

Transport Assessment

Rainbow Industrial Estate, Trout Road, Yiewsley

Prepared for Troutbourne LLP

By YES Engineering Group Limited

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Revision History

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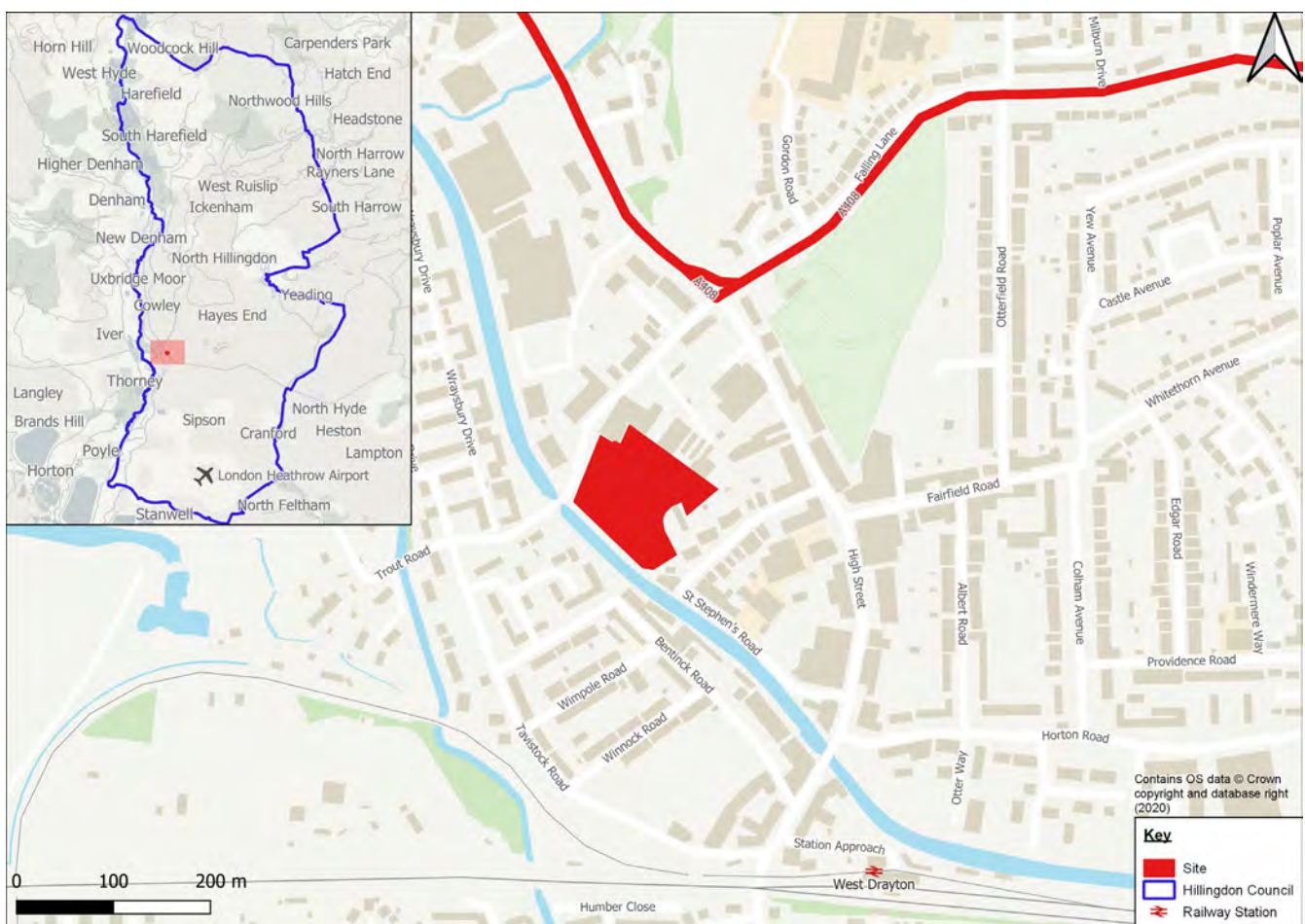
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1 Introduction

YES Engineering Group is instructed by Troutbourne LLP to prepare a Transport Assessment (TA) in support of a temporary planning application for Retention of two portacabins and entrance gates onto Trout Road and use of site for sui generis uses including container storage; open and closed storage of building, scaffolding and aggregate materials; vehicle storage and sales; and other commercial uses on land at Rainbow Industrial Estate, Trout Road, West Drayton, UB7 7XT ('The Site').

Figure 1.1 shows the site is bound by Trout Road to the north; an industrial area to the east (part of the Kirby Industrial Estate currently still in use) and St Stephen's Road to the South. The Grand Union Canal lies directly west of the site, flowing in a north-south direction.

Figure 1.1 – Location Plan



The site lies within the administrative area of the London Borough of Hillingdon (LBH) and the Greater London Authority (GLA).

The site is also located within the wider Rainbow and Kirby Industrial Estates site which extends to 2.15 hectares on an irregularly shaped plot. Parts of the site front the south east side of Trout Road, the western side of Yiewsley High Street, and the north west side of St Stephen's Road, with the entire south west boundary bordered by the Grand Union Canal.

Access to this wider site can be made via the High Street, Trout Road, and St Stephen's Road.

The Rainbow and Kirby Industrial Estate site previously accommodated a range of single-storey and two-storey industrial and commercial buildings with the former office building fronting the High Street falling within the Secondary Shopping Area of Yiewsley/West Drayton Town Centre and the remainder of the site falling within the Trout Road Industrial and Business Area.

The Rainbow Industrial Estate part of the application site is cleared of buildings and is currently in use for parking whilst the Kirby Industrial site remains in commercial use and includes a number of car garage and repair centres.

1.1 Development Proposals

The development proposals are for the retention of two portacabins and entrance gates onto Trout Road and use of site for sui generis uses including container storage; open and closed storage of building, scaffolding and aggregate materials; vehicle storage and sales; and other commercial uses.

Prior to the COVID pandemic the site was leased to 'Drivefly' who used the site to operate airport related meet and greet valet car parking. Drivefly also provide hotel overflow parking. Two Portacabins are located on the Site which were used as offices and as a waiting room for customers. Hardstanding erected as part of previous airport parking use. The rest of the site is unsurfaced.

The two portacabins previously used as offices and a waiting room for park and ride customers associated with the previous airport parking are centrally located off the hardstanding area off the Trout Road entrance.

One cabin used for site security including 1 x security staff and includes CCTV control and screens for surveillance of the site. This security cabin is also linked to an intercom by the Trout Road gates to manage access into the site for visitors. Second cabin used for ancillary tenant offices and includes a toilet for all staff on the site.

Container storage is in a flexible location depending on tenant requirements, 7 containers currently located around site perimeter on Trout Road part of the site and to the rear by Grand Union Canal. The maximum number of containers on site would be 30.

Open and closed storage of building, scaffolding and aggregate materials are also flexibly located to meet tenant requirements. The building and scaffolding materials uses proposed are more centrally located in the site to rear of existing commercial uses to limit any impact on residential amenities. Materials are stored on metal / wireframe racks.

Aggregate materials are stored on-site, however no mixing occurs on site. Mixing happens on vehicles at the location where the materials are required. This land use is located to rear of the site by Grand Union canal to minimise impacts on residential amenities.

Vehicle storage and sales are located on existing hardstanding area by the site entrance on Trout Road.

Hours of use sought:

- 7am-7pm - Weekdays
- 7am - 1pm - Saturdays

The number of staff expected across the site is approximately 20-30, but as the proposed land uses are mainly storage it is not expected that all staff will be on site all day, every day.

As set out in Section 1.2 below the Site has extant planning permission (Application no. 38058/APP/2013/1756) for the erection of 99 residential units (C3), 50 unit extra care/dementia sheltered housing scheme (C3), 1,529.4sq.m light industrial floorspace comprising 17 business units (B1c) and 611. 30sq.m of restaurant/cafe (A3) floorspace, associated open space, car parking and landscaping. Additionally, the site has recently been used for airport parking. It is demonstrated in Section 3 of this report that the temporary sui generis uses will generate fewer vehicular movements than the existing extant permission or airport parking use.

Access

The main vehicular access to the site is via Trout Road which is approximately 50m north east of the Grand Union Canal. All vehicles are able to enter and exit the site in a forward gear.

A secondary emergency exit is located from St Stephen's Road.

