APRIROSE REAL ESTATE INVESTMENT
NCP CAR PARK, NEW ACCESS
BATH ROAD, WEST DRAYTON

TRANSPORT STATEMENT

MAY 2021

the journey is the reward

APRIROSE REAL ESTATE INVESTMENT
NCP CAR PARK, NEW ACCESS
BATH ROAD, WEST DRAYTON

TRANSPORT STATEMENT

MAY 2021

Project Code:	**NCPHeathrow5.1**
Prepared by:	**RK**
Approved by:	**AP**
Issue Date:	**26th May 2021**
Status:	**Final**

Mayer Brown Limited, Lion House, Oriental Road, Woking, Surrey GU22 8AR
Telephone 01483 750508 Fax 01483 750437 wokingoffice@mayerbrown.co.uk www.mayerbrown.co.uk

Aprirose Real Estate Investment
NCP Car park, New Access
Bath Road, West Drayton
Transport Statement

List of Contents

Sections

1 Introduction 1
2 Site Description, Access Proposals and Vehicle Routing 3
3 Existing Traffic Generation 7
4 Junction Capacity.....8
5 Pre-application Response 10
6 Summary and Conclusions 16

Figures

Figure 1.1: Site in Relation to Regional Highway Network……Appended
Figure 1.2: Site in Relation to Local Highway Network……..Appended

Tables

Table 3.1: 2019 Existing A4 Bath Road Traffic Flows 7
Table 3.2: 2019 Existing Traffic Flows along NCP Access Road 7
Table 4.1: Junction Capacity Results AM Peak 8
Table 4.2: Junction Capacity Results PM Peak 9
Table 5.1: Manual Count Point Data on the A4 Bath Road 10
Table 5.2: Traffic Survey Results for 2000, 2010 and 2019 on A4 Bath Road 11
Table 5.3: Manual Count Cycle Flows on A4 Bath Road 12

Appendices

APPENDIX A: Accident Statistics and Analysis
APPENDIX B: Proposed Access Layout and Context Plan
APPENDIX C: Tracking Diagrams
APPENDIX D: 40mph Speed Limit Extension
APPENDIX E: Traffic Survey Results
APPENDIX F: Junction Capacity Modelling
APPENDIX G: 2018 Pre-application TfL Response Letter
Appendix H: Visibility Splays

1 Introduction

1.1 Mayer Brown Limited has been commissioned to prepare this Transport Statement in respect of a proposed new access at the existing NCP car park to the west of the Park Inn Radisson Hotel, Heathrow.

1.2 The site is located just north of the A4 Bath Road and to the east of Sipson Way and provides long term parking for cars while their owners are on leave. The location of the site in context of the local and regional highway network is illustrated in **Figure 1.1 and 1.2** appended hereto.

1.3 The proposals seek to provide direct vehicular access from the site onto the A4 Bath Road in the form of a simple left-in/left-out (LILO) junction, a concept which has been secured in two previous planning applications.

Planning History

1.4 In 2002, an application for a LILO junction at the site was submitted (reference 41632/APP/2002/147), which subsequently proceeded to planning appeal (reference APP/R5510/A03/1125/426). The proposed changes to the access achieved planning consent at the appeal with full support from the Local Planning Authority and the Planning Inspectorate. Statutory objections were received from Transport for London which were dismissed by the Inspector.

1.5 Despite achieving planning consent, the A4 Bath Road access was not implemented, and the planning permission lapsed.

1.6 Consequently, in 2010 an application was submitted to renew the permission for the access onto the A4 Bath Road (application reference 41632/APP/2010/2301). This application was approved on the 4th February 2011, however the access was again not implemented and so the permission lapsed in 2014.

1.7 Most recently, a pre-planning advice application was made in 2018 (reference 41632/4/PRC/2018/249), in relation to a new vehicular access for the NCP car park identical to that previously submitted in 2010 that received planning consent.

1.8 Similarly, to the previous applications which ultimately gained consent, TfL have rejected the proposals. In a letter dated 24th September 2018, they outlined the following transport related concerns:

- Highways conditions – Steady rise (save one year's plateau) of the daily average traffic count since 2012. It is also assumed cycle flows on the A4 carriageway and segregated path have increased as much as background levels in Greater London;
- Highways Safety – Proximity to a bus stop (visibility concerns, conflict with buses);
- Highways Safety – Lack of acceleration and deceleration lanes (may cause congestion or force drivers to illegally use the bus lane rather than move directly into offside lane);
- Highways Safety – Proposed design cuts through vehicle restrain barrier (protects vehicles from crashing onto M4 spur or colliding with pedestrians and cyclists);
- Walking and Cycling – Cyclists and Pedestrians will be required to cross a wide bell-mouth formed by the new access and associated turning radii.

1.9 This transport statement will therefore address these concerns within the following sections:

- Site Description, Access Proposals and Vehicle Routing
- Existing Traffic Generation
- Junction Capacity
- 2018 Pre-application Response
- Summary and Conclusions

2 Site Description, Access Proposals and Vehicle Routing

Site Description

2.1 The application site is an NCP run car park for Heathrow Airport travellers, located immediately northwest of where the M4 spur passes under the A4 Bath Road in West Drayton.

2.2 There are 630 vehicle spaces and 4 spaces for disabled users on the site; this parking level will not be altered as a result of the proposals.

2.3 A shuttle bus operates every 20 minutes from 4am to 11:40pm between the site and Terminals 2 and 3. Access to the other terminals can be gained from T2&3 via inter-terminal shuttle trains.

Existing Access and Adjacent Highway

2.4 The primary access to the site is via a narrow, single way working bridge over the M4 spur road. This is accessed via a road that runs adjacent to the western side of the Park Inn Radisson Hotel. Access to the Radisson Hotel is gained from the Sipson Road / A4 / Nene Road/ M4 Spur signal junction and a priority junction on the A408 Sipson Road.

2.5 A secondary access for emergency vehicle use only is located on the western boundary of the site onto Sipson Way.

2.6 The A4 Bath Road is a primary route into London and also serves as a major distributor to London's Heathrow Airport. Adjacent to the site, the A4 is a dual carriageway with a central reserve. Across the site frontage in an eastbound direction there is a combined bus, cycle and taxi lane as well as a single traffic lane. Westbound across the site frontage there are two all traffic lanes. Adjacent to the eastbound carriageway a segregated 3.5-metre-wide footway and 2.2-metre-wide cycleway is also provided.

2.7 Street lighting is provided on this section of the A4 and the carriageway is subject to a 50-mph speed limit. The A4 has been designated a Red Route Clearway, with no stopping allowed in this area.

2.8 Approximately 50 metres prior to the signal junction of the A4 with Sipson Road, the eastbound bus/cycle/taxi lane ends and three lanes are provided at the stop line. These comprise a dedicated right turn lane to Nene Road, a dedicated ahead lane to the A4 and a combined ahead and left turn to the A4 and Sipson Road. Adjacent to the western arm of the A4 at this junction is the M4 spur off-slip which comprises two lanes.

2.9 The Sipson Road arm of this signal junction comprises a single all movements lane, while the eastern A4 arm comprises a dedicated right turn lane, a dedicated ahead lane and a combined ahead and left turn lane. Nene Road, the southern arm of this junction comprises three lanes, a left turn, right turn and ahead lane. The A4 and Nene Road arms feature dedicated cycle waiting boxes at the traffic lights.

2.10 Sipson Way bordering the west of the site Way serves primarily residential units and is subject to a 30mph speed limit. Sipson Way is a controlled-parking zone between 8am and 10pm on all days and parking along the majority results in sections working as a single lane. The carriageway and footway are subject to regular street lighting.

2.11 Visibility to the west for drivers exiting Sipson Way is in excess of 2.4m x 160m.

Accident Data

2.12 Accident statistics have been obtained from Transport for London covering the section of the A4 immediately adjacent to the site and Sipson Way for the 3-year period before August 2020.

2.13 The full statistics and an analysis of them are contained in **Appendix A** of this assessment.

2.14 Only 6 incidents were recorded and the analysis found a very low severity of collisions, with 100% of incidents classified as slight.

2.15 The development proposals are unlikely to materially affect the level of accidents recorded on the local highway network, with further detail on this provided in section five of this Transport Statement.

Site Access Proposals

2.16 Presently, the existing site access is concealed behind the Park Inn Radisson Hotel, which can be confusing for drivers attempting to find the NCP car park, which has no obvious presence on any existing approach to the site.

2.17 The problems associated with signing to the car park inevitably leads to extended journeys as drivers search to find the site. In addition, the existing access arrangements are clearly unsatisfactory from a highway safety perspective as drivers search for the site access will not be giving their full attention to local road conditions at a busy interchange on the A4 Bath Road.

2.18 It is therefore proposed to improve the site access through the provision of a single junction onto the A4 Bath Road. The junction will comprise a left-in/left-out priority arrangement located on the eastern side of the site frontage with the A4. The junction layout proposals and full site plan are illustrated in **Appendix B** appended hereto and are similar to the layout of the Sipson Way/A4 junction located immediately to the west.

2.19 The proposed access will require a short break in the eastbound dedicated bus lane to allow entry and exit for the site access. The break has been kept to a minimum, to ensure that it will not adversely affect the operation of the bus lane.

2.20 Tracking drawings demonstrating that the proposed access can be safely used by a medium sized car, minibus, HG rigid vehicle and 16.5m articulated vehicle are illustrated in **Appendix C**. All drawings show that a vehicle can safely access and egress the offside lane when utilising the proposed access.

2.21 The proposals also include extending the 40mph speed limit on the A4 up to Sipson Way. Currently, this section of the A4 Bath Road is subject to a 50mph speed restriction until approximately 50m before the Bath Road / Sipson Road / Nene Road Junction, where the speed restriction becomes 40mph.

2.22 It is proposed to place new 40mph signs at the Sipson Way junction as shown in **Appendix D,** extending the 40mph speed limit by just 320m.

2.23 An extension of the 40mph speed limit by 320m could result in an extended journey time of just 3.6 seconds in comparison to a 50mph speed limit (320m at 50mph would take 14.4 seconds, 320m at 40mph would take 18 seconds), and therefore will have a negligible impact on road users of the A4 in this location for anyone travelling at the maximum speed limit.

2.24 Notwithstanding the above, an ATC survey was conducted in July 2019 adjacent to the site. Full results are located in **Appendix E** which demonstrate an 85th percentile speed of 38.4mph for eastbound vehicles.

2.25 It is therefore clear that vehicles are already driving at or below a 40mph speed in this location and thus extending the speed limit to Sipson Way will have a very minimal impact on the operation of A4 Bath Road and essentially formalises what happens at present on the A4 in terms of vehicles speeds.

Vehicle Routing

2.26 The existing site access serves both customer vehicles, generally cars, and also the midi-sized shuttle buses that transport customers from the site to the various airport terminals. Customers currently arrive from all directions to the site, accessing the car park either via the M4 off-slip or the Sipson Road/A4 signal junction. Buses are currently routed from the site via the Sipson Road (northern arm) of the Sipson Road signal junction to undertake a circuit of the airport terminals and return via the Nene Road (southern arm) of the signal junction.

2.27 As part of the proposed access improvements, the existing access via the Radisson Hotel will be closed. The proposed new access will mean that customers approaching the site from the west will turn left into the site from the A4. Customers arriving at the site from the east will 'U-turn' at the West Ramp / Newbury Road /Newport Road roundabout so as to also use the left slip into the site. Similarly, customers exiting the site wishing to travel west will 'U-turn' at the East Ramp/Nene Road roundabout.

2.28 Presently, shuttle buses operating between the site and Terminals 2 and 3 must use the A4/Sipson Road/Nene Road traffic signal junction to access the Nene Road Roundabout from which the buses will then undertake a circuit of the airport terminals. When returning to the site, buses will utilise the Northern Perimeter and New Road roundabout to turn onto the A4, before turning left at the A4/Sipson Road/Nene Road traffic signals to access the hotel service road.

2.29 Under the proposed improvements, shuttle buses will turn left from the site, travelling eastbound. At the A4/Sipson Road/Nene Road traffic signal junction, buses will turn right and undertake a circuit of the airport terminals and will return to the site via the Northern Perimeter Road and New Road, turning onto the A4 to the west of the site via the Newport Road/A4 signal junction, allowing the buses to turn left into the site.

2.30 Therefore, in addition to the general benefits of reducing driver confusion, the proposals provide the opportunity to halve the number of bus movements utilising the A4/Sipson Road/Nene Road junction.

3 Existing Traffic Generation

3.1 The site is currently used as a long stay car park catering for holiday makers and business travellers, accommodating 634 vehicles.

3.2 There are two main generators of traffic on the site namely the car park customers and the courtesy shuttle buses that transports passengers to the nearby airport terminals.

3.3 Traffic surveys on the A4 Bath Road and Hotel Service Road were carried out by 360TSL between the 2nd and 8th July 2019.

A4 Bath Road

3.4 The peak eastbound flows for the A4 were recorded between 09:00-10:00 during the morning and 18:00-19:00 during the evening.

3.5 The average weekday traffic flows associated with the morning and evening peak hours as well as the total daily flows are illustrated in **Table 3.1** below, with full survey data located in **Appendix E**.

	AM Peak 9:00-10:00	PM Peak 18:00-19:00	Daily Flows (00:00-24:00)
AAWT	581	613	9,766

Table 3.1: 2019 Existing A4 Bath Road Traffic Flows

NCP Car Park Access

3.8 Due to the nature of the existing development and its relatively low traffic generation, the critical peak hours have been determined based on the adjacent A4 Bath Road. Peak weekday and daily flows for the Hotel Service Road providing access to the car park are presented in **Table 3.2** below:

	AM Peak (09:00-10:00)		PM Peak (18:00-19:00)		Daily Flow (00:00-24:00)	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
AAWT	10	9	4	7	132	132

Table 3.2: 2019 Existing Traffic Flows along NCP Access Road

3.9 It is clear from the above tables that the site attracts a negligible level of traffic during both peak hours in comparison to the traffic flows associated with the A4.

4 Junction Capacity

4.1 As already stated, the traffic generated by the existing car park operation already accesses the A4 via the Park Inn Radisson Hotel, therefore there will be no new traffic on the network. It is proposed that the level of this traffic will not change but will access the A4 via a purpose built left in/left out junction, with a minor associated redistribution on the local network.

