5 Pembroke Way UB3 1PZ

Conversion of dwelling into 1 x 2 bedroom flat and 1 x 3 bedroom flat.

Transport Statement

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Addendum (October 2016)

This parking study was conducted in April 2016, as instructed by WEA planning, in respect of the conversion of a 4 bedroom semi-detached house into 2x 2 bedroom apartments.

After further clarification from the client, it is noted that one of the apartments has an additional guest bedroom, which should have meant it being treated as a three-bedroom apartment.

However, the material planning considerations have not changed, because the guidance for car parking is based on the apartment itself, not the number of bedrooms.

Even if this bedroom was occupied by a car owning adult there would still be no significant material impact on the local community, because the original parking study **showed that there were ample parking spaces** available in this locality, especially for overnight parking.

It has been claimed, both with the 2009 planning application and with the current application, that the fact that this property is located in between two streets means that it creates a parking problem, when the exact opposite is true.

Whereas a property directly fronting the street would be required to have a total of 800 m of parking frontage surveyed (this is based on multiplying 200 m in each direction by 2 sides of the street), the total street frontage considered for this application is actually closer to 1600 m, because the area for parking consideration forms an "H", rather than a single line.

In order for it to be a legitimate planning concern, parking stress needs to be demonstrated on all 4 arms of the "H", when in fact, parking stress is shown to be just below 80% on 3 of these arms, whilst on the eastern side of the south eastern arm of this H, there is no overnight parking at all. It is also clear that this parking is available in abundance and well within the 200m survey limits.

Concerns over the bus stops are also not material, because the survey showed there to be no evidence of parking in either of the bus stops at the end of Pembroke Way. This is consistent with the fact that bus stop parking is well enforced across London.

Therefore, there simply cannot be any material grounds on highways concerns to refuse this application.

Introduction

The applicant at No. 5 Pembroke Way wishes to convert his four bedroom semi-detached house into 1x 2 bedroom flat and 1 x 3 bedroom flat.

This Transport Statement provides an assessment of the surrounding transport infrastructure, and includes considerations such as active travel (walking and cycling) and public transport, together with driving conditions and the availability of parking.

This document sets out the reasons why the Applicant believes that Highways concerns are not *materially* significant, whilst also considering more recent changes in Highways related policy since 2009 (the year of the Inspector's decision).

Hillingdon Parking Policy

Through substituting an existing four bedroom dwelling house for apartments totalling 5 bedroom, there is a net gain of one bedroom, but **no net gain** in total habitable space.

This semi-detached house was built at the same time as the rest of the locality, with a side extension added later, resulting in the property having extant planning permission for continued usage as a large house with four bedrooms.

The question is therefore not one of property size, but whether or not conversion to two smaller flats would require any additional parking space, based on likely usage.

This is predicated on the broad assumption that:

- A four bedroom house is more likely to be used by a family with children, thus only the parents are likely to be able to drive. In this scenario, there is a strong possibility that both adults might have their own car, although single car families are also extremely common across much of London[1].
    - Such an arrangement could also include young adults who are either learning to drive or who have recently passed their test.
- A two or three bedroom apartment is more likely to be occupied by younger adults or couples, including transient workers.
    - Individuals or couples without a family are less likely to need to own a car.
    - The locality provides a wide range of employment opportunities, including locations where work is inherently offered on a temporary or contract basis, especially around Heathrow Airport.

[1] Transport for London data on car ownership - http://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf.
Hillingdon census data - https://www.hillingdon.gov.uk/article/7629/Facts-and-statistics-about-the-London-Borough-of-Hillingdon

Parking Guidance

London Borough of Hillingdon Policy[2] offers the following guidance, noting that the car parking requirements are *maximums*, and the cycle parking requirements are *minimums*.

Residential	Dwelling type	Car parking	Cycle parking
C3	a. Flats and houses without individual curtilages with communal parking in garages or open car parking areas	1.5 spaces per dwelling. (3,4)[3]	Dwellings with 1-2 bedroom: 1 space. Dwellings with 2+ bedrooms: 2 spaces.
	b. Dwellings with curtilage parking	2 spaces per dwelling. (3,4)	1-2 bedroom dwellings: 1 space 2+ bedroom dwellings: 2 spaces

If the property was constructed today as a new build with parking ***within*** the curtilage, the *maximum* allowance would be:

- Single house - 2 spaces;
- Two flats - 1.5 spaces each = 3 spaces.

Difference = 1 space

If the property was constructed today as a new build with parking ***outside*** the curtilage, the *maximum* allowance would be:

- Single house - 1.5 spaces.
- Two flats - 1.5 spaces each = 3 spaces.

Difference = 1.5 spaces

It is noted that all parking guidelines are *maximum* limits

In the case of Pembroke Way, there is no question of providing parking within the curtilage of the property, and this would suggest that the guidelines of **Policy C3b** are a closer match to the scenario.

However, it is also somewhat inconsistent that under these requirements, a large house with four bedrooms would have the same parking needs as just one small apartment with two bedrooms.

[2] London Borough of Hillingdon Adopted Unitary Development Plan: Further Alterations to the Parking Policies and Standards (Second Deposit Draft) December 2001.

[3] Hillingdon Parking Note (3) Precise level of provision may be dependent on household and housing type and location. Provision above the maximum level will only be considered in exceptional circumstances and where the development is related to measures to improve public transport or manage the supply of on-street parking.

Even if this premise were accepted at face value, "need" can still only correspond to a *maximum* parking requirement, not a minimum. To create a case based on Policy **C3b** is also to argue for *half* a parking space, a number which has to be rounded up or down in this context, given that it cannot be averaged out, as it would be over a larger development.

Since parking limits are maximums, the rounding could only logically go down, not up.

It is therefore suggested that the guidance in C3a is a closer match to the likely scenario, i.e. that the net gain in parking requirement for this development **is likely to be just one space**.

Only the net gain can be considered as a material planning concern, since the existing property already has extant permission.

Whilst this document seeks to create a robust case based around one additional parking space having a statistically insignificant impact on the locality, the same argument would apply for a second parking space.

Cycle Parking

Minimum cycle parking requirements for two flats would be 1 cycle space per 1-2 bedroom flat, and two spaces per 2+ bedroom plat, totalling 3-4 spaces.

Unlike the car parking spaces, it would be reasonable to expect cycle storage to be within the curtilage of the property, especially as there is no history of on-street cycle parking storage being provided in this locality.

On Site Cycle storage

- It is suggested that a condition could be attached requiring a separate shed to be constructed for cycle storage, with a total of 4 spaces.

Parking as Grounds for Refusal?

The fundamental tenet of the NPPF is the

> *"Presumption in favour of sustainable development"*

Whilst it is clear that this development proposal has *already* been shown to be sustainable in terms of all other Hillingdon planning policies, the previous refusal on Highways grounds was made because of concerns over the increase in, and the location of parking.

However, the appeal decision by the Planning Inspectorate failed to make any mention of the extant planning permission for No. 5 Pembroke Way as a dwelling house, and the requirement for on-street parking that comes with this property, whilst also failing to suggest possible conditions which would have ameliorated those concerns.

This document sets out the reasons why the applicant believes the application should be accepted, given the substantial volume of additional information provided since the 2009 refusal.

Fundamentally, given the *presumption* in favour of sustainable development, following a review of the transport statement, it would be up to the London Borough of Hillingdon to demonstrate:

1. That the new application would provide a level of parking stress **over and above** that which would be permitted by the extant permission for a 4 bedroom dwelling house.
2. That there is an existing significant parking problem in the area.
3. That the parking stress would constitute a clear and material danger.

Looking north on Stockton Drive (in front of #31) from just above Pembroke Way. Note the long expanse of parking adjacent to the hedge.

No Right to Park?

The previous planning refusal on Highways safety grounds claimed that there is "no right to park" on the street, drawing heavily on the fact that the house is set back from the highway as grounds for refusal.

This is not consistent with the fact that there are many other houses in the neighbourhood with this characteristic, including many of the properties which are on Stockton Drive, but set back from the street.

Houses set back from the highway at the northern end of Stockton Drive (#5-11, looking north) with manicured gardens and mature trees.

Why can't I park in front of my house?

One of the most common questions asked by residents of busy urban neighbourhoods is "why can't I park outside my house"? However, this is not ultimately a question about the *right* to park at all, but simply the common misconception that a property owner has the right to park *directly* outside their house. This question is ultimately one of title deeds - the home owner with driveway parking owns the space on which they park, and as such can also expect their access to be protected, in accordance with the Highway Code.

It is often pointed out that the act of driving itself isn't a right, as it is only possible on licence and subject to passing an initial test. However, the Highways Act 1980 ***does*** make it a right to park in a spot that isn't already parked in, provided that a number of exceptions don't apply:

1. The space is on the public highway, and not private property.
2. The space is safe to park in, and specifically is not on a sharp bend or within 10m of a junction.
3. The space does not block any access to driveways, cycle paths or dropped kerbs.
4. The space is not restricted by markings such as double yellow lines, school zig-zags (during times of operation), and is not a bus stop, taxi rank, disabled space or other such restricted space.
5. The space is not in a controlled or restricted parking zone.

Additionally, the right to park is naturally subject to the vehicle itself being appropriately taxed and insured, with SORN exemptions not applying on the public highway.

It is clear that the *vast majority* of the area surrounding 5 Pembroke Way is not subject to any of the points above, and therefore residents and their guests can park freely without limitation. There is no RPZ.

External Parking Stressors

Although Pembroke Way opens onto two streets which are very much residential in character, the transport survey identified a number of potential causes of parking stress, and these are listed below in order of the extent to which could be initially perceived as causing potential parking problems.

Note that these stressors are considered external inasmuch as the parking spaces are likely to be used by drivers who do not live on the streets concerned. The potential factors relating to residents' parking are addressed later in this document.

Pinkwell School and Harlington Library

Pinkwell School is a very large primary school, with capacity for 812 pupils, more than double the London average[4].

It is acknowledged that the school generates a large amount of traffic in accordance with these pupil numbers, especially during the morning drop off and the afternoon pick up periods. The transport survey deliberately selected to visit the area just before the afternoon pick up period in order to ascertain the extent of parking in and around the school area.