This arrangement is consistent with the previous airport parking use.

Parking

Parking is provided in unmarked bays across the site and sufficient space will be provided in accordance with the London Plan.

As stated above the site was previously operating as a temporary car park for users of Heathrow Airport and nearby hotels. The temporary car park provides around 500 (unmarked) car parking spaces.

Cycle parking will be provided for each use in accordance with the London Plan.

Servicing

All servicing movements occur from Trout Road and allows all service vehicles to enter and leave in a forward gear.

1.2 Relevant Planning History

Airport Parking - 2017 Enforcement Notice Appeal Decision

An Enforcement Notice (ref: 3E04/VA/10341) was issued on 16/10/2016 on the application site for alleged breaching of planning control 'Without planning permission the use of the Land for car parking (Sui generis Use Class on Land at Rainbow Industrial Estate, Trout Road, West Drayton UB7 7XT' ('the breach')). The requirements of the Notice were:

- cease the use of the Land for car parking;
- cease the use of the mobile cabin in connection with the use of the Land for car parking and remove same structure from the Land;
- remove from the Land all vehicles and all fixtures and fittings that facilitate the use of the Land for car parking.

An appeal against the Enforcement Notice was made in November 2016 and an appeal decision was issued on 8th June 2017 (PINS Refs: APP/R5510/C/16/3163200 and APP/R5510/C/16/3163365) which allowed use of the land for car parking for 12 months from the date of date decision i.e. from 8th June 2017 until 8th June 2018.

In considering highways impacts of the proposals the Inspector agreed that it was appropriate to make comparison to permitted development under the 2014 Outline Permission for mixed use development on the wider Rainbow and Kirby Industrial Estate site (set out below). He went on to consider transport issues at paragraphs 3, 17, 18, 19, 20 and 21;

3. *'The access from St Stephen's Road shall be provided with those parts of 2.4m x 2.4m pedestrian visibility splays which can be accommodated within the site in both directions and shall be maintained free of all obstacles to the visibility between heights of 0.6m and 2.0m above the level of the adjoining highway.'*

17. *'Simple maths determines that the maximum level of daily movements is only 20 % of those permitted and the number of vehicular movements is noticeably less in the morning and evening peaks. Thus, even making some allowance for the activities that still operate from the buildings within the residual 0.9 ha, it is clear the level of vehicular movements is significantly less than that likely to be generated by the permitted use.*

18. *In light of the above, whilst the Council might be technically correct to suggest that the unauthorised use has resulted in an increase in vehicular movements when compared to a nil use, following the demolition of the buildings, the level of increase appears to be well below that which the Council has permitted. In that context the Council has not explained why this level of increase would result in traffic congestion in the local area. The PBA Technical Note says junction capacity assessments conducted at 5 nearby junctions indicate that they operate efficiently and within practical capacity in all scenarios. The Council has provided no evidence to dispute this. So, whilst I acknowledge that the parking associated with the permitted scheme is designed to serve the mixed-use development, that does not alter my conclusion that the level of movements is less than that which the Council has previously found to be acceptable, such that it would not compromise the operation of the network.*

19. *In the circumstances I find no conflict with UDP Policy AM2 because the level of traffic generation and impact on the highway network is less than that which the Council has already permitted. I also find compliance with UDP Policy AM7 because the level of traffic generation is acceptable, and the activity would not unacceptably increase the use of junctions at or near capacity, or prejudice the free flow of traffic or conditions of highway or pedestrian safety. With regard to the latter I note that the Council has put forward a suggested condition to deal with pedestrian visibility, which the Appellant in Appeal B has accepted.'*

20. *'With regard to LP Policies 6.1, 6.6 and 6.13, my starting point is that no conflict was alleged with these policies on the face of the notice. Paragraph 2.24 of the Council's statement appears to draw out the salient point to be that they seek to encourage development that is less reliant on access by private cars; I agree. However, I find no basis to conclude that these policies preclude the provision of car parking on a temporary basis as is now proposed. Pending completion of works to the Elizabeth Line and the consequential improvements to train services to Heathrow, these policies provide no basis to support a zero-tolerance approach to off-airport parking. Whilst the Council might not go that far, its statement does not clearly explain why it has found a conflict with LP Policies 6.1, 6.6 and 6.13 in the circumstances that prevail here.'*

The Inspector concluded on highways impact at paragraph 21 *'On the first main issue I conclude the use would not result in an unacceptable increase in vehicular movements or unacceptable traffic congestion in the area.*

Rainbow and Kirby Industrial Estate Site

Outline planning permission was granted on 23rd July 2014 for;

'Demolition of existing premises and erection of 99 residential units (C3), 50 unit extra care/dementia sheltered housing scheme (C3), 1,529.4sq.m light industrial floorspace comprising 17 business units (B1c) and 611.30sq.m of restaurant/cafe (A3) floorspace, associated open space, car parking and landscaping (Outline Application)' (LPA Ref: 38058/APP/2013/1756) ('the 2014 Permission').

The Transport Assessment submitted with the application concluded:

- The proposed development fully accords with national and local transportation policy and offers a site location with a reliable and free-flowing road network which enables the efficient movement of people.
- The site is well situated and offers alternative sustainable modes of transport, other than the private car.
- It is located within 250m of three bus stops and within walking distance to West Drayton Railway Station which are served frequently by numerous services. Existing cycling and pedestrian provisions improve the sustainability of the site and surrounding area.
- The proposed level of parking for the development is in line with the standards set out by LBH and will provide sufficient parking space to cope with demand without promoting use of the private car. Cycle parking will also be provided to meet the needs of the development and will be in line with local standards.
- The junction capacity assessments demonstrate that the proposed development will not have any detrimental impact on the local highway network.
- All junctions operate well within their practical capacity during each scenario within the AM and PM peaks. It has also been established within this transport assessment that the proposed development will generate lower levels of vehicular traffic than that of the extant permission during both peak periods.
- On the basis of this transport assessment it is considered that the proposed development can be accommodated within the local area. As such, there should be no reason why the application cannot be recommended for approval in terms of highways and transportation.

A Reserved Matters application was submitted in April 2017 for;

'Reserved Matters relating to Appearance and Landscaping of outline planning permission ref: 38058/APP/2013/1756 dated 23-07-2014 for Demolition of existing premises and erection of 99 residential units (C3), 50 unit extra care/dementia sheltered housing scheme (C3), 1,529.4sq.m light industrial floorspace comprising 17 business units (B1c) and 611.30sq.m of restaurant/cafe (A3) floorspace, associated open space, car parking and landscaping.' (LPA Ref. 38058/APP/2017/1340) ('the Reserved Matters application').

Following extensive engagement with LB Hillingdon over more than 18 months the Reserved Matters were considered by LB Hillingdon's Major Applications Planning Committee on 4th December 2018 and Members Resolved to grant permission. A decision notice was issued on 6th December 2018.

The 2014 Outline and 2018 Reserved Matters remain extant.

1.3 Policy

NATIONAL POLICY

National Planning Policy Framework (2019)

The National Planning Policy Framework (NPPF) sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.

Section 9 – Promoting Sustainable Transport, paragraph 102 of the framework details *'the need for transport issues to be considered at the early stages of plan making and development proposals, so that:*

- a) *the potential impacts of development on transport networks can be addressed*
- b) *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated*
- c) *opportunities to promote walking, cycling and public transport use are identified and pursued*
- d) *the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains*
- e) *patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.'*

Considering development proposals, paragraph 108 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) *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.'*

NPPF paragraph 109 states that *'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.'*

In the context of this guidance, 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*
- e) *be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.'*

NPPF paragraph 111 states all 'developments which generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement of transport assessment so that the likely impacts of the proposal can be assessed.'

Changes to Land Use Classes (September 2020)

From 1st September 2020, for purposes of Use Class, A1/2/3 & B1 to be treated as Class E. Use Class D1 is now split out and replaced by the new Classes E (e-f) and F1. Use Class D2 is now split out and replaced by the new classes E (d) and F2 (c-d) as well as several newly defined 'Sui Generis' uses.

For any planning applications submitted before 1st September 2020, the Use Classes in effect when the application was submitted will be used to determine the application.

For any reference to Permitted Development rights, and for restrictions to them or applications for Prior Approval, the Use Classes in effect prior to 1 September 2020 will be the ones used until the end of July 2021 (this is defined as the 'material period' in legislation so may be referred to as such).

