
**IMPERIAL HOUSE, VICTORIA ROAD,
SOUTH RUISLIP**

Proposed Lidl Foodstore

**Response to London Borough of Hillingdon
Highway Officer Comments
On behalf of Lidl UK GmbH**

April 2015



Project: Imperial House, Victoria Road, South Ruislip
Proposed Lidl Foodstore

Client: Lidl UK GmbH

Document: Response to London Borough of Hillingdon Highway Officer Comments

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1 INTRODUCTION

1.1 Gateway TSP is instructed by Lidl UK GmbH to prepare this Technical Note to address Highway Officer comments received on a planning application (reference 5039/APP/2014/3715) to construct a discount foodstore and refurbish a number of units at the Stonefield Retail Park, Victoria Road, South Ruislip.

1.2 The Technical Note is structured to reflect the comments made by the Highway Officer at the London Borough of Hillingdon and addresses all points made.

Clarification on Floorspace Allocations

1.3 Lidl UK GmbH has acquired the former car dealership known as Imperial House and proposes to demolish the unit and replace it with a new 1,286 sqm sales area Lidl foodstore.

1.4 In doing so, they would transfer a portion (1,286 sqm) of the 1,915 square metre Open A1 permitted use (as detailed in the Certificate of Lawfulness) already in place at the Stonefield Way Retail Park from the Comet/Bensons for Beds units to their new Lidl foodstore on the site of the former Imperial House.

1.5 The remaining 629 sqm of Open A1 use class (representing the sum of the 1,915 sqm existing permitted less the 1,286 sqm Lidl foodstore) would remain at the existing units and be split between the Comet (349 sqm) unit and Bensons for Beds (280 sqm) unit.

1.6 The remaining floorspace at the Comet and Bensons for Beds units represents the increase in retail floorspace at the site and is proposed to be the subject of a Condition to restrict the sale of goods to A1 Comparison goods. The remaining floorspace includes 422 sqm at the Bensons for Beds unit, 521 sqm at the Comet unit and a further 343 sqm back of house; a combined total of 1,286 square metres.

1.7 The floorspace allocations are summarised in Table 1.

Use Class	Baseline Permitted Uses (net sales)	Proposed Uses (net sales)	Net Change (net sales)
Open A1 (Convenience)	1,915 sqm	1,286 sqm Lidl and 349 sqm remaining part of former Comet 280 sqm Bensons for Beds Mezzanine	No Change
A1 (Comparison Only)	-	422 sqm Bensons for Beds, 521 sqm remainder of Comet unit and 343 sqm back of house	+1,286 sqm
Sui Generis	2,150 sqm	-	-2,150 sqm

Table 1: Baseline and Proposed Application Site Use Comparison

1.8 In the event that Lidl were unsuccessful in obtaining planning permission for a new foodstore at Imperial House, their 'fall back' position is to amalgamate the vacant Comet and Bensons for Beds units into one Lidl foodstore, which can be undertaken without the need for further planning permissions to be obtained.

1.9 The baseline position for the site is therefore, that 1,915 sqm of Open A1 consent is already in place and in theory any foodstore could operate from the Retail Park without the need for additional planning permission. The net increase in trips associated with the site is therefore 1,286 square metres of Open A1 Comparison goods floor space. This is the assessment that has been undertaken in the Transport Assessment submitted with the application.

1.10 No account has been made of the net reduction in movements associated with the removal of the 2,150 square metres of Sui Generis use.

2 SERVICING

Comment: "The proposed service yard for the new store would require large articulated delivery vehicles to undertake manoeuvres within areas allocated for customer parking. This is considered unacceptable for safety reason."

- 2.1** The swept path analysis provided at Appendix H of the Transport Assessment indicates that the site access from Victoria Road can accommodate a 16.5 metre articulated vehicle entering the site, manoeuvring within the site and leaving the site in a forward gear. The manoeuvre into the service bay does make use of the car park access road, but given this is likely to occur 1-2 times per day, predominantly outside of peak operational hours, this is not considered to be unsuitable.
- 2.2** Given the size constraint of the site, it is not possible to devise an alternative servicing arrangement and the majority of Lidl stores operate with servicing arrangements taking place within the car parking area.
- 2.3** Within the London Borough of Hillingdon, similar manoeuvres are undertaken presently at other Lidl stores. Examples of this include the Lidl store on Uxbridge Road, Hayes and at Cowley Road, Uxbridge.
- 2.4** In addition, such a manoeuvre through the car park was recently permitted by Officers at the London Borough of Hillingdon in respect of the planning application at the Former Hayes Pool site, Botwell Lane, Hayes (planning application reference: 1942/APP/2013/3565).

