1 INTRODUCTION

1.1 NOTE PURPOSE

1.1.1 This Transport Note (TN) has been prepared to respond to transport-related comments within the Greater London Authority (GLA) Stage 1 Report for the proposed redevelopment of Phoenix Academy situated on The Curve, London, W12 0RQ, within the London Borough of Hammersmith and Fulham (LBHF).

1.1 BACKGROUND INFORMATION

1.1.1 A planning application (2025/02541/FUL) was submitted on the 18th September 2025 to provide 307 residential dwellings and the part refurbishment and part new build of Phoenix Academy secondary school, including six-form entry (FE) to accommodate a maximum of 900 pupils and 80 staff.

1.1.2 LBHF provided a committee report ahead of a Planning Committee with a recommendation for refusal. The following transport-related reason was provided as a reason for refusal:

"Parking - The proposed level of car parking exceeds the requirements of London Plan Policy T6, which seeks to reduce car dependency and prioritise sustainable travel. This also conflicts with Local Plan Policies T1 and T3 and would undermine local air quality and transport objectives."

1.1.3 A Planning Committee Deferral Request was submitted following the committee report to allow the Applicant team to respond to the reasons for refusal; however, this was rejected and the application was subsequently rejected at the Planning Committee on the 14th April 2026.

1.2 CONSULTEE COMMENTS

1.2.1 Following the submission of the application on the 18th September 2025, the following transport-related consultee responses have been received:

- LBHF transport comments within the committee report provided on the 7th April 2026.
- GLA Stage 1 Planning Comment Report (GLA reference: GLA/2026/0023/S1). The GLA report includes some transport comments which were expanded upon within the Transport for London (TfL) response noted below. No date was provided on the GLA Stage 1 Planning Comment Report.
- TfL Detailed Comments were provided on the 31st March 2026 (TfL reference: TFL/2026/0150). The TfL response builds on the responses provided within the GLA Stage 1 Report.

1.2.2 This TN provides a response to the TfL/GLA consultee comments raised to demonstrate to the GLA that the Proposed Development complies with the London Plan policies.

2 RESPONSE TO TFL COMMENTS

2.1 INTRODUCTION

2.1.1 This section provides responses to address the comments raised by TfL. The comments are outlined in the following section in *blue italic* text with the response underneath.

2.2 HEALTHY STREETS

An Active Travel Zone (ATZ) daytime and night-time assessment in line with TfL guidance has been submitted. On several of the routes, it was highlighted that the pedestrian and cyclist crossing facilities were not adequate and therefore, TfL would encourage the improvements to go towards this to ensure safe travel to and from the site for residents, staff and most importantly, the school students.

2.2.1 The Applicant supports the principle of safe, accessible walking and cycling routes for residents, staff and pupils, and is committed to delivering the Healthy Streets Approach within the site itself. The improvements identified within the ATZ assessment comprise area-wide changes that offer wider public improvements but are not necessary to make the development acceptable, particularly given the limited uplift in pedestrian and cycle movements generated relative to the existing school baseline. The Proposed Development would generate a substantial Borough CIL receipt payable to LBHF which can be used to fund pooled area-wide transport network improvements. The Applicant therefore supports the use of CIL receipts to deliver the ATZ improvements identified.

2.3 CAR PARKING

RESIDENTIAL CAR PARKING

The residential development is proposed to be car-free. This is in line with London Plan Policy T6 and is welcomed, subject to permit-free agreements and appropriate contribution towards parking controls being secured. Ten blue-badge spaces are proposed, which equates to three per cent of units and is in line with London Plan.

We welcome the provision of active electric charging points for 20 per cent of the spaces, it should be ensured that the remaining spaces have passive provision. A Car Parking Management Plan should be secured by condition.

2.3.1 It is agreed that a Car Parking Management Plan can be secured as a Planning Condition.

SCHOOL CAR PARKING

38 car parking spaces are proposed as staff parking for the school. Four of these will be provided as blue-badge spaces. The starting point for all development that is or plans to be well connected by public transport should be car-free in line with Policy T6. Therefore, any car provision must be justified and evidenced as part of the application. It must be demonstrated that any parking provision is the minimum necessary for the operation of the site.