Whilst the school itself is well outside the 200m walking distance that is standard for residential parking surveys, there is only very limited parking on the street immediately adjacent to the school, and the study anticipated that there would be overflow parking into the southern portion of Carnarvon Drive. The survey was conducted on foot, approaching from Hayes and Harlington railway station via local roads, such that the entire overflow area around the school was informally surveyed, in addition to a more detailed study of the southern part of Carnarvon Drive, which is within the 200m limits.

It was noted that there was no evidence of overflowing parking in either direction from the T-junction where Mildred Avenue meets Pinkwell Lane. It was apparent that these two streets were less attractive for parents to wait in.

Pedestrian Protection Measures

As is standard policy for schools in England, the immediate area adjacent to the school and related properties is marked with a long sequence of no less than seven zigzag lines, and this pattern is also merged into two zebra crossings and two bus stops on the southern side of Pinkwell Lane.

This creates an unbroken distance of some 430m in which parking is completely prohibited during the school pick upand drop off period.

[4] Scholl - 399 http://www.learningplusuk.org/blog/2015-07-10/primary-school-sizes-2007-2014

Pinkwell School Parking

On the opposite (northern) side of the road, parking is permitted outside the areas designated by the zebra crossings and bus stops, although a number of properties front onto the street at this location. As the pavement is wide at this point, parking has been permitted to the west of the properties, using a "half-on-half-off" arrangement, generally adjacent to the park. This parking strip is approximately 130m long, enabling around 20 cars to be parked. This is not sufficient in its own right to manage the school pick up period, hence there is a substantial overflow into Carnarvon Drive.

These parking spaces were observed to be 100% full during the site visit. although there was some turnover in space usage, as spaces were seen to be taken again soon after being vacated. On returning to the area later in the evening, this entire strip of parking space was observed to be empty.

There is clearly heavy parking demand around Pinkwell Primary School during the pick up period, although this is very much localised.

A long line of parked cars opposite Pinkwell Primary School. Note that the entire length of the zigzag markings is kept clear.

At the junction of Pinkwell Lane and Carnarvon Drive, it was noted that parents had a strong preference for parking alongside Pinkwell Park, where a long strip of parking was available without being interrupted by driveways. On the opposite side, there were still some parents parking, although in a more dispersed pattern, with a small number of spaces being available, even after accounting for driveways.

It was apparent that to the west of this T-junction, there weren't more than one or two parents picking up children. It was also apparent that the strip of cars parking for the school pick up period on Carnarvon Drive stopped short of the bus stop adjacent to the entrance to Pinkwell Park. There was no apparent parent parking to the north of the bus stop.

As with all observations made during this study, there will always be daily fluctuations over and above what might be observed through repeated study. Residents will no doubt report of parents picking up school children in other areas, just as they will report of events or times when people parked in the area for other reasons. However the purpose of the objective study is to determine whether or not parking is a measurable problem, and this survey shows that it is not.

Harlington Library and Adult Education Centre

Free parking is available onsite for visitors via a car park entrance in Dudley Close[5]. This location is also situated even further outside the study zone when compared with the school, and is thus not considered to be a significant factor.

Bourne Circus

Bourne Circus, at the junction between Bourne Avenue and Carnarvon Drive is arranged in a diamond configuration, with flanks of car parking on the southern two diagonal edges, as well as on the street itself. During the observation period, there was just one car parked on the western side, whereas the eastern side was reasonably busy, but far from full.

- One car was observed to be parking very briefly on the pavement, with the driver remaining in the car. The car moved on around two minutes later.

It is well known that this sort of arcade can have a severe car parking problem if it has particular shops that are attracting drivers from a wide area, or if it contains restaurants with a long dwell time. However, neither of these is the case here – four of the stores at this location are convenience stores with a very fast customer turnaround, whereas three other businesses were takeaway outlets. One unit was a plumbing outlet.

The three remaining businesses comprised two hairdressers and a beauty salon - each with moderate dwell time for parked cars. The vast majority of customers in this location are likely to walk, leaving plenty of space for those who chose to drive. Given that this location is comfortably outside the survey area, it would only warrant further attention if there was a reason to believe that the shops would be so busy that they would cause *overflow* parking into the study area, and this is clearly not the case.

Ample space around Bourne Circus

Music Box public house

Music Box public house

In the north-east corner of the Bourne Avenue / Carnarvon Drive[6] diamond junction is the Music Box public house, which itself contains a customer car park.

[5] https://www.hillingdon.gov.uk/article/24506/Harlington-Adult-Learning-Centre
[6] which becomes Conway Drive at this point.

During the initial survey period, a small number of cars were observed in the pub car park. Later in the evening, the pub car park was also informally observed to have fewer free parking spaces but there was still capacity.

In order for this pub to constitute a problem there would need to be concern that it was *regularly* hosting events which were attended by car drivers and passengers from a much wider area, *and* which led to parking *throughout* the surrounding streets. This would need to be a sufficient problem for parking not to be dispersed, despite there being four routes leading directly away from the pub.

There was no reason to think that this was the case.

✘ **There is no evidence to support local shops or services being a parking concern**

Pinkwell Park

Pinkwell Park is a large urban park, flanked by long parking areas on Carnarvon Drive and also perpendicular to this on Pinkwell Lane (see previous comments on Pinkwell School). The park includes a grassed playing field, together with a skateboard park and bowling green[7].

Parks can attract visitors from further afield, especially for family gatherings, although this tends to be far more likely in country parks, or in parks with particular attractions, such as boating lakes or large adventure playgrounds.

Pinkwell Park itself has a car park with 20 spaces, and this was observed during the school pick up period at a time when it might have been used as an overflow for this. However, the car park is approached in an entirely different direction, via Waltham Avenue. At no time during the survey period were any cars noted parked in it.

However, it is suggested that the car park could experience moderate usage, especially on weekends. This was not deemed as being worthy of further surveying at this time.

However, far more significant was the huge flank of empty parking spaces which were available adjacent to the park. These totalled around 25 spaces to the south of the park entrance[8] on Carnarvon Drive, with an additional 20 spaces in the long parking strip on Pinkwell Lane.

This parking provision **effectively cancels out any concerns about parking elsewhere**, especially as all the space on Carnarvon Drive is well within the 200m considered as reasonable for surveying according to the Lambeth Protocols.

Parking spaces adjacent to Pinkwell Park

The car park in Pinkwell Park remained empty during the entire afternoon observation period

✓ **The park is clearly a substantial net benefit in parking terms**

[7] https://www.hillingdon.gov.uk/article/26605/Pinkwell-Park
[8] The parking survey did not count the area immediately around the park entrance as available for parking, as this constituted a break in the pavement. However, there was no express prohibition of parking in this spot, and it is suggested that an additional two cars could park here.

Local Facilities

Goals Heathrow

During the evening survey, it was observed that football games were taking place adjacent to the Pinkwell Primary School.

This was confirmed on the local map to be at the "Goals Heathrow" facility. However, this centre does claim to provide free and staffed on-site parking, with further parking available on the approach road.

There was no reason to believe that the parking requirement would overflow onto Pinkwell Lane. If this was the case, then a large number of cars would have been visible adjacent to the school. In the evening observation period, this entire strip was observed to be empty.

✘ **There is no evidence to support this being a parking concern**

Bourne Farm Recreation Ground

To the east of the top of Skipton Drive lies the Bourne Farm Recreation Ground[9], where a number of football pitches are provided. Limited parking spaces were available within the club. As this is a leisure facility, it was anticipated that the busiest periods for parking would be during weekend mornings, at a time when other parking stresses would be significantly reduced.

This was not considered to be worthy of further investigation.

✘ **There is no evidence to support this being a parking concern**

[9]http://www.hillingdon.gov.uk/webmap?dt=19%2C18%2C55%2C65%2C1%2C27%2C11%2C68%2C7%2C13%2C22%2C31%2C30&qx=-0.442421&qy=51.500282&ux=&uy=&ds=1&dd=4&do=4&px=&py=&pl=&pa=&pt=&tl=Map+layers&td=Details

Cherry Lane Cemetery

Cherry Lane Cemetery is approached from Shepiston Lane to the south of the application site, and is not directly accessible from the site by road, other than a side entrance for pedestrians only.

Drivers can access the cemetery roads to visit grave sites, although no central parking facility exists. Visitors could park at the end of Pinkwell Lane in order to visit the cemetery, although there is no designated space for this, as this is not the main entrance.

A crematorium or other facility that regularly conducts funeral services can create a major traffic problem, and one which needs to be very sensitively enforced. However, no such facilities exist at this location, and therefore this is dismissed as a parking concern.

✘ **There is no evidence to support this being a parking concern**

Christ Church (Church of England) and Daycare Centre

Churches and other religious buildings can create a substantial parking problem, especially as some churches can attract a congregation from a very wide area, whilst also holding services at times when public transport might not be available.

However, it is evident that this is only a very small church with attached day care centre.

Although car parking facilities within would only be sufficient to hold around 10 cars, a sizeable amount of parking is available in the near Pinkwell Park, and there are no apparent restrictions preventing congregation members from parking here.

In the event of a heavily subscribed church event, then it is suggested that parking would overflow onto the nearby streets, primarily Waltham Avenue, or Glamis Crescent, which is connected to the church via a short public footpath link.

There is no reason at all to believe that there would be any conflict between this church and parking for residents.

It is possible that the day care centre could create a localised parking problem at pick-up, although this was not considered likely to have any impact on Carnarvon Drive.

✘ **There is no evidence to support this being a parking concern**

Prologis Park

Prologis Park is a substantial industrial estate situated on the former MOD Records depot, to the north-west of the survey area. The site has been recently developed, with planning approval granted in 2005.

However, motor vehicle access is much further to the west, being via Stockley Drive. Barrier controls prevent motor vehicle access between Prologis Park and the local estate.

A substantial number of staff car parking spaces are provided within the site, and it is not believed that there is a major problem with overflow parking. Nine Acres Close has parking control by way of double yellow lines on one side, creating very limited opportunities to park on the street.