3 PARKING

Comment: "No consideration has been given to the impact of customers parking for a longer duration as a consequence of visiting multiple retail stores in the vicinity of the proposed store. It should also be noted that while the existing Comet and Benson for Beds stores shared the provision for 85 car park spaces, the proposals with a Lidl foodstore would provide an additional 19 car park spaces, this is considered to be inadequate based on the evidence from other Lidl stores."

3.1 The development proposes a total of 104 car parking spaces, inclusive of 9 Blue Badge holder spaces, which is within the maximum applicable car parking standards identified within The London Plan.

3.2 Many Lidl stores experience parking constraint, the surveyed Lidl stores have the following parking provision:

- Barking – 63 spaces;
- Brixton – 29 spaces (Brixton was excluded from the vehicular trip assessment due to the parking restraint);
- Clapham – 75 spaces; and
- Cricklewood – 62 spaces.

3.3 The surveyed Lidl foodstores are stand-alone stores and it can be seen that Lidl typically operates with a relatively low level of car parking provision compared to mainstream foodstores. This reflects the relatively short duration of stay of customers at the store, given there are no additional facilities on offer that would materially extend a shopping trip duration of stay (e.g. a café).

3.4 If a site is constrained in terms of the parking provision, then Lidl customers are likely to travel further to an alternative store and would therefore increase the mileage travelled within the Hillingdon area since Pinner, Hayes and Uxbridge represent the closest alternative store options.

3.5 The development site has an operational Bensons for Beds unit, which would remain onsite in the future development scenario. This type of A1 retail use is not a significant generator of vehicle movements, which is evidenced in the Saturday peak operational traffic survey undertaken on Saturday 9th November 2013 and summarised in Table 2.

Time Period	Bensons for Beds (2013 Survey)		Total Parking Accumulation
	Arrivals	Departures	
11:00 – 12:00	2	0	2
12:00 – 13:00	7	3	6
13:00 – 14:00	0	4	2
14:00 – 15:00	4	5	1

Table 2: Bensons for Beds Existing Site Saturday Vehicular Demand

3.6 Table 2 indicates that the Bensons for Beds vehicular demand is relatively low over the course of a typical Saturday peak operational period. This is beneficial in considering the potential for parking accumulation with the Lidl proposal, since the Lidl store is expected to peak on a Saturday between 14:00 – 15:00 hours.

3.7 Lidl implement car park management across the majority of their stores and the South Ruislip site would also be subject to management. An ANPR based system would be implemented to ensure that the duration of stay of customers in the car park is managed. A Car Park Management Plan would be prepared if required, which could be secured by way of a Planning Condition.

- 3.8** Lidl are willing to commit to the provision of electric vehicle charging spaces at the London Plan standard of 10% active and 10% passive. Therefore 10 dual use spaces would be provided from the outset, with a further 10 to account for future demand. It is anticipated that this would be secured by way of a Planning Condition.

4 TRANSPORT ASSESSMENT

Lidl Store Trip Rates

Comment: "The supporting transport assessment has been based on data from other Lidl stores rather than using generic data that would allow consideration of a range of occupiers that could potentially operate from the new store."

- 4.1** The Open A1 consent, is the baseline position at the site and therefore the worst case scenario of an alternative foodstore opening on the site could be an existing position. However, it is important to note that Lidl is identified as the end occupier for the development and the proposed site/store layout is designed to Lidl's specification.
- 4.2** It is widely accepted good practice to tailor a Transport Assessment if an end user is identified, since this is likely to provide a more detailed and representative assessment of the potential impacts of such a development, rather than a generic use class assessment.
- 4.3** On this basis, surveys of existing Lidl stores within the London area (undertaken in the last 4 years) located at Barking, Clapham and Cricklewood are used to determine the typical vehicular trip rate profile across both peak periods. These are considered to offer a representative assessment for the proposal at South Ruislip. This is a methodology and a set of surveys that were accepted for the permitted Lidl store at Botwell Lane, Hayes.
- 4.4** An assessment of A1 Food Superstore sites available on the TRICS database was provided in Section 6 of the Transport Assessment. It has been demonstrated that there are no comparable food superstores in terms of sales floor area, parking provision or location that would indicate that a mainstream operator would occupy a unit in the application site location.

- 4.5** The TRICS data clearly indicates that smaller retail floor areas are only prevalent in town centre locations with no associated parking. There were no comparable weekday surveys available on the TRICS database and the two sites with car parking surveyed at the weekend had 123 and 226 car parking spaces respectively at stand-alone stores, which are not considered comparable to the development proposal.

