In such cases, a commuted sum should be paid to the local authority to secure provision.
 - E Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards. These may include options such as providing spaces in secure, conveniently-located, on-street parking facilities such as bicycle hangers.
 - F Where the use class of a development is not fixed at the point of application, the highest potential applicable cycle parking standard should be applied.

2.10 Policy T6 Car parking of the London Plan includes:

- A *Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.*
- B *Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy.*
- D *The maximum car parking standards set out in Policy T6 .1 Residential parking to Policy T6 .5 Non-residential disabled persons parking should be applied to development proposals and used to set local standards within Development Plans.*
- E *Appropriate disabled persons parking for Blue Badge holders should be provided as set out in Policy T6 .1 Residential parking to Policy T6 .5 Non residential disabled persons parking.*
- I *Adequate provision should be made for efficient deliveries and servicing and emergency access.*

Local Policies

- 2.11 Local Policies are set out in London Borough of Hillingdon Local Plan Part 2 Development Management Policies Adopted Version 16 January 2020 and include:

Policy DMT 1: Managing Transport Impacts A) Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

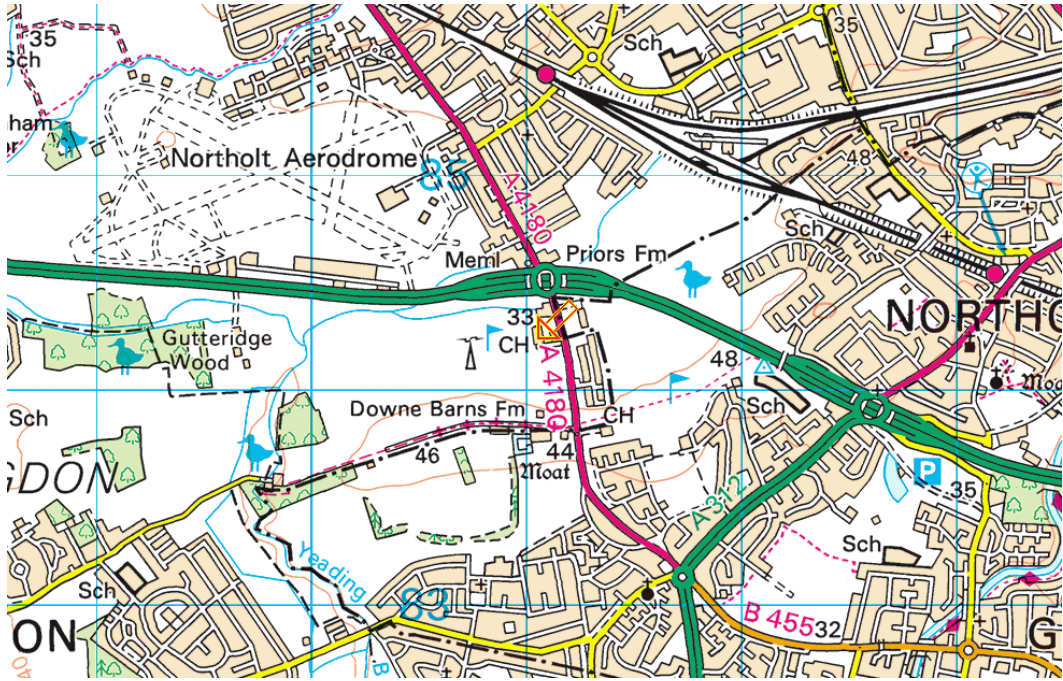
Policy DMT 2: Highways Impacts Development proposals must ensure that: i) safe and efficient vehicular access to the highway network is provided to the Council's standards; ii) they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents; iii) safe, secure and convenient access and facilities for cyclists and pedestrian are satisfactorily accommodated in the design of highway and traffic management schemes; iv) impacts on local amenity and congestion are minimised by routing through traffic by the most direct means to the strategic road network, avoiding local distributor and access roads; and v) there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads, including along roads or through junctions which are at capacity.

Policy DMT 5: Pedestrians and Cyclists A) Development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network

Policy DMT 6: Vehicle Parking A) Development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity.

