

Nicola Taplin
Planning Department
London Borough of Hillingdon
Civic Centre, High Street
Uxbridge
UB8 1BW

5th January 2018

Your ref.:

Our ref.: 16041/1

Dear Ms Taplin,

LAND AT GARAGE BLOCK, SOUTHBOURNE GARDENS, RUISLIP, HA4 9SQ (Reference 72211/APP/2017/3911)

I refer to the highway authority response to the planning application, which reads as follows:

"This application is for the development of an existing garage block to the rear of 58-60 Southborne Gardens Ruislip. Southbourne Gardens is a local road on Council's road network and is within a controlled parking zone. There is existing parking stress in the vicinity of the site as a result of lack of on-street parking in the blocks of maisonettes adjacent to the garage block. It is likely that the garage block was originally provided to service these nearby dwellings and now car parking is dealt with by on-street facilities. The access to the existing garage block is from a narrow laneway that joins Southbourne Gardens at the junction that has poor visibility as a result of nearby landscaping and a lighting column.

The site has a PTAL value of 2 (poor) so it is likely that there will be a strong reliance on private cars for trip making. There is a Transport Assessment by Yes Engineering in support of the application. The proposals involve the provision of 6x2b flats on the site and the plans show only 6 car parking spaces on the site. The Council Policy suggests that a maximum of 1.5 spaces per unit should be provided and given the poor PTAL this maximum value is appropriate.

Reduced parking on site will result in additional parking stress on the surrounding roads at evenings and weekends even if residents are denied access to residents parking permits. A new access road is proposed which is 4.2m wide which is only suitable for two-way traffic and associated pedestrian movements in a shared surface arrangement. Any approved development would have to provide a suitable shared surface treatment. Any flat development should provide secure covered cycle parking in close proximity to dwellings on the basis of at least 2 spaces per 2 bed flats so any subsequent approval will require this facility conditioned. There are refuse/recycling facilities provided for the dwellings and in the initial proposals these are shown in an area close to the junction with Southbourne Gardens which will mean residents having a long walk with a bin.

On the basis of the above comments I have significant concerns over the current proposals in terms of the lack of on-site car parking and the impact that this will have on the parking stress in surrounding streets. I suggest the application is refused on lack of off-street car parking."

This advice is contrary to the pre-application advice given for the site where one parking space per unit was considered to be acceptable.

Parking Policy

I have set out the reasons why one parking space per unit is considered acceptable in policy terms and it would be appreciated if you could ask the highways team to reconsider their stance on this matter.

The policies referred to are as follows:

The London Plan, Spatial Development Strategy for Greater London – March 2016

The latest version of the London Plan was adopted in March 2016. The policy relating to parking is set out below.

Policy 6.13 - Parking

The maximum standards set out in Table 6.2 in the Parking Addendum to this chapter should be the basis for considering planning applications (also see policy 2.8).

In addition, developments must:

- ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles
- provide parking for disabled people in line with Table 6.2
- meet minimum cycle parking standards set out in Table 6.3
- provide for the needs of businesses for delivery and servicing.

New London Plan – Consultation Document (2017)

The proposed New London Plan, which is currently at public consultation should also be considered. The parking provision for new development is reduced from that set out in the adopted Local Plan (2016).

Hillingdon Local Plan

London Borough of Hillingdon adopted the Local Plan Part 1 setting out strategic policies in November 2012. Part 2 of the Local Plan went through a public consultation process during the latter part of 2015 and is yet to be adopted. The relevant policy relating to parking within Chapter 8 of the emerging Local Plan Part 2 is set out below.

Policy DMT 6 – Vehicle Parking

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

The Council may agree to vary these requirements when:

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

B) All car parks provided for new development will be required to contain conveniently located reserved spaces for wheelchair users and those with restricted mobility in accordance with the Council's Accessible Hillingdon SPD.

Application of Parking Standards

The parking standards for both Hillingdon and the London Plan are shown in **Table 1** below.

Table 1 – Maximum Hillingdon and London Plan Residential Car Parking Standards

Adopted Hillingdon Car Parking Standard (C3 Use)	Adopted London Plan Car Parking Standard (C3 Use)	New London Plan Car Parking Standard – Consultation Document (C3 Use)
1.5 to 1 space per unit (1-2 bed units)	Less than 1.0 per unit (1-2 bed units)	Outer London Standards PTAL 0 to 1 – Up to 1.5 spaces per unit
2 spaces per unit (3-4 bed units)	Up to 1.5 per unit (3 bed units)	PTAL 2 – Up to 1 space per unit
	Up to 2 (4+ bed units)	PTAL 3 – Up to 0.75 space per unit
		PTAL 4 – Up to 0.5 per unit
		PTAL 5 to 6 – Car free

The maximum number of parking spaces to be provided for two-bedroom units where there is a PTAL of 2 is no more than 1 space per unit. The number of spaces to be provided to accord with Hillingdon parking standards is between 6 and 9 parking spaces.

It is extremely unlikely that overspill car parking will occur on-street as the 2011 Census data reveals that less than one car is owned per household in the area. It is therefore wholly appropriate to restrict parking to 6 spaces on-site as advised at pre-application stage as further provision would encourage a higher car ownership than that, which is currently experienced in the area.

It is therefore considered that the car parking provision, 6 spaces, complies with both existing and emerging policy for this site and are also in-line with Pre-Application advice.

2011 Census Data

The 2011 Census data for the lower output area surrounding the site (referred to in Section 2.3 of the Transport Technical Note submitted with the planning application reveals that there are 516 vehicles owned by 611 households. This equates to less than one car per household (**Appendix D**).

This has been taken into consideration for the development of this site, providing more parking would only encourage unsustainable travel and clearly unnecessary given the car ownership.

Existing Use of the Garages

Bradley & Co were in charge of the management and rental of the garages for the previous landowners. They have advised that the garages were built approximately in the early 1960's and therefore are not suitable or fit for purpose to house a modern car leaving the usage instead limited for storage units only.

The garages are all empty and therefore no parking on-street will occur from the demolition of the garages.

5th January 2018

Southbourne Gardens, Ruislip - transport letter

Page 4 of 4

Conclusions

Taking the above into consideration, it is considered that the concerns raised by the Highway Authority are not valid in this instance due to car ownership levels in the area, and existing plus emerging parking policy. There will be no on-street parking resulting from the demolition of the existing garages as they are all empty, and could not be used for the parking of vehicles in any event.

The development therefore complies with parking policy and will have a negligible impact on on-street car parking. The provision is also in accordance with Pre-Application advice.

Yours sincerely



Kathryn Backhouse
Transport Director

on behalf of

YES Engineering Group Limited

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