



Our refs: 13/0921 & 13/0922
Your refs: 2013/1957/P, 2013/1961/L,
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10th May 2013

Dear Amanda,

Centre Point Tower, Centre Point Link and Centre Point House, 101-103 New Oxford Street and 5-24 St Giles High Street, London WC1A 1DD – LB Camden, TfL's initial comments

I write following receipt of the above planning applications. Please note that these comments represent an officer level view from Transport for London and are made entirely on a "without prejudice" basis. The following comments are relevant to both Scheme A and Scheme B as they differ only in the number of affordable units being provided and are not materially different in transport terms.

Should this application be granted planning permission, the developer and their representatives are reminded that this does not discharge their requirements under the Traffic Management Act 2004. Formal notifications and approval may be needed for both the permanent highway scheme and any temporary highway works required during the construction phase of the development.

This site was the subject of a previous planning application (LB Camden reference 2012/2895/P which was subsequently refused by Camden. One of the key reasons for refusal was that this application proposed the closure of the northern end of St Giles High Street (part of the Strategic Road Network) to create a new area of public realm. Whilst a plan for this is being considered by both TfL and Camden Council for implementation in the future, this was considered premature in the absence of any traffic modelling to ascertain the highway impacts of the closure. As such, and following extensive pre-application discussions on this and a number of other issues, this revised application proposes no changes to the highway network. However, it is understood that at a point where the closure of St Giles High Street is approved by TfL, a subsequent application making use of the area under Centre Point Link would be submitted to Camden.

Site Location

The site is bounded to the east by Earnshaw Street, to the north by the A40 New Oxford Street, to the south by Denmark Street, and to the west by the A400 Charing Cross Road. St Giles High Street also forms part of the A40 and runs through the middle of the site. However, the highway network around the site is currently subject to a number of temporary changes and diversions associated with Crossrail and London Underground (LU) upgrade works at Tottenham Court Road station, immediately to the west of the site. The A40 and A400 form part of the Strategic Road Network (SRN), with the nearest part of the Transport for London Road Network (TLRN) being the A3211 Victoria Embankment, approximately 1km to the south-east of the site.

Tottenham Court Road station is served by the Central and Northern lines. Victoria line services from Oxford Circus Station and Piccadilly line services from Leicester Square Station are also available within walking distance. In addition, there are 18 bus routes available within 640m (an 8 minute walk) of the site. As such, the site records the highest possible Public Transport Accessibility Level (PTAL) of 6b – out of range of 1 to 6. The accessibility of the site will be further increased following the introduction of Crossrail services at Tottenham Court Road in 2018.

As well as being the traffic authority for the Strategic Road Network, TfL has an interest in this development due to its proximity to, and potential impact on, Tottenham Court Road station and bus standing facilities in the area. There are also a number of schemes that affect the highway network in the area and which are currently under consideration, including temporary road closures and diversions due to Crossrail construction, the St Giles Circus Urban Realm scheme (and associated submission under Schedule 7 of the Crossrail act), and its associated proposals to introduce two way working for buses on Tottenham Court Road and Gower Street. This application needs therefore to be considered in the context of these other schemes.

Buses

Given the reduction in the number of bus trips associated with the development as outlined below and the site's proximity to a number of high frequency bus routes, it is accepted that the site will not result in an unacceptable impact on the local bus capacity. However, please note the comments made in the 'Construction' section, below.

Car Parking

Seventeen car parking spaces are proposed at basement level, at a ratio of 0.12 spaces per unit. It is understood that all these spaces would be of a size that makes them suitable for use by blue badge holders and each space would benefit from an electric vehicle charging point. TfL welcomes the reduction in car parking from the previous application, although it is requested that the spaces are assigned in a way that ensures they can be used by people with mobility issues who may be living in one of the

wheelchair accessible residential units. This may require that spaces are leased rather than sold.

Access to the basement car parking would be via car lift from Earnshaw Street, with an off street area provided for vehicles to wait without obstructing the adjacent bus stands or pedestrian crossing, which is welcomed by TfL. Residents would then be prevented from applying for parking permits in the surrounding Controlled Parking Zone (CPZ), which is supported and should be secured as part of the Section 106 agreement for the site.

