RENAISSANCE LONDON HEATHROW HOTEL

BATH ROAD HEATHROW TW6 2AQ

LONDON BOROUGH OF HILLINGDON

TRANSPORT ASSESSMENT

November 2018

The Cunningham Consultancy Limited
147 Billy Lows Lane
Potters Bar
Hertfordshire EN6 1UY
billylow@ntlworld.com

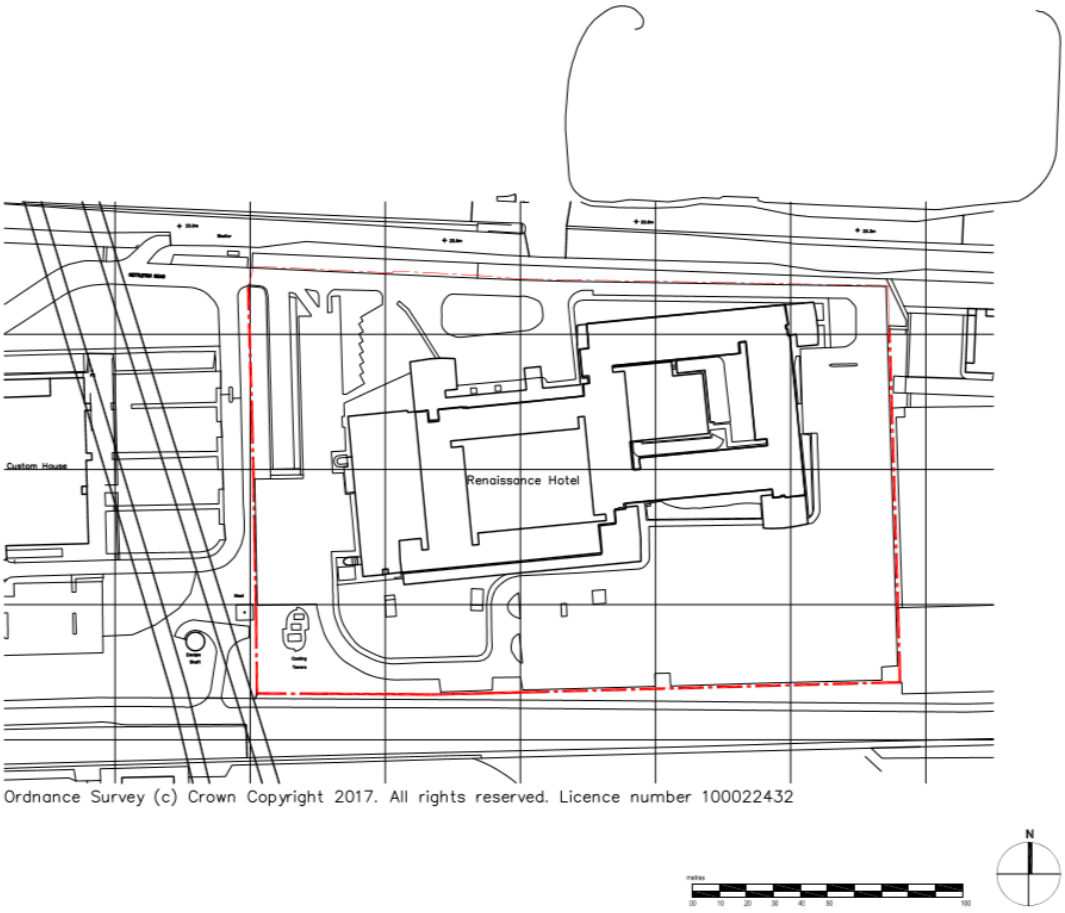
RENAISSANCE LONDON HEATHROW HOTEL, BATH ROAD, TW6 2AQ