4.2 The proposals will have no effect on the traffic attraction of the car park site and therefore will not result in any additional traffic on the adjacent highway network. As set out previously, the level of traffic associated with the site in the morning and evening peak periods is negligible, especially bearing in mind the level of traffic on the A4 in these peak periods. The proposals therefore have no impact on the adjacent highway in terms of vehicle numbers.

4.3 While there is no impact in terms of vehicle numbers on the A4, in order to provide a robust assessment a capacity assessment of the proposed site access arrangement has been undertaken. The junction capacity has been assessed for the weekday morning and evening peak hours using the TRL Junctions 9 software, which is the generally accepted method of junction capacity assessment of priority junctions.

4.4 Traffic flows from the 2019 ATC survey were used and growthed to 2021 flows using TEMPRO so that the modelling would be robust.

4.5 Utilising surveyed traffic flows, the Junctions 9 model is capable of calculating a Ratio of Flow to Capacity (RFC) to determine the anticipated performance of a junction. A priority junction with a calculated RFC of 1.0 is considered to have reached its theoretical capacity.

4.6 The junction capacity results are summarised in **Table 4.1 and 4.2** below and the full output files are contained in **Appendix F**.

Arm	AM Peak	
	Max. RFC	Max Queue
Site Access	0.02	0.0
A4 Bath Road Eastbound	0.00	0.0

Table 4.1: Junction Capacity Results AM Peak

Arm	AM Peak	
	Max. RFC	Max Queue
Site Access	0.01	0.0
A4 Bath Road Eastbound	0.00	0.0

Table 4.2: Junction Capacity Results PM Peak

4.7 It can be seen from the above tables that the proposed access will operate well within capacity during both the AM and PM peaks and will have a negligible impact on the A4 Bath Road in terms of capacity or queuing.

5 Pre-application Response

5.1 This section will outline responses to the transport concerns TfL raised in the 2018 pre-application discussion relating to the proposals. A full copy of the letter received from TfL is located in **Appendix G**.

Increase in Traffic Flows

Vehicle Flows

5.2 TfL stated in their pre-application response the following text:

"Your proposal for a new access will be assessed in the context of more challenging, peak-time congested conditions than in 2010 let alone 2004 and the steady rise (save one year's plateau) of the daily average traffic count since 2012".

5.3 The Department for Transport (DfT) provide road traffic statistics collected over the last 18 years at 44,911 manual count points across the UK. A manual count point is located on the A4 Bath Road, approximately 530m east of the proposed new access.

5.4 **Table 5.1** below presents the total daily motor vehicle counts in an eastbound direction at this count point between 2002 (when the first application for this access was approved) and 2019. Stars are placed by years that have been estimated by the DfT rather than manually counted.

Year	Daily Total Motor Vehicles	Difference with 2002 Figure
2002	15,933	-
2003*	15,849	-84
2004*	16,080	147
2005	14,836	-1,097
2006*	15,096	-837
2007*	14,971	-962
2008*	14,655	-1,278
2009	21,638	5,705
2010*	21,160	5,227
2011	12,428	-3,505
2012*	12,225	-3,708
2013	12,538	-3,395
2014*	12,539	-3,394
2015*	12,488	-3,445
2016*	12,369	-3,564
2017	10,865	-5,068
2018*	10,829	-5,104
2019*	10,857	-5,076

Table 5.1: Manual Count Point Data on the A4 Bath Road

5.5 **Table 5.1** clearly indicates a reduction in traffic flows over the last two decades, with only a few years within this time seeing an increase. Between the original application in 2002 and now, traffic flows have reduced by 5,067 counts in the eastbound direction.

5.6 **Table 5.1** also indicates that traffic flows had temporarily increased to 21,638 in 2009 and 21,160 in 2010 before dropping again. Therefore, traffic flows have decreased by 10,303 counts in comparison to when the 2010 planning application was approved.

5.7 In regard to the claim by TFL that traffic levels have steadily risen since 2012, **Table 5.1** illustrates that traffic levels have steadily decreased over this time period and thus traffic conditions in this location have only got better.

5.8 Additionally, for each application, an independent traffic survey was done on the A4 Bath Road eastbound, in proximity to the proposed vehicle access. The AADT results from these surveys are presented in **Table 5.2** below with full survey data located in **Appendix E**:

	July 2000	October 2010	July 2019
AADT	14,069	8,156	9,333

Table 5.2: Traffic Survey Results for 2000, 2010 and 2019 on A4 Bath Road

5.9 **Table 5.2** indicates a significant drop in eastbound traffic levels between 2000 and 2019 of 4,736 vehicles.

5.10 Therefore, both the DfT manual traffic point data and independent survey data indicate a significant decrease in traffic counts along this stretch of the A4 Bath Road since the original planning application was approved. Additionally, the DfT count point data show a continued decrease in flows at this location since 2012, thus indicating that TfL's claim of a steady increase in AADT since 2012 is unfounded.

Cycle Flows

5.11 TfL also suggest that *"cycle flows on the A4's carriageway and its segregated path have increased at least as much as background levels in Greater London, which during the period from 2000 to 2012 experienced a doubling in the number of daily journeys made by bicycle to 580,000, and this remains the fastest-increasing mode of transport."*

5.12 **Table 5.3** below presents the DfT manual count point data for pedal cycles at the A4 Bath Road, with estimated years highlighted by a star.

Year	Daily Pedal Cycle Count	Difference with 2000 Count
2000*	32	-
2001*	35	+3
2002	52	+20
2003	38	+6
2004	33	+1
2005	58	+26
2006*	37	+5
2007*	48	+16
2008*	56	+24
2009	0	-32
2010*	0	-32
2011	5	-27
2012*	4	-28
2013	52	+20
2014*	59	+27
2015*	67	+35
2016*	70	+38
2017	51	+19
2018*	50	+18
2019*	47	+15

Table 5.3: Manual Count Cycle Flows on A4 Bath Road

5.13 **Table 5.3** indicates that between the year 2000 and 2012, cycle counts in this location decreased by 87.5% and thus did not experience the doubling seen across the rest of Greater London noted by TfL.

5.14 However, between 2000 and 2019**,** cycle counts in this location did increase by 32% from 32 to 47. However, 47 cycles a day equates to approximately 2 cycles per hour across a 24-hour period which does not constitute a high use of this facility.

5.15 For context, a nearby cycle superhighway (CS7) on Clapham High Street (A3) had a manual count of 3508 pedal cycles in 2018, which equates to approximately 146 cycles per hour in a 24-hour period. Therefore comparably, the cycle facilities on the A4 adjacent to the proposed site are very lightly trafficked.

5.16 Cycle flows in this location are therefore not considered to be of a significant level.

Lack of Acceleration and Deceleration Lanes

5.17 TfL noted that "*The DMRB states acceleration/deceleration lanes should be provided for roads where the design speed for the A road is 85kph (53mph) or above. Therefore, whilst Bath Road is just under that speed I think in this scenario with the bus lane it could benefit from it".*

5.18 The proposals include extending the 40mph speed limit to the Sipson Way junction, approximately 60m to the west of the proposed site access.

5.19 ATC results from 2019 demonstrate an 85th percentile speed on the A4 eastbound of 38.4mph (full results located in **Appendix E)**, therefore the extension of the 40mph speed limit will essentially formalise what presently occurs with regard to vehicle speeds.

5.20 Guidance contained in the Design Manual for Roads and Bridges CD123 'Geometric design of at-grade priority and signal-controlled junctions' document sets out that nearside diverging tapers, merging tapers and auxiliary lanes shall not be provided where the design speed of the major road is less than 85kph.

5.21 The A4 in proximity to the junction will be 40mph which equates to a design speed of 70kph and thus will be well under the threshold requiring a nearside diverging taper.

Proximity to Bus Stop

5.22 TfL raised concerns that the proximity of the access to the existing bus stop will affect visibility of those exiting and pose a risk of conflict with buses pulling away at the same time.

5.23 The Design Manual for Roads and Bridges CD109 'Highway link design' document sets out permitted stopping site distances according to the design speed of the road. The A4 in this location will be subject to a 40mph speed restriction which is a 70kph design speed and thus a stopping sight distance of 120m will be required.

5.24 Visibility splays located in **Appendix H** demonstrate that a 120m visibility splay can be achieved from the proposed access, clear of the bus cage. This allows for safe manoeuvres and therefore there will not be an increased collision risk as a result of the proposals.

5.25 Additionally, TfL note in their Accessible Bus Stop Guidance Document (2017) that a bus using a bus stop is a temporary obstruction and that it is the furniture associated with a stop (for example the shelter, post or flag) that should not unduly obscure sight lines. No furniture associated with the bus stop is present in the visibility splay from the proposed junction.

Design Cuts Through Safety Barrier

5.26 In the pre-app response, TfL stated that *"The original design (entrance/exit to the east) cuts through the vehicle restraint barrier (crash barrier) and so part of the barrier would need removing, but it is queried whether this would open up a safety concern that the barrier had previously solved (i.e vehicles crashing onto the M4 Spur Road, damaging the bridge structure and/or colliding with pedestrians and cyclists)."*

5.27 The updated design of the proposed access, located in **Appendix B**, no longer cuts through the existing vehicle restraint barrier which can be left in-situ.

Walking and Cycling

5.28 TfL raised concerns regarding walking and cycling for three reasons, firstly that the removal of the safety barrier would remove protection for vulnerable road users which they viewed as *"unacceptable"* and secondly, that the new access would require cyclists and pedestrians to cross a *"wide bell-mouth formed by the new access"*. Thirdly it was identified that *"The 2011 RSA noted that no provision is made to indicate the presence of the access to pedestrians, increasing the potential for conflict with vehicles ingressing and egressing".*

5.29 As the updated design does not require removal of the safety barrier, there is no longer a safety concern regarding vulnerable road users in relation to this.

5.30 Furthermore, the proposed LILO junction is designed very similarly to the LILO junction at Bath Road / Sipson Way, immediately to the west of the site. Both pedestrians and cyclists are able to navigate this junction without any safety concern, as demonstrated by the fact that there have been no incidents involving a pedestrian at this junction in the last 3 years (further detail on accidents in the local area is located in **Appendix A**).

5.31 While outside of the accident data study area, many other junctions along this side of the A4 Bath Road also feature wide bell-mouth crossings that pedestrians and cyclists safely navigate, for example Heathrow Boulevard and Airport Gate to the west of the site. Therefore, it is not believed that the proposed access poses a safety concern for vulnerable road users given the operation of the adjacent infrastructure.

5.32 Finally, the updated design included in **Appendix B** includes tactile paving at both the ingress and egress and on the centralised island, indicating the presence of an access to pedestrians.

Summary

5.33 This section has demonstrated the following:

- Between 2002 and 2019, traffic flows on the A4 Bath Road have reduced by 5,067 counts in the eastbound direction according to DfT's manual traffic counts. Between 2012 and 2019 flows have reduced by 1,368 vehicles, directly opposing the claim by TfL that traffic flows have steadily increased since 2012.
- ATC data collected in 2000, 2010 and 2019 also demonstrates a significant drop in traffic levels on the A4 eastbound carriageway of 4,736 vehicles.
- A DfT count point in close proximity to the site estimated 47 daily cyclists in 2019 which equates to two per hour across a 24 hour time period, indicating cycle flows in this location are not considered to be at a significant level.
- Visibility splays demonstrate sufficient visibility can be achieved from the proposed junction without being obscured by buses sitting in the nearby bus gate.
- Accident data demonstrates that there is likely very little safety concern for vulnerable road users in this location. The LILO junction at Sipson way operates very similarly to the proposed access and both cyclists and pedestrians are able to navigate this safely.

6 Summary and Conclusions

6.1 Mayer Brown Limited has prepared this Transport Statement in respect of a proposed new access at the existing NCP car park to the west of the Park Inn Radisson Hotel, Heathrow.

6.2 The proposals seek to provide direct vehicular access from the site onto the A4 Bath Road in the form of a simple left-in/left-out (LILO) junction, a concept which has been secured in two previous planning applications.

6.3 This report finds the following:

- The proposals will not affect the traffic attraction of the development site and are only required to improve the convenience and serviceability for customers and the associated bus service of the NCP car park. As a result the proposed improvements will not have an impact on the adjacent highway network in terms of vehicle numbers;
- Capacity tests indicate that the proposed access arrangements will operate well within capacity in the critical morning and evening peak periods;
- Tracking drawings provided highlight that the junction can be safely used by vehicles ranging from a medium car to a 16.5m articulated vehicle;
- Accident records obtained from TfL indicate a low severity ration of collisions and there is no evidence to suggest the proposals will materially impact the level of accidents in the local area;
- The updated design requires no removal of any portion of the existing vehicle restraint barrier on the A4 Bridge and thus no longer provides a safety concern for vulnerable road users; and
- The LILO junction design is very similar to the adjacent LILO junction at Sipson Way, which is safely navigated by pedestrians and cyclists as demonstrated by the accident records. Therefore, the proposed junction is not a safety concern for vulnerable road users.

6.4 It is therefore considered that the proposed improvements will have no detrimental effect on the adjacent highway network and thus the application should not be refused on transport grounds.