Comment: "Moreover, the assessment is based on average trip rates together with optimistic assumptions regarding linked and pass-by trips. The cumulative impact of this approach is to potentially significantly reduce the forecast traffic generation from the development."

- 4.6** The use of average trip rates from a selection of comparable operational Lidl stores is considered the most appropriate calculation of future trip generation at the application site. This is no different to a generic TRICS trip rate assessment.

- 4.7** It is not clear on what basis the trip types are considered to be optimistic, we request clarification on this aspect from the Highway Officer.

- 4.8** The trip type proportions were based on the 95/2 TRICS Research Report 'Pass-by and Diverted Traffic', which is a commonly used method of identifying trip type proportions based on a number of surveyed examples.

- 4.9** Victoria Road is a local distributor road for the area and as such offers an increased potential for pass-by trips to occur. In addition, the proximity to other retail units within the vicinity of the site, would suggest that the potential for linked trips is likely to be higher than the 30-40% assumed for the purposes of assessment. It could reasonably be assumed therefore the level of pass-by and linked trips at the application site could be higher than predicted and therefore the assessment is a robust assessment of the potential impact on the local highway network.

Comment: "While the data from other Lidl used for assessing the traffic generation were of similar size, they had very good accessibility by public transport (PTALS 5-6b) unlike the PTAL 2 for the proposed development site. Furthermore, the transport assessment did not provide information regarding the corresponding provision for car parking at these stores."

- 4.10** The PTAL of a Lidl foodstore should not be the sole factor in considering its accessibility, since only a small minority of customers are likely to travel by tube or train to access the store. This is shown in the multi-modal assessment data included within the Transport Assessment, which indicates that regardless of the PTAL level and proximity to rail and tube services, the major modes of travel to a Lidl foodstore are by car, on foot and by bus.
- 4.11** On this basis, the South Ruislip proposal is considered to have a good level of accessibility, with 2 frequent bus routes serving within 400 metres of the site. This coupled with local walking and cycling routes indicates that the South Ruislip proposal has a good level of accessibility to the surrounding area.

5 TRAFFIC IMPACTS

Comment: "No assessment of wider traffic impacts of the proposed development for network operations or the cumulative impacts of traffic growth and traffic generation from committed developments has been undertaken. This could affect the base traffic demand and consequently the design of the proposed new access onto Victoria Road."

- 5.1** As requested by Highway Officers at the London Borough of Hillingdon at a pre-application meeting on the 19th August 2014, committed development at the ARLA site has been included within the Transport Assessment process.
- 5.2** The traffic modelling contained within the application for the ARLA development suggests that the development would result in a reduction in traffic flows along Victoria Road. On this basis, there would be a minimal negative impact on the highway network as a result of the ARLA development, with a reduction in journey times along the majority of routes.
- 5.3** It was also suggested at the pre-application meeting for the proposed Aldi unit at the Victoria Road Retail Park to be considered as committed development (reference 64445/APP). Whilst the application has now received a resolution to grant at Planning Committee, a review of the Transport Statement prepared by Vectos in 2014 has indicated that the assessment concluded that the proposals would have no material impact on the local highway network.
- 5.4** The ARLA application included an assessment of the potential trip generation of the Victoria Road Retail Park being reoccupied and included these within the baseline highway capacity assessment modelling undertaken. The Vectos Transport Statement states that these assumption assumed higher vehicular trip generation for the site across both a Friday evening peak and a Saturday peak than the redevelopment proposals would attract based on a refined TRICS assessment.

- 5.5** Given that the overall conclusion of the ARLA Transport Assessment was that there would be overall a reduction in journey times across the network, it is reasonable to conclude that these committed development sites need no further consideration within the Transport Assessment for the Lidl proposal at Imperial House. The use of TEMPRO growth factors to account for generalised growth in the area should be considered a robust approach to assessing the implications of the development proposals.
- 5.6** Within the Transport Assessment, traffic growth rates for a future year of 2016 (opening year) have been obtained from the TEMPRO database. These provide a future year baseline upon which the proposed development can be assessed. Subsequently, the 2016 future year scenarios are included in the traffic modelling undertaken within the TA of the site access junctions.
- 5.7** On this basis, the information required to address this point is summarised above, and contained in further detail within the Transport Assessment.

6 SUMMARY AND CONCLUSIONS

6.1 Gateway TSP is instructed by Lidl UK GmbH to prepare this Technical Note to address comments received on a planning application (reference 5039/APP/2014/3715) to construct a discount foodstore and refurbish a number of units at the Stonefield Retail Park, Victoria Road, South Ruislip.

6.2 This Technical Note provides further assessment information as requested by the Highway Officer at the London Borough of Hillingdon and seeks to provide all necessary information upon which the application can be determined.