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TRANSPORT TECHNICAL NOTE

BENTINCK COURT, 12-14 BENTINCK ROAD, WEST DRAYTON UB7 7RQ

Parking Study Prepared on behalf of Angelship Limited

February 2016

Reference: P1532 TN2/PC

INTRODUCTION

- 1** Crosby Transport Planning is instructed by Angelship Limited to assess the potential impact on parking levels of their development proposals at Bentinck Court, 12-14 Bentinck Road, West Drayton UB7 7RQ, within the London Borough of Hillingdon.
- 2** The application relates to a change of use from 325sqm GIA (3,500sqft) of B1(a) office space to 9 one-bed residential flats under Class O of the current Permitted Development rights (reference '*Statutory Instruments, 2015 No. 596, The Town and Country Planning (General Permitted Development) (England) order 2015*') (the GPDO). Two car parking spaces are presently located on site which are to be retained as part of the development proposals.
- 3** This report sets out the findings of on-street parking surveys which have been undertaken to assess the existing levels of on-street parking demand within the vicinity of the development. Consideration is then given to the potential impact of the development on the observed levels of on-street parking demand.

- 4 This report supplements and should be read in conjunction with the Transport Technical Note prepared by Crosby Transport Planning Limited on behalf of Angelship Limited, dated June 2015 (reference P1532 TN/PC).

EXISTING ON-STREET PARKING

- 5 Existing on-street parking occupancy levels, or 'stress', in streets surrounding the development have been assessed by undertaking manual parking surveys.
- 6 The parking surveys have been undertaken by K&M Traffic Surveys in accordance with the 'Lambeth Council Parking Survey Guidance Note'. Lambeth Council's parking survey methodology is the most established guidance document for parking studies within London.

Survey Design – Time Period

- 7 In accordance with guidance, a parking survey for a residential development in a residential area should be undertaken on weekday, overnight between 00:30hrs and 05:30hrs. This is a time period when residential parking is anticipated to be highest as residents will be at home.
- 8 Accordingly, the overnight surveys for this assessment were undertaken on the morning of Tuesday 9 February and Thursday 11 February 2016 at 03:40hrs and 04:00hrs respectively.

Survey Design – Study Area

- 9 The extent of the survey area covered within this parking assessment is shown in **Figure 1** overleaf.

- 12** The application site is located within a Controlled Parking Zone (CPZ) that is signed for use by Zone Y1 permit holders only between 09:00-18:00hrs Monday to Saturday. All streets within the study are located within the CPZ, with the exception of the short section of Heathcote Way that has no parking restrictions and is therefore included within the analysis, and the southern end of Bentinck Road which contains ten pay and display parking bays (of which five were suspended due to nearby construction works) which would not allow resident parking and so are excluded from the analysis.
- 13** The majority of all parking spaces within the study area marked for permit holders (Y1) only, with some shared permit holder and Pay and Display parking located along Bentinck Road. Three disabled parking bays are located within the study area which are excluded from the analysis for robustness. Parking elsewhere within the study area is restricted by way of single and double yellow line markings and dropped kerbs.
- 14** The numbers of parking spaces in the survey area were identified as part of the analysis. For the purposes of calculating parking stress as defined by the guidance document, it is assumed that each vehicle takes up an average kerb space of 5.0 metres. Therefore, where parking bays are not physically marked out, lengths of kerb space have been measured and split into increments of 5.0 metres, with any space short of 5.0m eliminated from the survey. All vehicle crossovers were measured on-site and eliminated from available kerb space, in accordance with guidance.

Survey Results and Analysis

- 15** The parking survey findings are presented in **Appendix A** which shows that the survey area has the capacity for a total of 179 parking spaces that could be used by residents overnight and throughout the day. All of these are available to permit holders only, with the exception of the unrestricted parking availability along Heathcote Way.
- 16** In terms of parking occupancy, or 'stress', the survey results are contained in full within Appendix A, with a summary of the results set out overleaf in Table 1.

