

To: **Greater London Authority (Transport for London Comments)**
From: **Iceni Projects**
Date: **08/05/2024**
Title: **Post Submission Comments for 3 The Square, Furzeground Way, Stockley Park, Hillingdon**

Dear Sir / Madam,

I write to provide a response to the statutory consultee comments received from *Transport for London* (TfL) dated 22nd April 2024 within the Greater London Authority Planning Report (GLA/2024/0149/S1/01) response in relation to the proposed development at 3 The Square, Furzeground Way, Stockley Park, Hillingdon (*London Borough of Hillingdon planning application ref. 57328/APP/2024/345*).

The proposed description of development is:

“Change of use of existing office building (Use Class E) to a post-operative care facility (Use Class C2), including external works to the building, landscaping, parking, and all associated works”.

The attached schedule responds to the specific questions posed by the consultee.

We trust that the response sufficiently addresses the comments, but please feel free to contact Lee Talbot (ltalbot@iceniprojects.com) should you have any further queries.

LBHF Highways Comments	Applicant Response
<p><u>Site Access</u></p> <p><i>The site access remains as existing, with the use of a one-way system around the building perimeter. The applicant should work with Council highways officers to ensure there are no conflicts between modes regarding the relationship between the proposed garden area, pedestrian and cyclist movements and the access movements. Any safety and traffic calming measures required should be secured by the Council and vehicle access should be designed to prioritise walking and cycling over that of vehicle movement in line with Healthy Streets approach and London Plan Policy T2.</i></p>	<p>This is accepted and will be considered as part of the detailed design process for the Site.</p>
<p><u>Walking, cycling and ATZ</u></p> <p><i>An Active Travel Zone (ATZ) assessment accompanies the application, however given the nature of the site usage, and prevalence of shift workers, whilst some consideration of night-time travel has been provided, no night-time ATZ has been completed. Further thought on this aspect of the proposal is required. It is recommended that a developer contribution, or works in kind, towards delivering improvements against the Healthy Streets criteria is secured, in line with London Plan Policy T2.</i></p>	<p>This is not accepted. The ATZ assessment provided is comprehensive and covers a study area which was pre-agreed by TfL officers in advance of the site visit. Whilst the site visit was not undertaken during hours of darkness, consideration has been given to the existing conditions of each route from the perspective of nighttime travel (for those working evening shift patterns) to the same level of detail as all the key healthy streets indicators. Improvements to enhance conditions during these hours have been suggested where appropriate and feasible.</p> <p>As the assessment indicates, the most likely connection between the Site and Hayes and Harlington train station is considered to be via either the U5 or 350 bus services, which provides a frequent number of door-to-door services (the bus stop is located adjacent to the access of the building) between the two locations throughout the day, particularly during hours of darkness (for ease of access and safety reasons). This is largely due to the 1.8km walking/cycling distance between both locations. As can be seen below, safe transit between the Site and the station during these hours is supported by bus services which run late into the night throughout the week, on both the U5 and 350 routes. Therefore, further improvements outside of that specified within our assessment would be considered unnecessary.</p>

All 350 A10 U5

i This departure information is out of date. Please try reloading the page.

U5	Hayes & Harlington Station	2 mins
U5	Hayes & Harlington Station	19 mins

First and last services, timetables and route details

Monday to Friday

First	05:29	05:44	05:59
Last	23:53	00:13	00:33

Saturday

First	05:29	05:49	06:09
Last	23:54	00:14	00:34

Sunday

First	06:30	07:00	07:31
Last	23:50	00:10	00:30

All 350 A10 U5

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350	Heathrow Airport, Terminal 5	21 mins
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First and last services, timetables and route details

Monday to Friday

First	03:34	04:04	04:24
Last	23:06	23:36	00:06

Saturday

First	03:34	04:04	04:24
Last	23:05	23:35	00:05

Sunday

First	03:34	04:04	04:24
Last	23:05	23:35	00:05

When the study area of this route was scoped with officers ahead of the site visit, it was suggested that particular focus should be given to how conditions along the grand union canal can be improved during hours of darkness. It is reasonable to assume that, due to the lack of natural surveillance that the route receives from its surroundings, this would be an unlikely choice of route for those navigating between the Site and the station during hours of darkness, on the basis that there are other alternatives available which benefit from such natural surveillance, are step free (for cyclists) etc. Investment into improvements such as lighting and/or CCTV surveillance along the canal for such a low level of anticipated footfall associated with the development proposals therefore seems excessive considering the costs that would be involved to implement this over such a long distance.

