

**From:** Gavin McLaughlin

**Sent:** 06 January 2025 17:24

**To:** Planning

**Subject:** 2024/4953/P - 33 - 35 Jamestown Road London NW1 7DB, TfL comments

Dear Camden Planning,

Thanks for consulting us on this planning application:

2024/4953/P

33 - 35 Jamestown Road London NW1 7DB

Demolition of existing buildings and structures to facilitate redevelopment comprising a Purpose Built Student Accommodation (Sui Generis) block over the basement, ground, plus six storeys and seventh-floor plant room with flexible commercial (Class E) on the ground floor and a residential (Class C3) block over the ground plus five storeys. Each block has two private courtyards with hard and soft landscaping, cycle parking, and associated works.

Apologies for the delay in us responding. We have the following comments:

- The proposed removal of existing car parking is strongly supported in accordance with London Plan policy T6 (Car parking). The proposed provision of London Plan compliant amounts of long and short stay cycle parking for all land uses is welcomed in accordance with relevant parts of policy T5 (Cycling). Full compliance with the London Cycling Design Standards (LCDS) in terms of the cycle parking design should be secured by condition or another planning obligation.
- The Transport Assessment (TA) acknowledges the site is some distance, 750m, away from the nearest part of London's existing Cycleways network, Cycleway 6 (C6) at Royal College Street. As required by London Plan policy T5 part A all new development proposals in London should help remove barriers to cycling and create a healthy environment in which people choose to cycle, including through supporting the delivery

of a London-wide network of cycle routes, with new routes and improved infrastructure.

We therefore recommend that a Cycle route Quality Criteria Check (see: <https://content.tfl.gov.uk/cycle-route-quality-criteria-technical-note-v1.pdf>) is carried out of the cycle route between the new proposed cycle access, and C6. This could be used to inform securing of appropriate cycle network enhancement mitigation by the Council, in the form of local highway improvement works or potentially signage only (see: <https://content.tfl.gov.uk/cycleways-signing-guidance.pdf>)

- The Section 278 (S278) works proposed on adjacent local highway are supported in principle in line with London Plan policies T2 (Healthy Streets); T4 (Assessing and mitigating transport impacts) and D8 (Public realm). The surrounding streets suffer from private motor vehicle dominance due to existing local motorcycle, EV charging and resident car parking bays. Proposals to remove the existing crossover and introduce additional public cycle parking on Arlington Road are supported. As the site is not located on the Transport for London Road Network (TLRN), general loading access via double yellow lines is a matter for the Council as the local highway authority.
- The up-coming temporary pedestrianisation of Camden High Street nearby is strongly supported by TfL. This proposed development will benefit significantly from the Experimental Traffic Order (ETO) due to large numbers of future student residents and other users and visitors. As a result the Council may wish to secure a financial contribution to making the ETO works permanent, subject to the outcome of the experimental phase. This would be supported in principle in strategic transport terms, also in accordance with London Plan policies T2, T4 and D8.
- Due to existing local on street disabled car parking provision, subject to local Council support, the lack of new provision or safeguarding is on balance likely to be acceptable despite not complying fully with London Plan policies T6.1 (Residential car parking) and T6.2 (Office parking).

- We note a Student Housing Management Plan (SHMP) has been submitted as part of the planning application including proposals for how move-in / move-outs by future temporary student residents will be managed, including promotion of public transport. We also note submission of a Framework Travel Plan as required by London Plan policy T4 part B.

We are aware that Camden Council typically secure standardised funding to resource the implementation of Travel Plans and that will be essential in this case to help make the development acceptable in planning terms with appropriate strategic transport mitigation in place.

In addition, we would recommend consideration of separately and additionally funding via the Section 106 (S106) free Cycle Hire memberships (see: <https://tfl.gov.uk/modes/cycling/santander-cycles/discounts#on-this-page-5>).

We would be happy to help suggest and negotiate an appropriate level of contribution and provide draft wording for the S106 agreement should the Council wish.

We note the likely additional pressure from this development on the nearby Arlington Road docking station mentioned in the TA, as well as the future creation of a new docking station as part of the Camden Goods Yard (Morrisons) development to the north, and an extension to the docking station at Hawley Crescent recently secured from the 'Camden Eye' observation wheel planning permission.

Given that many students may be unable to bring bicycles to and from the development for storage and use during their temporary stays there, this would help to support active travel as required to ensure full compliance with London Plan policy T1 and various Local Plan transport policies in conformity with it.

- The trip generation analysis in the TA, though broadly acceptable methodologically in its own approach, fails to reflect and consider real-

world local conditions in a robust way. Camden town operates with an inverse peak; the majority of its trips and pedestrian crowding occur in interpeak periods during the day, and at weekends, due to its popularity as a visitor and tourist attraction. In addition, student residents often travel outside traditional peaks.

Furthermore, whilst trip rates used in the 17-37 William Road (appeal reference APP/X5210/W/21/3284957) may have been agreed as appropriate for this application in local pre-application discussions, it is unclear how and why a 'zero baseline' position in terms of trip generation and net impact is deemed appropriate. Please provide details of how long the current site has been completely vacant.

Relatedly, TfL is working up a significant upgrade to Camden Town London Underground (LU) station and a contribution to mitigate future trips likely to be generated from this proposal may be sought.

We would be happy to discuss this further on receiving more detail about the interpeak trip generation expected, and the duration of vacant possession at the site.

Should the Council as planning authority instead opt to secure a strong package of alternative transport mitigation including high quality local section 278 and potentially other highway works including to connect the site to C6, and behaviour change measures including free Cycle Hire memberships and proper funding for the Travel Plan, on balance that would be acceptable to TfL.

- Finally we note reference in the TA to strong encouragement of the use of Cargo Bikes in the Delivery and Servicing Plan, which we strongly support in principle in accordance with London Plan policies T7 and our March 2023 Cargo Bike action plan (see: <https://content.tfl.gov.uk/tfl-cargo-bike-action-plan-2023-acc.pdf>)

The Council may also wish to consider a peak loading only policy restricting deliveries by condition or another planning obligation to avoid the local

visitor/tourist crowding peaks. This could specify that any non Cargo Bike deliveries and servicing visits to and from the site should only take place before 10AM each day or after 8PM Sunday to Thursdays. It may also be advisable to restrict moving in and out by future student residents in the SHMP so that also occurs only at those times. However this again is a matter for the Council as the relevant local highway authority.

Thanks and kind regards,

**Gavin McLaughlin MSc; MA; MRTPI**

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