

Planning Application 55857/APP/2017/2608
389 Harlington Road, Proposed Residential Development
(Amended Proposal for 5 Flats)

Response to Comments by L B Hillingdon Highways

Introduction

1. Following submission of a planning application for development of 6 flats at 389 Harlington Road, Uxbridge, the Highway Authority recommended that the application be refused due to *'the lack of off-street car parking'*.
2. The proposal for 6 two-bedroom flats included the provision of 6 parking spaces on-site allowing for 1 space per dwelling. The scheme has now been amended to provide 5 two-bedroom flats with 6 parking spaces, including one suitable for a disabled user.
3. The Highway Authority comments indicate that the parking standards require 9 spaces to be provided by reason of the local level of public transport access. That level of provision reflects the maximum allowed under the adopted standards set out in Annex 1 of the Hillingdon UDP adopted in 1998 under saved Policy AM14. It is clear from Note 3 of the Annex that most development would normally be expected to require fewer parking spaces.
4. This expectation is reflected in the draft Development Management Policies Document where Policy DMT 6 sets out the Council's current approach to parking at new developments. It advises that developments must comply with the parking standards set out at Appendix C Table 1 *'in order to facilitate sustainable development and address issues relating to congestion and amenity'*.
5. Policy DMT 6 allows variations to the requirements of the parking standards when: *'i) the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity'*.
6. The parking standard for 1 and 2 bedroom flats is 1.5 to 1 spaces per unit and this is indicated to be a maximum requirement. A note to the standard for flats states that visitor's car parking must also be accommodated on-site. The maximum standard is now expressed as a range from 1 to 1.5 spaces per dwelling.



7. The revised proposed provision of 1.2 spaces per dwelling accords with the stated maximum provision of 1.5 – 1 spaces per unit and does not conflict with the requirements of the policy. It is considered that this level of parking is appropriate.

Consideration of Potential Car Ownership

8. To support the proposed level of provision, Census 2011 data has been used to provide an estimate of the number of cars likely to be owned by the future residents of the development.

9. Census 2011 Table KS404EW provides detailed information on the level of car ownership down to Output Area (OA) level which include between 100 and 200 dwellings. The data provided includes the numbers of car owned in categories from 0 to 4 or more and the total number of cars owned. This allows an exact average to be calculated. However it includes dwellings of all types and so is not the best data for considering development only of flats.

10. Census 2011 Table LC4415EW provides information on the level of car ownership by type of dwelling but to a lower level of detail and without a total count of cars owned. However it is possible to calculate a value for the number of cars owned by households owning at least 2 cars using KS404EW and to apply this to LS4415EW to derive an approximation for the average cars owned by households in flats.

11. Table 1 attached to this note shows the results of the analysis of Table KS404EW for seven OAs that include the site location and adjacent areas. That Census data provides the numbers of household owning different numbers of cars and the total number of cars owned. The average number of cars owned by all households and for households owning at least 2 cars have been calculated for each of these OAs. The averages for all households range from 0.821 cars to 1.416 cars and the 2+ cars averages range from 2.242 to 2.342. These values include households in Houses as well as flats.

12. Tables 2 to 4 attached to this note show the results of the analysis of Table LC4415EW for the same seven OAs. This shows car ownership by type of household for a smaller number of categories and with no total number of cars owned in the OA. The percentage of flats in each OA has been calculated to identify OAs which have significant numbers of flats.

13. The total number of cars owned by households living in flats has been calculated using the 2+ cars averages for each OA. This then allows the calculation of an approximate average number of cars owned for flats.



14. These approximations are slightly higher than actual values due to the use of the 2+ averages calculated using data for all housing types. The approximate averages range from 0.375 to 1.365 cars.

15. A more accurate result will be obtained from an OA where there is a high percentage of flats, which provides a better approximation of the average for 2+ car households, and where there is a higher number of flats. Output Area EA0012000 has both the highest percentage of flats at about 56% and the highest number of flats (59), and the average of 0.864 for this OA will be the best approximation.

16. Applying that average value to the proposed 5 flats indicates that the residents might own 4.32 cars. That number would be accommodated by the 6 parking spaces proposed for the development. These spaces will be unallocated to ensure best use of the spaces.

17. The calculation set out above demonstrates that the development would have sufficient on-site parking to accommodate the anticipated car ownership of the residents.

Access to Public Transport

18. The Highway Authority has referred to the level of access to public transport as being poor due to the calculated PTAL level of 2 and suggests that there will be a very strong reliance on private car trips to and from the site. The calculation of the PTAL level for the site is not disputed. However reference merely to the calculated level does not necessarily reflect the ease of access public transport that can provide for most travel needs. The PTAL level calculation takes no account of the attractiveness of the destinations served both along the routes and at the termini, or the fact that, at many locations, several routes may serve the same destinations, providing high frequencies to limited choice compared to locations served by more varied routes.

19. In this case the proposed development site is very close to bus stops serving both directions of travel with the nearest stop just 52m away. There is a signal controlled pedestrian crossing giving easy access to the westbound stop on the south side of Harlington Road. The proximity of the stops makes it very convenient indeed to access these bus services. The two bus routes using Harlington Road are high frequency with Route U4 providing buses every 8 minutes in each direction and Route A10 providing buses every 15 minutes.



20. Route U4 provides a direct service to Uxbridge town centre with a journey time of less than 15 minutes. The town centre provides a very wide range of services and facilities that would meet most every day needs for residents. The frequency of service and the journey time would be very competitive to journeys by car especially when the time and cost of parking is taken into account.

21. Route U4 also provides direct access with a journey time of 6 minutes to Hillingdon Hospital which is a major employment location and hospital workers would no doubt find the proposed flats as attractive accommodation given this proximity.