TRANSPORT ASSESSMENT

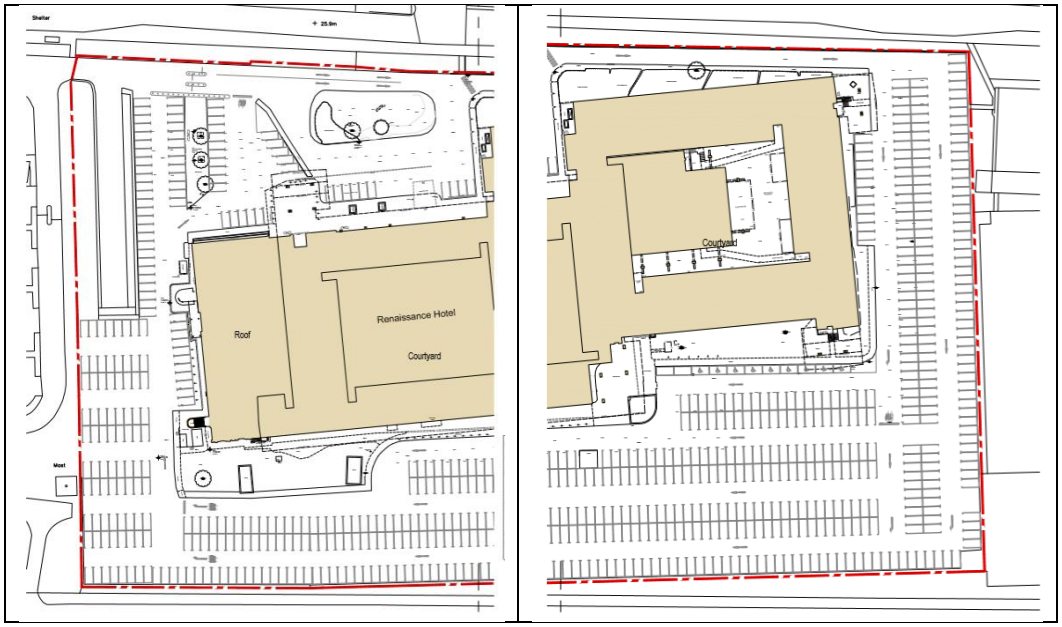
CONTENTS **PAGE**

1.0 INTRODUCTION AND BACKGROUND

1.1 The 710 bedroom Renaissance Hotel is located along the northern boundary of Heathrow Airport with a frontage towards the A4 Bath Road. The adjacent roads (with the exception of the Bath Road) are not adopted but are privately owned and controlled by the airport operator - Heathrow Airport Limited (HAL). A vehicle ramp provides access to the basement which provides a servicing bay, theatre, fitness centre, meeting rooms and back of house facilities. All vehicular access and egress to and from the hotel is via Nettleton Road which runs parallel to the A4 Bath Road and leads to the Nene Road airport roundabout. The plan of the existing hotel is shown below.



1.2 Surface level parking for 672 cars is provided on the east, south and west sides of the building with a large drop-off area at the front entrance fronting the A4 Bath Road. There are 9 current disabled spaces and no current cycle parking spaces. The plan below shows the current car parking layout.



1.3 A Planning Application (12004/APP/2018/2720) has been submitted for:

Extension to provide an additional floor (5th floor level) comprising hotel facilities, guest bedrooms and new and extended lift shafts together with amendments to car park

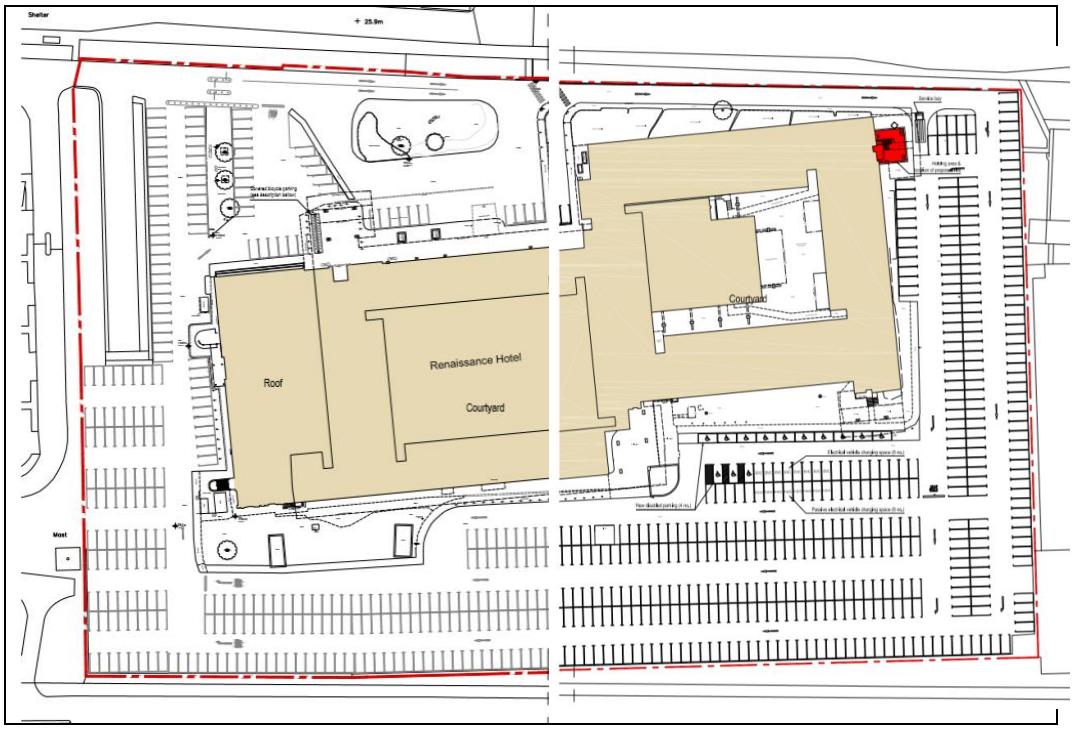
1.4 Overall, the application seeks to upgrade the existing facilities for guests at the hotel. The requirement for these additional facilities stems from the commercial need of the hotel to raise its standard of guest facilities, particularly the need to provide an improved and varied dining and meeting rooms offer. As part of the development 28 additional bedrooms are to be provided. The application proposes an additional floor (5th level) to the hotel comprising:

- 150+ cover bar with full dining menu, theatre bar for approximately 100 with a 79-seat luxury cinema style seating - all providing panoramic views southwards across the runway
- Additional meeting rooms comprising 8 small rooms and 2 no. with capacities of up to 155, break out space and support accommodation
- Executive lounge
- Executive gym and changing rooms
- Small airline crew lounge
- 1 and 2-bedroom suites (24 x 1 bed, 4 x 2 bed)
- Back of house servicing and support accommodation
- Other alterations and provision of new vertical circulation and servicing as required

1.5 The proposals include a small vehicle delivery / service area at the north-east corner of the hotel where a new servicing lobby and lift shaft would extend from ground level to the 3rd floor underneath the existing 3rd and 4th floor overhang. This extension is needed to service the main kitchen proposed which is too far from the

existing service core lifts. Also proposed is an external lift shaft that would be located within the western courtyard.

1.6 There are 667 proposed car parking spaces, a reduction of 5 car parking spaces (due to the slight re-arrangement of the on-site parking for the provision of additional disabled spaces and the proposed lift etc).



1.7 Twelve Sheffield cycle stands are proposed in front of the hotel near the main entrance, sheltered beneath projecting upper floors. Four additional disability standard parking spaces and 8 electric and 8 passive electric parking bays are proposed all in close proximity to the rear entrance to the hotel (car park entrance). These are to cater for the additional 28 bedrooms. These bays represent 38% of the number of additional bedrooms proposed (19% electric and 19% passive bays)

1.8 No changes to vehicle access or egress are proposed and there are not considered to be any adverse implications for the existing highway network. Access is via airport roads and on-street parking is prohibited on airport roads and via controlled parking on adopted public highway in the vicinity of the airport.

1.9 This report provides the necessary information to demonstrate that the proposed development is an appropriate development from a highway, traffic and transportation perspective. The Transport Assessment also seeks to take on board comments by Transport for London and the London Borough of Hillingdon in respect to previously approved planning applications for hotels in and around Heathrow.

2.0 POLICY CONSIDERATIONS

2.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the relevant provisions of the development plan, unless material considerations indicate otherwise. The development plan includes:

- The London Plan (November 2017)
- Hillingdon Local Plan: Part 1 – Strategic Policies (November 2012)
- Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012)

2.2 Hillingdon's Local Plan: Part 2 - Site Allocations and Designations; Development Management Policies; and Proposals Map was submitted for examination on 18th May 2018.

2.3 The Planning Statement covers planning issues in detail. However, in considering this planning application and the associated transport issues, it is useful to consider some of the key planning issues.

National Planning Policy Framework (NPPF) July 2018

2.4 At paragraph 11 of the NPPF the Framework states:

Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

For decision-taking this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

2.5 In terms of parking standards, paragraph 106 states:

Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.

2.6 In terms of highways and traffic, paragraph 108 states:

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured 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; and

c) 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.

2.7 Paragraph 109 of the NPPF states:

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

2.8 Paragraph 110 of the NPPF states:

Within this context, applications for development should:

a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

2.9 Paragraph 111 of the NPPF states:

All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

L B Hillingdon Policies

2.10 The key Hillingdon Local Plan transport related policies are:

AM13 Increasing the ease of movement for frail and elderly people and people with disabilities in development schemes through (where appropriate):
(i) Dial-a-ride and mobility bus services
(ii) Shopmobility schemes
(iii) Convenient parking spaces
(iv) Design of road, footway, parking and pedestrian and street furniture schemes

AM14 New development and car parking standards.

AM15 Provision of reserved parking spaces for disabled persons

AM2 Development proposals - assessment of traffic generation, impact on congestion and public transport availability and capacity

AM7 Consideration of traffic generated by proposed developments.

