



9 Nestles Avenues, Hayes

Transport Assessment

Client: Healey Development Solutions (Hayes) Ltd

i-Transport Ref: VP/JN/LC/ITL14154-017a

Date: 30 July 2020

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Quality Management

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SECTION 1 INTRODUCTION

1.1 Context

- 1.1.1 Healey Development Solutions (Hayes) Limited has appointed i-Transport LLP to provide transport and highway advice with regard to a planning application for a residential redevelopment at 9 Nestles Avenue, Hayes, within the London Borough of Hillingdon (LBH).
- 1.1.2 As such, this Transport Assessment (TA) has been prepared by i-Transport LLP as part of a planning submission for the re-development of the site. It should be read in conjunction with the Framework Travel Plan (FTP) and Delivery and Servicing Plan (DSP) which accompany the application.
- 1.1.3 The application site currently comprises a single building, totalling some 1,718sqm of B1c/B2 commercial floorspace. The remainder of the site is taken up by open space used as forecourt parking. Access is taken directly from Nestles Avenue.

1.2 Proposed Development

- 1.2.1 The proposed development is a residential scheme comprising 103 residential units over 11 floors. The development is proposed to be car-lite, with the provision of 14 car parking spaces, four of which are allocated for disabled users, and 178 long-stay cycle parking spaces (and four short stay spaces).
- 1.2.2 The planning application is referable to the Mayor of London under Category 1C of the Mayor of London Order 2008 due to the height of the proposed building. The Greater London Authority (GLA) will in turn consult with Transport for London (TfL) in relation to the transport impact of the proposal, although LBH remains the Local Highway Authority (LHA) responsible for the local highway network.

1.3 Scope

- 1.3.1 This TA has been prepared by i-Transport LLP to assess the transport impact of the development proposal with respect to relevant national, regional, and local policy and guidance, and to identify any appropriate mitigation measures should they be required. This document has been prepared in accordance with TfL's Transport Assessment Guidance.

- 1.3.2 Pre-application discussions have been held with LBH and the proposals have been developed in accordance with those discussions and also against the background of the Appeal Decision awarded for the site in early 2020.

1.4 Planning History

- 1.4.1 The site was the subject of a previous planning application for 81 residential units and 868sqm of commercial floorspace, submitted in December 2018 (application ref: 51175/APP/2018/4260). That scheme was proposed as car-free with provision of four blue badge spaces only, three for the residential element of the scheme and one for the commercial element of the scheme. Thus, the parking provision for the residential element of the scheme previously was 0.04 spaces per unit).
- 1.4.2 That application was refused by LBH with 11 reasons for refusal, of which there were three highways reasons for refusal. Additional post-determination discussions resulted in two of the three highway reasons being removed and a single highways reason for refusal, relating to the car-free nature of that proposal and LBH's perceived impact on highway safety that would arise from a parking provision of 0.04 spaces per unit overall (provided as three spaces for disabled persons only) was taken to Appeal.
- 1.4.3 Whilst the Appeal was dismissed on other matters, the Inspector concluded the car-free nature of the proposal for residential development in this location was entirely appropriate and acceptable. The full Appeal decision (appeal ref: APP/R5510/W/19/3230503) is included at Appendix A to this report and offers some 19 paragraphs from the Inspector in respect of transport and specifically parking and their conclusions on whether this would have an impact on highway safety.
- 1.4.4 The Inspector concluded, in respect of parking and LBH's perception that car-free development (with provision of 0.04 spaces per unit provided as three spaces for disabled persons only) would not result in a detrimental impact on highway safety that they found ***'no conflict with either existing or emerging policies, with the emerging policies accepted by the Council as attracting substantial weight in this appeal, and other guidance. I find no conflict either with the Framework, which confirms that development should only be prevented or refused on highways grounds if there would, among other things, be an unacceptable impact on highway safety'***.

- 1.4.5 The Inspector also made a costs award against LBH in respect of transport reflecting their certainty that the transport reason for refusal, in respect of car-free development and a perceived impact on highway safety, should not have been pursued by LBH and that the development should not have gone to Appeal on transport and highways grounds at all. The full costs decision is included at Appendix B to this report.
- 1.4.6 All other matters relating to transport, including the methodology of the Transport Assessment, trip generation analysis and details of the scheme including provision of a loading bay and internal layout and arrangement of the proposed car parking spaces were accepted by LBH prior to the Public Inquiry.
- 1.4.7 This Transport Assessment has been prepared against the same methodology adopted for the previous scheme.

1.5 Structure of Report

- 1.5.1 The remainder of the TA is set out as follows:
- Section 2 summarises the national, regional, and local policies and guidance relevant to the application;
 - Section 3 summarises the existing site use and local services and facilities, and establishes the anticipated future infrastructure and services improvements proposed as part of the wider regeneration of the area;
 - Section 4 sets out the development proposal in detail, including the access arrangements for all travel modes;
 - Section 5 provides an assessment of the anticipated total and net change in multi-modal movements resulting from the development; and
 - Section 6 provides a summary of the TA and its conclusions.

SECTION 2 POLICY CONTEXT

2.1 Overview

- 2.1.1 This section sets out the regional and local transport policies to be considered. It also refers to the appeal scheme and this development proposal where appropriate.

2.2 National Transport Policy

National Planning Policy Framework (February 2019)

- 2.2.1 The National Planning Policy Framework (NPPF) sets the following three tests in relation to transport and highways matters:

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

- *Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- *Safe and suitable access to the site can be achieved for all users; and*
- *Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."* (ref: NPPF, Paragraph 108)

- 2.2.2 The NPPF further states that development: "should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." (ref: NPPF, Paragraph 109).

2.3 Regional Transport Policies

Adopted Policy

The London Plan (March 2016)

- 2.3.1 The 2016 London Plan remains the currently adopted version and sets out the strategic targets for the spatial development of London to 2031 and beyond. From a transport perspective, the Mayor intends that London will be a city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system which actively encourages more walking and cycling.

2.3.2 To achieve this aim, a series of policies have been developed that seek to ensure that new developments:

- Do not have an adverse effect upon the existing transport network and that impacts are assessed within a Transport Assessment (Policy 6.3A);
- Provide secure, integrated and accessible cycle parking facilities, alongside on-site changing facilities (Policy 6.9B);
- Incorporate high quality pedestrian links that connect with and improve the existing pedestrian environment (Policy 6.10B);
- Provide parking in accordance with adopted parking standards including for disabled people, the minimum cycle parking standards, and provision for delivery and servicing (Policy 6.13); and
- Operate Delivery and Service plans to minimise disruption with larger vehicles (Policy 6.14B).

2.3.3 The current car and cycle parking standards relevant to the site are summarised in Tables 2.1 and 2.2 respectively.

Table 2.1: London Plan Car Parking Standards

Land Use	Vehicle Parking Standards (Maximum)
Residential (Land Use C3)	Up to 1.5 spaces per unit (PTAL 2-4) Notes: All developments in areas of good public transport accessibility in all parts of London should aim for significantly less than 1 space per unit. Adequate parking spaces for disabled people must be provided preferably on-site. 20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.

Source: London Plan 2016

Table 2.2: London Plan Cycle Parking Standards

Land Use	Minimum Cycle Parking	
	Long Stay	Short Stay
Residential (Land Use C3)	Studio/1 bed: 1 space 2 beds +: 2 spaces	1 space per 40 units

Source: London Plan 2016

- 2.3.4 The proposed development is provided in line with the requirements of the Adopted London Plan which seeks ***'all developments in areas of good public transport accessibility in all parts of London should aim for significantly less than 1 space per unit. Adequate parking spaces for disabled people must be provided preferably on-site'***.

Mayor of London Transport Strategy (2018)

- 2.3.5 In March 2018, the Mayor published his Transport Strategy, which sets out the future of transport in London. The strategy includes a target for 80% of all trips in London to be made by sustainable modes of transportation by 2041. To achieve a mode share of 80% of trips by sustainable modes, new developments, especially those in Opportunity Areas and high-PTAL areas, are expected to aim for sustainable transport mode shares of 95%-99% of trips.

Emerging Policy

The Draft London Plan (December 2019)

- 2.3.6 The emerging London Plan has reached the 'Intend to Publish' stage, although the Secretary of State has exercised his power under Section 337 of the Greater London Authority Act 1999 to direct that the Mayor of London cannot publish the final version of the London Plan without incorporating various alterations.
- 2.3.7 Within the suggested changes, there are some changes to parking standards in lower PTAL, outer London areas. However, as this proposed development is located in a PTAL 4/5 opportunity area location where no amendments have been suggested, the requirement for car-free development is still included (Policy T6.1). Accordingly, the policies referred to below have been considered by the examining Panel, Mayor of London and Secretary of State and none have determined changes are needed in a high PTAL context. Therefore, the policies should carry weight in determining this application. Indeed, it was confirmed by the Inspector in respect of the previous Appeal that the emerging London Plan attracted significant weight in that Appeal.

Thus, it still attracts the same weight now. At the time of preparing this Transport Assessment the emerging London Plan has not been formally adopted.

- 2.3.8 The car and cycle parking standards in the Draft London Plan are summarised in Tables 2.3 and 2.4 below. It is prudent to note that the site is located within the Heathrow Opportunity Area and therefore specific standards apply.

Table 2.3: Draft London Plan Car Parking Standards

Land Use	Vehicle Parking Standards (Maximum)
Residential (Land Use C3)	Up to 0.5 spaces per unit (Outer London Opportunity Areas) Note in PTAL 5 and above locations, development is expected to be car-free expect for disabled provision. Notes: Disabled persons parking should be provided for all new residential developments. 20 per cent of all spaces must be for electric vehicles with passive provision for all remaining spaces in the future.

Source: Draft London Plan 2018

Table 2.4: Draft London Plan Cycle Parking Standards

Land Use	Minimum Cycle Parking	
	Long Stay	Short Stay
Residential (Land Use C3)	Studio/1 bed: 1 space 2 beds +: 2 spaces	1 space per 40 units

Source: Draft London Plan 2018

- 2.3.9 It was confirmed at paragraph 57 of the Inspector's Appeal Decision (Appendix A) in respect of the Appeal on the previous scheme '**Part A of policy T6 of the emerging London Plan states that parking should be restricted in line with levels not only of existing, but also future public transport accessibility and connectivity. In addition, part B confirms that car-free development should be the starting point for all development proposals in places that are, or are planned to be, well-connected by public transport, with developments elsewhere to be car-lite. Policy T6.1 sets out that new residential development should not exceed the maximum standards set out in corresponding Table 10.3** [relevant excerpts of which are provided at Table 2.3 above]'

2.4 Local Transport Policies

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

- 2.4.1 The Hillingdon Local Plan - Part 1 - Strategic Policies is the key strategic planning document for Hillingdon and will support delivery of the spatial elements of the Sustainable Community Strategy. It sets out a long-term vision and objectives for the Borough. The primary matter relating to Transport notes Hillingdon has an overall aim of improving quality of life and reducing private car dependency.

London Borough of Hillingdon Local Plan: Part 2 – Site Allocations and Designations (January 2020)

- 2.4.2 Policy SA 5 is a site allocation policy relating to 'Land to the South of the Railway, including Nestle Site'. The policy lists key principles for all sites, which in relating to highways and transport notes all proposals will be expected to;

- ***Provide pedestrian links to Hayes Town Centre and key transport nodes;***
- ***Provide appropriate community infrastructure to support the overall quantum of development including education, children's services, health, transport, community and sport/recreation facilities as necessary; and***
- ***Sufficient setback from Nestles Avenue to allow for the introduction of potential public transport improvements.***

- 2.4.3 The final paragraph of the policy notes;

"Subject to the outcome of area specific studies, the Council may consider an approach to car parking which departs from the standards set out in this plan, if supported by relevant public transport improvements and other mitigating measures."

- 2.4.4 The Inspector confirmed within their decision for the previous scheme that ***'the final paragraph of policy SA 5 sets out that, subject to the outcome of area specific studies, an approach to parking which departs from the standards in the Local Plan may be considered if supported by relevant public transport improvements and other mitigating measures'***.

- 2.4.5 The Inspector further confirmed that the extensive evidence presented by the appellant in the previous Appeal i.e. that which demonstrated the accessibility of the site and considered likely car ownerships and characteristics of travel for future occupiers, was ***'broadly equivalent to such a study. It demonstrates that the appeal site is in one of the most accessible locations in the Borough, close to Hayes town centre with convenient access to shops, services,***

facilities, public transport and active travel opportunities. Given that context, and the imminent increase to PTAL 5, I am in no doubt that the absence of on-site parking and the parking restrictions on the adjacent roads would act as a natural deterrent to car-ownership for future occupiers, informing the decision of future occupiers as to whether the scheme would suit their needs/demands’.

London Borough of Hillingdon Local Plan: Part 2 – Development Management Policies (January 2020)

2.4.6 The Local Plan Part 2, adopted in January 2020, provides revised development management policies and replaces the Unitary Development Plan (1998) saved policies. The relevant policies are as follows:

- ***Policy DMT 1 – Managing Transport Impacts – Development will be required to be accessible by sustainable modes of travel, adequately address delivery, servicing and drop-off requirements and have no significant adverse transport or associated air quality and noise impacts on the local and wider environment. Developments of more than 80 units will be required to prepare a Transport Assessment and Travel Plan.***
- ***Policy DMT 2 – Highways Impacts – Development must provide safe and suitable access for all users;***
- ***Policy DMT 4 – Public Transport - The Council may require developers to mitigate transport impacts from development proposals by improving local public transport facilities and services;***
- ***Policy DMT 5 – Pedestrians and Cyclists - Development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network.***
- ***Policy DMT 6 – Vehicle Parking – Development must comply with the standards outlined at Appendix C in order to facilitate sustainable development. The Council may agree to vary these requirements when:***
 - **the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and/or**
 - **a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations.**
 - **All car parks provided for new development will be required to contain conveniently located reserved spaces for wheelchair users and those with restricted mobility in accordance with the Council’s Accessible Hillingdon SPD.**

2.4.7 The relevant car and cycle parking standards for the land uses proposed are set out in Tables 2.7 and 2.8, respectively.

Table 2.7: LBH Local Plan 2 Car Parking Standards

Land Use	Vehicle Parking Standards (Maximum)
Residential (Land Use C3)	Studio: 0.5 spaces per unit 1-2 bed: 1 – 1.5 spaces per unit 3 beds and above: 2 spaces per unit Notes: Proposals must also accommodate visitor's car parking on-site additional to the above Car parks must be allocated to dwellings

Source: London Borough of Hillingdon Local Plan Part 2 2020

Table 2.8: LBH Local Plan 2 Cycle Parking Standards

Land Use	Maximum Cycle Standards
Residential (Land Use C3)	Studio/1 bed/2 beds: 1 space 3 beds +: 2 spaces

Source: London Borough of Hillingdon Local Plan Part 2 2020

Note: Visitor parking forms part of the standard unless otherwise stated

London Borough of Hillingdon Third Local Implementation Plan (LIP3) (March 2019)

2.4.8 Local Implementation Plans are a statutory document, required by the Greater London Authority Act 1999 and set out how the London boroughs intend to implement the Mayor of London's Transport Strategy within their respective boroughs. Boroughs define their strategy and secure funding for its delivery.

Page 101 of LIP3 continues to state that the overarching aim of the borough's policies i.e. those within their Local Plan Part Two (January 2020);

'is to ensure development in Hillingdon is adequately managed and integrated with its transport networks, including public transport, pedestrian and cycle networks, to enable it to accommodate growth in a sustainable manner'.

It goes on to state that Policies which will contribute towards sustainable travel in new development include:

- ***'locating new development where access by public transport, walking and cycling is possible to serve the developments anticipated needs;***
- ***Requirement of developers to mitigate transport impacts, such as improving public transport facilities;***

- **High quality pedestrian and cycle facilities;**
- **A restrained and balanced approach to car parking, based on the London Plan standards with some variance to reflect local circumstances;**
- **Travel Plans, where required, following TfL good practice guidelines; and**
- **Delivery and Service Plans and Construction and Logistic Plans to aim the efficient and consolidated movement of goods with minimum disruption to local amenity’.**

2.4.9 The local implementation plan continues;

‘Hillingdon will support car-free and car-lite development in areas within the borough that are well connected to sustainable travel options, i.e. Uxbridge station, Hayes and Heathrow. Car-free development facilitates behaviour change for residents from the onset of occupying a dwelling or working in an area that has limited or no parking provision. As such, car free and car-lite development will enable more ‘social streets’ in new development areas, supporting Hillingdon’s objectives and the Mayor’s Vision to make London streets more active. Supporting such developments, will not only address issues of congestion and pollution, but help reduce noise pollution and long-term maintenance of highways’.

2.4.10 Specifically, in respect of Hayes, the area within which this site sits, the LIP3 states on page 102 that ‘

‘In addition, Hayes town centre is now the focus of many new developments, partly in response to the opening of the Elizabeth line (Crossrail). One example is the redevelopment of the former Nestle factory along Nestles Avenue to provide 1,386 new dwellings, 22,663sqm of commercial floor space, as well as office, retail, community and leisure uses. The development was granted planning permission towards the end of 2018. It provides a good example of a transit-oriented development in which the Council has taken a holistic view to satisfying the travel demands of the new residents and a pragmatic approach to the amount of car parking required to support a development’

2.4.11 Thus; LBH accepts that the adjacent Nestles Factory site is a good example of development in an accessible location. This application site lies closer still to Hayes & Harlington railway station than the Nestles Factory scheme.

2.4.12 The proposed development has been developed in direct response to the opportunity to unlock this very accessible site for residential development which can be supported by a wealth of sustainable transport opportunities.

2.4.13 LBH goes on to state on Page 102 of the LIP 3 that:

'..... those residents without access to a car parking space will be unable to park on-street as there is a residents' Parking Management Scheme along Nestles Avenue. As none of the new residents will be able to join this scheme, this will prevent them from parking on-street. Without anywhere to park within the development, or on the surrounding streets, these residents will be discouraged from owning a car, choosing instead to cycle, walk or travel by public transport instead'.

2.4.14 Thus, it is LBH's Policy position that residents without an off-street car parking space will be unable to park on-street since there is a parking management zone and they will not be able to obtain a permit. LBH accepts that since a resident cannot join the permit scheme they will be **prevented** from parking on-street and, even more so, will be discouraged from even owning a car, instead choosing to take up the ample sustainable alternatives available.

2.4.15 This was also supported by the Inspector in their Appeal decision which is clear that, in respect of the previous scheme for 81 units with three car parking spaces for disabled persons *'the Council's case ... failed to recognise that its own policies and related guidance clearly anticipate a behaviour change and a move to car free development. In particular, its own LIP3 includes specific objectives promoting sustainable travel to encourage a reduction in car use and supporting new development environments that prioritise sustainable travel. LIP3 also confirms that car-free development facilitates behaviour change for residents from the onset of occupying a dwelling in an area that has limited or no parking'.*

2.5 Summary

2.5.1 National policy establishes that development should only be prevented where the impact of the development on transport networks is considered 'severe'. In addition, developments should provide safe and convenient access arrangements and be located in areas with opportunities for sustainable travel.

2.5.2 The Inspector provided clarity on interpretation of Policy at the Local and Regional level in paragraph 51 of their Appeal Decision (Appendix A) which states *'Policy DMT 6 of the recently adopted Local Plan Part 2 sets out maximum parking standards for new development'* and in respect of the previous scheme which sought to provide 81 units with three blue badge parking spaces for the residential element and one for the commercial element, the Inspector went on to state *'Inasmuch as the number of spaces would not exceed the maximum standards, there would be no policy conflict. There would be no conflict either, with policy 6.13 of the current London Plan and Table 6.2, which together confirm that all developments in areas of good public transport accessibility in all parts of London (their*

emphasis) should aim for significantly less than one space per residential unit. There was no dispute in this regard that the appeal site currently has a Public Transport Accessibility Level (PTAL) rating of 4, which is categorised as 'Good' by Transport for London (TfL)'.

- 2.5.3** The Inspector also noted in respect of the previous Appeal scheme comprising 81 units and three parking spaces for disabled person, at paragraph 52 of the Appeal decision, that ***'Both the GLA, through its Stage 1 comments, and TfL, set out that the car-free nature of the development proposed is strongly welcomed and supported. I am mindful, in this regard, that a Parking Management Zone is currently in operation along Nestle Avenue and some side streets. The controls restrict on-street parking to residential permit holders only between 09.00-17.00 Monday-Friday. That is complemented with parking restrictions in the form of single yellow lines Monday-Saturday 08.00-18.30. The submitted planning obligation includes provision to preclude future occupiers from acquiring a parking permit for the Zone'.***

SECTION 3 EXISTING CONDITIONS

3.1 Overview

- 3.1.1 This section outlines the baseline transport conditions within the vicinity of the site, including the extant site use, existing highway network, on-street parking controls, public transport accessibility, the local walking and cycling networks, and local highway safety.

3.2 Site Location and Existing Site Use

- 3.2.1 The site is located at 9 Nestles Avenue in Hayes, within the London Borough of Hillingdon. It is bordered by the former Nestle Factory site (soon to be re-developed) to the east, Nestles Avenue to the south, the former Tarbiyyah Primary School to the west and Squirrels Trading Estate to the north.
- 3.2.2 The existing site comprises a single building with two floors, totalling 1,718sqm. The site has recently become vacant but has been used as a Printers and Lithographers and therefore it is assumed it holds a Class B1c/B2 use (this was not disputed by LBH in the previous planning application for the site). Forecourt parking is provided along the site frontage with access taken from Nestles Avenue.

3.3 Extant Site Trips

- 3.3.1 It is understood that the site benefits from an extant B1c/B2 Use Class consent and could therefore reopen and operate within that use class without the need for an amended planning consent. Accordingly, to understand the potential 'existing' trip generation, the TRICS database has been used to derive a vehicular trip rate.
- 3.3.2 Vehicle (only) trip rates for the extant B1c/B2 use have been obtained, as there are insufficient Multi Model sites in the TRICS Industrial Unit category (only one single site is identified, even when including London and the South East region, and this has a floor area of over 6,000sqm and as such is not comparable). The vehicle trip rate sites obtained for the Greater London region are very representative with respect to site location, given both TRICS surveys are located within Hillingdon.

- 3.3.3 The derived vehicle trip rate has been applied to the extant site floor area (1,718sqm), with the resultant trip generation for the AM and PM peak hours shown in Table 3.1.

Table 3.1: Extant B1c/B2 Trip Generation (Vehicles) – 1,718sqm

	AM Peak Hour (0800 – 0900)			PM Peak Hour (1700 – 1800)			12-Hour (0700 – 1900)		
	In	Out	Two Way	In	Out	Two Way	In	Out	Two Way
Trip Rate (per 100sqm)	0.441	0.300	0.741	0.240	0.401	0.641	4.989	5.530	10.519
Vehicular Flow	8	5	13	4	7	11	86	95	181

Source: TRICS 7.5.3. Note: Numbers may not sum due to rounding.

- 3.3.4 Table 3.1 demonstrates that the extant site use could generate circa 13 two-way vehicular trips in the AM peak hour and 11 two-way vehicular trips in the PM peak hour. It is considered the above rates also account for deliveries and servicing movements in the peak hours.
- 3.3.5 This trip assessment is identical to that submitted as part of previous application which LBH did not object to.

3.4 Local Highway Network

- 3.4.1 Nestles Avenue is a single carriageway road with a speed limit of 30mph. Single yellow lines are present on both sides of the carriageway for the majority of Nestles Avenue, including along the site frontage, although marked on-street parking bays are also occasionally located. The yellow lines are subject to No Waiting restrictions between 0800 – 1830, Monday – Saturday.
- 3.4.2 Circa 260m to the west of the site, Nestles Avenue connects to Station Road via a priority junction. To the north, Station Road is a single carriageway road leading to the rail station and Hayes Town Centre, while to the south it heads towards the ASDA Hayes Superstore. Separate ghost island right turn junctions are provided for southbound traffic. Street lighting is provided along the entire road on both sides of the carriageway.
- 3.4.3 Controlled Parking Zone (CPZ) HY2 encompasses local roads including all of Nestles Avenue. This restricts parking to resident permit holders only between 0900 – 1700, Monday to Friday.

Pedestrian Environment

- 3.4.4 Wide, good quality footways are provided on both sides of Nestles Avenue along with street lighting on both sides of the carriageway. There are dropped kerbs and tactile paving at all vehicle crossovers to allow for safe and easy crossing for all pedestrians. There is an informal crossing point, also with dropped kerbs and tactile paving, with a refuge island to the west of the site at the junction with Station Road.
- 3.4.5 Hayes High Street has undergone significant improvements to the pedestrian and vehicle infrastructure. The council was given £4.5 million to improve the town centre after a successful bid was made to Transport for London (TfL). Additional improvements have also been made to Station Road including the junction of Station Road/Nestles Avenue as a result of investment associated with the Elizabeth Line calling at Hayes and Harlington station.

Cycle Network

- 3.4.6 The local area benefits from an extensive network of cycle routes which provide convenient routes to local facilities and train and London Underground stations, as well as Heathrow Airport to the south west. These are detailed in full in the TfL Local Cycling Guide 6. In the vicinity of the site, the Local Cycling Guide identifies most of Station Road as being signed or marked for use by cyclists. This route can be taken south along the High Street eventually connecting to a designated off-road cycle route running parallel to the A4. This extends east towards London and west towards Heathrow Airport.
- 3.4.7 Another off-road cycle route has been designated alongside the Grand Union Canal. This route can be taken west towards Uxbridge.
- 3.4.8 There are also various routes that have been recommended by other cyclists, along quieter or safer roads. These routes can be used to connect designated cycle routes, acting as undesignated continuations of the cycle network. As a result, cyclists can head east into Ealing using a variety of designated off-road, marked and undesignated cycle routes.
- 3.4.9 Within the vicinity of the site, recommended cycle routes along Nestles Avenue, Roseville Road and Cranford Drive can be used to access Cranford Park Academy. Additional facilities that can be directly accessed via the cycle network include Khalsa Primary School, Cranford Primary School and Heathpark Golf Course. Additional locations that can be directly accessed via the cycle network include Greenford, Hounslow, West Drayton, Southall and Hayes.