3.0 BASELINE CONDITIONS

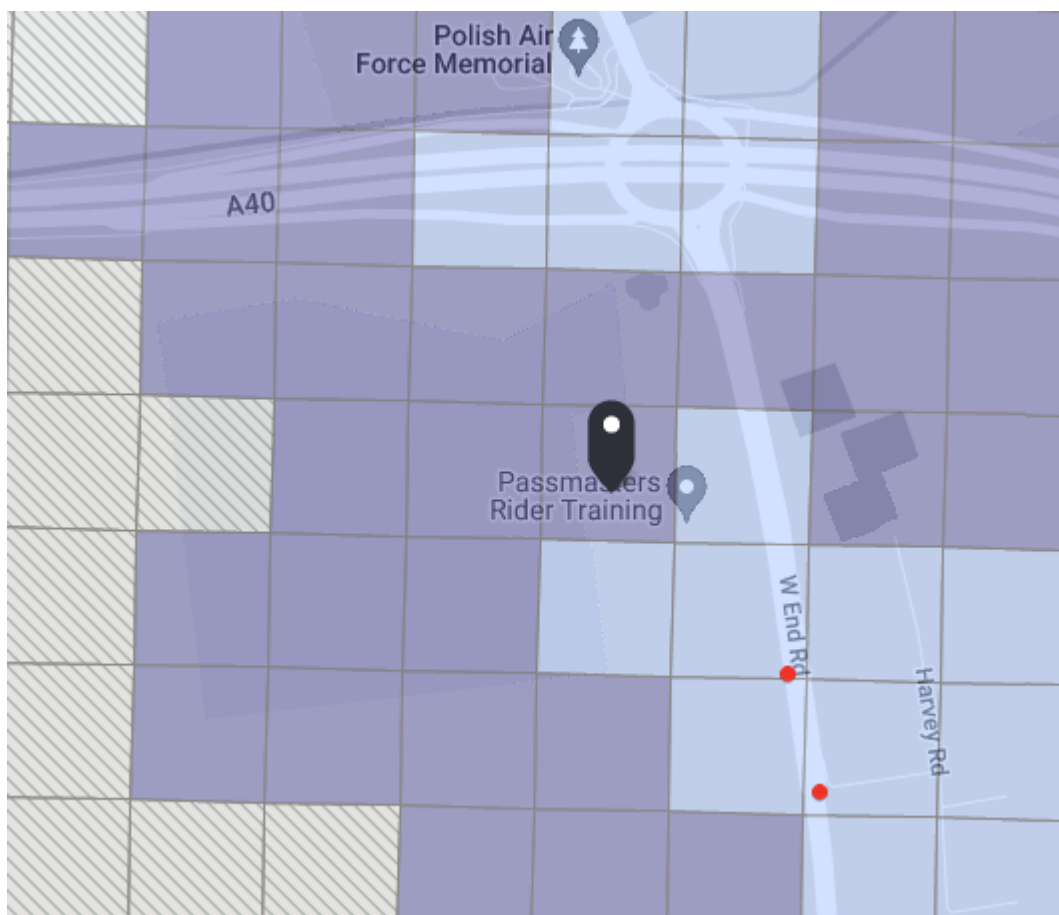
- 3.1 C & L Country Club is located on West End Lane (A4180) close to its junction with Western Avenue (A40) at the Polish Air Force Memorial Roundabout. The A40 forms part of the Strategic Road Network and provides good connections to the wider strategic network including the M25 and M40. The local Highway Authority is the London Borough of Hillingdon, though Transport for London are the Highway Authority for both West End Lane (A4180) and Western Avenue (A40). The plan below shows the surrounding road network.



- 3.2 West End Lane is subject to a 40 mph speed limit at the entrance to the C & L Country Club. The street lighting in the vicinity is good. There are pedestrian crossing facilities with central islands fairly close to the entrance of the C & L Country Club (on both sides) which allow pedestrians to cross the A4180. Stopping is prohibited on the A4180 due to the Red Route controls. There are hatched markings in the centre of the road which help vehicles to turn right safely into the site.



