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CORNER OF FORE STREET AND HIGH ROAD

OBJECTION REBUTTAL

April 2023

Contents

Ref: File path P:\P2766 Corner of Fore Street and High Road Nursery Objection Rebuttal April 2023

1.0 INTRODUCTION

1.1 Paul Mew Associates is instructed by Vedaant Patel in relation to the development at Corner of Fore Street and High Road, Eastcote, Pinner, HA5 2ET.

1.2 The local planning and highway authority is London Borough of Hillingdon (LBH).

Site Location

1.3 The site is located on the corner of Fore Street and High Road. An Esso Garage is situated to the east of the site and the River Pinn to the north.

1.4 The area immediately adjoining the site mainly comprises of mainly residential dwellings situated to the south and west of the site. Coteford Infant School is located to the north west of the site.

1.5 The site is not located within controlled parking zone (CPZ).

1.6 The site has a public transport accessibility level (PTAL) rating of 1b which is a 'very poor' rating as defined by Transport for London (TfL).

1.7 There is a bus stop in proximity to the site, located on High Road. In addition Eastcote Train Station is a 12 minutes walk away.

1.8 There is a small shopping parade located approximately 150 metres north east along High Road, in addition to the local adjoining petrol station.

Existing Site

1.9 The application site currently consists of a vacant area. The site is a brownfield site.

1.10 The site is currently served by an existing, three-metre wide crossover off Fore Street.

Proposed Development

1.11 The development proposals seek to provide a nursery on site. The nursery will have places for 80 children, with a maximum 64 daily 'at any time' number. 22 childcare staff will be employed, plus three ancillary staff (totalling 25).

1.12 Ten car parking spaces are proposed, including five wheelchair accessible spaces.

1.13 A buggy and cycle store will also be provided.

1.14 There is a bus stop on High Road Eastcote. As part of the development pedestrian access will be provided directly to this.

1.15 The existing dropped kerb will be widened, from three metres to nine to facilitate vehicle movement into and out of the site.

1.16 The nursery will be open 8am – 6pm, with options for morning or afternoon sessions in addition to all day sessions.

1.17 A planning application was made on 15th February 2023 in line with the aforementioned proposal. PMA previously provided a Transport Statement (TS) for submission with the application. A number of objections have been raised, some of which are in relation to Highways.

1.18 The Highways Department has also provided comment, which has been outlined herein.

1.19 This document has been prepared to rebut the objections made.

2.0 OBJECTION REBUTTAL

2.1 This section sets out the Highways objections made and provides comment on each.

Objection 1

2.2 The following relevant extracts have been copied herein from Objection 1:

Eastcote High Road (B466) is a main artery linking traffic from the direction of Northwood Hills, coupled with those of Direction Pinner to, and from Ruislip and beyond to primary arteria' roads to the A40 / M40 and A5 / M1 . This is also a main bus route, representing the only close bus route to serve the local community and areas of Northwood Hills, Northwood, Pinner, Northwick park and Harefield Hospitals.

The report makes mention of the National planning Policy framework, NPPF, but excludes the Local LPPF, which includes more realistic means to achieve its targets from the National Framework.

Eastcote High Rd extends into Eastcote Road as an extension of the same road, where the name changes at the junction with Fore Street. Eastcote High Rd and Eastcote Road share the same highways risk analysis and should be considered one, and the same.
The kerb spaces proposed along this road would be detrimental to traffic flow, as it would restrict the width available to through traffic, at the point of a bend in this road as the names transition from one to another.
It would be realistic to expect delays, congestion, frustration, and accidents to occur at this junction. This would be in part slow movement while parents seek parking spaces with the effects of detrimental congestion at the junction for traffic in both directions.

Despite the promotion of local pedestrian traffic, it can be expected that pressure will exist on parents to travel using vehicular transport as this pick-up drop off could be seen as an intermediate stop en route to a final destination, such as work involving other premisses. The percentages of such travel have not been considered in this report.

The restriction to traffic flow on Eastcote High / Road treated as one road may be expected to require re-analysis of the risk assessment to the highway's road and at the junction. The development may impact the road infrastructure and lighting highway risk analysis to BS5480-1. The road is currently classified as a 'P' road lighting class, the additional congestion may require that the road be reclassified to a higher 'P' lighting class, and the junction incependently could quite easily be re-assessment to be elevated to a Conflict 'C' Lighting class, to adequately apply Construction , Design and Maintenance (CDM) regulatory safety requirements to this junction, as a consequence of road traffic, at peak times in late winter representing an area that requires elevated illumination. This will impact local authority safety infrastructure at the junction and beyond.

2.3 Local planning policy is covered within sections 2.2 – 2.7 of the submitted Transport Statement.

2.4 No changes to the on-street parking is proposed – these are existing parking opportunities, therefore there will be no impact to the traffic flow.

