



Borough Reference: 75111/APP/2025/739
TfL Spatial Planning Reference: TfL/2025/0244

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Transport for London
City Planning

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To Michael,

RE: TfL's detailed comments on Union Park, Bulls Bridge Industrial Estate

Thank you for consulting TfL Spatial Planning on this referable application. From the information submitted it is understood that the proposed development is for:

'Redevelopment of site to deliver extension to existing Union Park data centre campus consisting of (a) free standing data centre building (b) energy, power, and water infrastructure (c) site access and internal roads (d) site security arrangements (e) hard and soft, green landscaping and (f) other ancillary and auxiliary forms of development.'

I write to provide detailed transport comments on the above application. These provide more detail on the matters raised in the GLA Stage 1 Planning Report reference GLA/2025/0359/S1 dated 9th June 2025. Please note that these are additional also to any response you may have received from my colleagues in infrastructure or asset protection and from TfL as a property interest.

Site Description

Access to the Parkway A312, which forms part of the TLRN network, is from Bulls Bridge Roundabout, via North Hyde Gardens/Road, less than 750m to the south.

This site is served by 2 bus routes (195 and E6) with the nearest bus stop on North Hyde Road, approximately 620m from the site. Hayes & Harlington rail station, which provides access to Elizabeth Line services, can be accessed within 1.4km. Consequently, the site has a PTAL of 3 on a scale of 0 to 6b, where 6b is highest.

The Grand Union Canal, directly south of the site, is part of the 'Blue Ribbon' route and accommodates pedestrians and cyclists.

Healthy Streets

Whilst the submitted Transport Assessment includes reference to an ATZ assessment, only maps have been provided. No photography or commentary on the routes to key trip attractors have been provided. An updated ATZ assessment should be provided for review. Noting the 24/7 operation of the proposed development, the updated ATZ assessment should also include a night-time assessment of routes to key trip attractors. This assessment should inform further discussions with the relevant authority about appropriate mitigation that is to be secured from this site.

Given the projected scale of growth in Hayes, particularly those using North Hyde Gardens, and the consequent deterioration in conditions for all road users, particularly for pedestrians, cyclists, and bus passengers, TfL has developed a package of measures for the A312. As users of this development would benefit from these new facilities and the development would generate impacts which should be mitigated, a contribution should be secured. A contribution of £31,643 should be secured within the S106 agreement.

As noted above, the site is in close proximity to the Grand Union canal. Officers will be supportive of a contribution towards improving the Grand Union canal being secured.

Impact Assessment

A multi-modal trip generation assessment has been provided for the peak hours. Noting the 24/7 operation of the site, a 24-hour trip profile should be provided.

The modal split identifies that 49% of trips to and from this site will be made by private vehicles. This is not in accordance with the Mayor's strategic mode shift target detailed in Policy T1. The design of the site and measures implemented through the travel plan should be seeking to facilitate sustainable and active travel to this site. Further thought on this matter is required.

As noted in the Healthy Streets section above, a contribution towards the A312 Healthy Streets scheme should be secured from this development.

Access and Parking

A link road connecting to North Hyde Gardens Bridge is to be created. This will provide access to the site for all modes. The proposal internal access arrangements are supported by swept path analyses for the largest vehicles that will access the site. It is considered that further thought should be given to the desire line of pedestrians, and it must be ensured that sufficient pedestrian width is being provided.

A total of 14 car parking spaces is proposed for this development, of which two are disabled person parking spaces. It has also been indicated that additional

spaces for motorcycles, mopeds and scooters will be provided, but not clarity has been provided in terms of the number of spaces. The London Plan is clear that where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all uses. Further comments on this matter will follow once this clarification has been provided.

A total of eight cycle parking spaces is proposed. This quantum is not in line with London Plan standards which requires a total of 31 long-stay and 16 short-stay to be provided. To support facilitating a strategic modal shift, high quality cycle parking at this site should be provided. Cycle parking should be designed in line with London Cycle Design Standards (LCDS), referred to in Policy T5. Based on the plans provided, TfL has the following concerns:

- All cycle parking provision appears to be located within the public realm. As identified within LCDS, the preference is for long-stay cycle parking provision to be provided within the building. Has this option been explored by the applicant?
- At least five per cent of cycle parking provision should be suitable to accommodate larger and adapted cycles. It does not appear that such provision is currently available at this site, and this must be addressed. To accommodate larger and adapted cycles, at least 1.8m spacing between Sheffield stands should be provided.
- For Sheffield stands to accommodate standard cycles, a minimum of 1.0m (1.2m preferred) should be provided.
- End of journey facilities, such as lockers and showers, should be provided. These should be secured through the appropriate mechanism.

A Parking Design and Management Plan (PDMP) detailing the arrangements for all parking (car and cycle) on-site, including provisions for managing, monitoring, enforcement and review, should be secured by legal agreement.

Delivery and Servicing and Construction Logistics Plan

Delivery and Servicing is to take place on-site, which is in line with Policy T7. It has been identified that a booking system will be implemented, and that deliveries turning up within out a booked slot will be turned away. For vehicles that are turned away, they will be required to turn around, with swept path showing that this would include a reversing manoeuvre, at the end of North Hyde Gardens. In line with the Mayor's Vision Zero approach, the proposed development should be designed to avoid the requirement for reversing. Further thought on this matter is required.

A full Delivery and Servicing Plan (DSP) should be secured through the appropriate mechanism. This should detail the measures that will be implemented to reduce the impact on this activity on the surrounding transport network and encourage sustainable and active freight at the site.

Noting that this site forms part of a wider campus, consideration should be given to the measures that could be implemented across the campus to reduce the cumulative impact of this activity on the transport network.

A Construction logistics Plan (CLP) should be secured through the appropriate mechanism. This should be prepared in line with TfL guidance, and take into account any existing operations, and associated movement of different modes, at the adjoining site.

Travel Plan

A framework Travel Plan has been submitted to support the application. The targets seeks to increase the level of Active Travel at this site by from 44% to 48% over a five year period. It is considered that the Travel Plan could be more ambitious through setting higher targets. The applicant should identify additional measures that will be implemented to support facilitating a strategic modal shift at this site, in line with Policy T1.

A full Travel Plan should be secured within the S106 agreement for this site.

Conclusion

To conclude:

- An increase in the quantum of cycle parking at this site is required to ensure the proposal is in line with London Plan standards;
- A contribution towards the A312 Healthy Streets scheme should be secured;
- Further thought on the Travel Plan, and the targets contained within the Travel Plan, is required;
- A Parking Design and Management Plan (PDMP), Construction Logistics Plan (CLP), Delivery and Servicing Plan (DSP) should be secured through the appropriate mechanism.

Please do not hesitate to contact me if you would like to discuss the above comments further.

Many thanks,

Amy Tempest
Principal Area Planner – West Team