

Mr S Hissett
Development Management
London Borough of Hounslow
Civic Centre
Lampton Road
Hounslow
TW3 4DN

24 September 2015
Ref: P/2015/2516

Dear Stephen,

RE: PLANNING APPLICATION FOR THE ERECTION OF A NEW 'ALL-THROUGH' FREE SCHOOL AT SYON LANE, ISLEWORTH.

We write further to discussions with the Local Highway Authority Officer, who has requested some additional clarification and response to local concerns associated with the above planning application.

We have therefore undertaken a review of comments received and are seeking to respond to all outstanding matters in a composite manner, we trust you find this approach useful.

1) Provide the Road Safety Audit and Designers Response for the RHL.

The Road Safety Audit and Designers Response is enclosed.

2) Provide the Amended Site Access Plan

The Amended Site Access Plan is enclosed.

3) Provide the Parking Survey

Parking Survey is enclosed.

4) Provide clarification of Table 27 in latest Technical Note

With regard to Table 27 in the latest Technical Note and specifically the figures in the right hand column these had been inserted into the wrong row and have been updated in the attached table 27 revision A.

5) Provide clarification of the table showing model split in the Travel Plan.

The School Travel Plan (reference 8571/003/08 dated 4 September 2015) sets out the proposed model split for the school in section 3 and subsequent targets for 3 and 5 years in section 7.

6) Clarification of which model split is proposed as the predicted model splits provided to date.

The School Travel Plan (reference 8571/003/08 dated 4 September 2015) sets out the proposed model split for the school in section 3 and subsequent targets for 3 and 5 years in section 7.

7) Revisit the trip generation to enable TRICS data to relate back to the local school travel information. Complete with a clear and rational explanation as to how the final figures have been

calculated, setting out assumptions and reasons why it is considered reasonable and achievable.
Have regard to accessibility of the site and trip generation at other Hounslow Schools.

The latest Technical Note examined the multimodal survey data available in the TRICS database with regard to school sites located in outer London as requested. There is only one primary school and one secondary school located in outer London, both in Barnet, which have multimodal survey data. A summary of the data was presented in Tables 22, 23, 24 and 25.

The total number of people generated from 700 primary and 700 secondary pupils was then applied to the Hounslow average travel mode split data to calculate how these people might travel having regard to the local information.

This is shown in Table 26 and as can be seen the total generation traveling by car (car/taxi plus park and stride) would be 321 in the AM period or 362 persons including car share some 25.09% of the total people in the AM period.

To allow for all the travel modes for the proposed school and the predicted level of vehicular trip generation based on the school sites with lower PTAL rates (see Tables 12, 13 and 14 from the Technical Note) Table 27 was prepared and shows the average mode splits from the Hounslow primary and secondary school Travel Plans and the existing school travel survey for reference, together with the mode split for the proposed school using the total person trip generation from the two multimodal surveys in outer London. The level of park and stride was equated to the number of vehicular trips based on the lower PTAL trip rates (Tables 12, 13) i.e. 107 primary school trips and 84 secondary trips in the morning period. In comparison the corresponding outer London vehicular trip rates were 106 and 96 two way respectively and show little difference.

The total proportion of people travelling by car (park and stride and car share) is 26.48% in comparison to 25.09%. Car share is based on the level of park and stride (13.24%) with an average of one person sharing per car. The School bus accounts for 22.52% of people. Use of public bus services is 18.55% for primary and 26.38% for secondary. These relate to the level of people using the bus at the temporary school site at London Road (16.81%) for primary and 39.52% for the Hounslow average for secondary schools.

In a similar way the level of people using the train / tube, cycling and scooting are related to the Hounslow averages and mode splits from London Road. The level of walking is related to the proportion walking to the London Road School 20.0% for primary and 20.07% for secondary and also reflects the proportion of pupils who live close to the proposed school location. From the analysis of existing pupil postcode data 20.5% live within 1.6km (1 mile) of the proposed School at Syon Lane and 23.2% within 2.0km.

