



Westminster House, Richmond

Transport Statement

Client: Baden Prop Limited

i-Transport Ref: NM/LC/ITL18136-002B R

Date: 14 December 2023

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SECTION 1 INTRODUCTION

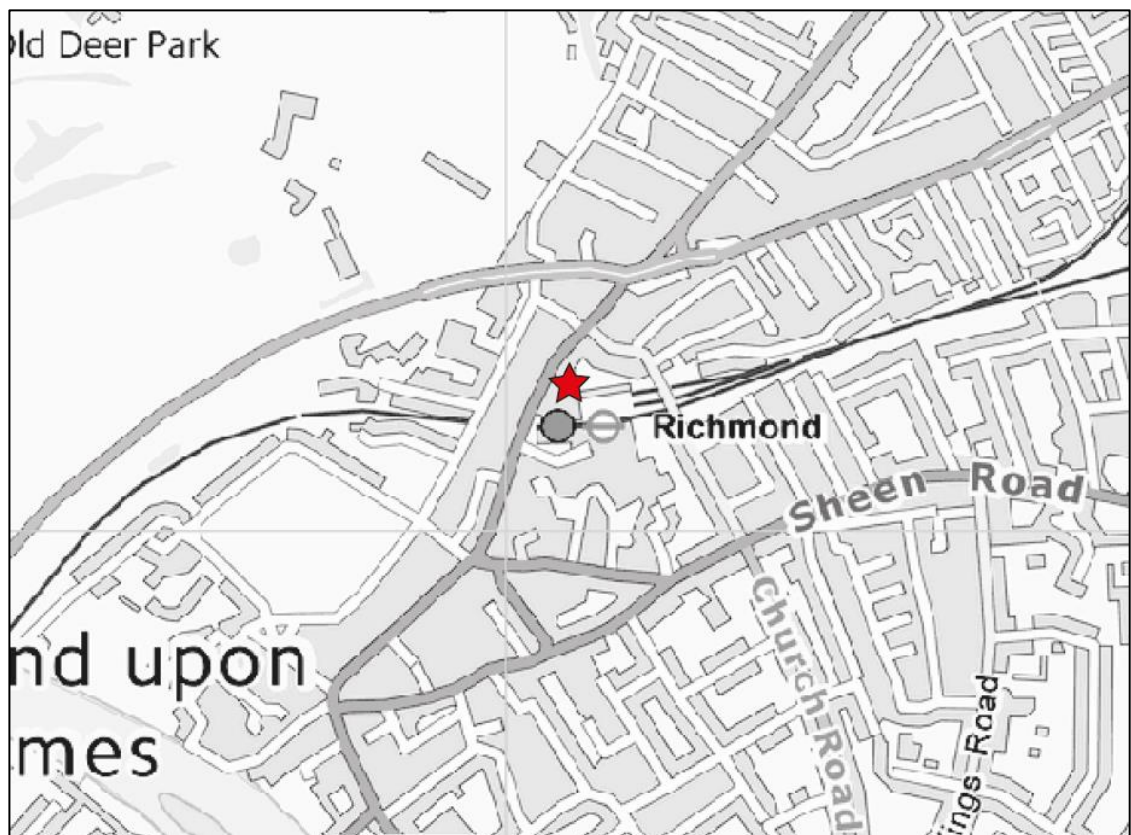
1.1 Overview

1.1.1 Baden Prop Limited ('the Applicant') has appointed i-Transport LLP to produce a Transport Statement to support a planning application at Westminster House, Kew Road, Richmond, for the:

"Creation of two additional levels of Class C3 accommodation comprising 7no.units, conversion and excavation of the existing Class E basement and part conversion of existing floorspace at basement, ground, first, second, and third floor levels to provide internal access and ancillary residential floorspace with external alterations and associated development."

1.1.2 The site is located directly to the north of Richmond Station on the A307 Kew Road. The entrance to the station car park forms the northern boundary, the car park itself the eastern boundary, the pedestrianised station forecourt the southern boundary, and Kew Road the western boundary. The site location is indicated in **Image 1.1** below.

Image 1.1: Site Location



1.1.3 The local planning and highway authority is the London Borough of Richmond upon Thames (LBRuT).

1.2 Planning Background

- 1.2.1 The site benefits from planning permission for a gym (with a floor area of 288.5sqm) in the basement, granted in December 2022, which involved creating a new shopfront and access on the northern end of Westminster House (*planning app ref: 22/2962/FUL*).
- 1.2.2 The proposals for this planning application are largely the same as that for 22/2962/FUL but also include an upwards two-storey extension to Westminster House to provide seven residential apartments. Due to the cycle storage requirements of the residential element, some amendments are required to the basement gym area.
- 1.2.3 There are elements from the previous gym application that are included within this permission, such as the new pedestrian access on the northern side of the building and the pedestrian/cycle access on the eastern side.

1.3 Pre-Application Advice

- 1.3.1 A Pre-Application meeting was held with a planning officer at LBRuT on 11th August 2023, following which written advice was provided. The key transport points included:
- Accepted it is appropriate for the development to be car-free; though would require the Applicant to enter into an agreement with the council under a Section 106 to preclude occupants of the residential units from buying parking permits in any CPZ;
 - Advised all details of the cycle parking are to be submitted with any forthcoming planning application; and
 - Advised all details of the refuse collection strategy to be submitted with any forthcoming planning application.
- 1.3.2 The above points have been taken into account and the relevant information requested included within this TS.
- 1.3.3 It was also advised that a detailed Construction Management Plan would be requested by way of a pre-commencement planning condition. This has been submitted with the planning application.
- ## 1.4 Scope and Structure
- 1.4.1 This Transport Statement (TS) has been prepared to assess the potential implications of the scheme on the local transport network and explores the accessibility of the site to local facilities and opportunities for sustainable travel.

1.4.2 The remainder of this report is structured as follows:

- Section 2 summarises the relevant national and local transport planning policies the scheme will be assessed against;
- Section 3 briefly reviews the sustainable travel opportunities available in the vicinity of the site and the accessibility of it to local facilities;
- Section 4 sets out the development proposal, including the cycle parking and servicing arrangements;
- Section 5 provides the potential trip generation of the scheme using trip rates from TRICS; and
- Section 6 concludes the report.

SECTION 2 POLICY CONTEXT

2.1 National Policy

National Planning Policy Framework (NPPF) (September 2023)

2.1.1 The NPPF sets out the Government's planning policies and how these are expected to be applied. Paragraph 110 presents the primary transport and design tests for new development proposals, stating that plans and specific applications for development should ensure that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."

2.1.2 Paragraph 111 of the NPPF presents a demanding test for assessing transport impacts. Only if there would be an 'unacceptable impact on highway safety' or when residual cumulative impacts are 'severe' should proposals be refused on transport grounds. Within this context, paragraph 112 goes on to stipulate that developments should prioritise pedestrians, cyclists and people with reduced mobility to create places that are safe, secure and attractive.

National Planning Practice Guidance (NPPG) (2014) (June 2021)

2.1.3 The NPPG provides guidance on when Transport Assessments and Transport Statements are required, and what they should contain, stating in paragraph 2:

"Travel Plans, Transport Assessments and Statements are all ways of assessing and mitigating the negative transport impacts of development in order to promote sustainable development. They are required for all developments which generate significant amounts of movements."

2.2 Regional Policy

The London Plan (March 2021)

2.2.1 The London Plan, adopted in March 2021, sets out an integrated economic, environmental, transport and social framework, for the development of London over the next 20-25 years.

2.2.2 Transport policies are set out within Section 9. The most relevant policies to the proposed development are:

- Policy T1 Strategic Approach to Transport – all development should facilitate the delivery of the Mayor’s strategic target of all trips in London to be made by foot, cycle or public transport by 2041. Developments should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London’s transport networks and supporting infrastructure are mitigated.
- Policy T2 Healthy Streets – development proposals are required to deliver patterns of land use that facilitate employees making trips by walking or cycling.
- Policy T3 Transport Capacity, Connectivity and Safeguarding - development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.
- Policy T4 Assessing and Mitigating Transport Impacts - transport assessments should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.
- Policy T5 Cycling - development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This is achieved through supporting the delivery of a London-wide network of cycle routes, and appropriate cycle parking, that is designed and laid out in accordance with the guidance contained in the London Cycling Design Standards (LCDS), and that meets the minimum standards set out in Table 10.2.

- Policy T7 Deliveries, Servicing and Construction - development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

2.3 Local Policy

London Borough of Richmond upon Thames - Local Plan (July 2018)

- 2.3.1 The Local Plan for the borough of Richmond was adopted in July 2018 and establishes the policies for supporting development of the Borough. Of most relevance to this site in transport and highways terms are Policy LP24 Waste, LP25 Development in Centres, LP44 Sustainable Travel Choices, and Policy LP45 Parking Standards and Servicing.
- 2.3.2 **LP24 – Waste** establishes the need for all developments, including conversions and change of use, to provide adequate refuse and recycling facilities, which allow for ease of collection and which occupiers can easily access.
- 2.3.3 **LP25 – Development in Centres** ensures that non-retail development which generates high levels of trips should be located within a main centre boundary such as Richmond town centre.
- 2.3.4 **LP44 – Sustainable Travel Choices** establishes the need for new development to encourage sustainable travel choices. Developments will be supported that provide:
- A sustainable location of development;
 - Walking and cycling provision;
 - Public transport provision; and
 - Limited impact on road network;

2.4 Parking Standards

The London Plan (March 2021)

Car Parking

- 2.4.1 The car parking standards within the London Plan for leisure uses are set out in Policy T6.4. For residential uses, the default position for sites within the Central Activities Zone (CAZ) and locations of PTAL 4-6 should be car free (with the exception of disabled parking).

- 2.4.2 It states that leisure uses should be located in accessible locations to encourage walking, cycling and public transport use, and sets the following requirement:

“In the CAZ and locations of PTAL 4-6, any on-site provision should be limited to operational needs, disabled persons parking and parking required for taxis, coaches, and deliveries or servicing.”

- 2.4.3 Policy T6.1 point G states that disabled persons parking should be provided for new residential development but the requirement only applies to proposals delivering 10 or more units and is therefore not relevant to this application.

Cycle Parking

- 2.4.4 **Table 2.1** summarises the minimum cycle parking standards for leisure and gym uses.