Future Highway Network

- 3.4.10 All development on northern side of Nestles Avenue is expected to reserve land to LBH for delivery of the 'Nestles Avenue Sustainability Corridor' which will allow various highway improvements which are expected to include the widening of the Nestles Avenue carriageway, inset parking spaces, bus stop infrastructure, new footways and/or a fully segregated cycle lane as well as landscaped areas fronting development parcels. The final detailed design will be prepared by LBH.

3.5 Collision Data Analysis

- 3.5.1 Under the previous application, five years of Personal Injury Accident (PIA) data to end of February 2018 was obtained for Nestles Avenue and Station Road (between North Hyde Road and the train station). A total of 14 accidents have been recorded in the study area over the time period, all of which resulted in slight injuries.
- 3.5.2 A further request has been made to extend the study period to the most recent period available to 31st December 2019. During this time, a further eight accidents have been recorded of which two have resulted in serious injuries both to pedestrians. These were both on Station Road at the location of the existing zebra crossing. Due to the way that data is now presented by TfL due to data protection, it is not possible to determine how the most recent PIAs occurred in any detail. The TfL output is provided at Appendix C.
- 3.5.3 However, it is evident that the number, severity or the causes of the accidents do not suggest a highway defect issue. Whilst any accident is regrettable, there does not appear to be a common causation factor at any one particular location to suggest a particular highway safety problem on the local highway network. With respect to the accidents at the zebra crossing, this section of Station Road has recently been subject to highway improvements associated with the redevelopment of Hayes and Harlington Station in preparation for Elizabeth Line services.

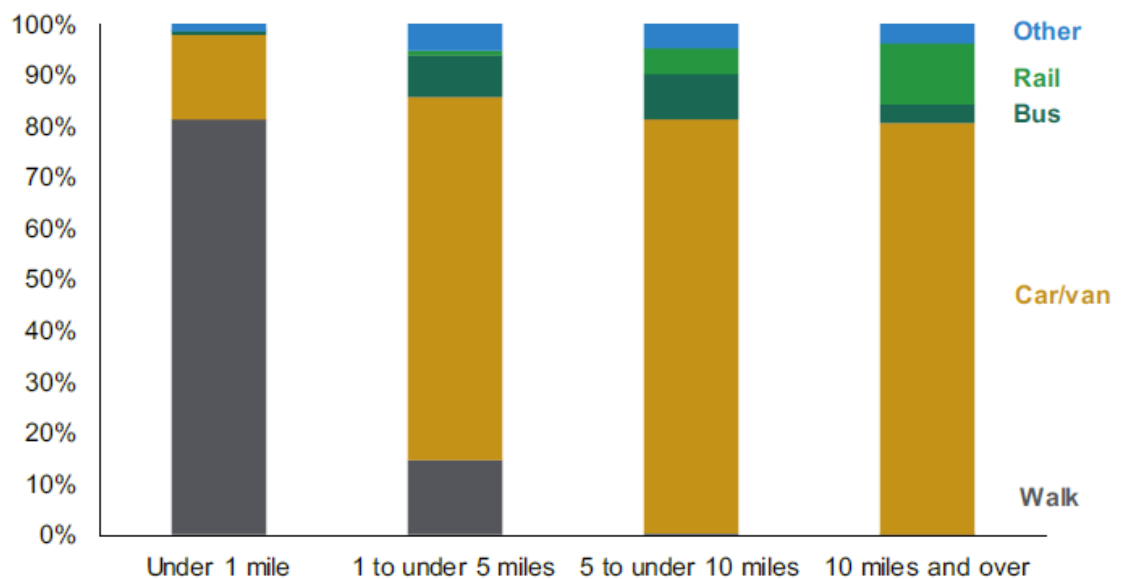
3.6 Local Facilities

- 3.6.1 A key aim of regional and local policy is the delivery of sustainable development. This in part, is achieved by the accessibility of sites to a good range of everyday services and facilities.
- 3.6.2 In this regard, Manual for Streets states that 'Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800m) walking

distance of residential areas which residents may access comfortably on foot.' (Ref: *Manual for Streets paragraph 4.4.1*). However, this is not an upper limit.

- 3.6.3 The National Travel Survey: England 2017 has identified the mode share journeys of different lengths (as shown in Image 3.1) and found that walking was the most frequent mode for short trips in 2017, where 81% of trips under one mile (c. 1,600m), and 30% of trips between one and two miles (c. 3,200m) were walks (Ref: *NTS Table 0308*).

Image 3.1: Mode Share of Trips by Main Mode for Different Trip Lengths: England, 2017



Source: National Travel Survey: England 2017

- 3.6.4 A summary of the local facilities and services within the vicinity of the site and their respective walking and cycling distances is provided in Table 3.1. The colour coding highlights the locations within 800m, 1,600m and 3,200m walking distance.

Table 3.1: Distances and Travel Time to Key Destinations

Destination		Approx. Distance from Site (metres)	Walking journey time (mins)	Cycling journey time (mins)
Retail	Asda Superstore	450	5	2
	Tesco Esso Express	550	7	2
	Nearest ATM (Barclays)	600	7	2
	Hayes Town Centre	700	8	3
	Iceland	800	10	3
	Post Office	850	10	3
	Lidl	1,100	13	4
Education	Cranford Park Academy	850	10	3
	The Global Academy	1,000	12	4
	Harlington School	1,600	19	7
	Minet Nursery and Infant School	1,900	23	7
	Minet Junior School	2,000	24	8
	Uxbridge College – Hayes Community Campus	2,100	25	9
Leisure	London Motor Museum	170	2	<1
	Grand Union Canal Walk	650	8	3
	Botwell Green Library	1,100	13	4
	Botwell Green Sports and Leisure Centre	1,100	13	4
	Lake Farm Country Park	2,000	24	8
Health	Hayes Medical Centre	350	4	1
	The Hayes Dental Practice	500	6	2
	Hayes Town Medical Centre	700	8	3
	Hayes Town Pharmacy	1,100	13	4

Source: i-Transport. Note: All distances taken from pavement outside 9 Nestles Avenue, to the south of the site.

Key:

	Within a 'Walkable Neighbourhood' (800m)
	Within a distance where most people (circa 81%) will walk (1,600m)
	Within a distance where walking is a realistic alternative to car use and where some people (circa 30%) are still prepared to walk (3,200m)

3.6.5 It is clear from Table 3.1 that a good range of every day services and facilities will be accessible to future residents of the site, on foot or by bicycle.

3.7 Public Transport

National Rail

- 3.7.1 National Rail services can be accessed from Hayes & Harlington railway station, circa 400m from the site, operated by TfL Rail and located within Travelcard Zone 5. Approximately eight trains per hour operate between London Paddington and Reading/Didcot/Heathrow Airport.
- 3.7.2 Hayes & Harlington station will benefit from introduction of the Elizabeth Line. The Elizabeth Line is a significant piece of new railway infrastructure adding approximately 10% of new railway capacity and new/easier journey opportunities.
- 3.7.3 Stations along the route are also being upgraded with Hayes & Harlington station to benefit from a new footbridge with four new lifts to provide step free access to every platform, platform extensions and new replacement canopies and new lighting, customer information screens, station signage, help points and CCTV.
- 3.7.4 From December 2022, when the full route opens, up to ten Elizabeth line services an hour will allow passengers from Hayes & Harlington to travel to Reading or Heathrow in the west or through the central London tunnels to Essex and southeast London via Liverpool Street and Canary Wharf.

Buses

- 3.7.5 The nearest bus stop is circa 350m from the site on Station Road (Stop K) and is served by 8 different northbound bus services to a range of destinations, including Northolt, Uxbridge and Heathrow Airport Terminal 5. It is provided with a shelter and equipped with real-time Countdown information. The bus stop outside Hayes & Harlington railway station (Stop E), circa 400m from the site, is the closest stop providing southbound services. All services which serve these stops are summarised in Table 3.2 overleaf.

Table 3.2: Local Bus Services

Bus No.	Route	Typical Frequency (per hour, per direction)		
		Mon – Fri	Sat	Sun
90	Feltham – Hayes – Northolt	6 buses per hour	6 buses per hour	4 buses per hour
140 (24 hr)	Harrow – Northolt – Hayes	8 buses per hour	8 buses per hour	6 buses per hour
195	Wood End – Hayes – Southall – Brentford	5 buses per hour	5 buses per hour	4 buses per hour
278	Ruislip – Hillingdon – Hayes – Heathrow	4 buses per hour	4 buses per hour	3 buses per hour
350	Hayes – West Drayton – Heathrow (T5)	3 buses per hour	3 buses per hour	3 buses per hour
E6	Bulls Bridge – Hayes – Greenford	5 buses per hour	5 buses per hour	4 buses per hour
H98	Hayes – Hounslow West – Hounslow	6 buses per hour	6 buses per hour	4 buses per hour
U4	Hayes – Hillingdon Hospital – Uxbridge	6 buses per hour	6 buses per hour	4 buses per hour
U5	Hayes – West Drayton – Hillingdon Hospital – Uxbridge	5 buses per hour	5 buses per hour	3 buses per hour
X140 (express)	Harrow – Hayes – Heathrow	5 buses per hour	5 buses per hour	4 buses per hour

Source: TfL – Accessed: November 2018

Future Bus Services

- 3.7.6** In addition to the bus services listed above, an extension of the H32 (which currently operates between Southall and Hounslow) from Southall to Hayes and Harlington Station (subject to completion of the Southall Gasworks link road) is proposed. A bus turning head is proposed within the Nestles Factory development which could potentially be utilised by this service resulting in buses operating along Nestles Avenue.

3.8 PTAL

- 3.8.1** The accessibility of the site has been assessed using the TfL Public Transport Accessibility Level (PTAL) methodology. PTALs are a detailed measure of the accessibility of a site to the public transport network, taking into account the combination of walking time and service frequency.

- 3.8.2 The site currently has a PTAL rating of 4, indicating a good level of public transport accessibility. This good PTAL score is a result of the proximity to Hayes & Harlington railway station and local bus stops.
- 3.8.3 As detailed in Section 3.7, introduction of the Elizabeth Line will deliver a marginal increase in rail service frequency as well as the introduction of an additional bus service to the local area.
- 3.8.4 Whilst the PTAL website does not take account of the recent changes to local bus services, the PTAL of the site has been re-calculated for the future scenario by following the PTAL methodology with the additional bus and rail services included. This demonstrates the PTAL of the site increasing to a rating of 5 meaning very good access to the public transport network. The calculation sheet is included at Appendix D.
- 3.8.5 PTAL was a significant aspect of the evidence considered at Appeal for the previous scheme on this site. For the avoidance of any doubt it was confirmed at Appeal that the proposed site offers a PTAL 4 (good) today, rising to PTAL 5 (very good) following introduction of the Elizabeth Line.
- 3.8.6 The Inspectors states at paragraph 23 of the Costs Decision for the previous Appeal that ***'At the start of the Inquiry, the Council's position as set out in the Highways Statement of Common/Uncommon Ground, was that the PTAL rating of the site would remain at level 4 (good) in the future and would not increase to PTAL 5 (very good) on opening of the Elizabeth Line (Cross Rail) even together with the recent introduction of two additional bus services locally. However, its position changed during the Inquiry, when it conceded that the rating would rise to PTAL 5 at around the time that the development might be occupied'***.
- 3.8.7 Thus, LBH has previously accepted the future PTAL of the site is indeed PTAL 5.

3.9 TIM Assessment

- 3.9.1 TfL's WebCAT resource also provides travel time mapping (TIM) which reflects the travel time from the site to other areas in London by public transport during a morning peak hour. Considering this, the site is accessible to a large area of central and southeast London (including Ealing and Paddington) within a 30-45-minute journey. The output is provided at Appendix E.

3.10 Accessible Transport

- 3.10.1 Where car-free and/or car limited development is proposed, it is important to recognise how accessible particular modes of transport available in the surrounding area are to different possible users, i.e. disabled, elderly, pregnant.

Bus Network

- 3.10.2 In general, all London Bus routes are served by low-floor vehicles with at least one dedicated wheelchair space and an access ramp per bus. For an access ramp to deploy, bus stops themselves must be accessible (where the kerb is high enough for the ramp to deploy or the step onto the bus be at a suitable height for users). All London buses also make use of the 'iBus' system providing audio and visual updates as to the bus route and stop information for deaf/blind users.
- 3.10.3 As per the review of bus services above, a number of routes are accessible within 500m. Site visits have confirmed that the nearest stops, in each direction, are provided with suitable kerb heights to allow bus boarding ramps to deploy.

Dial-a-Ride

- 3.10.4 Dial-a-Ride is a free door-to-door transport service for people with a permanent or long-term disability or health problem who are unable, or virtually unable, to use public transport.
- 3.10.5 Membership of dial-a-ride is available to anyone who is a recipient of the Higher Rate Mobility Component of Disability Living Allowance, the Standard or Enhanced Mobility Rate of the Personal Independence Payment (PIP) or are Registered blind or partially sighted.
- 3.10.6 The service is offered on a pre-booked basis and can be booked up to two weeks in advance.

Taxicard

- 3.10.7 The Taxicard is a fully funded scheme (via London Councils) and is a method of providing subsidised door-to-door transport for people who have serious mobility impairment and difficulty in using public transport. Taxicard holders make journeys in licensed London taxis and the subsidy, of up to £12.80 per trip, applies directly to each trip made.
- 3.10.8 The taxi must be booked in advance via a specific contractor who will then search for available vehicles, including wheelchair accessible vehicles, to provide the service to the Taxicard holder.

60+ / Freedom Pass

- 3.10.9 A 60+ or Freedom Pass is available to people who live within the boroughs of London and are either over the age of 60 or meet the disability eligibility criteria. If you have a Freedom Pass, you can travel free on most public transport services in London, including London Buses, London Underground, London Overground, London Trams, the Docklands Light Railway and most National Rail services within London (after 09:30).

3.11 Summary

- 3.11.1 The Inspector summarised accessibility of the site at paragraphs 54 to 56 of their Appeal decision which states:

Hayes and Harlington railway station lies within approximately 400 metres of the appeal site and is currently served by some eight trains an hour operating between Paddington to the east and Reading/Didcot Parkway and Heathrow airport to the west. In addition, eight local bus services (with stops at the station) provide connections to a range of destinations including Northolt, Uxbridge and Heathrow. Two further bus services have recently been introduced, contributing an extra ten services an hour in each direction, providing an express route between Harrow and Heathrow and a more local service connecting Hayes with Ickenham and Ruislip.

Whilst the recent additional bus services improve the accessibility index, that is not to the extent that it alters the current PTAL 4 rating. However, once the Elizabeth Line (Crossrail) opens - currently anticipated mid-2022 - a further two rail services an hour will stop at the station, providing connections to Reading, Maidenhead and Slough in the west, and as far as Romford and Shenfield in the east. The new line will also provide direct connections from Hayes to central London, Canary Wharf and Stratford, as well as to key transport interchanges in the future such as Old Oak Common, which would interchange with High Speed 2 and provide onward connections to Euston, Birmingham and other locations further north.

The evidence of the appellant is that, combined with the recent bus service improvements, the introduction of the Elizabeth Line will increase the rating of this part of the Borough (including the appeal site) to PTAL 5, classed by TfL as 'Very Good'. The accessibility index, which informs the PTAL, is expected to increase further with the planned extension of bus route H32 to Hayes and Harlington, plus further improvements funded by the Nestle factory and Buccleuch developments. In addition, significant station improvements are currently underway, including four new lifts to provide step free access, platform extensions and new canopies, which will also assist in making travel by train more appealing for future residents'.

- 3.11.2 The site is located in a PTAL 4 area, rising to PTAL 5 with introduction of the Elizabeth Line (confirmed at Appeal), with good access to public transport, including rail and a number of local bus services (with the closest bus stop under 400m from the site).

- 3.11.3 In addition, there is very good accessibility to local facilities and services, with the vast majority of key destinations within a distance most people will walk to (1,600m) and the remaining still within a realistic distance where some people will walk (3,200m), indicating that future occupiers of the site will have significant opportunities to utilise sustainable travel modes.
- 3.11.4 This is also supported by the Inspector's conclusion in respect of the Appeal which states at paragraph 65:

'In relation to the appeal site, supermarkets, a cash point, Hayes town centre, two medical centres and a dental practice are located within 800 metres walking distance of the site. A post office, a further supermarket, pharmacy, three schools, a library and a sports and leisure centre lie within 1.6 kilometres, with two more schools and a college within 3.2 kilometres. Quite clearly, therefore, the appeal site is in close proximity to a good range of everyday services and facilities that would be readily accessible to future occupiers on foot or by bicycle'.

SECTION 4 DEVELOPMENT PROPOSALS

4.1 Overview

- 4.1.1 The proposed development is a residential scheme comprising 103 residential units over 11 floors.
- 4.1.2 The development comprises:
- 1-bed – 59 units;
 - 2-bed – 32 units; and
 - 3-bed – 12 units.
- 4.1.3 Pedestrian and vehicular access to the site is taken from Nestles Avenue, with a shared surface providing access to the residential car parking and a car-free route to the residential cores.

4.2 Access Strategy

- 4.2.1 Vehicular access to the site will be relocated from its existing location on the sites' eastern boundary to the western boundary. This provides a car-free route to residential cores on the eastern boundary.
- 4.2.2 The vehicular access is 4.2m in width, which is sufficient for two vehicles to pass, albeit the likelihood of two cars meeting on the access road is negligible. The vehicular access will operate as shared surface given the low vehicular movements anticipated. Direct access to the building can be made via the parking area/cycle parking therefore reducing the need for pedestrians to walk along the vehicle access.

4.3 Parking Strategy

Car Parking

- 4.3.1 The previous Planning Appeal for this site confirmed that this site is entirely appropriate and acceptable to support car-free development.
- 4.3.2 However, in response to LBH's pre-application request to provide car parking spaces, the proposed scheme provides 103 residential units together with 14 car parking spaces, of which four car parking spaces are designated for disabled persons. Thus, the scheme offers a parking

ratio of 0.13 car parking spaces per unit overall. However, the ten standard car parking spaces will be allocated one each to the largest three-bedroom five person units, of which there are ten. This allocation has been provided in response to a request by LBH during pre-planning discussions and further justification for this is provided within the accompanying Planning Statement prepared by Daniel Watney LLP.

- 4.3.3 The remaining 93 units (i.e. all those units which are smaller than the largest three-bedroom five person units) offer an overall parking provision equivalent to 0.04 spaces per unit, provided as four car parking spaces for disabled users only and are essentially car-free.
- 4.3.4 Aside from the ten car parking spaces associated with the largest three bedroom five person units, the parking ratio and approach remains the same as that adopted for the previous Appeal scheme i.e. four disabled parking spaces for 93 units vs. three disabled parking spaces for 81 units; both equivalent to 0.04 spaces per unit.
- 4.3.5 The Inspector provided clarity on interpretation of Policy at the Local and Regional level in paragraph 51 of their Appeal Decision (Appendix A) which states ***'Policy DMT 6 of the recently adopted Local Plan Part 2 sets out maximum parking standards for new development'*** and in respect of the previous scheme, which sought to provide 81 units with three blue badge parking spaces for the residential element and one for the commercial element, the Inspector went on to state ***'Inasmuch as the number of spaces would not exceed the maximum standards, there would be no policy conflict. There would be no conflict either, with policy 6.13 of the current London Plan and Table 6.2, which together confirm that all developments in areas of good public transport accessibility in all parts of London (their emphasis) should aim for significantly less than one space per residential unit. There was no dispute in this regard that the appeal site currently has a Public Transport Accessibility Level (PTAL) rating of 4, which is categorised as 'Good' by Transport for London (TfL).'***
- 4.3.6 The Inspector also noted in respect of the previous Appeal scheme comprising 81 units and three parking spaces for disabled persons, at paragraph 52 of the Appeal decision, that ***'Both the GLA, through its Stage 1 comments, and TfL, set out that the car-free nature of the development proposed is strongly welcomed and supported. I am mindful, in this regard, that a Parking Management Zone is currently in operation along Nestle Avenue and some side streets. The controls restrict on-street parking to residential permit holders only between 09.00-17.00 Monday-Friday. That is complemented with parking restrictions in the form of single yellow lines Monday-Saturday 08.00-18.30. The submitted planning***

obligation includes provision to preclude future occupiers from acquiring a parking permit for the Zone'.

- 4.3.7 It is therefore concluded that since the proposed development remains principally car-free, save for the parking associated with the largest three-bedroom five person units which is addressed separately in the accompanying Planning Statement, the proposed parking provision remains in accordance with LBH maximum car parking standards and LBH Policy DMT6. Indeed, if a scheme which offered three blue badge spaces for 81 units (0.04 per unit) was determined by the Inspector to be in accordance with LBH maximum standards (paragraph 51), it follows suit that this scheme providing 0.13 per unit overall and 0.04 per unit for 93 of those units, is also in accordance with the same standards.

Blue Badge Parking Provision

- 4.3.8 The provision of four blue badge spaces is in line with LBH policy which requires at least one space be provided. Whilst the level of provision is below the recommended guidance of one space for each of the wheelchair adaptable units (normally 10% of all units as per Table 6.2 of the London Plan), the provision should be seen in the context of anticipated demand for the blue badge spaces.
- 4.3.9 The likely demand for disabled parking can be assessed with reference to the 2011 Census and the National Travel Survey (NTS)/Transport Survey of Great Britain (TSGB). It is evident from this data that 11,367 Blue Badges are held within Hillingdon (ref: Table TSGB1209b (DIS0108b) dated November 2016), out of a total population of 302,343 (ref: ONS 2017 mid-year estimate). This is equivalent to 3.8% ($11,367/302,343 \times 100$) of the population within Hillingdon holding Blue Badges.
- 4.3.10 Whilst this is a generalisation of the borough, when applying this to the proposed development, it can reasonably be anticipated that occupants of the development would generate a demand for four blue badge holder parking spaces. Accordingly, the provision of four spaces would be sufficient to meet anticipated demand.
- 4.3.11 This subject was also discussed at Inquiry and the Inspector was satisfied with the approach to blue badge parking for the previous scheme and the approach adopted here is no different.

Cycle Parking

- 4.3.12 Cycle parking for 178 cycles is provided in ground level stores to accommodate the residential long-stay demand. A further four short-stay spaces are provided in the public realm. This level of provision is marginally in excess of the emerging London Plan standards and current adopted standards. In accordance with the London Cycling Design Standards, 5% of spaces are provided by Sheffield Stand, spaced 1.8m apart, to allow for the fixing of large/adapted/cargo bicycles.

4.4 Delivery and Servicing Strategy

- 4.4.1 Given the narrow width of the site, it is not possible to accommodate on-site servicing. Furthermore, given the proposed introduction of the Nestles Avenue Sustainable Transport Corridor and its dedicated, segregated cycle lane and wide footways, it is not considered appropriate to have delivery vehicles crossing the high-quality public realm.
- 4.4.2 Accordingly, as per the previous scheme, the development proposes introduction of an inset loading bay directly outside of the site on Nestles Avenue. This arrangement is the same as proposed under the previous scheme and was accepted by LBH in advance of Public Inquiry previously. As such, it must be concluded that it remains acceptable now.
- 4.4.3 Justification for the proposed delivery and servicing strategy was submitted to LBH in respect of the previous scheme which led to LBH's acceptance of the Strategy and their removal of previous Reason for Refusal 7 relating to the previous scheme prior to Public Inquiry. The justification submitted to and accepted by LBH is included for clarity at Appendix F.
- 4.4.4 The bay has been marginally relocated east compared to its previous location to reflect the revised vehicle access in this scheme. However, as with the previous arrangement which was accepted by LBH, introduction of a loading bay provides a betterment to the existing situation in which large vehicles are able to stop directly outside of the site on Nestles Avenue on a single yellow line, thereby blocking one lane of the carriageway. This arrangement is proposed for use from 'Day 1', in advance of the Nestles Avenue Sustainability Corridor coming forward. This arrangement is shown in Drawing ITL14154-SK-009.
- 4.4.5 In the event the Sustainable Transport Corridor comes forward, it remains possible for the loading bay to remain in situ, reflecting exactly the same scenario as proposed under the previous scheme. A potential arrangement is shown in Drawing ITL14154-SK-010 albeit the

detailed design is for development by LBH; this development as with all land parcels fronting Nestles Avenue provide the land and funding only.

SECTION 5 TRIP GENERATION

5.1 Overview

5.1.1 This section sets out the trip generation of the proposed development in order to determine the traffic impact of the scheme on the local highway. The methodology presented follows the same methodology presented in the TA which supported the previous Appeal scheme and which was accepted by LLBH at that time. However, for the purposes of robustness the TRICS sites have been newly selected to reflect the most recent site selection available given that almost 18 months has passed since the previous trips analysis was undertaken.

5.2 Proposed Trip Generation

5.2.1 The TRICS database has been used to extract residential trip rates for privately owned flats. The sites have been filtered based on the parameter detailed below, based on past experience of supporting residential schemes in Hillingdon;

- Residential/C – Flats Privately Owned;
- Sites in Greater London only;
- Sites with a range of 20 to 250 units;
- Weekday surveys only (Monday-Friday);
- Edge of Town Centre and Suburban Area locations; and
- Outer London survey sites only (Inner and Central London excluded).

5.2.2 The full residential TRICS outputs are provided at Appendix G.

Vehicle Trips

5.2.3 On the basis of the above parameters, the derived vehicle trip rate and resultant vehicle trips are shown in Table 5.1 below.