2.11 Part 2 of the draft Local Plan was submitted to the Secretary of State for examination on 18 May 2018. The weight that can be given to the draft plan is accordingly limited.

2.12 The policy for Heathrow airport is as follows:

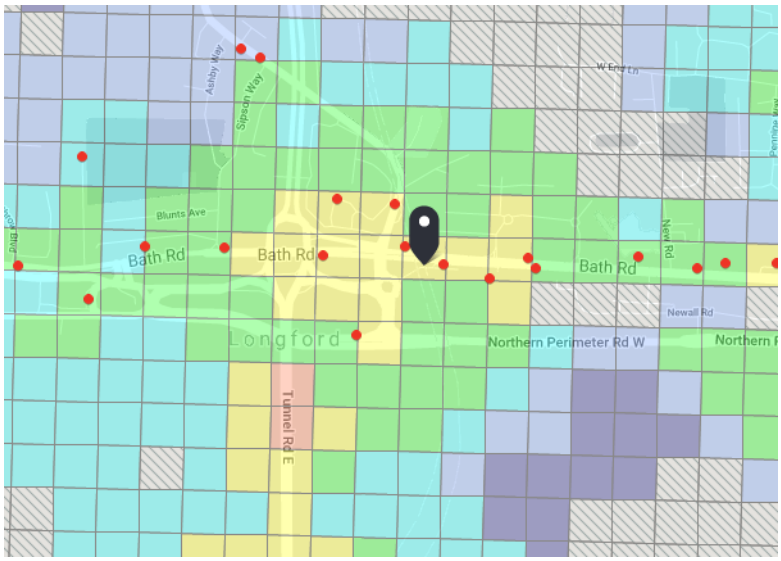
Policy T4: Heathrow Airport
Recognising the economic importance of the airport to the borough this Hillingdon Local Plan: Part 1 - Strategic Policies will support the sustainable operation of Heathrow within its present boundaries and growth in the Heathrow Opportunity

Area by facilitating improvements to public transport and cycle links, enhancing the public transport interchange to provide the opportunity for a modal shift from the use of private cars and from short haul air to sustainable transport modes and providing transport infrastructure to accommodate economic and housing growth whilst improving environmental conditions, for example noise and local air quality for local communities.

3.0 BASELINE CONDITIONS

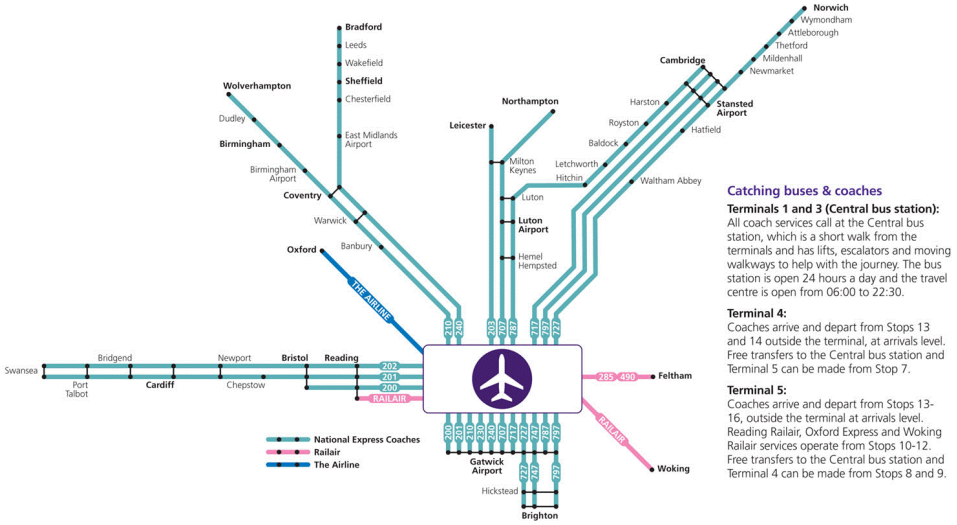
3.1 As previously stated, the Renaissance Hotel is located along the northern boundary of Heathrow Airport with a frontage towards the A4 Bath Road. The adjacent roads (with the exception of the Bath Road) are not adopted but are privately owned and controlled by the airport operator - Heathrow Airport Limited (HAL). A vehicle ramp provides access to the basement which provides a servicing bay, theatre, fitness centre, meeting rooms and back of house facilities. All vehicular access and egress to and from the hotel is via Nettleton Road which runs parallel to the A4 Bath Road and leads to the Nene Road airport roundabout. The hotel is located close to Terminals 1, 2 and 3 at Heathrow. Bath Road (A4), forms part of the Primary Road Network. Easy access can also be made onto the A312, A30, A40 and A316. Access to the Motorway Network would be from the nearby M4 Heathrow Spur. In addition, the Airport's perimeter roads provide good links to Terminals 4 and 5. The Highways Agency is the Highway Authority for the Motorway and the Trunk Roads outside of London and Transport for London (TfL) is the Highway Authority for the Primary Road Network in London (including Bath Road, A4). The relevant Local Authorities are the Highway Authorities for the other roads in the area. The Airport is responsible for the Perimeter Roads. There is excellent road access to the site. The existing road network is often congested during peak periods. Parking is restricted on the airport roads and there are Red Route controls on Bath Road, A4.

