



TfL Spatial Planning Ref: HLDN/19/294

Tim Gabbitas
WSP
-sent via email only-

Transport for London
City Planning

5 Endeavour Square
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Phone 020 7222 5600
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Dear Tim,

Re: Hillingdon Gardens (Former Master Brewer Site), Freezeland Way, LB Hillingdon – TfL pre-application advice

Thank you for taking advantage of the TfL pre-application advice service, the aim of which is to ensure that development is successful in transport terms and in accordance with the relevant current and draft London Plan policies.

This letter concerns the recent pre-application meeting, which was held to discuss the proposals for the Former Master Brewer Site, Freezeland Way in the London Borough of Hillingdon, and took place on Monday 8th July 2019. The advice in this letter is based on the Transport Assessment Scoping Report dated July 2019 supplied in advance of the meeting, discussions during the meeting as well as email correspondence with the applicant after the meeting.

The following comments are made by Transport for London (TfL) officers on a 'without prejudice' basis only. You should not interpret them as an indication of any subsequent Mayoral decision on any planning application based on the proposed scheme and these comments do not necessarily represent the views of the Greater London Authority (GLA).

General

The Transport Assessment (TA) report to be produced by the applicant as part of the planning application submission should be in line with TfL's Transport Assessment guidance available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessments>. It is expected that the applicant's TA will be produced in line with TfL's updated Healthy Streets TA guidance and include a full Active Travel Zone (ATZ) assessment.

The attendees of the pre-app meeting are listed below. Prior to the meeting, the Transport Assessment Scoping Report (dated July 2019) was circulated to attendees and formed the basis of discussions.

TfL attendees:

Joe Oakden - Assistant Planner, Spatial Planning (case officer)
Clare Seiler - Principal Planner, Spatial Planning
Michal Miklasz - Outcomes Delivery Modelling Liaison
Dan Booth - Bus Network Development
Thomas Stone - London Underground Development

Applicant attendees:

Tim Gabbitas - WSP
Sarah Hiscutt - GL Hearn
Joao Bravo da Costa - Collado Collins

Apologies:

Joseph Birdseye – TfL Principal Traffic Control Engineer

Site Location and Context

The development site is located on Freezeland Way on currently vacant brownfield land that was formerly occupied by a Master Brewer Motel and pub. The site is bound by the A40 Western Avenue to the north and Freezeland Way to the south; both of which form part of the Transport for London Road Network (TLRN). The site is further bound by Long Lane to the west and greenbelt land to the east.

Hillingdon London Underground station is located approximately 200m north-west of the site, accessed via crossing Hillingdon Circus and walking north along Long Lane. Hillingdon station is served by Metropolitan and Piccadilly line services. The site is currently served by one route, the U2 (Brunel University to Uxbridge), which runs along Long Lane. From December 2019, the site will also be served by the 278 bus route (Heathrow to Ruislip).

Consequently, the site records a Public Transport Access Level (PTAL) of 2/3, on scale of 0-6, where 6b is highest.

Development Proposals

The development proposals, as they stand, are for approximately 550 residential units, together with a small offering of commercial/retail space. It is understood that an application will be submitted in August 2019.

Planning History

The site has been subject to a number of previous applications, including proposals for a food store. The most recent application for a residential – led scheme was submitted in August 2017, subsequently amended in 2018, and was refused planning permission in February 2019.

Site Access

The existing vehicular access junction on Freezeland Way will be retained. A proposed break in the central reservation on Freezeland Way will enable access to the site from the east via a right-turn filter lane. Pedestrian and cyclists will also be able to access the site via a public realm square, located in the south-western corner of the site. This strategy is acceptable in principle to TfL, subject to relevant Stage 1 Road Safety Audits (RSA) and swept path analysis being undertaken, and any subsequent design issues being addressed. The RSA should be completed in accordance with TfL's Road Safety Audit procedure SQA-0170.

Car Parking

Car parking is proposed at a level of 0.3-0.35 spaces per residential unit. This provision is in line with draft London Plan policy T6.1 and is therefore considered acceptable. TfL would encourage the applicant to restrict car parking to as much as possible, in order to deliver the objectives of the Mayor's Transport Strategy and draft London Plan.

The majority of car parking will be located at podium level, with a small proportion on-street. The draft London Plan policy T2 Healthy Streets states that 'development proposals should reduce the dominance of vehicles on London's streets whether stationary or moving' and therefore on-street car parking should be restricted.

It is understood that at least 3% of all car parking will be designated disabled persons parking, in accordance with draft London Plan policy T6.1. In order to fully conform to this policy, it should be demonstrated on plan as part of the Parking Design and Management Plan how an additional 7% of dwellings could be provided with a designated disabled persons parking space if required in the future.