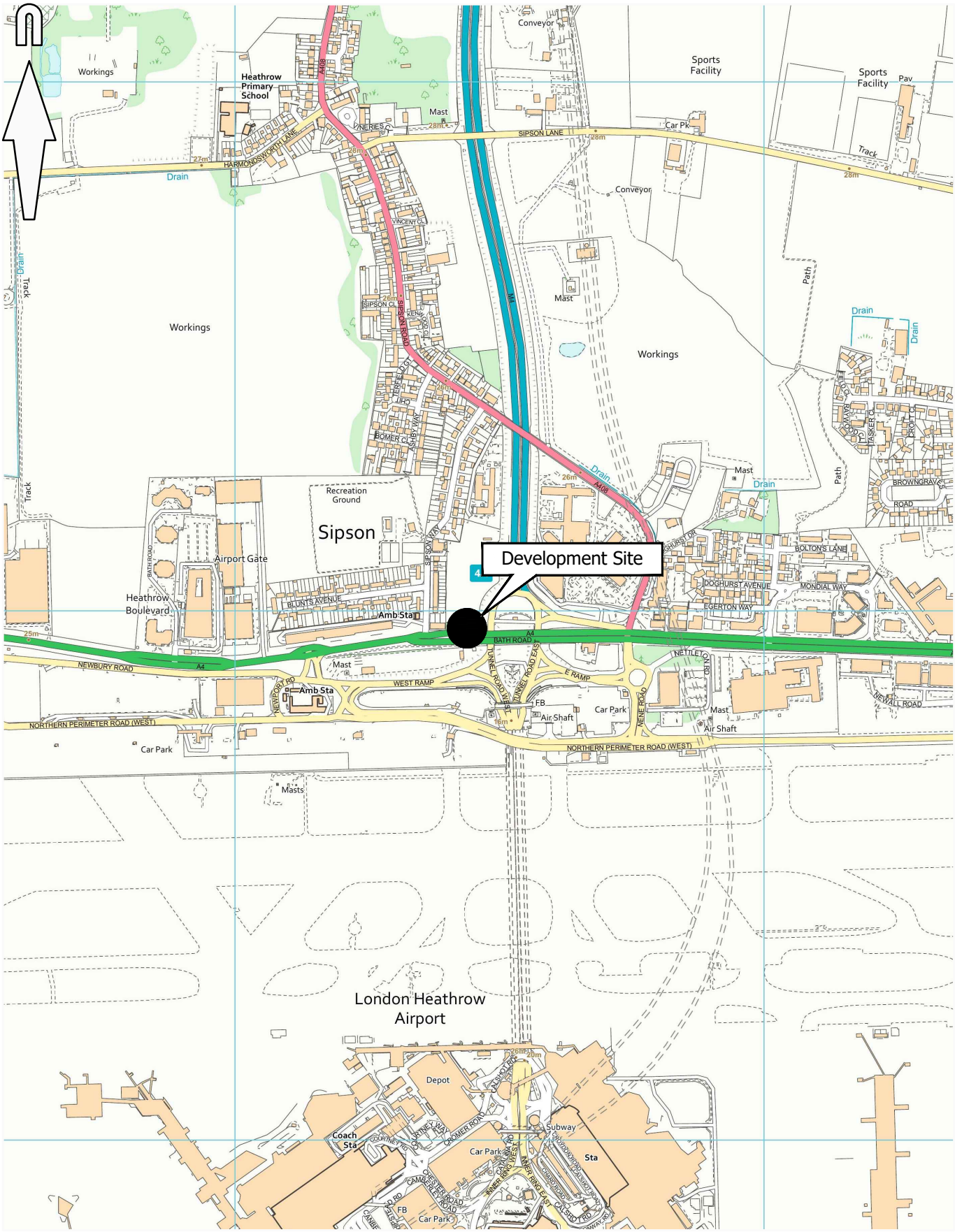
This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Mayer Brown Ltd. Licence No - AL 100002189

mayer brown

Site in Relation to the Regional Highway Network

Scale 1:50 000

Figure 1.1



This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Mayer Brown Ltd. Licence No - AL 100002189

mayer brown

Site in Relation to the Local Highway Network

Scale 1:10 000

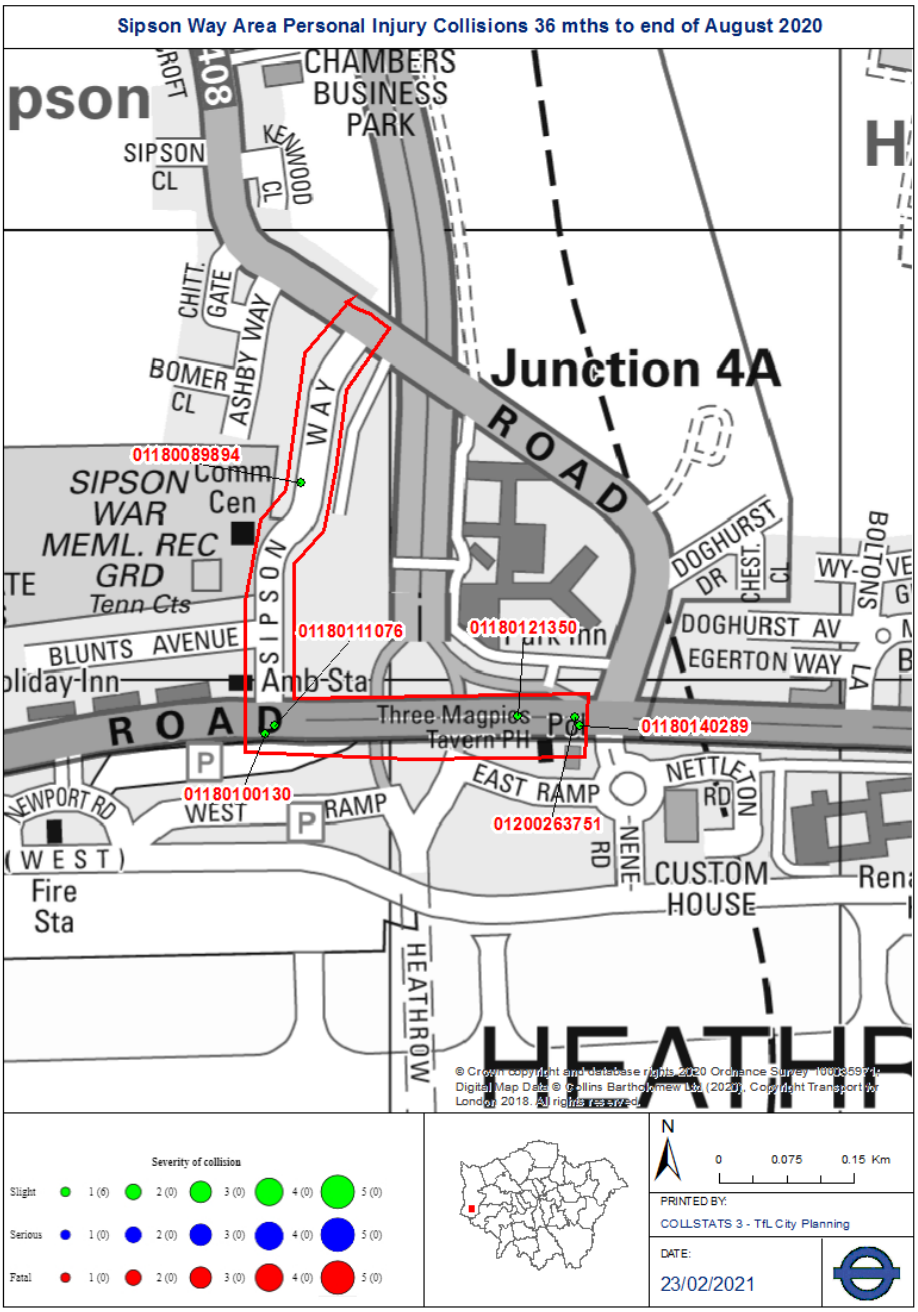
Figure 1.2

APPENDIX A: Accident Statistics and Analysis

A4 BATH ROAD AREA STUDY – ACCIDENT ANALYSIS

Accident records have been obtained from Transport for London for the three year period between August 2017 and August 2020. It is beyond the scope of this study to provide comparative analysis with similar London Borough locations.

The accident plots are outlined in the figure below:



The study area includes Sipson Way and a section of the A4 Bath road between Sipson Way and Sipson Road. Sipson Way is a residential street subject to a 30mph speed limit, while this stretch of the A4 is a dual carriageway subject to a 50mph speed limit.

Throughout the study area as a whole, six slight accidents were recorded during the three-year period, a very low severity ratio.

Statistical information provided also indicated that:

- Only one incident involved a pedestrian, equating to 17% of the accident total.
- One incident occurred during wet/damp conditions, equating to 17% of the accident total.
- Two accidents occurred at the Bath Road / Sipson Way Junction (33% of total).
- Two accidents occurred at the Bath Road / Sipson Road / Nene Road Junction (33% of total).
- No incidents involved a cyclist.
- One incident involved a London Bus.
- There is no evidence that there has been an increase in accidents during the study period.

While the cause of the accident involving the pedestrian is not recorded, it is stated that the vehicle involved was reversing. Therefore, this location does not provide a safety risk for vulnerable road users.

The Bath Road / Sipson Road / Nene Road Junction is a major junction with high volumes of traffic passing through each day. Therefore, the small number of incidents recorded at this location is not unexpected and do not pose a highways safety concern.

The official causes of the incidents at the Bath Road / Sipson Way Junction are not recorded, however it is possible to identify that one incident involved a vehicle and a goods van >7.5T colliding as the vehicle turned left out of the junction. The details of the other incident are unknown. Again, given the volumes of traffic on the A4 each day, the small number of incidents at this junction over a three-year period do not pose a highways safety concern.

Bath Road/Sipson Way Personal Injury Collisions 36 mths to end of August 2020 Provisional

SUMMARY OF COLLISIONS SELECTED

SITE REFERENCE AND DESCRIPTION	DATE PERIOD	ACCIDENT COUNT
A4 BATH ROAD/SIPSON WAY GIS AREA B26 - A4 BATH ROAD/SIPSON WAY AREA(P)	36MTS TO AUG/2020	6

THE DESCRIPTION OF HOW THE COLLISION OCCURRED AND THE CONTRIBUTORY FACTORS ARE THE REPORTING OFFICER'S OPINION AT THE TIME OF REPORTING AND MAY NOT BE THE RESULT OF EXTENSIVE INVESTIGATION

1

01180089894	THU 01/02/2018 11:05		LIGHT	SIPSON WAY 40M S OF J/W SIPSON RD			26 CELL 507000/177000	507400/177220
SELF-REPORTED		ROAD-DRY	WEATHER-FINE	SINGLE CWY	NO JUN IN 20M	N/A	NO XING FACIL IN 50M	NONE IN 50M
CASUALTY	001 (001)	(41 YRS - F - REDA)		SLIGHT	DRIVER/RIDER			
VEHICLE	001 (000)	CAR		(41 YRS - F - REDACT)	UNKNOWN S/R	G/AHEAD - OTHER	(S TO N) FRONT HIT FIRST	J/P - UNKN
VEHICLE	002 (000)	CAR		(? YRS - M - REDACT)		REVERSING	(S TO N) BACK HIT FIRST	J/P - UNKN

2

01180100130	THU 05/04/2018 18:10		LIGHT	BATH RD J/W SIPSON WAY			26 LINK 13-16	507360/176940
POLICE - AT SCENE		ROAD-DRY	WEATHER-FINE	DUAL CWY	T/STAG JUN	GIVEWAY /UNCONT	NO XING FACIL IN 50M	NONE IN 50M
CASUALTY	001 (001)	(42 YRS - M - REDA)		SLIGHT	DRIVER/RIDER			
VEHICLE	001 (000)	CAR		(42 YRS - M - REDACT)		G/AHEAD - OTHER	(W TO E) FRONT HIT FIRST	COMMUTING JCT APP

3

01180111076	TUE 29/05/2018 16:58		LIGHT	BATH RD J/W SIPSON WAY			26 LINK 13-16	507370/176950
POLICE - AT SCENE		ROAD-WET	RAINING	DUAL CWY	T/STAG JUN	GIVEWAY /UNCONT	NO XING FACIL IN 50M	NONE IN 50M
CASUALTY	001 (002)	(59 YRS - F - REDA)		SLIGHT	DRIVER/RIDER			
VEHICLE	001 (000)	GOODS > 7.5T		(49 YRS - M - REDACT)	ARTICULATED VEH	G/AHEAD - OTHER	(W TO E) N/S HIT FIRST	JOURNEY P/O WORK JCT APP
VEHICLE	002 (000)	CAR		(59 YRS - F - REDACT)		TURNING - LEFT	(N TO E) O/S HIT FIRST	COMMUTING E/MAIN RD

4

01180121350	MON 16/07/2018 15:37		LIGHT	BATH RD 65M W OF J/W SIPSON RD			26 LINK 13-16	507640/176960
POLICE - AT SCENE		ROAD-DRY	WEATHER-OTHER	ONE-WAY ST	NO JUN IN 20M	N/A	NO XING FACIL IN 50M	NONE IN 50M
CASUALTY	001 (001)	(39 YRS - M - REDA)		SLIGHT	PEDESTRIAN	E BOUND	UNKNOWN/OTHER	
VEHICLE	001 (000)	CAR		(? YRS - M - REDACT)		REVERSING	(N TO S) BACK HIT FIRST	J/P - UNKN