Table 5.1: Residential Vehicle Trip Generation (Vehicles) – 103 Units

	AM Peak Hour (0800 – 0900)			PM Peak Hour (1700 – 1800)			12-Hour (0700 – 1900)		
	In	Out	Two Way	In	Out	Two Way	In	Out	Two Way
Trip Rate (per 100sqm)	0.025	0.061	0.086	0.111	0.118	0.229	0.962	0.992	1.954
Vehicular Flow	3	6	9	11	12	24	99	102	201

Source: TRICS 7.7.1. Note: Numbers may not sum due to rounding.

5.2.4 Table 5.1 demonstrates that the scheme can be reasonably anticipated to result in nine two-way vehicle trips in the AM peak hour and 24 vehicle trips in the PM peak hour.

5.2.5 Some trips will also be made as a car passenger. Therefore, to derive total trips by car, consideration of the car occupant trip rate has been derived. This is shown in Table 5.2 below.

Table 5.2: Residential Total Car Occupant Trip Generation – 103 Units

	AM Peak Hour (0800 – 0900)			PM Peak Hour (1700 – 1800)			12-Hour (0700 – 1900)		
	In	Out	Two Way	In	Out	Two Way	In	Out	Two Way
Trip Rate (per 100sqm)	0.032	0.086	0.118	0.133	0.165	0.298	1.254	1.265	2.519
Vehicle Occupants	3	9	12	14	17	31	129	130	259

Source: TRICS 7.7.1. Note: Numbers may not sum due to rounding.

Active Travel Trips

5.2.6 Trips undertaken by active modes can be determined by the total trip generation of the development less the trips undertaken by private vehicle, as set out in Table 5.2 above. This is summarised in Table 5.3 below.

Table 5.3: Residential Active Travel Trip Generation – 103 Units

	AM Peak Hour (0800 – 0900)			PM Peak Hour (1700 – 1800)			12-Hour (0700 – 1900)		
	In	Out	Two Way	In	Out	Two Way	In	Out	Two Way
Trip Rate (per 100sqm)	0.093	0.491	0.584	0.287	0.251	0.538	2.972	3.045	6.017
Person Trips	10	51	60	30	26	55	306	314	620
Vehicle Occupants (Table 5.2)	3	9	12	14	17	31	129	130	259
Active Travel Trips	7	42	48	16	9	24	177	184	361

Source: TRICS 7.7.1. Note: Numbers may not sum due to rounding.

5.2.7 To understand by what modes these active trips are made in the peak hours, 2011 Census Method of Travel to Work data has been obtained for the resident population of Hillingdon 030 Middle Super Output Area (MSOA). As the vehicle trips have been calculated above car or van drivers and occupants/passengers have been removed from the dataset and the percentage modal split of the remaining modes has been recalculated on a proportional basis to other modes.

5.2.8 As such, the active travel trips shown in Table 5.3 have been applied to the modal split data with the resultant flows summarised in Table 5.4.

Table 5.4: Residential Trip Generation – Active Travel

Mode and Modal Split		Trip Generated					
		AM Peak Hour (0800 – 0900)			PM Peak Hour (1700 – 1800)		
		In	Out	Two-Way	In	Out	Two-Way
Bus, minibus or coach	49%	3	21	24	8	4	12
Train, underground, metro, light rail or tram	35%	2	15	17	6	3	8
On foot	11%	1	5	5	2	1	3
Bicycle	3%	0	1	1	0	0	1
Motorcycle, scooter or moped	1%	0	0	0	0	0	0
Other	1%	0	0	0	0	0	0
Taxi	0%	0	0	0	0	0	0
Total	100%	7	42	48	16	9	24

Source: NOMIS, Method of Travel to Work, 2011 (QS701EW) – Output Area: Hillingdon 030 MSOA (E02000523). Note: Numbers may not sum due to rounding.

- 5.2.9 This shows an anticipated 24 and 12 two-way trips on the local bus network during the AM and PM peak hours, respectively. A further 17 and 8 trips can be anticipated on the rail network, respectively.

Delivery and Servicing

- 5.2.10 Additional vehicular trips will be made to/from the development for the purpose of deliveries and servicing. The development will require deliveries for the commercial units, refuse collection from both the commercial and residential units, and ad-hoc deliveries such as post, home shopping, etc. for the residential units.
- 5.2.11 The TRICS data obtained for the residential trip rate identifies servicing vehicle demand and is summarised in Table 5.5 below.

Table 5.5: Anticipated Number of Daily Servicing / Delivery Vehicles

Proposed Land Use	Factor	Anticipated Number of Delivery and Servicing Trips 12-Hours
Residential (103 Units)	0.12 per unit	12, predominantly LGV or Motorcycle/Scooter

Source: TRICS

5.3 Net Change

5.3.1 As the development currently attracts trips (as shown in Table 3.1), it is important to understand the net change in vehicle trips that will arise as a result of the development proposal. This is therefore summarised in Table 5.6 below.

Table 5.6: Net Change in Vehicle Trips

	AM Peak Hour (0800 – 0900)			PM Peak Hour (1700 – 1800)			12-Hour (0700 – 1900)		
	In	Out	Two Way	In	Out	Two Way	In	Out	Two Way
Extant Trips (Table 3.1)	8	5	13	4	7	11	86	95	181
Proposed Trips (Table 5.1)	3	6	9	11	12	24	99	102	201
Net Change	-5	+1	-4	+7	+5	+13	+13	+7	+20

5.3.2 Table 5.5 shows the proposed residential development would result in a net reduction in vehicle trips in the AM peak and a net increase in vehicle trips in the PM peak compared to the extant use. Across a 12-hour day, the net increase will be equivalent to 20 additional vehicle trips on the highway network compared to the extant use that could resume without the need for planning permission.

5.3.3 It should be noted that these vehicular trips are entirely generated as a result of the standard parking spaces that LBH has requested be incorporated into this scheme and that are allocated to the ten largest three-bedroom five person units. The remaining 93 units remain as car-free and would generate only those trips attributable to the four parking spaces for disabled persons, which would be negligible.

- 5.3.4 Still, the increase in vehicular trip generation is negligible in respect of background traffic levels on the urban roads surrounding the site in Hayes Town Centre and is equivalent to an average of just one additional vehicle on the network every 30 to 40 minutes across a 12 hour period, and just one vehicle every four to five minutes during the evening peak hour. This will not result in any material impact on the local highway network and indeed results in a net betterment in the AM peak hour given less vehicle activity will be associated with the site.
- 5.3.5 With respect to the public transport trips, the anticipated bus and rail trips are all lower than those envisaged under the previous application which is attributable to the fact that the development no longer proposes any commercial floorspace.
- 5.3.6 The previous Appeal scheme was found to generate a total of 23 trips on the bus network in each of the peak hours and 18 additional trips on the rail network in each of the peak hours. Whereas, this scheme is forecast to generate 24 and 12 two-way trips on the local bus network during the AM and PM peak hours, respectively. A further 17 and 8 trips can be anticipated on the rail network during the AM and PM peak hours, respectively.
- 5.3.7 Given more than 50 buses per hour are accessible from the site, this results in less than one additional bus passenger per bus in the peak hours.
- 5.3.8 The impact of the proposed scheme on public transport is considered negligible. Furthermore, comments provided by TfL in May 2019 in respect of the previous scheme which generated a greater number of peak hour trips on the bus network, confirmed in respect of that scheme that no financial contribution towards bus services would be required. Thus, with a lower generation of bus trips, it can be concluded that TfL's position would remain unchanged.

SECTION 6 SUMMARY AND CONCLUSION

- 6.1.1 In summary, this TA has been prepared on behalf of Healey Development Solutions (Hayes) Ltd to accompany a planning application for a residential redevelopment at 9 Nestles Avenue, Hayes, within the London Borough of Hillingdon (LBH).
- 6.1.2 The application is for demolition of the existing building and construction of a residential scheme comprising 103 residential units over 11 floors including provision of 14 car parking spaces, four of which are allocated for disabled users, and ten of which are allocated one each to the ten largest three bedroom five person units. The scheme also includes 178 long stay cycle parking spaces and four short stay spaces.
- 6.1.3 Justification for provision of ten standard parking spaces, allocated one each to the ten largest three-bedroom five person units is included within the accompanying Planning Statement prepared by Daniel Watney LLP. In summary, 93 of the 103 residential units proposed are car-free with provision of four car parking spaces for disabled persons for those 93 units.
- 6.1.4 The site is located in a PTAL 4 area, rising to PTAL 5 with introduction of the Elizabeth Line (confirmed at Appeal), with good access to public transport, including rail and a number of local bus services (with the closest bus stop under 400m from the site).
- 6.1.5 In addition, there is very good accessibility to local facilities and services, with the vast majority of key destinations within a distance most people will walk to (1,600m) and the remaining still within a realistic distance where some people will walk (3,200m), indicating that future occupiers of the site will have significant opportunities to utilise sustainable travel modes.
- 6.1.6 This is also supported by the Inspector's conclusion in respect of the Appeal which states at paragraph 65:

'In relation to the appeal site, supermarkets, a cash point, Hayes town centre, two medical centres and a dental practice are located within 800 metres walking distance of the site. A post office, a further supermarket, pharmacy, three schools, a library and a sports and leisure centre lie within 1.6 kilometres, with two more schools and a college within 3.2 kilometres. Quite clearly, therefore, the appeal site is in close proximity to a good range of everyday services and facilities that would be readily accessible to future occupiers on foot or by bicycle.'

- 6.1.7 LBH state on Page 102 of the LIP 3 that:

'..... those residents without access to a car parking space will be unable to park on-street as there is a residents' Parking Management Scheme along Nestles Avenue. As none of the new residents will be able to join this scheme, this will prevent them from parking on-street. Without anywhere to park within the development, or on the surrounding streets, these residents will be discouraged from owning a car, choosing instead to cycle, walk or travel by public transport instead'.

6.1.8 Thus, it is LBH's Policy position that residents without an off-street car parking space will be unable to park on-street since there is a parking management zone and they will not be able to obtain a permit. LBH accepts that since a resident cannot join the permit scheme they will be **prevented** from parking on-street and, even more so, will be discouraged from even owning a car, instead choosing to take up the ample sustainable alternatives available.

6.1.9 This is further supported by the Inspector in their Appeal decision for this site which is clear that, in respect of the previous scheme for 81 units with three car parking spaces for disabled persons *'the Council's case ... also failed to recognise that its own policies and related guidance clearly anticipate a behaviour change and a move to car free development. In particular, its own LIP3 includes specific objectives promoting sustainable travel to encourage a reduction in car use and supporting new development environments that prioritise sustainable travel. LIP3 also confirms that car-free development facilitates behaviour change for residents from the onset of occupying a dwelling in an area that has limited or no parking'.*

6.1.10 The Inspector also provided clarity on interpretation of Policy at the Local and Regional level in paragraph 51 of their Appeal Decision which states *'Policy DMT 6 of the recently adopted Local Plan Part 2 sets out maximum parking standards for new development'* and in respect of the previous scheme which sought to provide 81 units with three blue badge parking spaces for the residential element and one for the commercial element, the Inspector went on to state *'Inasmuch as the number of spaces would not exceed the maximum standards, there would be no policy conflict. There would be no conflict either, with policy 6.13 of the current London Plan and Table 6.2, which together confirm that all developments in areas of good public transport accessibility in all parts of London (their emphasis) should aim for significantly less than one space per residential unit. There was no dispute in this regard that the appeal site which currently has a Public Transport Accessibility Level (PTAL) rating of 4, which is categorised as 'Good' by Transport for London (TfL)'.* This scheme accords with the Policy of the Adopted London Plan.

- 6.1.11** The Inspector also noted in respect of the previous Appeal scheme comprising 81 units and three parking spaces for disabled person, at paragraph 52 of the Appeal decision, that ***'Both the GLA, through its Stage 1 comments, and TfL, set out that the car-free nature of the development proposed is strongly welcomed and supported. I am mindful, in this regard, that a Parking Management Zone is currently in operation along Nestle Avenue and some side streets. The controls restrict on-street parking to residential permit holders only between 09.00-17.00 Monday-Friday. That is complemented with parking restrictions in the form of single yellow lines Monday-Saturday 08.00-18.30. The submitted planning obligation includes provision to preclude future occupiers from acquiring a parking permit for the Zone'***.
- 6.1.12** Thus, there are a range of measures in place which discourage car use and car ownership generally and as such, car-free development (which 90% of this development is) in this location would not have a detrimental impact on highway safety.
- 6.1.13** With reference to the existing site use, the proposed development will result in a slight increase in the number of vehicular trips made to and from the site. However, this is solely attributable to the presence of the ten parking spaces on site allocated to the ten number three-bedroom five person units that form part of this scheme, for which LBH has requested car parking. Justification for that car parking is set out within the accompanying Planning Statement prepared by Daniel Watney LLP.
- 6.1.14** Since the proposed development remains principally car-free, save for the parking associated with the largest three-bedroom five person units which is addressed separately in the accompanying Planning Statement, the proposed parking provision remains in accordance with LBH maximum car parking standards and LBH Policy DMT6.
- 6.1.15** Indeed, if a scheme which offered three blue badge spaces for 81 units (0.04 per unit) was determined by the Inspector to be in accordance with LBH maximum standards (paragraph 51), it follows suit that this scheme providing 0.13 per unit overall and 0.04 per unit for 93 of those units, is also in accordance with the same standards.
- 6.1.16** Section 5 has set out a detailed assessment of the impact of development trips upon the local public transport network. The impact of the scheme has been shown to be negligible in transport terms and less than the public transport impact associated with the previous Appeal scheme. Thus, it is reasonable to conclude that TfL's conclusion, in respect of that scheme, that no

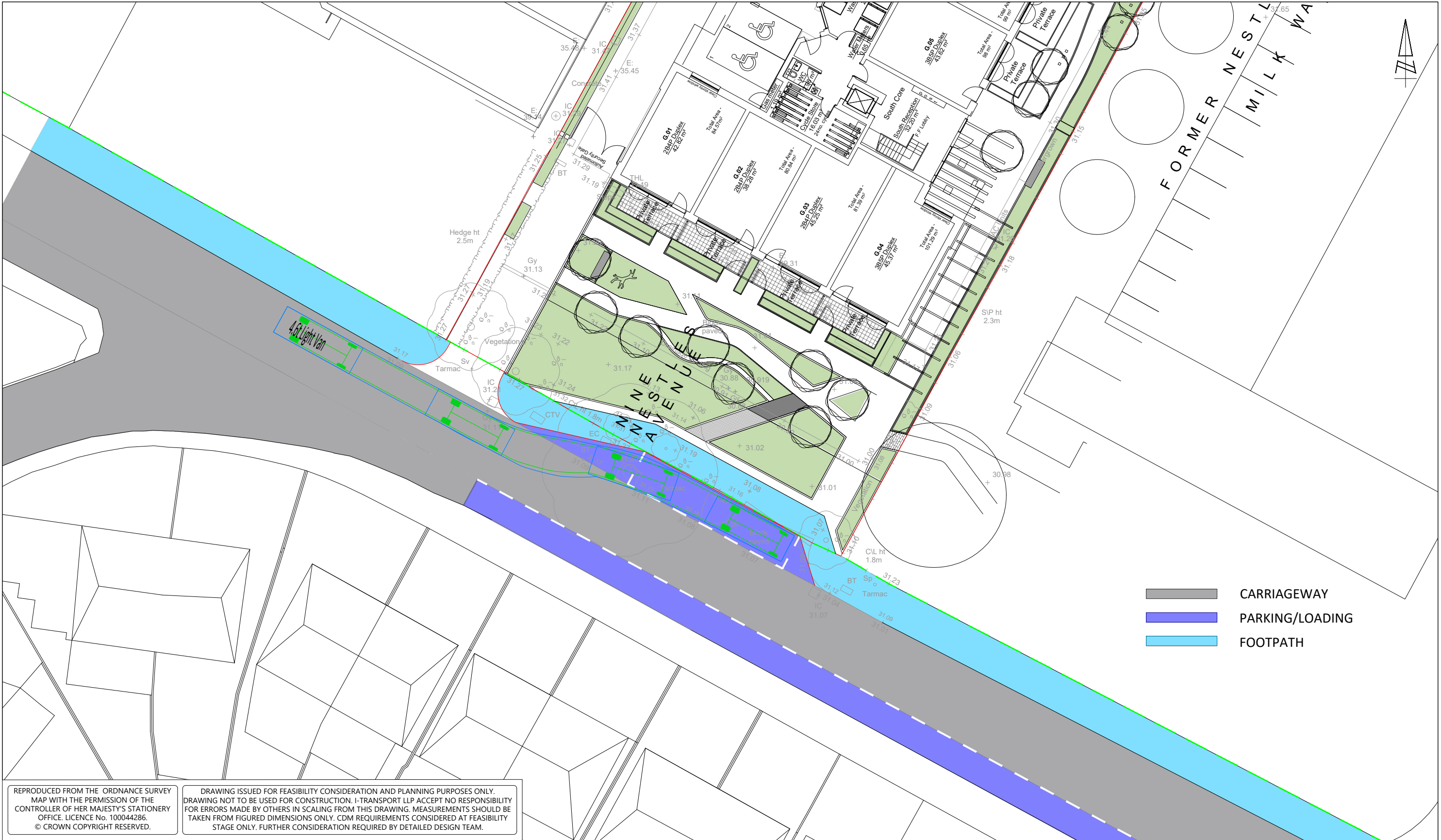
financial contribution towards bus services would be required, remains the case for this scheme which generates fewer additional public transport trips; again attributable to removal of the commercial element of the scheme.

- 6.1.17** The development includes efficient provision for deliveries and servicing, in accordance with national, regional and local policy. The anticipated daily servicing/delivery requirements are low – with a worst-case requirement of approximately 12 light goods vehicles. An outline DSP has been prepared in accordance with regional and local requirements and is submitted as part of the application. The servicing strategy, with provision of the on-street loading bay, is the same as that proposed under the previous Appeal scheme and previously accepted by LBH. Our justification that led to acceptance by LBH is included again at Appendix F. Furthermore, the number of deliveries forecast for this scheme is lower than was forecast for the Appeal scheme, since the commercial element of the scheme has been removed.
- 6.1.18** There will be an increase in walking and cycling trips to and from the site, and an increase demand for public transport services compared to the extant position. However, the existing infrastructure for walking, cycling and public transport trips is suitable to accommodate this increase, and committed improvements will enhance this further, including additional bus and rail services and the proposed introduction of the Nestles Avenue Sustainable Transport Corridor, for which this development makes provision through a set back from Nestles Avenue and a S106 contribution.
- 6.1.19** A Travel Plan and Delivery and Servicing Plan will be introduced with framework versions also submitted alongside this TA.

6.2 Conclusion

- 6.2.1** In conclusion, the proposed development complies with the relevant national and local policies and is considered acceptable in transport terms.
- 6.2.2** It will be for LBH to determine acceptability of the ten car parking spaces proposed for the ten three bedroom five person units in the context of the planning balance, the Inspector's Appeal Decision and Cost Award in respect of the Appeal scheme and the regional policy context of the emerging London Plan, which carries substantial weight in respect of this scheme.

DRAWINGS



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 85 Gresham Street, London, EC2V 7NQ Tel: 0203 705 9215 www.i-transport.co.uk							TITLE: INTERIM ARRANGEMENT ON NESTLES AVENUE		DRAWN: JMc	CHECKED: JN	APPROVED: VP			
	A	30.07.20	JD	SITE LAYOUT UPDATED		JN	VP			SCALE @ A3: 1:250	DATE: 28.05.20			
	REV	DATE	BY	DESCRIPTION		CHK	APD	PROJECT:	CLIENT:	PROJECT No: ITL14154				
	STATUS: FOR INFORMATION							NESTLES AVENUE, HAYES		9 NESTLES AVENUE LIMITED		DRAWING No: ITL14154-SK-009		REV: A



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 85 Gresham Street, London, EC2V 7NQ Tel: 0203 705 9215 www.i-transport.co.uk								TITLE:		DRAWN: JMc		CHECKED: JN		APPROVED: VP	
		A	30.07.20	JD	SITE LAYOUT UPDATED			JN	VP	FINAL ARRANGEMENT ON NESTLES AVENUE		SCALE @ A3: 1:250		DATE: 28.05.20	
		REV	DATE	BY	DESCRIPTION			CHK	APD	PROJECT:		CLIENT:		PROJECT No:	
		STATUS:			FOR INFORMATION					NESTLES AVENUE, HAYES		9 NESTLES AVENUE LIMITED		ITL14154	
												DRAWING No:		REV:	
												ITL14154-SK-010		A	

APPENDIX A. APPEAL DECISION



Appeal Decision

Inquiry opened on 18 February 2020

Site visit carried out on the same day

by Mrs J A Vyse DipTP DipPBM MRTPI

an Inspector appointed by the Secretary of State

Decision date: 26th March 2020

Appeal Ref: APP/R5510/W/19/3230503

Stanford House, 9 Nestles Avenue, Hayes, UB3 4SA

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for planning permission.
 - The appeal is made by Healey Development Solutions (Hayes) Limited, against the Council of the London Borough of Hillingdon.
 - The application 51175/APP/2018/4260, is dated 4 December 2018.
 - The development proposed comprises demolition of existing building and redevelopment to provide a building up to ten storeys, with 868 square metres of commercial or community space (Use Class B1 or D1) at ground and first floor level and 81 (44 x one bed, 28 x 2 bed and 9 x 3 bed) residential units to the upper floors with associated landscaping, access, car parking and cycle parking.
-

Decision

1. For the reasons that follow, the appeal is dismissed and planning permission for demolition of the existing building and redevelopment to provide a building up to ten storeys, with 868 square metres of commercial or community space (Use Class B1 or D1) at ground and first floor level and 81 (44 x one bed, 28 x 2 bed and 9 x 3 bed) residential units to the upper floors with associated landscaping, access, car parking and cycle parking at Stanford House, 9 Nestles Avenue, Hayes, is refused.

Preliminary Matters

2. The appeal was accompanied by a draft planning obligation in the form of a deed of agreement between the parties. It sets out a range of obligations, covenants and undertakings subject to the usual contingencies. The provisions secured are a material consideration in this case. With the agreement of the parties, a completed version of the document was submitted shortly after the close of the Inquiry.¹
3. During the Inquiry, revised plans were submitted in relation to the amenity space provision on the flat roofs within the appeal scheme.² The parties were agreed that determining the appeal on the basis of those plans would not prejudice the interests of any other party, the revisions being confined to minor details within the site. I have no reason to take a different view.

Application for Costs

4. At the Inquiry, an application for an award of costs was made by the appellant against the Council. That application is the subject of a separate Decision.

¹ Inquiry Document 22 (ID22)

² Appended to the Addendum Statement of Common Ground in relation to Amenity Space (ID16)

Main Issues

5. The principle of a residential-led, mixed use scheme for the site is consistent with the Council's vision for Hayes as set out in the Local Plan, and the Council takes no issue with the quantum of replacement employment floorspace proposed. However, following the lodging of the appeal the Council resolved that, had it been in a position to determine the application, permission would have been refused. Eleven putative reasons for refusal were originally cited. In the light of ongoing discussions between the parties, the submission of further information, and subject to appropriate conditions and obligations, many of those reasons were not, in the event, pursued.
6. Given that context, the main issues on which the outcome of this appeal turns relate to:
 - whether the scheme would materially prejudice comprehensive redevelopment of the larger Site B area identified by policy SA 5 of the Local Plan, within which the appeal site lies;
 - the effect on the heritage significance of the adjacent Conservation Area;
 - the effect of the development proposed in terms of its scale, massing, design and townscape/streetscape impact on the character and appearance of the area, including the adjacent Conservation Area; and,
 - the effect of the proposed parking provision on vehicular and pedestrian safety.

Reasons for the Decision

7. The development plan for the area includes the London Plan (March 2016), the Council's Local Plan Part 1 Strategic Policies (November 2012), Local Plan Part 2 Development Management Policies (January 2020) and Local Plan Part 2 Site Allocations and Designations (January 2020).
8. In December 2019 the Mayor submitted his 'Intend to Publish' version of the emerging London Plan to the Secretary of State for consideration. In light of the Mayor's opposition to some of the key recommendations, policies could change. It was a matter of agreement at the Inquiry however, that the policies relevant to the outcome of this appeal could be given substantial weight since they do not go to the heart of the Mayor's concerns and thus are unlikely to change. I have no reason to take a different view.
9. Based on the targets in the current London Plan, the Council can demonstrate almost 22 years supply of housing land, reducing to 6.22 years against the targets in the emerging Plan. I was advised that one of the sites in the supply expected to deliver some 197 dwellings is no longer anticipated as coming forward in the next five years, reducing the supply to 21.33 years and 6.04 years respectively. That said, the Council can still demonstrate the required five year supply, whichever targets it is measured against. It was also confirmed that neither the appeal site, nor the approved housing on the nearby Buccleuch site, is relied on to meet the housing targets.

The Proposal

10. The appeal site is occupied by a late 1930s storey employment building which includes a two storey office element with an Art Deco influenced frontage, plus a largely hard surfaced forecourt. It is proposed to redevelop the site to deliver

a mixed use scheme comprising a single building with commercial floorspace³ mainly at ground floor but with a mezzanine level at first floor, with 81 residential units at first floor level and above, built specifically for rent. In addition to the employment floorspace, the ground floor would accommodate dedicated plant space for both the employment and residential uses, cycle storage and four fully accessible car parking spaces.

11. The building would be set some 15 metres back from the existing highway boundary on Nestles Avenue, as is the existing premises. That set back includes a protected 6 metre deep strip across the site frontage adjacent to the highway, to assist in delivery of a Multi Modal Transport Spine (a sustainable transport corridor containing a footway, cycleway and widened road to accommodate a proposed bus route along Nestles Avenue). Between that and the front of the proposed building would be an area of landscaping, similar to that approved in relation to the adjacent Nestlé Factory and nearby Buccleuch sites. Bay windows to the commercial floorspace would project into this space.

