

TRANSPORT TECHNICAL NOTE

PROJECT	P2208.11TO 3 COLDHARBOUR LANE, HAYES, UB3 3EA
DATE	AUGUST 2022
REASON	FULL PLANNING
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1. INTRODUCTION

KRONEN has been instructed to prepare this Technical Note to support proposals for 1 to 3 Coldharbour Lane, Hayes, UB3 3EA (in the London Borough of Hillingdon).

2. SITE INFORMATION

The proposals site is a single storey building currently providing commercial floorspace to Cancer Research UK shop, Redpad estate agency and Microhard communication shop / services.

The proposal site has no vehicle access and no off-street parking.

Refer to Wighton Architects' existing plans.

3. SITE LOCATION AND PUBLIC TRANSPORT ACCESSIBILITY

The site is in Hayes town centre.

The site is within the designated Hayes Town Centre boundary (per p.165, Appendix D "Town Centre Maps" of "Local Plan Part 2 - Development Management Policies", LB Hillingdon, 2020); Hayes Town Centre is a "District Town Centre" and consequently the site is considered well located for access to amenities and services on foot.

The site has access to 11 × bus services as follows: 90, 140, 195, 278, 350, 696, 698, E6, H98, U4 and X140.

All bus service are accessible from "Hayes Town" bus stops on Station Road approximately 150m walk distance to the south of the site.

The site also has access to rail services from Hayes & Harlington Station. The station is approximately a 600m to 650m walk distance to the south of the site.

Elizabeth Line and Great Western Railway services are accessible from Hayes & Harlington Station.

Public transport accessibility in London is often quantified and measured using TfL's "Public Transport Accessibility Level" ("PTAL") model.

TfL's online GIS-based PTAL tool was used to research the site's PTAL score. The PTAL tool calculated the site and surroundings to have a 2021 Forecast PTAL score of 5. This PTAL score indicates a "Very Good" level of public transport service availability. Details of the PTAL calculation are provided in Enclosure 1.

The application site is considered to be in a central, accessible and sustainable location.

4. HIGHWAYS AND PARKING

The proposal site is adjacent the Coldharbour Lane / Pump Lane / Botwell Lane / East Avenue roundabout junction.

The site has pedestrian access from Coldharbour Lane (front) and East Avenue (rear).

The proposal site has no vehicle access and no off-street parking.

Coldharbour Lane appears to be a classified C-road and East Avenue appears to be an unclassified local access road.

The site / Coldharbour Lane / East Avenue do not appear to be within a LB Hillingdon Permit Controlled Parking Zone. Adjoining sections of Coldharbour Lane and East Avenue have a mixture of parking and goods vehicle loading bays including short stay pay bays Mondays to Saturdays 8am to 6.30pm and disabled bays.

Surrounding streets appear to be within the HY1 Permit CPZ which restricts parking Mondays to Saturdays 9am to 5pm.

5. RECENT PRE-APPLICATION

Pre-Application took place April to July 2021 regarding proposals to demolish the single storey building and replace it with a new car free building comprising $2 \times \text{new}$ commercial units at ground floor and $9 \times \text{new}$ apartments on upper floors (Pre-Application reference "55634/PRC/2021/98").

The main transport items from the response letter are considered to be:

- Acceptability of car free development with Section 106 Planning Obligation
- Consideration of disabled parking
- Cycle parking requirements

6. PROPOSAL

The proposal seeks the demolition of the single storey building and the construction of a new car free building comprising $2 \times \text{new}$ commercial units at ground floor and $9 \times \text{new}$ apartments on upper floors.

The 2 \times new commercial units at ground floor are both 69sqm in size.

The 9 \times new apartments include 4 \times 1-bedroom 2-person apartments, 4 \times 2-bedroom 4-person apartments and 1 \times 3-bedroom 6-person apartment.

The proposal does not create vehicle access or off-street parking.

The proposal includes integral cycle and refuse stores.

Refer to Wighton Architects' plans for the proposed layout and accommodation.

7. ANALYSIS

Given the scale and nature of the current proposal and the earlier pre-application response the main transport items for the proposal are considered to be: vehicle parking and cycle parking. These matters as well as servicing are assessed in turn below.

8. ANALYSIS - VEHICLE PARKING

Adopted local parking policy is set out in Policy DMT 6: Vehicle Parking of "Local Plan Part 2 - Development Management Policies" (LB Hillingdon, 2020).

Clause A of Policy DMT 6 refers to Appendix C (p.114):

"Policy DMT 6: Vehicle Parking

A) Development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity.

The Council may agree to vary these requirements when:

- i) the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and/or
- ii) a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations."

With regards to residential parking Appendix C "Parking Standards" Table 1 "Parking Standards" (b) "Parking requirements" provides a maximum standard for 1- and 2-bedroom flats of 1 to 1.5 spaces per apartment and for 3- and 4-bedroom or more bedroom flats of 2 spaces per apartment.

Regional Development Plan parking policy guidance is set out in "London Plan" (GLA, 2021) Policy T6 Car parking and T6.1 Residential Parking.