2.3.2 The existing school provides 68 car parking spaces. The number of parking spaces has been confirmed from an on-site parking survey in 2024. Some of these spaces are located beneath the building and are not visible from aerial imagery.

2.3.3 There is no fixed parking standard for school land use in the London Plan and school car parking is instead assessed on a case-by-case basis.

2.3.4 Staff parking is a key requirement to retain and attract teachers to the school and is therefore necessary to support and enable the school to function and be successful. Future Academies deemed 38 spaces as being the required level of parking to safeguard current and future teacher retention.

2.3.5 The proposed 38 spaces are justified and reflect an uplift of current usage patterns to the future school capacity. In particular:

- A review of current staff travel data (based on a 2025 staff travel survey) shows that 35% of staff regularly travel by car; applied proportionately to 80 future staff, this equates to a demand for 28 spaces.
- 4 disabled spaces are provided.
- 2 spaces are required for minibuses.
- 4 spaces are for visitors and operational use.

2.3.6 The proposal must be viewed in context. It represents a substantial reduction from the existing 68 spaces. 20% of spaces would be provided with EV charging, supporting sustainable travel. The TA demonstrates that traffic effects would be comparable to the existing situation and that the development would not give rise to severe transport impacts.

2.3.7 A School Travel Plan and Car Parking Management Plan would also be in place to monitor parking demand, reduce vehicle use, and encourage travel by sustainable modes. Detailed versions of the School Travel Plan and Car Parking Management Plan would be secured via planning conditions. The detailed versions of these documents can include a monitoring regime and a strategy to remove staff parking in favour of landscaping, should there be a reduced need for staff parking over time. It is, however, essential that the starting point is for the car parking to be provided to enable the school to operate successfully and retain and attract teachers.

2.3.8 Overall, the proposed school car parking is not a policy non-compliance and would not result in an unacceptable impact on the safety or operation of the transport network.

2.4 CYCLE PARKING

RESIDENTIAL CYCLE PARKING

564 long-stay and 12 short-stay cycle parking spaces are proposed for the residential element of this development. This is in line with London Plan Policy T5.

A detailed plan showing the route that cyclists would take from the entrance of the site to the cycle store should be submitted. It must be demonstrated that the safety and comfort of active modes are prioritised and reflect the Healthy Streets Approach.

Furthermore, residents should be able to access the cycle store through the main lobby. We support the option to provide an external access and an internal access, however both should be provided from the outset.

2.4.1 We note TfL's comment that the quantum of cycle parking aligns with the London Plan 2021 requirements and this is in excess of the updated standards in the Support for Housebuilding London Plan Guidance adopted in March 2026 and the subsequent draft London Plan 2026 guidance issued in July 2026.

2.4.2 The cycle stores currently have external access points from the site's landscaping, which are likely to be favoured as this provides the most efficient form of access for residents. Providing an additional internal access to the cycle stores was explored with the architects and technical team; however, whilst an internal access door to the cycle store could be designed to comply with the Building Regulations through appropriate fire compartmentation and fire-rated doors, an external-only access provides a more robust fire safety solution. It removes a potential route for smoke and fire spread into the protected residential circulation space, reduces reliance on fire doors and management measures, and better separates the increasing fire risk associated with the storage of bicycles and lithium-ion battery-powered e-bikes. The proposed arrangement therefore aligns with the objectives of Approved Document B, BS 9991 and the principles of the Building Safety Act by reducing fire risk through design where reasonably practicable.

2.4.3 The routes from the public highway to the cycle stores are shown in **Figure 2-1**. Details of the cycle storage and access can be reviewed at the detailed design stage. Overall, the current access strategy is considered to be convenient for residents while complying with fire regulations