Table 2.1: Minimum Cycle Parking Standards

Use Class	Minimum Cycle Parking	
	Long Stay	Short Stay
Use Class C3	Studio/1-bed (1 person) – 1 space 1-bed (2 person) – 1.5 spaces 2 + beds – 2 spaces	5 to 40 dwellings – 2 spaces
Use Class D2 (now Use Class E)	1 space per 8 full time employed staff	1 space per 100 sqm (GEA)

Source: London Plan (2023)

Richmond-upon-Thames Parking Standards

- 2.4.5 Parking standards in the Local Plan are set out at **LP45 – Parking Standards and Servicing** and at Appendix 3 of the document. The policy requires new residential development to make provision for accommodation of vehicles appropriate to the development proposal, whilst minimising the impact of car-based travel. Generally, in areas with a PTAL of 4-6, the standard is as per the London Plan, noting that in some local circumstances other site characteristics may need to be considered.

- 2.4.6 For D2 gym use, the land use is not an exact match, with the closest being a “sports and leisure complex” where car parking is at 1 space per 25sqm and cycle parking is to be in accordance with the London Plan.

2.5 Summary

- 2.5.1 The NPPF identifies four key transport tests, which are summarised as follows:

- Opportunities for sustainable travel are provided and uptake is encouraged, i.e. the site is accessible by a range of modes of transport;

- Access arrangements are safe, convenient and do not interrupt local transport adversely;
- Transport elements are designed in line with national design guidance; and
- Any significant impacts from the development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree.

2.5.2 Paragraph 111 of the NPPF refers to ensuring new development is not refused or prevented on highways grounds providing it does not have a 'severe' impact on the local highway network and Paragraph 112 stresses the importance of giving priority to pedestrians, cyclists and people with reduced mobility, which is in line with the Healthy Streets guidance set out in Policy T2.

2.5.3 The criteria set out in both national and regional policy, depicted above, are reflected in local policy and the Proposed Development is assessed against these in this TS.

2.5.4 The various planning policy documents provide guidance on car and cycle parking requirements. The application of these to the site is assessed in later sections of this report.

SECTION 3 EXISTING TRANSPORT CONDITIONS

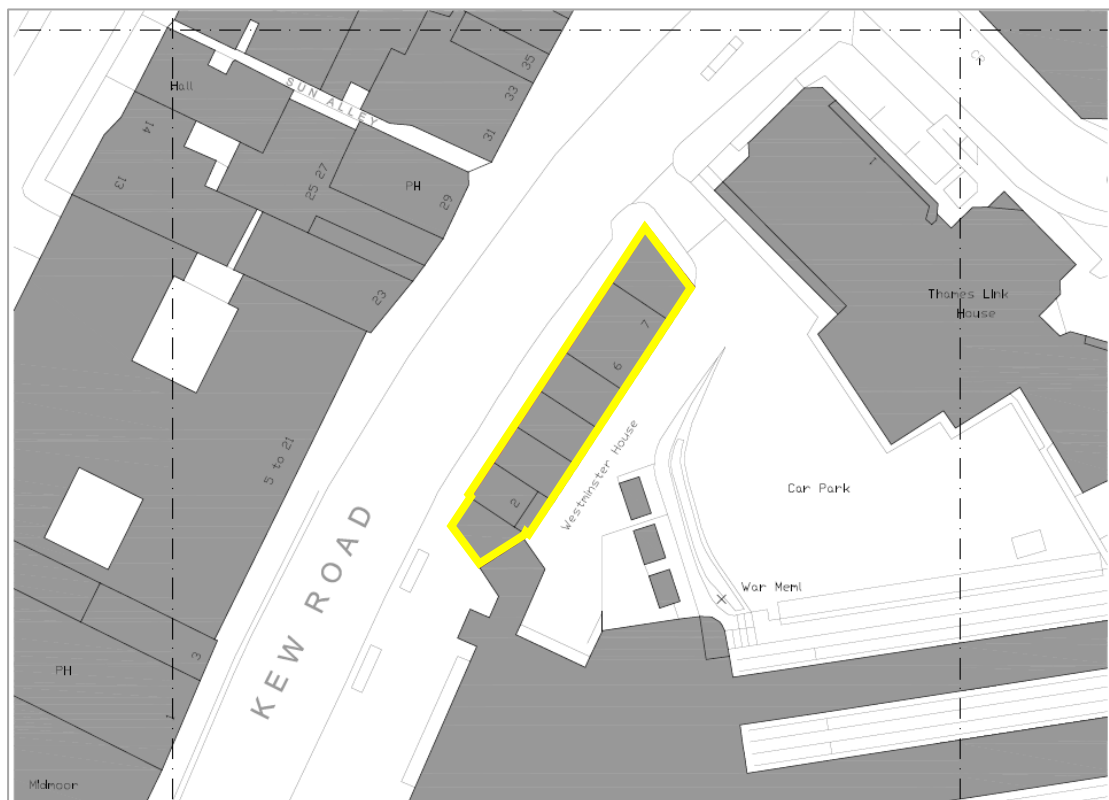
3.1 Overview

3.1.1 This section sets out the existing transport conditions in the vicinity of the site, including walking, cycling and public transport provision so that the context of the proposed development can be established.

3.2 Site Location and Existing Site

3.2.1 The site is located on the A307 Kew Road in Richmond town centre, adjacent to Richmond Station. The building is currently a four-storey mixed use building comprising retail units at ground floor and office accommodation above. Access to the retail units is from Kew Road, whilst the office access is taken from the southern end of the building fronting to the Richmond Station entrance and public realm area. Rear access to the site from the Richmond Station car park is available via an external ramp to a basement level serving a former basement car park and cycle parking area, as well as refuse store (ancillary areas to the offices). **Image 3.1** presents the site boundary.

Image 3.1: Site Boundary Plan



Source: Child Graddon Lewis Architects and Designers (Drawing number: CGL-XX-00-DR-A-PL0XX2)

3.3 Active Travel

Walking

3.3.1 The site is located in Richmond town centre and near key public transport interchanges, and furthermore provides an excellent pedestrian environment. Footways on A307 Kew Road and The Quadrant are wide, street lit, and provide pedestrian crossing facilities, with dropped kerbs and tactile paving, where appropriate.

Cycling

3.3.2 Cycle infrastructure close to the site can be considered to be of a good standard. Both signed and Quietway infrastructure is provided, facilitating safe journeys across both Richmond and Wimbledon Common and along the Thames path to Kingston. In total, over 50 miles of London Cycle Network is provided in Richmond, designed for both commuting and, increasingly, leisure use.

3.3.3 Existing cycle stands in the form of Sheffield Stands are located along the A307 within walking distance of the site.

3.4 Public Transport

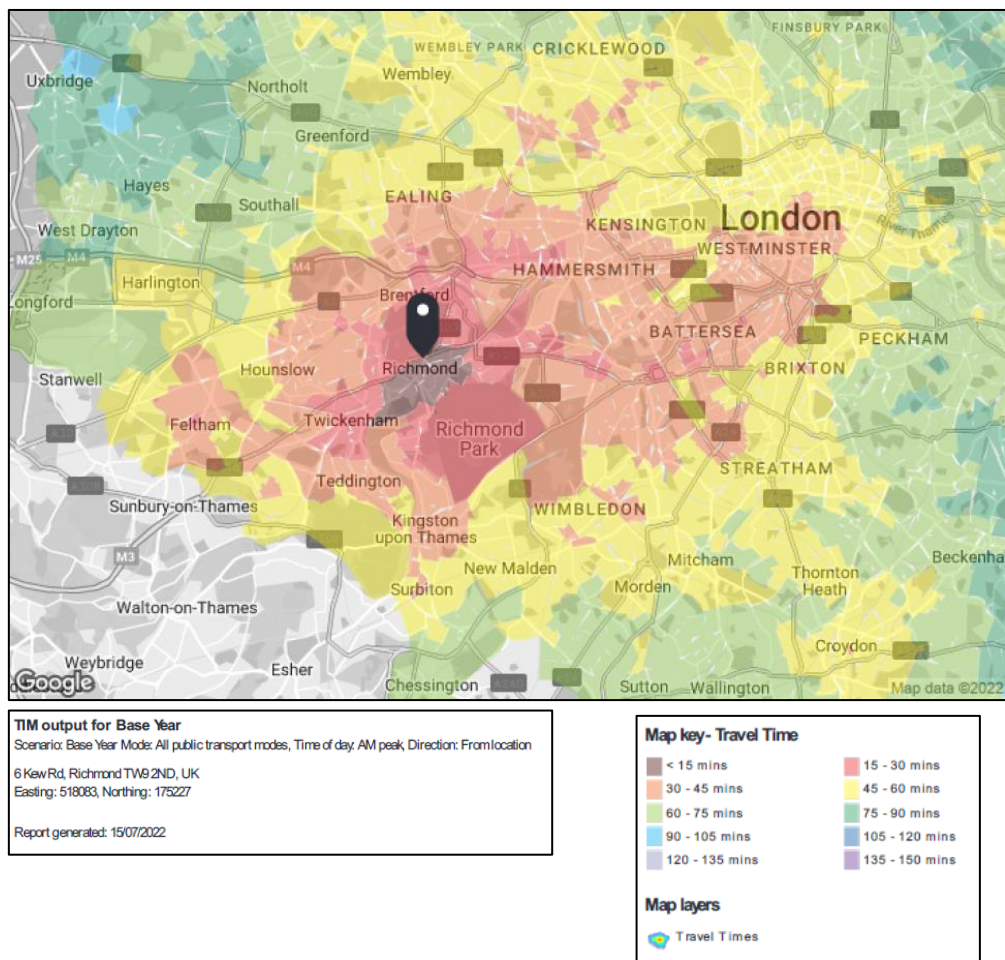
Public Transport Accessibility Level (PTAL)

3.4.1 The accessibility of the site to public transport can be measured through TfL's Public Transport Accessibility Level (PTAL) calculation tool. The assessment criteria range from 1a, indicating the lowest level of accessibility to public transport, to 6b indicating the highest level. The site has been assessed to have a PTAL of 6b, which indicates the site has an excellent accessibility to public transport. The full PTAL output is included as **Appendix A**.

Time Mapping (TIM)

3.4.2 TfL's WebCAT resource also provides travel time mapping (TIM) which reflects the travel time to the site from surrounding areas in London by public transport. Image 3.2 demonstrates that the majority of Richmond is within a 15 minutes step free public transport journey from the site, and that the site can be accessed from most of west and central London within a 30-45 minute journey on public transport.

