
Technical Note

Project No: ITL14154
Project Title: Nestles Avenue, Hayes
Title: Response to TfL Comments
Ref: ITL14154-008a TN
Date: 11 April 2019

SECTION 1 INTRODUCTION

1.1.1 This Technical Note has been produced to respond to comments made by Transport for London (TfL) with respect to a planning application at Nestles Avenue, Hayes (planning ref 51175/APP/2018/4260). The application was made for;

“Demolition of existing building and redevelopment to provide a building up to 10 storeys, with 868 sqm of Class B1 floorspace at ground and first floor level and 81 residential units to the upper floors, with associated landscaping, access, car parking and cycle parking”

1.1.2 Comments on the application were received from TfL (dated 8th January 2019). Accordingly, this note responds to each matter raised. It is prudent to note, as part of consideration of all comments, there has been a revision of the development proposals. These are detailed further in Section 2.

1.1.3 Following introduction to the revised development proposal, this note seeks to respond to and clarify the following matters as per the TfL comments;

- Matters in Agreement;
- Car Parking;
- Cycle Parking;
- Healthy Streets;
- Delivery and Servicing; and
- Recommended Planning Conditions.

SECTION 2 REVISED DEVELOPMENT PROPOSAL

2.1.1 Following a review of all comments received on the application, the development proposal has been amended. The change can be summarised as follows;

- The 868sqm of commercial floorspace will also be available under Use Classes D1 (excluding place of worship) - the proposed commercial floorspace is unchanged.

2.1.2 Introduction of the D1 land use responds directly to comments from the local authority, who have identified limited, key community infrastructure within the wider masterplan, including a lack of early years provision (i.e. a nursery) as well as medical facilities (i.e. a GP and/or Dental Surgery). In response to this the proposal seeks to address the shortfall by facilitating these uses on site.

2.1.3 For completeness, the potential trip attraction of a D1 use at the site has been considered. For a robust assessment, consideration of both a nursery and a medical use has been undertaken. This should be compared with the accepted trip generation for the employment use as set out within the submitted Transport Assessment (TA), which identified the commercial unit would attract 17 trips in the respective peak hours (i.e. 34 trips with both peak hours combined).

D1 Nursery

2.1.4 Given the anticipated child yield of this development and the circa 400 units at the consented development of 233 – 236 Nestles Avenue, which does not provide for any D uses, it is highly likely that any early year's provision at this development would be to accommodate demand from the immediate masterplan area, i.e. within a catchment of 400m.

2.1.5 The TRICS database is limited and does not provide any multi-modal surveys for nurseries to allow for a person trip rate to be derived, i.e. vehicle surveys only. In addition, the three vehicle surveys are not representative to this proposal being located in poor PTAL locations (PTAL 1b or 2), as well as a number of sites with free on-site car parking.

2.1.6 The alternative is to consider the likely number of children and staff at the site. One TRICS survey (survey ref: RB-04-D-02) is representative in floor area (although not PTAL (at 1b) or parking (36 spaces). This provides a useful indication of the number of likely trips during the peak periods.

2.1.7 This identifies that the site could be expected to accommodate up to 67 children, with 13 members of staff. Reviewing the recorded survey data, drop-off of pupils primarily occurs between 08:00 and 09:00. However, very limited trips occur during the PM peak period, with collection of pupils mainly occurring between 15:00 and 16:00.

- 2.1.8 Notwithstanding the above, given the site location it is highly likely that any early year's provision at this development would be to accommodate demand from the immediate masterplan area, i.e. within a walking distance.

D1 GP Surgery

- 2.1.9 As with the potential nursery, the inclusion of a D use is intended to address the demand from the immediate local area. The TRICS database has been considered to obtain representative trip rates for such a use, as summarised in Table 2.1 below.

Table 2.1 - D1 GP Surgery Person Trip Rates and Trip Attraction

	AM Peak Hour (0800 – 0900)			PM Peak Hour (1700 – 1800)		
	In	Out	Two Way	In	Out	Two Way
Trip Rate	1.218	0.295	1.513	0.701	1.366	2.067
Person Trips (868sqm)	11	3	13	6	12	18

Source: TRICS 7.6.1

- 2.1.10 As shown in Table 2.1, the use of the commercial space as a GP surgery, some 31 person trips can be anticipated across both peak hours. This compares to 34 trips as anticipated for a 'B' use.
- 2.1.11 On the basis of the above assessments, the potential for a D1 use at the site results in negligible changes from the previously assessed position. Indeed, this use has been introduced since there is an identified short-fall for such a key community infrastructure in the immediate masterplan area and therefore were a D1 use to come forward, it would serve the immediate community.
- 2.1.12 On this basis, the assessment of the B use as undertaken within the TA remains the reasonable worst-case given trips will be attracted from greater distances on the local highway and public transport networks.