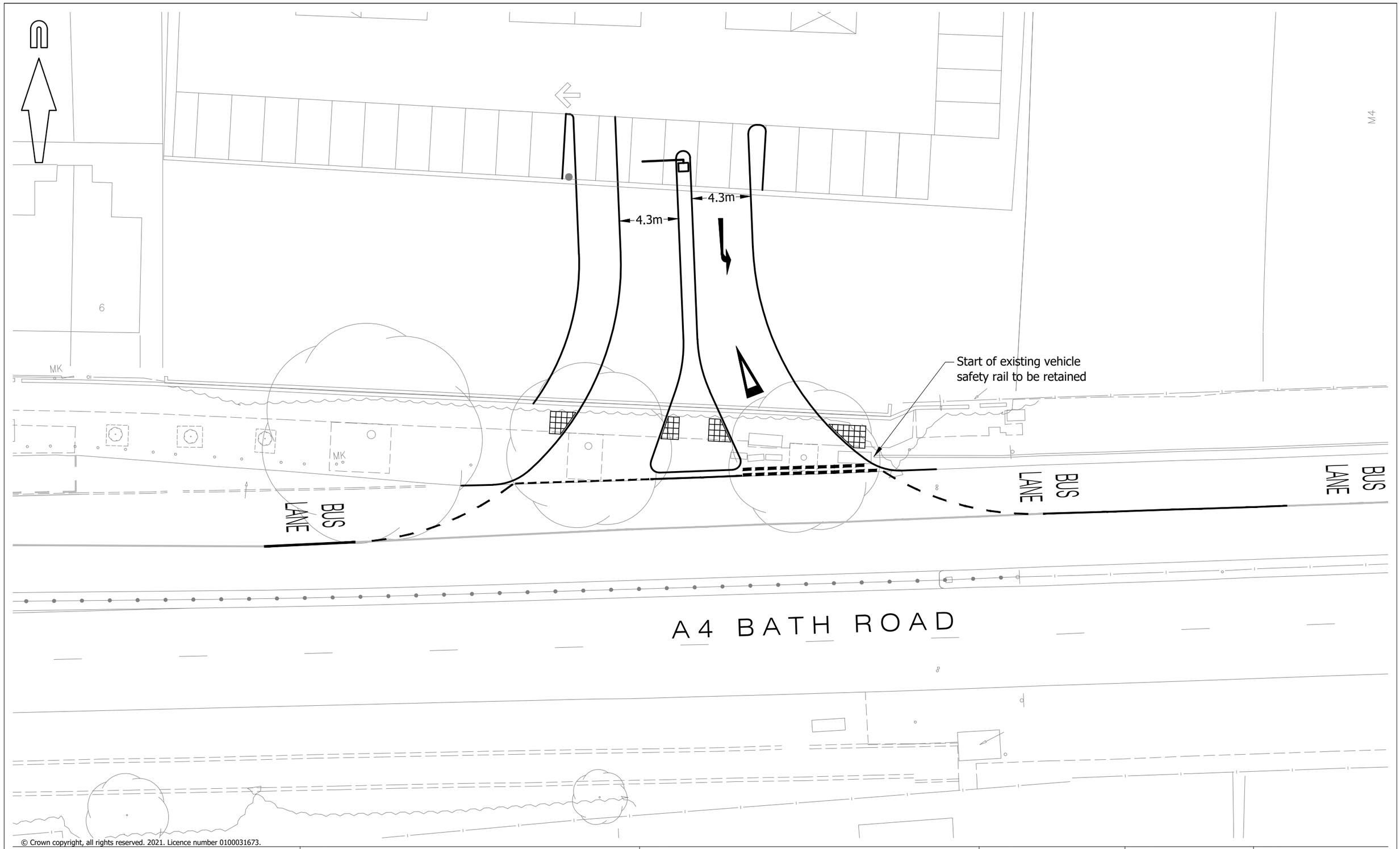
5

01180140289	SAT 20/10/2018 13:56		LIGHT	BATH RD J/W SIPSON RD			26 NODE 16	507710/176950
POLICE - AT SCENE		ROAD-DRY	WEATHER-FINE	DUAL CWY	CROSSROADS	AUTO SIG	PELICAN OR SIML	NONE IN 50M
CASUALTY	001 (001)	(48 YRS - M - REDA)		SLIGHT	DRIVER/RIDER			
CASUALTY	002 (002)	(48 YRS - M - REDA)		SLIGHT	VEH/PILLION PAX	SEATED PASSENGER		
CASUALTY	003 (002)	(34 YRS - F - REDA)		SLIGHT	VEH/PILLION PAX	SEATED PASSENGER		
CASUALTY	004 (002)	(21 YRS - F - REDA)		SLIGHT	VEH/PILLION PAX	SEATED PASSENGER		
VEHICLE	001 (000)	CAR		(48 YRS - M - REDACT)		SLOWING/STOPPING	(W TO E) BACK HIT FIRST	J/P - UNKN E/MAIN RD
VEHICLE	002 (000)	LONDON BUS		(47 YRS - M - REDACT)		G/AHEAD - OTHER	(W TO E) FRONT HIT FIRST	JOURNEY P/O WORK JCT MID

6

01200263751	SUN 23/08/2020 13:10		LIGHT	A4, NR JUNCT WTH NENE RD.			26 NODE 16	507704/176959
SELF-REPORTED		UNKNOWN S/R	WEATHER-FINE	DUAL CWY	UNKNOWN S/R	UNKNOWN S/R	PEDN PHASE ATS	UNKNOWN S/R
CASUALTY	001 (001)	(47 YRS - M - REDA)		SLIGHT	DRIVER/RIDER			
CASUALTY	002 (001)	(? YRS - UNKNOWN - REDA)		SLIGHT	VEH/PILLION PAX	FRONT SEAT PASSENGER		
VEHICLE	001 (000)	CAR		(47 YRS - M - REDACT)		UNKNOWN S/R	(MOVE UNKN) BACK HIT FIRST	UNKNOWN S/R
VEHICLE	002 (000)	CAR		(? YRS - UNKNOWN - REDACT)	UNKNOWN S/R	G/AHEAD - OTHER	(S TO N) FRONT HIT FIRST	J/P - UNKN UNKNOWN S/R

APPENDIX B: Proposed Access Layout



© Crown copyright, all rights reserved. 2021. Licence number 0100031673.

mayer brown

Mayer Brown Limited
Lion House Oriental Road Woking Surrey GU22 8AR
Telephone 01483 750 508 Fax 01483 750 437
wokingoffice@mayerbrown.co.uk www.mayerbrown.co.uk

client
HEATHROW NCP PROPERTY LTD

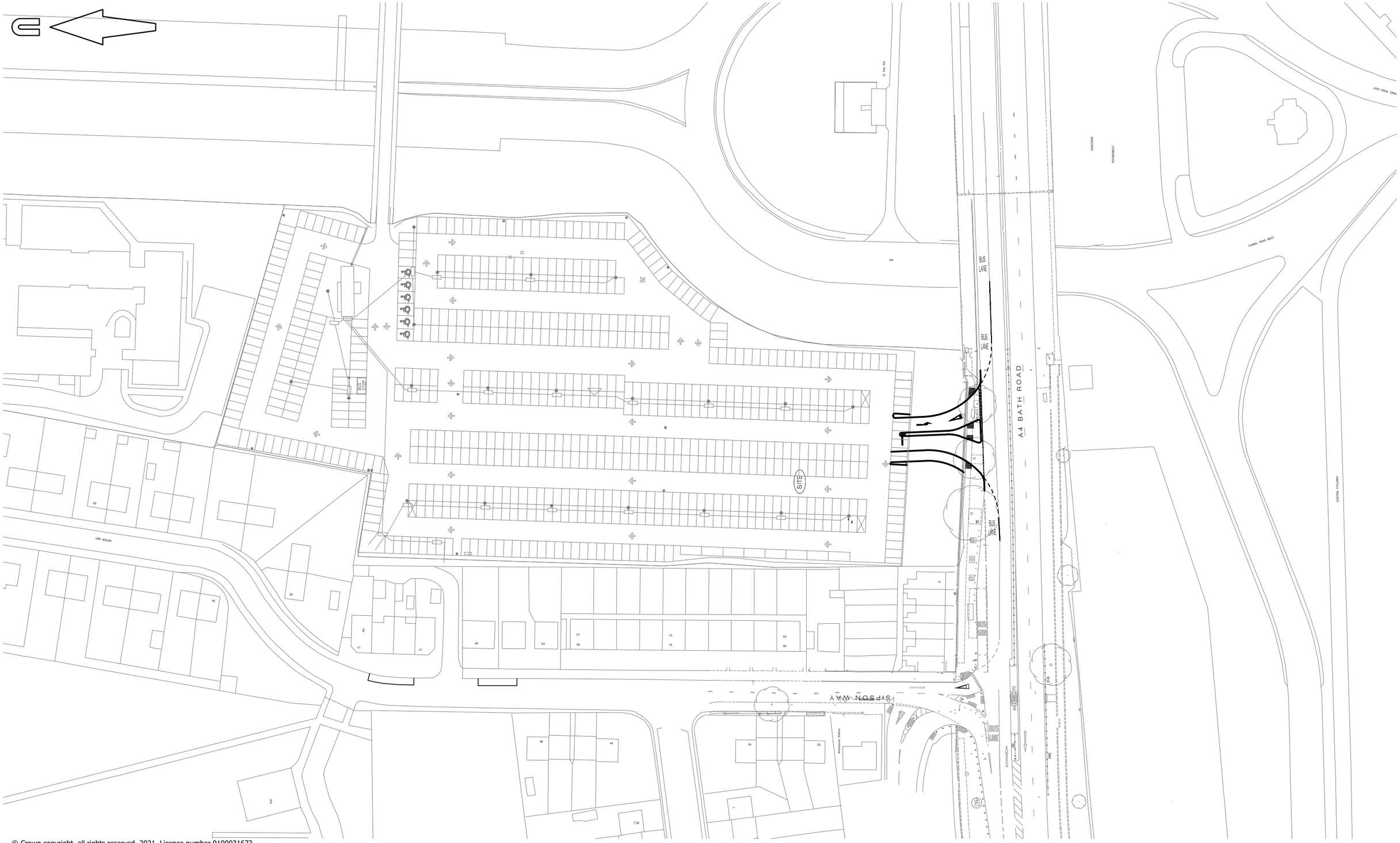
project
NCP CAR PARK, A4 BATH ROAD, HEATHROW

title
POSSIBLE NEW ACCESS ARRANGEMENT

scale	drawn by	checked by	
1:250 @ A3	JME	AP	
date	**cad file**	**suitability**	**rev.**
MAY 2021	MBSK210222		P4

drawing number
MBSK210222-01

L:_planning 7\current jobs\ncpheathrow5.1\dwgs\mbsk210222.dwg



© Crown copyright, all rights reserved. 2021. Licence number 0100031673.

mayer brown

Mayer Brown Limited
Lion House Oriental Road Woking Surrey GU22 8AR
Telephone 01483 750 508 Fax 01483 750 437
wokingoffice@mayerbrown.co.uk www.mayerbrown.co.uk

client

HEATHROW NCP PROPERTY LTD

project

NCP CAR PARK, A4 BATH ROAD, HEATHROW

title

CONTEXT PLAN

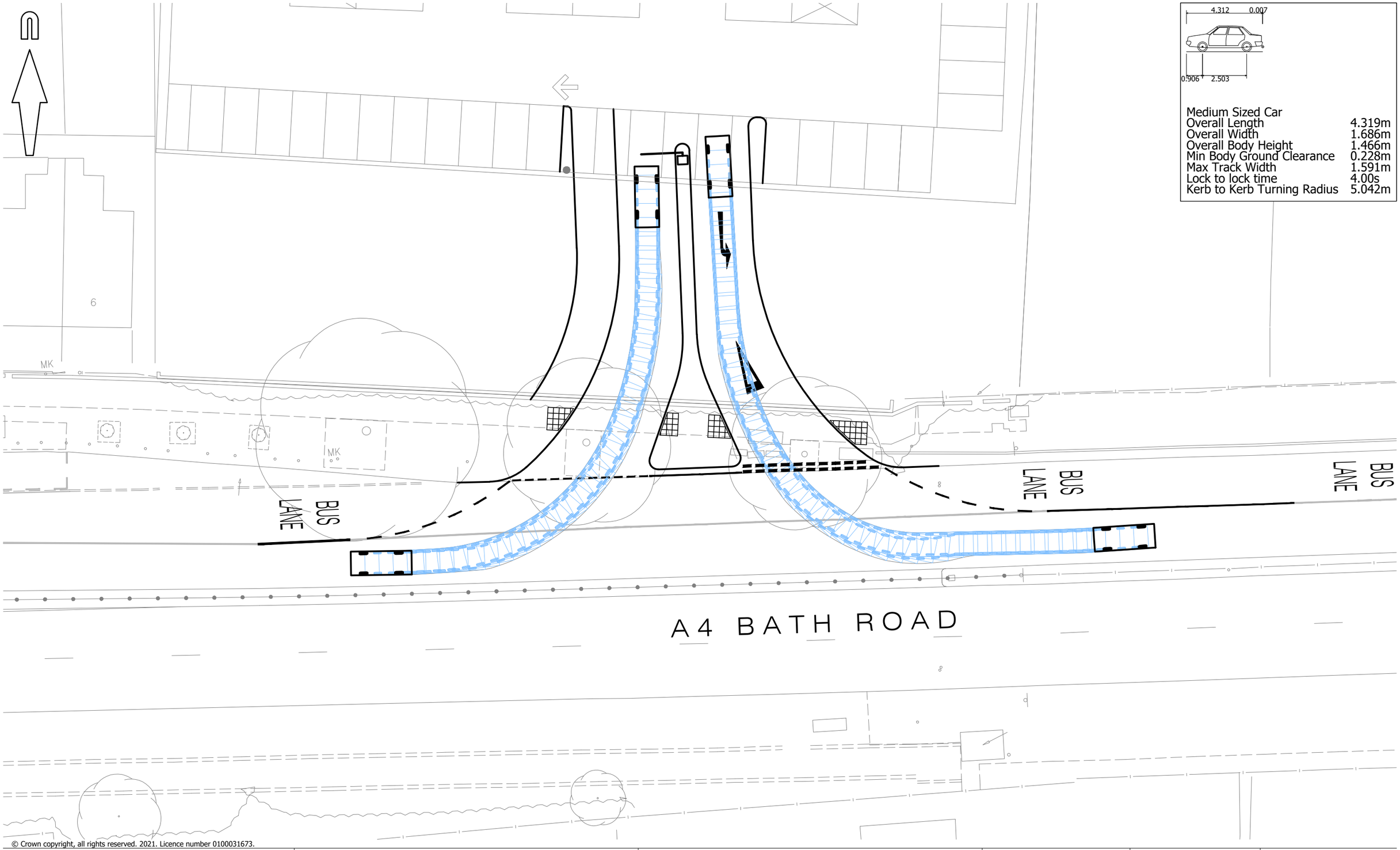
scale	drawn by	checked by	
1:1,000 @ A3	JME	AP	
date	**cad file**	**suitability**	**rev.**
MAY 2021	MBSK210222		P2

drawing number

MBSK210222-09

L:_planning 7\current jobs\ncpheathrow5.1\dwgs\mbsk210222.dwg

APPENDIX C: Tracking Diagrams



© Crown copyright, all rights reserved. 2021. Licence number 0100031673.