	<p>Further to this, officers suggested that particular focus should be given to conditions between the Site and the bus stops located within The Square. Stockley Park is a relatively new development in the context of the wider surrounding area which benefits from high quality design and consequently, adequate facilities for pedestrians, particularly along the short routes between the nearest bus interchanges and the building entrance at the Site. Street lighting and CCTV is also present around The Square, so it is difficult to see how conditions can be improved during hours of darkness. It is however recognised that the presence of street lighting and CCTV within the Square may not be clearly detailed within the ATZ assessment so this detail could be added should this be required/necessary. In the same respect, it is acknowledged that, whilst a good level of lighting provision is already present along Route 1 (via Blyth Road and Dawley Road) this is also clearly detailed as existing features that contribute toward providing a safe route option for those traveling to/from the site during the night. This can also be added if required/necessary.</p> <p>Finally, as consultants, we are employed between the standard working hours of 9am - 5pm and therefore, undertaking such a study during hours of darkness is not possible, seems unreasonable and also is not encouraged by our employer due to health and safety risks/concerns. We also understand that TfL is currently in the process of developing guidance on how to carry out such assessments, our position therefore is that this is not required. On this occasion for this reason, we have not undertaken a night-time ATZ.</p> <p>The above provides enough justification around our approach to this ATZ assessment.</p>
<p><i>Cycle parking spaces (includes both short-stay and long-stay), which take the form of Sheffield stands, are proposed, the quantum of which adheres to London Plan Policy T5. This should be secured by the Council. Shower and changing facilities for staff should also be provided for employees to comply with London Plan Policy T5. A financial contribution towards Hillingdon's cycle hire scheme is strongly supported and should be secured by the Section 106 agreement.</i></p>	<p>This is accepted. Any financial contributions will be considered relative to any approval of the planning permission.</p>
<p><u>Signage</u></p> <p><i>Appropriate wayfinding should be provided within the site, for both day and nighttime travel.</i></p>	<p>This is accepted and will be considered as part of the detailed design of the Site.</p>
<p><u>Car parking</u></p> <p><i>The proposal incorporates 249 general car parking spaces (including 12 motorcycle parking spaces) which represents a reduction of 124 spaces from existing on-site provision. Although the reduction is welcomed, for the number of staff and patients and visitors anticipated, the level of car parking is excessive and unjustified. This level of parking is retaining a car-dominated landscape within the red line boundary and is undermining</i></p>	<p>This is not accepted. As outlined in the submitted Transport Assessment, the proposed car park layout will provide for 253 standard car parking spaces including 18 accessible spaces (up to 7%), which will see a reduction of 124 on the current provision (377 spaces).</p> <p>The proposals will see the removal of car parking for additional landscaping, which is welcomed by officers and represents a significant reduction on the current level of parking availability within the Site that is dominated by hardstanding. With an expected net loss of 124 spaces, which represents a 33% reduction, the quantum of parking being provided is not seen as excessive, rather the opposite and should be seen through the optic of the use being proposed - post operative care facility – which is a unique proposal that should be supported and be determined on a case-by-case basis analysis of</p>

<p>efforts to encourage sustainable travel from Stockley Park, contrary to Policy T2 of the London Plan. The Council is strongly encouraged to further pursue a reduction in the quantum of car parking.</p>	<p>the parking requirements. The layout maximises the existing area of hardstanding available within the current arrangement and enables the provision of a new landscaped garden that reduces the dominance of hardstanding but still maintaining a representative quantum of parking for the use class.</p>
<p><u>Disabled Parking</u></p> <p>16 disabled parking spaces are proposed meeting London Plan standards. A minimum of 5% of spaces will be fitted with Electric Vehicle charging, with 5% provided with passive provision. This should be secured, including an applicant commitment to increasing the number of electric vehicles charging spaces over time. Detail of this should be secured within the Parking Design and Management Plan (PDMP) in accordance with London Plan Policy T6. The PDMP should also detail the measures that will be implemented to reduce the impact at shift changeover periods.</p>	<p>Whilst this is accepted, it is important to note that car park will provide for 18 accessible spaces. These spaces can be secured by condition related to the final PDMP, including a commitment to increasing the number of electric vehicles charging spaces over time, when it becomes clear that the need for the infrastructure is appropriate.</p>
<p><u>Operation Ambulance Parking</u></p> <p>An ambulance drop-off space is located to the rear of the building. Details on how this will work, the frequency of expected ambulances and the management of the spaces has been provided within the deliveries and servicing plan to be secured by the Council. No other vehicles will be permitted to use the ambulance drop-off spaces. Signage and other enforcement measures should be used to enforce this.</p>	<p>This is accepted and can be secured by condition related to the final PDMP.</p>
<p><u>Trip generation and mode share</u></p> <p>A multi-modal trip generation assessment has been provided; however, it appears that the impact on the surrounding transport network may be underestimated. The proposed trip generation and strategic mode shift demand may justify contributions to mitigate the impact of, or otherwise support, the development through improvements to walking, cycling, or public transport in line with London Plan Policy T4 and should be secured by the Council.</p>	<p>This is not accepted. The multi-modal trip generation assessment outlines the number of trips relative to the extant office use and the proposed post operative care facility use and it is not seen as an underestimation of users on the public transport network. It can be seen from Figures 7.3 and 7.6 provided in the Transport Assessment, that there is a slight reduction in the multi modal trip generation in the AM peak, particularly on the bus and train, whilst the PM peak remains relatively stable.</p> <p>Importantly, there is also a demand responsive shuttle bus operating between Hayes and Harlington and Stockley Park stopping just outside the Site and provides up to 3 services per hour in the peak hours for staff that can alight the bus for free. Whilst it is clear that there is a net reduction in demand for the specialist post operative care facility, if there was an extra demand placed on these services, it could be covered by the demand responsive shuttle bus.</p>

<p><u>Deliveries and servicing</u></p> <p><i>The proposed delivery and servicing arrangement will be accommodated within the site boundaries in line with London Plan Policy T7. The delivery and servicing statement should provide an operational management plan to be secured by the Council.</i></p>	<p>This is accepted and can be secured by condition.</p>
<p><u>Construction logistics and travel planning</u></p> <p><i>A framework Construction Logistics Plan (CLP) and Travel Plan should be provided to the Council and secured accordingly.</i></p>	<p>This is not accepted as an Outline CLP was prepared as part of the application, with a full CLP being secured by Condition. Stockley Park already has a comprehensive TP which we would be happy to sign up to and therefore this could be secured via Condition that there is buy in from the Applicant for this TP. This can be via a planning agreement entered into under S106 of the TCP Act 1990.</p>
<p><i>Details of the accessible parking provision and how Blue Badge holders can easily access the building should be submitted. Given the intended use of the building, a minimum of 10% of spaces should be designed in accordance with BS8300: 2018.</i></p>	

Iceni Projects
May 2024