SECTION 3 TFL COMMENTS

Matters in Agreement

- 3.1.1 The TfL comments acknowledge that the proposed site access arrangement is ***acceptable in strategic transport terms***, the trip assessment has used an ***acceptable approach*** and the site proximity to a

number of bus services and the scale of bus passenger trip generation means **TfL does not request any financial contributions towards mitigating the impact of the development** on the bus network.

Car Parking

- 3.1.2 The development is car-limited, with no standard car parking to be provided. TfL strongly support this approach.

“The proposed car-free nature of the development is welcomed and strongly supported... all of which will have active electrical vehicle charging facilities which is welcomed, in line with draft London Plan Policy T6”

- 3.1.3 The TfL comments continue;

“Whilst this provision is in accordance with standards from the outset of development, in order to fully conform to draft London Plan policy T6.1, it should be demonstrated how up to 5 additional residential disabled parking bays can be provided in the future upon request. The applicant has stated that this cannot be provided on site due to site constraints and has detailed alternative arrangements in accordance with Accessible London SPG guidance.

It is proposed to utilise existing car club parking, within the Nestles Factory site development, to address the shortfall in accessible car parking provision on site, however it is not clear if there will be sufficient capacity to meet this demand, nor if these spaces are accessible for disabled users. The applicant should therefore submit additional supporting information in order to persuade TfL that this is a viable alternative to the provision of disabled parking on site.”

- 3.1.4 It is noted that TfL do not dispute utilising the Accessible London SPG where the full compliant of typically anticipated blue badge parking (i.e. 10% of dwellings) cannot be provided on site. Indeed, it notes a number of other options which can and should be considered, including the potential for on-street provision, charging of mobility scooters within the site, accessibility to the public transport network, as well as car club vehicles, all of which the development provides for.
- 3.1.5 First, further analysis can be undertaken to better understand the likely demand for blue badge parking. This can be assessed by way of reference to data recorded by the 2011 Census and the National Travel Survey (NTS)/Transport Survey of Great Britain (TSGB). Table TSGB1208 records the number of blue badges held within Local authorities across England, within which it is noted that 11,367 are held within Hillingdon. With regard to the population, the ONS recorded a population of 302,343 for Hillingdon in mid-2017.
- 3.1.6 Accordingly, some 3.8% (11,367/302,343) of the population within Hillingdon therefore hold Blue Badges, which when applied to the proposed 81 units would see approximately three units within

which an occupier would hold a blue badge. Accordingly, the provision of three spaces would be sufficient to meet anticipated demand.

- 3.1.7 This proportion also assumes that all those with a blue badge would drive, therefore representing a 'worst case' scenario.
- 3.1.8 Further analysis allows the identification of mode choice (at a local authority level) by those making a journey to work and whose day to day activities are 'limited a lot' or 'limited a little' by a long-term health issue and/or disability (ONS requested table CT0325, October 2014 – derived from public sector information licensed under the Open Government Licence v3.0.).
- 3.1.9 A total of 7,278 trips are made to places of employment from Hillingdon residents by those with a long-term health issue or disability and who are impacted by this. This data demonstrates that just under 50% of those with long-term health issues or disabilities make use of public transport to reach workplaces. This demonstrates the realistic availability of alternative modes of transport available to Hillingdon's mobility impaired residents. It is considered that this would also apply to other journey purposes.
- 3.1.10 On the basis of the above, it can be considered the provision of three on-site spaces will be sufficient for the anticipated blue badge demand at the development. In addition, any mobility impaired residents will have the ability to charge mobility scooters within units, be picked-up/dropped off adjacent to the site and have access to public transport at the fully accessible Hayes and Harlington station (and associated bus stops) once Crossrail works have completed.
- 3.1.11 Whilst all the above will be available, TfL have requested clarification capacity will exist as a result of the car club vehicles provided within the adjacent Nestle Factory site. At least five vehicles will be provided within this development, with an agreement for a further five vehicles subject to initial uptake. Correspondence with Zipcar indicates they consider the development can be accommodated in the existing network (as per page 4 of the Zipcar Proposal, provided at Appendix A). The applicant has agreed to offer three years of free car club membership and demand for spaces will be monitored by Zipcar.

Cycle Parking

- 3.1.12 TfL comments have requested the following:
- Four additional residential long-stay cycle parking spaces;
 - Supporting end of journey facilities for the commercial unit;

- At least 5% of provision allowing for the fixing of larger/adapted cycles; and
- Clarification as to the location of short-stay cycle parking.