REGIONAL POLICY

London Plan – March 2021

The latest version of the London Plan was adopted in March 2021 and Chapter 10 deals with transport. The relevant policies relating to transport are set out below.

Policy T1 - Strategic approach to transport

- A. Development Plans should support, and development proposals should facilitate:
 - 1) the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041
 - 2) the proposed transport schemes set out in [Table 10.1](#).
- B. All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

Policy T2 - Healthy Streets

- A Development proposals and Development Plans should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling.
- B Development Plans should:
 - 1) promote and demonstrate the application of the Mayor's Healthy Streets Approach to: improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities.

- 2) identify opportunities to improve the balance of space given to people to dwell, walk, cycle, and travel on public transport and in essential vehicles, so space is used more efficiently and streets are greener and more pleasant.
- C In Opportunity Areas and other growth areas, new and improved walking, cycling and public transport networks should be planned at an early stage, with delivery phased appropriately to support mode shift towards active travel and public transport. Designs for new or enhanced streets must demonstrate how they deliver against the ten Healthy Streets Indicators.
- D Development proposals should:
- 1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance
 - 2) reduce the dominance of vehicles on London's streets whether stationary or moving
 - 3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

Policy T3 - Transport capacity, connectivity and safeguarding

- A Development Plans should develop effective transport policies and projects to support the sustainable development of London and the Wider South East as well as to support better national and international public transport connections.
- B Development Plans and development decisions should ensure the provision of sufficient and suitably-located land for the development of the current and expanded public and active transport system to serve London's needs, including by:
- 1) safeguarding existing land and buildings used for public transport, active travel or related support functions (unless alternative facilities are provided to the satisfaction of relevant strategic transport authorities and service providers that enable existing transport operations to be maintained and expanded if necessary)
 - 2) identifying and safeguarding new sites/space and route alignments, as well as supporting infrastructure, to provide necessary strategic and local connectivity and capacity by public transport, walking and cycling, as well as to allow for sustainable deliveries and servicing
 - 3) safeguarding London's walking and cycling networks
- C Development Plans should appropriately safeguard the schemes outlined in Table 10.1. Development proposals should provide adequate protection for and/or suitable mitigation to allow the relevant schemes outlined in Table 10.1 to come forward. Those that do not, or which otherwise seek to remove vital transport functions or prevent necessary expansion of these, without suitable alternative provision being made to the satisfaction of transport authorities and service providers, should be refused.
- D In Development Plans and development decisions, particular priority should be given to securing and supporting the delivery of upgrades to Underground lines, Crossrail 2, the Bakerloo line extension, river crossings and an eastwards extension of the Elizabeth line.
- E Development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.

Policy T4 - Assessing and mitigating transport impacts

- A Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.

- B When required in accordance with national or local guidance,¹⁷⁹ transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.¹⁸⁰
- C Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.
- D Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will be contingent on the provision of necessary public transport and active travel infrastructure.
- E The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.
- F Development proposals should not increase road danger.

Policy T5 - Cycling

- 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.¹⁸² 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.

Policy T6 - Car parking

- 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.
- C 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.
- 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.
- F Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all use classes.
- G Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles in line with Policy T6 .1 Residential parking, Policy T6 .2 Office Parking, Policy T6 .3 Retail parking, and Policy T6 .4 Hotel and leisure uses parking. All operational parking should make this provision, including offering rapid charging. New or re-provided petrol filling stations should provide rapid charging hubs and/or hydrogen refuelling facilities.
- H Where electric vehicle charging points are provided on-street, physical infrastructure should not negatively affect pedestrian amenity and should ideally be located off the footway. Where charging points are located on the footway, it must remain accessible to all those using it including disabled people.
- I Adequate provision should be made for efficient deliveries and servicing and emergency access.
- J A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design.
- K Boroughs that have adopted or wish to adopt more restrictive general or operational parking policies are supported, including borough-wide or other area-based car-free policies. Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards set out in Policy T6 .1 Residential parking) must only do so for parts of London that are PTAL 0-1. Inner London

boroughs should not adopt minimum standards. Minimum standards are not appropriate for non-residential use classes in any part of London.

- L Where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy. Some flexibility may be applied where retail sites are redeveloped outside of town centres in areas which are not well served by public transport, particularly in outer London.

Policy T6.2 Office Parking

- A The maximum parking standards set out in Table 10.4 should be applied to new office development.
- B In well-connected parts of outer London, including town centres, in close proximity to stations and in Opportunity Areas, office developments are encouraged to be car-free.
- C Car parking provision at Use Classes Order B2 (general industrial) and B8 (storage or distribution) employment uses should have regard to these office parking standards and take account of the significantly lower employment density in such developments. A degree of flexibility may also be applied to reflect different trip-generating characteristics. In these cases, appropriate provision for electric or other Ultra-Low Emission vehicles should be made.
- D Outer London boroughs wishing to adopt more generous standards are required to do so through an evidence-based policy in their Development Plan that identifies the parts of the borough in which the higher standards will be applied, and justifies those standards, including:
 - 1) the provision and operation of (existing and future) public transport, especially in relation to bus reliability
 - 2) the impact on the ability to deliver Healthy Streets, promote active travel and deliver mode shift
 - 3) the impact on congestion and air quality locally and on neighbouring boroughs and districts outside London as appropriate
 - 4) a commitment to increase or enhance publicly-available cycle parking
 - 5) a requirement (via Travel Plans) to reduce car parking provision over time and convert it to other uses.
- E Boroughs should not seek to adopt more generous standards borough-wide.
- F Operational parking requirements should be considered on a case-by-case basis. All operational parking must provide infrastructure for electric or other spaces.
- G A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision.
- H Disabled persons parking should be provided as set out in Policy T6 .5 Non-residential disabled persons parking.

Table 10.4 - Maximum office parking standards

Location	London Plan*
Central Activity Zones	Car-free^
Outer London Opportunity Areas	Up to 1 space per 600m ² (GIA)
Outer London	Up to 1 space per 100m ² (GIA)
Outer London identified through a DPD where more generous standards apply	Up to 1 space per 50m ² (GIA)

* Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed

^ With the exception of disabled persons parking, see Policy T6 .5 Non-residential disabled persons parking

Policy T6.5 Non-residential disabled persons parking

- A Disabled persons parking should be provided in accordance with the levels set out in Table 10.6, ensuring that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.
- B Disabled persons parking bays should be located on firm and level ground, as close as possible to the building entrance or facility they are associated with.
- C Designated bays should be marked up as disabled persons parking bays from the outset.
- D Enlarged bays should be large enough to become disabled persons parking bays quickly and easily via the marking up of appropriate hatchings and symbols and the provision of signage, if required i.e. if it can be demonstrated that the existing level of disabled persons parking is not adequate. The process for converting enlarged bays should be set out in a Parking Design and Management Plan and secured at the planning stage.
- E Designated disabled persons parking bays and enlarged bays should be designed in accordance with the design guidance provided in BS8300: Vol 1.

Policy T7 - Deliveries, servicing and construction

- A Development plans and development proposals should facilitate sustainable freight movement by rail, waterways and road.
- B Development Plans, Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans should include freight strategies. These should seek to:
 - 1) reduce freight trips to, from and within these areas
 - 2) coordinate the provision of infrastructure and facilities to manage freight at an area-wide level
 - 3) reduce road danger, noise and emissions from freight, such as through the use of safer vehicles, sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles.

Such strategies should be developed through policy or through the formulation of a masterplan for a planning application

- C To support carbon-free travel from 2050, the provision of hydrogen refuelling stations and rapid electric vehicle charging points at logistics and industrial locations is supported.
- D Development Plans should safeguard railheads unless it can be demonstrated that a railhead is no longer viable or capable of being made viable for rail-based freight-handling. The factors to consider in assessing the viability of a railhead include:
- planning history, environmental impact and its relationship to surrounding land use context – recognising that the Agent of Change principle will apply
 - location, proximity to the strategic road network and existing/potential markets
 - the existing and potential contribution the railhead can make towards catering for freight movements by non-road modes
 - the location and availability of capacity at alternative railheads, in light of current and projected capacity and market demands.
- E Consolidation and distribution sites at all scales should be designed to enable 24-hour operation to encourage and support out-of-peak deliveries.
- F Development proposals for new consolidation and distribution facilities should be supported provided that they do not cause unacceptable impacts on London's strategic road networks and:
- 1) reduce road danger, noise and emissions from freight trips
 - 2) enable sustainable last-mile movements, including by cycle and electric vehicle
 - 3) deliver mode shift from road to water or rail where possible (without adversely impacting existing or planned passenger services).
- G Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.
- H Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.
- I At large developments, facilities to enable micro-consolidation should be provided, with management arrangements set out in Delivery and Servicing Plans.
- J Development proposals must consider the use of rail/water for the transportation of material and adopt construction site design standards that enable the use of safer, lower trucks with increased levels of direct vision on waste and landfill sites, tip sites, transfer stations and construction sites.
- K During the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times.