The detailed afternoon parking survey showed no reason to believe that there was any overflow parking happening in this location.

✓ **The restricted access to Prologis Park is a significant highways benefit**

✘ **There is no evidence to support this being a parking concern**

Residential Parking Factors

In terms of residential parking provision, the survey the survey area can be defined as follows:

- There are no parking restrictions covering the locality as a whole, other than an overnight ban on buses and trucks over 5 tonnes. This is common across London, and prevents commercial operators from using residential streets for parking.
- Pembroke Way itself is a short pedestrian link between Skipton Drive and Carnarvon Drive, comprising 12 semi-detached properties, four of which have direct frontage onto the highway.
- In total, there are 8 properties on Pembroke Way which do not have a direct frontage onto the highway, one of these being number 5.
- Carnarvon Drive contains a mixture of semi-detached and short terraced houses,the majority of which have driveways for off-street parking.
- The entire eastern portion of Carnarvon Drive from the intersection with Pembroke Way down to the junction with Pinkwell Lane is flanked by Pinkwell Park, with a long strip of parking space for around 25 cars.
- Skipton Drive contains predominantly semi detached houses, although there are a number of three-storey flats at the top, and along adjacent Bourne Avenue. These properties all have a mix of forecourt and garage parking.
- Driveway parking is much rarer on Skipton Drive, with a number of houses being recessed from the street, with well landscaped gardens, such that drive access would not be possible.
- Properties to the rear of Skipton Drive on the western side have garages, with rear access, although these appear to be lightly used.
- The rear of Skipton Drive also has access to allotments.
- The majority of cars in the area surveyed were shorter types, with a predominance of hatchbacks. However, there were also around 3-4 vans noticed in each survey period. These can typically be catered for in the larger gaps between driveways, which are typically not long enough to park two standard cars.
- There are two disabled spaces on Skipton Drive. These were not included in the survey count.

Car Clubs

TfL policy supports the development of car clubs as an important means towards encouraging reduced car usage by reducing the need for car ownership. Car clubs achieve this objective by making cars available for members on an ad hoc basis, but by doing so in a way that makes car usage more expensive on a per hour or per mile basis.

City Car Club

The nearest car club location is situated in Drayton Garden Village, approximately 20 minutes' walk away, with space for just one car.

Given this distance, combined with the lack of available vehicles, it is not considered that car club membership would be likely at this time.

Drivenow

An alternative form of car club is provided by Drivenow, whereby the user selects an available car based on cars allocated parking spaces being available as part of the existing permit controlled parking area within a borough

Car Hire

The proximity of Pembroke Way to Heathrow Airport does ensure that residents have an exceptional range of access to a wide choice of hire cars, and this might typically be useful for weekend or longer trips away, or for hiring a car for local trips where bulky items need to be carried.

EVCPs (Charging Points)

New developments are required by Transport for London to provide charging facilities for electric cars. However, the application site is not a new development, but merely one which seeks to convert an existing property from a house into flats.

At present, around 1.5% of new cars sold in the UK are electric vehicles, and whilst this is a relatively small proportion at present, this is expected to grow substantially in future years. Given that electric cars are only 1.5% of sales, and not of the vehicle fleet, the chances that any new occupant would arrive with an electric car are substantially less than 1%.

Clearly, given the location of 5 Pembroke way, it would not be possible for the property owner to install an electric vehicle charge point in relation to this development, as this would require running long cables under publicly owned land, in order to supply a dedicated charging point, which would itself be on public land and which would not be designated for the sole use of number 5 Pembroke Way. However, the same problem applies to numerous other properties in the locality.

The immediate locality is clearly one which would benefit from the provision of on-street charging points, and this remains the case irrespective of this planning application.

✘ **Lack of charging points is not a significant planning concern**

✓ **The surrounding area is highly suitable for on-street EVCP provision**

Accident History

The Crash Map shows all reported road traffic accidents in the area around Pembroke Way for a 10 year period between 2005 and 2014.

This map shows that a total of 7 accidents occurred on Carnarvon Drive during this period, all of them slight. There were no reported accidents in 10 years on Skipton Drive. A total of 8 accidents were reported on Pinkwell Lane between Carnarvon Drive drive and Mildred Avenue, and this includes 2 serious accidents outside Pinkwell Primary School.

There are many other roads on this map which have a history of zero accidents over this 10 year period, and nearly all of them share the same characteristic, namely that they are dead end streets, or that they form a loop with other streets, without offering any attraction to through traffic. This is known as "filtered permeability", and this is the cornerstone of the most recent "mini Holland" developments in other London boroughs.

In terms of drawing a comparison for Carnarvon Drive, i.e. a road which is not a major trunk road, but which is still a bus route, then one comparison might be with Crowland Avenue. Whilst the outright number of accidents on these roads during the 10 year period is very similar, (8 on Carnarvon Drive and 7 on Crowland Avenue), the nature of the accidents on Crowland Avenue was much more severe, with one serious and one fatal incident.

The accident rate on the roads around Pembroke Way is relatively low when compared with similar streets in West London. Whilst there are various measures which could be undertaken to make the roads safer, it is abundantly clear that there is no validity in the claim that one or two extra parking spaces would create a significant concern on highways grounds.

Public Transport

Local Bus Services

The closest bus stop to Pembroke Way sits immediately adjacent to the junction with Carnarvon Drive. This is served by local bus U4, which has a frequency of up to every 6 minutes during the morning and evening peaks, with an off-peak headway of 20 minutes.

Whilst bus route U4 terminates in the nearby Prologis Park, situated less than 10 minutes' walk to the northwest of Pembroke Drive, it provides a number of useful transport links throughout the rest of its route as it heads through Hayes and towards Uxbridge.

Bus 696 runs through the local area during the school run.

A much wider range of bus routes is available on the nearby Redmead Road, around 1.5km or 20 minutes' walk away.

Other bus services are available by walking through the Prologis Park and picking up buses on Stockley Drive.

✓ Local bus route U4 connects with many local facilities

✓ Substantial routes via Redmead Road (20 minutes walk) or bus connections

National Rail

The nearest National Rail station to Pembroke Way is at Hayes and Harlington, which is around 25 minutes' walk, but which benefits from a high frequency of bus connections, using service U4.

Paddington station is 17-25 minutes' journey from Hayes & Harlington by train, depending on stopping patterns. A range of local stopping services continues towards Reading. Passengers can change at Slough or Reading for fast services to major destinations in the southwest of England, and additionally in South Wales.

In addition to the services on the Great Western mainline, Hayes and Harlington is also a stop on the Heathrow Connect route, which provides two trains per hour running between London Paddington and the Heathrow terminals (direct to Terminals 2/3 and Terminal 5; local shuttle train to Terminal 4).

When Crossrail is fully open in December 2019, it will provide direct links from Hayes and Harlington right the way through Central London and Canary Wharf, with services continuing as far as Shenfield in Essex or Abbey Wood in the eastern reaches of London.

This will significantly improve the range of public transport options from this part of the London Borough of Hillingdon, making it easier to pursue a car free or low carbon lifestyle.

Fast trains from Hayes and Harlington reach London Paddington in as little as 17 minutes. The station benefits from excellent rail connections because of the interchange it provides with the Heathrow Connect service.

The Old Vinyl Factory development around Hayes and Harlington station is demonstrating the clear demand for property in the locality, buoyed by the development of Crossrail, which is scheduled to open in December 2019.

✓ **Excellent local and national links via Hayes & Harlington**

✓ **Crossrail will improve rail services from 2019**

Underground

The nearest underground railway station is at Hatton Cross, which can be reached using local bus services. As the most westerly stop on the Piccadilly line before the Heathrow Airport complex, Hatton Cross benefits from an excellent level of service, providing underground connections through Hounslow and Acton and then into central London via Hammersmith and Earls Court.

The local bus U4 provides a direct connection to Uxbridge station, from where Metropolitan and Piccadilly line trains run towards central London.

Although faster journeys into central London are available via Paddington, both the Piccadilly and the Metropolitan lines provide a wide range of useful connections throughout northwest London, including to destinations such as Harrow (Harrow on the Hill), Park Royal and Wembley Park.

From Hayes and Harlington easy connections to the rest of the London Underground network are available via Paddington, which is on the Bakerloo, Circle and Hammersmith and city lines.

Additional local underground connections are available by changing onto the District or Central lines at Ealing Broadway, which can be just one stop away from Hayes and Harlington on faster local services.

✓ **Limited Underground connections via Uxbridge or Hatton Cross**

Active travel

Walking

The area around Pembroke Way benefits significantly from being **shielded from through motor traffic**. This is provided by a range of different geographical features which combine to ensure the area has no appeal for rat running or any other through traffic:

- ✓ There are no through roads to the northwest of the site, because this area is bound by the Great Western main line and the Heathrow Airport spur through Airport Junction.
- ✓ Bourne Avenue was closed to through traffic with the Prologis development. This means that all vehicle traffic from this large industrial site has to access the complex from the west, using Stockley Drive. The only vehicular traffic that is able to exit from the Prologis Park to the east is the U4 bus.
- ✓ The only direct route to the south from Pinkwell Lane is a footpath and closed road that runs down the side of Pinkwell school. This route is not open to motor traffic.
- ✓ Pedestrians can walk through Pinkwell Park, and continue east along Waltham Avenue towards Hayes town centre.
- ✓ A footpath is available through the cemetery, but it is not open to vehicles.

Observations during the study period showed that general traffic levels on Carnarvon Drive were extremely low for a road that is open as a bus route, and that traffic levels are generally very low on the other roads in the neighbourhood.

However, a small number of speeding motorists were observed, and it is acknowledged that there are no measures in place, either through physical traffic calming or through speed limitation in order to counteract this. However, the environment remains one that is *generally* **very attractive to walking**, and also an environment that is extremely permeable to walking in all directions.

These routes are in addition to walking routes which are available alongside the existing highway. Collectively, the walking network provides easy access to local schools (Pinkwell primary), library facilities (Harlington library), and public transport facilities (various, as per above).