Image 3.1: TIM Mapping



Source: TfL

Bus Services

3.4.3 A significant number of bus services operate within the vicinity of the site with three southbound stops adjacent to the building. TfL recommend a 640m maximum walking distance to a bus stop. In this case, there are three key bus stops, in each direction, within 200m that provide a significant number of services to a number of destinations, the closest of which are directly adjacent to the site. A summary of bus services from these stops is provided in **Table 3.1**.

Table 3.1: Summary of Local Bus Services

Bus Service	Origin / Destination	First Bus	Average Daytime Frequency	Last Bus	Night Service
65	Ealing Broadway Station / Kingston	05:45	Every 6 minutes	01:00	No
110	Hounslow / Hammersmith	05:34	Every 15-20 minutes	01:26	No
190	Richmond / West Brompton	05:51	Every 15-20 minutes	00:21	No
371	Kingston Hall Road / Ashburnham Road	05:43	Every 9-12 minutes	01:28	No
419	Richmond / Roehampton	05:46	Every 13-14 minutes	00:56	No
490	Heathrow Terminal 5	04:18	Every 11-13 minutes	03:48	No
H37	Hounslow / Blenheim Centre	05:27	Every 6-8 minutes	01:17	No
R70	Nurserylands Shopping Centre	05:55	Every 9-12 minutes	01:08	No
N22	Oxford Circus	23:51	Every 30 minutes	05:51	Yes
N65	Chessington / Ealing	01:21	Every 30 minutes	05:20	Yes

Source: Transport for London (accessed October 2023)

3.4.4 **Table 3.1** shows that there are clearly excellent opportunities to access the bus services within a comfortable walking distance of the site.

London Underground/Overground Services

3.4.5 London Underground services are available on the District Line, Richmond branch. The minimum off-peak service is six trains per hour (tph) via Central London to Upminster. Additional services are accessible beyond Earls Court.

3.4.6 London Overground services are provided to Stratford, via Willesden Junction and Highbury & Islington. Four tph run consistently throughout the day. This route facilitates orbital journeys to the north, north-west and east of London, providing journey opportunities to avoid Zone 1. Five carriage trains have been introduced on these services, providing additional capacity.

National Rail Services

3.4.7 All National Rail services from Richmond are provided by South Western Railway. A typical off-peak service provides 12 tph to London Waterloo. Of these, some services are classified as fast, calling at Clapham Junction only. There are also services available county-bound, towards Reading and Windsor. The remainder serve as loop services to/from London Waterloo.

3.5 Car Clubs

The London Plan recognises and encourages the use of car clubs as a mode to facilitate sustainable travel. There are six car club sites within 500m of the site. These are detailed below:

- The Green – Zipcar – 1 car;
- Old Palace Terrace – Enterprise Car Club – 1 car;
- Church Terrace – Enterprise Car Club – 1 car;
- 33 Sheen Road – Enterprise Car Club – 1 car;
- Paradise Road – Zipcar – 1 van;
- The Vineyard – Zipcar – 1 car;
- Sheen Park – Enterprise Car Club – 1 van; and
- 2 Selwyn Avenue – Enterprise Car Club – 1 car.

3.6 Car Parking

3.6.1 There are limited legal, on-street parking facilities within walking distance of the site. In addition, it is within the A1 – Richmond Town Controlled Parking Zone (CPZ) which operates between 08:30 and 18:30, Monday to Saturday and, in some locations of the zone, between 11:00 and 1700 on Sundays and Bank Holidays. In addition, some area controls on resident permit holder spaces operate between 08:30 and midnight every day. Therefore, any nearby on-street parking bays will be subject to these restrictions.

Local Car Parks

3.6.2 There are six public (council owned) car parks in Richmond town centre:

- Friars Lane – 63 spaces – 800m from site;
- Old Deer Park – 285 spaces – 450m from site;
- Old Deer Park Extension – 98 spaces (including two disabled spaces) – 450m from site;

- Paradise Road Multi-Storey – 337 spaces (including four disabled spaces) - 500m from site;
- Pools on the Park – 150 spaces (including two disabled spaces) – 500m from site; and
- Richmond Riverside – 78 spaces – 700m from site

3.6.3 There is additionally a 426 space privately operated multi-storey car park at Richmond station some 100m from the site.

3.6.4 Therefore, the site is within a 10-minute walk from 1,500 off-street car parking spaces within the town centre.

3.7 Accessibility to Local Facilities

3.7.1 The site is located on the High Street in central Richmond, and therefore benefits from a large range of employment, retail, leisure, education and health facilities within a comfortable walking distance. Some examples of these, including the proposed basement gym, are summarised in **Table 3.2**, along with the estimated walking and cycling journey times from the site.

Table 3.2: Local Facilities and Services

Facility	Approx. Distance from Site	Approx. Walking Journey Time	Approx. Cycling Journey Time
Leisure			
<i>Proposed On-site Gym</i>	1m	-	-
The Railway Tavern Pub	170m	2 mins	-
Richmond Theatre	290m	3 mins	-
Digme Fitness	400m	5 mins	2 mins
ODEON Cinema	750m	9 mins	3 mins
Retail			
Amazon Fresh	99m	1 min	-
Lloyds Bank	180m	2 mins	-
Waitrose & Partners	400m	5 mins	2 mins
Employment			
Parkshot House Business Park	60m	<1 min	-
The Bridge (Co-working) Workspace Richmond	220m	2-3 mins	-
Education			
Radnor House Prep School	450m	5 mins	2 mins

Facility	Approx. Distance from Site	Approx. Walking Journey Time	Approx. Cycling Journey Time
Marshgate Primary School	1,000m	12 mins	4 mins
Health			
Parkshot Medical Richmond	120m	1-2 mins	-
Boots Pharmacy Richmond	450m	5 mins	2 mins

Source: Consultant's Estimates based on Google Maps, a 1.4m/s walking speed and 4.4m/s cycling speed.

3.7.2 The above table demonstrates that there are a range of local facilities within a comfortable walking and cycling distance. The majority of these are also within a 10 minute walk which is considered to be a 'walkable neighbourhood' by Manual for Streets. The proposed development will also add a gym in very close proximity to the new residents.

3.8 Summary

3.8.1 The site can be considered highly accessible by a variety of sustainable modes of transport. The site is located within a PTAL area of 6b, the highest possible rating, demonstrating the site's excellent accessibility to the London Overground and Underground rail networks, the national rail station, and a large number of high frequency bus services. For journeys that require a car, there are six car club sites providing cars and two providing vans within 500m of the site.

3.8.2 In addition, the site's town centre location provides a wide range of local facilities and services which are easily accessible on foot or by cycling. The proposed development will also add a gym, benefitting both the future and existing users of Westminster House.

SECTION 4 DEVELOPMENT PROPOSAL

4.1 Overview

4.1.1 The development proposal comprises:

“Creation of two additional levels of Class C3 accommodation comprising 7no.units, conversion and excavation of the existing Class E basement and part conversion of existing floorspace at basement, ground, first, second, and third floor levels to provide internal access and ancillary residential floorspace with external alterations and associated development.”

4.1.2 The proposals for this planning application are largely the same as that for 22/2962/FUL but due to the cycle storage requirements of the additional residential element, some amendments are required to the basement gym area.

4.1.3 The proposed accommodation schedule for the residential units is as follows:

- 1x 1-bed 1 person;
- 2x 1-bed 2 persons; and
- 4x 2-bed 4 persons.

4.1.4 The proposed site plans are included as **Appendix B**.

4.2 Access

4.2.1 No car parking, and furthermore no vehicular access, will be provided for the proposed development. This is in accordance with the London Plan car parking standards which stipulates that for areas within PTALs 4-6, i.e., town centre locations such as Richmond, developments should be car-free, with the exception of accessible parking.

4.2.2 The London Plan states at Policy T6.1 point G that blue badge car parking is required for new residential development delivering ten or more units. The proposals comprise seven residential apartments and so there is no requirement to provide blue badge car parking on site. Blue badge car parking is available in nearby off-street car parks (as set out in paragraph 3.6.2).

4.2.3 Two new pedestrian accesses are proposed on the northern elevation of Westminster House, with one providing access to the basement gym (stairs only) and the other to the residential units. A lift will be provided, as well as stairs, in the residential entrance lobby.

4.2.4 A second access to the gym, to accommodate wheelchair users and those arriving by bicycle, is to be provided on the eastern side of Westminster House on the lower ground level.

4.2.5 There would be no changes to access arrangements for any of the existing occupiers of the building.

4.3 **Cycle Parking**

4.3.1 Two cycle parking stores for the gym and residential units are to be provided on the lower ground level, accessible via the access on the eastern side of the building.

4.3.2 For the gym, cycle parking for five bicycles is to be provided in the form of two Sheffield Stands and a wall-mounted stand. The residential cycle store is to accommodate 12 bicycles with two Sheffield Stands and eight wall mounted stands.

4.3.3 Two visitor cycle parking spaces are also to be provided via a Sheffield stand outside on the kerb build out to the north of the Richmond Station bus stops on Kew Road, directly outside the new gym shopfront.

4.3.4 This provision is in accordance with the minimum cycle parking standards set out in the London Plan, which requires four long-stay spaces and one short-stay for the proposed gym and for the proposed residential units, 12 long-stay spaces and two short-stay.

4.4 **Refuse and Servicing**

4.4.1 The refuse store for the gym will be located adjacent to the lower ground access and the residential refuse store is proposed on the northern side of the building, adjacent to the residential pedestrian access.

4.4.2 The waste collection for the office space is currently collected once a week by the Council. Similar arrangements will also be used for the proposed development. Waste associated with the gym can be collected at the same time as the office bins. The residential waste will be collected separately to the commercial waste but will also be once a week on the same day as other residential properties in the area.

Delivery Vehicles

4.4.3 Whilst there is no allocated parking area for the residential units, there is space to the north and east of Westminster House to accommodate a delivery vehicle parking temporarily to deliver a parcel.

SECTION 5 TRIP GENERATION

5.1 Overview

5.1.1 This section sets out the proposed trip generation of the site and the likely impact on the local highway and public transport network.

5.1.2 The proposal makes some minor reductions to existing commercial and retail floor space to provide internal access and some enhancements to the office terrace proposed. These amendments will not have a significant impact on the operation of these uses. A robust worst-case assessment has been provided where only the proposed development has been assessed to determine the additional trips on the network. It assumes the trips to the existing uses remains unchanged.

