



Our ref: 16/3867
Your ref: 16/0119/FULOPDC

Transport for London
Group Planning

Windsor House
42 – 50 Victoria Street
London SW1H 0TL

Michael Drake
Sent via email only

Phone 020 7222 5600
Fax 020 7126 4275
www.TfL.gov.uk

21 October 2016

Dear Michael,

**115-129A SCRUBS LANE, NORTH KENSINGTON GATE, SOUTH SITE,
HAMMERSMITH AND FULHAM REF: 16/0119/FULOPDC**

I write following notification of the above planning application on 27 September 2016.

Please note that these comments represent the views of Transport for London officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority.

Site Location and Context

The development site is located on Scrubs Lane (A219), to the north of Mitre Bridge and the Grand Union Canal and to the southwest of Scrubs Lane/ Hythe Road junction. The site is located in London Borough of Hammersmith and Fulham (LBHF) but being located within the Old Oak and Park Royal Opportunity Area (OA) falls within the planning jurisdiction of the OPDC. Harrow Road (A404) is approximately 550m north of the site. The nearest part of the TLRN is A40 Westway, which is approximately 1.4km to the south of the site.

Access by bus is afforded by bus route (220), which connects the site to Willesden Junction station, White City and other destinations further afield. This is a high-frequency bus route, offering 12 buses per hour during weekdays, 9 and 7 buses per hour on Saturday and Sunday respectively. The route provides a night service offering 4 buses per hour on weeknights and 2-3 buses per hour on Saturday and Sundays. The distance between the site and the nearest rail station exceeds the maximum distance used in PTAL calculations (960m from a station).

As a result, the site records a Public Transport Access Level of 1b, on a scale from 1 to 6b (6b being the best). However, there are extensive planned transport improvements for the Opportunity Area, which will enhance the site's access to public transport e.g. the proposed Hythe Road station will be located approximately 250m to the west of the site, giving access to the London Overground network. Old Oak

Common HS2 and Crossrail stations will be located 500m to the south-west of the site. The site is expected to achieve a PTAL of 5-6a as a result of planned future rail improvements and other transport infrastructure in the Old Oak and Park Royal OA.

Access

Pedestrian and cycle access for both the residential and commercial uses will be afforded from Scrubs Lane. Vehicle access will be afforded from the southernmost vehicle access on Scrubs Lane, which provides access to a single-width vehicle ramp to the basement car park. The ramp will be controlled by traffic lights, giving priority to vehicles entering the car park, in order to minimise waiting on the public highway. Moreover, sufficient space is allowed between the ramp access and the public highway to ensure that a vehicle accessing the car park is clear of the public highway on occasions when another vehicle is leaving the car park.

Delivery and servicing vehicles will be accommodated in a new loading bay to be installed at the front of the development in Scrubs Lane. The loading bay will be accommodated fully within the width of the footway but a wider footway in Scrubs Lane is provided by setting back building on the Scrubs Lane frontage, which ensures that sufficient unobstructed footway is available to pedestrians at all times. Whilst on-footway loading is not the most desirable solution for delivery and servicing TfL appreciates that this is the only viable delivery and servicing option for this development. It is understood that the applicant will offer the strip of land between the existing back of footway and proposed building line to the Council for adoptions as public highway. TfL supports this.

TfL expects that the highway works necessitated by the proposal will be undertaken by the highway authority (LBHF) at cost to the applicant. These works will include, but not limited to, the construction of the loading bay, renewal of the footway adjoining the site in Scrubs Lane, removal of existing street furniture, construction/ modification of vehicle access and amendments to the existing traffic management orders. It is expected that the applicant will be obligated to pay for the highway works through a s.278 agreement with LBHF.

Car Parking

The development includes 32 car parking spaces including 9 accessible spaces. The car parking level equates to 0.18 per residential unit and accords with the maximum permissible car parking (0.2 spaces per residential unit) for developments in the Old Oak and Park Royal OA. The level of car parking is compliant with the London Plan. The level of accessible parking is about 5%, which is lower than TfL's requirement of 10%. The applicant explains that due to height and commercial constraints it is not possible to provide accessible parking at the 10% level. However, 4 of the general use car parking spaces can be converted to accessible spaces in the future if needed. So the basement car park can potentially accommodate up to 13 accessible spaces.

TfL expects that future occupiers will be prevented from applying for permits to park in the existing controlled parking zone (CPZ).