- 3.3 The Public Transport Accessibility of the site is poor (PTAL 1B) as shown below.



3.4 The site is not served well by bus services though Routes E7 and 696 pass in front of the site and with bus stops located around 100-200m south of the entrance to the C & L Country Club. The nearest station is South Ruislip which is just under a mile from the site.

3.5 There is an off-road cycle path directly outside the entrance of C & L Country Club that runs adjacent to the A4180. Details of local cycle facilities can be found in the Transport for London Local Cycling Guide 6.

4.0 **TRIP GENERATIONS AND MODAL SHARE**

4.1 TRICS Bureau Service were approached for data relating to the extant D1/D2 permission and for the proposed temporary use as used car sales at this specific location. It was suggested that the TRICS Leisure Centre would be appropriate, and it was confirmed they had no car sales data available. As such the TRICS data for Leisure Centres has been used to quantify the trip generation from the extant D1/D2 use. Traffic counts have been undertaken to obtain the actual trip generation of the used car sales operation.

4.2 The TRICS data proposed by the TRICS Bureau Service was to use a GFA parameter of between 360m² (the lowest possible) and 8000m² and to use edge of town for location.

This resulted in 7 sites (8 survey days) for the assessment. The tables below show the sites used and the vehicle trip generation from the TRICS Bureau Service.

LIST OF SITES relevant to selection parameters

1	CA-07-C-02 BACK LANE CAMBOURNE	LEISURE CENTRE		CAMBRIDGESHIRE
	Edge of Town Residential Zone Total Gross floor area:		1502 sqm	
	Survey date: THURSDAY		07/06/18	Survey Type: MANUAL
2	EX-07-C-01 CREST AVENUE BASILDON	LEISURE CENTRE		ESSEX
	Edge of Town Residential Zone Total Gross floor area:		3364 sqm	
	Survey date: THURSDAY		30/09/21	Survey Type: MANUAL
3	EX-07-C-02 PRIORY CHASE RAYLEIGH	LEISURE CENTRE		ESSEX
	Edge of Town No Sub Category Total Gross floor area:		3297 sqm	
	Survey date: TUESDAY		28/09/21	Survey Type: MANUAL
4	LT-07-C-02 ATTIFINLAY CARRICK-ON-SHANNON SUMMERHILL	LEISURE CENTRE		LEITRIM
	Edge of Town Residential Zone Total Gross floor area:		2597 sqm	
	Survey date: SATURDAY		20/05/17	Survey Type: MANUAL
5	NY-07-C-02 GARGRAVE ROAD SKIPTON	LEISURE CENTRE		NORTH YORKSHIRE
	Edge of Town Out of Town Total Gross floor area:		2530 sqm	
	Survey date: SATURDAY		09/03/19	Survey Type: MANUAL
6	NY-07-C-03 GARGRAVE ROAD SKIPTON	LEISURE CENTRE		NORTH YORKSHIRE
	Edge of Town Out of Town Total Gross floor area:		2530 sqm	
	Survey date: SATURDAY		21/05/22	Survey Type: MANUAL
7	TI-07-C-02 DUBLIN ROAD NENAGH	LEISURE CENTRE		TIPPERARY
	Edge of Town No Sub Category Total Gross floor area:		2980 sqm	
	Survey date: THURSDAY		26/05/16	Survey Type: MANUAL
8	WM-07-C-02 BEECHES ROAD BIRMINGHAM	LEISURE CENTRE		WEST MIDLANDS
	Edge of Town Residential Zone Total Gross floor area:		2600 sqm	
	Survey date: THURSDAY		26/09/19	Survey Type: MANUAL