Street Name	Tuesday 9 February 2016					Thursday 11 February 2016				
	Permit Holders		Unrestricted		% Stress	Permit Holders		Unrestricted		% Stress
	Parked	Observed Spaces	Parked	Observed Spaces		Parked	Observed Spaces	Parked	Observed Space	
Bentinck Road	20	2	-	-	90.1%	21	1	-	-	95.5%
Padcroft Road	22	7	-	-	75.9%	20	8	-	-	71.4%
Wimpole Road	36	2	-	-	94.7%	35	5	-	-	87.5%
Winnock Road	36	7	-	-	83.7%	39	5	-	-	88.6%
Tavistock Road	21	10	-	-	67.7%	22	6	-	-	78.6%
Heathcote Way	-	-	5	2	71.4%	-	-	6	0	100.0%
TOTAL	135	28	5	2	82.4%	137	25	6	0	85.1%

Table 1: Summary of Parking Stress Surveys

- 17** The overnight surveys show a total parking demand of between 140 and 143 spaces. The equivalent total stress level for the surveyed area averaged across both nights equates to 83.8%.
- 18** What constitutes a level of ‘high parking stress’ is not well defined in published guidance however stress levels of greater than 90% are typically deemed by councils to be ‘high’. It can therefore be concluded that the existing parking stress levels surrounding the application site are not high.
- 19** In accordance with the Lambeth methodology, areas where cars can legally park overnight within the study area have been noted. These are identified as single yellow lines and pay and display bays. Dropped kerbs are not included. The findings of this exercise are shown below in Table 2.

Street Name	Tuesday 9 February 2016				Thursday 11 February 2016			
	Single Yellow Lines		Pay and Display		Single Yellow Lines		Pay and Display	
	Length/ Bays	Observed Parked	Bays	Observed Parked	Length/ Bays	Observed Parked	Bays	Observed Parked
Bentinck Road	235m/ 46	4	5	0	235m/ 46	3	5	2
Padcroft Road	17.5m/ 3	0	-	-	17.5m/ 3	1	-	-
TOTAL	49	4	5	2	49	4	5	2

Table 2: Summary of Parking Stress Surveys – Legal Overnight Parking

- 20** From Table 2 it can be noted that there are an additional 54 overnight parking bays within the study area, within which six vehicles were observed parked during both study periods.

DEVELOPMENT PARKING DEMAND

- 21** To understand the scale of any potential overspill parking arising as a result of the proposed development, an assessment of the likely car ownership of future occupants has been undertaken, in accordance with advice contained within the Lambeth methodology.
- 22** To provide an indication of the likely level of car ownership for the proposed residential use, the existing car ownership levels for the local area have been reviewed using 2011 Census data obtained from the Office of National Statistics (ONS). The data provides existing levels of car ownership by habitable room for defined areas and in this case the data for the Yiewsley ward, within which the application site is located, has been reviewed.
- 23** Table 3 below contains the data derived directly from the 2011 Census.

Area	Unit Type	No. Habitable Rooms	No. H/holds	No. H/holds – No cars or van	No. H/holds – 1 car or van	No. H/holds – 2 cars or van	No. H/holds – 3 or more cars or van	Total cars owned	Average cars per dwelling
Yiewsley ward	Flat: Total Tenure	1 – 3 rooms (i.e. 1-bed unit)	1,055	469	506	74	6	672	0.64

Table 3: 2011 Car ownership census data for flats with one bedroom

- 24** Based on 2011 Census data, it can be seen that the likely level of unrestrained car ownership for the proposed residential use would be 0.64 cars per unit, equating to a total of 6 cars.

- 25 The change of use could therefore generate a demand for up to four on-street residential car parking permits. Whether such an increase would lead to a *“material increase or change in character of the traffic in the vicinity of the site”* is considered within the following section.

ON-STREET PARKING STRESS WITH DEVELOPMENT

- 26 As referenced previously, the proposed nine flats would be supported by two off-street parking spaces in keeping with the existing parking arrangements. Based on local Census data by tenure type, the development would be likely to generate a total parking demand for six car parking spaces. The parking stress levels within the surrounding area would therefore increase by four vehicles.
- 27 Based on the recent series of overnight parking demand surveys, Table 4 below summarises an updated future parking stress projection taking into account the demands generated by the proposed development scheme.

	SURVEY DAY 1			SURVEY DAY 2			AVERAGED		
	Parked	Spare	Stress	Parked	Spare	Stress	Parked	Spare	Stress
9/11 February 2016 Surveys	140	30	82.4%	143	25	85.1%	141.5	27.5	83.7%
With Proposed Development	144	26	84.7%	147	21	87.5%	145.5	23.5	86.1%

Table 4: Assessment of Potential Parking Impacts with Proposed Development

- 28 With the additional consideration of the proposed development, the level of available capacity would be reduced by four spaces, and correspondingly the level of parking stress within the local study area would increase marginally by 2.4% from 83.7% to 86.1%. Notably, there would still remain between 21 and 26 spare spaces within the study area.

