

Transport Response Note
January 2024

EAS

NNR House

Stanwell Road, Feltham

NNR Global Logistics UK Ltd

Document History

JOB NUMBER: 4633/2023
DOCUMENT REF: Transport Response Note
REVISIONS: B – Client Issue

Revision	Comments	By	Checked	Authorised	Date
A	Client Draft	JM	PE	PE	18/12/2023
B	Client Issue	JM	WH	PE	03/01/2024

This document has been prepared for the sole use of NNR Global Logistics UK Ltd. Its content should not be relied upon by others without the written authority of EAS Transport Planning Ltd. If any unauthorised third party makes use of this report they do so at their own risk and EAS Transport Planning Ltd owe them no duty of care or skill.

The content of this report is based on information available as of January 2024, the validity of the statements made may therefore vary over time as planning guidance and policies as well as the evidence base change.

Contents

1	Introduction	1	4	Types of Parking Provision and EV Charging Points	13
	The Site	1		Disabled Parking	13
	The Scheme	1		Motorcycle Parking	13
	Highways Comments to the Planning Application	1		Electric Vehicle Charging Infrastructure	13
	TfL Comments to the Planning Application	5		Cycle Parking	13
	Additional Comments from LBH	7	5	Summary and Conclusions	15
	Aims and Structure of this Report	7		Summary	15
				Conclusion	15
2	Site Access	8		Appendices	16
	Site Access Outside Red Line Boundary	8		Appendix: A - Location Plan	
	Alternative Access Arrangement and Parking Options	8		Appendix: B - Revised Masterplan	
	Access by Servicing Vehicles	9		Appendix: C - Off-site Parking Discussions	
3	Highway Capacity Impacts and Travel Plan	10		Appendix: D - Swept Path Analysis	
	Trip Generation and Car Parking Capacity	10			
	Active Travel Zone Assessment	10			
	Travel Plan	11			

1 Introduction

- 1.1 This Transport Response Note has been prepared by EAS Transport Planning Ltd on behalf of NNR Global Logistics UK Ltd (hereinafter referred to as the 'client') regarding the proposed redevelopment of NNR House, Stanwell Road, Feltham (hereinafter, the 'site').

The Site

- 1.2 The site under consideration is located within an industrial and warehousing area, set just outside and to the south-east of Heathrow Airport. The full address of the site is NNR House, Stanwell Road, Feltham TW14 8NG.
- 1.3 The site is set at the south-western corner of the London borough of Hillingdon ('LBH'), who therefore act as the local planning authority, as well as the local highway authority.
- 1.4 A map showing the location of the site is contained at **Appendix A**.

The Scheme

- 1.5 It was therefore proposed under LBH planning reference 57744/APP/2023/2517, to replace the existing NNR House building with a more up-to-date premises, in line with the company's growth in the UK.
- 1.6 The scheme thereby proposes the development of 1,273sqm of Warehousing space (Use class B8), 535sqm of Office space (use class E(g)(iii)), 295sqm of Service Areas and 56sqm of Staff Facilities.
- 1.7 It is also proposed to re-arrange the site car park around the proposed structures on the site, to include 38 car parking spaces, as well as 11 long-term and 3 short-term cycle parking spaces.
- 1.8 Further to the submission of these proposals for planning, the architects have since updated the scheme, in line with LBH's and TfL's comments.
- 1.9 The amended site plans are contained at **Appendix B**.

Highways Comments to the Planning Application

- 1.10 As stated above, following the submission of the planning application documentation, LBH Highways have provided the following comments:

"Site Description"

The application site is located on a cul-de-sac spur known as Bedfont Cross which lies off the northern side of Stanwell Road, a dual carriageway road with a 50mph speed limit, which is part of London Borough of Hounslow, and lies to the east of the junction of A30 Great South West Road, a Transport for London (TfL) road. TfL should be consulted.

The application site is located in an area with a PTAL ranking of 1a indicating that the proposal would be located in an area with very poor access to public transport that fails to concur with The Mayor's Transport Strategy (2022) which aims to encourage more people

to walk, cycle and use public transport and NPPF 9: Promoting Sustainable Transport (2021) suggesting that there would be a reliance on the private car for trip making to and from the site and NPPF 9 Promoting Sustainable Transport.

Access

The application proposes to extend and refurbish the existing offices and warehouse to provide 1273m² warehouse and 886m² office and ancillary use area. Access to the application site will be gained from Bedford Cross with cars gaining access over a new vehicular access which will be provided to the west of the site, however, the red line for the site runs through the access and will need to be amended. HGVs would gain access over a vehicle crossover to the east of the site in the location of the existing combined access. Separation of access for cars and HGVs is an improvement on the existing layout and will be acceptable. The proposed access would need to be constructed under S184 Highways Act 1980 at the applicant's/ developer's expense.

Drawing 4633 SK03 title Site Access Visibility Splay shows visibility from the 2no. accesses which will be acceptable.

Drawing 4633 SK02 REVB titled Swept Path Analysis of a 16.5m Articulated Vehicle & a 12m Rigid Vehicle Turning within the Servicing Area comprises 2no. drawings:

- The top drawing titled 16.5m Articulated Vehicle Reversing into Warehouse Docking bay shows the track of the vehicle reversing into the western docking bay with the eastern docking bay vacant which is not acceptable. Revised drawings should be provided showing a 16.5m HGV reversing into the western docking bay with a 16.5m vehicle docked in the eastern docking bay and a 16.5m HGV reversing into the eastern docking bay with a 16.5m vehicle docked in the western docking bay.*
- The bottom drawing titled 12m Rigid Vehicle reversing into Warehouse Docking Bay clearly shows the design vehicle reversing into the eastern docking bay and clearly shows that the wheels of the design vehicle would encroach upon the adopted highway verge which is not acceptable. The tracking also shows that the design vehicle reversing into the eastern docking bay would be likely to collide with a 16.5m HGV if docked in the western docking bay. Revised drawings should be provided showing a 12m Rigid Vehicle reversing into the eastern docking bay with a 16.5m HGV docked in the western docking bay and a 12m Rigid Vehicle reversing into the western docking bay with a 16.5m vehicle docked in the eastern docking bay.*

The applicant has noted in the Transport Statement ref 4633/2023 Rev A - Client Draft Paragraph 2.31 that London Borough of Hillingdon Local Plan Part 2 - Development Management Policies - Table 1: Parking Standards states 'For road layouts, swept path analysis must include 300mm error margins around the body of the vehicle. This should be satisfactorily accommodated within the existing and proposed road layout'. Revised drawings should therefore concur with this requirement of the adopted Local Plan and clearly show a 300mm margin around the body of the design vehicle.

Concerns are also raised regarding pedestrian access to the site. Drawing 237-210 titled Site Plan as Proposed shows the proposed car park entrance with a sliding gate providing access to the car park and main reception, however, the access is not entirely within the red line of the site which is not acceptable. The proposed access will be 4.7m wide which should be widened to 4.8m to concur with Manual for Streets Figure 7.1 which illustrates what various carriageway widths can accommodate. The Transport Statement Paragraph

4.18 states 'A Swept Path Analysis showing two cars using the new access simultaneously is contained at Appendix I', however, Appendix I contains swept path analysis for HGVs. A swept path analysis showing 2no. large cars passing will be required.