Overarching new London Plan seeks restrained off-street parking.

Policy T6 clauses A to D are considered most relevant (p.422).

"Policy T6 Car parking

A Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity.

B Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy.

C An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets.

D The maximum car parking standards set out in Policy T6 .1 Residential parking to Policy T6 .5 Non-residential disabled persons parking should be applied to development proposals and used to set local standards within Development Plans."

With regards to clause D and residential parking, Policy T6.1 Residential Parking clause A states (p.425):

"Policy T6.1 Residential parking

A New residential development should not exceed the maximum parking standards set out in Table 10.3. These standards are a hierarchy with the more restrictive standard applying when a site falls into more than one category."

With regards to clause A Table 10.3 states all sites with PTAL 5 to 6 should be car free.

Based on the above and as discussed in the Pre-Application response letter the principal of car free housing development is considered acceptable.

As requested in the Pre-Application response letter the applicant is willing to enter into a Section 106 Obligation to restrict eligibility of all occupiers to obtain parking permits in any Permit Controlled Parking Zones.

Based on context (within the designated Hayes District Town Centre, with access to 11 × bus services, rail services and comprehensive parking controls on surrounding streets) and policy the car free development is considered maximum standard policy compliant and acceptable.

With regards to London Plan policy, as the proposal is under $10 \times \text{dwellings}$, per clause G of Policy T6.1 Residential parking, a disabled parking bay is not required. It is noteworthy that there are $4 \times \text{on-street}$ disabled parking bays opposite the site on East Avenue.

With regards to commercial / retail parking London Plan Table 10.5 - Maximum retail parking standards states all sites in PTAL 5 to 6 areas should also be car free. Accordingly the nil parking provision for the $2 \times new$ 69sqm commercial units at ground floor is considered acceptable / policy compliant. The nil parking provision would also replicate the existing commercial provision at the existing site.

9. ANALYSIS - CYCLE PARKING

As shown on Wighton Architect's accompanying plans the proposal includes an integral cycle store at ground floor level providing 12 × cycle spaces for the proposed new apartments.

Local and regional Development Plan cycle parking policy and standards are referenced in the Pre-Application response letter.

"Local Plan Part 2 - Development Management Policies" (LB Hillingdon, 2020) Policy DMT 6: Vehicle Parking Clause A refers to Appendix C.

Appendix C: Parking Standards prescribed the following:

- "Flats
- (a) 1 per studio, 1 or 2 bed unit.
- (b) 2 per 3 or more bed unit."

Based on the proposed schedule (4×1 -bedroom 2-person flats, 4×2 -bedroom 4-person flats and 1×3 -bedroom 6-person flats) the standards would require a minimum of $10 \times \text{cycle parking spaces}$.

"London Plan" (GLA, 2021) cycle parking policy is Policy T5 Cycling.

Policy T5 refers to Table 10.2.

Table 10.2 standards for residential uses prescribes the following:

Long-stay cycle parking spaces (e.g. for residents or employees)

- 1 space per studio or 1 person 1 bedroom dwelling
- 1.5 spaces per 2 person 1 bedroom dwelling
- 2 spaces per all other dwellings

Short-stay cycle parking spaces (e.g. for visitors or customers)

- 5 to 40 dwellings: 2 spaces
- Thereafter: 1 space per 40 dwellings

Based on the proposed schedule (4×1 -bedroom 2-person flats, 4×2 -bedroom 4-person flats and 1×3 -bedroom 6-person flats) the standards would require a minimum of 16×10 -bedroom 2 × short stay cycle parking spaces.

The Pre-Application response letter highlights the lower local standard and based on the earlier Pre-Application proposed schedule advises 11 × cycle parking spaces should be provided.

The proposal provides cycle parking in excess of the local minimum standards.

Proposal drawings indicate that the two-tier system proposed is the "FalcoLevel-Eco" system ([Online] < https://www.falco.co.uk/products/cycle-parking/compact-cycle-parking/falcolevel-eco-two-tier-cycle-parking.html >). This system includes gas struts to aide parking on both tiers. Per "London Cycling Design Standards" (TfL, 2014) requirements the store has a headroom clearance of 2.7m.

With regards to short-stay cycle parking there are $4 \times \text{Sheffield stands} / 8 \times \text{short stay cycle parking spaces}$ opposite the site on Coldharbour Lane.

With regards to the $2 \times \text{new } 69\text{sqm}$ commercial units at ground floor, Table 10.2 has a starting threshold of 100sqm for cycle parking and the nil provision is therefore considered acceptable. The nil parking provision would also replicate the existing commercial provision at the existing site.

The proposal provides cycle parking in accordance with the local Development Plan policy and standards.

10. ANALYSIS -SERVICING

The existing site does not appear to provide refuse stores with commercial bins stored on the public footway on East Avenue.

The proposal includes $3 \times \text{integral refuse stores}$; $1 \times \text{store for each commercial unit and } 1 \times \text{communal store for the apartments with collection from East Avenue.}$

The proposed segregated refuse stores appear acceptable and would be an improvement compared with the existing arrangements.