5.2 Proposed Development Trip Rates and Trip Generation

Proposed Residential Apartments (7 units)

5.2.1 To calculate the trip generation of the proposed residential units, relevant trip rates have been obtained from the TRICS database for flats under the following criteria:

- Flats Privately Owned;
- Greater London area only;
- Town Centre and Edge of Town Centre areas; and
- For weekdays only.

5.2.2 **Table 5.1** sets out the proposed total person trip rates and trip generation based on seven apartments. The full TRICS outputs are attached at **Appendix C**.

Table 5.1: Total Person Trip Rates & Trip Generation – Residential Apartments

	Trip Rates (per 1 dwelling)			Trip Generation (7 apartments)		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Morning Peak Hour (08:00 – 09:00)	0.072	0.469	0.541	1	3	4
Evening Peak Hour (17:00 – 18:00)	0.271	0.143	0.414	2	1	3
12hr Daily (0700 – 19:00)	1.901	2.252	4.153	13	16	29

Source: TRICS and Consultants Calculations

5.2.3 The results in **Table 5.1** demonstrate that there could be some four two-way person movements in the morning peak hour, three two-way person movements in the evening peak hour and around 30 two-way person movements across a 12-hour day.

Modal Split

5.2.4 To provide an indication of the likely split of travel modes for the future residents, Method of Travel to Work Census data has been obtained for the Middle Super Output Area (MSOA) Richmond upon Thames 008, which covers Kew Road and is most likely to be representative for the site location. **Table 5.2** summarises the modal split proportions and applies them to the daily total person trip generation (**Table 5.1**). Since the site is car-free, the car driver trips have been split evenly across other travel modes that are likely to be the most popular, given the site location, including public transport, walking and cycling.

Table 5.2: Modal Split

Mode and Proportion (%)		Daily Trips (0700 – 1900)		
		Arr	Dep	Two-way
Train	37%	5	6	11
Underground	27%	4	4	8
On foot	15%	2	2	4
Bicycle	8%	1	1	2
Bus	8%	1	1	2
M/C	2%	0	0	1
Other	3%	0	0	1
TOTAL	100%	13	16	29

Source: Nomis Web - Census 2011 Method of Travel to Work (QS701EW) for MSOA E02000791 Richmond upon Thames 008. Note: Numbers may not sum due to rounding.

5.2.5 The above table demonstrates that the majority (72%) of trips to/from the residential apartments will be made using public transport, 23% via active travel modes (walking and cycling) and 5% by M/C or other modes (including taxis and car passengers).

Proposed Basement Gym (257sqm)

5.2.6 The TRICS trip generation database has also been used to calculate the trip generation of the proposed gym. Relevant total person trip rates have been obtained using the following criteria:

- Greater London area only;
- Town Centre, Edge of Town Centre and Suburban areas; and

- For weekdays only.

5.2.7 **Table 5.3** sets out the proposed total person trip rates and trip generation based on 257sqm of gym floor area. The full TRICS outputs are attached at **Appendix C**.

Table 5.3: Total Person Trip Rates & Trip Generation – Gym

	Morning Peak Hour (08:00 – 09:00)			Evening Peak Hour (17:00 – 18:00)		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Trip Rates (per 100 sqm)	2.492	3.035	5.527	7.203	3.262	10.465
Trip Generation (257 sqm)	6	8	14	19	8	27

Source: TRICS and Consultants Calculations

5.2.8 The results in **Table 5.3** demonstrate that there could be some 14 two-way person movements in the morning peak hour and some 27 two-way person movements in the evening peak hour associated with the proposed gym. This is less than the approved gym scheme which the site already benefits from, due to the slight reduction in floor area.

5.2.9 Applying the modal split proportions set out in **Table 5.2** to the gym trip generation, suggests that around 10 trips in the morning peak hour and 19 trips in the evening peak hour will be made using public transport.

Total Site Trip Generation (Total Person)

5.2.10 **Tables 5.1** and **5.3** above have been combined to provide the total person trip generation for the whole proposed development in **Table 5.4**.

Table 5.4: Total Proposed Development Trip Generation – Total Person

	Morning Peak Hour (08:00 – 09:00)			Evening Peak Hour (17:00 – 18:00)		
	Arr	Dep	Two-Way	Arr	Dep	Two-Way
Trip Generation	7	11	18	21	9	30

Source: Consultant's Calculations.

5.2.11 **Table 5.4** shows that the proposed development has the potential to generate some 18 two-way person trips in the morning peak hour and 30 two-way person trips in the evening peak hour.

5.3 Impact

The development provides no car parking, in accordance with both regional and local policy in that:

- it is located in a location with a PTAL of 6b, the highest possible, indicating excellent accessibility to public transport services within close proximity of the site;
- there are large off-street car parks available within a few hundred metres to accommodate any visitor/blue-badge parking demand;
- on-street parking in the surrounding area is controlled by a combination of yellow line restrictions and some controlled parking zones, therefore reducing the propensity for any on-street parking; and
- safe and secure cycle parking is provided in the basement in accordance with minimum standards.

5.3.2 Given the site's location, within Richmond town centre and adjacent to the town's main station (served by London Overground, London Underground, and National Rail), it is anticipated that, where destinations are further than a reasonable walking or cycling distance, the vast majority of the site's residents and visitors to the gym will travel to/from the site using public transport. This is supported by the modal split proportions set out in **Table 5.2** which suggests 72% of trips to/from the site are likely to be made via public transport, which, applied to the total site trip generation, would equate to 13 public transport trips in the morning peak hour and 22 in the evening peak hour. This number of additional trips spread across the high number of frequent train, underground and bus services available in the vicinity of the site will result in a minimal impact on the public transport network.

5.3.3 It is therefore considered the development will not have a detrimental impact on the operation of the local highway network or public transport system and it will certainly not be "severe" (in NPPF terms).

SECTION 6 SUMMARY AND CONCLUSIONS

6.1 Summary

- 6.1.1 Baden Prop Limited has appointed i-Transport LLP to provide highways and transport advice in relation to the proposed development Westminster House, Kew Road, Richmond. Whilst the site benefits from planning permission for a gym, this is proposed as part of this planning application, along with a newly proposed residential element.
- 6.1.2 The residential proposals include a two-storey extension on top of Westminster House to provide seven apartments (3 x 1-bed and 4x 2-beds) with associated cycle parking. In line with local and national policy, the proposals are car-free.
- 6.1.3 The site is located in Richmond town centre with a PTAL rating of 6b, which is the highest possible. It is, therefore, extremely well located for residential apartments, with a wide range of facilities within comfortable walking and cycling distance.
- 6.1.4 The proposed development has the potential to generate a total of around 18 two-way person trips in the morning peak hour and 30 two-way person trips in the evening peak hour.
- 6.1.5 Method of Travel to Work Census data indicates that around 72% of trips to/from the site are likely to be made via public transport, which, applied to the total site trip generation, would equate to 13 public transport trips in the morning peak hour and 22 in the evening peak hour. This number of additional trips spread across the high number of frequent train, underground and bus services available in the vicinity of the site will result in a minimal impact on the public transport network.
- 6.1.6 The development will not have a detrimental impact on the operation of the local highway network or public transport system, and it will certainly not be “severe” (in NPPF terms).

6.2 Conclusion

- 6.2.1 This Transport Statement assesses the potential implications of the scheme on the local transport network and reviews the opportunity for sustainable travel to and from the site.

6.2.2 In this respect, the Transport Statement demonstrates that:

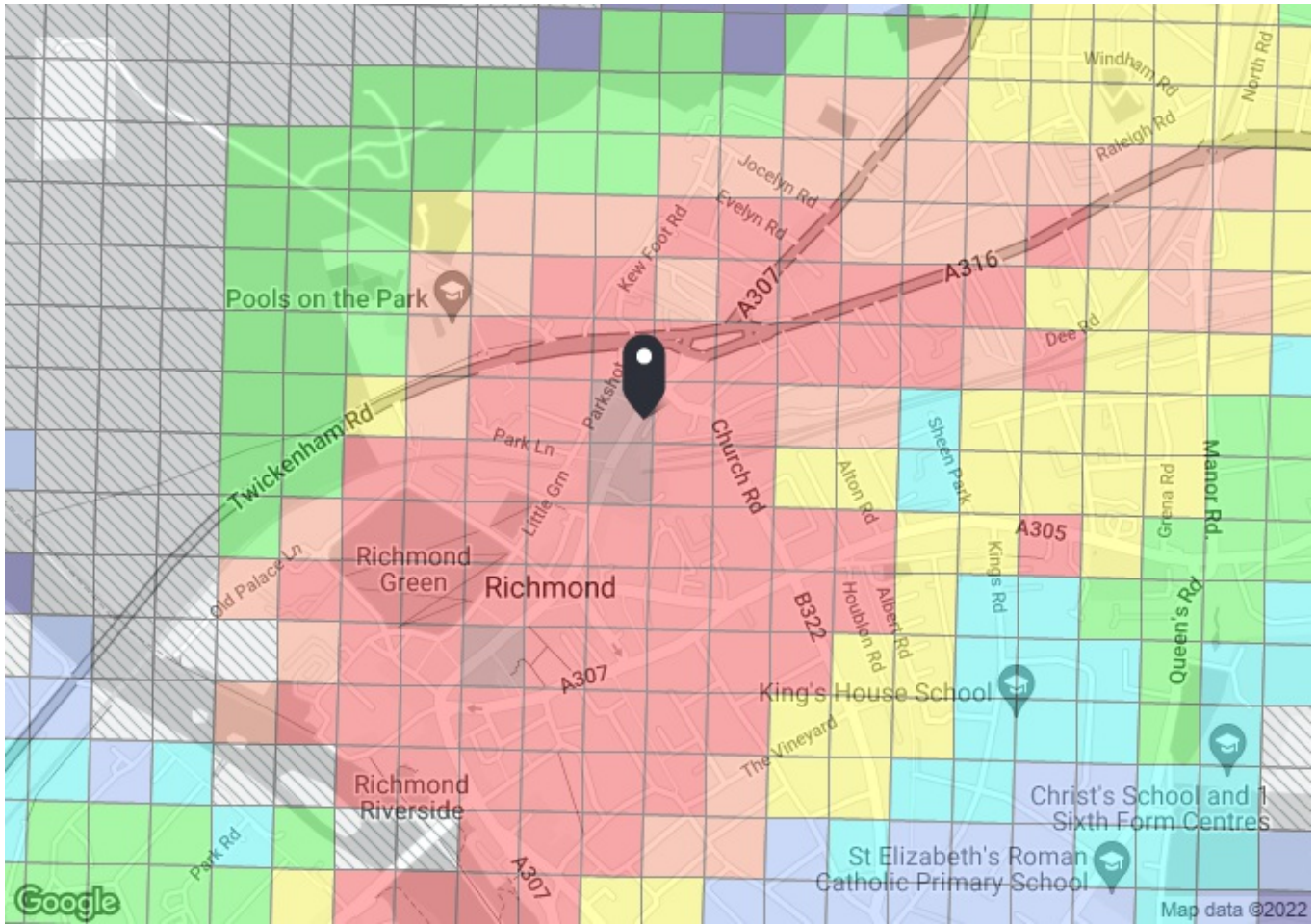
- The scheme is ideally located to encourage sustainable travel, being located within a PTAL area of 6b highlighting the significant accessibility opportunities for future employees, users, residents and visitors;
- Two solely pedestrian entrances and one pedestrian/cyclist entrance will be provided to ensure all users are able to access the gym and residential apartments;
- The level of cycle parking proposed is in accordance with the London Plan standards and the scheme is ideally located to complete a majority of local journeys to key facilities on foot or by bicycle; and
- Multi-modal trips during the peak hours are likely to be minimal, considering the range of public transport services available, and will therefore have no discernible impact on any one mode.