2.5 Parent drop off and pick up have been extensively assessed within the report. Chapter 4: Trip Generation and Traffic Impact outlines the expected amount of traffic generated by the development and the impact that this will have on the adjoining road network and availability in parking.

2.6 The objection goes on to state the following:

3. Parking.

The traffic parking analysis method from Lambeth is not stated or supported by guidance generally, it cannot therefore be determined that the process and limitation to an instance in 1 day (7th November 2022) and limitation to a 15min survey is acceptable or reasonable in its application in the London Borough of Hillingdon. Parking issues are prevalent along all the roads in the survey. The period of time taken for the survey was 08:45 to-09:00, most children may have already been dropped off at that point, with skewed more favourable results being reported but intrinsically inaccurate.

I suggest a more appropriate traffic time to include the parking and congestion allowing for such school drop offs and onward journey should have been foreseen and applied in the assessment. Such finding would reasonably reflect with real time consistency, The lack of available parking, the high concentration and competition for spaces that do exist, and the high % stress on the highway at such peak times compared to a normal background traffic density. The high level of traffic density and queuing traffic, at peak time extends from the Eastcote High Rd JW Fore Street beyond the proposed entrance, beyond Coteford Infant school, to a point near Coteford Junior School. Such congestion is not stated in the Transport Statement, or the impact of additional congestion caused and related to the access to the proposed development.

For this development it is reasonable to anticipate parents will consider the journey to the development as an intermediate stop, with parents travelling by car dropped early enough to allow continuation of their journey, to places of work. This is reasonable considering the general cost associated with nursery care.

The Transport statement makes no mention of other schools e.g., Coteford junior, and specialist schools incorporated within them. The proposed nursery will be in competition with the other adjacent schools for space. Sufficient regard to residents' access has already been raised as a concern to such a point that highways CCTV camera's have been installed and applied adjacent to the school entrance to seek to reduce and mitigate illegal parking and tensions between adjacent residents.

Realistically, it may be reasonable to assume parents may not have an expectation to park their cars without causing an infringement, Commonly, only one parent may typically drop off to nursery, allowing the other to ensure good timekeeping at their place of work. Due to the proximity of the main junction, width restriction and clearance required, traffic flow restrictions going through the traffic restriction, and limitation of spaces due to the proximity of other schools, it is foreseeable that tensions with residents would be expected to rise were this development to be allowed. This has the potential to create friction and unnecessary events of crime.

2.7 The Lambeth Methodology is the industry recognised standard methodology, which is accepted in Hillingdon. The client engaged in pre-application advice and

the Highways Officer specifically recommended the methodology (copied within section 1.18 of the TS).

2.8 The parking survey was not undertaken for only a period of 15 minutes - surveys carried out on a typical weekday (Monday) from 0730-0930 and 1630-1830 in snapshots of 15 minutes, as outlined within the TS within point 3.13. The busiest (peak) 15 minutes within all of these snap shot surveys was taken forward and assessed in order to outline a 'worst case' impact.

2.9 The comment states that the 08:45 – 09:00 snapshot survey has been used to skew to more favourable results. All of the results of the individual snapshot surveys can be found within Appendix D of the submitted TS.

2.10 Other schools are mentioned in the introduction and the parking surveys include all parking availability within 200 metres of the site.

2.11 The TS submitted clearly assesses the expected impact of the development on the local adjoining road network within sections 4.10 - 4.21. The peak parking beat surveyed was measured at 61%, at 08:45 – 09:00, which is not high.

Objection 2

2.12 The following relevant extracts have been copied herein from Objection 2:

2. Traffic volume. This application presents many concerns for this area which is such a pinchpoint for traffic during peak times that the mere thought of throwing into the mix a large number of extra vehicles down Fore Street is unthinkable. There is inconsistency in the application with number of attendees – is it 64 or 80? I cannot work out why the two different numbers. Maybe the 80 includes staff but surely once kitchen staff, cleaners etc are included there will be more than the 25 staff quoted. Much is made of travelling to the nursery by foot, cycle or bus. I fail to believe that, particularly, as quite rightly, the application talks of parents etc being enroute to work and so clearly would be by car. If the catchment area is going to extend out to Harefield, Harrow, South Oxhey and Woodend very clearly driving to the site will have to be the way. However in no way would anyone get here in peak times eg from Harefield in 15 minutes – this would be upwards of half an hour. The compiler of the report clearly didn't test the theory.

2.13 The TS assesses the number of expected vehicles accessing the site as part of Chapter 4: Trip Generation and Traffic Impact. The document does not suggest that parents will drive to the site from Harefield in 15 minutes.

