
15 – 17 Uxbridge Road, Hayes: Application for Temporary Planning Permission - Transport Note – Response to Highways Comments

Ref: JN/ITL19655-002a

Date: 10 July 2024

SECTION 1 INTRODUCTION

1.1 Context

- 1.1.1** Aventex Properties S.A. ('Aventex') (the 'Applicant') has appointed i-Transport LLP to provide transport and highways advice with respect to an application for temporary planning permission at 15-17 Uxbridge Road, Hayes. The site is located within the London Borough of Hillingdon (LBH), who are also the local planning and highway authority.
- 1.1.2** The site benefits from planning permission (granted in 2022, planning ref: 69827/APP/2021/1565) for development of a 174 room apart-hotel. The application was supported by a package of Transport information prepared by i-Transport (i-Transport reference: ITL16339-003 - 008).
- 1.1.3** Construction for the consented hotel development has not yet commenced and the Applicant has, temporarily, let the site for the storage of materials/scaffold. This activity attracts a small number of movements to and from the site each day. LBH requested that the Applicant submit an application for temporary permission to allow use of the site for the storage of materials, with transport information provided by i-Transport (document ref: ITL19655-001a).
- 1.1.4** Comments on the application and the information submitted have subsequently been received from LBH Highways, dated 4th June 2024. The comments raise additional queries/comments. Accordingly, this Transport Note has been prepared to respond to each comment in turn.

SECTION 2 ASSESSMENT

2.1 Access

"Vehicular access to the site would be gained from 2no. existing vehicle crossovers. Drawing URM 200 titled Proposed Ground Floor shows the access points which are gated, this would not be acceptable as vehicles wanting to enter the site would be required to wait on A4020 Uxbridge Road whilst gates are being opened, causing obstruction and affecting the free flow of traffic to the detriment of highway safety."

Concerns would also be raised regarding the use of the 2no. existing vehicle crossovers which are shown within the Transport Note Ref VP/JN/AT/ITL16339-001a Appendix A Traffic Survey Results as 'Entrance -1 Entry/Exit' and 'Entrance -2 Entry/Exit'. Having each access serving both as an 'Entry/Exit' would cause conflict and confusion leading to vehicles waiting on A4020 while opposing vehicles leave, this would be to the detriment of highway safety which not be acceptable.

The applicant would therefore be required to relocate gates back from the adopted highway at A4020 Uxbridge Road with restrictions provided to ensure that vehicles may enter only through the southern crossover and exit only through the northern crossover with the means of restraint. The Highway Authority require that an amended layout shown on a revised drawing and is submitted for approval."

- 2.1.1 Site gates have been located at the site for a number of years. These are locked opened during the hours of operation of the site and each arriving/departing vehicle during the day does not need to wait on the highway for any gate operation; they can simply drive into and out of the site. If LBH consider it necessary, a suitably worded planning condition requiring gates to be locked open during the hours of operation could be applied to a permission.
- 2.1.2 In light of the observed operation of the site, the Applicant proposes a one-way operation at the site with one-way inbound and no-entry signage to be introduced on the site boundary.

2.2 Trip Generation

"The applicant has submitted a Transport Note ref VP/JN/AT/ITL16339-001a that provides a comparison of trips generated between the consented use under application 69827/APP/2021/1565 as an apartment and the existing storage use, however, this would not be acceptable. Trips generated by the proposed use as a builders merchants should be applied using TRICS to provide the type of vehicles and number of trips generated by similar sized builders merchants in similar locations for comparison."

- 2.2.1 The preferred approach given in the Transport for London Trip Generation guidance (ref: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/trip-generation>) is for site-specific surveys to be undertaken, as was the case here.

2.2.2 Notwithstanding, the use of TRICS is also a given option, applicable where sites are similar to the development in terms of location, scale, land use and car parking. However, there are no builders merchant sites contained within the TRICS database within Greater London (the most recent survey being undertaken in 2003, well beyond the eight-year period recommended by the TRICS Good Practice Guidance).

2.2.3 Even if the South-East of England is included, there is no available site since 2009. Notwithstanding, if the database is corrected to include the single site from 2009, a Travis Perkins in Margate, Kent (TRICS Site Ref: KC-01-L-01), and the full site area of the application site is applied (circa 2,170sqm), this identifies 18 movements in the AM peak hour, seven movements in the PM peak hour and 110 movements across a day. The full TRICS output including extrapolated trip rate is included at Appendix A.