The adopted footway from the bus stop on Stanwell Road terminates opposite the car park entrance but does not extend beyond the tangent point to the radius requiring pedestrians to walk out into the car park entrance coming into conflict with vehicles which fails to concur with the Mayors Transport Strategy and NPPF 9 Promoting Sustainability which requires priority to be given to pedestrians and cyclists. Revised drawings will be required which should clearly show a widened vehicle access with pedestrian access from the adopted highway to the main reception of the site.

Highway Capacity

The applicant has submitted a TRICS analysis to obtain an estimate of the number of additional vehicle movements that are likely to be generated by the proposed development and has identified the Sky Headquarters as a similar site in Outer London with a PTAL ranking of 1 or 2 which is acceptable.

The Transport Statement Table 5.2 Development Traffic Movements (Office) from TRICS shows that an additional 2no. vehicle movements in the am peak and 2no. vehicle movements in the pm peak. Table 5.4 Development Traffic Movements (Warehouse) from TRICS shows that an additional 2no. HGV movements in both the am and pm peaks would be likely to be generated by the development which would be unlikely to impact upon the highway capacity or free flow of traffic on the local highway network and would be acceptable, however, concerns are raised regarding the TRICS output as the application form states that there will be an additional 23no. employees working at the site with 6no. additional car parking spaces and 621m² following the proposed development which, particularly given the very poor PTAL, would be likely to generate more than 2no. vehicles in the am and pm peaks. Revised details will be required.

Travel Plan

The applicant has provided a Travel Plan to support the proposal which contains targets for reducing the number of car trips that the development generates and sets out those measures that will be implemented to achieve these. The Travel Plan ref 4533/2023 dated August 2023 Paragraph set out the proposed targets for years 3 and 5 based on the baseline survey, however, The Mayor's Transport Strategy which aims for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041 requires aims for the Travel Plan to show and agree targets for years 1, 3 and 5. Revised targets will therefore be required.

As surety that the Travel Plan will be implemented and targets achieved, the Highway Authority requires that the developer provides a £20,000 bond which the Highway Authority will use to implement the Travel Plan should the Travel Plan not be delivered which should be secured by way of a S106 agreement. Should the Travel Plan be successfully delivered the bond will be returned.

Parking

Drawing 237-210 Site Plan as Proposed shows the proposed car parking layout comprising 38no. parking spaces, however, 17no. spaces are located outside the red line of the site which is not acceptable. The Transport Statement Paragraph 4.26 Car Parking states that

the applicant has a written agreement with the wider land owners (formerly known as BAA plc) to use the strip of land for parking, however, this is not acceptable and the applicant should submit a revised drawing showing the parking within the red line of the site and amending the application form accordingly.

The published London Plan 2021 has no specific policy for Use Classes Order B2 (General Industry) and B8 (Storage and Distribution) though Policy T6.2 Office Parking advises that these employment uses should have regard to Policy T6.2 Office Parking and take into account the significantly lower employment densities of such developments. Taking into account the sites low PTAL score, the London Plan would allow a maximum of 44no. car parking spaces, the 38no. proposed is therefore in accordance with these standards and could be accepted.

The London Plan Table 10.6 - Non-residential disabled persons parking standards requires that 5%of spaces should be designated bays with a further 5%of spaces being enlarged spaces. The application proposes to provide 6no. designated spaces which will be acceptable, however, 2no. spaces could be provided as enlarged spaces and designated in the future if required.

The LBH Local Plan requires that 5% spaces should be motorcycle spaces. 2no. motorcycle spaces should be provided which should be fitted with ground anchors.

Electric Vehicle Charging Points (EVCPs)

The published London Plan (2021) requires that 20% of car parking spaces should have active EVCPs and 80% of car parking spaces should have passive EVCPs which should be shown on a revised drawing submitted with any full application.

Cycles

The published London Plan Table 10.2 - Minimum Cycle Parking Standards requires the following cycle parking:

- Office 1 long term cycle parking space per 175m² = 5
 1 short term cycle parking space per 500m² = 2
- Warehouse 1 long term cycle parking space per 500m² = 3
 1 short term cycle parking space per 1000m² = 1

The unreferenced, undated Design and Access Statement Page 9 drawing titled Site Plan as Proposed Showing Parking and Access shows that 9no. long term and 5no. short term cycle parking spaces will be provided which is an acceptable level of cycle parking, however, the long term cycle parking spaces should be relocated closer to the main reception in a position receiving natural surveillance. All long stay cycle parking spaces should be accessible, sheltered, and secure, for short stay parking Sheffield Stands are satisfactory. Full guidance is provided in the Transport for London Cycle Design Standards.

Recommendation

There are highway objections to this proposal but the Highway Authority would be prepared to revise this decision subject to the applicant submitting to the Council revised drawings and information to address the above issues."

- 1.11 A meeting between the clients, the architect and design team, as well as the LBH Planning and Highways teams was undertaken on Thursday the 2nd of November 2023. The above comments were further discussed, and further clarifications were provided on a number of these matters.

TfL Comments to the Planning Application

- 1.12 Furthermore, Transport for London ('TfL') have also added their feedback in December 2023:

"Healthy Streets and Active Travel:"

- *As identified in Policy T2 of the London Plan, all developments should seek to deliver improvements that support the Mayor's Healthy Streets approach. The Healthy Streets approach seeks to improve air quality, reduce congestion and make attractive places to live and work. There are ten Healthy Streets indicators which put people and their health at the heart of decision making and aim to result in a more inclusive city where people choose to walk, cycle, and use public transport.*
- *The application has not submitted an Active Travel Zone (ATZ) Assessment. TfL request that as a minimum a light touch ATZ assessment is conducted in line with TfL guidance and prior to the determination of this application.*

Trip Generation:

A TRICS survey has been provided. Given the existing use, a travel survey should be conducted which will better reflect trip movements to and from the site. An existing survey should also be undertaken at the site and this data used to estimate the additional number of trips that could be generated by the proposed extension. This data could then be used to review the Travel Plan targets.

Cycle Parking:

Office cycle parking requirements are 1 space per 150sqm. This application would require 4 long stay spaces

B2 and B8 1 cycle parking requirements are 1 spaces per 500sqm. This application would require 3 spaces (including the service and staff areas)

The quantum of long stay and short stay cycle parking is compliant against London Plan Policy T5. The application proposes a total of 9 long stay cycles which are to be located externally within the car park. As highlighted within London Cycle Design Standards, long-stay cycle parking is best located within a building. Where it has been robustly demonstrated that this is not possible, bespoke shelters are an option and these should be:

- *Clearly visible and well overlooked with high levels of natural surveillance*
- *Designed with consideration of sight lines into and out of the cycle cages, compounds or secure store*
- *Adequately lit and overlooked, particularly at night-time*

There is also a concern that there may be a conflict between the cycles and vehicles using the car park given the location of the cycle parking and the lack of protection given.

Car Parking:

The application proposes 38 car parking spaces, including 6 disabled persons parking bays this has been agreed with by LBHs highway officers prior to submission. The London Plan states that 1 space for every 100sqm of office space and that for industrial use parking should be on a case by case basis with the starting point being office use parking standards. The total sqm of the site is 2,159sqm, therefore, the total maximum car parking this site should provide to be compliant with the London Plan is 21 car parking spaces. TfL request a reduction in the proposed number of car parking spaces. In addition there does not appear to be any Electric Vehicle charge points (EVCP). As stated in the London Plan 20% of all car parking should be provided with active EVCP and 80% with passive.