The nearest convenience stores are located at the top of Carnarvon Drive, whereas the nearest large retail facility is the Asda Hayes supercentre. This can easily be accessed on foot in around 15-20 minutes, whereas the main Hayes town centre sits just above this, and is reachable in around 20 to 25 minutes.

The local area includes a number of large employers, both via the Prologis Park and through other employment areas in and around Hayes town centre.

✓ **Highly permeable network of foot paths in addition to routes on local roads**

Cycling

The immediate area around Pembroke Way is characterised as being relatively cycle friendly, largely due to the absence of through traffic. Whereas motor vehicles other than buses are prohibited from accessing The Prologis Park, this route remains permeable for cycling.

Stockley Drive has segregated cycle paths running as far as Stockley Park. Whilst the junction designs are not user friendly, it offers a considerably more attractive alternative to cycling on the highway.

A variety of recreational routes are available around Stockley Park, whereas a long uninterrupted cycling route exists along the Grand Union Canal, which passes along the southern side of Stockley Park.

Generally, cycling provision is considered to be reasonable relative to the rest of west London.

Parking Compliance

Bus stops, especially on Carnarvon Drive.

Bus stop parking in London is generally extremely rare. The surveyor has conducted traffic and parking surveys across the Midlands as well as in London, and whilst parking in bus stops is common elsewhere, it is very tightly enforced in London. There is no reason to believe any motorist would risk anything other than briefly picking up or setting down a passenger in a bus stop[10].

Around Pinkwell Primary School (crossings or school zig-zags).

The only observed transgression was a case of a car parked *partially* in the zig-zag that was furthest away from the school, with the driver remaining in the car. Given the sheer length of the restrictive markings outside the school, the level of compliance observed was astonishingly high.

An area of high parking stress would also have plenty of examples of residents parking on corners, on pavements, or simply parking in a way which made access to drives difficult. Even though some double yellow lines had not been repainted following the resurfacing on Carnarvon Drive, there was no reason to suggest that any of the above were prevalent.

In these cases, parking stress surveys can often find parking levels well above 100% of available (legal) spaces. Other than around Pinkwell School, as already mentioned, there was some legal pavement parking on nearby Wentworth Crescent. This is generally permitted in locations where the streets are narrow, yet the pavements are wide enough to be able to accommodate cars, and is usually on a "half-on-half-off" basis.

There is simply no reason to assume that there would be any problem with pavement parking on the streets around Pembroke Way, and none was observed.

It is noted that Pembroke Way itself is a pedestrianised street. However, there is simply no way to drive a vehicle onto it, as the footpaths are protected by bollards, and thus there is no reason to expect any compliance issues here.

It can therefore be considered that the location is one of **extremely high parking compliance**, and that parking is not a cause for concern.

A more detailed hourly parking beat study would *not* reveal any further concerns.

[10] It is, however, noted that there is one Royal Mail van in the bus stop in the Google Streetview image. This is not considered as a symptom of a major problem, especially as Royal Mail vans have exemptions from double yellow parking, and this sometimes leads to drivers parking elsewhere in the mistaken belief that they have the same exemption.

Survey Results

Any parking study can only be a snapshot of the parking situation in any given locality. Whilst a fully comprehensive beat study might take an hourly count over a period of several days, an effective study will need to gather *sufficient* data to show whether or not there is a parking concern, without incurring undue costs to the client.

Scope of Survey

Through the methodology determined above, it was determined at an early point that the most significant parking stress was likely to be around school pick uptime, and the extent of this was determined as a key factor for the survey.

It was also determined that, in accordance with the Lambeth parking study guidance, a night time study would be required in order to determine the likely highest level of parking stress across the study area, other than the aforementioned school pick up period.

A single evening of study clearly determined that night time parking is not a significant problem in this location.

- ✓ There were no apparent special events taking place during the survey period.
- ✓ There were no ongoing road works, although Carnarvon Drive had recently been resurfaced.

Thursday 28th April 2016

1. At 14:45 - specifically looking at **school run** parking issues (including the school itself).
2. At 15:30 - general **late afternoon** parking survey.
3. At 16:00 - informal study of Bourne Avenue shops and Nine Acres Close.
4. At 22:00 - **evening** parking count.

An additional **night time** study was undertaken at 00:30 on the night of Thursday 3rd May 2016.

Survey Tables

STREET	SKIPTON DRIVE				CARNARVON DRIVE			
LOCATION	NW	NE	SW	SE	NW	NE	SW	SE
ZONE	A	B	C	D	E	F	G	H

SCHOOL RUN	A	B	C	D	E	F	G	H	TOTAL
SPACE							4	4	**8**
TAKEN	***ONLY CARNARVON DRIVE SOUTH SURVEYED***						9	21	**30**
TOTAL							13	25	**38**
STRESS							**69**	**84**	**79**

LATE AFTERNOON	A	B	C	D	E	F	G	H	TOTAL
SPACE	9	13	7	12	5	10	4	25	**44**
TAKEN	18	5	9	6	8	4	9	0	**21**
TOTAL	27	18	16	18	13	14	13	25	**144**
STRESS	**67**	**28**	**56**	**33**	**62**	**29**	**69**	**0**	**15**

EVENING	A	B	C	D	E	F	G	H	TOTAL
SPACE	7	8	7	6	4	5	6	25	**40**
TAKEN	20	10	9	12	9	9	7	0	**25**
TOTAL	27	18	16	18	13	14	13	25	**144**
STRESS	**74**	**56**	**56**	**67**	**69**	**64**	**54**	**0**	**17**

NIGHT	A	B	C	D	E	F	G	H	TOTAL
SPACE	5	4	4	4	3	3	3	25	**51**
TAKEN	22	14	12	14	10	11	10	0	**93**
TOTAL	27	18	16	18	13	14	13	25	**144**
STRESS	**81**	**78**	**75**	**78**	**77**	**79**	**77**	**0**	**65**

Aditional Daytime Images

Parking alongside Pinkwell Park (school run period)

Gaps in parking alongside Pinkwell Park during the school run period.

Looking north on Stockton Drive in the afternoon, (adjacent to ~#27) noting that many gaps exist, despite a number of cars being present.

Driveway parking keeps many cars off the street, whilst allowing enough gaps to enable the remaining cars to be parked safely (~#21 Skipton Drive, looking south).

Night Images

Gaps remain between properties on Skipton Drive (adjacent to #45, looking south).

Skipton Drive general view

Looking south on Carnarvon Drive, with the entrance to Pinkwell Park on the left and Pembroke Way on the right, showing that plenty of car parking spaces exist in the evening.

Looking south on Carnarvon drive showing empty spaces adjacent to Pinkwell Park

Looking north showing available space on Carnarvon Drive, with the bus stop before Glamis Crescent on the right

Looking south on Carnarvon drive, ~level with #25, showing the wide availability of parking spaces.

Summary

It is clear from the extensive local transport survey that has been undertaken that there are no material grounds for refusal of this application on Highways grounds.

- ✓ Application meets all policies of the London Borough of Hillingdon.
- ✓ Sustainable location with excellent transport links.
- ✓ Clear local demand for this type of accommodation.
- ✓ Zero or Minimal Impact on parking spaces.
- ✓ No material highways grounds for objection.
- ✓ Inherently safe local streets due to lack of through traffic.
- ✓ Residual concerns can be met through conditions, not refusal.

Conclusion

A detailed survey has been undertaken, covering **all modes of local transportation** around the applicant's property.

This has included an in-depth examination of the previous objections in terms of Highways safety, and in particular around concerns that residents might park in or adjacent to the bus stops at the eastern end of Pembroke Way.

The survey has found that there are no valid concerns surrounding the bus stop. Although the survey has shown that there is a period of heavy usage around school pick up time, this is not considered to be substantial, as it only concerns *one of the four* possible parking areas around the property, and only for a brief period. Relative to other schools elsewhere in London or across the United Kingdom, parking behaviour is considered to be excellent.

The survey has further shown that the very reasons previously cited as grounds for refusal have actually combined to create a location that has very limited parking stress, that is permeable to pedestrians whilst not being blighted by through traffic, and that is inherently adaptable towards low car or non car lifestyles.

