

Comments on the *Campion Site Transport Assessment and Transport Plan*

By Campion Concerns, 17th July 2006, (note added 19th November 2006)

Documents reviewed:

- (1) Millard Transport Assessment: 5193/03/DL/04-06/1102 April 2006 ('TA');
- (2) Millard Travel Plan: 5193/03/DL/04-06/1103 April 2006 ('TP').

Summary

We would ask councillors and LBH planning to disregard this version of the Millard TA report and its companion the Travel Plan until the deficiencies are corrected and the assumptions and scope used are agreed.

Major points

- Vital junctions such as Church Road/ Thornbury Road are not included in the TA. Therefore the scope of the TA needs to be increased (see below).
- Many probable car trips have been excluded which need to be added to the assumptions.
- Too many crude assumptions have been made, for instance all services are within walking distance AND have capacity.
- The actual shops /services provided by Hounslow Town Centre are further than stated in the TA. Also where are the nearest swimming pool and other recreational activities?
- The actual maths carried out in the report section does not match the base data and appears to materially underestimate the actual base data provided.
- The report says the A4/Thornbury Road junction (with the development) will exceed junction capacity in peak hours, but offers no solution. To this we must now add all the missing car trips from above.
- The width of the pavement is less than 3m as stated in the report.
- The island north of Church Road, which narrows Thornbury Road, is not assessed (for safety or traffic impact). Thornbury Road narrows to just over 3m on each side at this point, which bus and cyclists are supposed to share.
- Parking: Overspill (probable number of cars minus car park spaces) alone from the site suggests more than the current car ownership of Thornbury Road. Visitor or service parking not clear on any plans.
- Even using the conservative numbers provided in this TA (with errors) the development would produce a net increase of 700 car trips per day to add to traffic and local pollution levels. No Green plan is adequate to mitigate this and the only solution would be to reduce density to be compatible with the current area.

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Misrepresentations

1. TA claims the Site to Town Centre is 1375 metres distance or 17 mins walking time (Hounslow). This is presumably the distance to the furthest eastern edge of the shopping centre (the Bingo Hall on London Road). The distribution of shops makes it perfectly clear that the great majority of trips to the shopping centre would be to visit the shops clustered around its centre (The Treaty Centre).

A basic check using independent (RAC) software calculating shortest distances gives 2300m to the middle of High Street Hounslow. Many important shops and services will be even further. This re-enforces the point that more car trips will be required than has been allowed for. This is because the TA assumption that most people will walk to the town centre is based on a walking distance 1375 metres which would not be the case for the great majority of visits since people would normally want to go to the central area of the town centre i.e. The Treaty Centre and the shops close to it.

2. For planning purposes only Hounslow Town Centre is significant (see London Plan). Therefore all other references to the 'broad way' or village shops etc are spurious. (By the way the Café in the village is closed due in part to parking problems).

3. The summary report 5.1 does not use the Peak PM trip generation number produced in the base data (74 in base data, 65 used).

4. Section 5.7 and 5.8 makes summary statements about the percentage increase caused by the development. However this understates the base data provided by a material amount (using their base data would double the impact stated). Therefore the conclusion based on the above must be materially impacted and therefore this report version is not fit for purpose.

5. No summary was provided of all the key data in one table for easy comparison. Below is a quick summary of what the Millard report or base data states in terms of numbers:

Thornbury Rd	Current	Add Development	2008 forecast	Brunel	Actual %
Am Peak 08-0900	596	669 (+73)	677	Not Included	12.1%
PM Peak 17-1800	611	685 (+74)	672 (?)	Not Included	12.1%

Note the TA 5.7 and 5.8 states the PEAK two-way increase on Thornbury Road due to development is 5% and 6%. Mathematically this statement does not correspond to the actual numbers provided. This is a major error with completely undermines the TA and TP statement documents.

6. Photographs provided. For evidence of subtle misrepresentation the A4 is shown (as well as all other junctions) to be virtually empty of any vehicles. You would have thought that a report which is most concerned about the PEAK hours would provide photographs during the peak periods.