The potential mode split for the proposed school has been informed from the average mode split data from seven primary and seven secondary schools in Hounslow, where current pupils live, the existing school travel survey which is based on responses from 113 younger aged primary pupils (reception, years 1 and 2) and the average vehicular trip rate data from the TRICS database for school sites in outer London. The proposed mode split also takes into account the mitigation and initiatives proposed for the School indicated in the School Travel Plan with the two main aspects being the proposed school bus and park and stride. The level of pupils travelling by car (and using the park and stride locations) is related to the vehicular trip rates obtained from the TRICS database and the school bus will assist in restraining travel by car from average levels that are currently suggested from the travel survey data for the seven primary and secondary schools in Hounslow which do not have this option.

Table 3.6.7 of the School Travel Plan summarises the proposed school mode split. In this table all pupil car trips (including taxi) are taken to fall into the park and stride mode category and a category for the school bus has been added to allow for all the travel modes for the proposed school. The predicted level of vehicular trip generation is based on the school sites in outer London (4 primary and 3 secondary) provided in Tables 17, 18 and 19 from the latest Technical Note. The total for the park and stride mode is predicted at 107 one direction (214 two way) for the primary and secondary schools and is based on half of the TRICS vehicle trip rate predictions which is 202 two way trips in the AM peak rather than the total number of arrivals (137). This is based on the assumption that the pupils travelling by car would generate an arrival and departure trip in each of the AM and PM periods. Whilst the predicted two way value of 214 is slightly above the TRICS value (202) it accounts for a small proportion of pupils sharing trips with other family members and also that some primary school trips would fall into the next time segment. Car sharing is taken as the same as the Park and Stride (an average of one person sharing per car) with the school fostering car sharing between parents and is consistent with the high level of car sharing taking place now. The level of pupils travelling by car in the travel survey at the existing school was 23% with car sharing being almost equal at 19%. The school bus accounts for 26.64% of pupils some 373 in total. The school bus has the potential for restraining travel by car and this is reflected in the proposed level. Use of public bus services is 18.50% for primary and 32.8% for secondary. These relate to the level of people using the bus at the temporary school site at London Road (16.81%) for primary and 39.52% for the Hounslow average for secondary schools. The mode share for rail and tube is fairly low at this stage but the routing of the school bus would include a drop-off / pick up at this location if feasible and would be investigated if pupils use this travel mode. It should be noted that the H91 bus (east bound) stops right outside the Osterley tube station and the westbound stop can be accessed via the adjacent subway, so pupils could use scheduled bus services. Walking is 23.5% which reflects the existing proportion of pupils living within 2km of the school at the moment (23.3%). Walking will be encouraged and it is possible that this could be increased as more pupils are admitted to the school and it becomes more established. Cycling is 4.43% which is broadly the same as the average from the Hounslow schools.

With regard to secondary schools one of the school sites in the TRICS database is for Lampton School and the vehicular trip rates and generation for this school are summarised below:-

Weekday Assessment Period	Trip Rate per Pupil		Traffic Generations for 700 Pupils		Total Trips
	Arrivals	Departures	Arrivals	Departures	
0800-0900	0.059	0.021	82	29	111
1500-1600	0.029	0.03	40	42	82
Daily	0.177	0.175	247	244	491

Table 1 - I Secondary School Vehicle Trip Rates for Lampton School and predicted generation for 700 pupils.

As can be seen these are similar to the average of the 3 secondary school sites in outer London (see Table 18).

As previously stated in the first Technical Note the pupil survey data from the travel plans is understood to be based on a 'hands-up' survey in response to the question:-

What is your USUAL mode of travel to and from school, based on the mode used most often to travel to and from school and the mode that covers the longest/most distance?