6.2.3 Against this background, the development is considered to fully accord with local and regional policy, and crucially the main thrust of the NPPF, in that:

- appropriate opportunities to promote sustainable transport modes have been made;
- safe and suitable access can be achieved for all users;
- there are no significant impacts on the transport network that are considered necessary to mitigate; and
- there are no unacceptable impacts on highway safety as a result of the development and the residual cumulative impact on the road network would be negligible (and therefore clearly not “severe”).

6.2.4 The proposal is therefore acceptable in highways and transport terms.

APPENDIX A. PTAL OUTPUT



PTAL output for Base Year 6b

6 Kew Rd, Richmond TW9 2ND, UK
Easting: 518083, Northing: 175227

Grid Cell: 54575

Report generated: 15/07/2022

Calculation Parameters

Day of Week	M-F
Time Period	AM Peak
Walk Speed	4.8 kph
Bus Node Max. Walk Access Time (mins)	8
Bus Reliability Factor	2.0
LU Station Max. Walk Access Time (mins)	12
LU Reliability Factor	0.75
National Rail Station Max. Walk Access Time (mins)	12
National Rail Reliability Factor	0.75

Map key - PTAL

0 (Worst)	1a
1b	2
3	4
5	6a
6b (Best)	

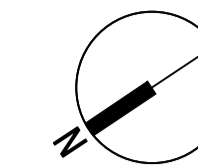
Map layers

- PTAL (cell size: 100m)

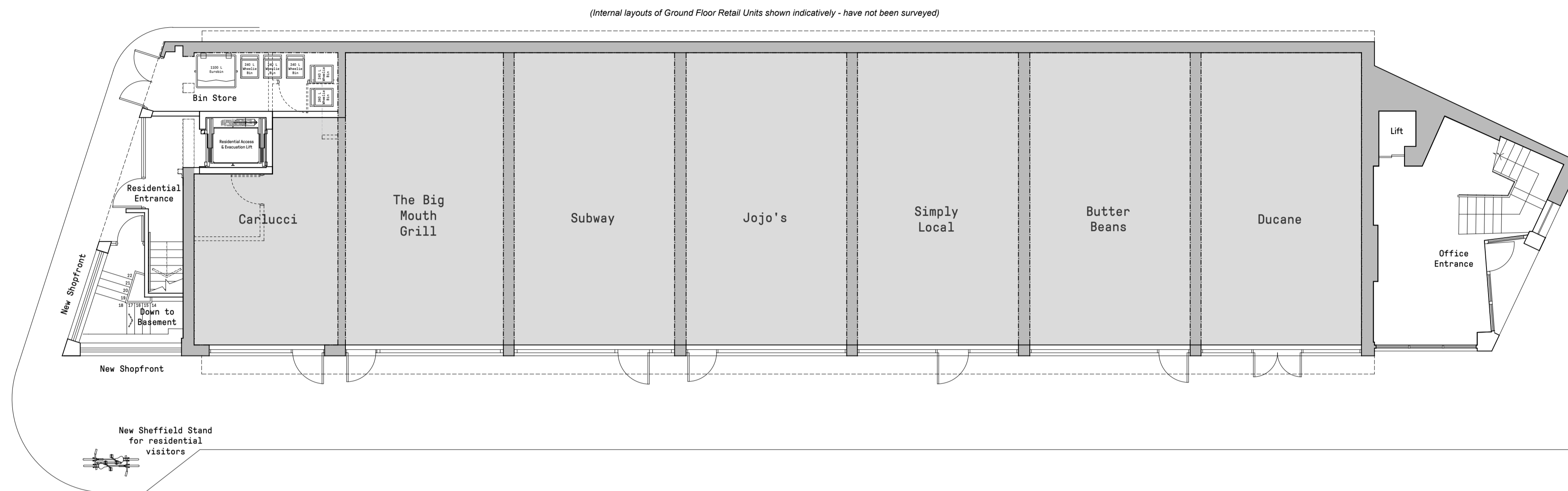
Calculation data

Mode	Stop	Route	Distance (metres)	Frequency(vph)	Walk Time (mins)	SWT (mins)	TAT (mins)	EDF	Weight	AI
Bus	RICHMOND SHEEN ROAD	33	398.58	7.5	4.98	6	10.98	2.73	0.5	1.37
Bus	RICHMOND SHEEN ROAD	337	398.58	5	4.98	8	12.98	2.31	0.5	1.16
Bus	RICHMOND STATION	493	72.45	5	0.91	8	8.91	3.37	0.5	1.68
Bus	RICHMOND STATION	65	72.45	9	0.91	5.33	6.24	4.81	0.5	2.4
Bus	RICHMOND STATION	371	28.85	7	0.36	6.29	6.65	4.51	0.5	2.26
Bus	RICHMOND STATION	190	28.85	4	0.36	9.5	9.86	3.04	0.5	1.52
Bus	RICHMOND STATION	419	28.85	4	0.36	9.5	9.86	3.04	0.5	1.52
Bus	RICHMOND STATION	490	28.85	5	0.36	8	8.36	3.59	0.5	1.79
Bus	RICHMOND STATION	H37	28.85	10	0.36	5	5.36	5.6	1	5.6
Bus	RICHMOND STATION	R68	28.85	4	0.36	9.5	9.86	3.04	0.5	1.52
Bus	RICHMOND STATION	R70	28.85	6	0.36	7	7.36	4.08	0.5	2.04
Bus	RICHMOND STATION	391	28.85	6	0.36	7	7.36	4.08	0.5	2.04
Bus	RICHMOND STATION	H22	28.85	5	0.36	8	8.36	3.59	0.5	1.79
Rail	Richmond	'RICHMND-GUILDFD 2N13'	78.33	0.33	0.98	91.66	92.64	0.32	0.5	0.16
Rail	Richmond	'ALDRSHT-WATRLMN 1N90'	78.33	1	0.98	30.75	31.73	0.95	0.5	0.47
Rail	Richmond	'RDNG4AB-WATRLMN 2C10'	78.33	0.67	0.98	45.53	46.51	0.65	0.5	0.32
Rail	Richmond	'WATRLMN-RDNG4AB 2C13'	78.33	0.67	0.98	45.53	46.51	0.65	0.5	0.32
Rail	Richmond	'RDNG4AB-WATRLMN 2C14'	78.33	0.33	0.98	91.66	92.64	0.32	0.5	0.16
Rail	Richmond	'RDNG4AB-WATRLMN 2C16'	78.33	0.33	0.98	91.66	92.64	0.32	0.5	0.16
Rail	Richmond	'WATRLMN-RDNG4AB 2C17'	78.33	1.33	0.98	23.31	24.29	1.24	0.5	0.62
Rail	Richmond	'RDNG4AB-WATRLMN 2C18'	78.33	0.67	0.98	45.53	46.51	0.65	0.5	0.32
Rail	Richmond	'WATRLMN-RDNG4AB 2C85'	78.33	0.33	0.98	91.66	92.64	0.32	0.5	0.16
Rail	Richmond	'WATRLMN-RDNG4AB 2C87'	78.33	0.33	0.98	91.66	92.64	0.32	0.5	0.16
Rail	Richmond	'RDNG4AB-WATRLMN 2C90'	78.33	0.33	0.98	91.66	92.64	0.32	0.5	0.16
Rail	Richmond	'SHEPRTN-WATRLMN 2H92'	78.33	1	0.98	30.75	31.73	0.95	0.5	0.47
Rail	Richmond	'WDON-WATRLMN 2K03'	78.33	0.33	0.98	91.66	92.64	0.32	0.5	0.16
Rail	Richmond	'WATRLMN-WATRLMN 2K09'	78.33	2	0.98	15.75	16.73	1.79	1	1.79
Rail	Richmond	'WATRLMN-WATRLMN 2O09'	78.33	2	0.98	15.75	16.73	1.79	0.5	0.9
Rail	Richmond	'WATRLMN-WATRLMN 2R09'	78.33	2	0.98	15.75	16.73	1.79	0.5	0.9
Rail	Richmond	'WSORAER-WATRLMN 2U10'	78.33	2	0.98	15.75	16.73	1.79	0.5	0.9
Rail	Richmond	'WATRLMN-WSORAER 2U13'	78.33	2	0.98	15.75	16.73	1.79	0.5	0.9
Rail	Richmond	'HOUNSLV-WATRLMN 2V05'	78.33	0.33	0.98	91.66	92.64	0.32	0.5	0.16
LUL	Richmond	'Upminster-Richmond'	78.33	6	0.98	5.75	6.73	4.46	1	4.46
LUL	Richmond	'Richmond-DagEast'	78.33	0.67	0.98	45.53	46.51	0.65	0.5	0.32
Total Grid Cell AI: 40.66										