Other commercial and domestic servicing / deliveries / loading could take from on-street parking bays on East Avenue or goods vehicle loading only bays on Coldharbour Lane (the nearest bay is approximately 60m walk distance from the site).

Servicing arrangements are considered acceptable.

11. ANALYSIS - CONCLUSIONS

Based on the above the proposal's vehicle parking, cycle parking and layout arrangements are considered acceptable.

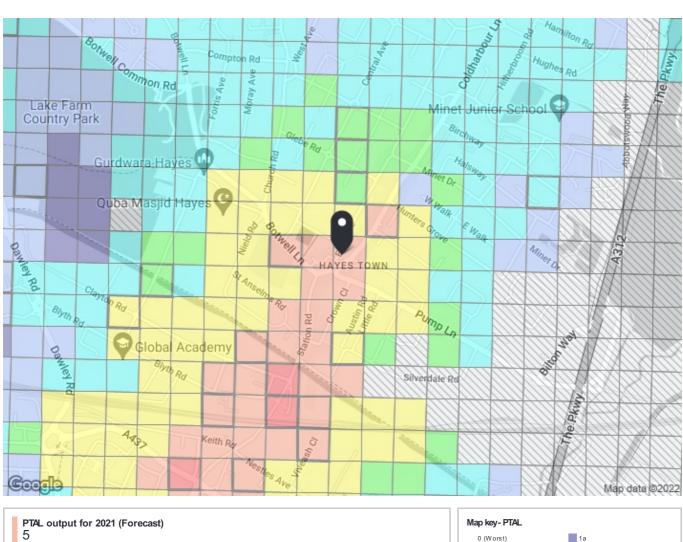
With regards to transport impacts Paragraph 111 of the "National Planning Policy Framework" includes guidance of only preventing or refusing development on transport grounds where "there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe" (Ministry of Housing, Communities & Local Government, 2021). The proposals' impact is not considered severe in this context and is therefore considered not objectionable in a planning context.

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ENCLOSURES









Mode	Stop	Route	Distance (metres)	Frequency(vph)	Walk Time (mins)	SWT (mins)	TAT (mins)	EDF	Weight	Al
Bus	HAYES COLDHARBOUR LANE	E6	24.82	6.21	0.31	6.83	7.14	4.2	0.5	2.1
Bus	HAYES COLDHARBOUR LANE	90	24.82	6.21	0.31	6.83	7.14	4.2	0.5	2.1
Bus	HAYES COLDHARBOUR LANE	140	24.82	8.8	0.31	5.41	5.72	5.24	1	5.24
Bus	HAYES BOTWELL LANE	U5	169.49	5.18	2.12	7.8	9.92	3.03	0.5	1.51
Bus	HAYES BOTWELL LANE	H98	169.49	7.76	2.12	5.86	7.98	3.76	0.5	1.88
Bus	HAYES BOTWELL LANE	195	169.49	5.18	2.12	7.8	9.92	3.03	0.5	1.51
Bus	HAYES BOTWELL LANE	U4	169.49	7.76	2.12	5.86	7.98	3.76	0.5	1.88
Bus	HAYES BLYTH ROAD	350	591.15	5.18	7.39	7.8	15.19	1.98	0.5	0.99
Rail	Hayes & Harlington	'ABBEYW-HTRW4'	634.91	3.33	7.94	9.76	17.7	1.7	1	1.7
Rail	Hayes & Harlington	'SHENFLD-RDNGSTN'	634.91	2	7.94	15.75	23.69	1.27	0.5	0.63
Rail	Hayes & Harlington	'SHENFLD-MDNHEAD'	634.91	1.33	7.94	23.31	31.24	0.96	0.5	0.48
Rail	Hayes & Harlington	'HTRW4-SHENFLD'	634.91	1	7.94	30.75	38.69	0.78	0.5	0.39
Rail	Hayes & Harlington	'ABBEYW-MDNHEAD'	634.91	0.67	7.94	45.53	53.46	0.56	0.5	0.28
Rail	Hayes & Harlington	'WDRAYTN-ABBEYW'	634.91	1.33	7.94	23.31	31.24	0.96	0.5	0.48
Rail	Hayes & Harlington	'WDRAYTN-SHENFLD'	634.91	0.67	7.94	45.53	53.46	0.56	0.5	0.28
Rail	Hayes & Harlington	'RDNGSTN-ABBEYW'	634.91	0.33	7.94	91.66	99.6	0.3	0.5	0.15
Rail	Hayes & Harlington	'HTRW4-WWARSL'	634.91	0.33	7.94	91.66	99.6	0.3	0.5	0.15
Rail	Hayes & Harlington	'RDNGSTN-PADTON 2P11 '	634.91	2	7.94	15.75	23.69	1.27	0.5	0.63
Rail	Hayes & Harlington	'PADTON-RDNGSTN 2R13'	634.91	2	7.94	15.75	23.69	1.27	0.5	0.63