With so many nurseries in this area it is very doubtful that staff would be found very locally (and bearing in mind the current lack in the market of such staff). This all surely means we are likely to expect the majority to travel by car. Traffic at the junction of Fore Street, Eastcote Road and High Road is mayhem at peak times and against what the application states, there are many vehicle prangs here, with much driver frustration. Very few require police/emergency attendance so not recorded but they certainly do happen. We had someone knocked off his motorbike just last week. Drivers emerging from Fore Street invariably try to filter in to the passing traffic, which is often moving faster than the bend here should be taken, and thus some not judging it very well. There is no mention in the application of queuing traffic waiting to exit Fore Street into the main road at peak times. *Attachment shows photos of examples of queuing*. With the many vehicles looking to turn into Fore Street and "drop off" or collect at the new nursery site not far from the junction I have visions of cars queueing to come into Fore Street from the main road due to the hold-up in Fore Street with cars waiting to turn into the nursery car park or waiting to emerge from it into the queuing traffic. What issues that would cause!

2.14 The TS assesses the number of expected vehicles accessing the site as part of Chapter 4: Trip Generation and Traffic Impact. Collision data has been outlined within Section 4.22. Two collisions have taken place in the last five years. The peak number of vehicle departures is expected to be 20, from 08:00 – 09:00. Broken down and spread over the hour, this equates to one departure every three minutes.

2.15 Objection 2 goes on to state:

Appendix D of the Transport Statement – parking survey results during peak times - shows average of 50 free parking spaces at all times. In practice this is nonsense.

We have concerns with:

Parking for dropping off/collecting. This is proposed to occur within the nursery parking area. Clearly this activity will involve needing to park up for a short while to go into the nursery to "deliver" the child and vice versa to collect. Thus not just a continual movement of the vehicle. Therefore with the space in the car park there cannot be room for many cars to be in there at the same time, thus much parking will be sought at the roadside.

All day/per session parking for Nursery staff. The roads around here are unable to bear all day roadside parking by nursery staff. If this were to happen then where would all the current drop off/collection parking go as, ref below, all possible spaces are taken during those times. It would be pandemonium. We do see that much is made of travel to the site by bus, cycle and foot. All day or per session roadside parking would have to be prohibited.

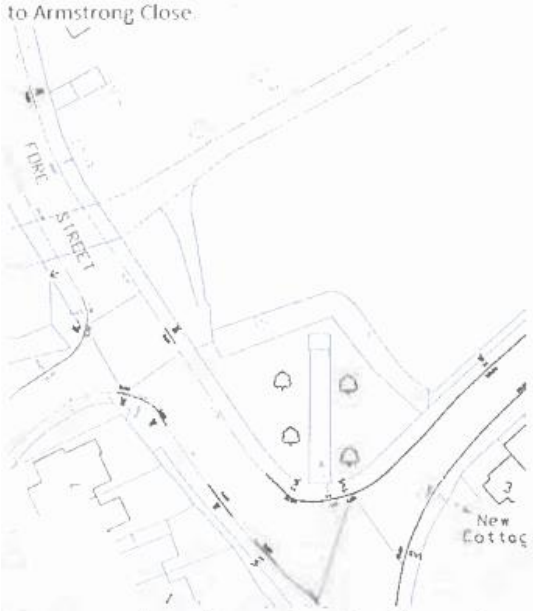
2.16 The parking survey has been undertaken in line with the prescribed methodology, accepted (and requested) in Hillingdon. The site provides space for ten parking spaces, plus space for quick drop-offs. Staff will be recruited from the local area and will be encouraged to access the site via sustainable means through measures defined within the Travel Plan in Chapter 6 of the TS.

2.17 The peak hour for arrivals for the proposed nursery is expected to be between 08:00 and 09:00, with a total of 26 arrivals in accordance with the TRICs data. The peak 15 minute parking survey beat which was recorded within this time was between 08:45 – 09:00 with a total of 63 cars parked within the unrestricted parking opportunities found within the study area. The number of expected arrivals from 08:00 – 09:00 is 26. In order to present aworst case scenario, assuming that half of the 26 arrivals (13) arrive within the peak measured beat surveys (08:45 – 09:00), three vehicles would be required to park on-street. This is due to the internal parking provision, providing space for ten vehicle internally. An additional three cars parking on-street during the peak 15 minute beat survey would increase the parking stress by 2%, from 61% to 63%. Reducing the number of on-street parking opportunities by one (due to the enlargement of the dropped kerb in order to access the site) would increase the parking stress by a further 1%, to 64%.

2.18 As has been shown throughout the analysis provided herein the proposed will not result in a parking stress anywhere near the 90% threshold that usually denotes a high parking stress. As a worst case, the greatest impact could be an increase by 3%, from 61% to 64%, during the peak morning period. This doesn't take into consideration of the drop-off area, which will likely reduce this impact.