The accompanying transport assessment notes the desire of the draft Local Plan/OAPF to provide a network of car clubs throughout the OA. In support of this objective TfL recommends that each household is provided with three years free membership of a car club and additionally funding towards the start up of a car club should be secured as part of the permission.

The proposal includes Electric Vehicle Charing Points (EVCPs) in the basement car park at the level of 20% (6 spaces). The remaining 80% of spaces will have passive provision, ensuring that EVCPs can be installed in all spaces in response to future demand.

Trip Generation and Impacts

The trip generation analysis shows that the development will generate fewer car trips than the existing use due to it being a low car development. TfL accepts the conclusion of the TA that no material traffic impacts will arise from the development. 23 daily delivery and servicing movements are anticipated. These movements are distributed throughout the day and therefore will not result in any material effects on the local and strategic road network.

The bus impact assessment shows that the development will generate a net 23 and 14 two-way bus trips during the AM and PM peaks respectively for the year of opening (2019). Bus trips will reduce in the 'Future' Year (2031) as a result of a shift to rail following the introduction of services through Hythe Road and Old Oak Common stations. Using BODS data the TA demonstrated that the increased bus patronage will have no material impact on the capacity of bus route 220.

However, it would be appropriate to seek financial contributions towards bus improvements in the context of growth in demand in the OA. The contribution towards bus improvements could be based on a simple calculation of the proportion of the capacity of a double-decker bus generated by the development. The AM represents the worst case scenario for this development. The development generates 23 two-way bus trips during the AM peak, which equates to 0.33 of the capacity (70) of a double-decker bus. Applying this proportion to the cost of an additional bus over a 5-year period equates to £156,750 (0.33(95,000x5)). TfL considers this contribution to be reasonable and proportionate to bus impacts created by the development.

The development is expected to generate an additional 31 and 16 two-way trips by rail during the AM and PM peak periods respectively, during the opening year (2019); and 51 and 30 two-way rail trips during the AM and PM peaks respectively, during the future year (2031). Given the significant increase in rail capacity resulting from future rail and overground services in Old Oak Park the impact on rail services is considered to immaterial.

Walking and Cycling

The proposal includes secure cycle parking at ground floor level. A total of 385 cycle spaces are provided for residential use (280 long-stay and 5 short-stay spaces). Cycle parking for the commercial use consists of 4 long-stay spaces and 15 short-stay spaces on the frontage of the development. The proposed cycle parking accords with the recommended standards in the London (FALP, 2015) but TfL supports the OPDC's requirement for higher cycle parking standards in the Old Oak and Park Royal area. Details of cycle parking will need to be secured by condition.

Construction Logistics Plan (CLP)

The draft CLP is considered to be generally acceptable. TfL expects that a full CLP will be secured by condition and approved by the Council prior to commencement of construction on site. Depending on the timing of construction the CLP will be expected to follow the Construction Logistics strategy for the wider OPDC area.

Additionally, applicants and their contractors are encouraged to sign up to the Fleet Recognition Scheme (FORS) which promotes better safety standards during

construction. The FORS guidance can be found at <http://www.tfl.gov.uk/info-for/freight/safety-and-the-environment/managing-risks-wrrr>.

Delivery and Servicing

The application includes a Delivery and Servicing. The content of the document including the provisions for managing and monitoring and review is considered to be generally acceptable. As the occupiers of the commercial units are presently unknown the full DSP will need to be updated and resubmitted for approval by the Council prior to occupation of the development.

Travel Plan

TfL welcomes the submission of a Travel Plan, which is generally acceptable. The full Travel Plans will need to be submitted to the OPDC for approval prior to the occupation of the development and should include provisions for reviewing and monitoring. The Travel Plan should be secured by legal agreement.

Section 106 and CIL

In accordance with London Plan policy 8.3, *Community Infrastructure Levy*, the Mayor commenced CIL charging for developments on 1st April 2012. It is noted that the proposed development is within the London Borough of Hammersmith & Fulham, where the Mayoral charge is £50 per square metre Gross Internal Area (GIA). Further details can be found at: <http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>.

Summary

In summary, TfL is satisfied that the proposal will not result in any material impacts on the nearby strategic road and local public transport services. The proposal is considered to be compliant with the London Plan, subject to the planning conditions and obligations above.

Please do not hesitate to contact Fred Raphael (020 3054 7141); FredRaphael@tfl.gov.uk) if you have any questions arising from the contents of this letter.

Yours sincerely,

Fred Raphael
Principal Technical Planner
Email: FredRaphael@tfl.gov.uk
Direct line: 020 3054 7141