Comprehensive Development

12. The appeal site is located within the broad Heathrow Opportunity Area as set out in the current London Plan. That is to be amended through the emerging London Plan with the creation of a distinct Hayes Opportunity Area. The appeal site also forms part of a larger site allocated for development by policy SA 5 of the recently adopted Local Plan Part 2.
13. The SA 5 allocation forms the most significant growth point within the Hayes Housing Zone, comprising an important strategic site referred to at the Inquiry by the Council as a 'jewel in the crown' of its Local Plan. The allocation is divided into three sites: Site A, extending to some 12 hectares, comprises the former Nestlé Factory and its environs, the boundary to which corresponds with the Conservation Area; Site B (1.76 hectares) includes Nos 7 and 9 Nestles Avenue (No 9, which extends to some 0.23 hectares, being the appeal site) the Squirrels Trading Estate and Nos 3 and 4 Viveash Close; Site C (2.2 hectares) comprises the land on the western side of Viveash Close, extending up to Station Road. Viveash Close runs along the boundary between Sites B and C.
14. As confirmed in the introduction to policy SA 5, the Council is keen to ensure that complementary design principles are adopted and that the resulting infrastructure requirements associated with the planned levels of growth are fully integrated. It also emphasises that proposals from individual landowners should, *as far as possible*, come forward in a co-ordinated manner without prejudicing the development aspirations on other parts of the site (my emphasis). In addition, part C of Local Plan policy DMHB 11 requires that the design of new development safeguards the satisfactory redevelopment of any adjoining sites that have development potential. However, although the appellant has made continuous attempts to engage adjoining landowners within Site B in working collaboratively on a more comprehensive scheme, this has so far been unsuccessful.
15. Whilst policy SA 5 sets out a clear preference for Sites A, B and C to form a comprehensive development scheme across the whole of the allocation, the Council has allowed Site A and part of Site C (Nos 233-236 Nestles Avenue, known as the Buccleuch site) to come forward separately. Both the consented

³ Proposed for either commercial or community use.

schemes relate to materially larger sites than the appeal site - the approval for the Factory site covers the whole of Site A, whilst the Buccleuch scheme covers around two thirds of Site C.⁴ Nevertheless, in approving those developments, the Council was clearly satisfied that they would not materially prejudice future redevelopment of adjacent land within the SA 5 allocation. On the same basis, in coming forward as a proposal for only a small part of Site B, the appeal scheme needs to ensure that it would not materially prejudice redevelopment of the remainder of the Site.

16. There is currently no adopted masterplan for the allocation site as a whole. Whilst the GLA started to draw up a draft Planning Framework for the area in 2017 it was never consulted on, endorsed, or adopted by the Council. It did though, confirm the principle of a wide east/west linear park across the three constituent Sites to provide a high quality green pedestrian link connecting through to the railway station and Station Road to the west. That link was incorporated as an integral feature of the individual masterplans for each of the approved schemes, to either side of Site B.
17. The application the subject of this appeal was accompanied by a masterplan for Site B, drawn up by the appellant. Whilst none of the other Site B landowners have bought into or are signed up to that plan, it nevertheless gives a broad brush perspective as to how Site B might come forward, including provision for the linear park.
18. Whilst the proposed building would be set back from the Nestles Avenue road frontage it would, in seeking to maximise development on the plot, be set close to the other boundaries, in particular to the northern and western site boundaries. Were the appeal to succeed, redevelopment of the remainder of Site B would have to be brought forward having regard to the built context. That context would include the consented schemes not only on Sites A and C, but also the appeal site.
19. Looking firstly then at the relationship between the proposal and the Squirrels Trading Estate to the north of the appeal site. The likely route of the east/west linear park referred to above would run through that part of Site B. Whilst delivery of the park may well constrain the developable area of the Trading Estate, no substantiated evidence was before me to demonstrate that, by itself, the Trading Estate is currently a viable development site that would somehow become unviable as a consequence of the development now proposed.
20. Although the Council made detailed criticisms of the various sketch schemes drafted by the appellant for potential development on the Trading Estate (many of which concerns I share) that is not the same as demonstrating convincingly that, allowing for provision of the green link, the remainder of the Squirrels site could not be maximised to allow for a policy compliant redevelopment scheme to come forward as a consequence of the appeal scheme. On the contrary, in including a windowless façade to its northern elevation the appeal scheme has, in my view, specifically facilitated the possibility of a 10 storey building on the adjacent site, between the appeal building and the southern extent of the obvious line of the linear park.

⁴ Site A: 1331/APP/2017/1883 Part demolition of existing factory buildings etc and redevelopment to provide 1,386 dwellings, office, retail, community and leisure uses, 22,663 sqm commercial floorspace etc Approved 23 May 2017 (ID6) Site B: 1699/APP/2017/2201 Redevelopment including 457 residential units, 264 sqm A1 retail, 229 sqm A3 café use and 2,273 sqm B1 office space etc Approved 19 December 2019.

21. I fully appreciate that any future development would need to extend slightly onto land in the ownership of the appellant in order to avoid leaving a 3 metre gap between the two buildings⁵ (which would be unacceptable in urban design terms). However, that would be a matter for negotiation between the parties in the first instance and does not mean that the appeal scheme of itself causes material prejudice.
22. In support of its case, the Council drew my attention to an appeal decision relating to a development scheme on the site of No 3 Viveash Close at the northern end of Site B.⁶ Among other things, the Inspector found that, taken in isolation, the scheme failed *'to make an adequate contribution to the provision of open areas to reflect the aims of policy SA 5, meaning that others may have to make a disproportionate contribution if redevelopment was to go ahead on neighbouring sites.'*
23. I fully appreciate that delivery of the east/west link is integral to the success of the redevelopment of the allocation site as a whole. I am also mindful, in this regard, of the GLA Stage 1 Report which states that *'in general, comprehensive development is essential to ensure that the challenges and incentives of brownfield land development are shared evenly in order to achieve coherent growth and regeneration – whilst integrating delivery of the infrastructure necessary to support sustainable communities.'* The report goes on to set out *'...that allowing the site to come forward in isolation could undermine delivery of the wider policy and design objectives that may require cross-subsidy as part of a larger (and more viable) scheme.'* However, as noted by the appellant, whether the remainder of Site B is brought forward for development by the respective owners, by the Council exercising its compulsory purchase powers, or even a combination of both, there is no policy requirement for cross-subsidies on any part of Site B and it was no part of the Council's case that individual site owners should or could be required to hand some of their profits to a neighbouring landowner to facilitate development of their site. All in all therefore, whilst I understand the concerns raised, I find no material prejudice to the prospects for re-development of the adjacent Squirrels site as a consequence of the appeal scheme coming forward in isolation.
24. No 7 Nestles Avenue adjoins the western boundary of the appeal site. It was no part of the Council's case that that site could not be built out as shown on the appellant's masterplan which shows an 18 metre wide double-sided corridor block of residential accommodation, such blocks being the basis for the approved schemes on Sites A and C. The appeal building comes close to the shared boundary with No 7, relying heavily on the adjacent site to provide the majority of the necessary separation between windows to habitable rooms.
25. The Council was concerned that the proposed relationship would constrain unduly redevelopment of No 7 Nestles Avenue. However, given the need to set back any development on the adjacent site by at least 7 metres from the boundary with Viveash Close (in order to accommodate the required separation from the approved scheme on Site C) the evidence of the appellant, which was not undermined by the Council, was that pulling the appeal scheme away from

⁵ The red line boundary for the appeal site sits roughly 3 metres further north of the rear of the existing building, extending halfway across an access road that runs along the southern boundary of the adjacent Trading Estate.

⁶ APP/R5510/W/18/3218824 Mixed use redevelopment scheme providing 68 residential units and 1617 sqm commercial floorspace etc. Dismissed 19 July 2019.

the shared boundary would not give the adjacent site any obvious advantage in terms of the amount of development that could be brought forward there. For instance, even were the required minimum 21 metres separation between facing windows to habitable rooms shared equally between the two sites,⁷ it would not be possible to widen significantly the development block on the No 7 site and achieve acceptable room layouts in terms of room depths and daylight levels. I am content, therefore, that the appeal scheme would not materially prejudice the prospects for redevelopment of No 7 Nestles Avenue.

26. With regard to the remainder of Site B, namely Nos 3 and 4 Viveash Close, they are separated from the appeal site by the Squirrels Trading Estate. No substantiated evidence was before me to demonstrate that allowing the appeal would make any difference to the prospect of No 3 or No 4 coming forward, either separately or together.
27. Returning to the Viveash Close appeal decision, the development in that case was to be built up against the southern boundary of that site, with the Inspector concluding that *'this could dictate and prejudice the form and nature of the development of the larger site, without any overall comprehensive consideration being available.'* Whilst there is no information as to the detailed arguments presented in that case, I agree with the appellant that the Inspector's test of 'could', is not the same thing as 'would', or even 'would be likely to'. There is no indication either, that the Inspector had before him any details as to how development might come forward on No 4 Viveash Close with the proposed scheme in place. Whilst he does refer to the 2017 GLA Framework Plan, there is no mention of any masterplan for Site B. In contrast, I do have a masterplan showing possible schemes of redevelopment for the whole of Site B, including those parts adjacent to the current appeal site. Moreover, that earlier appeal was determined in the summer of 2019. Since then, development on Site A has proceeded apace, with Block D adjacent to the current appeal site nearing completion, and with permission having been granted in December 2019 for the Buccleuch development on Site C. A quite different context from that of No 3 Viveash Close. These are material differences which distinguish the two cases.
28. To conclude on this issue then, I find nothing in the evidence before me to demonstrate that the development proposed would make any material difference in terms of the prospects for development of either the Squirrels Trading Estate or the site of No 7 Nestles Avenue coming forward in the future, either in isolation, taken together, or as part of a wider scheme for the remainder of Site B. On that basis, I consider that there would be no material prejudice to comprehensive redevelopment of site B as a whole. There would be no conflict, in this regard with policy 2.13B of the London Plan, policies DMHB 11 and SA 5 of part 2 of the Local Plan, and policies D3, D8, GG1 and GG2 of the emerging London Plan, which together and among other things seek to provide access to good quality community spaces, and make the best use of land including maximising the contribution of public realm whilst safeguarding satisfactory redevelopment of any adjoining sites with development potential.

Heritage Significance

29. The appeal site lies outwith but adjacent to the Botwell: Nestlé Conservation

⁷ Similar to the arrangement agreed between the developer of the approved Buccleuch scheme and the owner of the remainder of Site C.

Area. Whilst the setting of Conservation Areas are not afforded any statutory protection, paragraphs 189 and 190 of the National Planning Policy Framework (the Framework) require an assessment of the particular significance of any heritage asset that may be affected by a proposal, including by development affecting its setting. Although significance can be harmed or lost through development within the setting of heritage assets such as Conservation Areas, the setting of itself is neither a heritage asset nor a heritage designation. Rather, its importance lies in what that setting contributes to the significance of the heritage asset, or to the ability to appreciate that significance.

30. There is no formal Appraisal for the Conservation Area, which is currently on the 'At Risk' register due to its deteriorating condition since Nestlé vacated the site in 2014. Instead, my attention was drawn to the Heritage Statement submitted in connection with the planning application for development of the Nestlé Factory site.⁸
31. This is a relatively modest Conservation Area, the boundary of which corresponds generally with that of the former Nestlé Factory site. It is focused on the visible elements of the original buildings and their garden setting (key survivals which illustrate the early history of cocoa manufacture and factory use) and on the functional relationship of those buildings with the Grand Union Canal and the railway, the proximity to which informed the initial location of the factory. Three of the buildings are locally listed. The heritage significance of the Conservation Area (as opposed to its character and appearance) derives largely from its special historic and architectural interest.
32. In terms of setting, the Council's Conservation Area Review Report (October 1999) confirms that the front of the factory is important in landscape terms, that the main views are from the canal tow path and along Nestles Avenue, with a particular axial view by the ornamental gates, and that the by-pass to the east gives an unexpected elevated view of the complex. The Heritage Statement referred to above confirms that the key view of the site, from which its heritage significance can readily be appreciated, is from Nestles Avenue towards the principal foyer element of the factory building, enhanced by the metal boundary railings and gates.
33. To the west, whilst the land originally formed part of the open grounds associated with the factory, it was sold off and has long since been developed for industrial purposes, comprising a mix of largely utilitarian industrial sheds and buildings, including the appeal site. Whilst those buildings are part and parcel of the industrial character of this part of Hayes they do not, in my view, make any contribution to the heritage significance of the Conservation Area. In particular, the appeal site is not seen as an integral part of any of the views referred to above and it does not contribute in any material way to the ability to appreciate the significance of the Conservation Area, especially given the presence of the recent substantial buildings on the Factory site, between the historic core of the Conservation Area and the appeal site.
34. I mentioned earlier the presence of locally listed buildings within the Conservation Area. These non-designated heritage assets comprise the 1930s Nestlé Factory works, the former canteen, and the gates and railings along part of the site frontage. Their significance, which largely informs the significance of the Conservation Area itself, derives from their architectural and historic

⁸ Relied on by the parties in the absence of a formal Conservation Area Appraisal.

interest which is enhanced by their group value. Their historic setting, which is generally confined to the Conservation Area itself but also includes the key view referred to above from Nestles Avenue, is an integral part of that significance. For the reasons set out above, the appeal site makes no contribution to that significance, or to any appreciation thereof.

35. In light of the forgoing, whilst the development proposed would clearly result in a change to the setting of the Conservation Area, there would be no harm in terms of its heritage significance, or the heritage significance of the non-designated assets within it. It follows that there would be no conflict with Section 16 of the Framework, or with policy 7.8 of the London Plan, policy HE1 of the Local Plan Part 1, and policies DMHB 1, DMHB 3, DMHB 4, DMHB 11 and SA 5 of Part 2 of the Local Plan, which together and among other things seek to sustain and enhance the significance and integrity of heritage assets.

Character and Appearance/Urban Design

36. The building proposed would be of ten storeys at its highest, at the northern boundary of the site adjacent to the Squirrels Trading Estate, stepping down at intervals through eight, five and four storeys to the southern (road) frontage, providing for reduced massing facing the lower two-storey dwellings on the opposite side of Nestles Avenue. The design employs a generally pleasing industrial/warehouse aesthetic and has similarities in terms of form and massing with the adjacent building on the Nestlé Factory site (Block D) which is nearing completion. However, as noted earlier, the building footprint occupies much of the site coming, for instance, to the edge of the adjacent Trading Estate to the north, and to within roughly 2 metres of the shared boundary with No 7 Nestles Avenue to the west.
37. Block D, adjacent to the appeal site on the Nestlé Factory site extends all the way up to the southern boundary of the linear park, onto which it has a frontage. The appeal site, however, does not extend that far north. It is separated from the southern boundary of the likely route of the park through Site B (the general alignment of which is informed by the corresponding provision on the approved schemes on Sites A and C) by the southern part of the Squirrels Trading Estate. Of particular concern to the Council in this regard, is the ten storey façade on the northern elevation of the proposed building which would have no windows or openings, intended to facilitate potential future development on the adjacent Trading Estate.
38. A similar issue arose in relation to the 3 Viveash Close appeal. In that case, the development was to be constructed adjacent to the site boundary with No 4 Viveash Close, to the south, with blank elevations intended to facilitate adjacent development being built up to that boundary. The Inspector in that case found that if redevelopment of the neighbouring land within Site B did not come forward, the appeal scheme would appear harsh and dominant in the context of the existing buildings. He concluded that whilst the proposal in that case would, in longer views, be seen against the backdrop of taller buildings to the north of the railway, and those under construction in the vicinity, the contrast at closer quarters would be stark and unacceptable in the context of the much smaller adjacent buildings.
39. There are material differences between the current appeal and the Viveash Close scheme, not least in terms of design and detailing. The Viveash Close development comprised two tower blocks (of eight and ten storeys) connected

by a podium at ground floor level. The blank southern elevations of the towers were of a panelised cladding system to a modernist design with a significant horizontal emphasis. Notwithstanding the absence of any windows, the exposed northern elevation of the building the subject of the current appeal comprises a highly articulated contextual brickwork façade, referencing art deco style characteristics of both the former Nestlé Factory and the frontages to the units facing onto Nestles Avenue, including No 9.

40. Moreover, the building would not be viewed only in elevation. Rather, in views from the north/northwest, a particular concern of the Council, the façade would be seen in conjunction with the well-considered western elevation of the building. Furthermore, whilst it would be close to the lower buildings on the adjacent Squirrels Trading Estate, when seen in views from Viveash Close, from the station car park and the station itself, and from High Point Village beyond it would have a very close relationship with the northern end of Block D on the adjacent Factory site, which is currently nearing completion and is sited adjacent to the eastern end of the Trading Estate. The western elevation of that end of Block D comprises a four storey energy centre, rising to ten storeys of residential accommodation behind. That is a quite different context from that of the Viveash Close scheme. On balance, I am content in the circumstances that prevail here, that the north elevation of the appeal building would not, given its emerging context and design, be seen as an unduly intrusive or incongruous feature pending any redevelopment of the adjacent Trading Estate, and there would be no harm in terms of any unacceptable impact on the character and appearance of the area in this regard.
41. However, good design includes visible, clearly identifiable entrances that are directly accessible from the public realm, a key aspect of a development's contribution to the legibility of the urban environment. Indeed, as confirmed in the National Design Guide, successful streets are characterised by buildings facing the street to provide interest, with overlooking and active frontages at ground level, an active frontage being defined as the front of a building with openings onto the space that generate activity and engagement between the building interior and the space outside, particularly entrances.
42. Both the approved Nestlé Factory scheme and the Buccleuch development have entrances on the front of the buildings, providing an active frontage directly onto Nestles Avenue. The appeal scheme however, has no direct entrances on that principal road frontage. Rather, all access to the building would be taken from a secondary, side elevation facing onto a north/south shared space access lane, comprising a long cul-de-sac with gates at the far end.
43. I share the concerns of the Council in this regard, about the legibility of the building, particularly in terms of access. The entrances would be largely hidden from view and would not be readily identifiable from the street. Moreover, no windows as such are shown facing onto the access lane at ground floor level. Rather, there would be the entrance to the commercial unit, together with the entrances to the cycle storage and undercroft car parking spaces, the refuse and recycling stores, a substation, and the two residential entrance lobbies. Moreover, at its southern end, the access would pass beneath the overhanging second and third floors of the four storey element for a distance of roughly 11 metres. At its northern end, the upper storeys would project roughly halfway across the lane for a distance of around 10 metres. In addition, balconies on all floors would overhang the access lane along its length.

44. Whilst the appellant referred to the access lane as a linear landscaped area, the extent of the building footprint leaves only a relatively narrow band for planting between the access and the site boundary. Furthermore, any planting would be fragmented, with the strip including cycle stands and areas of grasscrete to allow for vehicles to manoeuvre into and out of the parking spaces proposed. As a consequence, instead of an active and attractive street scene, it seems to me, particularly when combined with the tunnelled lengths at each end and the oversailing balconies, that the access lane would have the appearance of little more than an extended service yard for the most part and would not be a beautiful, people-friendly or welcoming environment for those using the building. That effect would be exacerbated by its proximity to the secure parking area (Milk Yard) on the adjacent Factory site and the related boundary treatments that will be necessary to make that facility secure in due course.
45. I referred earlier to the building footprint occupying much of the current appeal site. Whilst the building would be set back from Nestles Avenue, the four storey element at the front would, including the oversail of the side access lane, extend across almost the whole of the site frontage, right up to the boundary with the adjacent Factory site to the east, and to within a couple of metres of the shared boundary with No 7 to the west. In addition, the whole of the ground floor along the western elevation of the proposed building would be set a couple of metres off the shared boundary with No 7, separated from the adjacent site by only an access path, with the rear of the building set hard up against the access road within the adjacent Squirrels Trading Estate.
46. As noted by the Viveash Close Inspector, whilst buildings of up to 12 storeys are proposed on Sites A and C, they are set within larger sites that contain landscaping and areas of public realm. In contrast, other than the landscaping proposed across the Nestles Avenue frontage, the current appeal scheme does not provide any meaningful setting within the site for the substantial building proposed, with no 'breathing' space around the perimeter of the development. Rather, it is largely reliant on future development taking place on adjoining land to the west (No 7 Nestles Avenue) being set back from the boundary to provide some form of setting.
47. In coming forward ahead of any wider development scheme for Site B to which adjoining owners have had input or are signed up, it is important that the appeal proposal is self-sustaining. It may be that, in due course, a scheme will materialise on the adjacent site to the west which could provide an appropriate setting for the appeal building. However, unlike the Buccleuch scheme, such provision is not secured by the planning obligation, or any other mechanism, and thus cannot be assured as coming forward within any reasonable timeframe, if at all. In the absence of such, the scheme stands or falls on its own merits.
48. The development proposed would generally reflect the form and massing of the adjacent Block D, within the Conservation Area, and I take no issue with the relationship between the two buildings in terms of any harm to the character and appearance of the Conservation Area itself. I take no issue either with the windowless northern elevation of the block in relation to its design, given its context. However, when considered on its own individual merits, I am firmly of the view that the development as a whole would fail to create a positive sense of place, or an environment of high quality, at jarring odds with the successful emerging character of the wider allocation site. Accordingly, in terms of its

overall scale, massing and design it would have a significant adverse impact on the local townscape/ streetscape and on the character and appearance of the area generally.

49. In light of my conclusions on this issue, there would be conflict with policies 3.4, 3.5, 7.4, 7.5 and 7.6 of the London Plan, policy BE1 of the Local Plan part 1, policies DMHB 11, DMHB 12 and SA 5 of the Local Plan part 2, and policies D3 and D8 of the emerging London Plan. Together and among other things, whilst seeking to optimise site capacity, the policies also seek to create buildings, spaces and places that are attractive and well-integrated into their surroundings, that enhance the quality of local places and are sensitive to the character of the area. There would be conflict too with the National Design Guide and paragraphs 127 and 130 of the Framework, which have similar aims.

Parking

50. Policy DMT 6 of the recently adopted Local Plan Part 2 sets out maximum parking standards for new development. Based on that, the maximum provision for the appeal scheme would 122 residential parking spaces plus nine spaces for the commercial element (based on B1 office use). As proposed, however, the development would effectively be car-free, with a total of just four on-site parking spaces: three for residential occupiers and one for the commercial/community floorspace.
51. Inasmuch as the number of spaces would not exceed the maximum standards, there would be no policy conflict. There would be no conflict either, with policy 6.13 of the current London Plan and Table 6.2, which together confirm that all developments in areas of good public transport accessibility in *all parts of London* (my emphasis) should aim for significantly less than one space per residential unit. There was no dispute in this regard that the appeal site currently has a Public Transport Accessibility Level (PTAL) rating of 4, which is categorised as 'Good' by Transport for London (TfL).
52. Both the GLA, through its Stage 1 comments, and TfL, set out that the car free nature of the development proposed is strongly welcomed and supported. I am mindful, in this regard, that a Parking Management Zone is currently in operation along Nestle Avenue and some side streets. The controls restrict on-street parking to residential permit holders only between 09.00-17.00 Monday-Friday. That is complemented with parking restrictions in the form of single yellow lines Monday-Saturday 08.00-18.30. The submitted planning obligation includes provision to preclude future occupiers from acquiring a parking permit for the Zone.
53. However, the Council maintained that current drive to work patterns and historically high car ownership levels in the Botwell ward⁹ would continue in the future, such that a significant number of future residents¹⁰ would be likely to own a private car for use on a daily basis, notwithstanding the absence of any meaningful on-site parking provision and the restriction on obtaining a residential parking permit. It was suggested that in seeking to park wherever the opportunity might arise, those who were unsuccessful in finding an on-street parking space close to the development would be likely to park in locations that would present a risk to road safety, also detracting from local

⁹ The appeal site lies within the Botwell ward

¹⁰ Estimated as 40-60 residents in the oral evidence of Dr Tilly in the related discussion at the Inquiry

amenity.¹¹ On that basis, it was held that a 'car-lite' approach was appropriate here, such as had been approved on the Nestlé Factory and Buccleuch sites, where on-site parking was agreed at a ratio of 0.6 spaces per residential unit. Whilst the later (July 2019) Viveash Close appeal was unsuccessful, the parking ratio proposed there was 0.5 spaces per dwelling, with the Inspector concluding that such provision was acceptable in this location (the appeal failed for other reasons).

54. Hayes and Harlington railway station lies within approximately 400 metres of the appeal site and is currently served by some eight trains an hour operating between Paddington to the east and Reading/Didcot Parkway and Heathrow airport to the west. In addition, eight local bus services (with stops at the station) provide connections to a range of destinations including Northolt, Uxbridge and Heathrow. Two further bus services have recently been introduced, contributing an extra ten services an hour in each direction, providing an express route between Harrow and Heathrow and a more local service connecting Hayes with Ickenham and Ruislip.
55. Whilst the recent additional bus services improve the accessibility index, that is not to the extent that it alters the current PTAL 4 rating. However, once the Elizabeth Line (Crossrail) opens - currently anticipated mid-2022 - a further two rail services an hour will stop at the station, providing connections to Reading, Maidenhead and Slough in the west, and as far as Romford and Shenfield in the east. The new line will also provide direct connections from Hayes to central London, Canary Wharf and Stratford, as well as to key transport interchanges in the future such as Old Oak Common, which would interchange with High Speed 2 and provide onward connections to Euston, Birmingham and other locations further north.
56. The evidence of the appellant is that, combined with the recent bus service improvements, the introduction of the Elizabeth Line will increase the rating of this part of the Borough (including the appeal site) to PTAL 5, classed by TfL as 'Very Good'. The accessibility index, which informs the PTAL, is expected to increase further with the planned extension of bus route H32 to Hayes and Harlington, plus further improvements funded by the Nestle factory and Buccleuch developments. In addition, significant station improvements are currently underway, including four new lifts to provide step free access, platform extensions and new canopies, which will also assist in making travel by train more appealing for future residents.
57. Part A of policy T6 of the emerging London Plan states that parking should be restricted in line with levels not only of existing, but also future public transport accessibility and connectivity. In addition, part B confirms that car-free development should be the starting point for all development proposals in places that are, or are planned to be, well-connected by public transport, with developments elsewhere to be car-lite. Policy T6.1 sets out that new residential development should not exceed the maximum standards set out in corresponding Table 10.3.
58. The Council argued that neither the current PTAL 4, nor the future PTAL 5 rating fully reflect a true picture of the transport situation in this part of

¹¹ Although the related RfR includes reference to concerns about the effect of this on the free flow of traffic, it was confirmed by Dr Tilly in the related discussion, and by Mr Volley in cross-examination, that the Council was no longer pursuing this point.