mayer brown

Mayer Brown Limited
Lion House Oriental Road Woking Surrey GU22 8AR
Telephone 01483 750 508 Fax 01483 750 437
wokingoffice@mayerbrown.co.uk www.mayerbrown.co.uk

client

HEATHROW NCP PROPERTY LTD

project

NCP CAR PARK, A4 BATH ROAD, HEATHROW

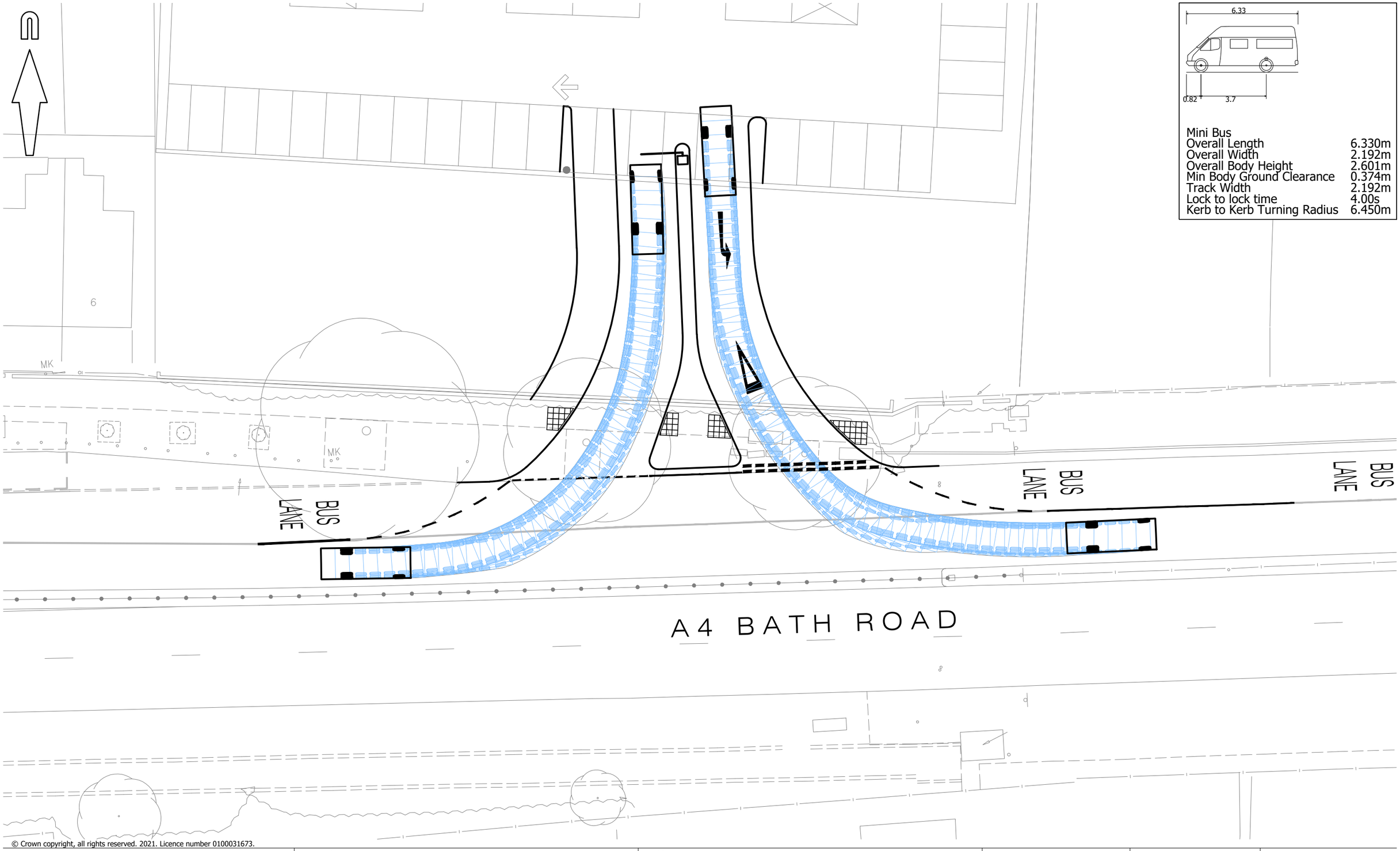
title

SWEPT PATH ANALYSIS
MEDIUM CAR ENTERING/EXITING SITE

scale	drawn by	checked by	
1:250 @ A3	JME	AP	
date	**cad file**	**suitability**	**rev.**
MAY 2021	MBSK210222		P3

drawing number

MBSK210222-03



© Crown copyright, all rights reserved. 2021. Licence number 0100031673.

mayer brown

Mayer Brown Limited
Lion House Oriental Road Woking Surrey GU22 8AR
Telephone 01483 750 508 Fax 01483 750 437
wokingoffice@mayerbrown.co.uk www.mayerbrown.co.uk

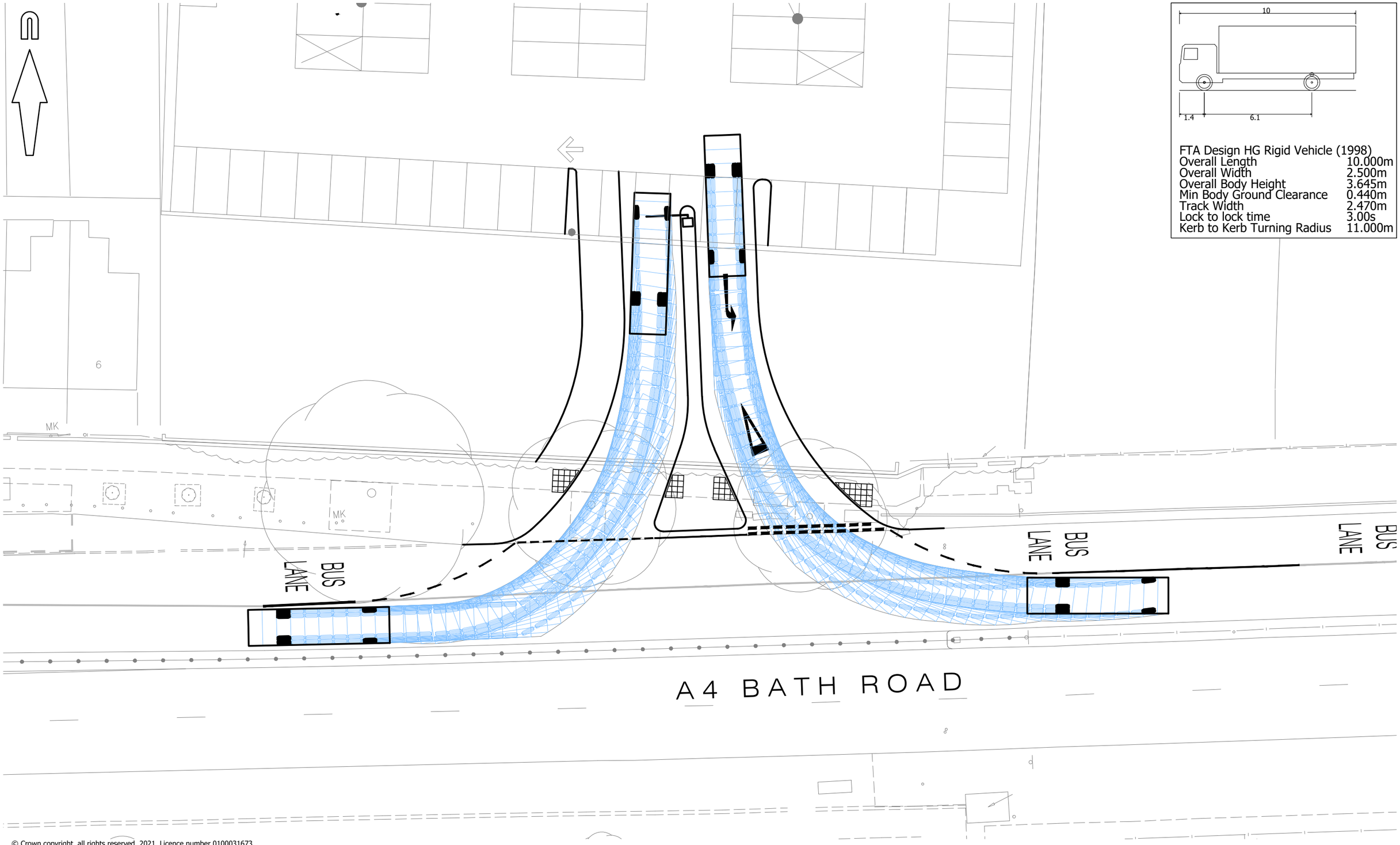
client
HEATHROW NCP PROPERTY LTD

project
NCP CAR PARK, A4 BATH ROAD, HEATHROW

title
SWEPT PATH ANALYSIS
MINIBUS ENTERING/EXITING SITE

scale	drawn by	checked by	
1:250 @ A3	JME	AP	
date	**cad file**	**suitability**	**rev.**
MAY 2021	MBSK210222		P3

drawing number
MBSK210222-04



FTA Design HG Rigid Vehicle (1998)

Overall Length	10.000m
Overall Width	2.500m
Overall Body Height	3.645m
Min Body Ground Clearance	0.440m
Track Width	2.470m
Lock to lock time	3.00s
Kerb to Kerb Turning Radius	11.000m

© Crown copyright, all rights reserved. 2021. Licence number 0100031673.

mayer brown

Mayer Brown Limited
Lion House Oriental Road Woking Surrey GU22 8AR
Telephone 01483 750 508 Fax 01483 750 437
wokingoffice@mayerbrown.co.uk www.mayerbrown.co.uk

client

HEATHROW NCP PROPERTY LTD

project

NCP CAR PARK, A4 BATH ROAD, HEATHROW

title

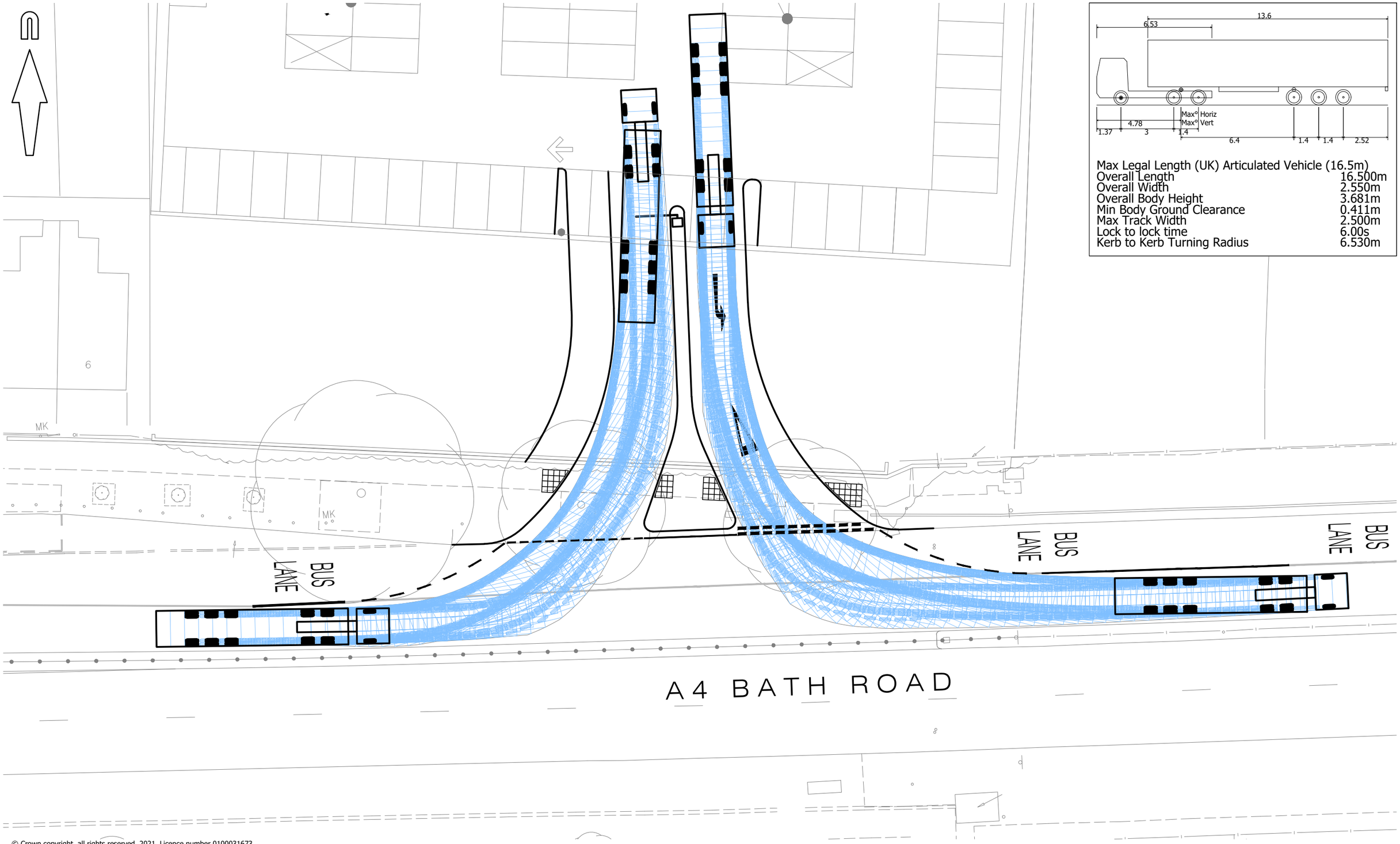
SWEPT PATH ANALYSIS
10M RIGID VEHICLE ENTERING/EXITING SITE

scale	drawn by	checked by	
1:250 @ A3	JME	AP	
date	**cad file**	**suitability**	**rev.**
MAY 2021	MBSK210222		P3

drawing number

MBSK210222-05

L:_planning 7\current jobs\ncpheathrow5.1\dwgs\mbsk210222.dwg



Max Legal Length (UK) Articulated Vehicle (16.5m)	
Overall Length	16.500m
Overall Width	2.550m
Overall Body Height	3.681m
Min Body Ground Clearance	0.411m
Max Track Width	2.500m
Lock to lock time	6.00s
Kerb to Kerb Turning Radius	6.530m

© Crown copyright, all rights reserved. 2021. Licence number 0100031673.