3.2 The Public Transport Accessibility Level at the site is relatively high; the WebCat map below shows a PTAL of 4 at the hotel entrance (and PTAL of 3 around the site).



3.3 Numerous bus services pass directly in front of the site: 81, 105, 111, 140, 285, U2, 222, 423 and the N9 with the bus stops being located on Bath Road close to the site entrance. Numerous bus, coach and rail services also serve the nearby Terminals 1, 2 and 3 and other airport terminals. The provision for passengers in terms of shelters, seating, street lighting and provision of bus information/timetables is good. The bus services in the area provide good connections to local residential and business areas, other bus routes and nearby rail/underground stations. An extract from the TfL spider bus map which is reproduced below shows the extensive network of bus routes in the area.

3.4 All coach services call at the central bus station. The bus station is open 24 hours a day and the travel centre is open from 06.00 to 22.30 hours. Coaches and buses connect Heathrow with the national rail network at Feltham, Reading, Woking and Watford Junction. The Heathrow Airport plan of the coach services is reproduced below in order to show the range of destinations covered by coach services.



3.5 The hotel is served by the Heathrow Hoppa bus service which provides excellent links to and from the Airport terminals.

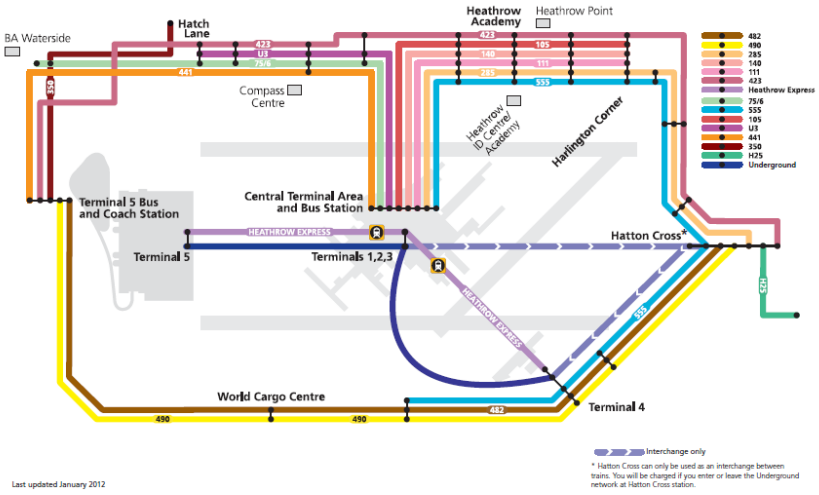
3.6 Free travel has been introduced for Oyster card holders between the Heathrow stations on the Piccadilly line. London Underground's Piccadilly Line provides the most cost-effective rail route between Heathrow and the capital. Journey time by Tube is under an hour with less than 10 minute headways, even off-peak. Trains offer the quickest link between Heathrow and central London. There are two services to choose from:

i) the Heathrow Express with a journey time of 15 minutes between the airport and London Paddington, and departures every 15 minutes. The Heathrow Express offers the fastest journey time.

ii) the Heathrow Connect stopping between London Paddington and Heathrow Airport departs every 30 minutes and calls at local stations in west London. The journey time varies between 31 and 49 minutes. The Heathrow Airport plan below shows the rail/underground services from the Airport.

3.7 There is free public transport around Heathrow (including free buses along the A4 Bath Road with nearby bus stops for the hotel) which will be extremely beneficial for staff (and guests) commuting into the CTA on tube or HEX or in the future by Crossrail. The HAL map of the Heathrow Free Travel Zone network is reproduced below.

Heathrow Free Travel Zone network



3.8 There is clearly spare capacity on the local bus services. There is also spare capacity on the Underground, train and coach services; these would need to be served by taxi or bus services.