TfL request a reduction in car parking spaces and the provision of 20% Active EVCP and 80% passive.

Travel Plan

A travel plan has been submitted for review. The following are the Targets provided within the Travel Plan

- *Reduce the proportion of SOV (Single occupancy vehicles) trips made by staff employed at the clients premises by 5% of all trips in year 3 and by another 4% in year 5 (up to 9% in total)*
- *Increase the proportion of employees walking, whilst commuting to and from the clients premises by 1% in year 3 and another 1% by year 5 (overall a 2% increase)*
- *Increase the proportion of employees cycling, whilst commuting to and from the clients premises by 1% in year 3 and another 1% by year 5 (overall a 2% increase)*
- *Increase the proportion of employees using public transport modes, whilst commuting to the clients premises by 3% in year 3 and another 2% by year 5 (overall a 3% increase)*

The travel plan has identified the above targets and provided measures to reach those targets for walking, cycling, and public transport. However, there does not appear to be a measure related to reducing SOV trips. Measures should be provided which could include promotion of car-sharing between workers and car parking spaces for car-sharing. TfL would also expect that to reduce SOVs and increase cycling the applicant should provide cycle lockers and showering facilities included in the scheme.

Deliveries and Servicing

Deliveries and servicing is to continue as existing. Given the increase in size of this re-development this is acceptable to TfL.

Construction

A draft construction logistics plan has not been submitted to support this application. TfL would expect that a full CLP was secured by condition."

Additional Comments from LBH

- 1.13 Finally, some additional comments have again been provided by LBH Case Officer on the 3rd January 2024:

“The adopted footway from the bus stop on Stanwell Road terminates opposite the car park entrance but does not extend beyond the tangent point to the radius requiring pedestrians to walk out into the car park entrance coming into conflict with vehicles which fails to concur with the Mayors Transport Strategy and NPPF 9 Promoting Sustainability which requires priority to be given to pedestrians and cyclists. The applicant would therefore be required to enter a 1990 Town and Country Planning Act s.106 legal agreement for a contribution of £31,000 towards the extension of the existing adopted footway, provision of uncontrolled pedestrian crossing facilities and improvements to the footway to encourage pedestrian trips and the use of public transport which would concur with the published London Plan (2021) Policy T2: Healthy Streets and would concur with Transport for London (TfL) comments dated 21 November 2023 which requested that ‘as a minimum a light touch ATZ assessment is conducted in line with TfL guidance and prior to the determination of this application’”

Aims and Structure of this Report

- 1.14 This Transport Response Note has been prepared to review and respond to the comments made by LBH Highways, and explain the amendments made to the original planning submissions, to mitigate these objections.
- 1.15 The contents of this report are:
- Section 2 – reviews the comment made regarding the site access arrangements;
 - Section 3 – explains the expected trip generation and expected travel mode share with the redeveloped site;
 - Section 4 – reviews the amended cycle and car parking provision, including the EV charging facilities provided as part of the scheme; and
 - Section 5 – concludes the statement.

2 Site Access

- 2.1 The first sub-set of comments within the LBH Highways Comment relate to the site access arrangements and the boundary of the site.

Site Access Outside Red Line Boundary

- 2.2 The first point of objection raised was that the newly proposed site access was set outside the red line boundary, and within land which is currently leased but not owned by the client.
- 2.3 This land in question is leased from the land ownership of the wider Heathrow Airport complex, and is part of an unused service path between Heathrow Terminal 4 and the undeveloped land to the south of Stanwell Road.
- 2.4 This service path is bound on either side by industrial and commercial units, set on the triangular wedge of land between Longford River to the north, Stanwell Road to the south, and Great South-West Road (A30) to the east.
- 2.5 This service path is currently used for parking and open-air storage by the different facilities, as required by each business' operational requirement. In the case of the site under consideration, this area is used for parking.
- 2.6 Being a service path, the Airport Holding Group do not allow the long-term lease allocation of this area for the nearby leaseholders who lease the surrounding areas. Having said so, this arrangement has been ongoing for decades, and it is not anticipated that this land will ever be required for any other use.
- 2.7 It is accepted that a certain element of uncertainty will remain perpetuity when part or all of a development site is proposed on a leased parcel of land. Naturally, as times change and living and working arrangements change, some internal amendments will naturally be made over time, but it is accepted that the lease over part of the site granted by the wider Heathrow complex ownership is not very long.

Alternative Access Arrangement and Parking Options

- 2.8 Being under temporary control the client has accepted that the long-term availability of this area remains under third-party control, and that in the unlikely case that the leaseholder requires the land, circa 19 car parking spaces would be lost.
- 2.9 In that case the client retains the option of taking access into the main site car park via the existing eastern access, from where a secondary gate is retained as part of the proposals.
- 2.10 Whilst the shortfall in parking numbers will require accommodation of these spaces at alternative nearby sites, considering the large numbers of parking spaces available nearby this is not considered a major issue.
- 2.11 In this regard, based upon the discussions with LBH, the client has already obtained a preliminary agreement for 20 additional spaces to be leased at the neighbouring site.
- 2.12 Two positive email discussions, undertaken by the client, confirming the availability of local parking spaces available for lease have therefore been completed. These options would be

activated when the staff numbers visiting the site exceed the available parking on site. These discussions are contained at **Appendix C**.

Access by Servicing Vehicles

- 2.13 The comments also continue to state that the Swept Path Analysis included within the submitted Transport Statement is not complete, since these do not show all potential turning requirements by large HGVs into the servicing bays at the eastern side of the site.
- 2.14 It is worth adding that the proposals do not include major amendments from the existing situation, and that these movements are existing operational arrangements.
- 2.15 In any case, the Swept Path Analysis drawings have been updated to reflect the full suite of movements that would be anticipated at the site, using both a 12m rigid vehicle and a 16.5m articulated vehicle.
- 2.16 The revised Swept Path Analysis drawings are contained at **Appendix D**.

3 Highway Capacity Impacts and Travel Plan

- 3.1 The second set of comments by LBH Highways and TfL relate to the Trip Generation section of the submitted Transport Statement report.

Trip Generation and Car Parking Capacity

- 3.2 The proposed scheme includes an increase in Gross Floor Areas of 264sqm of office space, 295sqm of service areas, 56sqm of staff facilities, and 538sqm of warehousing space, for a total additional floorspace of 1153sqm.
- 3.3 The proposed scheme therefore includes larger GFAs than the existing floor areas on site, and the proposed parking on the site is not proposed to be significantly increased, with an overall increase of 6 spaces.
- 3.4 It is accepted that the proposed parking provision is not being increased in line with the proposed increase in office and warehousing space, even if the overall increase is not major.
- 3.5 Having said so, being a commercial operation, and with on-site parking being able to be controlled by staff management, the use of each parking space can therefore be allocated to staff as required by operational requirements of the business.
- 3.6 Staff can therefore be restricted from attending to the site by the private car, and be asked to use alternative means of travel to commute to and from the site.

Active Travel Zone Assessment

- 3.7 TfL comment that an Active Travel Zone ('ATZ') Assessment has not been undertaken to support the planning process, and that they would have expected a light touch ATZ Assessment to be undertaken within the Transport Statement.

