Our ref: CMDN/23/27

**Transport for London**

**Spital Planning**

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Your ref: 2023/2510/P

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| David Fowler, Case OfficerPlanning DepartmentLondon Borough of Camden*David Fowler@camden.gov.uk**By email only* |

4th September 2023

Dear David

**Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16A-18 West Central Street, London. – TfL Detailed comments**

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| Thank you for consulting TfL about this referable planning application. It is understood that the proposal is to to provide a mixed-use scheme with buildings ranging in height to 19 storeys. This would provide 22,650 sq.m. (GIA) of office floorspace (Class E(g)(i)), 1,667 sq.m. (GIA) of flexible town centre floorspace (Class E), 44 residential units totalling 3,992 sqm (GIA) of residential floorspace, along with provision of new public and other associated works. |

These comments follow the Mayor’s recent consideration of the case at stage 1.

TfL is in receipt of the Transport Assessment, Travel Plan, Design & access statement; and another associated document all dated June 2023. These form the basis of the response below.

**Site description and Location**

The site is bounded by Museum Street to the east, the A40 High Holborn to the South, New Oxford Street to the north (both part of the Strategic Road network, SRN), Grape Street to the west with West Central Street dissecting through the centre. This section of High Holborn recently reverted to two-way working as part of highway changes associated with the ‘West End Project’. The nearest stations are Tottenham Court Road and Holborn, both within 400m. The site is also served by numerous bus services. New Oxford Streets is a key bus corridor through central London includes a bus lane in the vicinity of this site. The site has a PTAL of 6b on a scale of 0 to 6b. The Elizabeth line, which will stop at Tottenham Court Road station, will enhance this excellent accessibility further from early 2022

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Approximately 500m away is Quietway Q1, a north-south cycle route linking Waterloo Bridge with Russell Square. The nearest cycle hire docking station is located on High Holborn adjacent to the site frontage.

**Trip Generation and Public Transport impacts**

In line with London Plan policy T4 (Assessing and mitigating transport impacts), the applicant has undertaken a trip generation assessment to evaluate the impacts of the proposed development on the transport networks. It is estimated that the proposal would generate 745 office two-way persons trips for both AM and PM peaks, assuming that 55% of employee travel take place in the morning and evening peaks: 25 AM and 17 PM two way persons trips for the residential, and 86 AM and 252 PM two way persons trips for the proposed retails use. This originates in the 2011 census and should be verified with recent survey data. The assessment concludes that the proposed scheme is expected that overall trip generation can be absorbed via active travel and public transport in line with policy T4 of the Publication London Plan.

**Healthy Streets**

A new north south pedestrian route (Vine Street) will be extended from West Central Street to High Holborn. This is strongly supported given the increase in pedestrian trips and the anticipated future increase in vehicle movement on the parallel section Museum Street due to planned highway changes. The applicant should confirm that the width of the proposed route and that it will achieve pedestrian comfort levels (PCLs) of at least B+ during the peak periods in accordance London Plan policies D8 (Public realm) T2 (Healthy streets).

Clarification is required on the status of the route , which should be publicly accessible at all times of day in perpetuity and secured as such. Legible London signage should also be installed to direct trips via this route and to avoid the junction of Museum Street and New Oxford Street which has previously had a poor collision rate.

The proposals are supported by an Active Travel Zone (ATZ) Assessment. It considers  the quality of key walking routes from the site to local transport stops and stations. . In line with the Mayor’s Healthy Streets agenda, improvements should be considered with Camden Council particularly on the route to the west towards Tottenham Court Road station where 11% of all future trips are expected to be via the Elizabeth line. Improvements should be secured through section 278 or 106 as appropriate.

**Access, parking and servicing**

Pedestrian access to the office buildings will be available on Museum Street, West Central Street and Vine Lane. Access to the residential entrance lobbies will be from New Oxford Street, West Central Street and Vine Lane. Step-free access will be available into all the buildings.

Cyclists will be able to access the long-stay office cycle parking for the Museum Street block via an entrance on West Central Street. Residential cycle parking will be directly accessible from residential lobbies on West Central Street, Museum Street and New Oxford Street. The residential cycle parking for the High Holborn block will be accessed externally.

The proposals include a new north-south pedestrian-only route (‘Vine Lane’) through the site as a continuation of West Central Street. This will help improve the connectivity of the area by creating a new route between New Oxford Street and High Holborn. This proposal is welcomed.

Whilst the replacement of the 228 multi storey parking spaces with a car free scheme is welcomed in this CAZ location, an onsite disabled parking space would usually be required. The applicant advises that the nearest on street disabled parking spaces are within 50 metres from the site; ; clarification is required as to the current usage and capacity of this and other nearby spaces.

There is a redundant vehicle access to the former multi storey car park within the site along with an on-street loading bay on Museum Street. Future servicing access to the proposed building will be via a vehicle lift from High Holborn. In order to manage demand and minimise impact on High Holborn, a booking system should be implemented through the delivery and service plan. The creation of this access will also necessitate the relocation of 5 docking points further east. This is acceptable in principle and should be delivered by the applicant though the section 278 agreement with Camden Council. The constraints of the northern part of the site mean that this element would also be serviced from existing and proposed on street bays. Whilst the replacement of the 228 multi storey parking spaces with a car free scheme is welcomed in this CAZ location, an onsite disabled parking space would usually be required. The applicant advises that the nearest on street disabled parking space is within 65 metres; clarification is required as to the current usage and capacity of this and other nearby spaces.

Approximately 68 servicing trips per day are forecast. They will be managed through a Delivery & Servicing Plan that promotes consolidation wherever possible and to limit vehicles waiting or parking at the loading areas. This should be secured through the section 106 agreement to support Publication London Plan policies T2 and T7 (Deliveries, servicing and construction) part F, which requires new development to reduce road danger from freight trips.

**Cycle Parking**

The overall quantum of long stay cycle parking (429 spaces) would meet the minimum standards of the London Plan, which is welcome. The provision would enable the provision of 56 spaces formed by Sheffield stand (inc. 20 larger spaces), 21 semi vertical stands, 23 folded bike lockers and 236 two-tiers racks. It is considered that larger space should be increased to 21 to meet the London Plan requirement of minimum 5%.

29 short stay cycle parking spaces are proposed, which is below the London Plan minimum standards set out in policy T5 (Cycling) of 65 spaces required for this proposal. These spaces are distributed on Museum Street (14 spaces), High Holborn (14 spaces).

The applicant explains that the Council would like to maintain a maximum footway width for West Central Street and therefore short cycle spaces in this location would conflict with that objective. To offset that shortfall, a contribution to Camden Council is proposed that could be used to provide spaces in the local area. Cycle usage is already high in this area, so is the demand for cycle parking, therefore the applicant should therefore identify other on-street locations to demonstrate there is a robust plan for those additional spaces to come forward in line with policy T5, part D of the London Plan.

As stated in London Plan policy T5, part B, all cycle parking should be designed and laid out in accordance with the LCDS. 5% accessible cycle spaces will be provided from the outset with scope to increase, which is acceptable. The proposed two-tier racks should have a machinal or pneumatically assisted system for accessing the upper level and the rack itself must allow for double locking.

Access to cycle parking is proposed from West Central Street and set out at basement level with access via a dedicated lift and ramped stair. The applicant should ensure that the routes from Museum Street and New Oxford Street is step free with crossovers where necessary. End of journey facilities will be provided in accordance with London Plan policies T1 and T5.

***Cycle Hire***

The creation of this servicing access will necessitate the relocation of 5 docking points further east. This is acceptable in principle and should be delivered by the applicant though the section 278 agreement with Camden Council. It is expected that the applicant to provide additional details on how to approach the design such tree roots and the offset of the units to avoid the manhole cover etc.

**Managing Travel Demand**

A draft Construction Management Plan (CMP) has been provided alongside this application. A full Construction Logistics Plan should be submitted in line with TfL guidance and secured by condition.

The applicant should ensure all construction vehicle movements are safe and support the Mayor’s Vision Zero approach. All construction vehicles should meet the Direct Vision Standard and HGV safety permit for HGVs as part of the Mayor of London's Vision Zero plan to eliminate all deaths and serious injuries on London's transport network by 2041 (see TfL Direct Vision Standards here: <https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles>). The full CLP should also commit to all construction vehicles serving the site being part TfL’s Freight Operator Recognition Scheme (FORS).

A Framework Travel Plan has been submitted, which is welcomed. The full travel plan should be secured and monitored through the section 106 agreement. The sets ambitious targets for cycling with an increase to 17% of all trips within 5 years. This will need to be matched by exemplary cycle provision within the site.

**Summary**

The following matters should be resolved before the application can be considered in line with the transport policies of the Intend to Publish London Plan;

* New pedestrian route should always be publicly accessible, secured via condition or S106 agreement.
* The relocation of cycle docking spaces should be delivered by section 278 agreement
* An Active Travel Zone assessment should identify necessary improvements within the vicinity
* Short stay cycle parking should be increased where feasible and long stay parking improved. Potential location for additional short-stay cycle parking should be identified.
* Clarification on the availability of nearby disabled parking
* The Delivery and Servicing Plan must secure a consolidated management regime and prevent peak hour servicing
* Construction Logistics Plan and Travel Plan to be secured by condition/ s106 agreement

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| PakLim Wong  |
| **Planner - TfL Spatial Planning** |