Hillingdon, an outer London Borough with a number of residents working beyond the Greater London area which in its view is not so well connected. My attention was drawn in this regard, to the Mayor's Transport Strategy (March 2018) which comments that trips in outer London tend to be longer, with many people having no choice but to drive, particularly for trips around outer London (as opposed to into the city centre). It sets out that whilst walking is the first choice for short trips, with buses being important for access to town centres, the car is used for most other travel, although cycling has huge untapped potential to replace many of the shorter car trips.

59. To my mind however, those comments represent a general, rather than specific picture. The widely used PTALs are a detailed and accurate measure of the accessibility of a point to the public transport network, taking into account the walk time from the point of interest to public transport access points, the reliability of the service modes available, the number of services available within the catchment, and the level of service at the public transport access points (average waiting time). Whilst the ratings do not take account of punctuality or quality, they are clearly a good indicator of the level of services available. Moreover, Table 10.3 of the emerging Plan specifically recognises that there are differences between inner and outer London Boroughs with the same PTAL ratings, indicating higher maximum parking provisions for outer London Boroughs. Significantly though, for **all** areas with a PTAL rating of 5-6, the Table is clear that development is to be car free.
60. The Council also maintained that future occupiers would be likely to want to travel to key destinations beyond Greater London, such as Reading, Slough, Staines, High Wycombe, St Albans for employment, with few transport options in Hayes serving those destinations. However, as noted above, Reading and Slough will be served by the new Elizabeth Line once it opens. In any event, based on the 2011 Census database, it would seem that by far the majority of existing residents (85.4%) who live in the same area as the appeal site, are employed within a London Borough (ie not outside Greater London). Almost half of those residents (some 41%) were employed within Hillingdon, with around 30% employed within the Middle Super Output Area which includes Heathrow airport, a key employment location for residents of the area, a location connected directly by bus and rail with those connections set to improve in the future. The next main destination for around 15% of residents travelling to work is Hayes town centre apparently, which is within walking distance of the site (approximately 750-900 metres). The Census database also indicates that the other destinations referred to by the Council are not 'key' destinations as such, with just some 1% of the working population making the journey to Staines, some 0.25-0.3% working in High Wycombe and St Albans.
61. Whilst the Council asserted that travel by public transport was unattractive, referring anecdotally to noisy school children and overcrowding, together with punctuality issues, suggesting there was nothing to influence car ownership in the future, its own policies and related guidance clearly anticipate a behaviour change and a move to car free development. In particular, its Third Local Implementation Plan (March 2019)(LIP3) sets out how the Borough intends to implement the Mayor's Transport Strategy. Among other things, specific objectives promote sustainable travel to encourage a reduction in car use, and to support new development environments that prioritise sustainable travel. It confirms that *'Hillingdon will support car-free and car-lite development in areas*

that are well connected to sustainable travel options ie Uxbridge Station, Hayes and Heathrow.' The appeal site is located in Hayes.

62. LIP3 also confirms that car-free development facilitates behaviour change for residents from the onset of occupying a dwelling in an area that has limited or no parking. I agree with the sentiments of a colleague Inspector drawn to my attention in this regard, endorsed by the Secretary of State, that *'Policy is geared towards persuading people to switch from private cars to public transport in order to try and reduce traffic. One of the best ways of achieving this is to limit parking provisions and one of the best opportunities to persuade people to alter this aspect of their life-styles is when they move home. While not a perfect solution, it follows that providing new residential accommodation with little or no parking at this highly accessible location is likely to help achieve that end...'*¹² I recognise that that relates to a different local authority area, but I see no reason why the sentiments would not hold true here.
63. In addition to precluding access to residential parking permits, the planning obligation¹³ secures the submission of a Travel Plan, which would include a minimum three years free car club membership for future residents. It also secures a contribution towards the Council's planned Multi Modal Transport Spine across the site frontage, which would include high quality footways and cycleways segregated from the carriageway along the northern side of Nestles Avenue connecting to local destinations, which will further encourage the take-up of sustainable modes of travel.
64. Moreover, the officer's report in relation the Buccleuch site confirmed that Nestles Avenue Quietway provides a further opportunity to extend the Brunel University Santander bicycle hire scheme to include Hayes, Stockley Park and West Drayton, which would increase travel choice for future residents. I see no reason why the same consideration is not engaged in relation to the appeal scheme. In addition, the development is planned as a build to rent scheme, with the unchallenged evidence of the appellant demonstrating that tenants of such schemes generally have a lower parking demand than owner-occupied developments.¹⁴
65. A further consideration is the accessibility of the site to local services and facilities. According to the Government publication *Manual for Streets* and the *National Design Guide*, walkable neighbourhoods typically have a range of facilities within a 10 minute walk (up to about 800m) with the 2017 *National Travel Survey: England* (referred to by the appellant) finding that walking is the most frequent mode for short trips, where 81% of trips under one mile (around 1.6 kilometres), and 30% of trips between one and two miles (some 3.2 kilometres) were walks. In relation to the appeal site, supermarkets, a cash point, Hayes town centre, two medical centres and a dental practice are located within 800 metres walking distance of the site. A post office, a further supermarket, pharmacy, three schools, a library and a sports and leisure centre lie within 1.6 kilometres, with two more schools and a college within 3.2 kilometres. Quite clearly, therefore, the appeal site is in close proximity to a good range of everyday services and facilities that would be readily accessible to future occupiers on foot or by bicycle.

¹² APP/I5240/V/17/3174139 LB Croydon Redevelopment scheme including 220 residential units, community and church space and a retail unit. That part of the scheme comprising 106 dwellings was to be car free.

¹³ ID22

¹⁴ Savills' Report 'Unlocking the Benefits and Potential of Build to Rent' on behalf of The British Property Federation (February 2017)

66. The final paragraph of policy SA 5 sets out that, subject to the outcome of area specific studies, an approach to parking which departs from the standards in the Local Plan may be considered if supported by relevant public transport improvements and other mitigating measures. I consider the extensive evidence provided by the appellant to be broadly equivalent to such a study. It demonstrates that the appeal site is in one of the most accessible locations in the Borough, close to Hayes town centre with convenient access to shops, services, facilities, public transport and active travel opportunities. Given that context, and the imminent increase to PTAL 5, I am in no doubt that the absence of on-site parking and the parking restrictions on the adjacent roads would act as a natural deterrent to car-ownership for future occupiers, informing the decision of future occupiers as to whether the scheme would suit their needs/demands.
67. Even in the unlikely event that some future occupiers did own a car, no objective evidence was before me to demonstrate that they would be significant in number, or which supported the Council's contention that parking on the highway in observance of the existing parking restrictions (which include a resident's parking scheme that future occupiers would be ineligible for) would, of itself, have a necessarily adverse impact on vehicular or pedestrian safety or detract from local amenity to any material degree. I recognise that parking enforcement in the area results in numerous parking notices being issued, demonstrating a disregard of those restrictions by some, but that is not evidence that such parking presents an unacceptable risk in terms of vehicular or pedestrian safety.
68. To conclude on this issue therefore, I find no conflict with either existing or emerging policies, with the emerging policies accepted by the Council as attracting substantial weight in this appeal, and other guidance. I find no conflict either with the Framework, which confirms that development should only be prevented or refused on highways grounds if there would, among other things, be an unacceptable impact on highway safety.

Other Matters

69. The development attracts a CIL payment, some £900,000 of which would go towards funding local infrastructure through the Council's Levy, and also to Crossrail through the Mayoral CIL. I am mindful, in this regard that Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority shall have regard to a local finance considerations, so far as material to the application, with Section 70(4) defining a local finance consideration as including sums that a relevant authority will, or could receive in payment of the Community Infrastructure Levy. It was suggested for the appellant that the CIL payment would be a substantial benefit of the scheme in this case, referring me to an appeal determined by the Secretary of State.¹⁵ The Council considered it to be neutral.
70. The Planning Practice Guidance advises that it would not be appropriate to make a decision based on the potential for the development to raise money for a local authority.¹⁶ I am mindful in this regard, that the requirement for the CIL payment is imposed on the developer, with the amount determined by scheme viability. Whilst that contrasts with Section 106 contributions, which are

¹⁵ APP/N5090/W/17/3189843

¹⁶ Paragraph: 011 Reference ID: 21b-011-20140612

focused on addressing specific mitigation measures required by a new development to make it acceptable in planning terms, the payment is nonetheless required to mitigate harm arising as a direct consequence of the development proposed. On that basis, inasmuch as the infrastructure which would be funded in part by the CIL contribution would also benefit the wider population of the Borough to varying degrees, I consider that it carries limited to moderate weight in this instance. I recognise that that differs from the significant weight afforded by the Secretary of State to the CIL payment in the appeal referred to above. However, whilst I have no information as to the specific evidence that led him to that view, I note that the development in that case was for a substantially larger scheme, presumably attracting a materially larger payment.

71. There would be benefits from construction employment, with additional jobs generated in the wider economy outside of construction. In generating additional households, the scheme would also increase gross additional household expenditure. These are not quantified but are matters that generally attract considerable weight. In addition, notwithstanding the existence of a five year supply of housing land, the provision of 81 units for rent on a brownfield site, in a sustainable location, with a good level of public transport accessibility at present, rising to very good in the near future once the Elizabeth Line opens, is a benefit to which I afford substantial weight.
72. One of the putative reasons for refusal related to affordable housing provision. Subsequent negotiations and clarifications led to an agreed position being reached. By the end of the Inquiry, it was a matter of agreement that the scheme could support six affordable homes (equating to 7.4% by habitable room) to be provided as Discount Market Rent units at London Living Rent.¹⁷ The Council confirmed that the provision is the maximum reasonable amount that can be provided by the development at this time. The planning obligation secures that provision, the rents, and early and late stage review triggers, which arrangements mean that there is no conflict with London Plan policies 3.10, 3.11, 3.12 and 3.13, policy H2 of the Local Plan Part 1, or policy DMH 7 of the Local Plan Part 2, which policies together and among other things seek to secure the maximum reasonable amount of affordable housing. However, since the provision is well below the policy target of 35% by habitable room, I afford it only moderate weight.
73. The planning obligation secures some £10,770 towards provision of the Council's planned Multi Modal Transport Spine on Nestles Avenue, with the development scheme also safeguarding land for that purpose. The arrangements secured are required to mitigate the impact of the development proposed given its car free nature. However, inasmuch as there would also be a benefit to the wider community, this is a matter which attracts moderate weight.
74. Provision of the on-site play space and communal amenity space does not attract any positive weight, since it is required for future residents and would not be available for use by others. The shortfall in the quantum of provision is addressed by a financial contribution secured through the planning obligation, towards improvements at nearby Cranford Park. Whilst intended to address a harm arising from the appeal scheme, there would be a shared benefit for the

¹⁷ ID10

wider community in this regard, a benefit to which I afford limited to moderate weight, given the limited scale of the contribution.

75. I recognise that the 848 square metres employment floorspace on the appeal site would, in terms of quality, be an improvement over the existing provision. However, any weight in this regard is tempered by the overall reduction of employment floorspace on the site. That said, I was advised, and no evidence was before me that challenged the evidence of the appellant in this regard, that the re-provided space could facilitate up to 72 jobs, compared to 50 potential jobs for the existing floorspace. Alternatively, it could deliver valuable community floorspace for local residents. All in all, I consider that the commercial floorspace to be provided can be afforded moderate weight.

Overall Planning Balance

76. The Council has a five year supply of housing land and there was no suggestion that any of the most important or otherwise relevant policies are out of date by reason of any conflict with the Framework. As such, the so-called tilted balance set out at paragraph 11 of the Framework is not engaged, with the appeal falling to be determined in accordance with the development plan, unless material considerations indicate otherwise.
77. I have found that the scheme would not materially prejudice comprehensive redevelopment of the larger Site B area, that there would be no harm to the heritage significance or character and appearance of the Conservation Area, and that the proposed parking provision would not harm vehicular or pedestrian safety at the time the development might be occupied. I have, however, found that in terms of its scale, massing, design and townscape/streetscape impact, the development would have a material adverse impact on the character and appearance of the surrounding area generally.
78. The benefits of the proposal as set out above are material considerations. However, as provided for in the development plan and the Framework new development is expected, amongst other things, to create high quality buildings and well-designed places that are sympathetic to and maintain the prevailing character of an area. Having weighed carefully all the above benefits they do not, in my view, outweigh the harm that I have identified. On balance therefore, I conclude that the proposal would conflict with the development plan taken as a whole and thus that the appeal should not succeed. The outcome of that balance would be the same, even had I afforded significant weight to the CIL payments as suggested by the appellant.

Jennifer A Vyse
INSPECTOR

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Stephen Donnelly	Associate Director with Brimelow McSweeney
DipArch, RIBA	Architects

INQUIRY DOCUMENTS

HANDED UP DURING THE INQUIRY

ID1	Appeal Decision APP/X5210/W/15/3141159 (Arthur Stanley House, Camden)
ID2	Appeal Decision APP/F5540/A/06/2024587 (210 Bath Road, Hounslow)
ID3	Email from TfL to Victoria Porter re WebCAT datasets (7 February 2020)
ID4	Opening submissions for the appellant
ID5	Opening submissions for the Council
ID6	Decision Notice for the former Nestle Factory (No 1331/APP/2017/1883)
ID7a	Draft planning obligation
ID7b	CIL Compliance Schedule and Appendices
ID8	Design and Access Statement 3 Viveash Close
ID9a	Amended Plan - Fourth Floor Plan proposed No 1820-1104 Rev E
ID9b	Amended Plan - Fifth Floor Plan Amenity No 1820-0480
ID9c	Amended Plan - Eighth Floor Amenity No 1820-0481
ID10	Statement of common ground: Affordable Housing
ID11	Appearances for the Council
ID12a	Amended Plan - Fourth Floor Plan proposed No 1820-1104 Rev F
ID12b	Amended Plan - Fifth Floor Plan proposed No 1820-1105 Rev F
ID12c	Amended Plan - Eighth Floor Plan proposed No 1820-1108 Rev E
ID12d	Amended Plan - Nestles Avenue Elevation proposed No 1820-1301 Rev C
ID13	Suggested planning conditions (amended)
ID14	Amended version of the draft planning obligation
ID15	Revised CIL compliance schedule
ID16	Addendum to the Statement of Common ground relating to amenity space including further amended plans

- ID17 Final schedule of suggested planning conditions
- ID18 Council's closing submissions
- ID19 Appellant's closing submissions
- ID20 Appellant's written application for costs
- ID21 Council's costs rebuttal

SUBMITTED AFTER CLOSING WITH THE AGREEMENT OF THE PARTIES

- ID22 Signed S106 Agreement
- ID23 Email dated 6 February from the appellant to the Council re concerns about potentially wasted costs

APPENDIX B. COSTS DECISION



Costs Decision

Inquiry opened on 18 February 2020

Site visit carried out on the same day

by Mrs J A Vyse DipTP Dip PBM MRTPI

an Inspector appointed by the Secretary of State

Decision date: 26th March 2020

Costs application in relation to Appeal Ref: APP/R5510/W/19/3230503 Stanford House, 9 Nestles Avenue, Hayes, UB3 4SA

- The application is made under the Town and Country Planning Act 1990, sections 78, 320 and Schedule 6, and the Local Government Act 1972, section 250(5).
 - The application is made by Healey Development Solutions (Hayes) Limited for a partial award of costs against the Council of the London Borough of Hillingdon.
 - The Inquiry was in connection with an appeal against the failure of the Council to issue a notice of their decision within the prescribed period on an application for planning permission for demolition of existing building and redevelopment to provide a building up to ten storeys, with 868 square metres of commercial or community space (Use Class B1 or D1) at ground and first floor level and 81 (44 x one bed, 28 x 2 bed and 9 x 3 bed) residential units to the upper floors with associated landscaping, access, car parking and cycle parking.
-

Decision

1. For the reasons that follow, the application for an award of costs is allowed in the terms set out below.

The Submissions for Healey Development Solutions (Hayes) Limited

2. The positions of the parties in relation to costs was reserved from the outset. In the event, the Council has acted unreasonably in that it failed to provide any evidence to substantiate its contention that the scheme would be materially harmful to highway safety.
3. The Appellant repeatedly contacted the Council before the Inquiry requesting that the point should be withdrawn in order to avoid further wasted costs, but the Council rejected that invitation. In particular, on 6 February 2020 the appellant wrote to the Council drawing attention to highlighted sections of the Authority's Third Local Implementation Plan 2019-2041 (LIP3), on which basis the appellant's highways consultant concluded that the related putative reason for refusal (RfR6) was fundamentally flawed and was in complete contradiction to the Council's own policies. Notwithstanding the suggestion in the email that, in order to prevent further wasted costs on this matter RfR6 be withdrawn, the Council continued to defend it at the Inquiry.
4. To make out its case, the Council would have to demonstrate that despite the scheme not having any on-site parking, despite all the shops and services available in Hayes town centre being within easy access on foot, despite the site being within a stone's throw of Hayes and Harlington station which will be an Elizabeth Line station when the scheme opens, despite the plethora of bus routes and rail services serving the area, despite future residents being members of a car club and despite the daytime parking restrictions around the

site, significant numbers of future residents would choose to run their own cars to the extent that they would a) impede the free flow of traffic as they *'cruise around looking for somewhere to park, then take time to manoeuvre into position'*¹ and b) present a risk to road safety by parking *'in inappropriate locations.'*²

5. The Council rightly abandoned its contention that the scheme be harmful in terms of its impact on the free flow of traffic.³ That was always an unreasonable point to run.
6. The assertion that there would be a significant number of occupiers who would choose to run their own cars flies in the face of the Council's own conclusion in relation to the approved Site A scheme, namely that residents who could not park on the site itself would *'be discouraged from owning a car, choosing instead to cycle, walk or travel by public transport instead.'*⁴ If those people who could not park on Site A would be discouraged, so too would those who could not park on Site B.
7. The Council's position is also unrealistic given the extensive public transport available on the site's doorstep. The site is currently served by approximately 50 buses per hour and there are regular rail services from Hayes and Harlington into London Paddington, providing easy access to both central London and wider destinations nationwide. There is very easy access too to all Heathrow terminals, as well as Reading and numerous other destinations. All this will improve still further when the Elizabeth Line opens. The site is also within easy walking and cycling distance of the town centre and all its shops and services which cater for residents' daily needs, and car club membership would be available to all future residents, residents who would not be able to park in the Parking Management Zone in the day-time. These considerations clearly serve as a major discouragement to anyone thinking about running their own car.
8. Finally there is simply no evidence to suggest that anyone, let alone significant numbers of people, who did choose to run their own car would park in a way that harmed highway safety. As set out above, the Council abandoned its argument that drivers from the appeal scheme would *'impede the free flow of traffic.'* There is some unrestrained parking in the area (eg Harold Way) and there is plenty of on-street capacity in the area in the evenings.⁵ As such, in the unlikely event that someone did run their own car, there is no reason why they would park it in a way that compromised highway safety. As to illegal parking, parking in the daytime in the Parking Management Zone without a permit is not of itself inherently unsafe, and anyone parking for example on yellow lines, could be enforced against in the usual way by the Council. In short, there is no reason to assume that significant numbers of residents would even want their own car, let alone park in a way that would cause an unacceptable impact on highway safety. It was unreasonable for the Council to run this point at the Inquiry.
9. Further, and in any event, the Council's position is contrary to policy. The Local Plan contains maximum parking standards (policy DMT6). The scheme

¹ Dr Tilley proof page 11 paragraph 7.15

² Ibid

³ Dr Tilley roundtable session and Mr Volley cross examination

⁴ LIP3 page 102 (last paragraph)

⁵ Parking Survey Results at Appendix VLP R8 to Ms Porter's Rebuttal Statement

- would comply with the policy in that it would not exceed the maximum standards. As set out above, there is no highway safety case that would justify higher provision. The same is true of London Plan policy 6.13.
10. With regard to emerging policy, it is common ground that the emerging London Plan should be given substantial weight. Policy T6 makes it clear that *'car-free development should be the starting point for all development proposals that are (or are planned to be) well-connected by public transport.'* At the end of the Inquiry it was common ground that the site is currently PTAL 4 and will be PTAL 5 when the Elizabeth Line opens.⁶ It is also common ground now that in order to comply with policy T6, the scheme should be car free.⁷ Those points should have been agreed before the Inquiry started and the point should never have been pursued.
 11. Dr Tilly sought to argue that there are specific factors in play in Hillingdon that mean reliance should not be placed on the site's PTAL ratings eg service cancellations and noisy schoolchildren putting people off using the bus, but he was unable to point to any policy support for this approach. Indeed, his approach runs directly contrary to the emerging London Plan, which states in terms that: *'Differences in car use and ownership between inner and outer London are recognised, with trip distances and trip patterns sometimes making walking and cycling difficult in outer London'*, before going on to make plain that *'The approach to parking in outer London Opportunity Areas should be set out in Opportunity Area Planning Frameworks, completing the OA mode share target. Through OAPFs, parking provision can vary within an outer London to reflect PTAL, but the overall quantum must not exceed the relevant maximum standard.'* (emphasis added: see the supporting text to Policy T6).
 12. It is absolutely plain that this is a site which can support car-free development. The Council's assertion to the contrary was unreasonable. It provided no evidence to support its case and a costs award is justified in this regard.

The Response by the Council

13. The basis of the appellant's application is nothing more than a disagreement with the judgements of the appropriately qualified transport witness who gave evidence in relation to the corresponding RfR. Such disagreements are not a legitimate basis for seeking an award of costs. The appellant has not identified any unreasonable behaviour that would justify an award of costs.
14. In pursuit of its application, the appellant alleges that the Council acted unreasonably in that it has failed to provide any evidence to support its contention in relation to the reasons for refusal. That is demonstrably not the case. The Council called Dr Tilly who gave evidence on this issue. His credibility, impartiality and expertise were not challenged, or in any way called in to question. What appears now to be said is that his evidence was 'unrealistic'. By this, the appellant simply means in fact that they disagree with Dr Tilly's analysis.
15. Whether or not future residents would choose to run their own cars is an inherently predictive exercise. It requires a judgement to be made about likely future behaviour. This is an issue upon which there is considerable scope for

⁶ Confirmed by Dr Tilley at the Inquiry. This confirmation supersedes the Council's previous assertion that the site would have a PTAL of 4 in 2021 and 2031 as set out at page 10 of the Highways Statement of Common Ground.

⁷ Confirmed by Dr Tilley at the Inquiry.

legitimate disagreement amongst professionals. Dr Tilly recognised that the absence of parking might discourage some residents from owning a car, but his concern is that they would not all be discouraged from doing so. There is no inconsistency with its approach to Site A, where it also sought a car-lite development, albeit at a higher level than is sought here, to reflect the poorer PTAL rating of Site A. That factors such as the location of shops and services, the availability of public transport, the presence of car club and the location of available parking would, in the appellant's view discourage any car use does not make Dr Tilly's evidence unreasonable. Certainly, it is not a proper basis for an award of costs.

16. The Council has not alleged conflict with policy DMHT 6, which set the Council's maximum parking standards, or with any of the parking standards in the London Plan or emerging Plan. As the appellant begrudgingly recognises, the Council's case was that there were '*specific factors in play*' in this location that justify the provision of some parking. Again, the appellant seeks to elevate its disagreement with this professional judgement into an allegation of unreasonable behaviour. It is no such thing. Dr Tilly was entitled to refer to specific factors which, in his expert professional opinion, merited the provision of some parking in this case, albeit well below the Local Plan policy maxima. He did not act unreasonably.
17. Further, it is notable that the appellant did not indicate any intention to apply for an award of costs following receipt of Dr Tilly's proof, at the start of the Inquiry, or following the related round table session at the Inquiry. At no point did it indicate that it regarded the evidence on this issue as justifying an award of costs.
18. The appellant does not identify and substantiate a specific example of unreasonable behaviour referred to in the PPG. As already stated, it cannot credibly be argued that the Council did not produce evidence in support of RfR6, in circumstances where a relevant professional whose credibility was not challenged, gave expert evidence on the issue. There is simply no justification for an award of costs in this case.

Reasons

19. It is good practice that applications for costs should, where circumstances allow, be made in writing before the hearing or Inquiry. Although neither party anticipated making any such application at the time of the case management conference, positions were reserved pending the hearing of the evidence. Having heard the Council's highways evidence, the appellant chose to make an application. Provided any application is made before the close of the Inquiry, it can be entertained. In this case, the application was submitted in writing in sufficient time for the Council to consider the matters raised and provide a written response. I find no harm or prejudice in this regard.
20. The Planning Practice Guidance states that irrespective of the outcome of an appeal, costs may only be awarded against a party who has behaved unreasonably and thereby caused the party applying for costs to incur unnecessary or wasted expense in the associated appeal process. The same guidance makes it clear that local planning authorities are at risk of an award of costs if they behave unreasonably with respect to the substance of the matter under appeal. Failing to produce evidence to substantiate a reason for refusal on appeal, or making vague, generalised or inaccurate assertions about

a proposal's impact which are unsupported by any objective analysis, are cited as examples⁸ and are reflected in the applicant's claim.