2.19 Objection 2 goes on to further state:

At peak times any available roadside parking spaces are already taken up. It cannot be agreed that the parking spaces given as available in the Transport Survey is correct. The map given within "Figures" towards the end of the Traffic Statement shows unrestricted spaces on the roadside from the Fore Street junction up to Armstrong Close.

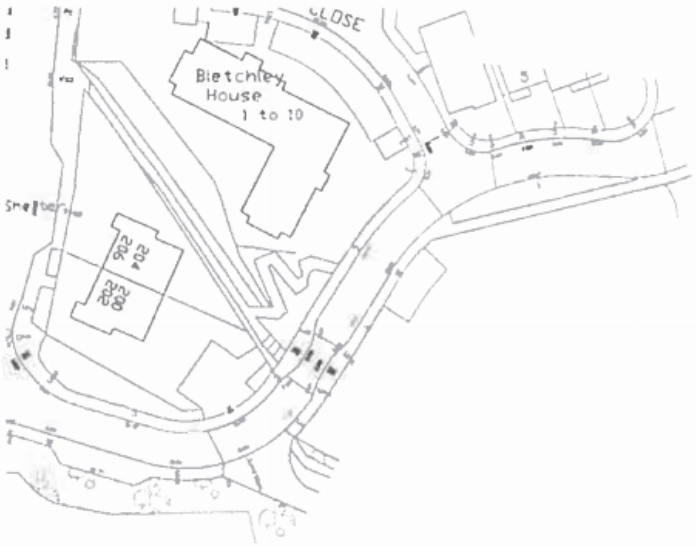


There cannot be parking on that side of the road as well as Pretty Corner side due to restricting width of road and thus cars able to pass in both directions. No-one parks on that side, during peak times and indeed very rarely ever. There has to be free-flow ability for traffic turning into Fore Street from Eastcote Road /High Road Eastcote otherwise there will be further traffic hold-ups in the main road. The unrestricted parking spaces in Fore Street are shown right up to Wentworth Drive – a great distance from the nursery. Cannot imagine those dropping off will want to park at such a distance. IF spaces are to be found there those dropping off for the existing 2 nurseries, Infants School, Junior School and Grangewood would take those up. There is the width restriction at the bridge in Fore Street just beyond the site so parking at the point is not possible.

2.20 Peak parking surveys have been undertaken which have indicated that all roadside parking opportunities are not already taken up. The surveys are undertaken in line with the Methodology. This includes a 200m walking distance from the site. The width restrictions on the bridge has been considered and is not included within the unrestricted parking count – it has been considered unsuitable.

2.21 Objection 2 goes on to further state:

sides where two-way traffic is impossible causing hold-ups and frustration. Mount Park Avenue, Armstrong Close are full with drop-off/collection parking. *Please see attachment with photo examples of parking and traffic* Parking availability in Lidgould Grove is mentioned.



There are 3 (inset) parking spaces there which are invariably occupied by Pembroke Park etc residents. Parking is indicated as available on the opposite side of the road – parking on that side pushes all traffic into the right-hand lane to enter the Park and so causes issue with vehicles wanting to emerge from Pembroke Park. Therefore should not be seen as roadside for parking. The rest of the spaces numbered there are actually in Flowers Avenue in Pembroke Park which has narrow roadways and is not suitable for non-resident parking activity. To suggest parking in Spring Drive, off High Road Eastcote is a nonsense – this is a short, narrow cul-de-sac. Turning within Spring Drive is very difficult and turning into and emerging out of Spring Drive into the heavy main road traffic is problematic.

2.22 The carriageway along Lidgould Grove is unrestricted and has therefore been assessed as such, in line with the methodology. Parking in the same manner as this takes place further along Flower Avenue.

2.23 Objection 2 goes on further:

5. Nursery times

It is stated the facility will be open 8am-6pm. In practice I suspect the majority of attendees will not stay beyond the 3 or 3.30pm times and thus will add to the peak school times chaos.

Not only do we have the schools/nurseries in Fore Street but we also have traffic and pedestrians down Fore Street from Haydon School. The pavements are very busy!

2.24 Vehicle departures are outlined within Table 4 of the TS submitted with the application. The peak evening hours are expected to be 15:00 – 16:00 and 17:00 – 18:00, with 19 vehicle departures each.

6. Bus Stop

The bus stop referred to in High Road Eastcote serves the H13. This is a single deck bus which generally runs every 20 minutes. It does not run through Eastcote town centre. It cannot be considered to be sufficient to serve the numbers mooted.

The bus stop itself is located on a narrow pavement. As it is now, when people stand waiting for the bus this restricts the space for pedestrians and pushes them to near to the edge of the pavement – in such a dangerous main road this is most concerning with the many large hgv's zooming past. It is actually quite frightening when walking on that narrow pavement. If the bus stop were to have a shelter and accommodate many people with children and buggies it would have to be set back into the nursery site rather than on the pavement. We have people in motorised buggies using the bus and going by on the pavement (mainly residents of Grooms Drive) and they must have ample space.