Draft London Plan policy compliant levels of Electric Vehicle Charging Points (EVCPs) will be provided, which is welcome and supported.

A total of 4 car club bays are proposed as part of the scheme, which is considered an appropriate amount. TfL would however be resistant to any increase to this number, to ensure that active travel options are not undermined. The ongoing monitoring of the usage of these bays was discussed and this should form part of the Parking Design and Management Plan.

Cycle Parking

It is understood that cycle parking will be provided in conformity with the minimum standards set out in draft London Plan policy T5, which is welcomed.

Long-stay cycle parking is proposed at ground level within each building, with the quantum in each store corresponding directly with the requirements of each block, which is considered acceptable.

It is understood that the majority of cycle parking will be in the form of two-tier racks. Where these are provided, it is recommended that they should have a mechanically or pneumatically assisted system for accessing the upper levels as many people find using these spaces difficult. The product must allow for double locking and minimum aisle widths, as set out in the London Cycle Design Standards (LCDS), must be met in order for these spaces to be usable.

The draft London Plan requires proposals to demonstrate how cycle parking will cater for larger cycles, including adapted cycles for disabled people. It is understood that at least 5% of spaces will be in the form of Sheffield stands, which is welcomed in accordance with the draft London Plan and LCDS.

End of journey facilities should also be provided for staff working in the retail and commercial units at the site, including changing rooms, maintenance facilities, lockers (at least two per three long-stay spaces recommended) and shower facilities (at least one per ten long-stay spaces recommended) in order to conform to draft London Plan policy T5 and the LCDS. Accessible facilities for disabled cyclists should also be provided.

Trip Generation and Modal Split

A trip generation assessment was provided in the pre-meeting material and the methodology was discussed at the meeting. The comparability of the sites chosen for the TRICS assessment was discussed. Following the meeting additional sites were identified and were agreed to be comparable and suitable for use in the TA.

Given the higher parking ratio at the sites selected, it was further agreed that a vehicle trip reduction should be applied. TfL recommends a 20% vehicle trip reduction is applied given that this represents a good balance between policy mode share targets and proposed car parking supply, whilst still ensuring a robust impact assessment. The redistribution of these trips was also discussed at the meeting, as the pedestrian mode share in the Transport Scoping Note seemed high. TfL suggests that London Underground and Buses should be assigned 7.5% of the reallocated trips each, whilst walking and cycling should be assigned 2.5% each. This has been presented in a revised trip generation note provided on 19 July 2019 and the proposed residential trip generation exercise is acceptable.

The Transport Scoping Note outlined that the trip generation exercise would focus solely on forecasting the residential trips. Whilst the scale of the proposed commercial and retail units may be small, TfL would still expect that the trip generation of these are assessed, to ensure the full impact of the development trips is reflected.

Public Transport Impact

Buses

The site is currently served by one bus route (U2- Brunel University to Uxbridge). The site will be served by a second bus route (278- Heathrow to Ruislip) in December 2019.

The development will generate an increase in the use of local bus services and it is expected that the applicant will contribute towards the upgrade of both the U2 and 278 to mitigate these impacts. This could take the form of extra capacity on these routes in order to improve conditions and accessibility for bus users. A total of £375,000 (£75,000 per year for 5 years) was agreed for the previous application at the site, which would pay for one additional bus journey in the AM peak. Given the increase in number of units and lower car parking ratio, which in turn has resulted in an increase in the number of bus trips generated, it is expected that an increased contribution will be sought. Based on the initial numbers presented, the contribution required could be in the region of £800,000 to £1.5m.

The final amount of site specific bus service mitigation required will be determined upon review of the TA submitted as part of the application.

London Underground (LU)

Given the proximity of the site to Hillingdon station, it is assumed all trips will start/finish here. In order to allow for full assessment of the impact of the development on London Underground services, it is expected that all LU trips will be split by direction of travel. Furthermore, a line and station capacity assessment should be included in the TA. Data required to produce such assessment can be found through the Rolling Origin and Destination Survey (RODS) available at: <https://tfl.gov.uk/info-for/open-data-users/our-open-data#on-this-page-9>.

Upon review of the information provided, TfL will determine if any mitigation against capacity will be sought.

Highway Impact Assessment and Traffic Modelling

It is understood that no changes to the highway mitigation measures attached to the previous applications on the site are proposed. This includes increasing junction capacity at Hillingdon Circus (through improvements to signal timings) and introducing a right turn filter lane from the south on Long Lane to improve access.

Extensive highway modelling was undertaken for the 2017 application. Despite an increase in the number of units, the number of vehicular trips generated by the proposals is expected to decrease, owing to a reduction in car parking on site. As such, the applicant proposes to submit the same highway models as a confirmation

that the impact of the proposed works could be accommodated with no additional mitigation.