2.2.4 Accordingly, even if that TRICS trip rate is applied, the temporary use generates a lower number of transport movements than the permitted use, with circa 200 fewer vehicle movements attracted to the site across a day¹. There are still respective reductions associated with the temporary use in each of the typical peak hours. It is prudent to note that a survey of the application site had a lower trip rate than TRICS and therefore in this specific location, further reductions are forecast.

2.3 Site Layout

"Concerns would also be raised regarding the site layout as shown in Drawing URM 201 titled Proposed Roof Plan which is annotated as **Site layout Indicative only** as it would not be possible to assess an 'indicative layout' for the purposes of providing highway comments on the planning application. An indicative layout would be subject to change which would be beyond the control of the LPA which could result in an increase in road danger, this would fail to concur with the London Plan (2021) Policy T4 Assessing and Mitigating Transport Impacts. A revised drawing should be submitted which should also include swept path analysis for the largest vehicle that would access the site entering and leaving.

A Delivery and Service Plan to concur with Transport for London (TfL) Delivery and Servicing Plan Guidance (2020) would be required which should be submitted for approval."

2.3.1 The Architect has provided updated drawings removing any suggestion of an indicative layout. Swept path analysis for the largest vehicle expected, a scaffolding lorry (10m length) is shown in Drawing ITL19655-GA-001 and is provided at the end of this document. This also has regard to car and cycle parking; see below.

¹ The permitted apart-hotel use anticipated 34 two-way vehicle movements in the AM peak, 20 in the PM peak and 301 across a 12-hour day (0700 – 1900)

Delivery and Servicing Plan

2.3.2 A delivery and servicing plan (DSP) has been prepared for the existing site operation and is appended at Appendix B. This reinforces entry/exit routes for the site and parking areas, etc.

2.4 Car Parking

"The Application Form states that there is no existing vehicle/cycle parking on the application site and that no vehicle/cycle parking or electric vehicle charging points (EVCPs) will be provided which would not be acceptable.

The Mayor of London adopted a new and revised London Plan in March 2021. Consequently, the car parking standards set out in the London Plan take precedence over those in the Local Development Plan. The published London Plan (2021) does not provide parking standards for commercial/industrial uses therefore parking should be provided in accordance with London Borough of Hillingdon (LBH) Local Plan Part 2: Development Management Policies Appendix C: Parking Standards which allows 2 spaces plus 1 space per 50 – 100 sqm of gross floorspace for all B class uses. Further information would be required with car parking shown on an amended plan."

2.4.1 The parking standards given in LBH Local Plan Part 2 are maximum standards and therefore there is no direct policy conflict in providing below the standards set out. Notwithstanding, the Applicant has identified two parking spaces on the revised site layout to provide some provision on-site, noting that only very few staff are permanently on-site all day.

Electric Vehicle Charging

"The application site would be required to provide 5% active 7Kw EVCPs and 5% passive EVCPs to concur with The London Plan (2021). "

2.4.2 There is a low level of parking proposed and the applicable proportions would not equate to one space. The development is also temporary in nature. Notwithstanding, the Applicant will secure the temporary installation of one electric vehicle charging point.

2.5 Cycle Parking

2.5.1 Five cycle parking spaces are shown on the revised site layout. These are located under cover and adjacent the welfare units to be located on-site.

SECTION 3 SUMMARY AND CONCLUSION

3.1 Summary

3.1.1 Aventex Properties S.A. ('Aventex') (the 'Applicant') has appointed i-Transport LLP to provide transport and highways advice with respect to an application for temporary planning permission at 15-17 Uxbridge Road, Hayes for storage of material/scaffold. The site is located within LBH, who are also the local planning and highway authority.

3.1.2 Construction for the consented hotel development has not yet commenced and the Applicant has, temporarily, let the site for the storage of materials/scaffold. This activity attracts a small number of movements to and from the site each day. LBH requested that the Applicant submit an application for temporary permission to allow use of the site for the storage of materials, with transport information provided by i-Transport (document ref: ITL19655-001a).

3.1.3 Comments on the application and the information submitted have subsequently been received from LBH Highways, dated 4th June 2024. The comments raise additional queries/comments. Accordingly, this Transport Note has been prepared to respond to each comment in turn.