2.25 As part of the proposals, a new walkway directly from the bus stop to the site is proposed. The proposals will also provide a setback bus stop, which will increase the available pedestrian width for those passing the stop. Please refer to the proposed plans. Improvements to the bus stop are proposed, which will benefit all.

Objection 3 – Eastcotes Residents Association

2.26 Highways reasons for objection have been copied herein for ease of reference:

The Eastcote Road, High Road and Fore Street junction is a dangerous one due to the very heavy volumes of traffic at many times of the day, most of which coincide with the dropping off and collection of children from the many existing nurseries and schools, not just in Fore Street but in the vicinity, which add to the general commuter and other traffic (see attached table of these nursery and school facilities).
It is not over dramatic to say that, at these times, it is already chaos in Fore Street itself with both residents and 'drop off/pick-up' cars parked on either side in many places, creating only a single lane for cars trying to move both up and down the road. Traffic on the main roads is at best very slow moving as well.

This application shows the vehicle entrance to the site being on the right at the bottom of Fore Street – any vehicle turning into Fore Street from the main road will then almost immediately be turning right again, possibly having to wait because of traffic on [redacted] queuing to exit Fore Street and blocking the site entrance. This seems to be a recipe for further traffic congestion and a greater risk of accidents, as cars will inevitably [redacted] queue back out onto the main road before being able to make the turn into the nursery site.

To facilitate drop offs and pick-ups, cars already park in all the side roads feeding into Fore Street as well, creating further stress from vehicles turning in and out of these roads and often turning round in them or on Fore Street itself.

I have personal experience of trying to navigate this area. I live on Field End Road, 0.3 of a mile away from the Coteford Infants entrance – last week I timed a morning journey before 9.00 am - it took me 18 minutes, to reach the school, and this was after I had waited to turn right onto Field End Road from my house!

Furthermore, it is not just the roads that are congested – the pavements are too with adults, children and buggies.

The proposed 9 metre crossover is a huge chunk of pavement for pedestrians to cross (particularly with children and buggies) over which they have to watch out for vehicles turning in from the road and those exiting the site, possibly simultaneously.

Again, using personal experience, on the pedestrian front, the walk from the site to Eastcote Station takes +/-20minutes and not the 12 mentioned by the applicant.

The site layout drawing shows the Bus stop with a (new) shelter recessed into the application site, which it would definitely need to be as the pavement there is very narrow – one or two people standing at the bus stop now, particularly with any buggies, block the way (the first photo in the attached photo document shows this situation). What is not shown in the application drawing is the fact that, along the stretch of the pavement between the bus stop and the corner of Fore Street, there is a lamp post, a telegraph pole for an overhead telephone cable and the street sign pointing to Spring Drive.

I am aware that, along with the ECP, others have submitted objections which provide considerable detail on these issues. The above is therefore only an overview of these. However, in support of all the concerns that are being expressed, attached are a series of photos showing the situation in the morning. I am aware that at least one resident has provided photos of the afternoon. Together we are offering evidence of the reality on the ground on a daily basis each weekday.

2.27 The number of parking opportunities at peak times have been assessed as part of the submitted TS.

2.28 The proposed dropped kerb access is roughly in the same place as the existing dropped kerb, around 40 metres from the junction with High Road Eastcote. Detailed design will be confirmed at a later stage, however the safety of pedestrians, especially those with buggies will be prioritised.

2.29 As previously mentioned, the bus stop is proposed to be set back, allowing for additional width on the pavement.

Objection 4 – Eastcotes Residents Association

2.30 Highways reasons for objection have been copied herein for ease of reference:

Parking and Bus Stop

This area has a low PTAL of 1b. Only 10 spaces are available on site, this means there will be high demand for on road parking.

The entrance is situated near to the bridge over the Pinn where the road is narrow. The junction with Fore Street and the High Road is exceptionally busy, there a four schools in the vicinity. Bishop Ramsey High School, Coteford Infant & Nursery, Coteford Junior and Grangewood Special Needs School which is to be enlarged in the coming months.

Both Fore Street and the High Road are the original village byways therefore, are narrow and winding. The surrounding streets were also built when vehicle ownership was a rarity rather than the norm, so are also narrow. Extra parking either short or long term is not appropriate.

There is only one nearby bus service which is single deck.

The proposed re-location of the bus stop is not adequate. The footpath, like the road is narrow. This path is used frequently by the residents of Grooms Drive, off Fore Street, to access the local shopping parade. Most of the residents require a motorised wheelchair.