LOCAL POLICY

London Borough of Hillingdon Local Plan: Part 1 (November 2012)

The Local Plan Part 1 was formally adopted in November 2012 and Chapter 9 covers the cover policies for Transport and Infrastructure. The following policies are relevant to Transport.

Policy T1: Accessible Local Destinations

The Council will steer development to the most appropriate locations in order to reduce their impact on the transport network. All development should encourage access by sustainable modes and include good cycling and walking provision.

The Council will ensure access to local destinations which provide services and amenities.

The Council will promote active travel through improvements to Hillingdon's public rights of way.

Policy T2: Public Transport Interchanges

The Council will facilitate improved public transport interchanges at Uxbridge, Hayes, West Drayton, Heathrow Airport, West Ruislip and other locations as appropriate in the future. These interchanges will accommodate measures to encourage subsequent shorter journeys to be completed on foot or by cycle.

Policy T3: North-South Sustainable Transport Links

The Council will improve north-south public transport links in the borough and link residential areas directly with employment areas and transport interchanges.

Policy T4: Heathrow Airport

Recognising the economic importance of the airport to the borough this Hillingdon Local Plan: Part 1- Strategic Policies will support the sustainable operation of Heathrow within its present boundaries and growth in the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links, enhancing the public transport interchange to provide the opportunity for a modal shift from the use of private cars and from short haul air to sustainable transport modes and providing transport infrastructure to accommodate economic and housing growth whilst improving environmental conditions, for example noise and local air quality for local communities.

Policy T5: Crossrail

Subject to the other local priorities set out in this Hillingdon Local Plan: Part 1- Strategic Policies and other Part 2 Policies, the Council will seek planning contributions from appropriate commercial development towards the provision of the Crossrail project in accordance with the requirements of the London Plan.

Policy CI3: Culture

To ensure that cultural uses help improve the quality of life of residents and visitors, a strong and well-developed cultural provision will be established by:

- Safeguarding the quality of existing viable cultural facilities and supporting proposals for new and improved cultural facilities;
- Identifying the need for new culture and arts facilities in the north of the borough and in the identified Opportunity Areas of Yiewsley/ West Drayton;
- Protecting the historic environment as a cultural resource;
- Promoting Uxbridge Town Centre, Compass Theatre (Ickenham), Manor Farm (Ruislip) and Beck Theatre (Hayes) as key cultural centres for the arts serving Hillingdon and the wider sub-region;

- Ensuring all facilities promote walking, cycling and sustainable transport measures. The inclusion of cycle storage and electric charging points will be encouraged in new facilities and installed in existing facilities;
- In locations where new development needs access to cultural facilities, developer contributions will be sought to provide for new and expanded services.

London Borough of Hillingdon Local Plan: Part 2 (January 2020)

The Local Plan Part 2 was formally adopted in January 2020 and Chapter 8 covers the cover policies for Transport and Aviation. The following policies are relevant to Transport.

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. In order for developments to be acceptable they are required to:

- i) be accessible by public transport, walking and cycling either from the catchment area that it is likely to draw its employees, customers or visitors from and/or the services and facilities necessary to support the development;
- ii) maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users;
- iii) provide equal access for all people, including inclusive access for disabled people;
- iv) adequately address delivery, servicing and drop-off requirements; and
- v) have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.

B) Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds. All major developments¹¹ that fall below these thresholds will be required to produce a satisfactory Transport Statement and Local Level Travel Plan. All these plans should demonstrate how any potential impacts will be mitigated and how such measures will be implemented.

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 3: Road Safeguarding

Permission will not be granted for development that would prejudice the implementation of the Hayes By-Pass link to the former gas works site, Southall.

Policy DMT 4: Public Transport

A) The Council will support and promote the enhancement of public transport facilities, including at key interchanges that address the needs of the Borough. The Council may require developers to mitigate transport impacts from development proposals by improving local public transport facilities and services, which may include:

- i) improvements to address inclusive access;
- ii) ensuring that bus stops are conveniently located for passengers;
- iii) implementation of bus priority and bus stop accessibility measures;
- iv) providing for bus route requirements and associated road layouts;
- v) improvements to the network of services; and
- vi) improvements to infrastructure to support cycling.

B) Public transport measures may be required to be included in the highways layout design where they are identified in a transport assessment, travel plan or integral to the acceptability of the proposal.

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, including:

- i) the retention and, where appropriate, enhancement of any existing pedestrian and cycle routes;
- ii) the provision of a high quality and safe public realm or interface with the public realm, which facilitates convenient and direct access to the site for pedestrian and cyclists;
- iii) the provision of well signposted, attractive pedestrian and cycle routes separated from vehicular traffic where possible; and
- iv) the provision of cycle parking and changing facilities in accordance with Appendix C, Table 1 or, in agreement with Council.

B) Development proposals located next to or along the Blue Ribbon Network will be required to enhance and facilitate inclusive, safe and secure pedestrian and cycle access to the network. Development proposals, by virtue of their design, will be required to complement and enhance local amenity and include passive surveillance to the 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. The Council may agree to vary these requirements when:

i) the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and/or

ii) a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations.

B) All car parks provided for new development will be required to contain conveniently located reserved spaces for wheelchair users and those with restricted mobility in accordance with the Council's Accessible Hillingdon SPD.

Policy DMT 7: Freight

A) Development proposals that generate a high number and/or intensity of transport and movements such as those relating to logistics and distribution or freight will be required to demonstrate that:

i) they are conveniently located to enable direct routing to the strategic road network; and

ii) there is no deleterious impact on residential areas, local air quality levels, local amenity or the highway network.

B) The Council will in principle support the use of the Blue Ribbon Network for rail and freight transport subject to compliance with other policies of this Local Plan.

1.4 Scope of the Transport Assessment

Following this introduction, the report is structured as follows:

Section 2.0, Baseline Conditions: Describes the existing land use, local area, existing road network, public transport, walking and cycling infrastructure, and other features pertinent to the development.

Section 3.0, Trip Generation: Considers the level of traffic to be attracted by the proposed development once occupied on the local highway network. This section will also set out estimated trips for all modes.

Section 4.0, Construction: Considers the construction trips generated, construction routes, and impacts on pedestrian routes/footways.

Section 5.0, Impacts: Considers the level of traffic and movements associated with all modes to be generated and attracted by the proposed development once occupied on the local highway network.

Section 6.0, Summary and Conclusions: Provides a summary of the report and draws together its conclusions.

2 BASELINE CONDITIONS

2.1 Existing and Permitted Land Use

Until recently the site was leased by 'Drivefly' who operates airport related valet car parking on a temporary basis for approximately 500 spaces. Drivefly also offer hotel overflow parking. However, the COVID pandemic has curtailed this activity.

2014 Outline and 2018 Reserved Matters Permission

As set out in Section 1 the wider Rainbow and Kirby Industrial Estate site (which includes part of the appeal site) has extant planning permission for the erection of 99 residential units (C3), 50 unit extra care/dementia sheltered housing scheme (C3), 1,529.4sq.m light industrial floorspace comprising 17 business units (B1c) and 611. 30sq.m of restaurant/cafe (A3) floorspace, associated open space, car parking and landscaping under the 2013 Outline Permission and the 2018 Reserved Matters.

In determining the 2017 Enforcement Notice Appeal for use of the site for car parking, the Inspector identified stated: "it is clear the level of vehicular movements is significantly less than that likely to be generated by the permitted use" and he applied weight on this extant permission when considering the temporary use of the site.

Currently the site is used for a variety of uses across the site (without permission). The two portacabins previously used as offices and a waiting room for park and ride customers associated with the previous airport parking are centrally located off the hardstanding area off the Trout Road entrance.

One cabin used for site security (including 1 x security staff) and includes CCTV control and screens for surveillance of the site. This security cabin is also linked to an intercom by the Trout Road gates to manage access into the site for visitors. Second cabin used for ancillary tenant offices and includes a toilet for all staff on the site.