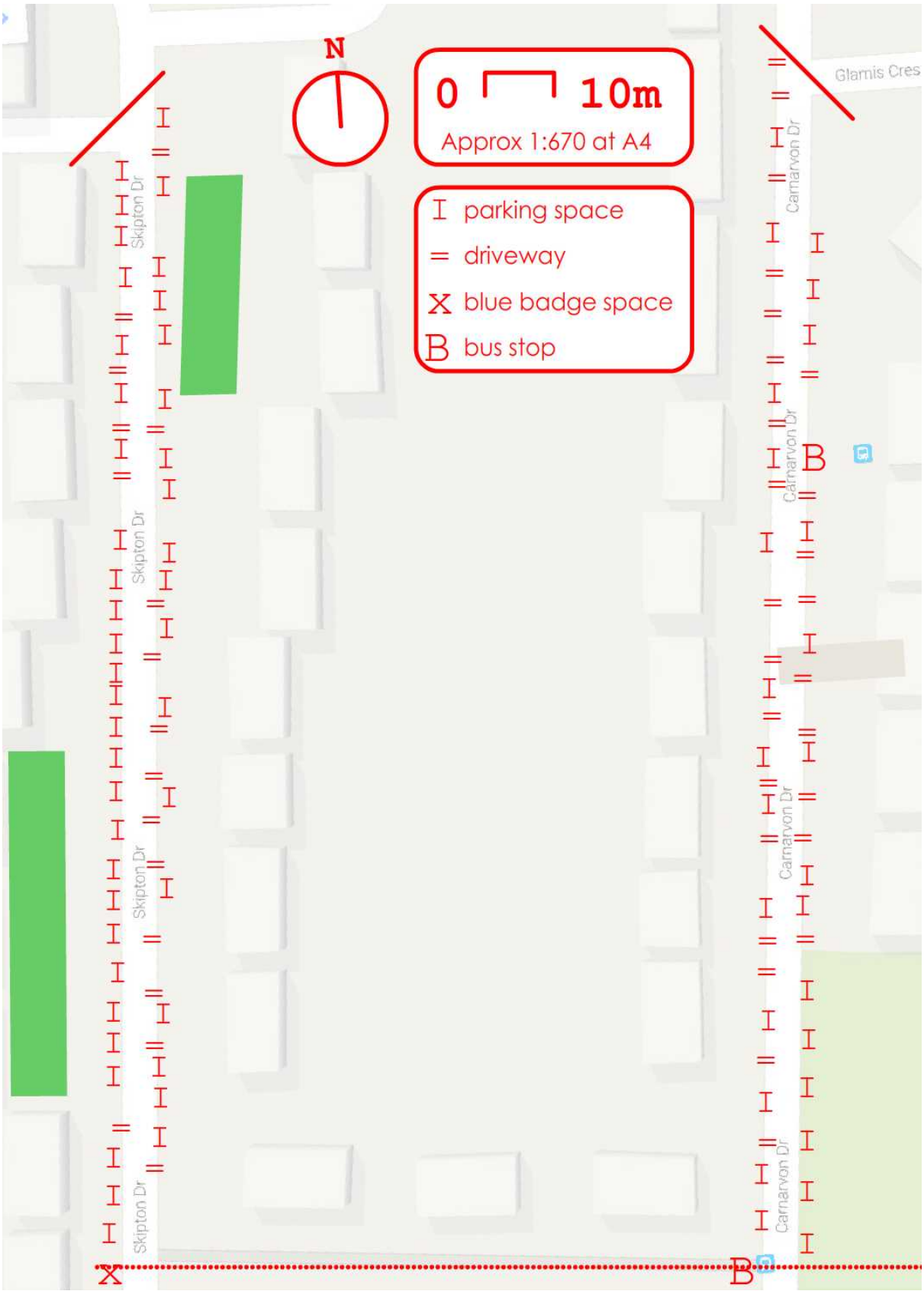
However, the assumption remains that the new occupants will own cars, and that their usage will be similar, or very slightly higher than the current permitted usage for a four bedroom dwelling at the application location.

It is abundantly clear that the local streets are perfectly capable of taking one extra parked car, and this will have a statistically insignificant impact on the local area.

Maps

1. Local area - northern side
2. Local area - southern side
3. Local area - external parking stressor
4. Walking routes
5. Cycling routes
6. Crash map (C) Crash Map
7. PTAL map (C) TfL
8. Bus route - U4 (C) TfL
9. Bus spider map - Hayes & Harlington (C) TfL
10. London Tube Routes (C) Peter Saxton
11. GWR regional routes (C) GWR

All maps are (C) Google, used under Google licence terms from print documents, unless otherwise stated.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driveway
blue badge space
bus stop
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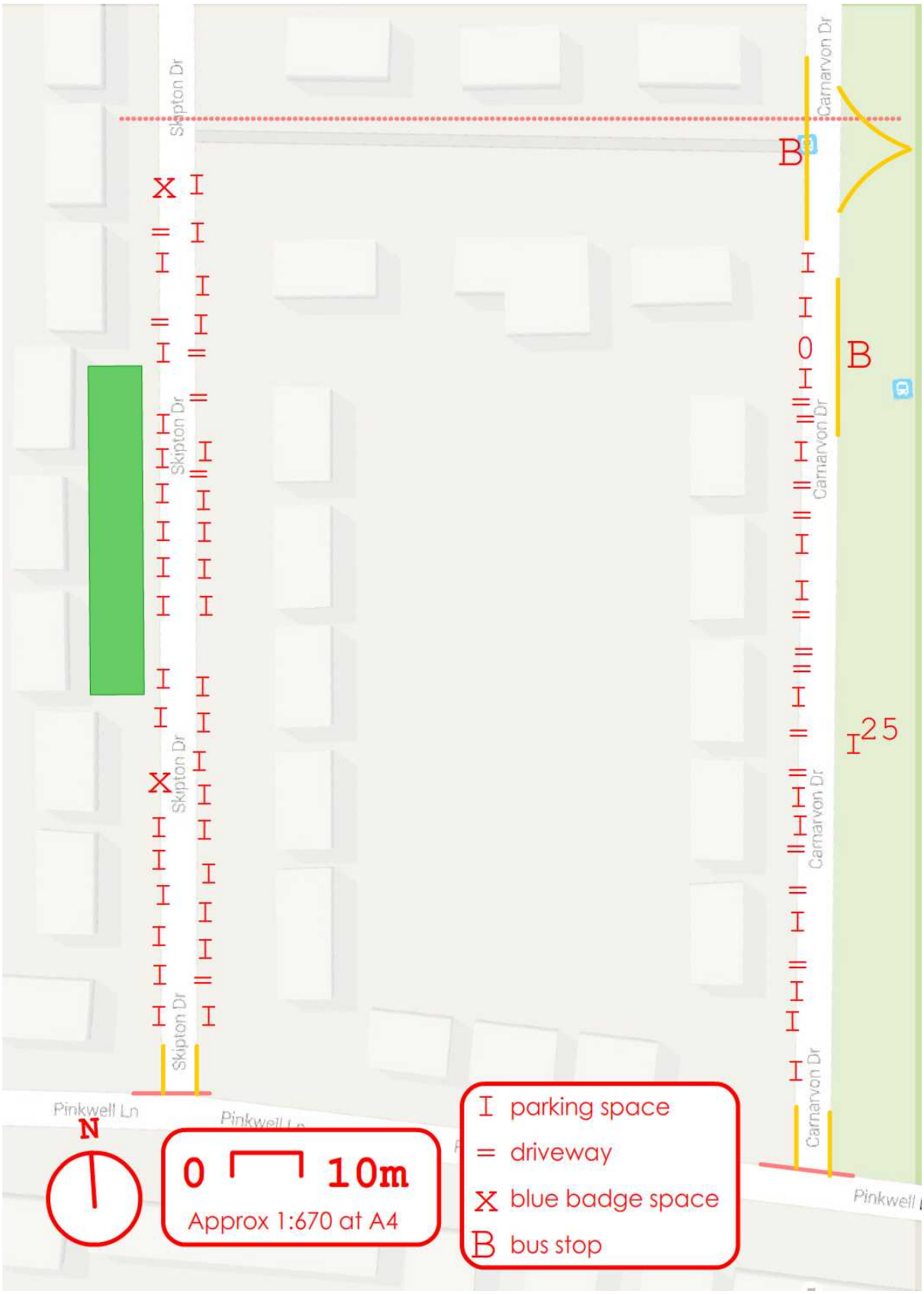
Carnarvon Dr
Glamis Cres
X
B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Carnarvon Dr
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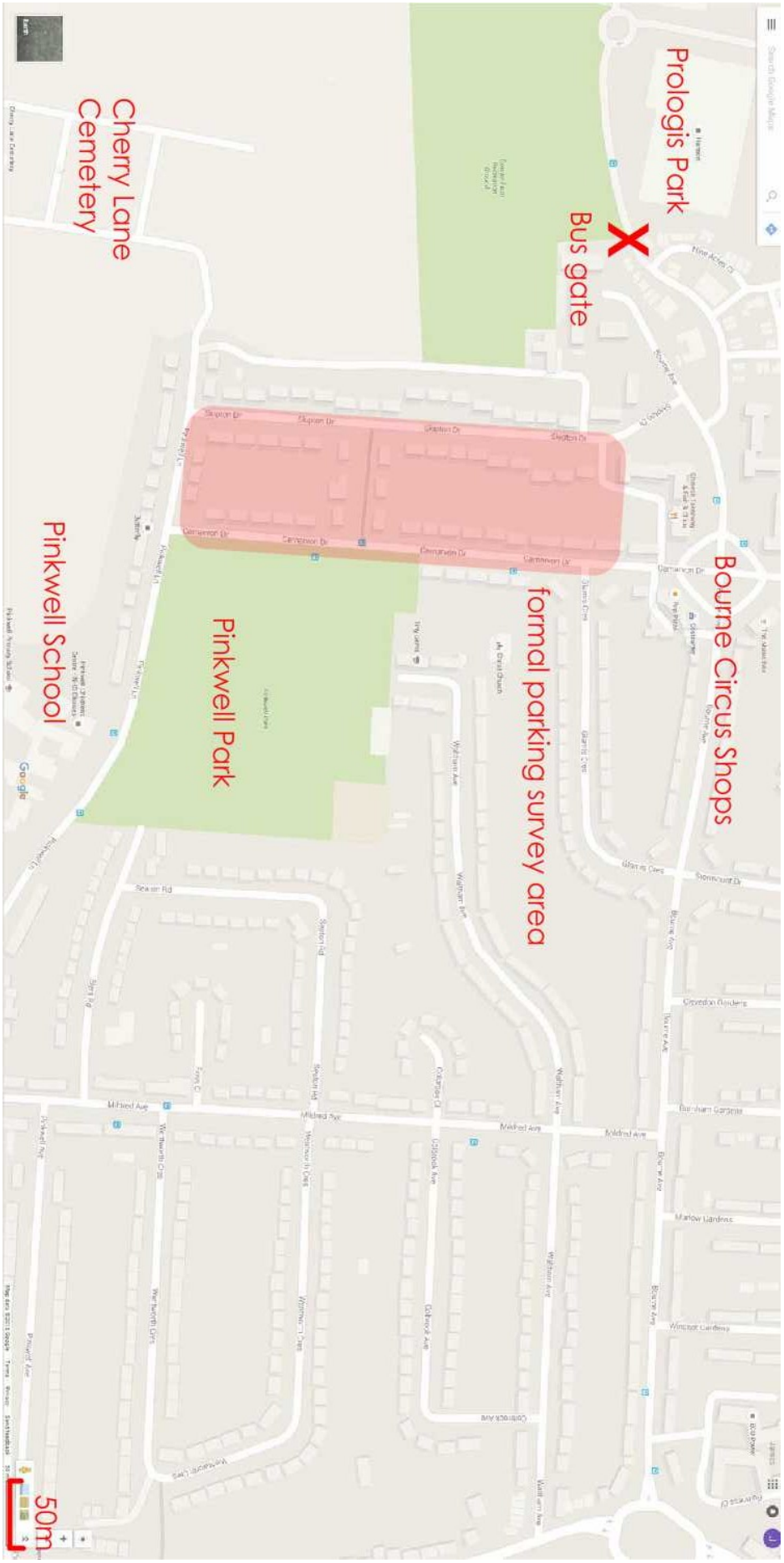
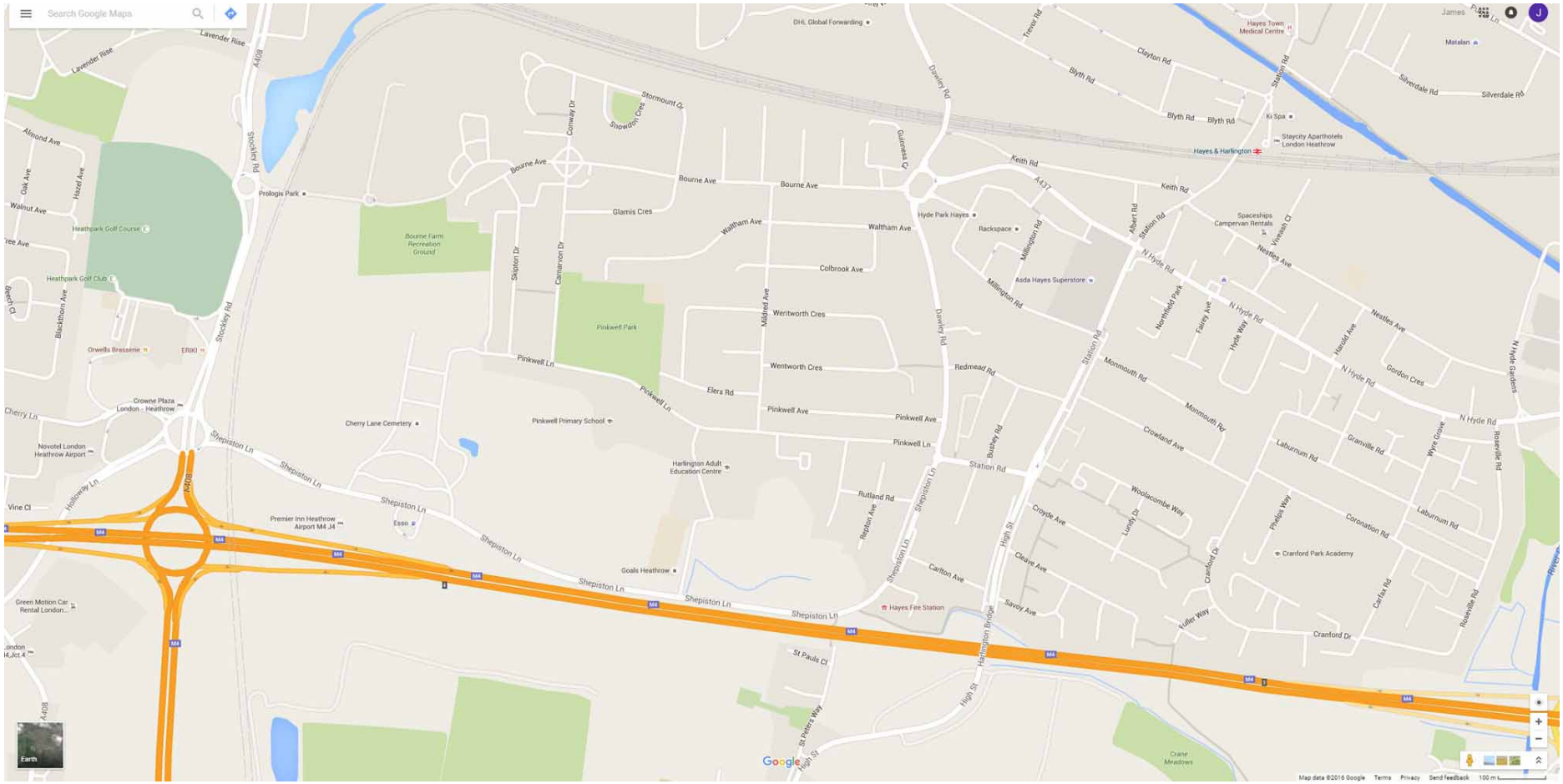
Approx 1:670 at A4
parking space
driveway
blue badge space
bus stop