ON-STREET PARKING STRESS WITH DEVELOPMENT – SENSITIVITY TEST

- 29** A previous prior approval application on the site (reference 70766/APP/2015/3981) was refused by the London Borough of Hillingdon in August 2015 for an identical scheme comprising 9 one-bed units.
- 30** Within the decision notice, the highways officer advised that there was one space on-site available for future residents and that one parking space per unit would be required based on the application of the Council's car parking standards. Consequently, this would lead to an overspill of 8 cars onto the surrounding highway network in their opinion, which the Council advised would lead to *"severe harm to the highway network"* and therefore prior approval was refused.
- 31** The highways officer made no reference to the contents of the Transport Technical Note that was submitted with the application, and this is discussed further within paragraphs 33 to 39 below. However if a likely overspill of 8 vehicles onto the surrounding highway network is considered, purely as a sensitivity test, then the results would be as shown in Table 5 below.

	SURVEY DAY 1			SURVEY DAY 2			AVERAGED		
	Parked	Spare	Stress	Parked	Spare	Stress	Parked	Spare	Stress
9/11 February 2016 Surveys	140	30	82.4%	143	25	85.1%	141.5	27.5	83.7%
With Proposed Development	148	22	87.1%	151	17	89.9%	149.5	19.5	88.5%

Table 5: Assessment of Potential Parking Impacts with Proposed Development – Sensitivity Test

- 32** It can be seen that an additional 8 cars parked within the surrounding area would result in the level of parking stress increasing from 83.7% to 88.5%. Notably, there would still remain between 17 and 22 spare spaces within the study area. Evidently, such an impact would be sufficiently modest not to cause harm to the highway network, and certainly cannot be considered to be *"severe"*.

- 33** As stated in paragraph 31, the highways officer made no reference to the Transport Technical Note that was submitted with the previous application and stated as a matter of fact that there is on parking space on site. This is a fundamentally incorrect assumption as the approved plans for the original development showed two parking spaces and the existing occupants have always used this area to park two vehicles. Whilst the manoeuvring space may not meet current design standards, it is clear that two vehicles are able to use the parking spaces and manoeuvre in and out of the spaces independently of one another. Importantly, with the change of use, the developer will market these as two spaces and they will continue to be able to be used by two vehicles.
- 34** At the time of the last site visit, both spaces were being occupied as evidenced in the photo below.



Plate 1: On-site Car Parking Spaces

- 35** Furthermore, within their consultation response for the previous prior approval application, the highways officer based the calculation of potential overspill parking on the application of borough-wide car parking standards instead of using more ward-specific car ownership data.

- 36** The application of car parking standards to calculate overspill parking is fundamentally incorrect. First, the Lambeth Methodology states *“an assessment of likely car ownership of future occupants can [then] be undertaken to understand the scale of any overspill parking”*. It does not state that local car parking standards should be used.
- 37** Secondly, the NPPF states that in terms of setting parking standards, local authorities should take into account the accessibility of the development; the type, mix and use of development; the availability of and opportunities for public transport; local car ownership levels; and an overall need to reduce the use of high-emission vehicles. The use of 2011 Census data for establishing likely car ownership by unit type and size for the specific ward within which the site lies is therefore fully supported by NPPF.
- 38** Thirdly, reference to parking standards contained within development plan policies is not appropriate for the consideration of prior approval applications. Indeed, in May 2014, the London Borough of Hillingdon lost an appeal for prior approval at Trident House, with the Inspector stating that *“although the development plan policies referred to by the council are noted, they do not demonstrate or substantiate an adverse impact in respect of transport and highway matters”*.
- 39** There is therefore clear and compelling evidence for assessing parking demand by using car ownership data, and not simply applying borough-wide parking standards. On this basis, the impact of the change of use on parking levels should clearly be assessed on the basis of 4 vehicles, and not 8 as asserted by the highways officer.
- 40** Additionally, within their consultation response for the previous prior approval application, the highways officer does not acknowledge and therefore fails to appear to give any weight to the following beneficial aspects of the scheme that are discussed within the submitted Technical Note:
- The change of use will result in a net reduction in traffic flows to and from the site;