With reference to the Hounslow school Travel Plan data for pupils, if it is assumed that the pupils travelling by car would give the vehicle generation and that each pupil generates an arrival and departure trip in each of the AM and PM periods then the assumed trips for pupils would be 299 (274 + 25 Park & stride) arrivals and 299 departures a total of 598 in the AM and PM periods see Table 9 in the first Technical Note. In comparison for the morning period there are 137 arrivals and 65 departures a total of 202 trips based on the TRICS vehicular trip rate data from outer London school sites. It is considered that there are a number discrepancies in using this data to directly predict vehicular trips in this manner. Firstly the TRICS data is related to hourly periods and no distinction is made in the Hands-up survey for the time of travel or with regard to secondary schools 6th form pupils may not attend school at some times of day travelling at different times. Furthermore, with regard to primary schools some trips might occur in the next hourly time period. Also the mode category car/taxi could be over stated since siblings in another class would not know whether to respond as by car/taxi or car share. Given this background it is therefore considered that the TRICS trip rate data would be more representative for vehicular trips. Nevertheless, the mode split data has been used in conjunction with the TRICS vehicular trip rate data to inform the mode split assessment for the proposed school.

Reference to the TRICS data in Tables 17 and 18 of the latest Technical Note indicates that for primary schools in the morning (0800-0900) that the proportion of departures to arrivals is 0.514 departures per arrival trip and for secondary schools this is 0.433 departures per arrival trip. However, for the purpose of the mode split in Table 3.6.7 a ratio of 1 to 1 has been used.

- 8) Table D in Technical Note needs to be expanded to include modal split percentages for each year to see the impact of the school as it reaches capacity. Based on Appendix J in the Original TA, with updated data, provide TRICS data for the 7-8 8-9, 9-10hrs.

The attached Table E shows the vehicular trip rate profile and predicted trip generation for 700 primary and 700 secondary school pupils based on the TRICS data for the 4 primary and 3 secondary schools in outer London (see Tables 17 and 18 of the Technical Note). Also attached is Table F which shows the school vehicular traffic generation based on the phased intake of pupils for the outer London sites. The attached Table G shows the mode split for phased intake of pupils using the proposed proportions for primary and secondary school elements in Table 3.6.7.

- 9) All traffic approaching the site will be with the flow of rush hour traffic and tailbacks already extend back significantly on Syon Lane, A4 and Wood Lane.

Peak hour, classified, traffic surveys were undertaken at seven junctions local to the application site between the hours of 0700 to 0915 and 1430 to 1830 including 4 junctions on the A4 Great West Road and 3 junctions along Syon Lane. In addition Automatic Traffic Counters (ATC) were installed at 3 locations for a period of 7 days, with one on Syon Lane, one on Wood Lane and one on Jersey Road.

All of this data was captured to assess the traffic pattern on local roads and assess the potential effect on junctions on Syon Lane and the Great West Road. A summary of the data is presented in section 2.3 of the submitted Transport Assessment and Figure 10. Other queue data is included in Appendix Q of the submitted Transport Assessment.

The peak hours for the school use are considered to be 0800-0900 and 1500-1600. In this case it is acknowledged that some of the school traffic would coincide with the morning peak and therefore

the time period 0800-0900 is likely to be of more concern than 1500 -1600 given the junction peak hours and flows.

The scheme seeks to minimise additional traffic flows from the proposed school on Syon Lane and Wood Lane with use of park and stride locations, operating staggered start times for the primary and secondary school elements and providing and promoting the use of a school bus by pupils with the latter having the potential specifically to restrain travel by car.

These initiatives are included in the submitted comprehensive School Travel Plan which could be secured by condition.

The distribution of school traffic is based on the location of 185 pupils that currently attend the temporary school facility at London Road or start school in the academic year 2015/16. With regard to school traffic on the Great West Road (to the west of Thornbury Road) the analysis undertaken indicates that 43.3% of the predicted traffic would use this route with increases of 2.54% east bound and 1.94% westbound in the morning peak period and considered to be within typical daily traffic fluctuations. This is the largest proportion of traffic on the A4 route with smaller levels assigned to the east of Syon Lane because of where pupils reside.

- 10) Syon Lane and Osterley Stations are located outside the maximum walking distances from the site according to PTAL ratings.