It is however worth noting that the scheme at hand is a relatively minor development, set within a low PTAL setting. The potential for trips undertaken by active travel modes is therefore limited. The intensification of development basically consists of 264sqm of office space, 295sqm of service areas, 56sqm of staff facilities, and 538sqm of warehousing space. This relative increase of floor space is small, and nowhere near the thresholds whereby an ATZ Assessment would be required.

- 3.8 Therefore, whilst the redevelopment of the site will generate some new trips, considering that this is minimal (under 10 new trips), it seems a bit of a waste of resources, as compared to other investments which the client may undertake on the Travel Plan, for example.
- 3.9 It is however noted above that the LBH Case Officer requests a planning contribution of £31,000 to extend the footway outside the site, as an improvement to the local walking infrastructure. This would be secured via a planning contribution mechanism as part of the Section 106 legal agreement. It is not clear as to what extent of work these costs would cover.

- 3.10 This level of contribution is overall considered to be excessive, in light of the expected scope of the above discussed work, which will just require extension of the existing footway on the southern side of Bedfont Cross by a few metres, and the installation of a drop kerb facility on either side of the road, to provide a safe crossing point between the existing footway on Stanwell Road (near the bus stop) and the site access.
- 3.11 The limitation to the footway extension work is therefore sought in this case. Considering the proposed footway extension, the need for the above-mentioned light-touch ATZ Assessment, would be considered as redundant.
- 3.12 Ultimately, this is a commercial development, and budgets remain capped. The minor nature of the scheme does not allow for significant off-site improvements, which would otherwise make the development commercially unviable.
- 3.13 Furthermore, looking at the site, the only reasonable active travel routes from the site are to the bus stops outside the site, and across the A30 to the shops at Bedfont Green (half a mile walk). The former route is very short, and only used by a handful of people per day. The latter route is naturally busier from a point across the A30, as you walk into the residential areas.
- 3.14 It is therefore concluded that it would not be reasonable to undertake this assessment, and resources are focused elsewhere on this planning proposals, such as on the Travel Plan.

Travel Plan

- 3.15 In regard to the above, it is agreed with LBH Highways that the Travel Plan ('TP') process remains the best tool to limit commuting trips to and from the site by car. In particular, Single-Occupancy Vehicle ('SOV') trips, do generate higher demand for on-site parking, and as such, the reduced car parking provision remains the ultimate reason, as to why a restriction to the overall demand for car trips to and from the site will be necessary.
- 3.16 In this regard, the client has noted that they already operate a Working from Home arrangement within the business, in line with their ISO 14001 accreditation.
- 3.17 The clients are also committing to provide a commuter mini-bus service from the nearby key transport nodes at Heathrow Airport, to enable staff to commute to and from the site by public transport.
- 3.18 Based upon the above discussion regarding alternative parking arrangements, the client is also committing to bringing a commuter mini-bus service once off-site parking is required.
- 3.19 It is therefore proposed that once the number of on-site employees exceeds 50 or the demand for parking spaces available within the site, the commuter mini-bus service is also extended from the local station, which would operate at set times during the peak periods in the morning and evening, collecting staff from the station in the morning and dropping them back after work.
- 3.20 In terms of the Travel Plan targets, further to the discussion between the LBH, the client, and the working team, it has been agreed that the TP targets are updated to follow the similar net change in SOV trips as adopted within the Mayor's Strategy and set out within the London Plan.

- 3.21 In this regard, it is noted that the Mayor's 80% Target is set out within Transport Policy T1 of this Plan. This policy guidance notes continues to add different policy targets between Central London, Inner London and Outer London Boroughs. These are depicted within Figure 10.1 of this document.
- 3.22 For Outer London, the policy's ambition is therefore to increase the percentage of sustainable trips from 60% in 2015 to 75% by 2041. This equates to a 25% increase in trips made by sustainable modes, as compared to current levels.
- 3.23 Therefore, considering the low existing number of non-car trips are locally, we propose that a fair compromise would be to recommend TP targets which would decrease the number of SOV car trips by this same 25% margin. This would therefore target reducing the SOV percentage at the site to drop from the 83% surveyed within the latest census to 62% (at the end of the 5-year Travel Plan period).
- 3.24 It is worth adding that these latter figures are based upon the travel mode data for the local area, and will be updated once a full survey of the existing staff commuting patterns can be surveyed (via a Staff Questionnaire) and the Framework TP is adopted into a Full TP.
- 3.25 A revised version of the Framework Travel Plan report has therefore been submitted with this report.

4 Types of Parking Provision and EV Charging Points

4.1 It is noted within LBH's Comments that the overall 38 car parking spaces are considered acceptable. Whilst TfL consider this level of parking in excess of the London Plan, it is accepted that local policy is considered more appropriate in this location.

4.2 Comments are however made on the specific allocation of different types of parking.

Disabled Parking

4.3 It is noted within the LBH comments that the London Plan proposes the use of both allocated disabled spaces as well as enlarged spaces (for future conversion into disabled spaces).

4.4 The comments are agreed, and it is proposed that rather than providing 6 disabled spaces, the car parking area will include 4 disabled spaces and 2 enlarged spaces.

4.5 The two disabled parking spaces at the rear of the site are therefore converted into enlarged bays.

Motorcycle Parking

4.6 LBH also add that the London Plan required 5% provision of Motorcycle spaces.

4.7 2 Motorcycle anchors are provided at the rear of the site, near the rear Warehouse access point.

Electric Vehicle Charging Infrastructure

4.8 A further comment was also made in regard to Electric Vehicle ('EV') Charging infrastructure, in that 20% should include active Charging Points, whereas the remaining 80% are to include active infrastructure.

4.9 This recommendation is agreed, and EV Charging points have therefore been extended to serve 7 parking spaces, with the remaining 31 parking spaces to include the ducting and space necessary to install charger units in the future.

Cycle Parking

4.10 Both TfL and LBH also comment on cycle parking.

4.11 The LBH comment noted that the proposed Offices should include 1 long-term cycle parking space per 175m² of floor area (which equates to 5 long-term spaces, as well as 1 short-term cycle parking space per 500m², which correlates to 2 short-term spaces).

4.12 Similarly, the proposed Warehouse space is expected to 1 long-term cycle parking space per 500m² (i.e., 3 long-term spaces), and 1 short-term cycle parking space per 1000m² of floor area (1 short-term space).

4.13 The above requirements therefore equate to an overall 8 long-term and 3 short-term cycle parking spaces.

- 4.14 TfL also add that the originally proposed located of the cycle storage was not clearly visibly, which brings security risks to holding bikes in this location.
- 4.15 It is worth adding that within the revised site layout these short-term cycle parking spaces are provided at the front of the site, near the main entrance on Sheffield stands, whereas the long-term parking spaces are located within a cycle store set next to side the lobby and stairwell area.
- 4.16 The provision of cycle lockers and showering facilities is also included within the revised Travel Plan.

5 Summary and Conclusions

- 5.1 This Transport Response Note has been prepared by EAS Transport Planning Ltd on behalf of NNR Global Logistics UK Ltd regarding the proposed redevelopment of NNR House, Stanwell Road, Feltham.