3.1.13 As a result of these requests, the architect has now accommodated four additional long-stay cycle parking spaces and can be seen on revised drawings provided at Appendix B. Cycle parking has been orientated to allow 5% of provision to accommodate larger/adapted cycles.

3.1.14 With regards to the supporting end of journey facilities, these will be accommodated upon fit out of the commercial unit, along with toilets, etc. The short-stay cycle parking is located beneath the building where it crosses the site access, providing informal covering of the cycle parking spaces.

Healthy Streets

3.1.15 TfL have noted;

“Whilst details of the existing pedestrian and cycle have been provided, quality assessments such as PERS and CLoS audits have not been carried out as part of the application. It is recommended that this is undertaken, in order for assessment of the current local network, and if any potential improvements are required... The applicant should undertake a Healthy Streets Check for Designers to demonstrate how the proposals will deliver improvements that support the ten Healthy Street indicators, in line with draft London Plan policy T2. In order to deliver improvements which support the ten Healthy Streets indicators, the applicant could provide places to stop and rest, shade and shelter and things to see and do, within the red line boundary”

3.1.16 Given the significant changes proposed along Nestles Avenue, termed the Nestles Avenue Sustainability Corridor, there is limited necessity for developments to assess and consequently make piecemeal improvements. Indeed, as acknowledged within the TfL comments and also detailed within the TA, the Nestle Factory site have proposed giving over land to allow the delivery for a segregated footway, separate cycle way and widened carriageway (for parking) and green space. The proposal for this site has simply extended the proposals for the adjacent site to allow its delivery.

3.1.17 Delivery is to be facilitated by the London Borough of Hillingdon and the Nestle Factory site proposes to transfer the necessary land and make a financial contribution for delivery of the sustainability corridor. Therefore, detailed design of the proposals which should satisfactorily pass the Healthy Streets check, will be for the London Borough of Hillingdon to confirm. This arrangement is also proposed for this site.

Delivery and Servicing

3.1.18 TfL has noted the following;

"It is proposed that servicing will be undertaken from a new half-on/half-off street loading bay on Nestles Avenue, which is not considered acceptable in strategic terms and is strongly opposed. It is likely that this proposal will impact on the proposed highway and cycleway improvements on Nestles Avenue."

- 3.1.19 It is acknowledged insufficient justification was provided in the TA to demonstrate the reason this option has been progressed. Firstly, the TA did acknowledge that the size of the site does not give rise to the possibility of on-site servicing. This is because the London Borough of Hillingdon will expect vehicles to turn wholly within the curtilage of the site and enter and exit the site in a forward gear. Given the need to re-provide commercial floorspace to 50% as per the masterplan, there is no possibility of accommodating movements from delivery and servicing vehicles (the refuse vehicle in Hillingdon is circa 11m in length) in this manner.
- 3.1.20 Secondly, as is noted in TfL's comments, a high-quality walking and cycling route is proposed along Nestles Avenue. As such, we wish to limit, and ideally completely restrict, the need for large vehicles to cross the footway/cycleway. Therefore, on-street servicing adjacent to the site is considered the most appropriate option to ensure pedestrian and cyclist movements are prioritised. This justification was put to the TfL officer who attended the GLA pre-application meeting (Tim De Laat), where it was noted this was a sensible approach and welcomed. A half-off, half-on arrangement was also proposed to prevent the need for any diversion/kink in the footway and cycleway, which would be necessary were a full loading bay provided.

Recommended Planning Conditions

- 3.1.21 Planning conditions requiring final versions of a Delivery and Servicing Plan, Construction Logistics Plan and Residential Travel Plan are common across London and accepted for this application.

APPENDIX A. ZIPCAR PROPOSAL



Nestle's Avenue **London Borough of Hillingdon** **i-Transport**

Proposal: July 2018

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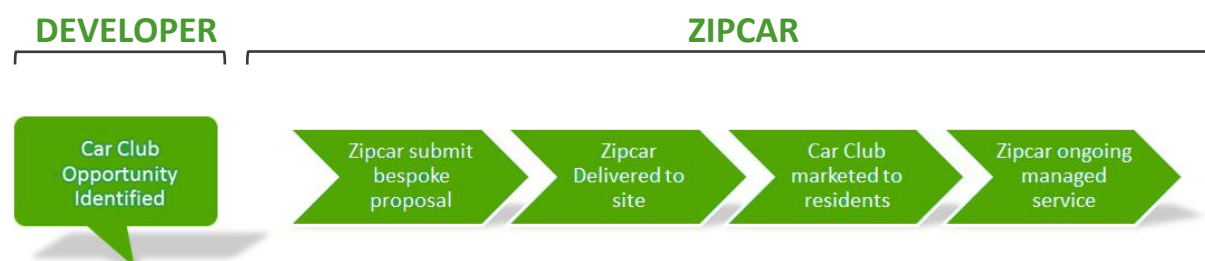