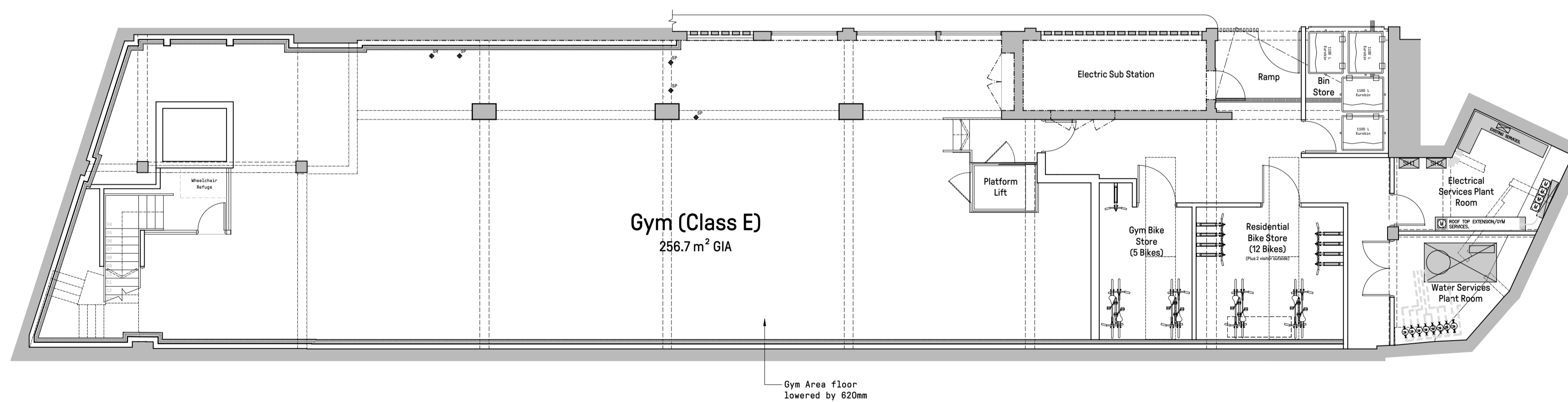
APPENDIX B. PROPOSED SITE PLANS



- Do not scale from this drawing, except for planning purposes.
- Check all dimensions on site.
- Subject to survey.
- Subject to site inspection.
- Site boundary lines are indicative only.



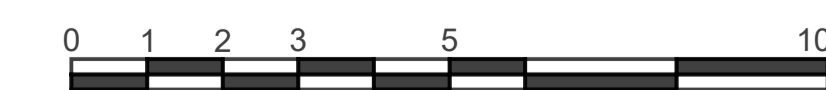
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1 PROPOSED BASEMENT PLAN
1 : 100

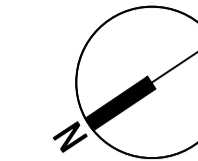
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Revision Schedule			

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sheet number		PL0001	
drawing status		PRELIMINARY	
contract no.		client ref.	
scale	1 : 100 @ A1	date	06/06/22
drawn by	JT	checked by	JK
project no.	P22-058	drawing number	CGL-Z1-00-GA-A-PL0001I
originator		level - type - rule - sheet number	

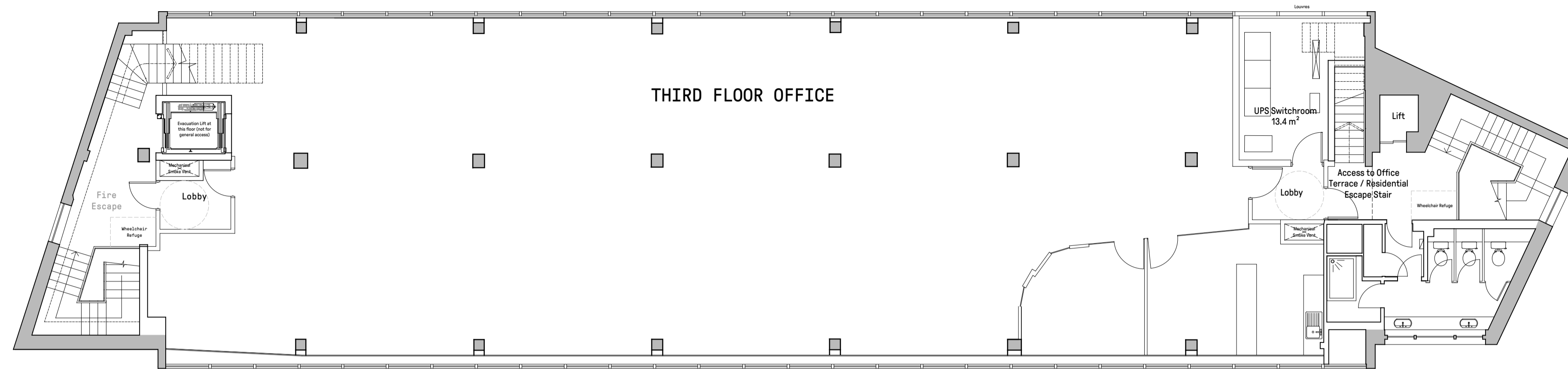


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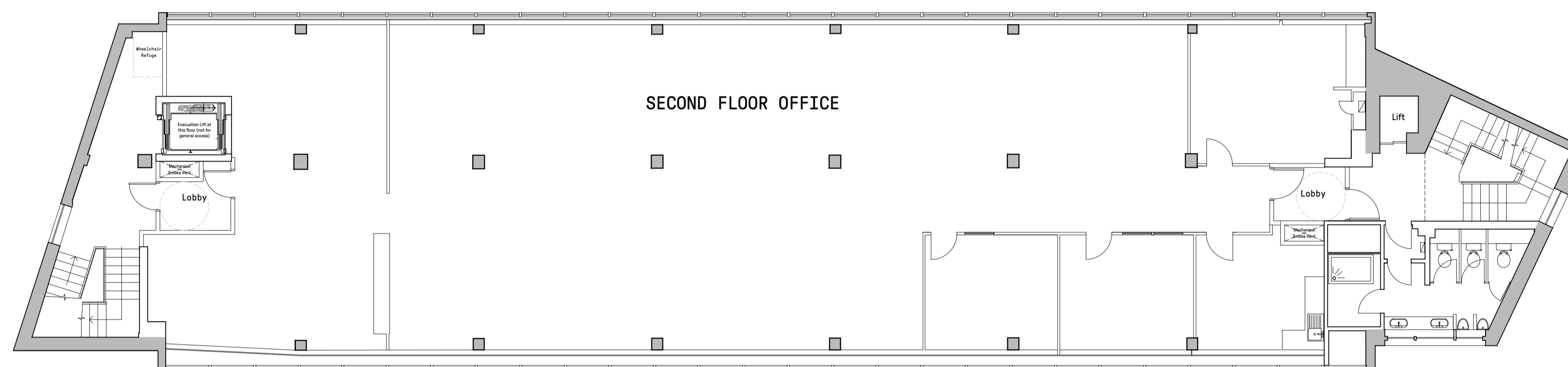
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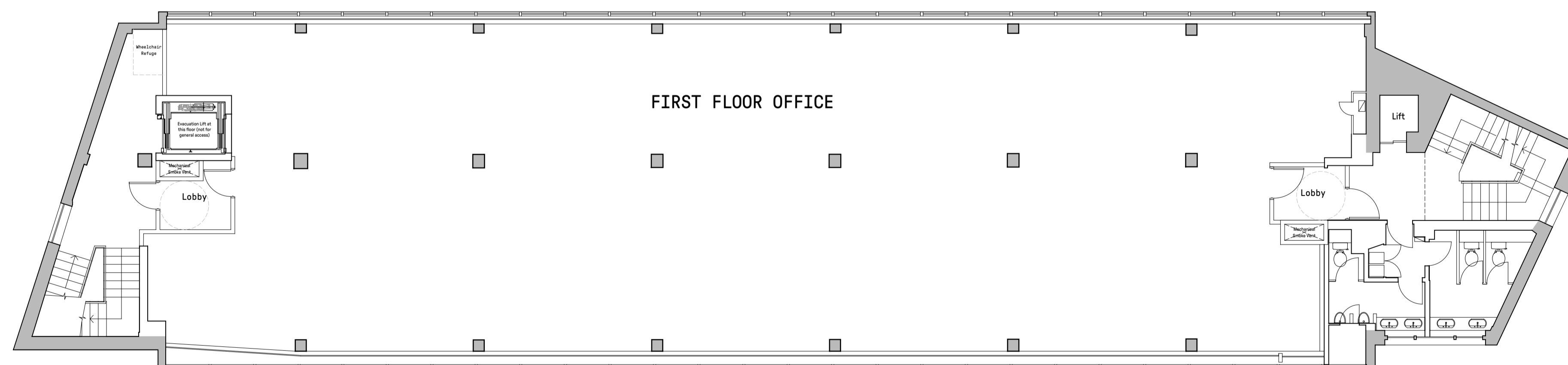
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3 PROPOSED THIRD FLOOR PLAN
1 : 100



2 PROPOSED SECOND FLOOR PLAN
1 : 100



1 PROPOSED FIRST FLOOR PLAN
1 : 100

Rev	Date	By	Description
Revision Schedule			

project
WESTMINSTER HOUSE
RICHMOND

title
PROPOSED FIRST, SECOND
AND THIRD FLOOR PLANS

sheet number
PL0002

drawing status
PRELIMINARY

contract no. client ref.

scale	date	drawn by	checked by
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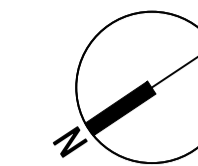


