

To: **Greater London Authority (Transport for London Comments)**  
From: **Iceni Projects**  
Date: **19/06/2024**  
Title: **Post Submission Comments for 3 The Square, Furzeground Way, Stockley Park, Hillingdon**

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Dear Sir / Madam,

I write to provide a response to the statutory consultee comments received from *Transport for London* (TfL) dated 28<sup>th</sup> May 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><b><u>Site Access</u></b></p> <p><b><i>Site access remains as existing, with the use of a one-way system around the building perimeter. Further information is required regarding the relationship between the proposed garden area, pedestrian and cyclist movements and the access movements. This is to ensure that there are no conflicts between modes in line with the Mayor's Vision Zero. In addition, the applicant is requested to provide specific details regarding the pedestrian and cycle access arrangements, including safety information and any traffic calming measures throughout the site. Vehicle access should be designed to prioritise walking and cycling over that of vehicle movement in line with Healthy Streets approach such as to provide tactile paving in accordance with London Plan policy T2.</i></b></p>	<p>This is accepted and will be considered as part of the detailed design process for the Site.</p>
<p><b><u>Walking, cycling and ATZ</u></b></p> <p><b><i>A Healthy Streets Active Travel Zone (ATZ) Assessment has been submitted to support this planning application. Given the nature of the site usage, and prevalence of shift workers, some consideration of night-time travel has been provided but no night-time ATZ has been completed. Further thought on this aspect, including the carrying out and submission of a night-time ATZ assessment for review, is required prior to determination. This should pay particular attention to Healthy Street indicators 'People feel safe' and 'People feel relaxed', as the factors which form part of the assessment against these criteria may differ considerably at night and can impact on safety, including that of women's safety, and the perception of safety. The revised ATZ should inform further discussions with the relevant highway authority about the contributions, or works in kind, that are to be secured towards delivering improvements against the Healthy Streets criteria, in line with Policy T4.</i></b></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

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

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><b><u>Cycle Parking</u></b></p> <p><b><i>46 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 cycle parking standards T5. Whilst TfL supports the provision of Sheffield stands, the stands should be secured, covered and be design in line with the London Cycle Design Standards (LCDS). Long-stay cycle parking is located within the car park, and it is questioned whether it will be safe, convenient, and attractive for its intended users. It is strongly suggested that the Long stay cycle parking should be located within the basement. Within the LCDS part 8.3.1. it is stated that long-stay cycle parking is best located in a building, for example in a basement parking area, provided the entrance is well overlooked and well lit. Access needs to be considered carefully, particularly for those using non-standard cycles, with clear signing from the main entrance of the building to the parking area. It is recommended that external doors are a minimum of 2 metres wide. Further thought on the location of long-stay cycle parking is required.</i></b></p>	<p>It is noted that 46 cycle parking spaces is accepted by officers.</p> <p>The location is of the cycle parking will continue to be outside of the building and not within the basement as plant equipment and parking will be provided internal to the building.</p> <p>It is acknowledged that LCDS 8.3.1 states that long stay cycle parking is best located in a building, however it does go on to say that 'Where location in a building is not possible, bespoke shelters and lockers are an option, but consideration needs to be given to planning requirements. Cycle parking outside of buildings should be:</p> <ul style="list-style-type: none"> <li>• Sited in locations that are clearly visible and well overlooked with high levels of natural surveillance, and CCTV where necessary;</li> <li>• Designed with consideration of sight lines into and out of the cycle cages, compounds or secure store; and</li> <li>• Adequately lit and overlooked, particularly at night-time or where the parking is under cover.</li> </ul> <p>This will be considered as part of the detailed design process for the Site.</p> <p>Access will be considered relative to LCDS 8.2.1, and external doors will be a minimum of 2.0m wide.</p>