Container storage has a flexible location depending on tenant requirements, 7 containers currently located around site perimeter on Trout Road part of the site and to the rear by Grand Union Canal. Maximum number of containers on site would be 30.

Open and closed storage of building, scaffolding and aggregate materials are flexibly located to meet tenant requirements. Building and scaffolding materials proposed more centrally in site to rear of existing commercial uses to limit any impact on residential amenities. Materials stored on metal / wireframe racks.

Aggregate materials are stored on-site, however no mixing occurs on site. Mixing happens on vehicles at the location where the materials are required. Located to rear of the site by Grand Union canal to minimise impacts on residential amenities.

Vehicle storage and sales are located on existing hardstanding area by the site entrance on Trout Road

2.2 Local Highway Network

The site is approximately 5.5km north of Heathrow Airport which is attainable by 20-minutes by car via the M25 or the M4. The M4 runs in an east-west direction is approximately 2km south of the site connects to the A4 and into central London in the east. Junction 15 of the M4 provides access to the M25.

As shown in **Figure 1.1** the site is located on the southern side of Trout Road, and the northern side of St Stephen's Road. Grand Union Canal is located to the west of the site and flows in a north to south direction.

Trout Road is a single carriageway residential road linking north east to a four-arm junction between High Street (northern and southern arm) and Falling Lane (eastern arm). The road measures around 4.5m to 6m in width and is subjected to 30mph speed limit. There are dedicated pedestrian crossing facilities on all arms, containing signal heads, dropped kerbs and tactile paving to aid the visually impaired. On street parking is in place intermittently for the use of permit holders (Monday to Saturday 9:00am to 6:00pm), single and double yellow lines are present for the remainder of the road to prevent on street parking. Footways are provided on either side of the carriageway and the road is lit accordingly.

South-west on Trout Road, a bridge provides access over the Grand Union Canal. Pedestrian dropped kerb crossings are located on both sides of the bridge to provide safe crossing of the pedestrians, with a footway on the southern side of the bridge. The width of the road reduces to only allow a single lane of traffic to pass over the bridge at one time and is therefore signal controlled to prevent vehicles from meeting. The bridge has a weight limit of 7.5t.

High Street (A408) is a single carriageway distributor road and links to Trout Road via a roundabout. High Street provides a limited number of Pay and Display bays (Monday to Saturday 8:00am to 6:30pm), disabled bays and loading bays. There are bus stops either side of the road and parking bays marked further down on the western side of the carriageway to the north of the bus stop, which are for the use of disabled badge holders and loading bays for goods vehicles loading for 20-minutes at a time. There are footways on both sides of the road and there is a 20mph speed limit imposed with the appropriate street lighting.

St Stephen's Road is a residential loop road linking to High Street at both ends of the road. The single carriageway road is approximately 6m in width and is subject to 30mph speed limit. At the north end of St Stephen's Road there is no right-hand turn onto High Street. On street parking is in place intermittently for the use of permit holders (Monday to Saturday 9:00am to 6:00pm), single yellow lines for the remainder of the road are present to prevent on street parking. Footways are provided on either side of the carriageway except for the southern section, and the road is lit accordingly.

2.3 Existing Parking and Access

Trout Road is the main access route to the site.

St Stephen's Road was previously used as an access route at the time of the original Enforcement Notice, however in order to comply with condition 3 of the 2017 Enforcement Notice Appeal Decision which stated a 2.4m x 2.4m pedestrian visibility splay and an unobstructed access for vehicles is required, this is now used as an emergency access only.

Previously there was a temporary car park providing around 500 (unmarked) car parking spaces. Parking for each use is currently provided in unmarked bays across the site.

Traffic surveys were undertaken at the site access for the previous airport parking use. Traffic surveys were undertaken on Thursday 16th May to Sunday 19th May 2019 and summarised in **Table 2.1** below. A full set of results is presented at **Appendix A**.

Table 2.1 – Existing Vehicular Movements – Temporary Car Park Use

Day	Morning Peak Hour Arrivals	Peak Hour Departures	Evening Peak Hour Arrivals	Peak Hour Departures	All Day Arrivals	All Day Departures
Thursday	8	3	5	7	97	84
Friday	9	5	10	8	153	117
Day	Peak Hour		Peak Hour		All Day	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Saturday		9		3	117	89
Sunday		6		7	83	140

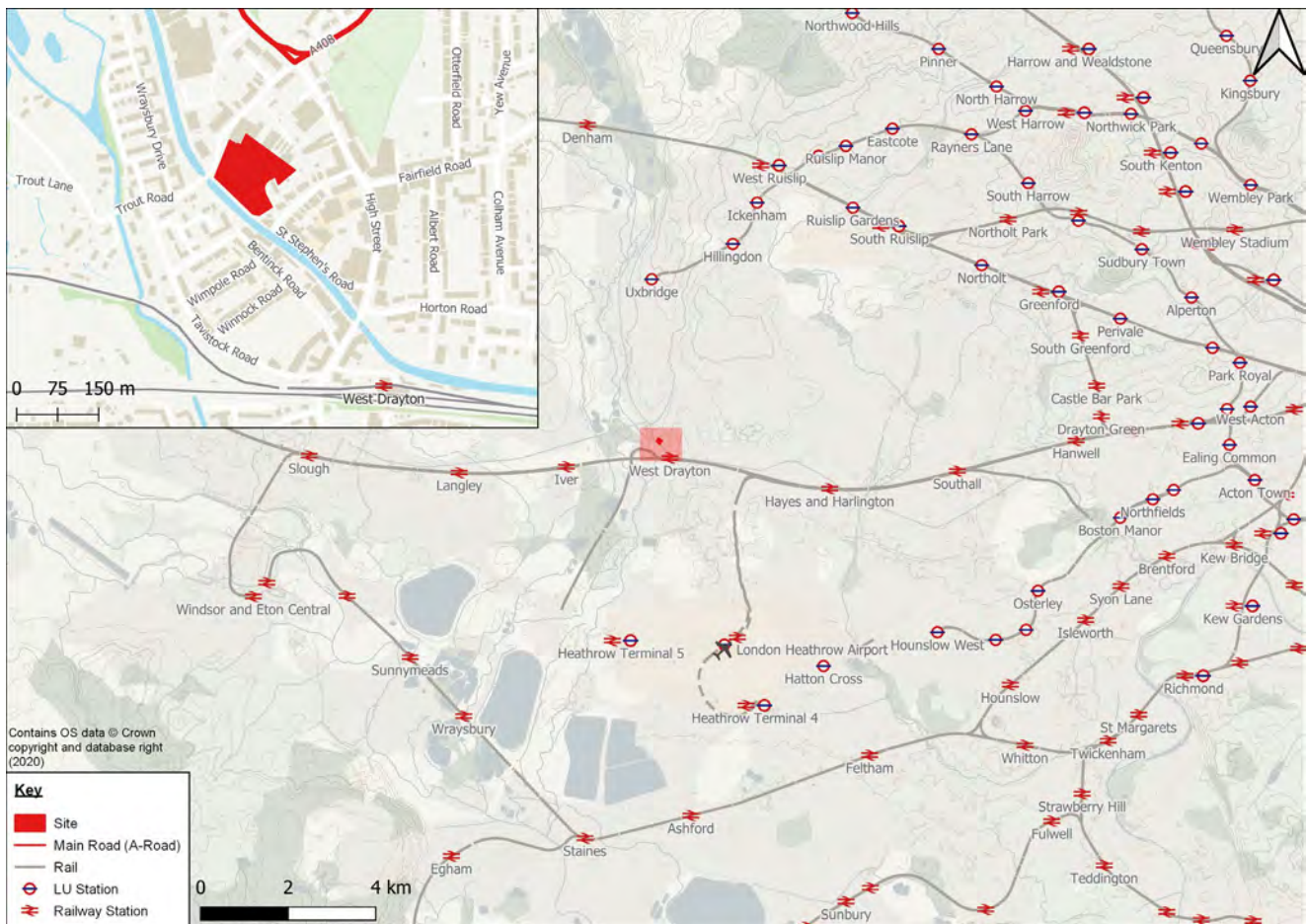
As discussed in greater detail within Section 3, the number of vehicular movements associated with the proposed temporary use are below the extant mixed-use planning permission and airport parking. This conclusion was also reached by the Inspector in determining the 2017 Enforcement Notice Appeal for car parking on the site who stated '*..it is clear the level of vehicular movements is significantly less than that likely to be generated by the permitted use*'.