Assumptions which appear to be used in the TA

N.B. The justification for many of the assumptions in this report is not provided. These justifications need to be explicit if the views of non-specialists, e.g. most residents, is regarded as important. At the very least we need references as to where the necessary justifications can be easily found.

1. The TA states 52 vehicles will exit site during morning peak hour. The number of units proposed is 273, which means the assumption must be that less than 20% of units will have anyone driving from the site during the peak AM hour.
2. The report assumes more than 50% of drivers will turn right from the development to London Rd rather than the A4 during peak hours. Why?
3. The report assumes 700 new car trips per day from the site (and only 10% occurring during peak AM and PM hours). Or 2.6 trips per unit per day.
4. Note Re 3. Using Census results for Osterley and Spring Grove suggests car use is 58% typical which would result in 863 new car trips per day from the site.
5. Current Parking spaces on Thornbury Road would be removed near the access point. Who pays for that? Should not these lost spaces be replaced in the new development?
6. The TA states the development will generate 700 new trips per day (or 176,000 pa).

Why not use current Census data as comparison or 863 Trips per day?

7. Parking:

Although mentioned the requirement based on currently proposed number of homes would be $1.23 \times 273 = 335$ places + visitors + services. The UDP (not checked) suggests a maximum of 299 spaces allowed. The number of parking proposed is less than either of these, which strongly suggests an overflow from the site of more than the current car ownership of Thornbury Road.

No mention is made of the parking problems caused by commuters using Osterley underground – shows lack of research or maybe they chose to ignore.

No mention of the impact of overspill onto local roads or who should pay for a local CPZ should it be required. Basically the developer, not local residents, should pay for a CPZ which would not be required without this development.

There appears to be an assumption that current free parking on Thornbury Road near the site will be removed to improve access, how many more current local parking spaces will be lost?

The developer is not offering to allow non-residents to use the development parking spaces.

Current parking outside houses in Thornbury Road or along the front of the site, which may need to be removed, has not been discussed. It is probable many houses in Thornbury Road will require off street/front garden parking in the future as a direct result of this development.

The statements do not indicate what charges will be made for parking on site. Will they be sold separately or will they be incorporated into general service charges? If it is the former many residents will choose to park off-site).

Where is the visitor and service parking? Try Homes could not answer this at the 10th July exhibition and it is not indicated in their support papers.

8. Pollution generated by the additional car trips or additional queues has not been mentioned, this may not be within scope but is important in an area which already exceeds pollution guidelines.

9. Assumption that local services such as schools and health centre will take ALL the new residents and therefore have not considered the additional trips generated when these services are full. For instance if the nearest available school place is in Feltham, this is not a walk or cycle trip.

TA Scope / Missing Important Inputs

- No Brunel Impact assumed. As it is within 500-1000 M of the Campion Site it is material. All roads between Wood Lane and Thornbury Road should have been considered and be in scope.
- No information provided on the Church Road /Thornbury Junction (when clearly a number of trips 'disappear' along Thornbury Rd – they must go somewhere).
- No information provided on the Thornbury Avenue / Thornbury Road junction. As major tailbacks already occur the impact must be considered.
- No information provided on Church Road /Osterley Road junction which will be impacted and already has a high accident rate.
- No impact assessment due to cars or HGVs turning right on a narrow each way single carriage Thornbury road into Church Road or Thornbury Ave.
- Delays to H28 bus service due to traffic queue increasing on Thornbury Rd and due to Brunel /Wood Lane.
- Width of Thornbury Road not evaluated. The reason that there are currently not many HGVs is that they cannot pass easily. This will be major issue during construction phase and road safety.
- Safety Impact on cyclists and pedestrians and school route due to increase in traffic and HGV traffic. A detailed analysis of the school route traffic island located near the junction of Thornbury and Church Road is required. Why has the pavement been damaged adjacent to the current island? This is probably because vehicles mount the pavement at this point.
- Impact of re-phasing A4 – main Artery route if required in future, TFL to advise? The report states this junction will be operating at maximum tolerances – but offers no solutions – probably because there is no alternative solution other than to reduce the density of the development.
- No mention of Fire Station located nearby and how it might be impacted.