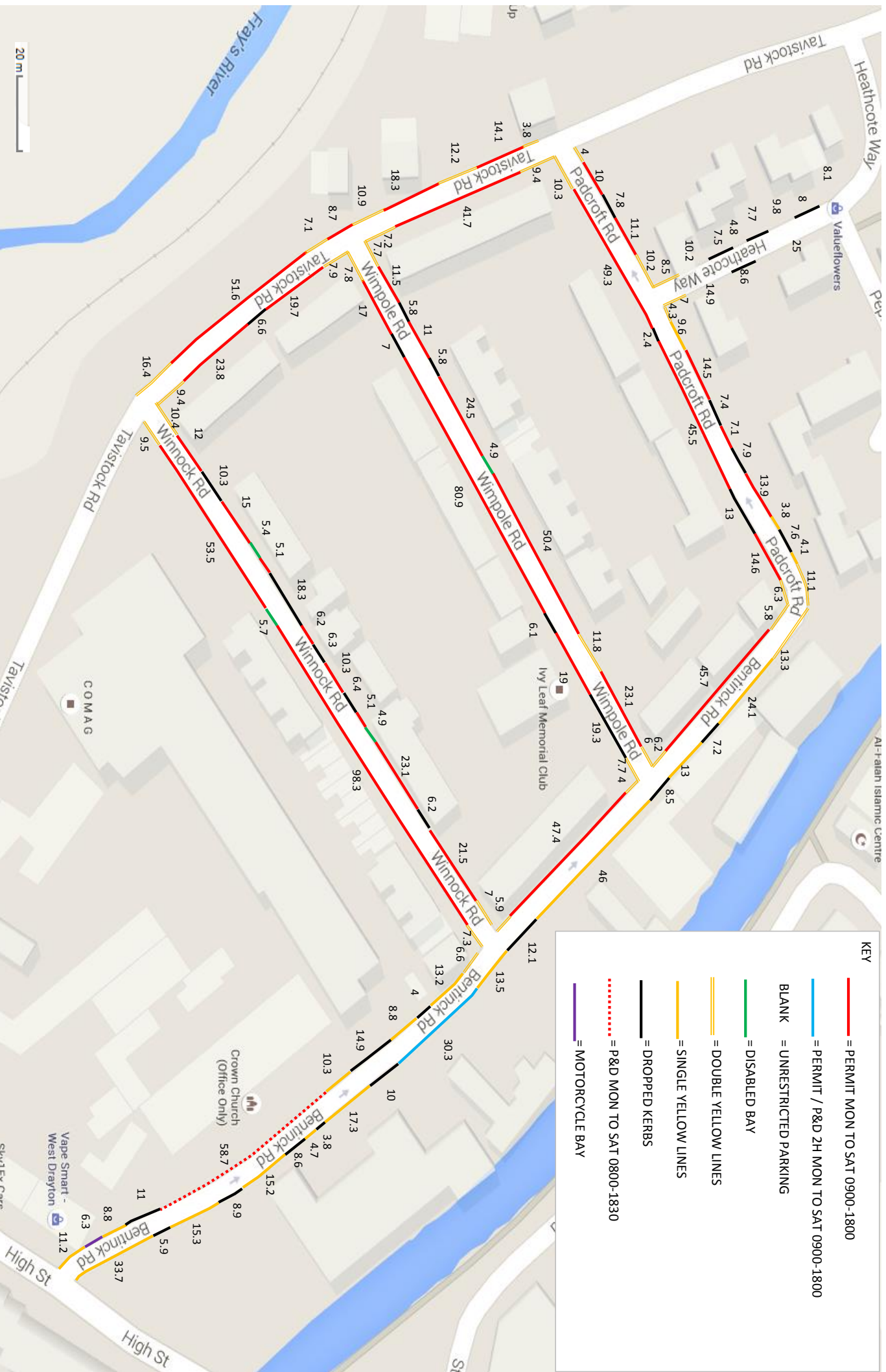
- Cycle parking will be introduced on site in accordance with local standards, to encourage cycle use; and
- The applicant's willingness to accept an appropriately-worded informative, similar to that used for nearby recent applications, stating that future residents would not be eligible to apply for on-street parking permits.

CONCLUSIONS

- 41** Having used the preferred Lambeth survey methodology to determine the existing baseline and then considered the potential additional parking demand of the proposed development, the overall parking stress within the local area would increase by just 2.4%, from 83.7% to 86.1%. The stress level would therefore continue to fall below 90% which is the threshold which is typically used to determine whether or not the parking impacts of a development are manageable.
- 42** The level of on-street parking within the area would increase by just four vehicles as a result of the change of use. Notably there would remain 21-26 spare spaces within the study area. Evidently, such an impact would be sufficiently modest not to cause harm to the highway network, and certainly cannot be considered to be "severe". It is subsequently considered that the proposed development would not have a detrimental impact on parking levels within the surrounding streets.
- 43** This report has therefore used clear empirical evidence based on established methodology to demonstrate that the proposed change of use would be entirely acceptable on parking impact grounds.