Figure 2-1: Route to Residential Cycle Stores

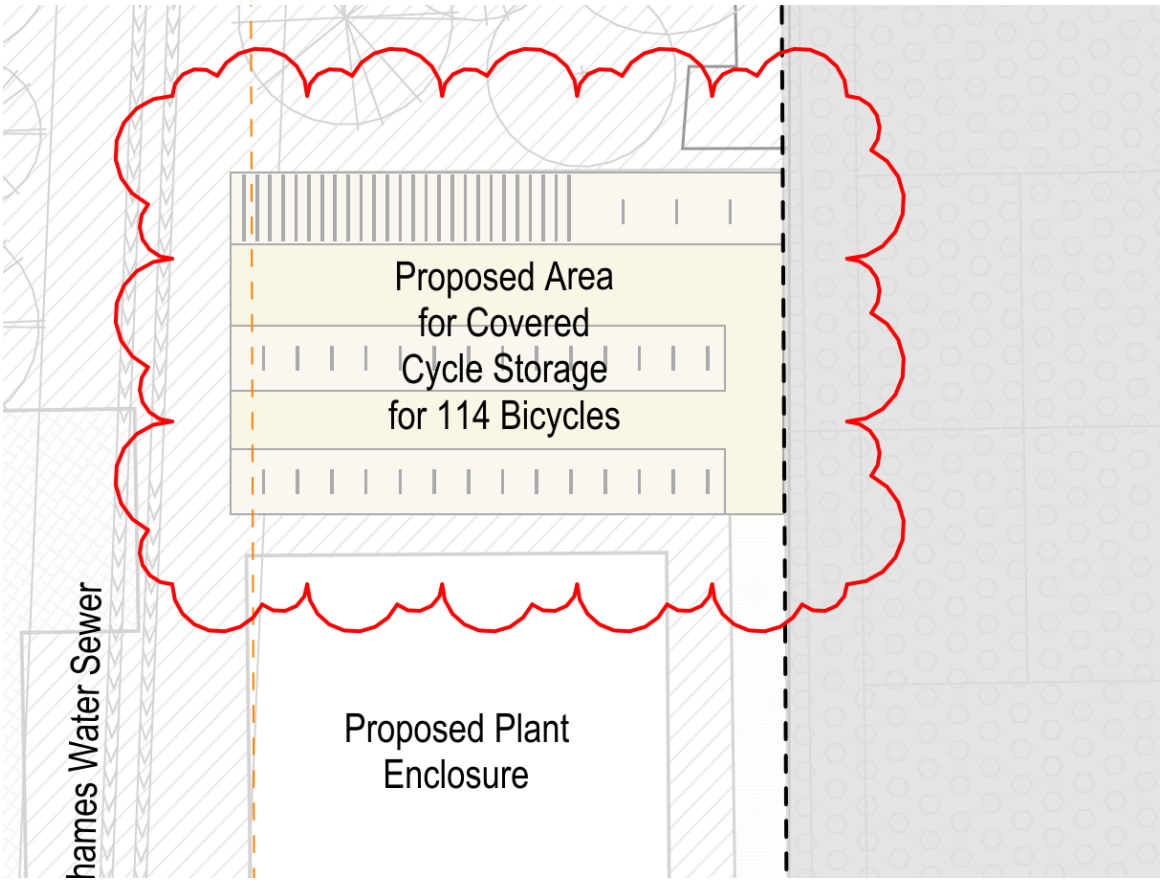
SCHOOL CYCLE PARKING

123 long-stay and nine short-stay cycle parking spaces are proposed for the school element of this development. This is in line with London Plan Policy T5. Please could the applicant confirm what type of stands will be provided alongside the wider-spacing stands already noted within the Transport Assessment. Supporting facilities (e.g. lockers and showers) should be provided on-site for the staff cycle parking provided.

2.4.4 A separate student cycle store has been provided and details of this cycle store are shown in **Figure 2-2**. This cycle store will be secure, covered and provide 114 bicycles for students in line with the London Plan 2021 requirements. A mix of cycles has also been provided, with 5% of cycles provided for accessible bikes, 50% provided on Sheffield stands and 45% provided on two-tier racks.