<p><b><u>Cycle parking</u></b></p> <p><b><i>Shower and changing facilities for staff should also be provided for employees to comply with London Plan policy T5.</i></b></p> <p><b><i>A financial contribution towards Hillingdon's cycle hire scheme is strongly supported and should be secured by the appropriate legal mechanism.</i></b></p>	<p>Shower and changing facilities for staff will be considered as part of the detailed design work.</p> <p>This will need to be discussed with LBH as they have asked the Applicant to contribute to the cycle hire scheme under the Section 106 which is currently under discussion. It is important to add that there is a bike hire available within Stockley Park itself for general use.</p> <p>We do question how the Santander Docking Station financial contribution would work, as I am not aware of an existing one close to the Site. It would be interesting to understand LBH intentions on this. For the docking station to work, it is all about the network. If the next closest docking station appears to be about 17km, that just won't work. From memory you need to have 4 or 5 in an area otherwise the dock just ends up empty.</p>
<p><b><u>Signage</u></b></p> <p><b><i>Appropriate wayfinding should be provided within the site, for both day and night-time travel. Access routes between all disabled parking and main entrances should be revised to be continuous, step-free and direct. It should be ensured that all pedestrian routes within the site will be safe and attractive to use at all times. This is promoted within the Good Growth by Design Charter which aims to enable everyone to fulfil their potential, by providing inclusive access to transport and other public services, by ensuring that communities see the benefits of growth, and by enabling broader public participation in how the city changes.</i></b></p>	<p>This is accepted and will be considered as part of the detailed design of the Site.</p>
<p><b><u>Car parking</u></b></p> <p><b><i>A total of 249 general car parking spaces (including 12 motorcycles parking spaces) is proposed, which represents a reduction of 124 spaces from existing on-site provision. Whilst the reduction is welcome, for the number of staff and patients and visitors anticipated, the level of car parking is excessive and unjustified. In line with Policy T6, car-lite development should be the starting point for all outer London developments. Throughout the Transport Assessment, the applicant has highlighted the sites proximity to public transport infrastructure, in particular the provision of a shuttle bus. Noting the aforementioned, there is a concern that the level of parking at</i></b></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 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><i>this site will not support a strategic modal shift in line with Policy T1, is creating a car-dominated landscape within the red line boundary and is undermining the efforts to encourage sustainable travel from Stockley Park. A reduction in the quantum of car parking is therefore sought.</i></p>	
<p><b><u>Disabled Parking</u></b></p> <p><i>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. The applicant should commit 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.</i></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><b><u>Operation Ambulance Parking</u></b></p> <p><i>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. No other vehicles will be permitted to use the ambulance drop-off spaces. Signage and other enforcement measures should be used to enforce this.</i></p>	<p>This is accepted and can be secured by condition related to the final PDMP.</p>
<p><b><u>Trip generation and mode share</u></b></p> <p><i>A multi-modal trip generation assessment has been provided. It is noted that the proposal is anticipated to represent a reduction in overall peak trips from the existing office use. Noting the 24/7 operation of the proposed development, a trip profile which covers a 24 hour period should be provided – the trip generation assessment included in the submitted Transport assessment only covers the peak periods.</i></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.</p> <p>It can be seen from <b>Figures 7.17</b> provided in the Transport Assessment, that there is a reduction in the multi modal trip generation in the peaks, particularly on the bus and train.</p> <p>Importantly, there is a net reduction in demand for the specialist post operative care facility compared with the existing office use. This is coupled with a 33% reduction in the quantum of car parking spaces provided on Site, which is a significant reduction compared to the extant use class.</p>

<p><b><i>There is a concern that the impact of the proposed development on the surrounding transport network is being underestimated due to the assumptions being applied to the trip generation assessment.</i></b></p> <p><b><i>The trip generation information assumes that all staff will drive to the site. This is at odds with the assumption that 20% of visitors would reach the site by public transport, given the level of car parking provided for visitors it unclear if these numbers are being underestimated. The assessment does not provide any information about what percentage of staff would use the Stockley Park Minibus service.</i></b></p> <p><b><i>The updated 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 Policy T4.</i></b></p>	
<p><b><u>Deliveries and servicing</u></b></p> <p><b><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. Swept path analysis for all bays in use are required. The applicant has provided details on all the type of vehicles that could visit this site, how they will move in, out and within the site and the routes that they will take to access the site, to satisfy London Plan policies T3, T4 and T7 with tracking provided.</i></b></p> <p><b><i>In line with the Mayor's Vision Zero approach, it should be ensured that all vehicles can enter and exit the site in a forward gear, and appropriate management and design measures are implemented to ensure that there is no conflict between different vehicles. Contingencies will be needed if emergency vehicles are unable to stop within the dedicated area A final Delivery and Servicing Plan should be secured by condition, in line with London Plan policy T7.</i></b></p>	<p>This is accepted and can be secured by condition.</p>

<p><b><u>Travel Planning</u></b></p> <p><b><i>The applicant has not provided a draft Travel Plan. This should be provided prior to any decision being made and should set out mode share targets for all intended users of the proposed development with detail the measures that will be implemented to facilitate the delivery of these targets. The Travel Plan targets should support achieving a strategic modal shift in line with Policy T1. The final Travel Plan should be secured by legal agreement.</i></b></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>
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Iceni Projects  
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