All servicing movements for the existing and previous land uses occur from Trout Road. There is a site compound directly off Trout Road which allows all service vehicles to enter and leave in a forward gear.

2.4 Rail

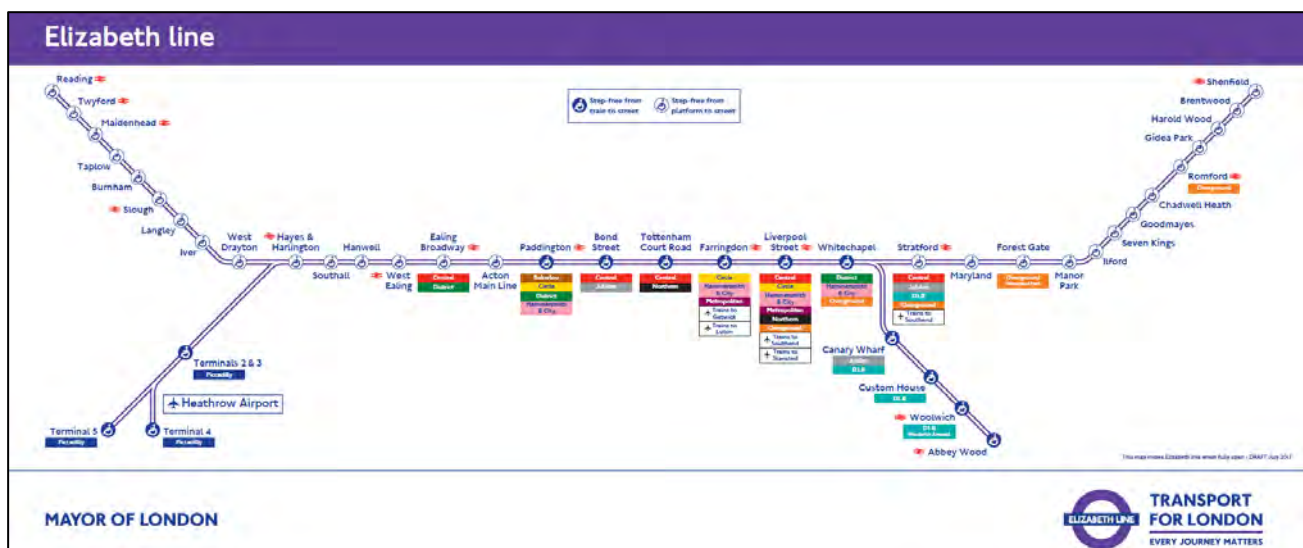
Staff and visitors have the opportunity to use West Drayton rail station which is located approximately 900m (an 11-minute walk) south from the site. This station provides access to Great Western Railway services to Reading, London Paddington and Didcot Parkway. **Figure 2.1** below confirms the rail links towards London and the surrounding areas.

Figure 2.1 – Rail links



Additionally, major improvements are being delivered at West Drayton station as part of the plans to introduce the Elizabeth Line and accessibility to central London (Paddington) will be significantly improved. The Elizabeth line services Reading, Maidenhead and Heathrow through central London as shown in **Figure 2.2** below.

Figure 2.2 – Elizabeth Line Route Plan



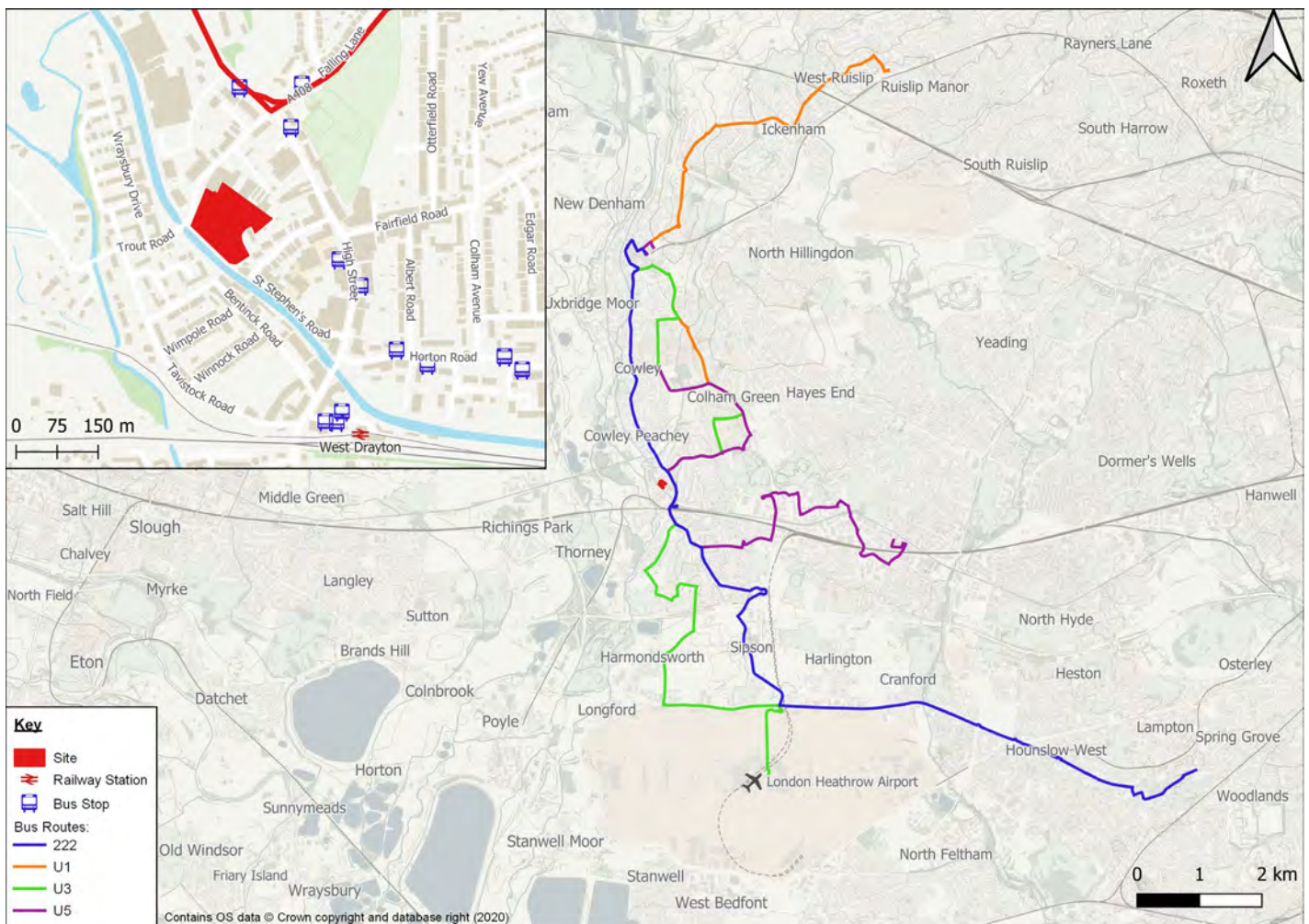
These improvements would increase the sustainability and travel options of people travelling to the area, however, the Elizabeth Line has been plagued with delays. Crossrail Ltd announced that it plans to bring the Elizabeth Line into passenger service as soon as practically possible in the first half of 2022.

2.5 Buses

There are four bus services available within walking distance of the site which are particularly useful for staff. The nearest bus stops to the site are situated on High Street approximately 240m (a 3-minute walk) from the site, providing access to routes numbered 222, U1, U3 and U5 and approximately 270m (a 4-minute walk) from the site, providing access to route number 222. A further bus stop is located on Falling Lane approximately 260m (a 4-minute walk) from the site, providing access to routes numbered U1, U3 and U5.

Figure 2.3 below shows all of the services locally available. The map shows that staff and visitors will be able to directly connect to a range of transport interchanges and destinations.

Figure 2.3 – Local Bus Routes



Details of each of the bus services with regards to the route and the general frequency of the service provision are outlined in **Table 2.2** below.