It is expected that since the modelling was undertaken, demand in this area of the network may have changed. In order to confirm that the modelling undertaken in 2017 is still valid, the applicant should undertake baseline surveys to ensure that the network operation has not changed. The inputs in to the models should then be altered to reflect the updated baseline flows, as well as the revised trip rates from the development.

As mentioned above, the site will be served by the 278 bus route from December 2019. It is expected that this route would be run in the models in order to fully ensure that these reflect the current and future network demand.

The applicant is strongly encouraged to engage in continuous dialogue with TfL on this matter in the lead up to submission of the application to ensure the highway impact assessment is robust.

Internal Highway Proposals

The internal road layout is proposed to be a two-way loop road, to be treated as a shared-space. It should be ensured that these spaces are legible and comfortable to use for visually impaired people through the scheme design. TfL recommend that sufficient kerb upstands should be provided and surface materials should be outlined in the submission, in order to allow TfL to assess the acceptability of the proposals.

Active Travel Zone (ATZ) Assessment

The TA should include an ATZ assessment. The scope of this assessment was discussed during the meeting and agreed post-meeting. This included 7 routes to local public transport stations, educational facilities and leisure facilities. Once the key destinations have been mapped, KSI's should be added. If any clusters (1 or more killed and/or 2 or more seriously injured) along the key routes, changes should be suggested which would make the area safer using the Healthy Streets Approach. Full guidance on producing ATZ assessments can be found at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/transport-assessments>.

Walking, Cycling, Healthy Streets and Vision Zero

TfL has launched the Healthy Streets Approach, which aims to improve air quality, reduce congestion and make attractive places to live, work and do business. There are ten Healthy Streets indicators, which put people and their health at the heart of decision making, and aim to result in a more inclusive city where people choose to walk, cycle and use public transport.

The proposals include a landscaped public realm square in the south-western corner, as well as additional pedestrian routes through the green-belt land to the east of the site. The provision of these routes are welcomed, and promote walking and cycling in the vicinity of the site, in line with draft London Plan policy T2 Healthy Streets.

The proposed design changes to existing road layout should be assessed against the 10 Healthy Streets indicators using the Healthy Streets Check for Designers, in order to ensure the development delivers improvements on the existing layout.

Alongside the Healthy Streets Approach, the Mayor's Vision Zero aspiration, which aims to eliminate death or serious injury on London's roads, supports changes to our road network to improve the safety of vulnerable road users. The applicant is strongly encouraged to identify any improvements, no matter how small, in order to reduce the likelihood of an accident. TfL recently published 'Small Change, Big Impact', which highlights ways London's public spaces can be improved by small improvements. The applicant should consult such literature and think innovatively both within and outside their red line boundary on how they could make a positive contribution to local land users.

Construction

TfL will require an Outline Construction Logistics Plan (CLP) to be submitted in support of the application, written in accordance with TfL's best practice guidance which can be found at: <https://tfl.gov.uk/corporate/publications-and-reports/freight>.

This document should consider measures such as a delivery booking system, off-site fabrication, consolidation of deliveries and co-operation between construction sites in the area (including common procurement).

It is expected that the impacts of construction will be carefully managed, in order to ensure that highway operation, bus services and pedestrian movements remain unaffected during the works.

Servicing

It is understood that a bin store will be provided in each building and refuse will be collected within a 10m drag distance. Options for a consolidated system are currently being explored, close to the site entrance. Details on how the site will operate, including measures to rationalise and manage servicing activities should be included as part of a Delivery and Servicing Plan (DSP), which should be submitted as part of the upcoming application, as required by draft London Plan policy T7. Further guidance on producing DSP's can be found at: <http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf>.

Travel Planning

A framework travel plan should be produced in accordance with TfL's guidance for travel planning. The full travel plan should be secured, enforced, monitored, reviewed and funded through the S106 agreement to ensure conformity with draft London Plan policy T4.

Mayoral Community Infrastructure Levy (MCIL)

The development will be liable to Mayoral Community Infrastructure Levy 2 (MCIL2) as well as Borough CIL. MCIL2 is charged at a rate of £60/sqm for all qualifying development in Hillingdon. The applicant should ensure they are fully aware of the regulations.

Summary

This letter has set out a number of strategic issues which should be addressed as part of the forthcoming submission. If you have any queries, further questions or seek clarification, please contact the case officer Joe Oakden (020 7126 4898 or email JosephOakden@tfl.gov.uk) or myself. Please note that Joe Oakden will be leaving TfL on 23rd August 2019. If you have any queries after this time, please contact Clare Seiler (020 7027 9639 or email ClareSeiler@tfl.gov.uk).

Yours sincerely,



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Copy to: all meeting attendees, Connaire O'Sullivan – GLA Planning