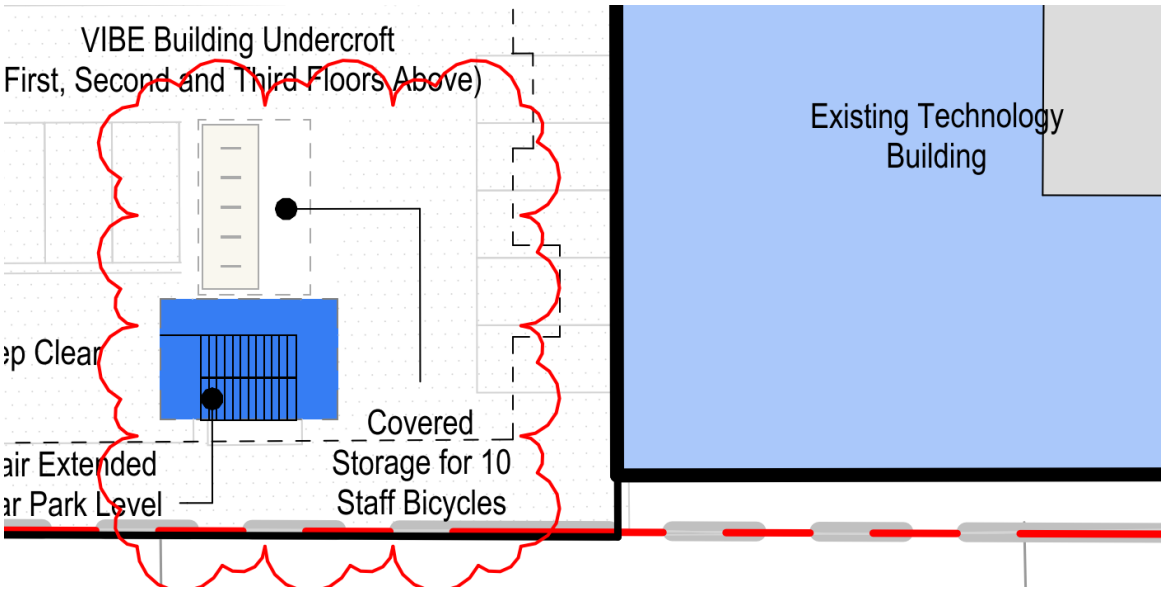
2.4.5 In addition to the cycle parking, a total of 144 lockers have been provided for students (72 in the male changing room and 72 in the female changing room), and the school showers and changing rooms are available to use for students, which complies with the London Plan 2021 guidance of providing one shower/changing room per 10 cycle parking spaces.

Figure 2-2: Student Long Stay Cycle Store



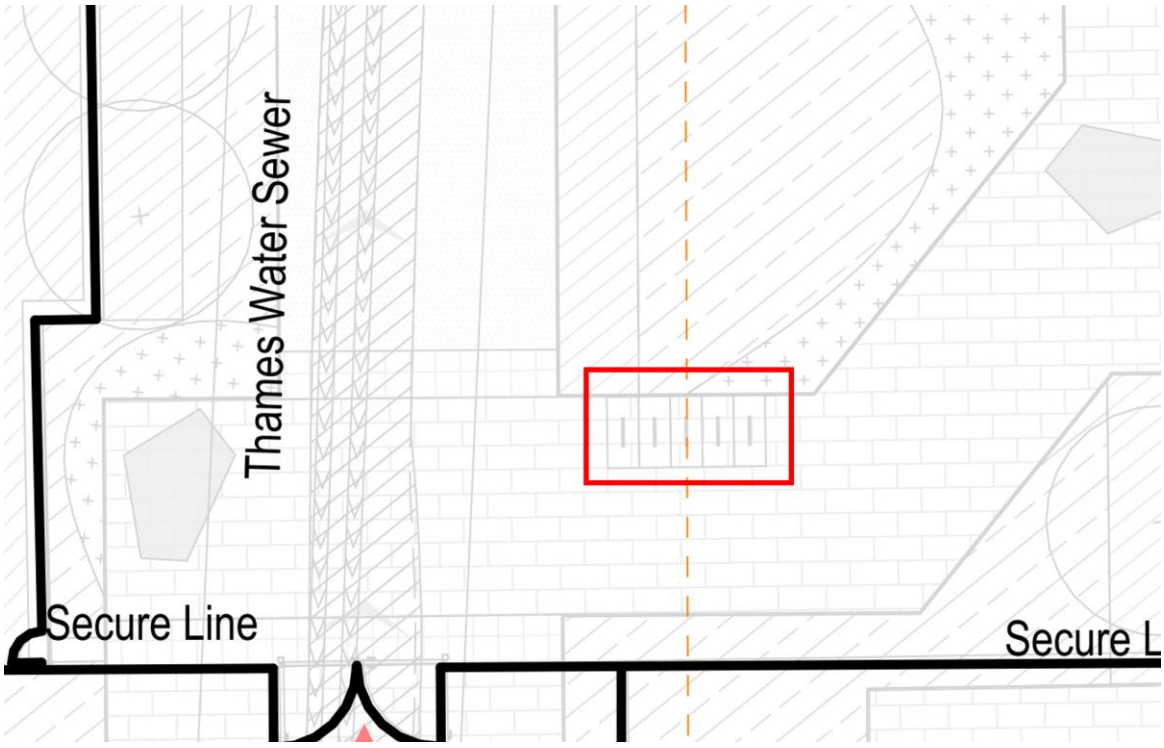
2.4.6 A separate long stay cycle store will be provided for staff, which provides ten long stay spaces, in line with the London Plan requirements, as shown in **Figure 2-3**. All long stay cycle parking can be provided as Sheffield stands. In addition, 10 staff lockers and a staff shower/changing room have been provided within the staff room, in line with the London Plan 2021 requirements for end-of-trip supporting facilities.