Trip Generation and Distribution

Sites within the TRAVL database have been used to determine the number of trips likely to be generated by both the existing use on site and the proposed development, with adjusted 2001 Census data then being used to allocate trips onto different modes, taking into account lower car use in connection with the retail uses for which there is no dedicated parking. This approach seems reasonable to TfL, and results in a reduction in the number of trips across most modes in both peak hours and across the day.

Walking, Cycling and Public Realm

Cycle parking for the residential units is proposed at basement level, with cycle parking for the retail units provided on street at surface level. Whilst the total amount of cycle parking is in line with London Plan standards which is welcomed by TfL, TfL would question whether some of the retail cycle parking needs to be provided at basement level to provide secure parking for staff, although some provision should also be made at street level for visitors. The location of the on street cycle parking should also be confirmed.

Given the wider proposals for the area, including creation of new areas of public space as well as several redevelopments, TfL has aspirations to introduce a new cycle hire docking station close to the application site. Given that the development will introduce new demand to the area, it is felt appropriate that the applicant should make a financial contribution towards this, directly benefiting the site and in line with London Plan policy 6.9 *Cycling*. TfL would welcome further discussion on this with both Camden council and the applicant.

Section 9.2 of the Design and Access Statement supports the removal of the TfL vent on New Oxford Street and states that it is understood that the vent is redundant. However, this is not the case and this is required to vent the new station. The applicant has previously been advised of this.

It is also understood that the contents of the Design and Access Statement that refer to Application 2 are indicative at this stage, and have been provided primarily for reference. However, it is understood that the applicant has met with Gillespies, the landscape architects working on future plans for St Giles Circus, in order to try and incorporate some of the applicants requirements into their designs which is not reflected in this section of the Design and

Access Statement. It is understood that changes have been made in the Gillespies scheme to the steps to the south of Centre Point and that the scope of the paving proposed has been reduced. It should also be noted that the western external stair to Centre Point does not form part of the Gillespies scheme, and as above that the vent shaft on New Oxford Street is not redundant.

There is also no mention within the application of a potential security scheme. Security proposals must be agreed with London Underground, and a condition should be secured on any consent requiring approval of security proposals in consultation with them prior to the commencement of works.

Travel Plan

A draft Framework Travel Plan and Residential Travel Plan have been provided as an appendix to the transport assessment and will need to be secured as part of the section 106 agreement for the site. The Travel Plans have been assessed using the ATTrBuTe tool and their content is generally good, although the mode share targets could be more ambitious.

Construction and Servicing

Servicing is proposed using an off street service area accessed from Earnshaw Street, with service vehicles able to enter and exit the site in a forward gear. This represents an improvement over the current situation where larger vehicles often have to reverse to or from Earnshaw Street and as such is welcomed by TfL.

A draft Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP) have been provided as an appendix to the Transport Assessment. These are welcomed by TfL and should be secured as part of any consent for the site, with both to be agreed in consultation with TfL.

Both the draft DSP and CLP contain good information on the potential measures, targets and monitoring of the plans which will be taken forward once occupiers are known and the construction programme is further advanced. In particular, co-ordination of construction works with other schemes and developments in the area will be key in ensuring that the impact on the transport network is minimised, and it is understood that LB Camden are currently setting up a construction working group to this effect. The applicant should be required to be a part of this working group, and may need to fund some pieces of work (with others) to ascertain the impacts of different schemes being progressed at the same time.