Table 2.2 – General Daytime Frequency of Bus Services (frequency per hour)

Number	Route	Frequency	Distance to Stop (m)
222	Uxbridge – Hounslow	7.5	240m
U1	West Drayton – Ruislip	4	240m
U3	Heathrow – Uxbridge	5	240m
U5	Hayes– Uxbridge	5	240m

As shown by the service details in **Table 2.2**, it can be seen that the range of bus services available close to the site provide good connection to local town, retail and commercial centres as well as connection with alternate modes of public transport.

2.6 Public Transport Accessibility Level (PTAL)

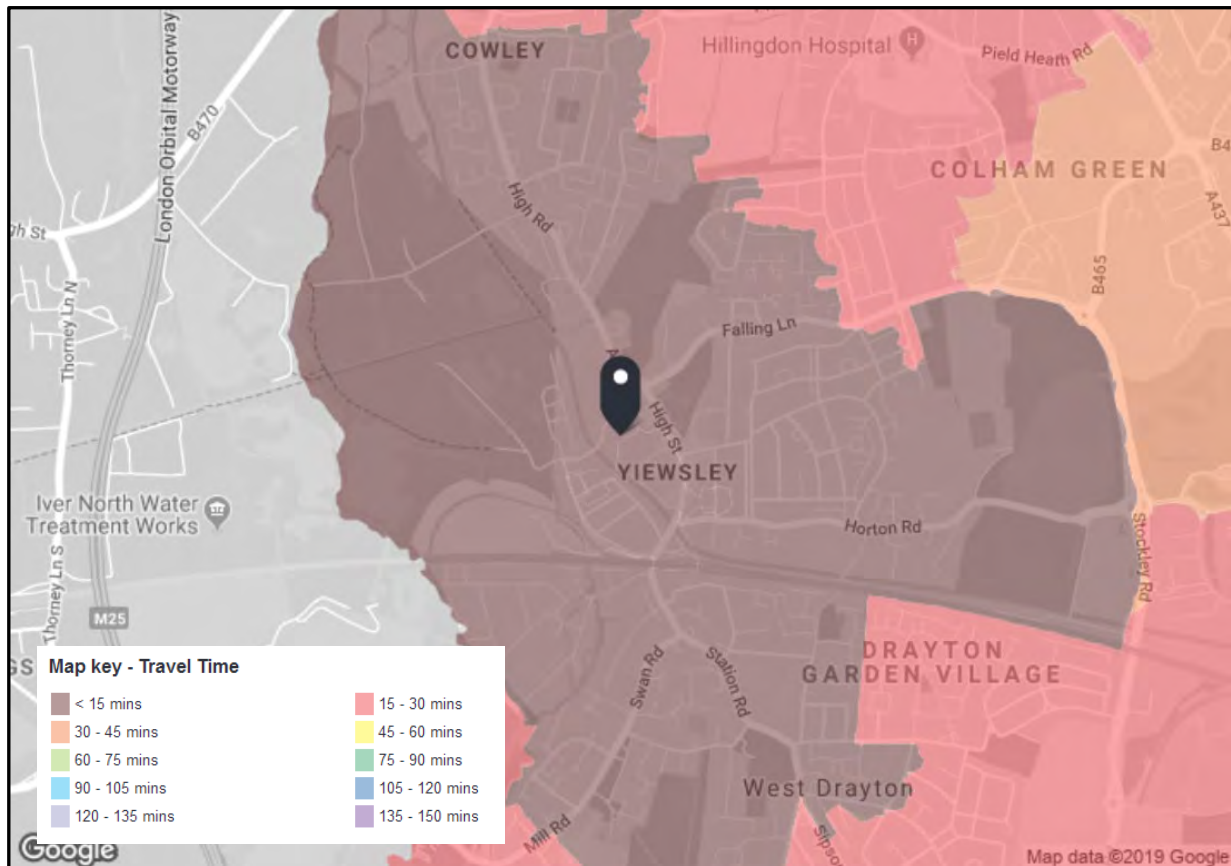
PTAL calculations are a detailed and accurate measure of the accessibility of a point to the public transport network, taking into account walk access time and service availability. A point is given an Accessibility Index (AI) which is then converted into an equivalent PTAL score between 1 (low accessibility) and 6 (highest accessibility).

The address of the site was put into the TfL website <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat> to establish accessibility. It can be seen from the calculation of the PTAL attached at **Appendix B** that the site falls partly within the PTAL band of 2 and partly in PTAL 3 (medium accessibility). This level of accessibility provides staff with public transport alternatives to the private car.

2.7 Time Mapping (TIM)

TfL's Time Mapping analysis (TIM) assesses connectivity through the transport network or, in other words, how far a traveller can go within a given time from a specific destination. As shown in **Figure 2.4** below a large area (Yiewsley town centre) is accessible within 15 minutes allowing convenient access to numerous, retail, leisure, and commercial land uses. This is useful in allowing staff to make sustainable travel choices in travelling to and from work, personal banking and shopping etc.

Figure 2.4 – TfL TIM Output



2.8 Walking and Cycling

There are footways on either side of Trout Road linking the site with retail developments and access to public transport facilities. There are pedestrian crossings on all four arms on the roundabout located at the end of Trout Road northern boundary of the site for the safe passage of those on foot. These pedestrian crossings incorporate signal heads, flush dropped kerbs and tactile paving to aid the visually impaired.

Figure 2.5 shows the cycling environment surrounding the area. It can be seen that there are many cycle routes in the immediate vicinity signed for cyclists, including High Street, closely linking the site to the surrounding area.

Figure 2.5 - Local Cycling Map



From the above, it is apparent that the application site is accessible by modes of transport other than the private car for staff working at the application site. There are bus stops within a very short walking distance of the site, providing frequent and reliable services on four bus routes. The public transport provision, along with the secure and covered cycle parking within the site, will encourage staff to use an alternative mode to the private car.

3 TRIP GENERATION

To consider the suitability of the potential impact that the proposed development may have on the local highway network, it is necessary to determine the level of trip generation expected during weekday morning (from 8am to 9am) and evening (from 5pm to 6pm) peak periods and daily.

3.1 2014 Outline and 2018 Reserved Matters

As set out in Section 1.2 the site has permission for 99 residential units (C3), 50 unit extra care/dementia sheltered housing scheme (C3), 1,529.4sq.m light industrial floorspace comprising 17 business units (B1c) and 611. 30sq.m of restaurant/cafe (A3) floorspace under the 2014 Outline and 2018 Reserved Matters.

The trip generation for this approved scheme was set out and approved SKM Colin Buchan Transport Assessment (August 2013) Table 4-17 which has been reproduced below in **Table 3.1**.

Table 3.1 – Consented Mixed Use Scheme

Mode	Morning Peak Hour		Evening Peak Hour		All Day	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Car Driver	30	16	10	35	180	171
Car Passenger	3	4	3	6	53	49
Bus	5	11	6	7	78	73
Motor Cycle	0	0	0	0	2	2
Pedal Cycle	1	1	1	1	8	7
Rail	5	13	7	7	88	82
Taxi	0	0	0	0	2	2
Walk	4	9	5	5	63	58
Total	48	54	32	61	474	444

As set out above the approved scheme would generate a total 351 car movements per day with 46 movements in the morning peak hour and 45 movements in the evening peak hour. These associated movements are permitted on the local highway network.

When all modes are considered there are some 918 movements in total per day.

3.2 Former Temporary Car Park Use

As set out in Section 2.3. surveys were undertaken at the site to capture the number of movements arriving and departing the site per day for the former airport parking use. Friday was the busiest day and the results have been reproduced below in **Table 3.2**.

Table 3.2 – Existing Vehicular Movements – Temporary Car Park Use

Day	Morning Peak Hour		Evening Peak Hour		All Day	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Friday	9	5	10	8	153	117

A set out in **Table 3.2** a total of 270 vehicles entered and exited the site, 96 of these movements were by shuttle bus, confirming the sustainable nature of the business. Importantly, only 9 arrivals and 5 departures occurred during the morning peak hour and 10 arrival and 8 departures during the evening peak hour.

3.3 Proposed Sui Generis Use

As set out in Sections 1.1 and 2.1 the site is currently be utilised for sui generis uses including container storage; open and closed storage of building, scaffolding and aggregate materials; vehicle storage and sales; and other commercial uses.

A traffic survey was conducted at the site access onto Trout Road on Wednesday 14th July 2021 to establish the traffic generated at the site. A copy of the survey is attached as **Appendix C** and a summary of the results is set out in **Table 3.3** below.