TRIP RATE for Land Use 07 - LEISURE/C - LEISURE CENTRE

TOTAL VEHICLES

Calculation factor: 100 sqm

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00	3	2854	0.164	3	2854	0.023	3	2854	0.187
07:00 - 08:00	6	2723	0.581	6	2723	0.257	6	2723	0.838
08:00 - 09:00	8	2675	1.182	8	2675	0.486	8	2675	1.668
09:00 - 10:00	8	2675	1.430	8	2675	1.252	8	2675	2.682
10:00 - 11:00	8	2675	1.290	8	2675	1.453	8	2675	2.743
11:00 - 12:00	8	2675	1.383	8	2675	1.393	8	2675	2.776
12:00 - 13:00	8	2675	1.079	8	2675	1.262	8	2675	2.341
13:00 - 14:00	8	2675	1.168	8	2675	1.070	8	2675	2.238
14:00 - 15:00	8	2675	1.070	8	2675	1.061	8	2675	2.131
15:00 - 16:00	8	2675	1.234	8	2675	1.159	8	2675	2.393
16:00 - 17:00	8	2675	0.893	8	2675	1.000	8	2675	1.893
17:00 - 18:00	6	2723	0.875	6	2723	1.089	6	2723	1.964
18:00 - 19:00	6	2723	0.906	6	2723	1.010	6	2723	1.916
19:00 - 20:00	6	2723	0.539	6	2723	0.643	6	2723	1.182
20:00 - 21:00	6	2723	0.306	6	2723	0.606	6	2723	0.912
21:00 - 22:00	4	2885	0.113	4	2885	0.381	4	2885	0.494
22:00 - 23:00	2	2790	0.090	2	2790	0.233	2	2790	0.323
23:00 - 24:00									
Total Rates:			14.303				14.378	28.681	

4.3 Using the above trip generations, the extant permission would generate 918 one-way vehicle trips per day, with a peak hour (11.00-12.00 hours) generation of 89 one-way vehicle trips. It is accepted that different locations could have been chosen and could have resulted in higher or lower trip generations.

4.4 Traffic surveys were carried out at the existing site on Wednesday 16th, Saturday 20th and Sunday 21st January 2024 to record the vehicle movements into and out of the site in order to assess the traffic generation of the car sales use. The traffic data has been attached as Appendix A. It can be seen that the traffic generation was extremely low on all three days, with a maximum daily trip generation of 26 one-way vehicular trips or around one trip every 30 minutes. It is acknowledged that this trip rate could be higher on other days but these surveys do show the very low traffic generation of the car sales use both in actual numbers and in comparison to the TRICS data for the extant use (26 one-way vehicle trips compared to 918 one-way vehicle trips per day).

5.0 IMPACTS

Road Networks

5.1 The traffic surveys show that there would be a maximum daily trip generation of 26 vehicular trips or around one trip every 30 minutes compared to 918 one-way vehicles trips based on the TRICS data for the extant use. There would therefore be a net reduction in vehicular trips and an associated improvement on the road network. The 26 daily vehicular trips would not have a measurable impact on the road network.

Cycle Routes

- 5.2 The car sales use will generate little or no cycle movements and will have no impact on the surrounding cycle network.

Pedestrians Routes

- 5.3 The car sales use will generate little or no pedestrian movements and will have no impact on the surrounding pedestrian network.

Public Transport Networks

- 5.4 The car sales use will generate little or no public transport movements and will have no impact on the public transport network.

6.0 CONCLUSIONS

- 6.1 This Transport Assessment has been prepared to support a Planning Application for temporary permission for a period of 24 months for use of part of the site for the sale of cars (sui generis). The current lawful use of the site is D1/D2 (under the old use class) with an extant floorspace of around 3,200 sq.m. The site was last used as a function room/ leisure type activities about 2-3 years ago. Cars for sale are driven in individually with no large lorries/transporters being used.
- 6.2 C & L Country Club is located on West End Lane (A4180) close to its junction with Western Avenue (A40) at the Polish Air Force Memorial Roundabout. The A40 forms part of the Strategic Road Network and provides good connections to the wider strategic network including the M25 and M40. There are pedestrian crossing facilities with central islands fairly close to the entrance which allow pedestrians to cross the A4180. There are hatched markings in the centre of the road which help vehicles to turn right safely into the site. The Public Transport Accessibility of the site is poor (PTAL 1B). There is an off-road cycle path directly outside the entrance of C & L Country Club that runs adjacent to the A4180.
- 6.3 TRICS Bureau Service were approached for data for relating to the extant D1/D2 permission and for the proposed temporary use as used car sales at this specific location. It was suggested that the TRICS Leisure Centre would be appropriate, and it was confirmed they had no car sales data available.
- 6.4 The TRICS data indicated that the extant permission would generate 918 one-way vehicle trips per day, with a peak hour (11.00-12.00 hours) generation of 89 vehicle trips.
- 6.5 Traffic surveys showed that the traffic generation for car sales was extremely low with a maximum daily trip generation of 26 vehicular trips or around one trip every 30 minutes and substantially lower than the extant permission (26 one-way trips compared to 918 one-way vehicle trips).