Summary

- 5.2 The applicant has received transport feedback from both LBH and TfL, as part of the standard planning process. In this regard a number of comments have been addressed within the revised proposals submitted by the architects. A revised Travel Plan is also being submitted to allow for these comments.
- 5.3 Amendments to the site access points are undertaken in line with these comments, including the widening of the main access point to 4.8m, and slight amendments to the servicing access to permit easier access by HGVs.
- 5.4 Discussions between the clients and nearby site operators in regard to off-site parking have also been included within this report. The LBH concerns covered the use of leased land, which currently forms part of the site. Alternative parking arrangements are therefore shown to be available on the opposite side of the site.
- 5.5 Furthermore, comments on the provision of clear and defined sustainable travel measures within the Travel Plan have been included within the revised version of this document. These measures, including commitments to supporting staff with working from home and to provide a commuter mini-bus service, are discussed above.
- 5.6 Minor alterations to the site parking areas are also presented within the architect's revised layout. These changes bring the proposals in line with LBH and TfL comments on long-term and short-term cycle parking, as well as motorcycle, disabled, and EV parking spaces.

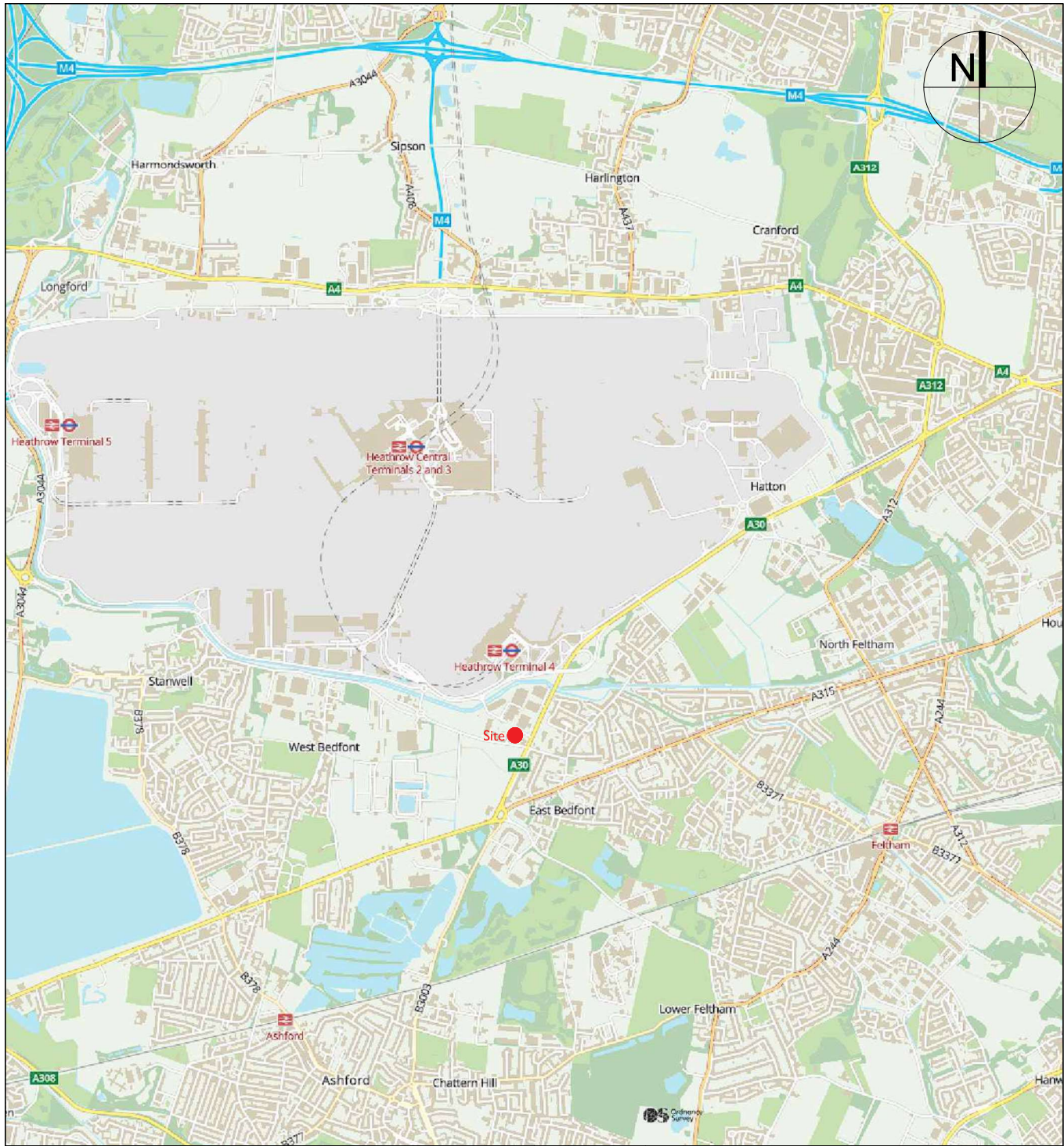
Conclusion


- 5.7 The proposed development is compliant with national and local policies, and supports national planning policy to focus residential development where this is needed and desired.
- 5.8 The scheme has been through Pre-application Advice discussions with Planning and Highways officers whose advice has been incorporated within the scheme.
- 5.9 The scheme will generate negligible effects on the local highway network, and will support existing local networks and services through increase custom and a higher local working population density.
- 5.10 There is therefore no highways or transportation reason why the proposed development should not be granted planning consent.

Appendices

Appendix: A - Location Plan
Appendix: B - Revised Masterplan
Appendix: C - Off-site Parking Discussions
Appendix: D - Swept Path Analysis

