

Job No: 2022-4801
File Ref: N05-CC-Highways Response 2 D1 (221220)
Date: December 2022
Job Title: Infinite Hayes

Subject: Highways Comment Response Note

1. This Note has been prepared to provide additional information to the London Borough of Hillingdon (LBH) regarding the development proposals for 27 Uxbridge Road, UB4 0JN (Planning Ref: 2385/APP/2022/2952).
2. In the determination of the planning application, LBH Highways have requested additional information to justify the level of car parking proposed. The Applicant welcomes the opportunity to collaborate with LBH and offer additional information and clarification, whereby each comment has been addressed in turn below. The response from LBH is focussed upon two key themes – car parking and the Travel Plan, for which comments have been addressed respectively below.

Car Parking Comments

3. It is noted that LBH Highways have raised an objection to the proposed development owing to a perceived lack of car parking and a perception that there are *"no genuine measures offered to reduce the demand to travel by the private car"*. A detailed consideration to support the level of car parking provided is outlined below, followed by responses to individual comments where necessary.
4. The perception that there are no genuine measures to reduce private car usage are refuted.
5. The proposed development is supported by a comprehensive package of transport measures to provide realistic and attractive alternatives to car travel and align the proposed development with pre-application advice received from the Greater London Authority (GLA) and LBH. A detailed justification and comprehensive assessment of the proposed level of parking and associated measures was set out within the Transport Assessment and is further detailed within this Note.
6. The measures proposed are designed to align with prevailing planning policy and a detailed consideration of the declared Climate Emergency and include the following:

- The provision of a dedicated minibus shuttle service between the Site and public transport services;
 - A notable overprovision of cycle parking above the minimum planning policy standards incorporating cycle hire facilities to greatly improve access to cycling;
 - A commitment to contribute towards providing LBH public cycle hire facilities through collaboration with LBH;
 - The provision of a shared van for business use (akin to a Car Club vehicle) that is exclusive to the development and its occupiers;
 - Dedicated accessible car parking, complemented by some standard car parking and a covered drop-off area to limit car travel to those who need to and must travel in this manner;
 - A financial contribution towards local Active Travel improvements to further improve the attractiveness of walking and cycling; and,
 - Dedicated servicing and delivery space for the hotel and light industrial elements which is appropriately sized and independently accessible
7. The array of measures outlined above is extensive and detailed, forming a comprehensive package of measures which all complement one another to reduce the demand for car travel and underpin the approach to car parking that is proposed. It is unclear how the package of measures offered amounts to being something whereby *"no genuine measures are offered"*.
8. Significant weight should be given to the Greater London Authority Stage 1 report that has been received during the determination of the planning application which states the following with respect to the proposed approach to car parking:
- "There are 70 existing car parking spaces on site. A total of 32 car parking spaces are proposed to be retained, which take the form of 18 standard parking spaces and 14 blue badge parking spaces. Whilst the level of car parking is within the maximum threshold set out in the London Plan, due to location of the site and package of measures put forward by the applicant, a further reduction/removal of car parking spaces would be supported"*.
9. It is evident that the GLA support the level of car parking proposed and would welcome a further reduction in standard car parking given the extensive array of measures proposed. This demonstrates that the package of measures proposed supports a reduced car parking provision and the level proposed.

10. Indeed, the GLA previously stated in response to the approved apart-hotel development adjacent to the site (ref: 69827/APP/2015/4719) that it should be car free on the basis that the scheme was supported by a single minibus despite no information being available regarding what the service will consist of. The proposed package of measures to support the proposed development, including offering a frequent, direct minibus shuttle service and complemented by other measures which goes much further than the adjacent scheme.
11. LBH have inferred that the current level of car parking can be supported by stating: *"The Highway Authority has no objection to a car-free development per se, but it must be supported by a convincing Travel Plan that presents a range of measures that makes public transport and active travel to the hotel as attractive and convenient as making the same trip by private car"*.
12. The Travel Plan that supported the planning application has been updated and resubmitted to respond to the comments raised by LBH. The proposed Travel Plan will be secured by Planning Condition or Section 106 obligation as part of any planning permission whereby it will not be possible to occupy the development until a Travel Plan has been agreed by LBH.
13. This therefore provides a stringent means of ensuring that the Travel Plan must be updated to the satisfaction of LBH prior to the occupation of the new hotel rooms. Thereafter, the Travel Plan will be monitored by LBH annually to ensure it remains up to date and sufficiently detailed. This monitoring is secured by the Section 106 agreement and provides certainty regarding the measures being implemented to satisfy the requirements of the planning permission.
14. Notwithstanding the above, the specific comments raised by LBH with respect to car parking are responded to in turn below.