3.9 The pedestrian facilities in the vicinity of the hotel are good with a comprehensive network of footways and footpaths. Pedestrians are able to cross the roads with formal and informal pedestrian crossings, including the signalled controlled crossing of Bath Road/Nene Road, Bath Road/Bolton's Lane and Bath Road close to Mondial Way. A pedestrian review has been undertaken during the Transport Assessment and no major issues were raised. The review showed that there are

already good quality pedestrian routes to the two nearby bus stops on both sides of the Bath Road. It is also noted that it is expected that the number of pedestrians walking to/from Terminals 1, 2 and 3 (currently prohibited) will be very low due to the existing hoppa bus service. In light of the above it is not felt that any improvements or mitigation is required.

3.10 There are a number of local cycle routes around the proposed hotel, including the existing cycle route along the A4. Information is shown on the BAA plan and London Borough of Hillingdon map. Further information on the cycle routes in the area can be obtained from the Transport for London Local Cycling Guides No. 9 and 6. It can be seen that the proposed hotel can be reached by bike via the network of cycle paths and routes including facilities on Bath Road. Generally the provision and environment for cyclists in the area is good. The Heathrow Cycle Hub is based at the Academy on Newall Road (adjacent to Bath Road).

3.11 A survey of pedestrian and cycle movements along the A4 (both for westbound and eastbound travel) was carried out for a one hour period in the morning peak period. The surveys showed extremely low levels of pedestrian movement. There were a total of 18 pedestrian movements on the shared use path during the morning peak hour (less than one every 3 minutes) and only 4 cycle movements (one every 15 minutes).

3.12 An analysis of the personal reported injury accidents in the area has not been carried out, as the development will not have a significant impact on accidents.

3.13 It is noted that all servicing and refuse collection to the hotel is via the underground ramp as shown in the photograph below. This currently works well with no significant issues.

3.14 The access to the hotel parking and drop-off is controlled by an entry barrier and two exit barriers as shown in the photograph below.

4.0 TRIP GENERATIONS AND ASSIGNMENT

4.1 As previously mentioned, there will be a reduction in the car parking provision from 672 to 667 car parking spaces, a reduction of 5 car parking spaces. This reduction will introduce further trip end restraint and therefore it is anticipated that the proposals will have no significant impact on traffic generation. In fact it could reasonably be argued that, notwithstanding the additional 28 bedrooms, the additional trip end restraint will result in a small reduction in trips.

4.2 However, an assessment of trip generations has been made using TRICS. Due to the restricted car parking provision at the proposed hotel, it is felt that this assessment will provide very much a worst case traffic generation scenario. The Cunningham Consultancy Limited have prepared a significant number of Transport Assessments for hotels in and around Heathrow Airport. These Transport Assessments have been rigorously assessed by both L B Hillingdon and Transport for London. Where required additional information has been provided and the feedback from both authorities has been included in subsequent Transport Assessments. As such for consistency and robustness the same approach has been taken for this development as is set out below.

4.3 In order to get the best fit assessment for vehicle trips to the hotel for the additional 28 bedrooms, a review of all the hotels in the TRICS database was carried out including hotels around airports. The most appropriate data was felt to be from the 289 bedroom Travelodge Hotel in West Drayton. The TRICS output has been

summarised in the table below (the highest hourly trip generations have been shown in bold).

Renaissance Hotel 28 additional Bedrooms					
Time	Trip Rates		Trips		
	IN	Out	IN	OUT	TOTAL
0700-0800	**0.06**	**0.13**	2	4	5
0800-0900	0.05	0.07	1	2	4
0900-1000	0.04	0.11	1	3	4
1000-1100	0.04	0.02	1	1	2
1100-1200	0.03	0.02	1	1	1
1200-1300	0.05	0.04	1	1	2
1300-1400	0.05	0.03	1	1	2
1400-1500	0.05	0.04	1	1	2
1500-1600	0.07	0.05	2	1	3
1600-1700	0.07	0.04	2	1	3
1700-1800	**0.12**	**0.07**	3	2	5
1800-1900	**0.14**	**0.05**	4	1	5
					40

4.4 The assessment indicates that the 28 bedrooms could have a total of 40 one-way vehicle trips between 0700 and 1900 hours (equivalent of 20 vehicles arriving and departing). The peak hourly flows occur between 0700-0800, 1700-1800 and 1800-1900 hours when there are 5 arrivals or departures. These flows would be small compared to the number of trips, and even daily fluctuation in trips, in the surrounding area. It is emphasised that these flows are upper bound figures and that the actual traffic generation is likely to be insignificant due to the reduction in parking provision.