3.1.4 In summary:

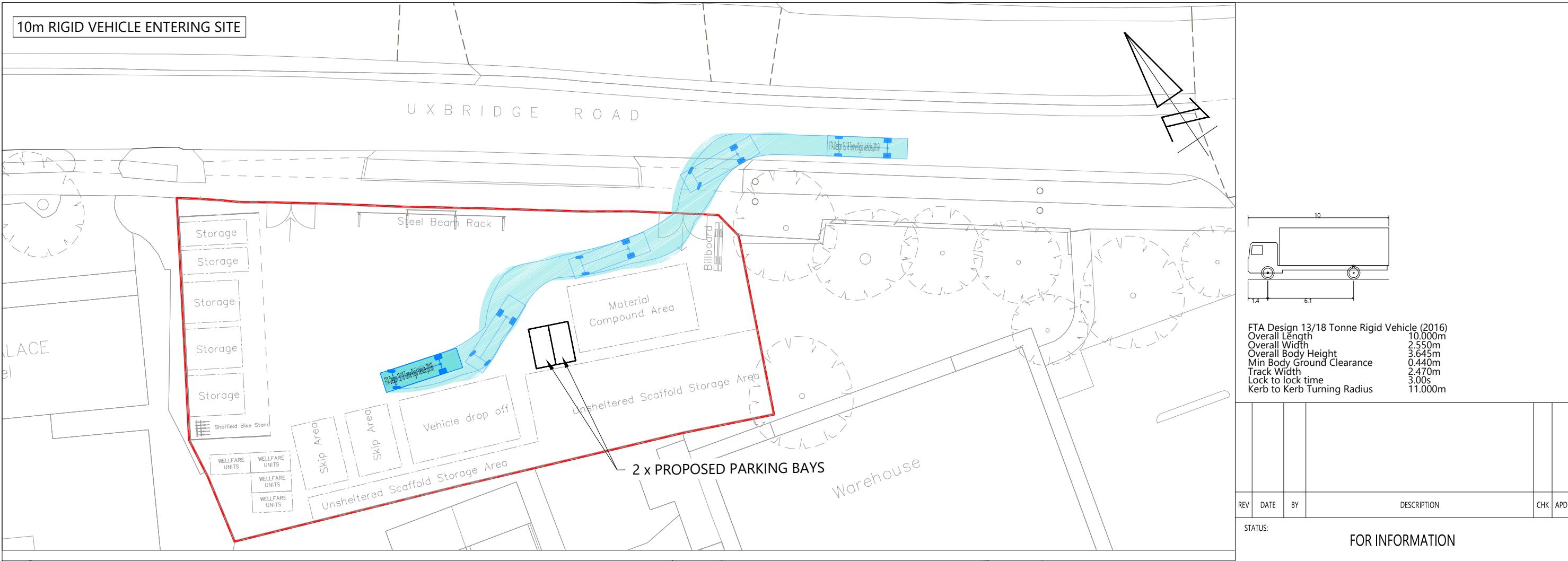
- Gates are locked opened during the hours of operation of the site and each arriving/departing vehicle during the day does not need to wait on the highway for any gate operation; they can simply drive into and out of the site. If LBH consider it necessary, a suitably worded planning condition requiring gates to be locked open during the hours of operation could be applied to a permission;
- In light of the observed operation of the site, the Applicant proposes a one-way operation at the site with one-way inbound and no-entry signage to be introduced on the site boundary;
- Whilst there are very limited applicable TRICS sites and the preference is for site-specific surveys, taking the most recent TRICs survey, located in the south-east of England, and applying it to this site still indicates the temporary use generates a lower number of transport movements than the permitted use, with circa 200 fewer vehicle movements attracted to the site across a day;
- The Architect has provided updated drawings removing any suggestion of an indicative layout. Swept path analysis for the largest vehicle expected, a scaffolding lorry (10m length) is shown in Drawing ITL19655-GA-001;

- The Applicant is willing to accept a suitably worded planning condition requiring the site submit and subsequently operate in accordance with a Delivery and Servicing Plan. This can also reinforce entry/exit routes for the site and parking areas, etc;
- The Applicant has identified two parking spaces on the revised site layout to provide some provision on-site. Given the low level of parking proposed, the applicable proportions would not equate to one electric vehicle charging point; and
- Five cycle parking spaces are shown on the revised site layout. These are located under cover and adjacent the welfare units to be located on-site.