Travel Plan Comments

- As the Travel Plan uses base data from the TA, the plan is of dubious value until the TA is corrected.
- The best way of reducing car trips is not to build so many units in a SUBurban area with a PTAL of 2 'poor' (confirmed by TFL twice).
- There is no guarantee that services such as schools and health /doctors have any spare capacity for this and Brunel development. Therefore many of the assumptions about local services are spurious.
- Doesn't explain how home delivery will be made to the furthest units and if there is enough parking and loading capacity for a number of these type of vehicles given that the assumption appears to be 10% of shopping will be delivered.
- Capacity of the local Health and school facilities is assumed to be available locally whereas this development and Brunel will increase (double?) the current demand. For instance there is already a waiting list for Thornbury Health centre. THIS SUGGESTS NO ACTUAL RESEARCH on local facilities whereas the reality is new residents (as per existing residents) will have to travel by road trips to primary or secondary school and GPs due to lack of capacity. As one resident pointed out where will females of 12-19 moving into area, go to school?
- Assumes TP will reduce new development trips by 10% - but offers no evidence of how this is achieved? Traffic overall has been increasing even while nearly 100% of homes have been provided with access to broadband. Furthermore, the fact that someone works from home may well *increase* the number of car trips they make from the site if they are providing a service which needs to be delivered at some point.
- The 'Free Travel' proposed amounts to a total of 36 return trips to London PER UNIT (not per person). It does not seem that this would change much.

Campion Concerns Summary on Millard Transport Assessment (TA) and Travel Plan and (TP):

The summary numbers are basically asking the residents to believe an overall 10-11% increase in traffic at peak times (although report stated at 5 and 6%) and no overall impact – what a surprise!

The current TA report has made a combination of misrepresentations, spurious information and possible human mistakes in calculation. The scope also does not cover the local roads impacted area and does not take into account the 366 unit approved development at Brunel (c500m from site) in terms of car trips and H28 bus impact. Also some of the important base data is unreadable due to using background colours similar to the text, this needs to be corrected so the document can be read in full.

It is stated that the A4/Thornbury Road junction would exceed ‘junction capacity’ at both peak hours (see 6.5) and that the queue will reach back to Church Road and there is no proposed action to correct this. If this is the case on the basis of underestimated numbers, it looks very likely that the ‘estimated’ queue will pass the access point of the proposed 273 new development and the cumulative effect of that to the whole area has not been considered. (Residents in Kilberry Close have advised the current queue is already often as far as Oakley Close). Therefore the summary provided in 6.10 is clearly not a justified statement.

No detailed safety analysis of various junctions, even though current school travel plan routes and current cycle routes will be affected by the increase in traffic.

No consideration of increased HGV traffic or contractor parking during construction phase. For instance a HGV ban during certain hours may be appropriate on routes used by cyclists and school walkers.

We would ask councillors and LBH planning to disregard this version of the TA report and its companion the Travel Plan until the deficiencies are corrected and the assumptions and scope used are agreed by LBH planners and that the base data is all readable.

Financial Aspects

No compensation, provided by the developer, is mentioned in the developer's TA document.

LBH should consider a legally binding financial condition to compensate for future problems arising as a direct result of the traffic impact of the development. This condition should also cover any expense not identified in the TA. For instance the TA assumes current public parking will be removed but does not provide compensation or an alternative for this. It is also likely local health and school facilities will have to be expanded (if physically possible). If there are traffic/parking consequences for these and other services which have not been identified in the TA there should be a large compensation fund which can be drawn on to deal with these outcomes (up to the point when the development has been fully occupied for a sufficient time for the final impact to be known).

There should also be compensation for residents who are obliged at considerable expense to make new parking arrangements as a direct consequence of the traffic/parking impact of the development.

Note (added 19th November 2006).

ARUP, the independent auditors (appointed by LBH) have responded after reviewing the Traffic Analysis and Travel Plan and state that the application should be stopped as the rate assumptions are too low and the wrong methodology has been used by Millard. The whole exercise needs to be done again. Campion Concerns would like to add that Church Rd, Thornbury Ave and the impact of the Brunel development, should be added to scope. Reading the current TA /TP is a waste of time.