21. The integrity and professional expertise of the appellant's highways witness is not in question. In light of the Planning Practice Guidance though, it was incumbent upon the Council to produce evidence to support its highways related concerns set out in RfR6.
22. The Council maintained that the PTAL ratings, which inform maximum parking standards in the relevant policies, do not fully reflect the situation in Hillingdon (an outer London Borough) but referred only to anecdotal evidence relating, for instance, to noisy school children and overcrowding, together with punctuality issues making bus travel unattractive. Reference was also made to travel to work and car ownership patterns derived from the 2011 census data. The Council's view was that those trends would continue to the extent that a significant number of future residents (estimated as some 40-60 residents in the oral evidence of Dr Tilly in the related discussion at the Inquiry) would be likely to own a private car for use on a daily basis to access employment. However, the Council's stance in terms of taking that historic position forward was not supported by any substantiated evidence, or by reference to relevant policies and guidance.
23. At the start of the Inquiry, the Council's position as set out in the Highways Statement of Common/Uncommon Ground, was that the PTAL rating of the site would remain at level 4 (good) in the future and would not increase to PTAL 5 (very good) on opening of the Elizabeth Line (Cross Rail) even together with the recent introduction of two additional bus services locally. However, its position changed during the Inquiry, when it conceded that the rating would rise to PTAL 5 at around the time that the development might be occupied.
24. Policy T6 of the emerging London Plan, agreed by the Council as attracting substantial weight in this appeal, states that parking should be restricted in line with levels not only of existing, but also future public transport accessibility and connectivity, with car-free development being the starting point for all new development in places that are, or are planned to be, well-connected by public transport. It requires that the maximum parking standards set out in policy T6.1 should be observed, with the policy referring to the standards in Table 10.3. The Table specifically recognises that there are differences between inner and outer London Boroughs with the same PTAL ratings, setting higher maximum parking provisions for outer London Boroughs. Significantly though, for **all** areas with a PTAL rating of 5-6, the Table is clear that development should be car free.
25. The Council's evidence did not acknowledge that employment destinations it referred to outwith the Borough, such as Reading and Slough, would be served by the new Elizabeth Line around the time that the development might start to be occupied. Moreover, using the same 2011 census database as the Council, the appellant demonstrated that by far the majority of existing residents who live in the same area as the appeal site, were in fact employed within a London Borough (ie not outside Greater London) with almost half employed within Hillingdon and with around 30% employed within the Middle Super Output Area which includes Heathrow airport, a key employment location for local residents, a location that is connected directly by bus and rail with those connections set

⁸ Paragraph: 049 Reference ID: 16-049-20140306

to improve in the future. The next main destination for around 15% of residents travelling to work was Hayes town centre, which is within walking distance of the site, with the other locations referred to by the Council not being 'key' destinations at all.

26. The Council's case did not deal with the 'buy to rent' nature of the development, with the unchallenged evidence of the appellant demonstrating that tenants of such schemes generally have a lower parking demand than owner-occupied developments. It also failed to recognise that its own policies and related guidance clearly anticipate a behaviour change and a move to car free development. In particular, its own LIP3 includes specific objectives promoting sustainable travel to encourage a reduction in car use and supporting new development environments that prioritise sustainable travel. LIP3 also confirms that car-free development facilitates behaviour change for residents from the onset of occupying a dwelling in an area that has limited or no parking.
27. It is noteworthy that both the GLA, through its Stage 1 comments, and TfL advised the Council that they strongly welcomed and supported the car free nature of the development proposed. Moreover, in coming to a view on likely car ownership, the Council's evidence made no assessment of the considerable range of services and facilities that are readily available in the town centre, within easy walking/cycling distance from the site, making it one of the most accessible locations in the Borough.
28. Neither was any objective evidence provided to support its contention that in the unlikely event that some future occupiers did own a car, parking on the highway in observance of the existing parking restrictions (which include a resident's parking scheme that future occupiers would be ineligible for) would, of itself, have a necessarily adverse effect on highway safety. Whilst RfR6 refers to concerns in relation to potential on-street parking being detrimental to the free flow of traffic, the Council's evidence did not, in the event, address this aspect. I recognise that parking enforcement in the area results in numerous parking notices being issued, demonstrating a disregard of those restrictions by some, but that is not evidence that such parking presents an unacceptable risk in terms of vehicular or pedestrian safety.
29. To conclude, I find that the Council produced no substantiated evidence or any objective analysis to support its position in relation to the matters raised by RfR6. That behaviour was unreasonable in the terms of the Planning Practice Guidance, which behaviour resulted in the appellant being put to unnecessary and wasted expense in having to prepare and present evidence on this matter. An award of costs in this regard is therefore justified.

Costs Order

30. In exercise of the powers under section 250(5) of the Local Government Act 1972 and Schedule 6 of the Town and Country Planning Act 1990 as amended, and all other enabling powers in that behalf, IT IS HEREBY ORDERED that the Council of the London Borough of Hillingdon shall pay to Healey Development Solutions (Hayes) Limited, the costs of the appeal proceedings described in the heading of this decision, limited to those costs incurred in dealing with the matters raised by the sixth of the putative reasons for refusal only. Such costs are to be assessed in the Senior Courts Costs Office if not agreed.

31. The applicant is now invited to submit to the Council of the London Borough of Hillingdon, to whom a copy of this decision has been sent, details of those costs with a view to reaching agreement as to the amount.

Jennifer A Vyse
INSPECTOR

APPENDIX C. PIA DATA



5 years to end February 2018 provisional

Summary of Accidents Selected

Site Reference and Description (zero accident counts shown in bold)	Date Period	Accidents
MP01 GIS AREA Nestles Ave Nov 2018 (P)	60 MTS TO FEB-2018	14

The description of how the accident 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

**5 years to end February 2018 provisional**

MP01 GIS AREA Nestles Ave Nov 2018 (P)	60 MTS TO FEB-2018 SORTED BY DATE
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1	0113XH30178	THU 18/04/13 18:51	LIGHT	STATION ROAD, 147M NORTH EAST OF JUNCTION WITH KEITH ROAD	26	LINK 67-68	509700 / 179430
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POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M PELICAN OR SIMILAR

PEDESTRIAN RAN OUT ACCROSS ROAD IN FRONT OF VEH 1 IN ORDER TO GET TO HIS FRIENDS CAR & WAS HIT BY VEH 1

CASUALTY 001 (001) (? Yrs - M CR0) SLIGHT PEDESTRIAN CROSSING ROAD WITHIN 50M XING W BOUND FROM DRIVERS O/SIDE

VEHICLE 001 (000) CAR (38 Yrs - M TW14) GOING AHEAD OTHER SW TO NE
BT - NEGATIVE O/S HIT FIRST

V001 B 405 (FAILED TO LOOK PROPERLY)

C001 A 802 (FAILED TO LOOK PROPERLY)

C001 A 808 (CARELESS/RECKLESS/IN A HURRY)

2	0113XH30435	THU 11/07/13 07:44	LIGHT	STATION RD 63M SOUTH WEST OF J/W NESTLE'S AVENUE	26	LINK 67-68	509540 / 179280
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POLICE - OVER COU ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M ZEBRA

PED RAN INTO PATH OF V1, CAUSING COLLISION.

CASUALTY 001 (001) (12 Yrs - M UB2) SLIGHT PEDESTRIAN CROSSING ROAD WITHIN 50M XING UNKNOWN FROM DRIVERS N/SIDE MSK

VEHICLE 001 (000) CAR (? Yrs - F UNKN) GOING AHEAD OTHER NE TO SW
BT - DRV NOT CONTACTED N/S HIT FIRST

C001 A 802 (FAILED TO LOOK PROPERLY)

C001 A 808 (CARELESS/RECKLESS/IN A HURRY)

3	0113XH30537	MON 21/10/13 15:14	LIGHT	NFL - STATION RD 133M SOUTH WEST OF J/W CLAYTON RD	26	LINK 67-68	509700 / 179420
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POLICE - AT SCENE ROAD-WET WEATHER-FINE SINGLE CWY NO JUN IN 20M ZEBRA

PED RAN IN FRONT OF STAT BUS THAT V1 WAS OVERTAKING, CAUSING COLLISION.

CASUALTY 001 (001) (8 Yrs - M SL2) SLIGHT PEDESTRIAN CROSSING ROAD WITHIN 50M XING UNKNOWN FROM DRIVERS N/SIDE MSK
JOURNEY TO/FROM SCHOOL Sch Attended : LITTLE DOWN SPECIAL SCHOO

VEHICLE 001 (000) CAR (42 Yrs - M UB3) OVERTAKE STAT VEH O/S NE TO SW
BT - NOT REQUESTED N/S HIT FIRST

C001 A 802 (FAILED TO LOOK PROPERLY)

C001 A 808 (CARELESS/RECKLESS/IN A HURRY)

C001 A 801 (CROSSED ROAD MASKED BY STATIONARY OR PARKED VEHICLE)

V001 A 701 (VISION AFFECTED - STATIONARY OR PARKED VEHICLE(S))

**5 years to end February 2018 provisional**

MP01 GIS AREA Nestles Ave Nov 2018 (P)	60 MTS TO FEB-2018 SORTED BY DATE
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4 0114XH30246 TUE 15/04/14 16:50 LIGHT STATION ROAD 110M NORTH EAST J/W KEITH ROAD	26 LINK 67-68	509680 / 179400
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POLICE - OVER COU ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M	NO XING FACILITY IN 50M
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PED CROSSED ROAD INTO PATH OF V1 MASKED BY STATIONARY VEHICLE

CASUALTY 001 (001) (20 Yrs - M UB5) SLIGHT PEDESTRIAN	CROSSING ROAD (NOT ON XING) E BOUND FROM DRIVERS N/SIDE MSK
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VEHICLE 001 (000) CAR (? Yrs - M UB3)	OVERTAKE STAT VEH O/S S TO N
BT - DRV NOT CONTACTED	FRONT HIT FIRST

C001 A 801 (CROSSED ROAD MASKED BY STATIONARY OR PARKED VEHICLE)
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C001 A 802 (FAILED TO LOOK PROPERLY)

C001 A 808 (CARELESS/RECKLESS/IN A HURRY)

5 0114XH30529 SUN 31/08/14 17:35 LIGHT STATION ROAD, 106M SW OF J/W STATION APPROACH	26 LINK 67-68	509700 / 179420
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POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M	NO XING FACILITY IN 50M
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C1 FELL OVER ON V1 AS V1 PULLED AWAY FROM BUS STOP - [BUS PASSENGER NOT HOLDING ON PROPERLY (C001)]

CASUALTY 001 (001) (45 Yrs - F UB3) SLIGHT PASSENGER	STANDING ON PSV
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VEHICLE 001 (000) BUS/COACH (35 Yrs - M TW8)	MOVING OFF	NE TO SW JNY PART OF WORK
BT - NOT REQUESTED	DID NOT IMPACT	

C001 A 999 (OTHER FACTOR)

6 0115XH30791 TUE 03/11/15 08:20 LIGHT STATION RD 105M NORTH EAST OF J/W KEITH RD	26 LINK 67-68	509680 / 179390
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POLICE - OVER COU ROAD-DRY WEATHER-FINE SINGLE CWY NO JUN IN 20M	NO XING FACILITY IN 50M
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PED STEPPED INTO PATH OF V1, CAUSING COLLISION.

CASUALTY 001 (001) (23 Yrs - F UB10) SLIGHT PEDESTRIAN	CROSSING ROAD (NOT ON XING) UNKNOWN
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VEHICLE 001 (000) CAR (? Yrs - U UNKN)	GOING AHEAD OTHER	NE TO SW
BT - DRV NOT CONTACTED	FRONT HIT FIRST	

C001 A 802 (FAILED TO LOOK PROPERLY)

C001 A 808 (CARELESS/RECKLESS/IN A HURRY)

**5 years to end February 2018 provisional**

MP01 GIS AREA Nestles Ave Nov 2018 (P)	60 MTS TO FEB-2018 SORTED BY DATE
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7 0116XH30040 TUE 26/01/16 09:55 LIGHT STATION ROAD, 131M NE OF J/W KEITH ROAD	26 LINK 67-68	509700 / 179420
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POLICE - AT SCENE ROAD-DRY WEATHER-UNKNOWN SINGLE CWY NO JUN IN 20M	ZEBRA
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C1 HAS RUN ACROSS ROAD FROM BEHIND A STATIONARY BUS, INTO PATH OF V1 & WAS HIT
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CASUALTY 001 (001) (31 Yrs - F W4) SLIGHT PEDESTRIAN CROSSING ROAD WITHIN 50M XING NW BOUND FROM DRIVERS N/SIDE MSK

VEHICLE 001 (000) CAR (? Yrs - F UNKN) GOING AHEAD OTHER NE TO SW	FRONT HIT FIRST
BT - DRV NOT CONTACTED	

C001 A 801 (CROSSED ROAD MASKED BY STATIONARY OR PARKED VEHICLE)
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C001 A 802 (FAILED TO LOOK PROPERLY)

C001 A 803 (FAILED TO JUDGE VEHICLE'S PATH OR SPEED)
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C001 A 808 (CARELESS/RECKLESS/IN A HURRY)

V001 A 701 (VISION AFFECTED - STATIONARY OR PARKED VEHICLE(S))
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8 0116XH30310 SAT 14/05/16 09:02 LIGHT STATION ROAD J/W NESTLE'S AVENUE	26 LINK 67-68	509590 / 179320
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POLICE - AT SCENE ROAD-DRY WEATHER-FINE SINGLE CWY T/STAG JUN GIVE WAY/UNCONT NO XING FACILITY IN 50M

V1 TURNED LEFT ACROSS PATH V2

CASUALTY 001 (002) (43 Yrs - M UB3) SLIGHT DRIVER/RIDER

VEHICLE 001 (002) CAR (24 Yrs - M UB6) TURNING LEFT NE TO SE	JCT MID
BT - NOT REQUESTED	N/S HIT FIRST

VEHICLE 002 (001) PEDAL CYCLE (43 Yrs - M UB3) GOING AHEAD OTHER NE TO SW	JCT MID
BT - NOT APPLICABLE	FRONT HIT FIRST

V001 A 406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)

V001 A 602 (CARELESS/RECKLESS/IN A HURRY)

9 01160021376 SAT 17/09/16 19:35 DARK ON NESTLES AVENUE, NEAR THE JUNCTION WITH UNKNOWN.	26 CELL 509500/179000	509820 / 179180
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SELF COMPLETION ROAD-DRY WEATHER-FINE SINGLE CWY PRIV DRIVE GIVE WAY/UNCONT NO XING FACILITY IN 50M

V1 STOPPED TO LET C1'S MOTHER CROSS DRIVEWAY, V1 THEN STARTED AGAIN TO REVERSE AND STRUCK C1, BRIEFLY PINNING HER TO A PARKED VEHICLE

CASUALTY 001 (001) (14 Yrs - F UB34) SLIGHT PEDESTRIAN ON FOOTPATH - VERGE SE BOUND

VEHICLE 001 (000) CAR (46 Yrs - M UB34) REVERSING SW TO NE	JCT APP
BT - DRV NOT CONTACTED	BACK HIT FIRST

FOOTWAY

**5 years to end February 2018 provisional**

MP01 GIS AREA Nestles Ave Nov 2018 (P)										60 MTS TO FEB-2018 SORTED BY DATE	
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10	01160004185	FRI 18/11/16 08:30	LIGHT	NESTLES AVENUE J/W STATION ROAD						26	CELL 509500/179000	509630 / 179260
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SELF COMPLETION	UNKNOWN (S/R)	WEATHER-UNKNOWN	SINGLE CWY	CROSSROADS	GIVE WAY/UNCONT	UNKNOWN (S/R)						
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NOT KNOWN HOW COLLISION OCCURRED												
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CASUALTY	001 (001)	(53 Yrs - M UB3)	SLIGHT	DRIVER/RIDER								
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VEHICLE	001 (000)	PEDAL CYCLE	(53 Yrs - M UB3)	UNKNOWN (S/F GOING AHEAD OTHER	N TO S							LEAVING MAIN RD
		BT - NOT APPLICABLE			FRONT HIT FIRST							

UNKNOWN (S/R)												
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11	01170012345	TUE 17/01/17 17:15	DARK	STATION ROAD 105M N OF J/W KEITH ROAD						26	LINK 67-68	509680 / 179400
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POLICE - AT SCENE	ROAD-DRY	WEATHER-FINE	SINGLE CWY	NO JUN IN 20M								
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NOT KNOWN HOW COLLISION OCCURRED												
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CASUALTY	001 (001)	(37 Yrs - F UB3)	SLIGHT	PEDESTRIAN	CROSSING ROAD (NOT ON XING)	W BOUND	FROM DRIVERS O/SIDE					
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VEHICLE	001 (000)	CAR	(71 Yrs - F UB4)	GOING AHEAD OTHER	S TO N							
		BT - DRV NOT CONTACTED			FRONT HIT FIRST							

V001	B	405 (FAILED TO LOOK PROPERLY)										
------	---	-------------------------------	--	--	--	--	--	--	--	--	--	--

12	01170026004	SAT 11/03/17 13:00	LIGHT	STATION ROAD 50M SW OF J/W OLD STATION ROAD						26	LINK 67-68	509540 / 179280
-----------	-------------	--------------------	-------	---	--	--	--	--	--	----	------------	-----------------

SELF COMPLETION	UNKNOWN (S/R)	WEATHER-UNKNOWN	UNKNOWN	NO JUN IN 20M	UNKNOWN (S/R)	UNKNOWN (S/R)						
					UNKNOWN (S/R)	UNKNOWN (S/R)						

NOT KNOWN HOW COLLISION OCCURRED												
----------------------------------	--	--	--	--	--	--	--	--	--	--	--	--

CASUALTY	001 (001)	(26 Yrs - M UB3)	SLIGHT	PEDESTRIAN	CROSSING ROAD (NOT ON XING)	UNKNOWN	FROM DRIVERS N/SIDE MSK					
----------	-----------	------------------	--------	------------	-----------------------------	---------	-------------------------	--	--	--	--	--

VEHICLE	001 (000)	CAR	(42 Yrs - F UB3)	OVERTAKE STAT VEH O/S	U(TO U(							
		BT - DRV NOT CONTACTED			N/S HIT FIRST							

UNKNOWN (S/R)												
---------------	--	--	--	--	--	--	--	--	--	--	--	--

**5 years to end February 2018 provisional**

MP01 GIS AREA Nestles Ave Nov 2018 (P)	60 MTS TO FEB-2018 SORTED BY DATE
--	-----------------------------------

13	01170059867	SAT 19/08/17 21:29	LIGHT	STATION ROAD J/W STATION ROAD	26	NODE 67	509510 / 179260
SELF COMPLETION			UNKNOWN (S/R)	WEATHER-OTHER	UNKNOWN	MULTI JUN	UNKNOWN (S/R)
							UNKNOWN (S/R)
							UNKNOWN (S/R)

NOT KNOWN HOW COLLISION OCCURRED

CASUALTY 001 (001) (39 Yrs - M UB3) SLIGHT DRIVER/RIDER

VEHICLE	001 (000)	CAR	(39 Yrs - M UB3)	UNKNOWN (S/F GOING AHEAD OTHER	U(TO U(	UNKNOWN (S/R)
		BT - NOT REQUESTED		UNKNOWN (S/R)	UNKNOWN (S/R)	
		UNKNOWN (S/R)		UNKNOWN (S/R)	UNKNOWN (S/R)	UNKNOWN (S/R)

VEHICLE	002 (000)	CAR	(? Yrs - M UNKN)	UNKNOWN (S/F GOING AHEAD OTHER	U(TO U(	UNKNOWN (S/R)
		BT - REFUSED TO PROVIDE		UNKNOWN (S/R)	UNKNOWN (S/R)	
		UNKNOWN (S/R)		UNKNOWN (S/R)	UNKNOWN (S/R)	UNKNOWN (S/R)

VEHICLE	003 (000)	CAR	(? Yrs - M UB03)	UNKNOWN (S/F GOING AHEAD OTHER	U(TO U(	UNKNOWN (S/R)
		BT - NOT PROVD (MEDCL REASONS)		UNKNOWN (S/R)	UNKNOWN (S/R)	
		UNKNOWN (S/R)		UNKNOWN (S/R)	HIT OTH OBJECT	UNKNOWN (S/R)

VEHICLE	004 (000)	CAR	(? Yrs - M UNKN)	UNKNOWN (S/F GOING AHEAD OTHER	U(TO U(	UNKNOWN (S/R)
		BT - NOT REQUESTED		UNKNOWN (S/R)	UNKNOWN (S/R)	
		UNKNOWN (S/R)		UNKNOWN (S/R)	UNKNOWN (S/R)	UNKNOWN (S/R)

14	01180082183	MON 08/01/18 06:50	LIGHT	STATION ROAD 100M S OF J/W CLAYTON ROAD	26	CELL 509500/179000	509717 / 179455
POLICE - AT SCENE			ROAD-DRY	WEATHER-FINE	SINGLE CWY	NO JUN IN 20M	ZEBRA

NOT KNOWN HOW COLLISION OCCURRED

CASUALTY 001 (001) (32 Yrs - M CW10) SLIGHT PEDESTRIAN CROSSING ROAD ON PED XING E BOUND FROM DRIVERS O/SIDE

VEHICLE	001 (000)	CAR	(47 Yrs - F TW5)	SLOWING OR STOPPING	N TO S	COMM TO/FROM WORK
		BT - NOT REQUESTED			FRONT HIT FIRST	

V001 A 705 (VISION AFFECTED - DAZZLING HEADLIGHTS)

V001 A 405 (FAILED TO LOOK PROPERLY)

End of Accidents for MP01 GIS AREA Nestles Ave Nov 2018 (P)

End of Report



SUMMARY OF COLLISIONS SELECTED		
SITE REFERENCE AND DESCRIPTION	DATE PERIOD	ACCIDENT COUNT
TOPIC BASED QUERY		12
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		

TOPIC BASED QUERY

1

01170012345	TUE 17/01/2017 17:15	DARK	STATION RD 105M N OF J/W KEITH RD			26 LINK 67-68	509680/179400
POLICE - AT SCENE	ROAD-DRY	WEATHER-FINE	SINGLE CWY	NO JUN IN 20M	N/A	ZEBRA XING	NONE IN 50M
CASUALTY	001 (001)	(37 YRS - F - REDA)	SLIGHT	PEDESTRIAN	W BOUND	FROM DRIVERS O/SIDE	
VEHICLE	001 (000)	CAR BT - DRV NOT CONTACTED	(71 YRS - F - REDACT)		G/AHEAD - OTHER	(S TO N) FRONT HIT FIRST	J/P - UNKN
V001	B	405 (FAILED TO LOOK PROPERLY)					

2

01170026004	SAT 11/03/2017 13:00	LIGHT	STATION RD 50M SW OF J/W OLD STATION RD			26 LINK 67-68	509540/179280
SELF-REPORTED	UNKNOWN S/R	WEATHER-UNKNOWN	UNKNOWN	NO JUN IN 20M	N/A	UNKNOWN S/R	UNKNOWN S/R
CASUALTY	001 (001)	(26 YRS - M - REDA)	SLIGHT	PEDESTRIAN	UNKNOWN	FROM DRIVERS N/SIDE - MASKED	
VEHICLE	001 (000)	CAR BT - DRV NOT CONTACTED	(42 YRS - F - REDACT)		O/TAKING - NON MOVING VEH	(MOVE UNKN) N/S HIT FIRST	J/P - UNKN

3

01170059867	SAT 19/08/2017 21:29	LIGHT	STATION RD J/W STATION RD			26 NODE 67	509510/179260
SELF-REPORTED		UNKNOWN S/R	WEATHER-OTHER	UNKNOWN	MULTI JUN	UNKNOWN S/R	UNKNOWN S/R
CASUALTY	001 (001)	(39 YRS - M - REDA)	SLIGHT	DRIVER/RIDER			
VEHICLE	001 (000)	CAR BT - NOT REQ	(39 YRS - M - REDACT)	UNKNOWN S/R	G/AHEAD - OTHER	(MOVE UNKN) UNKNOWN S/R	J/P - UNKN UNKNOWN S/R
VEHICLE	002 (000)	CAR BT - REFUSED	(? YRS - M - REDACT)	UNKNOWN S/R	G/AHEAD - OTHER	(MOVE UNKN) UNKNOWN S/R	J/P - UNKN UNKNOWN S/R
VEHICLE	003 (000)	CAR BT - NOT PROVD	(? YRS - M - REDACT)	UNKNOWN S/R	G/AHEAD - OTHER	(MOVE UNKN) UNKNOWN S/R	J/P - UNKN UNKNOWN S/R
VEHICLE	004 (000)	CAR BT - NOT REQ	(? YRS - M - REDACT)	UNKNOWN S/R	G/AHEAD - OTHER	(MOVE UNKN) UNKNOWN S/R	J/P - UNKN UNKNOWN S/R

4

01180082183	MON 08/01/2018 06:50	LIGHT	STATION RD 100M S OF J/W CLAYTON RD			26 CELL 509500/179000	509717/179455
POLICE - AT SCENE	ROAD-DRY	WEATHER-FINE	SINGLE CWY	NO JUN IN 20M	N/A	ZEBRA XING	NONE IN 50M
NOT KNOWN HOW COLLISION OCCURRED							
CASUALTY	001 (001)	(32 YRS - M - REDA)	SLIGHT	PEDESTRIAN	E BOUND	FROM DRIVERS O/SIDE	
VEHICLE	001 (000)	CAR BT - NOT REQ	(47 YRS - F - REDACT)		SLOWING/STOPPING	(N TO S) FRONT HIT FIRST	COMMUTING
V001	A	705 (DAZZLING HEADLIGHTS)			V001	A	405 (FAILED TO LOOK PROPERLY)