TfL and London Underground have held a number of meetings with the applicant prior to the submission of this application to understand the challenges and constraints around construction and have reached agreement in principle on a number of areas. However, there are several issues that will need to be resolved following any grant of planning consent, including co-ordination with works on neighbouring sites (including Crossrail,

London Underground works, LB Camden public realm works and the proposed development at St Giles Circus) as well as subsequent traffic, bus, pedestrian and cycle impacts. In particular, any delay or cost implication to the Tottenham Court Road Station Upgrade (TCRSU) works would not be acceptable to TfL. As such, a detailed Construction Management Plan should be secured by consent prior to the commencement of works. For reference, the outstanding issues relating to the TCRSU scheme are as follows, noting that TfL are happy to assist in drafting any infrastructure protection conditions:

- The applicant proposes to install a gantry crane in New Oxford Street, on the north side of Centre Point tower in 2014. However, TfL will require this area to facilitate Phase 2 of the TCRSU construction works, consisting of demolition of the existing ticket hall and piling works to protect a Thames Water sewer. It has been suggested that the applicant may be able to remove part of the gantry at the time TfL require the site (mid-2014 but there is a real concern that this may not prove possible. TfL would therefore request that this arrangement be included as a condition to any approval of the planning application. Practically however, the applicant should defer their works until the end of the TCR Phase 2 works. If they do not, and are not in a position to vacate the site required by TfL in mid-July, LU will have to pay damages of up to £12k per day that their contractors cannot complete the works as well as suffering huge reputational damage. The applicant must also consider any disruption to the TCR Project during erection of the gantry and in addition there are buried services running beneath this area which must be removed prior to TfL beginning the Phase 2 works. These have not currently been taken into account by the applicant and must be addressed.
- Figure 5-4 of the Environmental Statement details the Scaffold Protection Fan proposed at Level 3.
 - Section A-A: The vertical support post is likely to conflict with TfL's existing plans to place a crane in this location, which will service piling operations and the ticket hall works.
 - Section B-B and C-C: There is concern that the 3m cantilever fan will restrict the crane operations during the installation of the northern plaza glazing.
- The applicant proposed to erect a hoist at the south-west corner of Centre Point tower and this area is within TfL's current hoardings as it has been 'stopped up' under the Schedule 7 Local Authority Planning Consent and is within the Crossrail Limits of Deviation. This area is required until 2015 for the construction of the station southern plaza entrance. Discussions are ongoing as to whether it is possible to release any part of this area to the applicant, but current plans show it will be used for storage of the glass plaza panels and has been included in the glazing subcontractor's contract.

- Figure 5-2 of the Environmental Statement is not in accordance with TfL's proposed hoarding layouts and construction sequences/programme as the land south of Centre Point will actually form part of the TCRSU Project site, so this arrangement will not be acceptable or possible and will need to be revisited.
- All traffic management must be coordinated with TfL to ensure that there is no compromise to site deliveries for TCRSU and that the opening of the southern plaza entrance, primary access and egress point to the new station, is not compromised. There is concern that additional site traffic movements will further congest an already busy area and may adversely affect Crossrail deliveries, lorry movements and have an impact on pedestrians.

In addition to these issues above, further traffic modelling of the impacts of the proposed traffic management will be required. However, it is accepted that the appropriate models may not be ready for use within the timescales for deciding this application, and as such this modelling should form part of the Construction Management Plan. Consideration of the impacts of the traffic management on pedestrian flow may also be required for approval by TfL.

S106 Contributions and Community Infrastructure Levy (CIL)

London Plan Policy 6.5 and the associated Supplementary Planning Guidance (SPG) 'Use of planning obligations in the funding of Crossrail' (July 2010) set out the mechanism for contributions towards Crossrail. The SPG states that contributions should be sought in respect of proposals for uplifts in floorspace for office, retail and hotel uses in central London where there is a cumulative uplift in such floorspace of more than 500sqm. This application proposes such an uplift but as the application also includes a change of use from office to primarily residential use, given the floor areas involved in this instance no charge would be levied under the SPG.

However, notwithstanding the above the Mayor of London introduced his Community Infrastructure Levy (CIL) on 1 April 2012. Most development that receives planning permission after this date will be liable to pay this CIL and the development is located in the London Borough of Camden, where the charge is £50 per square metre. Further details can be found at: <http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>.

In summary, although TfL have no objections to the principle of the application, some detailed issues around the public realm and construction need to be resolved. Please do not hesitate to contact me if you have any questions or need clarification on any of the points raised.

Yours sincerely

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