LBH Comment 1: *The site has a PTAL ranking of 2 bordering 3 indicating that access to public transport is moderate compared to London as a whole, this suggests hotel guests and people working at the hotel/commercial use would to some degree be reliant on the private car for trip making to and from the site.*

15. CA Response: It is recognised that there is a need or desire to accommodate car travel to and from the development as stated at Paragraph 7.26 and 7.27 of the Transport Assessment which reads:

"7.26 It is recognised that travelling by car will remain an attractive means of travel and the only feasible means for some travellers, particularly those with luggage. For prospective guests that require a car, there is a plentiful selection of alternative hotels across the local area which provide ample car parking for this reason. As such, guests will have the clear choice at booking stage, following advanced warnings that car parking is limited and must be pre-booked.

7.27 To complement this approach, a large drop-off facility is proposed which would be able to accommodate the anticipated number of taxi journeys at any time. As such, the proposals continue to fully accommodate vehicular travel, albeit without providing increased car parking".

16. The proposed approach to the transport strategy for the proposed development is underpinned by the need to deliver appropriate opportunities for car travel, albeit this is focussed to a limited number of car parking spaces and combined with an extensive array of public transport measures which are appropriate to the scale and kind of the development to provide realistic alternatives to guests travelling with their own car.

17. **LBH Comment 2:** *Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The published London Plan 2021 Policy T6.4 Hotel and leisure uses requires that the parking standards hotels in locations of PTAL 2 are assessed on a "case-by-case basis and provision should be consistent with the Healthy Streets Approach, mode share and active travel targets, and the aim to improve public transport reliability and reduce congestion and traffic levels".*

The parking standard at the existing hotel is 0.4no. spaces per room, applying the same standard to the proposal would give 174no. parking spaces (435x0.4=174).

18. CA Response: It is agreed that the level of car parking provided must comply with planning law. The proposed level of car parking was developed to reflect the accessibility of the site and the significant sustainable transport package that is proposed and therefore aligns with Policy T6.4 of the London Plan having been developed on a "case by case basis".
19. A detailed and comprehensive justification for the level of car parking proposed was outlined within the Transport Assessment to reflect (a) the extensive array of sustainable transport measures; (b) the improved accessibility of the site created by the minibuss shuttle service; (c) Hillingdon's Climate Emergency; (d) Planning Policy requirements and (e) the implementation of a comprehensive Travel Plan.
20. It is not considered appropriate or reasonable to apply the same standard to car parking as the existing hotel as this takes no account of the proposed measures and simply seeks to reinforce existing travel habits without designing for the desired future as outlined within Paragraphs 7.19-7.22 of the Transport Assessment relating to 'Predict and Provide vs Vision and Validate'.
21. The proposed level of car parking was considered by the GLA against the array of measures proposed whereby it was concluded that a lower level of car parking would be supported, and it is therefore considered acceptable.

LBH Comment 3: *The forecast number of car trips generated has been derived from the number of car parking spaces to be provided, 14no. accessible, 18no. standard giving 32no in total. The applicant then reports that if all car parking spaces were occupied then 7.4% of guests would have arrived by car ($100/435 \times 32 = 7.4\%$). The figure of 7.4% is then halved "to reflect that whilst people who travel to stay at the hotel by car would not use the car for all journeys, and as such a mode share of 3.7% is assumed".*

In simple terms it is claimed that the number of car trips the development would generate and mode split is dependent upon the number of car parking space provided at the final destination. In practice the decision to make a trip by car is dependent upon a combination of many other factors primarily cost and journey time, as well as specific requirements such as the need to carry luggage.