APPENDIX A:

Parking Stress Survey Results





K&M TRAFFIC SURVEYS

DATE : 9th & 11th FEBRUARY 2016

DAY : TUESDAY & THURSDAY

LOCATION: BENTINCK ROAD, WEST DRAYTON

TUESDAY 9th FEBRUARY 2016 TIME : 0340									
ROAD NAME	ZONE	RESTRICTION	METRES	5 METRES = 1 SPACE	PARKED	OBSERVED SPACES	%STREET STRESS		
PADCROFT ROAD	1	DOUBLE YELLOW LINE	14.2						
		PERMIT - MON-SAT 0900-1800	21.1	4	2	2	50.0%		
		DROPPED KERB	7.8						
	2	DOUBLE YELLOW LINE	8.5						
		UNRESTRICTED BAY	32.9	4	5	2	71.4%		
		DROPPED KERB	23.2						
HEATHCOTE WAY	3	UNRESTRICTED BAY - TOO NARROW	39.9						
		DROPPED KERB	8.6						
		DOUBLE YELLOW LINE	7						
PADCROFT ROAD	4	DOUBLE YELLOW LINE	15.4						
		SINGLE YELLOW LINE	17.5						
		PERMIT - MON-SAT 0900-1800	35.5	5	5	1	83.3%		
	5	DROPPED KERB	22.9						
		DOUBLE YELLOW LINE	13.3						
		SINGLE YELLOW LINE	182.8		4				
	6	DROPPED KERB	6.5						
		PERMIT & P&D - MON-SAT 0900-1800 2 HOURS MAX	30.3	6	5	0	100.0%		
		SINGLE YELLOW LINE	52.3						
BENTINCK ROAD	7	MOTORCYCLE BAY	6.3						
		DROPPED KERB	29.9		4	1	80.0%		
		P&D - MON-SAT 0800-1830 2 HOURS MAX	58.7	10 MARKED BAYS					
	8	DOUBLE YELLOW LINE	6.6						
		DOUBLE YELLOW LINE	16.8						
		PERMIT - MON-SAT 0900-1800	151.8	29	22	5	81.5%		
WINNOCK ROAD	9	DISABLED BAY	5.7		1	0	100.0%		
		DOUBLE YELLOW LINE	17.4						
		PERMIT - MON-SAT 0900-1800	98.3	18	14	2	87.5%		
	10	DROPPED KERB	47.5						
		DISABLED BAY	10.3	2	2	0	100.0%		
		DOUBLE YELLOW LINE	9.9						
BENTINCK ROAD	11	PERMIT - MON-SAT 0900-1800	47.4	9	9	0	100.0%		
		DOUBLE YELLOW LINE	15.5						
		DROPPED KERB	32.3		1				
	12	PERMIT - MON-SAT 0900-1800	116.9	22	17	2	89.5%		
		DOUBLE YELLOW LINE	25.5						
		PERMIT - MON-SAT 0900-1800	120.5	22	19	0	100.0%		
WIMPOLE ROAD	13	DROPPED KERB	11.6						
		DISABLED BAY	4.9	1 BAY	1	0	100.0%		
		DOUBLE YELLOW LINE	12						
BENTINCK ROAD	14	PERMIT - MON-SAT 0900-1800	45.7	9	6	2	75.0%		
		DOUBLE YELLOW LINE	16.6						
		PERMIT - MON-SAT 0900-1800	109.4	20	15	4	78.9%		
PADCROFT ROAD	15	DROPPED KERB	15.4						
		DOUBLE YELLOW LINE	16.6						
		PERMIT - MON-SAT 0900-1800	41.7	8	7	0	100.0%		
TAVISTOCK ROAD	16	DOUBLE YELLOW LINE	17.3						
		PERMIT - MON-SAT 0900-1800	43.5	7	6	2	75.0%		
		DROPPED KERB	6.6						
		DOUBLE YELLOW LINE	50.4						
		PERMIT - MON-SAT 0900-1800	92.7	16	8	8	50.0%		

THURSDAY 11th FEBRUARY 2016 TIME : 0400									
	PARKED	OBSERVED SPACES	%STREET STRESS						
	1	3	25.0%						
	6	0	100.0%						
	1								
	5	0	100.0%						
	3								
	5	0	100.0%						
	3								
	2								
	22	5	81.5%						
	1	0	100.0%						
	17	0	100.0%						
	2	0	100.0%						
	9	0	100.0%						
	7	1	87.5%						
	14	5	73.7%						
	6	1	85.7%						
	1								
	7	0	100.0%						
	9	5	64.3%						