5

01180119663	SUN 08/07/2018 14:10	LIGHT	STATION RD J/W NESTLES AVENUE			26 LINK 67-68	509590/179320
SELF-REPORTED	ROAD-DRY	WEATHER-OTHER	SINGLE CWY	T/STAG JUN	GIVEWAY /UNCONT	CNTL REFUGE N/O CTRLS	NONE IN 50M
NOT KNOWN HOW COLLISION OCCURRED							
CASUALTY	001 (001)	(30 YRS - F - REDA)	SLIGHT	DRIVER/RIDER			
VEHICLE	001 (000)	CAR BT - DRV NOT CONTACTED	(30 YRS - F - REDACT)		UNKNOWN S/R	(MOVE UNKN) FRONT HIT FIRST	COMMUTING UNKNOWN S/R
VEHICLE	002 (000)	CAR BT - DRV NOT CONTACTED	(? YRS - UNKNOWN - REDACT)		UNKNOWN S/R	(MOVE UNKN) UNKNOWN S/R	J/P - UNKN UNKNOWN S/R

6

01180121842	TUE 17/07/2018 16:30	LIGHT	STATION RD 40M S OF J/W CLAYTON RD			26 LINK 67-68	509710/179420
POLICE - AT SCENE	ROAD-DRY	WEATHER-FINE	SINGLE CWY	NO JUN IN 20M	N/A	PELICAN OR SIML	NONE IN 50M
NOT KNOWN HOW COLLISION OCCURRED							
CASUALTY	001 (001)	(14 YRS - F - REDA)	SLIGHT	PEDESTRIAN	W BOUND	FROM DRIVERS N/SIDE - MASKED	
VEHICLE	001 (000)	CAR BT - DRV NOT CONTACTED	(? YRS - UNKNOWN - REDACT)		G/AHEAD - OTHER	(N TO S) N/S HIT FIRST	J/P - UNKN
V001	B	602 (CARELESS, RECKLESS OR IN A HURRY)		C001	A	802 (FAILED TO LOOK PROPERLY)	

7

01180134680	MON 24/09/2018 19:10	DARK	NESTLES AVENUE J/W KEITH RD			26 LINK 67-68	509600/179320
POLICE - AT SCENE	ROAD-DRY	WEATHER-FINE	SINGLE CWY	T/STAG JUN	GIVEWAY /UNCONT	CNTL REFUGE N/O CTRLS	NONE IN 50M
NOT KNOWN HOW COLLISION OCCURRED							
CASUALTY	001 (002)	(35 YRS - M - REDA)	SLIGHT	DRIVER/RIDER			
VEHICLE	001 (000)	CAR BT - NEG	(17 YRS - M - REDACT)		TURNING RIGHT	(NE TO N) N/S HIT FIRST	J/P - UNKN L/MAIN RD
VEHICLE	002 (000)	WC >500CC BT - NEG	(35 YRS - M - REDACT)		G/AHEAD - L-HAND BEND	(W TO NE) FRONT HIT FIRST	J/P - UNKN JCT MID
V001	B	406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)			V002	B	406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)

8

01180143436	MON 05/11/2018 09:31	LIGHT	STATION RD 100M N OF J/W KEITH RD			26 LINK 67-68	509690/179400
POLICE - AT SCENE	ROAD-DRY	WEATHER-FINE	SINGLE CWY	NO JUN IN 20M	N/A	ZEBRA XING	NONE IN 50M
NOT KNOWN HOW COLLISION OCCURRED							
CASUALTY	001 (001)	(19 YRS - M - REDA)	SERIOUS	PEDESTRIAN	NW BOUND	FROM DRIVERS O/SIDE	
VEHICLE	001 (000)	CAR BT - NEG	(47 YRS - M - REDACT)		G/AHEAD - OTHER	(SW TO NE) FRONT HIT FIRST	J/P - UNKN
V001	B	405 (FAILED TO LOOK PROPERLY)			V001	B	406 (FAILED TO JUDGE OTHER PERSON'S PATH OR SPEED)

9

01180149984	WED 05/12/2018 00:22	DARK	STATION RD 200M S OF J/W STATION APPROACH			26 LINK 67-68	509690/179400
POLICE - AT SCENE	ROAD-WET	RAINING	SINGLE CWY	NO JUN IN 20M	N/A	NO XING FACIL IN 50M	NONE IN 50M
NOT KNOWN HOW COLLISION OCCURRED							
CASUALTY	001 (001)	(20 YRS - M - REDA)	SLIGHT	PEDESTRIAN	W BOUND	FROM DRIVERS N/SIDE	
VEHICLE	001 (000)	MC 51-125CC BT - NEG	(19 YRS - M - REDACT)	G/AHEAD - OTHER		(N TO S) FRONT HIT FIRST	J/P - UNKN
C001	A	802 (FAILED TO LOOK PROPERLY)		V001	B	602 (CARELESS, RECKLESS OR IN A HURRY)	
C001	A	808 (CARELESS, RECKLESS OR IN A HURRY)		C001	A	809 (PEDESTRIAN WEARING DARK CLOTHING AT NIGHT)	

10

01180153395	WED 19/12/2018 18:40	DARK	STATION APPROACH 100M N OF J/W KEITH RD			26 LINK 67-68	509680/179400
SELF-REPORTED	ROAD-DRY	WEATHER-FINE	SINGLE CWY	NO JUN IN 20M	N/A	ZEBRA XING	NONE IN 50M
NOT KNOWN HOW COLLISION OCCURRED							
CASUALTY	001 (001)	(22 YRS - M - REDA)	SLIGHT	PEDESTRIAN	W BOUND	FROM DRIVERS O/SIDE	
VEHICLE	001 (000)	CAR BT - DRV NOT CONTACTED	(? YRS - F - REDACT)	WAITING - HELD UP		(S TO N) FRONT HIT FIRST	J/P - UNKN

11

01190160306	TUE 29/01/2019 17:39	DARK	STATION APPROACH, NR JUNCT WTH STATION RD.			26 LINK 67-68	509689/179409
POLICE - AT SCENE	ROAD-WET	RAINING	SINGLE CWY	OTHER JUN	GIVEWAY /UNCONT	ZEBRA XING	NONE IN 50M
NOT KNOWN HOW COLLISION OCCURRED							
CASUALTY	001 (001)	(30 YRS - F - REDA)	SERIOUS	PEDESTRIAN	S BOUND	FROM DRIVERS O/SIDE	
VEHICLE	001 (000)	CAR BT - NOT REQ	(44 YRS - F - REDACT)		G/AHEAD - OTHER	(E TO W) FRONT HIT FIRST	JCT CLEARED
V001	A	103 (SLIPPERY ROAD (DUE TO WEATHER))			C001	A	802 (FAILED TO LOOK PROPERLY)
C001	A	803 (FAILED TO JUDGE VEHICLE'S PATH OR SPEED)			C001	A	808 (CARELESS, RECKLESS OR IN A HURRY)
C001	B	999 (OTHER - PLEASE SPECIFY BELOW)					

12

01190218678	FRI 15/11/2019 18:30	DARK	STATION RD , 25 METRES SOUTH OF JUNCT WTH STATION RD HAYES.			26 LINK 67-68	509716/179410
SELF-REPORTED	ROAD-WET	RAINING	DUAL CWY	NO JUN IN 20M		UNKNOWN S/R	UNKNOWN S/R
NOT KNOWN HOW COLLISION OCCURRED							
CASUALTY	001 (001)	(46 YRS - M - REDA)	SLIGHT	DRIVER/RIDER			
VEHICLE	001 (000)	TAXI/PHV BT - DRV NOT CONTACTED	(46 YRS - M - REDACT)		UNKNOWN S/R	(MOVE UNKN) BACK HIT FIRST	J/P - UNKN
VEHICLE	002 (000)	CAR BT - DRV NOT CONTACTED	(? YRS - UNKNOWN - REDACT)		UNKNOWN S/R	(MOVE UNKN) UNKNOWN S/R	J/P - UNKN UNKNOWN S/R
VEHICLE	003 (000)	CAR BT - DRV NOT CONTACTED	(39 YRS - F - REDACT)	UNKNOWN S/R	UNKNOWN S/R	(MOVE UNKN) UNKNOWN S/R	J/P - UNKN

APPENDIX D. PTAL CALCULATION

WebCAT PTAL Report

=====

Site Details

Grid Cell: 74236

Easting: 509845

Northing: 179252

Report Date: 03/02/2020

Scenario: 2021 (Forecast)

Calculation Parameters

Day of Week: M-F

Time Period: AM Peak

Walk Speed: 4.8 kph

Bus Node Max Walk Access Time (mins): 8

Bus Reliability Factor: 2.0

LU Station Max Walk Access Time (mins): 12

LU Reliability Factor: 0.75

National Rail Station Max Walk Access Time (mins): 12

National Rail Reliability Factor: 0.75

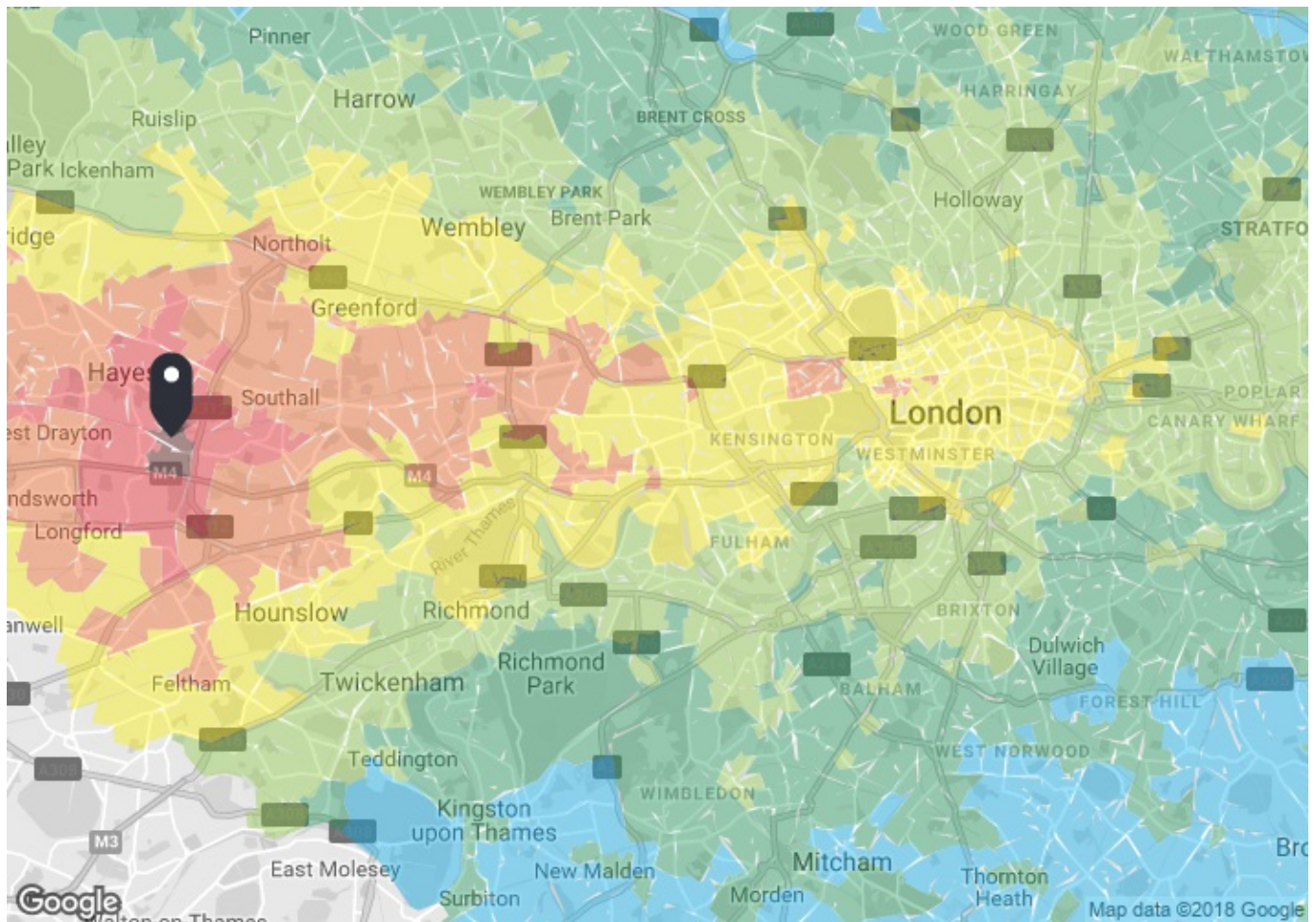
Mode	Stop	Route	Distance (i	Frequency	Walk Time	SWT (min:	TAT (mins	EDF	Weight	AI
Bus	HAYES & HARLINGTON STN		140	413.78	8.5	5.17225	5.529412	10.70166	2.803303	1 2.803303
Bus	HAYES & HARLINGTON STN H98			413.78	7.5	5.17225		6 11.17225	2.685225	0.5 1.342612
Bus	HAYES & HARLINGTON STN U4			413.78	7.5	5.17225		6 11.17225	2.685225	0.5 1.342612
Bus	HAYES & HARLINGTON STN E6			413.78	6	5.17225		7 12.17225	2.464622	0.5 1.232311
Bus	HAYES & HARLINGTON STN		90	413.78	6	5.17225		7 12.17225	2.464622	0.5 1.232311
Bus	HAYES & HARLINGTON STN U5			413.78	5	5.17225		8 13.17225	2.277515	0.5 1.138758
Bus	HAYES & HARLINGTON STN		350	413.78	5	5.17225		8 13.17225	2.277515	0.5 1.138758
Bus	HAYES & HARLINGTON STN		195	413.78	5	5.17225		8 13.17225	2.277515	0.5 1.138758
Rail	Hayes & Harlington	'ABBEYW-HTRW4 '	399.02		3.33	4.98775	9.759009	14.74676	2.034345	1 2.034345
Rail	Hayes & Harlington	'SHENFLD-RDNGSTN '	399.02		2	4.98775	15.75	20.73775	1.446637	0.5 0.723319
Rail	Hayes & Harlington	'RDNGSTN-PADTON 2P11 '	399.02		2	4.98775	15.75	20.73775	1.446637	0.5 0.723319
Rail	Hayes & Harlington	'PADTON-RDNGSTN 2R13 '	399.02		2	4.98775	15.75	20.73775	1.446637	0.5 0.723319
Rail	Hayes & Harlington	'SHENFLD-MDNHEAD '	399.02		1.33	4.98775	23.30639	28.29414	1.06029	0.5 0.530145
Rail	Hayes & Harlington	'WDRAYTN-ABBEYW '	399.02		1.33	4.98775	23.30639	28.29414	1.06029	0.5 0.530145
Rail	Hayes & Harlington	'HTRW4-SHENFLD '	399.02		1	4.98775	30.75	35.73775	0.839448	0.5 0.419724
Rail	Hayes & Harlington	'ABBEYW-MDNHEAD '	399.02		0.67	4.98775	45.52612	50.51387	0.593896	0.5 0.296948
Rail	Hayes & Harlington	'WDRAYTN-SHENFLD '	399.02		0.67	4.98775	45.52612	50.51387	0.593896	0.5 0.296948
Rail	Hayes & Harlington	'RDNGSTN-ABBEYW '	399.02		0.33	4.98775	91.65909	96.64684	0.310408	0.5 0.155204
Rail	Hayes & Harlington	'HTRW4-WWARSLS '	399.02		0.33	4.98775	91.65909	96.64684	0.310408	0.5 0.155204

Total PTAL 17.95804303

Bus	X140	413.78	5	5.17225	8	13.17225	2.277515	0.5	1.138758
Bus	278	413.78	4	5.17225	9.5	14.67225	2.044676	0.5	1.022338

Total PTAL 20.11913873 PTAL 5

APPENDIX E. TIM OUTPUT



TIM output for 2021 (Forecast)

Scenario: 2021 (Forecast) Mode: All public transport modes, Time of day: AM peak, Direction: From location

Nestles Avenue

Nestles Ave, Hayes UB3, UK

Easting: 509896, Northing: 179145

Report generated: 30/11/2018

This information is produced using forecasting tools and is subject to uncertainty

Population and employment: GLA forecasts 2016

Town Centres: GLA 2016

Education: EduBase 2016

Health: NHS Direct, CQC 2016

Code: WE086A05C

Map key - Travel Time

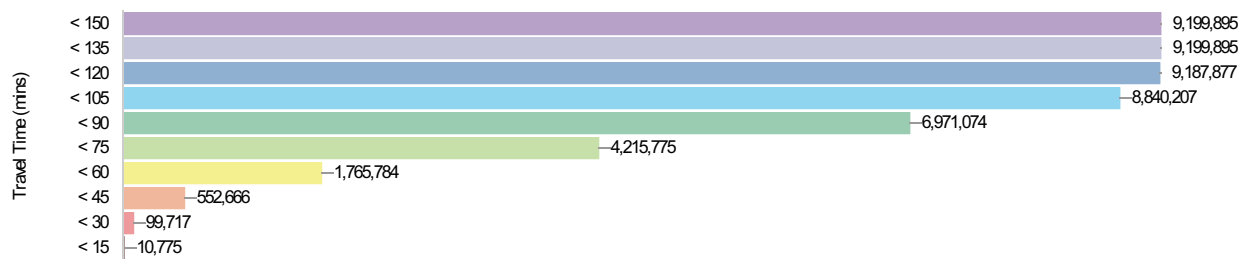
< 15 mins	15 - 30 mins
30 - 45 mins	45 - 60 mins
60 - 75 mins	75 - 90 mins
90 - 105 mins	105 - 120 mins
120 - 135 mins	135 - 150 mins

Map layers

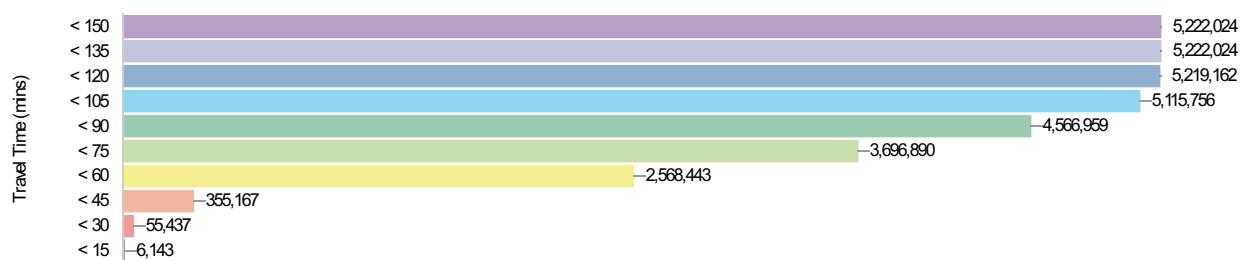
 Travel Times

Catchment data for your current selection

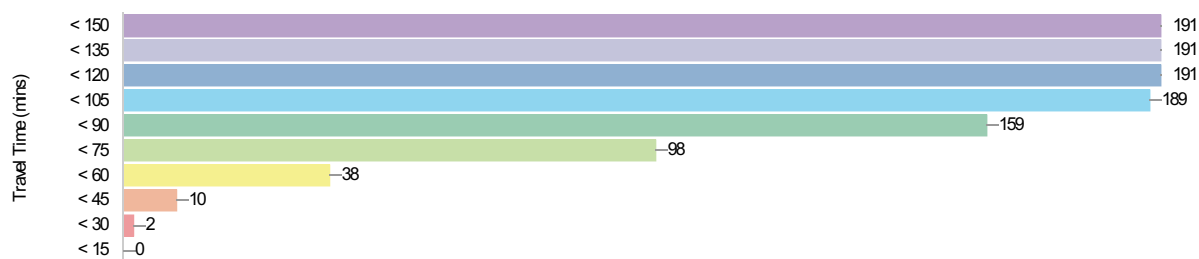
Population - Total: London 2021



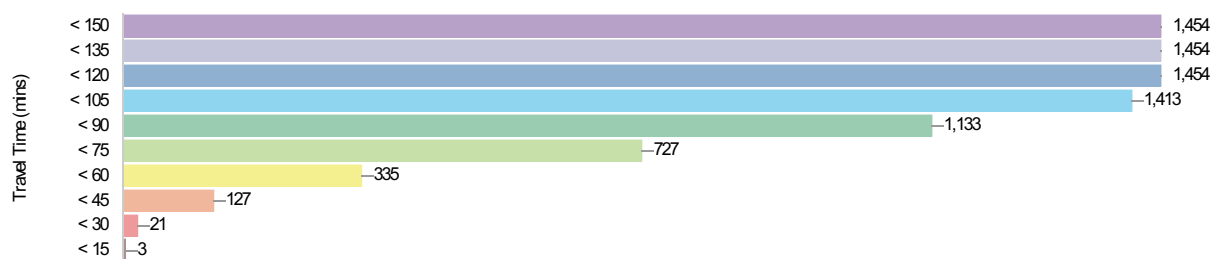
Employment - Jobs: London 2021



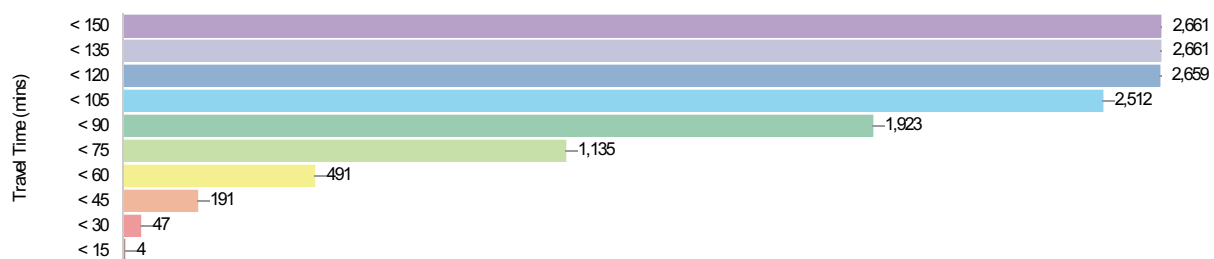
Town centres - Metropolitan, major and district: London



Health services - GP Surgeries: London



Education establishments - Primary schools: London



**APPENDIX F. RESPONSE TO REASON FOR REFUSAL 7 –
ITL14154-011 TN**

Technical Note

Project No: ITL14154
Project Title: Nestles Avenue, Hayes
Title: Reason for Refusal 7
Ref: ITL14154-011 TN
Date: 21 August 2019

SECTION 1 INTRODUCTION

- 1.1.1 This Technical Note has been produced in response to comments by Hillingdon Council in respect of a planning application for redevelopment of land at 9 Nestles Avenue, Hayes (planning ref 51175/APP/2018/4260) as part of the Appeal process (Appeal Ref: APP/R5510/W/19/3230503).
- 1.1.2 The appellant's Hearing Statement was submitted to the Planning Inspectorate in July 2019. That Hearing Statement set out detailed reasons that objected to Hillingdon Council's three highways and transportation Reasons for Refusal (Reasons 6, 7 and 8).
- 1.1.3 Following submission of the Hearing Statement, a response was received from Hillingdon Council which confirmed that the Council agreed that Reason for Refusal 8 would be removed, but that Reasons for Refusal 6 and 7 both remained contentious.
- 1.1.4 This note has been prepared in response to the Council's latest correspondence in respect of Reason for Refusal 7 only, concerning Highway Safety.

SECTION 2 REASON 7 – HIGHWAY SAFETY

2.1 Context

- 2.1.1 Reason 7 states that the proposed development '*by virtue of its layout and servicing and delivery arrangements [off] a layby along Nestles Avenue, would compromise highway and pedestrian safety by virtue of the proposed vehicular access into the site and the servicing and delivery arrangements, giving rise to conditions prejudicial to the free flow of traffic and would be detrimental to highway and pedestrian safety*'

2.1.2 LBH therefore state that the proposed development is contrary to 'Policy AM7 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policies DMT 2 and DMT 5 of the emerging Local Plan: Part 2 (March 2019), Policy 6.12 of the London Plan (2016) and Chapter 9 of the NPPF (2019)'.

2.1.3 Following review of the appellant's Hearing Statement the Council have subsequently written to the appellant and stated that 'Refusal Reason 7 (highway safety) remains contentious. The Council maintains its position that a dedicated service and delivery arrangement is required in this case to ensure the free flow of traffic and to safeguard pedestrians and cyclists making use of the Nestles Avenue sustainability corridor. The Councils statement of case will address these issues in more detail.

2.1.4 In order to move matters forward and reach an agreed position with the Council, this Technical note again addresses Reason 7 with further demonstration and justification that a fully off-carriageway loading bay will not be detrimental to the free-flow of traffic on Nestles Avenue, is not contrary to the Council's Policy and will in fact provide a level of betterment upon the existing situation at the same time as the site facilitating the creation of a new sustainability corridor, where its users (pedestrians and cyclists) will be safeguarded from delivery vehicles crossing the footway/ cycleway.

2.2 Consideration LBH Policy Grounds

Policy AM7 (Hillingdon Local Plan: Part Two - Unitary Development Plan Saved Policies (November 2012))

'THE LOCAL PLANNING AUTHORITY WILL CONSIDER WHETHER THE TRAFFIC GENERATED BY PROPOSED DEVELOPMENTS IS ACCEPTABLE IN TERMS OF THE CAPACITY AND FUNCTIONS OF EXISTING AND COMMITTED PRINCIPAL ROADS ONLY, AND WILL WHOLLY DISCOUNT ANY POTENTIAL WHICH LOCAL DISTRIBUTOR AND ACCESS ROADS MAY HAVE FOR CARRYING THROUGH TRAFFIC.