mayer brown

Mayer Brown Limited
Lion House Oriental Road Woking Surrey GU22 8AR
Telephone 01483 750 508 Fax 01483 750 437
wokingoffice@mayerbrown.co.uk www.mayerbrown.co.uk

client
HEATHROW NCP PROPERTY LTD

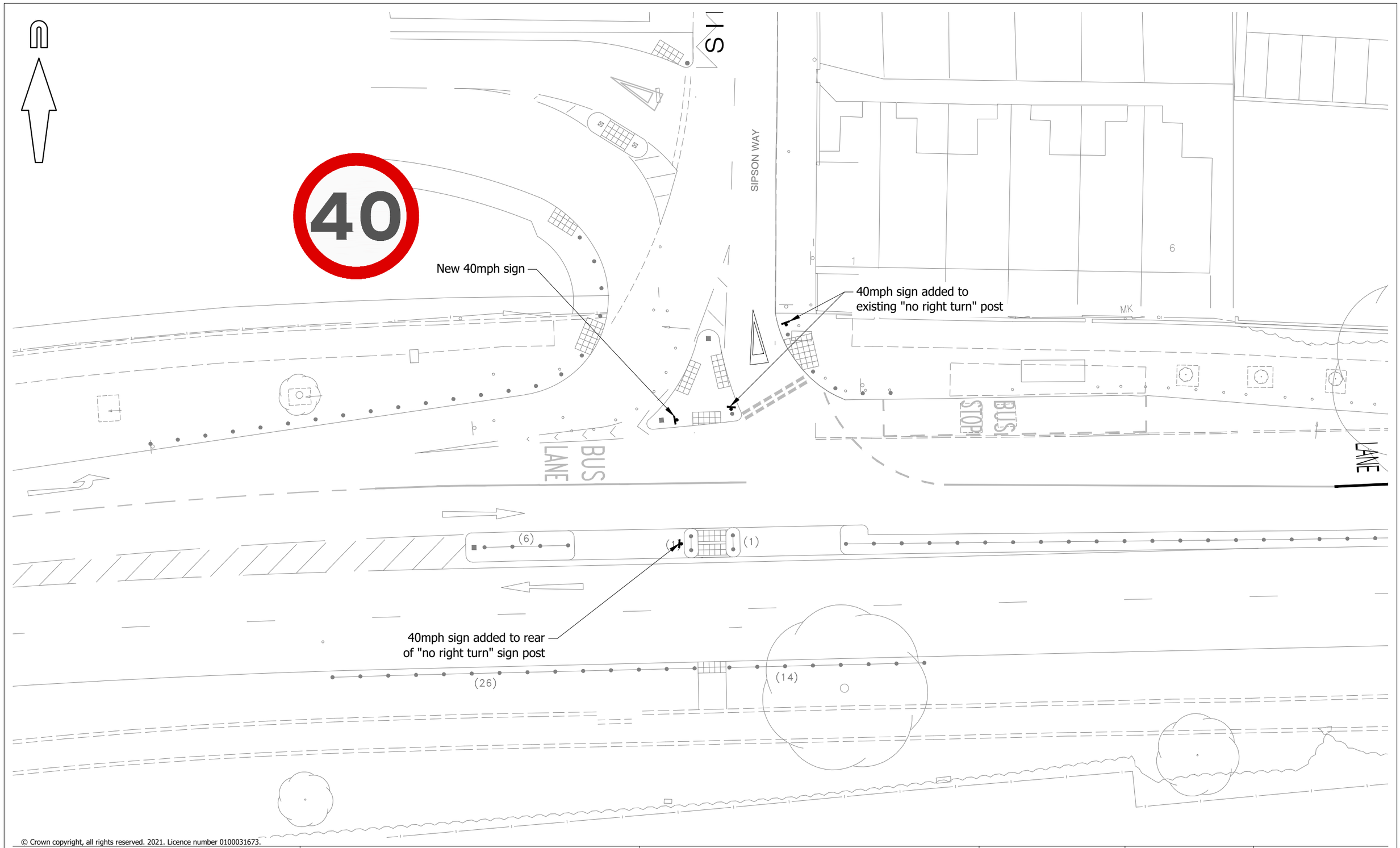
project
NCP CAR PARK, A4 BATH ROAD, HEATHROW

title
SWEPT PATH ANALYSIS
16.5M ARTIC ENTERING/EXITING SITE

scale	drawn by	checked by	
1:250 @ A3	JME	AP	
date	**cad file**	**suitability**	**rev.**
MAY 2021	MBSK210222		P3

drawing number
MBSK210222-06

APPENDIX D: 40mph Speed Limit Extension



© Crown copyright, all rights reserved. 2021. Licence number 0100031673.

mayer brown

Mayer Brown Limited
Lion House Oriental Road Woking Surrey GU22 8AR
Telephone 01483 750 508 Fax 01483 750 437
wokingoffice@mayerbrown.co.uk www.mayerbrown.co.uk

client
HEATHROW NCP PROPERTY LTD

project
NCP CAR PARK, A4 BATH ROAD, HEATHROW

title
POSSIBLE EXTENDED 40 MPH ZONE

scale	drawn by	checked by	
1:250 @ A3	JME	AP	
date	cad file	suitability	rev.
MAY 2021	MBSK210222		P2

drawing number
MBSK210222-02

APPENDIX E: Traffic Survey Results

Heathrow ATC, Bath Road

Channel 1 - Eastbound **85th Percentile**

Hr Ending	02/07/2019 Tuesday	03/07/2019 Wednesday	04/07/2019 Thursday	05/07/2019 Friday	06/07/2019 Saturday	07/07/2019 Sunday	08/07/2019 Monday
1	43.7	38.6	44.0	43.7	43.9	43.7	43.2
2	38.5	43.3	43.4	43.9	43.7	38.9	43.5
3	43.6	43.3	43.3	43.8	43.5	43.5	43.3
4	43.3	43.8	43.2	43.0	43.4	43.1	43.3
5	43.3	43.8	43.2	43.5	43.1	43.8	43.0
6	43.8	38.6	43.6	43.9	38.8	43.4	43.5
7	43.0	39.0	43.4	38.4	43.5	43.5	43.2
8	38.8	43.9	38.4	38.7	38.8	43.5	38.9
9	38.8	38.2	38.7	38.5	38.6	38.2	38.6
10	38.7	38.7	38.3	38.5	38.8	38.3	38.8
11	38.0	39.0	38.6	38.5	38.0	38.1	38.9
12	38.4	38.2	38.2	38.4	38.2	38.6	38.3
13	38.9	38.5	38.2	38.4	38.1	38.2	38.5
14	38.8	38.1	38.6	38.3	38.1	43.9	38.1
15	38.4	39.0	15.6	38.1	38.3	38.1	38.6
16	39.0	43.7	33.5	38.2	38.1	38.4	38.4
17	38.9	38.0	26.4	44.0	38.0	38.3	39.0
18	38.1	43.6	33.3	38.1	38.5	38.9	38.1
19	38.9	38.1	16.3	38.4	38.7	43.8	38.9
20	43.4	43.1	25.9	43.4	38.5	43.3	38.6
21	43.5	38.8	38.3	43.5	38.8	38.7	43.3
22	38.8	38.3	43.9	38.2	38.1	38.3	38.1
23	38.1	43.0	38.6	43.5	43.2	38.1	38.5
24	38.6	43.3	43.6	38.3	38.7	38.0	43.2

10-12	38.5	38.4	38.4	38.6	38.5	38.3	39.0
14-16	38.3	43.3	25.6	38.5	38.4	38.8	38.1
0-24	38.6	38.9	38.6	38.2	38.1	38.3	38.0

85th %ile	38.4

A4 Bath Road, July 2000 ATC Survey

Eastbound	Thurs 6th July	Friday 7th July	Saturday 8th	Sunday 9th	Monday 10th	Tuesday 11th	Wednesay 12th	Average (all days)	Average (weekdays)
00:00	66	58	97	129	83	46	60	77	63
01:00	54	36	47	93	40	29	41	49	40
02:00	44	27	48	48	25	24	24	34	29
03:00	73	40	38	31	26	35	37	40	42
04:00	243	100	67	44	114	75	83	104	123
05:00	617	305	137	76	396	295	300	304	383
06:00	854	1096	394	213	1340	1261	1230	913	1156
07:00	1494	1336	550	356	1477	1425	1414	1150	1429
08:00	1446	1178	834	467	1220	1141	1263	1078	1250
09:00	852	984	960	693	1052	1006	1034	940	986
10:00	645	949	1001	947	849	863	838	870	829
11:00	679	896	991	915	905	726	792	843	800
12:00	659	909	817	923	729	684	794	788	755
13:00	858	940	803	784	810	693	764	807	813
14:00	699	822	752	966	759	709	804	787	759
15:00	669	896	655	1087	753	741	827	804	777
16:00	672	946	717	1219	797	811	934	871	832
17:00	822	949	911	1294	732	906	864	925	855
18:00	812	768	797	1216	662	750	773	825	753
19:00	550	678	652	1219	535	553	541	675	571
20:00	409	502	433	840	310	299	294	441	363
21:00	287	309	288	604	267	224	249	318	267
22:00	254	226	245	352	188	351	194	259	243
23:00	162	144	230	158	93	182	118	155	140
Totals	13,920	15,094	12,464	14,674	14,162	13,829	14,272	**14,059**	**14,255**

A4 Bath Road, October 2010 ATC Survey

Eastbound	Thurday 14th	Friday 15th	Saturday 16th	Sunday 17th	Monday 18th	Tuesday 19th	Wednesday 20th	Average (all days)	Average (weekdays)
0		82	122	152	71	73	108	101	84
100		45	40	95	33	32	50	49	38
200		38	63	62	36	43	40	47	40
300		36	59	47	32	51	52	46	45
400		99	95	87	89	97	85	92	90
500		203	178	167	229	218	214	202	220
600		388	297	243	445	421	432	371	433
700		519	278	240	593	578	567	463	579
800		531	298	257	660	629	598	496	629
900		477	325	230	566	479	455	422	500
1000	208	390	272	263	470	398	390	342	371
1100	417	397	306	303	385	418	379	372	399
1200	491	478	423	394	470	440	456	450	467
1300	534	544	513	445	535	515	520	515	530
1400	561	594	554	473	524	563	532	543	555
1500	463	533	382	406	451	464	440	448	470
1600	581	561	322	390	476	577	549	494	549
1700	619	618	348	418	580	653	596	547	613
1800	490	500	363	533	495	554	567	500	521
1900	419	453	368	408	381	432	482	420	433
2000	358	439	303	362	370	357	361	364	377
2100	378	381	325	346	350	359	336	354	361
2200	383	394	316	326	318	358	345	349	360
2300	201	161	197	162	137	171	152	169	164
Totals	6,103	8,861	6,747	6,809	8,696	8,880	8,706	**8,156**	**8,829**

A4 Bath Road, July 2019 ATC Survey

Eastbound	Tues 2nd July	Weds 3rd July	Thurs 4th July	Friday 5th July	Sat 6th July	Sun 7th July	Mon 8th July	Average (all days)	Average (weekdays)
1	141	149	133	171	147	170	145	151	148
2	53	64	60	83	67	108	58	70	64
3	53	68	51	66	78	69	44	61	56
4	77	72	63	70	66	53	61	66	69
5	141	144	130	147	157	140	123	140	137
6	344	349	328	314	257	230	317	306	330
7	567	534	503	502	386	279	574	478	536
8	658	551	608	524	367	292	634	519	595
9	571	587	574	533	519	348	639	539	581
10	620	658	529	456	374	366	541	506	561
11	433	492	445	417	314	473	372	421	432
12	444	416	392	443	378	438	405	417	420
13	531	483	515	481	456	529	505	500	503
14	558	548	569	584	566	527	571	560	566
15	513	545	542	617	559	602	555	562	554
16	471	520	647	540	409	436	489	502	533
17	597	561	631	553	420	452	561	539	581
18	604	629	654	611	487	639	567	599	613
19	565	583	577	542	437	491	557	536	565
20	468	517	594	445	433	428	439	475	493
21	417	468	425	419	348	432	372	412	420
22	385	394	448	402	337	353	332	379	392
23	348	369	372	371	293	307	347	344	361
24	260	271	281	219	266	216	251	252	256
Totals	9,819	9,972	10,071	9,510	8,121	8,378	9,459	**9,333**	**9,766**

Service Road, July 2019 ATC Survey

Eastbound	Tues 2nd July	Weds 3rd July	Thurs 4th July	Friday 5th July	Sat 6th July	Sun 7th July	Mon 8th July	Average (all days)	Average (weekdays)
1	0	0	1	0	0	0	0	0	0
2	0	0	0	0	0	2	0	0	0
3	0	0	1	0	0	0	0	0	0
4	2	1	1	1	1	1	1	1	1
5	3	3	3	3	3	3	3	3	3
6	3	3	4	3	3	4	3	3	3
7	4	3	4	5	3	6	3	4	4
8	8	2	5	5	7	6	8	6	6
9	15	7	6	6	16	21	10	12	9
10	6	4	8	6	15	4	11	8	7
11	5	8	6	7	7	13	16	9	8
12	8	8	6	5	9	12	7	8	7
13	6	5	4	6	13	10	6	7	5
14	7	5	2	3	20	14	10	9	5
15	7	6	6	7	11	10	6	8	6
16	8	7	8	8	9	7	4	7	7
17	4	5	8	8	10	13	6	8	6
18	5	7	3	6	6	14	9	7	6
19	6	7	8	4	9	10	8	7	7
20	8	9	10	9	8	6	6	8	8
21	8	8	8	9	15	12	9	10	8
22	7	3	7	8	15	11	8	8	7
23	10	12	12	11	10	8	8	10	11
24	9	6	7	9	3	4	5	6	7
Totals	139	119	128	129	193	191	147	**149**	**132**

Bath Road - Eastbound

	Jul-00		Oct-10		Jul-19	
	Average (all days)	Average (weekdays)	Average (all days)	Average (weekdays)	Average (all days)	Average (weekdays)
00:00	77	63	101	84	151	148
01:00	49	40	49	38	70	64
02:00	34	29	47	40	61	56
03:00	40	42	46	45	66	69
04:00	104	123	92	90	140	137
05:00	304	383	202	220	306	330
06:00	913	1,156	371	433	478	536
07:00	1,150	1,429	463	579	519	595
08:00	1,078	1,250	496	629	539	581
09:00	940	986	422	500	506	561
10:00	870	829	342	371	421	432
11:00	843	800	372	399	417	420
12:00	788	755	450	467	500	503
13:00	807	813	515	530	560	566
14:00	787	759	543	555	562	554
15:00	804	777	448	470	502	533
16:00	871	832	494	549	539	581
17:00	925	855	547	613	599	613
18:00	825	753	500	521	536	565
19:00	675	571	420	433	475	493
20:00	441	363	364	377	412	420
21:00	318	267	354	361	379	392
22:00	259	243	349	360	344	361
23:00	155	140	169	164	252	256
Totals	**14,059**	**14,255**	**8,156**	**8,829**	**9,333**	**9,766**

APPENDIX F: Junction Capacity Modelling

Junctions 9

PICADY 9 - Priority Intersection Module

Version: 9.5.1.7462
© Copyright TRL Limited, 2019

For sales and distribution information, program advice and maintenance, contact TRL:
+44 (0)1344 379777 software@trl.co.uk www.trlsoftware.co.uk

The users of this computer program for the solution of an engineering problem are in no way relieved of their responsibility for the correctness of the solution

Filename: A4-Site Access_Modelled as per TRL Instruction.j9
Path: H:_Planning 7\Current jobs\NCPHeathrow5.1\Modelling and TRICS
Report generation date: 16/03/2021 14:17:38

»2021 Network Peak, AM
»2021 Network Peak, PM

Summary of junction performance

	AM						PM					
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Network Residual Capacity	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Network Residual Capacity
	2021 Network Peak											
Stream B-AC	D1	0.0	6.78	0.02	A	245 %	D2	0.0	6.89	0.01	A	254 %
Stream C-AB		0.0	0.00	0.00	A	[Stream B-AC]		0.0	0.00	0.00	A	[Stream B-AC]

Values shown are the highest values encountered over all time segments. Delay is the maximum value of average delay per arriving vehicle. Network Residual Capacity indicates the amount by which network flow could be increased before a user-definable threshold (see Analysis Options) is met.