The distance to rail and tube stations taken into account in assessing the PTAL rating is 960m (12 minute walk) and 640m (8 minute walk) to bus stops. It is acknowledged that these stations are outside of this distance, but the distances are not unreasonable for older children and escorted children to walk in comparison to the PTAL distance criterion.

The walking distance to Osterley tube station is 1.18km to the proposed pedestrian / cycle access from Wood Lane and 1.06km to Syon Lane railway station. It should also be noted that the H91 bus stops outside Osterley tube station with a stop at the Wood Lane junction.

- 11) There are only 2 bus routes serving the site, the proposal will put further pressure on these services. There is some capacity on existing bus routes, but with the introduction of a more direct bus route via the school bus proposals, the impact on existing services is likely to be low.

There is some capacity on existing bus routes, but with the introduction of the more direct school bus proposals, the impact on existing services is likely to be lower.

Predictions in the School Travel Plan indicate that 359 out of 1400 pupils might use public bus services.

These would be spread over buses travelling in both directions on the H28 service and also the H91 although the predominant direction would be west to east in the morning and east to west at the end of the school day for this high frequency service

- 12) There is no public transport along Jersey Road or Windmill Road. True, but in reasonable walking distance of the site.

This is correct although the H28 bus route does travel along Jersey Road to the west of Wood Lane. However, the length of Jersey Road (to the east of Wood Lane) is in a reasonable walking distance of the site and there are only 4 residential properties on this length of road.

The nearest residential properties on Windmill Lane are approximately 2.14km to the north. With reference to the Borough average for pupil distance to primary schools only 37% live within 0 to 800m (0 to 0.5 miles) and only 9% attending secondary school.

With regard to the current pupils attending the temporary school facility, 10.3% would be within 800m for the proposed school and 49.7% within 3.2km (2 miles). From this it can be seen that relatively few existing primary schools in Hounslow would have the majority of pupils residing within 800m and fewer still within 400m.

If a walking distance of 400m to a primary school was rigidly applied in a dense location such as LBH, then most existing schools would not comply given only 37% of pupils are within 800m. It would also mean that sufficient new schools could not be provided and the significant shortfall in places within the Borough would be further exacerbated.

- 13) The survey data provided suggests pupil car drop off rates, but the final generation is based on TRICS data. Discrepancy in consistency.

The potential mode split for the proposed school has been informed from the average model split data from seven primary and seven secondary schools in Hounslow, where current pupils live, the existing school travel survey which is based on responses from 113 younger aged primary pupils (reception, years 1 and 2) and the average vehicular trip rate data from the TRICS database for school sites in outer London.

The proposed mode split also takes into account the mitigation and initiatives proposed for the School indicated in the School Travel Plan with the two main aspects being the proposed school bus and park and stride. The level of pupils travelling by car (and using the park and stride locations) is related to the vehicular trip rates obtained from the TRICS database. The TRICS trip rate parameter is per pupil. The vehicular trip generation used in assessing the local junctions is derived from the TRICS trip rate data.

- 14) The figure for car drop off is grossly underestimated. The TRICS data varies in quality from site to site and often does not record the full drop-off demand, including park and stride, across the surrounding highway network.

The surveys within the TRICS database are of schools as stated in the TRICS data outputs. The survey methods used for surveys in the TRICS database are rigorously set by the TRICS organisation so that the data collected is robust for the purpose for which it is provided.

The database is recognised nationally and the TRICS organisation has been actively engaged in annual data collection programmes since it was first launched in 1989.

We have no reason to believe that the data collected is not robust and faithfully records the vehicular trip rates through a combination of observation and interview surveys to address pupils being dropped off outside the school grounds.

- 15) Likely number of round trip car journeys is an additional 1500 plus at least 75 coach/mini bus journeys from Osterley tube and surrounding areas. This is in addition to the 80 round trips already taking place by the SKY development.