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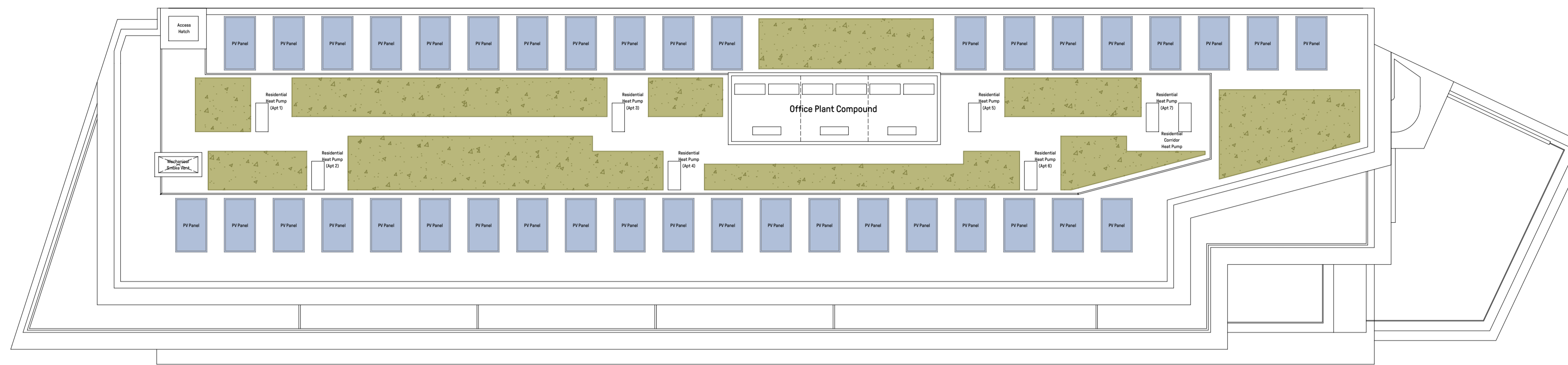
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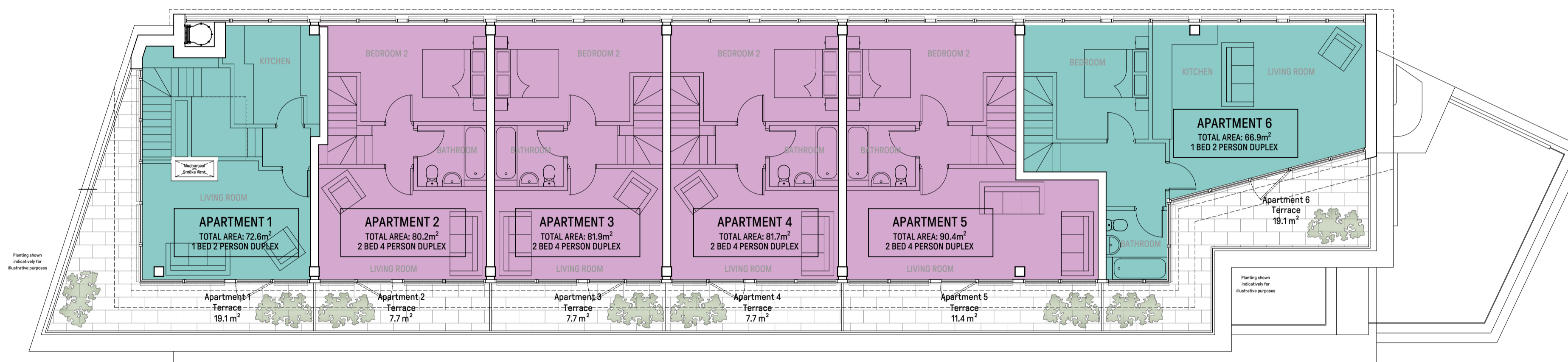
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- 1 BED 2 PERSON
- 2 BED 3 PERSON
- 2 BED 4 PERSON



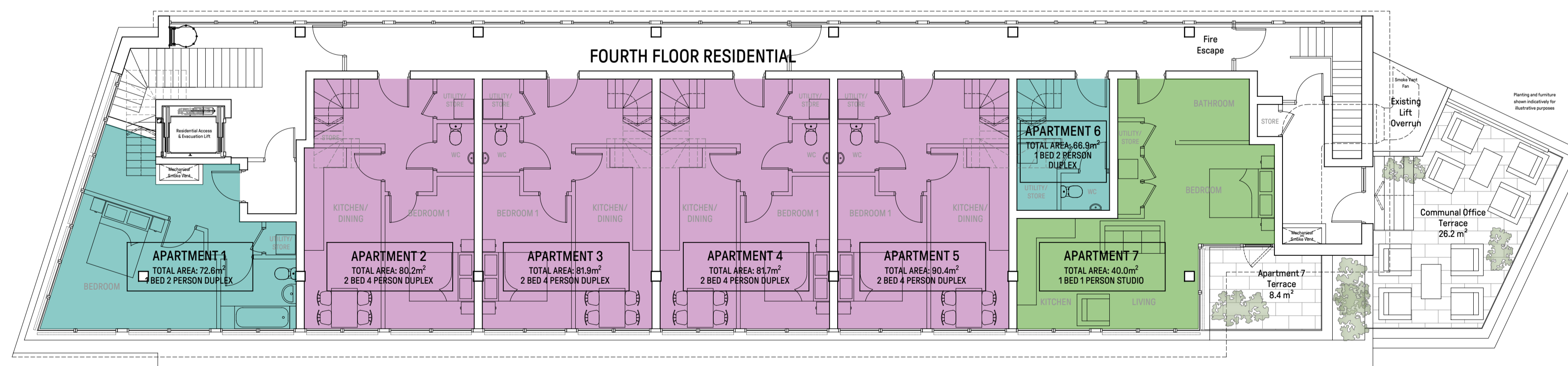
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3 PROPOSED ROOF PLAN
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2 PROPOSED FIFTH FLOOR PLAN
1 : 100



1 PROPOSED FOURTH FLOOR PLAN
1 : 100

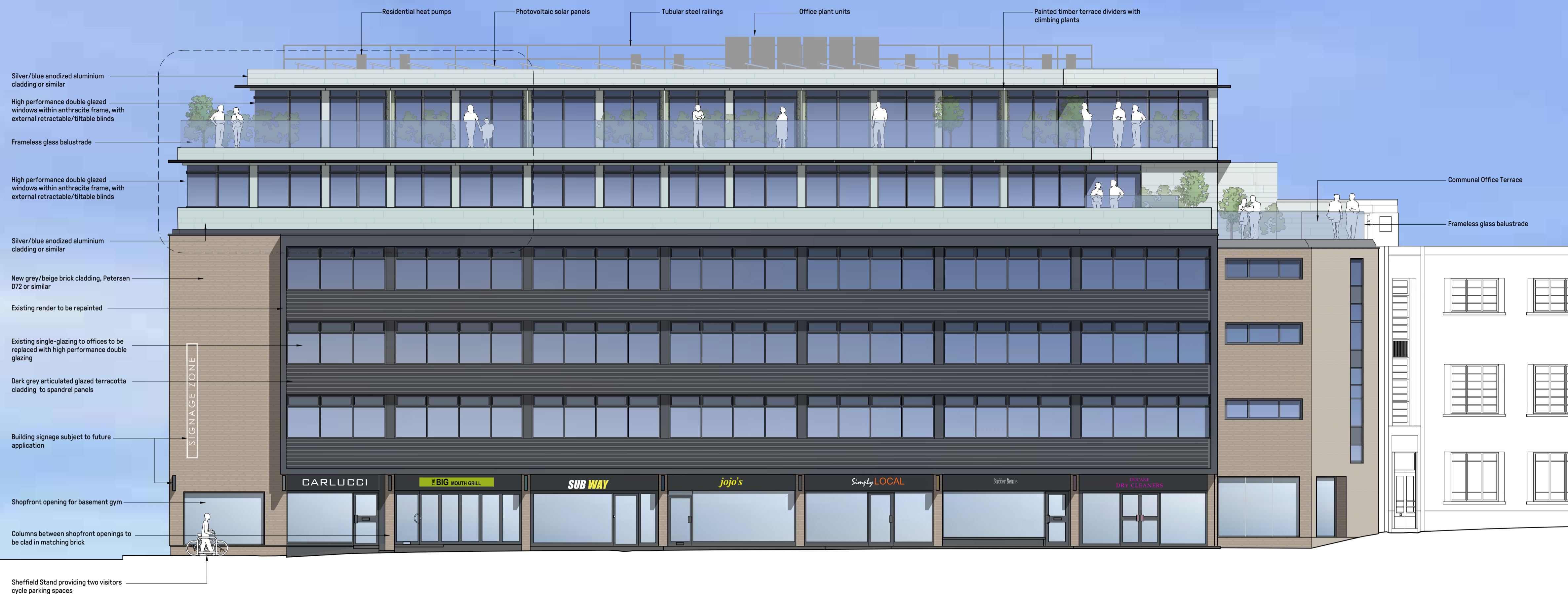
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Revision Schedule			

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contract no.		client ref.	
scale	1 : 100 @ A1	date	06/06/22
drawn by	JT	checked by	JK
project no.	P22-058	drawing number	CGL-Z1-00-GA-A-PL0003K
originator		level	type
revision		rule	sheet number



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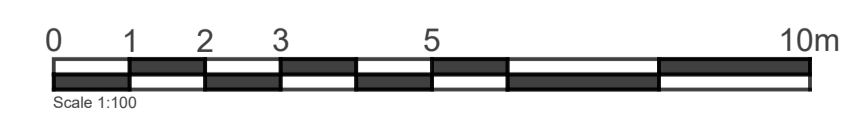
Note:
Planting shown indicatively for illustrative purposes.



