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Dear David

## **The O2 Masterplan Site, Finchley Road, LB Camden - TfL Detailed comments**

Thank you for consulting TfL on this application. Please note that these comments represent an officer level view from Transport for London, made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this project.

### **Site description**

The site is bounded by Blackburn Road to the north, west and south. Further south the Jubilee, Metropolitan and Chiltern railway lines extend along the site boundary. Finchley Road station is located to the east.

The nearest part of the Transport for London Road Network (TLRN) is the A41 Finchley Road and 7 bus routes run along it. Of these routes, the 187 and 268 currently start / terminate within the site. A further three routes serve West End Lane within walking distance of the west of the site. Several high frequency coach services also stop on Finchley Road.

There are five stations within walking distance of the centre of the site. The nearest London Underground stations are Finchley Road and West Hampstead. Finchley Road station is located to the south-east and West Hampstead to the west on West End Lane. Finchley Road is served by the Jubilee and Metropolitan lines, and West Hampstead is also served by the Jubilee line Finchley Road & Frognal and West Hampstead Overground stations that are located to the north west and south west respectively. West Hampstead Thameslink station is located 70m further north on West End Lane. Both West Hampstead Overground and Thameslink station are step free.

The Public Transport Access Level (PTAL) of the site ranges between a 2 and 6b (on a scale of 0 to 6b, where 6b is the highest). However, the majority of the site achieves between 6a and 6b.

### **General principles**

The scheme is proposed as car-free, excepting blue badge parking. This is strongly supported for development in a well-connected location and in line with London Plan policy T6 and the Council's SPD. Ensuring that the capacity and accessibility of the public transport network in this area is therefore the priority in line with London Plan policy T4. The applicant has been advised to look at the feasibility of creating new links into Finchley Road and towards West Hampstead stations from their site and delivering step free access. This work is ongoing, and TfL welcomes further discussion with respect to necessary safeguarding and contributions to enable future delivery.

## **Access**

The principal site access will be from the east via the A41 Finchley Road, off a signalised junction with filter lane to Blackburn Road. There will be a secondary access from Blackburn Road to the west with no vehicular link between the two sections (as is current). Buses' access to the site via Blackburn Road from the east will be retained which is supported by TfL. Further comments on potential access from or via West Hampstead and Finchley Road underground stations are considered below.

For the outline element, it is proposed that the Finchley Road/ Blackburn Road junction could be modified in line with fewer vehicle movements expected. The implications on junction highway performance are also considered below.

## **Public Realm, Healthy Streets and ATZ assessment**

The Mayor's Healthy Streets (HS) Approach is central to delivering good growth in London and enabling people to travel by walking, cycling and public transport.

TfL expects all streets and public realm within and around the site to be designed in line with the HS approach to help achieve the outcomes of the Mayor's Transport Strategy (MTS) relating to healthy streets and healthy people, a good public transport experience, and delivery of good growth.

The proposals include a new pedestrian and cycle east-west link which is supported as it will not only improve permeability but enhance connections with the surrounding area. Blackburn Road east will also become a low-speed, low-traffic environment to support active travel, along which the applicant intends active travel users will be prioritised. That said, there are no proposals here to segregate cyclists from other traffic, the reasoning being the forecast level of movement on both Blackburn Road (the main cycle route) and the design speed of the route, cyclists mixed with traffic is acceptable according to LTN 1/20. The applicant should however clarify how the public realm within the site will connect with a cohesive urban realm strategy to underpin it.

The proposals for Finchley Road include a wider effective footway and tree planting which is welcome and would be delivered through a section 278 agreement with TfL; Asset Operations would need consulting if there is any intention for TfL to take on these trees. A study on the pedestrian level of service in support of all the changes to footway is requested at this stage as a supplement to the Healthy Streets Check, in which the score uplift is overly generous particularly for Finchley Road. TfL seeks to navigate a more realistic assessment and from it a clearer picture of which would be the priorities for improvement through design and developer contribution. A good proportion of the increases seem related to the installation of trees.

The proposals for the public realm at the corner of Blackburn Road with Finchley Road should also be reconsidered however as they would, diminishes the space available for pedestrians contrary to healthy streets principles.

TfL welcomes further discussion about the HS check to understand the priorities for improvement through design and developer contribution. The applicant should clarify in greater detail the width of the carriageways and footways on Blackburn Road and where they vary. A contribution towards Legible London signage to be paid to and delivered by the Council will be sought.

The proposals are supported by an Active Travel Zone (ATZ) analysis, in line with London Plan policies T2 (Healthy Streets) and T4 (Assessing and mitigating transport impacts). No significant barriers were found by the applicant that would deter or prevent walking and

cycling as a primary mode of transport along the key routes from the site. That said, Finchley Road itself is a significant barrier to non-vehicular passage east-west and into the site. At the pre-application stage the applicant indicated that a new pedestrian crossing could be achieved although considerable technical challenges were also identified.

There is an increasing emphasis in the Capital on the safety of the public realm, in line with London Plan policy D8, TfL urges further discussion to explore this matter further. The development will generate a considerable increase in pedestrian numbers, after dark, that would otherwise need to use the underpass. The applicant previously offered to undertake a feasibility study of providing a surface crossing across Finchley Road in conjunction and with further work on its proposed changes to the Blackburn Road - Finchley Road junction, and in pursuit of this safety objective, TfL would like to re-engage on this. The study would need to identify the impacts on traffic flow, bus and coach stops and on road safety as well as the removal of the underpass

#### Junction alteration proposals and modal impacts.

In reflection of reduced vehicular demand in and out of the Site, the applicant proposes the removal of both the separate left turn lane from the northbound Finchley Road approach into the junction and an eastbound lane on Blackburn Road and provision of a stop line by the pedestrian crossing. This is supported by LINSIG modelling, outside the Model Audit Process (MAP). Auditing by TfL of this is likely to need to be undertaken by Modelling and Signalling teams at the applicant's expense.

TfL welcomes the proposed change from two general traffic lanes to one lane and an advisory cycle lane at the Blackburn Road approach to the junction. This will help cyclists reach the Advanced Stop Line and enable them to set off ahead of general traffic. Consideration should be given to changing the proposed advisory cycle lane to a mandatory cycle lane, especially as this section of carriageway has double red lines with 'no stopping at any time' restrictions.

However, the benefits to pedestrians are mixed. It reduces the number of stages required for pedestrians to cross Finchley Road from 3 to 2 but it adds an additional stage for pedestrians travelling from the SE corner to the NW corner of the junction (from 3 to 4), so it cannot be described as a simpler crossing arrangement. Pedestrian demand east - west may be better catered for with a surface crossing further south as mentioned earlier, additionally or solely, depending on pedestrian origin-destination survey and flow analysis which TfL seeks. Such analysis also assure that the number of stages is being reduced for the most heavily used movement.

Furthermore, clarification on what the 'stopped up' space at the junction would be used for is necessary. TfL would not and could not reallocate public highway to private purposes without very good justification, that it brings significant benefits (e.g., to pedestrians, cyclists, or Buses). Without these assurances, the space generated by the reallocation of carriageway would be better used as footway space, a public square, perhaps seating or greenery.

In summary, while broadly supportive of the changes to the Blackburn Road approach, the junction alterations should focus more on increasing pedestrian capacity, given well over 220 pedestrian and 136 bus 'out' trips (net) will be generated in the morning peak. This could be done, whilst carefully limiting impact on the bus network, by widening crossings, improving their directness, widening footways and simplifying movements.

#### **Transport Assessment.**

The trip generation methodology is elaborate but not wholly realistic. On station capacity assessments:

1. The applicant may have over-estimated walk share for affordable housing.
2. There are various adjustments to LU mode share, they forecast 34% of private residents will use LU/LO, and only 6% of affordable housing residents. They seem possible not supported by mitigation. Then they average them for assessment purpose, so the assessment is based on 21%.
3. Also, the applicant nets off the figure based on existing use of the site. So, from just under 1800 new flats, the gross number of station entrants would be 236 in the AM peak, whilst the net figure is 72 in AM. This doesn't make much sense, as in Table 62, they say 31 currently board LU/LO trains in the AM peak from site. It would appear the net figure should be 205 not 72.
4. It is not clear that the observed strategic data and Numbat have been used in the base situation and been adjusted as requested elsewhere.
5. The focus presented is on peak hour impacts rather than shorter periods of time as we requested on other schemes (TfL is happy to give examples on request).
6. Clarification is sought on what basis trips have been assigned to various station, was there an agreed methodology?

Overall, we believe the assessment under-estimates future public transport demand, this is mainly because of mode assumptions have been adjusted and how existing trips have been assessed. Revisions and/or discussion with Technical Planning TfL staff are requested.

For this development to support significant mode shift to walking and cycling, we need a significant improvement following discussions, to assess what is needed, and we need confidence in general walking demand, and walking as a sub-mode to stations. As a general point this will help focus on where public transport capacity and access should be improved, to address this being car free development.

The applicant's trip assessment is derived from survey data from sites in the CAZ which results in an unfeasibly high pedestrian main mode share and potentially underestimates any public transport impact.

LINSIG modelling of junction changes, outside the Model Audit Process (MAP), is included in the TA. Further discussion is needed to establish whether the works are optional or will be required through a planning condition.

Given the quantum of proposed development, an 'intermediate' assessment on public transport capacity has been undertaken using TfL's strategic model. The applicant states that with the two assessed scenarios, the maximum increase in trips is on the Jubilee line in the AM peak hour (increase of 94 trips for the Full Masterplan scenario, accounting for less than 1% of the future year forecast trips on the line. It is not clear why the analysis has had to revert to a simplistic method for assigning trips from the development to various nearby stations given the use of Railplan.

The applicant does not however, appear to have used TfL's Railplan data. The use of a potentially out-of-date capacity formula (in a TfL document from 2012) needs explaining as it does not follow TfL's standard approach for converting 'raw' Railplan into data that is appropriate for station-level assessment. TfL's station modelling team has a methodology to calculate station-level data using a combination of Railplan and our base demand datasets which can then be utilised for assessments of station capacity, this is being forwarded on. This must be clarified as well as advice on how the strategic models have been used for a station-level assessment. Pending this work, the applicant's forecast that the maximum increase in trips is on the Jubilee line in the AM peak hour, accounts for less than 1% of the future year forecast trips on the line is not accepted.

The modelling output indicating an additional gate is required at West Hampstead station is noted and should be incorporated in its feasibility study being drawn up by the applicant.

## **Public Transport, improvements**

### London Underground stations

As requested, the proposals are supported by a feasibility study to look at potential improvements to West Hampstead station. Further feasibility work has been agreed to be provided for Finchley Road. Such works are not yet costed but there is sufficient detail and understanding to allow this exercise to progress to inform a discussion about S106 contributions and identifying the works within any local CIL priority lists. The outcome of this work will help also to define safeguarding.

TfL welcomes further discussion with Camden Council and the developer about the priorities for improving station accessibility. Initial feasibility indicates upgrading of West Hampstead station may be both easier/cheaper to construct and would align with masterplan phasing. The Mayor's Transport Strategy aims to secure step-free access to 40% of the Tube network by the end of this year with a longer term target in preparation. Accordingly, the masterplan must safeguard the longer-term opportunity at both stations.

### Buses

The proposals include new/replacement bus stops on Blackburn Road, however 4 bus stand spaces are needed to allow for future growth in the bus network. The length of the western stops must therefore be increased to accommodate 4 buses on the live stand.

TfL has standard terms for leases covering bus infrastructure – route(s), stops and shelters where these are located on private roads. There must be a lease for the bus standing and driver facilities and the requirement for that lease should be a principal obligation of any planning permission. The redevelopment of the site must also allow for unimpeded 2-way bus movement. The current indicative plans show insufficient carriageway width and should be reviewed with TfL. In addition, the applicant should clarify any loading/servicing activity that would be take place on Blackburn Road as that must not delay buses either. Details to show that there is sufficient footway space for a shelter infrastructure and room for the waiting bus passengers should be provided.

There is no provision for dedicated driver facilities, as was requested at pre-application, it is proposed that the town square facilities will be sufficient, but this is not acceptable. TfL also requested access for drivers to a meal relief facility and this has not been included. A cleared, major town centre site like this which will increase demand for buses should provide this infrastructure to support the sustainable development of the area (LP Policy T3 Parts A, B and in particular E: – “development proposals should support capacity, connectivity and other improvements to the bus network and endure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed”. ) This mitigation is important and will be pursued; TfL urges the applicant to resolve this matter and invites further discussion.

A phasing plan indicating how buses may be accommodated across the build programme would be helpful and should be secured by condition or section 106 as appropriate; the applicant understands from pre-application discussions that no changes to Finchley on-street buses infrastructure can be allowed but advance discussions on temporary changes to that on Blackburn Road east as different phases move forward could be contemplated.

The construction phasing must also ensure the bus network can continue to serve the area; safeguarding all stops, stands and driver facilities. TfL will engage on this process so that the location of stops can be moved around Blackburn Road with the required notice to passengers and their safety, as building progresses.

TfL cannot support the proposals for buses currently and seeks to engage further on this matter.

### Coaches

Finchley Road station is an important interchange for public transport, and this includes the scheduled coach network to airports and cities; approximately 250 coaches a day serve Finchley Road's stops in each direction. The applicant is asked to adjust their coach trip generation to reflect the convenience of the stops nearby and commit to safeguarding coach stops in this area.

### **Cycle parking**

Over 1,000 cycle parking spaces will be delivered as part of the first phase of the development, with over 3,500 expected to be provided in total across the entire site. This is welcome as numerically in line with London Plan standards. Although some long-term non-stacked spaces appear in detailed block plans it is not clear whether these comprise both an easy-to-use Sheffield-style component as well as a minimum 5% oversized spaces (for all land uses), both discussed at pre-application stage. There are too many doors from entrance to stands, which will not promote ease of cycling, and in the case of Plot N5 the alternative route is to squeeze past 7 sets of outward opening storage doors, which is not safe. An improved design is sought depicting both long and short-term parking for the detailed phase, given that all cycle parking should demonstrably be in line with London Cycle Design Standards (LCDS).

### **Car parking**

The scheme represents a large shift away from car dominance on-site, where currently there are 520 surface spaces in a central car park plus 110 spaces associated with the car showrooms and five spaces for the Builder's Merchant. As noted above, proposed development is car free, with the exception of 3% disabled persons' (BB) parking spaces, which reinforces the need to improve public transport accessibility in the area. Given the likely timeframe for a phased development of this scale, all of the proposed parking should have active electric vehicle charging point (EVCP) provision, rather than some have passive provision only.

During the phased construction of the Site, there are expected to be periods when the existing Shopping Centre, Sainsbury's and car showrooms will remain open alongside the construction or operation of other phases. TfL seeks to ensure that new occupiers will not have access to a lot of car parking for extended periods and will want to discuss the volume of commercial car parking under those scenarios. This can be confirmed as part of the development of detailed Construction Management Plans. A Car Management Plan should be secured by the Council as a condition for any future planning permissions.

### **Construction and Phasing**

An outline Construction Logistics Plan (CLP) has been provided. A full CLP should be secured by condition in line with London Plan policy T7 (Deliveries, servicing and construction) and discharged in consultation with TfL prior to commencement, noting the comments above on ensuring bus service and infrastructure continuity.

### **Delivery and servicing**

An outline D&SMP has been provided which states the internal servicing yard will provide commercial and residential loading provision for blocks N1, N2 and S1 and the arrangement has been adequately justified within the TA. Not all residential activity (such as food or takeaway deliveries) is appropriate for management via a service yard and accommodating this within the design is set out within the supplied draft Delivery and Servicing Management plan covering internal on-street loading areas. The provision of cargo bike parking-loading

bays to support last-mile deliveries by foot or cycle is welcomed in line with the Mayor's Freight and Servicing Action Plan.

### **Infrastructure Protection**

The proposal appears not to directly involve TfL Operational land, rather the scheme will impact TfL operations such as the interface with the Finchley Rd and bus stops and is adjacent to the railway. For the protection and safety of its assets and passengers, TfL will require details to enable its assessment of proximity of buildings to the railway and about the risk of road vehicles breaching the railway boundary. The applicant's attention has been drawn to the Agent of Change Principle (Policy D12 of the London Plan) which requires the developer to design any noise sensitive buildings, including residential units, to protect occupiers from the impact of the existing operations at both stations and bus stops, this includes but is not limited to noise or vibration. These details should be secured by condition.

### **Travel plan**

An outline Travel Plan for each of residential and commercial uses has been submitted. Funding for the implementation and monitoring of a full Travel Plan should be secured in the S106 in line with London Plan policy T1 (Strategic approach to transport) and T4 part B which states that transport assessments should be submitted with development proposals to ensure that impacts on capacity of the transport network and fully assessed.

### **SUMMARY**

TfL supports the principle of the land use change and particularly the move to a car free development which is appropriate for this highly accessible location. However, the potential to facilitate active travel is not yet realised by the Masterplan and it needs to demonstrate better how a significant mode shift and added convenience and legibility will be delivered. Improving the accessibility and capacity of the public transport infrastructure, in the context of displaced car trips, increased density and range of land uses is a priority. The applicant recognises the need to safeguard limited areas of its land for the improvement of one or both of the stations at the site's boundary and is working with TfL and the Council to develop improvement options that would deliver step free access. Improved bus access and infrastructure must be secured both during construction and end state development and further clarification and justification requested in respect of several other matters.

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