THE LOCAL PLANNING AUTHORITY WILL NOT GRANT PERMISSION FOR DEVELOPMENTS WHOSE TRAFFIC GENERATION IS LIKELY TO:

- i. UNACCEPTABLY INCREASE DEMAND ALONG ROADS OR THROUGH JUNCTIONS WHICH ARE ALREADY USED TO CAPACITY, ESPECIALLY WHERE SUCH ROADS OR JUNCTIONS FORM PART OF THE STRATEGIC LONDON ROAD NETWORK; OR**
- ii. PREJUDICE THE FREE FLOW OF TRAFFIC OR CONDITIONS OF GENERAL HIGHWAY OR PEDESTRIAN SAFETY; OR**
- iii. DIMINISH MATERIALLY THE ENVIRONMENTAL BENEFITS BROUGHT ABOUT BY NEW OR IMPROVED ROADS; OR**
- iv. INFILTRATE STREETS CLASSED AS LOCAL ROADS IN THE BOROUGH ROAD HIERARCHY UNLESS SATISFACTORY TRAFFIC CALMING MEASURES CAN BE INSTALLED.**

TRAFFIC CALMING SCHEMES SHOULD, WHERE APPROPRIATE, INCLUDE ENVIRONMENTAL IMPROVEMENTS SUCH AS HARD AND SOFT LANDSCAPING, AND SHOULD BE COMPLETED BEFORE THE DEVELOPMENT IS FIRST USED OR OCCUPIED.

Policy DMT 2 of the emerging Local Plan: Part 2 (March 2019).

Development proposals must be compatible with the safe and efficient movement of the highway and therefore must ensure that:

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

Policy DMT 5 of the emerging Local Plan: Part 2 (March 2019).

- i. Development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network, including:*
- ii. the retention and, where appropriate, enhancement of any existing pedestrian and cycle routes;*
- iii. the provision of a high quality and safe public realm or interface with the public realm, which facilitates convenient and direct access to the site for pedestrian and cyclists;*
- iv. the provision of well signposted, attractive pedestrian and cycle routes separated from vehicular traffic where possible; and*
- v. the provision of cycle parking and changing facilities in accordance with Appendix A C, Table 1 or, in agreement with Council.*

Policy 6.12 of the London Plan (2016)

- A. The Mayor supports the need for limited improvements to London's road network, whether in improving or extending existing capacity, or providing new links, to address clearly identified significant strategic or local needs;**
- B. In assessing proposals for increasing road capacity, including new roads, the following criteria should be taken into account:**

- a. *the contribution to London's sustainable development and regeneration including improved connectivity*
 - b. *the extent of any additional traffic and any effects it may have on the locality, and the extent to which congestion is reduced*
 - c. *how net benefit to London's environment can be provided;*
 - d. *how conditions for pedestrians, cyclists, public transport users, freight and local residents can be improved*
- C. *how safety for all is improved.*

Proposals should show, overall, a net benefit across these criteria when taken as a whole. All proposals must show how any dis-benefits will be mitigated.

Chapter 9 of the NPPF (2019)'.

2.2.1 Chapter 9 of the NPPF considers the promotion of sustainable transport. Namely, this section of the document sets the following three tests in relation to transport and highways matters:

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

- ***Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;***
- ***Safe and suitable access to the site can be achieved for all users; and***
- ***Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."*** (ref: NPPF, Paragraph 108)

2.2.2 The NPPF further states that development: "should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." (ref: NPPF, Paragraph 109).

2.3 Response

2.3.1 *The Council maintains its position that a dedicated service and delivery arrangement is required in this case **to ensure the free flow of traffic** and **to safeguard pedestrians and cyclists making use of the Nestles Avenue sustainability corridor.***

2.3.2 The Hearing Statement explored the Policy grounds for refusal previously set out by LB Hillingdon and that information is reiterated in the following sections. The Hearing Statement also considered the arrangement of the loading bay and the effect of movements to and from that loading bay both on the free-flow of traffic on Nestles Avenue and on the proposed 'Nestle Avenue Sustainability Corridor'.

'Sustainability Corridor'

- 2.3.3 The proposed development offers up to LBH, a 10m stretch along the whole site frontage for creation of a new 'sustainability corridor'. General widths of that corridor (10m) were provided at a pre-application meeting held in August 2018. Accordingly, a circa 350sqm area of the site frontage was identified to be reserved for provision of a 'sustainability corridor'. The 10m width of the corridor is equivalent to 15% of the total site length (circa 75m).
- 2.3.4 The new corridor is proposed to route along the whole of Nestles Avenue and seeks to deliver a 4m wide 'parkland' space, 3m footway and 3m segregated cycle lane, all to be delivered within the site boundary, along with alterations to the current footway to deliver additional on-street parking bays¹.
- 2.3.5 There are no details of the design of the 'sustainability corridor' and it has no policy basis. Delivery of the corridor will require all land to facilitate it becoming available to LB Hillingdon, either through redevelopment proposals such as this where land is required to be offered up as part of the planning process, or in the future potentially via a CPO process. As such, it is reasonable to assume that the timeframe associated with delivery of the Sustainability Corridor is both in the longer-term and flexible in the context that its delivery is dependent on availability of land.
- 2.3.6 On this basis, there is a reasonable prospect the 'sustainability corridor' may not come forward at all, or at the very least not come forward in the short term (i.e. within the next 5 years). Therefore, thought must be given to the potential impact of the proposed development both in the short term (with and without the sustainability corridor in place) and in the longer term (with and without the sustainability corridor in place).
-

¹ There is no policy document or guidance available from the London Borough of Hillingdon as to the future form/alignment of the Nestles Avenue Sustainability Transport Corridor. The design presented within the planning application has been derived from drawings and submissions prepared for the Former Nestles Factory site adjacent to the development site (provided under planning ref: 1331/APP/2017/1883) – namely drawing 30710/5501/SK003 prepared by Peter Brett Associates which shows a bus turning head at the eastern end of Nestles Avenue – using this, a new i-Transport drawing, ITL14154-SK-007 Revision A, provided at Appendix A, has been prepared to better illustrate the proposed arrangement to the front of the site. This demonstrates how a loading bay could be accommodated whilst a footway and cycleway are also deliverable. The parkland space would be to the north of the footway/cycleway.

Loading Bay

- 2.3.7 A loading bay is considered a reasonable and acceptable means of servicing for a development such as this, as supported in the emerging London Plan (July 2019). Supporting text to Policy T7, Deliveries, Servicing and Construction reads;

'To reduce the pressure on London's streets, developments should provide for deliveries and servicing offstreet where possible, and through dedicated loading bays if not.'

'Where loading in the carriageway is unavoidable and the impacts can be made acceptable, it should be designed to minimise the impact on people walking or cycling and other road users.'

- 2.3.8 When considering the sites size and layout, together with the fact that there is a requirement to give up a 10m wide stretch of land across the site frontage to LB Hillingdon to facilitate delivery of the sustainability corridor, it must be recognised that the constraints that are experienced within the site for delivery and servicing are generated as a direct result of the reduction in site area of approximately 15% to facilitate the sustainability corridor. In short, giving over 15% of the site for this purpose results in insufficient space on site to enable service vehicles to access, turnaround and egress safely.
- 2.3.9 The proposed development hands over a 10m width of the site frontage to become a dedicated sustainability corridor. Therefore, in the future scenario the site will immediately front a stretch of land comprising a 4m wide 'parkland' space, a 3m dedicated footway and a 3m segregated cycle lane. Beyond this it is understood (refer to paragraph 1.3.4 of this note) that the existing footway on Nestles Avenue will be converted into formalised parking bays and then the carriageway of Nestles Avenue will pass.

Existing Scenario

- 2.3.10 At present deliveries are permitted to be made to the single yellow line along the site frontage on Nestles Avenue, which does not have any loading restrictions in place. Thus, at present a delivery vehicle can park on Nestles Avenue (with the vehicle parked within the carriageway and not adjacent to the carriageway) and goods can be transported from that vehicle across the footway and into the site. On this basis, at present LB Hillingdon accept a loading bay within the carriageway in this location and further accept that goods can be transported manually from a delivery vehicle (parking within the carriageway) across a footway creating no impediment to users of the highway or footway (i.e. no harm to drivers, cyclists or pedestrians).
- 2.3.11 If the development does not come forward the activity that occurs today will continue to take place and vehicles will continue to park within the carriageway.

Future Development Scenario – Without Sustainability Corridor

- 2.3.12 In the absence of a 'sustainability corridor' the proposed development would improve the existing site access from Nestles Avenue to modern design standards, making it suitable for use by vehicles accessing the on site parking bays. This is a benefit upon the existing situation.
- 2.3.13 For servicing, an off-carriageway loading bay is proposed (temporarily diverting the footway around the loading bay). This would mean that a delivery vehicle would park off-carriageway safely retaining the free-flow of traffic on Nestles Avenue. Goods would then be transported into the site manually from the vehicle across the footway as is the case at present. This would provide a net benefit in terms of safety and the free-flow of traffic on Nestles Avenue compared to the existing situation since it would remove the need for delivery vehicles to park within the carriageway as they do today.

Future Development Scenario – With Sustainability Corridor

- 2.3.14 Provision of a 'sustainability corridor' provides further justification to support the loading bay provision included for the proposed development. It is understood a 'sustainability corridor' would include a dedicated cycleway, separate footway and area of high-quality public realm. Therefore, a scenario which removes any need for larger vehicles (anything larger than a car) to cross the proposed footway/cycleway would reduce the potential for conflict between pedestrians and cyclists and delivery vehicles crossing the sustainability corridor which can only be a benefit in terms of highway safety. Drawing ITL14154-SK-007 Revision A, provided at Appendix A, provides the proposed layout for the scheme which includes a fully off-carriageway loading bay. i.e. a loading bay which does not obstruct the free flow of traffic on Nestles Avenue and that minimises conflict for vulnerable road users.
- 2.3.15 This approach is wholly in accordance with emerging policies DMT 2 and DMT 5 which seek safe and convenient access for pedestrians and cyclists via high quality public realm. The prevention of large vehicles crossing the 10m wide sustainability corridor significantly reduces the likelihood of conflict and prioritises the corridor for more vulnerable users.
- 2.3.16 In the absence of detailed design guidance for a 'sustainability corridor', reference has been made to The London Cycling Design Standards which provides good practice guidance as to good cycle track design and its interaction with loading activity.
- 2.3.17 At Section 4.2.6, the document recognises that;

'... continuous separation between cycles and motorised vehicles can be achieved through positioning the cycle lane/track between parking or loading bays and the kerb... (i.e. carriageway edge) ... When compared to marking lanes on the offside of parking, this method requires little additional space, is unlikely to lead to any overall loss of parking and represents a high level of service for cyclists in terms of safety and comfort.'

2.3.18 There are numerous locations across London where this exact arrangement is in use. An example of such an arrangement can be found on Blackfriars Road in Central London where a cycle superhighway is separated from the carriageway by loading bays and other on-street furniture (including a bus stop) as shown in Plate 3.1 below.

Plate 3.1 – Loading Bay separating Cycle Lane and Carriageway



Source: i-Transport – Taken on Blackfriars Road, London showing a loading bay separating a two-way cycle lane and footway from the carriageway.

2.3.19 In addition, section 4.3.10 of the design standards, notes operating hours of loading bays need to be determined with reference to anticipated demand and to the conditions that cyclists may experience outside of the times of operation and therefore what times loading activities are permitted. This arrangement would wholly be within the gift of LBH to determine given the bay would be located within the extent of public highway (and off-carriageway). Thus, loading could be restricted to avoid typical cycle flow peaks (likely to mirror typical highway network peaks of 7-10am and 4-7pm).

2.3.20 Section 4.2.6 of the document also makes reference to the type of goods likely to be delivered to/from the loading bay. With regards to the TA and DSP prepared in support of the application, it states a worst-case of 15 deliveries could be received per day. Two-thirds of these would be associated with

the residential element of the proposals and would likely consist of parcel deliveries and online grocery shopping deliveries/takeaway food deliveries (i.e. small items that would likely be carried or moved by small trolley to/from the site). The remaining deliveries would be associated with the commercial unit with daily visits consisting of general supply deliveries (i.e. stationary, etc- again items that would be carried or moved by trolley).

2.3.21 Whilst there may be occasional deliveries of bulky goods such as furniture, and occasional visits by engineers providing services and repairs (e.g. telecommunications, central heating, plumbing and so forth), as a BTR scheme, the site is highly likely to offer furnished apartments, typical at a number of BTR schemes in London, as well as its own facilities management team (i.e. residents will not have to arrange central heating servicing/plumbing, etc, individually).

2.3.22 The proposal is therefore considered safe because:

- The proposed layout has been developed in accordance with relevant guidance on the design of loading bays in combination with cycle routes in London;
- It is safer for delivery vehicles to temporarily stop in a dedicated on-street (fully-off carriageway) loading bay that does not obstruct the free-flow of traffic on Nestles Avenue;
- The proposed set up, by way of introducing a full off-carriageway bay is a betterment upon the existing situation whereby vehicles are permitted to park within the carriageway itself;
- The proposed arrangement does not obstruct the free-flow of vehicles on Nestles Avenue and leads to a betterment upon the existing scenario;
- The proposed set up allows the manual transfer of goods (primarily small items) from vehicle to site across the sustainability corridor, rather than large delivery vehicles crossing the 'sustainability corridor';
- The proposed set up reduces the potential for conflict between delivery vehicles and vulnerable road users.

2.4 Summary

2.4.1 LBH resolved to refuse the scheme in respect of highway safety on the grounds that the proposals compromise highway and pedestrian safety by virtue of the proposed servicing and delivery arrangements, giving rise to conditions prejudicial to the free flow of traffic that were considered to be detrimental to highway and pedestrian safety which, LBH suggest is contrary to the policies quoted at section 1.2 of this note.

2.4.2 Information set out within this note has shown the proposed loading bay would :

- Represent an improvement to safety and free flow of traffic when compared with the current servicing arrangements;
- Provide a practical service arrangement in accordance with the emerging London Plan hierarchy;
- Facilitate servicing and deliveries alongside a 'sustainability corridor' in accordance with TfL's design guidance; and
- Minimise conflict between vehicles, pedestrians and cyclists.

2.4.3 The proposal will improve the situation for all road users upon that which currently exists and will improve the situation further still both in the short-term before the sustainability corridor is introduced and the longer term once it comes forward.

2.4.4 There is no justification to support an objection on grounds that the proposal will obstruct highway safety and the free-flow of traffic on Nestles Avenue which would remain uninterrupted within provision of an off-carriageway loading bay. Furthermore, there is no justification to support an objection that the proposal will cause a negative effect on pedestrian safety since the proposal seeks to reduce conflict with vulnerable road users as far as possible and not increase it unnecessarily.

2.4.5 The proposals are therefore compliant with the following Policies:

- Policy AM7 (Hillingdon Unitary Development Plan Saved Policies (November 2012),
- Policy DMT 2 of the emerging Local Plan: Part 2 (March 2019),
- Policy DMT 5 of the emerging Local Plan: Part 2 (March 2019),
- Policy 6.12 of the London Plan (2016);
- Chapter 9 of the NPPF (2019); and
- Policy T7 of the emerging London Plan (July 2019).

2.4.6 The information set out within this note demonstrates that there is no credible argument to justify non-compliance with policy and similarly, there is no credible evidence that the Council's Reason for Refusal 7 would stand up to scrutiny.

APPENDIX G. TRICS OUTPUTS

Calculation Reference: AUDIT-236603-181116-1107

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 02 - EMPLOYMENT
 Category : C - INDUSTRIAL UNIT
 VEHICLES

Selected regions and areas:

01 GREATER LONDON
 HD HILLINGDON 2 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Secondary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Gross floor area
 Actual Range: 1080 to 3912 (units: sqm)
 Range Selected by User: 620 to 4000 (units: sqm)

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/10 to 05/12/12

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Wednesday 1 days
 Friday 1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count 2 days
 Directional ATC Count 0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre) 2

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Industrial Zone 2

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

B1 2 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 1 mile:

10,001 to 15,000 1 days
 15,001 to 20,000 1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Secondary Filtering selection (Cont.):

Population within 5 miles:

125,001 to 250,000 2 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

1.1 to 1.5 2 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

No 2 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present 1 days

1b Very poor 1 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	HD-02-C-01	TARMAC PRODUCTION	HILLINGDON
	PUMP LANE		
	HAYES		
	Suburban Area (PPS6 Out of Centre)		
	Industrial Zone		
	Total Gross floor area:	3912 sqm	
	Survey date: FRIDAY	11/05/12	Survey Type: MANUAL
2	HD-02-C-02	WINDOW PRODUCTION	HILLINGDON
	BETAM ROAD		
	HAYES		
	Suburban Area (PPS6 Out of Centre)		
	Industrial Zone		
	Total Gross floor area:	1080 sqm	
	Survey date: WEDNESDAY	05/12/12	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT
VEHICLES
Calculation factor: 100 sqm
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	2	2496	0.661	2	2496	0.561	2	2496	1.222
08:00 - 09:00	2	2496	0.441	2	2496	0.300	2	2496	0.741
09:00 - 10:00	2	2496	0.461	2	2496	0.441	2	2496	0.902
10:00 - 11:00	2	2496	0.541	2	2496	0.481	2	2496	1.022
11:00 - 12:00	2	2496	0.561	2	2496	0.581	2	2496	1.142
12:00 - 13:00	2	2496	0.481	2	2496	0.721	2	2496	1.202
13:00 - 14:00	2	2496	0.300	2	2496	0.421	2	2496	0.721
14:00 - 15:00	2	2496	0.461	2	2496	0.501	2	2496	0.962
15:00 - 16:00	2	2496	0.401	2	2496	0.461	2	2496	0.862
16:00 - 17:00	2	2496	0.321	2	2496	0.401	2	2496	0.722
17:00 - 18:00	2	2496	0.240	2	2496	0.401	2	2496	0.641
18:00 - 19:00	2	2496	0.120	2	2496	0.260	2	2496	0.380
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:	4.989			5.530			10.519		

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

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Parameter summary

Trip rate parameter range selected:	1080 - 3912 (units: sqm)
Survey date date range:	01/01/10 - 05/12/12
Number of weekdays (Monday-Friday):	2
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 02 - EMPLOYMENT/C - INDUSTRIAL UNIT
OGVS
Calculation factor: 100 sqm
BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	2	2496	0.220	2	2496	0.541	2	2496	0.761
08:00 - 09:00	2	2496	0.120	2	2496	0.240	2	2496	0.360
09:00 - 10:00	2	2496	0.300	2	2496	0.341	2	2496	0.641
10:00 - 11:00	2	2496	0.361	2	2496	0.341	2	2496	0.702
11:00 - 12:00	2	2496	0.361	2	2496	0.341	2	2496	0.702
12:00 - 13:00	2	2496	0.341	2	2496	0.401	2	2496	0.742
13:00 - 14:00	2	2496	0.180	2	2496	0.220	2	2496	0.400
14:00 - 15:00	2	2496	0.401	2	2496	0.341	2	2496	0.742
15:00 - 16:00	2	2496	0.300	2	2496	0.120	2	2496	0.420
16:00 - 17:00	2	2496	0.240	2	2496	0.080	2	2496	0.320
17:00 - 18:00	2	2496	0.080	2	2496	0.020	2	2496	0.100
18:00 - 19:00	2	2496	0.020	2	2496	0.060	2	2496	0.080
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:	2.924			3.046			5.970		

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

Calculation Reference: AUDIT-236603-200715-0740

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : C - FLATS PRIVATELY OWNED
 MULTI-MODAL VEHICLES

Selected regions and areas:

01	GREATER LONDON	
BE	BEXLEY	1 days
BT	BRENT	1 days
HG	HARINGEY	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings
 Actual Range: 30 to 170 (units:)
 Range Selected by User: 20 to 250 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/12 to 14/11/19

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Wednesday 3 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count 3 days
 Directional ATC Count 0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Edge of Town Centre	1
Suburban Area (PPS6 Out of Centre)	2

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Development Zone	1
Residential Zone	2

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

C3 3 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Secondary Filtering selection (Cont.):

Population within 1 mile:

25,001 to 50,000	2 days
50,001 to 100,000	1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

500,001 or More	3 days
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This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	3 days
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This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	1 days
No	2 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

3 Moderate	2 days
4 Good	1 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	BE-03-C-01 CROOK LOG BEXLEYHEATH	BLOCKS OF FLATS	BEXLEY
	Edge of Town Centre Residential Zone Total No of Dwellings:	79	
	Survey date: WEDNESDAY	19/09/18	Survey Type: MANUAL
2	BT-03-C-01 LAKESIDE DRIVE PARK ROYAL	BLOCKS OF FLATS	BRENT
	Suburban Area (PPS6 Out of Centre) Development Zone Total No of Dwellings:	170	
	Survey date: WEDNESDAY	28/09/16	Survey Type: MANUAL
3	HG-03-C-02 HIGH ROAD WOOD GREEN WOODSIDE PARK	BLOCK OF FLATS	HARINGEY
	Suburban Area (PPS6 Out of Centre) Residential Zone Total No of Dwellings:	30	
	Survey date: WEDNESDAY	01/10/14	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
IS-03-C-07	Inner London
KN-03-C-03	Inner London
SK-03-C-01	Inner London
SK-03-C-02	Inner London
WH-03-C-01	Inner London

TRIP RATE for Land Use 03 - RESIDENTIAL/C - FLATS PRIVATELY OWNED

MULTI-MODAL VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	93	0.068	3	93	0.082	3	93	0.150
08:00 - 09:00	3	93	0.025	3	93	0.061	3	93	0.086
09:00 - 10:00	3	93	0.032	3	93	0.050	3	93	0.082
10:00 - 11:00	3	93	0.086	3	93	0.097	3	93	0.183
11:00 - 12:00	3	93	0.054	3	93	0.082	3	93	0.136
12:00 - 13:00	3	93	0.036	3	93	0.050	3	93	0.086
13:00 - 14:00	3	93	0.079	3	93	0.104	3	93	0.183
14:00 - 15:00	3	93	0.032	3	93	0.025	3	93	0.057
15:00 - 16:00	3	93	0.057	3	93	0.050	3	93	0.107
16:00 - 17:00	3	93	0.068	3	93	0.065	3	93	0.133
17:00 - 18:00	3	93	0.111	3	93	0.118	3	93	0.229
18:00 - 19:00	3	93	0.086	3	93	0.072	3	93	0.158
19:00 - 20:00	2	125	0.124	2	125	0.068	2	125	0.192
20:00 - 21:00	2	125	0.104	2	125	0.068	2	125	0.172
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.962			0.992			1.954

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Parameter summary

Trip rate parameter range selected:	30 - 170 (units:)
Survey date range:	01/01/12 - 14/11/19
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	1
Surveys manually removed from selection:	5

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 03 - RESIDENTIAL/C - FLATS PRIVATELY OWNED
MULTI-MODAL VEHICLE OCCUPANTS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	93	0.097	3	93	0.100	3	93	0.197
08:00 - 09:00	3	93	0.032	3	93	0.086	3	93	0.118
09:00 - 10:00	3	93	0.039	3	93	0.054	3	93	0.093
10:00 - 11:00	3	93	0.115	3	93	0.108	3	93	0.223
11:00 - 12:00	3	93	0.086	3	93	0.108	3	93	0.194
12:00 - 13:00	3	93	0.047	3	93	0.061	3	93	0.108
13:00 - 14:00	3	93	0.104	3	93	0.143	3	93	0.247
14:00 - 15:00	3	93	0.032	3	93	0.025	3	93	0.057
15:00 - 16:00	3	93	0.086	3	93	0.068	3	93	0.154
16:00 - 17:00	3	93	0.086	3	93	0.079	3	93	0.165
17:00 - 18:00	3	93	0.133	3	93	0.165	3	93	0.298
18:00 - 19:00	3	93	0.111	3	93	0.100	3	93	0.211
19:00 - 20:00	2	125	0.153	2	125	0.088	2	125	0.241
20:00 - 21:00	2	125	0.133	2	125	0.080	2	125	0.213
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:		1.254			1.265				2.519

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/C - FLATS PRIVATELY OWNED

MULTI-MODAL TOTAL PEOPLE

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	93	0.129	3	93	0.373	3	93	0.502
08:00 - 09:00	3	93	0.093	3	93	0.491	3	93	0.584
09:00 - 10:00	3	93	0.133	3	93	0.179	3	93	0.312
10:00 - 11:00	3	93	0.165	3	93	0.258	3	93	0.423
11:00 - 12:00	3	93	0.161	3	93	0.190	3	93	0.351
12:00 - 13:00	3	93	0.133	3	93	0.104	3	93	0.237
13:00 - 14:00	3	93	0.179	3	93	0.237	3	93	0.416
14:00 - 15:00	3	93	0.143	3	93	0.090	3	93	0.233
15:00 - 16:00	3	93	0.265	3	93	0.194	3	93	0.459
16:00 - 17:00	3	93	0.229	3	93	0.154	3	93	0.383
17:00 - 18:00	3	93	0.287	3	93	0.251	3	93	0.538
18:00 - 19:00	3	93	0.348	3	93	0.194	3	93	0.542
19:00 - 20:00	2	125	0.442	2	125	0.177	2	125	0.619
20:00 - 21:00	2	125	0.265	2	125	0.153	2	125	0.418
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.972			3.045			6.017

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 03 - RESIDENTIAL/C - FLATS PRIVATELY OWNED

MULTI-MODAL Servicing Vehicles

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	93	0.011	3	93	0.007	3	93	0.018
08:00 - 09:00	3	93	0.000	3	93	0.000	3	93	0.000
09:00 - 10:00	3	93	0.007	3	93	0.007	3	93	0.014
10:00 - 11:00	3	93	0.036	3	93	0.036	3	93	0.072
11:00 - 12:00	3	93	0.014	3	93	0.011	3	93	0.025
12:00 - 13:00	3	93	0.011	3	93	0.018	3	93	0.029
13:00 - 14:00	3	93	0.018	3	93	0.014	3	93	0.032
14:00 - 15:00	3	93	0.007	3	93	0.007	3	93	0.014
15:00 - 16:00	3	93	0.004	3	93	0.000	3	93	0.004
16:00 - 17:00	3	93	0.007	3	93	0.011	3	93	0.018
17:00 - 18:00	3	93	0.004	3	93	0.007	3	93	0.011
18:00 - 19:00	3	93	0.004	3	93	0.004	3	93	0.008
19:00 - 20:00	2	125	0.000	2	125	0.000	2	125	0.000
20:00 - 21:00	2	125	0.000	2	125	0.000	2	125	0.000
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.123			0.122			0.245

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