The traffic generation of the proposed school is based on data from the TRICS database. However, even using the average travel mode data from schools in Hounslow (see Table 9 of the Technical Note), and assuming each pupil in the categories car/taxi and park and stride generate an arrival and departure trip the number would be 598 not 1500. A pupil car sharing does not give rise to a further car trip.

As stated these model splits do not take into account the initiatives proposed in the School Travel Plan, specifically the school bus. The aim of the School Travel Plan is to restrain vehicular trips and the park and stride proposals seek to manage those car borne trips that do occur so as to reduce the effect outside the school on Syon Lane and Wood Lane.

With regard to present vehicular trips accessing the Sky Campus these would have been included the traffic surveys and hence taken into account in our assessments. With regard to future proposals that have planning permission on the Sky Campus and Gillette Corner building these have been assessed in section 8.4 of the Transport Assessment and also taken into account.

- 16) Based on existing data from the London Road site, extrapolated there would be 364 car journeys just for primary use.

It should be noted that the travel survey for London Road comprised of 3 year groups Reception, and years 1 and 2 in the age range 4 to 6 with 113 respondents in the younger age groups that attend primary school. This is a relatively small sample to extrapolate the model split to 700 pupils over a wider age range. However, extrapolating the calculated mode split proportions to 700 pupils gives 365 pupils travelling by car (car inc taxi, car share and park and stride categories) but pupils car sharing do not give rise to additional car trips. The number of cars is therefore 229 (car inc taxi, and park and stride categories) not 365. Also as pupils become older their travel mode options also change and this would also effect the mode split proportions of a larger sample across the primary age range 4 to 10.

- 17) The TA does not provide any data on existing minimal on street parking availability or the existing levels of on-street parking demand.

A parking survey has been undertaken on local streets and does show some availability, the survey is enclosed.

However, in recognition of the parking situation described by local people, allegedly exacerbated by users of the Sky Campus, parking is proposed on site for staff and park and stride locations are proposed for pupils travelling by car, the use of which would be encouraged through the School Travel Plan.

- 18) The Wood Lane/A4 junction will be widely used. This is already deemed to be one of the worst junction in LBH for delays (LBH Strategic Transport Study 2012)

With regard to this junction the Transport Assessment has predicted only 31 trips travelling eastbound and 18 travelling westbound on the Great West Road with traffic on the high capacity mainline and spread over an hour in comparison to existing traffic flows of 2271 eastbound 1231 westbound.

The proportional increases are 1.36% eastbound and 1.46% westbound and were considered to be within typical daily traffic fluctuations of traffic flows at this junction.

- 19) No consideration has been given to the standard routine that parents will momentarily park on Syon Lane, surrounding areas and Wood Lane, often across people's driveways to drop off children.

Marshalling of school entrances is proposed as part of the School Travel Plan and the school is introducing a Parent Travel Charter to encourage and actively promote pupils and parents to travel sustainably to school.

The school is also promoting park and stride locations to actively discourage pupils from dropping-off / picking-up pupils from Syon Lane or Wood Lane, as well as providing the school bus. Naming and shaming parents who persistently drop-off / pick-up pupils from Syon Lane or Wood Lane is an initiative that may assist in mitigating against this activity too.

- 20) The TA does not provide sufficient detail of pedestrian facilities in the immediate area.

This has been covered by the PERS assessment, which has already been submitted.

- 21) The statutory walking distance for children under the age of 8 is a maximum of 2 miles and it is not a legitimate choice to select a location which is beyond this limit.

The legislative framework for the provision for school transport dates back to the Education Act 1944. This Act set the statutory distance over which free travel to school must be provided.

The distances set were two miles each way for children of eight years old or younger and three miles for children over the age of eight years. These distances are often known as the statutory walking distances because they are measured along the shortest route which a child could walk with reasonable safety.

Under the Education Act 1996 Local Authorities have a duty to provide free transport for all children of compulsory school age who are attending their nearest Local Authority school when this is over the statutory walking distance.

This does not imply that pupils must be within the 2 mile or 3 mile distances dependant on age.