Appendix: A - Location Plan



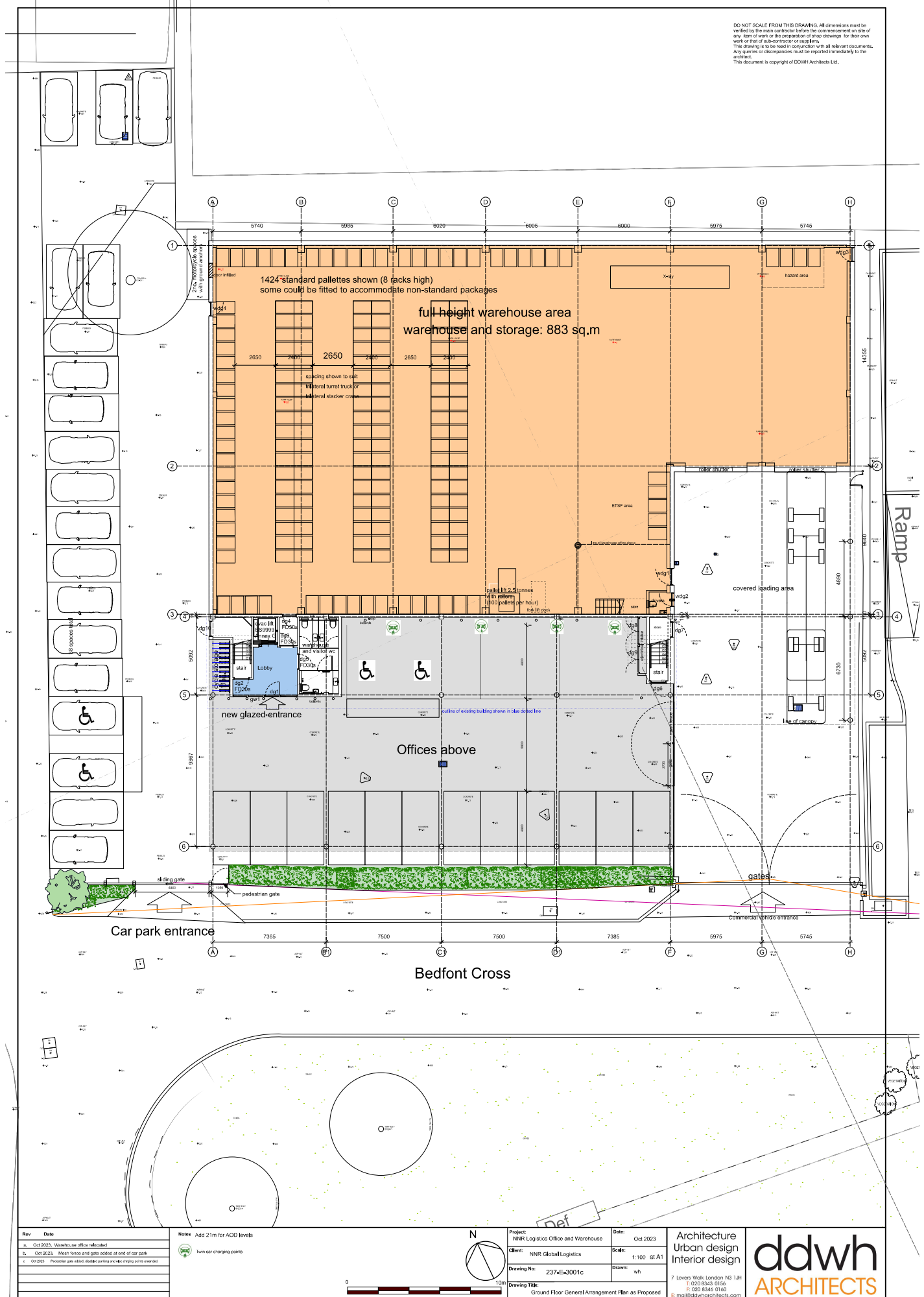
DRAWING STATUS:		REV		DATE	BY	DESCRIPTION		CKD	APP
FOR INFORMATION		PROJECT:							
Ordnance Survey (c) Crown Copyright 2018. All rights reserved. Licence number 100022432		NNH HOUSE,BEDFONT CROSS, STANWELL ROAD, FELTHAM							
<div></div> <div>1st Floor Millers House, Roydon Road, Stanstead Abbots, SG12 8HN Tel: 01920 871777 www.eastp.co.uk</div>		TITLE: LOCATION MAP							
CLIENT:		SCALE @ A3:		DESIGN-DRAWN:		DATE:			
NNR GLOBAL UK LTD		NTS		JM		31/07/2023			
ARCHITECT:		PROJECT No:		DRAWING No:					
DDWH ARCHITECTS		4633		SK01					

Appendix: B - Revised Masterplan

DO NOT SCALE FROM THIS DRAWING. All dimensions must be verified by the main contractor before the commencement on site of any item of work or the preparation of shop drawings for their own work or that of sub-contractor or suppliers.

This drawing is to be read in conjunction with all relevant documents. Any queries or discrepancies must be reported immediately to the architect.

This document is copyright of DOWH Architects Ltd.



Rev	Date
a.	Oct 2023, Warehouse office relocated
b.	Oct 2023, Mesh fence and gate added at end of car park
c.	Oct 2023, Pedestrian gate added, disabled parking and six charging points awarded

 Twin car charging points



Project: NNR Logistics Office and Warehouse	Date: Oct 2023
Client: NNR Global Logistics	Scale: 1:100 at A
Drawing No: 237-E-3001c	Drawn: wh
Drawing Title: Ground Floor General Arrangement Plan as Proposed	

Architecture
Urban design
Interior design

7 Lovers Walk London N3 1JH
T: 020 8343 0156
F: 020 8346 0160
E: mail@eddwharchitects.com

ddwh
ARCHITECTS

Appendix: C - Off-site Parking Discussions



LEE WOODWARD | HEAD OF ADMINISTRATION | NNR GLOBAL LOGISTICS UK LIMITED
Location: NNR House, Stanwell Road, Feltham, Middx, TW14 8NG
Mobile: +44 7855 845699 | Email: lee.woodward@nnruk.com | Click: www.nnrglobal.com
Please consider the environment before printing e-mail
For LinkedIn news from NNR, point camera at the QR code.

Hi Lee,

Sorry for the delay as the meeting was so near Christmas they didn't have many members present.

In principle we are very happy to host your cars when works begin as any extra income is always very welcome.

However, accepting the car park hire will very much depend on the circumstances at the time of need.

i look forward to hearing from you in the future.

Kind regards

Gary

Gary Denne
Administration Manager
Ashford (Short Lane) Sports Ltd
01784 252288

Joseph Mercieca

From: Clare Daley <c.daley@hc-gb.com>
Sent: 09 December 2023 09:54
To: Lee Woodward
Cc: Mital Patel
Subject: Re: Car Parking Rental - NNR Global Logistics

Morning Lee,

We do have up to 20 spaces available and it would be a monthly rolling contract.

Kind regards,

Sent from [Outlook for iOS](#)

Clare Daley
Head of Lettings



Lettings: 0333 242 2806

c.daley@hc-gb.com

hc-gb.com

19 London House High Street, Stony Stratford, Milton Keynes, MK11 1SY, United Kingdom

🌱 Consider the environment. Do you really need to print this email?



Disclaimer: This E-mail and the information contained in it and in any attachments are subject to copyright, confidential and may also be privileged. It is intended only for the addressee(s) named above. If you have received this E-mail in error, please notify the sender immediately and delete the original message. You are not authorised to disclose, use, copy, alter, or distribute this e-mail or any part of it. We have taken precautions to minimise the risk of sending software viruses but we advise you to carry out your own virus checks. We cannot accept liability for any loss or damage caused by software viruses. To the extent that there are opinions or views expressed in this E-mail, they are those of the individual sender and may not, necessarily, reflect the views of HCGB Services Limited.

HCGB Services Limited is a company registered in England and Wales under number 13089284
Registered office: 19 London House High Street, Stony Stratford, Milton Keynes, England, MK11 1SY

From: Lee Woodward <lee.woodward@nnruk.com>
Sent: Saturday, December 9, 2023 9:46:36 AM
To: Clare Daley <c.daley@hc-gb.com>
Cc: Mital Patel <m.patel@lrc-uk.com>
Subject: Re: Car Parking Rental - NNR Global Logistics

Hi Clare

Thanks for coming back.

Are you able to advise how many parking spaces you would have available for us to rent? We could require 10-20 spaces so would that be possible?

I assume this would be on a monthly rolling contract?

Kind regards
Lee

Sent from [Outlook for Android](#)

From: Clare Daley <c.daley@hc-gb.com>
Sent: Saturday, December 9, 2023 9:39:16 am
To: Lee Woodward <lee.woodward@nnruk.com>
Cc: Mital Patel <m.patel@lrc-uk.com>
Subject: Re: Car Parking Rental - NNR Global Logistics

Good morning Lee,

Apologies for not getting back to you sooner.

We do have available parking at a monthly charge of £75 pcm.
If you wish to proceed, we will require the car model and registration.