22. In the opposite direction Route U4 travels to Prologis Park via Harlington which are also major employment centres and provide a further broad range of facilities.

23. In addition Route A10 both provides extra journeys to Uxbridge and a service to Heathrow Airport with a journey time of 14 minutes.

24. Considered in detail, the public transport services provide very convenient, high frequency, quick journeys to destinations that provide for all every day needs and give access to an extremely wide choice of employment opportunities.

Policy Considerations

25. In addition to Policy DMT 6, the text of the Development Management Policies provided guidance on the reasons for and the application of the policy. In particular, it refers to the London Plan's advice to local authorities to take into consideration making the most effective use of scarce housing land. A requirement for the development to provide 1.5 parking space per unit, as suggested by the Highway Authority would limit development to 4 flats and result in a less efficient use of this previously developed site..

26. In addition the London Plan advises that excessive car parking provision can undermine cycling walking and public transport use. TfL research shows that reduced residential parking levels can influence the level of car ownership.

27. The proposed parking provision is consistent with the adopted and emerging parking policies which both allow for provision below the maximum level allowed. The test of the impact of such variance set out in the Policy needs to be considered in light of the provisions of National Planning Policy Framework paragraph 32 which advises that development should only be refused on transport grounds if the residual impact would be severe.



Summary and Conclusions

28. The proposed development of 5 two-bedroom flats includes provision of 6 car parking spaces. Analysis of Census 2011 data shows that the likely expected level of car ownership for flats in this area would be just over 4 cars which would be accommodated by the proposed 6 parking spaces.

29. Although the PTAL level is calculated to be 2, two bus services operate from bus stops about 50m from the site and provide very convenient, frequent services with short journey times to two town centres, Hillingdon Hospital, Prologis Park and Heathrow. The bus services give easy access to a very broad range of every day facilities and a wide choice of employment.

30. The proposed development complies with the parking standards of between 1.5 to 1 spaces per dwelling. A requirement for provision of the maximum level of parking allowed by the parking standards would lead to a reduced scale of development and a less efficient use of scarce housing land, contrary to London Plan advice.

31. The NPPF advises that development should only be refused where the residual cumulative impacts of development are severe.

Development Transport Planning Ltd
24th October 2017



Table 1**KS404EW - Car or van availability**

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population All households; All cars or vans
 units Households
 date 2011
 rural urban Total

Cars	All categories: Car or van availability	No cars or vans in household	1 car or van in household	2 cars or vans in household	3 cars or vans in household	4 or more cars or vans in household	sum of all cars or vans in the area	Average	Average 2+
E00011984	129	25	53	40	10	1	168	1.302	2.255
E00011989	117	25	59	27	4	2	133	1.137	2.242
E00011990	110	20	53	28	6	3	139	1.264	2.324
E00011992	137	23	52	46	14	2	194	1.416	2.290
E00011997	122	20	56	35	9	2	161	1.320	2.283
E00011998	121	27	56	26	11	1	145	1.198	2.342
E00012000	106	43	45	14	3	1	87	0.821	2.333
Total	842	183	374	216	57	12	1,027	1.220	2.291

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.

Table 2**LC4415EW - Accommodation type by car or van availability by number of usual residents aged 17 or over in household**

ONS Crown Copyright Reserved [from Nomis on 15 September 2017]

population All households

units Persons

date 2011

accommodation typ All categories: Accommodation type

no of usual reside All categories: Number of usual residents aged 17 or over in household

2011 output area	All categories: Car or van availability	No cars or vans in household	1 car or van in household	2 or more cars or vans in household	Percentage Flats
E00011984	129	25	53	51	17.8%
E00011989	117	25	59	33	7.7%
E00011990	110	20	53	37	1.8%
E00011992	137	23	52	62	9.5%
E00011997	122	20	56	46	1.6%
E00011998	121	27	56	38	6.6%
E00012000	106	43	45	18	55.7%

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly

Table 3**LC4415EW - Accommodation type by car or van availability by number of usual residents aged 17 or over in household**

ONS Crown Copyright Reserved [from Nomis on 15 September 2017]

population All households

units Persons

date 2011

accommodation typ Whole house or bungalow

no of usual reside All categories: Number of usual residents aged 17 or over in household

2011 output area	All categories: Car or van availability	No cars or vans in household	1 car or van in household	2 or more cars or vans in household
E00011984	106	20	41	45
E00011989	108	22	54	32
E00011990	108	19	53	36
E00011992	124	20	48	56
E00011997	120	19	55	46
E00011998	113	22	53	38
E00012000	47	19	22	6

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly

Table 4**LC4415EW - Accommodation type by car or van availability by number of usual residents aged 17 or over in household**

ONS Crown Copyright Reserved [from Nomis on 15 September 2017]

population All households
 units Persons
 date 2011
 accomodation typ Flat, maisonette, apartment, caravan or other mobile or temporary structure
 no of usual reside All categories: Number of usual residents aged 17 or over in household

2011 output area	All categories: Car or van availability	No cars or vans in household	1 car or van in household	2 or more cars or vans in household	Average 2+	Total Cars	Average	Percentage 2+ Cars	Percentage Flats
E00011984	23	5	12	6	2.255	26	1.110	26.09%	17.8%
E00011989	9	3	5	1	2.242	7	0.805	11.11%	7.7%
E00011990	2	1	0	1	2.324	2	1.162	50.00%	1.8%
E00011992	13	3	4	6	2.290	18	1.365	46.15%	9.5%
E00011997	2	1	1	0	2.283	1	0.500	0.00%	1.6%
E00011998	8	5	3	0	2.342	3	0.375	0.00%	6.6%
E00012000	59	24	23	12	2.333	51	0.864	20.34%	55.7%
Total	116	42	48	26	2.291	108	0.927	22.41%	

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly