

Elizabeth Arnold
Planning Department
London Borough of Hillingdon
Civic Centre, High Street
Uxbridge
UB8 1BW

15th April 2019

Your ref.:

Our ref.: 16041/2

Dear Ms Arnold,

LAND AT GARAGE BLOCK, SOUTHBOURNE GARDENS, RUISLIP, HA4 9SQ (Reference 72211/APP/2019/664)

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

"The application has been reviewed by the Highway Authority who are concerned that the proposal would exacerbate local parking stress, and would therefore raise highway safety concerns, contrary to policies AM2, AM7 and AM14 of the Development Plan (2012) and policies 6.3 and 6.13 of the London Plan (2016). Refusal on insufficient parking grounds is therefore recommended."

This advice is contrary to the pre-application advice given for the site for the 2017 planning application 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 – Updated Consultation Document (2018)

The proposed New London Plan, which is currently subject to an Examination in Public 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 maximum number of spaces to be provided to accord with Hillingdon parking standards is between 6 and 9 parking spaces for six two-bedroom units.

Application of the London Plan standard leads to a maximum provision of between 0-6 spaces.

It is extremely unlikely that overspill car parking will occur on-street as the 2011 Census data reveals that just four cars are likely to be owned per household in the area as the development is for flats. It is therefore wholly appropriate to restrict parking to 6 spaces on-site as advised at pre-application stage as further provision (contrary to the London Plan) 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 flats (**Appendix A**) within the lower output area surrounding the site reveals that 36% of households have no car, 49% of households have one car, and 15% of households have two cars. This equates to two households with no car, three households with one car, and one household with two cars when applied to the proposed development of six flats. It is therefore expected that five vehicles will be owned by the proposed six households.

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.

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.

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The development therefore complies with parking policy and will have a negligible impact on on-street car parking. A greater parking provision would also be in contrary to the London Plan parking standards. The provision is also in accordance with Pre-Application advice for the 2017 application. It is therefore requested that the planning application is reconsidered with respect to car parking provision.

Yours sincerely



Kathryn Backhouse
Transport Director

on behalf of

YES Engineering Group Limited

E: kbackhouse@yeseng.co.uk

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Appendix A – Census Data – Car Ownership for Flats

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

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population	All households
units	Persons
date	2011
area type	2011 super output areas - lower layer
area name	E01002419 : Hillingdon 006B
accomodation type	All categories: Accommodation type

No of Usual Residents in Households	All categories: Car or van availability	No cars or vans in household	1 car or van in household	2 or more cars or vans in household
All categories: Number of usual residents aged 17 or over in household	611	95	288	228
No usual residents aged 17 or over in household	0	0	0	0
One usual resident aged 17 or over in household	169	68	88	13
Two or more usual residents aged 17 or over in household	442	27	200	215

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

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

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population	All households
units	Persons
date	2011
area type	2011 super output areas - lower layer
area name	E01002419 : Hillingdon 006B
accomodation type	Whole house or bungalow

No of Usual Residents in Households	All categories: Car or van availability	No cars or vans in household	1 car or van in household	2 or more cars or vans in household
All categories: Number of usual residents aged 17 or over in household	467	43	217	207
No usual residents aged 17 or over in household	0	0	0	0
One usual resident aged 17 or over in household	89	31	48	10
Two or more usual residents aged 17 or over in household	378	12	169	197

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

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population	All households
units	Persons
date	2011
area type	2011 super output areas - lower layer
area name	E01002419 : Hillingdon 006B
accomodation type	Flat, maisonette, apartment, caravan or other mobile or temporary structure

No of Usual Residents in Households	All categories: Car or van availability	No cars or vans in household	1 car or van in household	2 or more cars or vans in household
All categories: Number of usual residents aged 17 or over in household	144	52	71	21
No usual residents aged 17 or over in household	0	0	0	0
One usual resident aged 17 or over in household	80	37	40	3
Two or more usual residents aged 17 or over in household	64	15	31	18

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