With the current location and the narrow footpath, finding room to pass along this path when there is a queue for the bus is difficult. This problem will be enhanced should there be buggies taking up pavement space as well.

The bus stop and the queueing area should all be situated off the footpath on the proposed nursery land.

2.31 The demand for parking on-street will not be high. Parking demand on-street has been assessed and as a worst case an additional three cars will need to park on local on-street unrestricted parking opportunities during the AM peak.

2.32 No changes to the road geometry are proposed.

2.33 As previously mentioned, the bus stop is proposed to be set back, allowing for additional width on the pavement. Refer to the proposed drawings.

Objection 5

2.34 Highways reasons for objection have been copied on the following page for ease of reference:

Traffic, Parking & Transport

There are already 3 schools, one with an included nursery class and a separate nursery located along the length of Fore Street and at school times, especially in the early morning from 8.15 a.m. it is extremely difficult to exit Sutton Close/Mount Park Road onto Fore Street and then onwards to Eastcote/Ruislip along Eastcote High Road or Eastcote Road. Indeed many of the local residents who need to use their cars do not wish to have early morning doctor or hospital appointments because of the difficulty to get to the High Road and the fear of not getting to their destinations in time.

Traffic is already heavy along this main route at the morning and afternoon peak times, plus there is the additional traffic for access to Bishop Ramsay school adjacent to the Highgrove Leisure Centre. It is hardly feasible that parents will be dropping off their children by any other means than by car as the nursery will be an interim stop on their way to their place of work. More traffic, more pollution.

Parking spaces are already limited on Fore Street and Mount Park Road as it is, and the proposed widening of the entrance to the proposed Nursery will remove further spaces and in addition the turn into the "drop off" zone will be very tight after going through the width restriction or approaching from the High Road.

It is stated that staff/parents will be encouraged to use public transport – one single decker bus every 20 minutes, already used by pupils of Bishop Ramsay school. How many baby buggies will be able to access the bus ?

2.35 Drop offs for the nursery will likely be made as part of a linked trip, as stated within the TS. The number of arrivals and departures in addition to the baseline parking opportunities locally has been assessed in the TS, submitted as part of the application.

2.36 The number of spaces which are expected to be lost due to the widening of the dropped kerb is one parking opportunity. This will likely fall into daily fluctuations. Drop offs will take place within the site.

2.37 Public Transport opportunities are outlined within the document, including the benefits to the local bus stop.

Additional Comments

2.38 In addition to the comments outlined herein, additional shorter comments have been made. These comments make a similar comment to those stated herein, objecting on aspects including parking.

2.39 As previously stated and as outlined with the TS submitted as part of the application, parking beat surveys have been undertaken in line with the requested methodology from Hillingdon Highways. The results indicate that

parking stress is not currently high and the impact of the proposals will not push the stress to a level typically considered as 'high' parking stress.

Highways Comments

2.40 The Highways Officer (Joshua O'Donnell) provided comment on 8th March 2023. The comment has been copied herein for ease of reference:

An application has been received seeking planning permission to erect a new day nursery/pre-school, which will provide childcare and education for children aged 0-4 years (Sui Generis Use). The development will provide 10no. parking space on-site, with 5no. be allocated as disabled bays. 25no. cycle space on-site will be provided, with 15no. in a 2-tier shelter and 10no. located within a covered Sheffield stand. Although no information has been submitted on the provision of electric vehicle charging points. The proposal will seek to employ 22no. childcare staff and an extra 3no. ancillary staff totalling to 25no. The nursery will cater for a maximum capacity of 80no. places for children, with a daily maximum of 64no. at any given time. The nursery will operate from 08:00 – 18:00 with staggered collection times, though the days of working have not been given. Children will either be at the site nursery for either a half or full day, it is unlikely that all children will be attending at the same time. The location is currently a brownfield site with a single point of vehicle access, which is to be retained and altered for this development. Further along Fore Street from the site is another Coteford Nursery which is attached to Coteford Infant School. Near the site on Fore Street are vehicle width restrictions. the area is dominated by a local high street and a high presence in residential streets. In the vicinity of the site, there are no parking restrictions. Vehicles on Fore Street are limited to a speed of 20mph and on High Street 30mph. Trip degeneration and a parking survey have been provided for this proposal. The proposal includes information on the creation of a new bus shelter on High Street adjacent to the pedestrian access where the existing bus stop is. The proposal site has a PTAL rating of 1b indicating that its access to public transport is poor when compared to London as a whole suggesting that there will be a strong reliance on the private car for trip-making. Eastcote station is only a c.19min walk, c.6min bike ride and c.11min bus ride away, although Ruislip Manor station is closer and takes less time to travel to via the same modes.