Prologis Park
Bus gate
Cherry Lane Cemetery
Pinkwell School
Pinkwell Park
formal parking survey area
Bourne Circus Shops
50m

#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Lavender Rise
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Heathpark Golf Club
Beech Cl
Blackthorn Ave
Orwells Brasserie
ERIKI
Crowne Plaza London - Heathrow
Cherry Ln
Novotel London Heathrow Airport
Hollonly Ln
Vine Cl
Premier Inn Heathrow Airport M4 J4
Esso
Green Motion Car Rental London...
Earth
Prologis Park
Bourne Farm Recreation Ground
Bourne Ave
Conway Dr
Stormont Dr
Snowdon Cres
Glamis Cres
Skipton Dr
Cairnanon Dr
Waltham Ave
Colbrook Ave
Pinkwell Park
Pinkwell Primary School
Cherry Lane Cemetery
Pinkwell Ln
Pinkwell Ave
Elers Rd
Wentworth Cres
Mildred Ave
Harlington Adult Education Centre
Shepiston Ln
Goals Heathrow
Rutland Rd
Hepton Ave
DHL Global Forwarding
Dawley Rd
Guinness Cl
Hyde Park Hayes
Rackspace
Asda Hayes Superstore
Millington Rd
Redmead Rd
Butley Rd
Station Rd
Hayes Fire Station
Carlton Ave
Cleave Ave
Savoy Ave
Harlington Bridge
High St
St Pauls Cl
St Peters Way
Crane Meadows
Keith Rd
A437
Albert Rd
Northfield Park
Fairey Ave
Hyde Way
N Hyde Rd
Nestles Ave
Vivash Cl
Harold Ave
Gordon Cres
N Hyde Gardens
Monmouth Rd
Monmouth Pl
Crowland Ave
Croyde Ave
Woolacombe Way
Lundy Dr
Cranford Dr
Cranford Park Academy
Laburnum Rd
Granville Rd
Wyre Grove
Roseville Rd
Coronation Rd
Pheloe Way
Carlos Rd
Fuller Way
Hayes Town Medical Centre
Trevor Rd
Clayton Rd
Blyth Rd
Silverdale Rd
Ki Spa
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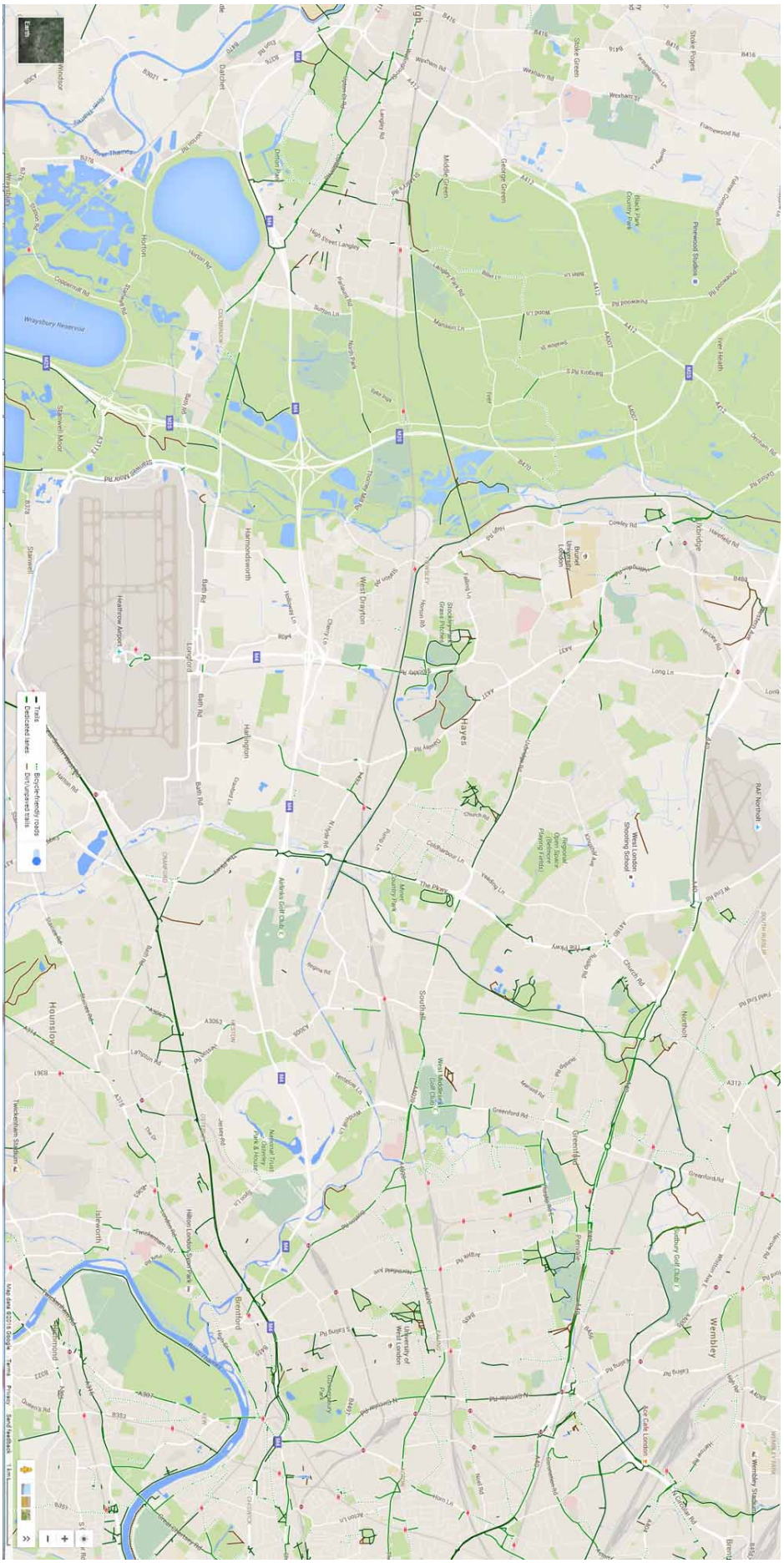
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Dedicated lanes
Unpaved trails
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River Thames
Datchet
Horton
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Staines
Heathrow Airport
Hammersmith
West Drayton
Hayes
Uxbridge
Brunel University London
Harlington
Cranford
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Southall
Northolt
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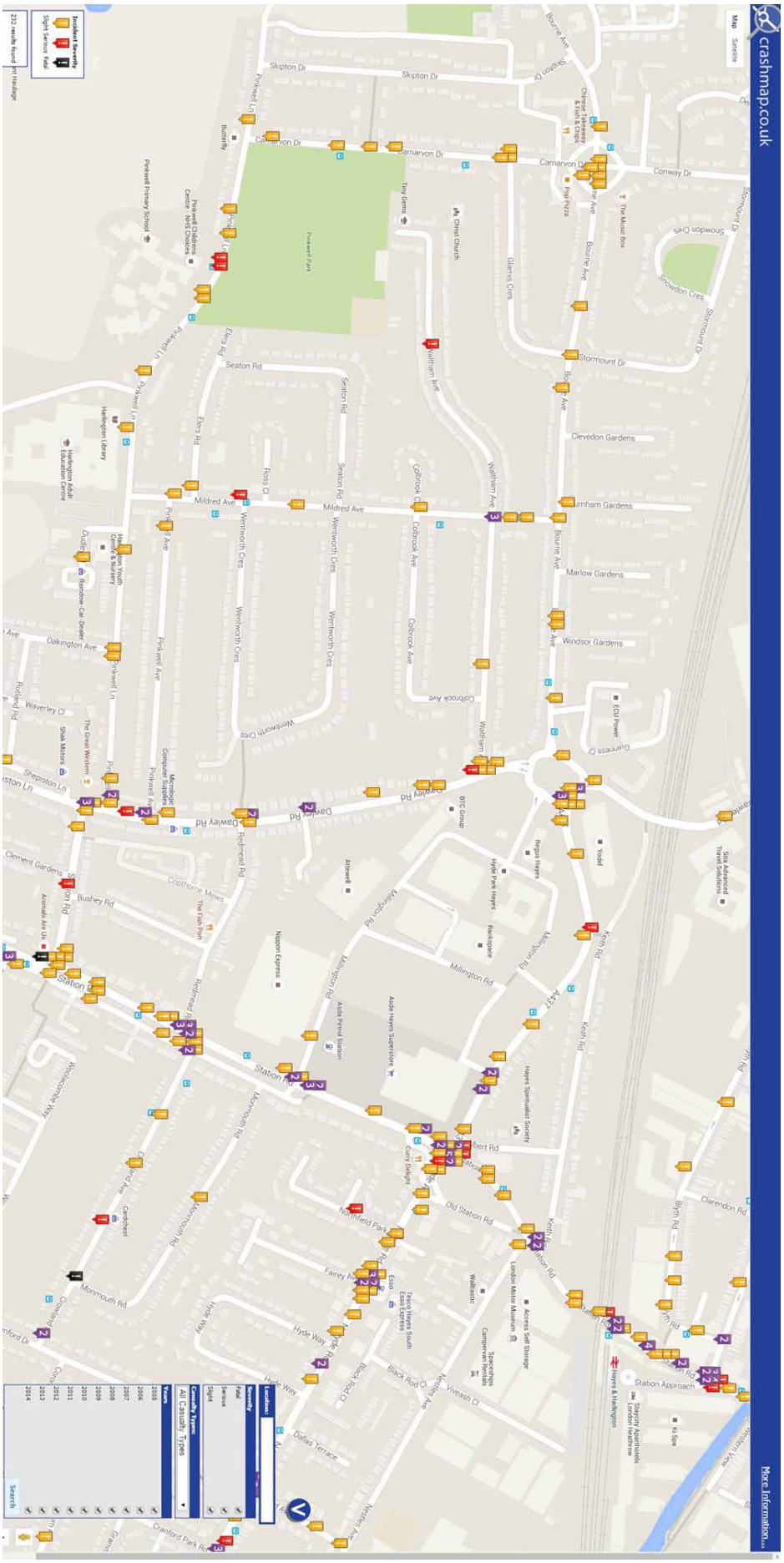
Wembley
RAF Northolt
Harlington Golf Club
Hounslow Heath Golf Club
Wembley Stadium