Kind regards,

Sent from [Outlook for iOS](#)
Clare Daley
Head of Lettings



Lettings: 0333 242 2806

c.daley@hc-gb.com

hc-gb.com

19 London House High Street, Stony Stratford, Milton Keynes, MK11 1SY, United Kingdom

🌱 Consider the environment. Do you really need to print this email?



Disclaimer: This E-mail and the information contained in it and in any attachments are subject to copyright, confidential and may also be privileged. It is intended only for the addressee(s) named above. If you have received this E-mail in error, please notify the sender immediately and delete the original message. You are not authorised to disclose, use, copy, alter, or distribute this e-mail or any part of it. We have taken precautions to minimise the risk of sending software viruses but we advise you to carry out your own virus checks. We cannot accept liability for any loss or damage caused by software viruses. To the extent that there are opinions or views expressed in this E-mail, they are those of the individual sender and may not, necessarily, reflect the views of HCGB Services Limited.

HCGB Services Limited is a company registered in England and Wales under number 13089284
Registered office: 19 London House High Street, Stony Stratford, Milton Keynes, England, MK11 1SY

From: Lee Woodward <lee.woodward@nnruk.com>
Sent: Thursday, November 30, 2023 12:24:08 PM
To: Clare Daley <c.daley@hc-gb.com>
Cc: Mital Patel <m.patel@lrc-uk.com>
Subject: RE: Car Parking Rental - NNR Global Logistics

Hi Clare

Are you able to update on this asap?

Kind regards





LEE WOODWARD | HEAD OF ADMINISTRATION | NNR GLOBAL LOGISTICS UK LIMITED
Location: NNR House, Stanwell Road, Feltham, Middx, TW14 8NG
Mobile: +44 7855 845699 | Email: lee.woodward@nnruk.com | Click: www.nnrglobal.com
Please consider the environment before printing e-mail
For LinkedIn news from NNR, point camera at the QR code.

From: Lee Woodward
Sent: 21 November 2023 11:38
To: Clare Daley <c.daley@hc-gb.com>
Subject: RE: Car Parking Rental - NNR Global Logistics

Thanks Clare, I look forward to hearing back from you.

Kind regards



LEE WOODWARD | HEAD OF ADMINISTRATION | NNR GLOBAL LOGISTICS UK LIMITED
Location: NNR House, Stanwell Road, Feltham, Middx, TW14 8NG
Mobile: +44 7855 845699 | Email: lee.woodward@nnruk.com | Click: www.nnrglobal.com
Please consider the environment before printing e-mail
For LinkedIn news from NNR, point camera at the QR code.

From: Clare Daley <c.daley@hc-gb.com>
Sent: 21 November 2023 11:26
To: Lee Woodward <lee.woodward@nnruk.com>
Subject: RE: Car Parking Rental - NNR Global Logistics

Good morning Lee,

Thank you for your email.

Let me see how many parking spaces we have available and cost.

I will back in touch.

Kind regards,

Clare Daley
Head of Lettings



Lettings: 0333 242 2806
 c.daley@hc-gb.com
 hc-gb.com
 19 London House High Street, Stony Stratford, Milton Keynes, MK11 1SY, United Kingdom

Consider the environment. Do you really need to print this email?



Disclaimer: This E-mail and the information contained in it and in any attachments are subject to copyright, confidential and may also be privileged. It is intended only for the addressee(s) named above. If you have received this E-mail in error, please notify the sender immediately and delete the original message. You are not authorised to disclose, use, copy, alter, or distribute this e-mail or any part of it. We have taken precautions to minimise the risk of sending software viruses but we advise you to carry out your own virus checks. We cannot accept liability for any loss or damage caused by software viruses. To the extent that there are opinions or views expressed in this E-mail, they are those of the individual sender and may not, necessarily, reflect the views of HCGB Services Limited.

HCGB Services Limited is a company registered in England and Wales under number 13089284
Registered office: 19 London House High Street, Stony Stratford, Milton Keynes, England, MK11 1SY

From: Lee Woodward <lee.woodward@nnruk.com>
Sent: Friday, November 17, 2023 10:34 AM
To: Clare Daley <c.daley@hc-gb.com>
Subject: Car Parking Rental - NNR Global Logistics

Good morning Clare

My colleague Carol reached out to you back in July 2022 with regards to the potential to lease some parking spaces from the car park located at Bedfont Cross, directly adjacent to our building: **NNR House, Stanwell Road, Feltham, Middx, TW14 8NG**

Are you able to advise whether leasing of parking at this site is still possible? And if so, what the costs would be? We are potentially looking for an additional 20 parking spaces for staff attending our office. These spaces would need to be designated for NNR staff only so they are always available when we need them.

If you require any further information then please let me know.

Kind regards



LEE WOODWARD | HEAD OF ADMINISTRATION | NNR GLOBAL LOGISTICS UK LIMITED
Location: NNR House, Stanwell Road, Feltham, Middx, TW14 8NG
Mobile: +44 7855 845699 | Email: lee.woodward@nnruk.com | Click: www.nnrglobal.com
Please consider the environment before printing e-mail
For LinkedIn news from NNR, point camera at the QR code.

From: Carol Whiting
Sent: 22 July 2022 15:02
To: Clare Daley <c.daley@hc-gb.com>
Subject: FW: Car Park