File summary

File Description

Title	
Location	
Site number	
Date	16/03/2021
Version	
Status	(new file)
Identifier	
Client	
Jobnumber	
Enumerator	MAYERBROWN2K\rkingston
Description	

Units

Distance units	Speed units	Traffic units input	Traffic units results	Flow units	Average delay units	Total delay units	Rate of delay units
m	kph	Veh	PCU	perHour	s	-Min	perMin

Analysis Options

Calculate Queue Percentiles	Calculate residual capacity	Residual capacity criteria type	RFC Threshold	Average Delay threshold (s)	Queue threshold (PCU)
	✓	Delay	0.85	36.00	20.00

Demand Set Summary

ID	Scenario name	Time Period name	Description	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D1	2021 Network Peak	AM	A4 Eastbound and Car Park flows, bus lane excluded.	ONE HOUR	07:45	09:15	15
D2	2021 Network Peak	PM	A4 Eastbound and Car Park flows, bus lane excluded.	ONE HOUR	16:45	18:15	15

Analysis Set Details

ID	Network flow scaling factor (%)
A1	100.000

2021 Network Peak, AM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction type	Major road direction	Use circulating lanes	Junction Delay (s)	Junction LOS
1	NCP Heathrow Access	T-Junction	One-way from A to C		0.09	A

Junction Network Options

Driving side	Lighting	Network residual capacity (%)	First arm reaching threshold
Left	Normal/unknown	245	Stream B-AC

Arms

Arms

Arm	Name	Description	Arm type
A	A4 Bath Road Eastbound		Major
B	Site Access		Minor
C	A4 Bath Road Westbound		Major

Major Arm Geometry

Arm	Width of carriageway (m)	Has kerbed central reserve	Width of kerbed central reserve (m)	Has right turn bay	Visibility for right turn (m)	Blocks?	Blocking queue (PCU)
C	6.35	✓	0.00			✓	

Geometries for Arm C are measured opposite Arm B. Geometries for Arm A (if relevant) are measured opposite Arm D.

Minor Arm Geometry

Arm	Minor arm type	Lane width (m)	Visibility to left (m)	Visibility to right (m)
B	One lane	4.89	250	75

Slope / Intercept / Capacity

Priority Intersection Slopes and Intercepts

Stream	Intercept (PCU/hr)	Slope for A-B	Slope for A-C	Slope for C-A	Slope for C-B
B-A	712	0.092	0.232	0.146	0.332
B-C	798	0.087	0.219	-	-
C-B	574	0.158	0.158	-	-

The slopes and intercepts shown above do NOT include any corrections or adjustments.

Streams may be combined, in which case capacity will be adjusted.

Values are shown for the first time segment only; they may differ for subsequent time segments.

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Description	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D1	2021 Network Peak	AM	A4 Eastbound and Car Park flows, bus lane excluded.	ONE HOUR	07:45	09:15	15

Vehicle mix source	PCU Factor for a HV (PCU)
HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Use O-D data	Average Demand (Veh/hr)	Scaling Factor (%)
A		✓	604	100.000
B		✓	9	100.000
C		✓	0	100.000

Origin-Destination Data

Demand (Veh/hr)

		To		
		A	B	C
From	A	0	10	594
	B	0	0	9
	C	0	0	0

Vehicle Mix

Heavy Vehicle Percentages

		To		
		A	B	C
From	A	0	1	30
	B	0	0	13
	C	0	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
B-AC	0.02	6.78	0.0	A
C-AB	0.00	0.00	0.0	A
C-A				
A-B				
A-C				

Main Results for each time segment

07:45 - 08:00

Stream	Total Demand (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	8	670	0.011	8	0.0	6.140	A
C-AB	0	481	0.000	0	0.0	0.000	A
C-A	0			0			
A-B	8			8			
A-C	581			581			

08:00 - 08:15

Stream	Total Demand (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	9	645	0.014	9	0.0	6.394	A
C-AB	0	463	0.000	0	0.0	0.000	A
C-A	0			0			
A-B	9			9			
A-C	694			694			

08:15 - 08:30

Stream	Total Demand (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	11	611	0.018	11	0.0	6.782	A
C-AB	0	438	0.000	0	0.0	0.000	A
C-A	0			0			
A-B	11			11			
A-C	850			850			

08:30 - 08:45

Stream	Total Demand (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	11	611	0.018	11	0.0	6.782	A
C-AB	0	438	0.000	0	0.0	0.000	A
C-A	0			0			
A-B	11			11			
A-C	850			850			

08:45 - 09:00

Stream	Total Demand (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	9	645	0.014	9	0.0	6.394	A
C-AB	0	463	0.000	0	0.0	0.000	A
C-A	0			0			
A-B	9			9			
A-C	694			694			

09:00 - 09:15

Stream	Total Demand (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	8	670	0.011	8	0.0	6.140	A
C-AB	0	481	0.000	0	0.0	0.000	A
C-A	0			0			
A-B	8			8			
A-C	581			581			

2021 Network Peak, PM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction type	Major road direction	Use circulating lanes	Junction Delay (s)	Junction LOS
1	NCP Heathrow Access	T-Junction	One-way from A to C		0.06	A

Junction Network Options

Driving side	Lighting	Network residual capacity (%)	First arm reaching threshold
Left	Normal/unknown	254	Stream B-AC

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Description	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)
D2	2021 Network Peak	PM	A4 Eastbound and Car Park flows, bus lane excluded.	ONE HOUR	16:45	18:15	15

Vehicle mix source	PCU Factor for a HV (PCU)
HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Use O-D data	Average Demand (Veh/hr)	Scaling Factor (%)
A		✓	631	100.000
B		✓	6	100.000
C		✓	0	100.000

Origin-Destination Data

Demand (Veh/hr)

		To		
		A	B	C
From	A	0	4	627
	B	0	0	6
	C	0	0	0

Vehicle Mix

Heavy Vehicle Percentages

		To		
		A	B	C
From	A	0	0	22
	B	0	0	16
	C	0	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS
B-AC	0.01	6.89	0.0	A
C-AB	0.00	0.00	0.0	A
C-A				
A-B				
A-C				

Main Results for each time segment

16:45 - 17:00

Stream	Total Demand (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	5	672	0.008	5	0.0	6.264	A
C-AB	0	483	0.000	0	0.0	0.000	A
C-A	0			0			
A-B	3			3			
A-C	576			576			

17:00 - 17:15

Stream	Total Demand (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	6	647	0.010	6	0.0	6.514	A
C-AB	0	465	0.000	0	0.0	0.000	A
C-A	0			0			
A-B	4			4			
A-C	687			687			

17:15 - 17:30

Stream	Total Demand (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	8	613	0.013	8	0.0	6.894	A
C-AB	0	441	0.000	0	0.0	0.000	A
C-A	0			0			
A-B	4			4			
A-C	842			842			

17:30 - 17:45

Stream	Total Demand (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	8	613	0.013	8	0.0	6.894	A
C-AB	0	441	0.000	0	0.0	0.000	A
C-A	0			0			
A-B	4			4			
A-C	842			842			

17:45 - 18:00

Stream	Total Demand (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	6	647	0.010	6	0.0	6.514	A
C-AB	0	465	0.000	0	0.0	0.000	A
C-A	0			0			
A-B	4			4			
A-C	687			687			

18:00 - 18:15

Stream	Total Demand (PCU/hr)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	5	672	0.008	5	0.0	6.265	A
C-AB	0	483	0.000	0	0.0	0.000	A
C-A	0			0			
A-B	3			3			
A-C	576			576			

APPENDIX G: 2018 Pre-application TfL Response Letter

Transport for London

Our ref: 18/3262

Transport for London
City Planning

5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

Phone 020 7222 5600
www.tfl.gov.uk

Marie Hodgson
Pick Everard
Halford House
Charles Street
Leicester LE1 1HA

By email only

24th September 2018

Dear Marie

Bath Road/Sipson Lane NCP Car Park, LB Hillingdon

Please note that the following comments represent the views of Transport for London officers and are made on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority.

I write in relation to your recent pre-application request for written advice on construction of an additional, left-in, left-out vehicular access onto Bath Road serving the existing long-term car park for Heathrow passengers. There are 630 spaces and 4 accessible-design spaces. Users are served by shuttle bus to/from Heathrow T2 and T3 which run every 20 minutes.

There are no changes proposed to the parking itself. Were there to be in the future or any other use of the site to be considered in the future, TfL's views would need to be sought and a further RSA appropriate to the level of traffic produced.

Thank you for supplying a 2010 Transport Assessment, a September 2018 TA Addendum; baseline information in a draft scope and two sets of new junction plans/swept paths.

Location & Access

The car park is site is located west of Sipson Way, a largely residential road leading to a disused police accommodation block to its north; to the east is a cutting dropping down to the M4 spur and to the south at grade is the A4 Bath Road, which has a central reservation and is elevated at this point to cross the A4. Currently access to the NCP Heathrow car park requires crossing land of the Park Inn Hotel at the other side of the cutting and using a narrow road bridge over the M4 spur to enter the car park. There was a secondary access from Sipson Way but the submission says it is now permanently closed; the reasons for this are not given.

There is a footway and segregated cycle way crossing the site frontage to Bath Road of about 4.5m wide and the adjacent nearside lane is open to buses, cyclists and taxis only (the bus lane). Around 30m to the west of the initial (2011) location you supplied for the access, and some 25m west from the alternative location for which you later supplied details in the TA Addendum, there is a bus stop in a lay-by, clear of the bus lane. Seven bus routes and a coach serve this eastbound stop. However there is no nearby pedestrian crossing of Bath Road to enable easy access to the westbound stop serving these routes. The nearest tube station, Heathrow T2&3, is served by Piccadilly Line and lies 1100m south – not within walking distance. The Public Transport Access Level (PTAL) of the site is 3.

TfL is the Highway Authority for A4 Bath Road and its structures and which forms part of the Transport for London Road Network (TLRN). The speed limit is 50mph and there is no stopping. TfL has additional responsibilities for road safety, keeping traffic moving, maintaining street trees and as a public transport provider. Comments on this planning proposal do not represent guidance under the Traffic Management Act 2004 for which separate approvals are required.

Highways England is responsible for the M4 spur. The narrow bridge over the M4 which currently is the access to the car park is assumed to be Hillingdon Council's asset or else privately owned. I confirm it is not the responsibility of TfL.

Strategic policy documents relevant to this application are the London Plan 2015 and the Draft London Plan (DLP) dated December 2017 which has recently passed the Minor Suggested Changes stage and carries material weight in the consideration of planning proposals; TfL seeks to reflect the thrust of its new standards, policies and visions (for example, Healthy Streets and "Vision Zero" (cycling collisions). Any formal planning submission will therefore need to take account of emerging policy as well as the Mayor's Transport Strategy (MTS) published in March this year.

Case History

A relocation of the entrance to the car park onto Bath Road was applied for in 2002 and refused due to concerns raised by TfL and the Council on its effect on the free flow of traffic; highway safety grounds, landscaping (loss of highway trees). This was overturned on appeal in 2004. At this time the Inspector seems to have had little detailed highway technical or design material let alone a Road Safety Audit in front of him. He did note the car park had no planning permission but that the Council considered that as more than 10 years had elapsed since the use had commenced that it was immune from enforcement action.

Permission was subsequently renewed for the Bath Road access in 2010, requiring a Road Safety Audit (RSA) and a s278 agreement under the Highways Act. The permission was not implemented, though a 2011 RSA was produced by TfL which highlighted three safety problems:

1. Inadequate entry / exit provision may increase potential for conflict
2. Inadequate side road provision for pedestrians
3. Access may increase collision severity if vehicles leave the carriageway leading to "potential difficulties with the provision of the access at the location proposed"

The report made (non-binding) recommendations as to how these problems could be addressed.

In addition the auditors identified potential (non safety) difficulties with the provision of the access at the location proposed as follows:

"It would appear that to facilitate the access, removal of two mature trees and relocation of a range of services will be required. There is a high possibility that the relocation of fibre-optic telecommunications will be required, due to the very close proximity of the site to telecoms and trafficmaster equipment. It is understood that relocation of these services may prove difficult and with significant expense should they be required".

Whether the RSA's advice deterred the owner from building the access is not known but in any case the permission has long since lapsed. The A4 at this location retains the same features/design, but the planning policy, transport and travel context has moved on and the appeal decision is now considered to have little weight by virtue of its age (14 years) and the renewed permission is now some 8 years old.

This letter consequently reviews the current context against your initial (re-submitted) access proposal (as per the 2004 and 2010 planning permissions). We refer also to the 7th September 18 TA addendum intention to move the access slightly west, the reason given being to avoid disturbing a number of utility boxes in the way of the previously consented location for the access and

the close proximity of the motorway bridge abutments. Significantly, this new proposal also involves removing the bus lane prior to the car park access, and re-introducing it as a taper after it. In the time allowed since receipt of your addendum proposals a full technical response to the latter could not be provided, however a summary of advice is given later and further more detailed advice can be provided subsequently.

In our correspondence you made brief mention that the applicant considers the narrow bridge over the motorway spur is deteriorating. No further evidence was supplied on the latter and TfL has no comment on this aspect although it may be prudent to raise with the owner and if an adopted road the relevant highway authority.

Planning Policy, supporting documents
The strategic policy context and transport standards for London are set out in the London Plan 2015 and the new draft London Plan of December 2017 (NDLP) which sets more challenging goals for active travel & public transport mode share increases (80% collectively by 2041), healthy streets and lower car parking levels/higher cycle parking levels**.** The site lies within an Air Quality Management area (Hillingdon).