Figure 2-3: Staff Long Stay Cycle Store



2.4.7 A further ten short stay cycle parking spaces have been provided within the school landscaping in line with the London Plan 2021 requirements, which is shown in **Figure 2-4**.

Figure 2-4: Short Stay Cycle Parking Provision

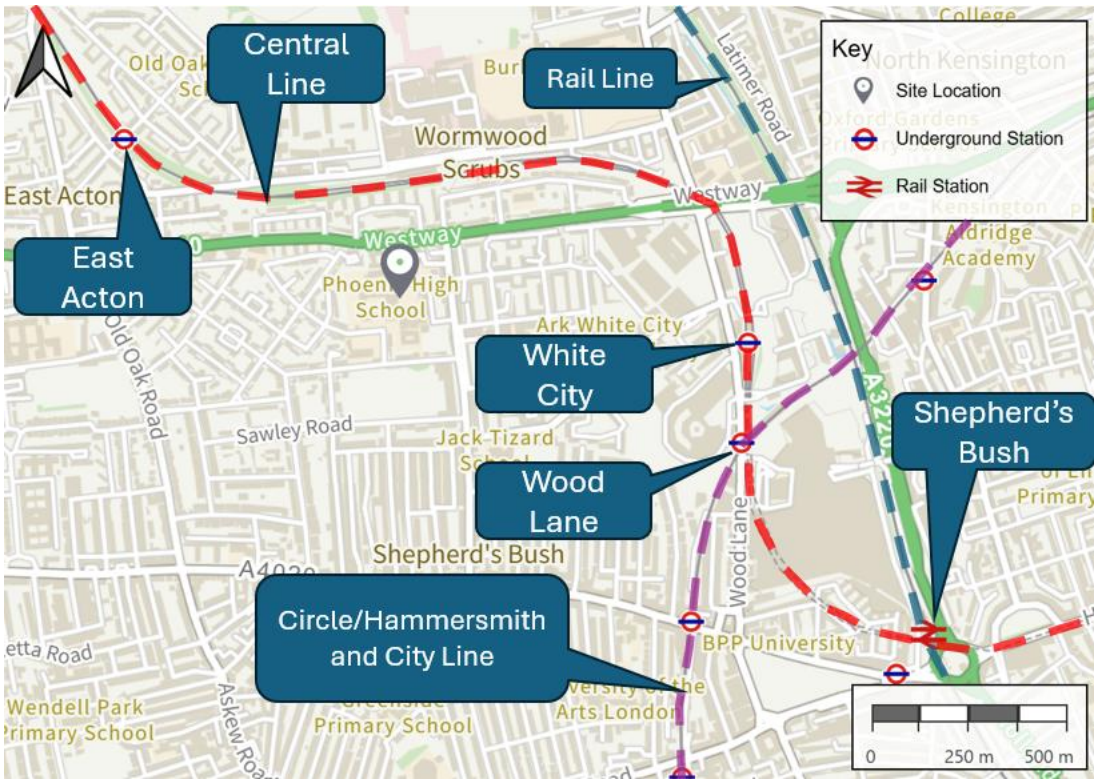


2.5 IMPACT ASSESSMENT

Further evidence as to why the rail and underground trips have been separated should be provided. It is not agreed that this number of trips would use Shepherd's Bush station over White City LU station due to the distance from the site. Therefore, it is deemed that there would be 46 and 38 London Underground trips in the AM and PM peaks, respectively. TfL is proposing an improvement scheme at White City LU station to provide step-free access to the Central Line and additional station capacity. Developer contributions (£1000 per additional trip) are being sought towards these infrastructure upgrades from developments in the vicinity of the station. The TA estimates that 84 additional two-way LU daily trips would be generated by the proposed scheme. On this basis, TfL considers that this impact should be mitigated via a contribution of £84,000 towards the station enhancement scheme, in line with London Plan policies T3 and T4.

2.5.1 We note TfL's request for a contribution of £84,000 towards the White City LU Station improvements and that this contribution amount is based on the combined Underground and rail trips presented within the trip generation in the TA. However, the contribution request assumes every underground/rail trip would use White City Station, whereas in practice, trips will access the rail/underground network in multiple locations. The site's location in relation to LU Stations and lines is shown in **Figure 2-5**.

Figure 2-5: Site Location in Relation to LU and Rail Stations



2.5.2 Rail and underground services can be accessed from the site at the following stations:

- East Acton LU Station – 1.1km to the west of the site (providing access to Central Line services)
- White City LU Station – 1.2km to the east of the site (providing access to Central Line services);
- Wood Lane LU Station – 1.5km to the east of the site (providing access to Circle and Hammersmith & City Line services); and

- Shepherd's Bush LU and National Rail Station – 2km to the east of the site (providing access to Mildmay Line, Southern Rail services and Central Line LU services).

2.5.3 Not all rail/underground trips will use White City Station and a forecasting assessment has been undertaken below.

LONDON UNDERGROUND TRIPS

2.5.4 The TA forecasts that the Proposed Development would generate 36 LU trips in the AM Peak and 30 in the PM Peak. **Table 2-1** sets out the proportional split of travel from 2024 NUMBAT data for Tuesday, Wednesday and Thursday link loads, for:

- White City (for eastbound travel to Central London)
- East Acton (for westbound travel to West London)
- Wood Lane (for northbound travel to Latimer Road and beyond)
- Wood Lane (for southbound travel to Shepherd's Bush)

2.5.5 It is noted that LU trips via the Central Line to travel westbound are likely to access East Acton Station which is a similar walking distance as White City LU Station from the site. The proportional split in LU demand is shown in **Table 2-1**.

Table 2-1: Relevant Link Load Movements

MOVEMENT	AM PEAK MOVEMENT	PM PEAK MOVEMENT	AM PEAK %	PM PEAK %
White City (Central Line Eastbound)	16,294	12,382	50.3%	38.2%
East Acton (Central Line Westbound)	4,671	13,086	14.4%	40.4%
Wood Lane (Circle and Hammersmith & City Line Southbound)	4,153	6,669	12.8%	20.6%
Wood Lane (Circle and Hammersmith & City Line Northbound)	7,285	6,450	22.5%	19.9%

2.5.6 The LU trips associated with the Proposed Trips (36 in the AM Peak and 30 in the PM Peak) have been distributed by station based on the splits in **Table 2-1,** which is shown in **Table 2-2**.

Table 2-2: Proportional LU Trip Distribution

STATION	AM PEAK	PM PEAK
White City (Eastbound)	18	11
East Acton (Westbound)	5	12
Wood Lane (Southbound)	5	6
Wood Lane (Northbound)	8	6

2.5.7 This equates to 18 LU trips and 11 LU trips through White City LU Station in the AM and PM Peak.

RAIL TRIPS

2.5.8 The TA forecasts that the Proposed Development would 10 rail trips in the AM Peak and 8 in the PM Peak.

2.5.9 There is only one rail station within walking distance from the site, which is Shepherd's Bush LU and National Rail Station, located 2km to the east of the site and provides access to the Mildmay Line and Southern Rail services. It is noted that not all rail trips would be from Shepherd's Bush LU and National Rail Station. Rail journeys will also be from major rail stations that may be accessed via the LU.

2.5.10 A proportional split in rail trips is set out below:

- 25% of rail trips will use Shepherd's Bush LU and National Rail Station.
- 75% of rail trips will be from major rail stations that may be accessed via the LU.

2.5.11 Shepherd's Bush LU and National Rail Station are located 2km to the east of the site and therefore would be accessed via walking or cycling. It can also be accessed via bus (bus routes 207, 260 and SL8 from Uxbridge Road) and therefore 25% of rail trips have been discounted.

2.5.12 The average journey time to major rail stations from White City LU Station and Wood Lane LU Station is shown in **Table 2-3**.

Table 2-3: Average Journey Time to London Rail Terminals

LONDON TERMINAL	FROM WHITE CITY	TYPICAL ROUTE	FROM WOOD LANE	TYPICAL ROUTE
Paddington	12 mins	Central → Notting Hill Gate → Circle/H&C	8 mins	Direct H&C/Circle
Euston	20 mins	Central → Oxford Circus → Victoria	22 mins	H&C/Circle → King's Cross → Northern/Victoria
King's Cross St Pancras	22 mins	Central → Oxford Circus → Victoria	18 mins	Direct H&C/Circle
Liverpool Street	24 mins	Direct Central line	26 mins	H&C/Circle direct
Waterloo	22 mins	Central → Oxford Circus → Bakerloo	24 mins	H&C/Circle → Embankment → Bakerloo/Northern
Victoria	18 mins	Central → Oxford Circus → Victoria	20 mins	Circle direct
London Bridge	28 mins	Central → Bank → Northern	30 mins	H&C/Circle → Moorgate → Northern
Charing Cross	20 mins	Central → Oxford Circus → Bakerloo	22 mins	Circle → Embankment
Cannon Street	26 mins	Central → Bank → District/Circle	24 mins	Circle direct
Blackfriars	24 mins	Central → St Paul's → short walk/change	20 mins	Circle direct
Fenchurch Street	30 mins	Central → Bank → Circle/District	28 mins	Circle direct to Tower Hill + walk
Marylebone	18 mins	Central → Bond Street → Bakerloo	20 mins	Circle/H&C → Baker Street
Moorgate	24 mins	Direct Central line to Bank + walk	22 mins	H&C/Circle direct

2.5.13 The journey time to most London rail terminals is comparable from both White City LU Station and Wood Lane LU Station, and therefore, rail trips accessing central London rail terminals (75% of the total rail trips) have been split evenly between both White City LU Station and Wood Lane LU Station.

2.5.14 On this basis, the number of rail trips utilising White City LU Station is shown in **Table 2-4**.

Table 2-4: Rail Trip Distribution

	AM PEAK	PM PEAK
Total Rail Trips	10	8
Rail Trips Utilising White City LU Station	4	3

OVERALL TRIPS VIA WHITE CITY LU STATION

2.5.15 Based on the overall analysis above, the total expected uplift in trips at White City LU Station is shown in **Table 2-5**.

Table 2-5: Trips to White City LU Station

	AM PEAK	PM PEAK
Total Trips to White City LU Station	22	14

2.5.16 Overall, the Proposed Development is expected to have a net uplift of 22 trips in the AM Peak and 14 trips in the PM Peak at White City LU Station.

2.5.17 The White City station enhancement scheme addresses AM peak constraints. The proposed step-free access and capacity works at White City are designed to relieve crowding and accessibility constraints that are at their most acute in the AM peak inbound direction (towards central London). The PM peak is less constrained. TfL routinely assesses public transport impacts and reviews mitigation on a peak-hour (usually AM) basis when seeking contributions on other developments. The contribution should therefore relate to AM peak hour trips only and equates to £22,000.