- 6.6 The proposals therefore comply with the local policy requirements in the London Borough of Hillingdon Local Plan Part 2 Development Management Policies Adopted Version 16 January 2020 : Policy DMT 1, Policy DMT 2, Policy DMT 5 and Policy DMT 6.
- 6.7 Paragraph 115 of the NPPF states: *‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’*. Paragraph 11 of the NPPF states that planning permission should be granted unless **‘any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole’**. Clearly this is not the case in respect to the proposed development.

Appendix A

Wednesday 16th January 2024			
MAKE	MODEL	TIME IN	TIME OUT
Ford	FIESTA	09.58am	
HYUNDAI	I10	10.00am	
VAUXHALL	CORSA		10.12am
VAUXHALL	MERIVA		10.12am
AUDI	Q2	10.14am	
VAUXHALL	MOKKA	10.37am	
VOLKSWAGEN	POLO	10.38am	
VAUXHALL	ASTRA	11.04am	11.12am
NISSAN	JUKE	12.15pm	12.36pm
VAUXHALL	ADAM		12.58pm
MERCEDES	SPRINTER	1.26pm	1.41pm
PORSCHE	PANAMERA	3.57pm	4.26pm
HONDA	CIVIC		5.27pm
FORD	FOCUS	6.02pm	6.36pm
BMW	3 SERIES	6.35pm	6.41pm
AUDI	Q2		6.59pm
FORD	FOCUS		6.59pm
VAUXHALL	CORSA		6.59pm
One-way Trips		11	13

Saturday 20th January 2024			
MAKE	MODEL	TIME IN	TIME OUT
AUDI	Q2	9.59am	
VAUXHALL	CORSA	10.00am	
FORD	FOCUS	10.00am	
MAZDA	3		11.02am
FORD	FIESTA	11.36am	
TOYOTA	PRIUS	11.52am	12.24pm
AUDI	A3	12.11pm	1.37pm

VOLKSWAGEN	UP	12.58pm	1.28pm
FORD	FIESTA	2.26pm	3.16pm
HYUNDAI	I30		2.57pm
BMW	X5	3.11pm	4.02pm
SEAT	IBIZA	3.24pm	
HONDA	CIVIC	4.36am	5.11pm
VAUXHALL	INSIGNIA	5.13pm	5.46pm
VOLKSWAGEN	GOLF	5.48pm	6.24pm
VOLKSWAGEN	POLO		6.59pm
VAUXHALL	CORSA		6.59pm
AUDI	Q2		6.59pm
One-way Trips		13	13

Sunday 21st January 2024			
MAKE	MODEL	TIME IN	TIME OUT
VAUXHALL	CORSA	10.59am	
VOLKSWAGEN	POLO	11.02am	
HONDA	JAZZ	11.47am	12.29pm
HYUNDAI	IX35	12.07pm	12.53pm
AUDI	A5	1.42pm	1.57pm
FORD	FIESTA	2.21PM	2.46pm
VAUXHALL	ASTRA		2.25pm
VAUXHALL	ASTRA	2.42pm	
TESLA	MODEL 3	3.45pm	3.53pm
TESLA	MODEL 3	3.45pm	3.53pm
VOLKSWAGEN	POLO		4.00pm
DACIA	DUSTER		4.00pm
One-way trips		9	9