The choice as to which school a child attends is a parents choice, if they wish to walk or travel further then this is for them to choose.

Reference to the postcode information for the pupils attending the London Road school indicate that only 23.8% would live more than 3miles from the proposed school site. It should be noted that travel on buses in London is free for children living in London.

It must be clarified that this is not proposed as a Local Authority school, but a Free School and that travel in London is free for under 16 year olds and 16-18 years olds still in full time education.

- 22) Pupils will not arrive at the school using public transport, as this has a PTAL 1b rating.

Whilst the PTAL rating is acknowledged as 1b there are bus services on Wood Lane and Great West Road which are accessible to the site. A low PTAL rating does not indicate that there is no alternative means of transport, just that it is limited. Accordingly, having regard to the limited access to alternative modes of transport, the School Travel Plan proposes alternative modes of travel, such as a school bus, to enhance the transport modes available to all pupils.

- 23) Parents of primary school children will definitely be using their cars to drive their young kids to the school, and proposed drop off points will still have to be reached by car, hence this solution will not ease traffic congestion.

The level of pupils and staff has been assessed using the nationally recognised TRICS database and are considered robust to assess the level of potential traffic generation.

The park and stride locations are proposed to assist in managing where pupils are dropped-off and picked-up and mitigate against additional traffic congestion on Syon Lane and Wood Lane.

Other measures in the School Travel Plan are aimed at restraining travel by car which includes the school bus.

- 24) Concerned about the safety of the children walking along Syon Lane with no adequate footpath facilities and very narrow pavements.

The PERS audit seeks to assess walking conditions along Syon Lane and several improvements are proposed that seek to address these points.

In response to the concerns about narrow footways the existing footway in front of the school site (circa 235m) would be widened.

With regard to the use of the Park and Stride location at Wyke Green Garden centre it is proposed that pupils would be escorted in small groups such as a 'walking bus' and would include remedial works to existing dropped crossings and tactile paving on this route, provision of dropped crossings and tactile paving at the builders merchants access and relocation of a street lighting column that restricts the footway width.

- 25) The Transport assessment does not make allowance for background traffic growth and the impact generated by these local committed developments.

The Transport Assessment has taken into account traffic growth predictions based on national accepted methods together with the traffic predictions for the school as well. It has also considered committed development that is development with planning permission, specifically related to development on the Sky Campus and Gillette building. This has taken into account predicted traffic flows along Syon Lane and is set out in section 8.4 of the submitted Transport Assessment.

- 26) Is the catchment area for Free School's larger than that associated with Local Authority Schools and if so does the catchment reduce over time.

The EFA very much support the idea of new schools being in areas of the greatest basic need for places. A free school, which is the current vehicle for new schools (apart from privately funded), is not constrained by Local Authority boundaries in terms of admissions area. However the school must comply with the Governments Admissions code as set out by the Department for Education 2013.

A parent of a pupil can request a place at their preferred school regardless of their location. This application will be considered in line with the schools admission policy

The admissions policy sets out a clear hierarchy of oversubscription criteria which includes a distance criteria. Oversubscription criteria is only applied if the school is oversubscribed for its

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planned number on roll for the year of entry, meaning that all applications are assessed in line with the policy and in accordance with the oversubscription policy contained within in. Distance is considered as a nearest first criteria as part of this oversubscription assessment. If there are spaces remaining once this has been undertaken, only then do children from further afield get considered.

If there are vacant spaces within the planned number on roll for the particular year group when all applications are in – there are no reason why an additional request for places regardless of location cannot be granted and a place for the child at the school provided

It is important to stress that Nishkam School has been oversubscribed since it opened.

I am also aware that the London Borough of Hounslow have now adopted CIL, accordingly, I enclose a completed CIL liability form. It is noted that the CIL charging schedule adopted exempts education development from any form of payment. Clarification of this matter was sought from the Council's planning policy team on the 4th August 2015, however, a formal reply is still pending.

If you require anything further, or wish to discuss the points raised, please do not hesitate to contact me.

Yours sincerely



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