Zipcar & Property Developments

Zipcar works with an ever increasing number of Property Developers, Transport Consultants and Housing Associations across the UK to:

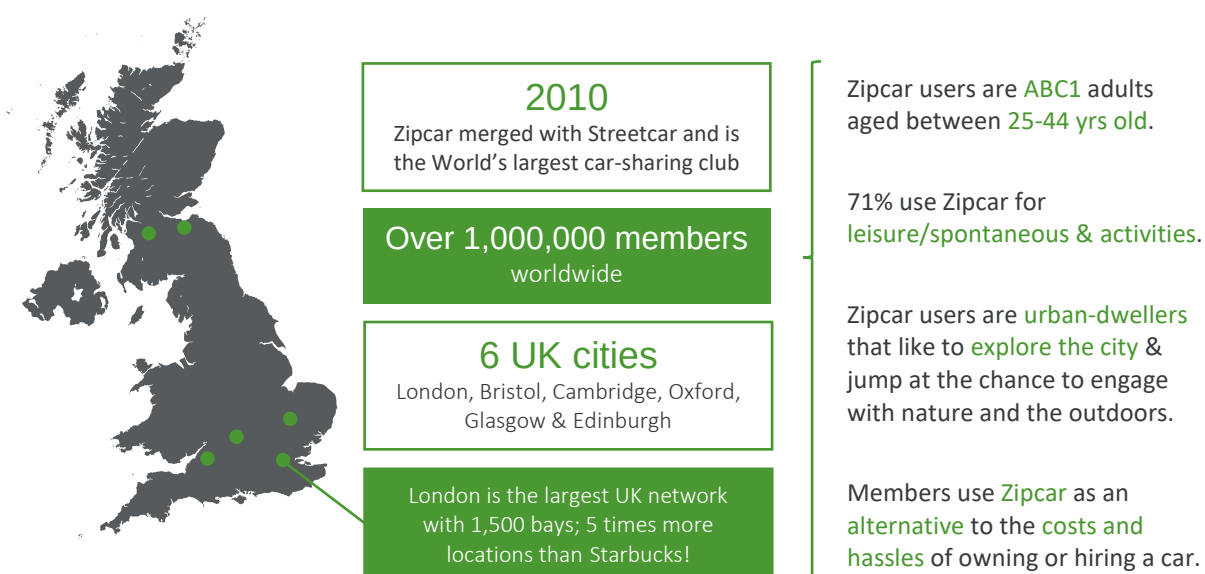
- ✓ Increase the likelihood of gaining planning permission on a site.
- ✓ Addressing specific Section 106 or Travel Plan requirements.
- ✓ Reducing the need to provide costly private parking.
- ✓ Act as a useful marketing tool to help sell properties with a limited parking provision.

Working with Zipcar – 5 Simple Steps



What is Zipcar?

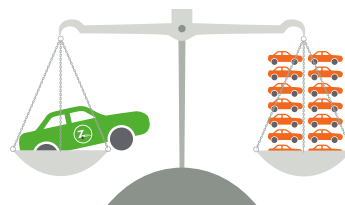
Zipcar is a pay-as-you-go car club designed to provide members with access to cars and vans as quickly and conveniently as possible with the least amount of hassle. Our team is passionate about bringing this innovative concept to every urban street as a simpler, more efficient, more sustainable way to use a car.



A Sustainable Transport Solution

A large proportion of your future residents may have a private vehicle, but may not really need one. They may commute to work using public transport and just have a car for occasional use. A relationship with the world's largest car sharing club would definitely assist in reducing the carbon footprint of your residents, provide a convenient and easily-used service, and save them a substantial amount of money.

Every Zipcar takes an average of 10-15 privately owned cars off the roads of the UK, because members often sell (or don't replace) a car when they join.



Zipcar is a service that benefits the whole community. We have found that car club members choose to drive a car less after joining Zipcar; the average car club member only actually clocks up between 403 and 414 miles a year which is significantly less than private vehicle owners. This is because they both make better use of public transport and think much harder about their transport options according to what they need to achieve and the cost associated with that decision.

Not only this but car club vehicles are typically between 10% and 33% more efficient in terms of carbon dioxide emissions per KM travelled, in comparison to the average car, because operators chose new and fuel efficient models.