Table 3.3 – Peak Hour and Daily Trips for Sui Generis Uses (Traffic Survey)

Mode	Morning Peak Hour		Evening Peak Hour		All Day	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Total Vehicles	8	7	4	5	79	84

It is understood that the industrial uses currently on-site are operating at around 50% of their capacity so the traffic flows for each time period have been doubled and the traffic flows, should the site be fully operational, are set out in **Table 3.4**.

Table 3.4 – Peak Hour and Daily Trips for Sui Generis Uses (At Full Capacity)

Mode	Morning Peak Hour		Evening Peak Hour		All Day	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Total Vehicles	16	14	8	10	158	168

It can be seen in **Table 3.4** above that that sui generis uses proposed have the potential to generate 30 vehicle movements in the morning peak hour, 18 vehicle movements in the evening peak hour and 326 vehicle movements per day.

3.4 Net Impact

The net impact of the proposed continued temporary use is considered in **Table 3.5** below.

Table 3.5 – Consented Mixed Use Scheme Comparison with Proposed Sui Generis Uses

Mode	All Day	
	Arrivals	Departures
Consented Scheme (Table 3.1)	180	171
Former Temporary Car Park (Table 3.2)	153	117
Proposed sui generis uses (Table 3.4)	158	168

As shown in **Table 3.5** the proposed sui generis uses (if fully operational) have the potential to generate 25 fewer daily movements than the consented mixed-use scheme and 56 additional daily movements than the former airport parking use. There would be 16 fewer morning peak hour traffic movements and 27 fewer evening peak hour movements when compared with the consented scheme.

Clearly this demonstrates that no further analysis of the local highway is required given the continued temporary sui generis uses is generates considerably less vehicular movements than the consented scheme or former airport car park. This conclusion was also reached by the Inspector in determining the 2017 Enforcement Notice Appeal for airport car parking on the site as identified below,

‘..it is clear the level of vehicular movements is significantly less than that likely to be generated by the permitted use’.

'...whilst I acknowledge that the parking associated with the permitted scheme is designed to serve the mixed-use development, that does not alter my conclusion that the level of movements is less than that which the Council has previously found to be acceptable, such that it would not compromise the operation of the network',

'In the circumstances I find no conflict with UDP Policy AM2 because the level of traffic generation and impact on the highway network is less than that which the Council has already permitted. I also find compliance with UDP Policy AM7 because the level of traffic generation is acceptable, and the activity would not unacceptably increase the use of junctions at or near capacity, or prejudice the free flow of traffic or conditions of highway or pedestrian safety'.

The Inspector concluded on highways impact 'On the first main issue I conclude the use would not result in an unacceptable increase in vehicular movements or unacceptable traffic congestion in the area.' Therefore, it has been demonstrated that the level of vehicular traffic flow from the existing use could readily be accommodated on the local road network and is well below the impact of 2014 Outline and 2018 Reserved Matters for the wider Rainbow and Kirby Industrial Estate site in accordance with UDP Policy AM2 and AM7.

It is clear therefore that there would be no material impact on the local road network and any committed schemes are irrelevant given consented permission flows already agreed and permitted on the local highway network.

4 CONSTRUCTION

As the site is already operational, construction traffic does not need to be considered. No additional structures or buildings are proposed. However, it should be noted that the approved 2014 Outline and 2018 Reserved Matters mixed-use scheme will likely generate a considerable number of construction vehicle movements over the construction period for a number of years.

5 IMPACTS

5.1 Road Network

The data provided in in Section 3, **Table 3.5** above demonstrates that the proposed sui generis uses (if fully operational) generates 25 fewer daily movements than the consented mixed-use scheme (whose flows are permitted on the local highway). There would be 16 fewer morning peak hour traffic movements and 27 fewer evening peak hour movements when compared with the consented scheme. This is consistent with the LBH Local Plan Part 2 Policy DMT2.

It is considered that these movements could be readily accommodated on the local road network and the impact will be negligible given the temporary use generates considerably less vehicular movements than the approved 2014 Outline and 2018 Reserved Matters scheme. This conclusion was also reached by the Inspector in determining the 2017 Enforcement Notice Appeal.

5.2 Car Parking

2021 London Plan car parking standards for employment uses are set out in Table 10.4 reproduced below.

Table 10.4 - Maximum office parking standards

Location	London Plan*
Central Activity Zones	Car-free^
Outer London Opportunity Areas	Up to 1 space per 600m ² (GIA)
Outer London	Up to 1 space per 100m ² (GIA)
Outer London identified through a DPD where more generous standards apply	Up to 1 space per 50m ² (GIA)

Applying the above to the 84m² floor space within portacabins located on-site means up to 2 car parking spaces should be provided.

Parking is provided in unmarked bays across the site and sufficient space will be provided in accordance with the London Plan.

5.3 Cycle Parking

Table 10.2 of the 2021 London Plan requires that a minimum of one long stay cycle parking space should be provided for each 500m² (GEA) floor space and one short stay space per 1,000m² (GEA).

The temporary development has a floor area of just 84m² within the portacabins on-site so there is no requirement for cycle parking provision.

5.4 Public Transport

There are four bus routes and West Drayton railway station is within a short walk of the site. It is therefore considered that no further assessment is required given the high number of public transport services available.

5.5 Walking and Cycling

Figure 2.5 shows the cycling environment surrounding the site. It can be seen that there are several roads signed for cyclists including High Street, closely linking the site to the surrounding areas. Given the cycling routes around the site there will be a negligible impact on the local highway network. This provides staff options other than the private car.

There are footways on either side of Trout Road and pedestrian crossings on all four arms of the signal controlled junction located at the end of Trout Road northern boundary of the site. This provides a safe passage for pedestrians crossing.

5.6 Cumulative Impacts

It has been demonstrated that the level of vehicular traffic flow could readily be accommodated on the local road network, below the impact of the extant 2014 Outline and 2018 Reserved Matters permission for the wider Rainbow and Kirby Industrial Estate Site (whose flows are permitted on the local highway). This consistent with the LBH Local Plan Part 2 Policy DMT2.

It is clear that there would be no material impact on the local road network and any additional vehicular movements associated with other nearby consented schemes are irrelevant given that extant permission flows are already agreed and permitted on the local highway.

6 SUMMARY AND CONCLUSIONS

- a) YES Engineering Group is instructed by Troutbourne LLP to prepare a Transport Assessment (TA) in support of a temporary planning application for Retention of two portacabins and entrance gates onto Trout Road and use of site for sui generis uses including container storage; open and closed storage of building, scaffolding and aggregate materials; vehicle storage and sales; and other commercial uses on land at Rainbow Industrial Estate, Trout Road, West Drayton, UB7 7XT ('The Site').
- b) The main vehicular access will continue to be via Trout Road. An emergency exit is via St Stephen's Road. All vehicles can enter exit the site the site in a forward gear.
- c) The application site is accessible (PTAL 2/3) by modes of transport other than the private car, a conclusion that was reached by the LBH highway department for the adjacent Onslow Mills, Trout Road application site, which was approved. There are four bus services within walking distance of the site, providing frequent and reliable services to the surrounding areas including West Drayton Rail Station. The public transport provision will encourage staff to use an alternative mode to the private car.
- d) Car parking is provided for the various land uses in accordance with the 2021 London Plan. There is no requirement for cycle parking due to the size of the portacabins on-site.
- e) A traffic survey was conducted at the site access onto Trout Road on Wednesday 14th July 2021 to establish the traffic generated at the site, which confirmed that the peak hour movements are very low.
- f) The proposed sui generis uses (if fully operational) have the potential to generate 25 fewer daily movements than the consented mixed-use scheme and 56 additional daily movements that the former airport parking use. There would be 16 fewer morning peak hour traffic movements and 27 fewer evening peak hour movements when compared with the consented scheme. This is consistent with the LBH Local Plan Part 2 Policy DMT2.
- g) It has been demonstrated that the movements associated the consented scheme can be accommodated (and are permitted) on the local highway network and this permission can be implemented at any point. Therefore, given the sui generis would generate less traffic than the extant permission there is no need to consider the impact of any committed developments.
- h) NPPF paragraph 109 states that *'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.'* As demonstrated within this TA impacts are not severe and below the accepted traffic flows associated with the 2014 Outline and 2018 Reserved Matters.
- i) Overall, it is concluded that there is no highway or transportation reasons to object to the proposed development.

Appendices

Appendix A – Parking Surveys

Appendix B – PTAL

Appendix C – Traffic Survey – Sui Generis Uses