1 PROPOSED FRONT (WEST) ELEVATION
1 : 100



3 EXTRACT SHOWING BLINDS UP Vs DOWN
1 : 50



2 PROPOSED SIDE (SOUTH) ELEVATION
1 : 100

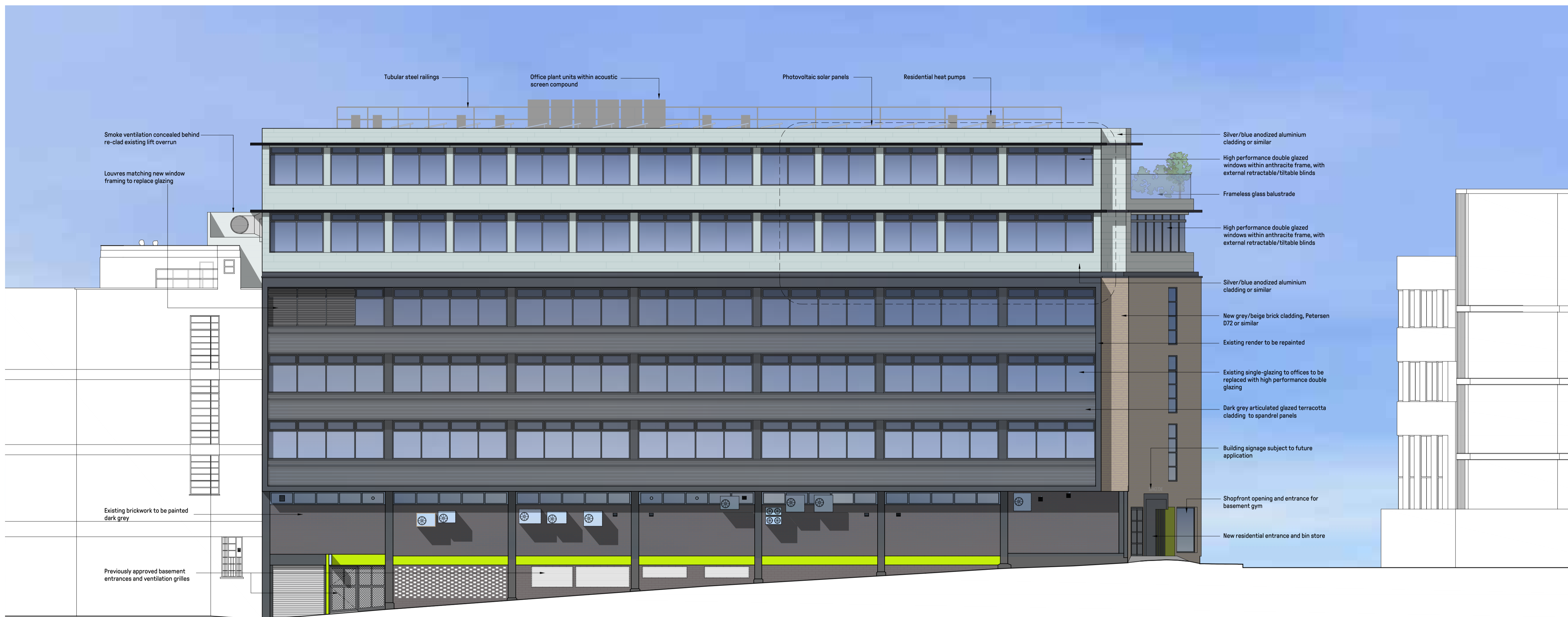
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Revision Schedule			

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drawing status		PRELIMINARY	
contract no.		client ref.	
scale	date	drawn by	checked by
1 : 100 @ A1	06/06/22	JT	JK
project no.	drawing number	revision	
P22-058	CGL-Z1-00-GA-A-PL0004G		
(originator-zone-level-type-role-sheet number)			



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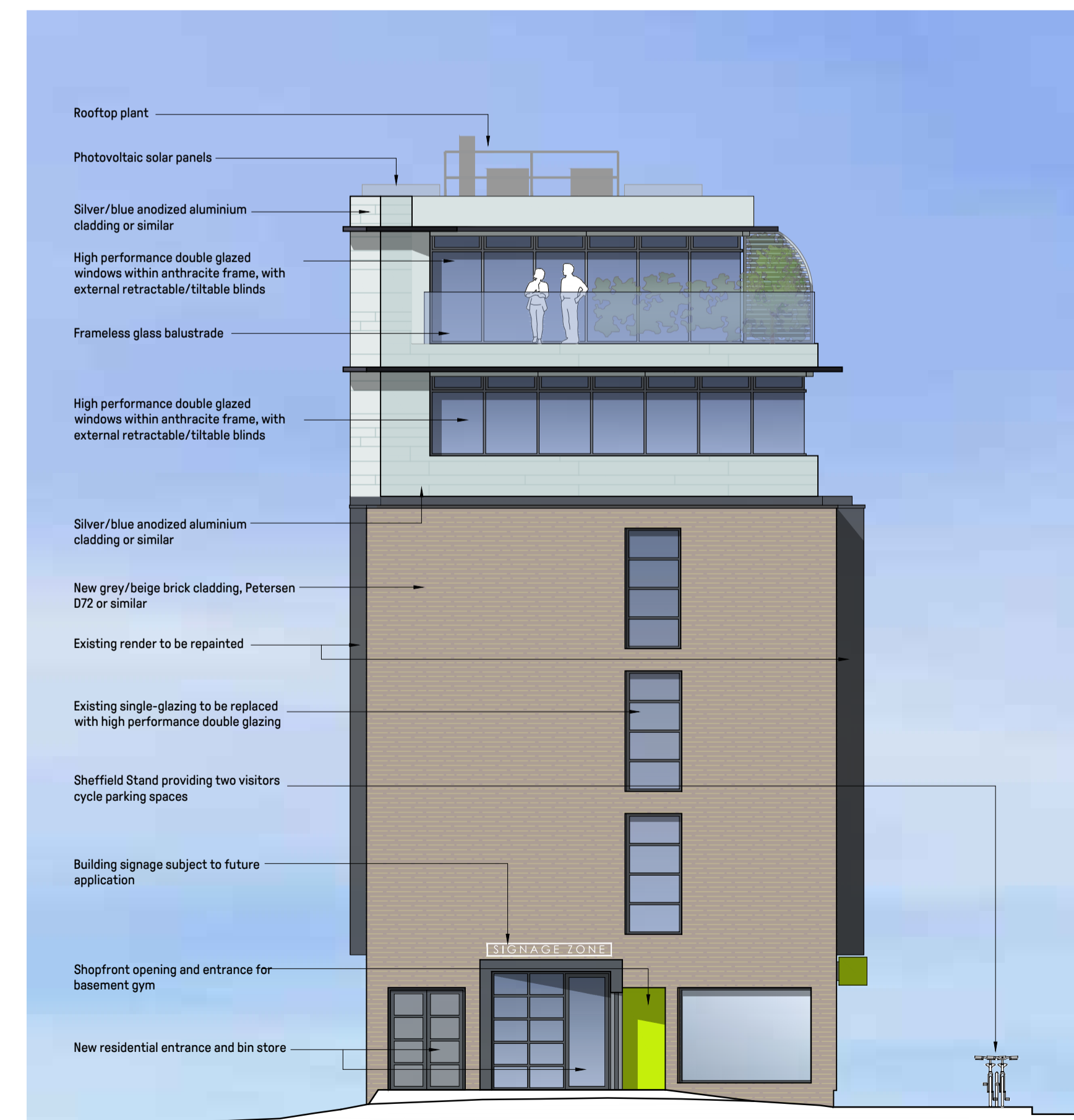
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1 PROPOSED REAR (EAST) ELEVATION
1 : 100



3 EXTRACT SHOWING BLINDS UP Vs DOWN
1 : 50



2 PROPOSED SIDE (NORTH) ELEVATION
1 : 100

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Note:
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for illustrative purposes.

Rev	Date	By	Description
Revision Schedule			

project
WESTMINSTER HOUSE
RICHMOND

title
PROPOSED
EAST & NORTH ELEVATIONS

sheet number
PL0005

drawing status
PRELIMINARY

contract no. client ref.

scale	date	drawn by	checked by
1 : 100 @ A1	06/06/22	JT	JK
project no.	drawing number	revision	
P22-058	CGL-Z1-00-GA-A-PL0005C		
(originator-zone-level-type-role-sheet number)			



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APPENDIX C. TRICS OUTPUTS

Calculation Reference: AUDIT-236603-220831-0825

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 07 - LEISURE
 Category : K - FITNESS CLUB (PRIVATE)
 MULTI-MODAL TOTAL VEHICLES

Selected regions and areas:

01	GREATER LONDON	
	BT BRENT	1 days
	HG HARINGEY	1 days
	IS ISLINGTON	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Gross floor area
 Actual Range: 1225 to 1750 (units: sqm)
 Range Selected by User: 204 to 1800 (units: sqm)

Parking Spaces Range: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/14 to 28/06/16

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Tuesday	1 days
Wednesday	1 days
Thursday	1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	3 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Edge of Town Centre	2
Suburban Area (PPS6 Out of Centre)	1

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Development Zone	1
Built-Up Zone	2

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Secondary Filtering selection:

Use Class:

E(d) 3 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order 2005 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

All Surveys Included

Population within 1 mile:

50,001 to 100,000 2 days

100,001 or More 1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

500,001 or More 3 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.5 or Less 1 days

0.6 to 1.0 2 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes 1 days

No 2 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

6a Excellent 2 days

6b (High) Excellent 1 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1	BT-07-K-01 EMPIRE WAY WEMBLEY	LIFESTYLE FITNESS		BRENT
	Suburban Area (PPS6 Out of Centre) Development Zone			
	Total Gross floor area:		1750 sqm	
	Survey date:	WEDNESDAY	03/06/15	Survey Type: MANUAL
2	HG-07-K-02 LORDSHIP LANE WOOD GREEN	THE GYM		HARINGEY
	Edge of Town Centre Built-Up Zone			
	Total Gross floor area:		1440 sqm	
	Survey date:	THURSDAY	18/09/14	Survey Type: MANUAL
3	IS-07-K-02 GOSWELL ROAD ANGEL	THE GYM		ISLINGTON
	Edge of Town Centre Built-Up Zone			
	Total Gross floor area:		1225 sqm	
	Survey date:	TUESDAY	28/06/16	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 07 - LEISURE/K - FITNESS CLUB (PRIVATE)

MULTI-MODAL TOTAL PEOPLE

Calculation factor: 100 sqm

BOLD print indicates peak (busiest) period

Total People to Total Vehicles ratio (all time periods and directions): 4.58

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00	3	1472	3.873	3	1472	1.291	3	1472	5.164
07:00 - 08:00	3	1472	2.718	3	1472	3.647	3	1472	6.365
08:00 - 09:00	3	1472	2.492	3	1472	3.035	3	1472	5.527
09:00 - 10:00	3	1472	3.465	3	1472	2.424	3	1472	5.889
10:00 - 11:00	3	1472	2.831	3	1472	2.605	3	1472	5.436
11:00 - 12:00	3	1472	3.148	3	1472	2.786	3	1472	5.934
12:00 - 13:00	3	1472	4.689	3	1472	3.511	3	1472	8.200
13:00 - 14:00	3	1472	3.851	3	1472	4.258	3	1472	8.109
14:00 - 15:00	3	1472	2.922	3	1472	3.307	3	1472	6.229
15:00 - 16:00	3	1472	2.741	3	1472	3.012	3	1472	5.753
16:00 - 17:00	3	1472	3.669	3	1472	3.352	3	1472	7.021
17:00 - 18:00	3	1472	7.203	3	1472	3.262	3	1472	10.465
18:00 - 19:00	3	1472	9.762	3	1472	6.025	3	1472	15.787
19:00 - 20:00	3	1472	7.701	3	1472	8.562	3	1472	16.263
20:00 - 21:00	3	1472	4.711	3	1472	8.267	3	1472	12.978
21:00 - 22:00	3	1472	1.948	3	1472	5.934	3	1472	7.882
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			67.724			65.278			133.002

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