3.2 Conclusion

3.2.1 The temporary change of use is not expected to give rise to any adverse transport impacts. Indeed, for the period of the temporary use, it can be expected that significantly less traffic will be associated with the site compared to the permitted scheme.

DRAWING



PROJECT: 10000 SERIES 19000 - Temp App - 15-17 Uxbridge Road\Tech\Acad\Transport Drawings\Working Drawings\GAI\ITL19655-GA-001.dwg

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TITLE: SWEPT PATH ANALYSIS - 10m RIGID VEHICLE		
PROJECT: 15-17 UXBRIDGE ROAD		
CLIENT:		
DRAWN:	CHECKED:	APPROVED:
MM	JN	JN
PROJECT No:	SCALE @ A3:	DATE:
ITL19655	1:500	27.06.24
DRAWING No:		REV:
ITL19655-GA-001		-

APPENDIX A. TRICS OUTPUT

Calculation Reference: AUDIT-236603-240704-0733

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 01 - RETAIL

Category : L - BUILDER'S MERCHANTS

TOTAL VEHICLES

Selected regions and areas:02 SOUTH EAST
KC KENT 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: Gross floor area
 Actual Range: 6275 to 6275 (units: sqm)
 Range Selected by User: 1390 to 6275 (units: sqm)

Parking Spaces Range: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/09 to 07/12/09

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:

Monday 1 days

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

Selected survey types:

Manual count 1 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 1

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 1

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.

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included X days - Selected
 Servicing vehicles Excluded 1 days - Selected

Secondary Filtering selection:**Use Class:**

E(a) 1 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

All Surveys Included

Population within 1 mile:

10,001 to 15,000 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:

50,001 to 75,000 1 days

*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 1 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.*Petrol filling station:Included in the survey count 0 days
Excluded from count or no filling station 1 days*This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.*Travel Plan:

No 1 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

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

LIST OF SITES relevant to selection parameters

1	KC-01-L-01 ENTERPRISE WAY MARGATE WESTWOOD Edge of Town Industrial Zone	TRAVIS PERKINS	KENT
	Total Gross floor area:	6275 sqm	
		07/12/09	<i>Survey Type: MANUAL</i>
			<i>Survey date: MONDAY</i>

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 01 - RETAIL/L - BUILDER'S MERCHANTS

TOTAL VEHICLES

Calculation factor: 100 sqm

Estimated TRIP rate value per 2170 SQM shown in shaded columns

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS				DEPARTURES				TOTALS			
	No. Days	Ave. GFA	Trip Rate	Estimated Trip Rate	No. Days	Ave. GFA	Trip Rate	Estimated Trip Rate	No. Days	Ave. GFA	Trip Rate	Estimated 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	1	6275	0.207	4.496	1	6275	0.112	2.421	1	6275	0.319	6.917
08:00 - 09:00	1	6275	0.446	9.683	1	6275	0.367	7.954	1	6275	0.813	17.637
09:00 - 10:00	1	6275	0.398	8.645	1	6275	0.414	8.991	1	6275	0.812	17.636
10:00 - 11:00	1	6275	0.191	4.150	1	6275	0.175	3.804	1	6275	0.366	7.954
11:00 - 12:00	1	6275	0.255	5.533	1	6275	0.159	3.458	1	6275	0.414	8.991
12:00 - 13:00	1	6275	0.239	5.187	1	6275	0.367	7.954	1	6275	0.606	13.141
13:00 - 14:00	1	6275	0.239	5.187	1	6275	0.303	6.571	1	6275	0.542	11.758
14:00 - 15:00	1	6275	0.175	3.804	1	6275	0.159	3.458	1	6275	0.334	7.262
15:00 - 16:00	1	6275	0.239	5.187	1	6275	0.239	5.187	1	6275	0.478	10.374
16:00 - 17:00	1	6275	0.159	3.458	1	6275	0.175	3.804	1	6275	0.334	7.262
17:00 - 18:00	1	6275	0.000	0.000	1	6275	0.064	1.383	1	6275	0.064	1.383
18:00 - 19:00												
19:00 - 20:00												
20:00 - 21:00												
21:00 - 22:00												
22:00 - 23:00												
23:00 - 24:00												
Total Rates:		2.548		55.330		2.534		54.985		5.082		110.315

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:	6275 - 6275 (units: sqm)
Survey date date range:	01/01/09 - 07/12/09
Number of weekdays (Monday-Friday):	1
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 shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

APPENDIX B. DELIVERY AND SERVICING PLAN

Technical Note – 15-17 Uxbridge Road Delivery and Servicing Plan

Project No: ITL19655
Project Title: 15-17 Uxbridge Road, Hayes
Title: Delivery and Servicing Plan
Ref: JN/ITL19655-003 DSP
Date: 10 July 2024

SECTION 1 INTRODUCTION

1.1 Overview

- 1.1.1 Aventex Properties S.A. ('Aventex') (the 'Applicant') has appointed i-Transport LLP to provide transport and highways advice with respect to an application for temporary planning permission at 15-17 Uxbridge Road, Hayes. The site is located within the London Borough of Hillingdon (LBH), who are also the local planning and highway authority.
- 1.1.1 The application site is currently let for the storage of materials/scaffold, in advance of the implementation of an apart-hotel permission (granted in 2022, planning ref: 69827/APP/2021/1565). This activity attracts a small number of movements to and from the site each day.
- 1.1.2 LBH requested that the Applicant submit an application for temporary permission to allow use of the site for the storage of materials, with transport information provided by i-Transport (document ref: ITL19655-001a). LBH has now requested the proposal include a Delivery and Servicing Plan (DSP).
- 1.1.3 As such, this DSP has been prepared by i-Transport LLP. It sets out the details of the site layout and indicative management measures to control delivery and servicing activity at the site.

1.2 Purpose

- 1.2.1 Policy T7 of the London Plan (March 2021) require developments to operate a DSP that outlines how the development facilitates safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. It recognises DSPs should be developed in a way which reflects the scale and complexities of specific developments.

1.2.2 The London Freight Plan identifies DSPs as one of four key projects for delivering freight in London more sustainably. The other three measures are the Fleet Operator Recognition Scheme (FORS), Construction Logistics Plans (CLPs) and the Freight Information Portal (FIP).

1.2.3 DSPs are intended to ensure that the operational efficiency of developments is increased by reducing delivery and servicing impacts to premises, specifically in relation to CO₂ emissions, congestion and collisions. DSPs aim to reduce delivery trips, particularly during network peak periods.

1.3 **Delivery and Servicing**

Strategy

1.3.1 As a scaffold/material storage yard, the primary movements to/from the site are light goods vehicles collecting materials. Occasionally, scaffold delivery vehicles (OGVs) make use of the site to collect or return scaffold poles, etc.

1.3.2 A survey was undertaken in December 2023 at the operational site, which identified circa 15 movements by car, circa 28 by LGV and seven by OGV across a 24 hour day.

1.3.3 Delivery and servicing vehicles are accommodated within a central yard area, with material storage and welfare facilities around the perimeter of the site.

1.3.4 Dedicated car parking is marked within the site whilst LGV/OGV vehicles are directed to park adjacent the relevant storage area to ease the transfer of materials and reduce dwell time on site.

Measures

1.3.5 Table 1.2 identifies the primary measures that will be implemented in respect of the proposed delivery and servicing activity at the site.

Table 1.2: Measures

Measure	Description	Benefit	Timescale	Responsibility
Adoption of DSP	'Buy in' from Operator is essential to ensure DSP remains an active document.	Involvement of the operator will ensure policies are fully developed and best possible results are achieved.	From occupation.	Operator
Gates	Gates to be secured open during hours of operation	Remove possibility of vehicles waiting on the public highway	From occupation.	Operator

Measure	Description	Benefit	Timescale	Responsibility
Entry/Exit	Signage to be introduced to confirm southern access is for 'in' and northern access for 'out' only	Reduce delays and limit access issues.	From occupation.	Operator
Access routes for servicing and deliveries	Ensure clear routes are maintained within the site/yard for service and delivery vehicle access.	Reduce delays and limit access issues.	From occupation.	Operator

Management

1.3.6 Initially, the applicant, is responsible for the implementation of the DSP. Subsequently, the operator will be responsible for the ongoing implementation of the DSP, who will ensure that the measures identified in this document are in place.

1.3.7 The DSP will be implemented upon occupation of the site.

Monitoring and Review

1.3.8 The DSP will apply for the same period as the temporary permission.