Using Zipcar

The Zipcar process has been designed to provide simplicity and little administration – there are no depots or deposits involved (headaches typically found with regular car hire). Once the person has become a member there is no further form filling required to hire a vehicle anywhere in the world.



join



reserve



unlock



drive

Development Viability

Zipcar has been operating in the borough of Hillingdon since 2013 and is now working in partnership with the council to provide car clubs on-street to residents.

In our opinion a car club could work well at this location given support from the developer in the early phases of the development. The current proximity to local transport links is good (approximately PTAL 5) which is encouraging for the car club's chances of success, as synergy with public transport links is a key contributor to good car club performance. This makes it likely that the residents of this development will not need a car for work – essential to the success of the scheme.

The low parking on site should ultimately ensure good uptake of the car club. We normally rely on a parking ratio of less than 0.7 to guarantee car club success.

A developer funded marketing package will help ensure demand for the car on site; the more we are able to incentivise people to try the service, the more people will use it and consequently the time taken to reach commercial viability will be minimised. We have a number of proposals where we have committed to install vehicles and if we are successful on these schemes we would recommend that residents use this existing network of vehicles. We have up to 5 bays scheduled for 2020 and we would recommend reviewing this proposal closer to the occupation date of the project.

Nestle's Avenue Site Proposal

Zipcar recommends that residents use the existing network. Zipcar will provide a fully managed service, which includes the following:

- Offering three years membership to all 85 homes
- Designing all marketing collateral for the development communications team
- Managing the sign-up process (including licence and insurance eligibility processes)
- Monitoring resident and development queries and providing reports (if required as part of S106 requirements) post launch

This comes to a total contribution of £8,800+VAT. This sum is to be paid prior to the date of first occupation.

In exchange Zipcar would commit to a contractual obligation to run the car club operation at the development for a minimum of three years. Each resident that signs up during the three years will receive three years' free membership and Zipcar will offer £50+VAT driving credit per unit at no further cost to the developer. **A contribution of £4,250+VAT from Zipcar.**

Zipcar will provide 1 year's free business account (usually £119) for any commercial entity operating from or in conjunction with the site at no further cost to the developer.

Marketing Proposal

A free membership to Zipcar is an excellent marketing tool to utilise with prospective buyers who, due to low parking ratios and parking restrictions, are unable to have their own vehicle on site. We would market the free memberships as a benefit paid for by the developer that provides residents with a cheaper, greener more convenient alternative to private car ownership. In this way Zipcar

adds real value to the development and is an excellent solution to the recurring problem of prospective residents not being able to have their own vehicle on site due to a lack of space.

Developer communication

It is vital that the development's communications team promotes and supports the growth of the car club on site. Having a presence online either on the development website or through the residents' portal will ensure that all residents are aware of the transport modes and offers available to them and speed up uptake. Historically we have found most residents will use the service either to move into the property or for the subsequent furniture run within the first three months of occupation. Our marketing team will be able to provide copy or banners for the site, all of which will direct residents to a bespoke landing page educating them about the service.

Zipcar would promote its service to the residents of the development through a number of ways.

Bespoke marketing material: This would outline the offers your residents are entitled to. We find that this is crucial in generating early interest in the scheme; these would be part of each residents welcome pack. Additionally we would recommend that a mail shot is sent at a later date reminding residents of the service.

Advertising within the development: Zipcar would advertise within the development itself through posters and leaflets in communal areas.

The Zipcar Fleet

Zipcar has a vehicle type for every occasion. This will ensure that your residents get the best possible service, and can find a vehicle to suit their needs. Zipcar membership also includes Zipvan membership – providing our members with convenient access to larger vehicles when required.

Our vehicles are best in class from an emissions perspective. A Zipcar lives in the fleet for a maximum of eight months, ensuring our members are driving the most modern and efficient fleet in any car club across the world.

Model	Weekday	Weekend
	Hourly / Daily	Hourly / Daily
Toyota Yaris / Ford Fiesta	£6 / £54	£7.50 / £65
VW Golf / Ford Focus	£7 / £64	£8.50 / £75
Toyota Prius (PHEV)	£7 / £64	£8.50 / £75
Audi A3	£8 / £74	£9.50 / £85
Ford CMAX (7 Seater)	£10 / £94	£11.50 / £105
VW Transporter	£10 / £89	£11.50 / £105

Fuel, insurance and 60 free miles per 24 hours are included. Additional miles are 25p per mile (29p for premium vehicles and vans).

APPENDIX B. REVISED PLANNING DRAWINGS