Good Afternoon Clare,

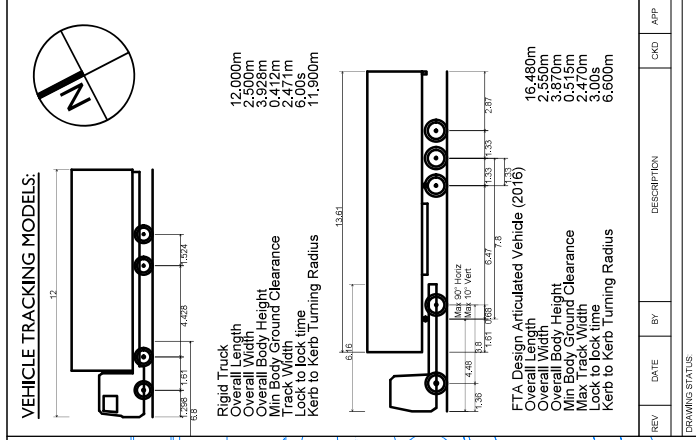
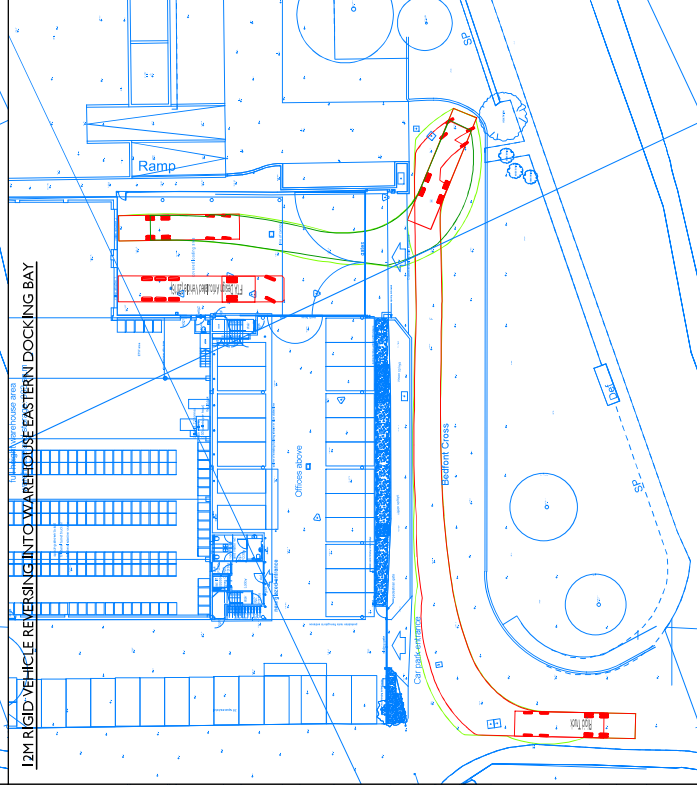
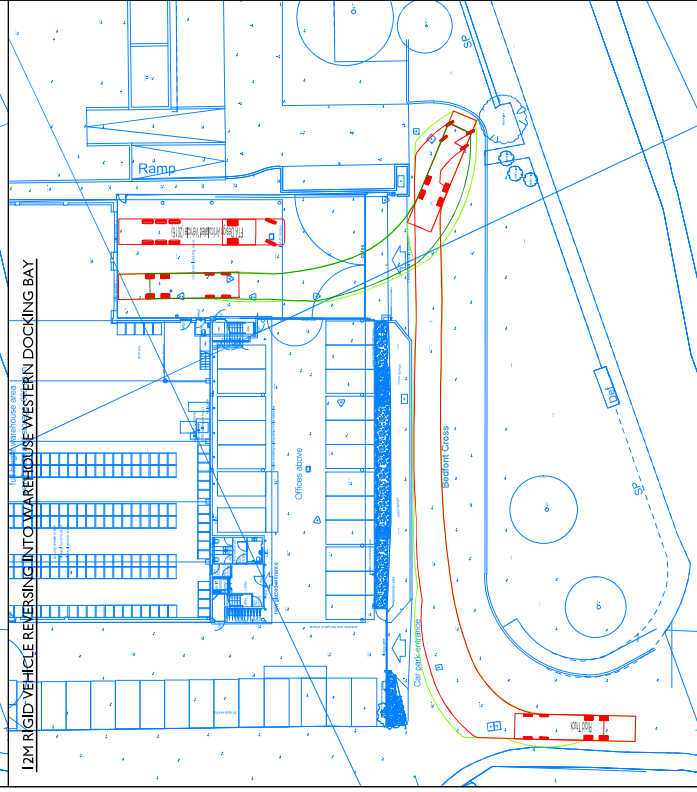
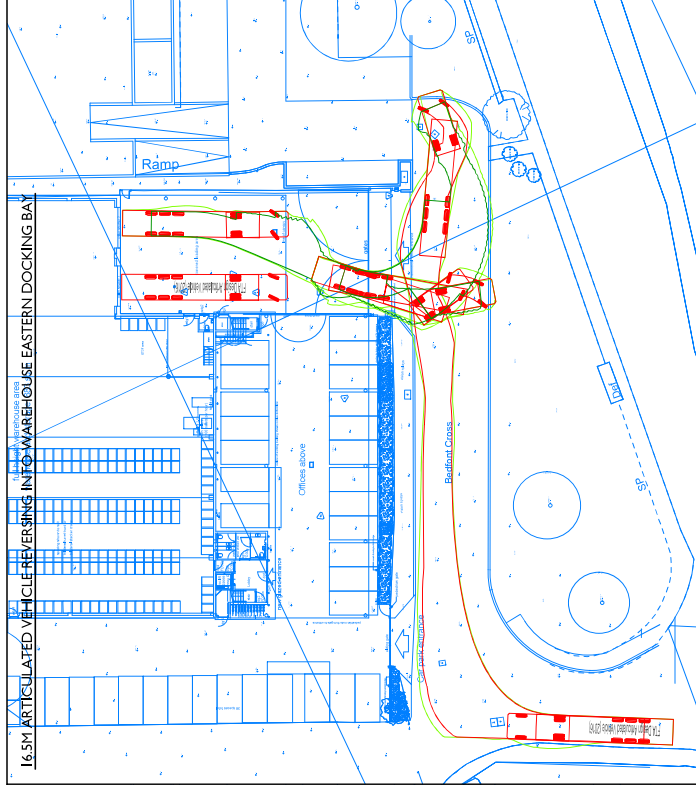
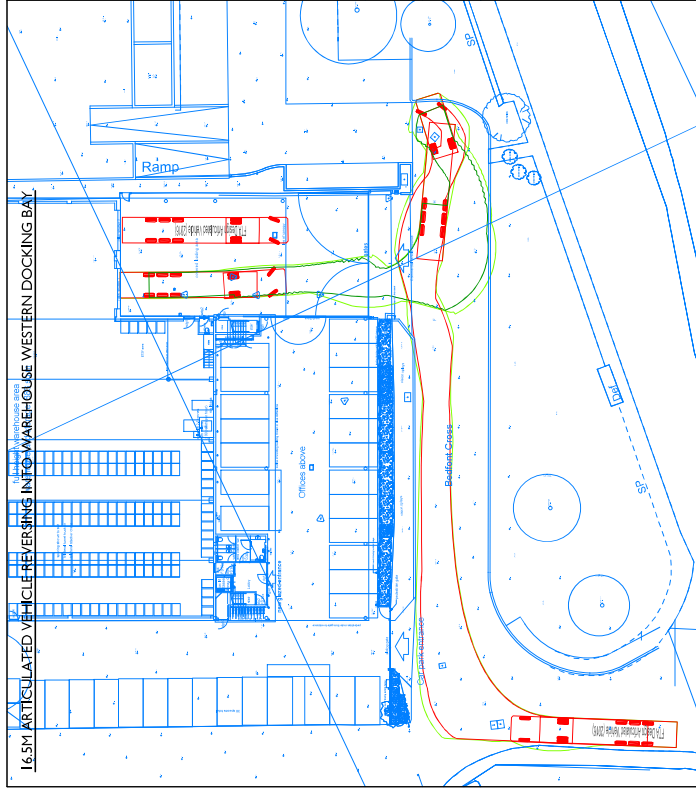
I hope your OK, I am getting back to you re the parking spaces next door, we are looking to lease at least 10 spaces from you, with the view of maybe 2 electric charging ones included in these. I see the top floor up the ramp is empty, my manager asked if perhaps you are interested in leasing us some spaces up there?


I look forward to hearing from you

Kind Regards

Kind Regards

Appendix: D - Swept Path Analysis



FOR INFORMATION			
Ordinance Survey (c) Crown Copyright, 2018. All rights reserved. Licence number 100022432			
<div></div>			
1 st Floor Millers House, Raydon Road, Stanstead Abbots, SG12 8HN Tel: 01920 871777 www.eastp.co.uk			
CLIENT:	NNR GLOBAL UK LTD		
ARCHITECT:	DDWH ARCHITECTS		
PROJECT:	NNH HOUSE,BEDFONT CROSS, STANWELL ROAD, FELTHAM		
TITLE:	SWEPT PATH ANALYSIS OF A 16.5M ARTICULATED VEHICLE & 12M RIGID VEHICLE TURNING WITHIN THE SERVICING AREA		
SCALE @ A3	1 : 500	DESIGN/DRAWN: JM	DATE 28/07/2023
PROJECT No.	4633	DRAWING No.	
		SK02 REV D	