crashmap.co.uk
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Carnarvon Dr
Conway Dr
Stormont Dr
Snowdon Cres
Bourne Ave
Glamis Cres
Pinkwell Primary School
Pinkwell Children's Centre - NHS Choices
Pinkwell Park
Elers Rd
Seaton Rd
Waltham Ave
Clevedon Gardens
Mildred Ave
Wentworth Cres
Colbrook Ave
Marlow Gardens
Windsor Gardens
Oakington Ave
Pinkwell Ln
Pinkwell Ave
Hillingdon Library
Hillingdon Adult Education Centre
Hillingdon Youth Centre & Nursery
Rainbow Car Dealers
Shak Motors
The Great Western
Merrologic Computer Supplies
Dawley Rd
Redmond Rd
Bushey Rd
Clement Gardens
Coopthorne Mews
The Fish Pool
Animals Are Us
Station Rd
Monmouth Rd
Gardenhest
Woodcroft Way
Millington Rd
Nippon Express
Asda Petrol Station
Asda Hayes Superstore
Rackspace
Hyde Park Hayes
Regus Hayes
Attwell
BTC Group
Yodel
Keith Rd
Hayes Spiritualist Society
Curry Delight
Old Station Rd
Northfield Park
Fairey Ave
Esso
Essex Hayes South Service Station
Wallisdc
London Motor Museum
Access Self Storage
Campervan Rentals
Clarendon Rd
Blyth Rd
Avon Rd
Hyde Way
Black Rod Cl
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Dallas Terrace
Station Approach
Hayes & Harlington
Starcity Apartments London Heathrow
Ki Spa
Cranford Park Rd
Cranford Dr
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Casualty Types
All Casualty Types
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2006
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2008
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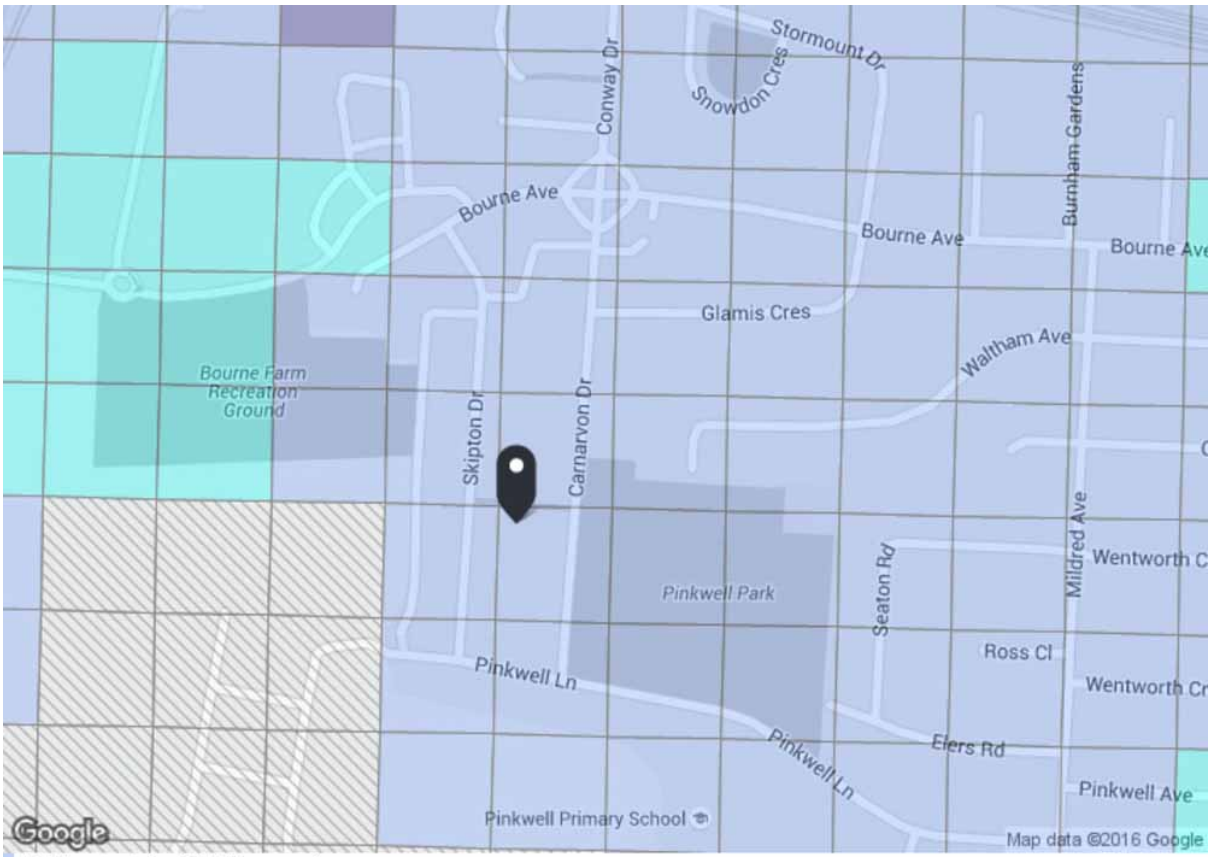
2011
2012
2013
2014
More Information...



