

Project: Beaches Yard Horton Road Yiewsley

SMA Ref: 6969/TN

Subject: Planning Application 75221/APP/2022/2968

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Stuart Michael Associates (SMA) has continually engaged with Hillingdon BC Highways on the above planning application. In early April a meeting was held with Highways in which my colleague Rhys Donoghue attended. Then a further meeting was held on 25 April in which I (David Wiseman) had a telephone conversation with Mr A. Tilly (Head of Highways Hillingdon BC) to clarify amendments to the trip generation and other outstanding highway issues.

This led to SMA preparing a Transport Assessment Addendum (TAA) dated May 2023 which responded to all Mr Tilly's concerns.

It was assumed that with the benefit of the TAA all highway issues were resolved, it was therefore a surprise to receive a copy of the Highway Consultation response dated 2 June 2023 from a different highway officer (Mr Joshua O'Donnell) raising a number of new concerns.

Before responding to these concerns I consider it important to reiterate that this site is identified in the Hillingdon Local Plan Part 2 as an allocated site suitable for general industrial and wholesale distribution.

The site is located entirely within a Strategic location (Hayes 'SIL') as identified on the Council's policy map.

The site is also fully compliant with Policy E7 of the draft London Plan that outlines schemes which intensify B1c, B2 & B8 uses within the site will be supported in principle.

Based upon the above I would have expected for Hillingdon Highways to have considered the transport/ traffic implications of all potential sites within the Hayes ('SIL') prior to any site allocation. Therefore, I am perplexed as to why Highways appear to be reluctant to support this planning application and keep raising new and additional highways concerns.

I set out our response to each of the highway points raised in the Consultee response dated 2 June 2023 below:

Highway comment: No trip generation has been provided for the site in its existing use.

SMA Response: the existing trip generation of the site was set out in the original TA and repeated in the TAA, until now no issues have been raised about the existing trip generation.

Highway comment: the size of the sites taken from the TRICS database are larger than the proposed development.

SMA Response: Again this is a new issue raised, the trip rates are robust and they have been calculated based upon the size of the proposal. SMA has followed TRICS guidance when selecting sites to ensure robust trip rates.

Highway comment: a single vehicle arriving could cause disruption to the adjacent road network.

SMA Response: This statement is outrageous, the site access is located a significant distance along the private road away from the adopted highway. The existing private road measures 6.3m and although car parking is present on the northern side of the carriageway a HGV turning right into the private road would be able to see the full distance along the private road to see if any vehicle was exiting the warehouse site. Furthermore, having seen the TRICS evidence it is clear that two HGV vehicles meeting on the private road would be unlikely given that there would be only one arrival and one departure during the peak commute hours. The daily profile is also similar.

In contrast, it is important to consider Horton Close opposite where there is significant on-street parking, a road that does not have a straight alignment and it is a road which serves a significant number of business units. Horton Close does not have sufficient width for an HGV to pass another which is what Highways are insisting for this application. There is no consistency.

Highway comment: The development would only be supported by the 350 – bus route which operates a 20minute service.

SMA Response: I do not understand the merit of this comment, all of the businesses along Horton Road are only served by the 350 bus service. This site is no different and furthermore, if the lack of bus penetration was a concern why was the HAYES SIL identified as an area suitable for strategic industrial development (see paragraph 1,5 above).

Highway comment: Electric vehicle charging points for HGV's visiting the site are to be installed in the loading bays.

SMA Response: Again this has never been raised before, I do however recognise that this would accord with the London Plan 2021 and therefore my client would be agreeable to consider this, this however could be conditioned to any planning approval and is not a reason to object to the application.

Highway comment: it is unclear how the bikes would be stacked from the submitted plans.

SMA Response: it has been agreed that the number of cycle spaces proposed is compliant with standard and the original TA confirms spaces will be secure and well located. Additional information will be submitted at the detailed design stage and again the detail can be conditioned.

Highway comment: the Highway authority consider the geometry of both the site layout and access road to be unsuitable for use by 16.5m long HGV's despite the submitted vehicle tracking drawings demonstrating that there is sufficient width.

SMA Response: it is normal practice to submit vehicle tracking drawings and if they work then the Highway Authority generally accepts this, but in this instance the highway officer hypothesises commenting on driver experience and cars parked

carelessly resulting in gridlock on the private road. Again, I would recommend that the Highway Officer undertakes a site visit of Horton Close before making such a statement, where he will witness indiscriminate parking and very little space for any large HGV to manoeuvre.

The comparison is stark, my Client is proposing a single warehouse on the private road and is being asked to significantly widen the road to provide parking, footways and a carriageway for two HGV's to pass. There is no comparison when looking at Horton Close which is a narrow road unsuitable for HGV's to pass one another with a single footway serving a number of industrial units.

Highway comment: The officer states the above could be overcome by providing a 7m wide carriageway, parking bays of 2.5m width and 1.5m footway on either side of the carriageway.

SMA Response: firstly there is no regulation requiring on street parking to be 2.5m wide, 2m width would suffice, there is already a footway provided on the northern side of the private road, this would be sufficient and to be asked to provide a footway on both sides is not necessary given the scale of the proposal. Again, I recommend Highways take a look at Horton Close where there this only one footway provided serving a significantly higher number of units than the single unit proposed here.

Despite MfS stating that 5.5m road is adequate for two HGV's to pass each other. SMA has prepared Drawing 6969.002J submitted with the TAA, shows widening of the private road to 8m This width would allow parking on one side of the carriageway and provide sufficient width for two HGV's to pass one another. This improvement is significantly better than any of the adjoining industrial estate roads such as Horton Close and Stone Close.

As you can see from the above, we have continually engaged with Highways and provided an updated TAA and drawings to address concerns only to continue to be frustrated by new and often irrational issues being raised by Highways.

The new and irrational issues can be summarised as follows:

1. No trip generation for the existing use has been provided – New issue - Untrue, it is set out in the TA and TAA
2. A single vehicle arriving could cause disruption to the adjacent road network- Irrational
3. Asked to provide a 24hr flow, without justification – this is not normal practice- Irrational
4. The site would be served only by the 350 bus service – no different to every other unit along Horton Road - Irrational
5. We have removed the turntable as Highways didn't support this – Irrational
6. Need to provide HGV charging points – New issue – However, client will support this
7. Highways accept tracking drawings provided but then comment that drivers must drive with expert precision – Irrational

8. Drivers being incorrectly aligned with the road and cars being parked carelessly – Irrational
9. The request to significantly widen the private road- no justification given the net impact assessment which has concluded (and never been disputed) that the additional vehicle movements along the private road would be negligible. So to provide widening as being sought by Highways is irrational, particularly when comparing other estate roads of the Hyes SIL.
10. We have set out in the TA that all deliveries will be pre-booked and in accordance with good practice my client would provide a Service Delivery Plan or Operational Management Plan but Highways question whether they would work- Irrational
11. The Highway Authority then suggest the width of the private road could be overcome by limiting the size of the vehicle permitted to deliver and service the site – Irrational as the smaller HGV's are of the same width.

Based upon the above, and all the previous information submitted, I would hope that Highways can now confirm they have no highway objection to this proposal. Any matter of detail can be covered by condition or included as part of a future reserved matter application.