The site would include provision for 10no. on-site car parking spaces located within a newly created car park. However, it has not been specified the number of which spaces that will be occupied by staff vehicles and what number will be made available to parents for the purposes of dropping off/picking up their children during the AM and PM peaks. Furthermore, the Transport Assessment makes reference to there being space for vehicles to park outside of the marked bays, although no number has been given on how many extra vehicles can be accommodated without them blocking in vehicles within the marked bays. Taking into account that the site has limited access to public transport with only being supported by a single local bus route and a PTAL ranking of just 1b, it is considered likely that parents/guardians would pick up/drop off children by parking along Fore Street, some people may pull up on-street as close as possible to the site. While others may resort to parking injudiciously so they too can be as close to the Nursery as possible. This behaviour would result in an increase in parking stress, present a risk to road safety, impede the free flow of traffic, and detract from residential amenities. The development is therefore contrary to the published London Plan 2021 Policy T2 Healthy Streets which states that development proposals should '*reduce the dominance of vehicles on London's streets whether stationary or moving*' and Policy T4 Assessing

and mitigating transport impacts states that '*Development proposals should not increase road danger*'.

It is understood by the Highway Authority that a parking survey was carried out by the developers. Nevertheless, it is found that the survey is incredibly limited due to data only being collected for a single day and does give a full indication of local parking stress.

As mentioned above the proposal has not made any mention of providing electric vehicle charging points for the 10no. on-site parking spaces. For a development of this type to be within policy at 1no. active and 1no. passive would need to be provided. Therefore, this development contradicts the published London Borough of Hillingdon Local Plan Part 2 Development Management Policies which states that '*parking for electric should be provided at a current minimum of 5% of car parking spaces with 5% passive provision to meet the Mayor's targets*'.

As previously stated, the development will be providing 25 on-site cycle spaces for staff and students. For a development of this type to be within policy at least 1 space per 8 FTE staff plus 1 space per 8 students, which equates to 11no. for long and short stay. Therefore, this is in accordance with the published London Plan 2021 Policy T5 Cycle.

There are highway objections to this proposal because it is not in accordance with the published London Plan 2021 Policies T2 Healthy Streets, T4 Assessing and mitigating transport impact and the published London Borough of Hillingdon Local Plan Part 2 Development Management Policies.

2.41 The demand for parking is outlined within Table 4 of the TS, which outlines the total demand for parking, which includes staff. TRICS data does not differentiate between the number of staff vehicles accessing the site and the number of visitor drop-offs accessing the site. During pre-application discussions the Officer stated that "*any final quantum of parking provision should take into account the anticipated maximum level of attendance by parents and staff at any one time / session.*" With regard to trip generation the Officer requested that "*Trip analysis based on the industry recognised assessment toll (TRICS – Land Use Database) should be applied".* This is what has been undertaken and the level of parking derived from this.

2.42 The drop off space can be seen within Figure 4a, as discussed within section 5.3. Figure 4a shows that the site has capacity for an addition ten typical family saloon vehicles within the site. It should be noted that this would block some of the parking spaces.

2.43 A parking stress survey has been undertaken in line with The Lambeth Methodology. An average over two surveys is typically only considered for residential schemes, when overnight surveys take place. A total of 16 x 15 minute beat surveys have taken place, on Monday 7th November, 2022, which was a typical school day. The surveys were undertaken every 15 minutes from

0730 – 0930 and 1630 – 1830. This is explained within chapter three of the submitted TS. The busiest 15 minute beat survey in the AM and PM peak were then taken forward in order to present a worst case scenario. This is the typical methodology for assessment of nurseries which has been followed in the past. Taking the average 15 minute from each of the AM and PM surveys would only decrease the overall parking stress. In summary, 16 surveys have taken place over the course of a typical school day and the peak AM and PM 15-minute beats taken forward for assessment within the report.

2.44 The Highways Officer has suggested that it is likely that parents / guardians would likely pick up / drop off children by parking on Fore Street, as close as possible to the site. Additional analysis has there been undertaken in order to provide context of the TRICs data on the parking surveys specifically looking at Fore Street only. The following table outlines the TRICs data, broken down into 15-minute segments in line with the parking survey beats. Hourly data has been quartered to apply onto the 15-minute beats. Where hourly data has been calculated through TRICS but only 30-minute segments surveyed (07:30 – 08:00 for example), the hourly TRICS total has been halved, therefore assuming that all of the hourly trips occur during the 30 minutes and therefore presenting a worst case scenario.