Policy T2 Healthy Streets part D in the NDLP states development proposals should 1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with TfL Guidance. The development does not appear to deliver any and instead may adversely impact on these indicators.

Policy T3 of the NDLP part E states "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…" The development does not deliver such improvements and the removal of the bus lane would lead to less efficient operation of buses services.

Policy T4 Assessing and mitigating transport impacts part F states
"Development proposals should not increase road danger". Further information is required to enable assessment of compliance with this policy. The RSA was undertaken in 2011 and as is stated in the report has a maximum of 2 years shelf life (i.e. in this case to 2013). It also assessed only the original proposal and not the addendum scheme. An updated RSA for the option for the new access for which permission is to be sought is in my view essential to help to identify issues and how to mitigate them.

Policy G7 Trees & Woodlands part C states "Development proposals should ensure that, wherever possible, existing trees of quality are retained. If it is imperative that trees have to be removed, there should be adequate replacement based on the existing value of the benefits of the trees removed".

There is no evidence that this access scheme is essential such that the existing street trees (and indeed on site planting) should be removed as there is already a functioning access to the land use.

The London Plan 2015 similarly aims to maintain road safety, traffic flows, bus travel efficiency and assessment/identification of development impacts. Currently the submission relies on information supplied in a 2010 TA with an addendum to cover the alternative location of the proposed Bath Road access. Evidence supporting compliance with current Mayoral policy must form part of a re-submission, including inter alia assessment against the policies outlined above.

We advocate the use of data no more than 5 years old, new traffic surveys and a current baseline. As noted above the RSA has a shelf life of no longer than 2 years and must be undertaken again to support of any new application. One of many independent RSA practitioners approved by TfL should be used to produce it, alternatively TfL's road safety section itself can produce the RSA (current estimated cost is £800+VAT).

Current Highway conditions
Your proposal for a new access will be assessed in the context of more challenging, peak-time congested conditions than in 2010 let alone 2004 and the steady rise (save one year's plateau) of the daily average traffic count since 2012.

Meanwhile it is safe to assume that cycle flows on the A4's carriageway and its segregated path have increased at least as much as background levels in Greater London, which during the period from 2000 to 2012 experienced a doubling in the number of daily journeys made by bicycle to 580,000 and this remains the fastest-increasing mode of transport.

Highway Safety
In 2010 TfL objected to the proposal on the grounds of **unacceptable highway, safety and environmental impact to the TLRN.** This was because of its unsuitable location just 15m east of a bus layby and likely dangerous/disruptive movements that vehicles turning into the car park across the bus lane would generate and the loss of trees on the footway. I have consulted TfL Highway Design afresh on your two options (with and without bus lane discontinuity and looking at the swept paths for a vehicle no longer than the van design - presumed to equate to the shuttle bus). They conclude that this is not a good location for an access and raise the following considerable concerns which any submission is expected to address to TfL's satisfaction:

- *Proximity to the bus stop – this will affect visibility of those exiting, and there is a risk buses will pull away at the same time drivers move across to enter car park, causing a safety concern.*

- *This is of greater concern with the latter (addendum) design where the entrance/exit is further west and closer to the bus stop.*

- *Lack of acceleration and deceleration lanes in both design options– are drivers expected to enter the bus lane to decelerate and risk being fined for entering a bus lane to enter the car park? Then when exiting are drivers expected to take the risk and pull out into the offside lane and risk collisions/causing congestion or use bus lane to accelerate and risk being fined?*

    - *The DMRB states acceleration/deceleration lanes should be provided for roads where the design speed for the A road is 85kph (53mph) or above. Therefore whilst Bath Road is just under that speed I think in this scenario with the bus lane it could benefit from it.*

    - *Bath Lane is a 50mph which emphasises the need for an acceleration/deceleration lane.*

    - *The lack of these acceleration/deceleration lane may impede the vehicles that are following, could lead to congestion at busy times*

- *The original design (entrance/exit to the east) cuts through the vehicle restraint barrier (crash barrier) and so part of the barrier would need removing, but it is queried whether this would open up a safety concern that the barrier had previously solved (i.e. vehicles crashing onto the M4 Spur Road, damaging the bridge structure and/or colliding with pedestrians and cyclists). The recent design option is a small improvement in that it places the access further west and away from the start of the vehicle restraint system.*

- *The initial design option supplied doesn't detail any sort of break in the bus lane which would be necessary for vehicles to cross over it (legally). The subsequent design does break the line i.e. discontinue the bus lane but that does not remove the intervisibility/deceleration problems. It may also encourage traffic additional to the Flightpath customers/buses to use the lane and then not exit it when the bus lane tapers back in.*

- *Given the high frequency of buses – and coaches serving the airport- drivers may have a problem accessing the entrance without causing collisions, with either design option.*

    - *Motorbikes and cyclists are allowed in the bus lane too, is there an increased risk of collisions caused by drivers not seeing or judging the oncoming traffic speed well.*

- *If a bus is in the bus stop it may obscure drivers' (on Bath Road) visibility of vehicles trying to exit the car park, this will cause increase in collision risk.*

Bus Operations
TfL Buses consider it is likely that vehicle entering into the car park would be go into the path of buses which are pulling out from the bus stop; this would be conflict of movements and could be dangerous and at the least would slow buses down. Added to this, with the initial option, vehicles exiting the proposed vehicular crossover would attempt to either to pull out to the off-side lane to avoid being fined for being in the bus lane; or to stay in the bus lane illegally - both of these movements would be disruptive/ dangerous to other road users (including buses), and is therefore not acceptable.

The option proposed to discontinue the bus lane is also not supported: whilst this was suggested in the 2011 RSA this is less favoured now due to the likelihood of bus delays arising and the increased levels of traffic including cycling making it potentially more dangerous for lane crossing in a short length of derestricted lane. Furthermore the proposed removal of the bus lane put forward in the TA addendum for the alternative scheme would make it more difficult and dangerous for buses to get out of the bus stop. There mau be a misunderstanding of the RSA recommendation which is likely to have meant a break in the lane for the length of the deceleration facility, not the removal of the bus lane.

TfL will not allow the relocation of the bus stop for technical, practical and operational reasons and this seems to have been accepted from the start as there is no history of such a proposal.

Walking and Cycling
As noted above there is currently a vehicle restraint barrier between the bus lane and the cycleway/footway, to protect users from straying cars and also to stop cars from crashing over the bridge parapet onto the roads below or at the least a collision compromising the bridge structure. The original proposal for the new access requires the removal of this feature which also protects the safety of vulnerable road users alongside a 50mph road. This is not acceptable.

Added to this in both options cyclists and pedestrians would need to cross a wide bell-mouth formed by the new access and the associated turning radii in and out of the site. The proposed central reservation ('island') is indicated in plans is a poor substitute to currently where pedestrians and cyclists on the shared way do not have to contend with any vehicles on this part of the A4. which would help address that. The 2011 RSA noted that no provision is made to indicate the presence of the access to pedestrians, increasing the potential for conflict with vehicles ingressing and egressing. The recommendation then

included the addition of a ramped access and tactile paving, but neither this nor any other mitigation is featured on the designs submitted and furthermore such provision would only reduce a safety risk it would not prevent accidents nor would it provide an equivalent to the current conditions for pedestrians where there is no access.

Furthermore those cyclists who wish to use the carriageway would have reduced safety and comfort consequent upon having to share a lane with general traffic and that turning in and out of the proposed access.

Landscaping and Arboriculture
TfL's resistance to losing street trees was a factor in the objection in 2010. This position is now even stronger and the loss of two-three trees (new total not specified in the latest documents) is not accepted – even with the re-provision elsewhere. It should be noted that as owner of the trees a separate approval would be required before they could be removed or cut back.

The policy background is that in the time since 2010, the present Mayor has published targets to increase street trees across London, the latest is to increase tree cover in London by 10 per cent by 2050. In the Mayors Transport Strategy March 2018 an objective is that the Mayor, through TfL and the boroughs, will retain existing trees and plant new ones on the Transport for London Road Network (TLRN) and borough roads to protect tree canopy cover. Street tree numbers on the TLRN will be increased by 1 per cent every year between 2016 and 2025 https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf.

If the tree is healthy and poses no significant risk to the safe use of the highway then we contest its removal. If there is an arboricultural justification for the removal of a tree (i.e. the tree is in poor health and requires to be removed within the near future) and mitigation through replacement planting is an options within the design it may be considered. You have not provided nor are we aware of any such evidence in this case in respect of the street trees on Bath Road.

If despite this the local planning authority is minded to approve the proposal with tree loss, TFL will agree on the mitigation required with the developer. This will likely include the CAVAT value of any trees removed, costs associated to remove the tree(s) and replacement tree(s) costs. It would also include tree protection measures for remaining trees.

Construction
A Construction Management Plan would be requested to be applied as a condition should the Council be minded to approve an application. A framework

plan should be included in the TA. Careful consideration will need to be given to the stats and other particulars of the A4/M4 Spur Road bridge at the point of construction and an Asset Protection Agreement with TfL completed prior to implementation. An agreement may also be required with Highways England in respect of the M4 Spur Road.

Overview
As well as the technical objections, TfL also raises an in-principle objection to the proposal and its associated land-use because there is no real case for car parking here (remembering the use did not go through formal planning scrutiny) and furthermore there is an existing access with which the business is functioning and the and there seems no strong justification for adding another. Lastly, no design as proposed can fully mitigate the road safety risks the applicant would introduce with a new access onto the TLRN.

Summary
TfL would object to the grant of permission for either the original (2004/2010) access option or the new one put forward in the recent addendum to the TA involving alteration to the bus lane.

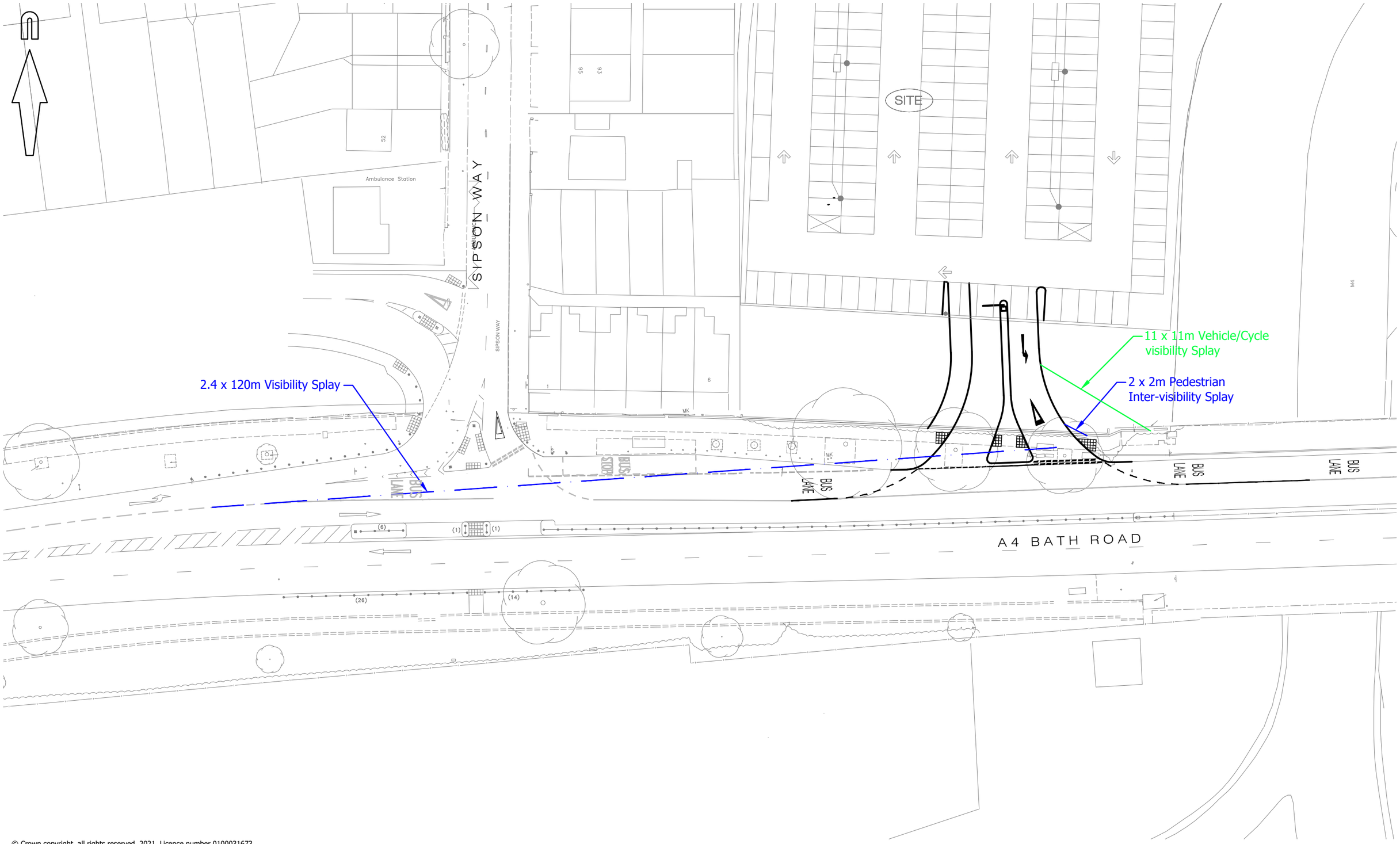
Should the applicant want to progress their proposals via a planning application they should carefully consider all the issues raised above, and include a new RSA amongst other supporting/explanatory evidence.

Please do not hesitate to contact Rachel Yorke on 020 3054 7030 or myself if you have any queries.

Yours sincerely

Lucinda Turner
Director of spatial Planning
Email: lucindaturner@tfl.gov.uk
Direct line: 020 3054 7133

Appendix H: Visibility Splays



© Crown copyright, all rights reserved. 2021. Licence number 0100031673.

mayer brown

Mayer Brown Limited
Lion House Oriental Road Woking Surrey GU22 8AR
Telephone 01483 750 508 Fax 01483 750 437
wokingoffice@mayerbrown.co.uk www.mayerbrown.co.uk

client
HEATHROW NCP PROPERTY LTD

project
NCP CAR PARK, A4 BATH ROAD, HEATHROW

title
VISIBILITY SPLAY FROM ACCESS

scale	drawn by	checked by
1:500 @ A3	JME	AP

date	cad file	suitability	rev.
MAY 2021	MBSK210222		P4

drawing number
MBSK210222-07