22. CA Response: The hotel will effectively operate as a car-free development, underpinned by the extensive array of measures outlined within the Transport Assessment. Guests will be informed that they cannot drive to the hotel and this will only be permissible where it is booked in advance. To underpin this, stringent management will be put in place whereby parking forms part of the Terms and Conditions of booking and a guest's stay can be terminated if they are found to be parking on-street, for example.
23. This is further reinforced by the comprehensive package of measures proposed including a dedicated minibus service with frequent services to connect to public transport services, a shared cycle hire facility, and complemented by attractive cycle parking. Indeed, as set out within the submitted Transport Assessment, the Applicant acknowledges and accepts that appropriate and reasonable financial contributions will be made towards parking controls within the local area to prevent on-street car parking occurring.
24. If a higher car mode share was adopted, it would represent an unrealistic assessment as it will not be possible for people to drive and would act to reduce the theoretical demand for sustainable modes and underplay the anticipated patronage. This is underpinned by the 'vision and validate' methodology used instead of the traditional 'predict and provide' which is considered in detail within Section 7 of the submitted Transport Assessment.
25. Whilst 7.4% of rooms could theoretically have access to a car parking space (32 parking spaces and 435 rooms), it is not considered plausible or realistic that every trip made by each of these rooms would require the use of the car, as guests will take advantage of opportunities available within the local area and public transport during their stay. Indeed, a car is most likely to be used to arrive at the beginning of their stay and depart at the end.

26. As outlined previously within this Note, it is recognised that car travel will remain an attractive means of travel and the only feasible means for some travellers, particularly those with luggage. For prospective guests that require a car (and car parking), there is a plentiful selection of alternative hotels across the local area which provide ample car parking for this reason. As such, guests will have the clear choice at booking stage, following advanced warnings that car parking is limited and must be pre-booked.
27. To complement this approach, a large drop-off facility is proposed which would be able to accommodate the anticipated number of taxi journeys at any time. As such, the proposals continue to fully accommodate vehicular travel, albeit without providing increased car parking.
28. It is therefore considered that the proposed car driver modal share is robust and appropriate to assess the transport impact of the proposed hotel element of the development and the calculations undertaken within the Transport Assessment is an appropriate basis to assess the transport impacts of the development.

LBH Comment 4: *"The Highway Authority is mindful that a hotel of this size in a location with just moderate access to public transport could be expected to generate a significant number of private car trips which with limited parking on-plot would result in parking being displaced on-street. Based on the existing standard of parking provision, 0.4 spaces per room, there could be parking demand for up to 174no. vehicles, the proposal would provide just 32no. spaces, as short fall of 142no. based on the existing standard. The proposal would effectively be car-free.*

The Highway Authority has no objection to a car-free development per se, but it must be supported by a convincing Travel Plan that presents a range of measures that makes public transport and active travel to the hotel as attractive and convenient as making the same trip by private car. The Travel Plan that has been submitted alongside the planning application has been assessed and found to be lacking in several respects. Throughout the Travel Plan there are general statements about the measures that will be adopted to facilitate travel to the development by means other than the private car. However, there is no detail regarding what or how measures would be delivered, what would be the expected outcome, how would this be monitored and what actions would be taken should the initiative fail to deliver. No evidence is provided to give the Highway Authority confidence that the Travel Plan will deliver public transport use and active travel to and from the site for the lifetime of the development"

29. It is welcomed that LBH believe that the site is suitable to accommodate a car-free development and it is acknowledged that this is on the basis of the delivery of sufficient alternative means of travel to reduce the propensity to travel by car.
30. As has been outlined in detail within this Note and the submitted Transport Assessment, the proposed development is supported by a significant array of measures to make sustainable transport choices as realistic and attractive as possible and combining this with stringent draconian measures to make it clear that car parking without a booking will not be possible nor will it be tolerated.
31. The submitted Travel Plan has been updated and resubmitted to take account of the comments raised by this Note.
32. The proposed Travel Plan will be secured by Planning Condition or Section 106 obligation as part of any planning permission whereby it will not be possible to occupy the development until a Travel Plan has been agreed by LBH.
33. This therefore provides a stringent means of ensuring that the Travel Plan must be updated to the satisfaction of LBH prior to the occupation of the new hotel rooms. Thereafter, the Travel Plan will be monitored by LBH annually to ensure it remains up to date and sufficiently detailed. This monitoring is secured by the Section 106 agreement and provides certainty regarding the measures being implemented to satisfy the requirements of the planning permission.
34. In accordance with Paragraph 55 of the NPPF "local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations". The ability to ensure a more detailed and appropriate Travel Plan is conditioned or secured by S106 provides the security that the level of detail desired can be agreed prior to the occupation of the new hotel rooms.
35. It is noted that LBH have stated that *"Throughout the Travel Plan there are general statements about the measures that will be adopted to facilitate travel to the development by means other than the private car. However, there is no detail regarding what or how measures would be delivered, what would be the expected outcome, how would this be monitored and what actions would be taken should the initiative fail to deliver. No evidence is provided to give the Highway Authority confidence that the Travel Plan will deliver public transport use and active travel to and from the site for the lifetime of the development."*