4.5 Some concerns were raised by Transport for London in light of the use of this single site from the TRICS data base. In response, it was emphasised that while the TRICS data is only based on one site, this site was the one that was most applicable due to its proximity to Heathrow Airport. It was also noted that a full interrogation of TRICS was carried out before this decision was taken, as has been done for this Transport Assessment. It was noted that other more recent TRICS data for hotels was examined in more detail and showed similar traffic generation. For example a more comprehensive assessment of hotels was carried out for a proposed hotel at the Brit Oval and the Transport Assessment for this development was accepted by TfL. This comprised of surveys of several hotels in London. The trip generations were very similar to that used in the Transport Assessment for the current application. For example the peak trip generations for the Brit Oval Hotel Transport Assessment was 0.23 two-vehicle trips per bedroom compared to the 0.19 two-way trips per bedroom in the current Transport Assessment. The TRICS data used is therefore felt to be robust and generally provide an over estimate of car trips.

4.6 While the single site that has been used is felt to be the most appropriate, it is acknowledge that other factors will have an effect on trip generation. The TRICS

assessment has been carried out to provide a worst case scenario sensitivity test, as actual trip generation will be constrained by the reduction in parking provision.

Multi-modal trip assessment

4.7 A multi-modal trip assessment has also been carried out in accordance with London Plan Policy 6.3 – Assessing effects of Development on Transport capacity. As stated above, the Transport Assessment was based on a single TRICS site/survey in the Heathrow area. This survey was not a multi-modal and only had trip data for vehicle trips (vehicles, OGVS, PSVS, Cyclists). To address the requirement for a multi-modal trip assessment we have carried out a further trip assessment using TRICS. For this assessment we have used all multi-modal surveys in the TRICS data base for hotels in London. This included surveys at nine different hotels (in Bexley, Camden, Merton and two in Greenwich, Hackney and Hounslow). Detailed output of this multi-modal TRICS assessment can readily be provided on request.

4.8 The Table below shows the daily trip rates per bedroom and peak hour trip rates per bedroom for both the single site in the initial Transport Assessment (0700-1900 hours) and for the multi-modal TRICS assessment using the nine sites (0600-2200 hours).

	Vehicles	OGVs	PSVs	Cyclists	Pedestrians	Public Transport
Single TRICS site (0700-1900)	1.414	0.035	0.347	0	N/A	N/A
Multi-modal Assessment (9 sites 0600-2200)	1.486	0.043	0.013	0.031	2.411	1.598
Multi-modal Assessment (9 sites AM Peak hour)	0.147	0.012	0.004	0.004	0.201	0.202
Multi-modal Assessment (PM Peak hour)	0.130	0.003	0.001	0.004	0.255	0.118

4.9 The above analysis shows a fairly close relationship between the two assessments, particularly in light of the different time periods surveyed. This again gives further confidence on the use of a single TRICS site. The multi-modal assessment provides the following modal split:

Modal Split	Percentage
Vehicle Occupants	20.1
Public Transport Users	31.6
Pedestrians	47.8
Cyclists	0.4

4.10 It is noted that the modal split for pedestrians seems high when applied to the Renaissance Hotel.

4.11 Using the trip rates from multi-modal surveys the following daily and peak hour trips for the 28 additional bedrooms can be calculated.

	Vehicles	OGVs	PSVs	Cyclists	Pedestrians	Public Transport
Multi-modal Assessment (9 sites 0600-2200)	42	1	1	1	68	45
Multi-modal Assessment (9 sites AM Peak hour)	4	1	1	1	6	6
Multi-modal Assessment (PM Peak hour)	4	1	1	1	7	3

4.12 From the table above, it can be seen that there would be 45 additional one-way public transport trips per day with a morning peak of 6 trips per hour. There is clearly spare capacity on the local bus services. There is also spare capacity on the Underground, Train and coach services to cater to the small number of additional trips likely to be generated.

4.13 It is envisaged that staff and guests at the hotel will use the existing Heathrow Hoppa bus service. This will limit the impact on any regular bus services in the area.

4.14 Servicing and deliveries levels for the development will be relatively low and would generally be accommodated by medium to small sized vans or even cars. It is likely that delivery vehicle trips will be spread throughout the day and that the peak flows are likely to take place during the off-peak day time period. The TRICS assessment suggests 1 one-way OGV trips in total. The proposed development will generate more deliveries than this but the number of trips will be very low.

5.0 PARKING STANDARDS

5.1 The Council's Car Parking Standards are contained within Annex 1 of the UDP Saved Policies September 2007. There is no car parking standard for C1 Hotel uses which is therefore reliant on the London Plan which in turn relies on a transport assessment. The London Plan provides for a benchmark of 1 space per bedroom for hotels on key arterial roads outside of central locations.