Table 1: TRICS Data Per 15 Minute Segments

Time	TRICS Vehicle Arrivals	TRICS Vehicle Departures	Net number of vehicles	Parking Accumulation	Parking spaces within site	Net additional parking demand on-street
07:30	4	1.2	3	3	10	-7
07:45	4	1.2	3	6	10	-4
08:00	6.5	4.8	2	7	10	-3
08:15	6.5	4.8	2	9	10	-1
08:30	6.5	4.8	2	11	10	+1
08:45	6.5	4.8	2	12	10	+2
09:00	4	2.4	2	14	10	+4
09:15	4	2.4	2	16	10	+6
16:30	2.1	4.2	-2	13	10	+3
16:45	2.1	4.2	-2	11	10	+1
17:00	1.2	3.6	-2	9	10	-1
17:15	1.2	3.6	-2	6	10	-4
17:30	1.2	3.6	-2	4	10	-6
17:45	1.2	3.6	-2	2	10	-8
18:00	0.9	1.2	0	1	10	-9
18:15	0.9	1.2	0	1	10	-9

2.45 The following Table presents the results of each of the parking survey beats on Fore Street, the expected number of additional vehicles parking on Fore Street and the subsequent impact in terms of parking stress.

Table 2. TRICS Data, Parking Survey Data and Subsequent Impact

Time	Number of cars parked on Fore Street	Number of Spaces	% Parking Stress	Net additional parking on - street	Resulting parking stress on Fore Street
07:30	11	31	35%	-7	35%
07:45	10	31	32%	-4	32%
08:00	11	31	35%	-3	35%
08:15	13	31	42%	-1	42%
08:30	14	31	45%	+1	47%
08:45	16	31	52%	+2	59%
09:00	12	31	39%	+4	51%
09:15	12	31	39%	+6	56%
16:30	12	31	39%	+3	50%
16:45	13	31	42%	+1	46%
17:00	13	31	42%	-1	42%
17:15	13	31	42%	-4	42%
17:30	13	31	42%	-6	42%
17:45	13	31	42%	-8	42%
18:00	13	31	42%	-9	42%
18:15	13	31	42%	-9	42%

2.46 Taking the information outline within the above table into consideration, the proposals are expected to have a worst case impact of an additional six vehicles on street, at 09:15, which would increase the parking stress by 17% on Fore Street, from 39% to 56%. 56% is not a high parking stress. At this point in time the parking stress on the adjoining road is particularly low at 39%. The highest parking stress overall is expected to be at 08:45 – 09:00, where the stress is anticipated to increase from 52% to 59%, which is minor. It should be reiterated that this does not take into consideration of the space provided for drop offs / pick up, which will further decrease the impact. In addition the measures outlined in the Travel Plan will decrease the impacts furthermore. In summary, the results of the TRICS analysis and Parking Survey indicate that the proposal will not result in a parking stress anywhere near the level deemed to be considered high (90%) and therefore unsafe. The highest parking stress on Fore Street has been calculated at 59%, 31% lower than the 90% threshold.

2.47 The proposals should therefore not be considered to be a risk to safety, as suggested by the Highways Officer.

2.48 E.V. charging is discussed within section 5.5 of the submitted TS. One of the ten spaces will be provided with E.V. charging, in line with policy. The policy states that 5% should be provided as active and 5% passive. In providing one of the ten spaces (10%) as active, the development is in line with policy. It is envisaged that this will be an element of which details can be conditioned as part of the approval, therefore this should not be considered a reason for refusal.

2.49 The provision of 25 cycle parking spaces is 14 spaces in addition to the minimum requirement and therefore indicates the developers commitment to encouragement of travelling to the site via sustainable means. Further means are outlined within the Travel Plan, including the improvements to the local bus stop.

2.50 The development is evidently skewed towards and will be aimed at attracting parents who are interested in bio diversity and sustainability, which will therefore lead to a less car-centric user. Car use will be actively and openly discouraged. It should be reiterated that staff will be recruited from the local area, which will also decrease the demand for staff parking. This will be encouraged through the measures stated within the Travel Plan.

2.51 The developer has also stated that they are willing to add additional provisions to the Travel Plan, if deemed necessary by the Highways Department, such as a cycle hire scheme including cargo bikes via the nursery.

3.0 SUMMARY

3.1 To summarise, the development proposals seek to provide a nursery on site. The nursery will have 80 places available, with a daily maximum of 64 children on site. 22 childcare staff will be employed, in addition to three ancillary staff members.

3.2 Ten car parking spaces are proposed, inclusive of five disabled bays. An area dedicated to drop off has also been proposed, which allows for vehicles to drop off within the site.

3.3 Parking surveys have been carried out at the expected peak operational times for the nursery which have demonstrated that there is a reserve surplus in unrestricted kerb side parking capacity on the roads adjoining the site.

3.4 In any given measured 15 minute period in the AM and PM peaks the parking stress has not been greater than 64% on the adjoining roads.

3.5 Various objections have been raised in relation to the application.

3.6 This document has outlined each of the objections and provided comment on each of the relevant points. Additional, smaller objections have been made in line with the objections outlined herein, which have been covered in response to the initial objections.

3.7 Further comments have been provided in response to the Highway Officers comments.