36. The Travel Plan includes clear commitments to deliver the array of measures which are proposed to serve the development which will be required to be implemented prior to the occupation of the new hotel rooms. For each measure specified, it has been confirmed how the measure will be implemented; how it will be monitored and how it will be remedied if it is unsuccessful.

Travel Plan Comments

LBH TP Comment 1: *There are many aspects in which the Travel Plan fails, the following are just a few examples. The Travel Plan states that the Travel coordinator will make themselves known to all employees but there is no mention of doing the same for guests. This is a significant omission as it is the guests that will be greater in number and most likely to drive given, it is anticipated that they will have travelled a greater distance and be unfamiliar with the local area and transport opportunities*

37. CA Response: The Travel Plan made detailed comments throughout how it relates to staff and guests respectively as it is recognised that the travel habits of every person that visits the proposed development will be required to be given due consideration given the proposed transport strategy. The proposed development is underpinned by a significant array of transport measures.
38. There was a single instance at Paragraph 5.6 where it was stated that all staff will be made aware of the Travel Plan Coordinator and no specific reference to hotel guests was made which has now been rectified with a specific reference added for completeness. The remainder of the Travel Plan specifically mentions guests and staff throughout in detail and it is considered that it is unequivocal that the document was prepared to address both groups of people.

LBH TP Comment 2: *The Travel Plan states that where on-street parking by a guest is found to occur then this could be used to terminate the associated contract. In practice this unlikely to occur, would a family arriving by car and found to be parking on-street really be turned away if they are staying just one night?*

39. CA Response: To ensure that no car parking will occur, it will require a combination of draconian measures to make it clear that car parking will not be tolerated and complementing this with genuine alternatives to car travel to ensure that people can travel without a need to travel by their own car.

40. As outlined within the Transport Assessment and Travel Plan it will be made clear to all prospective guests that car parking will not be permissible in the local area and that any car parking must be strictly pre-booked prior to arrival for the avoidance of any doubt. This will be complemented by appropriate information on sustainable travel options including the bespoke minibus shuttle service and confirmation that guests are welcome to be dropped off and travel by taxi. Indeed, guests will be reminded that there are plentiful hotels across West London that offer car parking at reasonable rates which cater for the full range of budgets and accommodation needs.
41. It will be clearly stated within the Terms and Conditions of staying at the hotel that the hotel is 'car-free' with the exception of strictly pre-booked parking spaces, and, as such, any guests who drive to the hotel and park in the vicinity will break their contract and will not be allowed to stay in the hotel. The Applicant is willing to accept this as an obligation of the S106.

LBH TP Comment 4: *Parking for the businesses that occupy the light industrial uses would be allocated on a "first come-first served basis", this would incentivise people to drive hoping a space would be available upon arrival.*

42. CA Response: The proposed approach to car parking for the commercial units was designed to offer flexibility between the businesses to reduce the number of car parking required as different businesses can flexibly accommodate a different range of needs. However, the Applicant is willing to amend this to restrict car parking to allocated usage only so that everyone who drives must have a valid parking booking prior to arrival.

LBH TP Comment 5: *The applicant mentions that there would be a dedicated mini-bus to chauffeur guests and employees between the site and location destinations, however there is no mention of this mini-bus in the Travel Plan Action Plan.*

43. CA Response: This has been added to the Travel Plan Action Plan.

Summary and Conclusion

44. The Applicant remains committed to collaborating with LBH to resolve matters of clarification and overcome the queries and perceived issues raised. This Technical Note has been prepared to provide the additional information requested whereby it is considered that the original assessment is sufficiently comprehensive to consider the impacts of the development and minor outstanding matters can be readily addressed through planning obligations and conditions.