5.2 There is a desire to reduce the level of parking provision per bedroom in order to act as a parking restraint mechanism. As a starting point the parking standard of 1 space per bedroom as contained in the London Plan has been considered. This would result in a parking provision of 28 additional spaces. It is felt that this would

provide significantly too much parking and would encourage car travel. Given the relatively good PTAL in the vicinity of the site and the already high ratio of parking to bedrooms, it is felt that a small reduction in car parking is appropriate.

5.3 The proposed car parking plan is shown in Section 1 of this report. The parking is controlled principally by pricing with the following charges currently applying:

2 Hours £5.00
5 Hours £10.00
8 Hours £15.00
12 Hours £20.00
24 Hours £30.00

5.4 The existing and proposed parking spaces are set out in accordance with good practice. The car parking spaces are 2.4 x 4.8 metres and the aisle widths around 6 metres. The photographs below show the one-way route around the hotel.

5.5 There are 12 proposed cycle spaces close to the front of the hotel which will ensure formal, secure and sheltered cycle parking is available. This is in excess of the TfL requirement of 1 space per 20 bedrooms and provision of short stay cycle parking at a ratio of 1 space per 50 rooms.

5.6 Four additional disability standard parking spaces are proposed and these will be located close to the rear entrance to the hotel (car park entrance shown in the photograph below) for the convenience of these guests. There are also 8 electric and 8 passive electric parking bays proposed all in close proximity to the rear entrance to the hotel. These are to cater for the additional 28 bedrooms. These bays represent 38% of the number of additional bedrooms proposed (19% electric and 19% passive bays).

5.7 In addition to the above car parking spaces there is already space for three coaches to park and drop-off/pick up.

6.0 SUMMARY AND CONCLUSIONS

6.1 The 710 bedroom Renaissance Hotel is located along the northern boundary of Heathrow Airport with a frontage towards the A4 Bath Road. There are good connections to the Strategic Highway Network. The hotel has a fairly high PTAL with good local public transport options and good pedestrian and cycle access. All vehicular access and egress to and from the hotel is via Nettleton Road which runs parallel to the A4 Bath Road and leads to the Nene Road airport roundabout. Surface level parking for 672 cars is provided with a large drop-off area at the front entrance fronting the A4 Bath Road. There are 9 disabled spaces, coach parking and an area for the hoppa bus service. There are no electric vehicle charging points and no current cycle parking spaces. A vehicle ramp provides access to the basement which provides a servicing bay and back of house facilities.

6.2 A Planning Application (12004/APP/2018/2720) has been submitted for:

Extension to provide an additional floor (5th floor level) comprising hotel facilities, guest bedrooms and new and extended lift shafts together with amendments to car park

6.3 As part of the development 28 additional bedrooms are to be provided. The proposals include a small vehicle delivery / service area at the north-east corner of the hotel. There are 667 proposed car parking spaces, a reduction of 5 car parking spaces. Twelve Sheffield cycle stands are proposed in front of the hotel near the main entrance, sheltered beneath projecting upper floors. Four additional disability standard parking spaces and 8 electric and 8 passive electric parking bays are proposed all in close proximity to the rear entrance to the hotel. These are to cater for the additional 28 bedrooms.

6.4 No changes to vehicle access or egress or to the underground servicing are proposed and there are not considered to be any adverse implications for the existing highway network. Access is via airport roads and on-street parking is prohibited on airport roads and via controlled parking on adopted public highway in the vicinity of the airport.

6.5 In light of the reduction in parking and the introduction of trip end restraint, it is anticipated that the proposals will have no significant impact on traffic generation. Notwithstanding this position, a TRICS assessment was carried out to provide very much a worst case traffic generation scenario. The assessment indicated that the 28 bedrooms could have a total of 40 one-way vehicle trips between 0700 and 1900 hours (equivalent of 20 vehicles arriving and departing). The peak hourly flows occur between 0700-0800, 1700-1800 and 1800-1900 hours when there are 5 arrivals or departures. These flows would be small compared to the number of trips, and even daily fluctuation in trips, in the surrounding area and would have an insignificant effect on the highway.

6.6 From the above, it can be seen that the proposed development will not have an adverse impact on the existing highway network and that it complies with the relevant highway, transport and parking development control standards including AM13, AM14, AM15, AM2 and AM7. This report provides the necessary information to demonstrate that the proposed extension to the hotel is an appropriate development from a highway, traffic and transportation perspective.

6.7 Paragraph 109 of the NPPF states: **'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'**. Paragraph 11 of the NPPF states that planning permission should be granted unless '**any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.** Clearly this is not the case in respect to the proposed development.