PTAL output for 2011 (Base year)

1b

Easting: 508213. Northing: 179077

Map key - PTAL

- 0 (Worst)
- 1a
- 1b
- 2
- 3
- 4
- 5
- 6a
- 6b (Best)

Map layers

- PTAL (cell size: 100m)

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TRANSPORT FOR LONDON

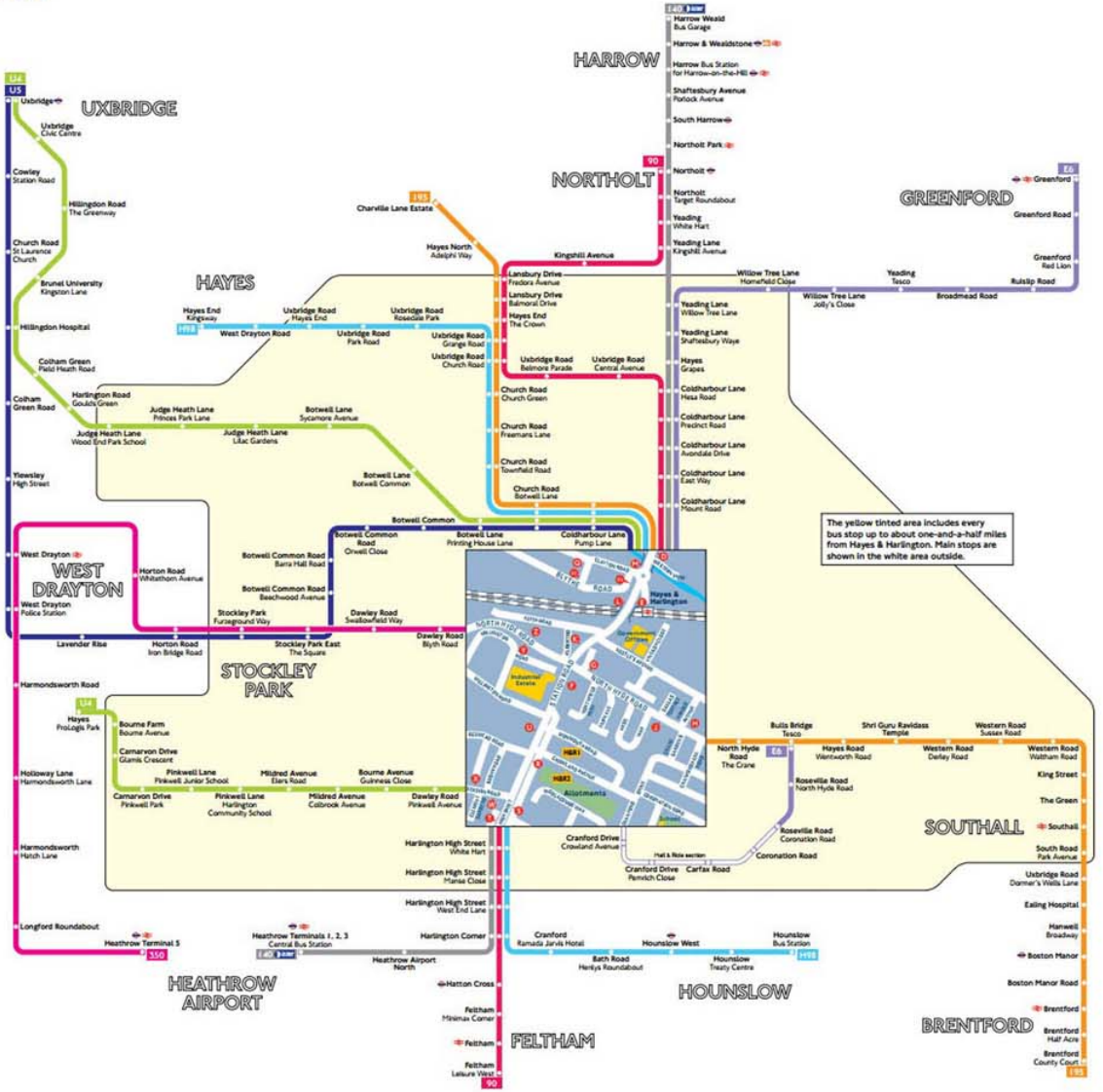
towards Hayes Town

Buses from Hayes & Harlington

Route finder

Day buses including 24-hour services

Bus route	Towards	Bus stops
90	Feltham	E F R S
	Northolt	K L M T U
140 (24 hour service)	Harrow Weald	K L M T U
	Heathrow Terminals 1,2,3	E F R S
195	Brentford	E G H
	Charville Lane Estate	J K L M
350	Heathrow Terminal 5	E G Y
E6	Bulls Bridge	E F H&R1
	Greenford	K L M U H&R2
H98	Hayes End	K L M T U
	Hounslow	E F R S
U4	Hayes ProLogis Park	E F G W
	Uxbridge	K L M U X
U5	Uxbridge	K L M



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Information correct from 29 September 2012

Bakerloo
Central
Circle
District
Hammersmith & City
Jubilee
Metropolitan
Northern
Piccadilly
Victoria
Waterloo & City
Overground
Docklands Light Railway
Emirates Air Line
No step-free access from street
Step-free access from street to platform
Step-free access from street to train
Step-free change between lines
This map is a prototype and will contain errors.
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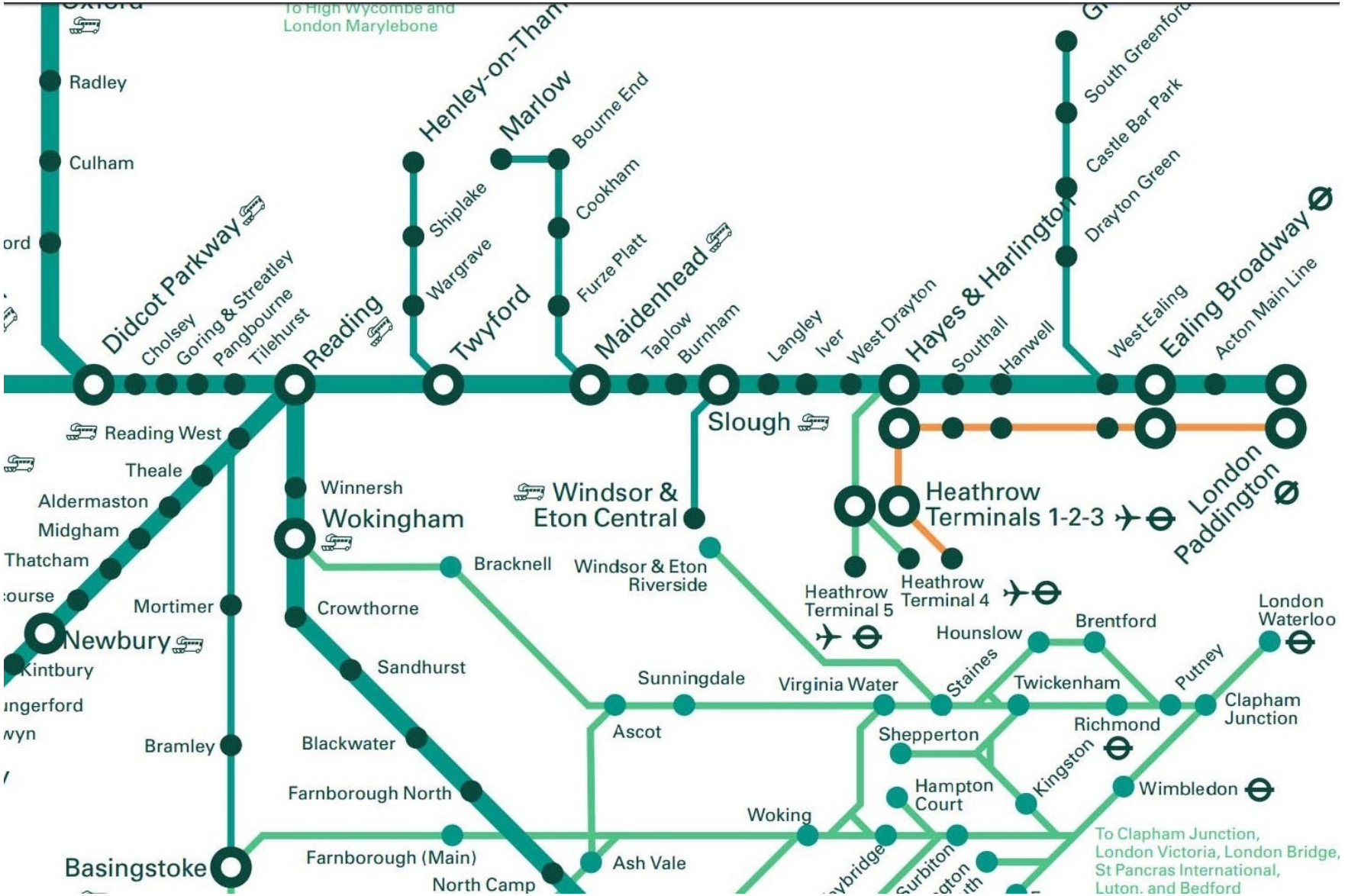
www.londonlayout.co.uk
© Peter Saxton 2013


To High Wycombe and
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Radley
Culham
Didcot Parkway
Cholsey
Goring & Streatley
Pangbourne
Tilehurst
Reading
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Shiplake
Wargrave
Twyford
Marlow
Bourne End
Cookham
Furze Platt
Maidenhead
Taplow
Burnham
Slough
Langley
Iver
West Drayton
Hayes & Harlington
Southall
Hanwell
South Greenford
Castle Bar Park
Drayton Green
West Ealing
Ealing Broadway
Acton Main Line
London Paddington
Heathrow Terminals 1-2-3
Heathrow Terminal 5
Heathrow Terminal 4
Reading West
Theale
Aldermaston
Midgham
Thatcham
Mortimer
Newbury
Kintbury
Bramley
Winnersh
Wokingham
Bracknell
Crowthorne
Sandhurst
Blackwater
Farnborough North
Farnborough (Main)
Basingstoke
North Camp
Ash Vale
Windsor & Eton Central
Windsor & Eton Riverside
Sunningdale
Ascot
Virginia Water
Staines
Woking
Hounslow
Brentford
Twickenham
Richmond
Shepperton
Hampton Court
Kingston
Wimbledon
Putney
Clapham Junction
London Waterloo
To Clapham Junction,
London Victoria, London Bridge,
St Pancras International,
Luton, and Bedford